REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Sept 2015	Interim SA Report published alongside the 'Preferred and alternative options' version of the CLP2: Detailed Policies and Proposals This is a draft version of the report presented to elected Councillors for consideration ahead of being finalised and published for consultation. There are some gaps in this report, and one section that requires updating. Yellow boxes are inserted into the report as necessary to explain gaps / text that is in need of updating.	Mark Fessey Principal Consultant		

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AECOM Infrastructure & Environment UK Limited

6-8 Greencoat Place
London, SW1P 1PL
Telephone: +44(0)20 7798 5000
Fax: +44(0)20 7798 5001

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INTRODUCTION

1   BACKGROUND

1.1.1   AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Croydon Local Plan 2: Detailed Policies and Proposals (henceforth 'CLP2'). SA is a mechanism for considering and communicating the impacts of a draft plan, and alternatives, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of Local Plans is a legal requirement.[1]

2   SA EXPLAINED

2.1.1   It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.[2]

2.1.2   In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.[3] The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3   More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point?**

    – Including with regards to consideration of 'reasonable alternatives'.

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

    – i.e. in relation to the draft plan.

3. What happens **next?**

    – What steps will be taken to finalise the plan?

    – What measures are proposed to monitor plan implementation?

2.2   This Interim SA Report

2.2.1   At the current stage of plan-making the Council is not consulting on a full draft plan. Rather, the Council is consulting on 'preferred and alternative options'. This 'Interim' SA Report is produced (voluntarily) with the intention of informing the consultation and subsequent preparation of the draft ('Proposed Submission') plan.

Structure of this Interim SA Report

2.2.2   Despite the fact that this is an 'Interim' SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to also structure this report broadly according to the three questions listed above.

2.2.3   Before answering Question 1, however, there is a need to set the scene further within this 'Introduction' by answering two initial questions.

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[1] 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 in parallel with the production of Local Plans, including Area Action Plans. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.
[2] Directive 2001/42/EC
[3] Regulation 12(2)

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 At the current time the Croydon Local Plan comprises the adopted 'Strategic Policies' (formally the 'Core Strategy'),[4] but the intention is for the Local Plan to comprise two parts: the Strategic Policies and Detailed Policies and Proposals[5].

3.1.2 The Strategic Policies set out the spatial vision, plan for the future of the borough, outline the development objectives and state broadly how growth will be delivered. Croydon needs a spatial plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. There is a need for new homes, jobs and the infrastructure to support them, and the challenge for the plan is to address these issues and accommodate sustainable growth whilst respecting the context of Croydon and the 'Places' within.

3.1.3 Whilst a version of the Strategic Policies was adopted in April 2013, a partial review is being undertaken at the current time, and it is this Partial Review that is the focus of SA here. The Croydon Local Plan: Strategic Polices Partial Review is otherwise known as 'CLP1.1'

3.1.4 The Detailed Policies and Proposals (otherwise known as 'CLP2') is the focus of SA within this report. The plan will accompany the Strategic Policies will essentially do two things: 1) Set out detailed planning policies that will help put the Strategic Policies into practice when determining planning applications; and 2) Allocate specific sites for development and land uses up to 2036 to meet the requirements of the Strategic Policies. CLP2 will assist the regeneration of the borough through the setting of firm planning framework that will provide certainty to the community and developers. It will also enable the compulsory purchasing of sites needed to bring forward new development in Croydon.

3.2 Plan objectives

3.2.1 Eleven objectives have been established for the Croydon Local Plan. Objectives have been developed in-light of the 'We are Croydon' vision for Croydon in 2040. The vision is the work of 20,000 people imagining the borough in the future, and is used by Croydon Council's partners as the basis for preparing strategies and plans.

3.2.2 The 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.

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[4] The adopted South London Waste Plan 2012 and Saved Unitary Development Plan policies 2013 also form part of the Local Plan.
[5] The Detailed Policies and Proposals will supersede the Saved Unitary Development Plan policies 2013 on adoption.

- – 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.

3.3 What's the plan <u>not</u> trying to achieve?

3.3.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA. In particular, this chapter introduces:

- The sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA; and

- The detailed criteria that have been used for the purpose of site options appraisal.

4.1.2 Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in within the SA Scoping Report available at:

https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sustainabilityapp

Consultation on the scope

4.1.3 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 Natural England, the Environment Agency and English Heritage.[6] As such, these authorities were consulted on the SA scope in 2012. Since that time, the SA scope has evolved as new evidence has emerged - and in particular work has been undertaken to develop detailed site options appraisal criteria - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2012.

The version of this report published for consultation will include some additional text summarising the SA scope (as understood from context/baseline review) and how understanding of the SA scope has evolved since 2012.

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[6] In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

4.2 Key issues / objectives

4.2.1 The following table presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Objectives are grouped under 18 sustainability 'topic' headings (and can also be grouped under six Community Strategy themes). Taken together, these sustainability topics and objectives provide a methodological 'framework' for appraisal.

Table 4.1: Sustainability topics and objectives (i.e. the SA framework)

Community Strategy theme	Sustainability topic	Sustainability Objectives
An enterprising city	Economic development and employment	Regenerate Croydon as a vital and diverse economic centre
		Encourage business opportunities in high areas of unemployment, such as the northern and south eastern wards of the Borough
A connected city	Transport	Promote public transport and improve conditions for all transportation users
		Reduce greenhouse gas emissions
		Promote the use of renewable energy
		Facilitate modal shift away from the private car
A sustainable city	Energy consumption	Reduce greenhouse gas emissions
		Increase the uptake of energy efficiency measures
		Promote the use of renewable energy
		Adaptation and resilience to climate change by minimising risk of overheating through design
	Biodiversity, flora and fauna	Conserve and enhance biodiversity and the quality of the environment, including incorporating features into development such as green roofs and an appropriate range of outdoor spaces in developments
		Increase quality and range of wildlife habitats in the borough
		Increase tree cover
	Water Use	Encourage more efficient use of water
		Adaptation and resilience to climate change and higher population
	Drainage, flooding and water quality	Reduce pollution to water
		Reduce flood risk in vulnerable communities
		Steer vulnerable development away from areas affected by flooding
		Adaptation and resilience to climate change
	Air quality	Reduce emissions of pollutants to air
		Reduce greenhouse gas emissions
	Waste	Promote waste minimisation, recycling and composting
		Reduce greenhouse gas emissions from waste
		Increase amount of energy generated from waste
	Noise	Reduce noise pollution, including reducing the adverse impacts of noise from traffic, freight, servicing, construction and demolition

	Conservation of the built environment	Maintain and enhance the historic environment
		Bring forward investment in the historic environment for regeneration, reuse and adaptation
		Use heritage assets to provide educational opportunities and combat social exclusion
	Materials	Promote and increase use of building materials that have a low environmental impact
A caring city	Human health and wellbeing	Improve mental and physical wellbeing
		Support for carers and those with long term conditions
		Facilitate fair and equal access for all members of the community, including health care, education and training, jobs, community and cultural facilities
		Ensure a better living environment with enriched urban spaces, places for people that are safe, active and promote healthy communities and are adaptable to changing needs
	Crime and Safety	Reduce anti-social activity, opportunities for crime and fear of crime
	Social inclusion and equality	Create community identity and sense of place
		Promote adaptable, durable and inclusive developments
	Housing	Everyone should have the opportunity to live in a decent home
		Improve housing conditions and reduce homelessness
		Plan to meet the housing requirements of the whole community, and provide greater choice and an appropriate mix in the size, type and location of housing
		Promote adaptable, durable and inclusive developments
A learning city	Archaeological heritage	Maintain and enhance the historic environment
	Education, skills and training	Facilitate fair and equal access for all members of the community to education and training
		Improve educational and training facilities within the Borough
		Increase in places for children's education
A creative city	Culture, Sport & Recreation	Promote growth of creative industries and development of centralised hub to support creative businesses
		Support temporary use of vacant buildings and sites for creative/cultural activity
		Ensure that all communities have access to leisure and recreation facilities

4.3   **Site appraisal criteria**

4.3.1   Whilst SA scoping work led to the identification of an 'SA framework' comprising a list of broad objectives, it was subsequently recognised that the framework, whilst suitable for appraising alternative / draft policy approaches, is not suited to appraising a large number of site options given the need to ensure consistency (and hence 'a level playing field').

4.3.2   It was recognised that there was a need to develop more specific criteria for the purpose of appraising a large number of site options. Work was undertaken to develop a criteria-based methodology, and whilst that methodology has not been the subject of consultation to date, stakeholders are welcome to comment at the current time.

4.3.3   Table 4.2 introduces the site appraisal criteria that have been developed/applied, and considers the degree to which the criteria reflect the established SA framework. The aim is to demonstrate that the criteria 'hang off' 'or 'fit' the SA framework as best as possible, recognising that the range of criteria that it is possible to apply, when appraising a large number of site options (and given that there is a need to appraise site options 'on a level playing field') is inevitably limited by data availability.

4.3.4   The methodology was developed on the understanding that -

- There is a need to rely on location / distance criteria, thereby enabling appraisal utilising Geographical Information Systems (GIS) software; and

- There is little or no potential for qualitative analysis, i.e. analysis that employs evidence-based professional judgement. This reflects the fact that it has not been possible to undertake a programme of site visits.

Table 4.2: Site appraisal criteria (also discussing 'fit' with the SA framework, and highlighting data gaps)

SA topic	Relevant criteria (location in relation to…)	Comments
Economic development and employment	• Employment Area • Strategic Employment Area • Area of employment deprivation	**Limited data** exists to inform the appraisal. It is possible to identify instances where development would lead to the loss of an employment site (i.e. the employment use would be lost to another use); however, it is difficult to draw strong conclusions (e.g. because employment site may be vacant or underperforming). It is also possible to consider the implications of development (whether housing or employment) in proximity to existing employment locations; and development within areas of existing employment deprivation (as defined by the Index of Multiple Deprivation). However, again it is difficult to draw strong conclusions.
Transport	• Area of high/low Public Transport Accessibility Level (PTAL)	**Good data** is available to inform the appraisal. Where PTAL is a high then there is good opportunity to decrease reliance on the private car as a means of transport. However, PTAL is not the only factor. It has not been possible to take account of the location of housing site options in relation to key destinations and use this information to build a more detailed picture of traffic flows / the potential for residents to minimise distance travelled by private car.

SA topic	Relevant criteria (location in relation to…)	Comments
Energy consumption	-	**No data** is available to inform appraisal of site options. Whilst some site options may well have inherently greater potential to incorporate on-site low carbon energy, or link to a decentralised source of low carbon energy, there is insufficient evidence to enable analysis. As for the potential for development to support building integrated renewables (such as solar PV and solar heating), this is not locationally dependent; and whilst terrain / aspect can have some bearing on the potential for solar gain, this is not a clear relationship that can be taken into account.
Biodiversity, flora and fauna	• Sites of Scientific Interest (SSSIs) • Locally designated wildlife sites • Ancient Semi Natural Woodland • Other woodland • Local Nature Reserves	**Good data** is available to inform the appraisal. SSSIs are of limited occurrence / extent within the Borough, but locally designated wildlife sites and patches of woodland are numerous. It is fair to assume that sites in close proximity are sensitive, including because development can lead to recreational impacts. It has not been possible to draw on any locally commissioned work to identify further areas of constraint/opportunity (e.g. particularly sensitive locally designated wildlife sites or areas of 'green infrastructure' opportunity).
Water Use	It is **not possible** to appraise site options in terms of the potential to support water efficiency. It might be suggested that large development schemes (i.e. developments on large sites) might be more able to deliver high standards of sustainable design, which in turn support water efficiency; however, this assumption will often not hold true.	
Drainage, flooding and water quality	• Flood Risk Zones	**Good data** exists to inform the appraisal in terms of flood risk, although the available data relates to fluvial (river) flood risk only. Data on surface water flood risk is not available. No data is available to inform appraisal in terms of water quality;[7] however, this is not a major problem. Whilst water pollution sensitivity may vary spatially (including issues associated with the capacity of Waste Water Treatment Works), in the absence of a detailed Water Cycle Study there is no mapped data. It is also the case that issues can often be appropriately addressed through masterplanning/design measures, and so are appropriately considered at the planning application stage. The same can be said for 'drainage'. It is also the case that water resource availability does not vary significantly within the Borough, and hence need not be a consideration here.
Air quality	-	**No data** is available to inform the appraisal. Whilst it is known that the whole borough is designated as an Air Quality Management Zone, no data-sets are available to indicate how air pollution varies within the borough.

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[7] It is unnecessary to seek to appraise site options in terms of groundwater 'source protection zones' and 'primary aquifers'. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.

SA topic	Relevant criteria (location in relation to…)	Comments
Waste		It is **not possible** to appraise site options in terms of the potential to support good waste management. It would not be fair to assume that larger schemes, or residential development in close proximity to household waste recycling centres, will necessarily lead to better waste management.
Noise	-	**No data** is available to inform the appraisal. Noise contours are sometimes established around sources of noise (e.g. airports), but not such data exists for Croydon.
Conservation of the built environment	• Conservation area • Historic park or garden • Scheduled monument • Listed building • Locally listed building • Agricultural land[8] • Agricultural land under Environmental Stewardship[9] • Green Belt	**Good data** is available to inform the appraisal, i.e. there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting. **N.B.** Data is also available to show the location of **areas currently designated as being locally important** in terms of heritage (Local Area of Special Character) or in terms of townscape (Croydon Panoramas, Croydon Landmarks and Local Designated Views); however, caution must be applied as evidence points to some of these local designations requiring review. A limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis. It will often be the case that development can enhance assets. There is also a need to consider impacts in terms of **landscape character**; however, data is **very limited**.
Materials		It is **not possible** to appraise site options in terms of the potential to support efficient use of materials during the construction process.
Human health and wellbeing	• Area of health deprivation	**Limited data** exists to inform the appraisal. It is possible to consider the implications of development within areas of existing health deprivation (as defined by the Index of Multiple Deprivation); however, it is difficult to draw strong conclusions. As discussed under other topic headings, there is also some potential to appraise sites in terms of the potential to access services/facilities and open space, which will have implications for health. Another locational issue that can have implications for health is the presence of contaminated land; however, data is not available. Furthermore, detailed investigations can be undertaken as part of the planning application process, and where contamination is identified remediation will be a condition of planning

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[8] Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.
[9] Environmental Stewardship is an agri-environment scheme which provides funding to farmers and other land managers in England who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and 'well farmed' in general terms.

SA topic	Relevant criteria (location in relation to…)	Comments
		permission.
Crime and Safety	-	**No data** exists to inform the appraisal of site options. Whilst the Index of Multiple Deprivation does identify areas of crime deprivation, this data is not considered suitably reliable.
Social inclusion and equality	• Primary Shopping Area • District Centre • Local Centre • Educational Open Space • Area of overall deprivation	**Limited data** is available to inform the appraisal. Proximity to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly); however, data is not available to show the location of specific facilities (e.g. doctors surgeries). Rather, there is a need to assume that District/Local Centres will provide a range of community infrastructure. Also, there is little or no potential to take into account the potential for development at a particular site to put 'strain' on community infrastructure locally, or the potential for development to fund new community infrastructure. Finally, it is worthwhile considering the implications of development within areas of existing multiple deprivation (as defined by the Index of Multiple Deprivation). Development in an area of relative deprivation is assumed to be a positive step given that it can lead to developer funding being made available for targeted local schemes/initiatives; however, it is difficult to draw strong conclusions.
Housing		• **No data** exists to inform the appraisal of housing site options in terms of contribution to housing objectives. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, is higher at large sites).
Archaeological heritage	• Archaeological priority zones	**Good data** is available to inform the appraisal. However, archaeology is rarely an absolute constraint to development.
Education, skills and training	-	**No data** is available to show the location of existing schools. This is a notable evidence gap, although it is recognised that new schools are likely to be delivered in the future. Also, whilst the Index of Multiple Deprivation does identify areas of education and skills deprivation, this data is not considered suitably reliable.
Culture, Sport & Recreation	• Country Park • Metropolitan Open Land • Local Open Land	**Limited data** is available to inform the appraisal of site options. Ideally, data would be available to show the location of sports and recreational facilities.

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5   INTRODUCTION (TO PART 1)

5.1.1   The aim of this part is to tell the 'story' of plan-making / SA that has led to the identification of preferred options - i.e. preferred site specific proposals and development management policies - for consultation at the current time. In-line with legislative requirements, there is a focus on explaining how consideration has been given to 'reasonable alternatives'.[10]

Structure of this part of the report

5.1.2   Broadly -

- Chapters 6 deals with the site specific proposals element of the plan; and

- Chapter 7 deals with the development management policies element of the plan.

5.1.3   More specifically -

- **Chapter 6** - which deals with **site specific proposals** - essentially explains how work was undertaken to answer the following questions:

   1)   What are the **reasonable site options** that should be a focus of appraisal?*

   2)   What are appraisal findings?

   3)   What is the Council's response to the appraisal / why is the preferred approach justified in-light of the appraisal?

- **Chapter 7** - which deals with **development management policies** - essentially explains how work was undertaken to answer the following questions:

   1)   Which development management policy areas / issues should reasonably be the focus of alternatives appraisal?

   2)   What are the **reasonable alternatives** for each of the issues in question?

   3)   What are appraisal findings?

   4)   What is the Council's response to the appraisal / why is the preferred approach justified in-light of the appraisal?

* N.B. There has been a focus on appraising 'site options' rather than 'alternatives' for specific sites. Whilst the current Preferred and Alternatives Options consultation document presents alternative uses (i.e. a preferred use and a non-preferred use) for numerous sites it was determined, after an initial review, that it would not be proportionate to formally appraise these alternatives. It was felt that, whilst stakeholders with detailed knowledge of the sites will be able to helpfully comment on the merits of the alternatives, there would be little potential to differentiate between the alternatives in terms of the strategic issues that must be a focus of SA. Having said this, there is the potential to appraise site specific alternatives in the future, i.e. ahead of finalising the plan for publication under Regulation 19. Stakeholders are welcome to comment on sites that should be the focus of alternatives appraisal.

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[10] In-line with SEA Directive / Regulations requirements, the SA Report (i.e. the report published for consultation alongside the draft plan) must present information on 'reasonable alternatives' as well as 'an outline of the reasons for selecting the alternatives dealt with'.

6 SITE OPTIONS

6.1 Introduction

6.1.1 As discussed above, the aim of this chapter is essentially to explain how, in order to inform preparation of the preferred approach to site specific proposals:

1) Work was undertaken to identify reasonable site options;

2) Reasonable site options were subjected to appraisal; and then

3) The Council drew on site options appraisal findings (amongst many other considerations) when finalising the preferred approach for consultation;

N.B. Whilst the process is most easily conceptualised in terms of the three step approach described above, in practice the process was less linear. In practice, site options were appraised in an iterative and fluid manner, with appraisal work feeding-in subsequent to initial work to identify preferred site options.

6.2 Identifying reasonable site options

Overview

6.2.1 Firstly work was undertaken to identify a long list of site options. The long list was established from the following sources:

- The Call for Sites that took place in February 2012 and February 2014;

- The Strategic Housing Land Availability Assessment prepared by the Mayor of London in 2013;

- Planning permissions and records of pre-application advice; and

- Sites identified by Council officers as having potential for development.

6.2.2 Secondly, work was undertaken to screen out site options and hence 'whittle down' the long list. This work itself involved two stages:

- Consider the locational needs of particular land uses (for which a site might be allocated), and then screen out site options with no potential to deliver.

- Screen out site options within the Green Belt or Metropolitan Open Land where the location is not suitable for de-designation.

6.2.3 The **outcome** of this step-wise process was the identification of **273 reasonable site options**, i.e. site options that should be the focus of detailed SA.

6.2.4 The various screening steps taken are considered under the following sub-headings, and the final sub-section below presents a map showing the location of the reasonable site options.

Screening potential suitability for housing

6.2.5 The following criteria were applied to each site option from the 'long list' in order to identify whether there was the potential to allocate the site for housing:

- Is the site big enough for 10 or more new homes;

- Are there any existing or proposed policy constraints that would prevent the development of the site altogether;

- Is the existing land use protected from development unless certain criteria are met (such as demonstrating lack of demand for an industrial premises or community use);

- Are there any factors that would prevent the site being developed (such as legal covenants or viability issues); and

- Could better use be made of the site for another use such as a new school or Gypsy and Traveller pitches?

6.2.6   This process identified a number of sites that are 'unreasonable' as housing site options.

Screening potential suitability for a primary school

6.2.7   The following criteria were applied to each site option from the 'long list' in order to identify whether there was the potential to allocate the site for a primary school:

- Is the site big enough (with 0.25ha being the smallest site a new primary school could be built on);

- Is the site in an area with an identified need for new primary school classes;

    – Not every area of the borough has a need for new primary school classes beyond 2017. Only the North West, Centre and South West have been identified as needing more classrooms that will require the construction of a new primary school. The remaining areas of the borough (the North East, the East and the South East), either do not have any need for new classrooms or the need is small enough to be accommodated through the expansion of existing primary schools.

- Is the existing land use protected;

- Are there policy constraints that would prevent the development of the site altogether; and

- Are there are known factors that prevent the site being developed?

6.2.8   This process identified a number of sites that are 'unreasonable' as primary school site options.

Screening potential suitability for a secondary school

6.2.9   The criteria applied, when looking to establish those site options with the potential to deliver a secondary school, were similar to primary schools; however, it is of course the case that secondary school require large sites (at least 1.1ha). It is also the case that the criterion 'Is the site in an area with an identified need?' is redundant, as secondary school places are required across the borough.

6.2.10   This process identified a number of sites that are 'unreasonable' as secondary school site options.

Screening potential suitability for a healthcare facility

6.2.11   The Council worked with NHS England, the Croydon Commissioning Group, the South London and Maudsley NHS Trust, the Croydon University Hospital NHS Trust, the London Healthy Urban Development Unit and NHS Property Services to identify sites with the potential to deliver a new healthcare facility, taking into account areas of demand.

6.2.12   This process identified a number of sites that are 'unreasonable' as healthcare facility site options.

Screening potential suitability for Gypsy and Traveller pitches

6.2.13   Gypsy and Traveller pitches are initially considered in the same way as a site for housing as in planning terms it is the same use of land. However, new Gypsy and Traveller pitches have their own specific requirements as well are:

- The site must be big enough for three pitches (with 0.15ha being the minimum site size required for three new pitches); and

- If in the urban area, the site should have no existing buildings (on the grounds that it would not be viable to demolish existing buildings and replace them with Gypsy and Traveller pitches), or the existing building should be available for use an amenity block for new pitches. If in the Green Belt, however, existing built form is considered a positive.

6.2.14   This process identified a number of sites that are 'unreasonable' as site options.

Screening potential suitability for a Creative and Cultural Industries Enterprise Centre

6.2.15   The Croydon Local Plan: Strategic Policies sets out in Policy SP3.3 that it will create a network of Creative and Cultural Industries Enterprise Centres with one each in Croydon Metropolitan Centre, Crystal Palace, Purley and South Norwood/Portland Road. Sites in these locations are considered as potential locations for a Creative and Cultural Industries Centre where there is an existing policy designation protecting the existing use, but where the site could be realistically used to support creative and cultural industries in the borough.

6.2.16   This process identified a number of sites that are 'unreasonable' as Creative and Cultural Industries Enterprise Centre site options.

Screening potential suitability to be safeguarded for transport improvements

6.2.17   Transport of London has provided details of sites which may need to safeguarded for transport improvements. This has been supported by more detailed information in terms of delivery of these transport improvements and why they are required.

6.2.18   This process identified a number of sites that are 'unreasonable' as transport safeguarding site options.

Screening site options in the Green Belt

6.2.19   The following criteria below were used to determine those sites in Green Belt that are not suitable for de-designation:

- An Historic Park and Garden (either of national or local importance);

- A Site of Special Scientific Interest;

- A Site of Nature Conservation Importance;

- A Regionally Important Geological and Geomorphological site;

- An allotment;

- A community garden;

- A cemetery, church yard or burial ground;

- There are known factors that prevent the site being developed (such as legal covenants, viability issues);

- The site is too small to allocate because it wouldn't provide ten or more new homes; or

- A parcel of land completely detached from built up area and separated by one of the designations above.

6.2.20   Any site that met at least one of the criteria was identified as unsuitable for de-designation and hence 'unreasonable' as a site option for further consideration.

Screening site options comprising Metropolitan Open Land

6.2.21   The criteria in the table below were used to determine those sites on Metropolitan Open Land that are not suitable for de-designation.

*Table 6.1: Criteria applied to screen out site options (as 'unreasonable') within Metropolitan Open Land*

Criterion 1	Criterion 2	Criterion 3
Site meets two or more of the reasons for designation as Metropolitan Open Land set out in Policy 7,18 of the London Plan	Site is publically accessible and has at least *one* of the following functions (and, therefore, would meet the tests for designation as Local Green Space were it not for the fact that is already Metropolitan Open Land): • An Historic Park or Garden (of either local or national importance); • A community garden; • A children's play area; • A natural and semi-natural open space; • A cemetery, church yard or burial ground; • A Site of Nature Conservation Importance; or • A playing field or recreation ground.	Site has *three* or more of the following functions (and, therefore, would meet the tests for designation as Local Green Space were it not for the fact that is already Metropolitan Open Land): • An Historic Park or Garden (of either local or national importance); • A community garden; • A children's play area; • A natural and semi-natural open space; • A cemetery, church yard or burial ground; • A Site of Nature Conservation Importance; or • A playing field or recreation ground.

6.2.22   Any site that met at least one of the following criteria was identified as unsuitable for de-designation and hence 'unreasonable' as a site option for further consideration.

The reasonable site options

6.2.23   The 273 reasonable site options - established on the basis of the process described above - are presented within **Figure 6.1** below.

Figure 6.1: Reasonable site options, i.e. site options that have been a focus of appraisal
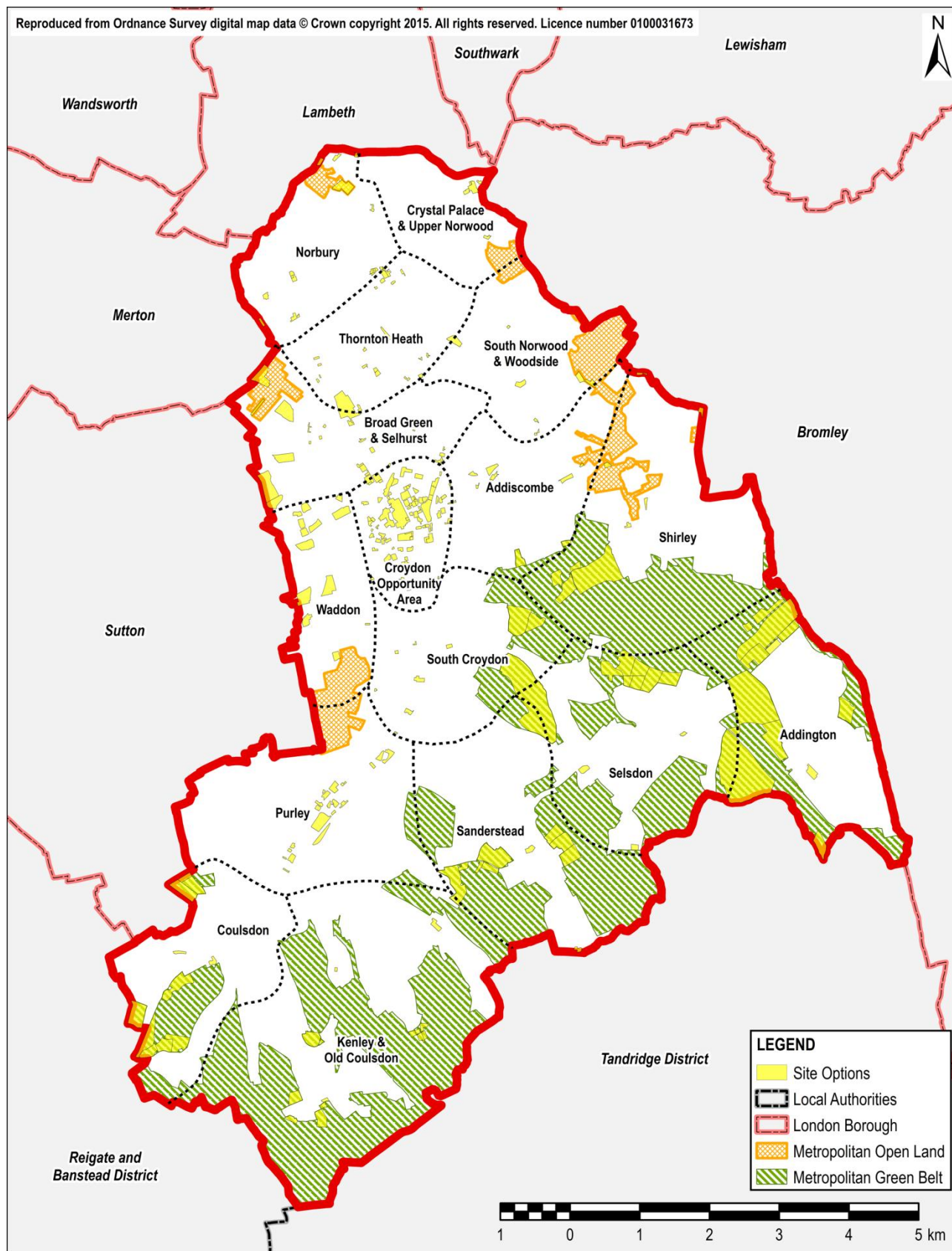
6.3   Appraising site options

6.3.1   The aim of this chapter is to present an overview of the site options appraisal work undertaken. Detailed site options appraisal findings are also available in a spreadsheet, which is available on request.

At the current time, the site options appraisal spreadsheet is up-to-date, but is yet to be converted into a user friendly format (e.g. with unnecessary/distracting data hidden).

Methodology

6.3.2   As discussed above, within Chapter 4 ('What's the scope of the SA?') detailed analysis of site options has involved applying a strict 'criteria-based' methodology.   In summary, the methodology involved querying location of site options in relation to -

- Employment areas / Strategic Employment Locations
- Area of high/low Public Transport Accessibility Level (PTAL)
- Sites of Scientific Interest (SSSIs)
- Locally designated wildlife sites
- Ancient Semi Natural Woodland
- Other woodland
- Local Nature Reserves
- Designated common land
- Flood risk zones
- Conservation areas
- Historic parks / gardens
- Scheduled monuments
- Listed buildings

- Locally listed buildings
- Areas designated as being of local importance in terms of heritage or townscape
- Agricultural land
- Agricultural land under 'Stewardship'
- Green Belt
- Areas of deprivation
- Croydon, and district / local centres
- Educational Open Space
- Archaeological priority zones
- Country parks
- Metropolitan Open Land
- Locally designated open land

6.3.3   The performance of the site options, in terms of the various criteria,[11] is the focus of the discussion below. The discussion below should not be taken to be a 'summary' of the site options appraisal, as there is no substitute for considering the merits of individual site options in isolation (or more than one site option, where there is an 'either or' choice to be made between them, i.e. they are alternatives).   Rather, it enables readers to gain a better understanding of the extent to which the criteria / issues (constraints/opportunities) are a factor, given the site options that are on the table. Detailed site options appraisal findings can only meaningfully interrogated when viewed in a spreadsheet, and hence a spreadsheet of detailed site options appraisal findings is available on request.

6.3.4   **N.B.** The analysis was undertaken with an initial understanding of preferred / non-preferred sites, and this is reflected in the discussion below. Understanding of preferred / non-preferred sites means that there is some discussion below of how preferred sites might impact in combination in terms of particular issues / on particular areas. There is also some discussion of how preferred sites perform in combination / on average, relative to non-preferred sites.

Importantly, readers should note that the discussion below is out of date. Since this text was prepared, the Council's preferred approach to site options has evolved and several sites have been removed from consideration. This section will be updated for ahead of consultation.

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[11] The application of some criteria did not highlight any issues worthy of mention, given the site options that have been a focus of appraisal and hence are not discussed (which is not to say that the criteria is irrelevant and should be removed from the methodology).

Employment areas <mark>N.B this section is in need of updating</mark>

6.3.5 Employment areas are mainly concentrated in two 'Croydon Places': Broad Green and Selhurst and Waddon. This concentration is to the west of Croydon Town Centre, on the western edge of the Borough Boundary. The larger parcels (mainly within Waddon) are also designated as 'strategic' employment areas. Finally, there is one employment area (which, although large, is not designated as 'strategic') within Coulsdon, in the south of the Borough.

6.3.6 There is a need to consider the implications of both site options *on* an existing employment area, and site options *near to* an existing employment area.

6.3.7 Four site options entirely **intersect** with an existing employment area, whilst another partially intersects. Further examination shows that:

- Two of these are preferred urban sites, whilst the other two are non-preferred urban sites.

- The preferred sites are within Waddon and Broad Green & Selhurst, whilst both non-preferred sites are within Broad Green & Selhurst.

- It is known that redevelopment of the preferred sites would be for mixed use, and in one instance a 'Creative and Cultural Industries Enterprise Centre' would be delivered.

- As for the non-preferred sites, the proposed use is only known in one instance. In this instance, the proposed use is 'residential.

6.3.8 Redevelopment of employment land leads to important considerations - see **Box 6.1**. There will often be a need to <u>mitigate</u> for the loss of existing employment land through development management policy, particlarly where there is a spatial concentration and hence a situation existing employment types will be lost from the local area, leaving some local residents (whose skill set is not easily transferred to other types of employment) at risk of unemployment. Mitigatory policy might relate to training and skills development.

Box 6.1. Light Industry and warehousing in London

There is currently active debate regarding the London-wide trend towards redeveloping industrial areas for mixed-use development. Notably, Ferm and Jones (2015)[1] have *"grappled with the divisive question of whether or not the continued separation of industrial land is desirable [and] asked, whether it is possible, through clever urban design, to accommodate businesses currently occupying industrial land within a higher density mixed use context."*

Ferm and Jones conclude that: *"The ongoing loss of industrial land is being driven largely by real estate speculation rather than deindustrialisation. Evidence for the actual state of industrial land - who does business there, how those businesses are linked together and embedded in the places they occupy - is thin on the ground. This lack of information means the impact of this loss of industrial land is a worrying mystery; the current move away from separating industrial land towards mixed use in London's built environment – both on ideological grounds and in response to housing need – needs to be much better understood. There is an urgency to this. The UK Government has proposed[2] to further deregulate the planning system to facilitate conversion of industrial land to housing without the need for planning permission. Concern is particularly acute in London where differences between industrial and residential land values are likely to drive redevelopment if Permitted Development Rights are extended."*

The 'ideological argument' against separating industrial from other land uses suggests that such zoning does not support compact, diverse and vibrant city environments. This resonates with the views of the Deputy Mayor for Business and Enterprise, who Ferm and Jones quote as stating: *"The idea of an industrial park is really a Modern phenomenon… what we will return to is a 19th Century model, where industry is mixed around housing."* In response, Ferm and Jones state that they have *"sympathy with the position of urbanists and economists who deride the concept of land use separation in the modern urban context [but] feel that in London at least the imbalance of land values and the strength of the residential property market means that we now have little alternative."*

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[1] Ferm, J and Jones, E (February, 2015) London's industrial land: Cause for concern? University College London Working paper [online] available at: https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf. Also, see 'The end of industry in London? A report by Jenny Jones, Green Party Member of the London Assembly' (February, 2015) available at: http://www.london.gov.uk/sites/default/files/The_end_of_industry_in_London_Feb_2015.pdf
[2] DCLG (Department for Communities and Local Government). Technical consultation on planning, July 2014.

6.3.9   As for **proximity** to employment land, it is less possible to draw implications in terms of likely sustainability effects. It can be suggested that residential development in close proximity to employment land is a 'positive' from a perspective of enabling access to employment; however, it is not thought that this is an issue in Croydon.

6.3.10   What is notable is the number of site options adjacent to existing employment areas. Ten site options are adjacent to an employment site, and in each instance it is a 'strategic employment site' located to the west of Croydon Town Centre, in either Waddon or Broad Green and Selhurst. Of these sites:

- Six are preferred sites. Of these, five are proposed for mixed use development and the other proposed for a transport scheme.

- Four are non-preferred sites.

Public transport accessibility levels N.B this section is in need of updating

6.3.11   As shown in Figure 6.1, public transport accessibility levels (PTAL) vary throughout the borough with the highest levels being around central Croydon which is served by East Croydon and West Croydon railway stations, the Croydon Tramlink and numerous bus services. Generally, some significant areas in the south of the borough have low public transport accessibility, particularly the areas of Coulsdon, Mitchley Wood, Selsdon, Coombe Wood and Addington.

Figure 6.1: Public Transport Accessibility Levels (PTAL) across Croydon Borough
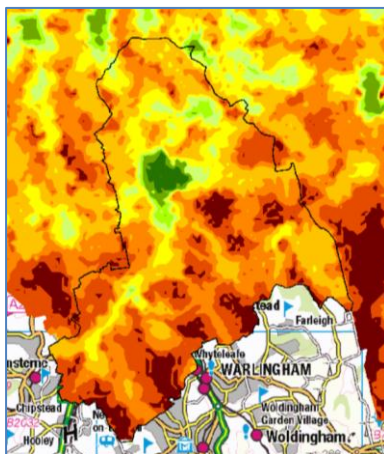
6.3.12   20% of the 131 preferred site options have PTAL scores of 2 or lower (poor to very poor). In contrast:

- 69% of the 146 non-preferred site options have PTAL scores of 2 or lower; and

- The equivalent figure for non-preferred sites within the urban area is 49%.

6.3.13   Conversely, 50% of the preferred site options have PTAL scores of 5 or greater (very good to excellent). In contrast:

- 15% of the 146 non-preferred site options have PTAL scores of 5 or greater; and

- The equivalent figure for non-preferred sites within the urban area is 25%.

6.3.14   As such, it is clear that, in general terms, preferred site options have higher public transport accessibility than non-preferred sites.

6.3.15   For the 26 preferred sites with and existing PTAL score of the 2 or lower, mitigation in the form of accompanying public transport improvements should be considered. It is noted that six of the sites are located in Broad Green & Selhurst, and five are located in Thornton Heath.

Sites of special scientific interest <mark>N.B this section is in need of updating</mark>

6.3.16   Five of the preferred sites are within 1km of a site of special scientific interest (SSSI). The closest of these is about 55m from a SSSI but this site would be a flood mitigation scheme. The closest of the other four sites (proposed for residential use) would be almost 500m from a SSSI.

6.3.17   Of the non-preferred sites, none of them overlap with a SSSI but two are adjacent. Were these two sites (one in Sanderstead and one in Kenley and Old Coulsdon) to be developed mitigation would likely be needed.

Locally designated wildlife sites <mark>N.B this section is in need of updating</mark>

6.3.18   Five of the preferred sites are within 1km of a site of importance for nature conservation (SINC). The closest of these is about 55m from a SINC but this site would be a flood mitigation scheme. The closest of the other four sites (proposed for residential use) would be almost 500m from a SINC.

6.3.19   Of the non-preferred sites, none of them overlap with a SINC but 13 sites are adjacent. Development could potentially require mitigation specifically to address effects on a SINC.

Ancient semi-natural woodland <mark>N.B this section is in need of updating</mark>

6.3.20   No preferred sites are directly adjacent to an area of ancient semi-natural woodland (ASNW), although six sites are within 400m. Three of these sites are proposed for residential or mixed use. Given the distance to the ASNW (the closest site being approximately 150m away), specific mitigation through policy is unlikely to be required.

6.3.21   Twelve non-preferred sites are adjacent to an area of ASNW. One of these (Site 678) contains a small area of ASNW (approximately 0.45ha of the total site of 6.83ha. If this site was allocated/developed, specific mitigation would be required. A further 34 non-preferred sites are within 400m of an ASNW. The closest of these sites is 150m from an ASNW.

Other woodland <mark>N.B this section is in need of updating</mark>

6.3.22   21 sites contain woodland, but all of these are currently non-preferred sites. Of these:

- two sites (sites 41 and 485) are entirely wooded;
- ten sites have between 30% and 10% woodland; and
- nine sites have less than 10% woodland.

Local nature reserves <mark>N.B this section is in need of updating</mark>

6.3.23   Local nature reserves (LNR) can offer valuable amenity space. No sites, preferred or non-preferred, intersect with a LNR.

6.3.24   A total of 20 sites (both preferred and non-preferred) are within 400m of a LNR; however, only three of these are preferred with these sites being in South Norwood & Woodside (proposed for a secondary school); Addington (proposed mixed use development) and Purley (proposed mixed use development).

Registered common land N.B this section is in need of updating

6.3.25   Registered common land is land owned by one or more where other people, known as 'commoners', are entitled to use the land or take resources from it. There are various legal restrictions on what activities can be undertaken on common land. Four non-preferred sites are adjacent or close to registered common land. Notably, 85% of non-preferred Site 826 is registered common land.

Flood risk zones N.B this section is in need of updating

6.3.26   The main risks of fluvial flooding are in the vicinity of the Norbury Brook through Thornton Heath and Norbury and through Kenley, Purley and Waddon along the Brighton Road and Godstone Road valleys and around the culverted River Wandle.

6.3.27   The area of chief concern for surface water flooding within the borough is that covered by the following three critical drainage areas (CDAs): Purley Cross, Brighton Road and South/Central Croydon. These CDAs delineate the pathway of a former river channel for a tributary of the River Wandle. During heavy rainfall, surface water follows its natural course along the A23 Brighton Road towards the Purley Cross Junction, resulting in flooding to significant depths.

Figure 6.2: Flood risk across Croydon Borough
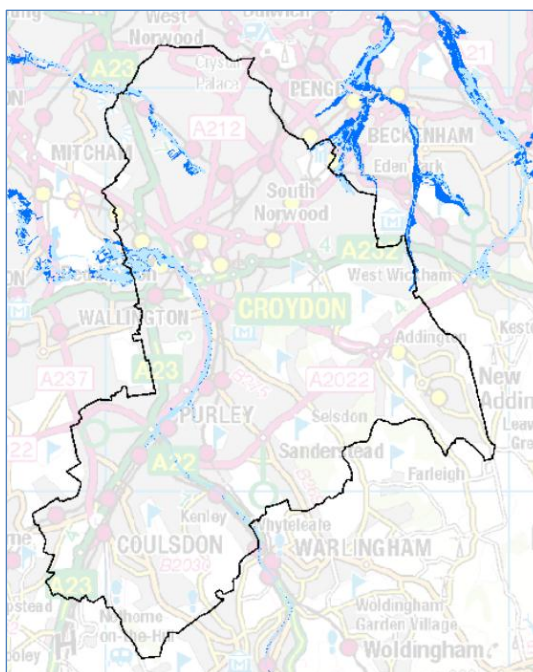
6.3.28   Overall, 32 of the 284 sites lie partly within Flood Zone 2 (dark blue in Figure 6.2), with 29 of those 32 sites also partly containing land in Flood Zone 3 (light blue in Figure 6.2). Almost half of these sites are preferred sites (15 out the 32). All but one of these 15 preferred sites contains an area in Flood Zone 3, with the majority of these sites being located in either Purley or Waddon.

6.3.29   Development of any of the 15 preferred sites in Flood Zone 2 and/or 3 would require mitigation to ensure that development of the site did not increase the risk from flooding to people or property. Mitigation will be particularly challenging where flood risk covers a large proportion of the site area. The following sites intersect with Flood Zone 3 to a significant extent (>50%): Site 355, Site 405, Site 93, Site 54, Site 495, Site 347 and Site 522. In five instances the proposed use is mixed use, whilst in one instance the proposed use is residential and another the proposed use is a car park.

Conservation area <mark>N.B this section is in need of updating</mark>

6.3.30   In total 28 sites intersect with a conservation area (CA) with 20 of those being located entirely within a CA. Of those 28 site intersecting a CA, 13 are preferred sites (with most of these being located in wither the Croydon Opportunity Area or the Crystal Palace & Upper Norwood area). 12 of the 13 sites are proposed for residential or mixed use development with the other proposed for a primary school.

6.3.31   Development within a conservation will likely require some <u>mitigation</u>, which would be expected to be addressed through the EIA process as part of the heritage and townscape assessment. At this stage it is not considered that there are any proposed land uses in a conservation area that would be inherently incompatible with the maintenance of the conservation values of the area.

Listed buildings <mark>N.B this section is in need of updating</mark>

6.3.32   Five site options intersect with a *nationally* listed building, and another nine are within 20m (and thereby have the potential to impact on setting). Two of those that intersect are preferred sites, whilst five of those within 20m are preferred sites. In both instances of a preferred site intersecting, the proposed use is a school.

6.3.33   44 site options intersect with a *locally* listed building, and another 41 are within 20m. 25 of those that intersect are preferred sites (57%), whilst 26 of those within 20m are preferred sites (63%). It will be important to <u>mitigate</u> impacts through development management policy, with a view to positively integrating locally listed buildings as part of any redevelopment.

Other heritage assets <mark>N.B this section is in need of updating</mark>

6.3.34   Other heritage assets are; registered (statutory listed) historic parks and garden, locally listed historic parks and gardens and scheduled monuments.

6.3.35   Only two sites (Sites 460 and 612) are close to a registered park or garden (Norwood Grove Recreation Ground, partly located also in the London Borough of Lambeth). Both are non-preferred sites.

6.3.36   32 sites are within 20m of a locally listed historic park or garden. Of these sites, three intersect and one intersects entirely (the other two intersecting between 20% and 25%). This site (41) near Virgo Fidelis Convent and Convent Wood is shown in Figure 6.3. If this site was to be developed, provision of replacement park or garden space may need to be considered, particularly if the site currently provided public open space.

6.3.37   Of the 32 sites within 20m of a locally listed park or garden, nine are preferred and 23 are non-preferred. Development of the preferred sites would not necessarily require specific mitigation, given that the sites are only locally listed and that, apart from the three non-preferred sites already mentioned, no area of park or garden would be lost. These sites are not necessarily public accessible, but if public access is currently available this would need to be maintained following development.

6.3.38   Three sites lie within 20m of a scheduled monument, with one of these (Site 372) being a preferred site (proposed mixed use) directly adjacent to a scheduled monument.

Archaeological priority zones <mark>N.B this section is in need of updating</mark>

6.3.39   In total, 107 sites intersect significantly (at least 20%) with an archaeological priority area. Approximately 54% of these sites (58 sites) are preferred sites. Development on these sites will require an archaeological assessment to be submitted to Historic England.

Local areas of special character N.B this section is in need of updating

6.3.40   Three non-preferred sites intersect (either wholly or partly) with a local area of special character. These three sites are in Addiscombe, Purley and Norbury. As these three sites are non-preferred, specific mitigation is not considered necessary at this time.

Croydon panorama N.B this section is in need of updating

6.3.41   In total, five sites lie within a Croydon Panorama, which are designated view shafts within the borough. Two of the five sites are preferred, being site 11 in Waddon and site 420 in Upper Norwood and Shirley - see Figure 6.3.

Figure 6.3: Preferred site options intersecting a designated 'Croydon panorama'
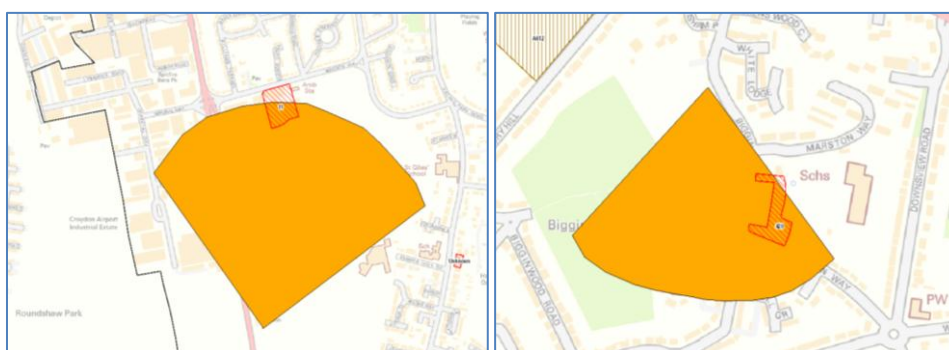
6.3.42   Site 11 lies in Croydon parorama 8 (from Purley Way) while site 420 lies in Croydon Panorama 2 (from Biggin Hill).[12] Site 11 is proposed for secondary school use, while Site 420 is proposed for residential development. Development of these sites for the proposed use will need to take into account the values of the relevant Croydon panoramas.

Croydon landmark N.B this section is in need of updating

6.3.43   Three sites are within 30 m of a Croydon landmark. Site 314 (a preferred site for mixed use development) contains the Ikea Towers (part of former power station) which are designated.[13] The Clocktower on Katharine Street[14] is approximately 25 m from site 194 (a preferred site for mixed use development). Mitigation is likely to be required in the form of a heritage/townscape assessment.

Agricultural land N.B this section is in need of updating

6.3.44   As shown in Figure 6.4, most of the borough is classified as urban (grey), with smaller areas in the south of non-urban land (cream) and Grade 3 agricultural land (green).

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[12] Croydon Council (date unknown) Appendix 6 – Proposed Local Designated Views, Croydon Panoramas and Landmarks [online] available at: https://secure.croydon.gov.uk/akscroydon/images/att2673.pdf (Accessed June 2015).
[13] Reference number LM5 in the Croydon Local Plan.
[14] Reference number LM9 in the Croydon Local Plan.

Figure 6.4: Grade 3 agricultural land (shaded green)
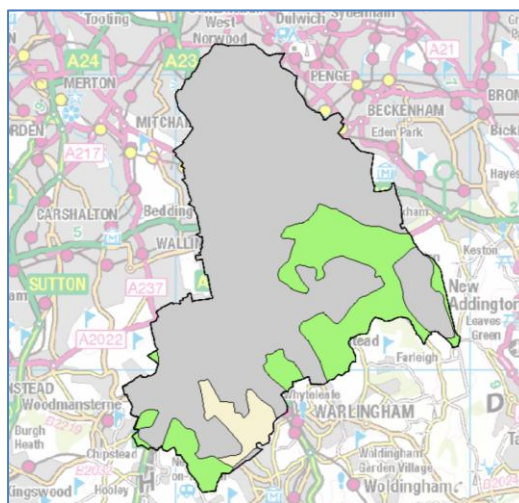
6.3.45   In total, 25 non-preferred site options intersect significantly with agricultural land. Of these, 17 are classified as sites that would come into contention should it be the case that a level of growth must be delivered that would necessitate Green Belt realignment (the other eight sites being classified as those that would likely not be allocated, even it transpires that there is a need to realign the Green Belt).

Agricultural land under environmental stewardship N.B this section is in need of updating

6.3.46   Five of the 25 sites discussed above intersect with agricultural land that is entered into the Entry Level Environmental Stewardship scheme.   All of these sites, located mostly in Coulsdon, are sites that would come into contention should it be the case that there is a need to realign the Green Belt.

Green Belt N.B this section is in need of updating

6.3.47   Figure 6.5 shows that a significant area of the borough (approximately 2,310 ha) is designated as Metropolitan Green Belt.

Figure 6.5: Metropolitan Green Belt
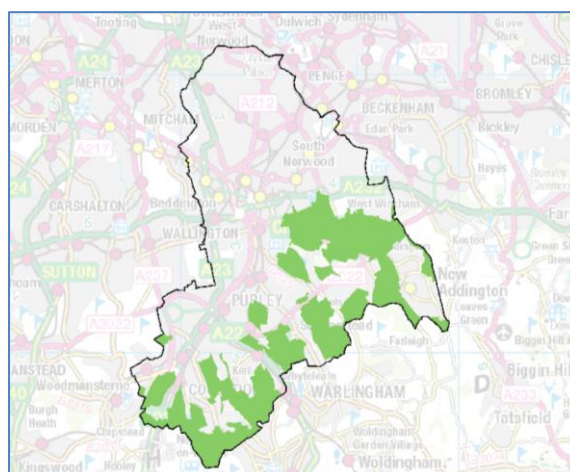
6.3.48   In total, 53 of the 284 sites lie wholly or partly within the Green Belt. All of these 53 sites are non-preferred at the current time; however, it is important to note that (as discussed above under the agricultural land headings) these non-preferred sites are categorised as either:

- Sites that would be considered, should it be the case that the Borough needs to deliver a higher housing quantum (see green sites in Figure 6.6); and

- Sites that would not be considered, even if it is the case that the Borough has to deliver a higher housing quantum (see brown sites in Figure 6.6).

6.3.49 From Figure 6.6 it is apparent that, were a decision to be taken to realign the Green Belt in order to deliver a higher housing quantum within the Borough, there would likely be a disproportionate effect on Addington, in the east of the Borough.

Figure 6.5: Metropolitan Green Belt also showing the four categories of site option
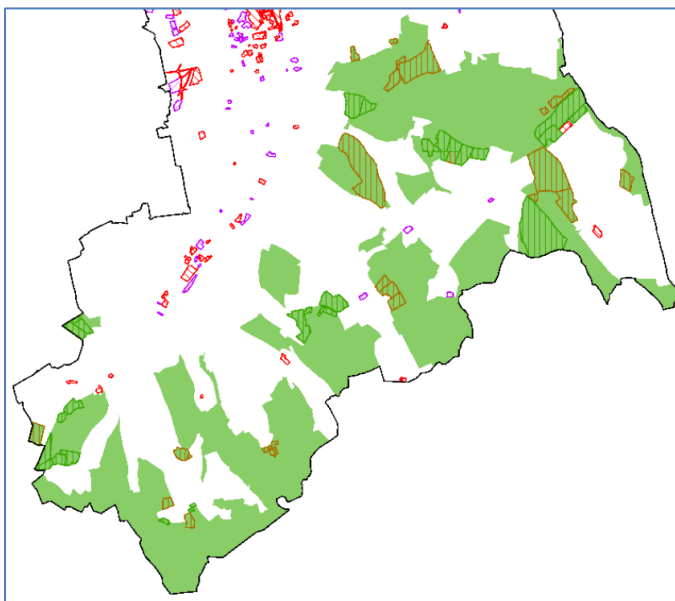
Access to retail services N.B this section is in need of updating

6.3.50 In total, 228 of the 284 sites are within 400m of a primary shopping area, a secondary retail frontage and/or a shopping parade. In terms of the comparison between preferred and non-preferred sites:

- 94% preferred sites are within 400 m

- 68% non-preferred sites are within 400 m

6.3.51 Overall, eight preferred sites are more than 400m from a retail area. Four of these sites are proposed for mixed use development, one is residential and two are for a secondary school. Of these sites, all are between 400m and 750m to a shopping parade so this is not considered critical.

Access to district and local centres N.B this section is in need of updating

6.3.52 The borough contains a number of district and local centres as shown in Figure 6.7. The only Croydon Place areas without a district or urban centre are Waddon and Kenley & Old Coulsdon.

Figure 6.7: District and local centres
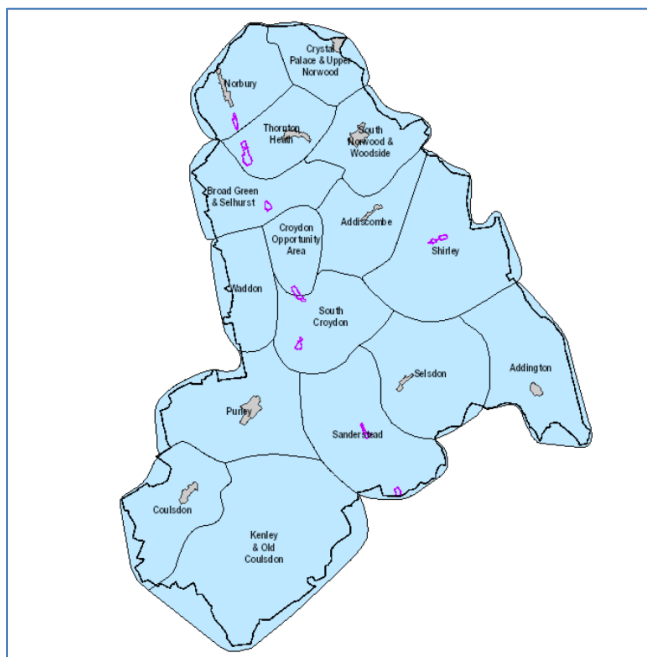
6.3.53 In total, 85 of the 284 sites are within 400 m of a district or local centre. In terms of the comparison between preferred and non-preferred sites:

- 36.6% preferred sites are within 400 m

- 23.3% non-preferred sites are within 400 m

6.3.54 As such, 83 preferred sites are more than 400 m from a district or local centre. Eight of these sites[15] are also more than 400 m from a primary shopping area, a secondary retail frontage and/or a shopping parade. As shown in Table 6.2, all eight of these sites have low to average PTAL scores with three sites having a score of 3, three have a score of 2 and two have a score of 1b.

Table 6.2: District and local centres

Site	Croydon Place	Proposed use	PTAL score
301	Waddon	Mixed use	3
430	Waddon	Mixed use	3
355	Waddon	Mixed use	2
121	South Norwood & Woodside	Secondary school	3
11	Waddon	Secondary school	1b
82	Crystal Palace & Upper Norwood	Mixed use	1b
420	Crystal Palace & Upper Norwood	Residential	2
314	Broad Green & Selhurst	Mixed use	2

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[15] Sites 11, 301, 430, 355 (all Waddon), 121 (South Norwood & Woodside), 82, 420 (both Crystal Palace & Upper Norwood) and 314 (Broad Green & Selhurst).

Educational open space <mark>N.B this section is in need of updating</mark>

6.3.55   Educational open space typically refers to playing fields associated with a school or other type of educational facility. One site (Site 52) is entirely designated as educational open space. This site, in the Croydon Opportunity Area, is part of Coombe Cliff (currently accommodating the Cressey College adult education facility). The potential site allocation would actually be over an existing building, so redevelopment of the site would not result in loss of educational open space.

6.3.56   As this site is non-preferred, mitigation has not been considered.

Areas of deprivation <mark>N.B this section is in need of updating</mark>

6.3.57   The 2010 Index of Multiple Deprivation (IMD) score ranks Croydon as the 107th most deprived local authority in England, out of 326 local authorities nationally and the 19th most deprived London borough out of 32. Overall, Croydon has become more deprived between 2004 and 2010. As shown in Figure 6.8 (where red indicates higher levels of deprivation), the north of borough is generally more deprived than the south, sharing more of the characteristics of inner London than the south of the borough.

Figure 6.8: District and local centres
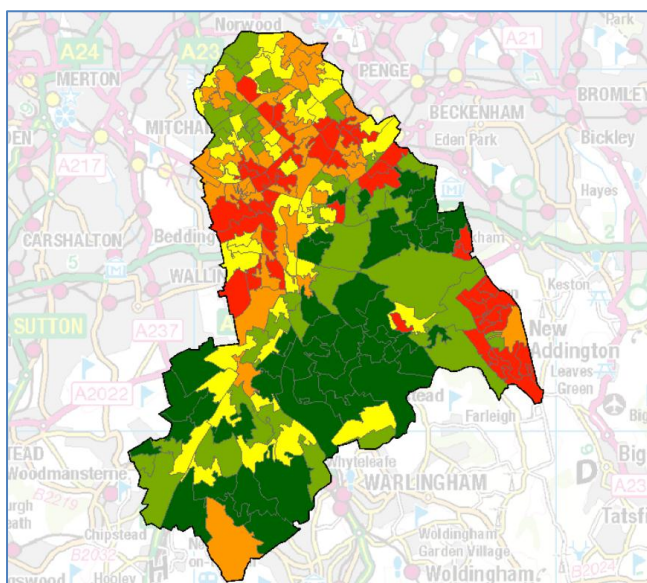
6.3.58   Overall, 53 sites are within areas classed as being in the 20% most deprived area in the borough. Twenty-eight of those sites are preferred, with 13 proposed for mixed use development and eight for residential development. It should be the case that development at these sites serves to support wider regeneration efforts.

Open land <mark>N.B this section is in need of updating</mark>

6.3.59   Parcels of designated open land are spread fairly evenly across the urban area. The vast majority are locally designated, but eight (larger) parcels are designated as Metropolitan Open Land (MOL).

6.3.60   There is a need to consider the implications of both a site option on an existing area of open space (likely to be 'a negative'), and also the implications of a site option near to open space (likely to be 'a positive').

6.3.61 The first point to note is that four site options entirely *intersect MOL*, whilst another three site options intersect to a significant extent. Of these, two are currently 'preferred'. Of the two preferred sites: one, which entirely comprises MOL, is proposed for mixed use development (to include open space); and the other, which is approximately 50% MOL, is proposed for a secondary school (see Figure 6.9).

Figure 6.9: Site option (currently preferred) partially intersecting MOL

6.3.62 One site options *intersects locally designated open land*. This site is proposed for a secondary school (see Figure 6.10).

Figure 6.10: Site option (currently preferred) intersecting locally designated open land
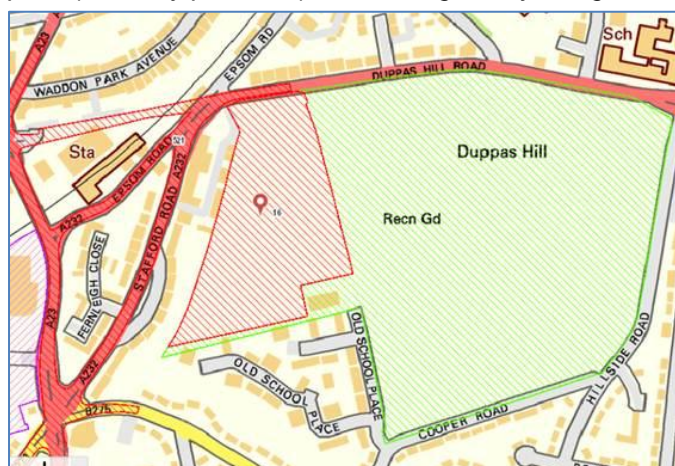
6.3.63 In terms *proximity* to open space, the following points are noted:

- Preferred sites are, on average, slightly closer to existing areas of open space than non-preferred sites:
    - In terms of MOL, preferred sites are 1360 m distance on average whilst non-preferred sites are 1430 m distant on average.
    - In terms of locally designated open land, preferred sites are 240 m distance on average whilst non-preferred sites are 260 m distant on average.
- Four site options are adjacent (within 10 m) to MOL, three of which are currently preferred. Two of these are proposed for residential use, and the other for a secondary school.

- 27 site options are adjacent (within 10 m) to locally designated open land, 12 of which are preferred sites. Five of these are proposed for mixed use, three for residential use, two for a primary school, one for a car park and one for a transport scheme.

- Of the 50 preferred site options that are most distant from MOL and would involve some form of residential development, 44 are within the Croydon Opportunity Area (i.e. the town centre). This reflects the fact that MOL is concentrated around the outskirts of the borough. Aside from sites within the Croydon Opportunity Area, the 50 preferred sites that are most distant from MOL are mostly within Broad Green & Selhurst (11), Purley (11), Thornton Heath (8) and Waddon (5).

- Of the 50 preferred site options that are most distant from locally designated open land and would involve some form of residential development, 24 are within the Croydon Opportunity Area (i.e. the town centre). Aside from sites within the Croydon Opportunity Area, the 50 preferred sites that are most distant from locally designated open land are mostly within Broad Green & Selhurst (11), Purley (11), Thornton Heath (10) and Waddon (4),

Site options appraisal - conclusions ==N.B this section is in need of updating==

6.3.64   The above discussion gives a 'window' into the site options appraisal work undertaken at an early stage of plan-making, i.e. at a time when the Council were finalising the 'Preferred and Alternative Options' consultation document for consultation.

6.3.65   The discussion above does not seek to conclude on the 'overall sustainability' of particular site options, but rather seeks to identify issues associated with particular site options that might have a bearing on whether or not the site should be allocated and/or have a bearing on the development management policy that should be put in place. The above discussion also gives some consideration to the potential for site options to impact in combination, as this should similarly have a bearing on the selection of sites to allocated and/or the approach to development management policy.

6.3.66   Key points highlighted under the headings above include the following -

- **Redevelopment of employment land** leads to important considerations. There will often be a need to mitigate for the loss of existing employment land through development management policy, particularly where there is a spatial concentration and hence a situation existing employment types will be lost from the local area, leaving some local residents (whose skill set is not easily transferred to other types of employment) at risk of unemployment. Mitigation measures might take the form of requirements around training and skills development.

- Whilst the vast majority of growth is set to be directed to areas of high **public transport accessibility**, it is still the case that a number of sites will be allocated at locations with a low PTAL score, particularly in Broad Green & Selhurst and Thornton Heath. Some of these sites are also located beyond easy walking **distance of a local centre** (i.e. an area where retail and potentially services/facilities can be accessed). Mitigation, in the form of accompanying public transport improvement or development of a local centre etc, should be considered.

- **Flood risk** is an issue at a number of sites that are set to be allocated for residential or mixed use. It will be important that the Council is clear on the potential to mitigate flood risk at these sites, without increasing flood risk at sensitive locations downstream.

- Numerous sites are set to be allocated within a **Conservation Area** or where there is the potential to impact a **listed building**. It will often be possible to enhance understanding and appreciation of a heritage asset as part of a redevelopment scheme; however, this matter must be addressed through development management policy.

- Similarly, redevelopment within an area designated as falling within a **Croydon Panorama**, and redevelopment in close proximity to a 'Croydon landmark', will necessitate strong development management policy.

- As things stand, the preferred approach is to focus development within the urban area and hence there is not set to be any loss of **agricultural land**; however, if it transpires that there is a need to realign the Green Belt then agricultural land will come into contention. As things stand, some non-preferred sites have been identified as those that would come into contention. Quite a high proportion of these comprise agricultural land.

- As things stand, the preferred approach is to focus development within the urban area and hence there is not set to be any loss of **Green Belt**; however, it may transpire that there is a need to realign the Green Belt (if it is the case that the Borough must deliver a higher growth quantum). As things stand, some non-preferred sites within the Green Belt have been identified as those that would come into contention, and these sites are spatially concentrated to some extent. This leads to landscape character considerations; however, it is recognised that not all Green Belt land contributes significantly to landscape character.

- A number of sites are set to be allocated in those parts of the Borough that suffer from relative deprivation. This is a positive, and it will be important to seek to capitalise on **regeneration** opportunities through development management policy.

- The Council should reconsider the five preferred site options that intersect **open land** (i.e. Sites 16, 44, 120, 121 and 468), or seek to ensure that loss is mitigated through alternative provision.

- The four preferred site options (that are proposed for some form of residential use) most distant from locally designated **open land** (Sites 396, 404, 337 and 416) are all within Broad Green & Selhurst. The Council might want to consider the strategy for this part of the Borough and/or seek mitigation measures. Provision of new open space may be necessary. Also, it is noted that a number of non-preferred sites perform well, in that they have good access to open space; however, this in itself is not a reason to suggest that the sites should in fact be preferred / allocated.

6.4 Developing the preferred approach

6.4.1 The following text has been provided by the Council, explaining how the site options appraisal findings (along with other considerations) have fed into development of the preferred approach as it stands at the current time:

At this stage, the Council has had the opportunity to take on-board and reflect the site options appraisal findings discussed above (and the detailed appraisal findings from the underlying spreadsheet); however, there Council is yet to prepare a statement responding to site options appraisal / explaining why the preferred approach is justified in light of site options appraisal findings.

7 DEVELOPMENT MANAGEMENT POLICY ALTERNATIVES

7.1 Introduction

7.1.1 As discussed above, the aim of this chapter is essentially to explain how, in order to inform preparation of the preferred approach to development management policy:

1) Work was undertaken to identify policy areas and alternatives that should be the focus of appraisal;

2) The alternatives were subjected to appraisal; and then

3) The Council drew on appraisal findings (amongst many other considerations) when finalising the preferred approach for consultation;

Which policy issues have ('reasonably') been the focus of alternatives appraisal?

7.1.2 Addressing contentious issues systematically, via appraisal of / consultation on alternatives, is a means of ensuring that the final policy approach is justified. However, it is not necessarily the case that every development policy should be developed subsequent to appraisal of alternatives. For many policy areas / issues it is proportionate (given time and resource limitations, and the desire to avoid 'consultation fatigue') to develop a preferred policy approach on the basis of technical work and consultation (on a draft policy) only, without formal consideration of alternatives.

7.1.3 As such, the first step involved thinking about those policy issues that would be a focus of alternatives appraisal. In some cases, the Council was aware of alternative policy approaches necessitating consideration (i.e. appraisal and consultation), given understanding generated through technical work and past consultation (in particular the Detailed Policies 'Preferred and Alternative Options' consultation of late 2013). However, in other cases the Council (in collaboration with the SA consultants) actively sought to explore and identify alternative approaches. This exploratory work was undertaken for policy issues thought likely to be contentious (i.e. divide opinion amongst stakeholders) and/or in instances where it was recognised that the preferred policy approach to addressing the issue could potentially lead to significant effects (as appraised through SA work).

7.1.4 Ultimately, it was established that a 'reasonable' approach would involve appraising alternatives for the following DM issues:

- Residential annexes
- Advertisement hoardings
- Car and cycle parking

7.1.5 Each of these policy issues is considered in turn below.

7.1.6 For other policy issues, whilst alternatives have not been appraised to date, the Council could potentially establish and appraise alternatives subsequent to the current consultation, i.e. prior to preparing the proposed submission version of the plan. Readers are welcome to suggest other policy issues / sets of alternatives that should be the focus of alternatives appraisal.

7.2   Residential annexes

7.2.1   The aim of this section is to introduce the 'reasonable alternatives' that have been established for this policy issue, to present alternatives appraisal findings and then to present the Council's response to the appraisal / justification for selection of the preferred approach.

Reasonable alternatives

7.2.2   The following alternatives have been appraised:

Option 1)   No policy (rely on DM11, Design and character, and SPD2 on Residential Extensions and Alterations)

Option 2)   Residential annexes will be permitted where they:

a) Are ancillary to the main residence;

b) Are not self-contained, share communal facilities within the main dwelling, retain internal linkages with the main dwelling;

c) Have a single shared entrance with the main dwelling; and

d) Comply with the National Technical Housing Standards.

7.2.3   It is considered that these are the reasonable alternatives. Testing these alternatives helpfully enables consideration of wide-ranging sustainability issues.

Appraisal findings

7.2.4   The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix 1**. The methodology is explained in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference.

Summary appraisal findings: Residential annexes

Topic	Categorisation / Rank of preference	
	Opt 1	Opt 2
Economic development and employment	N/a	N/a
Transport	N/a	N/a
Energy consumption	N/a	N/a
Biodiversity, flora and fauna	N/a	N/a
Water Use	N/a	N/a
Drainage, flooding and water quality	N/a	N/a
Air quality	N/a	N/a
Waste	N/a	N/a
Noise	N/a	N/a
Conservation of the built environment	2	☆ 1
Materials	N/a	N/a
Human health and wellbeing	2	☆ 1
Crime and Safety	N/a	N/a
Social inclusion and equality	2	☆ 1
Housing	2	☆ 1
Archaeological heritage	N/a	N/a
Education, skills and training	N/a	N/a
Culture, Sport & Recreation	N/a	N/a

Summary

Allowing development of residential annexes could assist households to adapt to changing circumstances and support the development of more inclusive developments, for example by allowing older relatives and/or carers to live with a family while retaining some private space of their own. Thus it contributes to health and wellbeing and social inclusion objectives. It could also contribute to providing greater choice and an appropriate mix in the size, type and location of housing. Impacts of both options on these objectives are not considered to be significant, given the small numbers of development of this nature anticipated. Option 2 is considered to outperform option 1 against all of these objectives because it provides clarity about what criteria, specific to this issue, would need to be met to make an annex proposal acceptable in planning terms (these criteria are not set out in policy DM11 or the SPD on Residential Extensions and Alterations).

Council response (justification)

7.2.5   The Council recognises the issues raised in this Sustainability Appraisal but taking the Plan as a whole still believes that a specific policy on Residential Annexes will not provide any greater clarity than reliance on the standard Urban Design policy.

7.3   Advertisement hoardings

7.3.1   The aim of this section is to introduce the 'reasonable alternatives' that have been established for this policy issue, to present alternatives appraisal findings and then to present the Council's response to the appraisal / justification for selection of the preferred approach.

Reasonable alternatives

7.3.2   The following alternatives have been appraised:

Option 1)   Set out criteria to ensure that advertisement hoardings positively contribute to the character and appearance of existing and new streets, and of the buildings to which they are attached

Option 2)   Update the existing Advertisement Hoardings & other Advertisements Supplementary Planning Guidance No.8

7.3.3   It is considered that these are the reasonable alternatives. Testing these alternatives helpfully enables consideration of wide-ranging sustainability issues.

Appraisal findings

7.3.4   The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix 1**. The methodology is explained in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference.

Summary appraisal findings: Advertisement hoardings

Topic	Categorisation / Rank of preference	
	Opt 1	Opt 2
Economic development and employment	N/a	N/a
Transport	N/a	N/a
Energy consumption	N/a	N/a
Biodiversity, flora and fauna	N/a	N/a
Water Use	N/a	N/a
Drainage, flooding and water quality	N/a	N/a
Air quality	N/a	N/a
Waste	N/a	N/a
Noise	N/a	N/a
Conservation of the built environment	☆1	2
Materials	N/a	N/a
Human health and wellbeing	☆1	2
Crime and Safety	N/a	N/a
Social inclusion and equality	☆1	2
Housing	N/a	N/a
Archaeological heritage	N/a	N/a
Education, skills and training	N/a	N/a
Culture, Sport & Recreation	N/a	N/a

Summary

The National Planning Policy Framework (NPPF) highlights the importance of the need for detailed assessment where advertisements would have an "appreciable impact on a building or on their surroundings. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts". The Advertisement and Hoardings & Other Advertisements Supplementary Planning Guidance (SPG) No.8 (February 2003) provides guidance on acceptable locations, number, scale and type of advertisements and highlights the need to ensure advertisements are sensitively located and design to minimise the impact on residential areas and on heritage assets. However it is considered that option 1 (policy DM13) is the preferred option as having an adopted policy setting out key requirements will better ensure the protection of the character and appearance of streets and buildings, thereby supporting objectives related to human health and wellbeing and social inclusion/sense of place.

The positive effects on energy consumption and biodiversity objectives could be strengthened by including requirements within Policy DM13 that: powered advertisements (e.g. illuminated signs and electronic displays) must demonstrate how energy efficiency has been maximised; and that options for incorporating wildlife habitat features into the rear of advertisements be considered e.g. swift boxes, 'bug hotels'.

Council response (justification)

7.3.5   The Council will continue to promote Option 1 as the preferred option in the light of this Sustainability Appraisal.

7.4 Car and cycle parking in new development

Introduction

7.4.1 The aim of this section is to introduce the 'reasonable alternatives' that have been established for this policy issue, to present alternatives appraisal findings and then to present the Council's response to the appraisal / justification for selection of the preferred approach.

Reasonable alternatives

7.4.2 The following alternatives have been appraised:

Option 1) Stipulate requirements to promote sustainable growth and reduce the impact of car parking in new development, including specific car parking standards for different types of development

Option 2) As option 1 but with higher car parking standards in areas of low Public Transport Accessibility Level (PTAL 2 or below)

7.4.3 It is considered that these are the reasonable alternatives. Testing these alternatives helpfully enables consideration of wide-ranging sustainability issues.

Appraisal findings

7.4.4 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix 1**. The methodology is explained in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference.

Summary appraisal findings: Car and cycle parking in new development

Topic	Categorisation / Rank of preference	
	Opt 1	Opt 2
Economic development and employment		
Transport	⭐ **1**	2
Energy consumption	⭐ **1**	⭐ **1**
Biodiversity, flora and fauna	N/a	N/a
Water Use	N/a	N/a
Drainage, flooding and water quality	N/a	N/a
Air quality	⭐ **1**	2
Waste	N/a	N/a
Noise	N/a	N/a
Conservation of the built environment	N/a	N/a
Materials	N/a	N/a
Human health and wellbeing	N/a	N/a
Crime and Safety	N/a	N/a
Social inclusion and equality	N/a	N/a
Housing	N/a	N/a
Archaeological heritage	N/a	N/a
Education, skills and training	N/a	N/a
Culture, Sport & Recreation	N/a	N/a

Summary

Both options will positively contribute to achieving transport objectives by dissuading car use and supporting roll out of electric car charging infrastructure, thus reducing greenhouse gas emissions and improved air quality. Option 1 is considered to have the greater positive effect on transport and air quality objectives as it would not allow higher levels of car parking provision in low PTAL areas and thus would contribute more to meeting transport and air quality objectives in these areas.

Not allowing higher levels of car parking for residential development in low PTAL areas is justified by the Council on the grounds that as each area of the borough becomes more sustainable through growth it should encourage greater provision of public transport in areas that currently have a low Public Transport Accessibility Level. This line of argument is clear, however there may be a case for allowing increased parking provision in these low PTAL locations in the early part of the plan period when little growth and development of improved public transport provision will have been realised, particularly in locations where there is no car club provision and therefore residents have limited mobility options.

Council response (justification)

7.4.5   The Council recognises the issue regarding car parking in the early part of the Plan period and as a result of the Sustainability Appraisal additional supporting text has been added to the Plan that sets out circumstances where a higher level of car parking in low PTAL areas may be acceptable as a departure from the Plan in the early part of the Plan period.

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

8   INTRODUCTION (TO PART 2)

8.1.1   The aim of this chapter is to present an appraisal of the preferred approach to the Strategic Policies Partial Review, as understood from the current consultation document. Account is also taken of the preferred approach presented within the Croydon Local Plan: Detailed Policies and Proposals (CLP2) 'Preferred and Alternative Options' consultation document.

8.1.2   Thus…

          … the information presented below is identical to that presented within Part 2 of the Croydon Local Plan: Detailed Policies and Proposals (CLP2) Interim SA Report.

Methodology

8.1.3   The appraisal identifies and evaluates 'likely significant effects' of the preferred approach - as understood from the two consultation document currently out for consultation - on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Chapter 4, above) as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

- Economic development and employment
- Transport
- Energy consumption
- Biodiversity, flora and fauna
- Water Use
- Drainage, flooding and water quality
- Air quality
- Waste
- Noise

- Conservation of the built environment
- Materials
- Human health and wellbeing
- Crime and Safety
- Social inclusion and equality
- Housing
- Archaeological heritage
- Education, skills and training
- Culture, Sport & Recreation

8.1.4   Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of what will happen 'on the ground' as policies are implemented. The potential to identify effects accurately is also limited by understanding of the baseline.

8.1.5   Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the preferred approach in more general terms.

8.1.6   It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.[16] So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

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[16] Environmental Assessment of Plans and Programmes Regulations 2004

Added structure

8.1.1   Although, under each of the 18 topic heading, there is a need to focus on the effects of the preferred approach - as understood from the two plan documents - 'as a whole', it is helpful to break-up the appraisal under the following sub-headings:

- Strategic Policies Partial Review

- Development management policy

- Place and site specific proposals

- The emerging preferred approach 'as a whole'

8.1.2   As such, the appraisal below is presented as 72 (18 x 4) separate appraisal narratives. Within each narrative, reference is made to specific policies/proposals as necessary, but it is deemed appropriate to stop well short of giving standalone consideration to each in isolation under each topic heading.

Importantly, readers should note that, whilst the discussions under the 'Strategic Policies Partial Review' and 'Development management policy' headings are complete, the discussions under the 'Area and site specific proposals' and 'Emerging preferred approach as a whole' headings are not. These sections will be completed ahead of consultation.

Under the 'Place and site specific proposals' heading there is a need to discuss the implications of the preferred site options and also take into account some of the Place-specific policy that is set out across the two consultation documents. The preferred approach to site allocations was appraised in early summer 2015 (see Section 6.3 above), but this appraisal now requires updating.

As for the 'Emerging preferred approach as a whole' sections, these are currently in very early draft form. They will be finalised ahead of consultation, taking into account messages that come out of the 'Place and site specific proposals' discussions.

9 ECONOMIC DEVELOPMENT AND EMPLOYMENT

Sustainability objectives are to -

- Regenerate Croydon as a vital and diverse economic centre
- Encourage business opportunities in high areas of unemployment, such as the northern and south eastern wards of the Borough

9.1 Strategic Policies Partial Review

9.1.1 The 2011 Strategic Policies SA Report predicted broadly positive effects, including on the basis that: *"The cumulative effect of the policies regarding improvements to the public realm, developing sustainable transport infrastructure, improving connectivity and accessibility and facilities for local residents, are all likely to improve the image of Croydon as a place people want to live work and visit and encourage inward investment."*

9.1.2 No policies were identified as having the potential to lead to negative effects, although one tension was highlighted in that:

"There is a focus within the policies on the need to locate new development near existing centres and in locations accessible by public transport, walking and cycling. However, new development (including new housing, employment development, new community facilities and educational development) is likely to cumulatively generate some new traffic… the overall increase in traffic… could affect a wider area, such as neighbouring boroughs."

9.1.3 Policy SP3 (Employment) was given particular attention as it outlines how the Council will encourage innovation and investment in the borough, support industry and warehousing, promote the growth and expansion of cultural and creative industries and maintain the role of town centres.

9.1.4 The Partial Review proposes some notable amendments Policy SP3:

- There is an updated approach to office space retention, and development of new office space. This reflects the latest situation whereby approximately half of the office floor space in Croydon Metropolitan Centre is vacant and current low rents do not support the development of new floor space. Specifically, there is new policy support for the area around East Croydon Station and New Town performing the role of Croydon's office centre, with a new designation added to the Policy Map. Within the 'Office Retention Area' the loss of floor space will be permitted only if it is demonstrated that *"there is no demand for refurbished floorspace, a scheme with no loss of office floor space and that there is no demand for a mixed use development that includes proportionate office floor space."*

- Whilst the proposal is to maintain the '4 tier' approach to the protection of industrial capacity, there are some amendments to the policy approach (and some consequential changes made to designated locations). Notably:

  – There is a new reference to: *"The fringes of some Tier 1 and Tier 2 locations… have the potential for transition through development that enables the locations to relate better to their surrounding uses and character. This transition could come in the form of both intensification of development or the introduction of new land uses or mix of land uses."*

  – Reference to the need for mixed use developments within designated industrial locations to 'not result in a net loss of floor space' has been deleted, with the remaining policy requirement being that mixed use development: *"must not result in an increase in operational difficulties for businesses"*. Text is also added stating that: *"Where an applicant is proposing a mixed use scheme which involves a reduced amount of Industry and Warehousing space, account would be taken of the proposed end user of the Industry and Warehousing and, the nature and type of the proposal in terms of meeting the Plan's vision and the Council's Economic Development Strategy."*

– There is a new reference to Tier 2 sites (previously just Tier 4 sites were referenced) potentially being suitable for change of use to D1 Use Class activities (non-residential institutions). Ultimately, the aim is to ensure that 'Tier 1' type premises are not lost to community uses to the detriment of the area's business function (something that has occurred in the past). Change of use will only be allowed in the more accessible Tier 2 locations, and will open up a significant supply of premises for community uses/groups.

9.1.5   Finally, it is important to consider the implications of removing references to Coulsdon as broad locations for growth, and inserting new references to 'sustainable growth of the suburbs'.

• As for Coulsdon, this is an accessible location in the south of the borough, and hence it is potentially the case that there are some growth related economic opportunities. It is noted that reference to development of a Science and Business Innovation Park / Enterprise Centre at Cane Hill (an initiative first promoted through the 2006 Unitary Development Plan) is set to be deleted and the site has consent for a residential scheme.

• As for the concept of sustainable growth at the suburbs, it is not clear that this has significant implications, although benefits might result from a diversification of the borough's employment space offer.

9.2 Development management policy

9.2.1   Policies DM4 (Development in Croydon Metropolitan Centre, District and Local Centres), DM6 (Development in shopping parades) and DM8 (Development in edge of centre and out of centre locations) will support the sustainability objectives by supporting and potentially increasing the vitality and viability of Croydon's centres and shopping parades. Retailing is at the heart of the borough's town centres, and development management policy will have a key role to play in ensuring continued functioning of this role. Notably, DM6 is clear that proposals involving an increase of non-retailing ground floor space within parades will be refused unless it relates to a Community Use or change of use to office use. The reference to B1 use is important as Parades can provide space for small start-up companies who need office or workshop space (although new office development is unacceptable, as this type could threaten the retail character of a Parade in a way that change of use would not).

9.2.2   Policy DM7 (and associated change to the Policy Map) will also contribute positively to objectives by ensuring that the vitality and viability of the borough's Restaurant Quarters are maintained and increased. A survey of South End indicated that the cluster of bars and restaurants is significant not only in terms of the cultural and leisure offer, but also as a generator of direct and indirect employment. The policy differs from that which relates to Shopping Parades by not placing a limit on the number of restaurant/bar uses within the frontage. The policy also limits hot food takeaways, which could undermine function.

9.2.3   Following on from the discussion of the Strategic Policies Partial Review above, Policy DM9 is notable as it lends some support for the redevelopment of Industrial Locations at higher densities. This is intended to reduce the loss of industrial/ warehouse capacity from the borough. It is noted that there are isolated examples where higher densities have been achieved without compromising the operational ability of the premises and hence the Council is keen to see more of this type of development. However, there is some uncertainty regarding the long term implications of this policy approach.

9.2.4   Other policies will also have a bearing on economic objectives. For example Policy DM15 seeks to facilitate regeneration through enabling developing of tall buildings in appropriate locations, creating new jobs, homes and community facilities; and Policy DM27 requires new development to promote measures to increase the use of sustainable transport modes and to avoid a "severe impact" on traffic congestion will ensure that development does not detract from the economic and environmental regeneration of Croydon by making the area less accessible and a less attractive location in which to develop.

9.2.5   Finally, it is noted that Policy DM17 (Heritage assets and conservation) could perhaps give greater emphasis to the opportunities for heritage-led regeneration. The supporting text notes that the Council supports the principle of heritage-led regeneration but no other details are provided.

9.3   Place and site specific proposals

9.3.1   To be completed

9.4   The emerging preferred approach as a whole TBC in-light of Section 9.3

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

9.4.2   A number of other notable changes are set to be made to policy, essentially in response to national policy and local evidence. Designation of an Office Retention Area is a positive step on the Council's part, with no draw-backs having been identified. The proposal to modify the policy approach to protecting industrial/warehouse capacity is more contentious; however, it is recognised that London Plan Policy parameters limit the Council's options. There is currently active debate regarding the London-wide trend towards redeveloping industrial areas for mixed-use development, and so a 'watching brief' may be necessary.[17]

9.4.3   Other proposals set to be implemented through CLP1.1, and the development management and site specific policy set to be implement through CLP2… TBC

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[17] Notably, Ferm and Jones (2015, see https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf) have "grappled with the divisive question of whether or not the continued separation of industrial land is desirable [and] asked, whether it is possible, through clever urban design, to accommodate businesses currently occupying industrial land within a higher density mixed use context." Ferm and Jones conclude that: *"The ongoing loss of industrial land is being driven largely by real estate speculation rather than deindustrialisation. Evidence for the actual state of industrial land - who does business there, how those businesses are linked together and embedded in the places they occupy - is thin on the ground. This lack of information means the impact of this loss of industrial land is a worrying mystery; the current move away from separating industrial land towards mixed use in London's built environment – both on ideological grounds and in response to housing need – needs to be much better understood. There is an urgency to this. The UK Government has proposed to further deregulate the planning system to facilitate conversion of industrial land to housing without the need for planning permission. Concern is particularly acute in London where differences between industrial and residential land values are likely to drive redevelopment if Permitted Development Rights are extended."* The 'ideological argument' against separating industrial from other land uses suggests that such zoning does not support compact, diverse and vibrant city environments. This resonates with the views of the Deputy Mayor for Business and Enterprise, who Ferm and Jones quote as stating: "The idea of an industrial park is really a Modern phenomenon… what we will return to is a 19th Century model, where industry is mixed around housing." In response, Ferm and Jones state that they have "sympathy with the position of urbanists and economists who deride the concept of land use separation in the modern urban context [but] feel that in London at least the imbalance of land values and the strength of the residential property market means that we now have little alternative."

10 TRANSPORT

Sustainability objectives are to -

- Promote public transport and improve conditions for all transportation users
- Reduce greenhouse gas emissions
- Promote the use of renewable energy
- Facilitate modal shift away from the private car

10.1 Strategic Policies Partial Review

10.1.1 The 2011 Strategic Policies SA Report predicted that the spatial strategy would lead to positive effects on the basis that growth would be *"concentrated within Croydon's Metropolitan Centre, local and district centres [and thus] maximise sustainable transport opportunities and improve accessibility as existing infrastructure is in place."* The appraisal also focused on Strategic Policy SP8, which provides a strategic overview for reducing congestion and improving highway safety.

10.1.2 The Partial Review consultation document does not propose any amendments to the wording of SP8; however, some amendments to supporting text are proposed. These amendments all reflect factual updates, and specifically comprise explanations of the latest situation with regards to various infrastructure upgrades either underway or being planned by Transport for London, Network Rail or other providers. For example, it is clarified that: *"Transport for London is currently investigating potential options for improvements to Addington Village bus station and interchange."* These proposed amendments to supporting text do not reflect any new or amended policy commitments on the Council's part.

10.1.3 Another effect of the Partial Review will be to introduce a new 'Neighbourhood Centres' designation, with 18 areas identified as such on the policies map. As stated within the consultation document: *"These offer the opportunity for clusters of uses, in particular community uses, to emerge with support through planning policy. The identification of Neighbourhood Centres goes beyond recognising centres solely for their retail function, but for the wider role they play in supporting the local community."* It is fair to assume that this new policy focus will help to ensure that Neighbourhood Centres remain vibrant and well-used in the long term, helping to ensure that residents can meet a range of needs via walking or cycling, as opposed to having to travel to higher order centres (potentially by private car).

10.1.4 Finally, there is a need to consider the implications of removing references to Coulsdon as broad locations for growth, and inserting new references to 'sustainable growth of the suburbs'.

- Coulsdon District Centre has a PTAL rating of 3 (i.e. a moderate level of accessibility), but to the south of the district centre PTAL is poor (with areas of level 1 and level 0).

- Traffic is another consideration, and on this basis it is important to consider that many residents of Coulsdon would look to travel south along the A23 / M23, away from congestion hotspots.

- Sustainable growth of the suburbs should take place at a steady place over the plan period, enabling public transport infrastructure to be upgraded and hence PTAL improved. Nonetheless, the concern is that development in the early years might necessitate increased provision of private car parking and lead to entrenched car dependency. There will be an important role to be played by site/project specific transport assessment studies.

10.2 Development management policy

10.2.1 Policy DM27 (Promoting sustainable travel and reducing congestion) requires new development to promote measures to increase the use of public transport, cycling and walking and to avoid a "severe impact" on traffic congestion. Thus it should have a positive effect on a range of sustainability objectives. To give greater clarity to developers the Council should consider defining "severe impact" and the measures sought to increase the use of public transport, cycling and walking.

10.2.2 Policy DM28 (Parking in new development) will also support objectives by requiring development to "Reduce the impact of car parking in any development located in areas of good public transport accessibility" (the meaning of "reduce the impact of" could perhaps be clarified here i.e. does this simply mean provide less parking?) and "Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking". Site specific transport assessments will have an important role to play in areas of poorer PTAL, with enhanced parking acceptable where the transport assessment demonstrates that *"public transport provision will not be sufficient to service the development within the first three years following granting of planning permission, that it is not reasonable to walk or cycle to the nearest railway station, and that there is no interest from car clubs in operating from the location at the time planning permission is sought."*

10.2.3 More generally, Policy DM30 (Positive character of the places of Croydon) states the Council will support the intensification of areas where there is adequate provision of community infrastructure, good accessibility to *public transport*, open space and schools, the level of deprivation and the topography. Similarly, policy DM15 states that tall buildings should be located "within areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4 with direct public transport connections to the Croydon Opportunity Area".

10.3 Place and site specific proposals

10.3.1 To be completed

10.4 The emerging preferred approach as a whole TBC in-light of Section 10.3

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

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

10.4.3 Other proposals set to be implemented through CLP1.1, and the development management and site specific policy set to be implement through CLP2… TBC

11 ENERGY CONSUMPTION

Sustainability objectives are to -

- Reduce greenhouse gas emissions
- Increase the uptake of energy efficiency measures
- Promote the use of renewable energy
- Adaptation and resilience to climate change by minimising risk of overheating through design

11.1 Strategic Policies Partial Review

11.1.1 Recognising that car dependency / distance travelled by car is discussed within the Chapter above, the focus here is on the potential to support reduced per capita carbon emissions through the built environment, i.e. through supporting delivery of renewable or low carbon energy technologies and also energy efficiency through sustainable design and construction measures. Adopted Strategic Policy SP6 currently requires district energy networks where opportunities exist due to high heat density[18] or an increase in heat density brought about by new development. The benefits of this policy approach were recognised within the 2011 Strategic Policies SA Report.

11.1.2 The Partial Review is set to make a number of changes to Policy SP6, and the supporting text; however, these generally reflect a need to report the latest Central Government and London-specific policy context (rather than reflecting a shift in policy approach on the Council's part). However, it is noted that references to extant targets (e.g. the London Plan target of reducing CO2 emissions by 60% by 2025 and the Climate Change Act target of 80% by 2050, based on 1990 levels) are set to be removed. This approach should be reconsidered.

11.1.3 More generally, the Partial Review is set to largely reinforce the adopted spatial strategy of ensuring that Croydon Town Centre is the major focus of development. Economies of scale will be achieved and/or there will be the opportunity to coordinate individual schemes so that new buildings are connected to a district heating network fed by a combined heat and power station. Economies of scale should also increase the potential for schemes to achieve standards of sustainable design and construction that exceed requirements. The new emphasis on 'sustainable growth of the suburbs' is not thought likely to have a significant bearing in this respect.

11.2 Development management policy

11.2.1 Policy DM21 (Sustainable design and construction) has a duel focus on: A) mitigating the causes and effects of air, noise, and dust pollution and vibration; and B) requiring all major development proposals seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-site renewable energy generation. It is also noted that the supporting text to the policy refers to wider issues relevant to these objectives. It states that "Solid wall insulation will also be encouraged in existing developments where planning permission may be required"; if implemented this could significantly reduce heating requirements of the insulated buildings and thus carbon emissions from heating systems. It is recommended that the Council consider including this as part of the policy wording, otherwise it will have very limited weight in decision making.

11.2.2 With respect to the climate change adaptation objective, research has demonstrated that green space (particularly trees) can help to moderate peak temperatures on urban areas, helping to mitigate the impact of higher temperatures that are projected as a consequence of ongoing climate change. Policy DM23 (Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces) and the two other 'Green Grid' policies should therefore contribute to the borough's resilience to climate change. The link could be made more explicit, however.

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[18] 55 residential units or 1,000 m[2] commercial development per hectare

11.3   **Place and site specific proposals**

11.3.1   <mark>To be completed</mark>

11.4   **The emerging preferred approach as a whole <mark>TBC in-light of Section 11.3</mark>**

11.4.1   The intention is to reinforce the adopted strategy of concentrating growth within the Croydon Opportunity Area, which should help to ensure that opportunities to design in low carbon energy infrastructure are realised; however, it is not clear that the plan - at least through development management policy, which primarily defaults to London Plan policy - is going as far as it might to ensure that opportunities are realised. It is potentially appropriate to avoid setting overly restrictive policy at this stage (given the uncertainties that exist); however, this does highlight the need for careful monitoring… TBC

12   BIODIVERSITY, FLORA AND FAUNA

Sustainability objectives are to -

- Conserve and enhance biodiversity and the quality of the environment, including incorporating features into development such as green roofs and an appropriate range of outdoor spaces in developments
- Increase quality and range of wildlife habitats in the borough
- Increase tree cover

12.1   Strategic Policies Partial Review

12.1.1   The 2011 Strategic Policies SA Report predicted that the spatial strategy would lead to positive effects on the basis that policy *"does not identify any proposed growth within areas of greenspace and the supporting text of the policy seeks to ensure brownfield land is always considered for development in the first instance."* The report also concluded that: *"A large number of policies seek to provide protection or enhancement of open space and biodiversity. For example while specific protection is given to designated sites, policies also encourage the extension and enhancement of the Green Grid and the establishment of Urban Blue Corridors – i.e. overland flow paths, ponding areas, flood storage areas etc. Cumulatively these policies when implemented will provide protection and enhancement for biodiversity."*

12.1.2   Strategic Policy SP8 (Green Grid) was a particular focus of the 2011 appraisal, with the report stating that: *"The policy seeks to enhance access to the Green Grid for all and maximise opportunities for connectivity across the borough, but particularly in areas which are currently deficient in access to nature / and or have restricted access to public recreational space and play areas… High quality green spaces also go a long way to encouraging people to pursue healthier lifestyles through exercise such as walking, cycling and active children's play."*

12.1.3   The Partial Review does not set out to alter any biodiversity related policies, and it is unlikely to be the case that the minor shift in spatial strategy reflected in the Partial Review will have implications for biodiversity. Whilst the Croydon Policies Map is set to be updated to show c.83 new 'Local Green Spaces' this matter is dealt with through CLP2 (see discussion below).

12.2   Development management policy

12.2.1   Policy DM25 (Biodiversity) seeks to achieve protection and enhancement of biodiversity, and should contribute to all three sustainability objectives listed above. There is a focus on protecting and enhancing the borough's woodlands, trees (particularly preserved trees and trees that make a contribution to the character of the area) and hedgerows. The policy also seeks to improve access to nature by setting out a series of requirements for development proposals, including a requirement to incorporate biodiversity within/on buildings and on development sites.

12.2.2   Policy DM2 (Development on garden land) is also notable, recognising that poorly planned piecemeal development of garden land in the past has adversely impacted on local biodiversity. The policy permits new dwellings or other development within the curtilage or garden of an existing dwelling or the redevelopment of existing dwellings and their curtilage or gardens where, amongst other things, biodiversity is protected. This policy will thus also have a positive effect on biodiversity conservation.

12.2.3   Policy DM23 (Sustainable Drainage Systems and Reducing Flood Risk) supports swales, green roofs and balancing ponds, which can provide significant biodiversity benefits; however the scope to incorporate such measures (with the exception of green roofs) on dense urban sites may be limited.

12.2.4   Finally, it is important to note the criteria that have informed the identification of Local Green Spaces for designation under DM24 (Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces). Sites have been designated where at least three of the following criteria are met, or where the site is publically accessible and at least one of the criteria is met:

- Historic Park or Garden;

- Community garden;

- Children's play area;

- Tranquil area;

- Natural and semi-natural open space;

- Cemetery, church yard or burial ground;

- Site of Nature Conservation Importance; or

- Playing field or recreation ground.

12.3   Place and site specific proposals

12.3.1   To be completed

12.4   The emerging preferred approach as a whole TBC in-light of Section 12.3

12.4.1   Supporting an increase in the rate of housing growth within the borough could potentially have implications for biodiversity related objectives; however, it is noted that strict development management policy is set to be put in place to ensure the protection of urban green space (including garden land) and support the Green Grid. There might be the potential for positive effects to the biodiversity baseline; however, this is uncertain… TBC

13   WATER USE

Sustainability objectives are to -

- Encourage more efficient use of water
- Adaptation and resilience to climate change and higher population

13.1   Strategic Policies Partial Review

13.1.1   The 2011 Strategic Policies SA Report predicted that the spatial strategy would lead to positive effects on the basis that policy would lead to *"growth which will lead to an increase in demand for water supply. However, the utility companies have not raised any concerns regarding possible water resources in their representations on the IDP and Core Strategy up to the Proposed Submission Stage. Where developments which put pressure on water resources were to go ahead, this issue will need to be covered in further detail by planning and the Environmental Impact Assessment (EIA) Regulations."*

13.1.2   It is not anticipated that the increased quantum of growth supported through the Partial Review will lead to problems in terms of water supply, waste water management or the management of water resources / water quality more generally; however, plans will be scrutinised by the Environment Agency, infrastructure provides and other stakeholders through the current consultation. Account will need to be taken of the anticipated effects of climate change.

13.1.3   With regards to the efficiency of water use, the Partial Review is set to add a reference within Policy SP6 (Environment and Climate Change) to *"Requiring all new-build residential development to meet a minimum water efficiency standard of 110 litres/person/day."* This is in-line with Government's Housing Standards Review, which permits LPAs to set an optional water efficiency target of 110 l/p/d where this can be supported by evidence).[19]

13.2   Development management policy

13.2.1   The DM policies are not set to include an explicit focus on water efficiency / the need to conserve water resources in a changing climate (although see related discussions below, under the 'Drainage, flooding and water quality') heading.

13.3   Place and site specific proposals

13.3.1   To be completed

13.4   The emerging preferred approach as a whole TBC in-light of Section 13.3

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

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[19] http://www.planningportal.gov.uk/buildingregulations/approveddocuments/partg/approved

14 DRAINAGE, FLOODING AND WATER QUALITY

Sustainability objectives are to -

- Reduce pollution to water
- Reduce flood risk in vulnerable communities
- Steer vulnerable development away from areas affected by flooding
- Adaptation and resilience to climate change

14.1 Strategic Policies Partial Review

14.1.1 Flood risk is an issue within the Croydon Opportunity Area and many of the district and local centres; hence the 2011 Strategic Policies SA Report noted some uncertainty in relation to effects of the spatial strategy on flood risk. However, it also explained how the preferred approach had been improved iteratively over time, with inputs from the SA. It also found Policy SP6 (Climate Change) to perform on the basis of its clear support for Sustainable Drainage Systems (SuDS) and policy commitment to a partnership approach (with the Environment Agency, community groups, water and highways infrastructure providers, developers and other Lead Local Flood Authorities) to guard against inappropriate development within flood zones.

14.1.2 The Partial Review reflects a minor shift in spatial strategy (reduced emphasis on Coulsdon and increased emphasis on sustainable growth of the suburbs); however, it is not thought likely that this in itself has implications for flood risk. Neither is it the case that the Partial Review is set to reflect a notable shift in policy approach to flood risk management. There is, however, a notable added reference in Policy SP6 to the need to apply the Sequential Test and Exception Test 'where required', which equates to a commitment to apply it when determining planning applications at windfall sites (as opposed to at sites allocated through CLP2). Useful supporting text has been added to clarify the importance of flood risk as an issue, drawing on the 2015 Strategic Flood Risk Assessment (SFRA), and (perhaps more notably) there is added guidance on the application of SuDS. Text is now clear that even development in low flood risk areas must utilise SuDS (in view of the fact that surface water from one area of a catchment may contribute towards enhanced flood risk in another area of that catchment); and that the Level 2 SFRA and SWMP can be used to guide which SUDs will be the most suitable based on site specific considerations.

14.2 Development management policy

14.2.1 Policy DM23 (Sustainable drainage systems and reducing flood risk) should have a significant, direct positive effect on reducing flood risk (by translating NPPF and Planning Practice Guidance wording into local planning policy), including in vulnerable communities, and should also help to reduce water pollution by requiring the incorporation of SuDS in all development (such measures can help to cleanse rainwater runoff, for example by filtering out particulates). The policy states that all development should include SuDS and should achieve less than greenfield run off rate. This is an ambitious target that may not be feasible or viable to meet on some schemes, for example schemes with little or no outside space within the site boundary. The Council may want to consider rewording the policy to ensure that it is sufficiently flexible.

14.3 Place and site specific proposals

14.3.1 To be completed

14.4 The emerging preferred approach as a whole TBC in-light of Section 14.3

14.4.1 Croydon suffers from significant flood risk, having been ranked the fourth most susceptible authority in the country. On this basis, the decision to increase the rate of housing growth in the urban area (where flood risk is focused) does lead to some concerns, and it is appropriate to highlight the potential for significant negative effects. However, it is recognised that flood risk will be mitigated to a large extent through design measures - most notably by ensuring that residential uses are not located on the ground floor… TBC

15   AIR QUALITY

Sustainability objectives are to -

- Reduce emissions of pollutants to air
- Reduce greenhouse gas emissions

15.1   Strategic Policies Partial Review

15.1.1   The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *"Negative impacts were recorded against SA Objective 16 : To protect and improve air quality'. Negative impacts were identified due to the policies promotion of increasing housing stock, which could lead to an increase in travel and congestion. However, Policies SP8 (Transport and Communication) and SP1 (The Paces of Croydon) outline that new housing development will be directed and concentrated in areas highly accessible by walking and cycling and with high public transport accessibility levels or within areas where sustainable transport infrastructure can be improved. This will help mitigate predicted negative effects."*

15.1.2   Through the Partial Review there will be minor amendments to the spatial strategy, and the implications for transport and traffic are discussed above under the 'Transport' heading. Notably, the effect of an increased emphasis on 'sustainable growth at the suburbs' could be to worsen the performance of the plan in terms of supporting a shift away from car dependency, at least in the short term (i.e. until public transport infrastructure upgrades can be implemented). There could be negative implications for air quality; however, it is noted that there are other factors - e.g. the increased use of electric vehicles - that will contribute to improved air quality.

15.2   Development management policy

15.2.1   Policy DM21 (Sustainable design and construction) focuses on mitigating the causes and effects of air pollution as well as other forms of pollution, thus it should have a positive effect on these objectives relative to a baseline of no policy. The supporting text states that developers should consider measures to minimise emissions of air pollution at the design stage and should incorporate best practice in the design, construction and operation of the development. Where a development has a negative impact on air quality, developers should identify mitigation measures that will minimise or offset the emissions from the development (e.g. enhanced energy efficiency; renewable energy generation; measures that promote walking and/or cycling). Developers or architects involved in new residential development, new industrial and commercial development, or mixed use development with housing are advised to consult Croydon's Interim Planning Guidance on Improving Local Air Quality.

15.2.2   Policy DM27 (Promoting sustainable travel and reducing congestion) requires new development to promote measures to increase the use of public transport, cycling and walking and to avoid a "severe impact" on traffic congestion. Congestion and use of private transport are associated with significant emissions of pollutants to the air, hence this policy should have a positive effect on improving air quality and reducing greenhouse gas emissions.

15.3   Place and site specific proposals

15.3.1   To be completed

15.4   **The emerging preferred approach as a whole** <mark>TBC in-light of Section 15.3</mark>

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

16 WASTE

Sustainability objectives are to -
- Promote waste minimisation, recycling and composting
- Reduce greenhouse gas emissions from waste
- Increase amount of energy generated from waste

16.1 Strategic Policies Partial Review

16.1.1 The 2011 Strategic Policies SA Report noted that redevelopment and growth will lead to increased waste generation locally; however, it did not give any reason to suggest that there will be any problems with regards to sustainable waste management (i.e. management of waste 'up the waste hierarchy' with a focus on reuse, recycling and recovery of energy from waste). The Partial Review will not lead to implications for good waste management.

16.2 Development management policy

16.2.1 Policy DM13 (Refuse and recycling) is the key policy on this issue. It sets out requirements for the provision of refuse and recycling facilities within developments. Notably, the supporting text states that: *"The Council considers the layout, siting, function and design of recycling and refuse storage facilities to be of equal importance. It is important that these facilities are considered as an integral part of the development process."*

16.2.2 No other policies explicitly refer to waste, although Policy DM6 (Shopping parades) seeks to ensure that the vitality and viability of the borough's Shopping Parades places restrictions on the concentration of units in Use Class A5, justified in the supporting text based on the associated waste and delivery issues which can cause harm to residential amenity.

16.2.3 No policies refer to energy from waste, therefore the current plan would have no effect on the objective of increasing the amount of energy generated from waste. However it is noted that the South London Waste Plan (which covers Croydon and forms part of Croydon's Local Plan) includes a policy on 'sustainable energy recovery' setting out requirements for energy from waste projects. Given the existence of this policy the lack of a DM policy would seem justified, assuming a more detailed policy is not required.

16.3 Place and site specific proposals

16.3.1 To be completed

16.4 The emerging preferred approach as a whole TBC in-light of Section 16.3

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

17   NOISE

Sustainability objectives are to -

- Reduce noise pollution, including reducing the adverse impacts of noise from traffic, freight, servicing, construction and demolition

17.1   Strategic Policies Partial Review

17.1.1   The 2011 Strategic Policies SA Report noted that: *"There is a focus within the Core Strategy policies on the need to locate new development near existing centres and in locations accessible by public transport, walking and cycling. However, new development implied by the Core Strategy (including new housing, employment development, new community facilities and educational development) is likely to cumulatively generate some new traffic, increase the number of journeys in the borough and associated congestion, <u>increase noise pollution</u>, increase air pollution and increase CO2 emissions" [emphasis added].*

17.1.2   The implications of the Partial Review for traffic congestion are discussed above, under the 'Transport' and 'Air quality' headings. Whilst there might potentially be some negative implications, it is not possible to conclude any potential for these to translate into increased noise pollution. This is on the basis that any increase in traffic will not necessarily impact on sensitive noise receptors (as opposed to the situation for air quality, given that the entire borough is designated as an Air Quality Management Area). Also, it is noted that most planning applications received by the Council are assessed for the impact of environmental noise on the new development. This to ensure that the proposed development has adequate sound insulation in order to minimise the adverse impact of noise from a railway or a busy road, aircraft or an industrial activity. Residential developments close to railways and other noise sensitive sites will need a noise assessment.

17.1.3   There is perhaps also a need to consider that the increased quantum of growth supported through the Partial Review will lead to increased problems associated with environmental disturbance during the construction of major developments; however, it is not clear that Croydon is particularly sensitive or susceptible in this respect. It is noted that the Council's Code of Practice has been prepared to help developers and their contractors ensure that they undertake their works in the most considerate manner, in order to reduce the impact of the work on local communities. It also provides guidance on a Construction Logistic Plan required for major developments and the assessment of traffic movements. Also, it is noted

17.2   Development management policy

17.2.1   Policy DM21 (Sustainable design and construction) focuses on mitigating the causes and effects of noise pollution as well as other forms of pollution. The supporting text highlights the issue of noise from construction and the application of the Council's Code of Practice to help developers and their contractors to ensure that they undertake their works in the most considerate manner, in order to reduce the impact of the work on local communities.

17.2.2   Other policies also relate to control of noise, amongst other factors, though this is generally only clarified in the supporting text. These policies include DM2 (Development on garden land), DM10 (Design and character) and DM13 (Refuse and recycling).

17.3   Place and site specific proposals

17.3.1   To be completed

17.4 The emerging preferred approach as a whole TBC in-light of Section 17.3

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

18 CONSERVATION OF THE BUILT ENVIRONMENT

Sustainability objectives are to -

• Maintain and enhance the historic environment

• Bring forward investment in the historic environment for regeneration, reuse and adaptation

• Use heritage assets to provide educational opportunities and combat social exclusion

18.1 Strategic Policies Partial Review

18.1.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *"Although not significant effects, new housing provision within the Opportunity Area would enhance the image of area… [and] improve the current dated townscape which suffers with poor urban design and architecture, beneficial effects were therefore recorded against SA Objective: To retain, conserve and enhance the valued townscape and landscape features."* However, the report did highlight some spatial strategy related tensions, most notably*: "The location of the Enterprise Centre within Crystal Palace and upper Norwood should be mindful of its proposed location within a Conservation Area."*

18.1.2 The report also concluded that: "*Across the policies, there is an emphasis on improving the public realm, by ensuring high quality design, location of development and requiring sufficient open space and amenity. Cumulatively this will result in improved townscapes and public realm across the borough and will in particular improve Croydon Opportunity Area as it currently suffers with a reputation of having a dated townscape with poor urban design and architecture."*

18.1.3 Policy SP4 (Urban Design and Local Character) supports the creation of places that are well designed, safe, accessible, inclusive and enrich the quality of life for all those who live in, work in and visit the borough. It provides policy on urban design, local character and public realm; and also designates local views, Croydon Panoramas and Local Designated Landmarks so that partners might work together to protect and enhance these assets. The effect of the Partial Review will be to amend the number and extent of these designations on the Policies Map (with only three Locally Designated Views set to be de-designated entirely), but it is not clear that this reflects a policy shift in any way (rather, amendments simply reflect the latest evidence / situation on the ground).

18.1.4 Perhaps more notably, the Partial Review is set to de-designate Local Areas of Special Character and instead designate Local Heritage Areas (LHAs). LHAs are defined as "distinctive locally significant heritage assets that have been designated as a result of their heritage and architectural or townscape or landscape value. LHAs are characterised by their locally recognised distinctive and particularly high quality examples of more familiar types of local historic development. LHAs are intended to "form a more robust basis for the protection and enhancement of the borough's character and heritage."

18.1.5 Finally, there is a need to note the possible implications of an increased emphasis, through the Partial Review, on 'sustainable growth of the suburbs', with a vision statement now making reference to 'intensify' as well as 'respectfully enhance' the richness of character of Croydon's suburbs. Elsewhere, the supporting text to SP2 (Homes) is now set to reference the need to manage *"sustainable growth of the suburbs to accommodate homes to contribute to the borough's housing need and vitality and viability of centres, whilst not undermining the borough's valued character and heritage."*

18.2   Development management policy

18.2.1   Policy DM17 (Heritage assets and conservation) is the key policy and will have a significant positive effect on heritage related sustainability objectives. It will set out clear requirements to ensure that the character, appearance and setting of heritage assets within the borough is preserved and enhanced. Under the policy, historic buildings should be maintained in their original use wherever possible unless fully justified by demonstration that this is necessary to secure its long term future viability; and where a proposed change of use is fully justified, it should be demonstrated how the building's original fabric and character is to be preserved. The policy also recognises that: *"[i]n addition to the collective value of buildings and their relationship to each other, the character of conservation areas and Local Heritage Areas (LHA) may be defined by the wider townscape, land uses, public realm, open spaces, road layout or landscaped areas. This character can be relatively consistent or in larger areas may contain several 'character areas' within the conservation area or LHA. In addition to protecting individual buildings the Council will ensure that the wider character of an area is protected and enhanced."*

18.2.2   Policy DM10 (Design and character) should also contribute positively through its requirements to respect and enhance local character; to seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; and to support proposals that restore and incorporate historic street furniture within the development. More generally, the policy provides detailed guidance on scale, density massing, height, landscape, layout, materials and access. These are all factors that are important from a perspective of wishing to ensure conservation of townscape and heritage, recognising that there are existing problems, e.g. in relation to the conversion of houses into flats, and houses in multiple occupation.

18.2.3   Furthermore, Policy DM11 seeks to retain and incorporate historic shop fronts into residential conversion, recognising that "[k]ey features such as large windows, details and proportions of the shop front can make for unique, adaptable and attractive home that enhance and compliment the character of the local area."; Policy DM12 (Advertisement hoardings) seeks to restrict advertising in areas of historic character; and Policy DM16 seeks to ensure that tall or large buildings respect and enhance the local character, and do not harm the setting of heritage assets.

18.3   Place and site specific proposals

18.3.1   To be completed

18.4   The emerging preferred approach as a whole TBC in-light of Section 18.3

18.4.1   The proposed increase in the rate of growth in the urban area, and also the proposed increased emphasis on sustainable growth of the suburbs, potentially leads to some tensions with built environment and heritage objectives; however, with the development management policy in place there will be good potential to work with Historic England to ensure that design measures avoid/mitigate negative effects and result in new development that reinforces existing historic built character where possible… TBC

19 MATERIALS

Sustainability objectives are to -

- Promote and increase use of building materials that have a low environmental impact

19.1 Strategic Policies Partial Review

19.1.1 As has already been discussed above, under the 'Energy consumption' heading, the Partial Review is set to amend sustainable design and construction requirements, but this is in response to changing national and regional policy context. It is not thought that the Partial Review reflects a shift in the Council's policy position in this respect.

19.2 Development management policy

19.2.1 Policy DM10 (Design and character) requires that development proposals respect the appearance, *existing materials* and built and natural features of the surrounding area; it also states that proposals should demonstrate that *high quality durable materials* that respond to the local character are incorporated. Although the policy does not refer to the environmental impact of materials, the supporting text states that: *"When assessing proposed materials the Council will consider the quality, durability, attractiveness, sustainability, texture, colour and compatibility with existing buildings. [emphasis added]."* Similarly the supporting text to Policy DM11 (Shop front design) states that: *"The Council expects all shop front design to be of a high design quality and craftsmanship and whenever possible, use sustainable or recycled materials."* If the Council wishes this objective to be fully reflected in decision making on applications, then it is recommended that such wording by incorporated into the policies themselves so that it can carry greater weight in decision making.

19.3 Place and site specific proposals

19.3.1 To be completed

19.4 The emerging preferred approach as a whole TBC in-light of Section 19.3

19.4.1 Sustainable design and construction measures are not a major focus of policy attention, as it is deemed generally appropriate to default to standards established through the London Plan… TBC

20 HUMAN HEALTH AND WELLBEING

Sustainability objectives are to -

- Improve mental and physical wellbeing
- Support for carers and those with long term conditions
- Facilitate fair and equal access for all members of the community, including health care, education and training, jobs, community and cultural facilities
- Ensure a better living environment with enriched urban spaces, places for people that are safe, active and promote healthy communities and are adaptable to changing needs

20.1 Strategic Policies Partial Review

20.1.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *"Policy SP1 seeks to manage and direct growth to create a network of healthy places which will contribute to achieving [good health] as there is a strong relationship between levels of health deprivation in an area and the condition of the local environment. Policy SP1 may include the redevelopment of derelict sites or run-down areas in poor condition; and health can be benefited by a reduction in crime levels which may occur as a result of such regeneration. Existing poor environments can discourage people from walking to school or shops or taking exercise which can have adverse health effects, usually within particular demographic groups – children, the young and elderly. The least healthy' 65 – 74 year olds are situated in the north or south east of the borough and include Broad Green, Selhurst, West Thornton, Thornton Heath, Fieldway, and New Addington where growth and moderate growth is proposed. In Broad Green a quarter of residents aged 65 to 74 report they are not in good health, therefore this policy could potentially benefit local residents."*

20.1.2 However, in addition to these positive comments, the 2011 SA Report did also note some tensions. Specifically: *"The strategy will direct growth and intensification in areas of high accessibility (Centre and Environs). This would result in denser development, with potential negative effects in terms of health through overcrowding and stress on current infrastructure and services. However, accessibility of services may be improved with higher densities."*

20.1.3 Strategic Policy SP8 (Green Grid) was also a focus of the 2011 appraisal, with the report stating that: *"The policy seeks to enhance access to the Green Grid for all and maximise opportunities for connectivity across the borough, but particularly in areas which are currently deficient in access to nature / and or have restricted access to public recreational space and play areas… High quality green spaces also go a long way to encouraging people to pursue healthier lifestyles through exercise such as walking, cycling and active children's play. The loss of such areas could have significant adverse effects on health, particularly for more vulnerable demographic groups. The policy also seeks to ensure that existing and new open spaces are designed in an inclusive way, which will contribute in ensuring social inclusion and cohesion."*

20.1.4 The Partial Review is set to have few direct implications for health and wellbeing; although there will be indirect effects as a result of the new policy approach to affordable housing. This matter is given further consideration below, under the 'Housing' heading. Also of note is the new policy support for Neighbourhood Centres, with the intention of ensuring that they play an enhanced role as community hubs. This could potentially lead to positive effects, particularly if health centres and associated facilities increasingly recognise Neighbourhood Centres as locations to deliver integrated health care.

20.2 Development management policy

20.2.1 Many of the policies within the plan will indirectly contribute to improved health and physical wellbeing, due to the multiple social and environmental determinants of health (e.g. housing, access to green space, air quality). Examples include the policies mentioned below, as well as policies such as Policy DM21 (Sustainable design and construction) which seeks to reduce to acceptable levels the negative effects of pollution on the health and safety of users of the site or surrounding land; and Policy DM22 (Land contamination) which requires site remediation and aftercare measures where a site investigation identifies risks to human health, adjacent land uses or the local environment.

20.2.2 Croydon has strategic objectives to ensure that high quality new development both integrates respects and enhances the borough's natural environment and built heritage, to create spaces and buildings that foster safe, healthy communities. Policy DM10 (Design and character) will have a positive effect on the objective of ensuring a better living environment by ensuring that development: enhances and sensitively responds to the predominant built form; creates clear, well defined and designed public and private spaces; and delivers high quality design including high quality amenity spaces.

20.2.3 Policy DM18 (Providing and protecting community facilities) will also play an important role. The intention is to positively support access to community facilities by protecting existing provision and supporting the provision of new community facilities where these meet specified criteria. The policy provides guidance on the marketing exercise that must be carried out prior to a conclusion being reached that an existing facility is not viable, and hence is suitable for a change to a more profitable (non-community) use.

20.2.4 Another important consideration relates to ensuring provision for residential care and nursing homes for the elderly. This matter is dealt with specifically by Policy DM3, which seeks to actively shape the care home market and manage supply. As things stand, Croydon experiences a range of challenges arising from the significant number of residential and nursing care home sited in the borough. These challenges include excess demand on a range of local health and social care services which is not reflected in national funding formulae for central Government funding towards local services.

20.3 Place and site specific proposals

20.3.1 To be completed

20.4 The emerging preferred approach as a whole TBC in-light of Section 20.3

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

21 CRIME AND SAFETY

Sustainability objectives are to -

- Reduce anti-social activity, opportunities for crime and fear of crime

21.1 Strategic Policies Partial Review

21.1.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *"Beneficial effects were also recorded against many of the social SA Objectives as directing growth to Croydon's Metropolitan Centre and Places would contribute to improving pockets of deprivation <u>through improving fear of crime (safety by design)</u>, improving housing standards, improving employment opportunities, education opportunities and accessibility opportunities . This would particularly benefit those in the most deprived ward of Fieldway. [emphasis added]"*

21.1.2 Elsewhere, the report stated that: *"Policies that seek to encourage new development, improve the public realm and the layout / clarity of development, encourage walking and provide community facilities are all likely to have a cumulative beneficial effect on crime and fear of crime. This would be achieved through increased surveillance, greater opportunities and activities for Croydon's youth and improved access for all."*

21.1.3 The Partial Review does have some implications for the urban realm (see discussion above, under 'Conservation of the built environment'), but any implications for crime and safety will be indirect and marginal.

21.2 Development management policy

21.2.1 Few DM policies, or sections of supporting text, in the plan explicitly refer to crime or fear of crime or related safety issues. Exceptions include Policy DM10 (Design and character), which requires residential amenity space to comply with Croydon's Supplementary Planning Document No.3 'Designing for Community Safety', which covers safety in layout and design (including key principles such as natural surveillance, sense of ownership, defensible space and physical protection). The supporting text also highlights: the provision of sufficient lighting, in line with EU lighting uniformity requirements, to encourage greater pedestrian access, movement and reduce opportunity for undesirable behaviour; the need for good management of communal amenity space, to increase the sense of safety in a neighbourhood; and the need for Design and Access Statements to refer to 'By Design' and SPD3 Designing for Community Safety. Implementation of this policy and, by extension, the requirements of SPD3, should have a positive impact on crime and fear of crime; however there are many factors influencing crime and fear of crime and many areas where significant new development will not occur, thus the effect is not considered to be significant.

21.3 Place and site specific proposals

21.3.1 To be completed

21.4 The emerging preferred approach as a whole TBC in-light of Section 21.3

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

22   SOCIAL INCLUSION AND EQUALITY

Sustainability objectives are to -

- Create community identity and sense of place
- Promote adaptable, durable and inclusive developments

22.1   Strategic Policies Partial Review

22.1.1   The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *"Beneficial effects were also recorded against many of the social SA Objectives as directing growth to Croydon's Metropolitan Centre and Places would contribute to improving pockets of deprivation through improving fear of crime (safety by design), improving housing standards, improving employment opportunities, education opportunities and accessibility opportunities . This would particularly benefit those in the most deprived ward of Fieldway."*

22.1.2   Elsewhere, the report stated that: *"Throughout the Core Strategy policies there is an emphasis on providing amenities and services in accessible locations and protecting those that already exist. Increased amenity provision is also recognised in a number of policies, and others seek to improve non-car infrastructure. Such factors are likely to have a positive cumulative impact, particularly on currently deprived communities."*

22.1.3   However, the 2011 Strategic Policies SA Report highlighted a draw-back to Policy SP2 in that: *"The focus is very much on the Croydon Metropolitan Centre and centres along the A23, such that the development of deprived areas, such as Fieldway and Addington, were not given as much consideration."*

22.1.4   The Partial Review is set to have few direct implications for social inclusion and equality; although there will be indirect effects as a result of the new policy approach to affordable housing. This matter is given further consideration below, under the 'Housing' heading. Also of note is the new policy support for Neighbourhood Centres, with the intention of ensuring that they play an enhanced role as community hubs. Neighbourhood Centres are particularly important to those who do not have access to a car, are unable to travel far or those with a disability.

22.2   Development management policy

22.2.1   Policy DM10 (Design and character) builds on Strategic Policy SP4 by setting out detailed design principles. Similarly Policy DM14 will further contribute to the objective of creating community identity and a distinctive sense of place by promoting the provision of public art that responds to local character and "reinforces a sense of place" as part of development schemes.

22.2.2   There are fewer policy references to adaptable, durable and inclusive development in the plan, although policy DM11 does require the provision of external spaces that are "visually attractive, easily accessible and safe for all users". Paragraph 57 of the NPPF advises planning authorities to "plan positively for the achievement of high quality and inclusive design". However the London Plan already provides some strong policies on inclusive design (e.g. on lifetime homes) so the limited treatment of this issue is understandable given that there is no need to repeat these policies here. There is also limited reference to durable and adaptable design, although policy DM19 does state that the council will support applications for community facilities that "Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion". Policies in the London Plan do help to secure this objective, for example the policy requiring homes to meet Lifetime Homes standard (London Plan policy 3.9) will ensure there is significant flexibility designed in.

22.2.3   Other matters of relevance to social inclusion and equality have already been discussed above, under the 'Health and wellbeing' heading, for example the implications of Policy DM18 (Providing and protecting community facilities). It is also worth noting here that community uses are supported through Policy DM28 (Temporary car parks), which states that: *"Cultural and creative industries and community uses are considered preferable to temporary car parks [at under used and vacant spaces] as they are likely to bring greater economic and regeneration benefits to the borough. Temporary car parks are also less likely to improve the character of an area or contribute to enhancing a sense of place."*

22.3   Place and site specific proposals

22.3.1   To be completed

22.4   The emerging preferred approach as a whole TBC in-light of Section 22.3

22.4.1   The 2011 appraisal of the Strategic Policies highlighted that, whilst the broad growth strategy is set to support regeneration in many locations, there are other locations (e.g. Addington) where it is less clear that regeneration objectives will be realised. The proposal at the current time is to reduce the concentration of growth to a small extent, and so it should be the case that the effect is to ensure that more locations benefit from growth. It is noted, for example, that Addington is set to receive… TBC

23   HOUSING

Sustainability objectives are to -

- Everyone should have the opportunity to live in a decent home
- Improve housing conditions and reduce homelessness
- Plan to meet the housing requirements of the whole community, and provide greater choice and an appropriate mix in the size, type and location of housing
- Promote adaptable, durable and inclusive developments

23.1   Strategic Policies Partial Review

23.1.1   The Partial Review seeks to make provision for the London Plan Housing Target - and also leaves open the possibility of exceeding this target - however, this is essentially a low housing growth strategy in that Objectively Assessed Housing Needs will not be met in full.

23.1.2   The Partial Review also seeks to make major amendments to the Council's policy on affordable housing and 'mix of homes by size', as set out in Policy SP2. The headline changes are: a new requirement for 30% (rather than 25%) of all new homes developed in the borough over the plan period to be either affordable rented homes (homes which are up to 80% market rent) or homes for social rent to meet the borough's need; reducing the aspiration to ensure that a high proportion of new homes outside the Croydon Opportunity Area are larger family homes (from 60% to 50%); and removing the aspiration to ensure that 20% of new homes within the Croydon Opportunity Area are larger family homes. Another important change relates to the mix of affordable housing tenures that will be sought on qualifying schemes (with an increased emphasis on affordable or social rent housing, as opposed to intermediate low cost shared home ownership). This is an important step, as there is a limited current supply of social rented housing at only 18% of all households, relative to 24% for London as a whole) and there is significant homelessness.

23.1.3   Finally, there is a need to consider the approach taken through the Partial Review for making provision for Gypsy and Traveller accommodation needs. There is a need for 49 new Gypsy and Traveller pitches (a pitch being space for one mobile home) in Croydon up to 2036; however, as only 79% of the need for bricks and mortar housing will be met in the borough, the Council has determined through the Partial Review that only 79% of the need for Gypsy and Traveller pitches can be met (representing 39 new pitches).

23.2   Development management policy

23.2.1   Policy DM1 (Housing choice for sustainable communities) will protect existing supply, and secure new supply, of homes with three or more bedrooms. It builds on upon Policy SP2 by setting out the minimum requirements for sites in different settings with different levels of public transport accessibility. The need for homes for families in Croydon was identified in Croydon Strategic Housing Market Assessment (SHMA) 2015, which highlights that 50% of the future requirement for market housing is for larger homes.

23.2.2   Regarding the objective to promote adaptable, durable and inclusive developments, please refer to the commentary under 'Social Inclusion and Equality' above.

23.3   Place and site specific proposals

23.3.1   To be completed

23.4 The emerging preferred approach as a whole <mark>TBC in-light of Section 23.3</mark>

23.4.1 Important changes to affordable housing policy are set to be implemented, which are on the whole very positive (recognising that viability constraints remain, e.g. mean that the ambition of meeting affordable housing needs in full, by delivering 91% of new housing as affordable, is entirely unrealistic). However, it is noted that the approach to providing for the accommodation needs of Gypsies and Travellers is arguably sub-optimal with Croydon Local Plan: Detailed Policies and Proposals including three sites in the Metropolitan Green Belt with existing built form to minimise the tension with Green Belt policy and the purposes of the Green Belt.

24   ARCHAEOLOGICAL HERITAGE

Sustainability objectives are to -

- Maintain and enhance the historic environment
- Facilitate fair and equal access for all members of the community to education and training
- Improve educational and training facilities within the Borough
- Increase in places for children's education

24.1   Strategic Policies Partial Review

24.1.1   At present approximately a quarter of the borough is covered by Archaeological Priority Areas, which are areas that have a high likelihood of archaeological significance, and the Partial Review explains that the Council is currently working with Historic England to undertake a review of the borough's Archaeological Priority Areas to align with Historic England's (London) methodology and categorisation, which determines the likelihood of the presence of matters archaeological importance. The London Plan states that Boroughs should "include appropriate policies in their plan for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

24.2   Development management policy

24.2.1   Policy DM17 (Heritage assets and conservation) includes a requirement that: *"In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority".* This policy provides additional clarity to developers about the requirements relating to maintaining archaeological heritage.

24.3   Place and site specific proposals

24.3.1   To be completed

24.4   The emerging preferred approach as a whole TBC in-light of Section 24.3

24.4.1   Appropriate development management policy is set to be put in place to ensure that archaeological assets are given due consideration at the development management stage… TBC

25   EDUCATION, SKILLS AND TRAINING

Sustainability objectives are to -

- Promote growth of creative industries and development of centralised hub to support creative businesses
- Support temporary use of vacant buildings and sites for creative/cultural activity
- Ensure that all communities have access to leisure and recreation facilities

25.1   Strategic Policies Partial Review

25.1.1   The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: "Beneficial effects were also recorded against many of the social SA Objectives as directing growth to Croydon's Metropolitan Centre and Places would contribute to improving pockets of deprivation through improving fear of crime (safety by design), improving housing standards, improving employment opportunities, <u>education opportunities</u> and accessibility opportunities . This would particularly benefit those in the most deprived ward of Fieldway. [emphasis added]" It also found Policy SP5 (Community Facilities and Education) to score positively against the SA Objectives due to the policy's commitment to improving community facilities, including education, skills and training.

25.1.2   The Partial Review does not propose any changes to the Council's strategy,

25.2   Development management policy

25.2.1   There are no DM policies relating directly to education provision, neither is there any reference to training or apprenticeships.

25.3   Place and site specific proposals

25.3.1   To be completed

25.4   The emerging preferred approach as a whole TBC in-light of Section 25.3

25.4.1   Education, skills and training is not set to be a focus of new policy, with adopted Strategic Policies deemed to remain fit for purpose. On the basis of the evidence available, this would seem an appropriate approach… TBC

26 CULTURE, SPORT & RECREATION

Sustainability objectives are to -

- Promote growth of creative industries and development of centralised hub to support creative businesses

- Support temporary use of vacant buildings and sites for creative/cultural activity

- Ensure that all communities have access to leisure and recreation facilities

26.1 Strategic Policies Partial Review

26.1.1 One of the six headline priorities of Croydon's Sustainable Community Strategy 2013-2018 is 'A Creative City - a place noted for its culture and creativity - one of the best incubators of new artistic and sporting talent in the country'. The supporting text to SP3 (Employment) then goes on to discuss the challenge of providing the necessary facilities, identifying (amongst other things) the important role that can be played by temporary uses of vacant or underused sites. Adopted Policy SP3 itself states that the Council will support the temporary occupation of empty buildings and cleared sites by 'creative industries and cultural organisations' where they contribute to regeneration and enhance the character and vitality of the area; and the Partial Review consultation document proposes altering this slightly so as to refer to 'creative industries, cultural organisations and other meanwhile uses'.

26.2 Development management policy

26.2.1 Policy DM7 seeks to designate and ensure that the vitality and viability of the borough's Restaurant Quarters is maintained and increased and that they continue to serve local communities, thus preserving the cultural and leisure offer that such areas provide.

26.2.2 Policy DM29 (Temporary car parks) seeks to support growth of creative industries by stipulating that, for existing vacant spaces, permission will only be granted for temporary uses other than temporary car parks, with the supporting text explaining that, *"Cultural and creative industries and community uses are considered preferable to temporary car parks as they are likely to bring greater economic and regeneration benefits to the borough. Temporary car parks are also less likely to improve the character of an area or contribute to enhancing a sense of place."*

26.2.3 There are few policy references to leisure and recreation facilities although Policy DM24 (Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces) states that extensions to existing buildings in Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces should not be more than 20% of their original floor space or volume, or 100m2 (whichever is the smaller) unless they are for, amongst other uses, outdoor recreation. It is also noted that the supporting text to DM4 (Centres) states that: *"Community facilities falling within Main Retail Frontages, Secondary Retail Frontages, Shopping Parades or Restaurant Quarter Parades will not be safeguarded. However, the Frontage designations currently relating to Purley Leisure Centre, and The Phoenix Community Centre in Westow Street, SE19, have been removed in order that they remain protected community facilities"* [emphasis added].

26.3 Place and site specific proposals

26.3.1 To be completed

26.4 The emerging preferred approach as a whole TBC in-light of Section 26.3

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

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

28 INTRODUCTION (TO PART 3)

28.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SA.

29 PLAN FINALISATION

29.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012.[20] The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and potentially further appraisal work (potentially to include further appraisal of alternatives and/or site options).

29.1.2 The SA Report (as opposed to an Interim SA Report) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

29.1.3 Once the period for public representations has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. Assuming that this is the case, the Plan will be submitted for Examination. A statement setting out the main issues raised during the consultation on the Proposed Submission Plan will also be submitted, for consideration at Examination. The Council will also submit the SA Report (possibly subsequent to some updating work).

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

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

30 MONITORING

30.1.1 The SA Report must present 'measures *envisaged* concerning monitoring'. At the current time, monitoring proposals are as follows -

TBC

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[20] It is unlikely that further consultation will be necessary prior to preparing the Proposed Submission Plan; however, the possibility cannot be ruled-out. The Council will decide a course of action subsequent to the current consultation, and then will have to be prepared to adapt to an evolving situation.

APPENDIX I - DM POLICY ALTERNATIVES APPRAISAL

Building on the discussion in Sections 7.2 – 7.5 above, this appendix presents detailed alternatives appraisal findings in relation to the following policy issues:

• Residential annexes

• Advertisements hoardings

• Car and cycle parking

Appraisal methodology

For each of the options, the appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability themes / objectives / issues identified through scoping (see Part 1) as a methodological framework. **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects.

Effects are predicted taking into account the criteria presented within Regulations.[21] So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects is also a consideration.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options. 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 options will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

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[21] Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Residential annexes

(1) No policy (rely on DM10, Design and character, and SPD2 on Residential Extensions and Alterations)
(2) Residential annexes will be permitted where they:
a. Are ancillary to the main residence;
b. Are not self-contained, share communal facilities within the main dwelling, retain internal linkages with the main dwelling;
c. Have a single shared entrance with the main dwelling; and
d. Comply with the National Technical Housing Standards.

Topic	Discussion of significant effects … and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
Economic development and employment	No notable implications.	N/a	N/a
Transport	No notable implications.	N/a	N/a
Energy consumption	No notable implications.	N/a	N/a
Biodiversity, flora and fauna	No notable implications.	N/a	N/a
Water Use	No notable implications.	N/a	N/a
Drainage, flooding and water quality	No notable implications.	N/a	N/a
Air quality	No notable implications.	N/a	N/a
Waste	No notable implications.	N/a	N/a
Noise	No notable implications. It is possible that development of a residential annex would lead to increased noise generation from a site, but other policies such as Policy DM21 (Sustainable design and construction) will mitigate such impacts.	N/a	N/a
Conservation of the built environment	Residential annexes can lead to amenity issues, and hence there is merit in the option of developing a Croydon specific policy. However, the baseline approach of relying broad policy might be sufficient to ensure no adverse effects.	2	☆1
Materials	No notable implications.	N/a	N/a
Human health and wellbeing	Development of residential annexes could help to support carers and those with long term conditions by allowing them to have space private space of their own whilst being part of an existing residential unit with shared facilities. Both options would allow appropriately designed residential annexes but option 2 is considered to have the greater positive effect on this objective as it provides clarity about what criteria, specific to this issue, would need to be met to make an annex proposal acceptable in planning	2	☆1

Topic	Discussion of significant effects … and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	terms (these criteria are not set out in policy DM11 or the SPD on Residential Extensions and Alterations).		
Crime and Safety	No notable implications.	N/a	N/a
Social inclusion and equality	Allowing development of residential annexes could assist households to adapt to changing circumstances and support the development of more inclusive developments, for example by allowing older relatives and/or carers to live with a family while retaining some private space of their own. Both options would allow appropriately designed residential annexes but option 2 is considered to have the greater positive effect on this objective as it provides clarity about what criteria, specific to this issue, would need to be met to make an annex proposal acceptable in planning terms (these criteria are not set out in policy DM11 or the SPD on Residential Extensions and Alterations).	2	☆1
Housing	Development of residential annexes could contribute to providing greater choice and an appropriate mix in the size, type and location of housing. Both options would allow appropriately designed residential annexes but option 2 is considered to have the greater positive effect on this objective as it provides clarity about what criteria, specific to this issue, would need to be met to make an annex proposal acceptable in planning terms (these criteria are not set out in policy DM10 or the SPD on Residential Extensions and Alterations).	2	☆1
Archaeological heritage	No notable implications.	N/a	N/a
Education, skills and training	No notable implications.	N/a	N/a
Culture, Sport & Recreation	No notable implications.	N/a	N/a

Summary

Allowing development of residential annexes could assist households to adapt to changing circumstances and support the development of more inclusive developments, for example by allowing older relatives and/or carers to live with a family while retaining some private space of their own. Thus it contributes to health and wellbeing and social inclusion objectives. It could also contribute to providing greater choice and an appropriate mix in the size, type and location of housing. Impacts of both options on these objectives are not considered to be significant, given the small numbers of development of this nature anticipated. Option 2 is considered to outperform option 1 against all of these objectives because it provides clarity about what criteria, specific to this issue, would need to be met to make an annex proposal acceptable in planning terms (these criteria are not set out in policy DM11 or the SPD on Residential Extensions and Alterations).

Advertisement hoardings

(1) Set out criteria to ensure that advertisement hoardings positively contributes to the character and appearance of existing and new streets, and of the buildings to which they are attached		
(2) Update the existing Advertisement Hoardings & other Advertisements Supplementary Planning Guidance No.8		

Topic	Discussion of significant effects … and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
Economic development and employment	No notable implications. It is noted that advertisement hoardings can enhance the appearance and vitality of an area where they are appropriately sited and designed.	N/a	N/a
Transport	No notable implications.	N/a	N/a
Energy consumption	The options currently have no notable implications for these objectives. The effect of option 1 on these objectives could be strengthened by including a requirement that powered advertisements (e.g. illuminated signs and electronic displays) must demonstrate how energy efficiency has been maximised.	N/a	N/a
Biodiversity, flora and fauna	The options currently have no notable implications for these objectives. The effect of option 1 on these objectives could be strengthened by including a requirement that options for incorporating wildlife habitat features into the rear of advertisements are considered e.g. swift boxes, 'bug hotels'.	N/a	N/a
Water Use	No notable implications.	N/a	N/a
Drainage, flooding and water quality	No notable implications.	N/a	N/a
Air quality	No notable implications.	N/a	N/a
Waste	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Conservation of the built environment	Poorly designed and sited advertisements can detract from amenity. By ensuring that advertisement hoardings positively contribute to the character and appearance of existing and new streets, and of the buildings to which they are attached (e.g. through reinforcing visually attractive parts of the borough and ensuring that the location and size of hoardings does not harm amenity or conflict with public safety) option 1 will have a greater positive effect on this objective than option 2 (the SPD provides detailed guidance but carries less weight in decision making)	⭐1	2
Materials	No notable implications.	N/a	N/a
Human health and wellbeing	Poorly designed and sited advertisements can detract from creating a better living environment. By ensuring that advertisement hoardings positively contribute to the character and appearance of existing and new streets, and of the buildings to which they are attached (e.g. through reinforcing visually attractive parts of the borough and ensuring that the location and size of hoardings does not harm amenity or conflict with public safety)	⭐1	2

Topic	Discussion of significant effects … and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	option 1 will have a greater positive effect on this objective than option 2 (the SPD provides detailed guidance but carries less weight in decision making)		
Crime and Safety	No notable implications.	N/a	N/a
Social inclusion and equality	Poorly designed and sited advertisements can detract from creating a distinct sense of place. By ensuring that advertisement hoardings positively contribute to the character and appearance of existing and new streets, and of the buildings to which they are attached (e.g. through reinforcing the special character of heritage assets and other visually attractive parts of the borough) option 1 will have a greater positive effect on this objective than option 2 (the SPD provides detailed guidance but carries less weight in decision making)	⭐ **1**	2
Housing	No notable implications.	N/a	N/a
Archaeological heritage	No notable implications.	N/a	N/a
Education, skills and training	No notable implications.	N/a	N/a
Culture, Sport & Recreation	No notable implications. It is noted that temporary provision of advertisements on parts of vacant buildings can be an appropriate use and that these could be used to support creative/cultural activity.	N/a	N/a

Summary

The National Planning Policy Framework (NPPF) highlights the importance of the need for detailed assessment where advertisements would have an "appreciable impact on a building or on their surroundings. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts". The Advertisement and Hoardings & Other Advertisements Supplementary Planning Guidance (SPG) No.8 (February 2003) provides guidance on acceptable locations, number, scale and type of advertisements and highlights the need to ensure advertisements are sensitively located and design to minimise the impact on residential areas and on heritage assets. However it is considered that option 1 is the preferred option as having an adopted policy setting out key requirements will better ensure the protection of the character and appearance of streets and buildings, thereby supporting objectives related to human health and wellbeing and social inclusion/sense of place.

The positive effects on energy consumption and biodiversity objectives could be strengthened by including requirements within DM policy that: powered advertisements (e.g. illuminated signs and electronic displays) must demonstrate how energy efficiency has been maximised; and that options for incorporating wildlife habitat features into the rear of advertisements be considered e.g. swift boxes, 'bug hotels'.

Car and cycle parking in new development

(1) Stipulate requirements to promote sustainable growth and reduce the impact of car parking in new development, including specific car parking standards for different types of development
(2) As option 1 but with higher car parking standards in areas of low Public Transport Accessibility Level (PTAL 2 or below)

Topic	Discussion of significant effects … and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
Economic development and employment			
Transport	Both options will positively contribute to achieving transport objectives by dissuading car use and supporting roll out of electric car charging infrastructure, thus reducing greenhouse gas emissions. Option 1 is considered to have the greater positive effect as it would not allow higher levels of car parking provision in low PTAL areas and thus would contribute more to meeting transport objectives in these areas._x000D_ The supporting text refers to a need for all spaces in residential developments "to be enabled for future use by electric cars by ensuring the necessary infrastructure with the exception of actual charging points is integrated from the start". To provide clarity to developers it may be useful to clarify here exactly what infrastructure the Council expects the developer to install e.g. cabling from mains source to all parking bays?_x000D_ The effects are not judged to be significant.	⭐1	2
Energy consumption	Both options will positively contribute to reducing greenhouse gas emissions by supporting roll out of electric car charging infrastructure, thus supporting the uptake of energy efficient electric vehicles. Assuming that these are powered from a national grid that is increasingly powered by low and zero carbon technologies then greenhouse emissions savings will result. However as the scale of uptake of electric cars is uncertain the effect over the plan period is not judged to be significant.	⭐1	⭐1
Biodiversity, flora and fauna	No notable implications.	N/a	N/a
Water Use	No notable implications.	N/a	N/a
Drainage, flooding and water quality	No notable implications.	N/a	N/a
Air quality	Both options will positively contribute to reduce air pollution and greenhouse gas emissions, relative to the baseline of no policy, by supporting the uptake of energy efficient electric vehicles and dissuading use of private cars. However option 1 is considered to have the greater positive effect as it would not allow higher levels of car parking provision in low PTAL areas and thus would contribute more to meeting air quality objectives in these areas._x000D_ The effects are not judged to be significant as the scale of uptake	⭐1	2

Topic	Discussion of significant effects … and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	of electric cars is uncertain.		
Waste	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Conservation of the built environment	Car parking can impact on amenity, however it is not clear that the alternatives lead to implications.	N/a	N/a
Materials	No notable implications.	N/a	N/a
Human health and wellbeing	No notable implications.	N/a	N/a
Crime and Safety	No notable implications.	N/a	N/a
Social inclusion and equality	No notable implications.	N/a	N/a
Housing	No notable implications.	N/a	N/a
Archaeological heritage	No notable implications.	N/a	N/a
Education, skills and training	No notable implications.	N/a	N/a
Culture, Sport & Recreation	No notable implications.	N/a	N/a

Summary

Both options will positively contribute to achieving transport objectives by dissuading car use and supporting roll out of electric car charging infrastructure, thus reducing greenhouse gas emissions and improved air quality. Option 1 is considered to have the greater positive effect on transport and air quality objectives as it would not allow higher levels of car parking provision in low PTAL areas and thus would contribute more to meeting transport and air quality objectives in these areas.

Not allowing higher levels of car parking for residential development in low PTAL areas is justified by the Council on the grounds that as each area of the borough becomes more sustainable through growth it should encourage greater provision of public transport in areas that currently have a low Public Transport Accessibility Level. This line of argument is clear, however there may be a case for allowing increased parking provision in these low PTAL locations in the early part of the plan period when little growth and development of improved public transport provision will have been realised, particularly in locations where there is no car club provision and therefore residents have limited mobility options.

| **Croydon Council** |
| **Equality Analysis Form** |

| **Stage 1   Initial Risk Assessment - Decide whether a full equality** |
| **analysis is needed** |

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a "protected characteristic" differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver "social value".

Please note that the term 'change' is used here as shorthand for what requires an equality analysis. In practice, the term "change" needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1   Analysing the proposed change

1.1.1	What is the name of the change?

| **DM1: Housing Choice for Sustainable Communities** |
| **DM2: Development on Garden Land.** |
| **DM3: Residential Care and Nursing Homes.** |

1.1.2	Why are you carrying out this change? Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

| **DM1-3: Review of local plan policy; inclusive part of the Croydon Local Plan: Detailed Policies and Proposals.** |

1.1.3	What stage is your change at now?
	See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM1-3: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1	Who are your internal and external stakeholders?
	For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM1-3: Wider Community, Council Staff, Members.

1.2.2	What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

DM1: Optimising the supply of new housing. Sustain strong, successful and thriving communities. Improve health and well-being through decent homes and neighbourhoods.
DM2: Optimising the supply of new housing, by permitting development within an existing garden or curtilage.
DM3: Regulating the development of residential care and nursing homes in Croydon to meet the need for the services provided by the home in supporting with the care of the residents of Croydon.

1.2.3	Does your proposed change relate to a service area where there are known or potential equalities issues?
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

Yes: There are a number of inequalities in relation to housing regarding overcrowding, under provision of affordable housing which tend to affect some protected and vulnerable groups more than others

1.2.4	Does your proposed change relate to a service area where there are already local or national equality indicators?
	You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes. The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objectives listed below:

- Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion and in particular 'Work in partnership to provide a diverse supply of decent homes and a range of housing services that meet the lifetime needs of individuals and families and make for sustainable and thriving communities' .Encourage local people to be independent and resilience by providing responsive and accessible services offering excellent customer care and in particular 'Explore opportunities for integrated community-based health and social care services that are preventative and support people to live independently'.

1.2.5	Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage ☺	Likely Disadvantage ☹
Disability	**DM1:** This policy is likely to have a positive impact on protected groups see 1.2.3 above. **DM2&3:** These policies are likely to have a positive impact on this group. **DM3:** The provision of additional Care / Nursing homes is likely to have a positive impact on this group.	**DM1-3:** These policies are unlikely to have any significant negative impact on this group.
Race/ Ethnicity	**DM1:** This policy is likely to have a positive impact on protected groups see 1.2.3 above. **DM2-3:** These policies are unlikely to have any significant positive impact on this group.	**DM1-3:** These policies are unlikely to have any significant negative impact on this group.
Gender	**DM1-3:** These policies are unlikely to have any positive impact on this group.	**DM1-3:** These policies are unlikely to have any significant negative impact on this group.
Transgender	**DM1-3:** These policies are unlikely to have any positive impact on this group.	**DM1-3:** These policies are unlikely to have any significant negative impact on this group.
Age	**DM1&2:** These policies are likely to have any positive impact on this group. **DM3:** The provision of additional Care / Nursing homes is likely to	**DM1-3:** These policies are unlikely to have any significant negative impact on this group.

	have a positive impact on this group.	
Religion /Belief	**DM1-3:** These policies are unlikely to have any positive impact on this group.	**DM1-3:** These policies are unlikely to have any significant negative impact on this group.
Sexual Orientation	**DM1-3:** These policies are unlikely to have any significant positive impact on this group.	**DM1-3:** These policies are unlikely to have any significant negative impact on this group.
Social inclusion issues	**DM1:**The construction of three bedroom homes will provide extra housing choice for Croydon communities **DM2:** The permitting of development on curtilage and gardens will provide extra housing choice for the community. **DM3:** This policy is likely to have a positive impact on this group - will create new care sector employment opportunities in the area.	**DM1:** Three bedroomed homes may be of disadvantage to single, smaller households and those on lower incomes as they may be considered as unaffordable. **DM2 &DM3:** These policies are unlikely have any significant negative impact on this group.
Community Cohesion Issues	**DM1:** The construction of three bedroom homes will provide a housing solution that is suitable for a broad cross section of the community with diverse backgrounds. **DM2:** The permitting of development on curtilage or gardens will play a key part in providing new homes. **DM3:** The provision of extra residential care and nursing homes will create new care sector employment opportunities in the area.	**DM1:** Three bedroom homes may not be suitable and may exclude some within the community. **DM2:** Most properties with the required amount of curtilage or garden space will be bigger properties in more affluent areas. Homes built on these sites will only be affordable for the more affluent members of the community. **DM3:** The demand for such residential care / nursing homes could outweigh the number of specialist staff there are willing to locate / relocate to the area for work unless these homes are willing to provide full training / apprenticeships to their staff.
Delivering Social Value	**DM1&2:** This policy is unlikely to have a positive impact on this group. **DM3:** The provision of extra residential care / nursing homes will bring positive economic, social change to the area, by providing employment, skills and training to the area.	**DM1-3:** These policies are unlikely have any significant negative impact on this group.

1.2.6	**In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?**
	For example, geographical / area based issues, strengths or weaknesses in partnership

	working, programme planning or policy implementation

DM1: NO **DM2: NO** **DM3: NO**

1.2.7	**Would your proposed change affect any protected groups more significantly than non-protected groups?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix…..

DM1: YES. Changes may affect some protected groups more significantly, see 1.2.3 above. **DM2: NO. Any changes would affect protected and non-protected groups equally.** **DM3: YES. Permission to develop residential care/nursing homes will affect the protected groups of Age and Disability as care provision in the borough will have a direct effect on the essential services that these groups rely upon.**

1.2.8	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?** *In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

DM1: Don't Know. The proposed change is likely to help the Council in advancing equality of opportunity between people who belong to any protected groups and those who do as the construction of three bedroom homes will provide a housing solution that is suitable for a broad cross section of the community with diverse backgrounds. **DM2: No.** This policy should not help or hinder any groups with a protected characteristic. **DM3: Yes.** The proposed change is likely to help the Council in advancing equality of opportunity between people who belong to any protected groups and those who do. This policy will help those that rely on residential care services when there is sufficient need in the borough for additional services to be provided.

1.2.9	As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?
	In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM1: Yes - the proposed change likely to help the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic as it will provide a housing solution that is suitable for a broad cross section of the community with diverse backgrounds

DM2: Don't Know. Not sure if the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

DM3: Yes. The proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic. This policy will help those that rely on residential care services when there is sufficient need in the borough for additional services to be provided.

1.2.10	As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?
	In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM1-3: YES. This policy should help the Council in fostering good relations between people who belong to any protected groups and those who do not as it will result in an increase in integration.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report used in decision making, such as a Cabinet report**	**DM1&3:** A full analysis is not required as the policies will not have any adverse impact on protected groups in comparison to non-protected groups. **DM2:** No further equality analysis is required as the policy itself does not exclude any of the protected groups. There may however be an eventual affordability issue arising when new homes have been developed.

1.1 Analysing the proposed change

1.1.1	What is the name of the change?

Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres.
Policy DM5: Development in Neighbourhood Centres.
Policy DM6: Development in Shopping Parades.
Policy DM7: Development in Restaurant Quarter Parades.
Policy DM8: Development in edge of centre and out of centre locations.
Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial locations

1.1.2	Why are you carrying out this change? Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM4-9: Review of local plan policy; inclusive part of the Croydon Local Plan: Detailed Policies and Proposals.

1.1.3	What stage is your change at now? See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM4 – DM9: Preferred and Alternative Options stage of Croydon Local Plan, Detailed Policies and Proposals.

1.2 Who could be affected by the change and how

1.2.1	Who are your internal and external stakeholders? For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM4-DM9: Wider Community, Council Staff, Members.

1.2.2	What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

Policy DM4: Development & Enhancement of Croydon Metropolitan Centre, District and Local Centres.
Policy DM5: Development and enhancement of Neighbourhood Centres.
Policy DM6: Development and enhancement of Shopping Parades.
Policy DM7: Development and enhancement of Restaurant Quarter Parades.
Policy DM8: Development and enhancement of edge of centre and out of centre locations.
Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations.

1.2.3	Does your proposed change relate to a service area where there are known or potential equalities issues? Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

DM4: NO: New developments will not be permitted if they result a net loss in ground floor area.
DM5: NO: This policy seeks to maintain and enhance neighbourhood centres.
DM6: NO: This policy seeks to maintain and enhance the viability of local shopping parades.
DM7: NO: This policy seeks to maintain and enhance the viability of the boroughs Restaurant Quarters.
DM8: NO: This policy seeks to maintain and enhance the viability of the edge of town and out of town centres.
DM9: NO: This policy encourages the redevelopment of warehousing premises in strategic, separated and integrated industrial locations.
The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4	Does your proposed change relate to a service area where there are already local or national equality indicators? You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes: The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objective: Foster good community relations and cohesion by getting to know our diverse communities and understand their needs and in particular: 'Promote civic pride and a sense of belonging across Croydon by providing opportunities for people to come together and share meaningful interaction'.

1.2.5	Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹
Disability	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services. **DM9:** This policy is unlikely to have any significant positive or negative impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Race/ Ethnicity	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services. **DM9:** This policy is unlikely to have any significant positive or negative impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Gender	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services. **DM9:** This policy is unlikely to have any significant positive or negative impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Transgender	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services **DM9:** This policy is unlikely to have any significant positive or negative impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Age	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services **DM9:** This policy is unlikely to have	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.

	DM4-8	DM4-9
	any significant positive or negative impact on this group.	
Religion /Belief	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services. **DM9:** This policy is unlikely to have any significant positive or negative impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Sexual Orientation	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services **DM9:** This policy is unlikely to have any significant positive or negative impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Social inclusion issues	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services **DM9:** These policies are unlikely to have any significant positive impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Community Cohesion Issues	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services **DM9:** This policy is unlikely to have any significant positive on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.
Delivering Social Value	**DM4-8:** Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services **DM9:** This policy is unlikely to have any significant positive or negative impact on this group.	**DM4-9:** These policies are unlikely to have any significant negative impact on this group.

1.2.6	**In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?** For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

DM4-9: NO

1.2.7	**Would your proposed change affect any protected groups more significantly than non-protected groups?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix…..

DM4-9: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?** *In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

DM4-9: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	**As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?** *In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.**

DM4-9: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?** *In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

DM4-9: Don't Know: Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report used in decision making, such as a Cabinet report**	**DM4-9:** No further equality analysis is required as the policies do not have any likely significant impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1	**What is the name of the change?**

DM10: Design and Character
DM11: Shop front design and security
DM12: Advertisement Hoardings
DM13: Refuse & Recycling
DM14: Public Art
DM15: Tall & Large Buildings
DM16: Views & Landmarks
DM17: Heritage Assets & Conservation

1.1.2	**Why are you carrying out this change?** Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM 10-17: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3	**What stage is your change at now?** See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM10-17: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

1.2   Who could be affected by the change and how

1.2.1	**Who are your internal and external stakeholders?** For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM10-17: Wider Community, Council Staff, Members.

1.2.2	**What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?**

DM10: To ensure that development enhances and sensitively responds to the predominant built form improving the quality of the boroughs: public, private and semi-public spaces that reinforce local character, creating a high quality built environment, with an emphasis on cohesive design and management of landscape and a sensitive approach to architectural lighting.

DM11: To ensure that shop fronts are attractive, secure and of high quality design and remain flexible for future developments.

DM12: To ensure that advertisement hoarding positively contributes to the character and appearance of new and existing streets.

DM13: To ensure that refuse and recycling facilities are integrated in to the overall design of the borough.

DM14: To enhance and express local character.

DM15: To ensure that tall and large buildings respect and enhance the local character of the area.

DM16: Consideration given to impact of new development on local designated views and landmarks.

DM17: To preserve and enhance the character, appearance and setting of heritage assets in the borough.

1.2.3	**Does your proposed change relate to a service area where there are known or potential equalities issues?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

DM10: NO: This policy will affect all new built environment and landscaping, but will not affect any of the protected groups specifically.

DM11: NO: This policy will affect all shop frontages in the borough, but will not affect any of the protected groups specifically

DM12: NO: This policy is only applicable to advertisement hoardings.

	DM13: NO: This policy will affect the collection of refuse and recycling in the borough, but will not affect any of the protected groups specifically.

DM13: NO: This policy will affect the collection of refuse and recycling in the borough, but will not affect any of the protected groups specifically.
DM14: NO: This policy is only applicable to public art.
DM15: NO: This policy relates to the potential construction of new tall buildings in the borough.
DM16: NO: This policy only relates to designated views and landmarks.
DM17: NO: This policy only relates to applicable to the heritage assets in the borough.
The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4	Does your proposed change relate to a service area where there are already local or national equality indicators? You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

No: These policies do not relate to a service area where there are already local or national equality indicators.

1.2.5	Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage ☺	Likely Disadvantage ☹
Disability	**DM10:** This policy will help ensure that public places, private and semi-public spaces are designed to be more accessible by this group. **DM11:** This policy will help ensure shop fronts are accessible **DM12, 14, 16 &17:** These policies are unlikely to have any significant positive impact on this group. **DM13:** This policy could improve ease of access to refuse and recycling facilities for this group. **DM15:** Provides accessible space to all.	**DM10-17:** These policies are unlikely to have any significant negative impact on this group.
Race/ Ethnicity	**DM10-17:** These policies are unlikely to have a significant positive impact on this group.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.
Gender	**DM10-17:** These policies are unlikely to have a positive impact on this group.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.
Transgender	**DM10-17:** These policies are unlikely to have a positive impact on this group.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.

Age	**DM10-17:** These policies are unlikely to have a positive impact on this group.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.
Religion /Belief	**DM10-17:** These policies are unlikely to have a positive impact on this group.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.
Sexual Orientation	**DM10-17:** These policies are unlikely to have a positive impact on this group.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.
Social inclusion issues	**DM10-17:** These policies are unlikely to have a positive impact on this group.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.
Community Cohesion Issues	**DM10:** Better designed spaces could offer more opportunity for individuals to meet other members of the community. **DM11:** Better designed shop frontages will encourage the community to use their local shops. **DM12, 13, 15, 16 & 17:** These policies are unlikely to have any significant positive impact on this group. **DM14:** Public Art can potentially be used as an opportunity to bring the community together.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.
Delivering Social Value	**DM10, 12, 16:** These policies are unlikely to have any significant positive impact on this group. **DM11:** Better designed shop frontages could attract new business to the area, creating employment. **DM13:** Ease of access to enhanced refuse and recycling collection facilities could improve the cleanliness of the borough. **DM14:** Public art can enhance the attractiveness of the area and bring the community together. **DM15:** New tall buildings especially those of commercial use can bring extra employment and economic benefit to the borough. **DM17:** Preservation of heritage assets can attract visitors to the area and be of benefit to the local economy.	**DM10-17:** These policies are unlikely have any significant negative impact on this group.

1.2.6	**In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?**

	For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

DM10-17: NO.

1.2.7	**Would your proposed change affect any protected groups more significantly than non-protected groups?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix…..

DM10-17: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?** *In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

DM10-17: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	**As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?** *In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.**

DM10-17: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?
	In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM10-17: Don't Know: Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report used in decision making, such as a Cabinet report**	DM10-17: No Further equality analysis is required as these policies do not have a significant impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1	What is the name of the change?

DM18: Providing and protecting community facilities
DM19: Protecting Public Houses
DM20: Cemeteries and Burial Grounds.

1.1.2	**Why are you carrying out this change?** Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

1.1.3	**What stage is your change at now?**
	See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM18-20: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2   Who could be affected by the change and how

1.2.1	**Who are your internal and external stakeholders?**
	For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM18-20: Wider Community, Council Staff, Members & Community Groups.

1.2.2	**What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?**

DM18: To ensure that a network of community facilities providing essential public services are provided and protected consistently throughout the borough.
DM19: To ensure public houses are afforded protection in order to serve a local need
DM20: To support applications for cemeteries and burial grounds.

1.2.3	**Does your proposed change relate to a service area where there are known or potential equalities issues?**
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

DM18-20: The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4	**Does your proposed change relate to a service area where there are already local or national equality indicators?**
	You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objectives listed below: Improve empowerment and participation by strengthening partnership work with community, faith and voluntary sectors, in particular:

Encourage community cohesion and partnership by facilitating a greater community response to tough issues as a way of changing attitudes and behaviours in the workplace and wider community.

Create accessible and inclusive ways for people, including staff, to participate in council, community and civic life.

Ensure that the communications the Council produces meet the needs and preferences of individuals and can be accessed by our diverse communities.

Encourage partners from all sectors to be inclusive and accessible by working in partnership local people to remove the barriers that prevent them from participating in community and civic life.

1.2.5	Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage ☺	Likely Disadvantage ☹
Disability	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.
Gender	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.
Transgender	**DM18&19:** These policies will	**DM18-20:** These policies are

	protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	unlikely to have a significant negative impact on this group.
Age	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	**DM18&19:** These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.

Delivering Social Value	**DM18&19:** Community facilities, services and pubs provide a service in the area and employment. **DM20:** This policy is likely to have a positive impact especially on groups that may find the application process more difficult	**DM18-20:** These policies are unlikely to have a significant negative impact on this group.

1.2.6	**In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?** For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

DM18-20: NO.

1.2.7	**Would your proposed change affect any protected groups more significantly than non-protected groups?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix…..

DM18-20: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?** *In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

DM18-20: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?
	In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM18-20: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?
	In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM18-20: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report**	**DM18&19:** Community facilities, public houses and public services could potentially have an impact on residents of the borough but is unlikely to affect

Decision	Guidance	Response
	used in decision making, such as a Cabinet report	protected groups more significantly than non-protected groups. **DM20:** No Further equality analysis is required as the policy itself does have any adverse impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1	**What is the name of the change?**

DM21: Sustainable Design and Construction **DM22: Land Contamination** **DM23: Sustainable Drainage Systems & Reducing Flood Risk**

1.1.2	**Why are you carrying out this change?** Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM21-23: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3	**What stage is your change at now?** See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM21-23: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1	**Who are your internal and external stakeholders?** For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

	DM21-23: Wider Community, Council Staff, Members.

1.2.2	**What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?**

DM21: This policy will promote high standards of development and construction throughout the borough.
DM22: This policy advises how development proposals on contaminated land should be progressed.
DM23: This policy ensures that the impact caused by flooding in the borough is minimised by controlling development in areas of higher flood risk and sustainable drainage provided.

1.2.3	**Does your proposed change relate to a service area where there are known or potential equalities issues?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

DM21-23. NO. These policies relate to the quality of the construction of potential new developments in the borough.

1.2.4	**Does your proposed change relate to a service area where there are already local or national equality indicators?** You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes: The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objective:
Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion, in particular: Work in partnership to provide a diverse supply of decent homes and a range of housing services that meet the lifetime needs of individuals and families and make for sustainable and thriving communities.

1.2.5	**Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"**

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 🙂	**Likely Disadvantage** ☹
Disability	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	**DM21-23:** These policies are likely to have a positive impact on this	**DM21-23:** These policies are unlikely to have a significant

		negative impact on this group.
Gender	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Transgender	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Age	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	**DM21-23:** These policies are likely to have a positive impact on this group.	**DM21-23:** These policies are unlikely to have a significant negative impact on this group.

1.2.6	**In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?**
	For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

DM21-23: NO

1.2.7	**Would your proposed change affect any protected groups more significantly than non-protected groups?**
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix…..

DM21-23: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?**
	In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.

	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

	DM21-23: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	**As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?**
	In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM21-23: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic.

1.2.10	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?**
	In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM21-23: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3   Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report used in decision making, such as a Cabinet report**	**DM21-23:** No Further equality analysis is required as the policy does not have any adverse impact on protected groups compared to non-protected groups

1.1   Analysing the proposed change

1.1.1	**What is the name of the change?**

DM24: Metropolitan Green Belt, Metropolitan Open Land & Local Green Spaces
DM25: Biodiversity
DM26: Trees

1.1.2	**Why are you carrying out this change?** Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM24-26: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3	**What stage is your change at now?** See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM24-26: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2   Who could be affected by the change and how

1.2.1	**Who are your internal and external stakeholders?** For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM24-26: Wider Community, Council Staff, Members.

1.2.2	**What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?**

DM24: This policy assists the protection of the boroughs metropolitan green belt, metropolitan open land and local green spaces.
DM25: This policy ensures that biodiversity across the borough is enhanced and improves access to nature.
DM26: This policy protects and enhances the boroughs trees, woodlands, trees and hedgerows.

1.2.3	**Does your proposed change relate to a service area where there are known or potential equalities issues?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

DM24: NO. This policy assists the protection of metropolitan green belt and open spaces
DM25: NO. This policy seeks to improve access to nature and biodiversity across the borough.
DM26: NO. This policy protects and enhances the boroughs woodlands, trees and hedgerows.
The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4	**Does your proposed change relate to a service area where there are already local or national equality indicators?** You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

No: The proposed change does not relate to a service area where there are already equality indicators.

1.2.5	**Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"**

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage ☺	**Likely Disadvantage** ☹
Disability	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Gender	**DM24-26:** These policies are likely	**DM24-26:** These policies are

	to have a positive impact on this group.	unlikely to have a significant negative impact on this group.
Transgender	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Age	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	**DM24-DM26:** These policies are likely to have a positive impact on this group	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	**DM24-26:** These policies are likely to have a positive impact on this group.	**DM24-26:** These policies are unlikely to have a significant negative impact on this group.

| 1.2.6 | **In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?**

For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation |
|---|---|

DM24-26: NO.

| 1.2.7 | **Would your proposed change affect any protected groups more significantly than non-protected groups?**

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix….. |
|---|---|

DM24-26: DON'T KNOW. May affect some protected groups more significantly than others.

| 1.2.8 | **As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?**

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your |
|---|---|

	response

DM24-26: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?
	In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM24-26: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?
	In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM24-26: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3   Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report used in decision making, such as a Cabinet report**	**DM24-26:** No Further equality analysis is required as the policy does not have any adverse impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1	**What is the name of the change?**

DM27: Promoting sustainable travel and reducing congestion
DM28: Car & Cycle Parking in New Development
DM29: Temporary Car Parks
DM30: Telecommunications

1.1.2	**Why are you carrying out this change?** Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM27-30: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3	**What stage is your change at now?** See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM27-30: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1	**Who are your internal and external stakeholders?** For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM27-30: Wider Community, Council Staff, Members.

1.2.2	What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

DM27: To encourage the use of sustainable transport across the borough and reduce the impact of traffic congestion.
DM28: To promote sustainable growth, reduce the impact of car parking and to ensure that car parking provision does not impede public transport, emergency services, pedestrians or cyclists. To provide an adequate level of car-parking.
DM29: To enhance a sense of place and improving the character of an area, permission will only be granted for temporary uses other than temporary car parks.
DM30: To protect the metropolitan green belt by regulating the construction of telephone masts.

1.2.3	**Does your proposed change relate to a service area where there are known or potential equalities issues?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

DM27: NO. This policy encourages the use of sustainable transport across the borough.
DM28: NO. This policy aims to reduce the impact of car parking and to ensure that the provision does not impede public transport, emergency services, pedestrians or cyclists.
DM29: NO. This policy sets to improve the character of the area by granting temporary uses other than car parks.
DM30: NO. This policy protects the metropolitan greenbelt by regulating the construction of telephone masts.
The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4	**Does your proposed change relate to a service area where there are already local or national equality indicators?** You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

No: The proposed change does not relate to a service area where there are already equality indicators.

1.2.5	**Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"**

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹

Disability	**DM27-29:** Greater emphasis on sustainable transport including public transport is likely to provide better accessibility to town, district and neighbourhood centres for this group. **DM30:** This policy is unlikely to have a significant positive impact on this group.	**DM27-29:** This policy could see the reduction in car parking spaces which could have a negative impact on this group. **DM30:** This policy is unlikely to have a significant negative impact on this group.
Race/ Ethnicity	**DM27-30:** These policies are likely to have a positive impact on this group.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Gender	**DM27-30:** These policies are likely to have a positive impact on this group.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Transgender	**DM27-30:** These policies are likely to have a positive impact on this group.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Age	**DM27-29:** More sustainable transport will increase access to town, district and neighbourhood centres increasing mobility to individuals who because of age (young or old) do not drive. **DM30:** This policy is likely to have a positive impact on this group.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	**DM27-30:** These policies are likely to have a positive impact on this group.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	**DM27-30:** These policies are likely to have a positive impact on this group.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	**DM27-30:** These policies will encourage more sustainable transportation and therefore drive social interaction with using more sustainable transport methods.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	**DM27-30:** This policy will encourage more sustainable transportation and therefore drive social interaction with using more sustainable transport methods.	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	**DM27-29:** Increased mobility due to improved access to sustainable transport in the borough will make it easier for people to access different parts of the borough for work and leisure purposes which will help employment and grow the local economy. **DM30:** Better telecommunications is likely to have a positive impact in delivering social value	**DM27-30:** These policies are unlikely to have a significant negative impact on this group.

1.2.6	In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider? For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

DM:27-30: NO

1.2.7	Would your proposed change affect any protected groups more significantly than non-protected groups? Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix…..

DM27-30: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do? *In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.* Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM27-30: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic? *In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act* Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM27-30: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?
	In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM27-30:Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not.

1.3   Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report used in decision making, such as a Cabinet report**	**DM27-30:** No Further equality analysis is required as the policies do not have any adverse impact on protected groups compared to non-protected groups.

1.1   Analysing the proposed change

1.1.1	What is the name of the change?

DM31: Positive Character of the Places of Croydon
DM32: Addington
DM33: Addiscombe
DM34: Broad Green & Selhurst
DM35: Coulsdon
DM36: Croydon Opportunity Area
DM37: Crystal Palace and Upper Norwood
DM38: Kenley and Old Coulsdon
DM39: Norbury
DM40: Purley

| DM41: Sanderstead |
| DM42: Selsdon |
| DM43: Shirley |
| DM44: South Croydon |
| DM45: South Norwood & Woodside |
| DM46: Thornton Heath |
| DM47: Waddon |

| 1.1.2 | Why are you carrying out this change?
Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc. |

| DM31-47: Inclusive part of the Croydon Local Plan 2015 Local Review. |

| 1.1.3 | What stage is your change at now?
See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses. |

| DM31-47: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals. |

| Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis. |

1.2   Who could be affected by the change and how

| 1.2.1 | Who are your internal and external stakeholders?
For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community. |

| DM31-47: Wider Community, Council Staff, Members. |

| 1.2.2 | What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders? |

| DM31: To ensure that Council's aspirations and objectives for each of Croydon's 16 Places is clearly reflected in the built environment proposals and complement and enhance the positive character types identified in each of the 16 places.
DM32: To ensure that the characteristics of New Addington are respected and enhanced.
DM33: To ensure that the characteristics of Addiscombe are respected and enhanced.
DM34: To ensure that the characteristics of Broad Green and Selhurst are respected and |

enhanced

DM35: To ensure that the characteristics of Coulsdon are respected and enhanced.

DM36: To enable development opportunities; including public realm improvements, to be undertaken in a cohesive and coordinated manner a Croydon Opportunity Area Planning Framework complemented by for Fairfield, Mid Croydon, West Croydon, East Croydon and Old Town have been adopted.

DM37: Within Crystal Palace and Upper Norwood allocate sites for development.

DM38: Within Kenley and Old Coulsdon allocate sites for development.

DM39: To ensure that the characteristics of Broad Green and Selhurst are respected and enhanced.

DM40: To ensure that the characteristics of Purley are respected and enhanced.

DM41: To ensure that the characteristics of Sanderstead are respected and enhanced.

DM42: To enhance the character of Selsdon.

DM43: To retain the distinct characteristics and qualities of Shirley.

DM44: To strike a balance between enhancing the character of South Croydon and facilitating growth.

DM45: To facilitate growth and strengthen the edge of South Norwood and Woodside.

DM46: To strengthen and enhance the character, and enabling growth in Thornton Heath.

DM47: To enable development opportunities in Waddon in a coordinated and cohesive manner.

1.2.3	**Does your proposed change relate to a service area where there are known or potential equalities issues?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)

YES - There are a number of equalities issued in relation to housing, for example overcrowding and lack of affordable housing which tend to affect some protected and vulnerable groups more than others.

1.2.4	**Does your proposed change relate to a service area where there are already local or national equality indicators?** You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes: The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objective: Foster good community relations and cohesion by getting to know our diverse communities and understand their needs and in particular: 'Promote civic pride and a sense of belonging across Croydon by providing opportunities for people to come together and share meaningful interaction'.

1.2.5	**Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"**

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹
Disability	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Gender	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Transgender	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Age	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	**DM31-47:** These policies are likely to have a positive impact on this group.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	**DM31-47:** These policies are designed to protect, strengthen and enhance the characteristics of the 16 designated places of Croydon.	**DM31-47:** These policies are unlikely to have a significant negative impact on this group.

1.2.6	**In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?** For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

DM31-47:NO

1.2.7	**Would your proposed change affect any protected groups more significantly than non-protected groups?** Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix…..

DM31-47: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?** *In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

DM31-47: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	**As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?** *In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.**

DM31-47: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	**As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?** *In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.* **Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

DM31-47: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not.

1.3   Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge. **You must include this statement in any report used in decision making, such as a Cabinet report**	**DM31-47:** No Further equality analysis is required as the policies do not have any adverse impact on protected groups compared to non-protected groups
Yes, further equality analysis is required	Please state why and outline the information that you used to make this decision. Also indicate • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). **You must include this statement in any report used in decision making, such as a Cabinet report.**	
Officers that must approve this decision	**Name and position**	**Date**
Report author	Alexander Ross / Bartlett Intern.	22/07/2015
Director		

1.4   Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

Name of Officer		
Date received by Officer		Please send an acknowledgement
Should a full equality analysis be carried out?		Note the reasons for your decision

<table>
<tr><td>Stage 2   Use of evidence and consultation to identify and analyse the impact of the change</td></tr>
</table>

Use of data, research and consultation to identify and analyse the probable Impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	**Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.** This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.

2.2	**Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.**

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
			.

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source

2.3	**Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?**
	Please read the corporate public consultation guidelines before you begin: http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp.

2.4	**If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.**
	Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

Stage 3   Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1	Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action

3.2	How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?

3.3	How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

Section 4	Decision on the proposed change

4.1	Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?

Decision	Definition	Yes / No
We will not make any major amendments to the proposed change because it already includes all appropriate	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	

actions.		
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	
We will continue with the proposed change as planned because it will be within the law.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	

4.2	**Does this equality analysis have to be considered at a scheduled meeting?** If so, please give the name and date of the meeting.

Croydon Local Plan: Strategic Policies Partial Review and Detailed Policies and Proposals (Preferred and Alternative Options)

Health Impact Assessment Scoping Report

September 2015

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The Croydon Local Plan (Strategic Policies Partial Review and Detailed Policies and Proposals) Health Impact Assessment - Scoping Report - September 2015

Introduction

Background

The health and well-being of individuals is influenced by the communities in which they live. People's health is affected by the nature of their physical environment; living in poor housing, in a deprived neighbourhood with a lack of access to green spaces impacts negatively on physical and mental health.[1]

The overall vision for moving public health into the local authorities is to put health and wellbeing at the heart of everything they do, thereby helping people to lead healthier lives, both mentally and physically.[2] This means: Including health in all policies so that each decision seeks the most health benefit for the investment, and asking key questions such as "what will this do for the health and wellbeing of the population?" and "will this reduce health inequalities locally?"[3]

The Croydon Local Plan: Strategic Policies was adopted in April 2013 and sets out the spatial vision for the borough up to 2031. It contains strategic objectives and planning policies for the growth, planning and management of development in the borough. A partial review of the Strategic Policies is underway to take account of the Further Alterations to the London Plan (2015), changes to employment policies and a move from Local Areas of Special Character to Local Heritage Areas.

The Croydon Local Plan: Detailed Policies and Proposals is currently being prepared and will provide further detailed development management policies to the Strategic Policies. The plan will also contain site specific allocations for a range of uses including residential, schools, healthcare facilities, transport and gypsy and travellers. Once adopted the Detailed Policies and Proposals will replace the currently saved polices of the Croydon Unitary Development Plan.

Croydon like many other places has a number of health inequalities. The key facts and statistics surrounding some of these local health issues are highlighted in the 2015 Annual Public Health report. The Place and Public Health departments will work together to ensure health and wellbeing issues are considered and addressed in future planning activities. Croydon Local Plan: Strategic Policies – Policy SP 6 states the Plan will conserve and create spaces and buildings that foster safe, healthy and cohesive communities.

What is a Health Impact Assessment?

A Health Impact Assessment (HIA) is a combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.[4]

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[1] Fair Society, Healthy Lives: The Marmot Review (2010)
[2] Department of Health (2011) Public Health in Local Government
[3] Department of Health (2011) Public Health in Local Government
[4] European Centre for Health Policy, WHO Regional Office for Europe. Gothenburg Consensus Paper (1999)

A HIA helps ensure that health and wellbeing are being properly considered in planning policies and proposals. HIAs can be done at any stage in the development process, but are best done at the earliest stage possible.[5]

<u>Why conduct a HIA on Croydon's Local Plan?</u>

Urban planning can have a significant impact on health and wellbeing of communities because many aspects of planning can influence the social determinants of health. Planning can support the creation of healthy communities and environments through good design, promoting active travel and physical activity and providing access to facilities and services and high quality open spaces.

The Marmot Review *(Fair Society, Healthy Lives)* published in 2010 confirmed that individual health is influenced by wider determinants such as income, education, local environmental quality and employment (determinants of health). The review set out the following six policy objectives for reducing health inequalities:

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Create fair employment and good work for all
4. Ensure healthy standard of living for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill-health prevention

National Context

Marmot's objective relating to the creation and development of healthy and sustainable places and communities informs the decision to conduct a HIA on the Local Plan. There is an established national policy and guidance framework which provides the context for this work:

- Paragraph 69 of the National Planning Policy Framework (NPPF) states that the planning system can play an important role in facilitating social interaction and creating health, inclusive communities.
- The National Planning Practice Guidance (NPPG) states that local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making.
- Policy 3.2 of the London Plan: Improving health and addressing health inequalities states that the Mayor will take account of the potential impact of development proposals on health and health inequalities within London. It also states that the impact of major development proposals on health and wellbeing of communities should be considered, for example through the use of HIAs and that boroughs should monitor policies and interventions for their impact on reducing health inequalities.

Local Context

The two Local Plan documents; Strategic Policies and the Detailed Policies and Proposals are key strategy and statutory documents for local growth and development. Whilst there is no statutory requirement, conducting an HIA is considered best practice because it enables planners to engage key health and wellbeing stakeholders in the planning process to

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[5] The London Healthy Urban Development Unit (HUDU)

address the health impacts of Local Plans and development and regeneration proposals to improve health outcomes in new and existing communities.[6]

<u>Objectives of the HIA</u>

The main of objective of conducting a HIA is to ensure that where possible, the Strategic Policies and Detailed Policies and Proposals of Croydon's Local Plan actively promote health and wellbeing in the local population, reduce health inequalities and do not actively damage health and wellbeing.

Undertaking the HIA also builds upon previous work undertaken by the Spatial Planning team, Public Health and NHS partners in assessing the impact of proposed developments on existing health infrastructure and identifying where additional facilities may be required over the lifetime of the Plan. The HIA can also identify where proposed development may impact on health and wellbeing services required in the borough.

The HIA will also act as an initial test case for collaboration between the Place Department and Public Health within the Council with a view to promoting new collaborative engagements in the future.

Proposed Approach to the Health Impact Assessment

The proposed approach is to conduct a HIA of the Strategic Policies and the Detailed Policies and Proposals. The HIA will be undertaken in tandem with the production of the Strategic Policies and the Detailed Policies and Proposals and will inform the Proposed Submission and Submission versions of both documents. The HIA will be undertaken jointly with officers in the Council's Spatial Planning and Public Health teams.

<u>HIA Process</u>

The process of HIA will be informed by the 2010 Department of Health publication 'Health Impact Assessment of Government Policy'. The stages of the proposed HIA are as follows:

- Stage 1 – Screening
- Stage 2 – Identify health impacts
- Stage 3 – Identify impacts with important health outcomes
- Stage 4 – Quantify and describe impacts
- Stage 5 – Recommendations for action and monitoring

The Local Plan policies will be initially screened and assessed against four questions to determine whether or not there will be a health impact (Appendix 3, Table 1). The screening questions are below:

1. Will the policy have a direct impact on health, mental health and wellbeing?
2. Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?
3. Will the policy affect an individual's ability to improve their own health and wellbeing?
4. Will there be a change in demand for or access to health and social care services?

If the answer to any of the screening questions is yes, it is proposed that the policies are evaluated against a selection of outcomes determined to be priority areas for Croydon from

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[6] The London Healthy Urban Development Unit (2013). HUDU Planning for Health. Rapid Health Impact Assessment Tool

three sources; the first three priorities of Croydon's Joint Health and Wellbeing Strategy (Appendix 1), the Public Health Outcomes Framework (Appendix 2) and the JSNA Key Dataset produced by Croydon's public health intelligence team. It is proposed that the outcomes are selected by the stakeholders during the engagement process and the selected outcomes used to identify, quantify and describe potential health impacts. The HIA will then identify possible mitigation measures and will make recommendations which will inform the production of the Local Plan (Appendix 3, Table 2).

For the Proposals (site allocations) the HIA will assess the impact of proposed developments on the health and wellbeing of specific populations and specific places of the borough using the identified priorities and outcomes above (Appendix 3, Table 3).

The final stage of the HIA will identify recommendations for monitoring and parameters for evaluating and updating the HIA. Specifically, the evaluation process[7] will be in three parts:
- The process evaluation which will gauge the HIA's quality according to established standards and the original plan for the HIA
- The impact evaluation which will assess the HIA's impact on decision-making and its success according to the stated objectives
- The outcome evaluation which will assess the changes in health status and health determinants as the decision is implemented where feasible

Monitoring tracks indicators that can be used to inform process, impact and outcome evaluations.[8]

Timeline of the HIA

The HIA Scoping Report will be consulted on in November 2015 alongside Preferred and Alternative Options consultation on the Strategic Policies Partial Review (Preferred and Alternative Options) and the Detailed Policies and Proposals (Preferred and Alternative Options).

Once the consultation period has concluded, the HIA will take place to inform both versions of the Plan to be submitted for Examination in late 2016.

Internal and External Engagement

The HIA will be jointly undertaken by Spatial Planning and Public Health. Other stakeholders will include other Council departments such as housing, transport, environmental health and pollution. NHS partners will also be involved in the HIA process including the Croydon CCG, NHS England, NHS Property Services and Croydon Health Services NHS Trust.

The HIA Scoping Report will also be consulted on as part of the consultation on the Local Plan in November 2015. It is proposed that input from external stakeholders is captured through stakeholder meetings or focus groups on the proposed approach and elements of the HIA. These will form part of the consultation events on the Local Plan.

The stakeholders that will be targeted include representatives from voluntary and community groups as well as other groups and individuals who can provide experience and advice on the potential impact a policy may have on specific groups and how these can be mitigated.

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[7] The Pew Charitable Trusts (2014) The Health Impact Project. The HIA Process
[8] The Pew Charitable Trusts (2014) The Health Impact Project. The HIA Process

Comments are welcome on the proposed approach set out in this Scoping Report for undertaking a HIA on the Strategic Policies Partial Review and the Detailed Policies and Proposals. The Council welcomes comments on the following questions:

1. Do you agree with the Council's methodology for undertaking a Health Impact Assessment on the Strategic Policies and Detailed Policies and Proposals?
2. Do you agree with the approach to assess the Local Plan using indicators from the Croydon Joint Health and Wellbeing Strategy, the Public Health Outcomes Framework and Croydon's JSNA Key Dataset?
3. Which indicators from the Public Health Outcomes Framework are the most appropriate for the HIA? Are there any others which should be used?

Evaluating the HIA

The evaluation of the HIA will be undertaken jointly by Spatial Planning and Public Health. There will be a number of opportunities during the consultation and production process of the Strategic Policies and the Detailed Policies and Proposals to evaluate sections of the HIA. The evaluation will seek to answer the following questions:

1. Is there evidence that findings from the HIA have had an impact on revisions to the Local Plan?
2. Has the HIA improved collaboration between public health and planning?
3. Have results and recommendations from the HIA been submitted to cabinet?
4. Have the HIA results had an impact on related work in other council departments?
5. Is the HIA an essential tool to embed public health in key Council decisions?

Appendix 1 – Croydon Joint Health and Wellbeing Strategy: Priorities for action

1. Giving our children a good start in life	2. Preventing illness and injury and helping people recover	3. Preventing premature death and long term health conditions
Reduce **low birth weight**	Reduce **smoking** prevalence	Early detection and management of people at risk for **cardiovascular diseases and diabetes**
Increase **breastfeeding** initiation and prevalence	Reduce **overweight and obesity** in adults	Early detection and treatment of **cancers**
Improve the uptake of childhood **immunisations**	Reduce the harm caused by **alcohol** misuse	
Reduce **overweight and obesity** in children	Early diagnosis and treatment of **sexually transmitted infections** including HIV infection	
Improve children's **emotional and mental wellbeing**	Prevent illness and injury and promote recovery in the **over 65s**	
Reduce the proportion of **children living in poverty**		
Improve **educational attainment** in disadvantaged groups		

Appendix 2 - Public Health Outcomes Framework indicators

1 — Improving the wider determinants of health

Objective

Improvements against wider factors which affect health and wellbeing and health inequalities

Indicators

1.1 Children in poverty
1.2 School readiness
1.3 Pupil absence
1.4 First time entrants to the youth justice system
1.5 16-18 year olds not in education, employment or training
1.6 Adults with a learning disability/in contact with secondary mental health services who live in stable and appropriate accommodation
1.7 People in prison who have a mental illness or a significant mental illness
1.8 Employment for those with long-term health conditions including adults with a learning disability or who are in contact with secondary mental health services
1.9 Sickness absence rate
1.10 Killed and seriously injured casualties on England's roads
1.11 Domestic abuse
1.12 Violent crime (including sexual violence)
1.13 Re-offending levels
1.14 The percentage of the population affected by noise
1.15 Statutory homelessness
1.16 Utilisation of outdoor space for exercise/health reasons
1.17 Fuel poverty
1.18 Social isolation
1.19 Older people's perception of community safety

2 — Health improvement

Objective

People are helped to live healthy lifestyles, make healthy choices and reduce health inequalities

Indicators

2.1 Low birth weight of term babies
2.2 Breastfeeding
2.3 Smoking status at time of delivery
2.4 Under 18 conceptions
2.5 Child development at 2-2½ years
2.6 Excess weight in 4-5 and 10-11 year olds
2.7 Hospital admissions caused by unintentional and deliberate injuries in under 18s
2.8 Emotional well-being of looked after children
2.9 Smoking prevalence – 15 year olds
2.10 Self-harm
2.11 Diet
2.12 Excess weight in adults
2.13 Proportion of physically active and inactive adults
2.14 Smoking prevalence – adults (over 18s)
2.15 Successful completion of drug treatment
2.16 People entering prison with substance dependence issues who are previously not known to community treatment
2.17 Recorded diabetes
2.18 Alcohol-related admissions to hospital
2.19 Cancer diagnosed at stage 1 and 2
2.20 Cancer screening coverage
2.21 Access to non-cancer screening programmes
2.22 Take up of the NHS Health Check programme – by those eligible
2.23 Self-reported well-being
2.24 Injuries due to falls in people aged 65 and over

3 — Health protection

Objective

The population's health is protected from major incidents and other threats, whilst reducing health inequalities

Indicators

3.1 Fraction of mortality attributable to particulate air pollution
3.2 Chlamydia diagnoses (15-24 year olds)
3.3 Population vaccination coverage
3.4 People presenting with HIV at a late stage of infection
3.5 Treatment completion for Tuberculosis (TB)
3.6 Public sector organisations with a board approved sustainable development management plan
3.7 Comprehensive, agreed inter-agency plans for responding to public health incidents and emergencies

4 — Healthcare public health and preventing premature mortality

Objective

Reduced numbers of people living with preventable ill health and people dying prematurely, whilst reducing the gap between communities

Indicators

4.1 Infant mortality
4.2 Tooth decay in children aged 5
4.3 Mortality rate from causes considered preventable
4.4 Under 75 mortality rate from all cardiovascular diseases (including heart disease and stroke)
4.5 Under 75 mortality rate from cancer
4.6 Under 75 mortality rate from liver disease
4.7 Under 75 mortality rate from respiratory diseases
4.8 Mortality rate from infectious and parasitic diseases
4.9 Excess under 75 mortality rate in adults with serious mental illness
4.10 Suicide rate
4.11 Emergency readmissions within 30 days of discharge from hospital
4.12 Preventable sight loss
4.13 Health-related quality of life for older people
4.14 Hip fractures in people aged 65 and over
4.15 Excess winter deaths
4.16 Estimated diagnosis rate for people with dementia

0 — Vision

Objective

To improve and protect the nation's health and wellbeing and improve the health of the poorest fastest

Indicators

0.1 Increased life expectancy and healthy life expectancy
0.2 Reduced differences in life expectancy and healthy life expectancy between communities

Appendix 3 – Matrices for the HIA

Table 1: Screening

Strategic Objective/Policy	Will the policy have a direct impact on health, mental health and wellbeing?	Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Will the policy affect an individual's ability to improve their own health and wellbeing?	Will there be a change in demand for or access to health and social care services?	Is a Health Impact Assessment Required?

Table 2: Health Impact Assessment for Strategic Policies and Detailed Policies

Strategic Objective/Policy	Assessment of impact of policy on Croydon's health and well-being priorities	Assessment of impact of policy against relevant indicators from the PHOF	Key evidence	Recommendations

Table 3: Health Impact Assessment for Detailed Proposals

Detailed Proposal	Assessment of impact of proposal on Croydon's health and well-being priorities	Assessment of impact proposal against relevant indicators from the PHOF	Will the proposal have an impact on the health and wellbeing of the existing population/place?	Recommendations

Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)
Education evidence base

September 2015

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Croydon Local Plans – school sites

Pupil Place Projections for Primary and Secondary schools

Introduction

Croydon Council has a statutory duty to ensure that sufficient school places are available for people of statutory age across the Borough. Over the past ten years, Croydon's largest area of population growth is amongst children. The demand for additional school places in Croydon has been widely recognised as proportionately very high across the London boroughs.

The significant housing developments, particularly in the Centre and South West of the borough, are very likely to increase the number of children and young people needing a school place in the foreseeable future.

In order to meet its statutory duty to provide sufficient school place, the Council has been expanding existing schools and establishing new schools in the areas of greatest growth in demand. However, some existing schools have reached their capacity to expand; there is a limited amount of Council owned assets available for education use, therefore there is a need to secure additional sites for educational use.

Croydon Council's analysis of current and projected pupil place planning shows that the demand for pupil places will remain under significant pressure, despite the rate of demand slowing. However, whilst the rate of demand for primary places is slightly reducing as a result of a 5% drop in birth rate in 2013, the pressure felt in the primary phase is now transferring to the secondary phase.

Primary schools

Croydon has six planning areas - Central, East, North West, South, South East and South West - for primary phase pupil place planning. Two of these planning areas – Central and South West - have a specific importance to the Council's growth plan which is designed to transform the economic and social landscape of the borough. This has within it a plan for 9,500 homes in the Centre of Croydon alone, as well as a major housing development in the South West planning area. In both of these planning areas, available, appropriate and affordable school sites are few in number. Alongside this, demand for primary places continues to be at its most intense in the North West of the borough.

Additional Forms of Entry required in Year Reception.

Planning Areas	Academic Year					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Central	0FE	1FE	1FE	2FE	3FE	4FE
East	1FE	0FE	0FE	0FE	0FE	0FE
North West	5FE	6FE	7FE	8FE	8FE	9FE
South	0FE	0FE	0FE	0FE	0FE	0FE
South East	1FE	0FE	0FE	0FE	0FE	0FE
South West	1FE	2FE	2FE	3FE	4FE	5FE

    1FE = 30Places

The Specific solutions to meet demand are published in the Authority's supply strategy (please refer to 19 January 2015 Cabinet report).

In addition to the projects set out in the strategy, our projections show that we expect to need to deliver further new places to meet the demand. The specific projects to meet demand will be set out in future supply strategies, however based on current projections we have set out the number of forms of entry we will need to meet demand in future years. The exact configuration of new provision is to be determined.

We will need sites to deliver additional school places in the borough between 2018/19 and 2023/24:

- Central – Up to 4 FE required :
    - 1 new 3FE school (site required)
    - possible 1FE Permanent Expansion of an existing school
- East – possible 1FE Permanent Expansion of an existing school
- North West – Up to 9 FE required, possible configurations include:
    - 2 new 4FE schools (sites required) Or; 3 new 3FE schools (sites required)
- South – No sites projected to be required in this time frame
- South East – possible 1FE Permanent Expansion of an existing school.
- South West – Up to 5 FE required:
    - 1 new 4FE school (site required)
    - possible 1FE Permanent Expansion of an existing school

Secondary schools

Croydon has two planning areas - North and South – for secondary phase pupil place planning. Whilst there is an increase in secondary numbers, due to the establishment of 1 new 6FE school in 2014/15; 1 new 6FE school in 2015/16; a 2FE expansion in 2016/17; and plan for a new 6FE free school in 2017/18; there is capacity in the secondary estate to accommodate some of this increase over the next few years.

Additional Forms of Entry required in Year Reception.

Planning Areas	Academic Year					
	2018/19	**2019/20**	**2020/21**	**2021/22**	**2022/23**	**2023/24**
North	0FE	3FE	7FE	11FE	16FE	20FE
South	1FE	4FE	1FE	5FE	6FE	7FE

We will need sites to deliver additional school places in the borough between 2018/19 and 2023/24:

Borough wide – Up to 24 FE required (by 2022) possible configurations include:
- 2 new 8FE and 1 new 6FE school (sites required) Or; 4 new 6FE schools (sites required).

Special Educational Need (SEN)

Croydon has two planning areas – North and South – for Special Educational Needs (SEN) place planning. There is a significant shortage of places for children with SEN in Croydon, both at primary and secondary phases.

The Council's plans are to continue to expand local provision to meet increases in demand; however, there may be a need for additional sites to create new provision and to bring the existing cohorts back from out of borough places to schools within their local communities.

Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)

NHS sites evidence base

September 2015

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Croydon Local Plan- NHS sites

Introduction

The Council has worked with NHS partners to identify need for additional healthcare facilities by working with Croydon Clinical Commissioning Group (CCG), NHS Property Services, NHS England, Croydon University NHS Trust, London Healthy Urban Development Unit and Croydon Public Health. NHS partners are keen to ensure there is adequate estate in the borough to deliver current and future services needs and are working with the Council to explore the opportunities to make this possible.

Identifying need for additional facilities

To assess the impact of planned growth on existing healthcare facilities proposed housing sites, housing numbers and the phasing of development has been mapped alongside existing GPs and pharmacies to help the NHS establish the impact of proposed development on existing facilities. From this information, NHS partners have been able to identify where future demand may arise for each of the CCG's six GP networks.

There is a known increase in the population, a shortfall in GP practice floorspace and a health strategy to move care closer to home, all impacting on the delivery of health services in the future. The CCG is developing its Estates Strategy which will help better understand the estate's needs. The potential opportunities for healthcare facilities identified in the Croydon Local Plan: Detailed Policies and Proposals are based on the current knowns and assumptions set out in this evidence base document. NHS partners will be undertaking reviews of the feasibility of these opportunities, as well as potentially seeking other opportunities through the development of the Estate Strategy. The reviews will include an understanding in greater detail of the future level of growth, the future health needs and affordability.

Future need for healthcare floorspace

GP network	Future healthcare floorspace requirements (m2)
Mayday	1,802
Thornton Heath	2,363
Woodside/Shirley	2,561
New Addington/Selsdon	2,218
Purley	3,172
East Croydon	3,832

Map of GP networks