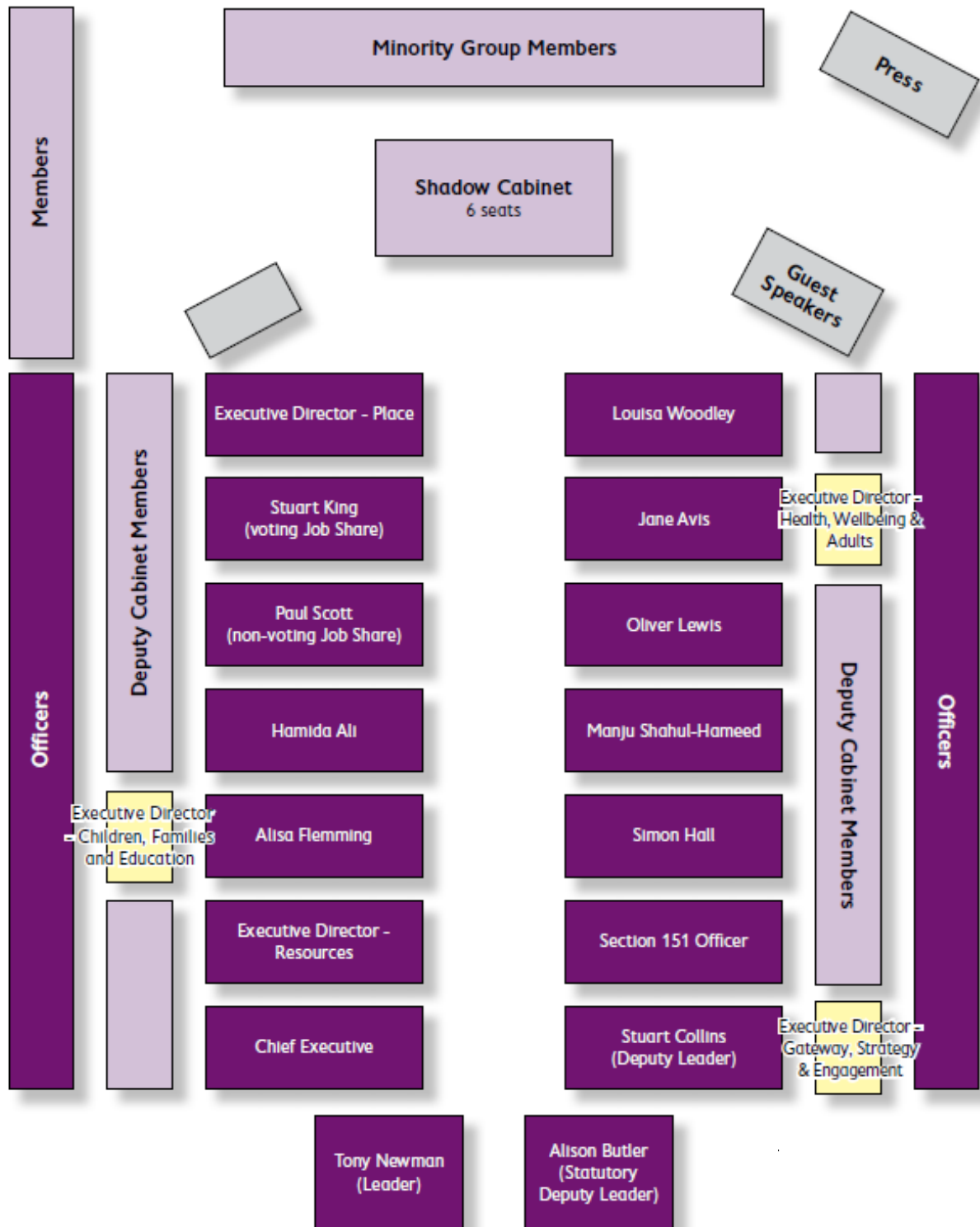




**CABINET  
AGENDA**  
for the meeting  
on  
21 October 2019 at  
6.30 pm

# Cabinet Seating Plan



**To: Croydon Cabinet Members:**

Councillor Tony Newman, Leader of the Council - Budget and Strategic Policy

Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes & Gateway Services

Councillor Stuart Collins, Deputy Leader and Cabinet Member for Clean Green Croydon

Councillor Hamida Ali, Cabinet Member for Safer Croydon & Communities

Councillor Jane Avis, Cabinet Member for Families, Health & Social Care

Councillor Alisa Flemming, Cabinet Member for Children, Young People & Learning

Councillor Simon Hall, Cabinet Member for Finance & Resources

Councillor Stuart King, Cabinet Member for Environment, Transport & Regeneration (Voting - Job Share)

Councillor Oliver Lewis, Cabinet Member for Culture, Leisure & Sport

Councillor Paul Scott, Cabinet Member for Environment, Transport & Regeneration (Non-Voting - Job Share)

Councillor Manju Shahul-Hameed, Cabinet Member for Economy and Jobs

Invited participants:

Councillor Louisa Woodley, Chair of the Health & Wellbeing Board

All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Monday, 21 October 2019** at **6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

JACQUELINE HARRIS BAKER  
Council Solicitor and Monitoring Officer  
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11 October 2019

Members of the public are welcome to attend this meeting. If you require any assistance, please contact officer as detailed above.

The meeting webcast can be viewed here: <http://webcasting.croydon.gov.uk>

The agenda papers are available on the Council website

[www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)

## **AGENDA – PART A**

**1. Apologies for Absence**

**2. Minutes of the previous meeting (Pages 7 - 22)**

To approve the minutes of the meeting held on 19 September 2019 as an accurate record.

**3. Disclosure of Interests**

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

**4. Urgent Business (If any)**

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

**Cabinet Member: Leader of the Council**

**5. A Sustainable Croydon Update - Citizen's Assembly (Pages 23 - 30)**

Officer: Shifa Mustafa

Key decision: No

**Cabinet Member: Cabinet Member for Clean Green Croydon**

**6. Don't Mess with Croydon Campaign Update (Pages 31 - 38)**

Officer: Shifa Mustafa

Key decision: No

**Cabinet Member: Cabinet Member for Safer Croydon & Communities**

7. **Croydon Public Safety CCTV Upgrade** (Pages 39 - 74)  
Officer: Shifa Mustafa  
Key decision: Yes

**Cabinet Member: Cabinet Member for Homes & Gateway Services**

8. **A Housing and Homelessness Strategy for Croydon** (Pages 75 - 96)  
Officer: Hazel Simmonds  
Key decision: Yes

**Cabinet Member: Cabinet Member for Homes & Gateway Services**

9. **Consultation on proposals to renew private sector housing Selective Licensing Scheme in Croydon** (Pages 97 - 164)  
Officer: Shifa Mustafa  
Key decision: Yes

**Cabinet Member: Leader of the Council**

10. **Celebrating and Supporting Croydon's BAME Residents** (Pages 165 - 192)  
Officer: Hazel Simmonds  
Key decision: No

**Cabinet Member: Cabinet Member for Children, Young People & Learning**

11. **Section 75 Partnership Agreement for Public Health Nursing** (Pages 193 - 212)  
Officer: Robert Henderson  
Key decision: Yes

**Cabinet Member: Cabinet Member for Environment, Transport & Regeneration (Job Share)**

12. **Issues and Options Consultation on the Croydon Local Plan Review** (Pages 213 - 492)  
Officer: Shifa Mustafa  
Key decision: Yes

**Cabinet Member: Cabinet Member for Environment, Transport & Regeneration (Job Share)**

13. **Issues and Preferred Options Consultation on the Draft South London Waste Plan** (Pages 493 - 910)  
Officer: Shifa Mustafa  
Key decision: Yes

**Cabinet Member: Cabinet Member for Finance & Resources**

**14. Investing in our Borough (Pages 911 - 918)**

Officer: Jacqueline Harris Baker

Key decision: No

**Cabinet Member: Cabinet Member for Finance & Resources**

**a) Variation to the Contract for the Provision of a Managed Service for Temporary Agency Resources (Pages 919 - 926)**

Officer: Jacqueline Harris Baker

Key decision: No

**15. Exclusion of the Press and Public**

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

## Cabinet

Meeting held on Thursday, 19 September 2019 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

### MINUTES

**Present:** Councillor Tony Newman (Chair); Alison Butler, Stuart Collins, Hamida Ali, Jane Avis, Alisa Flemming, Simon Hall, Stuart King (Job Share - voting), Paul Scott (Job Share - non voting) and Manju Shahul-Hameed

**Also Present:** Councillors Jason Cummings, Jason Perry, Maria Gatland, Lynne Hale, Simon Hoar, Yvette Hopley, Vidhi Mohan, Sean Fitzsimons, Robert Ward, Janet Campbell, Leila Ben-Hassel, Bernadette Khan, Shafi Khan, Pat Ryan and Louisa Woodley

**Apologies:** Councillors Oliver Lewis and Mario Creatura

### PART A

68/19 **Minutes of the previous meeting**

The part A minutes of the Cabinet meeting held on 8 July 2019 were agreed. The Leader of the Council signed the minutes as an accurate record.

69/19 **Disclosure of Interests**

There were none.

70/19 **Urgent Business (If any)**

There were no items of urgent business.

71/19 **A Sustainable Croydon Update**

The Leader of the Council introduced the report and explained that this was a hugely important area as Croydon Council had announced a climate emergency in June 2019, along with approximately 100 other local authorities. The Council was taking two significant steps: to introduce a Citizen's Assembly to the Borough, to ensure the area was well represented and working with the Council to feed into the process; and to look at larger topics, such as infrastructure. Further reports would be presented to future Cabinet meetings. The Leader stated that there had been a climate change event held at Boxpark, Croydon, which had been powerfully led by the future generation.

The Headteacher of Norwood Grove Preschool, Ms. Joan Runcorn, addressed the Cabinet and explained that the school had been working hard to teach the students the importance of recycling. She noted a few of the changes the school had made to become sustainable; the children had begun growing fruit trees in the garden, recycled pens and pencils were used, and milk bottles had changed from plastic to glass.

A student of Norwood Grove Preschool, Delilah Duits, spoke to the Cabinet and explained that she had come to the meeting on her bicycle, as it was better for the environment, and stated that pollution was lethal. She noted that trees were crucial for us to breathe, adding that her great uncle in France had difficulties breathing due to pollution.

The Headteacher of Norwood Grove Preschool expressed how pleased the parents were of their child's growing interest in pollution, recycling and cleaning parks. It was important that children were safe and she would like to work collaboratively with Croydon Council to continue the work within the school.

The Leader of the Council thanked Ms Runcorn and Ms Duits for speaking at the Cabinet meeting and noted the importance of the work they were doing.

The Cabinet Member for Families, Health & Social Care thanked the speakers for their fantastic work. She noted that improving eating habits would contribute to a sustainable society and the United Nations IPCC (Intergovernmental Panel on Climate Change) encouraged eating less red meat to reduce climate change. There had been an increase of pescatarians, vegetarians and vegans, especially with the younger generations. She added that everybody needed to take part in improving the environment, and she had planted 20 trees in her own garden so far.

The Acting Cabinet Member for Environment, Transport & Regeneration (Job Share) thanked the Cabinet Member for Families, Health & Social Care for her contribution and important work in linking up different services within the Council to align public health, including healthy living, with the environment. He noted that climate concern was an active concern, especially with the younger generation, and the Council was right to listen to the demands being made and to respond to them. Schools were an important contributor to the change as it was a topic important to the children, and both parents and teachers were advocates for this. The improvement of the air quality around schools was important and parents/carers were considering this as a factor when choosing which school to send their children to.

The Acting Cabinet Member for Environment, Transport & Regeneration (Job Share) stated that there was £250,000 available in the Green Fund for individuals, community groups and schools which would be launched in October 2019. Norwood Grove Preschool had started their community garden which grew fresh fruit and vegetables, and Ms Runcorn had



helped shape the Croydon Green Fund and promoted it by speaking at the climate change event in Boxpark.

The Leader of the Council stated that there was a health and climate emergency and young people were supporting the action being taken and urging politicians to go further and at pace, which he strongly supported.

The Cabinet Member for Children, Young People & Learning supported the comments made by her colleagues and added that there was a need to focus on the human response to climate change, rather than statistics. Her son had recently been admitted to hospital with breathing difficulties, and this had reiterated why the work around climate change was so crucial. The Council needed to look at the problems across the world, highlighting the Bahamas and Amazon Rainforest, and to not just focus on the Borough. She concluded by recommending a book called Climate Justice by Mary Robinson, which outlined small changes that could be made in your personal life.

The Shadow Cabinet Member for Children, Families, Young People & Learning supported the aims outlined in the report and congratulated all the young people who had expressed their concerns to politicians. She echoed and agreed with the Cabinet Member for Families, Health & Social Care regarding healthy eating as it was a huge contributor to the environment, and noted that she had become a vegetarian and was exploring veganism. She added that there was a need for protection and attention of trees, parks and wooded areas.

The Cabinet Member for Clean Green Croydon noted that it was important to engage with young people and encourage small changes, such as using reusable cups as it was important to reduce the waste being created. He expressed concern for politicians in influential countries stating that climate change did not exist. He thanked Croydon constituents for their patience with the changes to bins and recycling and noted that it was a difficult decision to reduce the size of wheelie bins to encourage recycling; however, there had been a 48% rise of recycling rate and over 13,000 tonnes of waste had been diverted from landfill sites to recycling. The week commencing 23 September 2019 was National Recycling Week, and as the Chair of the South London Waste Partnership Joint Committee he had been part of the creation of a recycling video, which shows the journey of recycling in Croydon and the benefits. He would also be visiting local schools to discuss recycling during the week. Finally, he noted the importance of refillables and encouraging businesses to reduce their plastic waste.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

**RESOLVED:** To note the contents of the report ahead of a more detailed report coming to October 2019 Cabinet in response to the declaration of a Climate and Ecological Emergency at July 2019 Council.

## **Brexit No Deal Preparedness**

The Leader of the Council introduced the report and paid tribute to the officers in Croydon Council and across London who had been working hard to mitigate the effects of Brexit. He noted that it was a hugely worrying time but the Council had a responsibility and needed to work on reassuring the residents of the Borough. The Prime Minister was due to state if a deal had been reached shortly and Parliament would return in October 2019 whether a deal had been agreed or not.

The Place Manager of NHS Croydon, Matthew Kershaw, addressed the Cabinet and explained that the key areas the NHS had been focusing on in regards to Brexit were; members of staff who were not EU nationals, supplies within the NHS, and research.

The Place Manager explained that there was just over 300 people employed within the Croydon NHS who were not EU nationals and they had all been spoken to and offered support if they wished to apply for settled status. He noted the importance of making the staff feel valued, and recently 300 additional nursing staff had been employed to support the organisation, largely from overseas. Croydon NHS were in a good position and were able to respond accordingly if necessary.

It was explained to the Cabinet that there was an in-house national team working on Brexit and they were leading on the supplies within the NHS. It was important to not stockpile medication or supplies as this could cause a shortage; stock levels were being maintained at the normal level. Medication, medical equipment and other supplies could be receipted 24/7, and this was supported by the Supplies Team. There were concerns for supplies, but the Place Manager noted that they were prepared and would be able to tend to patient's needs.

Croydon University Hospital (CUH) was one of the largest researchers in the UK who were not a teaching hospital. Extensive research had been completed, including European research, which had contributed with making appropriate arrangements in the current period.

The Place Manager explained that Croydon have the resources for overseas patients visiting the hospital and there were ongoing conversations with the National Team to support this. The Overseas Team would be overseeing the treatment for EU nationals within hospital in case the situation changes; therefore, the hospital would be able to respond to this.

The Place Manager concluded by noting that the timing of a no-deal was significant as it was previously scheduled for March 2019 and this would have been in a slightly less challenging time for the hospitals. However, despite having more time to prepare since March, the timing of a potential

no-deal Brexit would be additionally challenging as it would be during the winter period.

The Leader of the Council thanked Croydon NHS for their hard work and Mr Kershaw for addressing the Cabinet. He invited everybody to the EU Citizens' Rights & Brexit event being held in the Braithwaite Hall on Monday 23 September at 1800 hours.

Councillor Leila Ben-Hassel addressed the Cabinet in her capacity as the Council's European Champion, rather than a Local Councillor, and thanked the Leader for the report and ongoing work by the Council officers. She noted the importance of raising awareness regarding Brexit and the concern for the damage caused by the media and released government messages; she specified the messages publicised on local transport posters.

Ms Maria Klos introduced herself to the Cabinet and outlined her family background; she was half British and half Polish and had lived in Croydon her whole life, and raised her family locally. Her family lived in Warsaw during World War II until her parent came to Britain as a child refugee. She noted that when Poland joined the European Union in 2004 she felt both sides of her family were united in freedom. After Brexit, Ms Klos explained that she had felt betrayed by the residents of the United Kingdom; that her education and work had been worthless, which resulted in her being diagnosed with depression in 2018. She expressed concern for her family friend's health being impacted by Brexit; she had become a German citizen to protect her access to health supplies as she was terrified that she would need to purchase her medication after Brexit had been implemented. Ms Klos had joined Croydon for Europe and had spoken to hundreds of people; the experience had so far been eye opening as residents were relaying stories of abuse they had been receiving. She concluded by stating that Brexit made her feel like a stranger in her own country and own town.

Mr Bill Smoker introduced himself to the Cabinet and explained that Brexit had caused the rise of the extreme and far right. He noted concern for the EU citizens; some people from the EU had lived in Britain for decades without having concerns for their citizenship and now had an uncertain future. Since joining Croydon for Europe Mr Smoker had connected with a lot of EU residents who were not applying for citizenship as they were concerned about how their application would be treated, through defiance, and in the hope Brexit would not happen; he stated that it should be a case of registration, not application. Mr Smoker's wife was from Finland and had resided in Britain for 30 years, raised two children in the British education system and now needed to apply for citizenship. He explained that Croydon Council had been helpful to EU residents, especially during the EU elections when the Elections Team had sent forms for EU nationals to complete to enable them to vote and had actively chased these when not receiving a completed copy; unfortunately, other Councils had not done this. He suggested that the information on the Croydon

Council website could be refreshed and a second EU Citizens' Rights & Brexit event should be organised with more notice. Mr Smoker concluded by reading an extract from the book "*In Limbo: Brexit testimonies from EU citizens in the UK*", highlighting a story of a family who no longer had a country called home.

The Leader thanked the speakers and noted that 55% of Croydon residents voted for remain and it was an inclusive place. He would look at organising future events for EU residents; however, he was unsure of when these could be in the near future as there could be General Election called.

The Cabinet Member for Economy and Jobs thanked the guest speakers for the emotional stories they shared. She noted the large impact Brexit was having on businesses and employment and that there was new information being reported daily through the media. The Get Ready for Brexit event had been held for local businesses who traded internationally and she had been working closely with partners and local employers in the health and social care sectors. The London Mayor, Sadiq Khan, was preparing for Brexit and the GLA (Greater London Authority) had set up a Brexit support hub. She had attended the previous Coast to Capital Annual General Meeting where it was stated that three local authorities had seen business growth higher than nationally reported, and the London Borough of Croydon was number one.

The Cabinet Member for Safer Croydon & Communities thanked the guest speakers for sharing their concerns and noted that there had been a rise of abuse and hate crime due to Brexit. Councillor Hamida Ali and the Leader had had discussions with the BCU Commander regarding the preparation for the rise in hate crime after a no-deal Brexit, similar to that of after the Referendum. She noted the anti-hate crime pledge which made a statement that there was no place for hate crime in Croydon; 350 individuals had signed up to it, in addition to 30 organisations representing staff in Croydon.

The Shadow Cabinet Member for Health & Social Care thanked the speakers for sharing their emotional stories and noted that she was from an international background; her mother was born in India and her family were from across different areas of Europe. She noted the importance of inclusivity and that the Conservative Councillors were in support of this. She thanked Matthew Kershaw for speaking at Cabinet and for the huge amount of work and future planning which had been completed; there was a high percentage of residents who were living and working at the Croydon University Hospital and the Borough was in a unique position due to this.

*Councillor Simon Hoar entered the Council Chamber at 1942 hours.*

The Cabinet Member for Clean Green Croydon noted that there was a large impact on local businesses because of Brexit, including Veolia. He

explained that recycling was transported across Europe and was often needed to be transferred quickly; if the issues at the ports were not resolved, particularly with queuing, then there would be an impact on the planet.

He noted that there should have been a 2/3 majority to impose a major decision and that a 52% majority was not high enough. He reminded the Councillors present of the rise of the far right after the referendum and drew parallels to Germany in the 1930's.

*The Conservative Councillors present, Jason Cummings, Jason Perry, Maria Gatland, Lynne Hale, Simon Hoar, Yvette Hopley, Vidhi Mohan and Robert Ward, left the Council Chamber at 1944 hours.*

The Cabinet Member for Children, Young People & Learning expressed frustration that we had not learnt from history of the impact a decision like this could cause; she noted being a decedent of slaves she was concerned that there were dark times ahead. There was not a clear position of the impact on the education system; however, a full report would be discussed at a future Cabinet meeting.

*Councillor Bernadette Khan entered the Council Chamber at 1946 hours.*

The Leader thanked the guest speakers, Councillor Leila Ben-Hassel and Matthew Kershaw.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

**RESOLVED: To**

1. Note the measures in place to mitigate the risks emerging from our exit from the EU including the Brexit Board, ongoing communications with partners and appointment of a Brexit lead; and
2. Note that Brexit preparations have been affected by the lack of clarity over the nature of Brexit, its scale and its timing.

73/19

**Corporate Plan Performance**

*This item was heard second, after A Sustainable Croydon Update.*

The Leader introduced and noted that the report included multiple indicators, many showing a positive direction of travel, and explained that the Council was committed to be open and transparent of the performance against challenging times with funding cuts. In the previous week there had been the launch of the Youth Zone and opening of the Fairfield Halls; two huge parts of the Cabinet's commitment were

delivered. The Corporate Plan reflected the priorities and manifesto that the administration had been elected on.

The Cabinet Member for Environment, Transport & Regeneration (Job Share, Non-Voting) noted that the statistics in Appendix 1 were inaccurate and that the target of homes to be delivered of 1645 was for all homes, and not just private homes as the report suggested. He added that the target had not been met; however, there was approximately 3000 homes to be delivered in the near future.

In response to the Shadow Cabinet Member for Finance & Resources the Cabinet Member for Finance & Resources explained that the boundary for an indicator to be marked as red in the Corporate Plan Performance report was 10%.

The Leader noted that the UASC (Unaccompanied Asylum Seeking Children) funding lobbying operation continued and he welcomed cross-party support with this, He thanked the unprecedented support from all 32 boroughs and the work of the Local MPs. Croydon was approximately £10m underfunded per year, which was not a sustainable position, so it was crucial to continue publically calling on the Government to resolve this.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

**RESOLVED:** To note the progress made against the Corporate Plan priorities as set out in the report and appendix.

74/19

### **Make a Stand**

*Councillor Louisa Woodley exited the Council Chamber at 1949 hours.*

*Councillor Leila Ben-Hassel exited the Council Chamber at 1951 hours.*

The Cabinet Member for Safer Croydon & Communities introduced the report which provided a summary of the Chartered Institute of Housing's "Make a Stand" pledge and the four commitments were; to put in place and embed a policy to support council residents who were affected by domestic abuse, to make information about national and local domestic abuse support services available on the Council's website and in other appropriate places so that they were easily accessible for residents and staff, to put in place a HR policy, or amend an existing policy, to support members of staff who may be experiencing domestic abuse, and to appoint a champion at a senior level in the organisation to own the activity the Council was undertaking to support people experiencing domestic abuse.

It was noted that raising awareness was important; campaigns were run across the Borough and advertising spaces were being utilised. A key area of work was the introduction of the DRIVE project, which looked to find long term solutions to domestic abuse, reduce the number of victims and challenge perpetrators to stop; Croydon was the only site in London to pilot this project for the Mayor of London.

Victoria Atkins MP, Minister for Safeguarding & Vulnerability and Minister for Women, visited the FJC (Family Justice Centre) earlier in the week to find out about the impact the project might have. It was too early to see any clearer findings; however, the statistics gathered by Bristol University from across the country following earlier pilots showed a reduction in violence, including physical violence, harassment and stalking.

The Cabinet Member for Homes & Gateway Services thanked Councillor Hamida Ali and the Council officers for their hard work and expressed the importance of feeling safe within a home for residents. It was important for all Council officers to work together and report any incidents witnessed within the home to ensure people could receive assistance when they need it.

The Cabinet Member for Families, Health & Social Care echoed Councillor Alison Butler's comments and thanked Councillor Hamida Ali. She noted that the figures on domestic violence released earlier in the week highlighted the importance of the work even more.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

**RESOLVED: To**

1. Sign up to the Chartered Institute of Housing's "Make A Stand" pledge on behalf of the Council to make a commitment to support people experiencing domestic abuse;
2. Note that the Council already complies with three of the elements of the pledge;
3. Appoint the Cabinet Member of Safer Croydon and Communities, to own the activity around supporting those experiencing domestic abuse to adhere to the final element of the pledge; and
4. Agree to publicise the signing of the pledge through the Council website and social media.

75/19

**Local Implementation Plan (LIP) Annual Spending Submission 2020/21**

The Acting Cabinet Member for Environment, Transport & Regeneration (Job Share) noted that Transport for London (TfL) had allocated £2.471m

funding to Croydon for 2020/21 including £2.362m for the 'Corridors, Neighbourhoods & Supporting Measures' programme. The report outlined the proposed schemes to receive funding.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

**RESOLVED: To**

1. Approve the Croydon Annual Spending Submission to TfL to release 2020/21 Local Implementation Plan (LIP) funding including the following individual schemes:
  - 1.1 Parking management reviews (£100,000).
  - 1.2 Kenley Healthy Streets project (£52,000)
  - 1.3 Suburban bus accessibility project (£30,000)
  - 1.4 Traffic reduction strategy (£30,000)
  - 1.5 Public realm accessibility improvements (£40,000)
  - 1.6 Public Rights of Way improvements (£30,000)
  - 1.7 Parks and green spaces accessibility (£30,000)
  - 1.8 Pedestrian priority improvement schemes (£200,000)
  - 1.9 Cycle hire scheme development (£20,000)
  - 1.10 Cycle route delivery (500,000)
  - 1.11 Car Club development (£30,000)
  - 1.12 E-mobility and EV charging points (£40,000)
  - 1.13 Cycle training and bikeability (£130,000)
  - 1.14 Healthy Workforce (£15,000)
  - 1.15 Promoting walking and cycling (£40,000)
  - 1.16 Play Streets (£10,000)
  - 1.17 Healthy School Neighbourhoods (£300,000)
  - 1.18 School Travel Plans implementation (£130,000)
  - 1.19 Vision Zero – Safer District Centres & 20mph zones (£200,000)
  - 1.20 Vision Zero – Local Safety Schemes (£125,000)
  - 1.21 Vision Zero – Safer Speeds (£150,000)
  - 1.22 Vision Zero – Safer Behaviours (£150,000)
  - 1.23 Vision Zero – Research and evidence (£10,000)
2. Note that the following schemes will require further requests or bids to be submitted to TfL to release of additional funding in 2020/21. The available funding amounts won't be known until after September 2019 and these submissions will be dealt with under the proposed delegation to the Executive Director of Place:
  - 2.1 South London Construction Consolidation Centre - Mayor's Air Quality Fund (£TBC)
  - 2.2 Reconnecting Old Town - Liveable Neighbourhood Programme (£TBC)
  - 2.3 'Principal Road Renewal' funding totalling (£TBC);
  - 2.4 'Bridge Assessment and Strengthening' funding proposals



- totalling (£TBC)
- 2.5 Low Emission Neighbourhood (£TBC)
- 2.6 Bus Priority Portfolio Delivery (£TBC)

3. Delegate authority to the Executive Director of Place in consultation with the Acting Cabinet Member for Transport, Regeneration and Environment (Job Share) to make any further amendments to the Annual Spending Submission 2020/21, including submission of the additional bids or requests for funding mentioned at 2.1 to 2.6 above.

76/19

### **Education Estates Strategy Update**

The Cabinet Member for Children, Young People & Learning introduced the report and explained to Members that it was an update paper following the main report previously agreed by Cabinet on 21 January 2019. The majority of the recommendations were for noting; however, the proposed three year school place supply strategy and the Special Educational Needs and Disability (SEND) supply strategy were seeking approval from Cabinet.

It was noted that the future indication for school places showed sufficient in primary and secondary school places; there was a 5% drop in the birth rate in 2013, which had resulted in a falling school roll. There was a high number of children in the top levels within primary education, due to an increase in birth rate previously, who would be moving through to secondary school in the next few years. It was explained that despite this there was no current plans to create additional mainstream school places.

It was explained to Cabinet that there were new schools being opened: Arc Blake Academy, opening in September 2021; St. Nicholas School, the new SEND school specialising in those diagnosed with autism, would be opening in September 2020; and the free school Addington Valley Academy was expected to be opened in 2020.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

#### **RESOLVED: To**

##### **School Place Planning**

1. Note the update of mainstream school pupil projections undertaken and submitted to the Department for Education (DfE) in July 2019 – available places vs school capacity (SCAP) 2019 forecasts – at appendix 1 of the report.
2. Note the temporary expansion of Smitham Primary by one form of entry from September 2019.
3. Approve the proposed three year school place supply strategy –

paras. 3.24-3.26 and appendix 6 of the report.

4. Note delegated decision (ref no. 0619LR) taken by the Executive Director of Children, Families and Education, in consultation with the Cabinet Member for Children Young People and Learning to close St Andrew's CofE High School from August 2020 – at appendices 2 and 3 of the report.

5. Alternative Provision / Pupil Referral Unit (PRU)

- 5.1 Note the decision of East Surrey College not to enter into a lease with Croydon Council for the land adjacent to the Cotelands site.

- 5.2 Note that refurbishment of the existing Cotelands PRU building at John Ruskin College has been completed.

Special Educational Needs and Disability

6. Note and agree the updated Special Educational Needs and Disability (SEND) supply strategy (Table 1 of the report) for the next 3 academic years – 2019/20 to 2021/22. The SEND School Place Plan is informed by the Council's Dedicated Schools Grant Recovery Plan and 0-25 SEND Strategy.
7. Note that the ESFA commissioned Croydon to lead on the delivery of the new special free school - Addington Valley Academy (Timebridge site) which is proposed to be fully funded by the ESFA at a budget of £13.509m.
8. Note the update on the partnership with Croydon Further Education (FE) college to establish new local post 16 places in an SEN Centre of Excellence.
9. Note the continued planned expansion of secondary autism Enhanced Learning provision at Oasis Arena.
10. Note the proposed feasibility option regarding Red Gates; St Giles and Priory Special Schools.

**School Admissions**

- 11 Note the number of children and young people who received their first or top three preference school.

**Capital Programme**

- 12 Note the updated Education Capital Programme spend – at appendix 4 of the report.

**School Maintenance and Compliance**

- 13 Note the updated on the Schools' Maintenance Plan for 2019/20 that was agreed in January 2019 - Appendix 5 and delegate

authority to the Executive Director, Children, Families and Education to vary the plan to reflect actual prices and new urgent issues that may arise, including authorising spend against the allowance for emergency and reactive works. The Executive Director, Children, Families and Education shall report back to members in respect of any exercise of such authority.

14 Note update on fire safety works in Croydon community schools.

77/19

### **Quarter 1 Financial Performance 2019/20**

The Cabinet Member for Finance & Resources introduced the report and thanked council officers for their hard work managing the expenditure.

There was a continued growth in demand and a set of initiatives were being taken for prevention and early help, some of which were referenced in report, to help families, residents and reduce their need. Despite this, the report showed a balanced forecast for the council this financial year.

*Councillor Woodley entered the Council Chamber at 2002 hours.*

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

#### **RESOLVED: To**

1. Note the current revenue outturn forecast at the end of the first quarter of 2019/20 of **£0.025m**, this is before exceptional items of **£9.415m**, resulting in a total overspend of **£9.440m**;
2. Note that the exceptional items of £9.4m relate to costs incurred by Croydon Council for Unaccompanied Asylum Seeking Children (UASC) and No Recourse To Public Funds (NRPF), due to insufficient funding from the Home Office;
3. Note the ongoing engagement with and lobbying of Government by the Council for additional funding for Croydon, both in general terms and specifically Unaccompanied Asylum Seeking Children given Croydon's gateway status;
4. Note the HRA position of a **£0.213m** forecast underspend against budget;
5. Note the capital outturn projection of **£341.3m**, forecast to be an underspend of **£95.4m** against budget;
6. Agree that an additional four new pipeline sites are disposed of to Brick by Brick Croydon Ltd, as detailed in paragraph 7.8 of the report; and

7. Note the recommendation to Full Council to increase the Capital Programme, this includes an additional £100m for asset investment.

**RESOLVED:** To recommend to Council

1. The approval to increase to the capital programme by **£112.816m** as set out in Table 6 of the report; and
2. The approval of an increase to the Operational Boundary for borrowing, and Authorised Borrowing Limit of **£219.296m** set out in Table 7 of the report.

78/19

### **Stage 1: Recommendations arising from Scrutiny**

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

**RESOLVED:** To receive the recommendations arising from the Children & Young People Sub-Committee (18 June 2019) and Scrutiny & Overview Committee (16 July 2019) and to provide a substantive response within two months (i.e. at the next available Cabinet meeting on **21 October 2019**).

79/19

### **Investing in our Borough**

Councillor Hall noted that the final phase of the Colonnades Leisure and Retail Park had been completed.

The Leader of the Council delegated authority to the Cabinet to make the following decisions:

**RESOLVED:** To note

1. The list of delegated award decisions made by the Director of Commissioning and Procurement, between 12/06/2019 – 15/08/2019;
2. The list of delegated award decisions for contracts over £500,000 in value and procurement strategies over £5,000,000 in value made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet; and
3. Property acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.

80/19

**Exclusion of the Press and Public**

This was not required.

The meeting ended at 8.07 pm

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<b>REPORT TO:</b>	<b>CABINET 21<sup>st</sup> October 2019</b>
<b>SUBJECT:</b>	<b>A Sustainable Croydon Update - Citizen's Assembly</b>
<b>LEAD OFFICER:</b>	<b>Shifa Mustafa, Executive Director of Place Gavin Handford, Director of Policy &amp; Partnerships</b>
<b>CABINET MEMBER:</b>	<b>Cllr Tony Newman, Leader of the Council All Cabinet Members</b>
<b>WARDS:</b>	<b>All</b>
<p><b>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</b></p> <p><i>The recommendations contained in this report aims to deliver against multiple priorities outlined in the Corporate Plan including but not limited to:</i></p> <ul style="list-style-type: none"> <li>• <i>Improved air quality, especially at or near schools</i></li> <li>• <i>To increase resident engagement to</i></li> <li>• <i>Transport, digital and social infrastructures are effective and support economic growth</i></li> <li>• <i>Less reliance on cars, more willingness to use public transport, walk and cycle</i></li> </ul> <p><a href="#">Corporate Plan for Croydon 2018-2022</a></p>	

<p><b>FINANCIAL IMPACT</b></p> <p>The Citizen's Assembly and all costs associated will be funded from within existing revenue budgets.</p>
<p><b>FORWARD PLAN KEY DECISION REFERENCE NO.: 0619PL</b></p> <p>The Key Decision is to be delegated to the Executive Director of Place.</p>

<p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below</p> <p><b>1. RECOMMENDATIONS</b></p> <p>The Cabinet is recommended to</p> <p>1.1 Note the methodology of a Citizen's Assembly to draft recommendations to Cabinet and evidence for the commission using residents input.</p> <p>1.2 Approve the delegation of authority to the Executive Director of Place in consultation with the Cabinet Member for Finance &amp; Resources for final approval of the Citizen's Assembly methodology.</p> <p>1.3 Note the information about the Sustainable Croydon Commission proposal for a November report.</p>
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## **2. EXECUTIVE SUMMARY**

- 2.1 This report is an update from the Sustainable Croydon Update taken to Cabinet in September. That information only report provided a summary of the Sustainable Croydon Summit 2019 on the 27<sup>th</sup> June where the Leader announced the intention to take a declaration of Climate and Ecological Emergency to Council. This was unanimously ratified by Full Council on the 15<sup>th</sup> July.
- 2.2 The proposal for the Citizen's Assembly mentioned in the next steps of the September report is detailed in this report for the approval of Cabinet.

## **3. CLIMATE EMERGENCY**

- 3.1 At the start of the Croydon Sustainable Summit, which was opened by Shirley Rodrigues – Deputy Mayor for Environment and Energy for London – Councillor Tony Newman, Leader of the Council, declared a climate emergency. This was recognition from the Council that the damage to the world's climate had reached a state of crisis requiring urgent, significant action. We are at a critical point in time, where immediate change is necessary at an international, national and local level to ensure the best possible future for our community.
- 3.2 This emergency does not merely severely impact upon the environment but our health, with many individuals hospitalised by the poor air quality resulting from pollution. A radical agenda is therefore needed to create a sustainable borough to protect the people of Croydon. This agenda must be led by young people so that the needs of future generations are embedded into the borough's plans, but all of us have a responsibility.
- 3.3 In recognition of the need for ambitious and effective change the Leader made the commitment to make Croydon Council carbon neutral by 2030 to ensure we take personal responsibility and react appropriately to this severe global issue. Further, the Leader also announced Croydon's ambition to become the leading sustainable green place in London to ensure we are doing all we can at a local level to do our part.
- 3.4 In the weeks after the Summit, Cabinet considered a report which was referred to Full Council and led to the official declaration of a Climate and Ecological Emergency by the Council on July 15<sup>th</sup>. The report also committed to empowering businesses and residents to play their part in making Croydon the most sustainable borough in London.
- 3.5 Already, action has been taken to make Croydon a greener, more sustainable place:
- The Green Croydon Fund of £250k was announced at the summit - this annual fund provides funding support for projects, activities and initiatives that promote environmental protection, green living and a sustainable lifestyle in Croydon and link into the priorities identified in the Council's Corporate Plan. The fund launched on the 1<sup>st</sup> October 2019.



- An increase in the recycling rate borough-wide by 9%;
- A published five-year Air Quality Action Plan 2017 – 22;
- More than 1,500 new bin installations all across the borough to revamp the system for waste collection;
- The School Street Scheme which prohibits most vehicular transport at the start and end of the school day to improve air quality around schools in the scheme and protect children from the harms of air pollution;
- The award-winning “Don’t Mess with Croydon” campaign
- A commitment to planting at least 3,500 trees between 2018 – 2023;

3.6 However, more must be done to ensure that the Council fulfils its commitment to becoming carbon neutral by 2030 and for Croydon to become a sustainable city. This will also tie into the Mayor of London’s commitment for London to become carbon neutral by 2050.

#### **4. CITIZEN’S ASSEMBLY**

4.1 This report is proposing the launch of a Citizen’s Assembly this autumn, of which the first theme discussed will be targeting Climate Change.

4.2 A citizens' assembly is a group of people who are brought together to discuss an issue or issues and reach a conclusion about what they think should happen. Using this method would ensure that the actions the Council takes in regards to climate change would be heavily influenced by the voice of residents.

4.3 Multiple Councils have undertaken Citizen’s Assemblies after declaring climate emergencies to great success including Camden Council.

##### **Recruiting Assembly Members**

4.4 The Council will be working with an independent consultant to deliver this Citizen’s Assembly to ensure that the recommendations that result from the assembly will be independent and based solely on resident input.

4.5 In order for an assembly to come to a borough-wide consensus of opinion, members of the community will be recruited and entered into a pool where 70 residents will then be selected by the various aspects of Croydon across wards, and across groups that share protected characteristics to ensure they are representative of our borough’s diverse communities. The aim is to retain as many assembly members for all three sessions; only an average of 50 are expected to attend from the 70 invited.

4.6 Assembly members will be provided with £50 worth of vouchers from a selected retailer for each session they attend to encourage those selected to participate in all three of the meetings that are currently being planned. Members will need to attend all three sessions to receive the vouchers.

## **Assembly Meeting Management and Results**

- 4.7 Once participants have been recruited to take part in the Citizen's Assembly process, they will be provided with pre-meeting briefings before each meeting to ensure that they are clear about what to expect before each session. This should also allow each member to take an active approach over the course of the assembly.
- 4.8 The content of the meetings will be co-designed by the independent consultant with the Council to ensure that the assembly members are:
- Informed of any relevant background information regarding climate change and lowering carbon emissions in Croydon and London for context;
  - Given the opportunity to scope the issue of climate change in Croydon in the first session;
  - Able to take evidence and explore options around what can be done in Croydon to lower our carbon emissions across the borough as well as as a Council;
  - Able to form a conclusion based on the scoping they have done and the evidence they have seen to produce a set of recommendations to be taken to Cabinet for the review of Council Members.
- 4.9 The meetings will be scheduled to take place over a 2.5hr slot during either evenings or Saturdays around the borough depending on the availability of assembly members to ensure most are able to attend.
- 4.10 The independent consultant will design deliberative activities to produce focussed outputs and summary reports after each event.
- 4.11 A final report will be produced after the last session which will include details of the whole process as well as summary outputs and a set of recommendations from the assembly members.

## **5. SUSTAINABLE CROYDON COMMISSION**

- 5.1 The Council is working with the New Economics Foundation to draft a terms of reference for a Sustainable Croydon Commission to be brought to November Cabinet for approval.
- 5.2 This commission is to identify long term goals in order to dramatically reduce the Council's carbon emissions as well as recommend realistic actions in order for Croydon as a borough to become a sustainable city.
- 5.3 As has been said from the beginning with the Sustainable Croydon Summit, the Council intends to work closely with residents, including young people, and businesses to become more sustainable. To this end, the New Economics Foundation is currently consulting with stakeholders around the borough to form the proposal for a commission independent from the Council.
- 5.4 More information will be provided in the November report.

## **6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 6.1 The costs associated with the Citizen's Assembly will be funded from within existing revenue budgets.
- 6.2 The allocation of funding and the outcomes of the Citizen's Assembly will be monitored regularly.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk (s151 Officer)

## **7. LEGAL CONSIDERATIONS**

- 7.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the report recommendations raise no specific legal implications requiring comment. The recommendations identify further work to be carried out and as this progresses it is likely that legal issues will need to be considered in more detail and the Legal Team will assist with this as required.

Approved by: Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Monitoring Officer.

## **8. HUMAN RESOURCES IMPACT**

- 8.1 There are no immediate HR implications arising for the recommendation but further assessments will be undertaken over the course of the assembly.

Approved by: Sue Moorman, Director of Human Resources

## **9. EQUALITIES IMPACT**

- 9.1 The Citizen's Assembly members will be recruited to form a representative sample of Croydon's diverse population to ensure we take on board the views of and hear the voices of all our residents.

Approved by: Yvonne Okiyo, Equalities Manager

## **10. ENVIRONMENTAL IMPACT**

- 10.1 There will be no direct environmental impacts from the Citizen's Assembly however, the meetings will encourage residents to think and act on ways to become more sustainable and lower their carbon footprint.
- 10.2 The recommendations that come out of the assembly and the actions taken as a result will lower our carbon emissions as a Council and a borough with direct input from Croydon residents.

10.3 This project should ensure that the Council identifies what is necessary to achieve Croydon's aim to be carbon neutral by 2030 and London's commitment of 2050 with resident input.

## **11. CRIME AND DISORDER REDUCTION IMPACT**

11.1 No expected impact.

## **12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

12.1 The assembly has been recommended as a course of action to immediately affect climate change with resident input.

## **13. OPTIONS CONSIDERED AND REJECTED**

13.1 No other options beyond the Sustainable Croydon Commission have been considered at this stage.

## **14. DATA PROTECTION IMPLICATIONS**

14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**YES**

The Citizen's Assembly recruitment process will require personal details for each assembly member including but not limited to:

- Name
- Address
- Date of birth
- Ethnicity
- Email address
- Contact number

14.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**YES**

All personal information that will be captured, transferred and stored over the course of the Citizen's Assembly by both the independent consultant and Croydon will be kept in line with GDPR requirements. Participants will be informed of this at the recruitment stage.

Approved by: Gavin Handford, Director of Policy and Partnerships

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**CONTACT OFFICER:**

Yasmin Ahmed, Senior Strategy Officer  
Yasmin.Ahmed1@croydon.gov.uk  
Ext 62545

**APPENDICES TO THIS REPORT:**

None

**BACKGROUND DOCUMENTS:**

None

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**For General Release**

<b>REPORT TO:</b>	<b>CABINET 21<sup>st</sup> October 2019</b>
<b>SUBJECT:</b>	<b>Don't Mess With Croydon Campaign Update</b>
<b>LEAD OFFICER:</b>	<b>Shifa Mustafa Executive Director Place Steve Iles Director Place</b>
<b>CABINET MEMBER:</b>	<b>Councillor Stuart Collins Deputy Leader and Cabinet Member for Clean Green Croydon</b>
<b>WARDS:</b>	<b>All</b>

**CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON**

These services meet the Council's Corporate priorities to:  
 Provide value for money to its residents through the development of an integrated waste and street cleansing service alongside three neighboring authorities, achieving considerable savings and also improvements in contract performance  
 Support improved use of Council assets and investment in energy and carbon management.  
 Contribute to the local economy and environment through social value.

**FINANCIAL IMPACT**

There are no direct financial implications arising from this report.

**FORWARD PLAN KEY DECISION REFERENCE NO.: Not a key decision.**

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

**1. RECOMMENDATIONS**

The Cabinet is recommended to:

- 1.1 Note the positive impact of the new Recycling and Waste Service on Croydon's Recycling Rate.
- 1.2 Agree the approach to a communication plan (including the circulation of a recycling video to schools) described in this report.

## **2. EXECUTIVE SUMMARY**

- 2.1 In September 2018 Croydon embarked on an ambitious new journey to improve the recycling rate in the borough. This involved a major service change which increased the amount of capacity residents have available for recycling whilst decreasing the capacity for residual waste. The impact of this is an increase the household recycling rate from 38% before the new service to 48% currently.
- 2.2 This paper provides an update on the Waste and Recycling service one year on from the implementation of this service change, the successes and achievements so far and future plans for increasing the recycling rate to 50% by 2020.
- 2.3 The council is committed to reaching a 50% recycling rate by 2020 and reducing residual waste. The Council is further committed to working with residents and contractors create behavioral change and instill pride in local communities.

## **3. DETAIL**

### **3.1 Background Information**

#### **South London Waste Partnership Contract**

- 3.1.1 The South London Waste Partnership (SLWP) was formed in 2003 between the boroughs of Croydon, Kingston, Merton, and Sutton. SLWP has a proven record of providing improved and more cost-effective waste management services through the procurement of waste disposal, recycling and Household Reuse and Recycling Centre contracts.
- 3.1.2 Veolia were the successful bidder for a new waste and recycling contract, and a new service commenced on the 1<sup>st</sup> April 2018 for street cleansing, and the 1<sup>st</sup> October 2018 for the waste and recycling collection service. The South London Waste Partnership (SLWP) contract has harmonised the waste collection services across the boroughs of Croydon, Kingston, Merton and Sutton. This provides residents with a consistent message throughout the boroughs.

### **3.2 2018 Service Change**

- 3.2.1 In 2018 Croydon embarked on an ambitious change to the waste and recycling service. The start of a new waste and recycling contract allowed Croydon to review the recycling and waste service it provided to residents.
- 3.2.2 From both a financial and environmental perspective recycling is preferable to disposal of residual waste. Environmentally, recycling helps conserve the finite resources associated with making new products and reduces dependency on virgin materials. Financially it costs considerably less to recycle waste than it does to dispose of it as residual waste.



- 3.2.3 Recognising the previous waste collection system Croydon provided disproportionately more capacity for residual waste, which made up approximately 60% of the total waste capacity. A decision was made to increase the container capacity for households to recycle more whilst simultaneously reducing the capacity for residual waste.
- 3.2.4 The changes to the provisions were as follows:
- 240L refuse bin – replaced by a 180L bin
  - 55L paper and card recycling box – replaced by a 240L bin
  - 55L dry mixed recycling box – replaced by a 240L bin (this was the existing landfill bin)
  - Food bins/caddies – remained the same.
- 3.2.5 Providing residents with larger wheeled bins for recycling, whilst at the same time reducing the size of the residual waste bins encourages recycling and gives residents the incentive to reduce the amount of landfill waste they create, particularly as side waste (residual waste that is not contained within the wheeled bin) will not be taken.
- 3.2.6 The new service also resulted in a change to collection days for 78% of residents. The changes allowed rounds to be reorganised in order to make them more efficient and ensure there was a concentration of resources in the same area on any given day helping to minimise the effect of breakdowns and improve service resilience.
- 3.2.7 The change in containers and collection days were a big undertaking for the small council team responsible for delivering the new service to the residents. There was extensive planning before the service change involving communications planning, councillor updates, working in partnership with Veolia and other suppliers. The waste and recycling team also worked across internal departments to ensure other teams that would be impacted (MyAccount, CRM, Contact Centre, Access Croydon) were aware of the changes, when they were starting and how to assist residents in queries relating to the new service.
- 3.2.8 It was always anticipated there would be considerable disruption to the service both during the change and the bedding in period immediately after. This resulted in high volumes of calls, emails and letters and additional resources were brought in to deal with this increase. Additionally, the Council's waste contractor, Veolia provided additional staff and worked overtime hours to ensure the new rounds were completed on their scheduled days. This hard work ensured disruption was kept to a minimum for our residents. The team involved in rolling out the service received a Special Recognition award at the Croydon Awards in 2018.
- 3.2.9 Figures show that residents have embraced the new service with recycling rates improving from 38% before the roll out to 48% currently. Less residual waste was presented per household and the amount of recycling significantly improved. This is particularly impressive given the population growth that the borough has experienced, and the Council has put on record its thanks to residents for their efforts to recycle more and their patience whilst the service was in its infancy. The increased recycling rate in 2018/19 puts Croydon on track to meet the target of 50% recycling by 2020.

3.1.10 To build on this success and keep momentum going the council has a comprehensive education and engagement campaign plan to work with residents to increase recycling rates further.

#### **4 CELEBRATING SUCCESS**

4.1 One year on, Croydon is marking the success already achieved and has undertaken a range of recycling activities for National Recycle Week (23-29 September 2019). This marked the success of the roll out and looked toward improving the recycling rate even further.

4.2 For National Recycle Week the South London Waste Partnership (SLWP) has undertaken advertising on the local tram network with promotional adverts to encourage residents to recycle and move away from single use plastics.

4.3 A new educational video has been commissioned which follows the journey of different waste streams. The full video is now available on the SLWP website, and shortened sections demonstrating the journey from doorstep to recycled product, of particular waste streams will be promoted using a paid for social media campaign.

4.4 Members of the Veolia Education and Outreach team will also be visiting a Croydon school to mark National Recycle Week.

#### Achieving the 50% Target: - Communication Plan

4.5 In order to achieve the 50% recycling rate Croydon has an engagement plans to support this aim.

4.6 The SLWP contract has resulted in cost avoidance by reducing the amount of waste sent for disposal. Part of these savings have been reinvested back into the service to help it achieve the ambitious targets. This was modelled in the business case for the new bins. The reinvestment has been into staffing and there will be new recycling officers that have planned schemes of work focusing on education, contamination reduction, flats performance improvement, resident engagement, increasing participation and working with resident associations and other stakeholders – all areas where further progress could deliver a considerable reduction in residual waste and increase in recycling.

4.7 The waste and recycling team have been undertaking visits with the cabinet member to troubleshoot challenging properties and locations where recycling and waste management can be difficult for the residents/tenants or managing agents.

## 5 SCHOOL ENGAGEMENT

- 5.1 School educational talks play a significant part in achieving the target of 50%. Croydon has one of the largest populations of young people in London and we recognise that shaping their views at an early age will ensure that a sense of pride in their local environment will stay with them for life. There are also further benefits, as the messages these children hear at school often form the basis for home work activities, creating further discussions at home with the message being passed on to parents, brothers, sisters and family friends.
- 5.2 To this effect there has been a rolling programme of educational talks to Croydon's schools. Since the service change there have been 18 assemblies where the team spoke to 7,347 pupils. The team will continue to engage with schools and provide waste and recycling talks.
- 5.3 There are plans to increase participation of the food waste recycling service. The recycling team are working to improve capture rates by removing barriers to participation on the service, the main barriers are people being unaware of the service and unsure of how to use it. To overcome this the team will be improving education around the service and trialing a range of interventions to drive up service performance.
- 5.4 Croydon has an increasing number of flats and this is part of the service where considerable improvement can be achieved. Focusing on reducing barriers to recycling within these locations can potentially achieve significant changes in behavior creating improved recycling habits and reduced levels of contamination.
- 5.5 The Council are also working on an internal recycling plan which will feed into the Mayor's strategy for London. To increase awareness, a Recycling Forum will be set up to allow staff to take ownership of the recycling and waste initiatives that happen internally. The Recycling Team are working with facilities management to give increased opportunities for recycling in the workplace and increased awareness among staff.

### Journey of Waste

- 5.6 As previously mentioned, the SLWP have created an educational video that show the journey of waste. This is to give residents a better understanding of what happens to the waste once it has been put in the bin and follows it from collection to disposal.
- 5.7 The video is being promoted during National Recycle Week through paid for ads on social media. These featured a trailer for the video and drive traffic to the site and views of the video, and should appeal to audiences who are less receptive to more traditional communications such as service leaflets. It is an innovative campaign that informs and engages residents and will encourage more recycling and raise awareness.
- 5.8 It is proposed that the new videos are promoted to schools and used in educational activities as part of assemblies and educational activities. This will help pupils to visualise what happens to their waste after it is collected, and appreciate the impact they have by recycling more.

## Climate Emergency

- 5.9 Since the new service launch Croydon have declared a climate emergency. The Council are using a raft of measures to deal with this and reducing waste and increasing recycling is high on the priorities.
- 5.10 Single use plastic is one of the most prevalent forms of waste and litter, and is the focus of increasing public concern, the Council has confirmed they have secured funding for three water fountains to be installed in the borough. This will assist residents in cutting down on the use of single use water bottles and encourage reusable bottles.
- 5.11 The Council are also in agreement with the aims of grass roots organisations within Croydon that are focusing on reducing single use plastic. There is already a plastic free shop in the borough with another planned.
- 5.12 Croydon aims to achieve a 50% recycling rate by 2020 and be London's Greenest Borough. We are on track to deliver this and the Waste and Recycling Plan detailed above will allow Croydon and its residents to achieve this ambitious target.

## **6. CONSULTATION**

- 6.1 This report is a good news story and therefore has not been consulted upon.

## **7. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 7.1 The effect of the decision  
There are direct financial implications arising from this report. The investment detailed in this report has already been factored into the capital programme.
- 7.2 Risks  
None arising from this report.
- 7.3 Future savings/efficiencies  
The capital investment and the impact from the increased recycling rate has created savings and enabled the services to be delivered more efficiently and effectively.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk S151  
Officer

## **8. LEGAL CONSIDERATIONS**

- 8.1 There are no additional legal considerations directly arising from this report.

Approved by Sean Murphy, Director of Law and Governance.

## **9. HUMAN RESOURCES IMPACT**

- 9.1 There are no direct Human Resources implications arising from the recommendations

Approved by Sue Moorman, Director of Human Resources

## **10. EQUALITIES IMPACT**

- 10.1 An equalities impact assessment was carried out for the SLWP. This identified there was no negative impact on any of the protected characteristics.
- 10.2 Due to the SLWP key findings being 'No major change - the Equality Analysis demonstrates that the policy is robust and that the evidence shows no potential for discrimination and that all opportunities to advance equality have been taken' a decision was made to not undertake a further equalities analysis.

Approved by: Yvonne Okiyo, Equalities Manager

## **11. ENVIRONMENTAL IMPACT**

- 11.1 The main environmental impacts on this report should be a further increase in the recycling rate. This will be a positive environmental outcome as the waste will be treated as recycling instead of residual waste.

## **12. CRIME AND DISORDER REDUCTION IMPACT**

- 12.1 There are no implications of the proposal for the reduction/prevention of crime and disorder.

## **13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 13.1 The recommendations are to support the future plans for promoting waste and recycling to see a further increase in recycling rates in Croydon.

## **14. OPTIONS CONSIDERED AND REJECTED**

- 14.1 None

**15. DATA PROTECTION IMPLICATIONS**

**15.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

**15.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

NO

The Director of Public Realm comments that there are no data protection implications from this report.

Approved by: Steve Iles Director of Public Realm

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**CONTACT OFFICER:** Tom Lawrence Head of Environmental Service

**APPENDICES TO THIS REPORT:** None

**BACKGROUND PAPERS:** None

## For General Release

<b>REPORT TO:</b>	<b>Cabinet 21<sup>st</sup> October 2019</b>
<b>SUBJECT:</b>	<b>Croydon Public Safety CCTV Upgrade</b>
<b>LEAD OFFICER:</b>	<b>Sarah Hayward, Director of Violence Reduction</b>
<b>CABINET MEMBER:</b>	<b>Cllr Hamida Ali, Communities, Safety and Justice</b>
<b>WARDS:</b>	<b>Borough wide</b>
<p><b>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</b></p> <p>In June 2017 Cabinet adopted the 2017-2020 Safer Croydon Strategy for Croydon. The strategy specified five key priorities that the Safer Croydon Partnership intends to achieve. These priorities include the aim to improve public confidence and community engagement and tackle crime and antisocial behaviour. The upgrade of the Public Safety CCTV network will be an asset in the delivery of these priorities. The successful delivery of this priority is important not only for the wellbeing of the people that live, work and visit Croydon but it clearly links to the Borough’s Growth Strategy and the need to make Croydon an attractive place for businesses to invest in and people to come and live.</p> <p>The 2018 – 2022 Council Corporate Plan includes a specific action to “<i>Upgrade our CCTV infrastructure and ensure the control room is operating effectively to reduce crime and protect the public</i>” under the priority “<i>Everyone feels safe in their street, their neighbourhood, and their home</i>”.</p>	
<p><b>FINANCIAL IMPACT</b></p> <p>Cabinet approved £1M Capital funding (in Feb 2018) to match an equivalent amount from Growth Zone funding (see 1.1 below), for this infrastructure upgrade programme to procure and install the hardware and software necessary to upgrade the Public Safety CCTV system. The revenue for the maintenance contract comes from the existing CCTV budget.</p> <p>The £1m growth zone funding will be profiled in the Growth Zone Plan to be utilised in 2020/2021. This will be used with existing capital funding to procure the necessary equipment for the infrastructure upgrade including for example Columns, Cameras, Sensors and High speed Wi-Fi routers.</p>	
<p><b>FORWARD PLAN KEY DECISION REFERENCE NO.: 2319CAB</b></p> <p>This is a Key Decision as defined in the council’s constitution. The decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee by the requisite number of councillors.</p>	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

## **1. RECOMMENDATIONS**

- 1.1 To approve Growth Zone funding of £1M in 2020-21 for this CCTV Upgrade project.
- 1.2 To note change in infrastructure to enable system upgrade for growth, capability and capacity to capture future requirements in urban spaces in line with council requirements.
- 1.3 To note consultation comments: A Public Consultation in accordance with the statutory requirements was undertaken following on from a public consultation exercise from 24th June to 4th August 2019. To upgrade the infrastructure the Council has reviewed recent crime patterns and feedback from the public consultation. The evidence base will inform the methodology for siting of new and replacement cameras to ensure they are placed where they are need to meet these objectives

## **2. EXECUTIVE SUMMARY**

- 2.1 On 26 February 2018 Cabinet approved £1M from the Capital Programme 2018-19 to part-fund the modernisation of the current Closed Circuit Television (CCTV) network and replace the current analogue system with a new digital network, with the understanding that a Growth Zone allocation would provide the remaining funds to ensure a CCTV network that has capability & capacity to enable, support and manage growth in our urban places & traffic and manage their impacts on community safety This is the first time that the council has upgraded its entire public CCTV network since the 1990s and is aligned with the aims of the Council Corporate Plan and Safer Croydon Strategy.
- 2.2 The new network will use digital technology to increase capability, provide better quality images and allow the control centre to explore opportunities to provide new smart city services, such as air quality sensors to monitor pollution levels. This will require the replacement and installation of new cameras, poles, sensors and the supporting hardware to enable the system to move from a largely analogue system to a completely digital solution.
- 2.3 To deliver the upgraded network an additional £1m is required from the Growth Zone fund, as a significant part of the network will continue to focus around Croydon Town centre area. This initiative supports the Borough's Growth Strategy and the need to make Croydon an attractive place for businesses to invest in and people to come and live. The £1m Growth Zone funding has been earmarked within the latest Growth Zone Master Document



to be utilised in the 2020/2021 financial year.

- 2.4 To meet the Council's statutory requirements under the Surveillance Camera Code of Conducts a public consultation was completed to test and inform the Council's objectives for the network, public perception about upgrading the network and methodology being used to focus CCTV resources.

### **3. Croydon Public Safety CCTV Network**

- 3.1 Our CCTV control room monitors 96 fixed and 10 mobile cameras that cover the main routes and high-footfall areas across the borough, 24 hours a day, seven days a week. A map of all our cameras is available on the Council website. From April 2018 to March 2019 the service has monitored over 660 incidents and supplied evidence for 598 police investigations.
- 3.2 The service operates to the Home Office Surveillance Camera Code of Practice which sets out 12 principles for the operation of CCTV (available below) and the need to balance cameras in public places with individuals' right to privacy.
- 3.3 Our public CCTV scheme objectives can be summarised as:
- Preventing crime and anti-social behaviour and helping in the detection of criminal offences and anti-social incidents.
  - Reducing the fear of crime and anti-social behaviour.
  - Improving public protection.
  - Assisting the emergency services in the location of missing, vulnerable people.
- 3.4 These priorities support the Safer Croydon partnership's objectives to improve public confidence and community engagement and tackle crime and antisocial behaviour. The successful delivery of this priority is important not only for the wellbeing of the people that live, work and visit Croydon but it clearly links to the Borough's Growth Strategy and the need to make Croydon an attractive place for businesses to invest in and people to come and live. This activity also delivers the 2018-22 Corporate Plan action to "Upgrade our CCTV infrastructure and ensure the control room is operating effectively to reduce crime and protect the public".
- 3.5 The upgrade of the infrastructure supports these strategic aims by delivering
- Replacement of the existing obsolete analogue CCTV Cameras, with digital CCTV cameras and provision of additional CCTV cameras to cover emerging Anti-Social Behaviour and Crime Hotspots.
  - Reduction in maintenance costs of the complete Public Space CCTV system.
  - Where possible construction of a fixed wireless network to replace the existing data transmission infrastructure taking advantage of the potential

cost savings compared to conventional leased data circuits from BT.

Introduction of greater future innovation and sustainability as Smart CCTV systems can be used for much more than the traditional security and surveillance use cases that CCTV is traditionally associated with. High spec IP network cameras, open smart city platforms and data formats, as well as image processing algorithms combined with other machine learning techniques all allow the council to take full advantage of its Public Space CCTV network. These could include new smart city services in the future such as smart waste, graffiti detection as well as perimeter security services and staff less libraries that could deliver increased revenue generation, cost savings and other benefits to the Public. These will be explored through the development of the Croydon Smart city strategy.

3.6 A Public Consultation in accordance with the statutory requirements was undertaken following on from a public consultation exercise from 24th June to 4th August 2019. To upgrade the infrastructure the Council has reviewed recent crime patterns and feedback from the public consultation. The evidence base will inform the methodology for siting of new and replacement cameras to ensure they are placed where they are need to meet these objectives.

3.7 To ensure that CCTV is deployed where it is needed and will have the most effect based on the resources available to the local authority will focus on reviewing and identifying CCTV sites based on the following criteria;

- Locations with high levels of violent crime.
- Locations with high levels of acquisitive crime that is likely to be committed in the Public domain and is therefore visible to Public Safety CCTV including;
  - Drug related crime
  - Theft from the Person
  - Other Theft
  - Shop lifting
  - Bicycle theft
  - Robbery
  - Theft of and from Motor vehicles
- Crime and disorder incidents recorded by Transport for London on the bus network.
- Areas of high footfall around including Croydon town centre and major transport hubs such as East and West Croydon station.
- Areas around large Public venues such as Selhurst Park stadium and Fairfield Halls including routes to nearby transport hubs.

#### **4. Public Safety CCTV Network Upgrade – Growth Zone Funds**

4.1 To carry out the procurement of the new network infrastructure will require £1m from the Growth Zone fund, in addition to existing Capital programme

funding. This will be used to carry out a procurement exercise of up to £2m to procure and install the hardware and software necessary to upgrade the Public Safety CCTV system. The financial basis for this decision is covered in section 6 below.

- 4.2 The procurement process will be subject to Croydon's commissioning and procurement policies. The procurement strategy will be approved by the CCB but is likely to and follow the open tender process, advertised through OJEU, the eportal and industry publications.

## **5. CONSULTATION**

- 5.1 Home Office Surveillance Camera Code of Practice places a requirement on the Council to consult when implementing or upgrading its CCTV network. The code of practice sets out that proportionate consultation and engagement with the public and partners (including the police) is an important part of assessing whether there is a legitimate aim and a pressing need, and whether the system itself is a proportionate response. The consultation and engagement process also provides an opportunity to identify any concerns and modify the proposition to strike the most appropriate balance between public protection and individual privacy.
- 5.2 The Council has conducted a formal 6 week consultation for partners, businesses, residents and visitors to comment and provide feedback. The public consultation ran between 24<sup>th</sup> June and 4<sup>th</sup> August 2019. An electronic version of the survey was published on the 'Council website and the consultation was publicised via Croydon bulletins and newsletters to residents and through partners including the Voluntary and Community Sector, Town Centre Business Improvement District and Police. The Youth Engagement Team also carried out additional engagement with young people at a Community League event in New Addington event on 15<sup>th</sup> August to specifically increase the responses from young people.
- 5.3 The consultation closed with 142 respondents completing the online survey with another 10 paper copies of the surveys also returned. Please note that not all respondents answered every question so the response rate can vary from question to question. The respondents included;
- 87% (110) are Croydon residents with another 14.2% frequent visitors to Croydon (the remainder were representatives from statutory services, VCS partners and elected members).
  - The age of respondents included;
    - 10% (13) aged 24 and under
    - 32% aged between 25 and 44
    - 44% aged between 45 and 64
    - 10% aged 65 and over
  - 43% (53) of respondents identified as female while 48% (59) identified as male.

- 26% (32) identified as BAME, compared to 67% (82) respondents identified as White.
  - 6% (7) of respondents identified as LGBT compared to 75% (92) as heterosexual and 17% (21) preferred not to say.
  - 18% (23) identified as having a disability and 11% (13) preferred not to say,
- 5.4 90% of respondents who answered the question stated they were aware that Croydon Council operates a CCTV camera scheme in public areas across Croydon.
- 5.5 A significant majority of respondents agreed or strongly agreed with the objectives of the Public safety CCTV network set out in section 3.5. This ranged from 80% agreeing that CCTV reduced the fear of crime and anti-social behaviour to 88% agreeing or strongly agreeing that CCTV cameras deter crime and help in the detection of criminal offences. A large majority also agreed with the methodology being used by the Council to focus CCTV surveillance as set out in section 3.6. This ranged between 78% for large capacity venues such as Selhurst Park through to 90% of respondents who agreed or strongly agreed CCTV should be deployed at violent crime hotspots.
- 5.6 74% of respondents said that an upgraded CCTV system would make them feel safer in the day time, whilst 80% said they would feel safer at night. Only 13% of respondents felt that the CCTV network would have any negative impact on their right to privacy. Of those who answered the question, 69% stated they were confident that Croydon Council will use the public CCTV cameras in a fair and responsible way. 18% were not confident and 13% didn't know.
- 5.7 Respondents were also given the opportunity to provide comments through several open questions provided within the survey, including the perceived impacts (positive or negative) of the scheme, whether residents felt safer, the methodology being used to site the cameras, any concerns over the impact of the network on privacy and the Councils appropriate use of the system.
- 5.8 Whilst the majority of respondents did feel that CCTV could positively impact to reducing crime, 7 respondents felt that that public safety CCTV could not substitute for the presence of Police officers on the streets to enforce the law and respond to incident captured by CCTV. When asked to explain why they did not feel safer with the CCTV system present, 7 respondents also responded that this was linked for the need for a Police presence and not just cameras. Four respondents who had also not been very confident in CCTV reducing their fear of crime had responded that the cameras still provided some reassurance that the perpetrators might be caught and emergency services notified of the incident. When being asked to comment on the methodology the most common theme was from four respondents who felt that the cameras should be deployed throughout the borough and not just hotspot locations.

- 5.9 Respondents commenting on the impact on of the network on privacy were most likely to say they were not concerned about monitoring as law abiding citizens (17 respondents) or that they were prepared to accept monitoring by CCTV in public places if it was kept to the stated purposes (10 respondents). Three respondents stated they were concerned that the Council should ensure appropriate controls over the processing of the data captured by CCTV. Two respondents also expressed concerns about the potential introduction of facial recognition systems.
- 5.10 When asked what else the Council could do to address privacy concerns the two respondents suggested clear vetting and appointment processes for staff and better promotion of the positive impact of the CCTV network including the regular publication of the number of incidents it had detected
- 5.11 In response to the consultation the Council will be publishing the number of incidents detected and evidence supplied to the Police on a quarterly basis to raise awareness of the networks impact. An easy read version of the Surveillance Camera code of conduct principles will also be produced and made available on the Council website. The Council has no plans to use a facial recognition system. The current Surveillance Camera code of conduct does state that consideration for consultation would be necessary before any authority subject to the code (such as the Council), could decide to adopt such technology.
- 5.12 The Council takes its compliance duties for Public Safety CCTV very seriously and adheres to the Surveillance Camera Code of Conduct. The Council has undergone the Surveillance Camera Commissioner's third party certification to provide independent assurance that the Council's uses the Public Safety CCTV system transparently, effectively and proportionately. The Council has completed the desktop assessment stage which allows the council to use the SCC watermark. The watermark indicates that the council public safety CCTV network complies with the commissioner's code of conduct. This aims to reassure members of the public and other organisations that we are complying with the Code and use surveillance camera systems and information gathered from them in the appropriate manner. All Public Safety CCTV control room operators have also undertaken Security Industry Authority accreditation, which includes passing a criminal records check.

## 6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

### Revenue and Capital consequences of report recommendations

Current year	Medium Term Financial Strategy – 3 year forecast		
2019/20	2020/21	2021/22	2022/22
£'000	£'000	£'000	£'000

<b>Revenue Budget available</b>				
Expenditure	0	0	0	0
Income	0	0	0	0
<b>Effect of decision from report</b>				
Expenditure	0	0	0	0
Income	0	0	0	0
<b>Remaining budget</b>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<b>Capital Budget available</b>				
Expenditure	958	1,958	0	0
<b>Effect of decision from report</b>				
Expenditure	958	1,000	0	0
<b>Remaining budget</b>	<u>0</u>	<u>1,000</u>	<u>0</u>	<u>0</u>

### 6.1 The effect of the decision

The CCTV upgrade project is dependent on 2 streams of funding, the already approved Capital Programme funding and the Growth Zone funding of £1m to be approved as per recommendation 1.1 of this report. The maintenance of the current system is becoming increasingly expensive as parts fail, are no longer supported due to their age and obsolescence and cannot be easily replaced as the rest of the network is not compatible with more recent technology. Replacing the current system should reduce the cost of maintenance and network down time due to faults and the completion of repairs.

£42k of expenditure was utilised from the original £1m budget approved by cabinet (Feb 2018) on feasibility work in 2018/2019 financial year. The balance of approved capital funding of £958k has been slipped into 2019/20.

The additional £1m Growth Zone funding has been earmarked to be utilised in the 2020/2021 financial year.

### 6.2 Risks

The service is high risk as it provides 24 / 7 cover across the borough to identify, monitor and alert the Police and other services to emergency incidents occurring within the borough. The risk of current CCTV infrastructure failing is on the corporate risk register (CS0001) with a score of 16.

Should the £1m growth zone funding not be approved the upgrade of the CCTV system is unlikely to be feasible to proceed further.

### 6.3 Options

These are detailed in section 16 of this report.

#### **6.4 Future savings/efficiencies**

There are anticipated savings in the ongoing cost of maintenance for the initial period of the contract, but this may be balanced out later in the life span of the equipment and the growth in the number of cameras and poles to be maintained. There is also expected to be some savings in the renting of fibre transmission costs from BT as the network makes use of high speed Wi-Fi. These savings however will be reinvested into the service to improve CCTV coverage across the borough, which may for example include increased 4G Wi-Fi costs for cameras where there is no accessible fibre infrastructure.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk (S151 Officer)

### **7. LEGAL CONSIDERATIONS**

7.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance Solicitor to the Council comments that under section 29 of the Protection of Freedoms Act 2012 (POFA), the Council has a statutory duty to comply with a code of practice containing guidance about surveillance camera systems. The Council needs to ensure that the upgrade and operation of the public CCTV network is carried out in a responsible, consistent, appropriate and proportionate manner and comply with the consultation requirements set out within the body of the report.

7.2 Any procurement process must comply with the Council's Tenders and Contracts Regulations within part 4I of the Constitution.

Approved by: Sandra Herbert Head of Litigation and Corporate Law for and on behalf of Sean Murphy, Director of Law and Deputy Monitoring Officer

### **8. HUMAN RESOURCES IMPACT**

8.1 There are no direct workforce implications arising from this report.

Approved by: Sue Moorman Director of Human Resources

### **9. EQUALITIES IMPACT**

9.1 A full Equalities Analysis has been completed, incorporating the findings of the consultation.

9.2 The Equality Analysis found that that the upgrading of the CCTV network is likely to have a positive impact on protected groups by reducing fear of crime and improving the likelihood of detecting crimes included those that are often under reported such as hate crimes (e.g. motivated by ethnicity, sexuality,

religious faith or disability). The surveillance is restricted to public spaces and for the purposes set out in this report.

- 9.3 Whilst the feedback for upgrading the system was positive the service did identify two actions that could help improve awareness of the service and reassurance about its use.
- 9.4 Survey respondents who identified as having a disability were more likely to state they didn't know if how the Council would manage the use of the CCTV network fairly. The Council will produce an easy read version of the 12 principles that underpin the SC code of practice the Council is required to follow in order to follow and will share this through our VCS partners and on our website to increase accessibility of this information and reassure residents. 'Easy read' refers to the presentation of text in an accessible, easy to understand format. It is often useful for people with learning disabilities, and may also be beneficial for people with other conditions affecting how they process information.
- 9.5 Younger residents (aged 24 and under) who responded to the survey were more likely to say they didn't know if CCTV makes residents and visitors in the borough safer – although the majority agreed it reduces the fear of crime and ASB. The Council will raise awareness about the number of incidents detected and evidence supplied to the Police by the CCTV service via appropriate communication channels (including social media) on at least a quarterly basis.

Approved by: Yvonne Okiyo, Equalities Manager

## **10. ENVIRONMENTAL IMPACT**

- 10.1 There is limited impact on the environment as a result of this report. Some environmental anti-social behaviour and crime (e.g. Fly tipping) may be detected and prevented. This may lead to reduced environmental waste, noise or other issues that affect people's quality of life.

## **11. CRIME AND DISORDER REDUCTION IMPACT**

- 11.1 The proposed network upgrade directly supports the Council in discharging its statutory duty under Section 17 of the Crime and Disorder Act 1998 to exercise its various functions with due regard, and the need to do all that it reasonably can to prevent crime and disorder in its area. The upgrade of the CCTV network sustains and improves the Council's ability to work with partners including the Police to prevent and detect crime and disorder.
- 11.2 The new upgrade should improve the coverage and image quality of the system, to prevent crime and provide good quality evidence for detected crimes and helping to secure convictions and assure public safety. Camera



operators can also report crimes as they happen and direct emergency services to emerging incidents. The upgrade will contribute to the Council and its partners in delivering the Safer Croydon Strategy 2017-2020, including the monitoring of issues such as serious violence in the town centre and other public areas.

## **12. REASONS FOR DECISION**

- 12.1 The Council has a duty to do all that it reasonably can to prevent crime and disorder in its area and work towards delivering the objectives of the Safer Croydon Partnership plan, and ensure the CCTV network remains compliant with the Surveillance Camera Code of Practice. The upgrade of the public safety CCTV Network is also an action under the plan's priority "*Everyone feels safe in their street, their neighbourhood, and their home*". The award of £1m of Growth Zone funding will enable the upgrade of the CCTV network to support these aims.

## **13. OPTIONS CONSIDERED AND REJECTED**

- 13.1 The following options have been considered, with the two options highlighted in bold being the preferred options:

## **14. DATA PROTECTION IMPLICATIONS**

### **14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

No the decision to release £1m of Growth zone funding for the procurement of the CCTV network equipment will not involve the processing of personal data. The network itself will process personal data, specifically images of people caught on the network and recorded for the purposes of the service set out in Section 3 of this report. This processing will be managed in accordance with ICO and SCC statutory requirements.

### **14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

No. A DPIA already exists for the CCTV network and is refreshed on annual basis. The DPIA will be updated as part of the installation process and this is a requirement for the service to demonstrate compliance with the SCC code of practice. This is because each CCTV site will need to be assessed for proportionality and privacy considerations (e.g. using privacy filters to block out residential properties).

Approved by: Sarah Hayward, Director Violence Reduction Unit

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**CONTACT OFFICER:** Sarah Hayward, Director, Violence Reduction Network

**APPENDICES:** Appendix 1 – Equality Analysis Form

**BACKGROUND DOCUMENTS:** None

# Equality Analysis Form

## 1. Introduction

### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

<b>Directorate</b>	<b>Place</b>
<b>Title of proposed change</b>	<b>CCTV Infrastructure Upgrade</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Anthony Lewis – Head of Community Safety</b>

## 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

**The Council has identified up to £2m to modernise the current Closed Circuit Television (CCTV) network and replace the current analogue system with a new digital network. This is the first time that the council has upgraded its entire public CCTV network since the 1990s. The new network will use digital technology to increase capability, provide better quality images and allow the control centre to explore opportunities to provide new smart city services, such as air quality sensors to monitor pollution levels that could generate income.**

**This will require the replacement and installation of new cameras, poles, and the supporting hardware to enable the system to move from a largely analogue system to a completely digital solution.**

**Our CCTV control room monitors 96 fixed and 10 mobile cameras that cover the main routes and high-footfall areas across the borough, 24 hours a day, seven days a week. A map of all our cameras is available to view below. From April 2018 to March 2019 the service has monitored over 660 incidents of crime and supplied evidence for 598 police investigations.**

**We work to the Home Office Surveillance Camera Code of Practice which sets out 12 principles for the operation of CCTV (available below) and the need to balance cameras in public places with individuals' right to privacy.**

**Our public CCTV scheme objectives include:**

- **Preventing crime and anti-social behaviour and helping in the detection of criminal offences and anti-social incidents.**
- **Reducing the fear of crime and anti-social behaviour.**
- **Improving public protection.**
- **Assisting the emergency services in the location of missing, vulnerable people.**

**A full list can be found in the CCTV operations policy. The programme has been aligned with the corporate plan priority “Everyone feels safe in their street, their neighbourhood, and their home” and is a listed action.**

**To upgrade the infrastructure the Council is reviewing recent crime patterns and feedback from a public consultation exercise to review whether these objectives are still valid. The evidence base will also inform the siting of new and replacement cameras to ensure they are placed where they are need to meet these objectives.**

**As the consultation process has been completed Cabinet now have to make a decision regarding the procurement approach to purchase the equipment and services needed to implement the upgrade.**

### 3. Impact of the proposed change

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

#### 3.1 Deciding whether the potential impact is positive or negative

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**Table 1 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p><b>National Research:</b> There is well documented research linking the negative impact that crime and the fear of crime has on resident's physical and mental health. Of particular concern from a health perspective are limitations on outdoor physical activity, especially walking and cycling. Parents also report placing serious restrictions on children's activities even though both parents and children recognise the problematic effects of such restrictions on children's independent mobility, specifically for girls and young women [1]. Hirschfield (2004) demonstrated both the experience of victimisation and anxiety or</p>	<p>Under 24s were much less likely to agree that CCTV improve the safety and security of residents, visitors and the business community with only 3 out of 8 agreeing with this statement and 4 out of 8 stating they don't know.</p>	<p><b>National Research:</b> References [1] Hirschfield, Alex (2004), The health impact assessment of crime prevention. In: Health impact assessment: concepts, theory, techniques, and applications. Oxford University Press, Oxford, UK, pp. 341-349. ISBN 9780198526292</p> <p>[8] Home Office (2019), Arrests Data Published 18<sup>th</sup> March 2019,</p>

	<p>fear of crime were shown to impact upon health through ‘symptoms’ such as stress, sleeping difficulties, loss of appetite, depression, loss of confidence and health harming ‘coping mechanisms’ (e.g. smoking, alcohol). Similar relationships described as ‘detrimental emotional impacts’ have been identified in the British Crime Survey [1].</p> <p>Analysis of the Crime Survey for England Wales responses over 3 years (20014-2016-17) showed younger people (aged 16-24) were more likely to say they were victims of crime in the previous 12 months than older people [9].</p> <p>National data shows that 81% of all arrestees are aged 21 or over. However, there is variation when analysing the reasons for arrest. For example, although persons under 21 years old accounted for 19% of all arrests, they made up 46% of arrests for robbery offences and just over a third (35%) of possession of weapons offences [8].</p> <p><b>CCTV Upgrade Consultation</b></p> <p>Due to the low number of responses from the under 24 age group additional consultation was undertaken at the New Addington community league on 15th August 2019, with another ten hard copy versions of the survey completed.</p> <p>There were similar patterns of agreement that CCTV reduced crime and ASB across all age groups ranging from 77% for under 24s to 85% for over 45s.</p>		<p><a href="https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/number-of-arrests/latest">https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/number-of-arrests/latest</a></p> <p>[9] Home Office (2019), Victims of Crime Published 7<sup>th</sup> December 2018  <a href="https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest">https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/crime-and-reoffending/victims-of-crime/latest</a></p> <p><b>CCTV Upgrade Consultation:</b></p> <p>The CCTV upgrade consultation was run between 24<sup>th</sup> June and 4<sup>th</sup> August 2019 and received 152 responses. The consultation captured relevant equalities information including Age, Gender, Sexuality, Ethnicity and Disability.</p>
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	<p><b>Positive Impact:</b></p> <p>The College of Policing review of CCTV in 2013 indicates that surveillance cameras might reduce crime by: a) deterring criminals by increasing their perception of the risk of getting caught; b) increasing the actual risk of getting caught; c) encouraging the public use of an area thus affecting the criminals' perceptions of risk (by increasing informal surveillance by the public); d) encouraging potential victims to take additional precautions; e) signalling improvements in the area to the public which encourages community pride; f) supporting the effective deployment of security staff to incidents more effectively [6].</p> <p>CCTV can provide high quality evidence (that can meet required evidential standards) to assist in Police investigations and improve the likelihood of a fair criminal justice process, including an audit for processing the evidence through the criminal justice system. In addition to providing evidence against suspects, the use of evidence gathered by CCTV can protect residents against being wrongfully suspected or convicted of crimes [7]. The footage captured also provides greater transparency regarding incidents and crime and ASB and arrests by the Police.</p>		
Disability	<p><b>National research</b></p> <p>The fear of crime and residents' attempts to limit their perceived risk of becoming a victim of crime also has damaging</p>	<p><b>CCTV Consultation</b></p>	<p><b>National Research:</b></p> <p>[2] Lorenc T, Petticrew M, Whitehead M, et al. (2013) Fear of crime and the</p>



	<p>consequences from a public health perspective that has been the subject of considerable academic research. Lorenc et al (2013), highlight that the consequence of fear of crime is to limit people’s activities, including social and cultural activities, sometimes leading to social isolation. This can have a disproportionate impact for women, older people and people with disabilities.</p> <p>Fear of crime is also associated with poorer mental health, reduced physical functioning on objective and subjective indicators, and lower quality of life. Participants of a study conducted by Stafford et al (2007) reporting greater fear were 1.93 times as likely to have depression as those reporting lower fear of crime and had lower mental health scores They exercised less, saw friends less often, and participated in fewer social activities compared with the less fearful participants, linking curtailed physical and social activities with the fear of crime [3]. The impacts of fear of crime may make up an appreciable proportion of the costs of crime [4]. A study by Dustman &amp; Fasani (2012) found that the effect of a one standard deviation increase in the crime rate on mental health is about twice to four times as large as a one standard deviation increase in the local employment rate. The effects of local crime on mental distress of citizens are therefore large, with possibly significant economic costs [5]. These findings are relevant for this bid, since they strongly indicate that, from a health improvement and economic perspective, reducing the public’s fear of crime may be as important as reducing actual crime rates.</p>	<p>There were some differences in responses from respondents who identified as having a disability.</p> <p>Only 9 out of 23 respondents were confident that Croydon Council will use the public CCTV cameras in a fair and responsible way compared to 72 out of 92 respondents who didn’t identify as disabled (78%). 10 respondents answered ‘don’t know’ to this question suggesting a lack of awareness of the code of practice the Council is meant to follow.</p>	<p>environment: systematic review of UK qualitative evidence. BMC Public Health. 2013;13:496. Doi:10.1186/1471-2458-13-496</p> <p>[3] Stafford M, Chandola T, Marmot M. (2007), Association Between Fear of Crime and Mental Health and Physical Functioning. American Journal of Public Health. 2007;97(11):2076-2081. Doi:10.2105/AJPH.2006.097154.</p> <p>[4] Dolan, P., &amp; Peasgood, T. (2007). Estimating The Economic And Social Costs Of The Fear Of Crime. The British Journal of Criminology, 47(1), 121-132</p> <p>[5] Dustmann, C. and Fasani, F. (2016), The Effect of Local Area Crime on Mental Health. Econ J, 126: 978–1017. Doi:10.1111/eoj.12205</p> <p>[6] College of Policing (2013), The effects of CCTV on Crime What Works Briefing, Coventry, UK</p> <p>[7] Hadjimatheou K. (2017), Surveillance Technologies, Wrongful Criminalisation, and the Presumption of Innocence. Philosophy &amp; Technology</p>
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	<p>As outlined in the Age section providing public CCTV can help mitigate some of the negative impacts created by fear of Crime.</p> <p>The number of Disability motivated offences reported in Croydon for July 2018 to June 2019 was 19 crimes – above the London average of 12 per borough [12].</p> <p><b>CCTV Upgrade Consultation</b></p> <p>The consultation supports the academic national research around reducing the fear of crime. Of those respondents who identified that they had a disability;</p> <ul style="list-style-type: none"> <li>• 20 out of 23 agreed or strongly agreed that CCTV reduces the fear of crime and ASB</li> <li>• 20 out of 23 agreed or strongly agreed that CCTV improves the safety and security of residents, visitors and the business community who use the facilities covered by the CCTV scheme.</li> <li>• 18 out of 23 stating it the upgrade system would make them feel safer at night (4 stating it would have no impact).</li> </ul> <p><b>Positive Impact</b></p> <p>The College of Policing review of CCTV in 2013 indicates that surveillance cameras might reduce crime by: a) deterring criminals by increasing their perception of the risk of getting caught; b) increasing the actual risk of getting caught; c) encouraging the public use of an area thus affecting the</p>		<p>March 2017, Volume 30, Issue 1, pp 39–54</p> <p>[12] Safer Croydon Partnership Performance Dashboard.</p> <p><b>CCTV Upgrade Consultation:</b></p> <p>The CCTV upgrade consultation was run between 24<sup>th</sup> June and 4<sup>th</sup> August 2019 and received 152 responses. The consultation captured relevant equalities information including Age, Gender, Sexuality, Ethnicity and Disability.</p>
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	<p>criminals' perceptions of risk (by increasing informal surveillance by the public); d) encouraging potential victims to take additional precautions; e) minimize improvements in the area to the public which encourages community pride; f) supporting the effective deployment of security staff to incidents more effectively [6].</p> <p>CCTV can provide high quality evidence (that can meet required evidential standards) to assist in Police investigations and improve the likelihood of a fair criminal justice process, including an audit for processing the evidence through the criminal justice system. In addition to providing evidence against suspects, the use of evidence gathered by CCTV can protect residents against being wrongfully suspected or convicted of crimes [7]. The footage captured also provides greater transparency regarding incidents and crime and ASB and arrests by the Police.</p>		
<p>Gender</p>	<p><b>National Research</b></p> <p>Lorenc et al (2013), highlight that the consequence of fear of crime is to limit people's activities, including social and cultural activities, sometimes leading to social isolation. This can have a disproportionate impact for women, older people and people with disabilities.</p> <p>Increasing CCTV can help reduce the fear of crime and likelihood of victimization from some offence types.</p> <p>Men are more likely to be arrested than women. Men from ethnic groups are</p>		<p><b>National Research:</b></p> <p>[2] Lorenc T, Petticrew M, Whitehead M, et al. (2013) Fear of crime and the environment: systematic review of UK qualitative evidence. BMC Public Health. 2013;13:496. Doi:10.1186/1471-2458-13-496</p> <p>[6] College of Policing (2013), The effects of CCTV on Crime</p>

disproportionately represented. Home office national arrest figures for 2017-18 show [8]

- Overall, men were over 5 times as likely to be arrested as women – there were 22 arrests for every 1,000 men, and 4 arrests for every 1,000 women
- Black men were over three times as likely to be arrested than White men – there were 66 arrests for every 1,000 Black men, and 18 arrests for every 1,000 White men
- Black women were over twice as likely to be arrested as White women – there were 7 arrests for every 1,000 Black women, and 3 arrests for every 1,000 White women

**CCTV Upgrade Consultation**

Respondents who identified as female were generally more supportive of the role of CCTV.

- 85.2% of female respondents (out of 54) stated that they agreed CCTV reduced the fear of crime and ASB, compared to 78% (out of 59) male respondents.
- 92.5% of female respondents (out of 53) stated that they agreed that CCTV improved the safety and security of residents, visitors and businesses, compared to 88.1% (out of 59) of male respondents.

What Works Briefing, Coventry, UK

[7] Hadjimatheou K. (2017), Surveillance Technologies, Wrongful Criminalisation, and the Presumption of Innocence. Philosophy & Technology March 2017, Volume 30, Issue 1, pp 39–54

[8] Home Office (2019), Arrests Data Published 18<sup>th</sup> March 2019, <https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/number-of-arrests/latest>

- 88.5% (out of 52) of female respondents felt the proposed CCTV upgrade would make them feel safer in day time compared to 67.8% (out of 59) men.

**Positive Impact:**

The College of Policing review of CCTV in 2013 indicates that surveillance cameras might reduce crime by: a) deterring criminals by increasing their perception of the risk of getting caught; b) increasing the actual risk of getting caught; c) encouraging the public use of an area thus affecting the criminals' perceptions of risk (by increasing informal surveillance by the public); d) encouraging potential victims to take additional precautions; e) minimize improvements in the area to the public which encourages community pride; f) supporting the effective deployment of security staff to incidents more effectively [6].

CCTV can provide high quality evidence (that can meet required evidential standards) to assist in Police investigations and improve the likelihood of a fair criminal justice process, including an audit for processing the evidence through the criminal justice system. In addition to providing evidence against suspects, the use of evidence gathered by CCTV can protect residents against being wrongfully suspected or convicted of crimes [7]. The footage captured also provides greater transparency regarding incidents and crime and ASB and arrests by the Police.

<p>Gender Reassignment</p>	<p>Hate crime in England and Wales is defined as, 'any criminal offence which is perceived, by the victim or any other person, to be motivated by hostility or prejudice towards someone based on a personal characteristic'.</p> <p>Transgender identity is one of the 5 personal characteristics within this definition [10].</p> <p>The number of Transgender motivated offences reported in Croydon for July 2018 to June 2019 was just 9 crimes – slightly the above the London average of 8 per borough [12].</p> <p>Police recorded crime is known to under report Hate crimes. Although it cannot currently provided a specific baseline for hate crime motivated by gender reassignment, the CSEW asks people who experienced crimes in the past year whether the police came to know about the incident, that is, whether they reported themselves or the police came to know about it in another way (for example, someone else reported it or the police arrived at the scene of crime). Based on the 2015/16 to 2017/18 CSEW, overall 53 per cent of hate crime incidents came to the attention of the police.</p> <p>CSEW survey data shows that the victim of a hate crime is more likely to have suffered personal crime than household crime compared to a victim of any crime. According to the surveys, victims of hate crime were more likely to be</p>		<p><b>National Research:</b></p> <p>[7] Hadjimatheou K. (2017), Surveillance Technologies, Wrongful Criminalisation, and the Presumption of Innocence. Philosophy &amp; Technology March 2017, Volume 30, Issue 1, pp 39–54</p> <p>[10] Home Office (2018), Hate Crime, England and Wales, 2017/18 Statistical Bulletin 20/18 published 16 October 2018</p> <p>[11] House of Commons Library (2019), Hate Crime Statistics, Briefing Paper Number 08537 , 28 March 2019</p> <p>[12] Safer Croydon Partnership Performance Dashboard.</p>
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	<p>impacted emotionally and psychologically following a crime than victims of all crime. For instance, 40% of victims of hate crime felt a loss of confidence or vulnerable following the crime compared with 18% of those for all crimes. [11]</p> <p><b>Positive Impact:</b> Hate crimes are often unreported. CCTV can provide high quality evidence (that can meet required evidential standards) to assist in Police investigations and improve the likelihood of detections and a fair criminal justice process, including an audit for processing the evidence through the criminal justice system. In addition to providing evidence against suspects, the use of evidence gathered by CCTV can protect residents against being wrongfully suspected or convicted of crimes [7]. The footage captured also provides greater transparency regarding incidents and crime and ASB and arrests by the Police.</p>		
<p>Marriage or Civil Partnership</p>	<p>There is no data to suggest CCTV has a positive or negative impact. There is no data to suggest CCTV has a positive or negative impact.</p>	<p>There is no data to suggest CCTV has a positive or negative impact.</p>	
<p>Religion or belief</p>	<p>Hate crime in England and Wales is defined as, ‘any criminal offence which is perceived, by the victim or any other person, to be motivated by hostility or prejudice towards someone based on a personal characteristic’.</p> <p>Religion or beliefs is one of the 5 personal characteristics within this definition.</p>		<p><b>National Research:</b></p> <p>[7] Hadjimatheou K. (2017), Surveillance Technologies, Wrongful Criminalisation, and the Presumption of Innocence. Philosophy &amp; Technology March 2017, Volume 30, Issue 1, pp 39–54</p>

	<p>The number of Faith Hate offences reported in Croydon for July 2018 to June 2019 was 36 crimes – below the London average of 63 per borough [12].</p> <p>Police recorded crime is know to under report Hate crimes. The CSEW asks people who experienced crimes in the past year whether the police came to know about the incident, that is, whether they reported themselves or the police came to know about it in another way (for example, someone else reported it or the police arrived at the scene of crime). Based on the 2015/16 to 2017/18 CSEW, overall 53 per cent of hate crime incidents came to the attention of the police [10].</p> <p>CSEW survey data shows that the victim of a hate crime is more likely to have suffered personal crime than household crime compared to a victim of any crime. According to the surveys, victims of hate crime were more likely to be impacted emotionally and psychologically following a crime than victims of all crime. For instance, 40% of victims of hate crime felt a loss of confidence or vulnerable following the crime compared with 18% of those for all crimes [10].</p> <p><b>Positive Impact:</b></p> <p>Hate crimes are often unreported. CCTV can provide high quality evidence (that can meet required evidential standards) to assist in Police investigations and improve the likelihood of detections and a fair criminal justice process, including an audit for processing the evidence through the</p>		<p>[10] Home Office (2018), Hate Crime, England and Wales, 2017/18 Statistical Bulletin 20/18 published 16 October 2018</p> <p>[11] House of Commons Library (2019), Hate Crime Statistics, Briefing Paper Number 08537 , 28 March 2019</p> <p>[12] Safer Croydon Partnership Performance Dashboard.</p>
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	<p>criminal justice system. In addition to providing evidence against suspects, the use of evidence gathered by CCTV can protect residents against being wrongfully suspected or convicted of crimes [7]. The footage captured also provides greater transparency regarding incidents and crime and ASB and arrests by the Police.</p>		
<p>Race</p>	<p><b>National Research</b> - see age, disability and gender section</p> <p><b>CCTV Upgrade Consultation;</b></p> <p>The consultation supports the academic national research around reducing the fear of crime.</p> <p>Of the BAME respondents to the consultation;</p> <ul style="list-style-type: none"> <li>• 81% (out of 32) stated they were more likely to feel safe in the day and night Tim if CCTV was upgraded compared to 72% (out of 82) and 78% of respondents identifying as White.</li> <li>• 82% (out of 38) felt that CCTV reduced the fear of crime and anti-social behavior compared to 77% (out of 84) of White respondents</li> <li>• 89% (out of 38) felt CCTV improved the safety and security of residents, visitors and the business community</li> <li>• 5 respondents (out of 38) felt CCTV had a negative impact on personal privacy compared to 10 White respondents (out of 83).</li> </ul>		<p><b>National Research:</b></p> <p>[7] Hadjimatheou K. (2017), Surveillance Technologies, Wrongful Criminalisation, and the Presumption of Innocence. Philosophy &amp; Technology March 2017, Volume 30, Issue 1, pp 39–54</p> <p>[8] Home Office (2019), Arrests Data Published 18<sup>th</sup> March 2019, <a href="https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/number-of-arrests/latest">https://www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/number-of-arrests/latest</a></p> <p>[10] Home Office (2018), Hate Crime, England and Wales, 2017/18 Statistical Bulletin 20/18 published 16 October 2018</p> <p>[12] Safer Croydon Partnership Performance Dashboard.</p> <p><b>CCTV Upgrade Consultation:</b></p>

	<ul style="list-style-type: none"> <li>68% (out of 38) were confident that the Council will use its CCTV cameras in a fair and responsible manner compared to 70% (out of 83) White respondents.</li> </ul> <p>Please note each % is the proportion of respondents that answered each specific question.</p> <p><b>CSEW</b></p> <p>Analysis of the Crime Survey for England Wales responses over 3 years (20014-2016-17) showed people aged 16 to 24 years from the White, Black and Mixed ethnic groups were more likely to be a victim of crime than people in the same age group from the Asian and Other ethnic groups</p> <p>In 2015/16, a smaller proportion of White people reported a fear of crime compared with Asian people, Black people, and those from the Other ethnic group [9].</p> <p><b>London Arrest data / Victimization data</b></p> <p>The Home Office release arrest data at Force level by ethnicity every year.</p> <p>For London 2017/18 data shows, there were 19 arrests for every 1,000 ethnic minority people compared with 12 arrests for every 1,000 White people [8].</p> <p>The number of Racially motivated offences reported in Croydon for July 2018 to June 2019 was 554 crimes – above the London average of 479 per borough [12].</p>		<p>The CCTV upgrade consultation was run between 24<sup>th</sup> June and 4<sup>th</sup> August 2019 and received 152 responses. The consultation captured relevant equalities information including Age, Gender, Sexuality, Ethnicity and Disability.</p>
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	<p><b>Positive Impact:</b>                  CCTV can provide high quality evidence (that can meet required evidential standards) to assist in Police investigations and improve the likelihood of a fair criminal justice process, including an audit for processing the evidence through the criminal justice system. In addition to providing evidence against suspects, the use of evidence gathered by CCTV can protect residents against being wrongfully suspected or convicted of crimes [7]. The footage captured also provides greater transparency regarding incidents and crime and ASB and arrests by the Police.</p>		
<p>Sexual Orientation</p>	<p>Hate crime in England and Wales is defined as, 'any criminal offence which is perceived, by the victim or any other person, to be motivated by hostility or prejudice towards someone based on a personal characteristic'.</p> <p>Sexual Orientation is one of the 5 personal characteristics within this definition.</p> <p>The number of Homophobic offences reported in Croydon for July 2018 to June 2019 was 64 crimes – below the London average of 73 per borough [12].</p> <p>Police recorded crime is known to under report Hate crimes. Although it cannot currently provide a specific baseline for hate crime motivated by sexual orientation, The CSEW asks people who experienced crimes in the past year whether the police came to know about the incident, that is,</p>		<p><b>National Research:</b></p> <p>[7] Hadjimatheou K. (2017), Surveillance Technologies, Wrongful Criminalisation, and the Presumption of Innocence. Philosophy &amp; Technology March 2017, Volume 30, Issue 1, pp 39–54</p> <p>[10] Home Office (2018), Hate Crime, England and Wales, 2017/18 Statistical Bulletin 20/18 published 16 October 2018</p> <p>[11] House of Commons Library (2019), Hate Crime Statistics, Briefing Paper Number 08537, 28 March 2019</p>

	<p>whether they reported themselves or the police came to know about it in another way (for example, someone else reported it or the police arrived at the scene of crime). Based on the 2015/16 to 2017/18 CSEW, overall 53 per cent of hate crime incidents came to the attention of the police [10].</p> <p>CSEW survey data shows that the victim of a hate crime is more likely to have suffered personal crime than household crime compared to a victim of any crime. According to the surveys, victims of hate crime were more likely to be impacted emotionally and psychologically following a crime than victims of all crime. For instance, 40% of victims of hate crime felt a loss of confidence or vulnerable following the crime compared with 18% of those for all crimes [11].</p> <p><b>CCTV Upgrade Consultation;</b> Only 7 respondents identified as either Lesbian, Gay or Bi-sexual. 2 respondents self-described their identity.</p> <p>Whilst the majority agreed with that the proposal would reduce fear of crime and ASB the proportion was lower than respondents who identified as heterosexual. Due to the low numbers of respondents it is not possible to determine if this difference is statically significant.</p> <p><b>Positive Impact:</b></p> <p>Hate crimes are often unreported. CCTV can provide high quality evidence (that can meet required evidential standards) to assist in Police investigations and improve the</p>		<p>[12] Safer Croydon Partnership Performance Dashboard.</p>
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	likelihood of detections and a fair criminal justice process, including an audit for processing the evidence through the criminal justice system. In addition to providing evidence against suspects, the use of evidence gathered by CCTV can protect residents against being wrongfully suspected or convicted of crimes [7]. The footage captured also provides greater transparency regarding incidents and crime and ASB and arrests by the Police.		
Pregnancy or Maternity	There is no specific evidence related to the impact of Public Community Safety CCTV on residents or visitors who are pregnant or on maternity leave.	There is no specific evidence related to the impact of Public Community Safety CCTV on residents or visitors who are pregnant or on maternity leave.	

**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:		
Additional information needed and or Consultation Findings	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example – **Likelihood (2) x Severity (2) = 4**

**Table 4 – Equality Impact Score**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

**Key**

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

<b>Column 1</b>  <b>PROTECTED GROUP</b>	<b>Column 2</b>  <b>LIKELIHOOD OF IMPACT SCORE</b>  Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	<b>Column 3</b>  <b>SEVERITY OF IMPACT SCORE</b>  Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	<b>Column 4</b>  <b>EQUALITY IMPACT SCORE</b>  Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.  <b>Equality impact score = likelihood of impact score x severity of impact score.</b>
Age	1	1	1
Disability	1	2	2
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimize any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	Some respondents didn't know how the Council would manage use of CCTV fairly.	Produce an easy read summary of the SCC code of practice for the Council website and disseminate via Disability forum	Dave Eastoe	31 <sup>st</sup> October 2019
Race	<b>None</b>			
Sex (gender)	<b>None</b>			



## Equality Analysis

Gender reassignment	<b>None</b>			
Sexual orientation	<b>None</b>			
Age	Some respondents didn't know if CCTV makes residents and visitors in the borough safer.	Promote the number of incidents detected and evidence supplied to the Police by CCTV service via appropriate communication channels on at least a quarterly basis.	Dave Eastoe / Briony Key	31 <sup>st</sup> October 2019
Religion or belief	<b>None</b>			
Pregnancy or maternity	<b>None</b>			
Marriage/civil partnership	<b>None</b>			

### 6. Decision on the proposed change

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Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
<b>Decision</b>	<b>Definition</b>	<b>Conclusion - Mark 'X' below</b>
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. The analysis does not suggest any major changes to the planned restructure - CCTV should help reduce the fear of crime and support greater transparency and fairness within the criminal justice system that will benefit residents with identified equalities characteristics, who are often disproportionately affected by crime and the fear of crime. The one action identified will be to create an Easy read version of SCC code of practice and disseminate via the Disability forum so that residents who identify as having a disability can understand the polices and processes the council must operate within.	<b>x</b>
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b>	

## Equality Analysis

Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the 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. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b>	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: CCB and Cabinet Date: 21 <sup>st</sup> October 2019 (Cabinet)

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### 7. Sign-Off

<b>Officers that must approve this decision</b>		
<b>Equalities Lead</b>	<b>Name:</b> Yvonne Okiyo <b>Position:</b> Equalities Manager	<b>Date:</b> 29.08.19
<b>Director</b>	<b>Name:</b> Sarah Hayward <b>Position:</b> Director Violence Reduction Network	<b>Date:</b> 11 September 2019

## For General Release

<b>REPORT TO:</b>	<b>CABINET 21 OCTOBER 2019</b>
<b>SUBJECT:</b>	<b>A Housing and Homelessness Strategy for Croydon</b>
<b>LEAD OFFICER:</b>	<b>Hazel Simmonds, Executive Director – Gateway, Strategy and Engagement</b>
<b>CABINET MEMBER:</b>	<b>Cllr Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes and Gateway Services</b>
<b>WARDS:</b>	<b>All</b>
<p><b>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</b></p> <p>This report builds on the commitment in the Council’s Corporate Plan (2018) for ‘<i>good, decent homes, affordable for all</i>’ and sets out the Council’s strategic approach to housing, in all its forms, reflecting the three themes set out in the Corporate Plan: <i>new homes, quality homes and homes for everyone</i>.</p>	

### **FINANCIAL IMPACT**

There are no direct financial implications arising from the recommendations in this report. Any specific proposals requiring capital investment or with implications for the Council’s revenue budgets will need to be reviewed and approved via the appropriate approval route ahead of implementation.

### **FORWARD PLAN KEY DECISION REFERENCE NO.: 1919CAB**

This is a Key Decision as defined in the council’s constitution. The decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee by the requisite number of councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

### **1. RECOMMENDATIONS**

The Cabinet is recommended to:

- 1.1 Agree the draft priorities for a Housing Strategy and Action Plan for Croydon and authorise the commencement of a process of consultation and engagement with key external stakeholders to develop the strategy and action plan.
- 1.2 Delegate authority to the Cabinet Member for Homes and Gateway Services to agree the final draft of the Housing Strategy and Action Plan for consultation (currently under development).
- 1.3 Delegate authority to the Cabinet Member for Homes and Gateway Services to recommend the updated Housing Strategy and Action Plan to full Council for

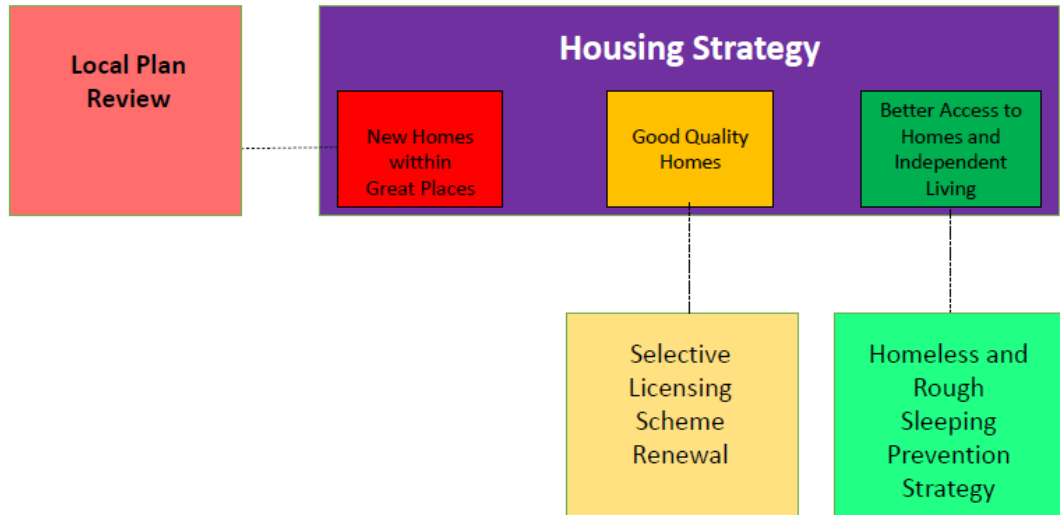
adoption following consideration of the outcome of the consultation and engagement.

- 1.4 Agree the draft priorities for a Homelessness and Rough Sleeping Prevention Strategy for Croydon and authorise the commencement of a process of statutory consultation and engagement with key external stakeholders to develop the strategy.
- 1.5 Delegate authority to the Cabinet Member for Homes and Gateway Services to agree the final draft of the Homelessness and Rough Sleeping Prevention Strategy for consultation (currently under development).
- 1.6 Delegate authority to the Cabinet Member for Homes and Gateway Services to recommend the updated Homelessness and Rough Sleeping Prevention Strategy to full Council for adoption following consideration of the outcome of the consultation and engagement.

## **2. EXECUTIVE SUMMARY**

- 2.1 Croydon is in the midst of a housing crisis. We are a growing borough, with more opportunities for education, employment and leisure than ever before, yet the supply of good quality housing is not increasing at a fast enough rate. What is more, many of our residents cannot afford to rent or buy a home that meets their needs and almost a quarter of private renters live in homes with a serious home hazard. A decent, stable home is a basic need for all of us: unsafe, expensive, overcrowded housing impacts on people's health and life chances. Securing safe, affordable, secure housing is often the first step to successful recovery and independence for individuals and families who have experienced addiction, trauma or violence.
- 2.2 We are determined to do everything required so that all in Croydon have the chance of a decent home that they can afford and call their own. Since it was introduced, the right to buy has reduced Croydon council stock by almost half. Council and housing association homes now make up just one in six of all housing in Croydon. This is fewer than in many London boroughs, even though Croydon is the second largest borough in London, and is not enough to meet the local need for affordable housing either now or in the future. Almost 1,000 more council homes will have been built or acquired by the Council by 2022. Nevertheless, the private rented sector must remain a strong part of housing provision in Croydon, as it has always been.
- 2.3 This Council rejects the Government's market-led definition of affordable housing (up to 80% of market rent) that many Croydon people in need cannot afford. 'Genuinely affordable' means different things to different people, depending on their income. We will adopt a definition based on local income levels to ensure homes of different types are created, from social rented, to intermediate rent and shared ownership, that suit various income levels in Croydon and provide options that do not force people to spend more than a third of household income on housing.

- 2.4 It's not just about new homes and better homes, but better places too, where residents want to live, work and socialise. To ensure our existing neighbourhoods are successful, and create new sustainable communities, the Council will engage with residents and partners on plans for the social and physical infrastructure required alongside new homes. This could include new schools, health and wellbeing centres, empty shops returned to use, new workspaces, and better community and leisure facilities; in short, all the other elements of social and civic life that make places work.
- 2.5 The Council declared a climate emergency on 8 July 2019 restating its commitment to tackle climate change. This strategy must play its part, as homes are currently directly responsible for [18%](#) of all carbon dioxide emissions in the UK. We will continue to seek high standards of sustainable design and construction from new developments, conversions and refurbishment work. However, existing homes have by far the greatest impact on carbon dioxide emissions. Investment in council homes will increase their energy efficiency. We must also enable private tenants and homeowners to access advice, and assistance if needed, to reduce their energy use.
- 2.6 This report outlines the Council's strategic priorities for improving the supply, quality and range of homes for Croydon residents, along with an initial series of workstreams to translate these priorities into action. We aim to make best use of our assets and resources, seek new opportunities and investment, and work with our partners to
- create **New Homes in Great Places** that local people can afford to rent or buy
  - ensure existing social and private homes become **Good Quality Homes**; and
  - provide **Better Access to Homes and Independent Living**, including ensuring people can live independently at home for as long as possible, and preventing and relieving homelessness.
- Our priorities under these three aims will form the basis of a housing strategy.
- 2.7 The report seeks authority to commence consultation and obtain delegated authority for the Cabinet Member for Homes and Gateway Services to recommend to full Council for adoption final versions of the Housing Strategy and Homelessness and Rough Sleeping Prevention Strategy following consultation. The Scrutiny and Overview Committee will scrutinise and review the draft strategies. The recommendations set out in this report do not have any direct impact on the Council's financial planning and budget strategy. Any specific proposals requiring capital investment or with implications for the Council's revenue budgets will be considered under the existing financial regulations and brought for Cabinet approval if required by the scheme of financial delegation.
- 2.8 The diagram below shows the interrelationship between the reports to be considered by this Cabinet.



### 3. Housing need in Croydon

- 3.1 Croydon's population is growing. In 2019 there are an estimated 164,763 households in the borough (2014-based projections). By 2029 this will increase by 24,726 (15%) to 189,489. People are living longer. More people are living on their own. We have the most schoolchildren in London – they will need homes in future, as well as young people ready to leave home. Based on household projections between 2019 and 2039, the Council's Strategic Housing Market Assessment (SHMA) has concluded that Croydon needs 46,040 new homes by 2039 to meet the borough's housing need. Given the planning constraints at the time it was adopted, the [current Local Plan \(2018\)](#) only plans for 32,890 homes up to 2036, which equates to 1,645 new homes a year. However, a Local Plan Review is now underway and is planning to meet the entire need of 46,040 homes. The Local Plan Review and the possible strategic options for how the planning process can assist in meeting the need for homes in the borough is subject of a separate Cabinet Report.
- 3.2 There is a need for both large and small homes across tenures, affordable rented, affordable home ownership as well as market housing for rent and sale. The Council is committed to securing an increase in supply for the borough across all tenures, creating mixed neighbourhoods. The size mix will vary according to tenure, recognising the role which larger family homes can play in releasing the supply of smaller homes and the role of smaller homes in providing housing options for new households and under-occupiers wishing to down-size.
- 3.3 Many local people cannot afford to buy or rent a home in Croydon. Median (average) house prices are over 11 times median incomes. Median rents are between £116 and £262 per month more expensive than Local Housing Allowance (LHA) rates, the maximum rent that could be covered by benefit. 5,468 households were on the Council's housing register on 31 March 2019, many more than can be housed either in council properties or through partner housing associations. In 2018/19 only 570 social homes were let to new tenants. Many thousands in housing need due to overcrowding do not meet the qualifying threshold for our housing register.

- 3.4 Between 2016 and 2036, older persons age groups in Croydon are forecast to experience the most significant proportional growth, with the 65 years and over age group increasing by 65% compared with an overall population increase in Croydon of 14.8%. Within the older population growth forecast the 70-74 age group increases by approximately 82%, 75-79 increases by approximately 70% and the 85 years and over group increases by 84% (Source: demographic projections/2014-based sub-national household projections). Some may age in private rented accommodation and find it harder to afford in later life. Some special sheltered (extra care) and sheltered accommodation is outdated and needs upgrading or replacing. Some people living in residential care homes are better suited to extra care housing. To meet this need and rising need in the wider population, a new scheme of 37 units of special sheltered accommodation is needed as well as the focussing of existing schemes on people needing more hours of care. The care provision in six special sheltered housing schemes will transfer to the Council by January 2020 and develop a service to deliver tenant-focused care in homes for life. The ability to deliver more care to tenants if they need it is intended to reduce the need for residential care. More detailed research is required to detail the housing requirements of older people in Croydon, including those who are under-occupying family homes. Our priority will be to enable people to remain independent in their own homes for as long as possible.
- 3.5 Of those households awaiting social housing on the Council's housing register, currently 109 need a home adapted for or built for wheelchair use. In addition, there is a need in the borough for the supply of private market (rent or sale) homes that are accessible and adapted or can be adapted for wheelchair users. Current planning standards and building regulations require new homes to be flexible for future adaptations, but we will seek to ensure that more new homes meet higher standards for meeting residents' needs as they grow older.
- 3.6 Croydon has the largest population of young people in London. Between 2016 and 2036 the 10-19 population is expected to increase by 18.0%. Unemployment remains higher amongst the younger population. Since 2014, there has been significant growth in the numbers of young homeless people. Croydon has around 500 care leavers who are currently accommodated in the private rented sector including houses in multiple occupation (HMOs). In future demand is likely to be in the region of 150 a year. HMOs are not always suitable for these vulnerable young people. There is a need to develop options for self-contained accommodation to give them the best start in life.
- 3.7 The number of people with complex health and social care needs, such as people with physical or learning disabilities and people recovering from a mental health problem is increasing. There is currently a shortage of good quality housing for supported living in Croydon. Many people living in residential care homes could be managing their own tenancy and living more independently, with support. We also wish to move from a reliance on expensive nursing care provision towards the use of residential care for our residents, where appropriate. Some people with physical and learning disabilities are living with ageing parents and in future will need adapted accommodation with support. Currently there are 60 people in the borough waiting for supported living placements including 40 people with mental health needs; this is expected to increase to 112 by 2025. The ratio of people aged

25-65 with a learning and/or physical disability in residential care homes in relation to supported living in Croydon is 55:45. Improving this to 50:50 by 2025 would require another 61 units, bringing the total need to 173 units over five years. These figures do not take account of fortuitous vacancies within existing stock. When placing residents with external providers of supported living, the Council's strong preference is that this should only be with partners who are Registered Providers, as this enables 100% of supported exempt accommodation funding to be claimed back.

3.8 The Council published its Homelessness Review in August 2018. Its findings (updated where appropriate) may be summarised as follows:

### 3.8.1 Levels of homelessness

- **Homelessness demand:** the number of people approaching the Council annually for assistance has been consistently around 3,500, and more approach local advice services and community groups looking for help. In the last couple of years, however, we have changed our approach and put more resources into preventing homelessness, helping more than 1650 people at risk of losing their homes in 2018/19.
- **Causes of homelessness applications:** losing a private rented tenancy is the most common cause of homeless (and has been for a number of years), followed by someone's parents or relatives not being able to continue to accommodate them, and domestic violence.
- **Underlying drivers of homelessness:**
  - **Poverty:** Croydon residents earn less, and are employed in less well paid occupations than other parts of London. Welfare reform has reduced the support that families and individuals receive to meet their housing and other vital needs. The Local Housing Allowance (LHA) has fallen far behind market rents. Universal Credit and other welfare reforms are associated with increased homelessness and poverty making it harder for many people to find a home.
  - **The housing supply crisis:** Failure to build in sufficient volumes over the past 30 years compounded by the reduction in the government grant for social housing has led to an overall shortage of housing, including affordable housing in Croydon. The government introduced a definition of affordable housing as being up to 80% of market rent, which is not affordable for many people in Croydon
  - **Housing affordability:** Average house prices are over 10 times average incomes. Because market rents in Croydon are so high, many people no longer have the option of saving while they rent. Changes to and freezing housing benefit rates until 2020, and the introduction of Universal Credit have made it harder for people to afford private rented homes even with benefit help.
  - **Austerity:** Government austerity has impacted on services that help prevent homelessness, such as housing support, hostels, and mental health, drug and alcohol services.



- **Multiple needs:** Most support providers tell us that they are catering to people with more complex needs than before.
- **European Economic Area nationals and other migrants:** Since 2014 non-UK nationals have limited access to benefits and housing. Over 60% of the increase in rough sleeping in London is from non-UK nationals.
- **Temporary accommodation:** The Council has a significant number of people housed in temporary accommodation and emergency accommodation). In 2018/19 1,047 homeless households were in bed and breakfast, of which 52% were families and 48% were vulnerable single people. Most single people are placed in supported rather than general needs housing. On 31 March 2019 there were 653 homeless households in bed and breakfast hotels, including 1,010 children.
- **Rough sleeping:** We have around 15 people sleeping rough in Croydon on a typical night. In 2018/19, we were aware of 274 people sleeping rough in Croydon, of which only 27 had returned to the streets having slept rough previously.

#### 4. National and regional policy

- 4.1 The Government set a target of increasing housing supply to 300,000 homes a year by 2022 and promised an Accelerated Planning Green Paper in 2019 with proposals to remove planning controls where local authorities fail to meet targets. Since 2010 the amount of government grant for each new social home has been lower, so higher rents must be set to make them viable. Croydon, like most London boroughs, has had to find other ways to fill this gap. The Government allowed more flexibility to fund affordable rented homes, lifted the borrowing cap on the Housing Revenue Account and allowed prudential borrowing, yet the Right to Buy continues to deplete current council stock and threaten the long-term viability of future investment in new council homes. In March 2019 79% of government investment was still devoted to supporting private market or homeownership. The Future Homes Standard, currently under consultation, aims to cut carbon emissions in new homes by almost a third from 2025. This Council is committed to increasing the sustainability of new homes.
- 4.2 Consultation on implementing Hackitt Review recommendations on building regulations and fire safety has concluded. LHA rates fell behind market rents for some years and have been frozen since 2016, making it harder for claimants to rent privately. A green paper proposes resetting the balance of rights and responsibilities between private landlords and tenants.
- 4.3 Government policy on homelessness has increased in priority and prominence in recent years. The Government has allocated £100m to deliver initiatives that will help to stop people becoming homeless in the first place, provide rapid rehousing (including piloting 'Housing First' for entrenched rough sleepers), and

provide support to find work and live independently. The Homelessness Reduction Act 2017 placed new duties on local authorities to intervene at earlier stages to prevent homelessness and provide services to all affected by homelessness, whether or not they are in priority need for housing. Croydon's Gateway approach meant that the Council was prepared to meet this challenge, but the new burdens funding provided by Government is time-limited. There is a lack of consistent funding to support long-term programmes. The national Rough Sleeping Strategy (2018) aims to end rough sleeping entirely by 2027. The extent to which the Government will continue these policies will become clearer after the Queen's Speech, but early indications suggest a greater focus on home ownership rather than affordable housing.

- 4.4 The Mayor's London Housing Strategy aims to address the housing shortage through an intensive use of London's available land, focusing on more genuinely affordable housing and providing help for people feeling the effects of the housing crisis – from private renters to rough sleepers. It has five priorities:
1. building homes for Londoners;
  2. delivering genuinely affordable homes;
  3. high quality homes and inclusive neighbourhoods;
  4. a fairer deal for private renters and leaseholders; and
  5. tackling homelessness and helping rough sleepers.

In support of priority 4, the Mayor has published proposals for reforming tenure and rents in the private rented sector. The Mayor's priorities are reflected in the strategic priorities proposed for Croydon's Housing Strategy.

## 5. Our Priorities

- 5.1 Our priorities come under three headings: to create **New Homes** that local people can afford to rent or buy; ensure existing homes are **Good Quality Homes**; and provide **Better Access to Homes and Independent Living**.

### **New Homes within Great Places**

1. Increase the supply of genuinely affordable homes that Croydon residents can afford to rent or buy
  - Develop an evidence-based approach to planning for a range of housing tenures and types that meet the needs of Croydon residents at rents and prices to suit a range of local incomes
  - Work with the Mayor of London to ensure genuinely affordable homes in new developments through planning policy and bidding for extra development funding
  - Brick by Brick, the Council's wholly-owned housing company, is building 2,000 homes on council land by 2022, selling or renting 50% at market prices creating profits to fund homes for shared ownership, intermediate rent or affordable rent. Thereafter it will build 500 homes a year.
  - Pilot community-led housing on small council-owned sites for resident-led schemes to produce 100% affordable homes
  - Develop plans to build additional new council homes to be let at rents

- that local people can afford.
  - Review options for developing or procuring homes that key workers can afford, and involve partner public sector employers.
2. Plan for new homes within sustainable neighbourhoods, where people want to live, work and socialise
- Work with partners and the community to ensure there is sufficient social and physical infrastructure in each local area to support the new homes and create sustainable places.
  - Subject to consultation, adopt a revised Local Plan in 2022 to take account of the Mayor of London's new, higher target for new homes and affordable housing in Croydon.
  - Ensure that future development contributes fully to minimising carbon dioxide emissions and seek high standards of sustainable design and construction from new development, conversion and refurbishment

### **Good Quality Homes**

3. Improve council homes in estates and neighbourhoods that residents are proud to call their home
- Croydon has 13,475 council homes, including 1,221 sheltered and special sheltered homes. The Council has acquired 254 council homes, to be managed through its charitable partnership Croydon Affordable Homes, and leased 338 homes for homeless households let at LHA rents. In addition, Brick by Brick and the Hub will have completed 412 council homes for affordable rent by 2022. This will bring the total of additional council homes delivered to 998. The Council will:
- Continue to invest in council homes to ensure they comply with safety regulations, are decent and more energy efficient.
  - Create new social/affordable homes by converting or extending existing buildings, replacing them if not cost-effective, and building on infill sites
  - Consider outdated sheltered/special sheltered (extra care) housing for upgrading or conversion into general needs housing. Invest in new older people's housing and extra care homes that meet modern standards.
  - Improve communal spaces, design solutions to anti-social behaviour and fly-tipping, and install full fibre broadband to council homes
  - Involve residents of all ages and backgrounds in shaping our housing services
  - Develop a disposals and acquisitions policy
  - Ensure we achieve value for money and good performance from our contractors.
4. Improve private rented homes
- Some 58,500 homes are rented privately (36% of all dwellings in Croydon). 24% have at least one serious home hazard. The number of private renters is rising as this is an important option for people who cannot afford to buy.
- Advise, train and support landlords, running the regular Landlords' Forum and newsletter, and enforce standards where necessary
  - Following consultation, seek approval from the Secretary of State to renew the selective licensing scheme in 2020 to improve housing conditions in the private rented sector
  - Require owners to seek planning permission from 2020 before

- converting properties into small houses in multiple occupation
  - Support proposals for private rented sector reform including the Mayor of London's blueprint for reforming tenure and rents
- 5. Help with repairs to private homes for those who need it most
  - Continue to provide loans for owner occupiers and grants for private tenants to help fund essential repairs and energy efficiency improvements.
- 6. Bring empty homes back into use
  - Further develop referral arrangements to improve our intelligence and double Council Tax payable for long term empty properties.

### **Better Access to Homes and Independent Living**

7. Make better use of existing social homes
  - Encourage under-occupiers to move to smaller council and housing association homes through grants, practical help and offers of alternative housing that genuinely meets their needs.
  - Research older people's needs to develop suitable homes for people as they age.
  - Review policy on adaptations of under-occupied council homes.
  - Improve processes to speed up the reletting of empty council homes, and better target homes which have existing adaptations to disabled households.
8. Increase the supply of temporary and permanent housing for those without a home
  - Update council temporary accommodation schemes, seek investment and develop a framework to assess opportunities to increase supply
  - Use private investment and receipts from Right to Buy house sales to purchase more new and existing homes for letting at the LHA to low income families, ensuring that they remain affordable and not subject to the Right to Buy by transferring them to charitable limited liability partnerships.
9. Enable people to rent decent homes in the private sector
  - Enable people to rent privately through information and advice, and place more people in private tenancies through Croydon Lettings, the Council's social lettings agency.
  - Publicise to landlords Council accommodation schemes, for example guaranteed rent and support for vulnerable people in rented properties.
  - Offer information, advice, access to training and support to homeowners thinking of letting properties.
10. Enable people to gain and maintain their independence in their home
  - Continue delivering major adaptations across all tenures of property.
  - Continue advising and assisting homeowners and private tenants to keep their homes warm and reduce their fuel bills.
  - Consider investment options to increase the supply of supported housing in Croydon, including the delivery of adaptations and support packages for people in their current homes, in order to progress towards meeting

demand for independent living and moving away from over-provision of residential care.

- Review and update planning policy and design guidance for the development of new wheelchair accessible homes.

#### 11. Prevent and relieve homelessness and end entrenched rough sleeping

- Consult on and adopt a homelessness and rough sleeping prevention strategy for Croydon, the priorities of which are set out under 6 below.
- Embed the council-wide prevention and early intervention 'Gateway' approach with partners in all sectors: negotiation with landlords, tackling illegal eviction, family mediation, as well as wrap-around support to help people to help themselves covering debts, budgeting, maximising income, finding employment and services to tackle food poverty.

## 6. Homelessness and Rough Sleeping Prevention Strategy

6.1 The Council must review, renew and publish a homelessness strategy every five years, as a requirement of the Homelessness Act 2002. Croydon's [Homelessness Review](#) was published in 2018. It provided information about current levels of homelessness in Croydon, and how they might change over the next 5 years, the causes and underlying drivers of homelessness, and the profile of homelessness. To tackle homelessness and rough sleeping effectively requires taking wide-ranging actions, best organised through a strategic partnership approach. Some of the actions required cannot be taken forward at a local authority level, and we will need the support, and additional resources from central Government and the Mayor of London. The Review found that there appears to be little opposition to tackling homelessness judging by the engagement carried out so far. Differences of opinion seem to emerge around: how/whether we should prioritise support; how we enforce around begging/vagrancy; and, how Croydon will continue to support government funded projects once the current funding comes to an end. Following the completion of consultation on the Review in late 2018, the Council now proposes to commence consultation on a draft Homelessness and Rough Sleeping Prevention Strategy, including the key aims as listed at 6.2. This report seeks authority to consult with key partners and external stakeholders, and submit to full Council for adoption.

6.2 The draft Homelessness and Rough Sleeping Prevention Strategy has the following priorities:

6.2.1 **Deliver early intervention services across the borough:** We want more people to know about and use Croydon's public and voluntary sector services to help them avoid crisis. To provide support earlier we need to work in communities, delivering trusted services where they are needed most, based on local evidence and intelligence. We will build coordinated early identification networks and effective referral services linked to existing commissioned preventative services. More services in areas of high need will be delivered with or by community projects. New adult social care customers will benefit from the Council's 'Gateway' service, which responds to a whole household's needs concerning income, employment, skills and training, as well as housing. The aim of this collaborative, holistic approach is to increase resilience and

independence. We will train and share information with commissioned services and voluntary groups providing services to people in need, to build their capacity and improve collaboration.

- 6.2.2 **Prevent homelessness:** We will continue to develop a more proactive, locally delivered, evidence-based prevention service. This will include more effective prevention of the three main causes of homelessness: the loss of private tenancies; exclusion by parents, relatives and friends; and domestic violence. We will promote housing advice and options services; work jointly with public authorities such as prisons, probation and health services; and extend the Gateway approach into more areas of high need through Community Connect/Food Stop projects to ensure that people at risk of homelessness approach the Council for advice as early as possible and understand how we can help them find alternative accommodation.
- 6.2.3 **End entrenched rough sleeping and end core homelessness by 2030.** We will employ an effective 'No First Night Out' approach to tackle rough sleeping early, establishing rapid rehousing pathways from the street and opening a short stay centre to assess complex needs and develop swift person-centred solutions for rough sleepers and individuals at immediate risk of street homelessness. We will extend the Housing First approach to get the most vulnerable people off the streets and into their own home with support. Other actions include joint work with Police and local businesses to arrange support and reduce anti-social behaviour associated with some rough sleepers and sleeping sites. We will relieve homelessness among European Economic Area nationals and other migrants with no access to welfare benefits.
- 6.2.4 **End youth homelessness in Croydon:** This priority covers services for young people aged 16-25 without dependents. It will include improving joint work between housing and children's services on housing and support for young people and care leavers. We will co-design housing advice and information with young people; develop a youth homelessness prevention peer education programme and a young persons 'tenancy ready' programme; and identify young people at risk of tenancy failure through eviction or abandonment. We will develop alternative emergency accommodation for young people and end the use of B&B hotels.
- 6.2.5 **Ensure sufficient housing supply to meet the needs of homeless households:** This priority includes housing strategy actions set out at 5.1 (8) above to provide homes needed to discharge the Council's housing duty and provide housing options for moving on from supported accommodation. It will ensure sufficient supply for specific groups such as over-65s with complex needs and young people; and enable the Council to reduce the use of B&B hotels with shared facilities as emergency accommodation.
- 6.2.6 **Support our residents through localised support services based on local need:** This will include support to enable vulnerable tenants to sustain their tenancies, reviewing the provision of health services for homeless households; and providing opportunities for volunteers to meet need in their local area.
- 6.2.7 **Enter into a collaborative partnership with Crisis to develop and implement a ten year strategy to end core homelessness in Croydon.**

Ending core homelessness means: no one sleeping rough; no one forced to live in transient or dangerous accommodation such as tents or squats; no one living in emergency accommodation such as shelters and hostels without a plan for rapid rehousing into affordable, secure and decent accommodation; no one homeless as a result of leaving a state institution such as prison or the care system; and everyone at immediate risk of homelessness getting the help that prevents it happening. Working with Crisis, the national homelessness charity and campaigning organisation, we will test innovative and effective ways of reducing homelessness and rough-sleeping in the borough, and lobby for further funding and research towards this end.

## **7. Action Plan**

7.1 In line with the three key overarching themes set out above, and following engagement with Cabinet Members, relevant officers and key stakeholders, we have delineated a number of initial workstreams which will ensure progress against the 11 key priorities for Croydon's Housing Strategy. These are not exhaustive, but are the areas of immediate focus underneath the priorities outlined above, in addition to work already underway as described. As part of the action plan, the Council will take the opportunity to review all relevant policies to ensure they are fit for purpose and match the expectations of the strategy.

### **7.2 New Homes in Great Places**

#### **7.2.1 Updated borough-wide housing needs assessment to inform the Local Plan Review**

As noted in the October 2019 Cabinet paper setting out the proposals and timeline for the review of the Croydon Local Plan (2018), a revised Strategic Housing Market Assessment (SHMA) has been produced by GL Hearn for the Council. A working group of relevant officers across the Council are reviewing the SHMA research to ensure that the findings accurately reflect current and projected population trends, and associated housing needs borough-wide. This is prompting proposals for planning policy changes in order to best meet the borough's housing needs, which will be captured in any relevant amendments to the Croydon Local Plan as part of the current Local Plan Review process.

#### **7.2.2 Affordable housing pipeline and engagement with Registered Providers**

Building on the established relationships between Croydon's Spatial Planning team and Registered Providers (RPs), we will develop more regular and streamlined reporting and monitoring of new affordable housing supply/development in the borough, in order to better plan for the new homes being developed for a range of affordable tenures in Croydon. This will include improved engagement with developers and RPs focused on new homes developed for disabled households, in order to better specify for and target these homes at individuals and families with relevant needs.

### **7.2.3 Investment criteria and housing supply briefs for the Council's capital investment in new homes and for partners developing affordable housing in the borough**

Building on the overarching governance route for asset disposals and acquisitions via an Assets Board the Council will develop clear procedural guidance for the consideration of asset/investment opportunities, including viability testing and legal and financial due diligence. Most importantly this will enable the Council to prioritise options for asset investment, procurement or development as assessed against agreed strategic objectives for planning and housing supply.

Informed by the SHMA and broader review of housing needs in the borough, we will develop a series of housing supply briefs for different types of housing, (e.g. extra care) in order to inform investment decisions, embed good design quality and ensure operational efficiency.

In particular, we will develop a proposal for a programme of investment into new homes for supported living for adults with learning and physical disabilities, as existing analysis of projected needs and supply indicates a requirement for 35 new units (including rooms in shared properties with shared communal facilities) a year for this cohort up to 2025. As noted above, we will set out how we can move closer to the national best practice ratio of 25:75% for residential care : supported living for individuals with disabilities. By investing directly in the provision of new homes for supported living, the Council would be able to recover the Supported Exempt Accommodation costs that are currently paid to landlords that are not registered providers to top up Housing Benefit to cover extra expenses for supported living. The Council would also encourage non-registered providers to register so that Supported Exempt Accommodation costs can be recovered this way also.

## **7.3 Good Quality Homes**

### **7.3.1 Encouraging downsizing**

Developing on previous research and policy development work undertaken by Croydon's housing solutions team, we will undertake a research and engagement project to capture any potential improvements to the Council's approach to households significantly under-occupying family homes, both in our own council homes and in the private sector. We need to strike an appropriate balance between helping our residents stay settled in neighbourhoods where they have local community links and support networks, whilst releasing family homes for occupation by larger households. This work may further inform the development of relevant housing supply briefs as set out in 7.2.3 above.

### **7.3.2 Accessible homes policy review**

As part of the housing needs analysis summarised above, and aligned to the Local Plan Review process, we will analyse the existing 'waiting list' for wheelchair accessible and adapted homes on the Council's housing register. This will inform potential amendments to planning policy in relation to wheelchair design and specification requirements, and tenure mix as part of new developments. We will also work with developers and RPs to agree a wheelchair allocations and lettings protocol for new accessible and adapted



homes, so that these are appropriately fitted out for the specific needs of such households, and the process of letting is as streamlined as possible.

#### **7.4 Better Access to Homes and Independent Living**

##### **7.4.1 Housing and income dashboard and a borough-wide housing supply review**

We are developing a dashboard to better map our current general needs housing register and homelessness applications against allocations and lettings activities, and monitor income for the Council's housing stock. In parallel, the Council has commissioned a strategic review of the private rented sector and the Council's emergency and temporary accommodation portfolio assessing exposure, risk and opportunity against demand and market profile. This will drive proposals for future investment, incentives and/or partnerships with private providers in order to best meet our need for emergency and temporary housing.

### **8 CONSULTATION**

#### **8.1 Previous consultation on Homelessness Review**

The draft Homelessness and Rough Sleeping Prevention Strategy is being developed following significant input from community organisations, homelessness charities and housing providers in the borough, amongst other contributors. The Homelessness Review document was made available on the Council's website for 3 months, and relevant organisations and partners were invited to review and provide feedback. The document was also available for review by the general public.

#### **8.2 Future consultation on the draft Homelessness and Rough Sleeping Prevention Strategy**

The Council proposes to publish the draft Homelessness and Rough Sleeping Prevention Strategy for comment and feedback on our website for 6 weeks prior to final review and publication. During this period key local and national stakeholders will be invited to review and comment on the draft document, and where appropriate changes will be made to improve the strategy. Focus groups are planned with local housing providers and charities working with homeless households and rough sleepers, to ensure that the views of our key partners are reflected in the final strategy.

#### **8.3 Future consultation on Housing Strategic Priorities and Action Plan**

The Council will publish a more detailed version of the strategic priorities for housing, and the accompanying action plan (including relevant case studies and links) on our website for review and comment over a 12 week period. Individual workstreams set out as part of the Action Plan will require more detailed and specific engagement and consultation with relevant stakeholders and organisations, and communications and engagement plans will be prepared for approval by the Cabinet Member for Homes and Gateway

Services prior to commencement. For example on the workstream relating to the design and letting of homes for wheelchair users, we would anticipate engaging with local organisations such as the Disability Croydon, alongside local NHS partners, housing associations and housing developers.

#### **8.4 Scrutiny and Overview Committee**

The Scrutiny and Overview Committee will review and scrutinise the draft Housing Strategy and the draft Homelessness and Rough Sleeping Strategy. The Committee's recommendations will inform the completion of the strategies before the Cabinet Member for Homes and Gateway Services recommends the updated strategies to full Council for adoption.

### **9 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

#### **9.1 Revenue and Capital consequences of report recommendations**

There are no direct financial implications arising from the recommendations in this report. As the proposals are developed, any requiring capital investment or with implications for the Council's revenue budgets will need to be reviewed and approved via the appropriate approval route ahead of implementation.

#### **9.2 The effect of the decision**

The decision to agree the strategies has no direct financial impact for the Council. The implementation of the strategies will have financial implications and these will have to be reviewed and approved to ensure the funding is available.

#### **9.3 Risks**

There is no risk associated with the development of the strategies. There could be a risk about affordability to deliver but at this stage this is unknown.

#### **9.4 Options**

None.

#### **9.5 Future savings/efficiencies**

At this stage these are unknown.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk (S151 Officer)

### **10. LEGAL CONSIDERATIONS**

10.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that under the Homelessness Act 2002 as amended, all housing authorities must have in place a homelessness strategy based on a review of all forms of homelessness within their district. Failure to produce an up-to-date strategy will leave the Council open to legal challenge.

10.2 In relation to the Housing Strategy and Action Plan beyond the statutory and national policy context set out within the report there are no specific legal considerations to note at this stage. Any specific proposals set out in the

proposed Housing Strategy and Action Plan will need to be the subject of a separate authorisation process upon which advice can be given at the time.

- 10.3 As a public authority, the Council must always take account of the provisions of the Human Rights Act 1998 and not act in a way which is incompatible with a Convention right. Under Article 8, any interference with the right to respect for a person's private and family life and home must be proportionate and Article 14 requires that there must be no unjustified discrimination within the scope of human rights on any grounds, such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.
- 10.4 In discharging its functions the Council must also have due regard to the Public Sector Equality Duty (PSED) in Section 149 of the Equality Act 2010.
- 10.5 Section 149(1) provides that, in exercising its functions, a public authority must have due regard to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act;
  - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.6 The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 10.7 Section 149(3) provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
  - c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

## **11. HUMAN RESOURCES IMPACT**

- 11.1 There are no direct human resources impacts arising from the recommendations of this report.

Approved by: Sue Moorman, Director of Human Resources

## 12. EQUALITIES IMPACT

- 12.1 An Equality Analysis has been carried out to ascertain the impact of the proposed change on groups that share a protected characteristic. The key findings were that there is no potential negative impact on protected groups. Maintaining sufficient supply of housing for the borough and improving the standards of existing homes will have a greater impact on the most vulnerable members of Croydon's communities, who are generally less able to afford higher quality, more secure housing. We are proposing specific improvements targets at sectors of our population covered by 'protected characteristics', in particular older people and residents with physical or learning disabilities. Opportunities to advance equality have been taken, so no change to the strategy priorities and initial action plan is suggested. The Equality Analysis will be reviewed alongside the strategy action plan to examine outcome of actions listed in section 12.4 below.
- 12.2 In developing the strategic priorities for a future housing strategy, regard has been had to the Council's Corporate Plan and its equality objectives contained in the Opportunity and Fairness Plan 2016-20.
- 12.3 The Council's equality objectives, adopted at Cabinet in April 2016, were developed on the basis of the findings of Croydon's Opportunity and Fairness Commission which provide a qualitative evidence base relating to the equality and inclusion issues in Croydon. Equality analysis of geographic inequality and that related to people who share a protected characteristic and those who do not is embedded in the Borough Profile that was published by the Council in December 2018. The equality objectives are:
- To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market
  - To increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women
  - To reduce the rate of child poverty especially in the six most deprived wards
  - To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2 including those living in six most deprived wards
  - To increase the percentage of domestic violence sanctions
  - To increase the reporting and detection of the child sexual offences monitored
  - To reduce the number of young people who enter the youth justice system
  - To reduce social isolation among disabled people and older people
  - Improve the proportion of people from different backgrounds who get on well together
  - To reduce differences in life expectancy between communities

### **The equality profile of homelessness**

- 12.4 Homelessness is most likely to affect those individuals and families that are in low paid, insecure employment, or are out of work, or who struggle to secure employment due to caring/parental responsibilities. It also affects those whose vulnerabilities make it more difficult for them to provide for themselves including market employment and housing. The key points are:

- **Gender:** More than 6 out of ten of homeless applicants are single women or many of whom are single parents
- **Children:** More than 8 out of ten households applying as homeless have dependent children.
- **Age:** Homeless households tend to be younger than the general population, with more than half of applicants being aged between 25 and 44.
- **Ethnicity:** Black households tend to be overrepresented among homeless households. In Croydon, 46% of homeless households are of Black ethnic background (compared to 20.2% of the general population on census day 2011).
- **Rough sleepers gender/ age:** Rough sleepers tend to be male (more than 7 out of 10), but younger than the general population.
- **Additional needs:** Most rough sleepers (6 out of 10) have additional needs (including substance misuse or mental health problems).
- **Institutional history:** More than half of rough sleepers have an institutional history, having spent time in care, prison or in the armed forces.

### **Housing strategy priorities and equality**

- 12.5 A number of housing strategy priorities and workstreams will have a positive impact on aims of the Equality Act and address the Council's equality objectives and are set out below:

#### **Age**

The Council intends to develop proposals for investment in and procurement of housing both for older people (including sheltered housing and extra care) and young people leaving Care. Our focus on increasing the supply of new homes for affordable temporary and settled accommodation will also have a positive impact on the lives of children currently living in poor or inappropriate housing, waiting for a new home.

#### **Disability.**

The strategy proposes a number of activities that would have a positive impact on the lives of people with disabilities living in Croydon:

- Investment into extra care and supported living to enable people with learning or physical disabilities to live independently, reducing our proportion of placements into residential care
- Potential amendment of planning policy to increase the proportion of new build affordable wheelchair accessible/adapted homes
- improved engagement with developers and RPs focused on new homes developed for disabled households, in order to better specify for and target these homes at individuals and families with relevant needs
- Continuation of the existing funding and support for adaptations to homes for residents with disabilities living in the private sector and in Council properties

#### **Gender**

Although there are no proposals within the draft Housing Strategy which are gender specific, it is noted that increasing the housing supply in Croydon, particularly of affordable temporary and permanent housing for homeless households and those on our Council housing register would positively impact

households headed by a single female applicant, who are the majority of homeless applicants in Croydon (over 60% in 2017-18).

The Homelessness and Rough Sleeping Prevention Strategy, which forms part of this work, will also focus partly on targeted housing and support for female rough sleepers, as Croydon has the highest percentage of female rough sleepers amongst our statistical outer borough neighbours.

#### **Religion and belief.**

The strategy does not specify any proposals or policy changes in relation to religion or belief, although a series of 'housing supply briefs' will be developed which may reference the inclusion of design guidance relevant to particular faith communities.

#### **Race**

Although there are no proposals within the main Housing Strategy which are specific to particular ethnic groups, it is noted that increasing the housing supply in Croydon, particularly of affordable temporary and permanent housing for homeless households and those on our Council housing register would positively impact BME households who are the majority of homeless applicants in Croydon (over 60% in 2017-18).

As noted above, the development of 'housing supply briefs' may reference the inclusion of design guidance relevant to particular ethnic groups.

#### **Pregnancy and maternity.**

The strategy does not specify any proposals or policy changes in relation to pregnancy or maternity, although as noted above increasing the supply of affordable housing and temporary housing for homeless households would disproportionately affect the majority of applicants who are lone parents (overwhelmingly women).

Approved by: Yvonne Okiyo, Equalities Manager

### **13. ENVIRONMENTAL IMPACT**

- 13.1 The priorities and actions set out in this report have a limited positive direct environmental impact. Specifically the priorities and proposals relating to increasing the supply of new housing and improvements and adaptations to existing housing stock (both the Council's own housing and financial support for changes to private housing) would have a positive environmental impact. This would include the development of new sustainable, energy efficient homes, and making environmental improvements to existing housing.

### **14. CRIME AND DISORDER REDUCTION IMPACT**

- 14.1 The priorities and actions set out in this report have no direct implications for the reduction/prevention of crime and disorder.

## **15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 15.1 The report seeks delegated authority for the Cabinet Member for Homes and Gateway Services to approve the publication of final versions of the Housing Strategy and Homelessness and Rough Sleeping Prevention Strategy in order to set the Council's approach to housing in all its forms and the prevention of homelessness.

## **16. OPTIONS CONSIDERED AND REJECTED**

- 16.1 As stated above, there is no current housing strategy for Croydon, and it was considered that the borough could continue without this strategic direction for housing. However, given the significant current and varied housing need in Croydon, as summarized above, and the need to coordinate a number of existing and emerging workstreams to ensure sufficient housing supply, range and quality for our residents, it was deemed appropriate to develop a new housing strategy.
- 16.2 As noted above, the publication of a homelessness strategy is a statutory requirement as set out by the Homelessness Act 2002.

## **17. DATA PROTECTION IMPLICATIONS**

### **17.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

### **17.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

The Director of Housing Assessment and Solutions comments that a DIA was not completed as no personal data was used to prepare the Strategy. Detailed anonymised data from the Council's housing register and other sources may be used to progress the actions under the strategy, and DPIAs will be completed for individual projects as they are scoped and progressed.

Approved by: Yvonne Murray on behalf of the Director of Housing Assessment and Solutions

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### **CONTACT OFFICER:**

Caroline Toogood Head of Strategic Projects  
(Growth and Housing) Ext. 63837  
John Montes, Senior Strategy Officer, Ext.  
61613

### **APPENDICES TO THIS REPORT:**

None

### **BACKGROUND PAPERS:**

None

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<b>REPORT TO:</b>	<b>CABINET 21<sup>st</sup> October 2019</b>
<b>SUBJECT:</b>	<b>Consultation on proposals to renew a private sector housing Selective Licensing Scheme in Croydon</b>
<b>LEAD OFFICER:</b>	<b>Shifa Mustafa, Executive Director – Place Steve Iles, Director Public Realm – Place</b>
<b>CABINET MEMBER:</b>	<b>Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes and Gateway Services</b>
<b>WARDS:</b>	<b>All</b>

**CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON**

This report builds on commitments in the Council’s Corporate Plan (2018), reflecting on the Council’s approach to the private rented sector and setting out the case for a renewal of selective licensing to meet the following key ambitions:

- *‘Good, decent and safe homes, affordable for all’*
  - Important themes are *quality homes* and *homes for everyone*. Croydon’s selective licensing scheme was introduced to ensure everyone in the borough has access to decent, safe housing. We want to ensure that all residents, regardless of tenure, feel they are protected, treated fairly, and can stay in their homes once they are in them.
- *‘A cleaner, greener Croydon’*
  - Croydon’s *Don’t Mess With Croydon, Take Pride* campaign is important for setting out our ambitions for raising environmental standards and improving the living environment across the borough.
- *‘One borough – many places’*
  - Some parts of Croydon have persistent or difficult issues to address. We want to provide targeted responses to the range of issues across our multifaceted borough.

**FINANCIAL IMPACT**

The financial impact should be cost neutral as the cost of administering the scheme is covered by charging licence fees to landlords. More details on the current and proposed fee structure are outlined in the appendices below.

**FORWARD PLAN KEY DECISION REFERENCE NO.: 2119CAB**

This is a Key Decision as defined in the council’s constitution. The decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee by the requisite number of councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below.

## **1. RECOMMENDATIONS**

The Cabinet is recommended to

- 1.1 Authorise the Executive Director of Place to commence statutory consultation and engagement with key stakeholders on proposals to introduce a new Selective Licensing Scheme in Croydon in 2020;
- 1.2 Authorise the Executive Director Place to recommend an approach to renewal or otherwise of selective licensing in Croydon, based on the evidence presented and feedback from the consultation process;
- 1.3 Delegate authority to the Cabinet Member for Homes and Gateway Services in consultation with the Executive Director of Place to make the final decision on the form of the Selective Licensing Scheme; and
- 1.4 Authorise the Executive Director of Place to seek designation approval from the Secretary of State in 2020, where necessary.

## **2. EXECUTIVE SUMMARY**

- 2.1 Everyone needs a decent, safe and secure home – it is the foundation of a good life. Croydon is a growing borough, yet the new education, employment and leisure opportunities available as part of that growth are not matched by provision of good quality housing that our residents can feel safe and secure in. The private rented sector has grown in Croydon to the extent that it represents more than 35% of housing in the borough. We are determined to do everything required so that all in Croydon, regardless of tenure, have the chance of a decent, safe and secure home and good living environment.
- 2.2 This report presents evidence of poor housing conditions, deprivation, crime, anti-social behavior (ASB) and environmental nuisance linked to the private rented sector (PRS) in Croydon and sets out the process for renewing the selective licensing scheme covering private rented properties in Croydon.
- 2.3 The selective licensing scheme currently in operation in Croydon (CPRPL) began in October 2015 and is due to expire in September 2020. Selective Licensing is provided under the Housing Act 2004 (Part 3). Under new legislation introduced in 2015, local authorities are required to obtain confirmation from the Secretary of State for any selective licensing scheme which would cover more than 20% of their geographical area or would affect more than 20% of privately rented homes in the local authority area.
- 2.4 We seek a decision from Cabinet to carry out consultation with the tenants, landlords, residents and businesses that would be affected by a renewal of selective licensing in Croydon. Introducing selective licensing alongside existing mandatory licensing of houses in multiple occupation (HMOs) would mean all privately rented accommodation in certain or all areas of the borough (dependent upon the final outcome of the consultation and subsequent application to the Secretary of State) would be required to be licensed for a period of up to five years.

2.5 The report seeks delegated authority for the Executive Director Place with the Cabinet Member for Homes and Gateway Services to approve the approach to the Secretary of State for a new selective licensing designation in Croydon in 2020. The recommendations it sets out do not have any direct impact on the council's financial planning and budget strategy. Any proposals with implications for the council's revenue budgets will be considered under the existing financial regulations and brought for Cabinet approval if required by the scheme of financial delegation.

### **3. The private rented sector and selective licensing in Croydon**

3.1 Croydon has the highest number of private rented properties of any borough in London, and likely more private renters than any borough in England. New research has found there are around 58,585 private rented properties in Croydon equating to 35.6% of the borough's total housing stock (Metastreet, 2019). By contrast, the social rented sector (including council properties and registered providers such as housing associations) represents 15% of the borough's housing stock.

3.2 Private renters in Croydon face similar challenges to those in other London boroughs. In London, many families in the private rented sector (PRS) are suffering acute stress in that a substantial proportion of their income goes on rent leaving little else for other living costs (Trust for London Poverty Profile, 2018). This financial stress is often exacerbated by poor housing conditions, insecurity of tenure and environmental problems (Rugg and Rhodes, 2018).

3.3 In England, the social rented sector is subject to comprehensive regulatory regimes which actively promote the interests of tenants and ensure that social landlords take a proactive approach to addressing their tenants' needs. Social landlords tend to maintain their properties to a higher standard than required by the Housing Act 2004 and are responsible for dealing with other issues such as ASB and waste management problems such as fly tipping.

3.4 In contrast, there is no similar regime to regulate the private rented sector. Local authorities can take statutory action when problems arise. However, the council can only intervene after the event and nearly always because a tenant complains. However, tenants are often too frightened to complain for fear of retaliatory or "revenge" eviction. Research from Citizens Advice (2018) found that private renters in England who formally complain about issues such as damp and mould in their home have an almost one-in-two (46%) chance of being issued an eviction notice within 6 months.

3.5 Selective Licensing allows local authorities to adopt a much more proactive approach to raising housing standards as licensing conditions are primarily aimed at good practice to prevent problems arising.

3.6 Croydon's current selective licensing scheme (CPRPL) began in October 2015 and will expire on 30<sup>th</sup> September 2020. In encouraging landlords to meet their responsibilities through proactive engagement, licensing inspections and monitoring and enforcement work, it is hoped that we can make the borough a better place to live and work for all residents.

3.7 In Croydon, the proactive approach enabled by CPRPL has allowed more than 11,105 licensed dwellings to be inspected (as of August 2019). More detail on the impact of CPRPL is below.

- 3.8 Since Croydon's current selective licensing scheme (CPRPL) began in 2015 there have been numerous developments the most significant of which are:
- Increased levels of financial hardship for private tenants – rents have risen while benefits have been frozen.
  - The number of new rental units in the borough continues to increase both by conversion and new developments.
  - While the level of private renting continues to increase in Croydon, it is reducing or static in neighbouring authorities.
  - The Grenfell fire emphasised the increased need for fire safety in residential properties.

#### **4. National policy and selective licensing**

- 4.1 The private rented sector has doubled in size since 2002 and now houses 19% of households in England (English Housing Survey, 2017-18). Alongside the growth of the private rented sector, some local authorities noted an increase in the prevalence of problems such as anti-social behaviour, poor property conditions, low housing demand and elevated levels of crime, deprivation and migration in areas containing high concentrations of privately rented properties.
- 4.2 The Housing Act 2004 introduced selective licensing to give local authorities an additional tool to tackle problems associated with private renting. Part 3 of the Housing Act 2004 gave local authorities the power to designate areas of selective licensing to help tackle anti-social behaviour and low housing demand. In 2015, the conditions for designation were expanded to include poor property conditions, high crime, high levels of deprivation and high migration.
- 4.3 Under new legislation introduced in 2015, local authorities are required to obtain confirmation from the Secretary of State for any selective licensing scheme which would cover more than 20% of their geographical area or would affect more than 20% of privately rented homes in the local authority area.
- 4.4 The current Guidance on Selective Licensing sets out the statutory criteria for making a designation. Local authorities can designate an area for selective licensing for five years, but must first demonstrate the evidence for their concerns, look at alternative approaches and consult widely.
- 4.5 The application process for selective licensing designation is complex and rigorous and approval is not guaranteed. Approval is subject to recommendation from the Ministry of Housing Communities and Local Government (MHCLG) and is at the discretion of the Secretary of State.
- 4.6 Licences contain conditions with which the applicant must comply over the life of the property licence. Local authorities inspect properties in the area and enforce compliance with the conditions of the licence. The licence requires payment of a fee, part A due at the point of application which covers processing of the application and part B due at point of issue which supports the associated enforcement scheme.
- 4.7 Subject to limited exemptions, a valid licence must be held by the appropriate responsible person in respect of all privately rented properties in such a designated area, typically the landlord or managing agent.

- 4.8 In Spring 2019 the Government published an Independent Review of the Use and Effectiveness of Landlord Licensing. The research indicates that selective licensing can be an effective tool with many schemes achieving demonstrable positive outcomes, and that schemes appear to be more successful as part of wider housing initiative. In brief, the review found that licensing focuses resources; provides clearly defined offences; helps bring other problems to light through proactive inspections; provides a clear means through which local authorities engage landlords; and enables intelligence gathering and promotion of joint working within the authority and other agencies.

## **5. Early assessment of CPRPL 2015-2020 and adapting to challenges**

- 5.1 As of August 2019, CPRPL 2015-2020 has produced the following results:
- 35,500 licences issued.
  - 11,105 inspections of licensed properties carried out. These inspections produced the following results:
    - Satisfactory outcome – 8,010 – 72%
    - Minor breaking of selective licensing conditions – 1,980 – 18%
    - Enforcement action – 1,115 – 10%
  - 806 Improvement Notices (formal and informal) served under Section 11 or Section 12 of the Housing Act 2004 – 49% (391) of which have been complied with. Many notices are in abeyance awaiting the outcome of legal proceedings and sales.
  - 33 Financial Penalties and Prosecutions issued.
  - 51 Prohibition Orders served over a three year period 2016-2018. 15 Prohibition Orders in the first six months of 2019. This compares to 18 Prohibition Orders served over three years prior to the scheme 2012-14.
  - Many multi-agency projects (completed, ongoing and planned).
  - Extensive engagement with landlords via an accreditation scheme, landlord forums and regular newsletters sent to 19,236 licence holders.

## **5.2 Reactive and proactive enforcement**

- 5.2.1 CPRPL effectively includes two enforcement regimes: a reactive service which responds to requests from the public and the proactive inspection of licensed properties. The reactive service is heavily influenced by tenants and generally arises from a tenant complaint. The early stages of CPRPL involved significant proactive work to inspect licensed properties. Landlords engaged with through the proactive inspection of licensed properties tend to be more committed and their properties in less need of substantial works.

- 5.2.2 The enforcement team are developing policy and process to tackle rogue landlords via improved data sharing within the Council such as debt recovery, and with relevant external agencies including London Fire Brigade, the Metropolitan Police, the Greater London Authority (Rogue Landlord and Agent Checker) and the rogue landlord's database administered by MHCLG.

## **5.3 Unlicensed properties**

- 5.3.1 The Council allows members of the public to report an unlicensed property using an on-line reporting tool. In the 12 months to 31<sup>st</sup> August 2019 the Council received 215 referrals. Following investigation it was found that 144 referrals were unlicensed (67%). By contacting the owner, 81 of these properties were quickly licensed (56%) and the remainder were passed onto the enforcement team to commence enforcement.

- 5.3.2 As of August 2019, there are thought to be up to 10,000 unlicensed properties in Croydon, after licence exemptions have been taken into account such as properties used for temporary or emergency accommodation. See Appendix 1.
- 5.3.3. Metastreet have provided the housing standards team with 'tenure intelligence' on the extent of the private rented sector in Croydon at individual property level. This newly available data means that Council officers now have a list of residential properties likely to be unlicensed. In the remaining 12 months of CPRPL these properties will be targeted for enforcement action. Further details of the Metastreet findings, undertaken in August 2019, are provided below.
- 5.4 Multi-agency working**
- 5.4.1 Funding cuts to public services in the face of rising demand present formidable challenges for all council services. One of the key benefits of a selective licensing scheme is that it facilitates joint-working across service boundaries.
- 5.4.2 Many of the most vulnerable tenants face multiple problems which may include poor housing conditions and living environment, fuel poverty, problems accessing public services, or the anti-social behaviour of a neighbouring tenant. The object of selective licensing is to ensure that landlords are professional and take responsibility for dealing with problems which focus on or emanate from their properties.
- 5.4.3 Private rented properties are increasingly used for unlawful purposes such as for growing or smoking cannabis, or housing illegal immigrants who are often employed in conditions of near slavery. Selective licensing provides for the Council to take a lead in bringing together other appropriate agencies to take a holistic approach to all the problems which may be present at a single address.
- 5.5 Fire hazards in residential properties**
- 5.5.1 Two years after the Grenfell tragedy in June 2017, fire continues to be a serious threat to the safety of the residents of blocks of flats. This is particularly the case with tall buildings (defined as being at least 18 metres high). Apart from construction methods and building materials a key concern is the evacuation procedure in the event of fire.
- 5.5.2 In September 2019 alone there were at least four serious fires which engulfed or destroyed blocks of flats (Worcester Park 9<sup>th</sup>, Brighton 21<sup>st</sup>, Clapton 17<sup>th</sup>, Gidea Park 20<sup>th</sup>). Fortunately, nobody was killed in these fires.
- 5.5.3 Croydon has a relatively large number of tall buildings concentrated in Fairfield ward. There are 41 tall residential buildings across Croydon of which 28 are in Fairfield. Fairfield also contains the highest concentration of private rented housing of anywhere in the borough - more than half of all dwellings the ward are privately rented, equating to 4,792 dwellings. The vast majority of the residential flats in tall buildings in Croydon are private rented.
- 5.5.4 As now widely known, the Grenfell fire was particularly devastating due to highly flammable external cladding. At present we can't be sure of the extent of flammable cladding used in privately owned blocks in Croydon.
- 5.5.5 The responsibility for conducting checks on cladding falls upon the Council rather than the Fire Brigade due to a legislative anomaly which gives different definitions for 'common parts' in the Regulatory Reform (Fire Safety) Order 2005 and the Housing Act 2004.

Moreover, the Housing Health and Safety Rating System (HHSRS) used to assess the safety of existing housing can override Building Regulations. If a tall building has been constructed using materials or methods which are combustible this can only be dealt with by the Council assessing the risk and taking appropriate enforcement action.

- 5.5.6 In July 2019, The Ministry of Housing, Communities and Local Government (MHCLG) asked all local authorities to complete a data collection exercise to identify external wall materials and insulation on all high-rise residential buildings 18 metres and over within their area. This data collection exercise is intended to be carried out under the aegis of the Housing Act 2004 using the HHSRS. Alongside this, additional guidance on how to use the HHSRS in high rise buildings has been recently published.
- 5.5.7 In Croydon the new requirement to undertake an assessment of external materials and insulation in tall buildings will mean a significant increase in Council Officers workload. All existing tall buildings must be checked in line with the additional HHSRS guidance. Selective licensing is essential to ensuring public safety, particularly in Fairfield ward; it will ensure that licensing and enforcement officers are properly resourced to carry out the data collection requested by MHCLG and checks in line with additional statutory guidance.
- 5.5.8 For purpose-built flats the authority responsible for the building as a whole is the London Fire Brigade. However, for individual flats the responsibility lies with the Council. The proposed selective licensing conditions state it is incumbent on landlords to ensure a safe environment for tenants including fire prevention, detection and escape. Selective licensing also places a duty on landlords to inform their tenants of evacuation procedures – which may vary from building to building and from floor to floor – and to ensure that freeholders and/or managing agents are fulfilling their duties in respect of fire safety. Given the transience of the private rented sector and the large numbers of flats which are rented out, often to vulnerable families, selective licensing is vital to ensuring that all residents are properly protected and informed, regardless of tenure.

## 5.6 Case studies

### 5.6.1 London Road, Norbury

Following intelligence from a neighbour that there were breaches of licensing conditions in a flat over a shop, a warrant was obtained from the magistrate's court for an unannounced entry. In the early morning Council officers entered the building via the open front door. 13 people were found to be living there in 5 rooms. One room was occupied by four adults (a couple and two women). Another was occupied by the legal tenant, his wife and teenage son and another was occupied by adult twin brother and sister and her baby. There was no door to the only kitchen which was a severe fire hazard. There was only one WC and bath. The owner denied all knowledge of the sub-letting but officers still inspected all properties believed to be associated with the owner and his companies. No further serious breaches were found.

### 5.6.2 Cannabis Factories

During the first half of 2019 police dealt with 25 cannabis factories, nearly all of which were privately rented properties (eight were licensed). Council officers have visited all the properties concerned. All have since been (or are about to be) renovated. The cannabis growing has stopped and the landlords all deny any knowledge of the activities.

This project is ongoing and selective licensing officers are working with the police on a more routine basis which involves sharing intelligence and joint visits. This applies not just to the cannabis factories but to all illegal activities such as prostitution and anti-social behaviour.

### 5.6.3 London Road, Broad Green

First floor one bedroom flat occupied by a couple in the living room and three adults who shared the bedroom. It seems reasonable to believe that the managing agent was fully aware of the situation here, i.e. an illegal house in multiple occupation. A joint inspection programme for other associated properties is currently being arranged.

## 6. Building knowledge of the private rented sector and licensing in Croydon

### Phase 1 - Rogue Landlords Enforcement Grant Initiative

6.1 The opportunity for increasing knowledge of the problems facing the private rented sector in Croydon provided by the Selective Licensing Scheme enabled the carrying out of a review of housing conditions under Section 3(1) of the Housing Act 2004.

6.1.2 Inspection programmes were devised and carried out between August 2018 and June 2019. During that time, in addition to dealing with routine complaints and enquiries, the Selective Licensing Inspection Team targeted specific geographical areas around the borough. This work was intensified as a result of funding from MCHLG as part of the Rogue Landlords Enforcement Grant initiative. This work has been detailed in Appendix 2 but is summarised below.

6.1.3 The most significant findings from this work were:

- The large number of families with children who were living in relatively crowded conditions because appropriately sized housing was unaffordable
- Many tenants were worried about reporting problems to their landlord for fear of retaliatory eviction
- Large numbers of unreported hazards as defined by the Housing Act 2004
- Reportedly significant numbers of landlords operating “below the radar”
- Where there are housing issues there are usually a complex of needs e.g. landlord behaviour, lack of licence, ASB as victim or perpetrator, waste management and crowding.
- Complex needs call for a multi-agency approach
- Boundaries between the agencies should be treated as blurred but still identify clear roles for any given situation
- Rogue landlords are outnumbered by incompetent amateur landlords who are often more difficult to deal with as they receive the “benefit of the doubt” for enforcement purposes. This means that it takes longer to resolve problems because formal action is deferred until it is certain that the landlord understands the situation. Also, consider the role of individual leaseholder landlords of high-rise flats.

6.1.4 The review of housing conditions produced two overarching conclusions:

- A reshaped enforcement regime is needed.
- Improving landlord professionalism must be at the heart of selective licensing schemes.



## Phase 2 – Metastreet

6.2 In August 2019 a company was engaged to model and analyse relevant Council data together with publicly available statistics using methodologies which have been accepted by the Government in local authority submissions for selective licensing designation. Metastreet used machine learning to differentiate between properties that are private rented, owner occupied or social rented and generate a number of other insights into private renting in Croydon. The data also reinforced the findings of the Phase 1 fieldwork.

6.2.1 More detail is provided in Appendix 1, but key findings from Metastreet include:

- 35.6% of the total housing stock in Croydon is private rented.
- In 22 wards more than 19% of the total housing stock is private rented (or above the national average of 19%).
- In 6 wards less than 19% of the total housing stock is private rented. These wards are: Kenley, Selsdon & Addington Village, Sanderstead, Shirley South and Old Coulsdon, New Addington North.
- Across the borough, more than 23% of private rented dwellings have at least one serious home hazard (or above the national average for Category 1 hazards of 14%).

6.2.2 The data generated by Metastreet will be used to support enforcement work across the Council and help prevent crime and fraud, such as failure to licence and council tax evasion.

## 7. Qualifying conditions and process for selective licensing designation

7.1 The process of evidence gathering and consultation prior to designation is rigorous and challenging. Where the proposed designation covers either 20% of the total geographic area of the authority or 20% of the total privately rented stock. The designation requires approval by the Secretary of State.

7.2 Section 80(6) of the Housing Act 2004 provides that a local authority may designate an area for Selective Licensing if:-

- the area is experiencing a significant and persistent problem caused by anti-social behaviour;
- some or all of the private sector landlords who have let premises in the area (whether under leases or licences) are failing to take action to combat the problem that it would be appropriate for them to take; and
- making a designation will, when combined with other measures by the local housing authority, or by other persons together with the local housing authority, lead to a reduction in, or the elimination of, the problem.

7.3 The Selective Licensing of Houses (Additional Conditions) (England) Order 2015 provide four additional criteria and must be read alongside Government Guidance. For these conditions to apply the Guidance requires that the level of PRS housing should be above the national average (19%):

- poor property conditions
  - This condition is met if, following a review of housing conditions under section 3(1) of the Housing Act 2004, the authority considers a significant number of properties in the private rented sector need to be inspected in order to determine whether any of those properties contain category 1 or 2 hazards. The Selective Licensing Scheme must be part of a wider strategy to tackle housing conditions, so that enforcement action under Part 1 of the Act can be prioritised, whilst ensuring through licence

conditions under Part 3 that the properties are properly managed to prevent further deterioration. In this context “significant” means more than a small number, although it does not have to be a majority of the private rented stock.

- high levels of migration
  - the Guidance states that a population increase of around 15% or more over a 12 month period would be indicative that the area has or is experiencing a high level of migration into it.
- high level of deprivation
  - When an area has a high level of deprivation when compared to other similar neighbourhoods in the local authority area or within the region.
- high levels of crime
  - The Guidance suggests that to meet this condition the area has displayed a noticeable increase in crime over a relatively short period, such as in the previous 12 months or the crime rate in the area is significantly higher than in other parts of the local authority area or that the crime rate is higher than the national average.

7.4 In addition to proving the existence of one or more of the above criteria, it must also be shown how existing measures alone are not sufficient to tackle the underlying housing problems of a specific area. The Guidance states that selective licensing is not a tool that can be used in isolation. The designation should be part of the overall strategic borough wide approach, complementing existing policies on:

- Homelessness
- Empty Homes
- Regeneration
- Anti-social behaviour associated with privately renting tenants

## **8. Selective licensing as part of wider housing strategy in Croydon**

8.1 The Council’s draft housing strategy priorities come under three headings: to create *New Homes* for sale and for rent for local people, ensure existing homes are *Quality Homes*, and provide opportunities for *Homes for Everybody*.

8.2 The proposal for a renewal of selective licensing in Croydon forms a key part of the *Quality Homes* aspect of the Housing Strategy, as outlined below:

### **1. Improve private rented homes**

Some 58,500 homes are rented privately (36% of all dwellings in Croydon). The number is rising as this is an important option for people who cannot afford to buy.

- Advise and train landlords and enforce standards where necessary
- Following consultation, seek approval from the Secretary of State to renew the selective licensing scheme in 2020 to improve housing conditions in the private rented sector
- Require owners to seek planning permission from 2020 before converting properties into small houses in multiple occupation
- Support proposals for private rented sector reform including the Mayor of London’s blueprint for reforming tenure and rents

### **2. Help with repairs to private homes for those who need it most**

- Continue to provide loans and grants for essential repairs and energy efficiency improvements.

8.3 In the absence of a comprehensive regulatory regime for the private rented sector,

selective licensing is a vital tool through which the Council can engage with landlords and improve housing standards through monitoring and enforcement of licensing conditions.

## 9. Proposals under consideration for a new selective licensing scheme

- 9.1 A review has been undertaken of which qualifying conditions Croydon meet as outlined in the Selective Licensing Guidance for Local Authorities. Further detail of how the qualifying conditions are met is provided in the appendices below.
- 9.2 The focus is on meeting the statutory criteria. Following advice from the Ministry for Housing Communities and Local Government (MHCLG), all conditions may be mentioned as supporting criteria where relevant, and particularly in how selective licensing can help tackle or address problems.
- 9.3 Potential designations in line with qualifying criteria are outlined below. The designation applies to an area comprising wards or lower super output areas (LSOAs). There are 28 wards in Croydon and 220 LSOAs. A LSOA often crosses ward boundaries:

### 9.3.1 Option one

Two designations that together cover approximately 92% of PRS in the borough, to address:

1. [D1] Property conditions and anti-social behaviour in 10 wards and 11 LSOAs. The PRS represents over 19% of all dwellings and there are significant home hazards.
2. [D2] Property conditions, anti-social behavior and deprivation in 12 wards and 5 LSOAs. The PRS represents over 19% of all dwellings and there are significant home hazards. There is also significant deprivation relative to the rest of Croydon and neighbouring areas.

Fairfield ward has the highest number of private rented dwellings - and tall residential buildings - in Croydon and a large number of serious home hazards. There has been a high net population increase in one LSOA in Fairfield ward.

Notes: This enables a targeted approach to tackling deprivation and anti-social behaviour in Croydon; building on the work of the current scheme. Dependent on advice from MHCLG, it may be necessary for Fairfield ward to be addressed in a separate designation focused on other qualifying criteria. Every ward in Croydon is included in Option One – either the whole or part of the ward.

<b><u>The 10 wards proposed for designation 1 in Option 1 are:</u></b>	<b><u>The 12 wards proposed for designation 2 in Option 1 are:</u></b>
Addiscombe East	Bensham Manor
Addiscombe West	Broad Green
Coulsdon Town	Fairfield
Crystal Palace & Upper Norwood	New Addington South
Norbury & Pollards Hill	Norbury Park
Park Hill & Whitgift	Selhurst
Purley & Woodcote	Shirley North
Purley Oaks & Riddlesdown	South Norwood
Selsdon Vale & Forestdale	Thornton Heath
South Croydon	Waddon
	West Thornton

	Woodside
<b><u>The 11 LSOAs proposed for designation 1 Option 1 fall within the following wards (excluding the 22 wards already mentioned):</u></b>	<b><u>The 5 LSOAs proposed for designation 2 Option 1 fall within the following wards (excluding the 22 wards already mentioned):</u></b>
Kenley New Addington North Sanderstead Selsdon & Addington Village Shirley South Old Coulsdon  LSOA codes: E01001075 E01001107 E01001034 E01001125 E01001135 E01001063 E01001065 E01001015 E01001068 E01001016 E01001106	New Addington North Selsdon & Addington Village Shirley South  LSOA codes: E01001054 E01001053 E01001061 E01001126 E01001133

See Appendix 1 and 3 for more detail on the evidence base for this designation. See Appendix 4 for the area to be covered under Option One [D1 and D2].

### 9.3.2 **Option two**

One designation to address property conditions across the whole borough.

1. [D3] Property conditions in all 28 wards. Taking the whole borough as ‘the area’ for designation, the private rented sector represents 36% of total housing stock in Croydon (58,585 PRS dwellings). Borough wide, there are Category 1 hazards in over 23% of private rented properties which is significant compared to the national average for serious home hazards.

Notes: The borough may not be accepted as the ‘area’ by the Secretary of State. Currently 6 wards fall under the 19% PRS threshold for selective licensing designation. It is possible that in 2020, the national average for private rented housing will change, which may change the position of some wards in relation to an above average size PRS as condition for selective licensing designation.

See Appendix 1 for more detail on the evidence base for this designation.

### 9.3.3 **Option three**

Two designations that together cover the whole borough, to address:

1. [D4] Property conditions in 22 wards. The PRS is over 19% of all dwellings and there are significant home hazards.

2. [D5] Anti-social behavior in 6 wards. The rate of anti-social behaviour linked to private rented housing is high. These 6 wards have lower numbers of private rented dwellings, but anti-social behaviour is a significant issue.

<b><u>The 22 wards proposed for designation 4 in Option 3 are:</u></b>	<b><u>The 6 wards proposed for designation 5 in Option 3 are:</u></b>
Addiscombe East Addiscombe West Bensham Manor Broad Green Coulsdon Town Crystal Palace & Upper Norwood Fairfield New Addington South Norbury & Pollards Hill Norbury Park Park Hill & Whitgift Purley & Woodcote Purley Oaks & Riddlesdown Selhurst Selsdon Vale & Forestdale Shirley North South Croydon South Norwood Thornton Heath Waddon West Thornton Woodside	Kenley New Addington North Old Coulsdon Sanderstead Selsdon & Addington Village Shirley South

Notes: CPRPL 2015-2020 was brought in to tackle anti-social behavior and it will be important to build on the work of the current scheme.

See Appendix 1 for more detail on the evidence base for this designation.

## 10. CONSULTATION

- 10.1 Where Cabinet approval is given to the consultation exercise and the taking of further steps to proceed towards a further selective licensing designation the Council will need to undertake the statutory consultation. An application to MHCLG would need to consider all representations made during the consultation. This requires the Council to take reasonable steps with persons who are likely to be affected by the proposed designation and to consider all such representations made and not withdrawn. The relevant section is 80(9) of Part 3 of the Housing Act 2004.
- 10.2 The consultation specification provided in the appendices below details the approach to consultation tender. A single Provider will be chosen to fully administer the consultation process. The consultation will consider:
- The role the Council should play in ensuring Croydon is a Better Place to Rent with a high quality private rented sector.

- The various options available and whether a selective licensing designation is the most appropriate means of dealing with the identified problems.
- The consequences of choosing one designation over another. See Section 9 for more detail on the options for designation including the proposed area to be covered by the designation.
- The proposed designation conditions and fees. See:
  - Appendix 5 – property licensing conditions.
  - Appendix 6 – licensing fee structure
  - Appendix 7 – frequently asked questions.

10.3 The Providers' expertise should ensure high levels of participation across all sections of the area involving private rented sector housing. This includes landlords, tenants, agents, Council services, Third Party organisations, support services, statutory providers, representative groups and other. The consultation should look to seek representations from persons who are both based in and outside of the Borough of Croydon. The impact of licensing can be felt in a wider area.

10.4 This consultation period will be 14 weeks from (proposed) Monday 11th November 2019 until Monday 17<sup>th</sup> February 2020.

## **11. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

11.1 The financial impact of this proposal is anticipated to commence in 2020/21 and be cost neutral. The cost of administering the selective licensing scheme is covered by charging licence fees to landlords.

### **11.2 The effect of the decision**

The introduction of selective licensing would mean that the council would incur additional costs for the administration of the scheme. It is expected that the costs will be covered by the license fee, as prescribed by the Housing Act 2004.

### **11.3 Risks**

- 3.1 There is the potential risk of a budget shortfall and a failure to effectively reduce Anti-Social Behaviour if the scheme does not receive sufficient applications. This risk is mitigated as we have the experience of running the scheme previously, and also by ensuring that we have sufficient staff levels to identify un-licensed properties and carry out licensing activities.
- 3.2 A number of schemes across the country have been subject to Judicial Review. These have only been successful where local authorities have failed to follow the correct processes or have been unable to justify part of their scheme, proposals or evidence base. There is therefore the potential for additional and unfunded legal work to meet any challenges or cases. To mitigate this risk, this report recommends funding for additional officers to carry out consultation and implementation and/or consultancy support.
- 3.3 Irresponsible and/or rogue landlords could migrate from neighbouring boroughs also seeking to introduce licensing schemes; however, this risk is mitigated through

approval for a scheme designating all wards in Croydon as a selective licensing scheme.

#### 11.4 Future savings/efficiencies

- 5.1 The scheme itself would be self-financing. The scheme has the potential to create potential savings in a number of areas:
- 5.2 Health benefits: the most common significant hazard found in older properties is excess cold which can be easily remedied by the installation of an adequate heating system and insulation. This would also contribute to reducing fuel poverty. Another significant hazard is trips and falls – works to remove the risk of these costs less than £400 but the cost to care for someone who has been injured by falling over is £3,000.
- 5.3 Fraud detection: Other licensing schemes have identified housing benefit, council tax benefit and leasehold tenancy fraud through their schemes, recouping money for the public purse as a result and bringing much needed council properties back into use for people that need them.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk, S151 Officer

## 12. LEGAL CONSIDERATIONS

- 12.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that selective licensing was introduced in Part 3 of the Housing Act 2004 alongside Part 1 (Housing Conditions) and Part 2 (Housing in Multiple Occupation). Part 3 of the Housing Act 2004 gives the Council the power to designate areas of selective licensing to help tackle concerns over high levels of anti-social behaviour or low housing demand (e.g. low value properties, high turnover of occupiers, significant vacancy). In 2015 the conditions for designation were expanded by The Selective Licensing Houses (Additional Conditions) (England) Order 2015 to include poor property conditions, high crime, high levels of deprivation and high migration. The Council can designate an area for selective licensing for five years but must first demonstrate the evidence of their concerns, look at alternative approaches and consult widely. Failure to engage in meaningful consultation with those likely to be affected by a proposed designation could lead to a scheme being quashed by the courts following judicial review.
- 12.2 Subject to limited exemptions, a valid licence must be held by the appropriate responsible person in respect of all privately rented properties in such a designated area, typically the landlord or managing agent. The legislation permits funds raised to be used for administration of the scheme and (subject to constraints) enforcement.
- 12.3 In 2015 revised approval arrangements were put in place such that where the proposed designation covers either 20% of the total geographic area of the authority or 20% of the total privately rented stock (based on consensus figures) the designation requires approval by the Secretary of State.
- 12.4 There is no 'light touch' process for authorities seeking to re-designate an area at the end of a period of licensing.

- 12.5 In addition as a public authority, the Council must take account of the provisions of the Human Rights Act 1998 and not act in a way which is incompatible with a Convention right. Under Article 8, any interference with the right to respect for a person's private and family life and home must be proportionate and Article 14 requires that there must be no unjustified discrimination within the scope of human rights on any grounds, such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.
- 12.6 The Council must also have 'due regard' to the Public Sector Equality Duty (PSED) in Section 149 of the Equality Act 2010. Section 149(1) provides that, in exercising its functions, a public authority must have due regard to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 12.7 Section 149(3) provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
  - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

### **13. HUMAN RESOURCES IMPACT**

- 13.1 There are no direct human resources impacts arising from the recommendations of this report.

Approved by Gillian Bevan Head of HR (Resources) on behalf of the Director of Human Resources

### **14. EQUALITIES IMPACT**

- 14.1 An Equalities Analysis has been carried out to ascertain the impact of a renewal of selective licensing on groups that share a protected characteristic. The key findings were that there is no reason to believe that the protected groups will be at any greater risk than



the rest of the population. Opportunities to advance equality have been taken, so no change to the recommendations is suggested.

- 14.2 In developing the proposal for consultation on renewal of selective licensing in Croydon, regard has been had to the council's Corporate Plan and its equality objectives contained in the Opportunity and Fairness Plan 2016-20.
- 14.3 Selective licensing has a positive impact relevant to all protected characteristic groups in that protection from unlawful discrimination is built into the selective licensing conditions. The proposed renewal of selective licensing in Croydon will offer vital protection for vulnerable tenants in a number of ways: through improving living and environmental conditions, providing enhanced protection against retaliatory eviction, signposting to other services, and joint working with other enforcement agencies to deal with crime and anti-social behaviour.
- 14.4 Our evidence comes from experience gained through implementation of the current selective licensing scheme in Croydon. Licensing inspectors talk to tenants and there are specific questions about health and anti-social behavior.
- 14.5 The outcome of our Equality Analysis in relation to the recommendations contained in this report are as follows:
- No major change – Selective licensing protects all vulnerable tenants. It would be a serious breach of licencing conditions if a landlord were to discriminate against any of the protected groups. Landlords who have been convicted of a discriminatory offence cannot receive a licence. Selective licensing provides additional safeguards because of the joint-working arrangements and signposting which are built into the scheme.

Approved by: Yvonne Okiyo, Equalities Manager. See Appendix 8.

## **15. ENVIRONMENTAL IMPACT**

- 15.1 The recommendations set out in this report should have a positive impact on energy use and energy efficiency in Croydon, as the selective licensing conditions include a requirement for landlords to improve the EPC rating of their properties. See Appendix 4 for the proposed selective licensing conditions.
- 15.2 The recommendations set out in this report should also have a positive impact on the living environment in Croydon. The selective licensing conditions encourage landlords to take responsibility for the condition of their properties and other matters such as waste disposal in the area relevant to a property.

## **16. CRIME AND DISORDER REDUCTION IMPACT**

- 16.1 The recommendations set out in this report should facilitate the prevention of crime in Croydon under Section 17 of the Crime and Disorder Act 1998 and reduction of crime and disorder under Section 6 of the same Act. Private rented properties are increasingly used for unlawful purposes such as for growing or smoking cannabis, or housing illegal immigrants who are often employed in conditions of near slavery. Selective licensing enables intelligence sharing between multiple agencies and provides for the Council to take a lead in bringing together other appropriate agencies to address the problems which may be present at a single address.

## **17. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 17.1 The report seeks authorisation for the commencement of the statutory consultation and engagement with key stakeholders on proposals to introduce a new selective licensing scheme in Croydon in 2020. The report seeks authorisation for the Executive Director Place to recommend an approach to renewal of selective licensing in Croydon, and delegated authority for the Cabinet Member for Homes and Gateway Services to give final approval for seeking a selective licensing designation from the Secretary of State in 2020.
- 17.2 These decisions are sought to ensure all residents, regardless of tenure, have access to decent, safe housing, feel protected and are treated fairly. These decisions are also aimed at improving the living environment across Croydon, and will enable targeted responses to the range of issues across the borough.

## **18. OPTIONS CONSIDERED AND REJECTED**

- 18.1 This report recommends the authorisation of a statutory consultation process on proposals to introduce a new selective licensing designation in Croydon. Options outside of the statutory process are not considered suitable.
- 18.2 This report could recommend to not begin the statutory process for renewal of the selective licensing scheme, however the Executive Director PLACE advises this would mean losing the opportunity to continue and build on the successful work of CPRPL 2015-2020. The intelligence gathered and experience gained through administering selective licensing in Croydon are invaluable to enforcement of housing standards. In the absence of a comprehensive regulatory regime for the private rented sector, selective licensing is a vital tool through which the Council can engage with landlords and improve housing standards through monitoring and enforcement of licensing conditions.

## **19. DATA PROTECTION IMPLICATIONS**

### **19.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'? YES**

The details of people and companies with an interest in the licensed property will be obtained as part of the application process.

### **19.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED? YES**

The Director of Public Realm confirms that a DPIA has been completed and signed off and will be kept under review

Approved by: Steve Iles Director of Public Realm

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### **CONTACT OFFICER:**

Nick Gracie-Langrick, Selective Licensing and Housing Manager  
Ext: 50190.  
Martin Davies, Senior Environmental Health Officer Ext. 61180.

**APPENDICES:**

Appendix 1 - PRS housing in Croydon

Appendix 2 – Housing conditions including review of housing conditions

Appendix 3 – Public data on population, migration and deprivation in Croydon

Appendix 4 – Map showing the area covered by Designation 1 & 2

Appendix 5 – Proposed conditions for CPRPL 2020

Appendix 6 – Proposed fee structure for CPRPL 2020

Appendix 7 – FAQ for CPRPL 2020

Appendix 8 – Equality Analysis Form

**BACKGROUND DOCUMENTS:** None

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**PRS housing in Croydon**  
**Numbers and % in each sector**  
**Map showing distribution**  
**Key statistics by ward, including % PRS, Category 1 hazards, and anti-social behaviour**  
**Map showing anti-social behaviour linked to PRS**

The housing standards and licensing team worked with a company who have experience preparing bids for selective licensing designations. Metastreet use historical council held data and public data to provide up to date tenure intelligence. Machine learning is used to generate predictive statistical models showing tenure and trends at the property level. The data provided below is from Metastreet's model unless otherwise stated. The predicted total number of PRS and PRS properties with at least one serious home hazard (Category 1 HHSRS) as of August 2019, Metastreet.

**Croydon statistics borough wide**

<b>Total population</b>	385,346 (ONS, 2018)	
<b>Total dwellings</b>	164,378	<b>% of total</b>
Social rented	24,493	14.9%
PRS	58,585	35.6%
Owner occupied	81,300	49.5%
Licence issued *	33,508	
<b>Property conditions</b>	<b>Total</b>	<b>% of PRS</b>
Category 1 Hazards	13,922	23.8%
<b>ASB (over five years)</b>	<b>Total</b>	
ASB incidents PRS	15,746	268.8 incidents per 1000 households
ASB incidents social rented	10,797	440.8 incidents per 1000 households

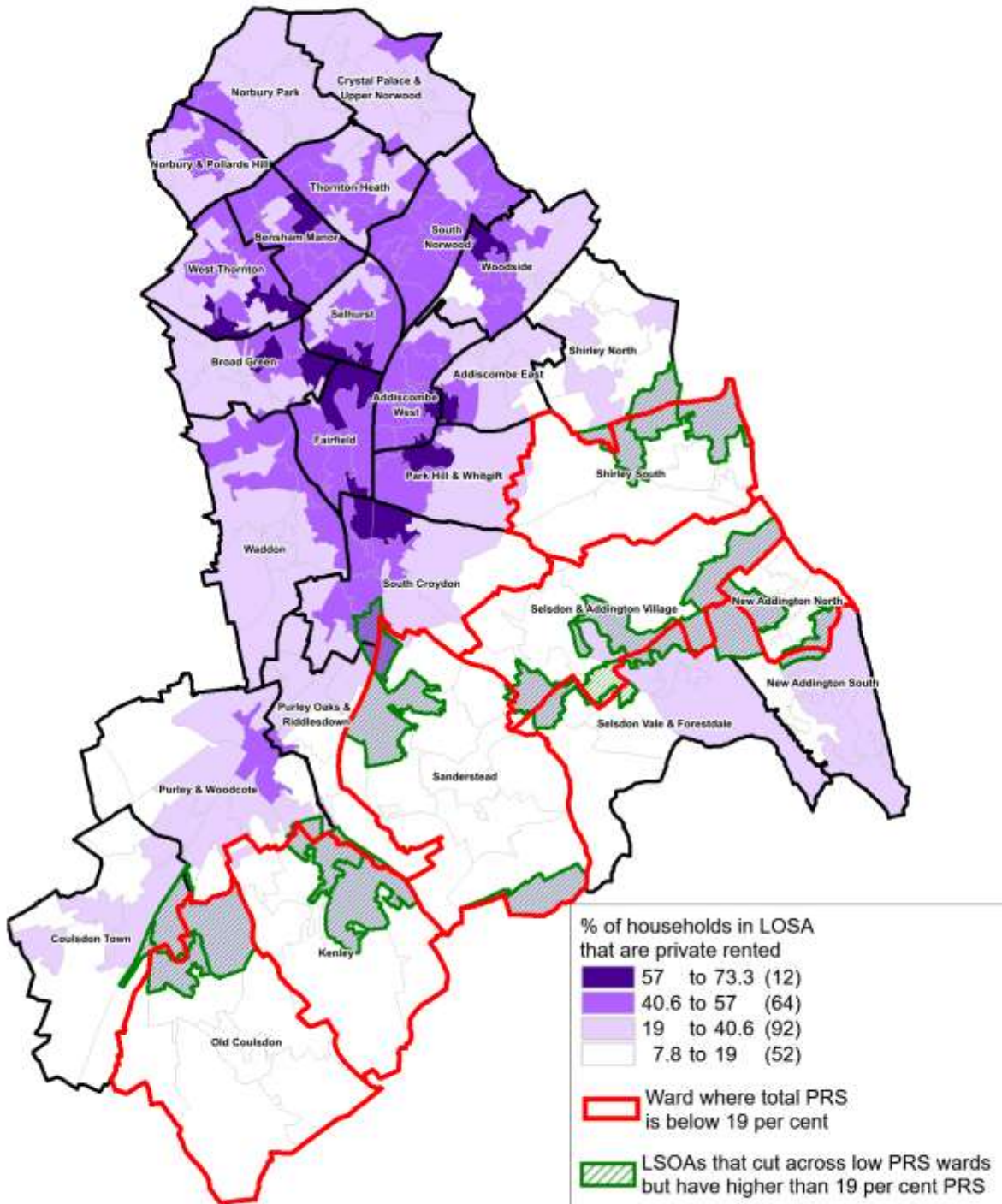
\* Please note at least 10,000 properties are exempt from selective licensing, due to their use as temporary or emergency accommodation or for other reasons.

**Croydon statistics by ward**

Please find below key statistics by ward, including % PRS , Category 1 hazards, and anti-social behaviour, as predicted by Metastreet in August 2019.

Please note that it isn't possible to provide deprivation and population data by ward due to ward boundary changes in 2018 which mean that Croydon wards no longer map onto LSOAs. Data on deprivation and population is at Borough and LSOA level and provided in Appendix 3.

**% of households that are private rented  
Metastreet Model - August 2019**



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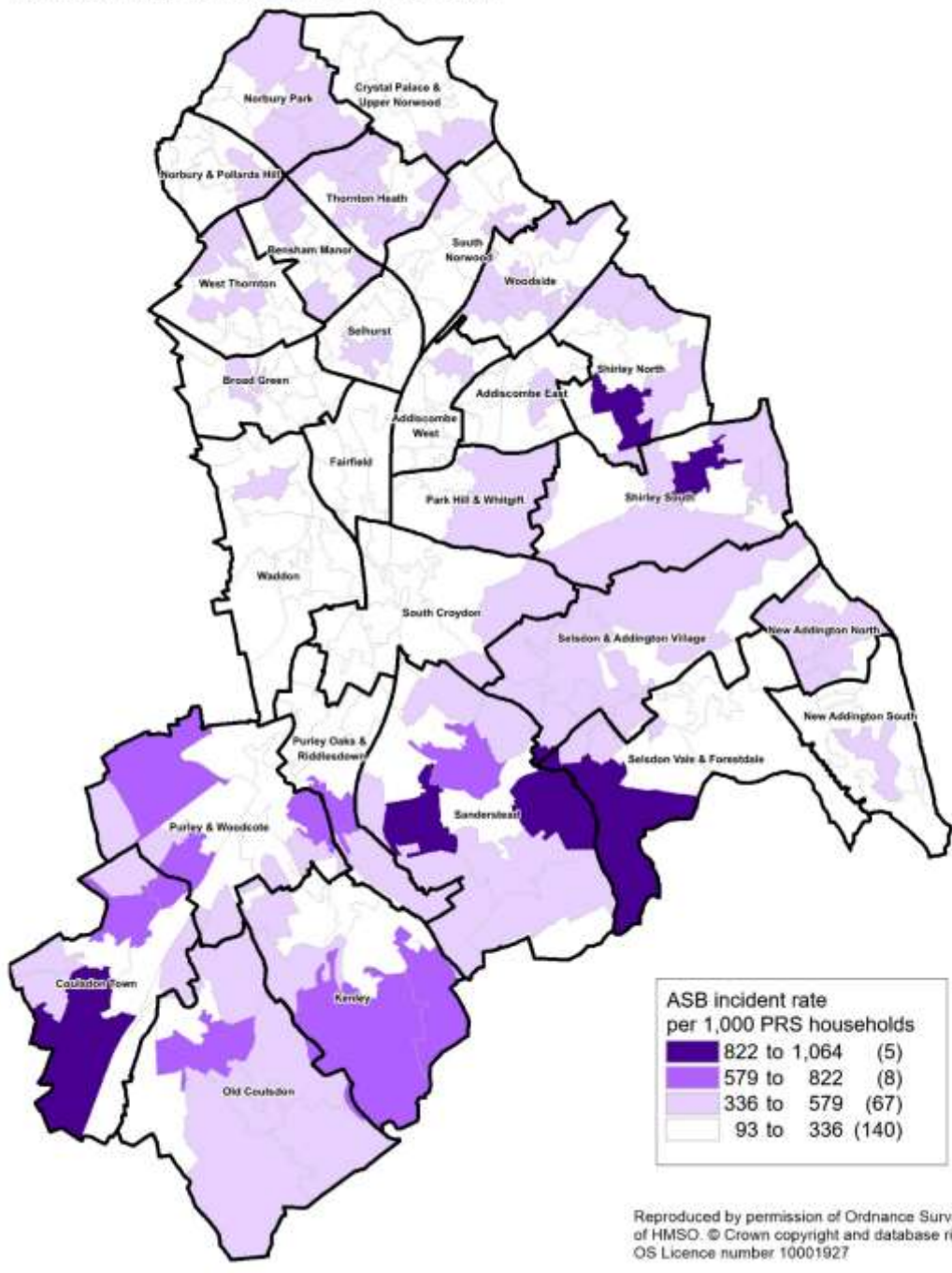
**Key to ward table:**

Ward	No Dwellings	No PRS	No Licensed	No Cat 1's	% Cat 1's in PRS	% PRS	% PRS Licensed	ASB incidents per 1000 PRS households
Addiscombe East	5,126	1,790	857	416	23.20%	34.9%	47.9%	247.5
Addiscombe West	7,138	3,488	2,630	697	20.00%	48.9%	75.4%	224.2
Bensham Manor	6,595	3,125	1,645	884	28.30%	47.4%	52.6%	289.3
Broad Green	7,879	3,638	2,123	816	22.40%	46.2%	58.4%	250.7
Coulsdon Town	5,712	1,281	461	314	24.50%	22.4%	36.0%	371.6
Crystal Palace & Upper Norwood	7,921	2,860	1,482	604	21.10%	36.1%	51.8%	255.9
Fairfield	8,444	4,792	4,688	642	13.40%	56.8%	97.8%	140.7
Kenley	4,128	754	389	234	31.00%	18.3%	51.6%	412.5
New Addington North	3,882	656	206	157	23.90%	16.9%	31.4%	407.0
New Addington South	4,481	969	262	241	24.90%	21.6%	27.0%	358.1
Norbury & Pollards Hill	4,988	2,002	1,210	499	24.90%	40.1%	60.4%	255.2
Norbury Park	3,774	1,092	370	350	32.10%	28.9%	33.9%	353.5
Old Coulsdon	4,001	570	229	193	33.90%	14.2%	40.2%	480.7
Park Hill & Whitgift	2,616	1,202	836	184	15.30%	45.9%	69.6%	162.2
Purley & Woodcote	6,934	2,011	1,112	514	25.60%	29.0%	55.3%	310.3
Purley Oaks & Riddlesdown	4,305	1,291	723	285	22.10%	30.0%	56.0%	243.2
Sanderstead	6,078	1,032	356	295	28.60%	17.0%	34.5%	385.7
Selhurst	5,468	2,525	1,193	688	27.20%	46.2%	47.2%	290.3
Selsdon & Addington Village	4,011	731	386	248	33.90%	18.2%	52.8%	466.5
Selsdon Vale & Forestdale	4,273	1,126	523	181	16.10%	26.4%	46.4%	213.1
Shirley North	6,186	1,242	438	273	22.00%	20.1%	35.3%	371.2
Shirley South	4,098	638	228	209	32.80%	15.6%	35.7%	404.4
South Croydon	8,209	3,718	2,536	812	21.80%	45.3%	68.2%	184.5
South Norwood	7,942	3,640	2,172	898	24.70%	45.8%	59.7%	242.9
Thornton Heath	7,643	3,278	1,552	1012	30.90%	42.9%	47.3%	358.8
Waddon	7,840	2,850	1,462	599	21.00%	36.4%	51.3%	224.2
West Thornton	7,010	3,175	1,897	889	28.00%	45.3%	59.7%	249.8
Woodside	7,527	3,077	1,542	762	24.80%	40.9%	50.1%	308.7

Blue = wards over 19% national average for private rented housing (English Housing Survey)

Yellow = wards under 19% national average for private rented housing

**ASB incidents from private rented households  
(Rate per 1,000 private rented households)**



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## **Housing conditions including review of housing conditions**

### **Review of Housing Conditions under Section 3(1) of the Housing Act 2004**

#### **Introduction**

This review is based on field work carried out between August 2018 and June 2019 followed by a comprehensive analysis of Council and Government data by a company called Metastreet. They use this data to provide up to date tenure intelligence. Machine learning is used to generate predictive statistical models showing tenure and trends at the property level. This includes the probability of Category 1 hazards as defined by the Housing Health and Safety Rating System (HHSRS)

During field work, in addition to dealing with routine complaints and enquiries the Selective Licensing Inspection Team targeted specific geographical areas around the borough. This programme was intensified as a result of funding from MCHLG as part of the Rogue Landlords Enforcement Grant initiative.

An inspection form was designed so that the following items of information could be collected:-

- Ownership, management, and tenant details
- Compliance with licencing conditions
- Presence of Category 1 and Category 2 hazards
- Rent levels and income levels
- Whether affected by ill health, disability, or ASB.

The inspection programme was not a classical house condition survey as each inspection is a triage and appropriate action must be taken by the inspectors when required. This slowed down the rate of inspections considerably compared to a standard house condition survey whereby everything is anonymous and surveyors only pass on findings in exceptional circumstances.

#### **Prior to the Housing Review Inspection Programme**

The current selective licensing scheme began in October 2015. The initial aim was to inspect every property which had been issued a licence. However, the number of applications was much larger than had been expected so the methodology was developed of contacting those landlords and agents with the largest number of licences so that multiple inspections could be arranged. This enabled the maximum number of inspections but after 2½ years, exactly half way through the 5 year scheme, 5,734 properties had been inspected, 18% of the number licenced at the time.

By adopting a maximum numbers approach the net effect was to target the more cooperative landlords rather than potential rogue landlords. Even so, 1,544 properties were found to be unsatisfactory and requiring enforcement action. Although most enforcement was informal it is significant that 27% of properties run by cooperative agents and landlords were not up to standard and would have remained so without Council intervention.

Following the Grenfell fire in June 2017 much more attention began to be paid to tower blocks. In Croydon, there are a large (and increasing) number of high rise buildings which are occupied by high percentages of private tenants. A policy decision was made to inspect all privately rented high rise flats. This also diverted attention from rogue landlords.

In early 2018 it was decided to change the approach towards targeting areas of privately rented property with known problems associated with ASB and environmental problems. This involved the design of new inspection forms which could be uploaded for data processing. This together with staff recruitment and training meant that in summer 2018 a pilot area was chosen for intensive survey.

For the staff this was an entirely new way of working and time was needed to accumulate the necessary experience. A review of the back office functions was also found to be needed and appropriate changes were made.

It became clear that there were a lot of properties which should be licenced but were not. Also, in many cases there were multiple problems which could only be dealt with by a multi-agency approach.

At the end of 2018 it was decided to carry out a review of the private rented housing stock and then make any necessary changes to the Council's approach to selective licensing and enforcement policies.

### **The Housing Review Inspection Programme**

The decision to carry out a review coincided with the availability of funds from MHCLG under the Rogue Landlord Enforcement Grant programme.

It was decided to target the inspection programme towards localities identified in the Council's Local Plan (Croydon Local Plan 2018). The Local Plan described a total of 98 centres many of which comprise neighbourhood shopping parades. Consequently there were a high number of flats over shops.

More than 20 such areas of varying sizes were targeted. Properties were called on without an appointment. A letter explaining the inspection was left and at least three attempts were made to gain access. No formal methods were used to obtain entry. All addresses in the area received a letter and as many addresses as possible were called at. Where access was not gained inspectors were instructed to obtain credible intelligence about whether or not a property was privately rented.

<b>Tenure</b>	<b>Count</b>
Licensable	1,228
No information	141
Owner-Occupied	104
Exempt	17
Short Term vacant	10
Long Term Vacant	1
Licensable but not licenced	9%*

\*Minimum number as not all have been fully checked in the office.

### **Crowding**

Crowding, as opposed to overcrowding is one of the hazards included in the HHSRS.

#### **From the HHSRS Operational Guidance Issued by the Government**

*Crowding covers hazards associated with lack of space within the dwelling for living, sleeping and normal family/household life... People who live in crowded conditions also tend to suffer multiple deprivation, and separating the effect of poverty from crowding is difficult... Lack of space and overcrowded conditions have been linked to a number of health outcomes, including psychological distress and mental disorders, especially those associated with a lack of privacy and childhood development. Crowding can result in... reduction of tolerance, and a reduction of the ability to concentrate... There should be sufficient space to provide for social interaction between members of the household, while allowing for private time away from other household members... Personal space and privacy needs are important for the individual members of the same household as well as for individuals or households sharing rooms and/or facilities. These needs vary reflecting both individual and cultural perceptions. Adolescents may need more space than the elderly. Small children need at least as much space as an adult. The need for privacy begins to develop from the age of eight and will be fully formed during puberty.*

The map below shows the distribution of households comprising more than two people where there were more than one person per room.

Over the past 12 months 30% of properties which were inspected and where more than two people lived had an occupancy rate of more than one person per room.

### **Housing Stress**

As part of the inspection tenants were asked how much rent they paid and how much income they had. While these questions were often not answered it was clear that there was usually a substantial mismatch between rent levels and the Local Housing Allowance. The situation was worse for larger families.

### **Dampness and Mould**

This hazard is also usually an indicator of deprivation as it relates to affordable warmth. All rented property should have an Energy Performance Certificate (EPC). The Government has recently made it mandatory that an EPC rating should be at least E; the Minimum Energy Efficiency Standard.

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**Public data on population, migration and deprivation in Croydon**  
**Map of deprivation across Croydon**  
**Map of deprivation relative to Southern Region Boroughs**

### Population

Croydon population in 2007	344,029 (ONS)
Croydon population in 2017	384,837 (ONS)
<u>% change 2007-2017</u>	12%

Croydon population in 2008	349,308 (ONS)
Croydon population in 2018	385,346 (ONS)
<u>% change 2008-2018</u>	10%

- 15 of 220 LSOAs in Croydon had a population increase of more than 15% in 2011-2017.
- One LSOA in Fairfield Ward had a population increase of more than 15% in 12 months.
- Between April 2011 and March 2019 Croydon was 2<sup>nd</sup> highest in the Southern Region boroughs for new registrations for National Insurance from people whose previous address was overseas (DWP).

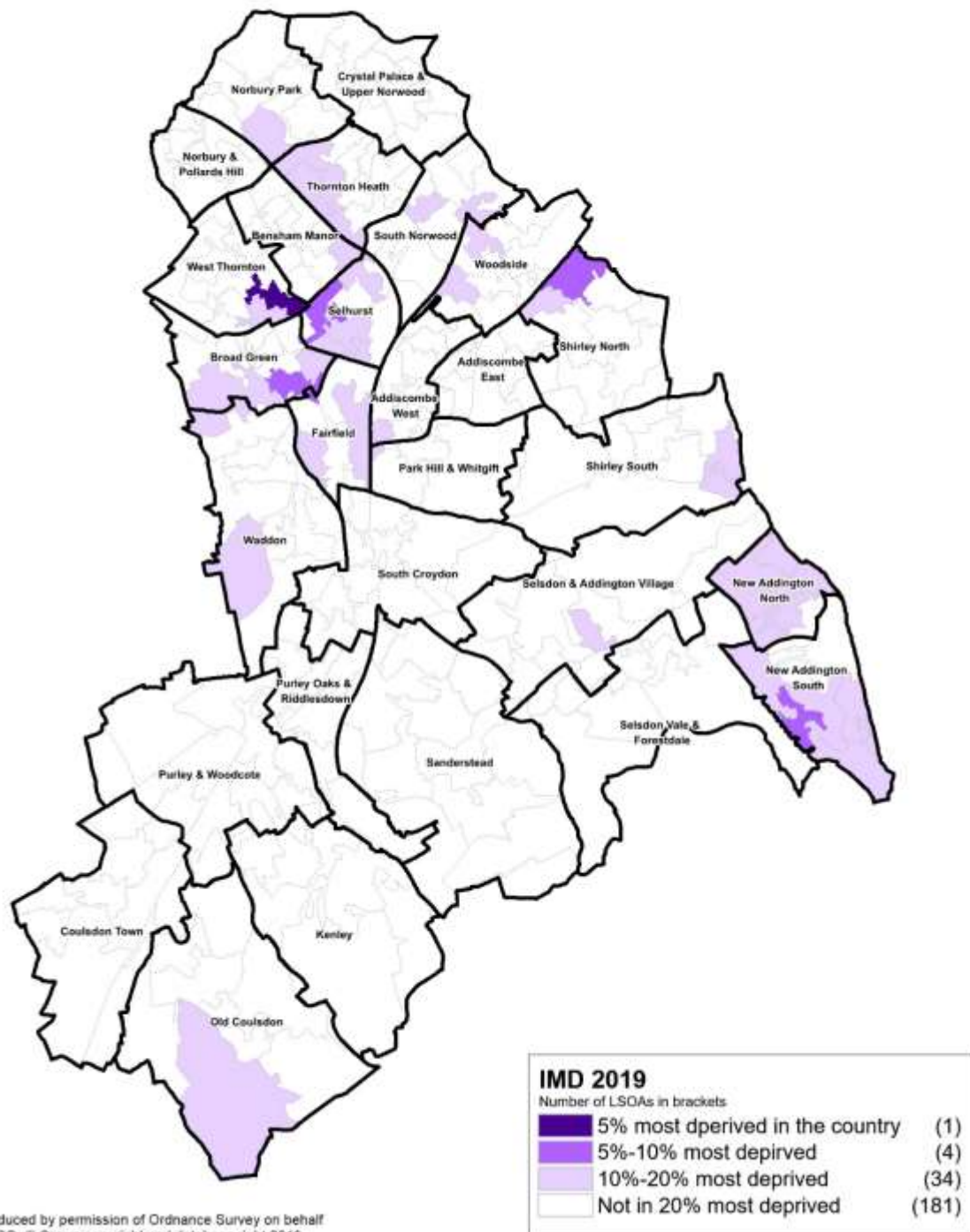
### Deprivation

According to the latest Indices of Multiple Deprivation (IMD, September 2019), Croydon is the most deprived of the six Southern Region boroughs in the current GLA London Plan – Wandsworth, Merton, Sutton, Kingston Upon Thames, Bromley. Please see table below.

According to the Indices of Multiple Deprivation 2019:

- 18.1% (69,576) of Croydon's population are among the 20% most deprived nationally
- 39 the 220 LSOAs in Croydon fall in IMD Decile 1 and 2
- Deprivation is relatively high in New Addington North and South
- Within deprivation sub-categories, crime and housing deprivation are relatively high across Croydon.

### Indices of Deprivation 2019 Croydon Lower Super Output Areas (LSOAs)



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South London Borough	Overall Deprivation	Income	Employment	Education, Skills and Training	Health Deprivation and Disability	Crime	Barriers to Housing Services	Income Deprivation Affecting Children (IDACI)
<b>Croydon</b>	<b>102</b>	<b>89</b>	<b>128</b>	<b>203</b>	<b>165</b>	<b>74</b>	<b>15</b>	<b>78</b>
<b>Wandsworth</b>	<b>173</b>	<b>162</b>	<b>238</b>	<b>308</b>	<b>193</b>	<b>101</b>	<b>39</b>	<b>150</b>
<b>Merton</b>	<b>214</b>	<b>184</b>	<b>241</b>	<b>288</b>	<b>234</b>	<b>139</b>	<b>128</b>	<b>184</b>
<b>Sutton</b>	<b>227</b>	<b>199</b>	<b>223</b>	<b>259</b>	<b>225</b>	<b>172</b>	<b>110</b>	<b>198</b>
<b>Bromley</b>	<b>230</b>	<b>219</b>	<b>231</b>	<b>281</b>	<b>275</b>	<b>132</b>	<b>32</b>	<b>206</b>
<b>Kingston Upon Thames</b>	<b>270</b>	<b>236</b>	<b>281</b>	<b>306</b>	<b>289</b>	<b>207</b>	<b>60</b>	<b>249</b>

### Rank of deprivation – Croydon compared to other South London Boroughs

Rank of average rank (LSOAs) IMD 2019

1 is most deprived district in the country. 317 is least deprived.

(\* Table for illustrative purposes. Living Environment and Income Deprivation Affecting Older Persons (IDAOP) have been excluded but can be found at IMD, September 2019)

South London Boroughs according to London Plan



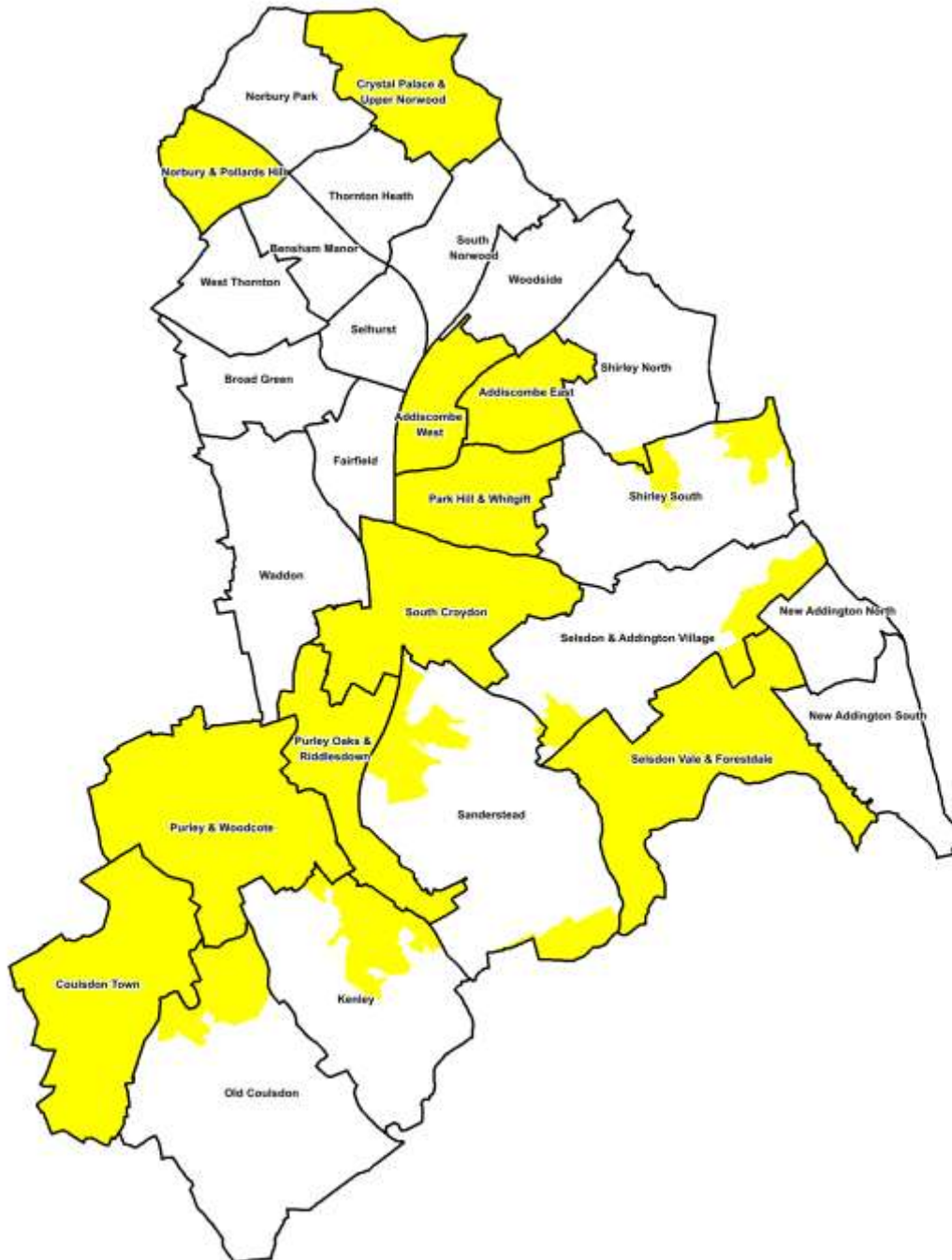
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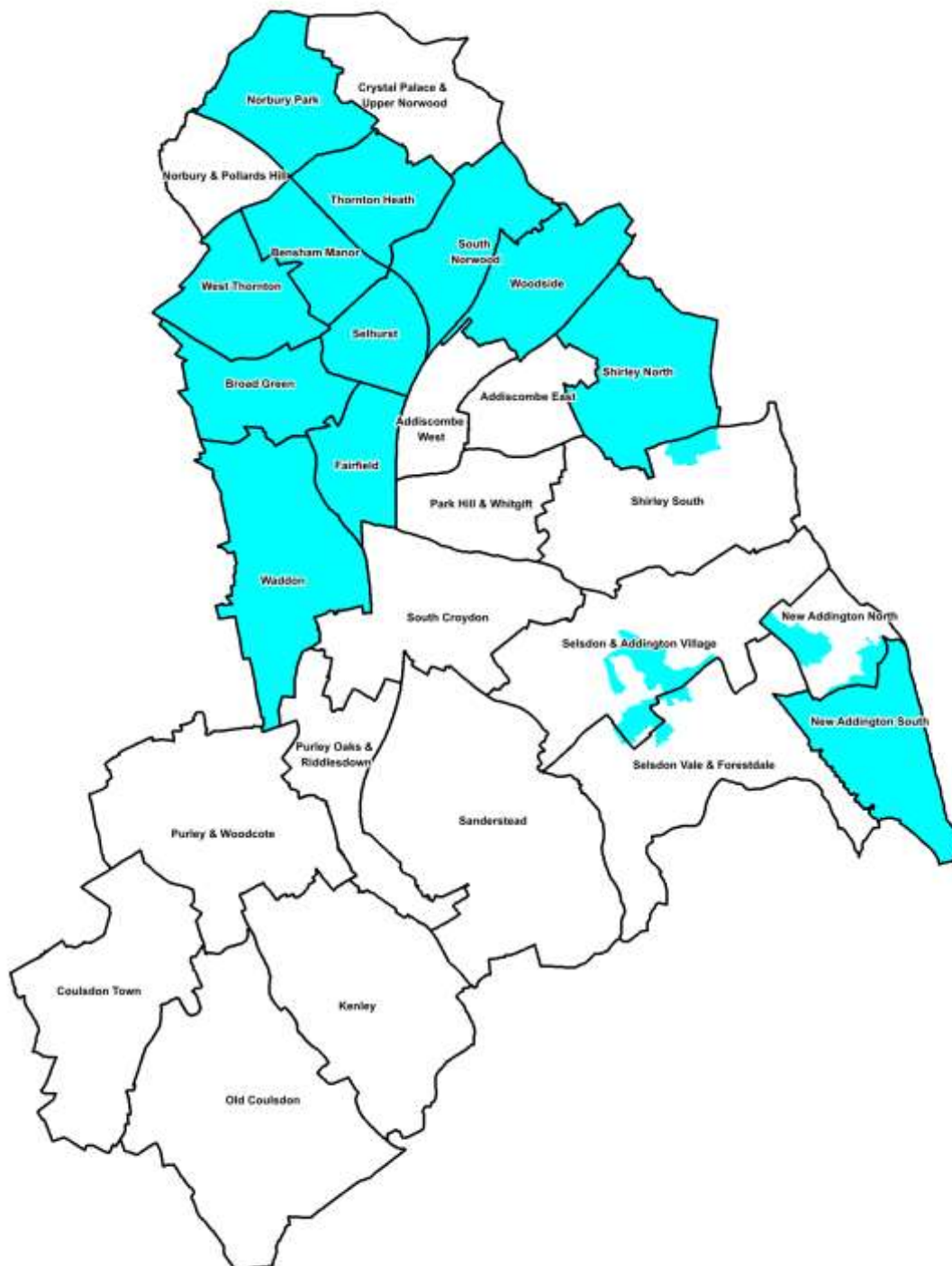
**Map showing the area covered by Designation 1 in 9.3.1 Option One**  
**Map showing the area covered by Designation 2 in 9.3.1 Option One**

**Map showing the 10 wards and 11 LSOAs covered by Designation 1 in Option One – Section 9.3.1**



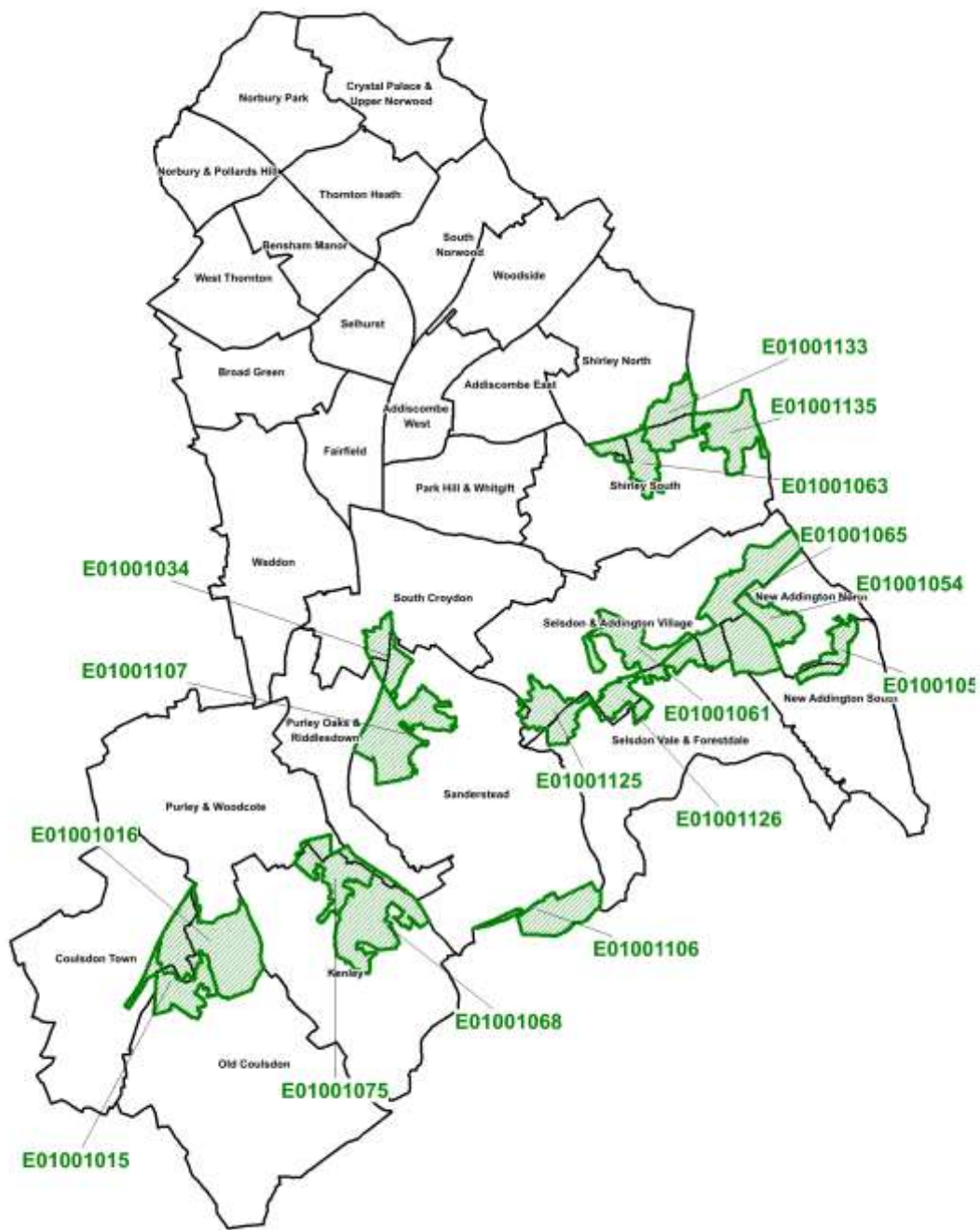
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**Map showing the 12 wards and 5 LSOAs covered by Designation 2 in Option One – Section 9.3.1**



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Map showing the 16 LSOAs referenced in Option One (Designations 1 and 2) – Section 9.3.1



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## Proposed conditions for CPRPL 2020

### Croydon Private Rented Property Licence 2020 [CPRPL 2020]

#### Proposed Licence Conditions

The following standard licence conditions will be applied to all licences that are issued. A CPRPL 2020 can be issued for a single dwelling or multi-let property (>1 dwelling).

#### 1. TENANCY MANAGEMENT

- 1.0 The Licence Holder shall supply the occupiers of the property with a written statement of the terms on which they occupy the property [**MANDATORY CONDITION**] including:
  - 1.0.1 Details of the arrangements in place to deal with repair issues including contact details.
  - 1.0.2 Details of the arrangements in place to deal with emergency issues including contact details.
  - 1.0.3 Details of the arrangements in place to deal with pest control/proofing issues including contact details.
  - 1.0.4 Details including the name, address and emergency contact number of the Licence Holder or managing agent responsible for the common parts of the property.
  - 1.0.5 Copies of the written statement of terms and details (1.01 – 1.0.4) must be provided to the Council for inspection within 14 days upon request.
- 1.1 The Licence Holder must supply a current copy of the Energy Performance Certificate (EPC) to all tenants/occupiers at the start of their tenancy. [**MANDATORY CONDITION**]
- 1.2 The Licence Holder must supply a copy of the current Selective Licence to all tenants/occupiers at the start of their tenancy.
- 1.3 The Licence Holder shall supply a copy of the current gas safety certificate or installation certificate (new boilers) to all tenants/occupiers at the start of their tenancy.
- 1.4 The Licence Holder shall obtain references from persons who wish to occupy a letting in the property before entering into any tenancy, licence or other agreement with them to occupy the accommodation [**MANDATORY CONDITION**].
  - 1.4.1 No new person who wishes to occupy shall be allowed to occupy the accommodation if they are unable to provide a reference.
  - 1.4.2 The Licence Holder must retain all references obtained from occupiers for the duration of this licence and provide copies to the Council within 14 days on request.
- 1.5 The Licence Holder shall protect any deposit taken under an assured short-hold tenancy by placing it in a statutory tenancy deposit scheme within 30 days of receipt.

- 1.5.1 A tenant must be given the prescribed information about the deposit protection scheme within 30 days of receipt of the deposit.
  - 1.5.2 This protection receipt and prescribed information given to the tenant must be retained for the duration of the licence and provided to the Council within 14 days on request.
- 1.6 The Licence Holder shall ensure that inspections of the property and outside space are carried out at least every six (6) months to identify any problems relating to the condition, occupancy and management of the property.
- 1.6.1 The records of such inspections shall be written and kept for the duration of this licence.
  - 1.6.2 The record must contain a log of who carried out the inspection, date and time of inspection including any issues and follow up action(s) taken.
  - 1.6.3 The record(s) must be provided to the Council within 14 days on request.
- 1.7 The Licence Holder must make sure the property is not overcrowded.
- 1.7.1 No tenancy shall be taken up where it is deemed to place the property into a condition of overcrowding.
  - 1.7.2 No new resident must be permitted to occupy the house or any part of the house if that occupation results in overcrowding.
  - 1.7.3 The Licence Holder will ensure by 6 monthly inspections that the property is assessed for overcrowding and take appropriate action to reduce such an occurrence.

## **2. ANTI-SOCIAL BEHAVIOUR**

- 2.0 The Licence Holder must provide to the Council details in writing of the tenancy management arrangements that have been, or are to be, made to prevent or reduce anti-social behaviour (ASB) by persons occupying or visiting the property. The following arrangements shall be implemented to fulfil the requirements of this condition:
- 2.0.1 Provision of an emergency 24 hour contact number (including out of hours response arrangements).
  - 2.0.2 Written records from 6 monthly property inspections (including actions) for condition, occupancy and management of the property.
  - 2.0.3 Copies of the tenancy management arrangements are to be supplied to the Council within 14 days on request.
- 2.1 The Licence Holder shall effectively address problems of ASB resulting from the conduct on the part of occupiers of, or visitors to the premises by complying with the requirements of paragraphs 2.1.1 to 2.1.9 below:
- 2.1.1 The Licence Holder must not ignore or fail to take action, if he/ she has received complaints of anti-social behaviour (ASB) that concern the visitors to or occupiers of the premises.

- 2.1.2 The Licence Holder shall from the date of receipt of the complaint of ASB, monitor and investigate any allegations of ASB.
- 2.1.3 If a complaint is received, or ASB is discovered, the Licence Holder must contact the tenant within 7 days. The tenant must, in writing, be warned of the allegations of the ASB and of the consequences of its continuation.
- 2.1.4 Where the ASB is continuing after 14 days from warning letter 1 (condition 2.1.3), the Licence Holder, or his agent must, within 14 days, visit the premises and provide the tenant with a further warning letter advising them of the possibility of eviction if their behaviour continues.
- 2.1.5 If after 14 days of giving warning letter 2 (as in condition 2.1.4), the tenant has taken no steps to address the ASB and the ASB is continuing the Licence Holder shall take formal steps under the written statement of terms for occupation, e.g. the tenancy agreement or licence and which shall include promptly taking any legal eviction proceedings to address the ASB.
- 2.1.6 Where the Licence Holder or his agent has reason to believe that the ASB involves criminal activity the Licence Holder shall ensure that the appropriate authorities are informed. The Licence Holder may inform the police and the Council. If invited to a case conference or multi-agency meeting the Licence Holder shall attend.
- 2.1.7 Any correspondence, letters and records referred to in conditions 2.1 (2.1.1 – 2.1.6) above must be provided to the Council within 14 days on request.
- 2.1.8 Any letters, meeting notes, notes following telephone conversations; relating to conditions 2.1 (2.1.1 – 2.1.6), sent or received by the Licence Holder, or agent of the Licence Holder, must be kept for the duration of the licence.

### **3 PROPERTY MANAGMENT**

- 3.0 The Licence Holder shall ensure that all gas installations and appliances are in a safe condition at all times [**MANDATORY CONDITION**].
  - 3.0.1 A copy of the current gas safe certificate must be provided to all tenants/ occupiers at the start of their tenancy.
  - 3.0.2 There must be a valid gas safety certificate or installation certificate (new boilers) at all times during the period of this licence (no break in coverage).
  - 3.0.3 Copies of the annual test certificates must be sent to the Council within 14 days of issue or within 14 days on request.
- 3.1 All electrical appliances supplied by or on behalf of the Licence Holder must be kept in a safe condition and meet the requirements of the relevant British Standard [**MANDATORY CONDITION**].
  - 3.1.1 A copy of the current electrical appliance(s) test certificate must be provided to all tenants/ occupiers at the start of their tenancy.
  - 3.1.2 All electrical appliances must be tested regularly and copies of electrical appliance test certificate(s) retained for the duration of the licence and provide copies to the Council within 14 days on request.
  - 3.1.3 A portable appliance test is an effective way to identify appliance defects.

- 3.2 All furniture supplied by or on behalf of the Licence Holder must be kept in a safe condition and meet the requirements of the relevant British Standard [**MANDATORY CONDITION**].
- 3.2.1 A declaration identifying the furniture provided and as to the safety of such furniture must be provided to the Council within 14 days on request.
- 3.3 The Licence Holder must ensure that the occupiers of the house are given suitable information in writing about waste and recycling storage and collection at the start of their occupation. A document or email that offers the information in 3.3.1 to 3.3.4 (all with links to the Croydon Council website) is deemed acceptable for this condition.
- 3.3.1 The collection days for the refuse and recycling bins for the house.
- 3.3.2 Details on what they can and can't recycle.
- 3.3.3 How they can organise collection of or dispose of bulky waste
- 3.3.4 General waste guidance from the Authority's website.
- 3.3.5 A copy of the information provided to the occupiers must be retained for the period of the licence and provided to the Authority within 14 days on request.
- 3.4 The Licence Holder must ensure that regular checks are carried out to ensure that the common parts, gardens and yards are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities, other than waste stored in appropriate receptacles for the storage of household refuse and recycling; and that waste such as old furniture, bedding, rubbish or refuse from the house is not left outside the property or in its vicinity.
- 3.4.1 No refuse shall be kept in the front or rear garden other than in an approved storage container for that purpose.
- 3.5 If the Licence Holder becomes aware that the occupiers of the house or their visitors are not using the waste disposal facilities provided and/or leaving waste outside the house or in its vicinity (for example old furniture, mattresses), they must ensure that a warning letter is sent to the occupiers within 14 days advising them to remove the items immediately.
- 3.5.1 Any correspondence, letters and records created in compliance with this condition must be retained for the duration of the licence and provided to the Council within 14 days on request.
- 3.6 The Licence Holder must ensure that prompt action is taken to investigate and effectively address complaints about disrepair, waste or pest infestation at the property.
- 3.6.1 The Licence Holder must ensure, in particular that a written response is made to any such complaint within 14 days of notification, stating what action has been or will be taken giving time periods.
- 3.6.2 Copies of any such written complaint (including by email) and the response referred to in conditions 3.6.1 must retained throughout the term of the tenancy and be provided to the Council within 14 days on request.



- 3.6.3 The tenant must be informed of any actions that he / she needs to take with regards their responsibilities for dealing with pest infestations in line with tenancy agreements.
- 3.7 Where the Licence Holder becomes aware of a pest problem or infestation at the property he shall take steps to ensure that a treatment programme is carried out to eradicate the pest infestation.
- 3.8 The Licence Holder shall ensure that any repairs, improvement works or pest treatments at the house are carried out by competent person(s) who is employed directly by the Licence Holder or an agent/employee of the Licence Holder. Copies of receipts and/or invoices for any such works must be retained for the period of the licence and provided to the Authority within 14 days on request.
- 3.9 The Licence Holder must inform the Council within 14 days of any material changes in their own circumstances and, within 14 days of becoming aware of them, of any known and material change in the circumstances of the person managing or and person involved in the management of the house, such as:
- 3.9.1 Details of any unspent convictions not previously disclosed to the Authority that may be relevant to the Licence Holder or the property manager or the status of either of them as a 'fit and proper person', including in particular a conviction in respect of any offence involving fraud or dishonesty, violence, drugs or any offence listed in Schedule 3 to the Sexual Offences Act 2003.
  - 3.9.2 Details of any finding by a court or tribunal against the Licence Holder and/or the property manager that he or she has practised unlawful discrimination.
  - 3.9.3 Details of any contravention on the part of the Licence Holder or property manager relating to housing, fire safety, planning, public health, environmental health, or landlord and tenant law, which has led to civil or criminal proceedings and a judgment or finding being made against him or her.
  - 3.9.4 Information about any property the Licence Holder or property manager owns or manages, or has owned or managed:
    - 3.9.4.1 which has been made subject to a control order under section 379 of the Housing Act 1985, in the five years preceding the date of the application; or
    - 3.9.4.2 which has been the subject of any enforcement action described under Part 1 sections 5(2) or 7(2) of the Housing Act 2004, concerning Category 1 and Category 2 housing condition hazards;

**or**

    - 3.9.4.3 in relation to which a local housing authority has either refused to grant a licence under Part 2 or 3 of the Act, or has revoked a licence.
    - 3.9.4.4 which has been the subject of an interim or final management order under the Housing Act 2004.

- 3.9.5 For the Licence Holder to provide information to the Council any material changes in their own circumstances and of any known and material change in the circumstances of any person managing or involved in the management of the house. This must be provided to the Council within 14 days on request.
- 3.9.6 The material change can relate to any action that has occurred in relation to any activity within England and is not limited to the Borough of Croydon.

#### **4.0 FIRE SAFETY**

- 4.0 The Licence Holder must make sure that a smoke alarm is installed on each storey of the house on which there is a room used wholly or partly as living accommodation. All smoke alarms or fire detection systems within the house must be maintained in good working order at all times during the period of this licence [**MANDATORY CONDITION**].
- 4.0.1 Within 14 days of request, the Licence Holder must make a declaration as to the positioning and operation of the smoke alarms.
- 4.0.2 The Licence Holder must regularly check the working order of the smoke alarm or fire detection system.
- 4.0.3 Certain fire detection systems have inspection frequencies dictated by recommendations in British Standards. A copy of the current test certificate(s) (including periodical inspection report / annual check) must be provided to the Council within 14 days on request.
- 4.0.4 The Licence Holder must test any smoke alarm within the property on uptake of a new tenancy. If the smoke alarm is not working then a new smoke alarm must be installed.
- 4.0.5 For Multi-Let Property licences. The licence holder must ensure that a Fire Risk Assessment is undertaken in accordance with The Regulatory Reform (Fire Safety) Order 2005 and that action to minimise the risk of fire at the property (containing dwellings) is taken in accordance with the assessment. The licence holder must ensure that any fire detection equipment, fire alarms and emergency lighting at the property are maintained in good working order by competent persons. The licence holder must ensure that the Council is provided with, if requested, a copy of the Fire Risk Assessment, all periodical inspection reports and test certificates for any automatic fire alarm system, emergency lighting and fire-fighting equipment provided in the property.
- 4.1 A carbon monoxide alarm is installed in any room in the house which is used wholly or partly as living accommodation and contains a solid fuel burning combustion appliance.
- 4.1.1 Keep any such alarm in proper working order and supply the Council within 14 days on request with a declaration by him as to the condition and positioning of any such alarm.
- 4.2 The Licence Holder shall ensure that tenants are fully briefed about what to do in the event of a fire. A written declaration of fire procedure shall be submitted to the tenant

at the start of the tenancy. A copy of the fire procedure must be provided to the Council within 14 days on request.

## **5.0 GENERAL**

5.0 The Licence Holder must arrange for access not giving less than 24 hours' notice to be granted at any reasonable time and must not obstruct Council officers carrying out their statutory duties including the surveying of the property to ensure compliance with licence conditions and any relevant legislation.

5.1 The Licence Holder shall if required provide the Council with the following particulars with respect to the occupancy of the house:

5.1.1 The names, sex, age and numbers of individuals/households accommodated, specifying the rooms they occupy within the property.

5.1.2 The function of the room and size of the room.

5.1.3 The information shall be provided to the Council within 14 days on request.

5.2 The Licence Holder shall inform the Council of any change in ownership, Licence Holder, property manager or interested party of the house.

5.3 The Licence Holder shall ensure that whilst any alteration or construction works are in progress, the work is carried out to ensure the safety to all persons occupying or visiting the premises.

5.3.1 Before significant works start a minimum of 14 days' notice shall be given to the tenant (except emergency or by agreement).

5.4 The Licence Holder shall ensure that on completion of any works, the property shall be left in a clean tidy condition and free from builders' debris.

5.5 The Licence Holder shall ensure that the property meets relevant planning and building regulation requirements and that the status of the property is in line with the required legislation.

5.5.1 Website: For planning and building regulation queries please refer to the planning pages on the Council's website

Address: Public Realm Division, Place Department, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.

Telephone: 0208 726 6100.

## **6. MANAGERS RESPONSIBILITY FOR COMPLIANCE WITH LICENCE CONDITIONS**

6.0 A Licence Holder can impose restrictions or obligations on another person to ensure that the licencing conditions are satisfied. A Licence Holder can only impose restrictions or obligations where that person has consented to the imposition of the restrictions or obligations. If the Licence Holder appoints a person to manage the house (where this involves the consent to the imposition of the restriction or obligations) during the period of the licence, he or she must meet conditions 6.1 to

6.4 inclusive. This condition is to ensure there is clarity over who has responsibility to meet the conditions.

- 6.1 Before or upon the person's appointment, obtain from the person a written declaration ("Declaration of Management") identifying the licence conditions, if any, by which he or she agrees to be bound. The declaration can state compliance with;
  - 6.1.1 All of the conditions.
  - 6.1.2 Some of the licence conditions
  - 6.1.3 None of the licence conditions.
- 6.2 Ensure that the "Declaration of Management" includes:
  - 6.2.1 A recital that the person has read and understood the requirements of the licence conditions;
  - 6.2.2 A notice informing the person that a failure to comply with the conditions may result in criminal and/or civil liability, including an unlimited fine or a financial penalty of up to £30,000 for each breach;
  - 6.2.3 A notice that, if the person requires advice about the conditions or any failure to comply with them he or she should consult a Citizens Advice Bureau or a housing solicitor, before signing the declaration;
  - 6.2.4 A recital that the person understands the consequences of failing to comply with the licence conditions;
  - 6.2.5 A recital that either (6.1.1) the person agrees to be bound by all of the licence conditions, (6.1.2) the person agrees to be bound by such of the conditions as the declaration specifies or (6.1.3) a recital that the person does not agree to be bound by any of the licence conditions, and
  - 6.2.6 In the case of (6.2) or (6.3) below, a statement that the Licence Holder alone is bound by the licence conditions;
- 6.3 Ensure that the aforementioned "Declaration of Management" is signed and dated by the appointed manager; and
- 6.4 Either on request from the Council or within 14 days of the manager's appointment, ensure that the Council is provided with a copy of the "Declaration of Management".

**Note.** Section 90 of the Housing Act 2004 enables the Council to impose conditions on the licence holder and other appointed persons. Some of these conditions are mandatory conditions as required by section 90(4) and listed in Schedule 4. CPRPL 2020 is a Part 3 scheme. Conditions 1.0, 1.1, 1.4, 3.0, 3.1, 3.2 and 4.0 are the mandatory conditions.

**Failure to comply with any licence condition may result in proceedings including fines up to £30,000 and loss of the licence.**

**GLOSSARY:**

**ANTI SOCIAL BEHAVIOUR** – A widely used definition of anti-social behaviour is the definition contained in the Crime and Disorder Act (1998): ‘Acting in a manner that caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household.’

**BUILDING CONTROL**- This licence does NOT grant any Building Control (Development Control) approvals, consents or permissions, retrospectively or otherwise. This licence does not offer any protection or excuse against enforcement action taken by the Building Control (Development Control) Department.

**CONSUMER RIGHTS & UNFAIR PRACTICES** - The Licence Holder’s attention is drawn to Office of Fair Trading’s (OFT) guidance on unfair contracts in relation to their tenancies or licences. The Licence Holder must negotiate its agreements in good faith and must not carry out misleading or aggressive commercial practices. Full information should be supplied to any prospective occupier including details of this licence. It is not the responsibility of the Authority’s Property Licensing Team to ensure the Licence Holder has complied with the above statutory requirements. If you are unclear on any of the matters outlined above, you should seek professional advice.

**ENERGY PERFORMANCE CERTIFICATE (EPC)** – a certificate (and associated report) that sets out the energy efficiency rating of a property and contains recommendations for ways in which the energy efficiency of the property could be improved. Most domestic (and non-domestic) buildings sold, rented out or constructed since 2008 must have an EPC. An EPC may also be required when a property is altered in particular ways.

**LICENCE HOLDER** – A licence holder has full responsibility for ensuring that the licence conditions are met. The Council will determine that the licence holder is the most appropriate person to hold the licence. For the purposes of the conditions this person can also include a person who has, for the term of the licence, consented to the Licence Holder imposing restrictions or obligations on them to ensure that the licencing conditions are satisfied. This consent must be agreed formally and be sent in at the point of the licence application.

**OVERCROWDING** – An overcrowded house is measured using a statutory standard contained within the Housing Act 1985. The standard includes any habitable room (bedroom, living room, dining room, study etc) but does not include non-habitable rooms such as the bathroom or a non-dining kitchen or hallway. The areas with ceilings less than five foot (1.524m) are not included in the measurements. The standard considers:

1. Room standard – numbers of people permitted with room numbers. E.G If there are two bedrooms a maximum of three people can occupy.
2. Space standard – numbers of people permitted to sleep in rooms of specified sizes. E.G. One person (over 10 years old) can sleep in a room 6.5 to 8.36m<sup>2</sup> (70 to 90ft<sup>2</sup>)
3. Gender overcrowding - no two persons, over 10 years old, of opposite sex should have to sleep in the same room (unless living as a couple).

The government has proposed the introduction of a bedroom standard to replace the current statutory standard set out above. A standard number requirement of bedrooms is calculated for each household in accordance with its age/sex/marital status composition. In

addition to the Overcrowding Standards, we also have regard to the provisions of the Housing Health and Safety Rating System (HHSRS).

**PLANNING PERMISSION** - This licence does NOT grant any planning approvals, consents or permissions under the Town and Country Planning Act 1990 or any related planning legislation, retrospectively or otherwise. If the property is being used as a House in Multiple Occupation (HMO) this may constitute a breach of planning control and you should check the Authority's website to ensure the correct planning permissions are in place. This licence does not offer any protection against enforcement action taken by the Planning Department. If you are unclear on the matters outlined above you should seek professional planning advice.

**PROPERTY CONDITION** - This licence is NOT evidence that the property is safe or free from hazards and defects. The licence does not offer any protection against criminal or civil legal action being taken against the Licence Holder, or anyone else with an interest in the property, in respect of any hazards, nuisances or any other problems discovered in relation to the condition of the property.

The property licence and conditions do not imply or grant by inference or otherwise any approval or permission for any other purposes including those for Building Control, Development Control and under The Regulatory Reform (Fire Safety) Order 2005. Conversely compliance with any of those requirements does not confer or imply compliance with the requirements of the Housing Act 2004 including property licensing.

Any requirements relating to the licence and conditions are without prejudice to assessments and appropriate actions including enforcement actions under the Housing Act 2004. This includes actions to deal with category 1 and category 2 hazards as may be identified under Housing Health and Safety Rating System (HHSRS) and does not preclude such action.

**PROSECUTION/ CONTRAVENTIONS CONSEQUENCES** – If an offence is committed the Council may look to take action which can include the issuing of a Simple Caution, Financial Penalty, or a prosecution in the Magistrates Court. Please note that any legal action taken against the Licence Holder or anyone associated with Licence Holder, or the management of the property (with or without responsibility for conditions), may affect the Licence Holder's 'fit and proper' status. The Authority can revoke or vary the licence at any time, giving proper statutory notice.

**SUPERIOR LANDLORD** – the person or company for the time being who owns the interest in the property which gives him the right to possession of the premises at the end of the landlord's lease of the property.

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## Proposed fee structure for CPRPL 2020

Croydon Private Rented Property Licence 2020 [CPRPL 2020]  
Proposed Fee Structure.

<b><u>Proposed Licence fee structure</u></b> <b><u>(per dwelling)</u></b>	<b>Total Fee</b>	<b>Part A</b>	<b>Part B</b>
<b>Single dwelling licence</b> <b>(new application)</b>	£350.00	£185.50	£164.50
<b>Single dwelling licence</b> <b>(standard fee)</b>	£750.00	£397.50	£352.50
<b>Multi-let application</b> <b>(&gt;1 dwelling) (new application)</b>	£300.00	£159.00	£141.00
<b>Multi-let application</b> <b>(&gt;1 dwelling) (standard fee)</b>	£650.00	£344.50	£305.50

All licences to be granted for 5 years which may extend post designation.

New application- a discounted fee for new applications received regarding premises who have been previously licenced with CPRPL 2015 OR newly constructed dwellings

£50 additional charge to support applicant with application.

The fee for an Almshouse is £30 (Part A payment only)

<b><u>One Year Licence</u></b> <b><u>fee structure</u></b> <b><u>(per dwelling)</u></b>	<b>Total Fee</b>	<b>Part A</b>	<b>Part B</b>
<b>Single dwelling licence</b> <b>(one year)</b>	£468.00	£397.50	£70.50
<b>Multi-let application</b> <b>(&gt;1 dwelling) (one year)</b>	£405.60	£344.50	£61.10

Granting one year - for when the Council determine a licence for less than 5 years should be granted. Will allow higher levels of monitoring or a licence holder needs time to get his/her property management in order

<b><u>Proposed Temporary</u></b> <b><u>Exemption Notice</u></b> <b><u>fee structure</u></b> <b><u>(per dwelling)</u></b>	<b>Total Fee</b>	<b>Part A</b>	<b>Part B</b>
<b>Single dwelling</b> <b>TEN application</b>	£100	n/a	n/a
<b>Multi-let dwelling licence</b> <b>TEN application</b>	£100	n/a	n/a

**Other fees and charges.**

These fees are applicable as appropriate in relation to licensing applications, or where properties are licensed.

<b><u>Licensed Premises Proposed Licence Variation</u></b>	<b><u>Variation Application Fee</u></b>
Change of address details of any existing licence holder, manager, owner, mortgagor, freeholder, leaseholder etc.	No fee
Change of mortgagor, owner, freeholder, and leaseholder (unless they are also the licence holder or manager)	No fee
Reduction in the number of maximum occupiers and/or households for licensing purposes	No fee
Variation of licence instigated by the council	No fee
Change of licence holder (e.g following sale)	Application fee
Change of manager (unless they are also the licence holder)	No fee
Increase in the number of maximum occupiers and/or households for licensing purposes, through increasing the number of habitable rooms, change in room sizes, and/or amenity provision	No fee

<b><u>Action</u></b>	<b><u>Applicable Fee</u></b>
Revocation of licence	No refund of application fee
Application to licence following revocation of licence	Application fee
Application refused by the council	Part A application fee not refunded
Application withdrawn by the applicant	Part A application fee not refunded
Application made in error and not granted e.g. duplicate or exempt.	No fee, and a refund of the Part A fee will be made.
Properties that cease to be licensable during the licensing process (as when planning permission subsequently refused)	No refund of application fee



Enforcement action under Part 1 of the Housing Act 2004 relating to a licensed property (Charged under The Housing Act 2004, Section 49)	A separate charge for action, currently £650 for notice with additional £100 per hazard.
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## FAQ for CPRPL 2020

### Croydon Private Rented Property Licence 2020 [CPRPL 2020]

#### Frequently asked questions (FAQs)

##### General information.

##### **What is the Croydon Private Rented Property Licence scheme?**

The Croydon Private Rented Property Licence (CPRPL) is a licensing scheme for private rented properties. It applies to all privately rented properties that are not exempt or required to be licensed in a separate scheme as Houses in Multiple Occupation (HMOs).

Part 3 of the Housing Act 2004 gives Councils the power to implement a selective licensing for private rented properties within a designated area. Part 2 covers the Mandatory HMO licensing scheme

##### **Is the CPRPL the same thing as selective licensing?**

Yes, CPRPL is the name for the scheme which is also known as selective licensing. It is shortened to CPRPL 2020.

##### **Why are you introducing it?**

The Council is looking to 'continue' the current scheme. This commenced on the 1<sup>st</sup> October 2015 and lasts for 5 years until the 30<sup>th</sup> September 2020. The Council hopes that CPRPL 2020 will commence on the 1<sup>st</sup> of October 2020. The aims of the CPRPL 2020 are to help raise housing standards, control overcrowding, reduce anti-social behaviour, reduce crime and tackle deprivation across the Borough. By encouraging an improved private rented sector with settled communities Croydon becomes a 'Better Place to Rent'.

##### **Who will it apply to?**

It's a legal requirement for all Croydon landlords (some exemptions apply) to have a licence for each of their privately rented properties. The proposed start date is the 1 October 2020 [This will be the assumed commencement date for the purpose of the FAQ].

##### **What will it cost (a landlord)?**

A CPRPL is £750 per dwelling (discounts apply) paid in two stages; A and B. An application can be made for either a single dwelling or with a property, which comprises more than one dwelling; a multi-let application.

Landlords with multiple rented properties across the Borough must complete an application for each property.

The fee requires two payments; Part A and Part B. The Part A payment is a non-refundable administration fee. The Part B payment is to cover the costs of the enforcement and administration of the CPRPL 2020 designation. It must be paid on request at the point that the Council is ready to issue the property licence.

The HMO scheme has a different fee structure. The fee structure is on the website [here](#). No VAT is charged as part of the fee.

Any reduced fee is subject to eligibility and the terms and conditions of CPRPL 2020.

<b><u>Proposed Licence fee structure (per dwelling)</u></b>	<b>Total Fee</b>	<b>Part A</b>	<b>Part B</b>
<b>Single dwelling licence (new application)</b>	£350.00	£185.50	£164.50
<b>Single dwelling licence (standard fee)</b>	£750.00	£397.50	£352.50
<b>Multi-let application (&gt;1 dwelling) (new application)</b>	£300.00	£159.00	£141.00
<b>Multi-let application (&gt;1 dwelling) (standard fee)</b>	£650.00	£344.50	£305.50

A reduced licence fee for 'new' licence applications is available. To be eligible;

1. The premises must have been licenced under CPRPL 2015 and the new application is identical. The 'new' application must be duly made before the 1<sup>st</sup> October 2020 OR.
2. The premises have been newly constructed (new build or conversion) and a duly made application is made within one calendar month of the first tenancy term commencing. (Tenancy agreement to be uploaded with application)

The reduced fee of £30 for Almshouse applications is retained.

### **What is a Multi-Let property application?**

Some landlords own buildings that are divided into a number of separate dwellings. This can be purpose built or through conversion. The legislation gives the Council discretion to consider an application that is made to have one licence holder for the building containing a number of lets. If accepted the Council will grant a Multi-Let Property Licence. It is still a selective licence. The Council will need to be satisfied that conditions are met and this approach is the best course of action.

Alternatively, the Council may decide that each separate dwelling in the building should have its own licence, a Single Dwelling licence. If the Council is satisfied that Single Dwelling Licences should be granted, it will give notice of this to the licence applicant and other parties. Anyone dissatisfied with this approach has the right to make an appeal.

For the Council to use its discretion to grant a Multi-Let property licence, meeting the following conditions is the first stage of the application assessment:

- Each of the dwellings are separate dwellings (usually self-contained flats), which adjoin one another in the same building; and
- Each of the dwellings are occupied under non "exempt tenancies"; and
- Each of the dwellings are within common ownership and management control.
- Clear responsibility for the CPRPL licensing conditions is achievable.

### **What are the fees for a Multi-Let Property Licence?**

An applicant for a Multi-Let property licence is entitled to a fee that is reduced to reflect the slightly reduced administrative and enforcement costs. A reduction is offered for both the Part A and Part B payment. If the application is not successful the single dwelling licence fee structure is applicable.

### **Are there risks for Multi-let Property Licence Holders?**

A licence cannot be transferred and to remain valid the property management arrangements cannot change. The main risk occurs with the licence covering a greater number of dwellings meaning there is an increased chance of a change which could deem the current licence void. In this situation a new application maybe necessary as a CPRPL cannot be transferred.

### **How long does a licence last?**

Most licences will be issued for a five year period. This may mean the licence is granted for a period that is longer than this 5 year designation. The Council has the discretion to issue a licence for a shorter period of up to 5 years.

### **When can one year licences be issued?**

The Council are aware that not all landlords provide high levels of management or landlords meet the current fit and proper person test. If higher levels of monitoring are needed or a licence holder needs time to get his/ her property management arrangements in place the Council may look to issue a licence for a shorter period; possibly just for one year. A new application would be needed at the end of the one year period and the Council would then make a further assessment.

<b><u>One Year Licence fee structure (per dwelling)</u></b>	<b>Total Fee</b>	<b>Part A</b>	<b>Part B</b>
<b>Single dwelling licence (one year)</b>	£468.00	£397.50	£70.50
<b>Multi-let application (&gt;1 dwelling) (one year)</b>	£405.60	£344.50	£61.10

### **What happens at the end of the period the licence is granted for?**

If a designation is in place you will need to make an application for a new licence. The Council will keep licence holders updated using the website, Landlord Forums and electronic newsletters.

### **Why would an applicant be refused a licence?**

An application for a licence can be refused for a number of reasons. These can include situations where the proposed licence holder does not meet the fit and proper person test or where the proposed management arrangements are not satisfactory. Croydon will look to be more proactive with CPRPL 2020.

## **Application process**

### **When do landlords have to be licensed from?**

It is proposed that CPRPL 2020 commences from the 1<sup>st</sup> October 2020. It is a legal requirement for a property to be licensed from this date.

### **How will you be able to apply?**

Applications can be made apply online from the 1st July 2020 via a link on the Council's website. At this stage it is not known whether past information can be transferable. If you are unable to apply on line an officer can provide support to you with the application. An additional fee of £50 is due as part of the Part A payment.

### **Who can be a licence holder?**

A licence holder can be a single person, a limited company or a small group of people. If a limited company is the proposed licence holder the full company name and UK registered office address is needed along with a listed director who is subject to the assessment including the 'fit and proper person' test.

In addition to a licence holder, a further person can agree to support the licence holder and accept responsibility for ensuring compliance with the property licensing conditions. The further person must have signed a clear 'Declaration of Management' that will need to be submitted as part of the licence application.

Applicants need to be made aware that should the nominated licence holder cease to operate, the existing licence is non-transferable. This means that a new licence will have to be applied and paid for.

### **Who is most suitable to be the Licence Holder?**

The Housing Act 2004 requires the Council to only grant a licence to the most appropriate person. In most circumstances this would be the property owner or the named landlord on the tenancy agreement. Generally the licence holder must;

- Be the person who is responsible for managing and is in control of the property and must be a 'fit and proper' person.
- Be able to authorise, organise and pay for essential repairs to the property.
- Be available to the tenants should problems arise in respect of the property, and must have the means to resolve them where reasonably practical.
- Be able to let and terminate the tenancies;
- Have access to all parts of the premises to the same extent as the owner.

The Council can grant a licence either to the applicant, or to some other person, if both the person and the applicant agree.

### **Where can the Licence Holder live?**

- The Council will accept an application where the licence holder lives in the British Isles.

- A person cannot be a licence holder and live outside of the British Isles unless further arrangements are made for the management of the property. Here, another person or management company, who will sign the Declaration of Management, needs to be appointed.
- The Declaration of Management will allow a third party to consent to the imposition of the restrictions or obligations (conditions) under CPRPL 2020.
- For the purpose of licencing The Council sees The British Isles as the group of islands in the North Atlantic off the north-western coast of continental Europe that consist of the islands of Great Britain, Ireland, the Isle of Man, the Hebrides and over six thousand smaller isles including the islands of Alderney, Jersey, Guernsey, and Sark, and their neighbouring smaller islands.

### **Mortgage Companies (mortgagees).**

The Council requires the application to include details of all interested parties involved in the ownership or management of the property. The Council must inform all parties that a Licence is intended to be granted. An interested party includes the mortgage company who has provided funding for the property. The mortgagor must provide up to date details about the mortgagee (bank / lender). An application is not duly made without this information.

### **Making the assessment to issue a licence.**

For the Council to issue a licence it must be satisfied that the:

- Proposed licence holder and proposed manager (if there is one) is a 'fit and proper person'
- Proposed licence holder is the most appropriate person to hold the licence
- Proposed management arrangements are satisfactory; and
- Persons involved in the management of the house are competent.

The words competent, satisfactory and arrangements are all used to ensure that the property functions. The Council will assess whether management arrangements are satisfactory where a Council debt exists at an address or against a person.

### **What documents and information are needed to apply for a licence?**

As part of a duly made application the Council expects the following documents to be uploaded;

1. Property plan detailing fire safety measures (position of alarms) and room sizes and occupancy rates (crowding).
2. Gas safety certificate (current).
3. Energy performance certificate.
4. Declaration of Management (appointment of other parties to accept responsibility).
5. Tenancy agreement (where new application discount being applied for).

**Is tacit consent provided?**

With regards to the granting or refusing, of an Licence under section 88 of the Housing Act 2004, the Local Housing Authority will aspire to issue a decision following a completed application, within a reasonable period. Not meeting this target will not confirm tacit consent. Unfortunately the Council may not be able to continually update applicants as to the progress of an application towards review.

**Will the property be inspected?**

The Council will prioritise premises for inspection either during the application process or after a licence has been issued. Not all premises will be inspected but licence holders can request an inspection by contacting [SelLicinspection@croydon.gov.uk](mailto:SelLicinspection@croydon.gov.uk) or telephoning 0208 760 5476.

**What happens once my licence is approved?**

Once your application is approved, you will be sent confirmation of your licence which will also include the terms and conditions. We will also sign you up to the Croydon private rented property licence scheme e-newsletters and invite you to landlord forum events. There is also a landlord information pack on line, useful links and previous newsletters and advice sheets all aimed at helping landlords.

**Is a CPRPL transferable to another property or person?**

No, a private rented property licence is non-transferable. A licence applicable granted under CPRPL 2015 will not be valid under CPRPL 2020 because it will have time expired.

**I rent several properties in Croydon - do I need a CPRPL for each one?**

Yes, all privately rented properties in Croydon require an individual licence. An application and fee is to be paid for each dwelling.

**How do I report an unlicensed property?**

Unlicensed properties can be checked and reported [here](#). [link on Croydon website]

**Complaints and Appeal****How can I complain or appeal the decision to refuse a property licence?**

If applicants are dissatisfied with a decision the Council has made regarding their licence, we would recommend they get in touch with us by email [propertylicensing@croydon.gov.uk](mailto:propertylicensing@croydon.gov.uk) or by calling 020 8726 6103 (available Monday – Friday 09:00 – 16:00) to discuss the decision.

Where you are still not happy with the service provided or any decision made Croydon Council has a complaints procedure accessed from its [website](#) [link]

If the Council revokes or refuses a licence application you will receive a revocation or refusal document in writing. At this stage you can appeal to the Residential Property Tribunal within 28 days of the decision being made.

First Tier Tribunal (Property Chamber – Residential Property)

1st Floor 10 Alfred Place

London

WC1E 7LR



Tel: 020 7446 7700  
Fax: 020 7637 1250  
Email: [rplondon@hmcts.gsi.gov.uk](mailto:rplondon@hmcts.gsi.gov.uk) .

### **Enforcement and prosecution**

#### **How are you going to enforce this?**

If CPRPL 2020 commences the Council will look to allocate a high level of resources to seek landlords who have not licensed under the CPRPL 2020. As part of the data collection behind CPRPL 2020 information has been gather to help enforce non-compliance.

Landlords should not expect to receive a warning before full enforcement action is started for licencing offences.

#### **What are the penalties for breaking a licence or not having one?**

Landlords renting out a property without a licence could face prosecution with an unlimited fine from the Court or a fixed penalty up to £30,000. This could result in the landlord licence being refused and the property being required to licensed under the name of an alternative licence holder.

For properties that continue to be unlicensed the Council can make an application for an Interim Management Order which gives the Council the power to take over management of the property and collect the rent.

An unlicensed landlord cannot serve notice to their tenants under section 21 of the Housing Act 1988 because the Courts will deem it invalid under these circumstances. The Council or tenant can make an application to the Residential Property Tribunal for a Rent Repayment Order (RRO) for up to 12 months rental income.

Prosecution for not licensing or providing false or incorrect information can lead to an application for a Landlord to be banned.

### **Inspections**

#### **How will inspections work?**

Licensed private rented properties may be inspected. The Council will look to implement a variety of approaches to enforce the scheme. This will include a self-declaration approach as well as property inspections. The Council will look to prioritise resources.

#### **How long will each inspection take?**

A licence holder will be normally given warning about a CPRPL 2020 inspection. This is normally 10 days. This will give time for documents to be submitted to the Council. Depending on the size and condition of the property, the inspection could take 30 minutes.

#### **What are the penalties for a breach in Licence Condition?**

The Council expect landlords to be proactive with complying with property conditions. If there is a breach the licence holder could face prosecution with an unlimited fine from the

Court or a fixed penalty up to £30,000. This action could impact on the fit and proper person definition and ability to hold a landlord licence.

### **Other information about CPRPL 2020.**

#### **Can someone complete the application on my behalf?**

Yes. The application can be completed by the proposed licence holder, the letting or managing agent or a third party on behalf of the agent or owner.

#### **Providing inaccurate information on a licence application.**

Under section 238 of the Housing Act 2004 it is an offence to provide false or misleading information. An applicant needs to be sure the information provided in an application (including a declaration about the fit and proper person declaration) is true.

#### **Fit and proper assessment. What is the 'fit and proper' assessment the licence holder and managers have to go through?**

Under the Housing Act 2004, licence holders and managers must be 'fit and proper' persons in order to undertake the responsibilities of managing a private rented property. The Council has to assess whether proposed licence holders (including director or partner in a company or organisation) are 'fit and proper' persons to hold a CPRPL.

To be fit and proper the Council expects the person to have no serious record of poor management or an outstanding criminal charge (unspent) that is inconsistent with operating as a landlord.

To assist the Council in making proper assessments of suitability, details about previous criminal convictions must be disclosed in the application. The applicant and proposed licence holder provides a signed declaration. Any incorrect or false information given this will be investigated as a possible offence under section 328 of the Housing Act 2004

If the licence holder or other person is convicted of any relevant offence(s) during the licence period the Council must be notified immediately.

If the licence holder or manager fails the fit and proper test, your application may be refused or revoked and the licence application fee will not be refunded.

#### **At what times am I entitled to a refund (refer to fee structure)?**

Refunds **will** be issued if:

- You have made a duplicate application
- You made an application for an exempted property by mistake.

Refunds **will not** be issued if:

- We refuse your application
- You withdraw your application
- We revoke (take away) your licence (after it has been granted)
- You are refused planning permission for a non-mandatory licence.
- You sell your property, stop letting it or cancel your licence.
- A new licence holder is appointed.

### **Are there any properties that are exempt from licensing?**

There are some properties that are exempt from licensing, however they must fall into one of the following categories;

- The property is an HMO that already requires a licence under a mandatory HMO or additional licensing scheme;
- The tenancy or licence has been granted by a registered social landlord under Part I of the Housing Act 1996.
- The property is subject to an Interim or Final Management Order under Part 4 of the Housing Act 2004 (i.e. the Council have taken over the management of the property);
- The property is covered by a temporary exemption notice; or
- The property is occupied under an exempt tenancy or licence, as defined in the *Selective Licensing of Houses (Specified Exemptions) (England) Order 2006*.

Examples include:

- Any property subject to a Housing Act 2004 prohibition order;
- Certain tenancies associated with business premises, Licensing Act 2003 premises, agricultural land or agricultural holdings;
- Buildings managed by a local housing authority, police or fire & rescue authority or a health service body;
- Buildings already regulated under certain other statutory provisions (Schedule 1 to SI 2006 Number 373)
- Certain student halls of residence;
- Holiday homes; and
- Buildings let to a member of the landlords family or where an occupant shares any accommodation with the landlord or a member of the landlord's family. (with sufficient lodges this may become an HMO).

The Council does not view properties let to property guardians as exempt from the licensing regime.

### **When can I apply for a Temporary Exemption Notice?**

If you have a licensable property and you are in the process of making it non-licensable you can apply for a Temporary Exemption Notice. Selling the property is one example. The Council can grant you a notice (TEN) for a maximum of 3 months. In circumstances you may be granted a second TEN. You cannot apply for a third TEN.

In making a decision about whether to grant a TEN the Council will consider the period (if any) that the property has been licensable for. A TEN will not be granted where the property has been rented for a long period.

<b><u>Proposed Temporary Exemption Notice fee structure (per dwelling)</u></b>	<b>Total Fee</b>	<b>Part A</b>	<b>Part B</b>
<b>Single dwelling TEN application</b>	£100	n/a	n/a
<b>Multi-let dwelling licence TEN application</b>	£100	n/a	n/a

If the property remains licensable, you need to tell the prospective purchaser that they have to apply for a licence in their own name.

### **What documents and information are needed to apply for a licence?**

The Council is considering allowing licence holders to store licensing condition documentation on the *Croydon my account* site. This is to assist the Council with the application process and also the enforcement of the CPRPL 2020 scheme.

It is also being considered whether the Council writes to the licence holders at the expiration of the gas safety certificate to request new documentation.

Where a CPRPL 2020 property inspection is scheduled the licence holder is requested to supply the Council with the following documentation.

1. Property plan detailing fire safety measures (position of alarms) and room sizes and occupancy rates (crowding).
2. With Multi-Let licences a fire risk assessment and other fire safety measure certification (emergency lighting, sprinklers)
3. Gas safety certificate.
4. Electrical appliance(s) test certificate or declaration.
5. Declaration that the furniture and furnishings meets safety standards
6. Tenant's written statement of the terms (tenancy agreement)
7. Tenant's reference(s)
8. Statutory tenancy deposit scheme receipts / prescribed information
9. Periodic Electrical Inspection Condition report (where available).
10. Energy Performance Certificate (EPC)
11. Property inspection record (6 month frequency)
12. Tenancy management arrangements (ASB) and log of activity.
13. Tenant's information sheet: covering waste, recycling, storage and collection.
14. Declaration of Management (appointment of other persons to accept responsibility).

## Equality Analysis Form

### 1. Introduction

#### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

### 2. Proposed change

<b>Directorate</b>	<b>Place</b>
<b>Title of proposed change</b>	<b>Renewal of Selective Licensing Scheme for Croydon</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Martin Davies</b>

#### 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

**The renewal of the current Selective Licensing Scheme which commenced in October 2015 for a fixed term of 5 years is an important protection for vulnerable tenants in that it improves living and environmental conditions, provides enhanced protection against retaliatory eviction, signposting to other services, and joint working with other enforcement agencies to deal with crime and anti-social behaviour.**

**3. Impact of the proposed change**

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

**3.1 Deciding whether the potential impact is positive or negative**

**Table 1 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	Relevant to all groups in that protection from unlawful discrimination is built into the Selective Licencing conditions. Improves living and environmental conditions, provides enhanced protection against retaliatory eviction, signposting to other services, and joint working with other enforcement agencies to deal with crime and anti-social behaviour.	There is no reason to believe that the protected groups will be at any greater risk than the rest of the population	Experience of current scheme. Inspectors talk to tenants and there are specific questions about health and anti-social behaviour.
Disability			
Gender			
Gender Reassignment			
Marriage or Civil Partnership			
Religion or belief			
Race			
Sexual Orientation			
Pregnancy or Maternity			

**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

**Key**

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low



# Equality Analysis

Table 3 – Impact scores

<p>Column 1</p> <p><b>PROTECTED GROUP</b></p>	<p>Column 2</p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p>Column 3</p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p>Column 4</p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	1	1	1
Disability			
Gender			
Gender reassignment			
Marriage / Civil Partnership			
Race			
Religion or belief			
Sexual Orientation			
Pregnancy or Maternity			

# Equality Analysis

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council’s ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council’s ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				

# Equality Analysis

Marriage/civil partnership			
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**6. Decision on the proposed change**

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p><b>Selective licensing protects all vulnerable tenants. It would be a serious breach of licencing conditions if a landlord were to discriminate against any of the protected groups. Landlords who have been convicted of a discriminatory offence cannot receive a licence. Selective licensing provides additional safeguards because of the joint-working arrangements and signposting which are built into the scheme.</b></p>	<b>X</b>
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></p>	
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the 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. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b></p>	
Stop or amend the proposed change	<p>Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.</p>	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Date: 21 <sup>st</sup> October 2019

# Equality Analysis

## 7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Yvonne Okiyo	Date: 20.9.19
Director	Position: Equalities Manager	Name: Date:

<b>REPORT TO:</b>	<b>CABINET 21 October, 2019</b>
<b>SUBJECT:</b>	<b>Presentation: Celebrating and supporting Croydon's BAME residents</b>
<b>LEAD OFFICER:</b>	<b>Hazel Simmonds, Executive Director, Gateway, Strategy and Engagement</b> <b>Gavin Handford, Director, Policy and Partnerships</b>
<b>CABINET MEMBER:</b>	<b>Councillor Tony Newman, Leader of the Council</b> <b>Councillor Hamida Ali</b>
<b>WARDS:</b>	All
<p><b>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</b></p> <p>The support and celebration of Croydon's Black, Asian, and Ethnic Minority (BAME) residents is an integral part of the Corporate Plan across all priorities.</p> <p><a href="#">Corporate Plan for Croydon 2018-2022</a></p>	

## **FINANCIAL IMPACT**

There are no financial implications arising from this report and presentation.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

### **1. RECOMMENDATIONS**

The Cabinet is recommended to

- 1.1 Note the information in the report and presentation (appendix A).

### **2. EXECUTIVE SUMMARY**

- 2.1 As the council's BAME Champion, Cllr Patsy Cummings is bringing a presentation to Cabinet, that publically recognises the council's celebration and support of Croydon's BAME population.

### **3. CONTEXT**

- 3.1 Croydon is rightly proud of it's tremendously diverse and vibrant population. GLA ethnic group projections for 2018 showed that 51.7% of Croydon residents

identify as Black, Asian, or Minority Ethnic (BAME). Over 100 languages are spoken in the borough, with 82.6% of residents having English as their main language.

3.2 The work of the council and its partners in celebration and support of BAME communities can be categorised as follows:

- Advice and support
- Events
- Community Engagement
- Grants and Awards

3.3 All activities of the council focus on delivering the best possible outcomes for residents – regardless of ethnicity. In the financial year 2018/19 the council spent approximately £870,000 of Ward budgets, Community Grants, Cultural Fund, and the Croydon Community Fund on specific activities that delivered outcomes to support and celebrate Croydon's BAME communities, with the 2019/20 estimate sitting around £950,000.

3.4 This work is only possible with the support and collaboration of a wide range of community and voluntary sector organisations, as well as our residents themselves.

#### **4. BLACK HISTORY MONTH**

4.1 October is Black History Month. Black History Month was first celebrated in the United Kingdom in 1987. It was organised through the leadership of Ghanaian analyst Akyaaba Addai-Sebo, who had served as a coordinator of special projects for the Greater London Council (GLC) and created a collaboration to get it underway.

4.2 The presentation that this report accompanies includes an overview of the activities that are taking place across the borough this month to mark and celebrate Black History Month.

#### **5. PRESENTATION OVERVIEW**

5.1 The presentation highlights the work done in the following areas:

- Windrush: <https://croydonwindrush.org/>
  - Those arriving in the UK between 1948 and 1971 from Caribbean countries have been labelled the Windrush generation.
  - This is a reference to the ship MV Empire Windrush, which arrived at Tilbury Docks, Essex, on 22 June 1948, bringing workers from Jamaica, Trinidad and Tobago and other islands, as a response to post-war labour shortages in the UK.
  - In 2018 Croydon became the first local authority in the country to establish and celebrate an annual Windrush Day in recognition of the rich diversity Commonwealth citizens have brought to the borough.

- The council have also passed a motion which includes reviewing council policies and procedures to ensure support for Windrush residents affected by national policies.
- Black History Month
  - [www.croydon.gov.uk/ccbh](http://www.croydon.gov.uk/ccbh) (live from 13.09.19)
- Mela:
  - <https://www.croydonmela.com/>
- Interfaith Bike Ride
  - An event that celebrates the various faith groups in the borough, bringing residents together for the common good, uniting to build a better society, grounded in shared values and ideas.
- The Employers Network for Equality & Inclusion Awards
  - <https://www.enei.org.uk/>
- Talawa Theatre Company and Fairfield Halls
  - <http://www.talawa.com/articles/talawa-comes-to-croydon>
- Operation Black Vote
  - <https://www.obv.org.uk/>
- Hate Crime – awareness and prevention
  - <https://www.croydon.gov.uk/community/safercroydon/advice-information/hatecrime>
- Female Genital Mutilation – awareness and prevention
  - <http://news.croydon.gov.uk/croydon-helps-lead-fight-end-fgm/>
- Supporting the voluntary and community sector
  - Croydon BME Forum
    - <http://www.cbmeforum.org/>
  - Asian Resource Centre Croydon
    - <https://www.arccltd.com/>
- Examples of Community Grant funding
  - Croydon FC: Refugee project
  - Spandan: Multicultural welfare events
  - Somali Girls Can: Sport for change

## **6. CONSULTATION**

- 6.1 As this report introduces a presentation to cabinet, a consultation is not required.
- 6.2 Where appropriate resident and/or partner engagement has been part of the process to deliver the initiatives detailed in Appendix A (the presentation).

## **7 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 7.1 There are no direct financial implications arising from this report.

Approved by Lisa Taylor, Director of Finance, Investment and Risk, S151 Officer.

## **8. LEGAL CONSIDERATIONS**

- 8.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that there are no direct legal implications arising from the recommendations in this report. Any legal implications arising in relation to individual actions have been, and will continue to be dealt with as projects and decisions come forward for approval.

Approved by Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Law & Governance and Deputy Monitoring Officer.

## **9. HUMAN RESOURCES IMPACT**

- 9.1 There are no direct impacts on the LBC workforce arising from this report. However the positive work is noted and the related opportunities to build our employer brand and support our ambition to have a workforce that is reflective of its community.

Approved by Sue Moorman, Director of Human Resources.

## **10. EQUALITIES IMPACT**

- 10.1 There is no significant/direct negative impact on groups that share a protected characteristic as a result of the presentation that this report introduces. The report and accompanying presentation highlight the positive impact of activities/projects to support BAME residents across the borough.
- 10.2 Any significant equalities impact arising in relation to individual actions have been, and will continue to be addressed as projects and decisions come forward for approval. All projects and decisions require their own, individual equalities analysis to ensure consideration is given as to whether the decision(s) will have a disproportionate impact on people that share one or more protected characteristics, mitigating actions are put in place, and the Council is meeting the public sector equality duty.

Approved by Yvonne Okiyo, Equalities Manager

## **11. ENVIRONMENTAL IMPACT**

- 11.1 There is no environmental impact arising directly from this report.

## **12. CRIME AND DISORDER REDUCTION IMPACT**

- 12.1 There is no specific crime and disorder impact arising from this report.



**13. OPTIONS CONSIDERED AND REJECTED**

13.1 There are no options for consideration, this report is for information only.

**14. DATA PROTECTION IMPLICATIONS**

**14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

14.2 No

14.3 The Director of Policy and Partnerships comments that as the subject of this report does not involve the processing of personal data, a data privacy impact assessment is not required.

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<b>CONTACT OFFICER:</b>	Laura Jones, Senior Project Manager, Policy and Partnerships
<b>APPENDICES TO THIS REPORT:</b>	Appendix A: Celebrating and Supporting Croydon's BAME residents – presentation
<b>BACKGROUND DOCUMENTS:</b>	None

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# Appendix A: Celebrating and supporting Croydon's BAME residents

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October, 2019



Croydon's celebration of the Windrush Generation got underway with a special exhibition of artefacts, memories and stories in the Croydon Museum, launched in June.

The free exhibition runs until Thursday 31 October, and has been enjoyed by close to 2,500 residents so far.

Earlier this year the council passed a motion which included reviewing council policies and procedures to ensure support for Windrush residents who have been affected by national policy.

Events have taken place to give residents the chance to understand more about the issues concerning the immigration status of UK residents who arrived in Britain as part of the Windrush generation, and what is being done to combat it.

A year long programme of events celebrates the tremendous contribution this community has made to Croydon and the rest of the UK, for more details visit: <https://croydonwindrush.org/>

# Windrush



Supporting this year's theme of "Rid the stigma" Croydon Council are hosting a schedule of events that includes:

- Bollywood dance
- Family Tree/Tracing Black Ancestry
- Visit to the House of Commons
- Black History Crafternoon
- Spoken Word and Poetry
- Hidden Histories of Black Women
- African Drumming
- BlackPoppyRose (WW2 experiences)
- Caribbean Experience
- Soul Vegan Supper Club



For more details visit: [www.croydon.gov.uk/ccbh](http://www.croydon.gov.uk/ccbh)

## Black History Month



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An estimated 12,000 people headed to Croydon Mela for a colourful celebration of Asian culture, with music, dance, food, family fun and entertainment.

Co-produced by Croydon Council and Apsara Arts, and for the first time programmed by an all female crew from Croydon – Chetna Kapacee, Anusha Subramanyam and Malti Patel – the event showcased local talent on the Dance Dhamaka stage and Rung Mela Zone.

Headliners on the main stage included Apache Indian, DJ Ritu and Najma Akhtar alongside local groups.

# Mela

In June, Faiths Together in Croydon (FTIC) hosted Croydon's fifth annual interfaith bike ride and picnic to show that #WeStandTogether.

Over 200 residents and visitors signed up to one of two bike rides, or simply came along and enjoyed a fabulous picnic provided by the Croydon Muslim Association, Asian Resource Centre Croydon and Croydon Seventh Day Adventists.



## Interfaith bike ride



Croydon Council were highly commended in the representative workforce category at the 2019 ENEI awards.

In particular, this achievement recognises the work of our women's development and BAME aspiring managers programmes.

As of 2018:

- 75 BAME aspiring managers and 71 women completed these programmes
- 33.67% of the BAME group and 32% of the female participants have achieved career progression in the council since taking part



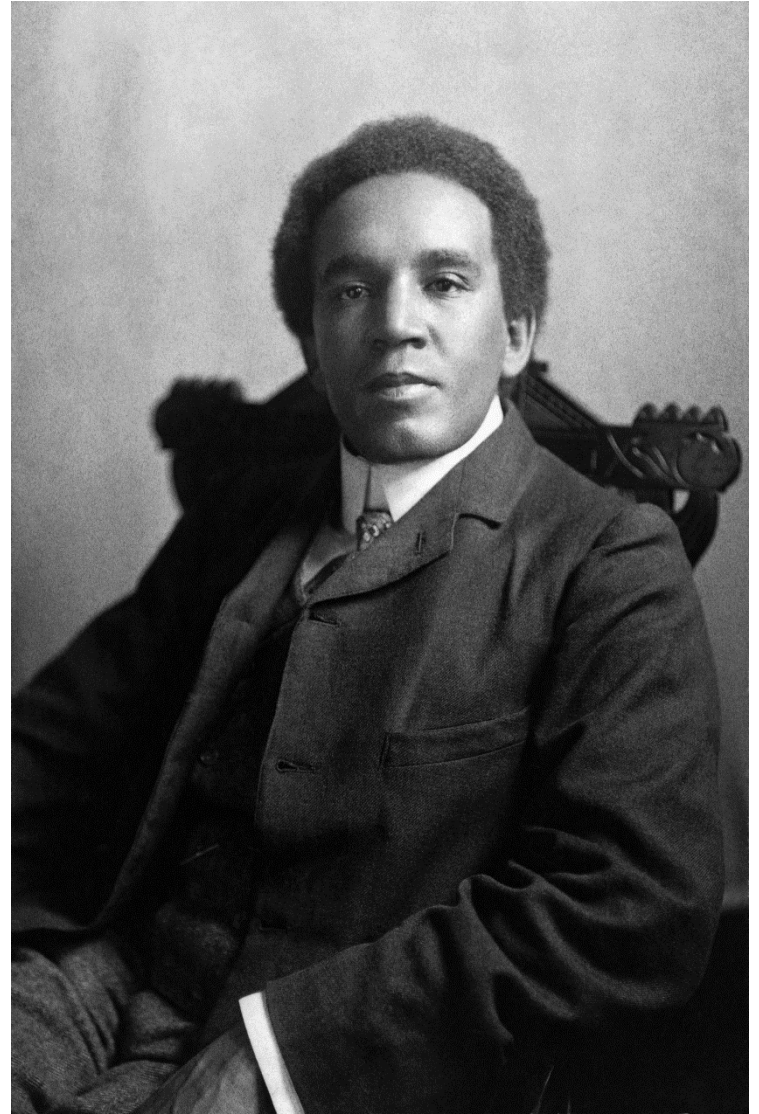
**Croydon Council ENEI highly recommended  
– representative workforce**

# Fairfield Halls

October, 2019

Fairfield Halls' Ashcroft Room will be renamed the Samuel Coleridge Taylor Suite, after the English composer (1875 – 1912).

Samuel lived most of his life in Croydon before his untimely death, aged 37.



## The Samuel Coleridge-Taylor Suite



Talawa Theatre Company takes up residence within Fairfield Halls in Croydon in mid-September 2019. The new space gives the UK's primary Black theatre company a 200 seat studio and offices for the first time since 1995.

The Talawa Studio will operate as a central hub for Black British artists, enabling Talawa to develop a community outreach programme, develop new work, and create and premiere new Black theatre.

## Talawa Theatre Company



Chineke! Orchestra is an 'Orchestra in Partnership' at Fairfield Halls.

Founded by musician Chi-chi Nwanoku OBE in 2015 Chineke! Orchestra is the first professional orchestra in Europe to be made up of majority black and minority ethnic musicians.

Chineke!'s sister ensemble, The Chineke! Junior Orchestra, with players aged 11-22 years old, will also be performing at the venue during the Croydon Youth Arts Takeover in November

## Chineke! Orchestra

In July the council, police and partners launched an anti-hate crime pledge.

To date, over 6,000 people have signed up to the pledge which affirms:

**Together, we want to...**

- raise awareness of hate crimes
- encourage more people to take a stand against them
- encourage everyone to report hate crimes
- signpost to the support that's available for victims



The council also coordinates a Hate Crime Awareness Week that sees a diverse range of activities led by Councillors, young people, and guest speakers

# Hate Crime



Female Genital Mutilation (FGM) is an illegal practice, a form of violence against women and girls, a form of child abuse and a violation of human rights. It is estimated that FGM affects approximately 1% of females in Croydon and 3% of maternities in Croydon.

The fight against FGM is key priority for both the Safer Croydon Partnership and the Croydon Safeguarding Children Partnership

Earlier this year the Council appointed their first specialist social worker to lead its preventative work against FGM.

Their work will primarily focus on helping those who have undergone FGM, and supporting those living in fear of this crime.

The social worker will also engage with residents, providing guidance and advice by working closely with community groups across the borough.

Croydon will also host a FGM conference later this year.

**“Croydon leads the fight against FGM”**



Croydon Council works in partnership with Operation Black Vote to deliver a Civil Leadership programme which is aimed at encouraging young Black Minority Ethnic (BME) residents in Croydon to participate in a career of politics/civic leadership.

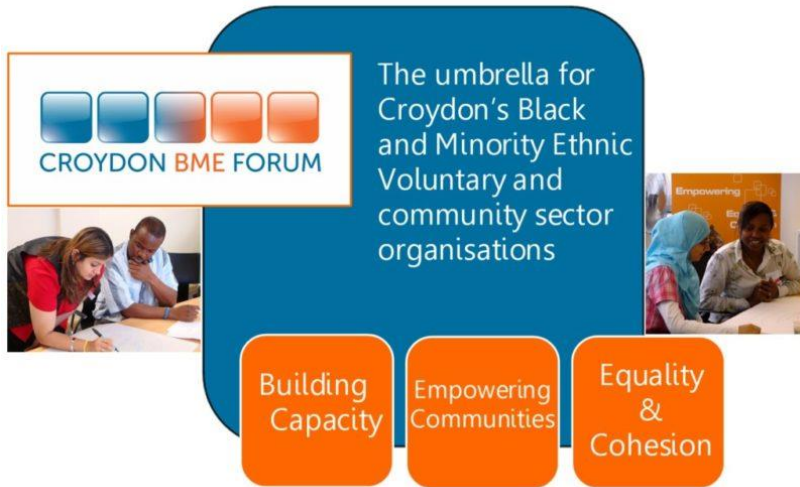
## Participation in Operation Black Vote



# Supporting the Voluntary and Community Sector

Page 185

October, 2019



The Croydon BME Forum receives two awards from the Community Fund – one of £60,000 to deliver capacity building and direct support to empower BME voluntary and community sector.

The second of £169,500 to help fund a project delivered in partnership with Diabetes UK Croydon.

The Asian Resource Centre received £470,000 via the Croydon Community Fund in order to support their work.

Their mission is to support, develop and promote voluntary/community activity that enhances the quality of life in Croydon, creating and supporting an inclusive vibrant and sustainable voluntary and community sector that enhances local quality of life.

# Examples of Community Grant funding



Awarded £1,000 from Croydon Community Grants, this project gives refugees an opportunity to socialise, learn a new language and take part in free football sessions every Friday evening at Croydon FC. This will run for 3 hours a week.

## Croydon FC: Refugee project

Spandan strive to connect the Indian diaspora to its cultural roots by promotion of major Indian festivals in Croydon and organises four major events annually (Saraswati puja, Holi, Durga Puja and Diwali).

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With the £2,000 awarded to them from the Community Grants, Spandan will expand their activities to include contribution to food banks, Christmas gifting for senior citizens, and digital enablement for the socially isolated.

## **Spandan (Croydon Bengali Association): Multi-cultural welfare events**

Somali Girls Can were awarded £1,285 from the Community Grants to deliver regular structured sports for groups of 30 Somali young people aged 18-25.

They also run two different mentoring groups for these young Somalian girls.



**Somali Girls Can: Sport for change**



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<b>REPORT TO:</b>	<b>Cabinet 21st October 2019</b>
<b>SUBJECT:</b>	<b>Section 75 Partnership Agreement for Public Health Nursing</b>
<b>LEAD OFFICERS:</b>	<b>Robert Henderson</b> <b>Executive Director Children Families and Education</b>  <b>Rachel Flowers</b> <b>Director of Public Health</b>
<b>CABINET MEMBER:</b>	<b>Councillor Alisa Flemming</b> <b>Cabinet Member for Children, Young People and Learning</b>  <b>Councillor Simon Hall</b> <b>Cabinet Member for Finance and Resources</b>
<b>WARDS:</b>	<b>All</b>
<p><b>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON</b></p> <p>The proposed approach seeks to support the successful achievement of the following outcomes of the Councils Corporate Plan 2018-2022;</p> <p><b>People live long, healthy, happy and independent lives</b></p> <ul style="list-style-type: none"> <li>• Croydon becomes a more equal place.</li> <li>• Happy, healthy and independent lives are lived by as many as possible, for as long as possible.</li> <li>• Access to effective health services and care services when needed.</li> </ul> <p><b>Our children and young people thrive and reach their full potential</b></p> <ul style="list-style-type: none"> <li>• Children and young people in Croydon are safe, healthy and happy, and aspire to be the best they can be.</li> <li>• Every child and young person can access high quality education and youth facilities.</li> </ul> <p><i>“We know that it is not enough simply to help children and young people when they need us; we must work differently with our families and communities in order that our young people feel safe and lead happy, healthy independent lives wherever possible. By bringing services closer to children and families who need them, building alliances across partners and providers in localities, we will intervene at an earlier stage and address issues before they become problems. The first step will be to deliver a joint approach to early help and family support alongside schools, health services, the police and voluntary organisations, to build resilience, and ensure more children and young people are safe”.</i></p> <p><b>Everyone feels safer in their street, neighbourhood and home</b></p> <ul style="list-style-type: none"> <li>• Further develop services that support survivors of domestic and sexual violence, and disrupt the most prolific offenders.</li> </ul>	

## **FINANCIAL IMPACT**

To enter into a new Section 75 Agreement for Public Health Nursing (comprising Health Visiting, School Nursing, and the Family Nurse Partnership) with Croydon Health Services NHS Trust (CHS) for the period 1 April 2020 to 31 March 2027, at a cost of £5,857,000 per year, equating to a life time value of £40,999,000.

The length of the agreement will align with the remaining period for the One Croydon Alliance contract, of which CHS is one of the partners and who will deliver the service.

The contract will be let for a maximum period of 7 years, with an initial term of 3 years with options to extend for a further periods of 2 years plus 2 years at the discretion of the Council

If the Public Health Grant to Croydon is reduced, all commissioning related to this grant would need to be reviewed. This would include the overall financial envelope with CHS. Decisions would need to be taken at this time as to the most appropriate areas for funding reduction and changes to levels of service activity as required. The contract will need to have the ability to be flexed, should funding levels change.

## **FORWARD PLAN KEY DECISION REFERENCE NO: 1819CAB**

This is a Key Decision as defined in the council's constitution. The decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee by the requisite number of councillors.

The Leader of the Council has delegated to the *Cabinet* the power to make the decisions set out in the recommendations below

### **1. RECOMMENDATIONS**

- 1.1 The Cabinet is recommended by the Contracts and Commissioning Board to approve the award of a Section 75 Agreement in accordance with Regulation 28.4(c) of the Council's Contracts and Tenders Regulations for Public Health Nursing to Croydon Health Services NHS Trust (CHS) for a contract term of 3 years commencing 1 April 2020 plus 2 + 2 years extension periods for a maximum contract value of £40,999,000 (includes the extension periods).
- 1.2 The Cabinet is to note that the Director of Commissioning and Procurement has approved the waiver under Regulation 19 of the Councils Tenders and Contracts Regulations to allow the direct award without prior submission of a procurement strategy of these services to CHS for reasons set out in this report.

## **2 EXECUTIVE SUMMARY**

- 2.1 The purpose of this report is to seek permission to award a contract via a Section 75 Agreement under the NHS Act 2006 to CHS to deliver the Public

Health Nursing service which delivers the Healthy Child Programme 0-19 years for the period 1 April 2020 to 31 March 2027.

- 2.2 Local Authorities inherited responsibility for commissioning the Healthy Child Programme 5-19 (School Nursing) in April 2013, and subsequently 0-5 years (Health Visiting and Family Nursing Partnership) in October 2015, the funding associated with these services are contained within the Public Health Grant. The maximum cost of the service over 7 years is £40,999,000, with the proposal being that the contract is let as 3 years + 2 years + 2 years. Funding for the service will be met from the Public Health budget
- 2.3 To date the Healthy Child Programme has been delivered by CHS, via three separate Section 75 agreements. The current contract periods ran from April 2016 to March 2018, and were subsequently extended on an annual basis, for a further two years (2018/19 and 2019/20). The contract will finish on 31 March 2020.
- 2.4 Commissioners in conjunction with the service have developed a new model of delivery which will offer synergy with the Council's Better Start in Life, Early Help and the Children's Improvement Journey programmes. The ambition is a sustainable and comprehensive early help and prevention offer focusing on addressing needs at the earliest point.
- 2.5 The Healthy Child Programme has a statutory duty to deliver the following services to all families in Croydon;
  - National Child Measurement Programme
  - Vision Screening
  - Antenatal health promotion
  - New baby health visit
  - 6-8 week health assessment
  - 1 year health review
  - 2-2½ year health review
- 2.6 Funding for Public Health Nursing has remained unchanged since 2016, at which time Croydon's spend was approximately £150 per head (preschool children) compared to the average across London boroughs of £217 per head. An additional £2.4 million per annum investment would be required for Croydon to achieve parity with the 2016 London average.
- 2.7 Alignment of services with the Council's Best Start in Life and Early Help programmes has commenced and is being driven by the Head of Public Health Nursing since appointment in March 2019. This has already delivered change to frontline service delivery, with greater numbers of families accessing services during Quarter 1 2019/20. The Head of Public Health Nursing has become an active member of the Best Start in Life and Early Help steering groups, working closely with the Head of Early Help to proactively deliver a more nuanced approach across the six localities taking account of the information available through the locality profiles developed by the council.

- 2.8 The content of this report has been endorsed by the Contracts and Commissioning Board.

CCB ref. number	CCB Approval Date
CCB1514/19-20	23/09/2019

### 3. DETAIL

#### Background Information

- 3.1 There are three elements to the Public Health Nursing Contract – Health Visiting, Family Nurse Partnership and School Nursing.

#### Health Visiting

- 3.2 Good health, wellbeing and resilience are vital for all our children now and for the future of society. There is firm evidence about what is important to achieve this through robust children and young people’s public health<sup>1</sup>.
- 3.3 The programme of work delivered by Health Visiting offers every family screening tests, immunisations, developmental reviews and information and guidance relevant to young families. These services support effective parenting and healthy choices that enhance health and wellbeing.<sup>2</sup>
- 3.4 Pregnancy and the first years of life are the most important stages in the life cycle for child development. This is when the foundations of future health and wellbeing are laid down and this is a time when parents are particularly receptive to learning and making changes. There is strong evidence that the outcomes for both children and adults are strongly influenced by the factors that operate during pregnancy and the first years of life. Neurological development and the impact of stress during pregnancy, and further recognition of the importance of attachment, all make early intervention and prevention an imperative (Centre on the Developing Child, 2007)<sup>3</sup>.
- 3.5 A large proportion of the funding for public health nursing is focused on delivery of health visiting activity, with approximately 60 full-time staff

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<sup>1</sup> Best start in life and beyond: Improving public health outcomes for children, young people and families Guidance to support the commissioning of the Healthy Child Programme 0-19: Health visiting and school nursing services Commissioning Guide 1 Background Information on commissioning and service model revised March2018

<sup>2</sup> Health Child Programme Pregnancy and the first five years of life, Dr Sheila, Shribman, Kate Billingham, Published 27 October 2009.

<sup>3</sup> Health Child Programme Pregnancy and the first five years of life, Dr Sheila, Shribman, Kate Billingham, Published 27 October 2009.

supporting around 30,000 children aged under 5 years. For 2019/20 this is approximately £4,203,933.

3.6 The Health Visiting Service is based on the 4-5-6 model (see figure 1) which is

4 Levels of service:

- i. Community
- ii. Universal
- iii. Universal Plus
- iv. Universal Partnership Plus

5 Universal health reviews

- i. Antenatal
- ii. New baby
- iii. 6-8 weeks
- iv. 1 year
- v. 2-2½ years

6 High impact areas:

- i. Transition to parenthood
- ii. Maternal mental health
- iii. Breastfeeding
- iv. Healthy weight
- v. Managing minor illness & accident prevention
- vi. Healthy 2 year olds & School readiness

### **Family Nurse Partnership**

3.7 As part of the framework for prevention and early intervention Croydon invests in the evidence-based Family Nurse Partnership programme, as an enhancement of the Health Visiting service. Families are partnered with a specially trained family nurse, who visits them regularly, from early pregnancy until their child is two<sup>4</sup>. The focus is on the most vulnerable first time parents including teenagers and care leavers providing intensive and structured home visits. Helps to identify and manage safeguarding issues quickly and effectively

3.8 FNP is a preventive programme and has the potential to transform the life chances of the most disadvantaged children and families in Croydon, helping to improve social mobility and break the cycle of intergenerational disadvantage. Health in pregnancy, and the quality of the care babies receive during the first years of life have a long lasting impact on a child's future health, happiness, relationships and achievement.

3.9 In the financial year 2019/20 funding for the Family Nurse Partnership is £529,847 and will support approximately 120 vulnerable young parents and their children.

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<sup>4</sup> <http://www.fnp.nhs.uk/about-us/the-programm> accessed on 3 July 2019

## School Nursing

- 3.10 School nurses support children and young people aged 5-19 attending school in the local authority area. The service is responsible for child health surveillance, health promotion, health protection, health improvement and support.
- 3.11 Health visitors and school nurses use strength-based approaches to build non-dependent relationships with children, young people and families. This approach supports behaviour change, promotes health protection and helps to keep children safe. Health Visiting and Family Nurse Partnership is the only workforce that has the opportunity to engage with all families in their own homes. This is essential for early identification of need and interventions which mitigate against problems worsening over time.
- 3.12 School Nursing is also based on the 4-5-6 model (figure 1)
- 4 Levels of service
    - i. Community
    - ii. Universal
    - iii. Universal Plus
    - iv. Universal Partnership Plus
  - 5 Universal reviews
    - i. 4-5 year old health needs assessment
    - ii. 10-11 year old health needs assessment
    - iii. 12-13 year old health needs assessment
    - iv. School leavers – post 16
    - v. Transition to adult services
  - 6 High impact areas
    - i. Resilience and wellbeing
    - ii. Keeping safe
    - iii. Healthy lifestyles
    - iv. Maximising learning and achievement
    - v. Supporting complex and additional health and wellbeing needs
    - vi. Transition
- 3.13 School Nursing services are provided by approximately 11.51 whole time equivalent staff delivering to over 100 local schools. For the financial year 2019/20 funding is £1,123,220.
- 3.14 In the new contract school nursing will play an active role in providing a service to those children who are home schooled.

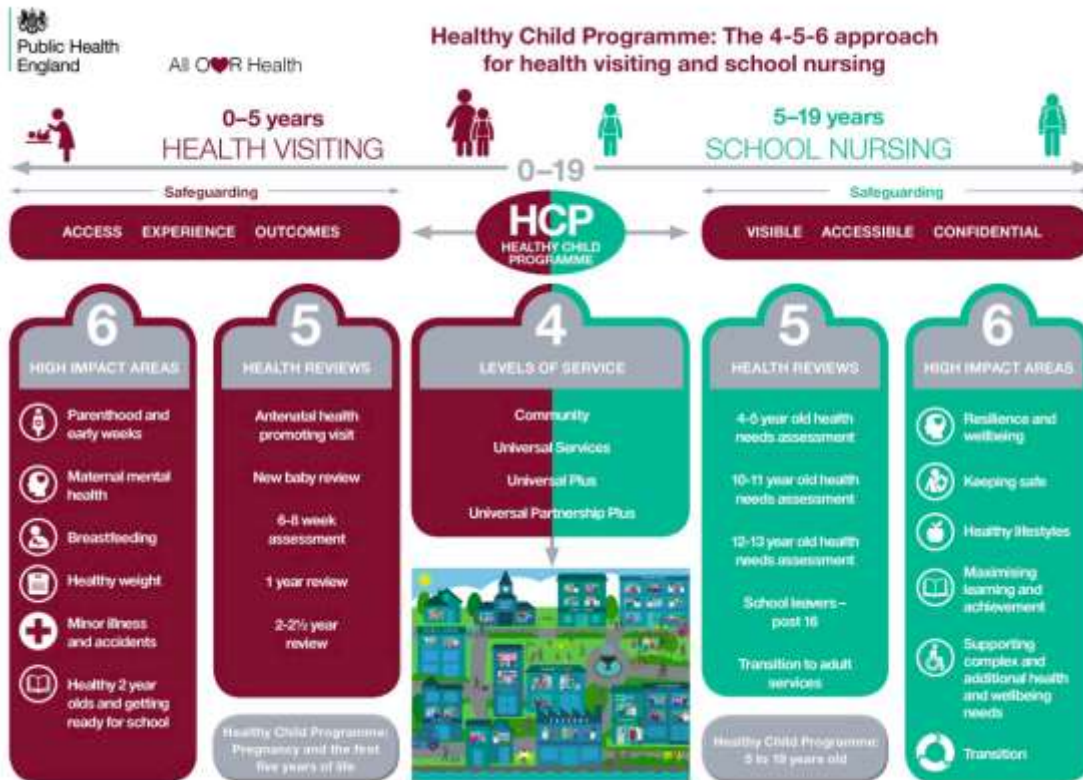


Figure 1: Healthy Child Programme: The 4-5-6 approach for health visiting and school nursing

## Contract Award and Value

3.15 The Contract will be awarded to CHS through a Section 75 Agreement for the following reasons:

(a) Award of Contract to Croydon Health Service NHS Trust (CHS)

CHS is a member of One Croydon Alliance and a trusted partner of Croydon Council. The service is working closely with children's social care to deliver a more coordinated approach to early help services, with a focus on locality working and targeting resources in ways that reach those with the greatest need.

The drive towards more integrated health and social care for children and young people will require an ongoing commitment from all partners, and the public health nursing service is a critical component of the future design. Continuing to work with a trusted partner is an important element of our long-term success in achieving truly integrated, high quality service.

(b) Section 75 Agreement

Powers provided to local authorities and NHS bodies (such as CHS) under s75 NHS Act 2006 and associated Regulations provide that a local authority and an NHS body can each delegate certain prescribed functions

to the other to exercise on their behalf, provided that the resultant partnership arrangements "are likely to lead to an improvement in the way in which those functions are exercised". Section 75 partnership agreements allow budgets to be pooled between local health and social care organisations and authorities. Resources and management structures can be integrated and functions can be reallocated between partners, and this has been the case between the Council and CHS.

The pooling of budgets is especially important during the life time of this Contract, with the expectation that estate costs will continue to be met directly by CHS. This is an important way that the contract value has been maintained at 2016 levels, and will ensure that the service is operational across all six localities from the contract start date. An open tender process would include the expectation of all bidders to identify, refurbish, and fund suitable locations until such time as integrated early help hubs are operational across the borough's six localities, reducing funding available to deliver the required outcomes to residents.

All pensions and associated pay up lifts for staff will be met from the service's budget which will be detailed in the Section 75 agreement.

(c) Continuity of Care from pre-conception services

Public Health Nursing is part of the local primary health care arrangements delivered by our One Croydon Alliance partner, CHS. Through shared ICT and management systems there are strong links to maternity, midwifery and perinatal mental health services that would be difficult to achieve with an external organisation. This is important to improving the wellbeing of our most vulnerable families.

A project to redesign the Public Health Nursing offer to better align with the council's Early Help 0-19 programme is well underway, with CHS as a key partner. A new Section 75 Agreement will allow this close working to continue throughout the second half of 2019/20, allowing a collaborative approach to alignment and redesign instead of a focus on complete tender preparation.

(d) Funding limitations of Public Health Grant

The Healthy Child Programme is funded from the Public Health Grant. Local authorities throughout the country have experienced a cut in their grant allocation for the past several years. The Health Foundation's analysis shows there has been a £900m real terms reduction in funding between 2014/15 and 2019/20. There has been no inflationary uplift to the contract since 2016.

By working in partnership the service will achieve ongoing real-term savings while delivering services to the growing population of Croydon.



In this environment, an open tender process adds another cost to the provider which cannot be recouped from the contract value without impacting frontline services.

(e) Addressing workforce challenges

Health Visiting, Family Nurse Partnership and School Nursing are a specialist workforce with recruitment challenges noted nationally. During 2019, CHS has redesigned the workforce in recognition of this ongoing challenge and to better align with the council's Early Help 0-19 programme. A change of provider at this time would introduce additional risk into the system as the Early Help programme continues to develop.

Benchmarking across London, suggests that recruitment and retention becomes more challenging when a non-NHS provider is appointed, as staff prefer to maintain NHS terms and conditions, including salary, pension, professional development and clinical supervision. Where non-NHS providers have been appointed, staff retention and recruitment has become more challenging as existing staff have in some cases chosen to take up positions with neighbouring NHS Trusts rather than accept TUPE opportunities.

### **Contract and Performance Management**

- 3.16 The day to day management of the Public Health Nursing contract will be the responsibility of the Senior Commissioning Manager, Children's Public Health, within the Commissioning & Procurement department. Contract Management will be a monthly activity, held in conjunction with Public Health colleagues. The overall performance of the contract will be reported to the Section 75 Board, with representation of senior management from both CHS and the Council.
- 3.17 A specification has been developed for the service and includes Key Performance Indicators (KPIs), milestones and a yearly delivery plan setting out, how the service will meet the requirements for each new financial year. KPIs will be related to the mandated requirements of the various services with an emphasis on outcomes and alignment to the Children's Improvement Journey, Best Start in Life, and Early Help programmes. The delivery plan will be reviewed and approved by commissioners by the end of Q4 of each Contract year.
- 3.18 Transfer of Undertaken Protection of Employment (TUPE) will not apply as the proposal is a direct award to the incumbent provider. Any staffing changes as a result of the specification and contract will be the responsibility of CHS.
- 3.19 KPIs for each service area already exist and will be further refined in line with Public Health, Children Services and Early Help and national guidance. A dashboard will be in place for each service's KPIs, and through rigorous monthly contract monitoring the service will be held accountable for delivery with relevant performance clauses within the contract.

- 3.20 The contract will be let for a period of 3 years +2 years + 2 years, the Section 75 Agreement, will have a form of wording which will allow flexibility to make changes to the specification during the length of the contract.
- 3.21 The Contract is based on the form of S75 agreement previously used for the provision of these services. Further legal advice will be sought to ensure that the documented arrangements reflect proposed revisions referred to in this report and relevant legal requirements. The following will be included in the Section 75 agreement to reflect the values and ethos of the Council:
- **Social Value** – The provider will adhere to Croydon Council’s Social Value principles and through the contract the provider will report quarterly on the following:
    - Staff are being paid to the London Living Wage
    - No. of apprenticeships that the provider has/will create
    - No. of meaningful work placements that pay Minimum of National Living wage according to eligibility
    - Local school and college visits for example delivering career talks, curriculum support, literacy, safety talks
    - Initiatives taken or support to engage people in health interventions (for example stop smoking, obesity, alcoholism and drugs etc.)
    - Number of contracts that include commitments to ethical and sustainable procurement and signing up to the Good Employer Charter

These requirements are included within the specification and will have agreed minimum requirements.

- **Safeguarding** – The contract will include specific clauses that address safeguarding, aligned to the needs of children’s social care, Care Quality Commission (CQC) and Ofsted requirements.
- **Data Protection** – there will be little change to the data processing under the new agreement as compared with the existing arrangements and appropriate data processing provisions will be included
- **Employment/TUPE** – appropriate terms and conditions will be included in the contract.
- **Decommissioning** – the process will be included in the contract to outline the circumstances where this option will apply.

This is not an exhaustive list, and as the terms and conditions are development additional requirements will be included to enhance alignment to Early Help, Education, Social Care and the One Croydon Alliance partnership.

### **Commissioning and Procurement Options**

- 3.22 The procurement options are as follows:-

1. **Do nothing** – the existing contracts will end 31 March 2020; no further extension options exist and services would cease. The council would fail to meet the ongoing statutory duties undertaken through these public health nursing contracts.
  2. **Directly award to Croydon Health Service through Section 75 Agreement (NHS Act 2006)** – the services would continue to be delivered by one of the Council’s trusted partners as part of the Early Help 0-19 programme, through a collaborative partnership model. The last half of the financial year 2019/20 will focus on embedding the new locally based team and support integrated working through membership of Best Start and Early Help Steering groups.
  3. **Open Tender Process** – A competitive tender process is held, for a provider able to deliver health services for the stated budget. TUPE of staff would apply, and a formal procurement and contract the last half of 2019/20 will focus on procurement and contract implementation activities.
  4. **Bring the Service in-house** –TUPE of staff from NHS to the Council would occur. Benchmarking suggests that staff would view this as moving to a non-NHS provider and retention would be negatively affected. Working with a trusted partner provides many of the advantages of in-house service delivery whilst maintaining access to the specialist clinical skills and knowledge of a NHS Trust, important for management of clinical safeguarding and risk.
- 3.23 Option 2 as detailed in section 3.22 of this report is the **recommended** option as it will allow the council to continue working with a trusted partner already committed to the roll-out of the Early Help programme across Croydon’s six localities. Further detail of the options are provided in section 12 of this report.
- 3.24 The recommendation is to directly award a contract to Croydon Health Service NHS Trust (CHS) through a Section 75 Agreement (NHS Act 2006). The reasons for requesting a waiver under Regulation 19 of the Councils Tenders and Contracts Regulations are as follows:
- 3.24.1 The contractor is a member of One Croydon Alliance and, as such, is a trusted partner of the council committed to delivering more integrated health and social services. Commissioners have worked with the current service to develop a new model of delivery that aligns with the Early Help 0-19 programme, focusing on prevention and early intervention priorities for some of our most vulnerable families.
  - 3.24.2 There is synergy across CHS delivered services from pre-conception to children’s services that support the long-term delivery of the Early Help programme that will be harder to establish and maintain if a separate provider is appointed to deliver the public health nursing service independently. Areas impacted would include management of clinical risks across pathways and addressing safeguarding concerns.

## Overall Strategy

- 3.25 Giving every child the best start in life is well documented throughout the literature and detailed in Professor Marmot report “Fair Society, Healthy Lives. A strategic Review of Health Inequalities in England Post 2010”. Croydon identifies itself as a borough with high ambitions for its babies, children, young people and families. The Councils Community Strategy 2016 – 2021 provides a framework for local agencies to work together on shared priorities which include: making Croydon a great place to live, work and visit, joining up services, better prevention and early intervention; and developing community assets and partnership with communities and voluntary sector.
- 3.26 These themes are aligned with Croydon’s Health and Wellbeing Strategy that focuses on giving our children a good start in life with targets to reduce low birth weight; increase breast – feeding; improve immunisations, reduce obesity; improve children’s emotional and mental wellbeing, reduce child poverty; improve educational attainment<sup>5</sup>.
- 3.27 Croydon is fully committed to giving every child in the borough the best possible start in life. The Healthy Child Programme delivered by Public Health Nursing in partnership with other agencies and public sector professionals aims to deliver this:-
- Help parents develop and sustain a strong bond with children
  - Support parents in keeping children healthy and safe and reaching their full potential
  - Protect children from serious disease, through screening and immunisation
  - Reduce childhood obesity by promoting healthy eating and physical activity
  - Identify health and wellbeing issues early, so support and early interventions can be provided in a timely manner
  - Focus on the health needs of children and young people ensuring they are school ready (SEND)
  - Make sure children are prepared for and supported in all child care, early years and educational settings and especially are supported to be ‘ready for to learn at two and ready for school by five<sup>6</sup>.
- 3.28 This service will deliver the outcomes of the Healthy Child Programme ensuring that every family receives a programme of screening tests, immunisations, developmental reviews, and information and guidance to support parenting and health choices – all services that children and families need if they are to achieve their optimum health and wellbeing.
- 3.29 This service links directly with the following strategy documents:

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<sup>5</sup> Croydon Best Start, For your new and growing family. Evaluation Report Year 2 (April 2017-June 2018) September 2018

<sup>6,9</sup> Best start in life and beyond: Improving public health outcomes for children, young people and families. Guidance to support the commissioning of the Healthy Child Programme 0-19: Health visiting and school nursing services

- Effective Support for Children, Young People and Families in Croydon, Right Help, Right Time.

*“All children and young people will receive or be able to access Universal Services, such as maternity services at birth, health visiting and children centres support in their early years, school and youth services for older children. Universal services seek, together with parents and families to meet the needs of children and young people so that they are happy, healthy, and able to learn and develop securely.”<sup>7</sup>*

*However, some children, either because of their own additional needs or because of difficult circumstances at home, will need extra help to be healthy and safe and to achieve their potential. In Croydon, we want to offer help and support to these children and their families at an early point and with the consent of their parents”<sup>8</sup>.*

- 3.30 This framework offers a way for Croydon to work together with one of its trusted One Croydon Alliance partners so that resources can be used more effectively to bring about sustainable changes for children, young people and their families. When a model of integrated health and social care service delivery.

#### **4. CONSULTATION**

- 4.1 The existing services receive positive feedback from parents and teachers. A health visiting survey was undertaken between December 2017 and January 2018, with 980 people completing all questions. 60% of respondents rated the overall service as good – excellent, though 48% would like to have more contact. The survey identified support around breastfeeding, immunisations and weaning as the most valued.
- 4.2 A schools survey was undertaken in March 2019, with 83 schools responding. For school nursing, headteachers identified an increasing need to support students in areas such as, emotional wellbeing, substance misuse, and self-harming behaviours.
- 4.3 Family Nurse Partnership - supports some of Croydon’s most vulnerable families. Client feedback reported in the 2018/19 annual review achieved 87% extremely likely to recommend the services (Friends and Family Test).
- 4.4 The service is currently undertaking further consultation in conjunction with other Early Years and Early Help Services.

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<sup>7,11</sup> Effective Support for Children, Young People and Families in Croydon, Right Help, Right Time

## 5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 5.1 The following table identifies the static funding arrangement for public health nursing services.

### Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20	2020/21	2021/22	2022/23
	£'000	£'000	£'000	£'000
<b>Revenue Budget available</b>				
Expenditure		5,857	5,857	5,857
Income				
<b>Effect of decision from report</b>				
Expenditure		5,857	5,857	5,857
Income				
<b>Remaining budget</b>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

- 5.2 The annual budget for the 3 services remains unchanged from 2016 value. The new Section 75 agreement will create one service with a combined budget (that is currently the three separate services), giving the provider greater scope to make efficiencies while delivering the outcomes attached to each service specification.
- 5.3 This alignment will support the development of greater integration between children's health and social care services, across the Early Help programme.

### Risks

- 5.4 The key risks include;
- (a) **Workforce:** The national shortage of Health Visiting, Family Nurse Partnership, and School Nursing staff creates ongoing risk to recruitment and retention especially across London. Developing a new service model with new support roles will contribute to a more stable workforce and career progression opportunities.
  - (b) **Budget Pressures:** In keeping with the other public sector areas, budget pressures will continue to be felt. The collaborative partnership approach, will ensure maximum efficiency in delivery of the Public Health Nursing activities.
  - (c) **Procurement challenge:** S75 NHS Act 2006 enables partnering arrangements between local authorities and NHS bodies. Regulation 12 of the Public Contracts Regulations 2015 enables public bodies to co-operate in the provision of public services in public interest. The services are currently

provided via s75 agreements drawn up with support from external legal advisers. Legal support will also be sought for the purposes of the new combined Section 75 Agreement. This risk is deemed as low as the Public Contract Regulations allows these types of agreements and that the report has clear recommendations.

### **Preferred Options**

- 5.5 Four options were considered and are detailed Section 12. The recommended option is option 2 to directly award to Croydon Health Service through Section 75 flexibilities (NHS Act 2006). In practice this means the service would continue to be delivered by one of the council's trusted One Croydon Alliance partners as part of the Early Help 0-19 programme. This option best meets the strategic direction of children's social care, to increase integration between health and social care services, and to enhance the early help offer across all localities of Croydon.

### **Future savings/efficiencies**

- 5.6 Commissioners will continue to work with the service to identify future efficiencies to ensure that the service can meet its statutory duties within ongoing challenging circumstances.

Approved by: Mirella Peters, Head of Finance, HWA Finance, Investment & Risk

## **6. LEGAL CONSIDERATIONS**

- 6.1 The legal considerations relevant to the recommendation are contained in the body of this report.

Approved by: Sean Murphy, Director of Law and Deputy Monitoring Officer

## **7. HUMAN RESOURCES IMPACT**

- 7.1 There is no change of provider recommended in this report and no HR implications for the Council.

Approved by: Nadine Maloney, Head of HR; Children, Education and Families

## **8. EQUALITIES IMPACT**

- 8.1 A full Equality Analysis has been completed and approved. This found that there will be no negative impact on groups that share a protected characteristic.
- 8.2 The programme will help the Council meet its equality objective to reduce differences in life expectancy between communities as it will to ensure every

child gets the good start they need to lay the foundations of a healthy life. The universal reach of the Healthy Child Programme provides an invaluable opportunity from early in a child's life to identify families that are in need to additional support and children who are at risk of poor outcomes. A healthy start in life gives each child an equal chance to thrive and grow into an adult who makes a positive contribution to the community. To facilitate this change Croydon will have to work with its partners and the first link in the process is to procure the services of a provider to deliver its Healthy Child Programme from April 2020.

- 8.3 All equalities priorities (Age, Disability, Gender, Gender Reassignment, Marriage or Civil Partnership, Religion or belief, Race, Sexual Orientation, Pregnancy or Maternity) have been addressed in this process.

Approved by: Yvonne Okiyo, Equalities Manager

## 9. ENVIRONMENTAL IMPACT

- 9.1 There are no direct environmental impacts.

## 10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 Public Health Nursing plays an important part in detecting and offering support to its clients who may be experiencing domestic violence or sexual exploitation. In terms of the Family Nurse Partnership programme the nurses help some of the most vulnerable clients who may be in gangs, offering the support needed to the young person ensuring that they receive the right help at the right time.

## 11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 11.1 To approve the award the section 75 agreement to Croydon Health Services in order to deliver the Healthy Child Programme.

## 12. OPTIONS CONSIDERED AND REJECTED

- 12.1 The alternate options considered for delivering the service are summarised below.

Option	Pros	Cons
1. Do nothing	1. The Council would save approximately £40 million over the next 7 years.	2. The Council would not meet its statutory obligations and would undermine its commitment to the best start in life for all children.
2. Recommended Option		



Award contract to CHS through a Section 75 agreement	<ol style="list-style-type: none"> <li>1. CHS is currently delivering a similar service.</li> <li>2. A new service delivery model designed with commissioners, public health, early help, and the service becomes operational in late 2019, which will be further, enhanced by continuity of provider and relationships.</li> <li>3. The latter part of 2019 can focus on embedding the new service delivery model, and collaborative service specification development instead of a focus on a formal procurement process.</li> <li>4. Working with a trusted partner already committed to working towards integrated health and social care ensures the Council can influence pace and scale of change, using established channels.</li> <li>5. The new Head of Public Health Nursing appointed in March 2019 has been instrumental in driving forward the changes to date and has become a core member of the relevant steering groups driving forward the children's improvement journey.</li> </ol>	<ol style="list-style-type: none"> <li>1. The lack of a formal tender exercise prevents market testing of the incumbent provider and the sufficiency of the 2016 static budget is untested.</li> </ol>
<b>3 Open Tender</b>	<ol style="list-style-type: none"> <li>1. Fair and transparent process is undertaken.</li> <li>2. Opportunity to test the market for other NHS and non-NHS organisations.</li> </ol>	<ol style="list-style-type: none"> <li>1. With no change to the budget since 2016 there is risk that no bidders will submit.</li> <li>2. The Early Help estate will not be available for the start of the contract across the six localities. Providers will need to acquire and rent suitable premises, increasing the cost of the service.</li> <li>3. Workforce  National shortage of specialist nurses is acknowledged. Benchmarking suggests that significant numbers of current staff would not agree to TUPE to a non-NHS provider due to impact on pensions and other terms and condition.</li> </ol>
4 Bring the service in-house	<ol style="list-style-type: none"> <li>1. Governance and management would be</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council does not have expertise in running a specialist clinical health service or senior</li> </ol>

	<p>under a democratically elected organisation.</p> <ol style="list-style-type: none"> <li>2. Potential alignment with other services for children already provided by the Council can happen more easily.</li> <li>3. Council can better influence pace and scale of change.</li> </ol>	<p>management expertise to manage safeguarding risks across health services.</p> <ol style="list-style-type: none"> <li>2. Expertise in clinical governance, clinical supervision and continuing professional development would need to be rapidly acquired.</li> <li>3. The Council would need to register with the Care Quality Commission (CQC) as a health provider.</li> <li>4. Corporate Insurance would need to be enhanced to cover clinical health service delivery and associated risks.</li> <li>5. TUPE of staff from NHS to Local Authority terms and conditions would be required. Benchmarking suggests that retention would be impacted as staff chose to move to neighbouring NHS Trusts, rather than become local government employees.</li> <li>6. Mobilisation – this will be a challenging period as the service will not know staffing levels as resignations will be contingent upon securing new roles in other NHS Trusts. Planning for contract mobilisation will be affected, and the quality of service offered in the first year.</li> </ol>
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**Table 1 Options Analysis for procurement**

### **13. DATA PROTECTION IMPLICATIONS**

#### **13.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF ‘PERSONAL DATA’?**

**YES**

The name, age, address and NHS Number will be used by the provider to deliver the service on a day to day basis. This and personal and sensitive health information will be passed to the Council as part of referral to safeguarding team. All other referrals will require prior consent of the parent/guardian.

#### **13.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**YES**

The DPIA is currently being developed and will be available for review prior to sign off the contract.

**CONTACT OFFICER:** Paul Williamson, Category Manager

**APPENDICES TO THIS REPORT:** None

**BACKGROUND PAPERS:**

The following papers were used for the report:

Best start in life and beyond: Improving public health outcomes for children, young people and families

Guidance to support the commissioning of the Healthy Child Programme 0-19: Health visiting and school nursing services Commissioning Guide 1 Background Information on commissioning and service model revised March 2018

Healthy Child Programme Pregnancy and the first five years of life, Dr Sheila, Shribman, Kate Billingham, Published 27 October 2009.

The Family Nurse Partnership accessed on 3 July 2019

<http://www.fnp.nhs.uk/our-impact.what-fnp-delivers> accessed on 3 July 2019

New reductions to the Public Health grant will heap more pressure on local authorities. Health Foundation response to Public Health Grant funding announcement. By Susannah McIntyre accessed on 12 July 2019, <https://www.health.org.uk/publications/taking-our-health-for-granted>

Tenders and Contracts Regulations 2019 Croydon Council  
Council Commissioning Framework 2019 – 2023

Director of Public Health Annual Report 2018

Our Corporate Plan for Croydon 2018 – 2022

Croydon Partnership Early Help Strategy 2018-2020

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<b>REPORT TO:</b>	<b>CABINET</b> <b>21 OCTOBER 2019</b>
<b>SUBJECT:</b>	<b>Issues and Options Consultation on the Croydon Local Plan Review</b>
<b>LEAD OFFICER:</b>	<b>Executive Director Place – Shifa Mustafa</b> <b>Director of Planning and Strategic Transport – Heather Cheesbrough</b>
<b>CABINET MEMBER:</b>	<b>Councillor Scott – Cabinet Member for Environment, Transport &amp; Regeneration (Job Share)</b> <b>Councillor King – Cabinet Member for Environment, Transport &amp; Regeneration (Job Share)</b>
<b>WARDS:</b>	<b>All</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</b>	
<a href="#"><u>Corporate Plan for Croydon 2018-2022</u></a>	
The vision set out in the introductory section of the document is provided from the Corporate Plan for Croydon 2018-2022. Relevant sections to planning of ‘what does success look like’ and ‘what will we do’ have been identified and also provided within this vision section. Going forward, this will allow future planning policies to align with the Corporate Plan vision and actions.	
<b>FINANCIAL IMPACT</b>	
The consultation on the Local Plan Review Issues and Options consultation document is estimated to cost £165k and will be funded from the Local Plan Review Reserve.	
<b>FORWARD PLAN KEY DECISION REFERENCE NO.: 2219CAB</b>	
This is a Key Decision as defined in the council’s constitution. The decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee by the requisite number of councillors.	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

**1. RECOMMENDATIONS**

The Cabinet is recommended to

- 1.1 That the Cabinet approve the publication of the Croydon Local Plan Review (Issues and Options) consultation document (Appendix 1) for public consultation under the Town and Country Planning (Local Planning)(England) Regulations 2012; and,

- |  |
|--|
| <p>1.2 That Cabinet delegate minor and/or factual changes to the Croydon Local Plan Review (Issues and Options) consultation document prior to publication for consultation to the Director of the Director of Planning and Strategic Transport in consultation with the Cabinet Member for Environment, Transport and Regeneration (Job Share).</p> |
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## **2. EXECUTIVE SUMMARY**

- 2.1 The purpose of this report is to seek Cabinet approval to publish the Croydon Local Plan Review (Issues and Options) consultation document for public consultation, to take place from 1 November 2019 to 20 December 2019. Consultation on the proposed content of the Local Plan Review is required under Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 2.2 The main aim of the Local Plan Review is to address the need for Croydon to help deliver more high quality housing and affordable housing whilst developing vibrant places to live, work, visit and socialise. Croydon has a need for 46,040 new homes between 2019 and 2039. This first consultation on the Local Plan Review sets out three different possible spatial strategies to directing growth across the borough, to meet housing need and the need for associated jobs and infrastructure, focused on different aspects of sustainability, namely environmental, economic and social sustainability.
- 2.3 The consultation document provides a section that summaries the key issues and proposed policy options for each key policy area including housing, affordable housing, housing design, urban design, heritage and local character, employment, retail, community facilities – health and education, community facilities – social infrastructure, environment and climate change, green grid, transport, parking, Purley Way and Brighton Mainline Upgrade and East Croydon Station.
- 2.4 The 16 Places of Croydon will change depending on their local character, their accessibility to services and public transport, their heritage status and the ability to deliver commensurate physical and social infrastructure to mitigate growth. For each spatial strategic option, the proportion of new homes to be built in each of the 16 Places of Croydon, and the potential growth scenarios for each of the spatial strategy options, is set out in this document.

## **3. DETAIL**

- 3.1 Croydon needs to review its existing Local Plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. Planning is critical to ensuring that Croydon meets the needs of all its residents and visitors. This Local Plan review sets out how Croydon might contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, and ensuring it is developing vibrant places for people to live, work and visit.

- 3.2 A Strategic Housing Market Assessment produced for Croydon Council by GL Hearn has calculated, using the government's standard methodology, that there is a need for 46,040 new homes in the borough between 2019 and 2039. Furthermore, the emerging London Plan, which is due to be adopted in February 2020, proposes that 29,490 new homes be built in Croydon between 2019 and 2029. The Local Plan Review will need to address both of the need for homes and the London Plan's housing targets.
- 3.3 The Croydon Local Plan Review – Issues and Options consultation document is provided over three sections:
- Strategic Options
  - Policy areas
  - Place Specific Policies

### **Strategic Options**

- 3.4 The review sets out the possible spatial strategies, sites and planning policies necessary to meet these needs, over the period from 2019 to 2039. For each spatial strategic option, the proportion of new homes to be built in each of the 16 Places of Croydon is set out in this document. In the final adopted version of the Local Plan review (which will be published in 2022 following an examination of the Plan by an independent planning inspector), it is intended that each of the 16 Places of Croydon will have its own target for the number of homes to be built. With each of the spatial strategic options some areas in the borough are likely to see less growth than envisaged by the Croydon Local Plan 2018, whilst other areas with better accessibility to public transport and local services, as well as the capacity to evolve and change, will see higher levels of growth. The strategic options set out three distinct ways the borough could grow and address the housing crisis. Each has its own strengths and challenges. Following consultation a combination of the different options may be taken forward, in consideration of the comments received about the balance of those strengths and challenges and what the most effective way of tackling the housing crisis might be.
- 3.5 The following strategic options are proposed:
- Strategic Option 1
- 3.6 **Strategic Option 1** is an environmentally and economically sustainable option but would have the greatest impact upon existing residential neighbourhoods. It is proposed a third of all new homes will be in Central Croydon, mostly on larger developments, a sixth of all new homes will be on 'allocated' sites away from Central Croydon and the Purley Way, about 10% of new homes will be in the Purley Way area as part of a comprehensive regeneration of the retail parks along the Purley Way and smaller 'windfall' sites accommodating about 40% of all new development in the borough, achieved through a combination of evolution of character in most areas of the borough; and intensification of development in areas where homes are built on large plots and are within 800m of a train station or tram stop, resulting in a gradual change of character.
- 3.7 It is considered this option is the easiest to deliver, it complies with national and regional planning policy, it is not overly reliant on large volume of housebuilders to deliver homes (meaning there is less risk in Croydon falling behind on its

housing targets and needs) and there will be no loss of green belt land, except for supporting infrastructure.

3.8 However, this option will result in changes in character in some parts of the borough where existing homes are built on large plots of land, particularly where they are located in accessible locations (within 800m of a Town Centre, train station or tram stop, or with higher levels of public transport accessibility). This will see some areas change more significantly.

3.9 Under strategic option 1 the following homes by Place (2012-2039) are proposed:

<b>Place</b>	<b>Total</b>
Addington	280 to 350
Addiscombe	1,480 to 1,880
Broad Green & Selhurst	950 to 1,140
Coulsdon	2,050 to 2,490
Central Croydon	12,430 to 14,040
Crystal Palace & Upper Norwood	480 to 670
Kenley and Old Coulsdon	2,000 to 2,480
Norbury	540 to 670
Purley	7,260 to 9,390
Purley Way transformation area	2,900 to 4,470
Sanderstead	1,670 to 2,070
Selsdon	870 to 1,070
Shirley	360 to 460
South Croydon	890 to 1,070
South Norwood & Woodside	460 to 520
Thornton Heath	1,450 to 1,880
Waddon	500 to 610
Already under construction	5,370
<b>Borough totals</b>	<b>At least 46,040 new homes across the borough</b>

#### Strategic Option 2

3.10 **Strategic Option 2** is an environmentally and socially sustainable option but would probably be the hardest to deliver as it is the most reliant on large, complex development sites to deliver. In it more growth is focussed on the Purley Way area to reduce the pressure on the suburbs of Croydon. It differs from Option 1 as it proposed to accommodate 9,500 to 12,000 homes along the Purley Way through a radical vision and plan led approach to the redevelopment of the area with high density residential and commercial/retail developments, whilst respecting the borough's most valued and protected commercial locations. The development of a delivery focused masterplan will need to facilitate this ensuring that wider infrastructure is developed to enable good growth and a vibrant place. This includes a joined up, welcoming and accessible public realm. Smaller 'windfall' sites will accommodate about a quarter of all new homes in the borough. Mainly this will be through evolution of existing character, although some areas close to services with good public transport accessibility may see some intensification. No Green Belt release is proposed under this strategic option, except for supporting infrastructure.



- 3.11 This option also has the potential to reduce the pressure for development on many of the borough's existing suburbs and the Purley Way has the potential to deliver a significant number of homes if a very high density form of development is taken forward.
- 3.12 However, this level of development along the Purley Way could impact on the important functions of the adjacent strategic industrial areas, although this impact will need to be managed/mitigated given the economic importance of the strategic industrial areas. Both Central Croydon and Purley Way would be redeveloped using a similar form of development and it is unknown if there is a big enough market for over 25,000 homes of similar types in Croydon and developers and landowners may not want to develop 25,000 homes of the types found in Central Croydon and would be expected in the Purley Way area. New typologies of high density mixed use developments and places will need to be developed which may not be fully tested. Therefore, there is a real risk that if developers did not build at the required rate, then Croydon's suburbs could still be under great pressure from development, which would have not been proactively planned for.
- 3.13 Under strategic option 2 the following homes by Place (2019-2039) are proposed:

<b>Place</b>	<b>Total</b>
Addington	190 to 230
Addiscombe	1,030 to 1,310
Broad Green & Selhurst	890 to 1,070
Coulsdon	1,460 to 1,760
Central Croydon	12,430 to 14,040
Crystal Palace & Upper Norwood	420 to 600
Kenley and Old Coulsdon	1,380 to 1,710
Norbury	360 to 450
Purley	5,400 to 7,060
Purley Way regeneration area	9,430 to 12,000
Sanderstead	1,170 to 1,450
Selsdon	580 to 710
Shirley	360 to 450
South Croydon	680 to 810
South Norwood & Woodside	350 to 380
Thornton Heath	1,340 to 1,740
Waddon	400 to 480
Already under construction	5,370
<b>Borough totals</b>	<u>At least 46,040 new homes across the borough</u>

- Strategic Option 3
- 3.14 **Strategic Option 3** is an economically and socially sustainable option but with the greatest impact on green spaces in the borough as it involves a limited release of Green Belt land for residential development to reduce the pressure

on the suburbs of Croydon. It differs from Spatial Strategic Option 1 as it proposes a limited release of Green Belt in New Addington, Selsdon and Sanderstead for 5,350 homes and smaller 'windfall' sites accommodating about just over a quarter of all new homes in the borough. This will be mainly through evolution of existing character, although some areas close to services with good public transport accessibility may see some intensification.

- 3.15 This option has the potential to reduce the pressure for development on many of the borough's existing suburbs. It is also easier to provide family homes on Green Belt sites than on intensification sites in suburban areas, or through redevelopment of Central Croydon and Purley Way and more affordable housing can be provided on Green Belt sites as their existing financial value is low. The Green Belt sites suggested already have good access to current utilities, public transport and local services and other areas of Green Belt could be improved and have better public access in compensation for the loss of some Green Belt land with little or no public access.
- 3.16 However, the emerging London Plan does not encourage the loss of Green Belt land for residential development. Although the Green Belt sites are the most sustainable sites (in terms of access to services and public transport), they are not the sites which would cause the least harm to the borough's Green Belt if they were released. As such there would be harm to the borough's Green Belt caused by this option. By releasing Green Belt for residential development it may make other parts of the borough, in particular Croydon Town Centre and Purley Way, less attractive places to develop, inadvertently increasing the pressure to redevelop the suburbs.
- 3.17 Under strategic option 3 the following homes by Place (2019-2039) are proposed:

<b>Place</b>	<b>Total</b>
Addington	190 to 230
<i>Urban extension (Green Belt) of New Addington</i>	<i>2,560 to 3,030</i>
Addiscombe	1,030 to 1,310
Broad Green & Selhurst	890 to 1,070
Coulsdon	1,460 to 1,760
Central Croydon	12,430 to 14,040
Crystal Palace & Upper Norwood	420 to 600
Kenley and Old Coulsdon	1,380 to 1,710
Norbury	360 to 450
Purley	5,400 to 7,060
Purley Way regeneration area	2,900 to 4,470
Sanderstead	1,170 to 1,450
<i>Urban extension (Green Belt) of Sanderstead</i>	<i>680 to 780</i>
Selsdon	580 to 710
<i>Urban extension (Green Belt) of Selsdon</i>	<i>1,300 to 1,540</i>
Shirley	360 to 450
South Croydon	680 to 810
South Norwood & Woodside	350 to 380
Thornton Heath	1,340 to 1,740

Waddon	400 to 480
Already under construction	5,370
<b>Borough totals</b>	<u>At least 46,040 new homes across the borough</u>

3.18 The table above identifies the proposed urban extensions (Green Belt) for this strategic option. The Green Belt review, undertaken by Wood Environment and Infrastructure Solutions, reported on the likely effects of potential development on sites within the Green Belt. The likely degree of harm on the Green Belt is provided for each site and following a five-point scale (significant, significant to moderate, moderate, moderate to limited, limited to moderate and limited), reflecting the application of professional judgement in the light of the likely effects of development on its openness and permanence.

3.19 Urban extensions are proposed in Sanderstead, Selson and Addington. Below provides the breakdown of the parcels of land that make up these extensions and the level of harm that have been assessed at:

Land at Borrowdale Drive/Mitchley Hill, Sanderstead



The Green Belt review, undertaken by Wood Environment and Infrastructure Solutions, reported that '*Whilst the parcel is bounded on all sides and part of the footprint of Sanderstead, its scale and orientation/ exposure mean that a connection with the wider countryside and contribution to openness is maintained.*'. It also said that '*Whilst the site is of a moderate scale and well bounded on all sides, it has a high degree of visual exposure which makes mitigation challenging. Development is judged to result in **Significant to Moderate harm** to the Green*

*Belt, reflecting the clear loss of openness on a visually sensitive slope but ameliorated by the contained character of the site and extension of surrounding built form.'*

However, the site is only a 12 to 20 minute walk from Riddlesdown station and an 8 to 13 minute walk from Sanderstead Local Centre, with no other designations that preclude development, so is one of the most sustainable Green Belt sites in Croydon, were Green Belt sites to be released for development. Paragraph 138 of the National Planning Policy Framework says that '*where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*

It should also be noted that Borrowdale Drive was presumably meant to extend across the site as, unusually, it is in two parts, one being off Mitchley Hill, and the other part coming off Rectory Park.

### Land at Gravel Hill, Selsdon



The Green Belt review, undertaken by Wood Environment and Infrastructure Solutions, reported that '*The parcel prevents the further sprawl of development along the A212 and helps to maintain a degree of openness and countryside character.*'. It also said that '*Development of this suite of sites as a whole would result in **Significant to Moderate harm** to the Green Belt, arising from the removal of openness from exposed land which prevents sprawl and encroachment. The extent of removal of land associated with the sites, boundary issues to the west, limited opportunity for mitigation and the creation of 'remnant' Green Belt add up to the judged degree of harm.*

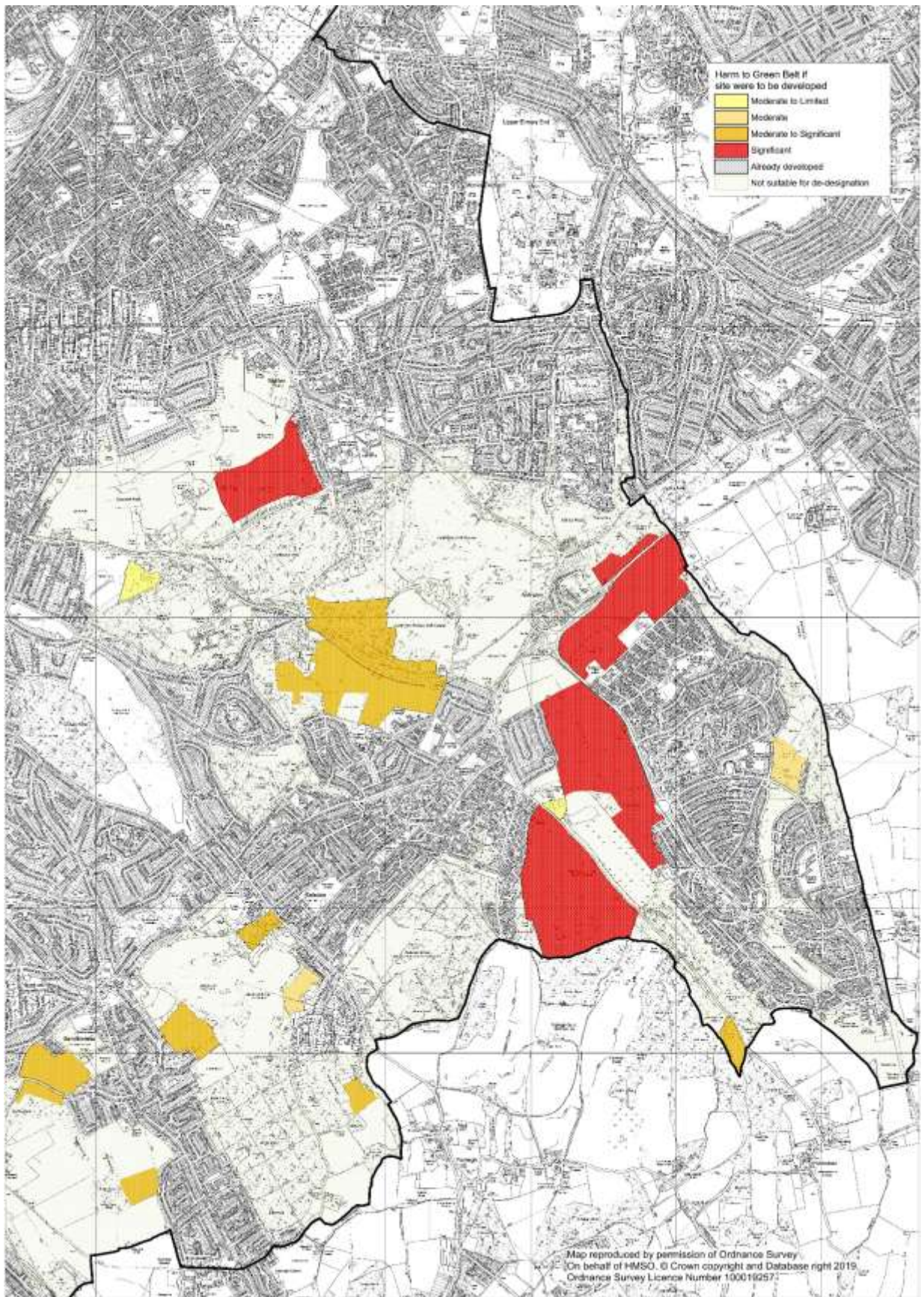
However, the site is adjacent to the tram line with Gravel Hill tram stop being located at the north eastern corner of the site. There are also no other designations that preclude development, so is one of the most sustainable Green Belt sites in Croydon, were Green Belt sites to be released for development. Paragraph 138 of the National Planning Policy Framework says that *'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.'*

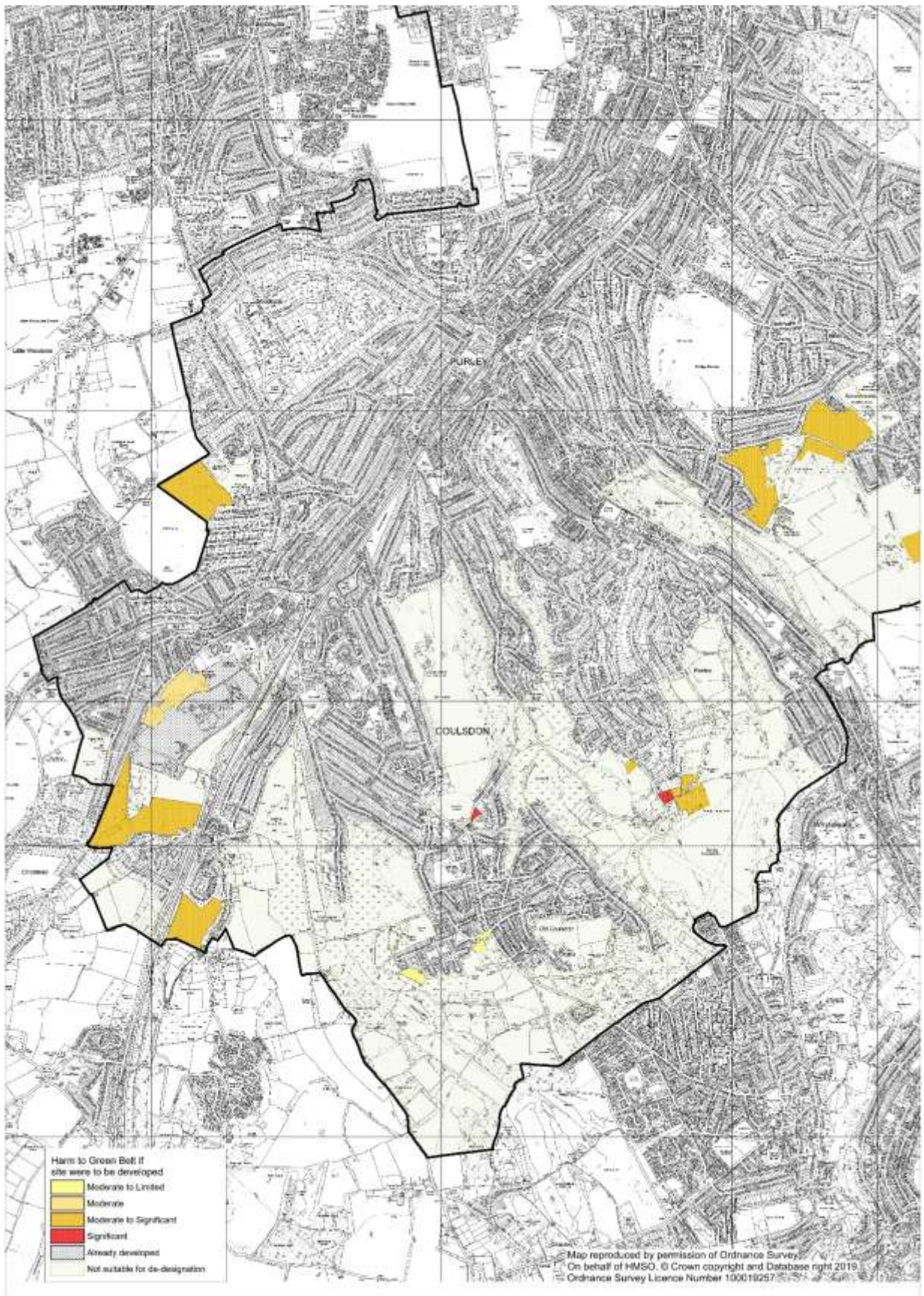
#### Land at Lodge Lane and North Downs Crescent

The Green Belt review, undertaken by Wood Environment and Infrastructure Solutions, reported that *'The parcel makes a Significant Contribution to Green Belt purposes through role in preventing sprawl and encroachment and maintaining separation, as well as acting as part of the context for Addington Village.'* It also said that *'Development would result in **Significant harm** to the Green Belt, removing open land which makes a Significant Contribution to containing sprawl, encroachment into open countryside and maintaining separation between Selsdon and New Addington. The external boundaries to the sites are not substantial to ensure long term containment.'*

However, the site is adjacent to the tram line with Fieldway and King Henry's Drive tram stops being adjacent to the site. It lies opposite to the New Addington branch of Lidl, and 8 to 20 minutes walk from New Addington Town Centre. There are also no other designations that preclude development, so is one of the most sustainable Green Belt sites in Croydon, were Green Belt sites to be released for development. Paragraph 138 of the National Planning Policy Framework says that *'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.'*

- 3.20 The Green Belt review, undertaken by Wood Environment and Infrastructure Solutions, reported that virtually all of Croydon's Green Belt makes a significant contribution to Green Belt purposes. Furthermore only four parcels of land, if de-designated would cause just Moderate to Limited harm to the Green Belt, and no land, if de-designated would cause just Limited harm. The maps below show the findings of the Green Belt review.





3.21 The National Planning Policy Framework says, in paragraph 136, that ‘once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.’ It goes on to say in paragraph 137 that ‘before concluding

*that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.'*

3.22 It should be noted from the above that Strategic Option 3 can only be pursued if it is proven that Strategic Options 1 and 2 cannot meet Croydon's housing, employment and infrastructure needs. Furthermore the emerging London Plan says in Policy G2 that the Mayor will not support any de-designation of Green Belt. It is a requirement of the s24(1)(b) of the Planning and Compulsory Purchase Act 2004 that Croydon's Local Plan be in general conformity with the London Plan, which means the Local Plan Review should not include policies that are at odds with the London Plan.

3.23 The consultation document provides a section that summarises the key issues and proposed policy options for each key policy area including environment and climate change, green grid, housing, affordable housing, housing design, urban design, heritage and local character, employment, retail, community facilities – health and education, community facilities – social infrastructure, transport, parking, Purley Way and Brighton Mainline upgrade and East Croydon Station. Each section is summarised below:

Environment and climate change:

Croydon Council declared a Climate Change Emergency in July 2019 and established a target for the Council to become carbon neutral by 2030. Climate change is a global issue with many local impacts, such as flooding events. Croydon is the 4<sup>th</sup> most susceptible town in the UK for surface water flooding.

3.24 Other environmental issues that the Local Plan Review will need to focus on include:

- Sustainable Urban Drainage Systems (SUDS) are an effective method of preventing rainwater joining the main sewers and helping to prevent flooding – yet they are considered complicated or expensive by developers/domestic property owners and are infrequently used in new small or large-scale developments.
- The environmental quality of new homes.
- The emerging London Plan aspiration of all developments to be zero-carbon.
- Croydon Council has the aim to boost the borough's recycling rate, plant 3,500 trees by 2023, reduce energy use, create School Streets, and create spaces to rest and recover along walking routes and make cycling safer and easier for all.

3.25 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address environmental and climate change issues:

- Push developers to meet the highest standard of sustainable design and construction for new builds, conversions and refurbishments, such as those



set out in the emerging London Plan and Building Regulations (2013) for energy, water and emissions efficiency, and achieving minimum BREEAM standards for sustainability.

- Encourage and enable sustainable refurbishment of our existing housing stock, including insulation and the addition of renewable technologies.
- Apply the thrust of the emerging London Plan climate change strategy.
- New development to enhance even further than in the existing Local Plan improved public realm spaces to embrace exemplar uses of sustainable design, including enhancing biodiversity, incorporating integrated SUDS and sourcing sustainable materials, otherwise the additional homes needed to address the housing crisis will not be able to be delivered.
- Introduce typology specific policies for the provision of green infrastructure in places like busy streets and areas around schools, to tackle air pollution.
- Facilitate reforestation, especially through the extension of existing woodland
- Protect important ribbons of woodland running through gardens and other open spaces that provide wildlife habitats and link other areas that are important in allowing wildlife to migrate
- Creation of designated green routes through the borough.
- Facilitate opportunities for urban farming, growing and enhancing the borough's biodiversity.
- Enhance public realm to promote sustainable and active modes of travel, including civic spaces and pocket parks to rest, water re-filling points and other public facilities.

#### Green Grid:

3.26 One third of Croydon is green space, made up of mixture of Green Belt, Metropolitan Open Land, recreation / sports grounds and other open spaces. There is an increasing pressure on these green spaces from population growth and the fragmentation of the green grid.

3.27 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address green grid issues:

- Protecting and improving access to Metropolitan Green Belt and Metropolitan Open Land.
- Designating the most demonstrably special open spaces in the borough as Local Green Space with the support from, and a leading role from, the local communities they serve.
- Protect other Green Spaces in the borough from development and seek to increase access to and quality of these spaces.
- Support urban farming and growing to diversify the green networks; this can include bee-keeping.
- Including the intended borough's Green Grid in planning policy and on the Local Plan policies map, with further detailed guidance to foster the network and links to follow.
- Requiring all new developments to; provide a net-gain in biodiversity, and; maximise opportunities for green corridors, green infrastructure, urban greening and high quality public realm and landscape design.
- Require new developments to increase access to open space for residents and improve the quality of existing open space.

- Publish guidance on Croydon's Green Grid including how it can act as corridors for wildlife, and to encourage more sustainable journeys on foot or by bike through high quality public realm design and interventions.
- Protecting and planting new trees.
- Empowering local communities to take ownership of their parks, open spaces, streets to create pocket parks, parklets and community gardens.
- Establishing a clear policy link between the air quality benefits of the Green Grid and actions to mitigate and adapt to climate change.  
Integrate smart and digital infrastructure to facilitate and enhance the green grid objectives.

Transport:

3.28 As Croydon grows, we need to cut the amount of private car use, traffic and congestion and resultant pollution in our streets.

3.29 Other transport issues that the Local Plan Review will need to focus on include:

- We need to help people be more active (to walk and cycle more) as part of their daily travel routine.
- Growth is happening all over Croydon, including in suburbs that lack high levels of public transport which presents challenges for increasing walking, cycling and public transport use borough-wide.
- A balance is required between meeting the on-going needs for some personal cars and the need to reduce reliance on them in order to ensure "good growth".
- On-site parking provision should be designed as an intrinsic part of a development proposal, meeting high design standards and making provision for disabled persons parking.
- Proactively managing the provision of car parking including on-site, results in a more efficient use of land and can help to discourage unnecessary use of the private car, as well as allowing more homes to be built on less land, less hard standing that adds to flooding, resulting in less development pressure in the suburbs.
- Reducing car use/parking in the south of the borough will be challenging due to relatively limited public transport coverage and topography meaning greater reliance on cars. This is exasperated further by the fact that commercial car club operators are, currently, not interested on operating from sites in suburban locations.

3.30 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address green grid issues:

- New pedestrian and cycle routes, including the expectation that new major developments connect to the pedestrian/cycle network and public transport stops and stations.
- Continue to improve and enhance the design of streets and walking/cycle networks. Street design should integrate facilities such as public toilets, pocket parks, generous and safe crossings to prioritise people over cars, and as a result encourage the uptake of walking, cycling and public transport.
- Enhancing the bus and tram network to link new and growing places, such

as Coulsdon, Norbury Purley, Purley Way, Sanderstead, Selsdon, , beyond the current terminus at New Addington and other routes heading out of the borough towards both Bromley and Sutton.

- Safeguarding land needed for major rail and tram upgrades, extensions and supporting facilities.
- Scope and test the feasibility of new types of public transport that can serve the growing suburbs, such as on-demand bus services.
- Enabling and supporting integration of new smart technologies and digital infrastructure to improve navigation and facilitate electric vehicles.
- Intensify development in parts of the borough to provide the critical mass of new residents and businesses for there to be a business case for new transport infrastructure.
- Policies to meet all (including non-residential) evolving parking needs, including the delivery of cycle parking, cycle lanes, car clubs, electrical vehicle charging points, highway safety, business deliveries and managing parking stress (e.g. car free or permit free developments) alongside non land use planning mechanisms to manage car parking provision, such as controlled parking zones (CPZs) in residential areas and in town centres.
- Consider applying lower maximum parking standards than those set out in the London Plan, using Public Transport Accessibility Levels (PTALS) to inform provision.
- Seek ways for developers to support the development of car clubs in the suburbs.
- Consider applying minimum parking standards in locations with very limited accessibility to public transport to prevent overspill parking onto local streets and minimise development density in unsustainable locations.
- Designate specific local plan housing allocations as ‘car free’ or ‘permit free’.

#### Brighton Mainline Upgrade and East Croydon Station:

- 3.31 Croydon Area Remodelling Scheme (CARS) is the largest and most complex part of Network Rail’s longer-term Brighton Main Line upgrade project. CARS would remove the most operationally challenging bottleneck on Britain’s railway network, located in the ‘Selhurst triangle’, the junctions north of East Croydon, and through East Croydon station and East Croydon is a critical sustainable transport node, providing access to the train, tram, bus, walking and cycling networks.
- 3.32 Issues that the Local Plan Review will need to focus on for the Brighton Mainline Upgrade and East Croydon Station include:
- That the project is undertaken without significant disruption to existing residents, businesses and development proposals.
  - The CARS project cannot take place unless land currently outside of Network Rail’s ownership is tied in with the project.
  - Some proposals may have to be timed and designed to ensure that the CARS project is protected so that the bigger picture of the proposed upgrade to the Brighton Main Line is able to be delivered.
  - The CARS project will result in the loss of and impact business space in some Industrial Estate locations, including Tait Road Industrial Estate.

- The CARS project requires additional land outside of Network Rail's ownership, temporarily to support construction.
- Ensuring the project and adjacent station development is a catalyst to inward investment in the East Croydon Station area, to improve the economy of area and borough and cement the borough's position as an outer London strategic economic location to the benefit of Croydon, London and wider South East.

3.33 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address the Brighton Mainline Upgrade and East Croydon Station issues:

- Ensuring that the development in the Local Plan is timed and delivered alongside the need to deliver the CARS project so that it is delivered whilst as far as possible allowing growth to flourish in other parts of the borough.
- The Local Plan, East Croydon Masterplan, TWA Order and a Strategic Regeneration Framework are persuasive to the Department of Transport to approve the outline and final business case for the CARS project.
- The Local Plan review, TWA Order and proposed Strategic Regeneration Framework are still used as a clear planning framework setting the requirements and design parameters for a successful East Croydon Station, sustainable transport interchange, improved public realm and appropriate 'adjacent to station' development.
- The vision, CARS project and the above will only be delivered by meaningful and successful collaborative working through the CARS governance, including all key stakeholders.
- The Local Plan review provides the policy and allocation framework for the successful protection of the land required for the CARS project, including scheme construction.
- The Local Plan review provides the policy and allocation framework to enable the appropriate re-provision of impacted Industrial Estate locations, including Tait Road Industrial Estate.

Housing (including affordable housing and housing design)

3.34 The Strategic Housing Market Assessment commissioned from GL Hearn to support the Local Plan Review identifies that Croydon's population is gradually getting older and household sizes are getting smaller. Furthermore, open market housing (both private rented and for sale) is getting less and less affordable for many households in the borough. The Strategic Housing Market Assessment has calculated that 2,254 affordable rented homes a year would be needed in Croydon to meet the need of lower income households for housing. There is also a need for 1,453 affordable home ownership homes in the borough each year. Policies in the Local Plan Review will need to tackle these issues.

3.35 Other housing issues that the Local Plan Review will need to focus on include:

- The need for family and non-family homes;
- The need for specialist housing for the elderly, in particular supported living;
- Provision of high quality amenity space in residential developments; and
- Reducing the carbon emissions of new homes.

- 3.36 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address these housing issues:
- Finding enough housing sites and a strategy to meet the housing needs of the borough.
  - Setting out the mix of homes to be achieved on sites around the borough, including setting out where studio homes and larger units are best provided.
  - Encouraging mixed tenure, mixed size development to encourage the development of balanced new neighbourhoods.
  - Supporting high quality build to rent homes in Croydon.
  - Promoting self-build, custom-build, community-led housing schemes, co-living, intergenerational housing and other positive specialist models.
  - Supporting the development of high quality private rented accommodation in Croydon.
  - Supporting developments that include supported living accommodation for the elderly and those with physical or learning disabilities.
  - Promoting and guiding high quality design of new homes including amenity, public realm, and enhancing local character and vitality of a place.
  - Ensuring new developments are attractive for households wishing to downsize in the borough.
  - Promoting and guiding the development of accessible, lifetime homes and wheelchair accessible homes.
  - Setting out requirements to design in high quality affordable homes.
  - Supporting developments that actively market their homes and prioritise them for people who live or work in Croydon.
  - Setting minimum requirements for affordable housing based on testing of common development typologies at plan-making stage.
  - Reducing or removing viability assessments for developments that meet the minimum affordable housing requirements.
  - Adopting London Affordable Rent levels in place of affordable rents at up to 80% of market rents .
  - Seeking the maximum affordable rented accommodation possible on developments whilst also delivering other types of affordable homes (such as shared ownership and London Living Rent).
  - Introduction of viability credits.
  - Review how to encourage developments of 10-15 homes without the 'cliff edge' impact of exceeding 9 that currently exists.
  - Introducing a simple and transparent system of financial contributions towards affordable housing for developments of under 10 homes, which are currently exempt from providing any affordable housing, to fund additional affordable housing in the borough.
  - Reviewing existing policies on the affordable housing tenures, types and mix needed whilst ensuring developments create mixed and sustainable communities.
  - Introducing more robust policies to ensure that sufficient wheelchair accessible homes for people in need of affordable housing are developed.
  - Tightening up the existing policy on Vacant Building Credit so that only genuinely vacant buildings benefit from it.
  - Updating existing Local Plan policies to cover additional design and place making principles such as tenure blindness.

- Adopting the emerging London Plan threshold approach which aims to incentivise developers to deliver minimum levels of affordable housing by offering a fast track route through planning.
- Provide more robust housing design policies that ensure inclusive design, such as; shared entrances and amenities, high quality public realm and landscape architecture with integration into the wider public realm.
- Identify and promote design and quality standards that will help to produce more inclusive housing for older people and people with disabilities, as well as accessible and lifetime homes.
- Build upon our understanding of the character of our 16 Places, the evolution of the suburbs and improved public realm as a way to increase densities and deliver higher urban densities.

#### Employment and Retail:

- 3.37 Croydon is the largest town centre in London and one of only two strategic office centres out central London. There are also 9 other Town Centres, 9 Local Centres and 18 Neighbourhood Centres and 62 Shopping Parades in the borough.
- 3.38 Key issues that the Local Plan Review will need to focus on regarding employment and retail include:
- The pressures on employment land for it to be used for residential development.
  - The demand for current industrial spaces is resulting in rent increases for local businesses.
  - Croydon is facing competition from other areas of south London for being the key retail destination.
  - There is increasing vacant retail premises across the borough's high streets.
- 3.39 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address these employment and retail issues:
- Protecting, upgrading and encouraging intensification of the borough's existing employment areas, especially the most valuable and protected employment areas.
  - Exploring opportunities for intensification of employment space according to local demand, supported by interesting urban design and landscaping, promoting innovative communication and making urban areas more accessible through encouraging short cuts and better ways to get around, which will ensure the employment areas are pleasant places to work.
  - Encouraging town centre and urban areas where people can live near new and innovative workplaces, which have a positive relationship between the land uses and the local area.
  - Encouraging creative and cultural businesses through the provision of affordable flexible spaces, studio spaces, display spaces.
  - Provide affordable workspace, production spaces, studios and maker spaces, creative workspaces/workshops.
  - Improve skills through the location of education facilities associated with

- existing local youth talent.
- Protecting, upgrading and encouraging intensification of the borough's existing employment and retail areas.
- Exploring opportunities for intensification of employment space according to local demand.
- Encouraging town centre and urban areas where people can live near new and innovative workplaces.
- Protecting and improving existing successful retail areas.
- Encourage diversity in the offer of centres to meet modern needs; researching the changing nature of retail and its various typologies (both retail and industry) to inform emerging masterplans.
- Encourage the use of sustainable modes of transport; cycling, walking and public transport to increase customer footfall through retail hubs.
- Encouraging more living above shops to make centres safer and more vibrant.
- Improve and create an active and engaging public realm along the high streets to attract new businesses and increase customer footfall. Diversification of high street offer is also needed in a changing retail landscape.
- Support development of local and regional business networks along high streets.
- Improve employment and skills training and opportunities for local residents including business support for start ups; precursors and testing of new retail models and typologies.
- Protect and enhance commercial/retail spaces in high streets, Local and Town Centres that provide essential services as there will be an increasing number of homes and residents.
- Consider wider 'retail' and commercial offerings in smaller struggling centres that include services, coffee shops, workshops, and small studios.
- Integrate affordable units for creative and cultural uses and social infrastructure within town centres.

### The Purley Way:

- 3.40 The Purley Way is the borough's primary employment location, including two Strategic Industrial Locations, and there is a new to facilitate considerable growth in residential and mixed use development along the Purley Way.
- 3.41 Issues that the Local Plan Review will need to focus on for the Purley Way include:
- How to facilitate growth in residential and mixed use development without undermining Purley Way's industrial land and existing occupiers.
  - There is a need to ensure mixed-use development provides appropriate spaces for commercial uses to thrive whilst also providing high quality living spaces and amenity for residents
  - In depth research is needed to understand what form of commercial development and activity is likely to be attracted to the Purley Way in the future.
  - The street environment of Purley Way is unpleasant owing to the dominance of the heavy traffic which causes severance and the green, social and physical infrastructure required to support considerable

development growth needs to be carefully considered to ensure existing and future communities are well supported.

3.42 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address the Purley Way issues:

- Prepare a Masterplan to guide development in the Purley Way, and incorporate those elements that are essential to the successful regeneration of the area in a dedicated chapter of the Local Plan review.
- Ensure new development knits well with existing communities within and around the Purley Way.
- Consider the Purley Way as an Opportunity Area, which can accommodate a new innovative residential community, helping to significantly address the borough's housing need.
- New development focuses on creating places/neighbourhoods rather than a corridor of development.
- Facilitate considerable growth and change to grow this community, which respects the commercial importance of the Purley Way, particularly the Strategic Industrial Locations.
- Continue policy protection of the Purley Way Strategic Industrial Locations whilst supporting the potential for intensification of commercial and industrial space.
- Set clear parameters for development, such as land use, height, massing and infrastructure mitigation to ensure sites are utilised fully, but developed in a sustainable and appropriate matter.
- Provide clear policies and design guidance to ensure that mixed use development is successfully co-ordinated and functions well for both businesses and residents.
- Utilise the masterplanning process to establish strong sustainable connections to Wandle Park, Central Croydon and Purley Town Centre.
- Provision of new infrastructure provides opportunity to bring together new and existing community.
- New pedestrian and cycle routes, including the expectation that new major developments connect to the pedestrian/cycle network and public transport stops and stations.
- Plan for the infrastructure (green, social and physical) needed to support good growth<sup>1</sup> along the Purley Way and create a functioning and coherent place.
- Public realm and landscaping to reduce the dominance of car/address air quality.
- Create parks and green links of varying scales to form part of a green grid along the western side of the borough linking Croydon cemetery to Roundshaw Downs through the Purley Way area.
- Establish a set of projects which address the poor urban environment, improve the public realm and the reduce the dominance of the A23.
- Promote the extension of the tram from Ampere Way south along the Purley Way to Purley Town Centre to greatly improve connectivity and support housing growth to improve quality of life for all Croydon's vibrant and diverse communities.

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<sup>1</sup> Includes reducing car dominance, providing inclusive access to public transport, creating well connected communities and uses the "Healthy Streets" approach (GLA, Good Growth by Design).



## Urban Design, Heritage and Local Character

- 3.43 Policy options, in addition to those already included in the Croydon Local Plan 2018, include:
- Identify the best landmark locations where tall buildings across the borough will be able to deliver additional housing and create interesting and high quality urban focal points.
  - Use heritage-led regeneration that builds upon the rich local history and character and helps to preserve and enhance the existing heritage assets.
  - Make sure that the shared environment is enhanced and improved so that streets are still welcoming alongside the delivery of additional homes.
  - Check that the existing Croydon Local Plan 2018 policies are innovative and adaptable enough to enable new and emerging smart/digital infrastructure to be allowed to enhance sustainable development.
  - Ensure the shared environment is enhanced/improved to create high quality spaces that can accommodate the more intensive use that additional homes will demand.
  - Policies on the protection, evolution and change of local character for different areas of the borough that relate to the strategic options.

### Community facilities:

- 3.44 The key issue regarding community facilities is the access to appropriate community facilities, such as educations, health, religious, sporting cultural and creative spaces, for all residents of Croydon.
- 3.45 The following policy framework is proposed in the Local Plan Review (Issues and Options) consultation document to address community facility issues:
- Allocate sites for schools and healthcare facilities that will meet the needs of the borough, and in particular the needs of Places that are planned to see more growth as part of the Local Plan review.
  - When there are no other sites, permit schools to be built on policy-constrained or open land to ensure there is sufficient space for play grounds and sports facilities.
  - Encourage the co-location of community services, which could also integrate healthcare delivery, in sustainable, accessible locations and within buildings capable of future adaptation.
  - Encourage community uses within mixed use, residential-led developments.
  - Enable a university/creative campus and higher education programmes in Croydon.
  - Encourage the provision of infrastructure and facilities for learning and developing skills in creative industries and other practical professions e.g. print studios, workshop spaces, and community kitchens.
  - Protecting and enhancing existing community facilities that continue to meet the needs of residents, including public houses.
  - Support the creation of new accessible community spaces, activities and facilities in appropriate locations commensurate to the growth of the borough.
  - Support creation of sustainable activities and processes such as urban

- farming, community kitchens and cafes
- Facilitate and support a high quality, welcoming public realm and open spaces that are well connected and designed for active lifestyles including walking and cycling, as well as promoting the borough’s biodiversity and improves air quality
- Support entrepreneurial, creative and cultural industries in facilitating community activities, and support these industries co-location in spaces which encourage efficiency of use.
- Encourage better use of existing and new community facilities (for example making more use of school facilities outside of school hours).

3.46 The 16 Places of Croydon will change depending on their local character, their accessibility to services and public transport, their heritage status and the ability to deliver commensurate physical and social infrastructure to mitigate growth. For each spatial strategic option, the proportion of new homes to be built in each of the 16 Places of Croydon is set out in this document.

3.47 Site Allocations are also identified under each Place, including sites for future housing and other development such as schools, health facilities and community centres. The table below lists all site allocations, sorted by Place.

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
1	Land Fronting North Downs Road and Overbury Crescent	Residential development	18 to 64	Addington
120	Timebridge Community Centre, Field Way	Secondary school buildings	n/a	Addington
2	Blackhorse Lane Station	Residential development (over station)	18 to 104	Addiscombe
3	Bupa Nursing Home	Residential development	25 to 77	Addiscombe
68	130 Oval Road	Residential development	10 to 57	Addiscombe
8	Motor Village Croydon, 121 Canterbury Road	Residential development (possibly with replacement car showroom)	13 to 33	Broad Green & Selhurst
13	Boyden Tiles	Mixed use residential and industrial/warehousing development	20 to 74	Broad Green & Selhurst
20	98 – 100 Lodge Road and 1 – 3 Frederick Gardens	Residential	5 to 20	Broad Green & Selhurst

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
22	Whitehorse Road garages and parking area, Whitehorse Road estate (Johnson Road/Cromwell Road)	Residential	5 to 25	Broad Green & Selhurst
78	114-118 Whitehorse Road	Residential conversion and extension	7 to 8	Broad Green & Selhurst
314	Valley Park (B&Q and Units A-G Daniell Way), Hesterman Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre.	237 to 641	Broad Green & Selhurst
334	Valley Leisure Park, Hesterman Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre.	34 to 90	Broad Green & Selhurst
348	Homebase & Matalan stores, 60-66 Purley Way	Mixed use residential and retail development	128 to 482	Broad Green & Selhurst
396	Praise House, 145-149 London Road	Redevelopment for mixed use residential and community use	9 to 52	Broad Green & Selhurst
416	Challenge House, 618 Mitcham Road	Residential redevelopment or conversion. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	36 to 136	Broad Green & Selhurst
471	Masonic Hall	Residential	7 to 39	Broad

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
	car park, 1- 1B Stanton Road	development		Green & Selhurst
372	Car park, Lion Green Road	Residential development	157	Coulsdon
945	Waitrose, 110-112 Brighton Road	Residential, retail, car parking (and healthcare facility if required by the NHS)	55 to 90	Coulsdon
5	AIG Building, 2-8 Altyre Road	Residential development (possibly with other non-retail town centre uses)	19 to 59	Central Croydon
21	Former Royal Mail site, 1-5 Addiscombe Road	Residential led mixed use development incorporating either hotel, office, leisure and/or class A2-A5 uses.	74 to 201	Central Croydon
31	Croydon College car park, College Road	Mixed use redevelopment comprising hotel & residential	159	Central Croydon
33	20-28 Addiscombe Road (Go Ahead House & Easy Hotel)	Residential, office and/or hotel	37 to 105	Central Croydon
34	Land Bounded By George St, Park Lane, Barclay Road, And Main London To Brighton Railway Line	Mixed use development incorporating residential use on land behind the Fairfield Halls.	814 to 2098	Central Croydon
37	45 Lansdowne Road	Residential development	37 to 117	Central Croydon
40	West Croydon Bus Station	Redevelopment over the bus station to incorporate residential uses and town centre uses (office, leisure, food & drink or hotel). The bus station is to be retained as part of any redevelopment.	45 to 142	Central Croydon
41	Direct Line House, 3 Edridge Road	Residential and/or office development	40 to 126	Central Croydon
42	The	Mixed use	35 to 101	Central

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
	Lansdowne Building, 2 Lansdowne Road	development of office and residential		Croydon
45	East Croydon Station	Mixed use development including redevelopment of the existing railway station	To be confirmed	Central Croydon
46	Southern Motor Group, 22 Lansdowne Road	Mixed use development of residential and light industrial	111 to 319	Central Croydon
47	3-7 Park Street	Mixed use residential and ground floor town centre use	13 to 50 (subject to impact on the heritage of the area)	Central Croydon
50	44-60 Cherry Orchard Road	Residential development subject to the relocation of the existing business to another site in the borough	120	Central Croydon
123	Prospect West and car park to the rear of, 81-85 Station Road	Residential (with healthcare facility if required by NHS)	40 to 288	Central Croydon
138	Cherry Orchard Gardens and site between railway line and Cherry Orchard Road, Cherry Orchard Road	Mixed use development of residential with offices, restaurant/café, hotel and/or community facilities	445	Central Croydon
142	1 Lansdowne Road	Mixed use development comprising residential, with offices, leisure and/or hotel	794	Central Croydon
148	Canterbury House, Sydenham Road	Comprehensive mixed-use redevelopment including residential (but not including retail)	54 to 153	Central Croydon
174	30-38 Addiscombe	Residential development	49 to 141	Central Croydon

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
	Road			
175	Stephenson House, Cherry Orchard Road and Knolly House, Addiscombe Road	Residential and/or office	132 to 380	Central Croydon
182	St Mathews House, 98 George Street	Redevelopment for residential and/or offices and/or retail (on George Street frontage)	7 to 20	Central Croydon
184	1-19 Derby Road	Residential development above, community uses on lower floors	48 to 137	Central Croydon
186	Jobcentre, 17-21 Dingwall Road	Offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if required by the NHS)	49 to 141	Central Croydon
187	28 Dingwall Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)	16 to 44	Central Croydon
190	Car park to the rear of Leon House, 22-24 Edridge Road	Residential development	56 to 162	Central Croydon
192	Suffolk House, George Street	Mixed use redevelopment with offices or residential dwellings above retail units at ground level	35 to 101	Central Croydon
194	St George's Walk, Katharine House and Park House, Park Street	Residential with new civic space and a combination of retail, other Class A uses, leisure and office use.	88 to 504	Central Croydon
199	20 Lansdowne Road	Residential development with light industrial workshops and studio spaces	109 to 313	Central Croydon
200	Multi-storey car park,	Mixed use, public car park and residential.	133 to 384	Central Croydon

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
	Lansdowne Road			
201	Lidl, Easy Gym and car park, 99-101 London Road	Primary school with residential development on upper floors	51 to 293	Central Croydon
203	West Croydon station and shops, 176 North End	Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above	79 to 455	Central Croydon
211	Poplar Walk car park and, 16-44 Station Road	A more intensive use of the site with retail on the ground floor and residential use on other floors subject to the replacement of the car park which provides disabled car parking spaces for the Town Centre	50 to 141	Central Croydon
218	Lunar House, Wellesley Road	Office and residential and/or hotel (with healthcare facility if required by the NHS)	188 to 542	Central Croydon
220	9-11 Wellesley Road	Residential and/or hotel and/or retail and/or finance	21 to 60	Central Croydon
222	Multi-storey car park, 1 Whitgift Street	Residential with community facilities commensurate in size and functionality to that currently on the site	95 to 193	Central Croydon
231	Segas House, Park Lane	Residential conversion with cultural uses if required (with town centres uses considered if there is no interest in delivery of cultural uses).	40	Central Croydon
234	Southern House, Wellesley Grove	Offices and residential and/or hotel (with healthcare facility if required by the NHS)	181	Central Croydon
236	Apollo House,	Offices and residential	82 to 234	Central

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
	Wellesley Road	and/or hotel (with healthcare facility if required by the NHS)		Croydon
245	Mondial House, 102 George Street	Office and/or residential development or offices or hotel and/or retail (on George Street frontage)	30 to 85	Central Croydon
294	Croydon College Annexe, Barclay Road	Residential redevelopment with community uses and Creative and Cultural Industries Enterprise Centre	20 to 56	Central Croydon
311	Mott Macdonald House, 8 Sydenham Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)	34 to 97	Central Croydon
374	Reeves Corner former buildings, 104-112 Church Street	Mixed use with residential to upper storeys and retail on ground floor	23 to 64	Central Croydon
393	Whitgift Centre, North End	Expansion of shopping centre, improved transport infrastructure, public realm and residential development	400 to 1000	Central Croydon
417	Stonemead House, 95 London Road	Residential	23 to 64	Central Croydon
489	Corinthian House, 17 Lansdowne Road	Retention of offices with residential conversion, and/or hotel (with healthcare facility if required by the NHS)	30 to 85	Central Croydon
493	Pinnacle House, 8 Bedford Park	Mixed use of residential with offices (or a healthcare facility if required by the NHS) on the ground floor	44 to 125	Central Croydon
950	Norfolk House, 1-28 Wellesley Road	Mixed use development to include retail, residential, office and	125 to 255	Central Croydon



Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
		hotel uses.		
28	Bowyers Yard, Bedwardine Road	Cultural and Creative Industries Enterprise Centre	n/a	Crystal Palace & Upper Norwood
58	140 & 140a Hermitage Road	Residential development	20 to 73	Crystal Palace & Upper Norwood
357	Norwood Heights Shopping Centre, Westow Street	Retail, replacement community use and residential	39 to 223	Crystal Palace & Upper Norwood
59	Garages at rear of 96 College Green and land at Westow Park, Upper Norwood	Residential development	10 to 50	Crystal Palace and Upper Norwood
937	Kempsfield House, 1 Reedham Park Avenue	Residential development	12	Kenley and Old Coulsdon
106	CACFO, 40 Northwood Road	Mixed use residential and community use (to retain equivalent floor space or functionality of the community use)	5 to 20	Norbury
284	Asharia House, 50 Northwood Road	Residential development including replacement community facility	7 to 23	Norbury
951	1485-1489 London Road	Redevelopment for residential and retail	15 to 22	Norbury
30	Purley Leisure Centre, car park and former Sainsbury's Supermarket, High Street	Mixed use redevelopment incorporating public car park, new leisure facilities, including a swimming pool, and other community facilities, healthcare facility, creative and cultural industries enterprise centre, retail or residential accomodation.	30 to 171	Purley

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
35	Purley Baptist Church, 2-12 Banstead Road	Mixed use redevelopment comprising new church, community facility and residential	20 to 111	Purley
61	Car park, 54-58 Whytecliffe Road South	Residential use with retention of car parking spaces	21 to 119	Purley
64	112a and 112b Brighton Road	Residential	14 to 52	Purley
130	1-9 Banstead Road	Residential	77 to 100	Purley
324	Purley Oaks Depot, 505-600 Brighton Road	20 Gypsy and traveller pitches	47 to 175	Purley
325	Telephone Exchange, 88-90 Brighton Road	Conversion of existing building to residential use if no longer required as a telephone exchange in the future	19 to 77	Purley
347	Tesco, 2 Purley Road	Mixed use residential, healthcare facility (if required by the NHS) and retail development	172 to 990	Purley
405	Capella Court & Royal Oak Centre, 725 Brighton Road	Residential development and health facility, and the retention and reconfiguration of existing uses and their floor space with no net loss of flood storage capacity	64	Purley
410	100 Brighton Road	Mixed use residential and retail development	10 to 37	Purley
411	Palmerston House, 814 Brighton Road	Residential redevelopment	4 to 18	Purley
490	95-111 Brighton Road and 1-5, 9-15 and 19 Old Lodge Lane	Primary school (on up to 0.4ha of the site) and residential development, to be brought forward in one phase, and limited retail / food and drink (up to	35 to 130	Purley

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
		existing floor space)		
495	Dairy Crest dairy, 823-825 Brighton Road	Conversion of buildings fronting Brighton Road to studio space (with potential for a Creative and Cultural Industries Enterprise Centre serving Purley) with new light industrial units to the rear	n/a	Purley
683	Purley Back Lanes, 16-28 Pampisford Road	Residential development and public car park including new industrial units to replace those currently on the site	Up to 91	Purley
70	Sanderstead Recreation Ground, Limpsfield Road	Expansion of existing primary school	n/a	Sanderstead
71	2 Red Gables Beech Avenue	Residential development	23 to 47	Sanderstead
79	Waitrose	Mixed use residential and retail development	26 to 54	Sanderstead
306	The Good Companions Public House site, 251 Tithe Pit Shaw Lane	Mixed use of residential and retail	8 to 24	Sanderstead
85	The Forestdale Centre	Residential development incorporating a new shopping parade with retail, finance, and food & drink)	16 to 41	Selsdon
87	Shirley Community Centre	Mixed use development with residential and replacement community facility that provides at least equivalent functionality to the existing centre	20 to 25	Shirley
89	Amenity land	Residential	15 to 20	Shirley

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
	on Fir Tree Gardens			
90	Car park of The Sandrock public house	Residential	Up to 25	Shirley
128	Land at, Poppy Lane	Residential development	51 to 107	Shirley
504	Stroud Green Pumping Station, 140 Primrose Lane	Residential development (including the conversion of the Locally Listed pumping station) if the site is no longer required for its current use in the future	26 to 68	Shirley
101	Toby Carvery, Brantwood Road	Residential development	13 to 35	South Croydon
114	Garage courts at 18 Bramley Hill	Residential	20 to 50	South Croydon
103	585-603 London Road	Mixed use development for residential and hotel (up to existing floor space).	22 to 81	Thornton Heath
105	Strand House, Zion Road	Residential development	12 to 67	Thornton Heath
136	Supermarket, car park, 54 Brigstock Road	Mixed use of residential, retail along Brigstock Road, and employment use	25 to 55	Thornton Heath
149	Tesco, Thornton Heath	Mixed-use development including retail and residential	45 to 254	Thornton Heath
248	18-28 Thornton Road	Residential development	9 to 34	Thornton Heath
326	Ambassador House, 3-17 Brigstock Road	Mixed use conversion comprising residential, retail and community facilities	26 to 145	Thornton Heath
468	Grass area adjacent to, 55 Pawsons Road	Residential development	13 to 45	Thornton Heath
499	Croydon University Hospital Site, London Road	Consolidation of the hospital uses on a smaller area of the site with enabling residential	77 to 290	Thornton Heath

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
		development on remaining part subject to there being no loss of services provided by the hospital in terms of both quantity and quality		
11	Croydon Garden Centre, 89 Waddon Way	Residential development	35 to 94	Waddon
16	Heath Clark, Stafford Road	Secondary School and residential development subject to access from Stafford Road	62 to 128	Waddon
25	Morrisons Supermarket, 500 Purley Way	Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community	251 to 1028	Waddon
48	294-330 Purley Way	Mixed use development comprising retail store, commercial space and residential units	115 to 233	Waddon
110	Old Waddon Goods Yard, Purley Way	Mixed use development incorporating residential, retail and food & drink (with the retail and food & drink elements limited to the current amount of floor space)	39 to 221	Waddon
125	Sainsburys, Trafalgar Way	Mixed use residential and retail development (with retail floor space limited to no more than currently exists on the site)	38 to 141	Waddon
152	Parklife, Purley Way Playing Fields	Multi-purpose leisure facilities	n/a	Waddon
316	PC World, 2 Trojan Way	Redevelopment of this area to a mixture of	47 to 175	Waddon

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
		residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community		
332	Superstores, Drury Crescent	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community	66 to 246	Waddon
349	Harveys Furnishing Group Ltd, 230-250 Purley Way	Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community. As the site is partly within a Flood Zone 3 it will be s	21 to 78	Waddon
350	Wing Yip, 544 Purley Way	Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community	69 to 260	Waddon
351	Furniture Village, 222 Purley Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by NHS) and community uses to form the basis of a new residential community	32 to 120	Waddon
355	Decathlon, 2 Trafalgar Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if	59 to 221	Waddon

Site ref	Name of site	Proposed use	Number of homes (if applicable)	Place
		required by the NHS) and community uses to form the basis of a new residential community		
946	Stubbs Mead Depot, Factory Lane	Mixed residential and employment (industry and warehousing)	157 to 440	Waddon

3.48 National planning policy says that local communities should be able to identify for special protection to green areas of particular importance to them by designating them as Local Green Spaces in Local Plans. By such designations, local communities will be able to rule out new development other than in very special circumstances. Local Green Space is a designation under the planning system that can only be awarded to certain green spaces should they demonstrate meeting the following nationally set criteria:

- Be local in size and not an expansive tract of land;
- Be publicly accessible; and
- Be demonstrably special and have a particular significance to the community it serves.

3.49 In 2016, as part of the preparation of the Croydon Local Plan 2018, the Council tried to gain this extra layer of protection for all of Croydon's parks and green spaces that met the above mentioned criteria. All identified sites were put forward to be designated, however, none of them were granted the Local Green Space designation as the Planning Inspector, appointed by the Secretary of State to review of Local Plan, felt there was not enough local evidence to prove how these spaces were special/important to local communities, or that they hold any particular local significance. In particular he said that *“many of [the characteristics identified by the Council], such as a community garden, children’s play area, natural open space, playing field or recreation ground seem rather commonplace with the consequence that, even where three of these co-exist, the criterion of “demonstrably special” or of “particular” significance within the terms of [national planning policy] is not met.”*

3.50 In preparation for the Local Plan Review, between 4<sup>th</sup> June 2019 to 22<sup>nd</sup> July 2019 the Council asked local residents to tell us which green spaces were special to them and why. The considerable responses received have been reviewed by Officers. In reviewing the responses Officers have had in mind the following comments made by the Planning Inspector who examined the current Croydon Local Plan 2018 in which he said:  
*“A large number of [representations made to the Council about designating particular spaces as Local Green Space] argue for the general benefits of open space to recreation and health. These are undisputed but, by definition, general benefits do not amount to the special justification needed to support Local Green Space designation on a specific site. Others argue for the historic interest of particular places or pointed to their ecological or nature conservation interest. These too cannot be disputed but... the [Croydon Local Plan 2018] already contains policies to protect land with these characteristics. Other*

*[representations] provide pointers to the kind of criteria that the Council may wish to use in the [Local Plan] Review which I recommend... The concept of Local Green Space is not simply about maintaining a quantitative standard of open space or facilities, important though that is; it is concerned with boundaries which are capable of enduring beyond the end of the plan period, i.e., not just ensuring that a sufficient quantity of open space is provided or retained in an area but that it be provided or retained on the particular site in question because its location has particular importance to the local community, possibly as the result of an event on the site or as the result of a campaign of acquisition or gift in relation to the site."*

3.51 Where responses have indicated that there is a feature or use of a green space that is beyond a general benefit; and it is not a feature protected by another Local Plan policy; then they are proposed in the Issues and Options consultation as a possible Local Green Space. The possible Local Green Spaces are set out under each Place, and include the reason that why they might be demonstrably special. However, for each and every possible Local Green Space, to maintain it is a designation more detailed evidence is required. Officers will need to contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

3.52 The table below identifies proposed Local Green Space that have met the demonstrably special criteria. The categories that have been used to identify sites as meeting the requirements of this designation include:

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
Addiscombe Railway Park	This space is actively cared for by the Friends of Addiscombe Railway Park (set up in 2011), who have established a Community Orchard, a Community garden, regular gardening and conservation afternoons and evenings and hold many exciting events in the Park (such as Apple Day in September, Wassail in January, Halloween events for kids) which provide opportunity for the local community to come together, meet, develop a sense of belonging, enjoy and learn about nature, benefit from outdoor activities, reduce loneliness and isolation, and be physically active. It has become a focal point for many in this area. The Park Friends have been active in increasing the biodiversity in the Park and extending tree cover, planting many trees of diverse native species. There are many plans for extending the programme of activities to promote biodiversity and social inclusion and health. In addition there is a strong sense of connection to the railway history of the park.	Addiscombe



Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
Addiscombe Recreation Ground	The local residents assoc (ASPRA) maintain a flower bedded area and the netted areas for ball games and tennis are well used, as is the play area. It's a safe space to let the kids run around as they're never out of sight, and perfect for picnics as it's flat. The scouts and cubs often use it for a run around in the summer when it's too hot inside the church hall. It's a fab park, a little oasis of calm, well used and should be kept that way.	Addiscombe
Ashburton Park	Annual Christmas Market Hosts fairgrounds	Addiscombe
Whitehorse Road Recreation Ground	A community garden has been created in part of Whitehorse Road Recreation Ground.	Broad Green and Selhurst
Coulsdon Coppice	This space is used by a local primary school as part of their curriculum. It is used to provide learning about nature and the environment on an at least weekly basis.	Coulsdon
Coulsdon Memorial Ground	Annual memorial service at the War Memorial. The bowling greens are an important leisure facility for the community. The greens have historical importance, operating from the 1930s. The greens are "open to all". Most such facilities require club membership. Bowling and putting are accessible sports and the greens have wheelchair access. Decades of families in the area have the fondest memories of the greens. Its important that we allow such social history to build into the future. This year the greens have welcomed hundreds of kids from youth groups (e.g. Cubs, guides etc..).	Coulsdon
Park Hill Recreation Ground	The land was gifted to the Borough for the enjoyment of the general public. The walled garden within Park Hill Recreation Ground is maintained by the community as a community garden.	Central Croydon
Wandle Park	Hosts Croydon Pridefest. Music/drama events at the bandstand. It has a great Friend's group who organise lots of events.	Central Croydon
Stambourne Woodland Walk	Attending the friends of Stambourne woods community events are a great way to meet up with local people in a green space. The Conservation group regularly put on very well attended events for local people - educational, recreational. The Conservation group regularly attend the Woods to stop it overgrowing, and maintain access for all those who use it. Scouts and Beavers groups also	Crystal Palace and Upper Norwood

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
	<p>regularly use the space as a valuable teaching resource.</p> <p>It is a critical community asset that recently won an award from the forestry commission as the best community woodland in London (<a href="https://forestrycommission.blog.gov.uk/2019/07/11/ccelebrating-the-tree-oscars/">https://forestrycommission.blog.gov.uk/2019/07/11/ccelebrating-the-tree-oscars/</a>)</p>	
The Lawns	<p>The Friends Group for this woods regularly has work days with both the London Wildlife Trust and The Conservation Volunteers. They clear cherry laurel and holly and the invasive species to clear the way for the more indigenous species to flourish. They recently planted 30 hazel and lime trees with 90 school children in a newly cleared area in the woods. They have litter picking days too.</p> <p>The Great North Woods will be holding their annual Festival there on the 7th September and the Friends group is heavily involved in its planning.</p>	Crystal Palace and Upper Norwood
Westow Park	<p>The Friends of Westow Park organise community workdays here, run free community sports events &amp; helped organise the Crystal Palace Festival here for 3 years.</p> <p>The edible garden is a volunteer community project. Locals meet up on Saturdays to help out and share the produce. It's a good opportunity to learn and meet people.</p>	Crystal Palace and Upper Norwood
Foxley Wood and Sherwood Oaks	<p>Friends of Foxley enhances and manages Foxley Wood for the benefit of local residents and visitors. It works in partnership with the London Borough of Croydon and in consultation with local groups. It manages the wood on behalf of the council in accordance with a 5 Year Management Plan and the activities include path resurfacing, renewing benches and tables, renewing steps, tree planting, creating specialised habitats, wildlife surveying, keeping the network of paths open, cutting firewood, working with other organisations on specific projects and playing a very active role in cattle and sheep grazing regimes. Over the years the Friends of Foxley have organised guided walks, bat walks, corporate work days, activities for uniformed groups and have held 2 open days. The open days proved to be most successful and were very well attended.</p> <p>Children from Roke School go on outings to the woods which are within walking distance of the school. This has provided valuable learning experiences for children who may not otherwise have contact with wildlife and plants. St Nicholas</p>	Kenley and Old Coulsdon/ Purley

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
	<p>caters for pupils with SEN across the borough of Croydon. Our curriculum includes outdoor learning, and Foxley woods provides the ideal environment for our children to go on supervised visits to explore the natural environment, learn about nature and enjoy the sensory experience of being in a woodland environment 5 minutes drive from our school.</p> <p>Scout events (tracking, stalking, camp skills, bivouacs)</p>	
Higher Drive Recreation Ground	Kenley Explorer Scouts regularly use Higher Drive Rec for their activities. Guide groups use this frequently as a hike activity and for learning about nature, identify birds and plants. Churches Together in Purley & Kenley hold a Sunrise Service here every Easter Sunday.	Kenley and Old Coulsdon
Roffey Close/Wontford Road Green	Used for parties and special occasions such as royal events.	Kenley and Old Coulsdon
Biggin Wood	Joining walks organised by the London Wildlife Trust as part of their Great North Wood Project. Biggin Wood is one of the remaining parts of the Great North Wood, described as a fragment of a mighty woodland in South London. A group is trying to get an outdoors educational project (Ofsted registered) at Biggin Woods Park to be able to offer children in the local area childcare from the ages 2 to 5 in nature. It is used by Cubs, Scouts and brownies as well as a Woodland school. Biggin Wood now has an active 'Friends of Biggin Wood' group which has enhanced many aspects in the Wood.	Norbury
Norbury Hall	Maintained by a Friends of Norbury Hall Park group, who have also held Family Fun Days.	Norbury
The Green, Covington Way/Crescent Way	Local residents often meet here to discuss issues in the community, as many are part of the Norbury Residents Association. The green triangle is the core of their annual summer party. It's like their village green and has been for years. They have a very close-knit community between Covington and Crescent Way, thanks to this green.	Norbury
The Green, Semley Road,	The Green, Semley Road, has previously been used as a community space for locals to come together in the spirit of social cohesion to enjoy occasions such as the annual nationwide 'Big Lunch'. This particular event which is held on the green, brings together people in the community of all ages and	Norbury

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
	<p>backgrounds and encourages neighbours to talk and get to know each other. Communication leads to mutual respect amongst fellow citizens, which in turn leads to fewer crimes such as fly tipping in the area. In November 2011 Norbury Green Residents Association used a grant from Croydon council to plant 2000 crocuses on the Green. NGRA found that bringing locals together to work as a team (30 people joined in) provided the area with a sense of community, and the reward, which we are still reaping, is a beautiful splash of colour in this peaceful space every February. The Green was also used recently as a place for the NGRA to create a poppy display in remembrance of the 100 year anniversary of the end of WW1. Again, a very important venture, which was supported by many. Future events planned for the green by NGRA include more 'Big lunches', summer fetes, children's wildlife talks, and 'tea and talk' aimed at the more elderly residents.</p>	
Rotary Field Recreation Ground	<p>The field was a gift to the people of Purley. It is used for many community events including funfairs and circuses, the Purley Festival, annual vintage car show arranged by the local Rotary Club, open air cinemas. Used by Christ Church CoE Primary School for their events and to teach children about nature.</p>	Purley
Woodcote Village Green	<p>The Village Green is a War memorial and hosts the annual Remembrance day service which is widely attended by the local community.</p>	Purley
Green outside post office, Elmfield Way	<p>The park has also been used to host local events such tea parties.</p>	Sanderstead
Purley Beeches	<p>The space is important for local youth groups. 8th Purley Scouts have their colony base very near the Beeches (at St Mary's) and use the Beeches for various activities, from woodcraft to orienteering, summer picnics, water play and many more. It is a nice large space that can accommodate groups of beavers, cubs and scouts without infringing on other local activities.</p>	Sanderstead
Sanderstead Pond (and Green)	<p>The local scout group, 16th Purley, the beavers, cubs and scouts all use the Gruffy weekly for activities. They also run the annual Gruffy Fayre which is seen locally as the 'village' fair and as such is very important for the community. This fayre has been running for nearly 50 years.</p>	Sanderstead

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
Wettern Tree Garden	<p>The Western Tree Garden has a unique collection of trees and shrubs which if they were lost would be an act of vandalism against the wishes of Eric Wettern who created the garden. This is the site established by Mr Wettern who collected tree seeds from around the world to create his Tree Garden - bequeathed to Croydon.</p> <p>It is a local space used for community events as well as annual the Sanderstead Horticultural Summer Show. It has also been used outdoor theatre productions by the Sanderstead Drame Club.</p> <p>Local Brownies group use Wettern Green Gardens to do activities and walks. Beavers and Scouts have always utilised this space for educational purposes and fun hide and seek.</p>	Sanderstead
Freelands Avenue on junction with Tedder Road	<p>This green land is used for communities to have fun days on which brings the community together , fetes are held there by Monks Hill Residents Association . The community all come to these and it is a valuable source of community that helps combat crime in the area when bringing residents together for fun days on that green. The last fete was on Saturday 1st June 2019 when the Mayor and Mayoress of Croydon attended and commented how nice it was to bring the community together on that piece of green for a fete.</p>	Selsdon
Palace Green	<p>The grassed area in the centre of Palace Green is used as a community space for annual community barbecue.</p>	Selsdon
Millers Pond	<p>Friends of Miller's Pond use, maintain and enhance Millers Pond to be an oasis of peace and tranquility readily accessible to Shirley residents. They have raised money through crowdfunding to enhance the park with a new path close to the pond. They have organised and held Millers Pond Fun Day for the benefit of many local organisations such as Girl Guides, Brownies, Townswomens Guilds, who advertise their groups in the local Spring Park Activity News magazine. They have raised money from these Fayres to buy bird/bat boxes and bug hotels for insects to encourage bio-diversity.</p>	Shirley
Playing field and wood Shirley Oaks	<p>This space is used for local events and fairs. It is a community hub and an area that the whole village uses as a focal point. Summer fairs, and community events are held here. It creates a community feel - residents are not confined to their homes and therefore become insular.</p>	Shirley

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
Shirley Recreation Ground	<p>Local Cub/Beaver group uses this park. Have used this space with the Guides - doing local history walks from Shirley Windmill etc. Also visiting local places of interest - home of Flower Fairies.</p> <p>The Bowls Club serves as a focal point for people to meet together for social and physical purposes, bringing many people who are on their own and feeling vulnerable together. If we were to lose this facility it would cause unnecessary hardship in a time when we are asking people to take more exercise to improve their health and lifestyle.</p> <p>The Conservation Volunteers, TCV, are based here. It attracts people from all over the country to learning special skills required for conservation work in natural environments.</p>	Shirley
Spring Park Wood	<p>Working with the Friends of Spring Park Woods, we have kept paths open, planted many trees and created hedgerows for nesting birds put up bird boxes and bat boxes. Recreated the bluebell sights which were overgrown. Monitored any garden waste, i.e. where residents have cut down conifer trees in their gardens and dumped them in the wood. Where nothing would grow underneath. It is so important to keep this space alive.</p> <p>The woods are used to play 'wide games' with local scout group. This involves them having physical exercise and mental challenges.</p> <p>Local Brownie group uses wood on different occasions throughout the year to make observations about the changing of the seasons, the wildlife and to appreciate the vast variety of fauna and flora in the woodland. It has also used the pond for pond dipping activities and the grassland to play rounders in the Summer. They have done scavenger hunts, treasure trails, bark rubbings, leaf identification, mini beast hunts, natural collages, wild flower spotting, bird spotting and orienteering activities in this woodland</p>	Shirley
Temple Avenue Copse	A volunteer group helps to keep the copse clear and tidy for the benefit of all.	Shirley
Haling Grove	This beautiful space is right in the heart of the community it serves and benefits from the investment made in its facilities by the Eleanor Shorter Fund and Friends of Haling Grove. You can attend events organised by Friends of Haling Grove such as Dog Shows, Halloween, St Nicholas Eve and Christmas events.	South Croydon

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
St Peters Churchyard	The Church, St Peter's holds events in the Churchyard every year including a garden fete in June open to all, and often attended by the local Kickboxing Club who give demonstrations at the summer fayre. It is also used for afternoon teas. The church recently held `A big Lunch` event on 1 June for the local community in the churchyard on the lower lawn near the Heathfield entrance.	South Croydon
Heavers Farm Meadow and allotments	Since the Friends of Heavers Farm began clearing the area, it has become a haven for wildlife. The meadow used to be unkempt and full of rubbish. However, now a path has been built, some parts tidied up and rubbish cleared, it's a pretty little hideaway. There is an area of wetland which has flora and fauna not found in other parts of South Norwood.	South Norwood and Woodside
Portland Road Community Garden	The space is maintained & managed by local community group, People for Portland Road. The space has been transformed from unattractive grass into a mini wood with additional trees, wild-flower planting & seating with a stage & is regularly used by a variety of people in the community.	South Norwood and Woodside
South Norwood Recreation Ground	Hosts South Norwood Community Festival every year.	South Norwood and Woodside
Woodside Green	Woodside's war memorial is at one end of the triangular shaped space. It was erected after the first world war. An annual memorial service is held there every year on remembrance Sunday.	South Norwood and Woodside
Grangewood Park	Grangewood Park is a wonderful asset - part of the historic Great North Wood and a hive of wildlife and plant life. It is a quiet, secluded oasis in the heart of a busy local area, and has the benefit of a fantastic Friends group of volunteers who work tirelessly with the local council and other bodies to raise money for park facilities and give their time for gardening, litter picking and a range of community events throughout the year (such as community cinema, events with the Wildlife Trusts, the Friends of Grangewood Park picnics and seasonal events (Halloween, Christmas etc.)). It also hosts Forest School sessions.	Thornton Heath
Thornton Heath Recreation Ground	A local gardening group helps maintain this park, bringing neighbours together and contributing to making the park a pleasant place to spend time and bring people together. The garden now involves a project involving schoolchildren people with learning difficulties and older people	Thornton Heath

Site Name	Reasons why the space may be demonstrably special and of particular significance to the community it serves	Place
Trumble Gardens	It is a good area for Thornton Heath action committee to have events for the community. Also Age UK can use the area for outdoor activities for the over 50s. This park was created a memorial for the second world war from space which was caused by bombing.	Thornton Heath
Whitehorse Meadow	The Friends of Whitehorse Meadow group have been involved in community clean ups and often trim back over growing brambles from the pathways.	Thornton Heath
Layton Crescent	The Layton and Page Crescents' large green spaces have hosted community events in the past and community Christmas Lights.	Waddon

3.53 Just because a green space has not been put forward as a proposed Local Green Space, it does not mean that it is a development site. All green spaces are important; even more so in the context of a need for 46,040 homes by 2039. These new homes will require access to green spaces. Therefore, other green spaces will be protected in the Local Plan review under an 'other green spaces' policy. Many of them will also be part of the green grid network of open spaces proposed in the Green Grid section of this Issues and Options consultation document.

3.54 Those spaces that are proposed to be protected through an 'other green space' designation because they are not Green Belt or Metropolitan Open Land and are not demonstrably special enough to be Local Green Space include the following types of space<sup>2</sup>:

- **Town (or Place) parks and natural open spaces** – These are large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits. The category also includes larger areas of natural open space. They will usually provide recreation for an entire Place and can be up to 20ha in size.
- **Local parks and natural open spaces** – These provide for court games, children's play, sitting out areas and nature conservation areas; or they are slightly larger areas of natural open space. They serve more than the neighbourhood in which they are located, but won't serve an entire Place. Usually they will be under 2ha in size.
- **Neighbourhood parks and natural open spaces** – These also only serve the neighbourhood in which they are located but will be more formal green spaces. They include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas. Generally they are under 1ha in size.

<sup>2</sup> The typologies are taken from the emerging London Plan, Table 8.1



- **Informal green spaces** – These are small areas of informal open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and small amounts of play equipment. Typically they will serve only the neighbourhood in which they are located, and are generally under 0.4ha in size.
- **Linear open spaces** – These are paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.

3.55 The Local Plan review (Issues and Options) lists each of the known Town (Place), Local and Neighbourhood parks and natural open spaces. Informal green spaces and linear open spaces are also proposed to be protected, but they are too numerous to list individually in the Local Plan review. Those spaces listed in the consultation are shown in the table below:

Other green area to be protected by Local Plan review	Type of other green space	Place
Castle Hill Avenue Playground	Neighbourhood parks and play spaces	Addington
Dartnell Road Recreation Ground	Neighbourhood parks and play spaces	Addiscombe
Little Road Playground	Neighbourhood parks and play spaces	Addiscombe
Whitgift Pond	Neighbourhood natural open space	Addiscombe
Boulogne Road Playground	Neighbourhood parks and play spaces	Broad Green & Selhurst
Canterbury Road Recreation Ground	Local park and open space	Broad Green & Selhurst
King George's Field	Local park and open space	Broad Green & Selhurst
Queen's Road Cemetery	Cemetery or church yard	Broad Green & Selhurst
Chaldon Way Gardens	Neighbourhood parks and play spaces	Coulsdon
Land rear of Hilliards Heath Road	Neighbourhood parks and play spaces	Coulsdon
Scrub Shaw	Neighbourhood parks and play spaces	Coulsdon
St James' Church Garden	Neighbourhood parks and	Central Croydon

Other green area to be protected by Local Plan review	Type of other green space	Place
	play spaces	
St John's Church Memorial Garden	Cemetery or church yard	Central Croydon
The Queen's Gardens	Neighbourhood parks and play spaces	Central Croydon
Beaulieu Heights	Town natural open space	Crystal Palace & Upper Norwood
Beulah Hill Pond	Neighbourhood natural open space	Crystal Palace & Upper Norwood
Convent Wood	Town natural open space	Crystal Palace & Upper Norwood
Upper Norwood Recreation Ground	Town Park	Crystal Palace & Upper Norwood
Bourne Park	Local park and open space	Kenley & Old Coulsdon
Former Godstone Road allotments	Local park and open space	Kenley & Old Coulsdon
Green Lane Sports Ground	Other open space	Norbury
Manor Farm nature space	Neighbourhood natural open space	Norbury
Norbury Park	Town Park	Norbury
Pollards Hill	Neighbourhood parks and play spaces	Norbury
Pollards Hill Triangle	Neighbourhood parks and play spaces	Norbury
Alder Way Playground	Neighbourhood parks and play spaces	Purley
Copse Hill Spinney	Neighbourhood natural open space	Purley
Lower Barn Road Green	Neighbourhood parks and play spaces	Purley
Roke Play Space	Neighbourhood parks and play spaces	Purley

Other green area to be protected by Local Plan review	Type of other green space	Place
All Saints Churchyard, Sanderstead	Cemetery or church yard	Sanderstead
All Saints Graveyard, Sanderstead	Cemetery or church yard	Sanderstead
Ashen Grove	Local natural open space	Selsdon
Selsdon Recreation Ground	Town Park	Selsdon
The Ruffet	Local natural open space	Selsdon
Glade Wood	Local natural open space	Shirley
Land to rear of Honeysuckle Gardens	Neighbourhood parks and play spaces	Shirley
Parkfields Recreation Ground	Town Park	Shirley
St John's Church	Cemetery or church yard	Shirley
Normanton Meadow	Neighbourhood parks and play spaces	South Croydon
South Croydon Recreation Ground	Town Park	South Croydon
Apsley Road Playground	Neighbourhood parks and play spaces	South Norwood & Woodside
Brickfields Meadow	Town Park	South Norwood & Woodside
Duppas Hill	Town Park	Waddon
Waddon Ponds	Town Park	Waddon

3.56 The Local Plan review also needs to plan for supporting physical, social, economic and cultural infrastructure.

#### 4. CONSULTATION

4.1 Consultation took place between 4<sup>th</sup> June 2019 to 22<sup>nd</sup> June 2019 for a call for development sites and call for evidence for Local Green Space. The list of site allocations in section 3.46 of this report includes development sites put forward during this consultation. The list of Local Green Spaces in section 3.50 of this report identifies green spaces put forward during this consultation that meet the Local Green Space designation criteria.

- 4.2 Subject to Cabinet's approval, it is proposed that public consultation will take place from 1st November 2018 to 20th December 2018. The consultation will be undertaken in accordance with the Council's Statement of Community Involvement and The Town and Country Planning (Local Planning)(England) Regulations 2012.
- 4.3 The purpose of this consultation period is to receive answers to the questions incorporated throughout the Local Plan Review Issues and Options consultation document, as well as general feedback on the partial review. Representations will be received during the consultation period via post, in person, or via our online platform.
- 4.4 As this is the first round of public consultation on the local plan and is around high-level themed issues and options, Croydon Council is targeting a large audience and as such have planned the consultation events and activities in a way that is inviting and accessible to all – in particular the youth and those who don't normally engage with planning related Council material.
- 4.5 The following is proposed to take place throughout the consultation period:
- Council staff will run eight pop-up stalls in various high street locations;
  - Five interactive exhibitions with activities at various libraries;
  - Two representatively recruited in-depth focus groups;
  - Three in-school workshops with students;
  - Two youth focused workshops;
  - One youth 'mock cabinet' event;
  - One youth stall at an annual youth event;
  - A pilot 'Urban Room' throughout the whole period inside the Whitgift centre on Wednesdays and Saturdays, which will be a drop in session for all.
  - Within the urban room other smaller scale events will take place such as lunch time Q&A sessions and youth drop-in surgeries. There will be a range of activities across the events that will enable input from the community appropriate to the individual level of interest and availability.
- 4.6 Officers will also fulfil the legal Duty to Co-operate and Statements of Common Ground with other councils and relevant authorities.
- 4.7 After the consultation has concluded, the Council will review the submissions received and make necessary changes. We will next consult the public when the proposed submission of the local plan is ready, which will set out our preferred strategic option and proposed new wording of our policies and place specific policies. It is anticipated that the consultation on the proposed submission of the Local Plan review will take place in the autumn 2020.

## **5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 5.1 **Revenue and Capital consequences of report recommendations**  
The consultation on the Local Plan Review Issues and Options consultation document is estimated to cost £165k and will be funded from the Local Plan Review Reserve.

## 5.2 **The effect of the decision**

The decision will commit Croydon to undertake a consultation on the Croydon Local Plan Review (Issues and Options) document. This will be undertaken alongside the South London Waste Plan consultation so expenses will be shared. The costs are estimated to be £165k and include all costs associated with the Local Plan Review (Issues and Options) document, including evidence base assembly, consultation and document production etc.

## 5.3 **Risks**

There is a risk that the Local Plan Reserve which is £235k after this commitment will not be sufficient to accommodate the future project plan for the Local Plan Review. This is needs to be amanged carefully to ensure costs are contained within the funding available.

## 5.4 **Options**

The alternative would be to delay the consultation of the issues and options consultation stage. This would delay the review of the Local Plan and would mean that the final adopted version of the Local Plan review would not meet its current adoption target of before May 2022.

## 5.5 **Future savings/efficiencies**

The project is being funded by the Local Plan Review Reserve, which is carefully managed through the Local Development Framework Board and project manager to ensure the project scope aligns with the budget available.

Approved by Lisa Taylor, Director of Finance, Investment and Risk, S151 Officer.

## 6. **LEGAL CONSIDERATIONS**

- 6.1 The Head of Spatial Planning comments on behalf of the Director of Law and Governance that it is acknowledged this is the first statutory round of consultation and no decisions are made beyond the recommendations.

Approved by Sean Murphy, the Director of Law and Governance & Deputy Monitoring Officer

## 7. **HUMAN RESOURCES IMPACT**

- 7.1 There are no Human Resource impact as the production of the partial review of the Local Plan is set out in the Spatial Plan Service Plan and can be delivered with the current establishment staff level.

Approved by Sue Moorman, Director of Human Resources.

## **8. EQUALITIES IMPACT**

- 8.1 As this is an Issues and Preferred Options document, no policies have yet been finalised so a full Equalities Impact Assessment cannot be undertaken but a screening has taken place to inform the next stage. This is consistent across all four partner authorities. A full Equalities Impact Assessment will be undertaken at the next stage of the plan's production.

Approved by: Yvonne Okiyo – Equalities Manager

## **9. ENVIRONMENTAL IMPACT**

- 9.1 The review of the Local Plan will enable the Council to update their environmental, climate change and green grid policies as a way of addressing environmental impacts. Furthermore, the consultation will coincide with the South London Waste Plan consultation which will enable the partner authorities to effectively plan for waste in a sustainable way. These documents will also be supported by the commissioned Sustainability Appraisal Scoping Report, which further assesses the environmental, social and economic implications of the Local Plan review and how this will help to deliver sustainable development.

## **10. CRIME AND DISORDER REDUCTION IMPACT**

- 10.1 There are no known direct crime and disorder impacts.

## **11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 11.1 Croydon needs to review its existing Local Plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. Planning is critical to ensuring that Croydon meets the needs of all its residents and visitors.
- 11.2 This Local Plan review sets out how Croydon might contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, and ensuring it is developing vibrant places for people to live, work and visit.
- 11.3 For this reason it is recommended to undertake the Issues and Options Consultation on the review of the Local Plan and meet the statutory duty to have an up to date Development Plan.

## **12. OPTIONS CONSIDERED AND REJECTED**

- 12.1 Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and

effectively address the needs of the local community. Therefore, it is not an option not to review the Local Plan.

### **13. DATA PROTECTION IMPLICATIONS**

#### **13.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**YES**

All consultation responses will be held in the Croydon Local Plan consultation database. This will include personal data. This data will need to be held until a date no earlier than 6 weeks after the date on which the Local Plan Review is formally adopted by the Council; or at the conclusion of any application by an aggrieved party to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004; whichever is the later date. This is so the Council can document that the Local Plan Review has been prepared in compliance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning)(England) Regulations 2012.

#### **13.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**YES**

The Director of Planning and Strategic Transport confirms that a DPIA has been completed and signed off and will be kept under review.

Approved by: Steve Dennington on behalf of the Director of Planning and Strategic Transport

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<b>CONTACT OFFICER:</b>	Steve Dennington Head of Spatial Planning, extension 64973
<b>APPENDICES TO THIS REPORT:</b>	Appendix 1 – Local Plan Review – Issues and Options consultation document Appendix 2 – Local Plan Review – Issues and Options (accompanying map) Appendix 3 – Equality Analysis Form Appendix 4 – DPIA
<b>BACKGROUND PAPERS:</b>	Strategic Housing Market Assessment (Draft) Green Belt Review (Analysis against Green Belt tests) (Draft) Green Belt Review (Sites Appraisal) (Draft)

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Croydon Local Plan Review – Issues and Options consultation document

### Foreword:

We have declared a climate emergency, to tackle climate change and improve the environment for residents now and for future generations. A global temperature increase of just 1.5°C will have wide-ranging and damaging impacts to the environment and the council is looking to lead from the front, recognising the climate emergency and working to address it, including through this review. We need more carbon neutral buildings, and we need new developments to be less reliant on the private car than ever before. Also, the importance of trees and green spaces in the borough has never been higher, both as a source of capturing carbon, and reducing temperatures across the borough.

Croydon, as with the rest of the country, is experiencing a housing crisis. Not enough homes have been built over a considerable period to meet the needs of people today. The result is that homes have become increasingly unaffordable for many people, particularly in Croydon, and many families live in homes too small for them, or that are not even permanent. We believe everyone should have a decent home they can afford in a pleasant neighbourhood where they like to live and feel part of the local community

To do this we need a 20-year plan to address climate change, and tackle the housing crisis. The emerging London Plan sets out how London is going to do this for the next ten years, setting higher standards for new buildings, protecting open spaces and planning for 64,935 homes a year to be built across the capital. This is a rate of building not seen since the 1930s. Every borough in London will need to step up to the

challenge of delivering high-quality new homes. As part of that it has given Croydon a target of 29,490 homes by 2029. To take the borough beyond 2029, up to 2039, we know, from the government's standard methodology for calculating housing need, that we need to plan for another 16,550 homes of top of the London Plan target. This means we have to build 46,040 new homes.

We also know there is an overwhelming need for more affordable homes in the borough, and this Local Plan review will set out how the planning system can be used to deliver more, desperately needed, affordable homes.

Croydon, as a council, is committed to delivering these homes in a sustainable manner to help address the housing crisis in Croydon and London in accordance with national, London and local policy. New homes cannot be at the expense of the borough's economy, health and wellbeing of its residents, valued character and future vibrancy and vitality as a place. Valued and important green spaces need protecting and improving. Physical, social and cultural infrastructure, including schools and healthcare, need to be provided to meet the demands of development. Public transport and sustainable modes of travel to serve all the existing and new residents are needed too. This also means continuing to improve our open spaces to enable and encourage walking and cycling throughout the borough.

We will need to do this whilst respecting, enhancing and celebrating the borough's unique character and heritage, creating vibrant civic spaces and public spaces that are

accessible and welcoming to all, and future proofing emerging developments with consideration of digital infrastructure and impact on climate change.

The Croydon Local Plan review is the document that sets out how, through the planning process, we will do this. It outlines three potential strategies on how to tackle climate change, achieve the increase to our housing supply between now and 2039, and it provides an indicative view on how this growth could take place across the 16 Places of Croydon for each option.

We recognise that our current planning policies are still new and many may not need to be reviewed. Therefore, we are asking throughout this consultation how effective our existing Local Plan policies would be at delivering the potential spatial strategies set out in this consultation.

This council believes in people focussed planning, making Croydon a better place to live, work and visit. People focussed planning is about when you step out of your front door to go to the local shop, community hall or school or visiting your Neighbourhood Centre. It is also about when you visit the borough's town centres to work, shop, eat and play; or when you enjoy our diverse cultural and entertainment offer, or our fantastic open spaces.

We are particularly keen on reaching all parts of the community that make up Croydon and are therefore providing a range of consultation and engagement activities. With a richly diverse borough and a multitude of cultures and communities, as well as mix of ages including the largest

number of young people in London, we are creating activities and tools to make the consultation process as accessible and productive as possible. We hope this will allow everyone to participate in this consultation and give us their thoughts on the future of Croydon and work towards producing a Local Plan that continues to seek to eradicate inequalities and to ensure that Croydon is a place where all have the opportunity to live, work and flourish.

I'd like to thank you for getting involved with our review of the Croydon Local Plan, and taking part in the consultation. Together, we can tackle the climate emergency and the housing crisis.

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## Introduction

### What is the aim of the Local Plan Review?

Croydon needs to review its existing Local Plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. Planning is critical to ensuring that Croydon meets the needs of all its residents, workers and visitors. This Local Plan review sets out how Croydon might contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, and ensuring it is developing vibrant places for people to live, work and visit. The review sets out the possible spatial strategies, sites and planning policies necessary to meet these needs, over the period from 2019 to 2039.

Croydon is already one of the most populous boroughs in London and also one of the most diverse in its physical, social and cultural landscape. In addition to its rich diversity, it also has one of the largest youth populations in the capital alongside an increasing elderly population. The Croydon Local Plan 2018 already recognises the diverse population and talent of Croydon. This review seeks to build upon the existing policy framework through planning for older people, accessible homes and the promotion of new housing models to address our changing needs including inter-generational living and community led housing.

Every borough in London will need to step up to the challenge of delivering high quality new homes. Croydon, as with all outer London Boroughs, will need to play a significant role in

providing new homes to address the housing crisis facing us and meet housing need.

The borough has a need for new homes (including affordable homes), jobs and the infrastructure to support them, whilst respecting and enhancing its characteristics and the local context. The Croydon Local Plan 2018 already uses an approach that identifies firstly 16 Places that have been identified by their character heritage and community. How each Place addresses each of these needs and how Croydon will plan to meet them up to 2036 is set out.

In order to adopt this Local Plan review difficult decisions will need to be made as to how Croydon will tackle these issues. Failing to review the Local Plan is simply not an option as, apart from failing to tackle the borough's housing crisis and addressing the causes of climate change, it would mean planning decisions would be taken away from the borough, with the Planning Inspectorate determining an increasing number of planning applications.

### About the Issues and Options consultation

The Issues and Options consultation uses the 16 Places of Croydon to explain how the climate emergency can be addressed and how each place can contribute to tackling the housing crisis in the borough.

At this stage, new policies themselves have not been drawn up; the Issues and Options consultation simply suggests what policies and allocations might be required to deliver the higher levels of growth in the borough.

Sustainable growth of the suburbs is essential in delivering the housing growth we need and will need to be delivered across the 16 Places of Croydon. The necessary physical, social, cultural and economic infrastructure to mitigate the impact of growth will need to be delivered to enable the development of a vibrant and successful borough.

This document sets out three strategic options for meeting housing need. All of them involve some degree of windfall development in the suburbs as this type of development will always form part of the borough's housing supply. However, the options the council is consulting on set out differing amounts of windfall development, and how the overall need for homes can still be met. Each of the options have their own strengths and challenges, as there is no perfect solution to the housing crisis, maintaining economic growth and the climate emergency.

For each strategic spatial option, the proportion of new homes to be built in each of the 16 Places of Croydon is set out in this document. In the final adopted version of the Local Plan review (which will be published in 2022 following an examination of the Plan by an independent planning inspector), it is intended that each of the 16 Places of Croydon will have its own target for the number of homes to be built. With each of the strategic spatial options some areas in the borough are likely to see less growth than envisaged by the Croydon Local Plan 2018, whilst other areas with better accessibility to public transport and local services, as well as the capacity to evolve and change, will see higher levels of

growth. This approach is in conformity with the emerging London Plan.

The council also seeks to protect and enhance green spaces throughout the borough, as well as the green links that connect these spaces, and are therefore trying to identify the most special green spaces, as well as other green spaces that also need protection. This consultation sets out the green spaces that residents have said are the most special to them, and proposes that they be designated as Local Green Spaces, the highest protection that small spaces can get in national planning policy. However, more evidence is required to support the designation of these proposed Local Green Spaces to demonstrate how special they are.

#### [How to use this document:](#)

The Croydon Local Plan Review – Issues and Options consultation document is provided over three sections, all of which can be commented on:

- The Strategic Spatial Options
- Policy areas
- Place Specific Policies

For each section, the key facts, where we want to be, the issues, and they could be addressed through planning policy are provided. A number of questions are then posed for each area. The answers you provide will help us create revised policies.

You do not need to answer questions in each section or answer all questions in a section if your comments have already been addressed.

Answers to questions can be sent to us as follows:

e: [ldf@croydon.gov.uk](mailto:ldf@croydon.gov.uk)

p: Spatial Planning  
Bernard Weatherill House, Zone 6B  
8 Mint Walk  
Croydon  
CR0 1EA

v: Visit us at the Croydon Art Store in the Whitgift Centre every Wednesday, Thursday, Friday and Saturday during the consultation period

The consultation runs from 1 November to 20 December 2019 (inclusive).

### Next Steps

The council is currently consulting on this document, as part of the issues and options consultation, which seeks to review the Croydon Local Plan 2018. The issues and options consultation is your first chance to comment on the review of the local plan and is where the council sets out the issues that it is facing and proposes strategic options as to how to address this. This is a key opportunity for feedback and engagement as part of the plan-making process.

You have the opportunity to comment on the strategic spatial options set out in this document, as well as the policy areas

and place specific policies, which follow on in the document. To assist, questions have been posed at the end of the each section.

After the consultation has concluded, the council will review the submissions received to develop a preferred strategic option and draft wording of the proposed local plan. This will be published in autumn 2020, at which point you will be able to comment on the draft plan. All those comments will be sent to a Planning Inspector appointed by the Secretary of State for Communities and Local Government. The Planning Inspector will decide what changes need to be made to the Local Plan review in order for the council to adopt it.

The council is aiming to adopt the Local Plan review in winter 2022.

### Did you know

- Every council has to have a Local Plan and carry out regular reviews – if not the Government can intervene. Additionally, without a Local Plan, development would have no local guidelines to abide by and the council would have limited power to negotiate with applicants.
- Reviewing a Local Plan is a three year process, with two separate periods of public consultation.
- Once a council has written a plan, or review, it must go through an examination. This is where a Planning Inspector appointed by the Secretary of State analyses the document to ensure it accords with the national policies and the London Plan. The Planning

Inspector can approve or reject sections of the council's plan or the plan in its entirety.

- The Local Plan must prove that the council has sufficient land for the future housing need.



## Setting the scene

### Historical context

Croydon historically was a market town, providing key trading links between London and the south coast. The presence of the Archbishop's of Canterbury – with a residence in the Old Town since medieval times - provided additional status.

Outlying medieval villages were located at Woodside, Addington, Sanderstead, and Coulsdon, supplemented by Broad Green, Woodside and Thornton Heath in the prosperous 18<sup>th</sup> century.

Construction of the Croydon Canal (1802-9) and pioneering Surrey Iron Railway (1801-3) created new links for thriving manufacturing industries such as those along the Wandle Valley. It was however the arrival of railway connections to London and Brighton in the mid 19<sup>th</sup> century which fundamentally changed the borough's character, as it became possible to commute to central London. New railway stations and tramlines following this promoted rapid development of town centres and surrounding residential suburbs at Thornton Heath, Norbury, South Norwood, Purley and Coulsdon.

Croydon was incorporated as a borough in 1883 and with subsequent civic enthusiasm rebuilding took place across its towns, including new buildings and parks. By 1914, the borough had become contiguous with central London.

The world's first international airport terminal was built in 1920 at Croydon Airport on Purley Way (the original London airport); resulting in the subsequent development of industry to the west of the town. The suburbs also expanded further to

the south and south eastern edge of the borough, which became newly accessible by car. As a consequence, areas of the countryside were developed for house building, a trend that stopped with the introduction of the Green Belt in 1955.

The town experienced its most dramatic transformation following the Croydon Corporation Act of 1957, with a post-war 'Modernist' vision of a spacious, efficient, transport-led city. Redevelopment led to an unparalleled office boom, with almost 500,000m<sup>2</sup> of office space built or given permission in the town between 1957 and 1964. The Whitgift Foundation relocated their school between North End and Wellesley Road to allow development of a large new shopping centre. Wellesley Road itself was transformed into an urban motorway.

From the 1970s, however, Croydon Town Centre suffered a period of gradual decline as the Modernist vision fell out of favour and with the launch of a new office district at Canary Wharf. Central government's increased emphasis on out of town shopping areas through the 1980's and 90's resulted in a new retail area growing along the A23 (Purley Way).

Croydon is changing the reputation it received as a result of its post-war development endeavours. As it became clear that the vehicular transport system previously central to the modernist vision was unsustainable, new public transport infrastructure was developed as part of a new vision. The new East Croydon railway station was opened in 1992 and the Croydon Tramlink (introduced 2000) provided improved east-

west links. A series of detailed masterplans have already been drawn up for Croydon Town Centre and support the current Croydon Local Plan 2018. These lie at the heart of a new wave of transformation across the Town Centre.

### Croydon in 2019

Croydon is unique. From historic market town and residence of the Archbishops of Canterbury to dynamic Victorian County Borough and booming 60s commercial centre, a strong sense of civic identity and ambition runs through Croydon's history. By 2019, Croydon as a borough had many strengths and opportunities. It also had its challenges, including that of accommodating significant residential growth, whilst respecting local character.

Croydon already has all the right ingredients. It is London's biggest borough and has the largest youth population in London. It is one of the top retail and commercial centres in London and enjoys some of the best transport connections in the UK, with London's only tram system; 15 minute rail connections from East Croydon Station to central London, only 20 minutes to Gatwick and connections to London Overground at West Croydon.

The borough is renowned for its long and rich cultural history, including fostering the birth of Punk, Dubstep and Grime. Institutions such as The Fairfield Halls, Croydon Art College, and the Brits School have fostered and showcased world class creative talent including David Bowie, Amy Winehouse, Kirsty MacColl and Bridget Riley. Croydon plays host to an increasing number of festivals and events, celebrating its

diverse mix of cultures; in December 2018, Croydon was named as one of the Mayor of London's first Creative Enterprise Zones (CEZ) to further establish it as a place where creative industries flourish and grow. The newly refurbished Fairfield Halls lies at the centre of the emerging Cultural Quarter acting as a further catalyst for culture within the borough.

In Croydon's Town Centre, the borough has more shops in one location than anywhere else in London apart from the West End itself. However, in 2019 they faced stiff competition from other centres such as Bromley, Wimbledon, Kingston and Bluewater. The Town Centre had more office floor space than anywhere else in South London and neighbouring districts in Surrey, but many of the offices in Croydon were seen as dated and vacancy had increased. The challenge for the Croydon Local Plan includes rejuvenating a dated Croydon Town Centre and growing a new residential community and jobs. Improvements to the public realm in the Town Centre to attract shoppers, employers, workers and new residents are vital to its regeneration and future vitality. Significant progress has begun for example the Ruskin Square development around East Croydon Station which will deliver up to with almost 400,000m<sup>2</sup> of Grade A office space complemented by over 600 new homes and associated retail and dining space. Currently this development is partly occupied is just under a quarter the size of Canary Wharf alone. Additionally, in 2014, Croydon's Town Centre was designated only the second Growth Zone nationally. This released over £500M to finance and deliver a major

regeneration programme to unlock further growth in the centre and beyond.

The Purley Way faces new challenges. The employment areas along it are prime locations, owing to their accessibility to the M25 and the rest of London. The Mayor of London's London Plan recognises the demand for industrial premises in Croydon by designating Purley Way and Marlpit Lane as Strategic Industrial Locations<sup>1</sup>, and by categorising Croydon as a borough where the loss of industrial land should be resisted. The challenge for the Local Plan is to protect and enhance these sites whilst providing a mix of uses that work successfully together. This mix must include substantial residential development along the Purley Way to help address the borough's urgent housing need. Traffic congestion remains an issue and so development will need to create welcoming places that are not dominated by traffic.

In 2011 the borough ranked as the 14<sup>th</sup> least deprived borough in London<sup>2</sup>, (out of 33 authorities). Deprivation levels, however, differ greatly, with greater concentrations in the north of the borough and in the places of Addington and Shirley. In general, the south and east of the borough incorporate some of the least deprived areas of London. The challenge for the Strategic Policies is to reduce social,

economic and environmental deprivation, look at measures to reduce unemployment, improve skills and education, community and environmental conditions and renew housing.

By 2019 Croydon was the second largest borough in London in terms of population<sup>3</sup>. Croydon is home to 396,837 people<sup>4</sup> and this is expected to increase to just under 500,000<sup>5</sup> by 2050. They will need to have homes in which to live.

Demographically, Croydon is a young borough and in 2019 just under a quarter of its residents were under the age of 17 (Source: PHE Profile and ONS, MYE, 2016). However, the residents of the borough are getting older and by 2031 the number of people in Croydon over the age of 65 will have increased by 41%. This will impact the types of homes needed in the borough and the infrastructure required to support an aging population. In contrast, the population aged between 20 and 64 will have increased by just 2.5%<sup>6</sup>. By 2031, Croydon will also be a more diverse borough with over half of the population being a member of a black and minority ethnic community, compared to 36% in 2016<sup>7</sup>. The challenge for the Strategic Policies is to meet the needs of the population growth, the aging population and the cultural diversity.

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<sup>1</sup> Strategic Industrial Locations are the most important industrial areas in London as identified by the Mayor of London in the London Plan. There should be strong protection for industrial and warehousing uses in Strategic Industrial Locations.

<sup>2</sup> Index of Multiple Deprivation 2010 - Local authority summaries

<sup>3</sup> GLA, London Area Profiles

<sup>4</sup> Housing led projection age range creator 2016 incorporating data from the 2016 SHLAA

<sup>5</sup> GLA Central Trend-based projections, 2016

<sup>6</sup> GLA 2010 Round Population Projections

<sup>7</sup> GLA 2009 Round Ethnic Group Population Projections

The Green Belt around Croydon together with the protection of open spaces elsewhere in the borough has ensured that over a third of the borough is open space. Whilst this is an asset, it is also a constraint for the borough as it limits the land available for new homes to house Croydon's growing population. The open space is unevenly distributed in the borough creating some areas, mainly to the north, with degrees of deficiency in access to nature and/or open space. The challenge for the Croydon Local Plan is to ensure access and quality of existing open space is improved whilst making the most of the natural resources and adapting to climate change.

## Vision

The Croydon Local Plan Review vision builds upon the Croydon Corporate Plan 2018-2022 which identifies what success will look like and what the council will do to implement this. The Corporate Plan has been used as, compared to the Croydon Community Strategy 2016-21, this is the most up to date document to refer to.

Croydon's vision is to be:

Objective	What does success look like?	What we will do
<b>People live long, healthy, happy and independent lives</b>	<ul style="list-style-type: none"> <li>• Croydon becomes a more equal place that celebrates its rich diversity</li> <li>• Happy, healthy and independent lives are lived by as many as possible, for as long as possible</li> <li>• Access to effective health services and care services when needed</li> </ul>	<ul style="list-style-type: none"> <li>• Support the development of a culture of healthy living with high quality public realm that facilitates sustainable transport, walking and cycling</li> <li>• <i>Support and delivery high quality, sustainable design and placemaking for the built environment</i></li> <li>• Improve and reduce differences in life expectancy between communities</li> </ul>
<b>Our children and young people thrive and reach their full potential</b>	<ul style="list-style-type: none"> <li>• Children and young people in Croydon are safe, healthy and happy, and aspire to be the best they can be</li> <li>• Every child and young person can access high quality education and youth facilities</li> <li>• Getting more young people involved in taking part in local democracy and in tackling the issues that matter most to them</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure there are high quality school places for Croydon's increasing numbers of children and young people</li> </ul>
<b>Good, decent homes, affordable to all</b>	<ul style="list-style-type: none"> <li>• New homes are well designed, built for all needs, including genuinely affordable, well designed homes</li> <li>• Quality homes – more existing homes are decent and meet people's needs</li> <li>• Homes for everyone – all have the opportunity to access a suitable home and</li> </ul>	<ul style="list-style-type: none"> <li>• Build 2,000 homes that give priority to Croydon residents</li> <li>• Return at least 100 vacant properties back into use</li> <li>• Renew the landlord licensing scheme beyond 2020 and increase the number of properties registered</li> </ul>

Objective	What does success look like?	What we will do
	<p>avoid homelessness, with no one forced to sleep on the streets</p> <ul style="list-style-type: none"> <li>Standards are improved in the private rented sector</li> </ul>	<ul style="list-style-type: none"> <li>Purchase 250 street properties for families in need with truly affordable rent and security of tenure</li> <li>Develop our Homelessness Prevention Strategy and assist and enable our residents to secure accommodation, supporting vulnerable residents to increase resilience and independence</li> <li>Work with the Mayor of London to ensure affordable housing in new developments</li> <li>Raise design quality and sustainability</li> </ul>
<b>Everyone feels safer in their street, neighbourhood and home</b>	<ul style="list-style-type: none"> <li>Working in partnership to reduce crime; including serious youth violence, domestic and sexual violence, and hate crime.</li> <li>Anti-social behaviour is reduced throughout the borough, through work with partners and local community involvement.</li> <li>Public protection to ensure that residents and visitors are safe and that businesses are operating effectively to minimise risks</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that licensing and regulation systems are effective and reduce the risk of harm to the public</li> </ul>
<b>A cleaner and more sustainable environment</b>	<ul style="list-style-type: none"> <li>Increase education and information to improve individual responsibility for waste, and to encourage reports of fly-tipping</li> <li>Improved air quality, especially at or near schools</li> <li>Croydon's recycling rate is increased and the use of plastics is reduced</li> <li>Improve design and quality of public realm</li> </ul>	<ul style="list-style-type: none"> <li>Delivery of our Air Quality Action Plan to tackle idling vehicles, in particular around schools</li> <li>Plant 3,500 new trees by 2023 in streets and open spaces</li> <li>Continue to improve the design and quality of public spaces, integrating sustainable transport, walking and cycling and links to the green grid</li> </ul>

Objective	What does success look like?	What we will do
<b>Everybody has the opportunity to work and build their career</b>	<ul style="list-style-type: none"> <li>• More businesses pay the London Living Wage, employ local and buy local</li> <li>• More residents and businesses benefit from the regeneration and investment being made in Croydon</li> <li>• More residents can develop their skills through apprenticeships, academic and technical courses</li> </ul>	<ul style="list-style-type: none"> <li>• Create guidance to facilitate and enhance the Green Grid</li> <li>• Create the environment for thousands of new job opportunities to be made available to local people</li> <li>• Increase apprenticeships and learning opportunities for all of our residents, particularly young people, the homeless, care leavers and people living with a disability or long-term condition</li> <li>• Work towards establishing a university campus in Croydon</li> </ul>
<b>Business moves here and invests, our existing businesses grow</b>	<ul style="list-style-type: none"> <li>• Transport, digital and social infrastructures are effective and support economic growth</li> <li>• Small and medium enterprises and entrepreneurs thrive in an open and supportive environment</li> <li>• Local communities and high streets benefit from economic growth and flourish</li> </ul>	<ul style="list-style-type: none"> <li>• Promote 'Croydon is Open' to realise more investment into Croydon</li> <li>• Deliver the new town centre with new retail, jobs and homes</li> <li>• Ensure excellent broadband is available to Croydon businesses</li> <li>• Develop plans relevant to every local high street along with our Business Improvement District partners</li> <li>• Increase the number of businesses in the borough and support existing business for sustainable economic growth.</li> </ul>
<b>An excellent transport network that is safe, reliable and accessible to all</b>	<ul style="list-style-type: none"> <li>• A reliable public transport system that ensures safe and convenient travel</li> <li>• Easy, accessible, safe and reliable, making it more convenient to travel between Croydon's local Places</li> </ul>	<ul style="list-style-type: none"> <li>• Partner with Transport for London and Network Rail to improve public transport links to our local high streets, including introducing new bus routes to better connect Croydon's Places</li> </ul>

Objective	What does success look like?	What we will do
	<ul style="list-style-type: none"> <li>• Less reliance on cars, more willingness to use public transport, walk and cycle</li> </ul>	<ul style="list-style-type: none"> <li>• Lobby for the expansion of the tram up to Crystal Palace and tram extensions to other parts of the borough and beyond</li> <li>• Invest in 400 electric vehicle charging points across the borough</li> <li>• Expand 20mph zones and tackle congestion around schools</li> <li>• Invest in safe cycle lanes between central Croydon and local centres</li> </ul>
<p><b>We value the arts, culture, sports and activities</b></p>	<ul style="list-style-type: none"> <li>• Croydon’s cultural offer enhances our town and creates places where people want to live, work and visit</li> <li>• Good, affordable and accessible arts, sports and leisure facilities enable people to be as active and healthy as they want to be</li> <li>• Our parks and open spaces are safe, pleasant, thriving places where everyone can exercise and have fun</li> </ul>	<ul style="list-style-type: none"> <li>• Reopen Fairfield Halls with a diverse year-round programme</li> <li>• Open a new leisure centre in New Addington</li> <li>• Develop a Creative and Cultural spatial masterplan to facilitate infrastructure for all parts of creative and arts industries including learning, production, exhibition and business development</li> <li>• Develop more outdoor active gyms and other sports facilities in parks</li> </ul>



## Strategic Options:

### Did you know?

- Croydon is currently meeting its existing housing target set in the Croydon Local Plan 2018 of 1,645 per annum.
- In the current Croydon Local Plan, 54% of all the proposed housing, is on just 1% of the borough's land.
- However, the current 2018 housing target of 32,890 homes by 2036 is less than the need for new homes in Croydon, which is 46,040 homes between 2019 and 2039
- 46,040 new homes equates to one new home for every three existing homes in the borough. Another way of looking at it is that it would require 85 towers of the size of that being constructed on the site of the former Essex House opposite East Croydon station to deliver the same number of homes.
- The emerging London Plan sets housing targets for the next ten years for all London boroughs, that combined will meet the need for new homes in London (66,000 per annum).
- In Croydon the target for new homes between 2019 and 2029 set by the emerging London Plan is 29,490 new homes.
- There is 2,847ha of protected open space in the borough (which is almost a third of the entire borough)
- However, many of these open spaces are disconnected from other open spaces in the borough
- There are currently 0.89 cars per household in Croydon, and only 51% of journeys in the borough are made on foot, by cycle or using public transport
- The existing tram network in Croydon spans 17.26km in the borough, and overall the tram network is the fourth busiest light rail network in the UK. To date it has never been expanded since it first opened in May 2000 unlike many other tram systems across Britain, Ireland and mainland Europe.

## How can we deliver 46,040 homes between 2019 and 2039

This consultation presents three strategic options for delivering 46,040 homes in Croydon between 2019 and 2039. They each represent a particular, and distinct way of meeting housing need. Subject to the responses to this consultation it may be that the solution to the problem of meeting the borough's housing need lies in a combination of two or all three of these options rather than one option in particular. Through this consultation the council is trying to establish what local residents, businesses and developers think the opportunities and challenges are for each option. The aim is to then develop a preferred option to be presented as part of the draft Local Plan review when it is published in autumn 2020.

### Key aims across all 3 strategic options

Below are a set of key aims which are applicable to all three strategic options:

- Promote and facilitate sustainable and active modes of travel;
- Develop a high quality public realm that is welcoming, safe and accessible to all;
- Protect the borough's most special green spaces as Local Green Spaces, and apply policy protection to other green spaces as well; facilitate their enhancement;
- Seek to create a connected network of green spaces and biodiversity corridors (a Green Grid including but

not limited to a biodiversity network, walking network and cycling network) from north to south in the east of the borough, and another in the west (including along the Purley Way);

- Develop more detailed guidance to facilitate the green grid;
- Supporting Network Rail to deliver the Croydon Area Remodelling Scheme which seeks to increase rail capacity through East Croydon by removing one of the most challenging bottlenecks on the British rail network (at Selhurst Triangle); and
- Promote the expansion of Croydon's tram network to help reduce dependence on the use of the private car in the borough, improve connectivity and quality of life and to support the growth in homes including finding a site for a new tram depot to support expansion of the network and seeking the following potential tram extensions/rapid transit routes to the existing network:
  - New Addington from its current terminus towards the southern end of New Addington and Biggin Hill;
  - Croydon Town Centre – Brighton Road – Purley;
  - Purley – Coulsdon;
  - Ampere Way – Purley Way – Purley;
  - Croydon Town Centre – London Road – Norbury;
  - Croydon Town Centre – Crystal Palace
  - Sandilands – Sanderstead;
  - South Croydon – Selsdon – Addington Village – Hayes;

- Sandilands – Bromley; and
- Croydon Town Centre – Sutton;
- Through the delivery of increasingly carbon neutral homes, that promote the use of alternatives to the private car, in order to address the Climate Emergency in the borough;
- Promoting more digital connectivity and faster broadband to enable more home working;
- Continue to promote the redevelopment and regeneration of Croydon’s Town Centre, and in particular the development of its retail core;
- Protecting and future proofing Croydon’s industrial areas, through resisting the loss of quality floor space, and promoting the redevelopment and intensification of lower quality spaces; and
- Protecting the highest quality office spaces in Croydon Town Centre, and seeking the provision of new Grade A offices in developments around East Croydon station.

### How do the three strategic options differ?

**Strategic Spatial Option 1** is an environmentally and economically sustainable option but would have the greatest impact upon existing residential neighbourhoods. In it all

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<sup>8</sup> Meaning that whilst houses might be replaced by flats, for example, the new buildings will still be in keeping with the character of the area

<sup>9</sup> Meaning that new buildings will be of a different character to the area at present to allow for a more intensive form of residential development. Note

residential growth takes places in the existing urban area with growth delivered as follows:

- There are 5,370 homes already under construction in the borough;
- A third of all new homes will be in Central Croydon, mostly on larger developments;
- A sixth of all new homes will be on ‘allocated’ sites or sites with an existing planning consent away from Central Croydon and the Purley Way;
- About 10% of new homes will be in the Purley Way area as part of a comprehensive regeneration of the retail parks along the Purley Way;
- No Green Belt release except for supporting infrastructure (such as schools or a new tram depot);
- Continued protection for Conservation Areas, Local Heritage Areas and all other heritage assets and their settings; and
- Smaller ‘windfall’ sites will accommodate about 40% of all new development in the borough, achieved through a combination of ‘evolution of character’<sup>8</sup> in most areas of the borough; and intensification of development in areas where homes are built on large plots and are within 800m of a train station or tram stop, resulting in a gradual change of character<sup>9</sup>.

that there will be no change of character in Conservation Areas or Local Heritage Areas, and neither would the council permit a change of character where this would affect Listed Buildings or their settings.

**Strategic Spatial Option 2** is an environmentally and socially sustainable option but would probably be the hardest to deliver as it is the most reliant on large, complex development sites to deliver. In it more growth is focussed on the Purley Way area to reduce the pressure on the suburbs of Croydon. It differs from Option 1 as follows:

- There are 5,370 homes already under construction in the borough;
- A third of all new homes will be in Central Croydon, mostly on larger developments;
- A sixth of all new homes will be on ‘allocated’ sites or sites with an existing planning consent away from Central Croydon and the Purley Way;
- The development of a radical vision and delivery focussed masterplan for the Purley Way transformation area to accommodate up to 12,000 homes along the Purley Way through high density residential and commercial/retail developments, whilst ensuring that:
  - The borough’s most valued and protected commercial locations are respected;
  - Wider infrastructure is developed to enable good growth<sup>10</sup> and a vibrant place; and
  - A jointed up, welcoming and accessible public realm is created that delivers a shift away from a car-led place towards a more pedestrian and cyclist friendly collection of neighbourhoods;

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<sup>10</sup> Includes reducing car dominance, providing inclusive access to public transport, creating well connected communities and uses the “Healthy Streets” approach (Mayor of London, Good Growth by Design 2017).

- No Green Belt release except for supporting infrastructure (such as schools or a new tram depot);
- Continued protection for Conservation Areas, Local Heritage Areas and all other heritage assets and their settings; and
- Smaller ‘windfall’ sites will accommodate about a quarter of all new homes in the borough. Mainly this will be through evolution of existing character, although some areas close to services with good public transport accessibility may see some intensification.

**Strategic Spatial Option 3** is an economically and socially sustainable option but with the greatest impact on green spaces in the borough as it involves a limited release of Green Belt land for residential development to reduce the pressure on the suburbs of Croydon. It differs from Options 1 and 2 as follows:

- There are 5,370 homes already under construction in the borough;
- A third of all new homes will be in Central Croydon, mostly on larger developments;
- A sixth of all new homes will be on ‘allocated’ sites or sites with an existing planning consent away from Central Croydon and the Purley Way;
- Limited release of Green Belt in New Addington, Selsdon and Sanderstead for 5,300 homes (including

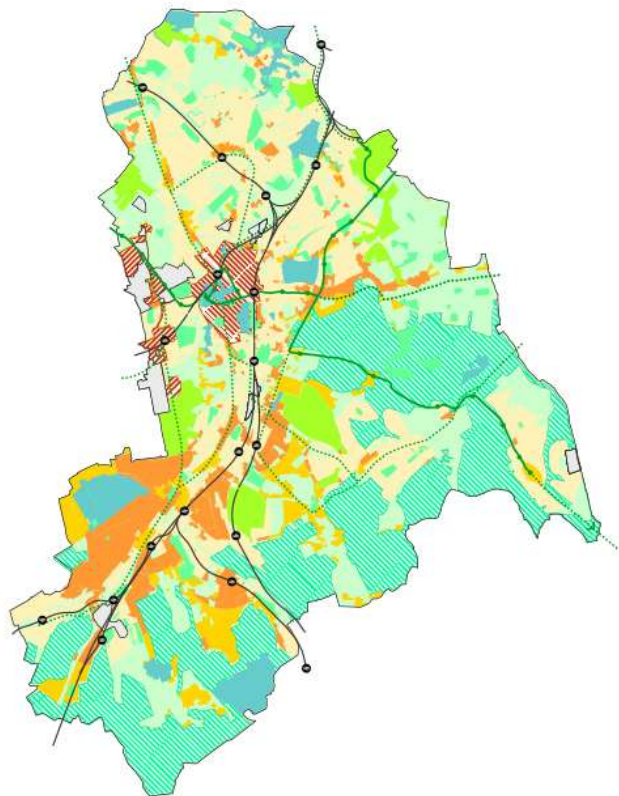
masterplans for each site), in place of a radical redevelopment of the Purley Way;

- 10% of new homes will be in the Purley Way area as part of a comprehensive regeneration of the retail parks along the Purley Way; and
- Continued protection for Conservation Areas, Local Heritage Areas and all other heritage assets and their settings; and
- Smaller 'windfall' sites will accommodate about a quarter of all new homes in the borough. Mainly this will be through evolution of existing character, although some areas close to services with good public transport accessibility may see some intensification.



## Strategic Spatial Option 1: An environmental and economically sustainable option

### Strategic Options 1.



Opportunities:

- This option is the would probably deliver more homes, in the shortest space of time as it is not wholly reliant on large and complex developments to meet the borough's housing need.
- It complies with national and regional planning policy.
- It is not overly reliant on large volume housebuilders to deliver homes (meaning there is less risk in Croydon falling behind on its housing targets and needs).
- No loss of Green Belt except for supporting infrastructure.



### Challenges:

- It will result in changes in character in some parts of the borough where existing homes are built on large plots of land, particularly where they are located in accessible locations (within 800m of a Town Centre, train station or tram stop, or with higher levels of public transport accessibility).
- With higher density forms of housing in some areas of the borough than currently exist there, some areas will change more significantly.
- This option would disperse the pressure on roads and transport infrastructure, which may make it more difficult to deliver the infrastructure needed to support growth as it new infrastructure would be required in many more locations in the borough.
- This option would present challenges for the council's development management service (who determine planning applications).
- There might limited demand for the type of housing produced by this option (flatted developments in suburban locations).

### Homes by Place (2019-2039)

<b>Place</b>	<b>Total</b>
Addington	280 to 350
Addiscombe	1,480 to 1,880
Broad Green & Selhurst	950 to 1,140
Coulsdon	2,050 to 2,490

<b>Place</b>	<b>Total</b>
Central Croydon	12,830 to 14,510
Crystal Palace & Upper Norwood	480 to 670
Kenley and Old Coulsdon	2,000 to 2,480
Norbury	540 to 670
Purley	7,260 to 9,390
Purley Way transformation area	2,900 to 4,470
Sanderstead	1,670 to 2,070
Selsdon	870 to 1,070
Shirley	360 to 460
South Croydon	890 to 1,070
South Norwood & Woodside	460 to 520
Thornton Heath	1300 to 1,620
Waddon	550 to 680
Already under construction	5,370
<b>Borough totals</b>	<u>At least 46,040 new homes across the borough</u>

### How Places will change between now and 2039

Places will change depending on their local character, their accessibility to services and public transport, the ability to respect and protect the significance of heritage assets and the ability to deliver commensurate physical and social infrastructure to mitigate growth. The drawings below explain how places will change.

**Protect**

Respect and protection of heritage assets in Conservation Areas and Local Heritage Areas.



2019



2039

### Evolution

Applies to most residential areas in the borough except Conservation Areas, Local Heritage Areas and those areas on large plots of land. These areas that are farther from public transport or a Town Centre will see less change than more accessible and sustainable locations. Under evolution it is expected that up to 1 in every 1,000 homes would be redeveloped in any given year.



### Moderate intensification (Developing an area's local character)

Applies to areas with inconsistent character (which have their own Place Specific Policy in the Croydon Local Plan 2018); or to suburban areas with large plots of land, but farther than 800m from a train station, tram stop or Town Centre. Under moderate intensification in residential areas it is expected that about 1 out of every 285 existing homes, on average, would be redeveloped in any given year.



**Focused intensification (Intensification created by an increased efficiency in use of resources and the expansion of existing and new higher density character types)**

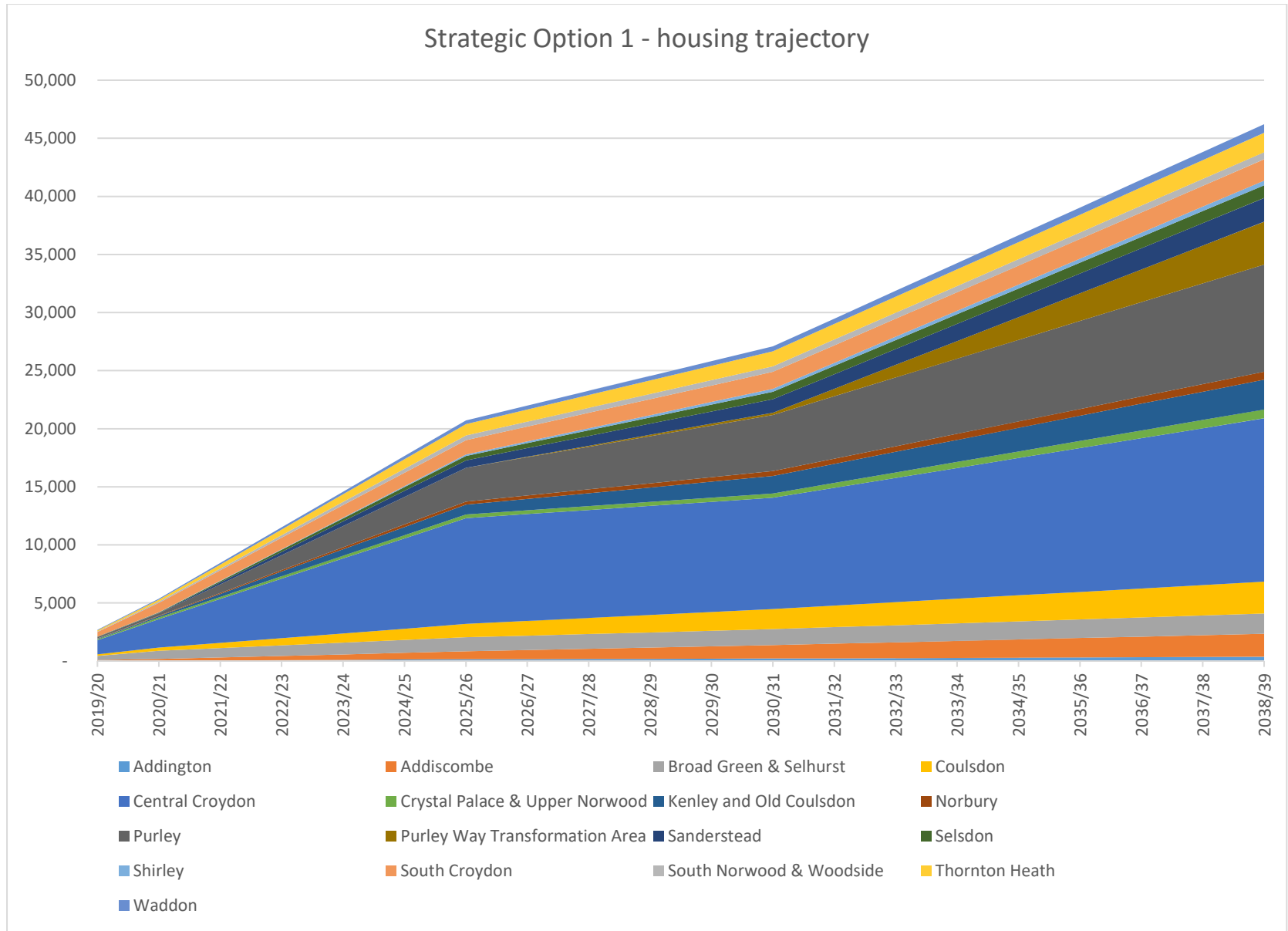
Applies to suburban areas with large plots of land and within 800m of Croydon Town Centre, other Town Centres, a train station or a tram stop, or with a PTAL of 3 or above. Also applies to existing areas of Focused Intensification in the Croydon Local Plan 2018 (excluding Forestdale). Under focussed intensification in residential areas it is expected that 1 out of every 130 existing homes, on average, would be redeveloped in any given year.



**Transformation**

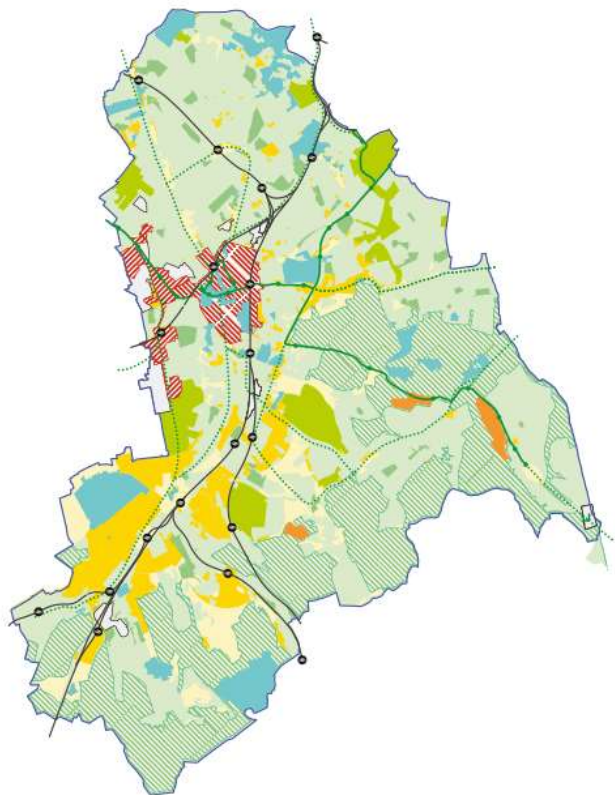
Applies to Central Croydon and the Purley Way.





## Strategic Spatial Option 2: An environmentally and socially sustainable option

### Strategic Options 2.



#### Opportunities:

- This option also has the potential to reduce the pressure for development on many of the borough's existing suburbs.
- The Purley Way has the potential to deliver a significant number of homes and mixed use development if a very high density form of development is taken forward.

### Challenges:

- This level of development along the Purley Way could impact on the important functions of the adjacent strategic industrial areas, although this impact will need to be managed/mitigated given the economic importance of the strategic industrial areas.
- Both Central Croydon and Purley Way would be redeveloped using a similar form of development and it is unknown if there is a big enough market for over 20,000 homes of similar types in Croydon.
- Developers and landowners may not want to develop 20,000 homes of the types found in Central Croydon and would be expected in the Purley Way area. New typologies of high density mixed use developments and places will need to be developed which may not be fully tested.
- Changing a major road to a residential neighbourhood with the consequential impacts on traffic and cost of mitigating against air quality issues.
- Developing infrastructure that allows both pedestrian and cyclist focused residential development and HGV reliant industry to successfully coincide in the same area.
- There is a significant risk that if developers did not build at the required rate, then Croydon's suburbs could still be under great pressure from development.



## Homes by Place (2019-2039)

<b>Place</b>	<b>Total</b>
Addington	190 to 230
Addiscombe	1,030 to 1,310
Broad Green & Selhurst	890 to 1,070
Coulsdon	1,460 to 1,760
Central Croydon	12,830 to 14,510
Crystal Palace & Upper Norwood	420 to 600
Kenley and Old Coulsdon	1,380 to 1,710
Norbury	360 to 450
Purley	5,400 to 7,060
Purley Way regeneration area	9,430 to 12,000
Sanderstead	1,170 to 1,450
Selsdon	580 to 710
Shirley	360 to 450
South Croydon	680 to 810
South Norwood & Woodside	350 to 380
Thornton Heath	1,190 to 1,490
Waddon	440 to 550
Already under construction	5,370
<b>Borough totals</b>	<u>At least 46,040 new homes across the borough</u>

the ability to deliver commensurate physical and social infrastructure to mitigate growth. The diagram below explains how places will change. Overall there will be less change to the existing urban area with this strategic option compared to Strategic Option 1.

## How Places will change between now and 2039

Places will change depending on their local character, their accessibility to services and public transport, and their ability to respect and protect the significance of heritage assets and

### Protect

Respect and protection of heritage assets in Conservation Areas and Local Heritage Areas.



### Evolution

Applies to most residential areas in the borough except Conservation Areas, Local Heritage Areas and those areas on large plots of land with good accessibility. Those areas that are farther from public transport or a Town Centre will see less change than more accessible locations. Under evolution it is expected, in the most accessible locations, that between 1 in every 2,000 homes would be redeveloped in any given year (where existing homes are on smaller plots), rising to 1 in 400 when existing homes are on larger plots.



**Moderate intensification (Developing an area’s local character)**

Applies to areas with inconsistent character (which have their own Place Specific Policy in the Croydon Local Plan 2018); or to suburban areas with large plots of land and within 800m of Croydon Town Centre, other Town Centres, a train station or a tram stop, or with a PTAL of 3 or above. Under moderate intensification in residential areas it is expected that about 1 in every 200 homes, on average, would be redeveloped in any given year.



**Focused intensification (Intensification created by an increased efficiency in use of resources and the expansion of existing and new higher density character types)**

Applies to existing areas of Focussed Intensification in the Croydon Local Plan 2018 (excluding Forestdale) and along the Brighton Road and London Road corridors.



## Transformation

Applies to Central Croydon and the Purley Way.

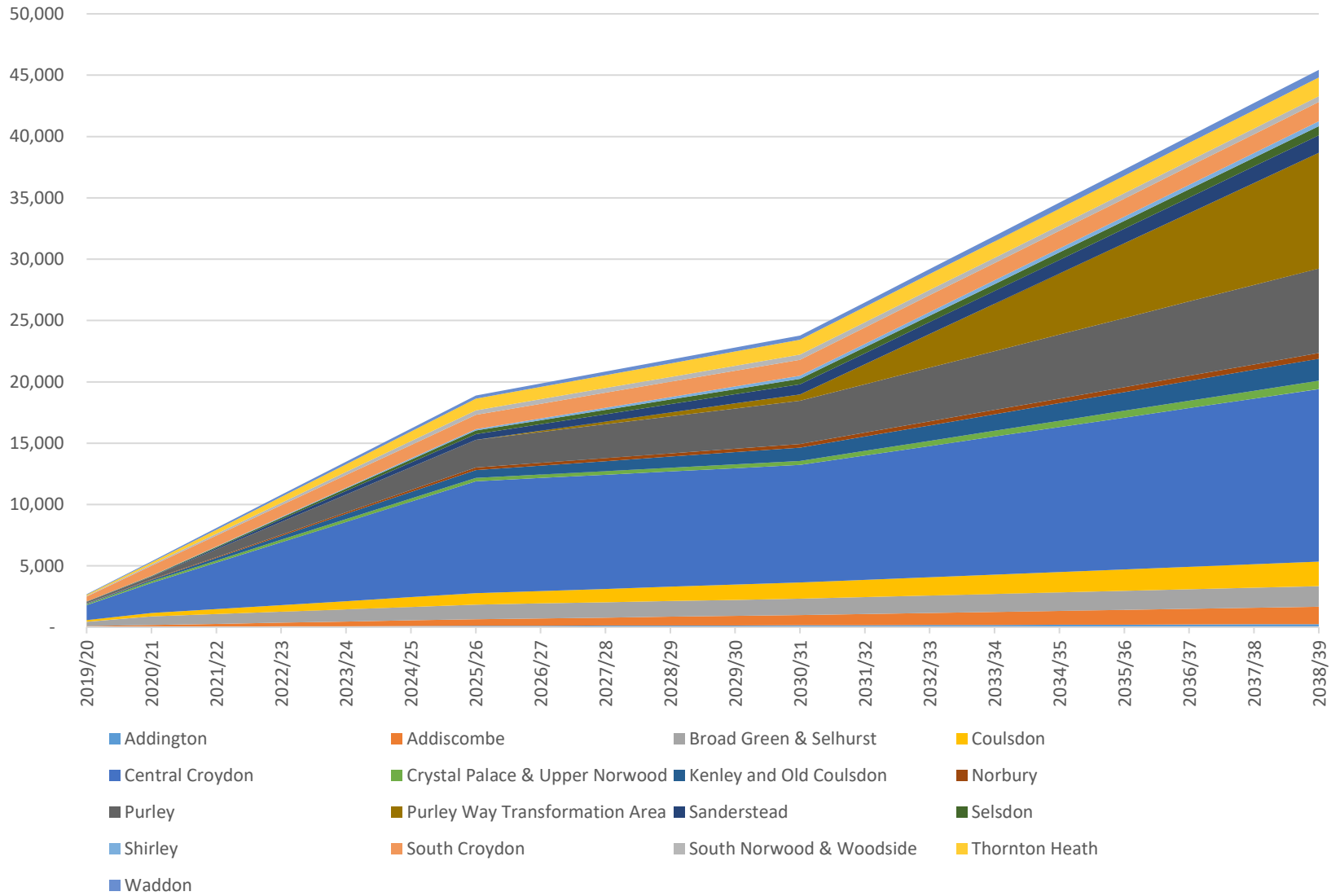


2019



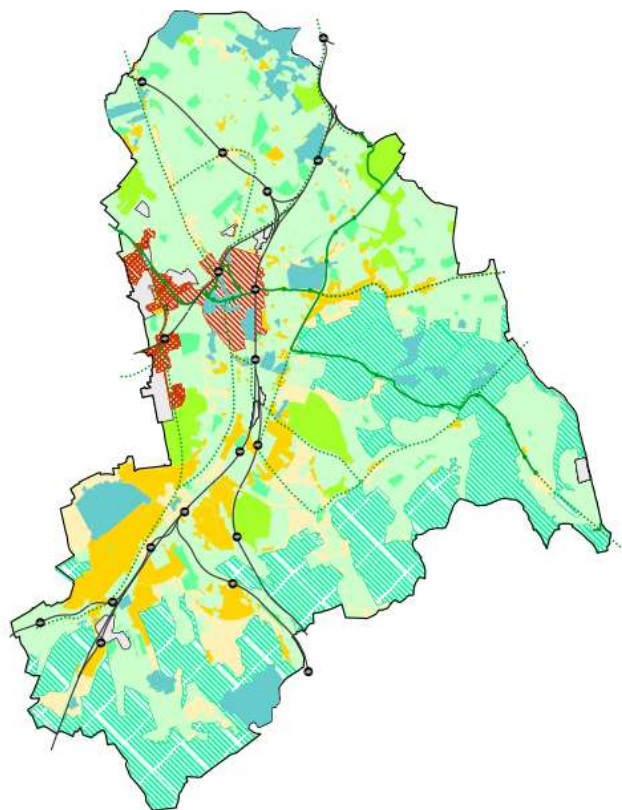
2039 - 9000 homes

### Strategic Option 2 - Higher density development in the Purley Way Regeneration Area



## Strategic Spatial Option 3: An economically and socially sustainable option

### Strategic Options 3.



### Opportunities:

- This option has the potential to reduce the pressure for development on many of the borough's existing suburbs.
- It is potentially easier to provide family homes on Green Belt sites than on intensification sites in suburban areas, or through redevelopment of Central Croydon and Purley Way.
- More affordable housing can be provided on Green Belt sites as their existing financial value is low, there are fewer costs associated with preparing a site for development, but the value of homes is not any lower, so developers can make more 'profit' on Green Belt sites which can be used to provide affordable homes.
- The Green Belt sites suggested already have good access to current utilities, public transport and local services.
- Other areas of Green Belt could be improved and have better public access in compensation for the loss of some Green Belt land with little or no public access.

### Challenges:

- The emerging London Plan does not support the loss of Green Belt for residential development.
- Although the Green Belt sites are the most sustainable sites (in terms of access to services and public transport), they are not the sites which would cause the least harm to the borough's Green Belt if they were released. As such there would be harm to the borough's Green Belt caused by this option when considered against the purposes of Green Belt defined in the National Planning Policy Framework.
- By releasing Green Belt for residential development it may make other parts of the borough, in particular Central Croydon and Purley Way, less attractive places to develop, inadvertently increasing the pressure to redevelop the suburbs.



## Homes by Place (2019-2039)

<b>Place</b>	<b>Total</b>
Addington	190 to 230
<i>Urban extension (Green Belt) of New Addington</i>	<i>2,560 to 3,030</i>
Addiscombe	1,030 to 1,310
Broad Green & Selhurst	890 to 1,070
Coulsdon	1,460 to 1,760
Central Croydon	12,830 to 14,510
Crystal Palace & Upper Norwood	420 to 600
Kenley and Old Coulsdon	1,380 to 1,710
Norbury	360 to 450
Purley	5,400 to 7,060
Purley Way regeneration area	2,900 to 4,470
Sanderstead	1,170 to 1,450
<i>Urban extension (Green Belt) of Sanderstead</i>	<i>680 to 780</i>
Selsdon	580 to 710
<i>Urban extension (Green Belt) of Selsdon</i>	<i>1,300 to 1,540</i>
Shirley	360 to 450
South Croydon	680 to 810
South Norwood & Woodside	350 to 380
Thornton Heath	1,190 to 1,490
Waddon	440 to 550

<b>Place</b>	<b>Total</b>
Already under construction	5,370
<b>Borough totals</b>	<u>At least 46,040 new homes across the borough</u>

## How Places will change between now and 2039

Places will change depending on their local character, their accessibility to services and public transport, and their ability to respect and protect the significance of heritage assets and the ability to deliver commensurate physical and social infrastructure to mitigate growth. Overall there will be less change to the existing urban area with this strategic option compared to Strategic Spatial Option 1.

### Protect

Respect and protection of heritage assets in Conservation Areas and Local Heritage Areas.



### Evolution

Applies to most residential areas in the borough except Conservation Areas, Local Heritage Areas and those areas on large plots of land with good accessibility. Those areas that are farther from public transport or a Town Centre will see less change than more accessible locations. Under evolution it is expected, in the most accessible locations, that between 1 in every 2,000 homes would be redeveloped in any given year (where existing homes are on smaller plots), rising to 1 in 400 when existing homes are on larger plots.



**Moderate intensification (Developing an area’s local character)**

Applies to areas with inconsistent character (which have their own Place Specific Policy in the Croydon Local Plan 2018); or to suburban areas with large plots of land with large plots of land and within 800m of Croydon Town Centre, other Town Centres, a train station or a tram stop, or with a PTAL of 3 or above. Under moderate intensification in residential areas it is expected that about 1 in every 200 homes, on average, would be redeveloped in any given year.



**Focused intensification (Intensification created by an increased efficiency in use of resources and the expansion of existing and new higher density character types)**

Applies to existing areas of Focussed Intensification in the Croydon Local Plan 2018 (excluding Forestdale) and along the Brighton Road and London Road corridors.



### Urban extension in Green Belt

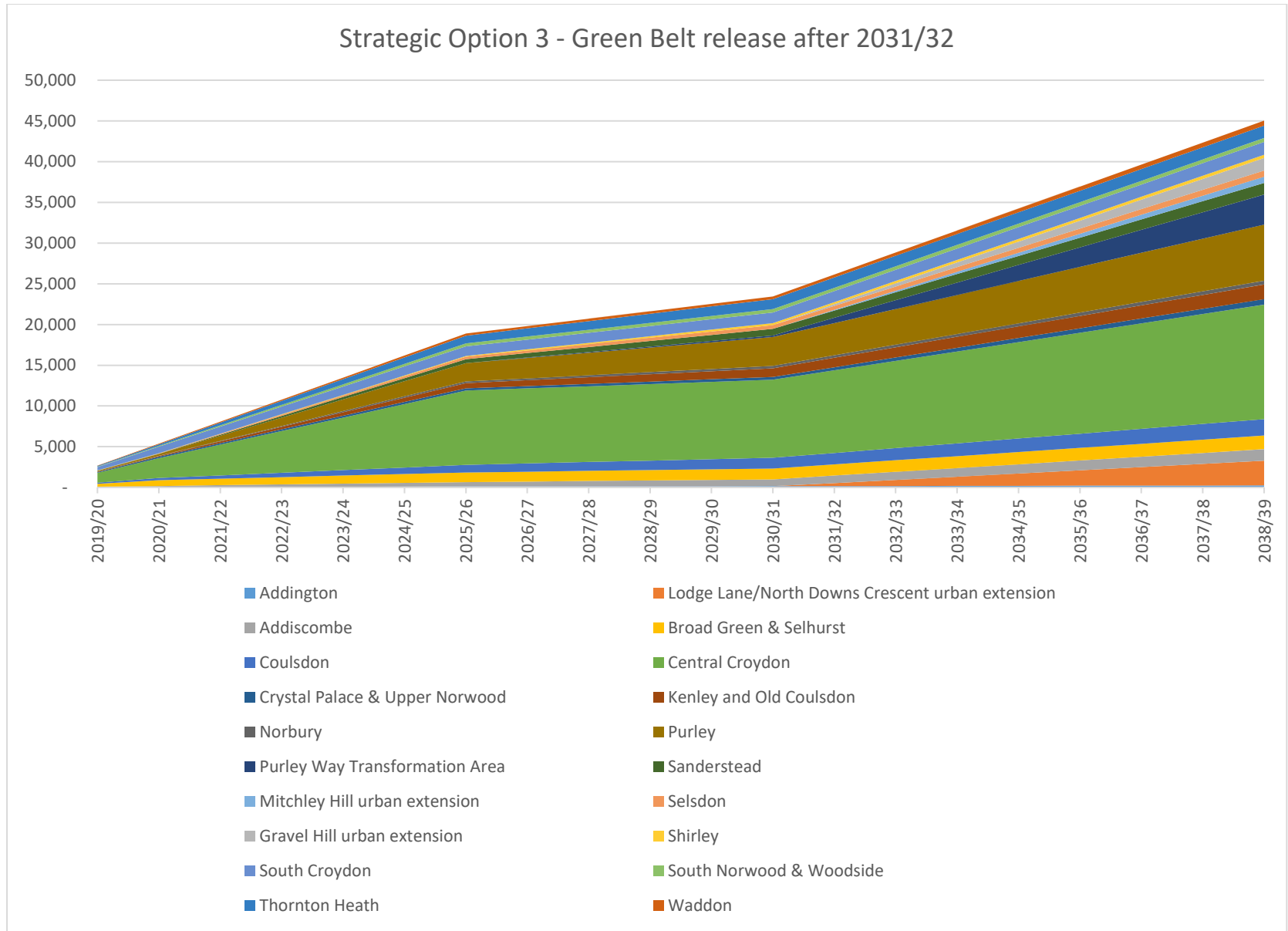
Three urban extensions in Green Belt near Sanderstead, Selsdon and New Addington.



### Transformation

Applies to Central Croydon and the Purley Way.





## Help shape the strategy of the Croydon Local Plan review

### *Option 1*

1. What are the strengths of Option 1?
2. What are the weaknesses of Option 1?

### *Option 2*

3. What are the strengths of Option 2?
4. What are the weaknesses of Option 2?

### *Option 3*

5. What are the strengths of Option 3?
6. What are the weaknesses of Option 3?
7. If Green Belt were to be released for development, should the focus be on finding the locations with the best access to services and infrastructure, or the locations that cause the least harm to Green Belt and those that can be developed most sustainably?

### *All options*

8. What infrastructure needs to be provided to support each option?
9. Which option provides the greatest potential to improve conditions/facilities for existing communities, and why?
10. Which option provides the most environmentally sustainable growth, and why?
11. Which option will help address the causes of climate change most effectively, and why?
12. Which option best helps to address some of the borough's existing environmental challenges, and why?

### *Other options*

13. If you think that none of the strategic options would deliver 46,040 homes in a sustainable manner, what other options are there for meeting Croydon's housing need?

## Topic Areas

This section of the consultation document looks in detail at spatial planning topics providing some key facts, vision, what the main issues are and the policy options that may be used to address these issues. As well as declaring a climate emergency it is recognised that trees and green space that make up the Green Grid are important in Croydon. For this reason these topic areas are explained first in this section. Next the topic of housing as with the rest of the country, Croydon is experiencing a housing crisis. New homes cannot be at the expense of the economy so this is presented alongside housing, retail and the Purley Way Transformation are that combines all there of these topics. As we need to provide for this new development whilst respecting, enhancing and celebrating the borough's unique character and providing for social infrastructure, how may need to do this is presented. As explained already all of the sections follow the same format so they can be read separately but ultimately the bigger picture will be new Local Plan that is produced using your views on these topic areas. The next sections are as follows;

- Addressing the climate emergency
  - Environment and Climate Change;
  - Green Grid;
  - Transport, (Parking and Brighton Mainline upgrade and East Croydon Station)
- Tackling the housing crisis
  - Housing and Affordable Housing;
  - Employment and Retail;
  - Purley Way Transformation Area;
- The borough's character and social infrastructure
  - Housing Design;
  - Urban Design, Heritage and Local Character;
  - Community Facilities – Health and Education; and
  - Community Facilities – Social Infrastructure.

A series of questions are posed at the end of each policy area to prompt responses on the key issues and potential policy changes needed.

Each topic area should be considered having regarding to the three strategic spatial options presented above.

## Environment and Climate Change

### Did you know?

- In 2016, more than half of all CO<sub>2</sub> emissions emitted from within the borough originated from domestic properties
- Croydon is the 4<sup>th</sup> most susceptible town in the UK for surface water flooding
- Croydon Council declared a Climate Change Emergency in July 2019 and established a target for the council to become carbon neutral by 2030

### Where we want to be

Croydon will be the greenest borough in London, where flood risk and emissions are minimised, buildings are constructed to the highest sustainability standards and approaches to mitigate against and adapt to the threat of climate change are treated as a holistic part of the planning process and corporate policy.

### What are the key issues about the environment and climate change to consider?

- Climate change is a global issue with many local impacts, such as flooding, biodiversity losses and extreme temperatures.
- Some parts of Croydon are within the highest tier of land at risk of river flooding, while other areas are vulnerable to surface water flooding. Sustainable Urban Drainage Systems (SUDS) are an effective method of preventing rainwater joining the main sewers and helping to prevent flooding – yet they are considered complicated or

expensive by developers/domestic property owners and are infrequently used in new small or large-scale developments.

- With the need to deliver many thousands of new homes in the borough over the next 20 years, the environmental quality of the homes and impact on the planet needs to be considered.
- New developments can be built with up to date methods but conversions, and the existing building stock especially heritage buildings are difficult to make energy-efficient.
- The London Plan sets a target for the capital to manage the equivalent of 100% of its waste within London, as well as a target for London to be a zero-carbon city by 2050. The emerging London Plan seeks to ensure any and all development is zero-carbon and adheres to an updated energy hierarchy which will inform the design, construction and operation of new buildings.
- In July 2019, Croydon Council also set aims to boost the borough's recycling rate, plant 3,500 street trees by 2023, reduce energy use, create School Streets<sup>11</sup>, create spaces to rest and recover along walking routes and make cycling safer and easier for all.

### How could these issues be addressed through planning policy?

Policy options include:

- Push developers to meet the highest standard of sustainable design and construction for new builds, conversions and refurbishments, such as those set out in

<sup>11</sup> A school street is a street or part of a street outside a school, which during the start and end of the school day is reserved for

pedestrians/cyclists and most vehicular traffic is prohibited. This results in improved road safety around the schools and improved air quality.



the emerging London Plan and Building Regulations (2013) for energy, water and emissions efficiency, and achieving minimum BREEAM standards for sustainability.

- Encourage and enable sustainable refurbishment of our existing housing stock, including insulation and the addition of renewable technologies.
- Apply the thrust of the emerging London Plan climate change strategy.
- New development to enhance even further than in the existing Local Plan improved public realm spaces to embrace exemplar uses of sustainable design, including enhancing biodiversity, incorporating integrated SUDS and sourcing sustainable materials, otherwise the additional homes needed to address the housing crisis will not be able to be delivered.
- Introduce typology specific policies for the provision of green infrastructure in places like busy streets and areas around schools, to tackle air pollution.
- Facilitate reforestation, especially through the extension of existing woodland
- Protect important ribbons of woodland running through gardens and other open spaces that provide wildlife habitats and link other areas that are important in allowing wildlife to migrate
- Creation of designated green routes through the borough.
- Facilitate opportunities for urban farming, growing and enhancing the borough's biodiversity.
- Enhance public realm to promote sustainable and active modes of travel, including civic spaces and pocket parks to rest, water re-filling points and other public facilities.

## Help us to create policy which supports the Environment and mitigates against Climate Change in Croydon

14. Thinking about the environment and climate change in Croydon, what's the most important thing to you?
15. What can we do to support our communities to be greener and more sustainable?
16. Have we missed anything important about the environment and climate change?
17. How can new developments support a reduction in surface water flooding?
18. Are there any other policy options that we should be focussing on? Please explain your answer.

## Green Grid

### Did you know?

- One third of Croydon is green space, made up of mixture of Green Belt, Metropolitan Open Land, recreation/sports grounds and other open spaces
- Thousands of our ancient and important trees are protected by more than 1800 Tree Preservation Orders
- The South London Downs was designated a National Nature Reserve in July 2019, and is only the third of its kind in Greater London
- In July 2019 London was also announced as the world's first National Park City.
- The council has published masterplans for six of our parks, with recommendations for their improvement
- Many of Croydon's parks have the Green Flag Award
- The council will be implementing a new grass verge management routine to encourage wildflower growth, creating a better environment for bees and other insects.

### Where we want to be

Create a series of connected, accessible and inclusive, high quality green spaces across the borough, from north to south, east to west, enabling biodiversity<sup>12</sup>, walking and cycling corridors and networks. High quality public realm and integrated facilities will encourage walking and cycling along these links, with further detailed guidance to be developed to foster the Green Grid networks.

<sup>12</sup> The variety of plant and animal life

<sup>13</sup> Landscape Institute - Public Health and Landscape: Creating Healthy Places (2013)

### What are the key issues for Croydon's Green Grid to consider?

- Our Green Grid consists of a network of parks, green spaces, gardens, woodlands, paths, bridleways and cycleways, rivers and wetlands, as well as urban greening features such as street trees, parklets and green roofs. It will also include gardens and green roofs that help facilitate biodiversity corridors. The Council will work towards producing guidance for private and public developments to help facilitate the Green Grid including enhancing the biodiversity network.
- Green spaces improve health and wellbeing, and access to nature can be peaceful and restorative<sup>13</sup>, increasing diverse social interactions and helping to minimise isolation. In our local neighbourhoods, simply the presence of trees and vegetation has been shown to have a positive impact on resident's wellbeing and perception of an area<sup>14</sup>. Many residents choose to walk or cycle through green spaces, as part of their daily journeys to work or school and as part of a healthy lifestyle. Further, Croydon's Green Grid acts as a 'green lung', helping to mitigate some of the impacts of climate change and improve local air quality.
- Our green spaces are under an ever-increasing pressure from population growth, and previous urban development means that our borough's Green Grid has become fragmented. Furthermore, access to green and open space is not evenly distributed across Croydon, with many

<sup>14</sup> Natural England – Health and Natural Environments: An evidence based information pack (2012)

residents in the north of the borough living over 400m away from their nearest green space. There is limited potential to create large new open spaces, both in terms of available land and money, so we need to protect and enhance our important spaces and maximise their use and value. In addition, biodiversity, urban greening and productive landscapes can be vastly increased through high-quality, landscape-led developments. These can enhance and establish further links between our green spaces for biodiversity, walking and cycling through high quality and inclusive public realm design.

- Smaller interventions like pocket parks and parklets along with walking and cycling networks also reduce car use and encourage active and sustainable modes of travel through provision of resting spaces. This is enhanced further when coupled with facilities such as drinking fountains and accessible toilets.
- Delivering more homes in our already built-up borough means that we have needed to consider the potential for development in limited areas of the Green Belt (in Strategic Option 3), and there could be the potential to increase public open space through such development.

#### How could these issues be addressed through planning policy?

Policy options, in addition to those already included in the Croydon Local Plan 2018, include:

- Continuing to protect and improve access to Metropolitan Green Belt and Metropolitan Open Land.
- Designating the most demonstrably special open spaces in the borough as Local Green Space with the support from, and a leading role from, the local communities they serve.

- Protect other Green Spaces in the borough from development and seek to increase access to and quality of these spaces.
- Support urban farming, productive landscapes and growing to diversify the green networks and biodiversity; this can include bee-keeping.
- Including the intended borough's Green Grid in planning policy and on the Local Plan policies map.
- Requiring all new developments to; provide a net-gain in biodiversity, and; maximise opportunities for green corridors, green infrastructure, urban greening, urban farming, and high quality public realm and landscape design.
- Require new developments to increase access to open space for residents and improve the quality of existing open space.
- Publish guidance on Croydon's Green Grid including how it can act as corridors for wildlife, and to encourage more sustainable journeys on foot or by bike through high quality public realm design and interventions.
- Protecting and planting new trees.
- Empowering local communities to take ownership of their parks, open spaces, streets to create pocket parks, parklets, urban farms and community gardens.
- Establishing a clear policy link between the air quality benefits of the Green Grid and actions to mitigate and adapt to climate change.
- Integrate smart and digital infrastructure to facilitate and enhance the green grid objectives.

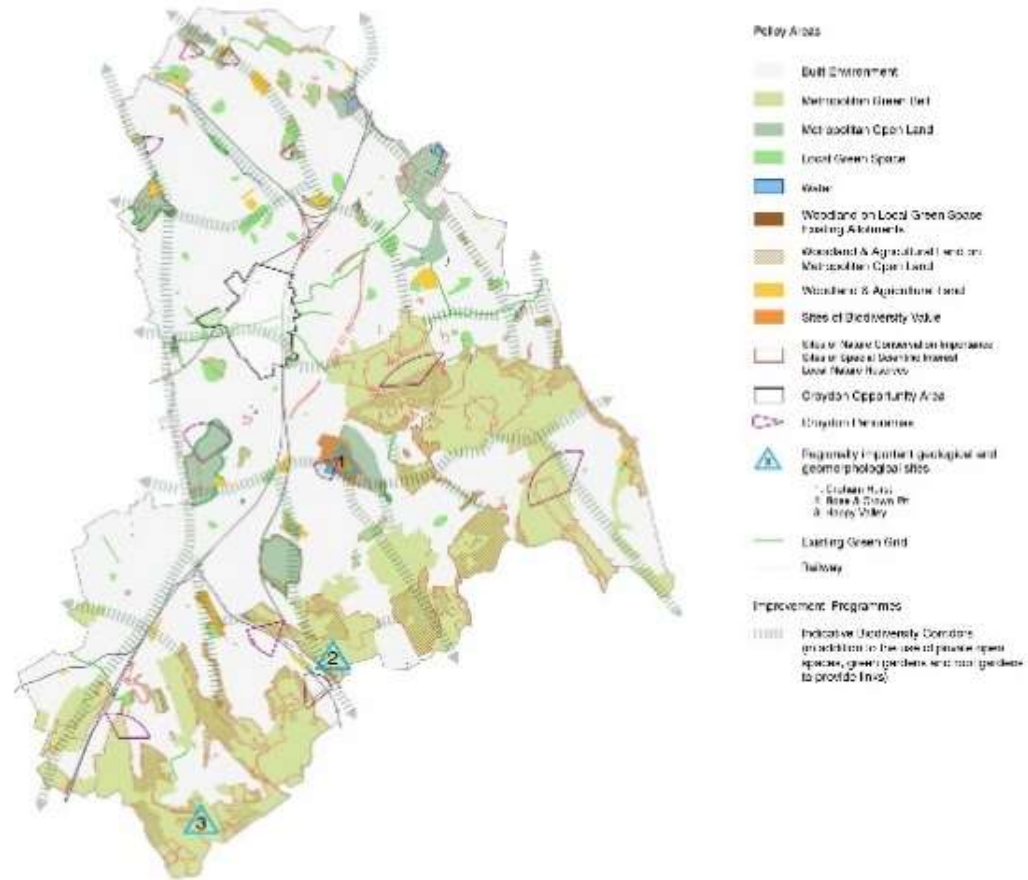
#### Local Green Space and other green spaces

Details about Local Green Space, including what the designation is, and which spaces are considered to be

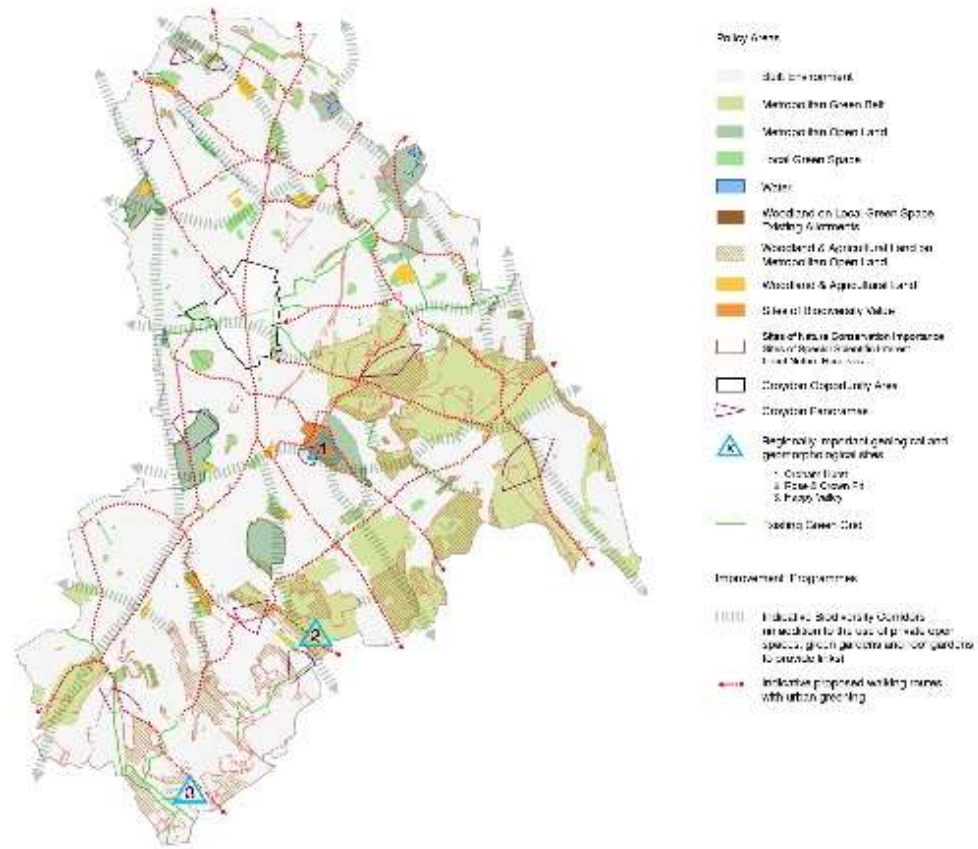
possible Local Green Spaces can be found in the Places of Croydon section of this consultation document.

### Help us to create policy which Croydon's Green Grid

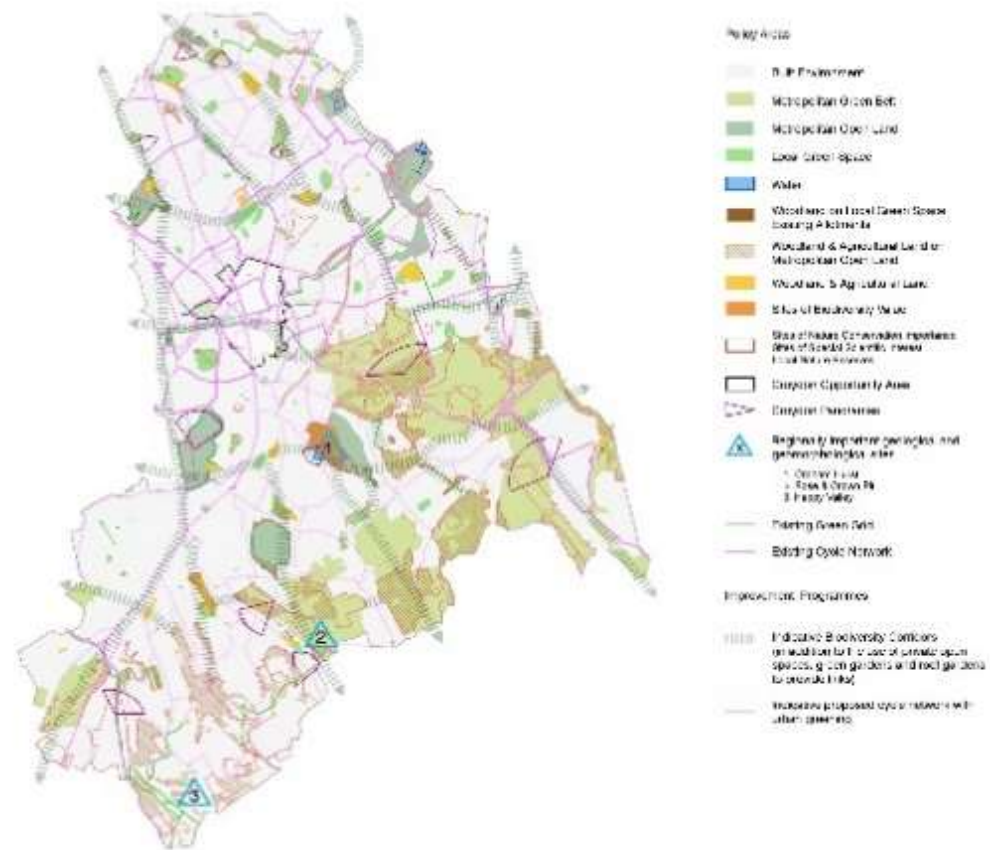
19. How can we make it easier for people to walk and cycle more?
20. How can we make our town centres greener?
21. What could be improved in your local park and any other green spaces to increase biodiversity?
22. How can the Green Grid be made accessible to all parts of Croydon's diverse communities, of all ages and abilities?
23. What facilities would need to be provided along the Green Grid to encourage as many people as possible to use them?
24. Are there any other policy options that we should be focussing on? Please explain your answer.



# Green Grid – Walking



# Green Grid Cycling



## Transport

### Did you know?

- The tram network system within Croydon spans 17.26km and is a vital way to move large numbers of passengers into Central Croydon
- 51% of all transport journeys in the Borough are made by walking/cycling and/or public transport – known as Active Travel
- Projects are working to transform the road network in Central Croydon to improve connectivity and public realm

### Where we want to be

Croydon will be a vibrant borough with sustainable connections to places and communities, locally and regionally. Croydon communities will walk, cycle and use public transport at an increasing rate so that traffic congestion is much reduced and local air quality improved. We will be well on our way to helping resolve our planet's climate emergency.

### What are the key issues about Transport to consider?

- As Croydon grows, we need to cut the amount of private car use, traffic and congestion and resultant pollution in our streets.
- We need to help people be more active (to walk and to cycle more) as part of their daily travel routine. We need to make more of our streets 'Healthy Streets', as defined by Transport for London, and facilitate high quality public realm and landscape design where people can enjoy walking, cycling or just spending time. The good news is that Croydon is the London borough with the greatest potential for walking and cycling. This is because so many

of us are using the car to travel distances that could be cycled or walked.

- Growth is happening all over Croydon, including in suburbs without much public transport. This means that increasing walking, cycling and public transport use borough-wide can be challenging. However, growth brings transport benefits as well as challenges. The many thousands of homes being built in Croydon Town Centre mean even more thousands of people living within walking distance of jobs, schools, libraries, shops and other services they need.

### How can this transport vision be addressed through sustainable planning policy?

Policy options include:

- New pedestrian and cycle routes, including the expectation that new major developments connect to the pedestrian/cycle network and public transport stops and stations.
- Continue to improve and enhance the design of streets and walking/cycle networks. Street design should integrate facilities such as public toilets, pocket parks, generous and safe crossings to prioritise people over cars, and as a result encourage the uptake of walking, cycling and public transport.
- Enhancing the bus and tram network to link new and growing places, such as Coulsdon, Norbury Purley, Purley Way, Sanderstead, Selsdon, , beyond the current terminus at New Addington and other routes heading out of the borough towards both Bromley and Sutton.

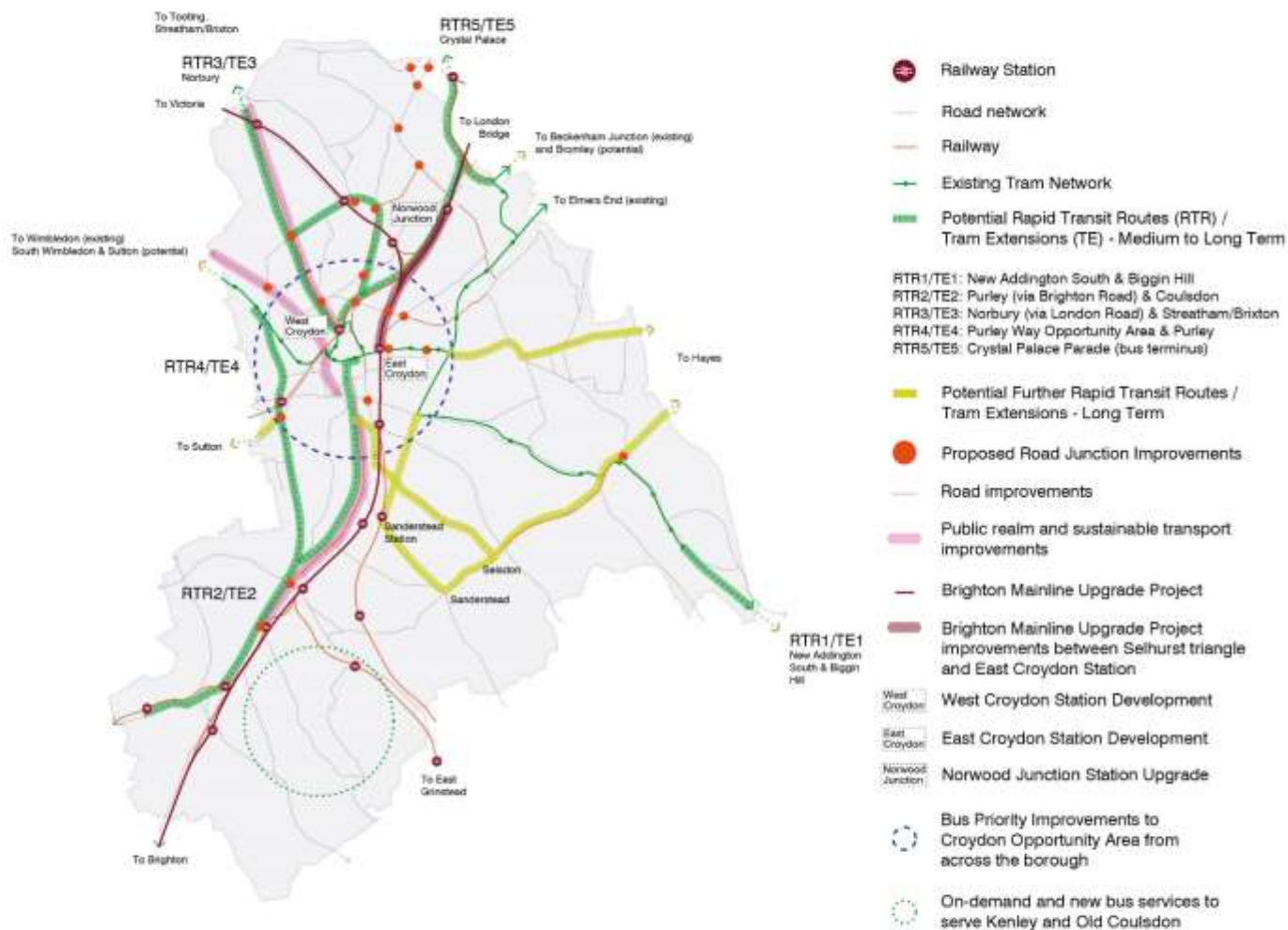


- Safeguarding land needed for major rail and tram upgrades, extensions and supporting facilities.
- Scope and test the feasibility of new types of public transport that can serve the growing suburbs, such as on-demand bus services.
- Enabling and supporting integration of new smart technologies and digital infrastructure to improve navigation and facilitate electric vehicles.
- Intensify development in parts of the borough to provide the critical mass of new residents and businesses for there to be a business case for new transport infrastructure.

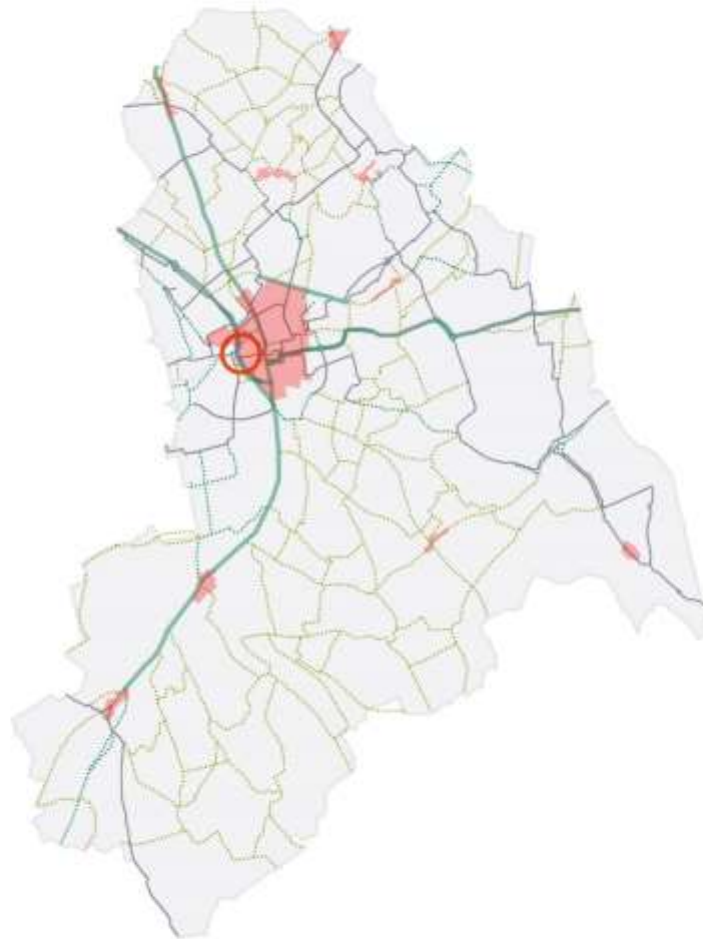
### Help us to create policy which supports sustainable transport in Croydon

25. What issues do you experience relating to transport in Croydon?
26. What would encourage you to use your car less and either walk, cycle or take public transport?
27. Which walking or cycling routes would you like to see improved?
28. Do you think tram extensions within Croydon are a good idea? If so, where and why?
29. To provide the homes and infrastructure for our future Croydon we have to build in every place in the borough, what can be done to minimise congestion on the borough's roads?
30. Are there any other policy options that we should be focussing on? Please explain your answer.

## Public Transport Vision and Opportunities



Cycling Routes  
Vision and Opportunities



- Existing cycle routes, including LCN routes:  
- C, WT, Q5, 5, 17, 20, 21, 22, 23, 27, 29, 62, 73, 75, 76, 77, 78, 212, 222, 232, 755, 777
- Proposed principal cycle routes
- Proposed secondary cycle routes
- Other routes suggested for cycling
- District Centre
- Old Town Liveable Neighbourhood funded projects, including:
  - reallocation of road space to pedestrians and cyclists;
  - reduction in traffic dominance;
  - reduction of road danger;
  - reduction in vehicle speeds;
  - improvement in personal security;
  - improvement in air quality and the resilience of the public realm through the introduction of new green infrastructure and sustainable urban drainage; and
  - creation of innovative lighting and public art to humanise the concrete ring road

## Parking

### Did you know?

- Croydon's car ownership per household is around 10% higher than the London average<sup>15</sup> although a third of households do not have access to a car
- The journey to work is dominated by the car for those that live and work in the Borough (2011 Census)
- Currently there are only 37 car club vehicles available on and off street across the borough
- Only 19% of Croydon's roads are covered by controlled parking zones which restrict local parking to residents or discourage people taking cars to busy locations such as around train stations

### Where we want to be

A well connected borough with a choice of sustainable transport options that embrace non-car travel. This will support well-being, improving air quality and tackling climate change. This is all achieved through sustainable transport improvements and options where growth is planned, more car borrowing schemes and a more efficient use of land by restricting car parking provision.

### What are the key issues about parking to consider?

- The climate change emergency means that the planning system must now look to a future where, alongside improved public transport and healthier lifestyles, there is much reduced need to provide parking for cars.

- There needs to be a “major shift” in how people view car ownership and use of the private car for short journeys, especially in the light of the new housing target, the need to tackle climate change, carbon reduction and improve air quality (as set out in the council's Air Quality Action Plan 2017-22).
- The north of the borough is well connected and people have access to good levels of public transport, but in the south of the borough there are areas with relatively limited public transport coverage and challenging topography, means currently there is a greater reliance on cars. This is exacerbated further by the fact that commercial car club operators, are currently not operating from sites in suburban locations.
- The choice of leaving the car behind or not owing one at all, to do every day journeys by an alternative means such as walking or cycling, needs to be a lifestyle choice. This will enable people to live healthier lives with health benefits.
- Car parking is also about where people park their cars when they go to work, go shopping or undertake leisure activities. Land for cars, often in busy locations, needs to be available multiple times if they are used for these journeys.
- In addition to a climate change emergency there is a housing crisis with more homes needing to be built, so

<sup>15</sup> London Travel Demand Survey (LTDS 2011/12: London 54%, Croydon 64%)

using land for excessive car parking results in an inefficient use of land at the cost of high quality reasonably priced housing, private amenity space and green space.

- A balance is required between meeting the on-going needs for some private cars and the need to reduce reliance on them in order to ensure 'good growth'<sup>16</sup>.
- If we do not address car parking for new developments both on site and off site for all land uses, this may lead to parking overspill and more clogged streets; affecting pedestrian movement, traffic flows, highway safety, cycle movements, bus journey times and amenity of the surrounding area.
- On-site parking provision should be designed as an intrinsic part of a development proposal, meeting high design and landscaping standards and making provision for disabled persons parking.
- The Mayor of London sets new maximum parking standards in the London Plan, meaning in areas with good or average public transport accessibility such as within 800 metres around Town Centres and public transport stations, on-site parking is capped. This means parking provision within developments has to be minimised even if there is existing parking stress on street. The most effective way of managing the impacts on parking from new developments is through parking controls and restricting access to on-street parking permits.

### How could these issues be addressed through planning policy?

Policy options include:

- Policies to meet all (including non-residential) evolving parking needs, including the delivery of cycle parking, cycle lanes, car clubs, electrical vehicle charging points, highway safety, business deliveries and managing parking stress (e.g. car free or permit free developments); alongside non land use planning mechanisms to manage car parking provision, such as controlled parking zones in residential areas and in town centres.
- Policies to support improvement of walking and cycling infrastructure that will promote healthier lifestyles and support well-being. A well established Green Grid will also support this policy approach.
- Consider applying lower maximum parking standards than those set out in the London Plan, using Public Transport Accessibility Levels (PTALS) to inform provision.
- Seek ways for developers to support the development of car clubs in the suburbs.
- Consider applying minimum parking standards in locations with very limited accessibility to public transport to prevent severe overspill parking onto local streets.
- Designate specific local plan housing allocations as 'car free' or 'permit free'.

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<sup>16</sup> Includes reducing car dominance, providing inclusive access to public transport, creating well connected communities and seeking to improve

health and reduce health inequalities (Mayor of London, Good Growth by Design 2017).

## Help us to create a sustainable parking policy for Croydon

31. Thinking about parking, what's the most important thing to you?
32. Do you have any thoughts on new development proposals being car free or permit free?
33. What is preventing people from using alternatives to the private car?
34. What are your ideas for how Croydon could make more use of car clubs, particularly in the suburbs?
35. Are there any other measures which could be rolled out?
36. Would you make any changes to the council's current car parking policies, to make them more effective?
37. Do you have any ideas how the Local Plan review can address the parking needs of new development proposals?
38. Should Croydon produce parking standards that are different to those set out in the London Plan? Please explain why?
39. Should the council set a minimum level of parking in areas with very limited accessibility to public transport, and why?
40. Are there any other policy options that we should be focussing on? Please explain your answer.

## Brighton Mainline Upgrade and East Croydon Station

### Did you know?

- Croydon Area Remodelling Scheme (CARS) is the largest and most complex part of Network Rail's longer-term Brighton Main Line upgrade project.
- CARS would remove the most operationally challenging bottleneck on Britain's railway network, located in the 'Selhurst triangle', the junctions north of East Croydon, and through East Croydon station.
- Adjacent to East Croydon Station 554 homes and 27,015m<sup>2</sup> of office space has been constructed over recent years
- Adjacent to East Croydon Station 2,126 homes and 92,863m<sup>2</sup> of office space has planning consent
- East Croydon is a critical sustainable transport hub, providing access to the train, tram, bus, walking and cycling networks.

### What are the key issues about the Brighton Mainline Upgrade and East Croydon Station to consider?

- The project is undertaken without significant disruption to existing residents, businesses and development proposals.
- The CARS project cannot take place unless land currently outside of Network Rail's ownership is tied in with the project.
- Some proposals may have to be timed and designed to ensure the bigger picture of the proposed upgrade to the Brighton Main Line is able to be delivered.
- The CARS project will result in the loss of and impact business space in some Industrial Estate locations, including Tait Road Industrial Estate.
- The CARS project requires additional land outside of Network Rail's ownership, temporarily to support construction.
- Ensuring the project and adjacent station development is a catalyst to inward investment in the East Croydon Station area, to improve the economy of area and borough.
- Cement the borough's position as an outer London strategic economic location to the benefit of Croydon, London and wider South East.

### Where we want to be

Timely and effective operational rail improvements (CARS Project), through the delivery of a high quality new East Croydon station, a successful sustainable transport interchange and 'adjacent station' development that makes a transformational contribution to the borough's growth. This will result in East Croydon Station area being a destination and transport hub of regional connectivity.

## How could these issues be addressed through the Local Plan review, East Croydon Masterplan, TWA Order and a Strategic Regeneration Framework?

Policy options include:

- Ensuring that the development in the Local Plan is timed and delivered alongside the need to deliver the CARS project so that it is delivered.
- The Local Plan, East Croydon Masterplan, TWA Order and a proposed Strategic Regeneration Framework are persuasive to the Department of Transport to approve the outline and final business case for the CARS project.
- The Local Plan review, TWA Order and proposed Strategic Regeneration Framework are used as a clear planning framework setting the requirements and design parameters for a successful East Croydon Station, sustainable transport interchange, improved public realm and appropriate 'adjacent to station' development.
- Ensuring that the CARS project supports the operational feasibility of metroisation of the suburban rail network.
- The vision, CARS project and the above will only be delivered by meaningful and successful collaborative working through the CARS governance, including all key stakeholders.
- The Local Plan review provides the policy and allocation framework for the successful protection of the land required for the CARS project, including scheme construction.
- The Local Plan review provides the policy and allocation framework to enable the appropriate re-provision of impacted Industrial Estate locations, including Tait Road Industrial Estate.

## Help us to make the CARS project a success

41. What do you consider to be a successful train station and transport interchange and how could these successes be applied to a redeveloped East Croydon Station?
42. On the basis East Croydon Station is to be a major destination, what facilities and services would you hope to see?
43. Beyond housing and offices, what other forms of development do you think would contribute to the area surrounding East Croydon station?
44. What improvements would you like to see to the spaces around East Croydon station?
45. What is missing from the vision that you consider essential to the successful delivery of the CARS project?



## Homes

### Did you know?

- Croydon's population is gradually getting older and household sizes are getting smaller
- Although higher housing growth will make Croydon slightly less unaffordable and encourage younger adults to move to the borough due to the supply of housing
- Currently 69% of owner occupied homes in Croydon have 3 or more bedrooms, but 78% of 3-bedroom owner occupied homes and 90% of 4-bedroom owner occupied homes are statistically under-occupied
- Together this means that Croydon will not need so many new 3-bedroom homes in the future, just 35 to 45% of new market homes will need to have 3 or more bedrooms
- In contrast due to the ability to manage tenancies, under-occupation of affordable housing and private rented homes is much less of a problem
- There is currently a shortfall of owner-occupied supported living (or sheltered) accommodation for the elderly in Croydon, but a surplus of rented supported living homes
- In the London Borough of Croydon, there are currently 60 individuals and 1 association on the custom and self-build register

### Where we want to be

An integrated place and community focussed approach to high quality housing delivery, sustainably meeting housing needs with targets. Regeneration, placemaking objectives, 'active travel'<sup>17</sup> provision, quality public realm and commensurate physical and social infrastructure at the heart of delivery. Developments to also respect and enhance the heritage and character of the place.

### What are the key issues about housing to consider?

- The need for and delivery of high quality market, private rented, affordable rented and intermediate housing, creating integrated communities across the borough with adequate physical and social infrastructure.
- The need to ensure that dwelling size, tenure, provision of affordable housing, specialist housing (including supported living for the elderly and community-led housing) meets the known requirements for Croydon.
- To balance housing provision with other uses including business, retail, community facilities<sup>18</sup> and the natural environment to ensure Croydon is a sustainable place.
- Maintaining high design quality standards, including in areas of focussed housing delivery (Central Croydon and Purley Way) and in areas of suburban intensification.

<sup>17</sup> Includes walking, cycling and public transport use.

<sup>18</sup> As included in the topic areas Community Facilities - Health and Education and Community Facilities - Social Infrastructure.

- Designing new housing around cycling, walking and sustainable public transport, in accordance with ‘Healthy Streets’<sup>19</sup> and ‘Good Growth’<sup>20</sup> initiatives.
- Providing a steady housing supply of ‘allocated’ housing sites. The recently completed ‘call for sites’ exercise ensures we are aware of potential sites, which could be ‘allocated’ in the Local Plan.
- The contribution of specialist housing models including but not limited to self-build, custom-build and community led housing projects, intergenerational housing and student accommodation; to housing delivery at the local level.
- High rise developments are providing a large number of homes and we could continue to do this in sustainable locations with good transport links and facilities.
- The need to free up those under occupied 3-bedroom homes and add to the supply as well, to provide family housing reflecting Croydon’s attractive outer London location.
- Setting out the mix of homes to be achieved on sites around the borough, including setting out where studio homes and larger units are best provided.
- Encouraging mixed tenure, mixed size development to enable the provision of balanced new neighbourhoods.
- Supporting high quality build to rent homes in Croydon.
- Promoting self-build, custom-build, community-led housing schemes, co-living, intergenerational housing and other positive specialist models.
- Supporting developments that include supported living accommodation for the elderly and those with physical or learning disabilities.
- Promoting and guiding high quality design of new homes including amenity, public realm, and enhancing local character and vitality of a place.
- Ensuring new developments are attractive for households wishing to downsize in the borough.
- Promoting and guiding the development of accessible, lifetime homes and wheelchair accessible homes.
- Setting out requirements to design in high quality affordable homes.

#### How could these housing issues be addressed through planning policy?

Policy options include:

- Finding enough housing sites and a strategy to meet the housing needs of the borough.

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<sup>19</sup> Includes improving health and reducing health inequalities, with less car use and more walking, cycling, use of public transport and better freight management (Mayor of London’s Transport Strategy 2018).

<sup>20</sup> Includes reducing car dominance, providing inclusive access to public transport, creating well connected communities and uses the “Healthy Streets” approach (Mayor of London, Good Growth by Design 2017).

Help us to create policy which supports a managed and sustainable approach to housing provision in Croydon

46. Thinking about housing, what's the most important thing to you and why?
47. Croydon has to increase the amount of housing it currently provides. Do you have any ideas how we can achieve this?
48. If you live in a property that is bigger than you need, what would make moving to a new development with smaller properties attractive to you?
49. What is preventing more self-build homes (where you design your home) being built in Croydon?
50. What is preventing more custom-build homes (where a developer provides a shell but the purchaser specifies the layout and fit out of the home) being built in Croydon?
51. What is preventing more community-led housing (where groups of residents build their own affordable homes) being built in Croydon?
52. How can the Local Plan support the delivery of high-density family homes across the borough, and meet the need for this type of housing?
53. How can the Local Plan review support purpose built private rental schemes in Croydon?
54. Are there any other types of home that the Local Plan review should be supporting that will help to meet housing need in Croydon?
55. Are there any other policy options that we should be focussing on? Please explain your answer.

## Affordable housing

### Did you know?

- There are 5,500 households on the council's housing register, far more than the number of affordable homes becoming available to let
- Average house prices in Croydon are over 11 times average incomes
- Over 3,500 people approach the council each year for assistance with homelessness and there are 650 homeless households currently in bed and breakfast accommodation
- 17% of the borough's homes are affordable homes
- Affordable housing is usually owned and managed by the council or housing associations (known as Registered Providers of Social Housing)
- Affordable housing can include affordable homes for rent and homes for low cost ownership (e.g. shared ownership)
- From 2016 to 2018, 11% of housing completions were affordable homes
- A large proportion of new homes come from developments on which the council cannot ask for affordable housing, including sites under 10 homes and developments that the government has made 'permitted development' such as most conversions of offices to homes
- On sites where the council can ask for affordable housing 22% of new homes were affordable

### Where we want to be

A choice of homes that will contribute to addressing the borough's need for affordable homes. These homes will need to be robust and high quality, genuinely affordable, offer a

range of tenures, sizes and locations to address local needs and be designed into developments at an early stage, with key amenities and a consideration of best practice and urban design principles

### What are the key issues about affordable housing to consider?

- The recently commissioned Strategic Housing Market Assessment for the borough estimates a need for 2,254 affordable rented homes a year in Croydon over the next 20 years.
- This means that the overwhelming need for new homes is for more affordable homes, particularly affordable homes for rent.
- Ways to viably maximise the level of affordable housing on new developments, whilst ensuring that developers are not deterred from bringing forward new sites for housing.
- Minor developments (under 10 homes) do not currently make any contribution towards affordable housing, which creates a 'cliff edge' which discourages developers from building schemes of 10 to 15 homes because of the requirement for affordable housing.
- Affordable housing policies need to be grounded in a good understanding of local housing needs to ensure that the right mix of housing is delivered providing a range of tenure types and property sizes for different households.
- Specific Croydon policy on what is affordable for different households is needed to reflect the Mayor of London's drive towards genuinely affordable tenures and rents for residents across London.

## How could these issues be addressed through planning policy?

Policy options include:

- Setting minimum requirements for affordable housing based on testing of common development typologies at plan-making stage.
- Reducing or removing viability assessments for developments that meet the minimum affordable housing requirements.
- Adopting London Affordable Rent levels in place of affordable rents at up to 80% of market rents<sup>21</sup>.
- Seeking the maximum affordable rented accommodation possible on developments whilst also delivering other types of affordable homes (such as shared ownership and London Living Rent).
- Introduction of viability credits.
- Review how to encourage developments of 10-15 homes without the 'cliff edge' impact of exceeding 9 that currently exists.
- Introducing a simple and transparent system of financial contributions towards affordable housing for developments of under 10 homes, which are currently exempt from providing any affordable housing, to fund additional affordable housing in the borough.
- Reviewing existing policies on the affordable housing tenures, types and mix needed whilst ensuring developments create mixed and sustainable communities.
- Introducing more robust policies to ensure that sufficient wheelchair accessible homes for people in need of affordable housing are developed.
- Tightening up the existing policy on Vacant Building Credit so that only genuinely vacant buildings benefit from it.
- Updating existing Local Plan policies to cover additional design and place making principles such as tenure blindness.
- Adopting the emerging London Plan threshold approach which aims to incentivise developers to deliver minimum levels of affordable housing by offering a fast track route through planning.

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<sup>21</sup> London Affordable Rents are based on benchmark rent levels set by the GLA which reflect what the majority of Londoners can afford.

## Help us to create policy which supports the delivery of affordable housing in Croydon

56. Tell us any ideas you have for increasing the number of high quality affordable homes in the borough.
57. What types of affordable housing are most needed?
58. How can the council make sure there are enough affordable homes for people with disabilities or long-term health conditions?
59. Should the council set minimum affordable housing percentages that apply to every housing site, and why?
60. Do you think developers of smaller sites (under 10 homes) should make a financial contribution towards affordable housing, and why?
61. Should all affordable rented homes be provided at London Affordable Rents (which are lower level of rents), even if this reduces the number of affordable homes delivered?
62. Are there any other policy options that we should be focussing on? Please explain your answer.

*The following questions are aimed at the planning and development sector. However, any interested person is welcome to answer them:*

63. Should viability assessments be undertaken at the plan-making stage to inform affordable housing requirements, rather than at application stage, in line with national planning policy and why?
64. Is the current requirement for an affordable housing mix of 60% affordable/social rent and 40% shared ownership/intermediate housing appropriate or should it be changed in line with the new London Plan?
65. Would adoption of the London Plan threshold approach to viability help deliver more affordable homes?

## Employment

### Did you know?

- Croydon is the largest town centre in London and one of only two strategic office centres outside central London
- Many Croydon residents commute to jobs in Westminster, the City and Canary Wharf
- A higher proportion of Croydon's population is economically active compared to that in London or England
- Croydon central has been identified as a Creative Enterprise Zone<sup>22</sup>
- The location of Fairfield Halls, Croydon College and the Brit School in the borough, alongside a large diverse youth population, means that there are already facilities and talent for the creative and cultural employment sector
- Across the borough there are a wide range of businesses, many unique and reflective of the diversity, culture and enterprising nature of Croydon residents

### Where we want to be

Croydon should be the premier business and office location in South London supporting existing businesses and encouraging diverse and innovative exciting new local businesses and job opportunities for the borough's population.

### What are the key issues about the economy to consider?

- There are considerable pressures on industrial and office premises for them to be used for residential development.

In light of the new housing target, this will only continue as our need to build housing increases.

- Demand for industrial spaces is currently outstripping supply which is resulting in rent increases for local businesses.
- Small and medium businesses employ local people but they find it hard to find suitable premises to grow into locally.
- Supporting the growth and success of the Creative Enterprise Zone.
- It is important to support the economy to contribute to social wellbeing and provide employment opportunities to the borough's population.

### How could these issues be addressed through planning policy?

Policy options include:

- Protecting, upgrading and encouraging intensification of the borough's existing employment areas, especially the most valuable and protected employment areas.
- Exploring opportunities for intensification of employment space according to local demand, supported by interesting urban design and landscaping, promoting innovative communication and making urban areas more accessible through encouraging short cuts and better ways to get around, which will ensure the employment areas are pleasant places to work.

<sup>22</sup> Creative Enterprise Zones are a Mayor of London initiative to designate areas of London where artists and creative businesses can find permanent

affordable space to work; are supported to start-up and grow; and where local people are helped to learn creative sector skills and find new jobs.

- Encouraging new and innovative workplaces in urban locations where employees can live nearby.
- Encouraging creative and cultural businesses through the provision of affordable flexible spaces, studio spaces, display spaces.
- Provide affordable workspace, production spaces, studios and maker spaces, creative workspaces/workshops.
- Improve skills through the location of education facilities associated with existing local youth talent.

### Help us to create policy which supports the economy in Croydon

66. What can be done to encourage residents to work in Croydon rather than commute out of the borough?
67. How can we encourage and support youth talent?
68. Do you have any ideas for how more businesses can operate in our existing industrial estates?
69. How can the council encourage more creative industries to come to Croydon?
70. How can we create and encourage affordable workspaces in the borough?
71. How do we support our independent businesses to survive as competition for land increases?
72. How might new homes be developed alongside industrial uses and still be spaces that work for both residents and businesses?
73. Are there any other policy options that we should be focussing on? Please explain your answer.



## Retail

### Did you know?

- Croydon Town Centre is the largest town centre in London
- There are 9 other Town Centres, 9 Local Centres and 18 Neighbourhood Centres in the borough – see map
- Numerous Shopping Parades in the borough provide for local shopping and service needs
- The Whitgift Shopping Centre is due to be redeveloped
- During the 1980s and 90s, increased emphasis on out of town shopping areas resulted in a new retail area growing along the A23 (Purley Way)
- In 2011, Croydon Town Centre had more shops in one location than anywhere else in London apart from the West End itself, however, has faced stiff competition from other centres and the increasingly online and experience focused nature of retail
- There is a variety of retail offer from destination retail, out of town and big box retail, to local and neighbourhood centres and parades; all facing different challenges and opportunities

### Where we want to be

Central Croydon will be the premier retail and town centre location in South London and sub region, enabling innovative and adaptive retail processes and experiences, supporting existing businesses and encouraging new retail and town centre offers. The retail offer will be future-proofed, and be one step ahead to adapt and service a rapidly changing industry and customer demands.

### What are the key issues about retail to consider?

- Croydon faces competition from other areas of London and the South East for inward investment in new and improved retail space.
- There are concerns surrounding the increase of vacant retail premises across the borough, the long term future of retailing as a sector and rapid changes in the industry on a global scale.
- Shops are increasingly being converted to housing. This is an issue, particularly where it occurs on ground floors
- The increasing need for housing will place pressure on current retail areas, particularly on local and neighbourhood centres and provide opportunities for new retail in mixed use developments.
- Some of the borough's shopping areas are not easy to use or get to as they are not pedestrian or cycle friendly.

### How could these issues be addressed through planning policy?

Policy options include:

- Protecting and improving existing successful retail areas.
- Encourage diversity in the offer of centres to meet modern and future needs; researching the changing nature of retail and its various typologies (both retail and industry) to inform emerging masterplans, and provide insight and guidance for future development plans
- Encourage the use of sustainable modes of transport; cycling, walking and public transport to increase customer footfall through retail hubs.
- Encouraging more living above shops to make centres safer and more vibrant, as well as create a diverse place

- Improve and create an active, engaging and high quality public realm along the high streets to attract new businesses and increase customer footfall. Diversification of high street offer is also needed in a changing retail landscape.
- Research, test and integrate the broader industry lifecycle from production, display, exhibition and sales; both in retail centres and digital space
- Support development of local and regional business networks along high streets.
- Improve employment and skills training and opportunities for local residents including business support for start ups; precursors and testing of new retail models and typologies.
- Protect and enhance commercial/retail spaces in high streets, Local and Town Centres that provide essential services as there will be an increasing number of homes and residents.
- Consider integrating wider 'retail' and commercial offerings in smaller struggling centres that include services, coffee shops, workshops, and small studios.
- Integrate affordable units for creative and cultural uses and social infrastructure within town centres.

### Help us to create policy which supports retailing in Croydon

74. What is working well along your high street?
75. Do you have any ideas as to how we can create more affordable space for independent retailers?
76. What type of businesses would you like to see in your local town centre?
77. Are there any other policy options that we should be focussing on? Please explain your answer.

## Purley Way

### Did you know?

- Purley Way is the borough's primary employment location and includes two Strategic Industrial Locations<sup>23</sup>
- The area also includes the borough's primary out of town retail location including Ikea and other large retailers
- Improvements to the Fiveways Junction are scheduled to be completed by 2023/24 which will relieve congestion and also improve walking and cycling connections in the area
- This is a significant area of largely occupied commercial premises and out-of-town retail outlets within close proximity to Croydon Town Centre, Purley Town Centre, Wandle Park and accessible from central London and wider South East

### What are the key issues about the Purley Way to consider?

- There is a need to facilitate considerable growth in residential and mixed use development along the Purley Way which must be delivered without undermining Purley Way's industrial land and occupiers.
- New commercial development has been very limited since 2008, yet the demand for commercial space is outstripping current supply and as a result commercial rents have significantly increased.
- In depth research is needed to understand what form of commercial development and activity is likely to be attracted to the Purley Way in the future.

- Out of town retail and leisure activity is likely to change in the future which will influence planning policy and how development comes forward.
- There is a need to ensure mixed-use development provides appropriate spaces for commercial uses to thrive whilst also providing high quality living spaces and amenity for residents.
- The street environment of Purley Way is unpleasant owing to the dominance of the heavy traffic which causes severance.
  - The green, social and physical infrastructure required to support considerable development growth needs to be carefully considered and planned to ensure existing and future communities are well supported. This will include a full exploration of funding options to ensure the successful delivery of the necessary infrastructure.
- Wandle Park should be an asset and somewhere to use in conjunction with a visit to Purley Way and Croydon Town Centre but it does not happen as it is difficult to move between these three areas as a pedestrian or cyclist.

### Where we want to be

A comprehensive masterplan and planning framework will facilitate the transformational redevelopment of the Purley Way to create a series of new quarters of high quality design, coherent place with a rich mix of uses including a residential, community, and increased more intense economic activity, supported by social infrastructure, improved public realm, green infrastructure and sustainable transport.

should be strong protection for industrial and warehousing uses in Strategic Industrial Locations.

<sup>23</sup> Strategic Industrial Locations are the most important industrial areas in London as identified by the Mayor of London in the London Plan. There

## How could these issues be addressed through planning policy?

Policy options include:

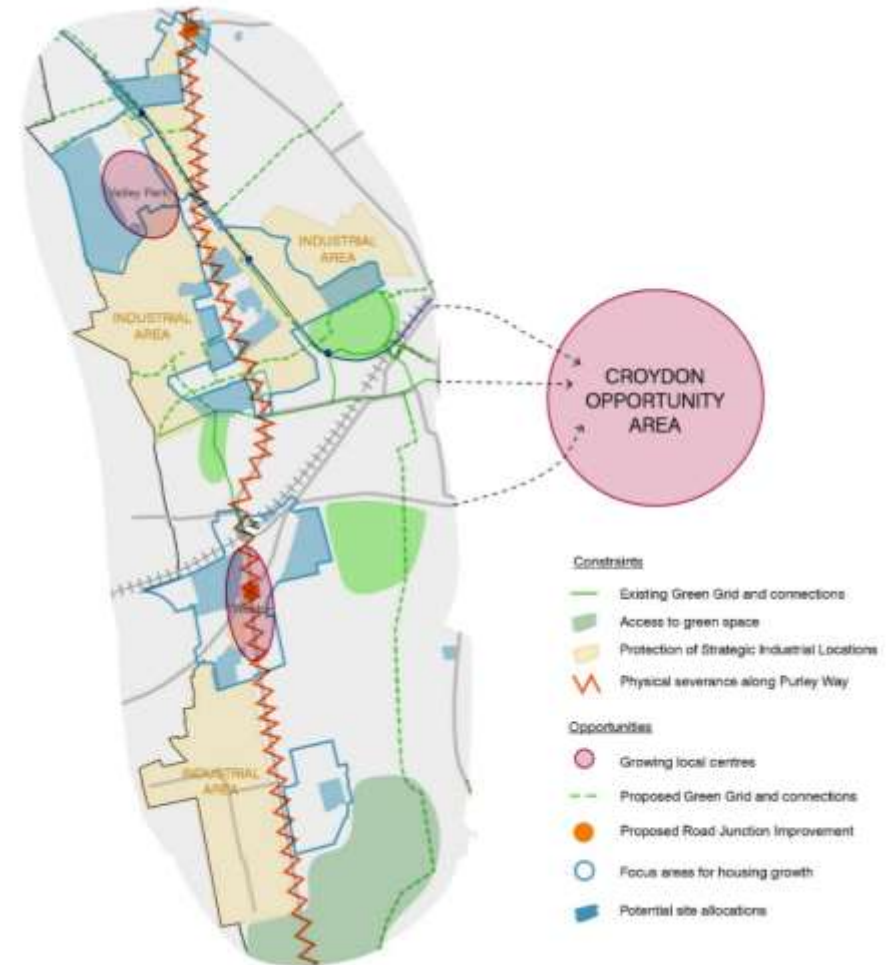
- Prepare a Masterplan to guide development in the Purley Way, and incorporate those elements that are essential to the successful regeneration of the area in a dedicated chapter of the Local Plan review.
- Ensure new development knits well with existing communities within and around the Purley Way.
- Consider the Purley Way as an Opportunity Area, which can accommodate a new innovative residential community, helping to significantly address the borough's housing need.
- New development focuses on creating places/neighbourhoods rather than a corridor of development.
- Facilitate considerable growth and change to grow this community, which respects the commercial importance of the Purley Way, particularly the Strategic Industrial Locations.
- Continue policy protection of the Purley Way Strategic Industrial Locations whilst supporting the potential for intensification of commercial and industrial space.
- Set clear parameters for development, such as land use, height, massing and infrastructure mitigation to ensure sites are utilised fully, but developed in a sustainable and appropriate manner.
- Provide clear policies and design guidance to ensure that mixed use development is successfully co-ordinated and functions well for both businesses and residents.
- Utilise the masterplanning process to establish strong sustainable connections to Wandle Park, Central Croydon and Purley Town Centre.
- Provision of new infrastructure provides opportunity to bring together new and existing community.
- New pedestrian and cycle routes, including the expectation that new major developments connect to the pedestrian/cycle network and public transport stops and stations.
- Plan for the infrastructure (green, social and physical) needed to support good growth<sup>24</sup> along the Purley Way and create a functioning and coherent place.
- Public realm and landscaping to reduce the dominance of car/address air quality.
- Create parks and green links of varying scales to form part of a green grid along the western side of the borough linking Croydon cemetery to Roundshaw Downs through the Purley Way area.
- Establish a set of projects which address the poor urban environment, improve the public realm and the reduce the dominance of the A23.
- Promote the extension of the tram from Ampere Way south along the Purley Way to Purley Town Centre to greatly improve connectivity and support housing growth to improve quality of life for all Croydon's vibrant and diverse communities.

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<sup>24</sup> Includes reducing car dominance, providing inclusive access to public transport, creating well connected communities and uses the "Healthy Streets" approach (Mayor of London, Good Growth by Design 2017).

## Help us to create a Purley Way chapter in the Local Plan review and a Masterplan

78. Can you tell us about any issues you'd expect from our proposals for a new residential and commercial neighbourhood on the Purley Way?
79. What infrastructure (green, social and physical) is needed to support a new residential and commercial neighbourhood on the Purley Way?
80. What would help encourage more sustainable travel between Purley Way and Central Croydon/Purley Town Centre?
81. Should we consider developing a new zero carbon district to act as an example of good practice for London? Please explain your answer.
82. Are there any other policy options that we should be focussing on? Please explain your answer.



## Housing Design

### Did you know?

- The residential tower currently under construction at 101 George Street will be the tallest modular tower in the world once complete
- Croydon has a Place Review Panel, an independent, multidisciplinary and expert panel that regularly reviews large, complex and/or strategic schemes early in the development process
- The council employs architects, urban designers, landscape architects and policy experts in-house to review proposed developments and continue to raise the quality of development across the Borough

### Where we want to be

To support the creation of inclusive housing with a high quality standard of design that is distinctive and responds to and enhances the character and context of the local area.

### What are the key issues about housing design to consider?

- The drive to deliver additional housing should not lead to poor quality homes for the most vulnerable residents.
- In light of the housing target, there continues to be the need to provide high quality design across new developments that are informed by their context without compromising local character, heritage and sense of place.
- Shared spaces, amenities, public realm and landscape design in housing developments need to be well designed so the future residents can enjoy these spaces to have a decent quality of life.

- The makeup of our households and getting the most out of our homes, so that they are fit for a wide range of the population, requires a mixture of housing types.
- Increasingly there will be a need for accessible and lifetime homes so that new housing stock is suitable for a wide variety of needs of residents.
- Need for sustainable developments that are future proofed with integration of smart and digital infrastructure to foster sustainability post occupation.
- New developments can contribute far more than the existing building stock, to reducing greenhouse gas emissions and climate change challenge.
- Some specialist housing may free up the existing housing stock and enable those with specific needs to enjoy a more suitable living environment, lessening the burden on public services such as hospitals.

### How could these issues be addressed through planning policy?

Policy options in addition to those already included in the Croydon Local Plan 2018, include:

- Provide more robust housing design policies that ensure inclusive design, such as; shared entrances and amenities, high quality public realm and landscape architecture with integration into the wider public realm.
- Identify and promote design and quality standards that will help to produce more inclusive housing for older people and people with disabilities, as well as accessible and lifetime homes.
- Build upon our understanding of the character of our 16 Places, the evolution of the suburbs and improved public

realm as a way to increase densities and deliver higher urban densities.

### Help us to create policy to deliver high quality and well-designed new homes in Croydon

83. What would make living in a flat more appealing to a family? We are especially keen to hear about what design and facilities.
84. What features make a development more suitable and appealing for elderly residents?
85. How can we encourage the development of zero-carbon homes? How do you think digital infrastructure help facilitate this?
86. Are there any other policy options that we should be focussing on? Please explain your answer.

## Urban Design, Heritage and Local Character

### Did you know?

- Croydon lies on ancient Roman roads has always been an established market town with trade routes that were central to its prosperity in medieval times and it still retains those key transport connections today
- Croydon's Suburban Design Guide is helping to inform the design and character of our suburbs for the future
- Croydon's Public Realm Design Guide is helping inform and guide the design of public spaces.
- Croydon centre has experienced boom and bust in the past but there is a comprehensive plan for its future through improvements to public realm and infrastructure through 'Growth Zone'<sup>25</sup> investment
- Croydon's heritage is still evident with a healthy number of listed buildings (167), conservation areas (21), 8 scheduled monuments, and 3 registered parks and gardens, as well as notable locally listed buildings, historic parks and gardens and local heritage areas

### Where we want to be

New development will respect the existing local character and distinctiveness of Purley, referring to the Borough Character Appraisal to inform design quality, with opportunities for public realm improvements primarily focussing on the District Centre whilst seeking to improve links to open space. Any buildings and conversions should be of a high standard of design to ensure the character of the Centre and the Conservation Area are respected. The gistered Historic and Local Historic Parks

and Gardens in the area will be retained and new links provided where possible, to incorporate them into the Green Grid network. Developments across the borough will respond positively to the urban design, townscape, heritage and local character of Croydon's 16 Places, whilst delivering a significantly higher number of homes. Developments will reinforce local distinctiveness by responding to, and enhancing their context, character and heritage. Any development and conversion will be of a high standard of design, respect and enhance Conservation Areas and heritage assets. Urban and architectural design and placemaking will have a consistent and high quality standard of design, to support places where people can live, work and play within their neighbourhood.

<sup>25</sup> In 2014, Croydon's Town Centre was designated only the second Growth Zone nationally. This released over £500M to finance and deliver a

major regeneration programme to unlock further growth in the centre and beyond.



### What are the key issues about urban design and local character to consider?

- Places in Croydon have distinct histories, architecture and characters, from which distinct identities and heritage arise. Redevelopment needs to consider and respond to these.
- Tall buildings are being built in Croydon and in light of the housing target, this is expected to continue but the acceptable locations may need to be defined clearly to ensure that this increase in housing numbers are in the most sustainable locations, which respond positively to local character, townscape and the setting of heritage assets.
- As the borough's population increases, the design and quality of its streets, paths and other shared environments becomes even more important. Well-connected, people friendly streets can encourage healthy lifestyles and alternatives to car use, whilst providing spaces that are comfortable to walk through and dwell in.
- Creative and cultural industries have potential to positively contribute to urban design and character.
- The changing nature of the retail sector will impact not only central Croydon but on the character and vitality of all of the high street and town/neighbourhood centres in the borough.

### How could these issues be addressed through planning policy?

Policy options, in addition to those already included in the Croydon Local Plan 2018, include:

- Identify the best landmark locations where tall buildings across the borough will be able to deliver additional housing and create interesting and high quality urban focal points.
- Use heritage-led regeneration that builds upon the rich local history and character and helps to preserve and enhance the existing heritage assets.
- Make sure that the shared environment is enhanced and improved so that streets are still welcoming alongside the delivery of additional homes.
- Check that the existing Croydon Local Plan 2018 policies are innovative and adaptable enough to enable new and emerging smart/digital infrastructure to be allowed to enhance sustainable development.
- Ensure the shared environment is enhanced/improved to create high quality spaces that can accommodate the more intensive use that additional homes will demand.
- Policies on the protection, evolution and change of local character for different areas of the borough that relate to the strategic options.

Help us to create policy which supports Croydon's unique character through high quality design.

87. Where do you think high density developments (including tower blocks and other models of high density) should be located other than Central Croydon?
88. How can we improve public spaces to support a range of community activities across the borough?
89. Are there any other policy options that we should be focussing on? Please explain your answer.

## Community Facilities – Health and Education

### Did you know?

- Croydon has the highest percentage of young people (aged 0-17) of any London borough
- The borough's population is set to grow by 14% from 385,000 to approximately 445,000 by the year 2031
- Through successful allocations in the current Local Plan, two new primary schools and three new secondary schools have been granted planning permission since 2016

### Where we want to be

The borough's health and education facilities will reflect the diverse population, address their needs, facilitate improved education achievement, promote healthy lifestyles, as well as be of high-quality, adaptable for future generations' needs and be located and delivered in locations commensurate to where the borough's housing is to be accommodated. The council will work closely with the providers of these facilities to ensure there is the sufficient capacity, as their provision is not in the direct control of the council.

### What are the key issues about health and education to consider?

- With the required increase in housing, the current and future residents of Croydon should have access to appropriate community facilities, for education and learning at all ages (including libraries), health, religious, sporting, cultural and creative use.
- Despite the considerable number of new schools delivered recently, to accommodate the increased housing need it is estimated that six new primary schools will be needed, in

phases, by 2039. Specific sites will need to be allocated in the Local Plan review.

- In the current Local Plan, there are four site allocations for secondary schools. Unless already under construction, these will continue to be allocations in this review of the Local Plan. Based on population projections, and the assumption that all surplus spaces in existing and planned secondary schools are occupied first, at this early stage no new secondary schools will be needed by 2039. The council will continue to monitor school place projections and may determine additional need for secondary schools if all spaces in current and existing schools cannot be filled.
- Croydon's level of skills at degree level or above remains below the London average, acting as a disincentive to inward investment and high-knowledge industries locating here.
- Higher education provision is planned to be enhanced by the provision of a creative university campus in the early part of the plan period.
- In a fast changing world, the skills needed for employment and wider knowledge require constant informal and formal learning throughout life.
- Delivery of NHS healthcare services have recently undergone a mode change whereby services are now being delivered through community hubs and in home care, rather than through multiple smaller GP surgeries. This means that more floor space is needed and facilities must be fit for purpose as well as flexible for future need or changes.

- In light of the new housing target, and considering planned healthcare expansion in New Addington, Coulsdon and central Croydon, it is estimated at this stage that a net figure of between 12,000 and 13,000 square metres of floor space for health care provision will need to be provided.
- In locations where a co-located community and healthcare hub is not suitable, space for GP practices will need to remain safeguarded.

#### How could these issues be addressed through planning policy?

Policy options include:

- Allocate sites for schools and healthcare facilities that will meet the needs of the borough, and in particular the needs of Places that are planned to see greatest growth as part of the Local Plan review.
- When there are no other sites, allocate schools to be built on policy-constrained land to ensure there is sufficient space for play grounds and sports facilities.
- Encourage the co-location of community services, which could also integrate healthcare delivery, in sustainable, accessible locations and within buildings capable of future adaptation.
- Encourage community uses within mixed use, residential-led developments.
- Enable a creative university campus and higher education programmes in Croydon.
- Encourage the provision of infrastructure and facilities for learning and developing skills in creative industries and other practical professions e.g. print studios, workshop spaces, and community kitchens.

#### Help us to create policy which supports the provision of health and education facilities in Croydon

90. Thinking about health and education provision in Croydon, what's the most important thing to you?
91. What other types of health and education infrastructure need to be provided alongside the homes proposed?
92. How can high quality schools be provided on smaller sites in the borough?
93. Are there any other policy options that we should be focussing on? Please explain your answer.

## Community Facilities – Social Infrastructure

### Did you know?

- Croydon is a diverse borough, with over 50% of the population being Black, Asian and Minority Ethnic (BAME) and with over 100 languages spoken. This rich diversity contributes to and enhances the local cultural landscape and economy; the varied requirements need to be considered in the development of accessible social infrastructure
- The council has supported the creation of a number of community facilities including the recently delivered Legacy Youth Zone<sup>26</sup>
- There are approximately 1000 registered charities in Croydon, making it the largest Voluntary and Community Sector in outer South London.

### Where we want to be

The borough's social infrastructure will reflect the diverse population, address their needs and promote healthy lifestyles, as well as be of high-quality and adaptable for future generations' needs. Each Place should have a range of facilities that enables and supports active, vibrant and engaged communities.

### What are the key issues about community facilities to consider?

- To help residents find the information and support they need within their local community, the council is increasingly working to integrate community services and facilities, such as health and social care, children's

services, centres and nurseries, and voluntary and community sector bodies. For example, as well as providing library services Thornton Heath Library hosts job clubs, homework clubs, parent and baby classes, older people's sessions and IT taster sessions.

- There are a number of low-quality sports and leisure facilities in the borough, and significant mismatches in supply and demand for certain facilities. The council is actively taking steps to address these issues, including the introduction of a hub-and-spoke model for pitch provision, the refurbishment of some of the council's leisure centres, and the creation of masterplans for some of our parks which include recommendations for leisure provision improvements.
- Our parks, open spaces and public realm are great locations for community events and activity, and play a vital role in creating community cohesion and healthy neighbourhoods. These need to be continually developed and new sustainable models tested so that they are accessible to and serve all parts of Croydon's diverse population. The Croydon Public Realm Design Guide and other regional guidance is in place to steer their development and also look to diversify and promote healthy lifestyles including integration of urban farming, community kitchens and cafes.
- There is a need to provide new burial plots in the borough.
- The importance of public houses as a community asset has been recognised through the National Planning Policy Framework, which requires local authorities to 'plan positively' for such uses.

<sup>26</sup> Croydon's Youth Zone, named by young people as 'Legacy', is a purpose-built facility for the borough's young people aged 8 – 19, and up

to 25 for those with additional support needs. It is London's third Youth Zone and is located on Whitehorse Road, Selhurst.

- Creative and cultural industries, as well as the council's Meanwhile Use projects, have a positive track record in Croydon of facilitating community activities, such as Meanwhile Croydon, Croydon Youth Arts Collective, Croydon Arts Store and Turf.
- The importance of high quality, accessible social infrastructure and community facilities that serves all parts of Croydon's diverse population, including the needs of our young people.
- The need to provide more publically accessible toilets meeting 'Changing Places' standards in our town centres.
- An additional need for community facilities may arise given the development growth proposed in the borough, however further work with delivery partners to quantify what that need is on a Place-based basis is required.

#### How could these issues be addressed through planning policy?

Policy options include:

- Protecting and enhancing existing community facilities that continue to meet the needs of residents, including public houses.
- Support the creation of new accessible community spaces, activities and facilities in appropriate locations commensurate to the growth of the borough.
- Support creation of sustainable activities and processes such as urban farming, community kitchens and cafes.
- Facilitate and support a high quality, welcoming public realm and open spaces that are well connected and designed for active lifestyles including walking and cycling, as well as promoting the borough's biodiversity and improves air quality

- Support entrepreneurial, creative and cultural industries in facilitating community activities, and support these industries co-location in spaces which encourage efficiency of use.
- Encourage better use of existing and new community facilities (for example making more use of school facilities outside of school hours).

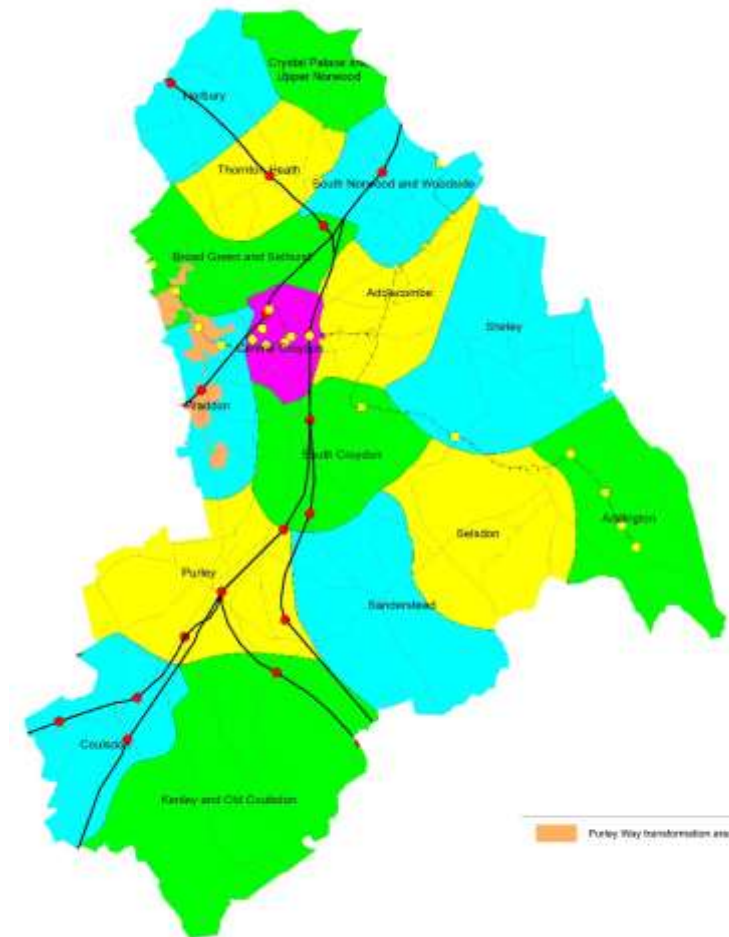
#### Help us to create policy which supports the provision of social infrastructure in Croydon

94. Thinking about community facilities like libraries or leisure centres, what's the most important thing to you?
95. Is there a need for new or improved community facilities where you live or work?
96. How we could do more to support Croydon's creative and cultural industries to provide more community activity?
97. How we can support existing community facilities?
98. Are there any other policy options that we should be focussing on? Please explain your answer.

## The Places of Croydon

This section of the consultation document provides a summary of the key issues and the growth scenario for the strategic options for each of the Places of Croydon:

- Addington;
- Addiscombe;
- Broad Green and Selhurst;
- Coulsdon;
- Central Croydon;
- Crystal Palace and Upper Norwood;
- Kenley and Old Coulsdon;
- Norbury;
- Purley;
- Sanderstead;
- Selsdon;
- Shirley;
- South Croydon;
- South Norwood and Woodside;
- Thornton Heath; and
- Waddon.



### Allocating land for development:

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities, for each Place. For each site, the proposed use and indicative number of homes (if applicable) is provided.

### Local Green Spaces

National planning policy says that local communities should be able to identify for special protection green areas of particular importance to them by seeking their designation as Local Green Spaces in Local Plans. By such designations, local communities will be able to rule out new development other than in very special circumstances. Local Green Space is a designation under the planning system that can only be awarded to certain green spaces should they demonstrate meeting the following nationally set criteria:

- Be local in size and not an expansive tract of land;
- Be publicly accessible; and
- Be demonstrably special and have a particular significance to the community it serves.

In 2016, as part of the preparation of the Croydon Local Plan 2018, the council tried to gain this extra layer of protection for all of Croydon's parks and green spaces that met the above mentioned criteria. All identified sites were put forward to be designated, however, none of them were granted the Local Green Space designation as the Planning Inspector, appointed by the Secretary of State to review of Local Plan, felt there was not enough local evidence to prove how these

spaces were special/important to local communities, or that they hold any particular local significance. In particular he said that *“many of [the characteristics identified by the council], such as a community garden, children’s play area, natural open space, playing field or recreation ground seem rather commonplace with the consequence that, even where three of these co-exist, the criterion of ‘demonstrably special’ or of ‘particular’ significance within the terms of [national planning policy] is not met.”*

In preparation for the Local Plan Review, between 4<sup>th</sup> June 2019 to 22<sup>nd</sup> July 2019 the council asked local residents to tell us which green spaces were special to them and why. The responses received have been reviewed by the council. In reviewing the responses the council has had in mind the following comments made by the Planning Inspector who examined the current Croydon Local Plan 2018 in which he said:

*“A large number of [representations made to the council about designating particular spaces as Local Green Space] argue for the general benefits of open space to recreation and health. These are undisputed but, by definition, general benefits do not amount to the special justification needed to support Local Green Space designation on a specific site. Others argue for the historic interest of particular places or pointed to their ecological or nature conservation interest. These too cannot be disputed but... the [Croydon Local Plan 2018] already contains policies to protect land with these characteristics. Other [representations] provide pointers to the kind of criteria that the council may wish to use in the [Local*



*Plan] Review which I recommend... The concept of Local Green Space is not simply about maintaining a quantitative standard of open space or facilities, important though that is; it is concerned with boundaries which are capable of enduring beyond the end of the plan period, i.e., not just ensuring that a sufficient quantity of open space is provided or retained in an area but that it be provided or retained on the particular site in question because its location has particular importance to the local community, possibly as the result of an event on the site or as the result of a campaign of acquisition or gift in relation to the site.”*

Where responses have indicated that there is a feature or use of a green space that is beyond a general benefit; and it is not a feature protected by another Local Plan policy; then they are proposed in this Issues and Options consultation as a possible Local Green Space. The possible Local Green Spaces are set out under each Place, and include the reason that why they might be demonstrably special. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents’ association and ‘friends of’ groups asking for further information about the ‘demonstrably special’ feature of the green space.

### Other green spaces to be protected through the Local Plan Review

Just because a green space has not been put forward as a proposed Local Green Space, it does not mean that it is a development site. All green spaces are important; even more

so in the context of a need for 46,040 homes by 2039. These new homes will require access to green spaces. Therefore, other green spaces will be protected in the Local Plan review under an ‘other green spaces’ policy. Many of them will also be part of the green grid network of open spaces proposed in the Green Grid section of this Issues and Options consultation document.

Those spaces that are proposed to be protected through an ‘other green space’ designation because they are not Green Belt or Metropolitan Open Land and are not demonstrably special enough to be Local Green Space include the following types of space:

- **Town parks and natural open spaces** – These are large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children’s play for different age groups and informal recreation pursuits. The category also includes larger areas of natural open space. They will usually provide recreation for an entire Place and can be up to 20ha in size.
- **Local parks and natural open spaces** – These provide for court games, children’s play, sitting out areas and nature conservation areas; or they are slightly larger areas of natural open space. They serve more than the neighbourhood in which they are located, but won’t serve an entire Place. Usually they will be under 2ha in size.

- **Neighbourhood parks and natural open spaces** – These also only serve the neighbourhood in which they are located but will be more formal green spaces. They include public gardens, sitting out areas, children’s play spaces or other areas of a specialist nature, including nature conservation areas. Generally they are under 1ha in size.
- **Informal green spaces** – These are small areas of informal open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and small amounts of play equipment. Typically they will serve only the neighbourhood in which they are located, and are generally under 0.4ha in size.
- **Linear open spaces** – These are paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.

Under each Place in the following parts of this consultation document, each of the known Town, Local and Neighbourhood parks and natural open spaces are listed. Informal green spaces and linear open spaces are also proposed to be protected, but they are too numerous to list individually in the Local Plan review. These include many spaces suggested to the council earlier in 2019.

# Addington

## Addington



- | Existing  | Proposed                            |
|---|-------------------------------------|
| Built Environment                                 | Proposed Green Grid and connections |
| Existing Green Grid and connections               | Public Realm Improvements           |
| Metropolitan Green Belt                           | Proposed Road Junction Improvement  |
| Metropolitan Open Land                            | Potential School Site               |
| Non designated green space                        |                                     |
| Locally listed Historic Parks and Gardens         |                                     |
| Registered Historic Park and Gardens              |                                     |
| Conservation Areas                                |                                     |
| Croydon Panorama                                  |                                     |
| Tier 1 Integrated Industrial Location             |                                     |
| Industrial Area                                   |                                     |
| Tramway   |                                     |
| Roads   |                                     |
| Schools (Primary and Secondary)                   |                                     |
| District Centre                                   |                                     |
| Neighbourhood Centre                              |                                     |
| Local Landmarks (Numbered)<br>1. Addington Palace |                                     |



## Where we want to be

A self-contained community, Addington, will be a location for limited growth. It will capitalise on good links to and from central Croydon, and its strategic position between Croydon Town Centre and Biggin Hill Airport, along with their concentration of supporting infrastructure. As such, it will see its community of residents, workers and visitors gradually expand/grow and diversify. It will continue to comprise interwar and late 20th century housing surrounded by Green Belt, something that is typical of its local character and new developments will respond to and enhance. The Place will be enhanced with infill development that sensitively responds to its heritage and local character, and a rejuvenated Town Centre with a mixture of homes, health, community and cultural facilities and a range of commercial facilities, services and retailing, including many independent shops. The ancient village at Addington will retain its rural village character.

## Opportunities, constraints and change up to 2039





- With good supporting infrastructure provision opportunities for new development will be mainly infilling and increasing in density as land is physically constrained by the Green Belt. Croydon's Suburban Design Guide, along with wider policies, will need to guide this evolution. Under Strategic Option 3 there is potential for an urban extension on Green Belt land along Lodge Lane and North Downs Crescent.

- There is potential for an urban extension on Green Belt land across the tram line from Lodge Lane and North Downs Crescent.
- There will be continued protection for industry and warehousing in the Vulcan Way industrial area.
- The Town Centre will maintain its support of the local community, providing retailing, some employment and services.
- New development will respect and enhance the existing local character and local distinctiveness, referring to the Borough Character Appraisal to inform design quality and growth/development guidelines. Public realm improvements will focus on the Town Centre to assist in the regeneration of the area with the designated Village Green placed at the centre, active frontages. They will be high quality, inclusive and accessible, and be guided by the Croydon Public Realm Design Guide whilst encouraging shopfront improvements and development of the local economy/commercial and retail offer.
- Walking and cycle links to local schools, the Town Centre, Vulcan Way industrial area and surrounding open space will be improved where possible. These will connect to the ancient Roman road on the borough boundary with Bromley.
- The tram, with improved services with a potentially extended tram route, will continue to provide a valued link to Croydon Town Centre and connections to Central London and Gatwick Airport. An extension of the tram further into New Addington from its current

terminus to New Addington south will be investigated by the council. The community will enjoy better quality, more frequent and reliable bus services connecting with Central Croydon. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or use of public transport, which may also need to diversify in types of services provided.

### Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 2 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	26		
Number of homes in Addington in 20 years ( <i>the proposed Place target</i> )	280 to 350	190 to 230	190 to 230 <i>(plus 2,560 to 3,030 new homes on an urban extension on Green Belt land along Lodge Lane and North Downs Crescent)</i>

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 2 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
What it looks like spatially			
			
Description of the option	<p>About two-thirds of growth will take place in the form of windfall development. Those areas within 800m of New Addington Town Centre or a tram stop will see</p>	<p>About half of all growth will take place in the form of windfall development. Outside of New Addington Town Centre, there will be less change to the existing</p>	<p>Within the existing urban area of New Addington, half of all growth will take place in the form of windfall development. Outside of New Addington Town Centre, there</p>

	<p><b>Strategic option 1 – All residential growth to take place in the existing urban area.</b></p>	<p><b>Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.</b></p>	<p><b>Strategic option 2 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.</b></p>
	<p>some evolution of their existing character (apart from in Addington Village Conservation Area, which will see little change). Elsewhere there will be less change. The council will seek a tram extension further into New Addington from its current terminus on Central Parade to New Addington south.</p>	<p>character of the area. The council will seek a tram extension further into New Addington from its current terminus on Central Parade to New Addington south.</p>	<p>will be less change to the existing character of the area. This is because some pressure is taken away from existing residential areas because of limited release of Green Belt land for development, including an urban extension to New Addington taking part of the golf course adjacent to the tram tracks/Lodge Lane, and continuing south around part of North Downs Crescent. The council will seek a tram extension further into New Addington from its current terminus on Central Parade to New Addington south.</p>

### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
1	Land Fronting North Downs Road and Overbury Crescent	Residential development	18 to 64
120	Timebridge Community Centre, Field Way	Secondary school buildings	n/a

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green area to be protected by Local Plan review	Type of other green space
Castle Hill Avenue Playground	Neighbourhood parks and play spaces

### Help shape the future of the Place of Addington

99. How should Addington change to help meet the need for homes and infrastructure in the borough?
100. What other potential development sites in Addington should the Local Plan review allocate for development?
101. Do you think any proposed sites in Addington should be removed from the Local Plan review? If so, which one(s)? Please explain why.
102. What community facilities in Addington are important to you?
103. What new community facilities are required in Addington?
104. Are there any green spaces in Addington that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
105. Are there any other green areas in Addington (that are not informal green spaces, linear open spaces or Green Belt) that should be protected? Please explain why.



# Addiscombe

## Addiscombe



- | Existing                                       | Proposed                            |
|--|-------------------------------------|
| Built Environment                              | Proposed Green Grid and connections |
| Existing Green Grid and connections            | Public Realm Improvements           |
| Metropolitan Green Belt                        | Proposed Road Junction Improvement  |
| Metropolitan Open Land                         | Proposed Cycle Hub                  |
| Non designated green space                     | Potential Primary School Site       |
| Locally listed Historic Parks and Gardens      |                                     |
| Conservation Areas                             |                                     |
| Local Heritage Areas                           |                                     |
| Area of Focussed Intensification               |                                     |
| Local Designated View                          |                                     |
| Railway  |                                     |
| Tramway  |                                     |
| Railway Station                                |                                     |
| Roads  |                                     |
| Schools (Primary and Secondary)                |                                     |
| Independent Schools                            |                                     |
| District Centre                                |                                     |
| Neighbourhood Centre                           |                                     |
| Scheduled Monument                             |                                     |
| Local Landmarks (Numbered)<br>1. No. 1 Croydon |                                     |



## Where we want to be

Addiscombe will continue to be centred on the vibrant Town Centre with an historic Conservation Area, a mixture of homes, civic, community and cultural facilities and a range of retail and commercial offer and services including many independent shops. Ashburton Park and Lower Addiscombe Road/Cherry Orchard Road Neighbourhood Centres will support the existing and future community with services and facilities beyond a retail function.

## Opportunities, constraints and change up to 2039

- Sustainable growth of the suburbs across most of Addiscombe including some opportunity for windfall sites, and limited infilling with new homes that respect and enhance existing heritage, residential character and local distinctiveness. In the south east of the Place there is potential for more intense development in areas where the homes are on larger plots of land.
- East India Estate Conservation Area is defined by a concentration of high quality historic buildings, spaciousness and a strong 'ladder' structure of roads. Whilst retaining those buildings that contribute to the character of the area (with potential for some sensitive conversion), there is opportunity for sensitive development that follows the strong spatial qualities and formal layout of the area. Reinforcement of street trees would enhance the character of the area.
- Addiscombe's Town Centre will continue to provide its vital retail function, key commercial activity and services. Inclusive and accessible community facilities

for all demographics will be encouraged to locate in close proximity to the Town Centre.

- Opportunities for public realm improvements will focus on the Town Centre with building and conversion works of a high standard of design to ensure the character of the Centre and Conservation Area are respected and enhanced.
- There will also be a focus on the public realm in the west of Addiscombe to ensure a better environment for pedestrians and cyclists.
- High quality improvements to, and expansion of the Green Grid will be sought to promote strategic east-west and north-south links through Addiscombe Linear Railway and Ashburton Parks. These will connect with Central Croydon, Wandle Valley Regional Park, Lloyd Park and South Norwood Country Park facilitating a walking and cycling network and starting to foster a biodiversity network with further guidance to follow.
- Addiscombe will continue to be a highly accessible Place with its six tram stops and connections to East Croydon, Beckenham Junction and Elmers End railway stations. It will benefit from improved tram services, from investment in tram stock and more frequent services. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys.
- The council will consider investigating the feasibility of potential future rapid transit route/tram extension towards Hayes.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	149		
Number of homes in Addiscombe (the proposed Place target)	1,480 to 1,880	1,030 to 1,310	1,030 to 1,310
What it looks like spatially			

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Description of the option	<p>Most growth will be in the form of windfall development. Outside of Conservation Areas, some areas in the south east of Addiscombe, where homes are typically on larger plots and are in the most accessible locations<sup>27</sup> will see some focused intensification, resulting in a gradual change in character to denser forms of development. Elsewhere, areas with homes on larger plots will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. In other parts of Addiscombe, outside of the Town Centre, there will be some evolution within the existing character of the area. Throughout Addiscombe, Conservation Areas will see little change.</p>	<p>Most growth will be in the form of windfall development. Outside of Conservation Areas, some areas in the south east of Addiscombe, where homes are typically on larger plots and are in the most accessible locations<sup>28</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere in Addiscombe, outside of the Town Centre, there will be less change. Throughout Addiscombe, Conservation Areas will see little change.</p>	<p>Most growth will be in the form of windfall development. Outside of Conservation Areas, some areas in the south east of Addiscombe, where homes are typically on larger plots and are in the most accessible locations<sup>29</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere in Addiscombe, outside of the Town Centre, there will be less change. Throughout Addiscombe, Conservation Areas will see little change.</p>

<sup>27</sup> Locations which have a PTAL of 3 or above or are within 800m of a train station, tram stop or Addiscombe Town Centre

<sup>28</sup> Ibid

<sup>29</sup> Ibid

### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
2	Blackhorse Lane Station	Residential development (over station)	18 to 104
3	Bupa Nursing Home	Residential development within the existing footprint of this listed building	25 to 77
68	130 Oval Road	Residential development	10 to 57

### Possible Local Green Spaces

Within Addiscombe the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Addiscombe Railway Park	This space is actively cared for by the Friends of Addiscombe Railway Park (set up in 2011), who have established a Community Orchard, a Community garden, regular gardening and conservation afternoons and evenings and hold many events in the Park (such as Apple Day in September, Wassail in January, Halloween events for kids). It has become a focal point for many in this area. The Park Friends have been active in increasing the biodiversity in the Park and extending tree cover, planting many trees of diverse native species. In addition there is a strong sense of connection to the railway history of the park.
Addiscombe Recreation Ground	The local residents association (ASPRA) maintain a flower bedded area and the netted areas for

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	ball games and tennis are well used, as is the play area. The scouts and cubs often use it in the summer.
Ashburton Park	Annual Christmas Market Hosts fairgrounds

#### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protect in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Dartnell Road Recreation Ground	Neighbourhood parks and play spaces
Little Road Playground	Neighbourhood parks and play spaces
Whitgift Pond	Neighbourhood natural open space

#### Help shape the future of the Place of Addiscombe

106. How should Addiscombe change to help meet the need for homes and infrastructure in the borough?
107. What other potential development sites in Addiscombe should the Local Plan review allocate for development?
108. Do you think any proposed sites in Addiscombe should be removed from the Local Plan review? If so, which one(s)? Please explain why.
109. What community facilities in Addiscombe are important to you?
110. What new community facilities are required in Addiscombe?
111. Are there any green spaces in Addiscombe that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
112. Are there any other green areas in Addiscombe (that are not informal green spaces, linear open spaces, Metropolitan Open Land or Green Belt that should be protected? Please explain why.

# Broad Green and Selhurst

## Broad Green

### Existing

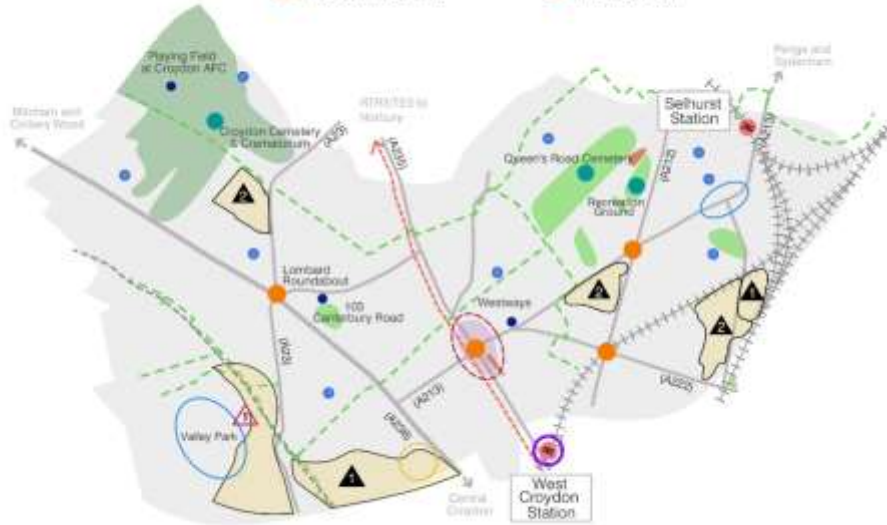
- Built Environment
- Existing Green Grid and connections
- Metropolitan Green Belt
- Metropolitan Open Land
- Non designated green space
- Locally listed Historic Parks and Gardens
- Conservation Areas
- Local Heritage Areas

- Local Designated View
- Enterprise Centre
- Tier 1 Strategic Industrial Location
- Tier 2 Integrated Industrial Location
- Industrial Area
- Railway
- Tramway
- Railway Station

- Roads
- Schools (Primary and Secondary)
- Independent Schools
- District Centre
- Neighbourhood Centre
- Local Landmarks (Numbered) 1, 100, 200

### Proposed

- Proposed Green Grid and connections
- Public Realm Improvements
- Proposed Road Junction Improvement
- Proposed Cycle Hub
- Potential Primary School Site



## Where we want to be

As a broad location, growing residential areas will be interspersed within a network of busy streets with improved connectivity to open spaces and the expanded Green Grid network of the borough. Selhurst Road and Sumner Road/London Road Neighbourhood Centres will support the existing and future community with services and facilities beyond a retail function. The diversity of employment activity and cultures will enliven the area just north of the Central Croydon, as well as being part of the borough's principal industrial location; the Place will have a share in the borough's improving prosperity.

## Opportunities, constraints and change up to 2039

- New residential growth, with opportunities for renewal, will focus on London Road and the Purley Way transformation area. Residential development will respect the existing residential character and local distinctiveness.
- Purley Way, a Strategic Industrial Location<sup>30</sup> and industrial heartland of the borough, will remain a preferred area for industrial and warehousing activity, whilst evolving to enable the colocation of residential uses. This will be supported by the Purley Way policies, allocations and concept Masterplan.
- A thriving day time and evening economy will be centred on the regenerated London Road running from

West Croydon to the re-built Local Centre at Broad Green, which will be the centre of public realm improvements.




- New Green Grid links will be sought to improve connectivity with the green space of Wandle Park, just south of Broad Green, with Croydon Cemetery and Mitcham Common all linking to the Wandle Valley Regional Park.
- To encourage walking and cycling, high quality connections within an attractive environment will be pursued. The tram system in Croydon will be further supported by investigating the feasibility of a potential new rapid transit route/tram extension to Thornton Heath, Norbury via London Road towards Streatham, Tooting and Brixton.

<sup>30</sup> Strategic Industrial Locations are the most important industrial areas in London as identified by the Mayor of London in the London Plan. There

should be strong protection for industrial and warehousing uses in Strategic Industrial Locations.



Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	712		
Number of homes in 20 years in Broad Green and Selhurst <i>(the proposed Place target)</i>	950 to 1,140 <i>(plus 790 to 1,210 homes in the Purley Way Transformation Area)</i>	890 to 1,070 <i>(plus 2,560 – 3,260 homes in the Purley Way Transformation Area)</i>	890 to 1,070 <i>(plus 790 to 1,210 homes in the Purley Way Transformation Area)</i>
What it looks like spatially			



**Description of the option**

Throughout Broad Green and Selhurst, Conservation Areas will see little change. Away from the London Road corridor and the Purley Way Regeneration Area there will be some evolution of existing residential areas, respecting the existing character, although many areas will see little change. Along the London Road there will be some moderate intensification of development resulting in a denser form of development. In the Purley Way Regeneration Area, the retail parks will be redeveloped into a new neighbourhood, mixing retail, leisure and new homes. The council will seek tram extensions along the London Road towards Norbury, and south from Ampere Way down the Purley Way.

Away from the London Road corridor and the Purley Way Regeneration Area there will be less change, with all Conservation Areas seeing little change. Along the London Road there will be some moderate intensification of development resulting in a denser form of development. In the Purley Way Regeneration Area the retail parks will be redeveloped into a new neighbourhood, mixing retail, leisure and new homes. The council will seek tram extensions along the London Road towards Norbury, and south from Ampere Way down the Purley Way.

Away from the London Road corridor and the Purley Way Regeneration Area there will be less change, with all Conservation Areas seeing little change. Along the London Road there will be some moderate intensification of development resulting in a denser form of development. In the Purley Way Regeneration Area the retail parks will be redeveloped into a major new neighbourhood consisting of very high density developments that mix retail, leisure and new homes. The council will seek tram extensions along the London Road towards Norbury, and south from Ampere Way down the Purley Way.

## Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
8	Motor Village Croydon, 121 Canterbury Road	Residential development (possibly with replacement car showroom)	13 to 33
13	Boyden Tiles, Mayday Road	Mixed use residential and industrial/ warehousing development, subject to impact on designated views	20 to 74
20	98 – 100 Lodge Road and 1 – 3 Frederick Gardens	Residential	5 to 20
22	Whitehorse Road garages and parking area, Whitehorse Road estate (Johnson	Residential	5 to 25

Site ref	Name of site	Proposed use	Number of homes (if applicable)
	Road/Cromwell Road)		
78	114-118 Whitehorse Road	Residential conversion and extension	7 to 8
314	Valley Park (B&Q and Units A-G Daniell Way), Hesterman Way  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre.	237 to 641
334	Valley Leisure Park, Hesterman Way  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre.	34 to 90
348	Homebase & Matalan stores,	Mixed use residential and retail development	128 to 482

Site ref	Name of site	Proposed use	Number of homes (if applicable)
	60-66 Purley Way  <i>(a site within the Purley Way transformation area)</i>		
396	Praise House, 145-149 London Road	Redevelopment for mixed use residential and community use	9 to 52
416	Challenge House, 618 Mitcham Road	Residential redevelopment or conversion. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	36 to 136
471	Masonic Hall car park, 1- 1B Stanton Road	Residential development	7 to 39

### Possible Local Green Spaces

Within Broad Green and Selhurst the following green space has been identified as being demonstrably special and of particular significance to the local community. However, for

each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Proposed Local Green Space	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Whitehorse Road Recreation Ground	A community garden has been created in part of Whitehorse Road Recreation Ground.

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Boulogne Road Playground	Neighbourhood parks and play spaces
Canterbury Road Recreation Ground	Local park and open space
King George's Field	Local park and open space
Queen's Road Cemetery	Cemetery or church yard
Wilford Road Playground	Local park and open space

### Help shape the future of the Place of Broad Green and Selhurst

113. How should Broad Green and Selhurst change to help meet the need for homes and infrastructure in the borough?
114. What other potential development sites in Broad Green and Selhurst should the Local Plan review allocate for development?
115. Do you think any proposed sites in Broad Green and Selhurst should be removed from the Local Plan review? If so, which one(s)? Please explain why.
116. What community facilities in Broad Green and Selhurst are important to you?
117. What new community facilities are required in Broad Green and Selhurst?
118. Are there any green spaces in Broad Green and Selhurst that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
119. Are there any other green areas in Broad Green and Selhurst (that are not informal green spaces, linear open spaces or Metropolitan Open Land that should be protected? Please explain why.

# Coulsdon

## Coulsdon



- | Existing                                  | Proposed                            |
|---|-------------------------------------|
| Built Environment                         | Proposed Green Grid and connections |
| Existing Green Grid and connections       | Public Realm Improvements           |
| Metropolitan Green Belt                   | Proposed Cycle Hub                  |
| Metropolitan Open Land                    | Potential Secondary School Site     |
| Non designated green space                |                                     |
| Locally listed Historic Parks and Gardens |                                     |
| Local Heritage Areas                      |                                     |
| Local Designated View                     |                                     |
| Industrial Area                           |                                     |
| Tier 1 Strategic Industrial Location      |                                     |
| Railway                                   |                                     |
| Railway Station                           |                                     |
| Roads                                     |                                     |
| Schools (Primary and Secondary)           |                                     |
| Neighbourhood Centre                      |                                     |
| Scheduled Monument                        |                                     |
| Local Landmarks (Numbered)                |                                     |



## Where we want to be

Croydon's southern-most Town Centre, with a mixture of homes, community and cultural facilities, and a range of retailing including many independent shops, will revive its day and evening economy with the support of the new residential community and facilities on the Cane Hill site, and retained Strategic Industrial Land<sup>31</sup> at Marlpit Lane.

## Opportunities, constraints and change up to 2039




- An area of moderate residential growth based on available land. Residential development will generally respect the existing character and local distinctiveness, although there is potential for more intense forms of development in those parts of Coulsdon where homes are located on larger plots of land.
- Marlpit Lane, with its close proximity to the M25 and good separation from surrounding residential areas will remain an important location for employment growth for Croydon and London retaining strong protection (as a Strategic Industrial Location).
- The Town Centre will continue to support the local community, providing retailing, employment and services with further opportunities for skilled employment where possible, within the Coulsdon area including Cane Hill. Community facilities will be encouraged to locate in close proximity to the Town Centre.

- Coulsdon will remain mainly residential with tree-lined streets becoming more urban in character towards the Town Centre. New development will respect the existing local character and distinctiveness of Coulsdon.
- Opportunities for public realm improvements will continue to focus on enhancements to the Town Centre.
- There will be new walking and cycling links to the green grid, as well as improved bus links to Croydon Town Centre.
- The council will work on the feasibility of a rapid transit route/tram extension from Croydon Town Centre to Coulsdon via Purley (via Brighton Road) in discussion with Transport for London to support housing growth, improve air quality and connectivity, as well as enhance quality of life for all.


<sup>31</sup> Strategic Industrial Locations are the most important industrial areas in London as identified by the Mayor of London in the London Plan. There

should be strong protection for industrial and warehousing uses in Strategic Industrial Locations.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	263		
Number of homes in Coulsdon ( <i>the proposed Place target</i> )	2,050 to 2,490	1,460 to 1,760	1,460 to 1,760
What it looks like spatially			



			
<p><b>Description of the option</b></p>	<p>Most growth in Coulsdon will be on windfall sites. Some areas in the north and east of Coulsdon, where homes are typically on larger plots and are in the most accessible locations<sup>32</sup>, will see some focussed intensification, resulting in a gradual change in character to denser forms of development. Elsewhere, areas with homes on larger plots will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Within Conservation Areas there will be little change. In other parts of Coulsdon there will be some evolution within the existing character of the area. The council will seek a tram extension to Coulsdon.</p>	<p>Most growth in Coulsdon will be on windfall sites. Some areas in the north and east of Coulsdon, where homes are typically on larger plots and are in the most accessible locations<sup>33</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of Coulsdon, including Conservation Areas, there will be less change. The council will seek a tram extension to Coulsdon.</p>	<p>Most growth in Coulsdon will be on windfall sites. Some areas in the north and east of Coulsdon, where homes are typically on larger plots and are in the most accessible locations<sup>34</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of Coulsdon, including Conservation Areas, there will be less change. The council will seek a tram extension to Coulsdon.</p>

<sup>32</sup> Locations which have a PTAL of 3 or above or are within 800m of a train station, or Coulsdon Town Centre

<sup>33</sup> Ibid

<sup>34</sup> Ibid

### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
372	Car park, Lion Green Road	Residential development	157
945	Waitrose, 110-112 Brighton Road	Residential, retail, car parking (and healthcare facility if required by the NHS)	55 to 90

### Possible Local Green Spaces

Within Coulsdon the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Coulsdon Coppice	This space is used by a local primary school as part of their curriculum. It is used to provide learning about nature and the environment on an at least weekly basis.
Coulsdon Memorial Ground	Also known as Marlpit Lane Memorial Ground. Annual memorial service at the War Memorial. The greens have historical importance, operating from the 1930s. This year the greens have welcomed hundreds of kids from youth groups (e.g. Cubs, guides).

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Chaldon Way Gardens	Neighbourhood parks and play spaces
Land rear of Hilliards Heath Road	Neighbourhood parks and play spaces
Scrub Shaw	Neighbourhood parks and play spaces

### Help shape the future of the Place of Coulsdon

120. How should Coulsdon change to help meet the need for homes and infrastructure in the borough?
121. What other potential development sites in Coulsdon should the Local Plan review allocate for development?
122. Do you think any proposed sites in Coulsdon should be removed from the Local Plan review? If so, which one(s)? Please explain why.
123. What community facilities in Coulsdon are important to you?
124. What new community facilities are required in Coulsdon?
125. Are there any green spaces in Coulsdon that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
126. Are there any other green areas in Coulsdon (that are not informal green spaces, linear open spaces or Green Belt that should be protected? Please explain why.

# Central Croydon

## Croydon Opportunity Area



## Where we want to be

Central Croydon has the greatest potential for positive change and will be a focus for growth through flexible and pragmatic planning, with a redeveloped retail core, improved infrastructure, public realm and open space delivered through a series of developments, masterplans and the Growth Zone<sup>35</sup> contributing to the centre's economic prosperity and vitality.

## Opportunities, constraints and change up to 2039

- Residential growth will provide approximately one third of new homes required in the borough. This will be in the form of traditional flatted developments as well as other, newer types of accommodation including build to rent flats and co-living accommodation.
- It will be a major office and residential location in London and the South East retaining its status as a Strategic Office Location reinforced, as well as a varied evening economy focussed on the new Fairfield Halls, Cultural Quarter and Restaurant Quarter.
- Central Croydon will continue to be a major retail destination for South London, focussed on a retail core bounded by Tamworth Road, Poplar Walk, Wellesley Road and George Street, with North End at its heart.
- Fairfield Halls, reopened on the 16<sup>th</sup> September 2019, re-established as a major regional arts facility. The council will now be seeking to refurbish and upgrade the

Clocktower complex (in particular the Museum of Croydon and the Central Library), following the successful relaunch of Fairfield Halls.

- A new creative industry 'Creative Enterprise Zone' will support Croydon's local arts scene and Croydon will look to expand upon its existing higher and further education facilities.
- Through the Growth Zone and masterplanning process opportunities to improve the public realm of Central Croydon will continue to be sought, retaining the best of the existing built environment.
- Proposed improvements to Wellesley Road and improved east-west links will provide more access to the three major parks on the outskirts of Central Croydon, (Wandle Park, Park Hill and Duppas Hill), other Local Historic Parks and Gardens, and the wider Green Grid.
- In the Old Town area of Central Croydon, new development should preserve, enhance and reveal the heritage assets and historic environment of Old Town in accordance with the Masterplan and Conservation Area Appraisals & Management Plans, with high profile heritage assets used as catalysts for the area's success.
- Croydon will remain a major interchange on both the National Rail network and London Overground. East Croydon Station will be regenerated by the Brighton


<sup>35</sup> In 2014, Croydon's Town Centre was designated only the second Growth Zone nationally. This released over £500M to finance and deliver a


major regeneration programme to unlock further growth in the centre and beyond.

Mainline project. This Local Plan, and the masterplans at East and West Croydon will seek to further improve the good access and transport connections to London and beyond and will include major redevelopments of the stations themselves and adjacent development sites.

- The council will investigate the feasibility of new rapid transit routes/tram extensions to/from Central Croydon with Transport for London to support housing growth, as well as improve connectivity and air quality to enhance quality of life for all.

## Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 3 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 2 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	2,443		
Number of homes in Central Croydon <i>(the proposed Place target)</i>	12,830 to 14,510 for all options		
What it looks like spatially			

	
<p><b>Description of the option</b></p>	<p>Central Croydon will continue to be a major focus of growth in the borough. As part of the works on the Brighton Mainline it is expected that land around the railway line will see significant levels of development. Land around West Croydon station will also see development, albeit on a smaller scale. The council will investigate the feasibility of new rapid transit routes/tram extensions to/from Central Croydon with Transport for London.</p>

**Proposed Site Allocations**

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
5	AIG Building, 2-8 Altyre Road	Residential development (possibly with other non-retail town centre uses)	19 to 59
21	Former Royal Mail site, 1-5 Addiscombe Road	Residential led mixed use development incorporating either hotel, office, leisure and/or class A2-A5 uses.	74 to 201
31	Croydon College car	Mixed use redevelopment	159

Site ref	Name of site	Proposed use	Number of homes (if applicable)
	park, College Road	comprising hotel & residential	
33	20-28 Addiscombe Road (Go Ahead House & Easy Hotel)	Residential, office and/or hotel	37 to 105
34	Land Bounded By George St, Park Lane, Barclay Road, And Main London To Brighton Railway Line	Mixed use development incorporating residential use on land behind the Fairfield Halls.	814 to 2098
37	45 Lansdowne Road	Residential development	37 to 117



Site ref	Name of site	Proposed use	Number of homes (if applicable)
40	West Croydon Bus Station	Redevelopment over the bus station to incorporate residential uses and town centre uses (office, leisure, food & drink or hotel). The bus station is to be retained as part of any redevelopment.	45 to 142
41	Direct Line House, 3 Edridge Road	Residential and/or office development, subject to impact on designated views	40 to 126
42	The Lansdowne Building, 2 Lansdowne Road	Mixed use development of office and residential, subject to impact on the heritage of the area	35 to 101
45	East Croydon Station	Mixed use development including redevelopment of the existing railway station	To be confirmed
46	Southern Motor Group, 22 Lansdowne Road	Mixed use development of residential and light industrial	111 to 319

Site ref	Name of site	Proposed use	Number of homes (if applicable)
47	3-7 Park Street	Mixed use residential and ground floor town centre use	13 to 50 (subject to impact on the heritage of the area)
50	44-60 Cherry Orchard Road	Residential development subject to the relocation of the existing business to another site in the borough	120
123	Prospect West and car park to the rear of, 81-85 Station Road	Residential (with healthcare facility if required by NHS)	40 to 288
138	Cherry Orchard Gardens and site between railway line and Cherry Orchard Road, Cherry Orchard Road	Mixed use development of residential with offices, restaurant/café, hotel and/or community facilities	445
142	1 Lansdowne Road	Mixed use development comprising residential,	794

Site ref	Name of site	Proposed use	Number of homes (if applicable)
		with offices, leisure and/or hotel	
148	Canterbury House, Sydenham Road	Comprehensive mixed-use redevelopment including residential (but not including retail)	54 to 153
174	30-38 Addiscombe Road	Residential development	49 to 141
175	Stephenson House, Cherry Orchard Road and Knolly House, Addiscombe Road	Residential and/or office	132 to 380
182	St Matthews House, 98 George Street	Redevelopment for residential and/or offices and/or retail (on George Street frontage)	7 to 20
184	1-19 Derby Road	Residential development above, community uses on lower floors	48 to 137

Site ref	Name of site	Proposed use	Number of homes (if applicable)
186	Jobcentre, 17-21 Dingwall Road	Offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if required by the NHS)	49 to 141
187	28 Dingwall Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)	16 to 44
190	Car park to the rear of Leon House, 22-24 Edridge Road	Residential development	56 to 162
192	Suffolk House, George Street	Mixed use redevelopment with offices or residential dwellings above retail units at ground level	35 to 101
194	St George's Walk, Katharine House and Park House, Park Street	Residential with new civic space and a combination of retail, other Class A uses, leisure and office use.	88 to 504
199	20 Lansdowne Road	Residential development with light	109 to 313

Site ref	Name of site	Proposed use	Number of homes (if applicable)
		industrial workshops and studio spaces	
200	Multi-storey car park, Lansdowne Road	Mixed use, public car park and residential.	133 to 384
201	Lidl, Easy Gym and car park, 99-101 London Road	Primary school with residential development on upper floors	51 to 293
203	West Croydon station and shops, 176 North End	Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above	79 to 455
211	Poplar Walk car park and, 16-44 Station Road	A more intensive use of the site with retail on the ground floor and residential use on other floors subject to the replacement of the car park which provides disabled car parking spaces for the Town Centre	50 to 141

Site ref	Name of site	Proposed use	Number of homes (if applicable)
218	Lunar House, Wellesley Road	Office and residential and/or hotel (with healthcare facility if required by the NHS)	188 to 542
220	9-11 Wellesley Road	Residential and/or hotel and/or retail and/or finance	21 to 60
222	Multi-storey car park, 1 Whitgift Street	Residential with community facilities commensurate in size and functionality to that currently on the site	95 to 193
231	Segas House, Park Lane	Residential conversion with cultural uses if required (with town centres uses considered if there is no interest in delivery of cultural uses).	40
234	Southern House, Wellesley Grove	Offices and residential and/or hotel (with healthcare facility if required by the NHS)	181
236	Apollo House, Wellesley Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)	82 to 234

Site ref	Name of site	Proposed use	Number of homes (if applicable)
245	Mondial House, 102 George Street	Office and/or residential development or offices or hotel and/or retail (on George Street frontage)	30 to 85
294	Croydon College Annexe, Barclay Road	Residential redevelopment with community uses and Creative and Cultural Industries Enterprise Centre	20 to 56
311	Mott Macdonald House, 8 Sydenham Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)	34 to 97
374	Reeves Corner former buildings, 104-112 Church Street	Mixed use with residential to upper storeys and retail on ground floor	23 to 64
393	Whitgift Centre, North End	Expansion of shopping centre, improved transport infrastructure, public realm and residential development	400 to 1000

Site ref	Name of site	Proposed use	Number of homes (if applicable)
417	Stonemead House, 95 London Road	Residential	23 to 64
489	Corinthian House, 17 Lansdowne Road	Retention of offices with residential conversion, and/or hotel (with healthcare facility if required by the NHS)	30 to 85
493	Pinnacle House, 8 Bedford Park	Mixed use of residential with offices (or a healthcare facility if required by the NHS) on the ground floor	44 to 125
950	Norfolk House, 1-28 Wellesley Road	Mixed use development to include retail, residential, office and hotel uses.	125 to 255

### Possible Local Green Spaces

Within Central Croydon the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents'

association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Park Hill Recreation Ground	The land was gifted to the Borough for the enjoyment of the general public. The walled garden within Park Hill Recreation Ground is maintained by the community as a community garden and a Friends Of group manages the space.
Wandle Park	Hosts Croydon Pride, and Music/drama events at the bandstand. It has a Friend's group who organise events.

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

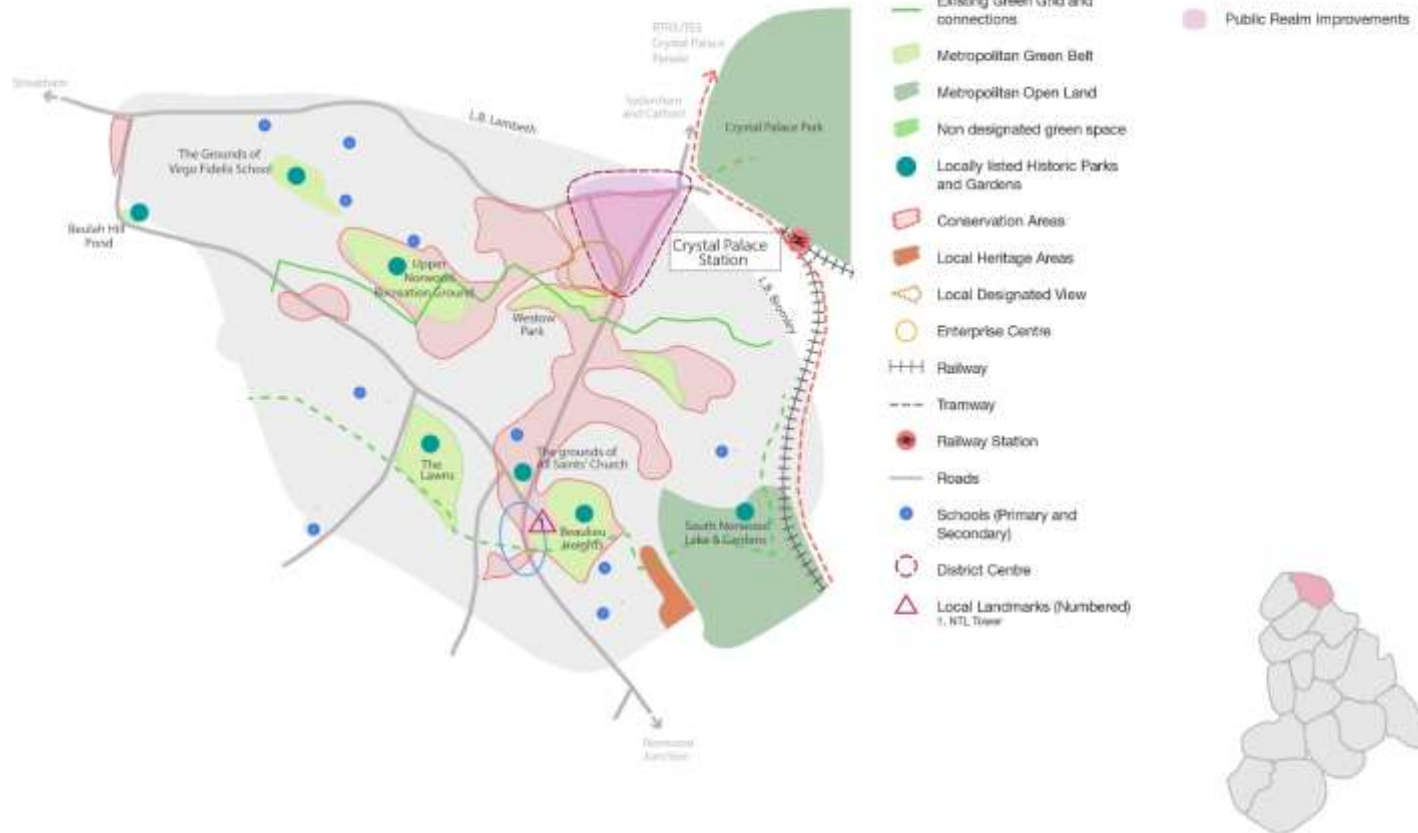
Other green areas to be protected by Local Plan review	Type of other green space
St James' Church Garden	Neighbourhood parks and play spaces
St John's Church Memorial Garden	Cemetery or church yard
The Queen's Gardens	Neighbourhood parks and play spaces

### Help shape the future of the Place of Central Croydon

127. How should Central Croydon change to help meet the need for homes and infrastructure in the borough?
128. What other potential development sites in Central Croydon should the Local Plan review allocate for development?
129. Do you think any proposed sites in Central Croydon should be removed from the Local Plan review? If so, which one(s)? Please explain why.
130. What community facilities in Central Croydon are important to you?
131. What new community facilities are required in Central Croydon
132. Are there any green spaces in Central Croydon that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
133. Are there any other green areas in Central Croydon (that are not informal green spaces or linear open spaces) that should be protected? Please explain why.

# Crystal Palace and Upper Norwood

## Crystal Palace and Upper Norwood





## Where we want to be

The vibrant historic centre, sitting at the apex of four London boroughs, will offer a mixture of homes, community, cultural and leisure facilities; a range of retailing including many independent shops; an employment hub with a thriving arts and enterprise scene will be supported and strengthened by a Creative Arts and Enterprise centre. Sustainable suburban intensification will come through small scale suburban infill development.


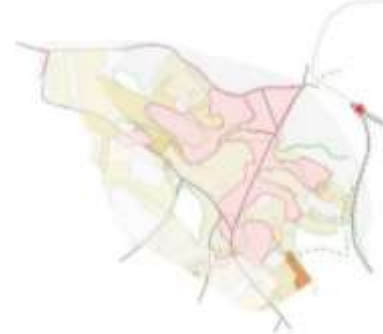

## Opportunities, constraints and change up to 2039


- Sustainable growth of the suburbs with some opportunity for windfall sites, and limited infilling. New homes will respect existing residential character and local distinctiveness.
- The area contains a number of conservation areas each with a distinct history and character. Development will respond to the specific characters and identities of these areas in order to preserve and enhance the conservation areas in line with respective conservation area appraisals and management plans.
- Alongside the Town Centre's retail offer and evening economy, the potential for small scale employment will be realised. The established art scene will be strengthened by a dedicated Creative Enterprise Centre. Cross borough working will ensure links to Crystal Palace Park are made, development is planned across the borough boundaries in order to foster a strong sense of place and potential employment

opportunities, including tourism and related visitor accommodation, are captured.

- Opportunities for public realm improvements will primarily focus on the Town Centre.
- Opportunities for new planting will be sought to enhance the character of the wooded hillside, and to consolidate surviving remnants of the Great North Wood.
- Working with neighbouring boroughs, connectivity to Crystal Palace Park, the railway station, and in turn the Triangle, will be improved where possible.
- Improvements will be sought to create an environment more pleasant to walk and cycle through, with better connections and permeability for cyclists and pedestrians alike. The community will enjoy better quality, more frequent and more reliable bus services connecting with Central Croydon. The tram system in Croydon will be further supported by promoting a new branch link to Crystal Palace to improve connectivity and air quality to enhance quality of life for all.

## Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	162		
Number of homes in Crystal Palace and Upper Norwood ( <i>the proposed Place target</i> )	480 to 670	420 to 600	420 to 600
What it looks like spatially			

			
<p><b>Description of the option</b></p>	<p>Much of Crystal Palace and Upper Norwood consists of Conservation Areas where little change will happen. Outside of the Conservation Areas, those areas that are more accessible<sup>36</sup> will see some evolution within the existing character of the area. Elsewhere there will be less change. The council will promote an extension of the tram to Crystal Palace.</p>	<p>There will be relatively little change across the whole of Crystal Palace apart from a small number of development sites set out in the proposed site allocations below. The council will promote an extension of the tram to Crystal Palace.</p>	<p>There will be relatively little change across the whole of Crystal Palace apart from a small number of development sites set out in the proposed site allocations below. The council will promote an extension of the tram to Crystal Palace.</p>

<sup>36</sup> Those areas with a PTAL of 3 or above, or within 800m of a train station or Crystal Palace Town Centre.

### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
28	Bowyers Yard, Bedwardine Road	Cultural and Creative Industries Enterprise Centre	n/a
58	140 & 140a Hermitage Road	Residential development, subject to impact on the heritage of the area	20 to 73
357	Norwood Heights Shopping Centre, Westow Street	Retail, replacement community use and residential	39 to 223
59	Garages at rear of 96 College Green and land at Westow Park, Upper Norwood	Residential development, subject to impact on the heritage of the area	10 to 50

### Possible Local Green Spaces

Within Crystal Palace and Upper Norwood the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Stambourne Woodland Walk	The Friends of Stambourne Woods arrange community events. The Conservation group also regularly put on events for local people - educational, recreational. The Conservation group regularly attend to the Woods to stop it overgrowing, and maintain access for all those who use it. Scouts and Beavers groups also regularly use the space as a valuable teaching resource. Stambourne Woodland Walk recently won an award from the forestry commission as the best community woodland in London
The Lawns	The Friends Group for this woods regularly has work days with both the London Wildlife Trust and The Conservation Volunteers to maintain the space and have worked with school children on occasion. They have litter picking days too.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	The Great North Woods held their annual Festival there this year and the Friends group were heavily involved in its planning.
Westow Park	The Friends of Westow Park organise community workdays here, run free community sports events & helped organise the Crystal Palace Festival here for 3 years. The edible garden is a volunteer community project. Locals meet up on Saturdays to help out and share the produce.

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Beaulieu Heights	Town natural open space
Beulah Hill Pond	Neighbourhood natural open space
Convent Wood	Town natural open space
Upper Norwood Recreation Ground	Town Park

### Help shape the future of the Place of Crystal Palace and Upper Norwood

134. How should Crystal Palace and Upper Norwood change to help meet the need for homes and infrastructure in the borough?
135. What other potential development sites in Crystal Palace and Upper Norwood should the Local Plan review allocate for development?
136. Do you think any proposed sites in Crystal Palace and Upper Norwood should be removed from the Local Plan review? If so, which one(s)? Please explain why.
137. What community facilities in Crystal Palace and Upper Norwood are important to you?
138. What new community facilities are required in Crystal Palace and Upper Norwood?
139. Are there any green spaces in Crystal Palace and Upper Norwood that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
140. Are there any other green areas in Crystal Palace and Upper Norwood (that are not informal green spaces, linear open spaces or Metropolitan Open Land) that should be protected? Please explain why.

# Kenley and Old Coulsdon

## Kenley and Old Coulsdon



- Existing**
- Built Environment
  - Existing Green Grid and connections
  - Metropolitan Green Belt
  - Metropolitan Open Land
  - Non designated green space
  - Locally listed Historic Parks and Gardens
  - Conservation Areas
  - Area of Focused Intensification
  - Croydon Panorama
  - Local Designated View
  - Railway
  - Railway Station
  - Roads
  - Schools (Primary and Secondary)
  - Independent Schools
  - Neighbourhood Centre
  - Scheduled Monument
    - 1: WW1 Fighter Plane
    - 2: Swan cemetery and warburks

- Proposed**
- Proposed Green Grid and connections






## Where we want to be

Kenley and Old Coulsdon will continue to be seen as a suburban area with green wooded hillsides and green open spaces located within and around it. Windfall development, particularly in the Area of Focussed Intensification, will evolve the place's unique character.

## Opportunities, constraints and change up to 2039

- The Kenley Community Plan will set out Kenley's community vision to manage an increase in population, through suggesting new and improved community spaces, public realm, and local retail.
- The two distinct characters of Bradmore Green and Kenley Aerodrome Conservation Areas are focussed around important open spaces, the character and primacy of which will be preserved and enhanced.
- The shopping parade, train station, church, nursery, GP surgery and memorial hall should be supported and improved as necessary to continue to provide important community services.
- New homes will evolve the existing residential character and local distinctiveness through a variety of dwelling types. There will be a revitalisation of local businesses and services along Godstone Road, providing long-term benefit to the community.
- High quality public realm improvements will be focussed along the Godstone Road, around Kenley station and in the Bradmore Green Conservation Area.
- Where possible the Caterham Bourne should be de-culverted to create a more natural environment whilst encouraging biodiversity. Development in the flood zone will be guided by the policies of the Plan to reduce flood risk
- Links to existing green spaces and the extensive Green Grid network of paths from the residential areas will be improved and added to where possible, to provide more opportunities for cycling and walking.
- With its topography of steep hillsides the existing transport arteries are likely to remain, with local bus services, connections and levels of access maintained.
- The council will continue to investigate ways of improving public transport routes in this area of the borough to improve connectivity, air quality and support housing growth.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	100		
Number of homes in Kenley and Old Coulsdon ( <i>the proposed Place target</i> )	2,000 to 2,480	1,380 to 1,710	1,380 to 1,710
What it looks like spatially			



<p><b>Description of the option</b></p>	<p>Growth in Kenley and Old Coulsdon will be in the form of windfall development. Those areas in the north of Kenley and the far north of Old Coulsdon, where homes are typically on larger plots and are in the most accessible locations<sup>37</sup>, will see some focussed intensification, resulting in a gradual change in character to denser forms of development. Elsewhere, areas with homes on larger plots will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. In other parts of Kenley and Old Coulsdon that are accessible<sup>38</sup>, there will be some evolution within the existing character of the area. Elsewhere, including in</p>	<p>Growth in Kenley and Old Coulsdon will be in the form of windfall development. Those areas in the north of Kenley and the far north of Old Coulsdon, where homes are typically on larger plots and are in the most accessible locations<sup>39</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of Kenley and Old Coulsdon, including Conservation Areas, there will be less change. The council will continue to seek to help improve public transport services with</p>	<p>Growth in Kenley and Old Coulsdon will be in the form of windfall development. Those areas in the north of Kenley and the far north of Old Coulsdon, where homes are typically on larger plots and are in the most accessible locations<sup>40</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of Kenley and Old Coulsdon, including Conservation Areas, there will be less change. The council will continue to seek to help improve public transport services with Transport for London in this area of the borough</p>



<sup>37</sup> Locations which have a PTAL of 3 or above or are within 800m of a train station

<sup>38</sup> Ibid

<sup>39</sup> Ibid

<sup>40</sup> Ibid

	Conservation Areas, there will be less change. The council will continue to seek to help improve public transport services with Transport for London in this area of the borough.	Transport for London in this area of the borough	
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### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
937	Kempsfield House, 1 Reedham Park Avenue	Residential development	12

### Possible Local Green Spaces

Within Kenley and Old Coulsdon the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Foxley Wood and Sherwood Oaks	Friends of Foxley enhances and manages Foxley Wood for the benefit of local residents and visitors. It works in partnership with the London Borough of Croydon and in consultation with local groups. It manages the wood on behalf of the council in accordance with a 5 Year Management Plan and the activities include path resurfacing, renewing benches and tables, renewing steps, tree planting, creating specialised habitats, wildlife surveying, keeping the network of paths open, cutting firewood, working with other organisations on specific projects and playing a very active role in cattle and sheep grazing regimes. Over the years the Friends

	<p>of Foxley have organised guided walks, bat walks, corporate work days, and activities for uniformed groups and have held 2 open days. Schools use the site for outings with the children that help deliver the curriculum.</p> <p>Scout events (tracking, stalking, camp skills, bivouacs) also take place on this space.</p>
Higher Drive Recreation Ground	<p>Kenley Explorer Scouts regularly use Higher Drive Recreation ground for their activities. Guide groups use this frequently as a hike activity and for learning about nature, identify birds and plants. Churches Together in Purley &amp; Kenley hold a Sunrise Service here every Easter Sunday.</p>
Roffey Close/Wontford Road Green	<p>Used for parties and special occasions organised by the community</p>

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Bourne Park	Local park and open space
Former Godstone Road allotments	Local park and open space

## Help shape the future of the Place of Kenley and Old Coulsdon

141. How should Kenley and Old Coulsdon change to help meet the need for homes and infrastructure in the borough?
142. What other potential development sites in Kenley and Old Coulsdon should the Local Plan review allocate for development?
143. Do you think the proposed development site in Kenley and Old Coulsdon should be removed from the Local Plan review? If so, please explain why.
144. What community facilities in Kenley and Old Coulsdon are important to you?
145. What new community facilities are required in Kenley and Old Coulsdon?
146. Are there any green spaces in Kenley and Old Coulsdon that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
147. Are there any other green areas in Kenley and Old Coulsdon (that are not informal green spaces, linear open spaces or Green Belt) that should be protected? Please explain why.

# Norbury

## Norbury



- | Existing                                  | Proposed                            |
|---|-------------------------------------|
| Built Environment                         | Proposed Green Grid and connections |
| Existing Green Grid and connections       | Public Realm Improvements           |
| Metropolitan Green Belt                   | Proposed Cycle Hub                  |
| Metropolitan Open Land                    |                                     |
| Non designated green space                |                                     |
| Registered Historic Park and Gardens      |                                     |
| Locally listed Historic Parks and Gardens |                                     |
| Conservation Areas                        |                                     |
| Local Heritage Areas                      |                                     |
| Croydon Panorama                          |                                     |
| Railway                                   |                                     |
| Railway Station                           |                                     |
| Roads                                     |                                     |
| Schools (Primary and Secondary)           |                                     |
| District Centre                           |                                     |
| Neighbourhood Centre                      |                                     |



## Where we want to be

Norbury will continue to serve as a vibrant gateway to the borough, with improved green links to and from the station, and a diverse mix of homes, community and cultural facilities. It is characterised by a unique suburban and urban character, and will benefit from improved access to its local green spaces.




## Opportunities, constraints and change up to 2039

- Sustainable, well-designed windfall development that respects existing character and distinctiveness, whilst providing a Town Centre that reflects the diversity of the place, made up of a mixture of local businesses and community facilities.
- The distinct characters of Norwood Grove and Norbury Estate conservation areas will be preserved and enhanced but there is some opportunity for enhancement through certain buildings in the conservation area or infill in Norwood Grove. The nature of Norbury Estate means there isn't opportunity for new development.
- Improved links to the Registered Historic and Local Historic Parks and Gardens, incorporated into the wider Green Grid.
- Improvements to public realm will be centred around the town and local centres, and of a high quality to ensure that the character of the local area is respected.
- Norbury Brook should be de-culverted where possible to encourage biodiversity and access to nature, whilst

reducing flood risk to areas that would otherwise be suitable for redevelopment.

- Improved cycle facilities to Norbury station, bus links to Central Croydon, and walking/cycling routes to promote sustainable travel.
- The council will work on the feasibility of a rapid transit route/tram extension from Croydon Town Centre to Norbury in discussion with Transport for London to improve connectivity, air quality and housing growth.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	38		
Number of homes in Norbury <i>(the proposed Place target)</i>	540 to 670	360 to 450	360 to 450
What it looks like spatially			



<p><b>Description of the option</b></p>	<p>Most growth in Norbury will be on windfall sites. Outside of Norbury Town Centre and Conservation Areas, those areas that are most accessible<sup>41</sup> will see some evolution within the existing character of the area. Conservation Areas will see little change. Norbury Town Centre will see some moderate intensification with denser development that is in keeping with its character. Areas that are less accessible will see less change. The council will promote an extension of the tram to Norbury.</p>	<p>Most growth in Norbury will be on windfall sites. Apart from in Norbury Town Centre which will see some moderate intensification with denser development that is in keeping with the character, there will be less change in Norbury. The council will promote an extension of the tram to Norbury.</p>	<p>Most growth in Norbury will be on windfall sites. Apart from in Norbury Town Centre which will see some moderate intensification with denser development that is in keeping with the character, there will be less change in Norbury. The council will promote an extension of the tram to Norbury.</p>



<sup>41</sup> Locations with a PTAL of 3 or above or within 800m of Norbury Town Centre or a train station

### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
106	CACFO, 40 Northwood Road	Mixed use residential and community use (to retain equivalent floor space or functionality of the community use)	5 to 20
284	Asharia House, 50 Northwood Road	Residential development including replacement community facility	7 to 23
951	1485-1489 London Road	Redevelopment for residential and retail	15 to 22

### Possible Local Green Spaces

Within Norbury the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further

information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Biggin Wood	<p>Joining walks organised by the London Wildlife Trust as part of their Great North Wood Project are held here. Biggin Wood is one of the remaining parts of the Great North Wood, described as a fragment of a mighty woodland in South London. A group is trying to get an outdoors educational project (Ofsted registered) in a natural environment at Biggin Woods Park to be able to offer children in the local area childcare from the ages 2 to 5.</p> <p>Biggin Wood is used by Cubs, Scouts and brownies as well as a Woodland school. Biggin Wood now has an active 'Friends of Biggin Wood' group which</p>

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	has enhanced many aspects in the Wood.
Norbury Hall	Maintained by a Friends of Norbury Hall Park group, who have also held Family Fun Days.
The Green, Semley Road,	The Green has previously been used as a community space for locals to come together in the spirit of social cohesion to enjoy occasions such as the annual nationwide 'Big Lunch'. In November 2011 Norbury Green Residents Association (NGRA) used a grant from Croydon Council to plant 2000 crocuses on the Green – the community planted the trees themselves. The Green was also used recently as a place for the NGRA to create a poppy display in remembrance of the 100 year anniversary of the end of WW1.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
The Green, Covington Way/Crescent Way	Local residents often meet here to discuss issues in the community. This space hosts the annual community summer party.

#### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

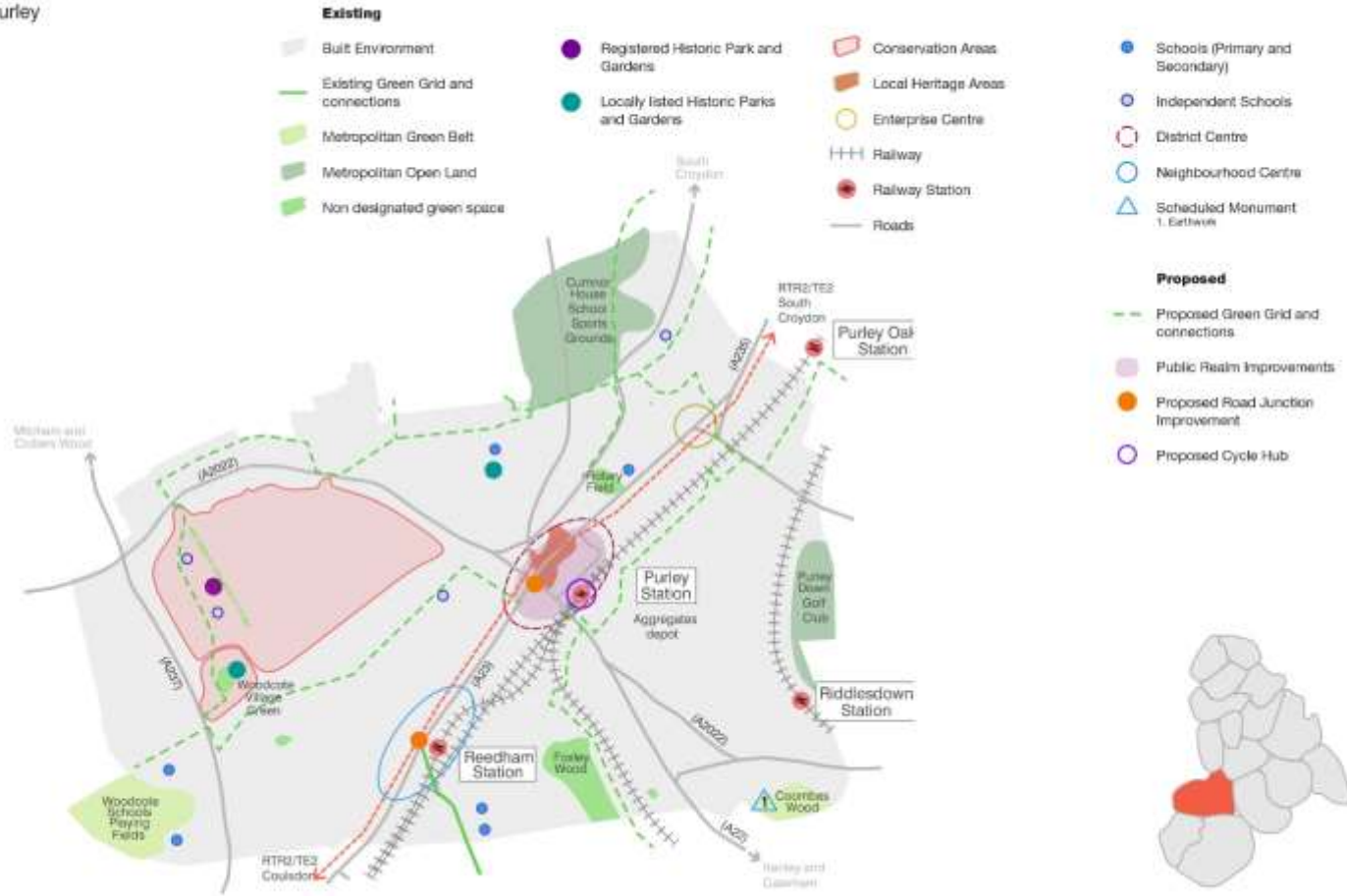
Other green areas to be protected by Local Plan review	Type of other green space
Green Lane Sports Ground	Other open space
Manor Farm nature space	Neighbourhood natural open space
Norbury Park	Town Park
Pollards Hill	Neighbourhood parks and play spaces
Pollards Hill Triangle	Neighbourhood parks and play spaces

### Help shape the future of the Place of Norbury

148. How should Norbury change to help meet the need for homes and infrastructure in the borough?
149. What other potential development sites in Norbury should the Local Plan review allocate for development?
150. Do you think any proposed sites in Norbury should be removed from the Local Plan review? If so, which one(s)? Please explain why.
151. What community facilities in Norbury are important to you?
152. What new community facilities are required in Norbury?
153. Are there any green spaces in Norbury that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
154. Are there any other green areas in Norbury (that are not informal green spaces, linear open spaces or Metropolitan Open Land) that should be protected? Please explain why.

# Purley

## Purley



## Where we want to be

An increasingly vibrant Town Centre with improved public services, physical and social infrastructure, supported by the evolution, and on occasions change, of suburban character.

## Opportunities, constraints and change up to 2039




- A location for major growth focussed on a regenerated Town Centre and the most accessible suburban locations. The Town Centre will retain its historic character with a mixture of homes, community and cultural facilities alongside retail, services and town centre uses. High quality residential development around the Town Centre and close to stations will respect the existing residential character and local distinctiveness under Strategic Options 2 and 3, but will result in a gradual evolution of character under Strategic Option 1.
- New development will respect the existing local character and distinctiveness of Purley, referring to the Borough Character Appraisal to inform design quality, with opportunities for public realm improvements primarily focussing on the District Centre whilst seeking to improve links to open space. Any buildings and conversions should be of a high standard of design to ensure the character of the Centre and the Conservation Area are respected. The landscape-first principles of the Webb Estate and Upper Woodcote Village will be preserved and enhanced. The setting of

Conservation Areas and heritage assets will also need to be preserved and enhanced in all scenarios.

- Enhanced high quality public realm, including sustainable urban drainage systems, with improved accessibility and links to open space. Purley Town Centre needs an attractive focal public space or urban square that presents opportunities for the community to come together and to socialise.
- A vibrant night-time economy with independent shops and restaurants in the Town Centre with community facilities in close proximity, and an improved leisure centre and swimming pool.
- The Registered Historic and Local Historic Parks and Gardens will be retained and new links provided to be incorporated into the Green Grid.
- Flood mitigation and adaptation measures along the Brighton Road and south east towards Kenley. Purley Town Centre and the surrounding area may be suitable for a district heat network.
- Improved links to existing open spaces, along with wayfinding around Purley, and to and from the Town Centre. New bus route measures and improvements, will be developed where possible, along the Brighton Road linking Central Croydon with Purley Town Centre, along with improved cycle and pedestrian routes. Expanded cycle facilities at Purley railway station. Improve the environment for pedestrians in Purley Town Centre making it easier to move about centre. This includes improved connectivity and active frontages.

- The Purley Cross gyratory acts as a barrier in the centre of Purley as well as taking up land. Its reconfiguration could present new opportunities for Purley Town Centre.
- The council will work on the feasibility of a rapid transit route/tram extension from Croydon Town Centre to Purley (via Brighton Road) and Coulsdon in discussion with Transport for London to improve connectivity, air quality and housing growth.
- The Council will work to develop future masterplan for Purley to help guide high quality sustainable growth and development of the area. This will include parameters and guidance for higher density developments and appropriate locations for this.

## Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	210		
Number of homes in Purley <i>(the proposed Place target)</i>	7,260 to 9,390	5,400 to 7,060	5,400 to 7,060
What it looks like spatially			





**Description of the option**

Three-quarters of growth in Purley will be on windfall sites. Purley’s Conservation Areas will see little change. Further, the setting of Conservation Areas and Heritage Assets will need to be preserved and enhanced in all scenarios. Elsewhere there will be significant growth in much of Purley. The Town Centre has a number of site allocations where high density development can be expected. Those areas of Purley within 800m of the Town Centre (or a train station) will either see evolution of their existing character, or, in areas where homes are typically on larger plots of land, more focussed intensification which will see a gradual change of character to higher density forms of development. Elsewhere, in areas

About two-third’s of growth in Purley will be on windfall sites. Purley’s Conservation Areas will see little change. Elsewhere there will be growth in more accessible areas of Purley<sup>42</sup>. The Town Centre has a number of site allocations where high density development can be expected. In areas where homes are typically on larger plots of land, and that are more accessible<sup>43</sup>, there will be moderate intensification resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other areas of Purley there will be less change. The council will promote extensions of the tram

About two-third’s of growth in Purley will be on windfall sites. Purley’s Conservation Areas will see little change. Elsewhere there will be growth in more accessible areas of Purley<sup>44</sup>. The Town Centre has a number of site allocations where high density development can be expected. In areas where homes are typically on larger plots of land, and that are more accessible<sup>45</sup>, there will be moderate intensification resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other areas of Purley there will be less change. The council will promote extensions of the tram along the

<sup>42</sup> Those areas within 800m of Purley Town Centre or a train station  
<sup>43</sup> Ibid  
<sup>44</sup> Ibid  
<sup>45</sup> Ibid

	where homes are typically on larger plots of land, there will be moderate intensification resulting in a denser form of development that still relates to the existing character of the area. The council will promote extensions of the tram along the Purley Way towards Waddon, north from Purley Town Centre along the Brighton Road towards South Croydon/Central Croydon, and south from Purley Town Centre towards Coulsdon.	along the Purley Way towards Waddon, north from Purley Town Centre along the Brighton Road towards South Croydon/Central Croydon, and south from Purley Town Centre towards Coulsdon.	Purley Way towards Waddon, north from Purley Town Centre along the Brighton Road towards South Croydon/Central Croydon, and south from Purley Town Centre towards Coulsdon.
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### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
30	Purley Leisure Centre, car park and former Sainsbury's Supermarket, High Street	Mixed use redevelopment incorporating public car park, new leisure facilities, including a swimming pool, and other community facilities, healthcare	30 to 171

Site ref	Name of site	Proposed use	Number of homes (if applicable)
		facility, creative and cultural industries enterprise centre, retail or residential accommodation.	
35	Purley Baptist Church, 2-12 Banstead Road	Mixed use redevelopment comprising new church, community facility and residential	20 to 111
61	Car park, 54-58 Whytecliffe Road South	Residential use with retention of car parking spaces	21 to 119

Site ref	Name of site	Proposed use	Number of homes (if applicable)
64	112a and 112b Brighton Road	Residential, with leisure uses (up to existing floor space)	14 to 52
130	1-9 Banstead Road	Residential	77 to 100
324	Purley Oaks Depot, 505-600 Brighton Road	20 Gypsy and traveller pitches	47 to 175
325	Telephone Exchange, 88-90 Brighton Road	Conversion of existing building to residential use if no longer required as a telephone exchange in the future	19 to 77
347	Tesco, 2 Purley Road	Mixed use residential, healthcare facility (if required by the NHS) and retail development	172 to 990
405	Capella Court & Royal Oak Centre, 725 Brighton Road	Residential development and health facility, and the retention and reconfiguration of existing uses and their floor space with no net loss of flood storage capacity	64

Site ref	Name of site	Proposed use	Number of homes (if applicable)
410	100 Brighton Road	Mixed use residential and retail development	10 to 37
411	Palmerston House, 814 Brighton Road	Residential redevelopment	4 to 18
490	95-111 Brighton Road and 1-5, 9-15 and 19 Old Lodge Lane	Primary school (on up to 0.4ha of the site) and residential development, to be brought forward in one phase, and limited retail / food and drink (up to existing floor space)	35 to 130
495	Dairy Crest dairy, 823-825 Brighton Road	Conversion of buildings fronting Brighton Road to studio space (with potential for a Creative and Cultural Industries Enterprise Centre serving Purley) with new light industrial units to the rear	n/a
683	Purley Back Lanes, 16-28	Residential development and public car park	Up to 91

Site ref	Name of site	Proposed use	Number of homes (if applicable)
	Pampisford Road	including new industrial units to replace those currently on the site	

### Possible Local Green Spaces

Within Purley the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Foxley Wood and Sherwood Oaks	Friends of Foxley enhances and manages Foxley Wood for the benefit of local residents and visitors. It works in partnership with the London Borough of Croydon and in consultation with local groups. It manages the wood on behalf of the council in accordance with a 5 Year Management Plan and the activities include path resurfacing, renewing benches and tables, renewing steps, tree planting, creating specialised habitats, wildlife surveying, keeping the

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	<p>network of paths open, cutting firewood, working with other organisations on specific projects and playing a very active role in cattle and sheep grazing regimes. Over the years the Friends of Foxley have organised guided walks, bat walks, corporate work days, and activities for uniformed groups and have held 2 open days.</p> <p>Schools use the site for outings with the children that help deliver the curriculum.</p> <p>Scout events (tracking, stalking, camp skills, bivouacs) also take place on this space.</p>
Rotary Field Recreation Ground	The field was a gift to the people of Purley. It is used for many community events including funfairs and circuses, the Purley Festival, annual vintage car show

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	arranged by the local Rotary Club, open air cinemas. Used by Christ Church CoE Primary School for their events and to teach children about nature.
Woodcote Village Green	The Village Green is a War memorial and hosts the annual Remembrance day service.

#### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Allder Way Playground	Neighbourhood parks and play spaces
Copse Hill Spinney	Neighbourhood natural open space

Other green areas to be protected by Local Plan review	Type of other green space
Lower Barn Road Green	Neighbourhood parks and play spaces
Roke Play Space	Neighbourhood parks and play spaces

#### Help shape the future of the Place of Purley

155. How should Purley change to help meet the need for homes and infrastructure in the borough?
156. What other potential development sites in Purley should the Local Plan review allocate for development?
157. Do you think any proposed sites in Purley should be removed from the Local Plan review? If so, which one(s)? Please explain why.
158. What community facilities in Purley are important to you?
159. What new community facilities are required in Purley?
160. Are there any green spaces in Purley that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
161. Are there any other green areas in Purley (that are not informal green spaces, linear open spaces, Metropolitan Open Land or Green Belt) that should be protected? Please explain why.

# Sanderstead

## Sanderstead



- | Existing  | Proposed                            |
|---|-------------------------------------|
| Built Environment                                       | Proposed Green Grid and connections |
| Existing Green Grid and connections                     | Public Realm Improvements           |
| Metropolitan Green Belt                                 |                                     |
| Metropolitan Open Land                                  |                                     |
| Non designated green space                              |                                     |
| Locally listed Historic Parks and Gardens               |                                     |
| Local Designated View                                   |                                     |
| Croydon Panorama  |                                     |
| Railway   |                                     |
| Railway Station   |                                     |
| Roads   |                                     |
| Schools (Primary and Secondary)                         |                                     |
| District Centre   |                                     |
| Neighbourhood Centre                                    |                                     |
| Local Landmarks (Numbered)<br>1. All Saints' Churchyard |                                     |



## Where we want to be

Sanderstead will continue to be a predominantly 1930s suburb, with a character focussed on the pond and church, surrounded by substantial green space with improved cycle and pedestrian links, served by the Sanderstead and Hamsey Green Local Centres. Most growth will be focussed in the north of the Place in those locations nearest to Sanderstead station.

## Opportunities, constraints and change up to 2039

- An area of sustainable growth of the suburbs with some opportunity for windfall sites, growth will mainly be of infilling with dispersed integration of new homes that respect existing residential character and local distinctiveness. In the north of Sanderstead, in areas closest to Sanderstead station, there is potential for more intense development where homes are located on larger plots of land.
- There is potential for an urban extension on land in Green Belt off Mitchley Hill and Borrowdale Drive.
- Employment opportunities will be concentrated in the two Local Centres with predominantly independent shops supporting the local community.
- Any opportunities for public realm improvements will focus on the two Local Centres of Sanderstead and Hamsey Green.
- As a key link in the east part of the Green Grid network of the borough, links to existing green spaces from the residential areas will be improved with further


connections added where possible.

Local residents will enjoy better quality, more frequent and reliable bus services connecting with Central Croydon. Travel plans will look to ease congestion at peak times in the Local Centre by encouraging walking, cycling or public transport especially for school journeys.

- Any buildings and conversions should be of a high standard of design to ensure the characters of the Centres are respected.
- The council will work on the feasibility of a rapid transit route/tram extension from Croydon Town Centre to Sanderstead station and Sanderstead, in discussion with Transport for London, to improve connectivity, air quality and housing growth.



Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	30		
Number of homes in Sanderstead (the proposed Place target)	1,670 to 2,070	1,170 to 1,450	1,170 to 1,450 <i>(plus 680 to 780 new homes on an urban extension on Green Belt land at Borrowdale Drive/Mitchley Hill)</i>
What it looks like spatially			



**Description of the option**

Most development in Sanderstead will be on windfall sites. Some areas in the north of Sanderstead, where homes are typically on larger plots and are in the most accessible locations<sup>46</sup>, will see some focussed intensification, resulting in a gradual change in character to denser forms of development. Elsewhere, areas with homes on larger plots will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Within Conservation Areas there will be little change. In other parts of Sanderstead there will be some evolution within the existing character of the area. The council will seek a tram extension from Central Croydon to Sanderstead station & Sanderstead.

Most development in Sanderstead will be on windfall sites. Some areas in the north of Sanderstead, where homes are typically on larger plots and are in the most accessible locations<sup>47</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of Sanderstead, including Conservation Areas, there will be less change. The council will seek a tram extension from Central Croydon to Sanderstead station & Sanderstead.

Pressure will be taken away from existing residential areas because of limited release of Green Belt land for development at Borrowdale Drive/Mitchley Hill. However, some areas in the north of Sanderstead, where homes are typically on larger plots and are in the most accessible locations<sup>48</sup>, will still see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of Sanderstead, including Conservation Areas, there will be less change. The council will seek a tram extension from Central Croydon to Sanderstead station & Sanderstead.

<sup>46</sup> Locations which have a PTAL of 3 or above or are within 800m of a train station  
<sup>47</sup> Ibid  
<sup>48</sup> Ibid

## Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
70	Sanderstead Recreation Ground, Limpsfield Road	Expansion of Gresham Primary School	n/a
71	2 Red Gables Beech Avenue	Residential development	23 to 47
79	Waitrose	Mixed use residential and retail development, subject to impact on designated views	26 to 54
306	The Good Companions Public House site, 251 Tithe Pit Shaw Lane	Mixed use of residential and retail	8 to 24

## Possible Local Green Spaces

Within Sanderstead the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Green outside post office, Elmfield Way	The park has been used to host local events such as tea parties.
Purley Beeches	8th Purley Scouts have their colony base very near the Beeches (at St Mary's) and use the Beeches for various activities, from woodcraft to orienteering, summer picnics, water play and many more. It is a nice large space that can accommodate groups of beavers, cubs and scouts

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	without infringing on other local activities.
Sanderstead Pond (and Green)	The local scout group, 16th Purley, the beavers, cubs and scouts all use the Gruffy weekly for activities. They also run the annual Gruffy Fayre which is seen locally as the 'village fair'.. This fayre has been running for nearly 50 years.
Wettern Tree Garden	The Wettern Tree Garden has a unique collection of trees and shrubs.bequeathed to Croydon by Mr Wettern. It is a local space used for community events as well as the annual Sanderstead Horticultural Summer Show. It has also been used for outdoor theatre productions by the Sanderstead Drama Club. Local Brownies group use Wettern Green Gardens to do activities and walks. Beavers and Scouts have always utilised this space for

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	educational purposes and fun hide and seek.

**Other green areas to be protected by the Local Plan review**

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

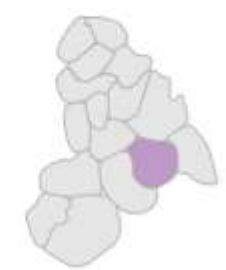
Other green areas to be protected by Local Plan review	Type of other green space
All Saints Churchyard, Sanderstead	Cemetery or church yard
All Saints Graveyard, Sanderstead	Cemetery or church yard

### Help shape the future of the Place of Sanderstead

162. How should Sanderstead change to help meet the need for homes and infrastructure in the borough?
163. What other potential development sites in Sanderstead should the Local Plan review allocate for development?
164. Do you think any proposed sites in Sanderstead should be removed from the Local Plan review? If so, which one(s)? Please explain why.
165. What community facilities in Sanderstead are important to you?
166. What new community facilities are required in Sanderstead?
167. Are there any green spaces in Sanderstead that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
168. Are there any other green areas in Sanderstead (that are not informal green spaces, linear open spaces, Metropolitan Open Land or Green Belt) that should be protected? Please explain why.

# Selsdon

## Selsdon



## Where we want to be

Selsdon Town Centre will continue to provide a range of services for the residential population in a suburban setting with good links to its green open spaces and countryside. Selsdon Park Road/Featherbed Lane Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function.




## Opportunities, constraints and change up to 2039

- An area of sustainable growth of the suburbs with some opportunity for windfall sites, growth will mainly be of infilling with new homes that respect existing residential character and local distinctiveness.
- Selsdon Town Centre will continue to be the main focus for employment, with the adjacent Selsdon Park Hotel also providing local job opportunities. Community facilities will be focused on the Town Centre, where public realm improvements will be located.
- Links to existing green spaces from the residential areas will be improved where possible with additional connections to strategic green links enabling more opportunities for walking and cycling in the area.
- With a tram stop to the north edge of Selsdon, local bus services, connections and access will be maintained, but with improved walking and cycling routes where possible, via improvements to the Green Grid. The community will enjoy better quality, more frequent and reliable bus services connecting with Central Croydon. Travel plans will look to ease congestion at peak times in the Town Centre by

encouraging walking, cycling or public transport especially for school journeys.

- The council will work on the feasibility of a rapid transit route/tram extension from Croydon Town Centre to Selsdon in discussion with Transport for London to improve connectivity, air quality and housing growth.

## Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	40		
Number of homes in Selsdon ( <i>the proposed Place target</i> )	870 to 1,070	580 to 710	580 to 710 <i>(plus 1,300 to 1,540 new homes on an urban extension on Green Belt land at Gravel Hill)</i>
What it looks like spatially			



<p><b>Description of the option</b></p>	<p>Most development in Selsdon will be on windfall sites. Those areas within 800m of Selsdon Town Centre or a tram stop will see some evolution of their existing character (apart from in Conservation Areas, which will see little change). Elsewhere there will be less change. The council will investigate the feasibility of a rapid transit route/tram extension with Transport for London to support housing growth, as well as improve connectivity and air quality to improve quality of life for all.</p>	<p>Most development in Selsdon will be on windfall sites. There will be less change to the existing character of Selsdon. The council will investigate the feasibility of a rapid transit route/tram extension with Transport for London to support housing growth, as well as improve connectivity and air quality to improve quality of life for all.</p>	<p>There will be less change to the existing character of Selsdon. This is because some pressure is taken away from existing residential areas because of limited release of Green Belt land for development, including an urban extension at Gravel Hill. The council will investigate the feasibility of a rapid transit route/tram extension with Transport for London to support housing growth, as well as improve connectivity and air quality to improve quality of life for all.</p>

### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
85	The Forestdale Centre	Residential development incorporating a new shopping parade with retail, finance, and food & drink	16 to 41

### Possible Local Green Spaces

Within Selsdon the following green space has been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Freelands Avenue on junction with Tedder Road	This green land is used for communities to have fun days on. Fetes are held here by Monks Hill Residents Association. The last fete was on Saturday 1st June 2019 when the Mayor and Mayoress of Croydon attended.
Palace Green	The grassed area in the centre of Palace Green is used as a community space for annual community barbecue.

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
--	---------------------------

Ashen Grove	Local natural open space
Selsdon Recreation Ground	Town Park
The Ruffet	Local natural open space

### Help shape the future of the Place of Selsdon

169. How should Selsdon change to help meet the need for homes and infrastructure in the borough?
170. What other potential development sites in Selsdon should the Local Plan review allocate for development?
171. Do you think the proposed development site in Selsdon should be removed from the Local Plan review? If so, please explain why.
172. What community facilities in Selsdon are important to you?
173. What new community facilities are required in Selsdon?
174. Are there any green spaces in Selsdon that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
175. Are there any other green areas in Selsdon (that are not informal green spaces, linear open spaces, Metropolitan Open Land or Green Belt) that should be protected? Please explain why.

# Shirley

## Shirley



- | Existing  | Proposed                            |
|---|-------------------------------------|
| Built Environment   | Proposed Green Grid and connections |
| Existing Green Grid and connections                                     | Public Realm Improvements           |
| Metropolitan Green Belt   |                                     |
| Metropolitan Open Land  |                                     |
| Non-designated green space  |                                     |
| Registered Historic Park and Gardens                                    |                                     |
| Locally listed Historic Parks and Gardens                               |                                     |
| Local Heritage Areas  |                                     |
| Area of Focussed Intensification  |                                     |
| Croydon Panoramas   |                                     |
| Tramway   |                                     |
| Roads   |                                     |
| Schools (Primary and Secondary)   |                                     |
| Independent Schools   |                                     |
| District Centres  |                                     |
| Neighbourhood Centre  |                                     |
| Local Landmarks (Numbered)<br>1. Shirley Woodall<br>2. Addington Palace |                                     |






## Where we want to be

Shirley will continue to be a suburb surrounded by substantial green space with improved cycle and pedestrian links. The vibrant Local Centre, with a range of retailing and independent shops will continue to serve the local community. A mature and rejuvenated Shrublands will be served by both local shops as well as those on Wickham Road. Shirley Road and Spring Park/ Bridle Road Neighbourhood Centres will support the existing and future community with services and facilities beyond a retail function.

## Opportunities, constraints and change up to 2039

- An area of sustainable growth of the suburbs, growth will mainly be of infilling with new homes that respect existing residential character and development on specific allocated sites.
  - Some small scale employment will be provided in the Local Centre with predominantly independent shops supporting the local community.
  - New development will be sensitive to the existing residential character and the wooded hillsides of the Place referring to the Borough Character Appraisal to inform design quality. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to ensure the character of the Centre is respected.
  - Development in the flood zones will be guided by the policies of the Plan to reduce flood risk.
- Shirley will continue to be well served by open space with improved connections to the Green Grid, along with way finding, enabling increased walking and cycling.
  - With improved access and links where possible, the existing connectivity and good public transport of Shirley will be maintained.
  - The council will work on the feasibility of a rapid transit route/tram extension from Central Croydon to West Wickham/Hayes in discussion with Transport for London, to improve connectivity, air quality and housing growth.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 3 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	18		
Number of homes in Shirley (the proposed Place target)	360 to 460	360 to 450	360 to 450
What it looks like spatially			

<b>Description of the option</b>	There will be less change in Shirley across all strategic options, beyond a small area of focussed intensification around Shirley Local Centre. In the area of focussed intensification around Shirley Local Centre there will be a gradual change in character to denser forms of development. About a third of development will be on windfall sites.		

### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
87	Shirley Community Centre	Mixed use development with residential and replacement community facility that provides at least equivalent functionality to the existing centre	20 to 25
89	Amenity land on Fir Tree Gardens	Residential	15 to 20

Site ref	Name of site	Proposed use	Number of homes (if applicable)
90	Car park of The Sandrock public house	Residential	Up to 25
128	Land at, Poppy Lane	Residential development	51 to 107
504	Stroud Green Pumping Station, 140 Primrose Lane	Residential development (including the conversion of the Locally Listed pumping station) if the site is no longer required for its current use in the future	26 to 68



### Possible Local Green Spaces

Within Shirley the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Millers Pond	Friends of Miller's Pond use, maintain and enhance Millers. They have raised money through crowdfunding to enhance the park with a new path close to the pond. They have organised and held Millers Pond Fun Day for the benefit of many local organisations such as Girl Guides, Brownies, Townswomens Guilds, who advertise their groups in the local Spring Park Activity News magazine. They have raised money from these Fayres to buy bird/bat boxes

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	and bug hotels for insects to encourage bio-diversity.
Playing field and wood Shirley Oaks	This space is used for local events and fayres. It is a community hub and an area that the whole village uses as a focal point.
Shirley Recreation Ground	Local Cub/Beaver groups use this park. hosts local places of interest - home of Flower Fairies. The Conservation Volunteers, TCV, are based here. It attracts people from all over the country to learning special skills required for conservation work in natural environments.
Spring Park Wood	The Friends of Spring Park Woods have kept paths open, planted many trees and created hedgerows for nesting birds, put up bird boxes and bat boxes. Recreated the bluebell sights which were overgrown. Monitored any garden waste, The woods are used to play 'wide games' with

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	<p>local scout group. Local Brownie group uses wood on different occasions throughout the year to make observations about the changing of the seasons, the wildlife and to appreciate the vast variety of fauna and flora in the woodland. It has also used the pond for pond dipping activities and the grassland to play rounders in the Summer. They have done scavenger hunts, treasure trails, bark rubbings, leaf identification, mini beast hunts, natural collages, wild flower spotting, bird spotting and orienteering activities in this woodland</p>
Temple Avenue Copse	A volunteer group helps to keep the copse clear and tidy for the benefit of all.

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

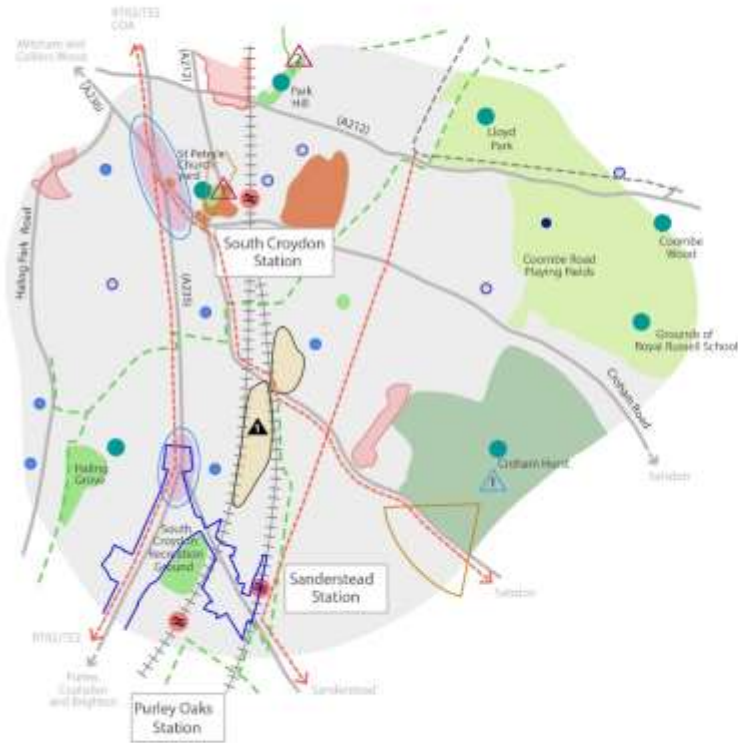
Other green areas to be protected by Local Plan review	Type of other green space
Glade Wood	Local natural open space
Balancing Pond and Land to rear of Honeysuckle Gardens	Neighbourhood parks and play spaces
Parkfields Recreation Ground	Town Park
St John's Church	Cemetery or church yard

### Help shape the future of the Place of Shirley

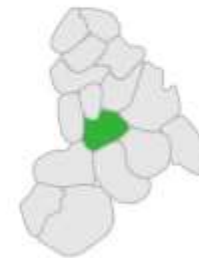
176. How should Shirley change to help meet the need for homes and infrastructure in the borough?
177. What other potential development sites in Shirley should the Local Plan review allocate for development?
178. Do you think any proposed sites in Shirley should be removed from the Local Plan review? If so, which one(s)? Please explain why.
179. What community facilities in Shirley are important to you?
180. What new community facilities are required in Shirley?
181. Are there any green spaces in Shirley that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
182. Are there any other green areas in Shirley (that are not informal green spaces, linear open spaces, Metropolitan Open Land or Green Belt) that should be protected? Please explain why.

# South Croydon

## South Croydon



- |  |  |
|--|--|
| <b>Existing</b>                            | <b>Proposed</b>  |
| Built Environment                          | Local Landmarks (Numbered)<br>1. St Peter's Church<br>2. Park Hill Water Tower |
| Existing Green Grid and connections        | <b>Proposed</b>  |
| Metropolitan Green Belt                    | Proposed Green Grid and connections  |
| Metropolitan Open Land                     | Public Realm Improvements  |
| Non designated green space                 | Potential Primary School Site  |
| Locally listed Historic Parks and Gardens  |  |
| Conservation Areas                         |  |
| Local Heritage Areas                       |  |
| Area of Focussed Intensification           |  |
| Local Designated View                      |  |
| Croydon Panorama                           |  |
| Industrial Area                            |  |
| Tier 1 Strategic Industrial Location       |  |
| Railway                                    |  |
| Tramway                                    |  |
| Railway Station                            |  |
| Roads                                      |  |
| Schools (Primary and Secondary)            |  |
| Independent Schools                        |  |
| Neighbourhood Centre                       |  |
| Scheduled Monument<br>1. St Peter's Church |  |



## Where we want to be

South Croydon will continue to be a highly accessible Place with good connections to open space providing an introduction to the suburban south. The character of the area will be improved through support for the wide range of independent shops and restaurants along South End and its two Local Centres. South End/Parker Road/St Peter's Church Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function.

## Opportunities, constraints and change up to 2039




- The main focus for sustainable growth of the suburbs will be in the Brighton Road area with a mix of windfall and infill development that respects the existing residential character and local distinctiveness and includes flood mitigation measures.
- Croham Manor Road conservation area comprises a unified group of high quality 1920s-1930s suburban housing, set in a mature landscape. The spacious setting and high quality architecture of the group will be preserved and enhanced.
- Selsdon Road (including Carlton Road), will remain an important Separated Industrial Location<sup>49</sup> for the borough and will continue to be protected. Elsewhere

employment will be concentrated in the two Local Centres and along the Brighton Road.

- Through enabling development, potential exists to implement flood mitigation and adaptation measures along the Brighton Road.
- Improved connections to the Green Grid will be sought to increase opportunities for walking and cycling in the area, along with improved walking and cycling facilities along the Brighton Road
- The existing connectivity and good public transport of South Croydon will be maintained and enhanced where possible, with the quality, capacity and reliability of bus services improved. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys. The potential of Selsdon Road Industrial Location to act as a railhead to transfer freight to rail will be supported.
- The council will work on the feasibility of a rapid transit route/tram extension from Central Croydon to Purley along the Brighton Road through South Croydon and also to Sanderstead and Selsdon, in discussion with Transport for London, to improve connectivity, air quality and housing growth.

<sup>49</sup> Separated Industrial Locations are some of Croydon's most important industrial areas. There should be strong protection for industrial and warehousing uses in Separated Industrial Locations.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	819		
Number of homes in South Croydon ( <i>the proposed Place target</i> )	890 to 1,070	680 to 810	680 to 810
What it looks like spatially			



**Description of the option**

About three-quarters of growth will be on windfall sites. Some areas in the east of South Croydon, where homes are typically on larger plots and are in the most accessible locations<sup>50</sup>, will see some focussed intensification, resulting in a gradual change in character to denser forms of development. Focussed intensification will also take place along the Brighton Road south of the Brighton Road (Sanderstead Road) Local Centre. Elsewhere, areas with homes on larger plots will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Within Conservation Areas there will be little change. In other parts of South Croydon there will be some evolution within the existing character of the area in the

About two-thirds of growth will be on windfall sites. Focussed intensification will also take place along the Brighton Road south of the Brighton Road (Sanderstead Road) Local Centre, resulting in a gradual change in character to denser forms of development. Some areas in the east of South Croydon, where homes are typically on larger plots and are in the most accessible locations<sup>52</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of South Croydon, including Conservation Areas, there will be less change. The council will seek tram extensions

About two-thirds of growth will be on windfall sites. Focussed intensification will also take place along the Brighton Road south of the Brighton Road (Sanderstead Road) Local Centre, resulting in a gradual change in character to denser forms of development. Some areas in the east of South Croydon, where homes are typically on larger plots and are in the most accessible locations<sup>53</sup>, will see some moderate intensification, resulting in a denser form of development that still relates to the existing character of the area. Elsewhere, areas with homes on larger plots will see some evolution within the existing character of the area. In other parts of South Croydon, including Conservation Areas, there will be less change. The council will seek tram

<sup>50</sup> Locations which have a PTAL of 3 or above or are within 800m of a train station or tram stop

<sup>52</sup> Ibid

<sup>53</sup> Ibid

	most accessible locations <sup>51</sup> , and less change elsewhere. The council will seek tram extensions along the Brighton Road from Central Croydon to Purley, and from Sandilands to Sanderstead and Selsdon, both passing through South Croydon.	along the Brighton Road from Central Croydon to Purley, and from Sandilands to Sanderstead and Selsdon, both passing through South Croydon.	extensions along the Brighton Road from Central Croydon to Purley, and from Sandilands to Sanderstead and Selsdon, both passing through South Croydon.
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### Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
101	Toby Carvery, Brantwood Road	Residential development	13 to 35
114	Garage courts at 18 Bramley Hill	Residential	20 to 50

### Possible Local Green Spaces

Within South Croydon the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and

every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Haling Grove	The Eleanor Shorter Fund and Friends of Haling Grove have made investments in this space. Friends of Haling Grove organise events such as Dog Shows, Halloween, St Nicholas Eve and Christmas events.

<sup>51</sup> Locations which have a PTAL of 3 or above or are within 800m of a train station or tram stop



Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
St Peters Churchyard	St Peter's holds events in the Churchyard every year including a garden fete in June open to all, and often attended by the local Kickboxing Club who give demonstrations at the summer fayre. It is also used for afternoon teas. The church recently held `A big Lunch` event on 1 June for the local community in the churchyard on the lower lawn near the Heathfield entrance.

#### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Normanton Meadow	Neighbourhood parks and play spaces
South Croydon Recreation Ground	Town Park

#### Help shape the future of the Place of South Croydon

183. How should South Croydon change to help meet the need for homes and infrastructure in the borough?
184. What other potential development sites in South Croydon should the Local Plan review allocate for development?
185. Do you think any proposed sites in South Croydon should be removed from the Local Plan review? If so, which one(s)? Please explain why.
186. What community facilities in South Croydon are important to you?
187. What new community facilities are required in South Croydon?
188. Are there any green spaces in South Croydon that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
189. Are there any other green areas in South Croydon (that are not informal green spaces, linear open spaces or Green Belt) that should be protected? Please explain why.

# South Norwood and Woodside

## South Norwood and Woodside



- | Existing   | Proposed                            |
|--|-------------------------------------|
| Built Environment  | Proposed Green Grid and connections |
| Existing Green Grid and connections  | Public Realm Improvements           |
| Metropolitan Green Belt  | Proposed Road Junction Improvement  |
| Metropolitan Open Land   | Proposed Cycle Hub                  |
| Non designated green space   | Potential Primary School Site       |
| Locally listed Historic Parks and Gardens  |                                     |
| Conservation Areas   |                                     |
| Local Heritage Areas   |                                     |
| Water  |                                     |
| Local Designated View  |                                     |
| Railway  |                                     |
| Tramway  |                                     |
| Railway Station  |                                     |
| Roads  |                                     |
| Schools (Primary and Secondary)  |                                     |
| District Centre  |                                     |
| Neighbourhood Centre   |                                     |
| Enterprise Centre  |                                     |
| Scheduled Monument<br>1, Listed Site   |                                     |
| Local Landmarks (Numbered)<br>1, Clock Tower<br>2, Selhurst Park, Crystal Palace Football Club |                                     |



## Where we want to be

South Norwood and Woodside will be a revitalised residential neighbourhood, benefiting from train services to Docklands, the City, and a good connection to Croydon Town Centre. The Town Centre will be subject to heritage-let enhancement and revival, and will offer a mixture of homes, community and cultural facilities and a range of retailing, including many independent shops.

## Opportunities, constraints and change up to 2039


- An area of sustainable growth of the suburbs with some opportunity for windfall sites, growth will mainly be of infilling with new homes that respect existing residential character, heritage and local distinctiveness.
- Woodside Green and Portland Road (Watcombe Road/Woodside Avenue) Neighbourhood Centres will be supporting the existing and future community with services and facilities beyond a retail function. Community facilities will be encouraged to locate in close proximity to the Town Centre and opportunities to provide workspaces, which could be creative industry based, will be sought in the vicinity of Portland Road.
- Opportunities for public realm improvements will be primarily focussed on the South Norwood Town Centre and Norwood Junction in line with the improvements outlined in the published Community Plan and will respond to the character and significance of this conservation area.
- The Place's diverse open spaces include South Norwood Lake and Country Park. Links will be

provided, where possible, to Central Croydon and Waterlink Way as part of the National Cycle Network. New Green Grid links will improve connectivity wherever possible, whilst improving access to nature and support increased biodiversity.

- The tram system in Croydon will be further supported by promoting new branch links to Crystal Palace and Bromley through South Norwood and Woodside. Measures to provide better quality, more frequent and reliable bus services.
- The council will work on the feasibility of a rapid transit route/tram extension from Central Croydon to Crystal Palace via South Norwood in discussion with Transport for London to improve connectivity, air quality and housing growth.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	95		
Number of homes in South Norwood and Woodside ( <i>the proposed Place target</i> )	460 to 520	350 to 380	350 to 380

What it looks like spatially			
Description of the option	<p>All development in South Norwood and Woodside will be on windfall sites. Outside of Conservation Areas, there will be some evolution within the existing character of the area. There will be little change within Conservation Areas. The council will work on the feasibility of a rapid transit route/tram extension from Central Croydon to Crystal Palace via South Norwood Town Centre in discussion with Transport for London to improve connectivity, air quality and housing growth.</p>	<p>All development in South Norwood and Woodside will be on windfall sites. There will be less change in South Norwood and Woodside. The council will work on the feasibility of a rapid transit route/tram extension from Central Croydon to Crystal Palace via South Norwood Town Centre in discussion with Transport for London to improve connectivity, air quality and housing growth.</p>	<p>All development in South Norwood and Woodside will be on windfall sites. There will be less change in South Norwood and Woodside. The council will work on the feasibility of a rapid transit route/tram extension from Central Croydon to Crystal Palace via South Norwood Town Centre in discussion with Transport for London to improve connectivity, air quality and housing growth.</p>

### Possible Local Green Spaces

Within South Norwood and Woodside the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Heavers Farm Meadow and allotments	The Friends of Heavers Farm maintain this space. A path has been built, some parts tidied up and rubbish cleared.
Portland Road Community Garden	The space is maintained & managed by local community group, People for Portland Road. They have managed the space to be a mini wood with additional trees, wild-flower planting & seating with a stage & is regularly used by a variety of people in the community.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
South Norwood Recreation Ground	Hosts South Norwood Community Festival every year.
Woodside Green	Woodside's war memorial is at one end of the triangular shaped space. It was erected after the first world war. An annual memorial service is held there every year on remembrance Sunday.

### Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green areas to be protected by Local Plan review	Type of other green space
Apsley Road Playground	Neighbourhood parks and play spaces
Brickfields Meadow	Town Park

## Help shape the future of the Place of South Norwood and Woodside

190. How should South Norwood and Woodside change to help meet the need for homes and infrastructure in the borough?
191. What other potential development sites in South Norwood and Woodside should the Local Plan review allocate for development?
192. What community facilities in South Norwood and Woodside are important to you?
193. What new community facilities are required in South Norwood and Woodside?
194. Are there any green spaces in South Norwood and Woodside that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
195. Are there any other green areas in South Norwood and Woodside (that are not informal green spaces, linear open spaces or Metropolitan Open Land) that should be protected? Please explain why.

# Thornton Heath

## Thornton Heath



- | Existing                                     | Proposed                            |
|--|-------------------------------------|
| Built Environment                            | Proposed Green Grid and connections |
| Existing Green Grid and connections          | Public Realm Improvements           |
| Metropolitan Green Belt                      | Proposed Road Junction Improvement  |
| Metropolitan Open Land                       | Proposed Cycle Hub                  |
| Non designated green space                   | Potential Primary School Site       |
| Locally listed Historic Parks and Gardens    |                                     |
| Local Heritage Areas                         |                                     |
| Local Designated View                        |                                     |
| Croydon Panorama                             |                                     |
| Railway                                      |                                     |
| Railway Station                              |                                     |
| Roads  |                                     |
| Schools (Primary and Secondary)              |                                     |
| District Centre                              |                                     |
| Neighbourhood Centre                         |                                     |
| Local Landmarks (Numbered)<br>1. Clock Tower |                                     |





## Where we want to be




Thornton Heath's Town Centre will be a mix of homes, town centre uses, community and cultural facilities reflecting the local diversity of the population and a range of retailing including many independent shops. The Local Centres at Thornton Heath Pond and Beulah Road will continue to have a strong evening economy. Brigstock Road Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function to meet modern needs. The Town Centre will be firmly connected with Green Grid links that follow the Norbury Brook through Thornton Heath Recreation Ground, together with further green links to Grangewood Park and west onto Mitcham Common.

- To improve access to nature and the quality of the local open spaces, opportunities to de-culvert Norbury Brook in Thornton Heath Recreation Ground will be considered as part of a parks improvement project, but will need to be assessed against the need to provide space for sport and recreation.
- Cycling to Thornton Heath railway station will be supported with additional cycle facilities provided.
- Thornton Heath Town Centre needs an improved gateway from the train station, a new public square and public realm improvements.
- The council will explore with Transport for London the feasibility of a new rapid transit route/tram extension to Norbury via the London Road through Thornton Heath.

## Opportunities, constraints and change up to 2039

- The main focus for sustainable growth of the suburbs will be along the London Road corridor and in Thornton Heath Town Centre. Elsewhere there will be opportunities for windfall sites, limited infilling, and new homes that respect existing residential character and local distinctiveness.
- Croydon University Hospital will evolve and, as the borough's principal health centre, will remain Thornton Heath's largest employer. The Town and Local Centres will continue to support the community, providing employment and services. Community facilities will be encouraged to locate in close proximity.
- Development in flood zones will be guided by the policies of the Plan to reduce flood risk.

Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	172		
Number of homes in Thornton Heath ( <i>the proposed Place target</i> )	1,300 to 1,620	1,190 to 1,490	1,190 to 1,490
What it looks like spatially			



<p><b>Description of the option</b></p>	<p>Outside of Thornton Heath Town Centre and Conservation Areas there will be some evolution within the existing character of the area. Thornton Heath Town Centre will see some moderate intensification with denser development that is in keeping with its character. There will be little change within Conservation Areas. The council will explore with Transport for London the feasibility of a new rapid transit route/tram extension to Norbury via London Road through Thornton Heath.</p>	<p>Thornton Heath Town Centre will see some moderate intensification with denser development that is in keeping with its character. Elsewhere there will be less change. The council will explore with Transport for London the feasibility of a new rapid transit route/tram extension to Norbury via London Road through Thornton Heath.</p>	<p>Thornton Heath Town Centre will see some moderate intensification with denser development that is in keeping with its character. Elsewhere there will be less change. The council will explore with Transport for London the feasibility of a new rapid transit route/tram extension to Norbury via London Road through Thornton Heath.</p>
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**Proposed Site Allocations**

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
103	585-603 London Road	Mixed use development for residential and hotel (up to existing floor space).	22 to 81
105	Strand House, Zion Road	Residential development, subject	12 to 67

Site ref	Name of site	Proposed use	Number of homes (if applicable)
		to impact on designated views	
136	Supermarket, car park, 54 Brigstock Road	Mixed use of residential, retail along Brigstock Road, and employment use	25 to 55
149	Tesco, Thornton Heath	Mixed-use development including retail and residential	45 to 254
248	18-28 Thornton Road	Residential development	9 to 34
326	Ambassador House, 3-17 Brigstock Road	Mixed use conversion comprising residential, retail and community facilities	26 to 145
468	Grass area adjacent to, 55 Pawsons Road	Residential development	13 to 45
499	Croydon University Hospital Site, London Road	Consolidation of the hospital uses on a smaller area of the site with enabling residential development on remaining part subject to there being no loss of services provided by the hospital in	77 to 290

Site ref	Name of site	Proposed use	Number of homes (if applicable)
		terms of both quantity and quality	

### Possible Local Green Spaces

Within Thornton Heath the following green spaces have been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Grangewood Park	Grangewood Park is part of the historic Great North Wood. It is a quiet, secluded oasis in the heart of a busy local area, and has the benefit of a fantastic Friends group of volunteers who work

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	with the local council and other bodies to raise money for park facilities and give their time for gardening, litter picking and a range of community events throughout the year such as community cinema, events with the Wildlife Trusts, the Friends of Grangewood Park picnics and seasonal events (e.g. Halloween, Christmas). It also hosts Forest School sessions.
Thornton Heath Recreation Ground	A local gardening group helps maintain this park. The garden now involves a project involving school children, people with learning difficulties and older people
Trumble Gardens	Thornton Heath action committee have events for the community. Also Age UK use the area for outdoor activities for the over 50s. This park was created as a memorial for the second

Possible Local Green Spaces	Reasons why the space may be demonstrably special and of particular significance to the community it serves
	world war from space which was caused by bombing.
Whitehorse Meadow	The Friends of Whitehorse Meadow group have been involved in community clean ups and often trim back over growing brambles from the pathways.

### Help shape the future of the Place of Thornton Heath

196. How should Thornton Heath change to help meet the need for homes and infrastructure in the borough?
197. What other potential development sites in Thornton Heath should the Local Plan review allocate for development?
198. Do you think any proposed sites in Thornton Heath should be removed from the Local Plan review? If so, which one(s)? Please explain why.
199. What community facilities in Thornton Heath are important to you?
200. What new community facilities are required in Thornton Heath?
201. Are there any green spaces in Thornton Heath that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
202. Are there any other green areas in Thornton Heath (that are not informal green spaces, linear open spaces or Metropolitan Open Land) that should be protected? Please explain why.

# Waddon

## Waddon



## Where we want to be

Waddon will comprise both a growing residential community and protected industrial location. Waddon Road/Abbey Road Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function. Waddon will retain its high levels of accessibility. Simultaneously the area will benefit from improved community provision for walking and cycling routes with an expanded Green Grid network connecting the Wandle Valley Regional Park with Croydon Town Centre. The retail areas along Purley Way, A23, will evolve into a series of interconnected mixed-use developments.

## Opportunities, constraints and change up to 2039

- An area of major new high quality residential and mixed use development will be concentrated on the Purley Way masterplan area, and a possible Local Centre close to Five Ways ensuring strong links with the existing community, particularly on the Waddon Estate.
- Purley Way, a Strategic Industrial Location<sup>54</sup>, and the industrial heartland of the borough, will remain an important centre of employment activity, and a Purley Way Masterplan will be developed to demonstrate where and how the co-location of residential and other uses can occur without prejudice to the amenity and function of both land uses.




- The borough will invest in new community and education facilities, such as a proposed football 'hub' facility at Purley Way Playing Fields, supplementing the high quality indoor leisure offer at Waddon Leisure Centre.
- Opportunities for public realm improvements will focus on Five Ways (linked to the Five Ways junction improvements), where a possible Local Centre could be located. Improved connections to Croydon Town Centre and Wandle Valley Regional Park via Wandle Park and Waddon Ponds will be sought, improving and expanding the Green Grid to promote strategic east/west and north/south links.
- Opportunities to improve the functioning of the A23 and junction improvements at Five Ways will be complete by 2023.
- To encourage walking and cycling, high quality connections within an attractive environment will be sought to reduce the severance effect of the Purley Way road, railway and tram lines.
- The council will explore with Transport for London the feasibility of a new rapid transit route/tram extension to Purley (via Purley Way) and Sutton.

<sup>54</sup> Strategic Industrial Locations are the most important industrial areas in London as identified by the Mayor of London in the London Plan. There

should be strong protection for industrial and warehousing uses in Strategic Industrial Locations.



Growth Scenarios

	Strategic option 1 – All residential growth to take place in the existing urban area.	Strategic option 2 – Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.	Strategic option 3 – Limited release of Green Belt land for residential development to reduce some pressure off residential growth in the existing urban area.
Homes already under construction	95		
Number of homes in Waddon (the proposed Place target)	550 to 680 <i>(plus 2,110 to 3,250 homes in the Purley Way Transformation Area)</i>	440 to 550 <i>(plus 6,860 to 8,740 homes in the Purley Way Transformation Area)</i>	440 to 550 <i>(plus 2,110 to 3,250 homes in the Purley Way Transformation Area)</i>
What it looks like spatially			

<p><b>Description of the option</b></p>	<p>Throughout Waddon, Conservation Areas will see little change. Away from the Purley Way Regeneration Area there will be some evolution of the more accessible residential areas<sup>55</sup>, respecting the existing character. Other areas will see less change. In the Purley Way Regeneration Area the retail parks will be redeveloped into a new neighbourhood, mixing retail, leisure and new homes. The council will explore the feasibility with Transport for London, the feasibility of rapid transit routes/tram extensions along the Purley Way through Waddon, linking Ampere Way and Purley, as well as to Sutton.</p>	<p>Away from the Purley Way Regeneration Area there will be less change. In the Purley Way Regeneration Area the retail parks will be redeveloped into a major new neighbourhood consisting of very high density developments that mix retail, leisure and new homes. The council will explore the feasibility with Transport for London, the feasibility of rapid transit routes/tram extensions along the Purley Way through Waddon, linking Ampere Way and Purley, as well as to Sutton.</p>	<p>Away from the Purley Way Regeneration Area there will be less change. In the Purley Way Regeneration Area the retail parks will be redeveloped into a new neighbourhood, mixing retail, leisure and new homes. The council will explore the feasibility with Transport for London, the feasibility of rapid transit routes/tram extensions along the Purley Way through Waddon, linking Ampere Way and Purley, as well as to Sutton.</p>

<sup>55</sup> Those areas with a PTAL of 3 or above or within 800m of a train station or tram stop

## Proposed Site Allocations

Site Allocations are identified for future housing and other development, such as schools, health facilities and community facilities. For each site, the location, the proposed use and indicative number of homes (if applicable) is provided.

Site ref	Name of site	Proposed use	Number of homes (if applicable)
11	Croydon Garden Centre, 89 Waddon Way  <i>(a site within the Purley Way transformation area)</i>	Residential development	35 to 94
16	Heath Clark, Stafford Road  <i>(a site within the Purley Way transformation area)</i>	Secondary School and residential development subject to access from Stafford Road	62 to 128
25	Morrisons Supermarket, 500 Purley Way  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community	251 to 1028

Site ref	Name of site	Proposed use	Number of homes (if applicable)
48	294-330 Purley Way  <i>(a site within the Purley Way transformation area)</i>	Mixed use development comprising retail store, commercial space and residential units	115 to 233
110	Old Waddon Goods Yard, Purley Way  <i>(a site within the Purley Way transformation area)</i>	Mixed use development incorporating residential, retail and food & drink (with the retail and food & drink elements limited to the current amount of floor space)	39 to 221
125	Sainsburys, Trafalgar Way  <i>(a site within the Purley Way transformation area)</i>	Mixed use residential and retail development (with retail floor space limited to no more than currently exists on the site)	38 to 141
152	Parklife, Purley Way playing fields	Multi-purpose leisure facilities	n/a
316	PC World, 2 Trojan Way  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS)	47 to 175

Site ref	Name of site	Proposed use	Number of homes (if applicable)
	<i>transformation area)</i>	and community uses to form the basis of a new residential community	
332	Superstores, Drury Crescent  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community	66 to 246
349	Harveys Furnishing Group Ltd, 230-250 Purley Way  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community. As the site is partly within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment	21 to 78
350	Wing Yip, 544 Purley Way	Redevelopment of a mix of residential,	69 to 260

Site ref	Name of site	Proposed use	Number of homes (if applicable)
	<i>(a site within the Purley Way transformation area)</i>	retail, commercial and community uses to form the basis of a new residential community	
351	Furniture Village, 222 Purley Way  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by NHS) and community uses to form the basis of a new residential community	32 to 120
355	Decathlon, 2 Trafaglar Way  <i>(a site within the Purley Way transformation area)</i>	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community	59 to 221
946	Stubbs Mead Depot, Factory Lane  <i>(a site within the Purley Way transformation area)</i>	Mixed residential and employment (industry and warehousing)	157 to 440

## Possible Local Green Spaces

Within Waddon the following green space has been identified as being demonstrably special and of particular significance to the local community. However, for each and every possible Local Green Space, to maintain it is a designation the council will require more detailed evidence. The council will contact all relevant individuals, residents' association and 'friends of' groups asking for further information about the 'demonstrably special' feature of the green space.

Proposed Local Green Space	Reasons why the space may be demonstrably special and of particular significance to the community it serves
Layton Crescent	The Layton and Page Crescents' large green spaces have hosted community events in the past and community Christmas Lights.

Waddon Ponds

Town Park

## Other green areas to be protected by the Local Plan review

A number of green spaces, which have not met the Local Green Space designation criteria, will be protected in the Croydon Local Plan under the 'other green spaces' policy. Informal green spaces and linear open spaces are not listed below, but would still be protected by the Local Plan review.

Other green area to be protected by Local Plan review	Type of other green space
Duppas Hill	Town Park

## Help shape the future of the Place of Waddon

203. How should Waddon change to help meet the need for homes and infrastructure in the borough?
204. What other potential development sites in Waddon should the Local Plan review allocate for development?
205. Do you think any proposed sites in Waddon should be removed from the Local Plan review? If so, which one(s)? Please explain why.
206. What community facilities in Waddon are important to you?
207. What new community facilities are required in Waddon?
208. Are there any green spaces in Waddon that should be protected as Local Green Spaces? Please provide evidence as to why they are irreplaceable for you.
209. Are there any other green areas in Waddon (that are not informal green spaces, linear open spaces or Metropolitan Open Land) that should be protected? Please explain why.



- Key
- Proposed Site Allocation
  - Proposed Local Green Space
  - Non designated green space

Scale 1:10 000  
0 500 1000 1500 metres  
1 mile

WALLINGTON

120

152

114

110

48

316

349

351

334

314

348

8

248

416

103

499

136

149

116

284

951

58

28

59

357

105

105

468

78

22

396

471

203

123

440

493

199

46

68

504

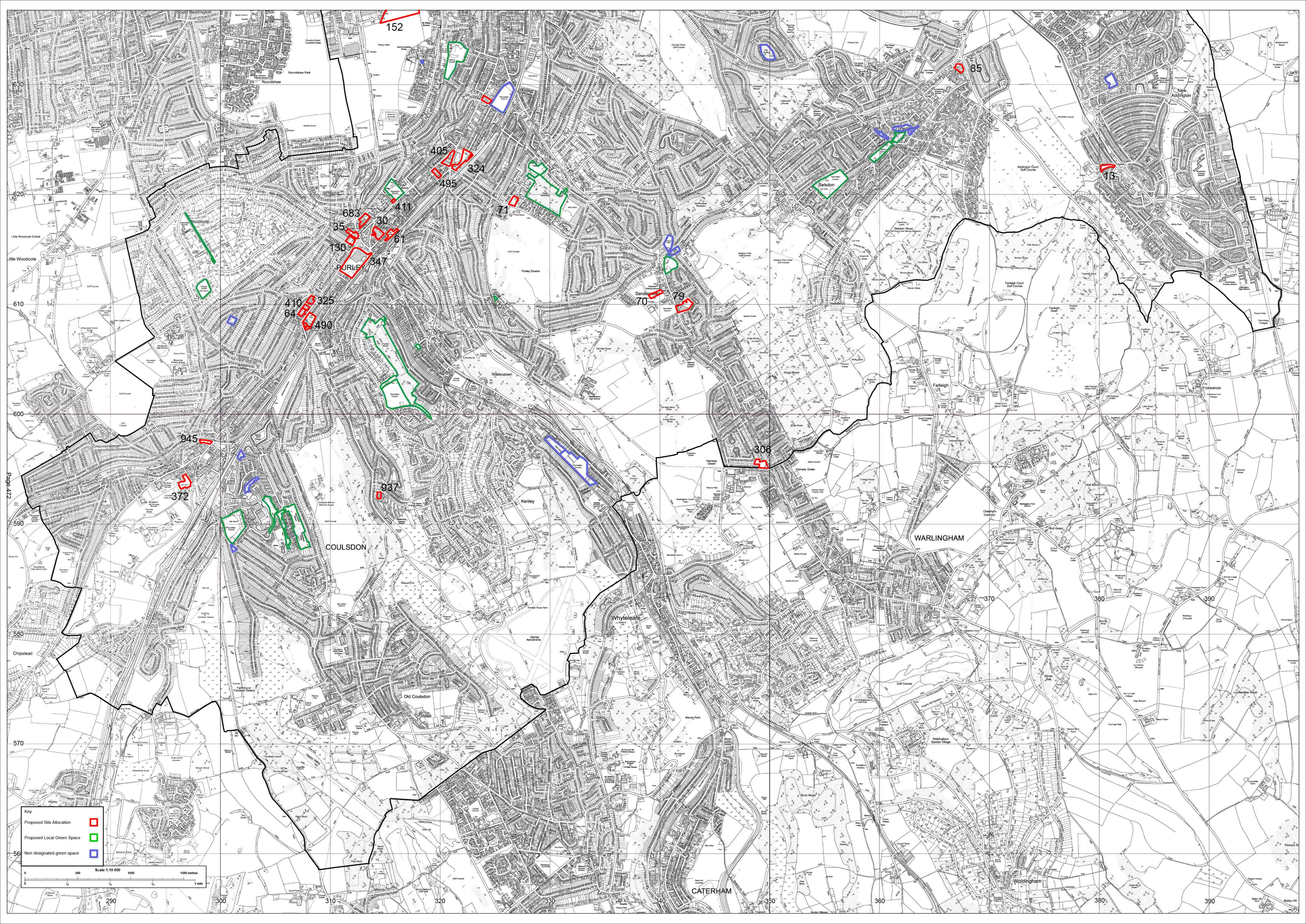
128




87

89

120

152



Key  
Proposed Site Allocation   
Proposed Local Green Space   
Non designated green space 

Scale 1:10 000  
0 500 1000 1500 metres  
1 mile

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290 300 310 320 330 340 350 360 380 390



# Equality Analysis Form

# 1. Introduction

## 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term ‘**proposed change**’ broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

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# 2. Proposed change

<b>Directorate</b>	<b>Place</b>
<b>Title of proposed change</b>	<b>Review of South London Waste Plan – no proposed change yet</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Julia Dawe</b>

**2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)**

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

**This is a proposal to consult on an updated adopted Planning Document – The South London Waste Plan**

<https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sl-waste-plan> this is the current plan that is being reviewed.

**The document consultation document will be used to ask whether the policies for determining planning applications for waste sites are appropriate and proposes sites to be retained for waste management operations.**

**This is not a plan about waste disposal or recycling operations.**

**3. Impact of the proposed change**

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**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

**3.1 Deciding whether the potential impact is positive or negative**

**Table 1 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	

Disability	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	
Gender	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	
Gender Reassignment	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	
Marriage or Civil Partnership	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	
Religion or belief	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	
Race	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	
Sexual Orientation	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	
Pregnancy or Maternity	Waste needs to be managed otherwise there will be nowhere for it to go.	No negative impact	

**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:		
<b>Additional information needed and or Consultation Findings</b>	<b>Information source</b>	<b>Date for completion</b>
<b>The final policy will have a Sustainability Appraisal undertaken and an Equalities Impact assessment once the final policies are drafted after the first round of consultation</b>	<b>Sustainability Appraisal including Equalities Impact Assessment</b>	<b>April 2020</b>

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

**Key**

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	1	1	1
Disability	1	1	1
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

# Equality Analysis

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.

Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				

Marriage/civil partnership				
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## 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b>	<b>X</b>
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b>	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the 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. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b>	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Meeting Date: 21 <sup>st</sup> October 2019



## 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name:</b> Yvonne Okiyo <b>Date:</b> 23.09.19 <b>Position:</b> Equalities Manager
<b>Director</b>	<b>Name:</b> Heather Cheesbrough <b>Date:</b> 27.9.2019  <b>Position:</b> Director of Planning and Strategic Transport

Further review of this Equalities Impact Form will need to take place after the regulation 18 consultation responses have been analysed. Another review will take place when policies are developed for regulation 19 (Submission stage) alongside the Sustainability Appraisal.

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## 2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

<p>Whose information is being used?</p> <ul style="list-style-type: none"> <li>- Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person</li> </ul>	<p>Anyone who comments in writing to the Local Plan Review or the South London Waste Plan, either at the Issues and Options/draft Plan stage (regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012, or at the Proposed Submission publication of the plan stage (regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> <li>- Consider the nature of this information E.g. Child's social care file</li> </ul>	<p>The names and contact details will be used to notify respondents of future stages of Local Plan preparation. However, they will have the option to opt out of future notifications should they not wish to hear in future from the Council regarding the Local Plan Review or South London Waste Plan. However, in accordance with the LDF Consultation Database privacy statement available online, the data will be used to support the preparation of the statutory development plan for Croydon and its supporting documents. Data may be shared with the Planning Inspectorate and any appointed Programme Officer (who may be external to the Council) in relation to the Examination in Public of the statutory development plan for Croydon. All data will be kept indefinitely. At any stage a person may request to be removed from the Consultee Database. If a request to be removed from the Consultee Database is made and the person has made any representations on the statutory development plan (either the Local Plan Review or the South London Waste Plan) and that plan or supporting document still forms part of Croydon's planning policies</p>

	<p>then you will no longer receive any correspondence from Croydon Council using the Local Plan Consultee Database but your details will still be held on the database until all documents that you have made representations on are no longer part of Croydon’s planning policy framework, at which point your details will be permanently deleted. This is because the Council has to keep records of representations made on the statutory development plan.</p> <p>If a person has not made a representation onf a current or emerging statutory development plan, and requests to be removed from the database, then their data will be permanently deleted.</p>
<p>Does it include special category or criminal offence data?</p>	<p>If any representations made to the Council contains ‘sensitive data’ (which includes racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; or health, sex life and/or sexual orientation) then this may be held within the database if it is relevant to the comments being made (as part of a summary of the representation) on the basis that by submitting the information, the person who made the representation is giving their explicit consent to the sensitive data being held within the database.</p>
<p>Can an individual be identified easily from the information?</p>	<p>Yes they will give their name, and their postal and/or e-mail address.</p>
<p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> <li>- <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i></li> <li>- <i>E.g. could it be sold?</i></li> </ul>	<p>If someone got hold of the information they could sell it as a contact list. If a person has included ‘sensitive data’ in their representations to the Council, and that information is relevant to their representation, then this information could be</p>
<p>Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i></p>	<p>We will need to summarise the information for potential inclusion in a Statement of Consultation on the Local Plan Review or South London Waste Plan. No personal</p>

	<p>data will be included in this statement, and any sensitive data will need to be redacted.</p> <p>At the Proposed Submission (regulation 19) stage of the Local Plan Review and South London Waste Plan, all data including un-redacted representations will be forwarded to the Planning Inspectorate to enable the examination of the Local Plan. This is made clear in the Privacy Statement available online. and once that is done the information will be anonymised so that the person who made the comment can not be identified publicly.</p>
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### 3 Consultation process

#### Consider how to consult with relevant stakeholders.

When did you consult individuals?	We will consult from when the consultation starts for 7 weeks from 31 <sup>st</sup> October 2019
How did you consult individuals?	They will be able to submit comments in a number of ways; on line survey, email and letter.
If not explain why it is not appropriate.	NA
Who else within the organisation have you consulted with?	Communications Team
Do you need to speak with your processor to assist?	No
Do you plan to consult information security experts or any other experts?	No

**4 Assessment of necessity and proportionality of data usage**

What is your lawful basis for processing?	Planning and Compulsory Purchase Act 2004 supported by the Town and Country Planning (Local Planning)(England) Regulations 2012
Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?	We will explain that comments may be made public but their details will not.
Does the processing actually achieve your purpose?	We are required to consult to meet the Town and Country Regulations
How will the information be collected? Verbally, forms, intranet, interview, 3 <sup>rd</sup> party, anonymous)	Inputted by the person themself
Is there another way to achieve the same outcome?	No
How will the information be used? <i>e.g. to write a report</i>	To develop policies in a Development Plan Document
Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?	There is information on any form that is used that explains why we need their data and that they can request to opt out. We only need their data if they wish to be kept informed at this stage so they can opt out.
How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i>	<p>It will be stored on a SQL database saved on a Council server. All original correspondence will be saved on Council server (not SharePoint) with access limited to members of Spatial Planning service.</p> <p>In accordance with the privacy statement, once the Local Plan Review or the South London Waste Plan no longer form part of the statutory development plan for Croydon the data can be deleted. Note it is likely that the documents will remain part of the statutory development plan in full or in part until the late 2020's/early 2030's.</p> <p>Paper records will be scanned as soon as possible upon receipt, with the electronic copy saved on a secure server, and the paper copy destroyed securely.</p>
How will you ensure data quality and data minimisation?	The person will input the details themselves.

Who will have access to the information within LBC? - <i>Include approximate number of users</i>	The staff in the Spatial Planning Team and our business support (c.15 users)
Are there new or significant changes to the way we manage, use, handle or collect this information? - <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i>	No we have always collected and used this information like this for planning documents.
Will individuals within an existing database be subject to new or changed handling? - <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i>	No
What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i>	As per question above – c.15 people
How will the information be updated? <i>e.g. monthly check</i>	The information will not be updated. If people change their contact details they submit it on the form on this page <a href="https://www.croydon.gov.uk/planningandregeneration/framework/localplan/croydon-local-plan---partial-review">https://www.croydon.gov.uk/planningandregeneration/framework/localplan/croydon-local-plan---partial-review</a>
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	No
How will you prevent function creep?	The information is very specific and not very much use to anyone so unlikely but we will not share it (except with an appointed Programme Officer, and the Planning Inspectorate to enable the examination of the Local Plan Review and the South London Waste Plan). This is made clear in our privacy statement online.

## 5 Assessment of the risks to the rights and freedoms of data subjects

*You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.*

### 5a Security

Who will be responsible for the control for this information?	Project manager
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How will the access to this information be controlled?	SQL database has controlled access. Council's server ( <a href="\\lbcbau.croydon.net\grpdata\prc">\\lbcbau.croydon.net\grpdata\prc</a> ) is restricted to members of Spatual Planning.
Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	Yes
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	The

### 5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	At later stages of the Local Plan Review and South London Waste Plan, any representations received at the Proposed Submission (regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012) stage will be shared with the Planning Inspectorate. This is a legal requirement. All contact with the Planning Inspectorate is made via an appointed programme officer, who is also external to Croydon Council.
What purpose does the information we are sharing have to the third party?  - <i>Ensure that we only share relevant information and not excessively</i>	It is a requirement of regulation 22 of the Town and Country Planning (Local Planning)(England) Regulations 2012.  In order to ensure that the Planning Inspector appointed by the Secretary of State is independent of the Council all dealings with the Planning Inspector are done via a Programme Officer. This is a requirement of the Planning Inspectorate.
Who will have access to the information, externally?  - <i>Include approximate number of users</i> - <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i>	3 people (1 programme officer, 1 planning inspector, 1 administrative person at the Planning Inspectorate)
How will it be transmitted to third parties and when? How often? - <i>Provide details of software used</i>	Through secure mail courier, or electronic transfer.



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Is there a data sharing agreement in place?	No
At what stage will the information be transferred?	At Regulation 22 of the Town and Country Planning (Local Planning)(England) Regulations 22. This is scheduled to take place in January 2021.

**5c Identified Risks and assessment:**

*You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.*

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

**To be completed by Project Sponsor**

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating
Loss of the data – someone steals it	2	2	4

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**6 Identify measures put in place to reduce risk.**

*You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.*

**To be completed by the Project Sponsor**

<b>Risk Identified</b>	<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b> <i>Eliminated / reduced / accepted</i>	<b>Residual risk</b> <i>Low / medium / high</i>	<b>Measure approved</b>  <i>Yes / No</i>
<b>Lost outside the organisation</b>	<b>Keep the information on secure SQL database and on secure server with limited access</b>	Reduced	low	
<b>Names and addressed printed</b>	<b>Destroy all paper copies of representation once it has been scanned and saved on secure server</b>	Reduced	low	

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**Sign off and Record sheet**

Item	Notes, Name and date
Measures approved by:	
Residual risks approved by: <i>(If accepting any residual high risk must consult ICO before going ahead.)</i>	
IM advice provided:	
DPO advice provided: <i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i>	
IM sign off:	
DPO final sign off:	

**If you require further guidance to complete this DPIA please contact:**

**Information Management Team (IMT)**

Ext: 47777

Email: [information.management@croydon.gov.uk](mailto:information.management@croydon.gov.uk)

**Data Protection Officer**

Email: [DPO@croydon.gov.uk](mailto:DPO@croydon.gov.uk)

<b>REPORT TO:</b>	<b>CABINET</b> <b>21 OCTOBER 2019</b>
<b>SUBJECT:</b>	<b>Issues and Preferred Options Consultation on the Draft South London Waste Plan</b>
<b>LEAD OFFICER:</b>	<b>Director of Planning and Strategic Transport - Heather Cheesbrough</b> <b>Head of Spatial Planning – Steve Dennington</b>
<b>CABINET MEMBER:</b>	<b>Councillor Scott – Cabinet Member for Environment, Transport &amp; Regeneration (Job Share)</b> <b>Councillor King – Cabinet Member for Environment, Transport &amp; Regeneration (Job Share)</b>
<b>WARDS:</b>	<b>All</b>

**CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON**

[Corporate Plan for Croydon 2018-2022](#)

Through this consultation as the first stage of the review of the 2012 South London Waste Plan, the Council will ensure that Croydon meets the corporate plan priority to have a cleaner and more sustainable environment. The South London Waste Plan enables Croydon to plan for the management of waste and recycling, taking account of the growth in the population and the emerging London Plan’s waste apportionments.

**FINANCIAL IMPACT**

In 2018, the four boroughs in the South London Waste Partnership successfully bid for £136,594 from the Ministry of Housing, Communities and Local Government’s Planning Delivery Fund for joint working to produce a new South London Waste Plan. There are still current funds available and these are sufficient to take the South London Waste Plan through this round of consultation. This was the first tranche of the Planning Delivery Fund and a there is a planned second bidding round to cover the financial period 2019-20. Officers will be seeking funds from the second round of the fund to complete the project.

**FORWARD PLAN KEY DECISION REFERENCE NO.: 2019CAB**

This is a Key Decision as defined in the council’s constitution. The decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee by the requisite number of councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

## **1. RECOMMENDATIONS**

The Cabinet is recommended to

- 1.1 That the Cabinet approve the Issues and Preferred Options Consultation South London Waste Plan (Appendix 1) for consultation to run for six weeks between October and December 2019 in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012; and
- 1.2 That Cabinet delegate minor and / or factual changes to the Issues and Preferred Options Consultation South London Waste Plan prior to consultation to the Director of the Director of Planning and Strategic Transport in consultation with the Cabinet Member for Environment, Transport and Regeneration (Job Share).

## **2. EXECUTIVE SUMMARY**

- 2.1 The purpose of this report is to seek Cabinet approval to the Issues and Preferred Options Consultation South London Waste Plan for consultation for a period of a minimum of 6 weeks, to take place between October and December 2019.
- 2.2 This is a joint plan undertaken by the four boroughs of Merton, Kingston, Sutton and Croydon which updates the adopted South London Waste Plan 2012-22 which allocated sites, created planning policies and designated areas suitable for waste management development. This existing South London Waste Plan will finish in 2022. The Issues and Preferred Options Consultation South London Waste Plan sets out how the projected amounts of waste to be generated within the area and the amount of waste apportioned to the partner boroughs in the draft London Plan will be managed.

## **3. DETAIL**

- 3.1 Waste management is a strategic planning issue across London and a challenge for all successful urban areas. As Waste Planning Authorities, all London Boroughs have a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008).
- 3.2 The National Planning Policy for Waste states that waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their waste plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.
- 3.3 In 2012 the four boroughs of Merton, Kingston, Sutton and Croydon adopted the 10-year South London Waste Plan which allocated sites, created planning

policies and designated areas for waste management development. This existing South London Waste Plan will finish in 2022. Therefore an updated Waste Plan needs to be produced for the time period beyond 2022. This new plan will need to take account of the waste produced by population growth and deal with a proportion of the waste in London as a target set out in the emerging London Plan.

- 3.4 The four boroughs have agreed to work together again and produce a new South London Waste Plan in line with government policy and guidance. The new South London Waste Plan will again cover the geographical area of the London boroughs of Croydon, Kingston, Merton and Sutton.
- 3.5 The London Plan sets the boroughs the target of managing 100% of London's waste within Greater London by 2026 and having zero biodegradable and recyclable waste going to landfill by 2026. It also sets targets for local authority-collected waste, commercial and industrial waste and construction, demolition and excavation waste.
- 3.6 With a significant need for new homes and consequent commercial activity planned across London, the need to provide essential infrastructure such as waste facilities to meet this growth is therefore a regional strategic priority.
- 3.7 The new South London Waste Plan will give the opportunity for the four south London boroughs to ensure that they conform to the waste-related policies in the London Plan, the National Planning Policy Framework and the National Planning Policy for Waste. It will also help the four boroughs to work together to review the long-term vision and objectives to consider waste as a resource in South London, supporting the circular economy.
- 3.8 Since the current South London Waste Plan was adopted in 2012, the four boroughs have been working closely together on:
  - Monitoring the South London Waste Plan annually
  - Fulfilling the legal Duty to Co-operate with other councils on waste management issues, responding to other Local Development Plans for waste management.
  - Preparing and submitting a successful bid for government funding to support a new South London Waste Plan 2021-2036 on the basis of joint working.
- 3.9 In 2018 the four boroughs successfully bid for government funding (Planning Delivery Fund – Joint Working) for £136,594 to support the project.

#### Relationship with the South London Waste Partnership

- 3.10 Although the South London Boroughs already work together as the South London Waste Partnership and have a shared contract for the municipal collection and disposal of waste, the South London Waste Plan relates to the waste planning functions and responsibilities of the South London Boroughs as Waste Planning Authorities. This is not a plan about waste collection or disposal.
- 3.11 As a Local Development Plan document, at a strategic level, the South London Waste Plan considers the local authority collected waste and the other forms of

waste collected by private contractors, and accordingly safeguards sufficient sites to treat both the South London Waste Partnership's waste needs and that of other commercial waste operators.

- 3.12 At a more detailed level, the policies in the South London Waste Plan will be used to assess the merits of any planning application submitted by the South London Waste Partnership's contractor or any other commercial waste operator.
- 3.13 The revised South London Waste Plan will cover:
- Strategic planning policies that set out how applications for each type of waste, e.g. Local Authority Collected Waste, Construction, Demolition and Excavation Waste, Hazardous Waste, Agricultural Waste, Clinical Waste, Radioactive Waste, Waste Water will be treated.
  - Detailed planning policies that set out how applications will be assessed with regards to matters such as sustainable construction, amenity impacts, transport, sustainable energy recovery and planning obligations.
  - Sites safeguarded for waste facilities, with relevant issues highlighted for each site, if proposals were developed for intensification of the existing waste operations.
- 3.14 The partner boroughs jointly appointed consultants, to review all the relevant waste data within the four partner boroughs, such as, the features of the existing waste transfer and management sites, the origin, destination and quantity of each type of waste that is imported and exported, the projected amounts of waste to be generated within the area and the capacity to manage the amount of waste apportioned to the partner boroughs in the draft London Plan.
- 3.15 The findings of the Technical Report (see Appendix 2), together with new national and London-wide policy and research, has informed the Issues and Preferred Options South London Waste Plan, which is attached to this report as (see Appendix 1). Importantly, officers are now recommending that large industrial areas are no longer designated as areas suitable for waste facilities, as is currently the case with policy WP4 'Industrial Areas with Sites Suitable for Waste Facilities', in the adopted South London Waste Plan (2012). Instead, officers propose the safeguarding of the existing waste transfer and management sites.
- 3.14 The Issues and Preferred Options South London Waste Plan consultation document attached sets out the vision, strategy and proposed policies for consideration as issues and options. The document has questions throughout, asking respondents to comment on certain issues. The final version of the South London Waste Plan will be drafted as informed by the results of this round of consultation and a final Development Plan Document produced.

#### **4. CONSULTATION**

- 4.1 Subject to Cabinet's approval, it is proposed that public consultation will take place from late October 2018 until early December 2018, for a period of 6 weeks. The consultation will be undertaken in accordance with the Council's Statement of Community Involvement and The Town and Country Planning (Local Planning) (England) Regulations 2012.



- 4.2 The consultation will be promoted by:
- Sending it to those groups, residents associations, nature conservation bodies, individuals, landowners, developers and others on the Council's Local Development Framework consultation database.
  - Promoting it on the Council's website and social media
  - Subject to Cabinet approval, associating this consultation with the Croydon Local Plan consultation to gain further coverage while ensuring that the two consultations complement each other.
- 4.3 Officers will also fulfil the legal Duty to Co-operate with other councils on waste management issues.

## 5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

### 5.1 Revenue and Capital consequences of report recommendations

These are as set out below.

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20	2020/21	2021/22	2022/23
	£'000	£'000	£'000	£'000
<b>Revenue Budget available</b>				
Expenditure	90			
Income				
<b>Effect of decision from report</b>				
Expenditure	1			
Income				
<b>Remaining budget</b>	89			
<b>Capital Budget available</b>				
Expenditure				
<b>Effect of decision from report</b>				
Expenditure				
<b>Remaining budget</b>				

- 5.2 **The effect of the decision**  
 The decision will commit Croydon to undertake a consultation on the Issues and Preferred Options South London Waste Plan. Subject to Cabinet approval, this will be undertaken alongside the Issues and Options Local Plan Review consultation so expenses will be shared. Croydon, as will the other 3 partner waste authorities will have £500 towards consultation expenses.
- 5.3 **Risks**  
 There is a risk that the second round of government funding will not be available and the four local authorities will have to continue to produce the waste plan from

the Councils' budgets. The remaining funds available from the grant after the effect of the decision are £89,000. This budget will cover almost all of the remaining stages and work, but the project may need to be completed by additional in house staff resources.

#### **5.4 Options**

The alternative is for each borough to produce a waste related Local Development Plan independently, which would be far more resource intensive and expensive for each borough. The production of a 'sound' Development Plan Document would in any case require neighbouring boroughs to collaborate in order to develop consistent policies and proposals in line with the legal requirement of "duty to co-operate". Furthermore, independent working may trigger a requirement to reimburse the government funding that has been awarded to this project, for 'joint working'.

#### **5.5 Future savings/efficiencies**

The project is being fully funded to this stage by a government grant. It is anticipated that the round two funding will cover the entire costs of completing the project.

Approved by Lisa Taylor, Director of Finance, Investment and Risk, S151 Officer.

### **6. LEGAL CONSIDERATIONS**

- 6.1 The Director of Law and Governance comments as waste planning authorities (WPAs), each of Croydon, Kingston, Sutton and Merton have a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008). The recommendations set out in this report are in furtherance of that obligation.

Approved by Sean Murphy, the Director of Law and Governance & Deputy Monitoring Officer

### **7. HUMAN RESOURCES IMPACT**

- 7.1 There are no Human Resource impact as the production of the South London Waste Plan is set out in the Spatial Plan Service Plan and can be delivered with the current establishment staff level.

Approved by Sue Moorman, Director of Human Resources.

### **8. EQUALITIES IMPACT**

- 8.1 As this is an Issues and Preferred Options document, no policies have yet been finalised so a full Equalities Impact Assessment cannot be undertaken but a screening has taken place to inform the next stage. This is consistent across all four partner authorities. A full Equalities Impact Assessment will be undertaken at the next stage of the plan's production.

Approved by: Yvonne Okiyo – Equalities Manager

## **9. ENVIRONMENTAL IMPACT**

- 9.1 The South London Waste Plan will enable the partner authorities effectively plan for waste in a sustainable way addressing environmental impacts. Furthermore, the Issues and Preferred Options South London Waste Plan is accompanied by a Sustainability Appraisal scoping report, which further assesses the impact of the Issues and Preferred Options South London Waste Plan.

## **10. CRIME AND DISORDER REDUCTION IMPACT**

- 10.1 There are no know direct crime and disorder impacts.

## **11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 11.1 The consultation document will be the first stage in producing an updated South London Waste Plan that plans at a strategic level for sufficient sites and policies to treat both the South London Waste Partnership's waste needs and that of other commercial waste operators.
- 11.2 At a more detailed level, the policies in the South London Waste Plan will be used to assess the merits of any planning application submitted by the South London Waste Partnership's contractor or any other commercial waste operator.
- 11.3 For this reason it is recommended to undertake this first round of consultation to enable an updated Development Plan Document for waste in Croydon, jointly across the South London Waste Planning area for a 10 year period and meet the statutory duty to have an up to date Development Plan.

## **12. OPTIONS CONSIDERED AND REJECTED**

- 12.1 The waste plan could have been produced to only cover the borough but it would not have the benefit of planning strategically and would be more costly to produce, so a joint plan has been undertaken. As a Waste Planning Authority, Croydon has a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008). Therefore, it is not an option not to produce a waste plan.

## **13. DATA PROTECTION IMPLICATIONS**

- 13.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**YES**

All consultation responses will be held in the Croydon Local Plan consultation database. This will include personal data. This data will need to be held until a date no earlier than 6 weeks after the date on which the South London Waste Plan is formally adopted by the Council; or at the conclusion of any application by an aggrieved party to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004; whichever is the later date. This is so the Council can document that the Local Plan Review has been prepared in compliance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning)(England) Regulations 2012.

**13.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**YES**

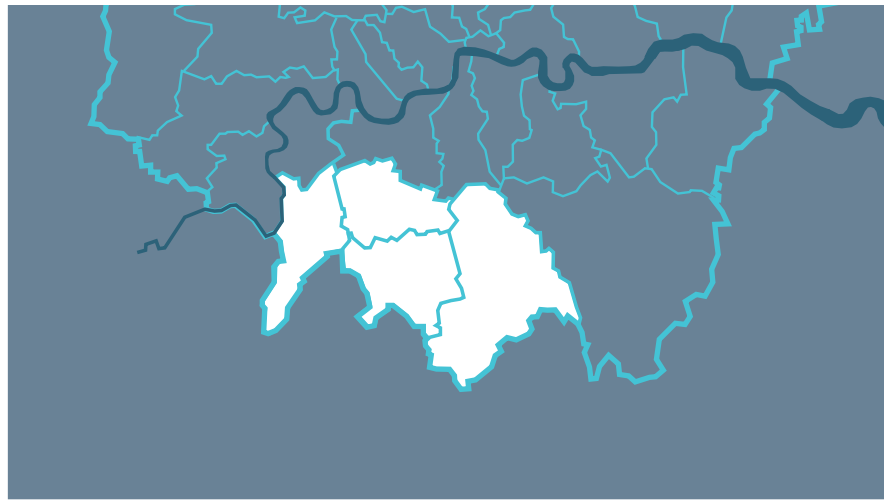
The Director of Planning and Strategic Transport confirms that a DPIA has been completed and signed off and will be kept under review.

Approved by: Steve Dennington on behalf of the Director of Planning and Strategic Transport

---

<b>CONTACT OFFICER:</b>	Steve Dennington Head of Spatial Planning, extension 64973 or Julia Dawe, Plan Making Officer, extension 64365
<b>APPENDICES TO THIS REPORT:</b>	Appendix 1 – draft South London Waste Plan Consultation Document Appendix 2 - South London Waste Technical Paper, June 2019 (Anthesis)
<b>BACKGROUND PAPERS:</b>	South London Waste Plan, adopted 2012 Emerging London Plan

- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



# South London Waste Plan



## Issues and Preferred Options Consultation Document

October 2019





## The Consultation

This is an Issues and Preferred Options consultation document for the development of a new South London Waste Plan 2021-2036. This document is essentially an updated version of the currently adopted Waste Plan and additionally includes questions to act as prompts to help with the consultation.

This consultation is undertaken to meet the requirements of Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

The timetable for and how and where further information about the consultation is as follows:

### Consultation dates

Thursday 31st October - Sunday 22nd December 2019

**Copies of the document and evidence are available:**

- <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sl-waste-plan>
- [www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/1353/new\\_local\\_plan](http://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/1353/new_local_plan)
- [www.merton.gov.uk/local-plan](http://www.merton.gov.uk/local-plan)
- [www.sutton.gov.uk/currentconsultations](http://www.sutton.gov.uk/currentconsultations)

Hard copies of the documents are available at council offices and libraries across the four boroughs.

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## The South London Waste Plan – What it is

- 1.1 The South London Waste Plan will set out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 to 2036. It will be used for the determination of planning applications relating to waste facilities (i.e. a facility on a site where waste is sorted, processed, recycled, composted or disposed of or a facility on a site where waste is mainly delivered for bulking prior to transfer to another place for processing, recycling, composting or disposal). Development for waste facilities should only be allowed in accordance with this plan and other documents and plans which constitute a borough's Development Plan, unless material considerations indicate otherwise.



- 1.2 The South London Waste Plan is a joint Development Plan Document and will form part of the Development Plans for the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton.
- 1.3 Most adopted plans within a borough's Development Plan, such as a Local Plan or Core Strategy, are likely to have policies which are also relevant to a waste application. Each borough may also have adopted Supplementary Planning Documents which may be relevant. Furthermore, applications will also be decided according to the policies of the Mayor of London's London Plan, which is also part of the Development Plan. Therefore, for the development of a waste facility, a number of adopted plans and supplementary planning documents will have to be consulted.
- 1.4 For further information, in the first instance, visit the planning policy pages of the relevant borough's website:
- <https://www.croydon.gov.uk/planningandregeneration/framework>
  - [www.kingston.gov.uk/info/200157/planning\\_strategies\\_and\\_policies/285/development\\_plan\\_documents](https://www.kingston.gov.uk/info/200157/planning_strategies_and_policies/285/development_plan_documents)
  - [www.merton.gov.uk/planning-and-buildings/planning/localplan](https://www.merton.gov.uk/planning-and-buildings/planning/localplan)
  - [www.sutton.gov.uk/planningpolicy](https://www.sutton.gov.uk/planningpolicy)
- 1.5 The London Plan can be accessed at:  
[www.london.gov.uk/what-we-do/planning/london-plan](https://www.london.gov.uk/what-we-do/planning/london-plan)



## Introduction

### Background

- 2.1 The four south London boroughs of Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In 2007, the four boroughs decided to plan for waste collaboratively and produce a joint Development Plan Document (DPD), covering the principal types of waste such as household, commercial and industrial and construction and demolition waste. This resulted in the production of the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. This South London Waste Plan Issues and Preferred Options document is the start of the process of updating the 2012 waste plan and is anticipated to be adopted in 2021. It will then cover the planning period 2021 to 2036.
- 2.2 The South London Waste Plan sets out the partner boroughs' long-term vision, spatial strategy and policies for the sustainable management of waste over the next 15 years. Policies and site safeguarding set out in detail how the four boroughs will meet their waste management targets and limit the impact of waste facilities.
- 2.3 The South London Waste Plan boroughs should prepare a waste local plan in line with Article 28 of the Waste Framework Directive (2008, as amended). This plan must set out an analysis of the current waste management situation and future forecasts, an assessment of the need for waste installations, location criteria for sites and policies.
- 2.4 The "National Planning Policy for Waste" (NPPW), published in 2015, sets out the Government's waste planning policies which all Waste Planning Authorities must have regard to when developing local waste plans. The NPPW is supplemented by the "Planning Practice Guidance" section on waste which provides further detail on how to implement the policies.
- 2.5 The NPPW states that Waste Planning Authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

## Planning for Waste

### The Waste Hierarchy

- 2.6 The underlying philosophy for the management of waste is reflected in the waste hierarchy which ranks waste options according to a priority which is usually shown in an inverted pyramid-like diagram, see opposite. The ranking of the various waste management options is based on current scientific research on how the options would impact on the environment in terms of climate change, air quality, water quality and resource depletion.



Figure 1  
The Waste Hierarchy



## The Waste Hierarchy

2.7 This illustrates the principle that the top priority for waste is to prevent creating it in the first place, then it is re-use, recycled, recovered and finally disposed of (e.g. landfill). This is a spatial planning document so it does not directly concern itself with the prevention of waste but it does seek to manage waste in the highest levels possible.

## National Drivers

2.8 The Waste Management Plan for England (2013) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and the management of waste. To that effect, it encourages waste planning authorities to:

- Deliver sustainable and efficient facilities
- Consider waste management alongside other requirements such as transport, housing and jobs
- Ensure businesses and residents are engaged
- Drive waste up the Waste Hierarchy

2.9 The way that waste authorities need to delivery effective waste planning is to apply the principles of self-sufficiency and proximity (commonly referred to as the "proximity principle"). This, in theory, expects waste authorities to deal with their own waste but there is no expectation that each local authority should deal solely with its own waste and instead should strive for net self-sufficiency. However, planning over a larger area such as that covered by the South London Waste Plan boroughs does provide for a more strategic and sustainable approach to waste in this area.

## Regional Drivers

- 2.10 The regional driver for the South London Waste Plan is the Mayor of London through the London Plan. This plan takes the policies and targets for the Draft London Plan (July 2019) as the boroughs expect the waste section of the draft plan, at least, to be adopted.
- 2.11 The Draft London Plan reflects the general philosophy of the waste hierarchy as well as national guidance but, in informing the South London Waste Plan, it sets out how this should be achieved in London. In particular, the Draft London Plan reiterates the targets for waste management set out in the Mayor's London Environment Strategy (2018), namely:
- No biodegradable or recyclable waste to landfill by 2026
  - 65% of 'municipal' (household and business) waste recycled by 2030, comprising: 50% Locally Authority Collected Waste recycled by 2025; and 75% business recycled by 2030
  - 95% of construction, demolition and excavation waste to be recycled by 2020
- 2.12 The strategic approach and policies in the London Plan are based on the forecast amount of waste that needs to be planned for the "arisings". These are then transformed into apportionments for individual boroughs based on criteria on the scope of a borough to manage waste. These have informed this South London Waste Plan Issues and Preferred Options document and more information on the apportionments are set out in Section 4 (Policy WP1 and WP2).
- 2.13 In order to meet the apportionment and targets, the Draft London Plan requires boroughs to:
- Safeguard existing sites
  - Optimise the waste management capacity of existing sites
  - Provide new waste management sites where required
  - Optimise the waste management capacity of existing sites, and
  - Create environmental, social and economic benefits from waste and secondary materials management





## Local Drivers

2.14 The South London Waste Plan is driven by the need of the boroughs to meet their Draft London Plan targets and apportionments and the sustainable development aim to provide enough waste capacity to manage the waste the area generates.

2.15 To this end, in December 2018, the four boroughs commissioned waste planning consultants Anthesis to undertake a study of the boroughs existing capacity and likely future capacity. From this evidence, the following preferred strategy has been identified:

- Safeguard existing, operational waste sites
- Encourage the intensification of appropriate sites to meet the Construction and Demolition waste stream capacity shortfall
- Not plan for other waste streams as either the waste stream is so small as to be insignificant or the capacity is sufficient already



## The Sustainability Appraisal

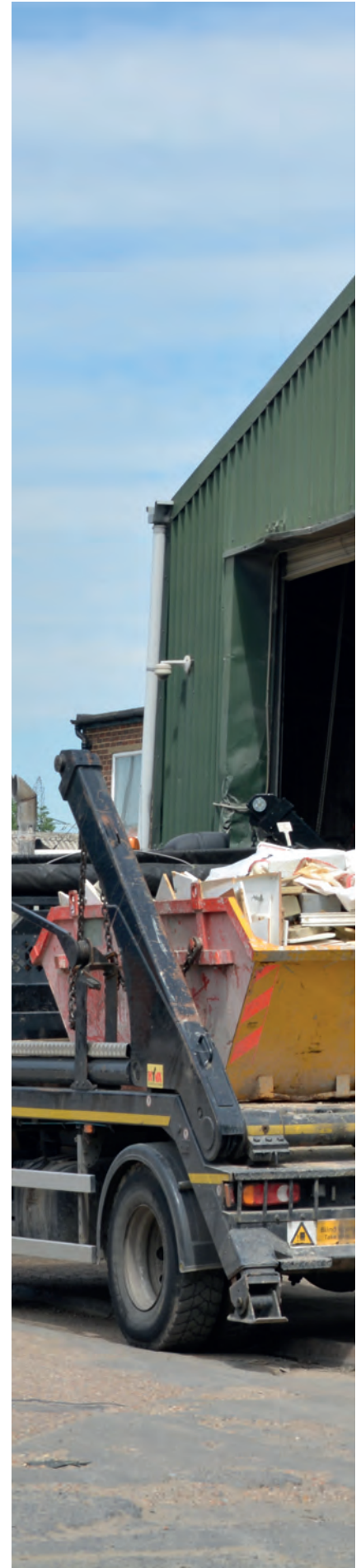
2.16 The purpose of a Sustainability Appraisal (SA) is to evaluate development policies and proposals through the integration of social, environmental and economic considerations into the preparation of the planning documents. The South London Waste Plan boroughs have already produced a Scoping Report setting out the sustainability issues and how they will be evaluated. A Sustainability Appraisal on the South London Waste Plan Issues and Preferred Options document has also been carried out and is also part of this consultation.

## Equalities Impact Assessment

2.17 At the next stage of the plan's preparation when policies and sites are more finalised, the South London Waste Plan boroughs will carry out an Equalities Impact Assessment to ensure the South London Waste Plan does not adversely affect members of socially excluded or vulnerable groups and to meet the partner boroughs' statutory duties.

## Duty to Cooperate

2.18 The Localism Act 2011 (Section 110) prescribes the "Duty to Co-operate" between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is "to engage constructively, actively and on an on-going basis" and must "maximise the effectiveness" of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on waste issues, particularly cross-boundary issues. This process is being undertaken as part of this South London Waste Plan Issues and Preferred Options consultation and will be ongoing through to the plan's adoption.





## Key Issues

- 3.1 Like the South London Waste Plan 2012, the development of the replacement South London Waste Plan must be informed by an up-to-date and proportionate analysis of the context of the plan area and the key issues and challenges facing it.
- 3.2 A full description of the partner boroughs' characteristics is available in the accompanying Sustainability Appraisal (SA) report. The SA includes an analysis of population demographics, employment, social deprivation and the provision of transport networks. It identifies the location of the boroughs' conservation areas, nature conservation areas and protected open space as well as areas at risk of flooding. These are all important factors when considering suitable locations for waste management facilities. The Sustainability Appraisal has been produced alongside the Issues and Preferred Options South London Waste Plan document and has influenced the Plan's production.
- 3.3 Evidence supporting the South London Waste Plan Issues and Preferred Options document has been produced by the consultancy Anthesis on behalf of the four boroughs. The draft South London Waste Plan Technical Report 2019 sets out key data on waste issues in south London and analyses it in the context of national policy, the published London Plan 2016 and the emerging draft London Plan 2017-2019. The SLWP Technical Report 2019 is published alongside this consultation
- 3.4 From local evidence, national and London's policy on waste, five key issues have been identified for the draft South London Waste Plan 2021-2036 to address.

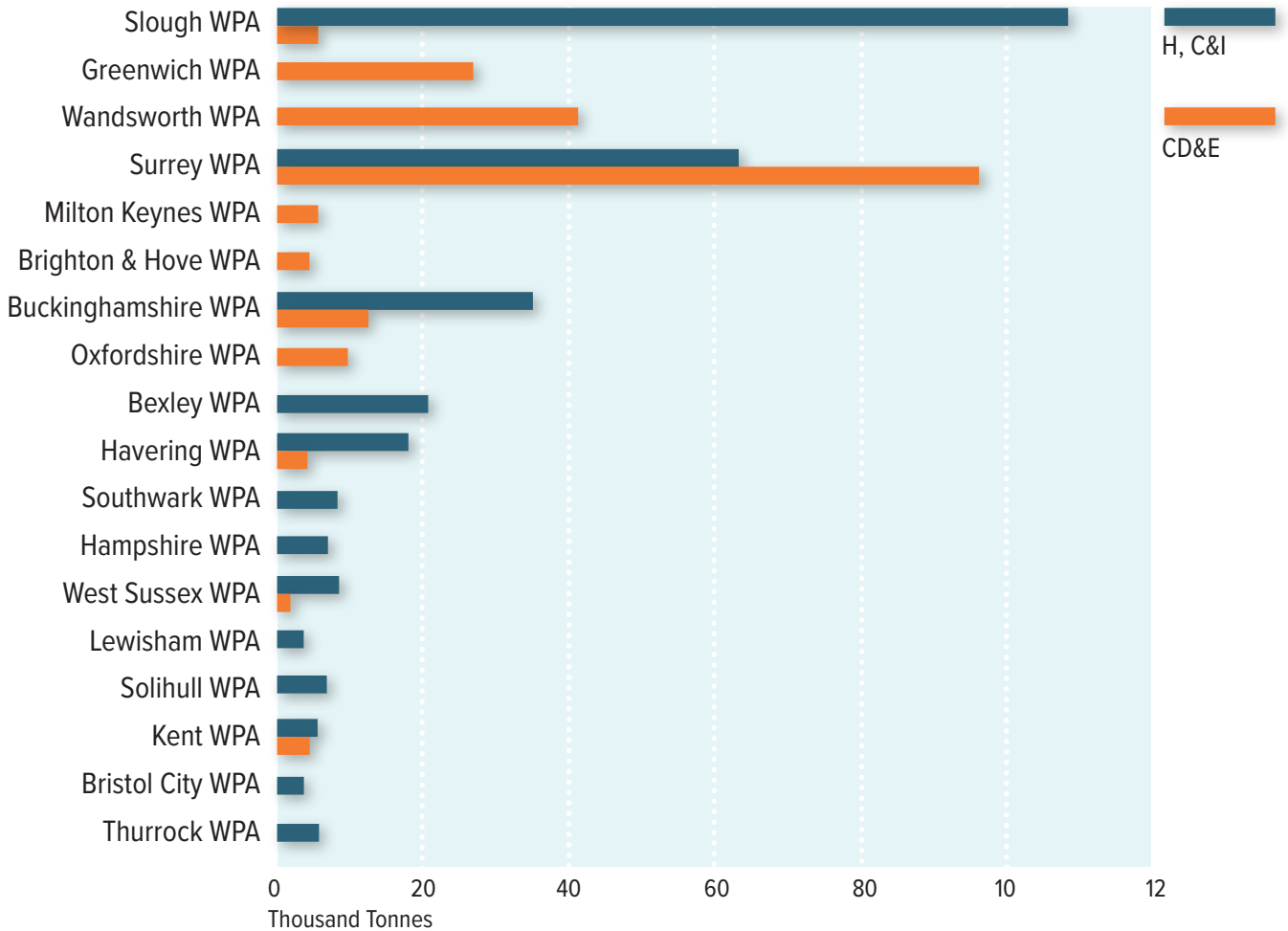
## Key Issue 1 Cross Boundary Issues

- 3.5 Waste is a strategic cross-boundary issue. Authorities have a legal "duty to co-operate" under the Localism Act to ensure that authorities work together on strategic issues such as plan-making for waste.
- 3.6 The Mayor's London Plan considers waste arising from households, businesses and other sources within London's boundaries and apportions an amount of this waste for each London borough to manage. However, different types of waste are managed in different facilities which often need a wide catchment to be economically viable so to achieve net self-sufficiency every area will have some waste imports and exports.



3.7 The South London Waste Plan Technical Report 2019 sets out in detail the last five years of exports and imports between the SLWP boroughs and other waste authorities.

Figure 2 South London Waste Plan Exports (tonnes) of Household, Commercial and Industrial (H, C&I) and Construction & Demolition (CD&E) Waste in 2017



3.8 The Technical Report Table 44 demonstrates that in 2017 approximately 300,000 tonnes of household and commercial and industrial waste was exported to be managed in other waste authorities. The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey WPA, with no one facility receiving more than 31,000 tonnes.

Figure 3 South London Waste Plan Imports and Exports of Waste Streams in 2017 (tonnes)

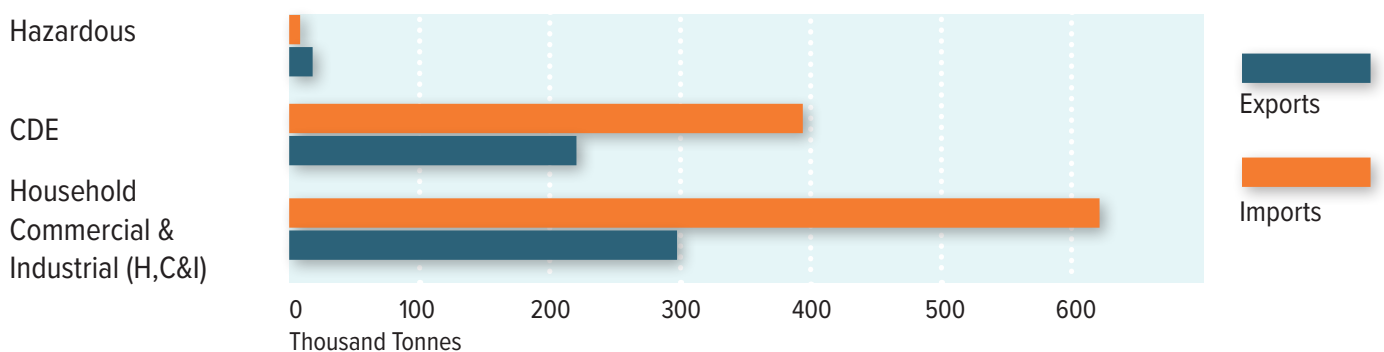


Figure 4 South London Waste Plan Imports of Household, Commercial & Industrial (H,C&I) Waste in 2017 (tonnes)

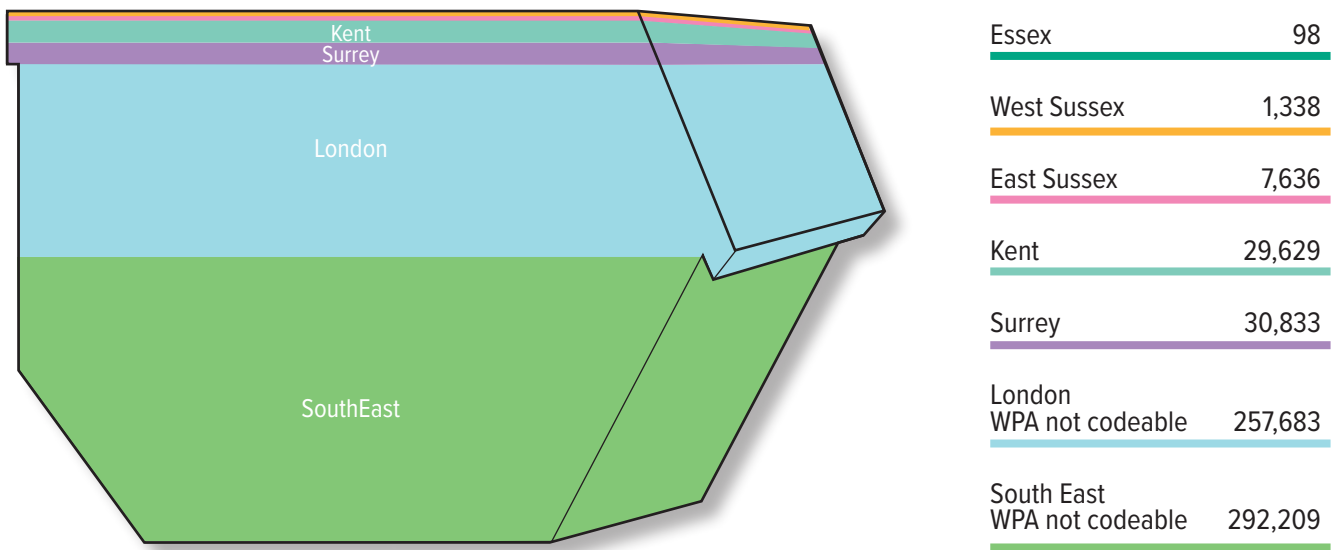
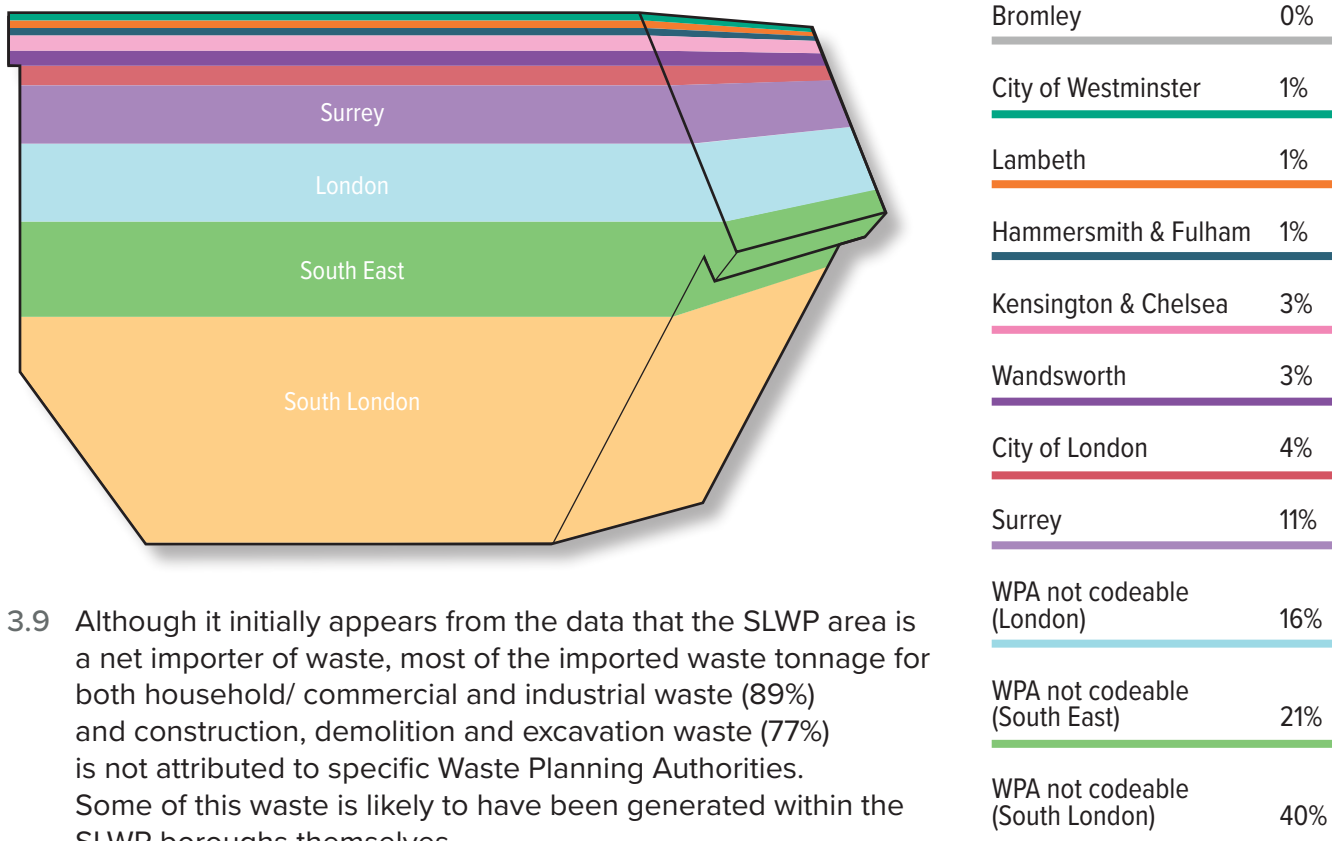


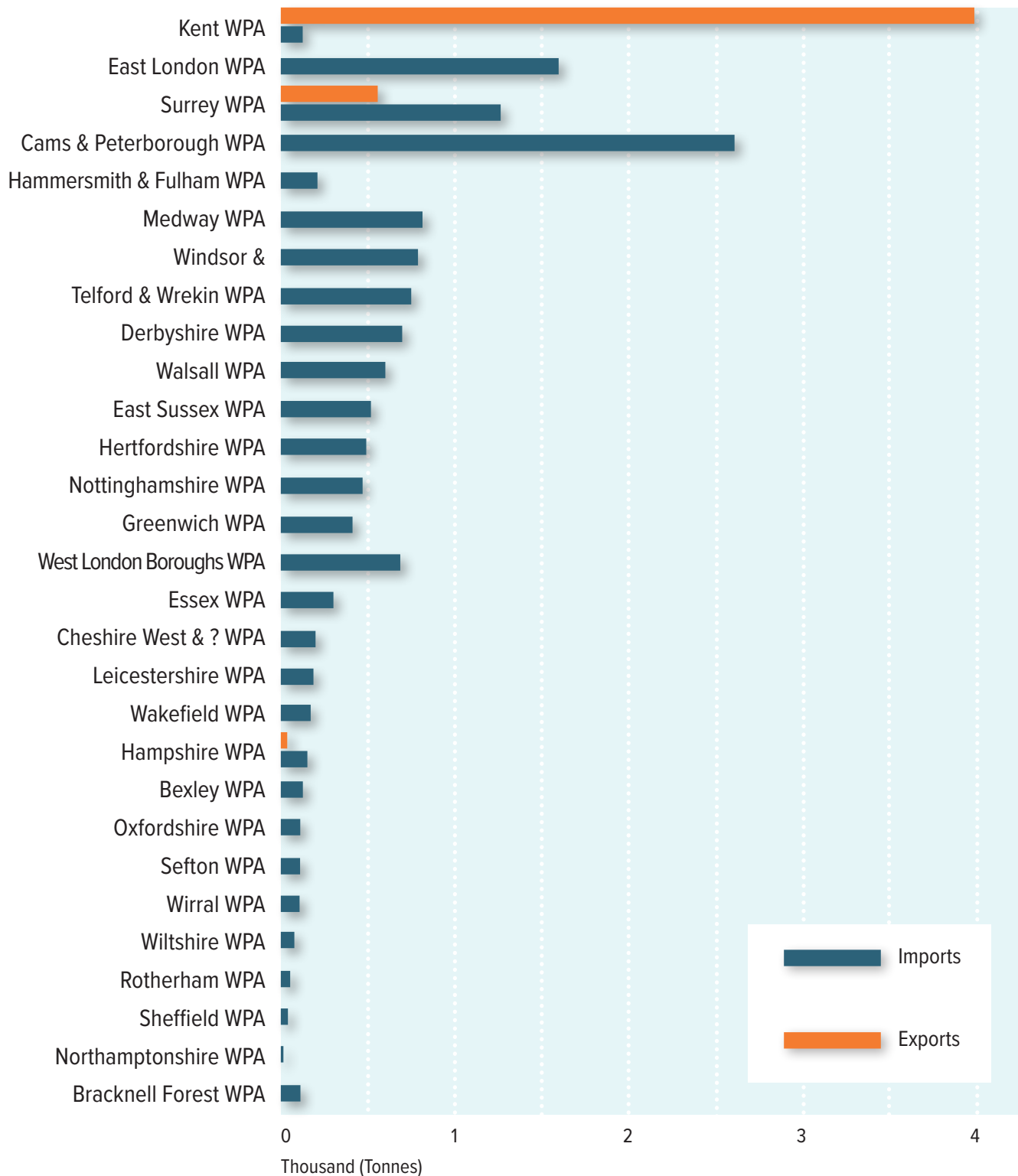
Figure 5 South London Waste Plan Imports of CD&E Waste in 2017 (tonnage)



3.9 Although it initially appears from the data that the SLWP area is a net importer of waste, most of the imported waste tonnage for both household/ commercial and industrial waste (89%) and construction, demolition and excavation waste (77%) is not attributed to specific Waste Planning Authorities. Some of this waste is likely to have been generated within the SLWP boroughs themselves.

3.10 Hazardous waste, such as from healthcare, oil, solvents and other building materials, requires specialist facilities for treatment and disposal so may travel further than other types of waste as there are fewer and more dispersed specialist facilities required to deal with the lower tonnages. South London is a net exporter of hazardous waste; in 2017 the SLWP exported 20,200 tonnes and imported 800 tonnes.

Figure 6 South London Waste Plan Imports and Exports of Hazardous Waste by Waste Planning Authority in 2017 (tonnes)



3.11 The task for the South London Waste Plan boroughs is to ensure that net self-sufficiency can be achieved and those facilities which receive South London waste are able to do so into the future.

## Key Issue 2 How much waste must the South London Waste Plan plan for?

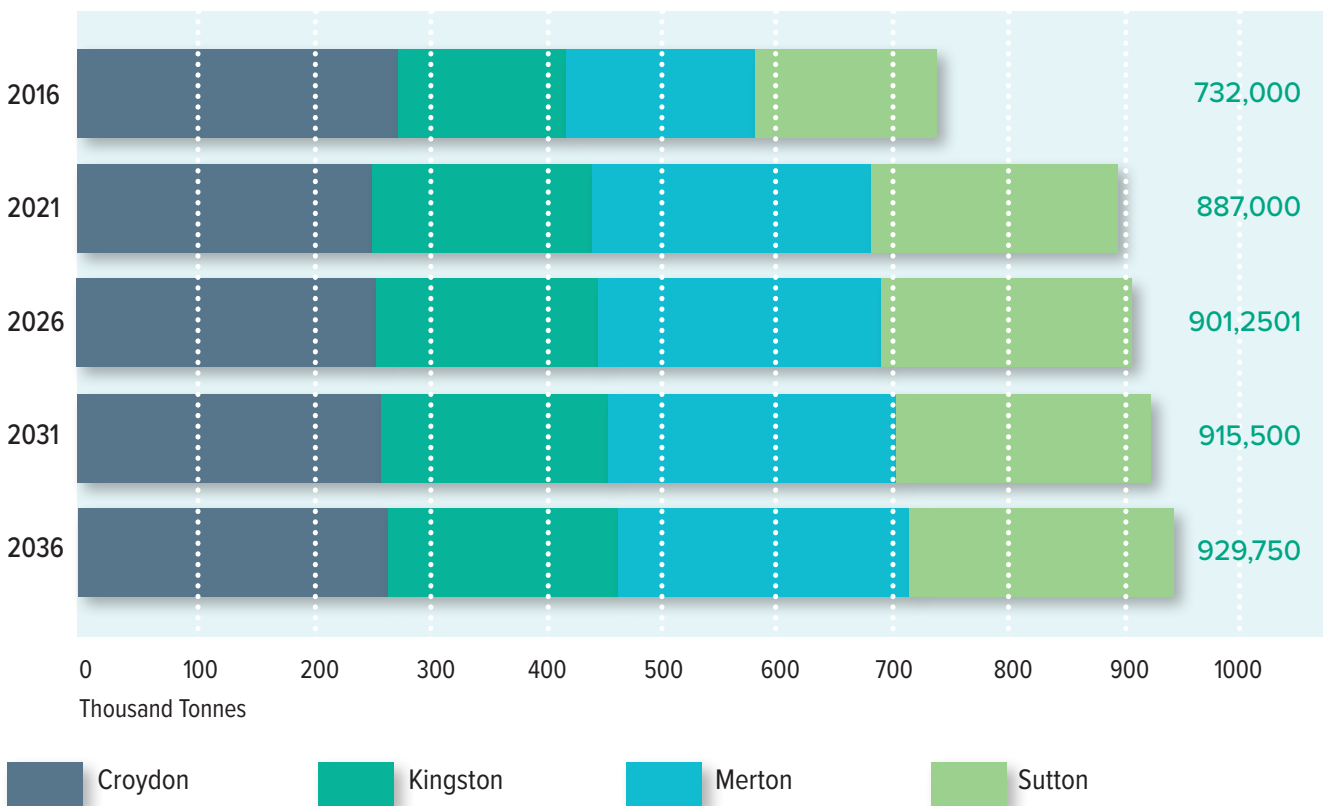
3.12 The National Planning Policy for Waste and the associated guidance requires waste planning authorities to plan for seven waste streams:

3.13 **Local Authority Collected Waste (LACW)**, also known as municipal or household waste: Waste collected by a Local Authority, including recycling, household and trade waste.

3.14 **Commercial/industrial:** non-hazardous waste produced by shops, businesses and industry.

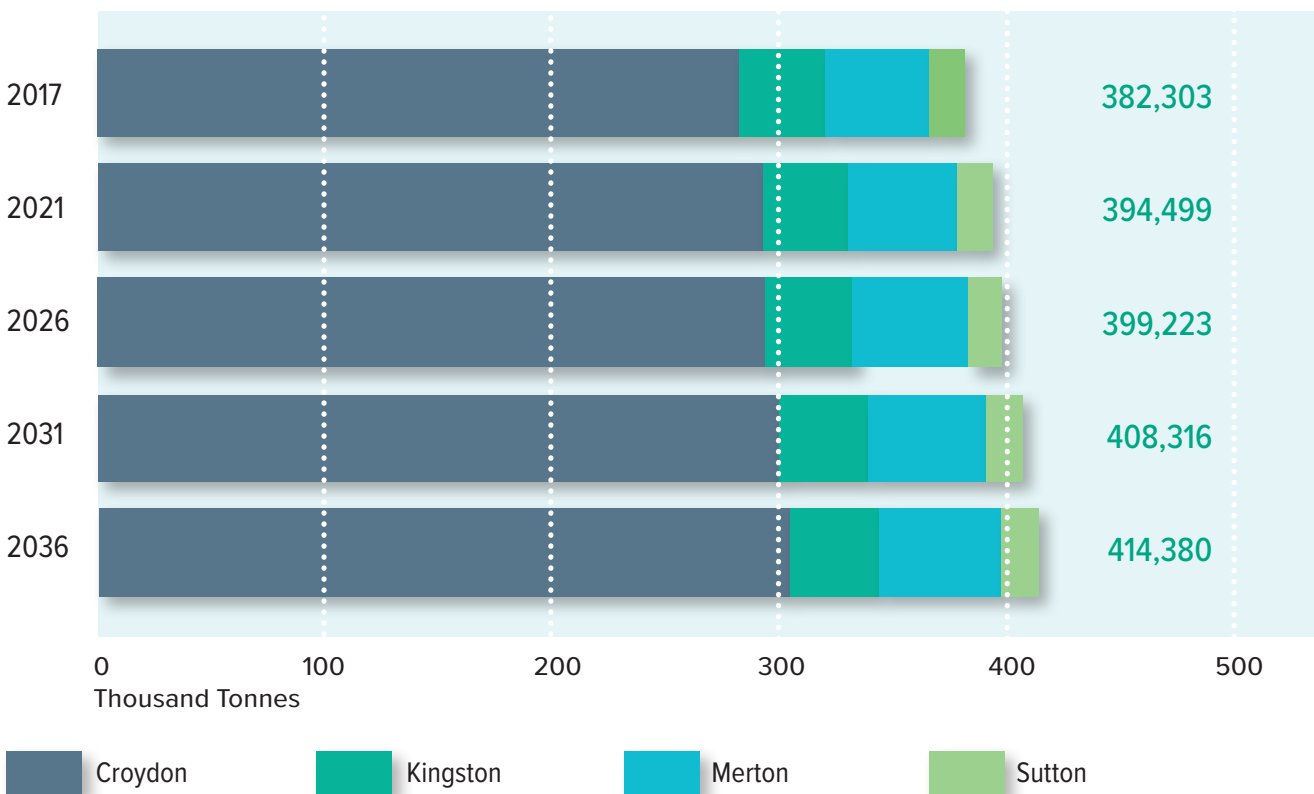
3.15 These two waste streams are collectively the largest amount of waste produced in the SLWP area; both make up the draft London Plan 2019 apportionment targets. Most of the boroughs within the SLWP area have been set apportionment targets higher than their anticipated waste arisings and collectively the apportionment is higher than the anticipated arisings. The South London Waste Plan Technical Report 2019 has therefore used the higher draft London Plan 2019 apportionment targets for each SLWP authority as a more accurate and up-to-date target of what has to be planned for. As set out in Figure 7 below, the South London Waste Plan boroughs must plan for facilities to manage a target of 929,750 tonnes of apportioned waste (Local Authority Collected Waste and Commercial and Industrial Waste) by 2036.

Figure 7 Household, Commercial & Industrial Waste Targets (tonnes)



**3.16 Construction, Demolition & Excavation:** soil, concrete, brick, plastic, wood and other waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures. This is the third largest waste stream and the amount of waste produced each year is highly influenced in London by the strength or weakness of London’s housebuilding and commercial property development market. The London Plan sets a target that London will recycle and re-use 95% of Construction and Demolition Waste by 2020. The London Plan excludes excavation from the net self-sufficiency target as it is to recycle this waste stream in a London context. The South London Waste Plan Technical Report 2019, chapter 4, sets out how the overall Construction and Demolition Waste arisings in the South London Waste Plan area has been forecast using GLA’s employment figures in the construction sector until 2036. By 2036 a total of 414,380 tonnes of Construction and Demolition waste should be managed in the South London Waste Plan area.

Figure 8 Construction and Demolition Waste Targets (tonnes)



**3.17 Other Waste Streams:** The other waste streams which the Government requires to be planned for are: Hazardous waste, Low Level Radioactive waste, Agricultural waste and Wastewater. However, as the text for Policy WP2 explains, there are either satisfactory arrangements in place, the waste stream is so small as to be insignificant or capacity improvements have already been made.

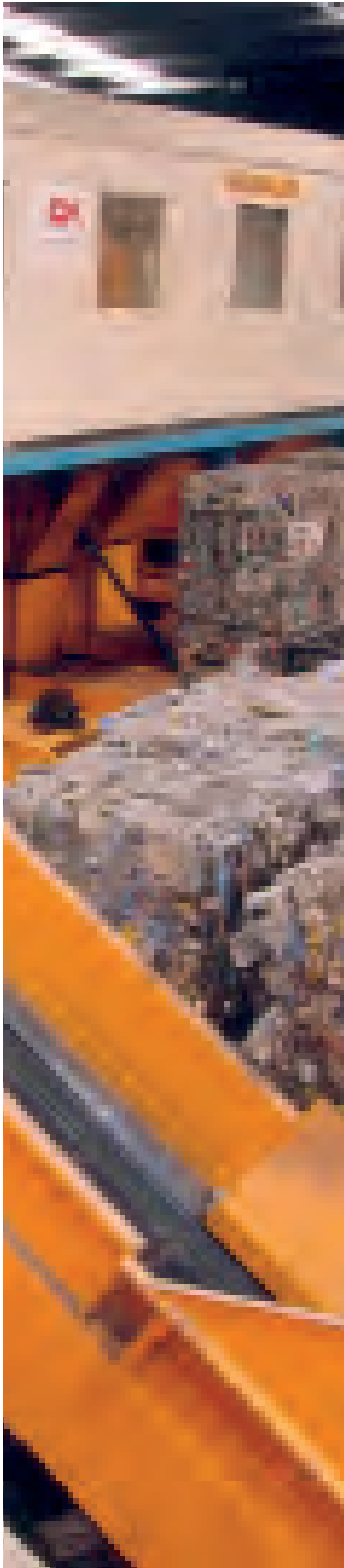
**3.18** The task for the South London boroughs is to provide sufficient capacity for those waste streams which will need additional capacity to meet their 2036 target.



## Key Issue 3: Scarcity of Land

- 3.19 In south London, any requirement for waste facilities must be considered and balanced against the land needs of other land uses.
- 3.20 The four SLWP boroughs may all see a substantial increase in their share of London's housing needs if the 2018 draft London Plan's housing targets are found sound. Each borough may need to plan for a substantial number for new homes, in some cases more than 200% additional homes than the current London Plan and with new housing comes the associated schools, healthcare, jobs and businesses and recreational areas that are essential to support a functioning city, a good quality of life and the sustainable development required by the National Planning Policy Framework. South London is also well known for its green and open spaces. Croydon, Kingston and Sutton all have Green Belt, which has some of the highest levels of planning protection from development and 33% of Merton is protected green space, such as Wimbledon and Mitcham Commons.
- 3.21 In the context of a huge increase in demand for land for new homes and associated infrastructure and the protection of green and open spaces, south London is also in demand for industrial land. Due to the shortage of available land for business and industry when compared with demand, the draft London Plan 2018 classifies Croydon, Kingston and Merton to retain their industrial capacity and Sutton to provide more capacity. In the context of the demand for scarce land from all sides, it will be necessary to plan sufficiently for waste within the SLWP boroughs and not sterilise industrial land for other uses with unnecessary waste designations.
- 3.22 Despite the difficulties, there are some positives that can be observed. The SLWP boroughs have worked together on the South London Waste Plan 2011-2021. During these 10 years sites for waste management have been delivered in accordance with the sites and areas set out in the SLWP 2012. Modern waste facilities are more efficient in their layout, processing capability and landtake. This means waste facilities take less industrial land than in recent years.
- 3.23 The task for the south London boroughs is to provide sufficient management capacity for waste uses but ensure that they do not stifle other land uses with high land demand.





## Key Issue 4: Waste Transfer Facilities

- 3.24 Given that the aim of the South London Waste Plan is to manage more waste within the plan's borders, thus supporting the Mayor of London's targets for greater self-sufficiency, and that logistics and travel is increasingly expensive, the need to transfer waste to facilities outside the plan area will change as more reuse, recycling and management facilities are developed. In practice, as set out in the South London Waste Plan Technical Report 2019 and based on Environment Agency data, most waste sites that operate mainly for the transfer of waste to other areas also have a waste management facility on-site, such as a bulking or materials recovery facility to assist with sorting and recycling.
- 3.25 Furthermore, there may be circumstances in which the transfer of waste remains an appropriate and desirable option. Examples set out in the South London Waste Plan Technical Report 2019 include the continuing transfer of hazardous waste to a small number of specialist treatment facilities outside London, or the transfer of waste to an existing recycling facility located in close proximity, but just outside the plan area's borders. Although the South London Waste Plan boroughs acknowledge that as much of their own waste as practicably possible should be managed within its boundaries, the South London Waste Plan should be sufficiently flexible to support transfer where waste cannot reasonably be treated within the plan area, or where the negative environmental impacts of doing so are greater than other options.
- 3.26 Transfer stations operated by waste management contractors tend to bulk collected wastes before transporting to other facilities for, for instance, landfilling, energy recovery or separation for recycling. As such this capacity does not count towards the London apportionment. However, many transfer stations do practise separation of recyclates from waste materials before they are bulked for onward transport. To properly recognise this additional recycling activity, the South London Waste Plan Technical Report 2019 has used Environment Agency data for five years to 2017 to produce an average recycling rate practiced within the waste transfer facility. The average recycling rate has then been counted towards the apportionment target and not as waste transfer. As the costs of materials and travel rise (particularly in London via initiatives such as the Ultra Low Emissions Zone expansion) this will further support the circular economy approach and result in a greater financial imperative to reduce waste and reuse waste materials.
- 3.27 The task for the South London boroughs is to encourage more reuse and recycling on waste transfer stations.

## Key Issue 5: Climate Change, the End of Landfill and the Circular Economy

- 3.28 As started by the South London Waste Plan 2011, the South London Waste Plan Issues and Preferred Options proposes to reduce the reliance on disposal to landfill sites both within the plan area and outside London. Therefore, this South London Waste Plan Issues and Preferred Options document proposes:
- Not to safeguard the Beddington Farmlands landfill site as it is due to close in 2023 and its waste will be managed higher up the waste hierarchy as other recovery rather than disposal
  - To seek to reduce the amount of Construction and Demolition Waste going to landfills in Surrey.
- 3.29 Tackling climate change is a key Government priority for the planning system and a driver for all South London Waste Plan boroughs. The South London Waste Plan boroughs are all focused on the challenges posed by climate change and are driven by the requirements to mitigate and adapt to the effects of climate change. While it is recognised that waste management facilities will continue to generate CO2 emissions, the Draft London Plan 2018 requires major development, such as new waste facilities, to be net zero carbon and this is a key issue for the South London Waste Plan
- 3.30 The South London Waste Plan boroughs support The Mayor's Environment Strategy 2019 and draft London Plan 2018 proposals to move towards a circular economy, to keep products and materials circulating within the economy at their highest value for as long as possible. Leasing, sharing, reusing, repairing and re-manufacturing products - from lawnmowers to window glass – has been identified as having a positive impact on businesses, jobs and the economy as well as reducing waste. London and other cities are prime locations for moving from a linear to a circular economy due to the expense and traffic pollution incurred in transferring goods. Activities are taking place in South London boroughs to move towards a more circular economy include the reuse of materials recovered from extensive building demolition that might previously have ended up as Construction, Demolition and Excavation waste.
- 3.31 The tasks for the South London boroughs is to continue their work to reduce the amount of waste going to landfill, make major waste developments zero carbon, make minor waste developments as close to zero carbon as possible and finally provide opportunities for the circular economy to expand.





## Vision and Objectives

- 4.1 The key issues identified in the previous chapter have informed the four South London Waste Plan boroughs vision and objectives for the South London Waste Plan and these are set out below:

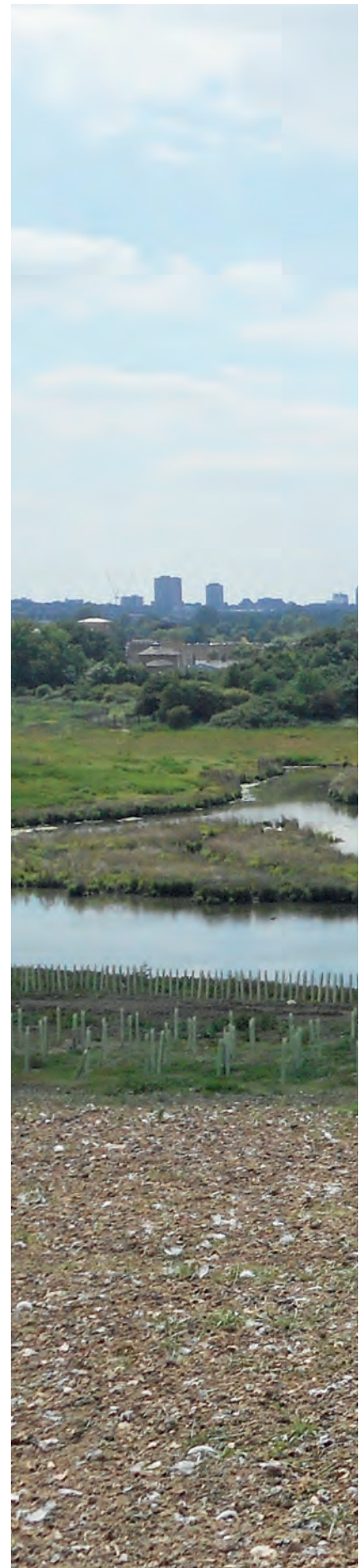
By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient in terms of waste generation and waste management for all types of waste. In addition, the South London Waste Plan area will be playing its part in managing London's Household and Commercial and Industrial Waste within the capital's boundaries.

The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated as far as it is possible to do so. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates.

**Question Vision** Do you agree with the draft Vision?

- 4.2 To achieve this vision, the South London Waste Plan has the following objectives:
- Meet the Draft London Plan target for Household and Commercial and Industrial Waste
  - Meet the identified needs for Construction and Demolition Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.
  - Safeguard existing waste sites to meet these targets and needs on existing sites
  - Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates
  - Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity
  - Ensure the effects of new development are mitigated and, where possible, enhance amenity

**Question Objectives** Do you agree with the draft Objectives?





## WP1 Strategic Approach to Household and Commercial and Industrial Waste

### London Plan Arisings and Apportionment Targets

5.1 The boroughs' targets for Household and Commercial and Industrial Waste are set by the Mayor of London and the boroughs are using the Draft London Plan (July 2019) waste arisings and apportionment targets as these are the most up-to-date targets. The Mayor forecasts the amount of Household Waste produced by a borough as follows:



5.2 The amount of Commercial and Industrial Waste produced by a borough is calculated as follows:



5.3 However, the Mayor of London then redistributes portions of the borough arisings between boroughs, giving those boroughs he considers to have more scope to manage waste a higher waste management target (or apportionment) and those he considers has less scope to manage waste a lower waste management target. The Mayor used the following criteria for apportioning or redistributing waste between boroughs: existing waste facilities and industrial land, arisings in a borough, presence of railheads and wharves, proximity to major routes, restrictive land designations (such as heritage or biodiversity), flood risk and socio-economic factors. The South London Waste Plan boroughs objected to these criteria at the Draft London Plan Examination-in-Public on the grounds that the criteria did not take account of whether industrial land was vacant or occupied and the socio-economic factors were unfounded (see [https://www.london.gov.uk/sites/default/files/m69\\_rb\\_kingston\\_2607\\_lb\\_croydon\\_5622\\_lb\\_merton\\_2565\\_lb\\_sutton\\_2044.pdf](https://www.london.gov.uk/sites/default/files/m69_rb_kingston_2607_lb_croydon_5622_lb_merton_2565_lb_sutton_2044.pdf)).

5.4 The Mayor of London’s arisings and apportionment targets for the South London Waste Plan boroughs are set out in Figure 11.

Figure 11 Arisings and Apportionment at 2021 and 2036 (tonnes per annum)

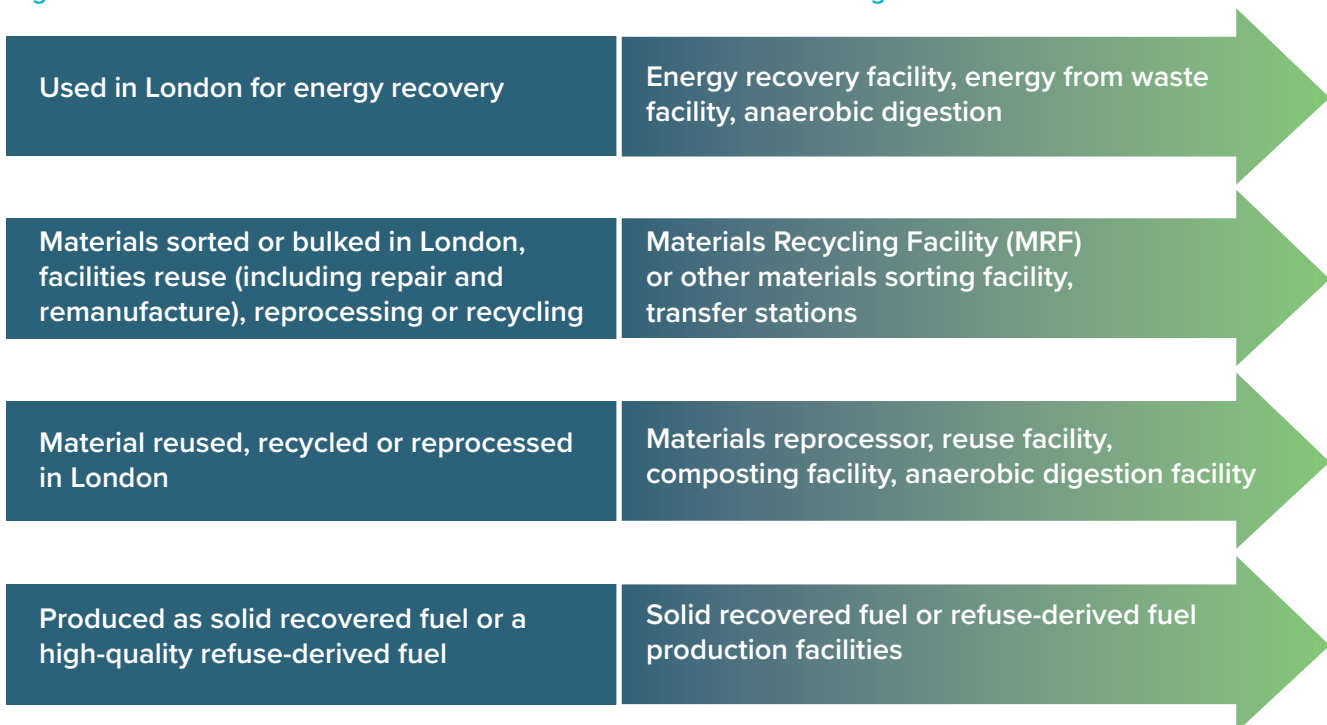
	2021		2036	
	Arisings	Apportionment	Arisings	Apportionment
Croydon	305,000	252,000	320,000	264,000
Kingston	152,000	187,000	157,000	196,000
Merton	173,000	238,000	180,000	249,250
Sutton	161,000	210,000	168,000	220,500
<b>TOTAL</b>	<b>791,000</b>	<b>887,000</b>	<b>825,000</b>	<b>929,750</b>

5.5 In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generate.

**Existing Capacity**

5.6 Appendix 1 shows the existing capacity for waste management across the four South London Waste Plan boroughs. The figures have been calculated by Anthesis consultants for the four boroughs and what constitutes waste management and what sort of facilities provide waste management are set out in Figure 12.

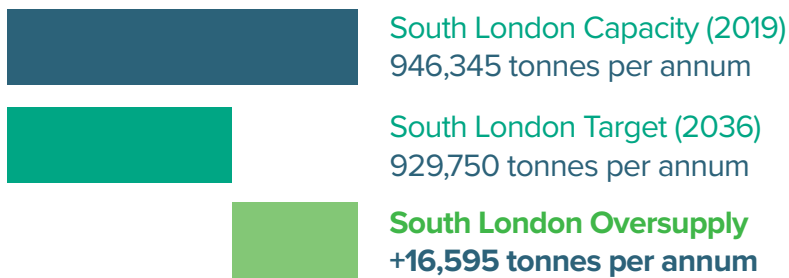
Figure 12 Processes and Facilities which Contribute to Waste Management





5.7 Appendix 1 also shows that the current existing capacity for Household and Commercial and Industrial Waste is sufficient to meet the Mayor's apportionment, with the figures reproduced in Figure 13.

**Figure 13 Capacity, Target and Oversupply for Household and Commercial and Industrial Waste**



### Approach to Meeting the Target

- 5.8 Since the four South London Waste Plan boroughs have sufficient waste management capacity to meet their 2036 target, it is proposed to safeguard the existing sites and allow the intensification of the existing sites where appropriate. Unlike the previous South London Waste Plan, the sufficient existing capacity means that the boroughs have no need to identify additional sites for waste management and no need to identify areas which may be suitable for waste management. As all the boroughs have a high demand in their industrial areas for other employment-generating uses, this is especially important for the South London Waste Plan boroughs. With industrial land in high demand, the South London Waste Plan boroughs do not want to be sterilising sites in industrial areas from other employment uses by unnecessarily designating waste sites.
- 5.9 Therefore, in accordance with Paragraph 3 of the National Planning Policy for Waste (which requires local authorities to plan for waste) the Draft London Plan (July 2019) apportionment targets and this plan's objectives:

#### **WP1 Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste**

- The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.
- During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the Draft London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036.
- The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging intensification of these sites as appropriate (see Policy WP3).
- New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).

**Question WP1** Do you agree with Policy WP1?


## WP2 Strategic Approach to Other Forms of Waste

5.10 In addition to Household and Commercial and Industrial Waste, the Planning Practice Guidance (Paragraph 013 Reference ID: 28-013-20141016) also requires local authorities to plan for Construction and Demolition Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.

### Construction and Demolition Waste

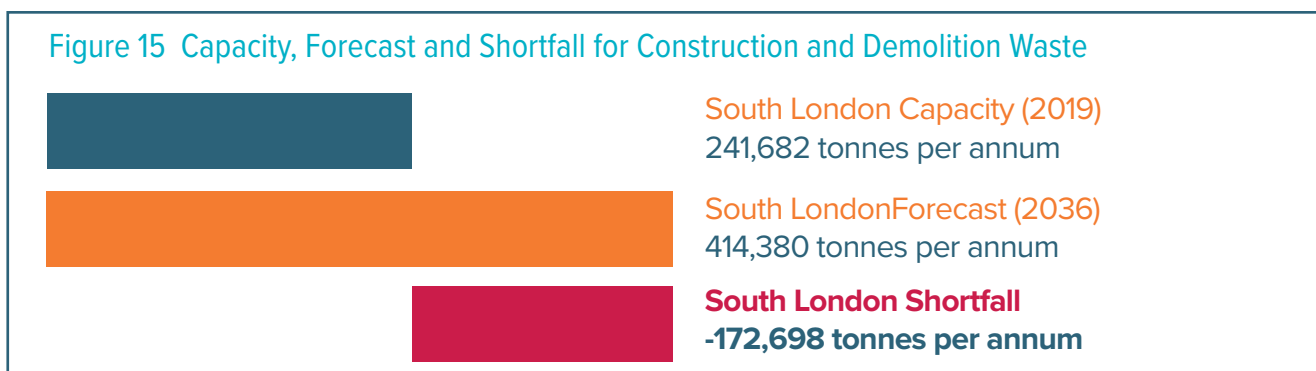
- 5.11 Construction and Demolition Waste is mainly made up of soils, stone, concrete, brick and tile although other waste, such as wood, metals, plastic and cardboard can be found in the waste stream as well. The data regarding Construction and Demolition Waste is poor. Arisings are calculated by employment forecasts for the construction industry, which can be highly susceptible to fluctuations as a result of the health or otherwise of the regional and national economy. Capacity is also difficult to measure as it is suspected that a lot of the recycling or reuse of Construction and Demolition waste takes place on the construction site itself or at waste management facilities with exemptions from Environment Agency permits.
- 5.12 Nevertheless, consultants Anthesis have produced a forecast of Construction and Demolition Waste for the South London Waste Plan boroughs and this is set out in Figure 14.

Figure 14 Construction and Demolition Waste Arisings and at 2021 and 2036 (tonnes per annum)



	2021 Arisings	2036 Arisings
Croydon	292,970	304,695
Kingston	37,887	39,040
Merton	47,975	54,038
Sutton	15,667	16,607
<b>TOTAL</b>	<b>394,499</b>	<b>414,380</b>

5.13 Appendix 1 shows the existing capacity across the four South London Waste Plan boroughs for Construction and Demolition waste management and it shows there is a shortfall not only for the 2036 forecast but also for the 2021 forecast. The exact figures are set out in Figure 15.



5.14 The South London Waste Plan boroughs consider that the shortfall could easily be remedied on the existing safeguarded sites because:

- The throughput for many of the facilities which manage Construction and Demolition Waste does not count towards the waste management totals (because they are primarily involved in waste transfer operations); and/or
- These sites are significantly underutilising their potential capacity.

5.15 Figure 16 shows the waste facilities which manage Construction and Demolition Waste and how they are underperforming.

Figure 16 Construction and Demolition Waste Facilities and Throughput Potential (tonnes per annum)

Site	Maximum	Licence	Throughput counting towards Apportionment
<b>C1</b> Able Waste Services	46,463	74,999	43,268
<b>C4</b> Days Aggregates	179,300	249,999	0
<b>C5</b> Factory Lane Waste Transfer Station*	19,736	200,000	5,206
<b>M1</b> B&T@Work	3,729	5,000	0
<b>M6</b> George Killoughery	71,253	74,999	0
<b>M7</b> LMD Waste Management	24,999	74,999	20,774
<b>M8</b> LMD Waste Management	38,738	50,000	33,845
<b>M9</b> Maguire Skips	58,150	74,999	0
<b>M10</b> Maguire Skips	53,313	74,999	42,856
<b>M11</b> Morden Transfer Station	39,950	74,999	0
<b>M12</b> NJB Recycling	48,687	75,000	18,030
<b>M13</b> One Waste Clearance*	20,000	75,000	4,547
<b>M14</b> Reston Waste Transfer and Recovery	71,595	74,999	30,131
<b>M17</b> UK and European (Ranns) Construction	804	75,000	0
<b>S1</b> 777 Recycling Centre*	56,912	372,600	32,972
<b>S5</b> Hinton Skips*	8,000	75,000	1,819
<b>S8</b> King Concrete	1,060	74,999	0
<b>S9</b> Premier Skip Hire*	12,000	75,000	2,728
<b>S10</b> Raven Recycling	15,224	74,999	5,506
<b>TOTAL</b>	<b>769,913</b>	<b>1,927,590</b>	<b>241,682</b>

\* Also manages Household and Commercial and Industrial Waste, which counts towards that apportionment



5.16 Figure 15 shows the 172,698 tonnes per annum shortfall at 2036 could be easily eradicated if some of the sites refocused their operations from transfer to management and processed to their maximum throughput achieved over the past five years. Similarly, the shortfall for Construction and Demolition waste management could also be eradicated if some of the facilities processed waste at volumes close to their licensed capacities. The South London Waste Plan boroughs are aware that not all sites will be able to intensify but the boroughs consider there is scope on some of 19 sites in Figure 8 to remove the shortfall. There is also the possibility that market forces may incentivise some waste facilities currently providing the overcapacity in the Household, Commercial and Industrial Waste stream to switch to Construction and Demolition Waste.

### Low Level Radioactive Waste

5.17 Low Level Radioactive Waste commonly occurs in paper, plastics and scrap metal that have been used in hospitals, research establishments and the nuclear industry. There are currently no specific facilities for processing such waste within the South London Waste Plan area. Within the area, there are 10 organisations with permits to keep and use radioactive facilities. According to the Pollution Inventory Dataset (2017), only seven are active in the keeping and using of Low Level Radioactive Waste and all are hospitals or medical research establishments. Most Low Level Radioactive Waste is in the form of dust which can be washed off and therefore, these hospitals and research establishments have permits to discharge small amounts of permitted radioactive wastewater to the sewer. There are no solid transfers of this type of waste in any of the facilities. Therefore, this evidence places no requirement on the South London Waste Plan boroughs to provide for solid waste management infrastructure.


### Agricultural Waste

5.18 The Waste Data Interrogator identified that only 383 tonnes of agricultural waste was generated in the South London Waste Plan boroughs in 2017. Given the relatively small tonnage of this waste, the fact that it can be mixed with Commercial and Industrial Waste and Construction and Demolition Waste and that it is often dealt with by Commercial and Industrial and Construction and Demolition waste facilities, there is no need for the South London Waste Plan boroughs to provide for this waste stream.

## Hazardous Waste

5.19 Hazardous waste is categorised as waste which is harmful to human health either immediately or over a period of time. Typically, hazardous waste can include asbestos, chemicals, oil, electrical goods and healthcare waste. All hazardous waste has to be treated in specialist facilities and so often this waste may travel further than non-hazardous waste to reach the appropriate specialist facility. Figure 17 shows the hazardous waste arisings in the South London Waste Plan area, which are already counted within the Commercial and Industrial and Construction and Demolition waste streams. Given that the waste generation in South London is small, its projected increase is small and that the small quantity of waste is already being managed by specialist facilities outside the area, there is no requirement on the South London Waste Plan boroughs to provide any hazardous waste treatment facilities

Figure 17 Hazardous Waste Arisings and at 2021 and 2036 (tonnes per annum).

		2021 Arisings	2036 Arisings
	<b>Croydon</b>		9,008
<b>Kingston</b>		2,404	2,432
<b>Merton</b>		4,591	4,685
<b>Sutton</b>		5,239	5,303
<b>TOTAL</b>		<b>21,242</b>	<b>21,612</b>

## Wastewater

5.20 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and manages the sewerage infrastructure as well as the sewage treatment works. Figure 18 shows Thames Water's relatively small projected increase in wastewater treatment and sludge volume between 2020 and 2035.

Figure 18 Wastewater and Sludge Generation at 2020 and 2035

	2020		2035	
	Wastewater treated (m <sup>3</sup> /year)	Sludge (total dissolved solids/year)	Wastewater treated (m <sup>3</sup> /year)	Sludge (total dissolved solids/year)
<b>Croydon</b>	11,179,842	6,309	11,570,942	6,552
<b>Kingston</b>	10,938,459	5,429	11,378,691	5,666
<b>Merton</b>	9,657,944	5,685	10,240,412	6,059
<b>Sutton</b>	21,113,960	11,547	22,545,500	12,366
<b>TOTAL</b>	<b>52,890,205</b>	<b>28,970</b>	<b>55,735,545</b>	<b>30,643</b>

5.21 The four boroughs are served by Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works. Thames Water has informed the South London Waste Plan boroughs that these works all have adequate capacity to manage the incoming sewage and have all had major capacity increases recently. Between 2020 and 2025, Thames Water plans general capital maintenance projects and, specifically at the Hogsmill Sewage Treatment Works, biodiversity enhancements and a replacement to the combined heat and power plant.

5.22 Therefore, in accordance with national planning practice guidance, the Draft London Plan (July 2019) and this plan's objectives:

### WP2 Strategic Approach to Other Forms of Waste

- (a) Development that results in the intensification of existing sites to provide additional Construction and Demolition waste management capacity will be supported, subject to Policy WP3(b).
- (b) New sites (either transfer or management) for Construction and Demolition waste should be for compensatory provision only (see Policy WP3).
- (c) New sites (either transfer or management) will not be supported for radioactive waste, agricultural waste and hazardous waste.
- (d) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be supported, subject to the other policies in this South London Waste Plan plan and the relevant borough's Development Plan.



**Question WP2** Do you agree with Policy WP2?

## WP3 The Safeguarding of Existing Waste Sites

### Safeguarding

5.23 In order to preserve the existing capacity, the South London Waste Plan boroughs will safeguard all the existing waste sites, set out on Pages 42-90, for waste uses and these will be shown on the boroughs' Policies Map.

### Intensification on Safeguarded Sites

5.24 In order to meet the shortfall against Construction and Demolition target and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. However, this will have to be considered against all the relevant policies in a borough's Development Plan. For example, while a redevelopment to increase capacity may be desirable in terms of meeting the target, it may not be desirable with regard to the additional strain that is placed on the local road network. Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the policies in a borough's Development Plan.



### Compensatory Provision

5.25 The Draft London Plan (July 2019) states that “waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used, where this is not available potential capacity of the site should be appropriately assessed” (paragraph 9.9.2). However, this approach may not be effective for the South London Waste Plan area, where industrial land is in high demand. Firstly, it means that a borough outside the South London Waste Plan area can encourage a waste facility to relocate in the South London Waste Plan area, thereby effectively transferring its waste apportionment to the South London Waste Plan area and making the four boroughs a “waste dumping ground”. With the London Plan industrial land forecasts, the South London Waste Plan boroughs do not have the capacity to provide compensatory provision for other boroughs. Secondly, the compensatory provision of the maximum throughput achieved over the last five years is too prescriptive and, in the experience of the South London Waste Plan boroughs, is difficult to implement as there may be other factors as to why the maximum throughput cannot be achieved on a compensatory site, such as site limitations or new contract arrangements. The South London Waste Plan boroughs consider that the amount of compensatory provision for a lost waste site is best considered on a case-by-case basis.

## Waste Hierarchy

5.26 Planning Practice Guidance (Paragraph: 009 Reference ID: 28-009-20141016) states that “driving waste up the Waste Hierarchy is an integral part of the national waste management plan for England and national planning policy for waste. All local planning authorities must have regard to the Plan and national policy in preparing their Local Plans.” In other words, this entails ensuring waste that can be recycled is not used as fuel, ensuring waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of a waste facility means waste operations cannot easily rise up the waste hierarchy be re-used is not recycled and, in the first place, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of waste facility means waste operations cannot easily rise up the waste hierarchy by intensification. The boroughs will attempt to adhere to national and regional guidance but will implement it flexibly on a case-by-case basis.



5.27 Therefore, in accordance with this plan’s objectives:

### WP3 Existing Waste Sites

#### Safeguarding

- (a) The sites set out on Pages 42-90 of this South London Waste Plan will be safeguarded for waste uses only.

#### Intensification

- (b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough’s Development Plan.

#### Safeguarding Compensatory Provision

- (c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis.
- (d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.

#### Safeguarding Waste Hierarchy

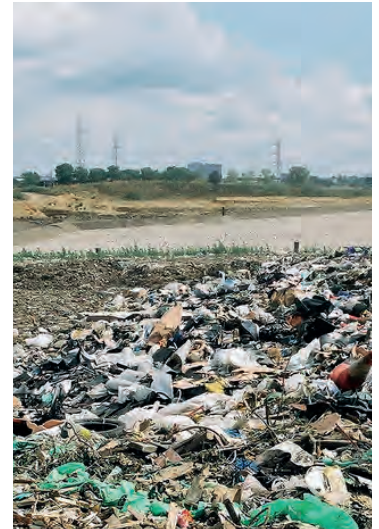
- (e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.

**Question WP3** Do you agree with Policy WP3?



## WP4 Sites for Compensatory Provision

- 5.28 As set out in Policy WP1, the South London Waste Plan expects no new sites for waste use except where they are required for compensatory provision. The location of compensatory sites must be carefully considered.
- 5.29 Policy SI18 of the Draft London Plan (July 2019) suggests that Strategic Industrial Locations and Locally Significant Industrial Locations are suitable locations, while Appendix B of the National Planning Policy for Waste (October 2014) provides further information on locational criteria for waste treatment facilities.
- 5.30 Therefore, in accordance with the National Planning Policy for Waste, the Draft London Plan and this plan's objectives:

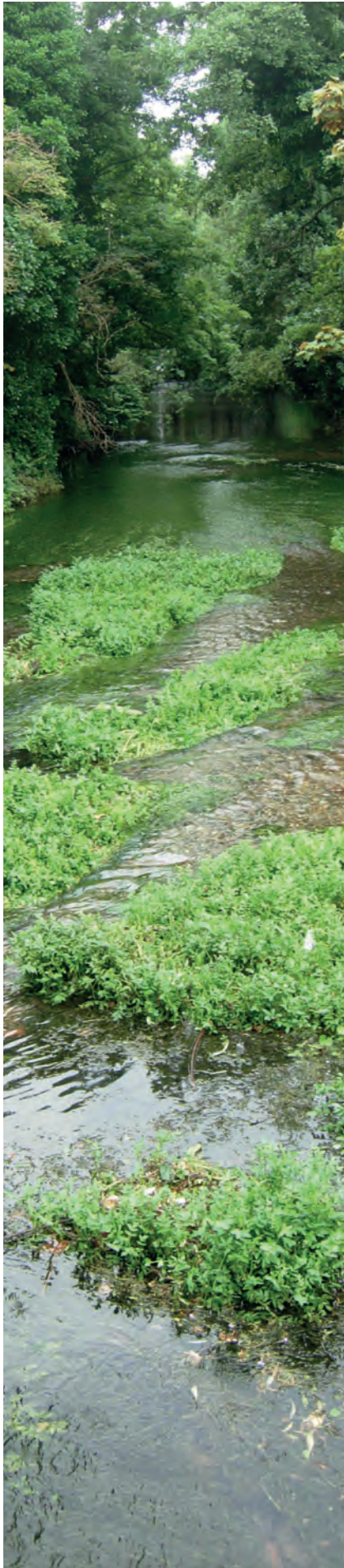


### WP4 Sites for Compensatory Provision

Proposals for new waste sites to provide compensatory provision should:

- (a) Demonstrate that the site is capable of providing sufficient compensatory capacity.
- (b) Be located on sites:
  - (i) within Strategic Industrial Locations or Locally Significant Industrial Locations;
  - (ii) not having an adverse effect on nature conservation areas protected by international or national regulations;
  - (ii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and,
  - (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b.
- (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area;
- (d) Have particular regard to sites which:
  - (i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or Metropolitan Open Land);
  - (ii) are located more than 100 metres from open space;
  - (iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);
  - (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;
  - (v) have direct access to the strategic road network;
  - (vi) have no Public Rights of Way crossing the site;
  - (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views;
  - (viii) offer opportunities to accommodate various related facilities on a single site;
- (e) Include appropriate mitigation measures which will be considered in assessing site suitability;
- (f) Meet the other policies of the relevant borough's Development Plan.

**Question WP4** Do you agree with Policy WP4?



## WP5 Protecting and Enhancing Amenity

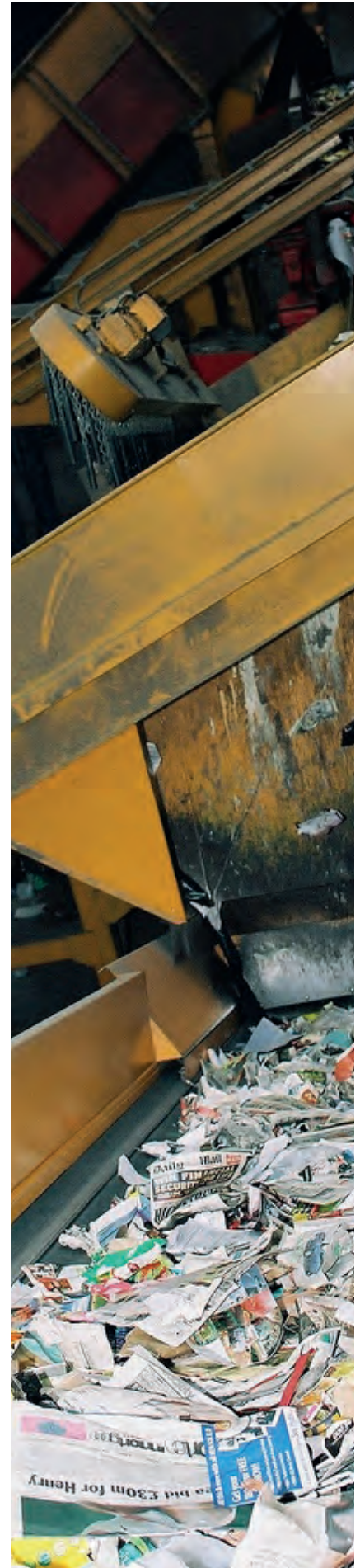
- 5.31 Waste facilities have the potential to generate a large number of amenity issues especially in an area as diverse as the plan area which includes urban, suburban and semi-rural built environments. The issues include effects on the built and historic environment, encroachment into open space, flood risk, harm to biodiversity, water quality and unacceptable emissions into the air (both from the plant itself and the traffic movements generated), unacceptable noise and vibration (both from the plant and traffic), litter and vermin and bird population increase.
- 5.32 Waste developments should be well designed and managed to ensure that amenity impacts can be mitigated or prevented. These may be addressed on an ongoing basis through conditions imposed by planning permissions that are granted by planning authorities and environmental permits that are regulated by the Environment Agency. The National Planning Policy for Waste (Paragraph 7) directs waste planning authorities to “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced”
- 5.33 The National Planning Policy Guidance (Paragraph: 050 Reference ID: 28-050-20141016) advises planning authorities that “before granting planning permission they will need to be satisfied that these issues can or will be adequately addressed by taking the advice from the relevant regulatory body.” Consequently, in the consideration of waste facility applications, each borough will seek advice from the Environment Agency and other agencies as appropriate. In addition, developers are encouraged to contact the appropriate partner borough, the Environment Agency and Natural England prior to submission of an application to discuss all relevant matters and to engage in early public consultation on a proposal.
- 5.34 Waste developments should be designed paying particular attention to how the design of a facility can enhance the local environment and mitigate amenity issues. For instance, waste activities should be within a fully enclosed and covered building and the impact may be further limited by considering setting, hard and soft landscaping, height, bulk and massing, detailing, materials, lighting and boundary treatments.
- 5.35 Therefore, in accordance with the National Planning Policy for Waste and this plan’s objectives:

### WP5 Protecting and Enhancing Amenity

- (a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.
- (b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.
- (c) Particular regard will be paid to the impact of the development in terms of:
- (i) The Green Belt, Metropolitan Open Land, recreation land or similar;
  - (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;
  - (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
  - (iv) Groundwater, surface water and watercourses;
  - (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;
  - (vi) Noise and vibration from the plant and traffic generated;
  - (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network;
  - (viii) Odour, litter, vermin and birds; and,
  - (ix) The design of the waste facility, particularly:
    - complementing or improving the character of an area;
    - limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
    - being of a scale, massing or height appropriate to the townscape or landscape;
    - using good quality materials;
    - minimising the requirement for exterior lighting; and,
    - utilising high-quality boundary treatments.

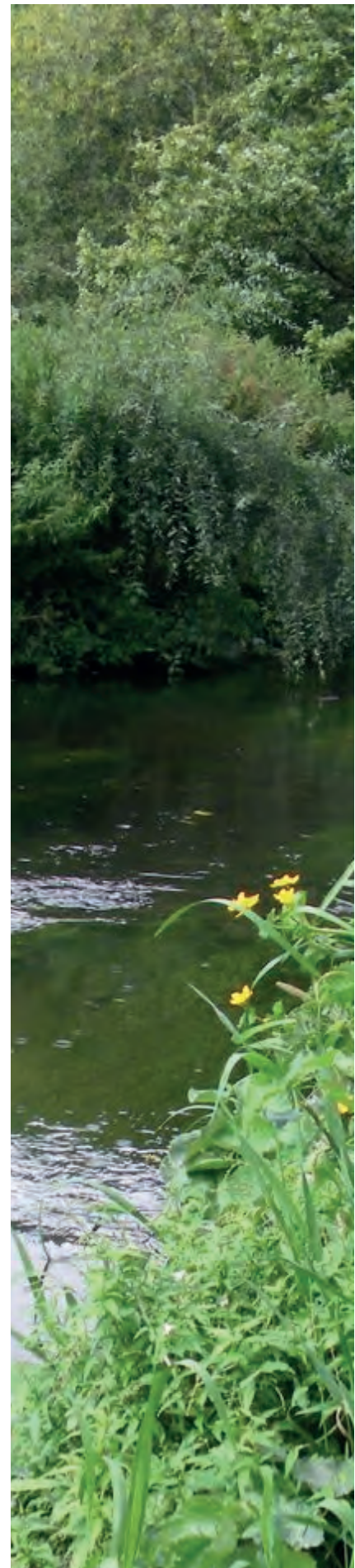
The information in the schedule below will provide the basis for the assessment of the impact of a development.

**Question WP5** Do you agree with Policy WP5?



### Schedule: Information which may be required for a planning application

- 1** Type(s) of waste to be managed at the site, e.g. CD&E and C&I.
- 2** Estimated annual throughput of each type of waste materials and timescale of operations for the current proposals and the estimated maximum capacities for the site, if different.
- 3** Estimated capacity of the site
- 4** Method of working. The annual throughput per treatment method, e.g. Transfer, MRF, AD.
- 5** Markets to be served
- 6** Present use, conditions and ground levels of the site and its surroundings.
- 7** Site layout, means of access, the design and siting of buildings and fixed and mobile machinery to be used
- 8** Hours of operation
- 9** Statement of Community Involvement
- 10** Preliminary assessment of BREEAM standard, undertaken by a BRE accredited assessor and commitment to submit a design stage certificate before construction can start on site and to undertake a post-construction review
- 11** Energy Assessment, including an assessment of energy demand and CO2 emissions
- 12** Assessment of the impact of the proposed development on the built and historic environment
- 13** Archaeological evaluation
- 14** Landscape assessment and landscaping proposals, including screening, landscaping works and boundary treatments
- 15** Tree Survey/Arboricultural Report
- 16** Biodiversity Assessment would be required where proposals are likely to affect nature conservation areas such as a: National or Local Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area, Site of Metropolitan, Borough or Local Importance for Nature Conservation, or Green Corridors.
- 17** Topographical Survey
- 18** Geological Assessment
- 19** Hydrological and hydrogeological assessment
- 20** Flood Risk Assessment
- 21** Site drainage details





- 22** Air Quality Impact Assessment, demonstrating the effects on air quality in the locality of a proposed site arising from the operation of the site and vehicles movements to and from it.
- 23** An assessment which identifies potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, and which identifies the mitigation measures to be used to minimise the effects of those nuisances.
- 24** Noise Impact Assessment
- 25** Sustainability Statement
- 26** Circular Economy Statement
- 27** Job creation details, including skills, training and apprentice opportunities
- 28** TV and Radio Reception Impact Assessment
- 29** Measures to prevent new or increased risk to aviation from the proposed development
- 30** Measures for protecting Public Rights of Way
- 31** Transport Assessment
- 32** Travel Plan
- 32** Route Management Strategy
- 33** Access Strategy
- 34** Delivery Servicing Plan/Freight Plan
- 35** Construction Logistics Plan
- 36** Highway safety measures
- 37** Design and Access Statement
- 38** Restoration, after care, after use and long-term management provision
- 39** An Environmental Impact Assessment may also be required under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 40** A Habitats Regulations Assessment, if the relevant borough and Natural England consider it may affect a European-designated site. European sites which may be affected are:
  - The Richmond Park SAC
  - The Wimbledon Common SAC
  - The Mole Gap to Reigate Escarpment SAC
  - The Ockham and Wisley Commons SSSI (part of the Thames Basin Heaths SPA)
- 41** Any other requirements from the relevant borough's Validation List

## WP6 Sustainable Design and Construction of Waste Facilities

- 5.36 A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation. “Designing Waste Facilities - A Guide to Modern Design in Waste” (DEFRA, 2008) states: “There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?” In addition, Policy S12 of the Draft London Plan (July 2019) provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change.
- 5.37 In terms of standards, the Building Research Establishment (BRE) has established a range of BREEAM schemes for rating the overall environmental performance of different types of non-residential buildings. Buildings are rated on a scale of ‘Pass,’ ‘Good,’ ‘Very Good,’ ‘Excellent’ or ‘Outstanding.’ However, there is no specific BREEAM scheme for waste facilities since there are many different technologies and building types. However, BRE advice is that it will be for developers to liaise with the BRE and BRE-accredited assessors in order to identify a suitable ‘bespoke’ BREEAM scheme to suit the particular characteristics of the proposed development. It is considered by the boroughs that many waste facilities should be able to meet the ‘Excellent’ standard. Similar standards should apply if the BREEAM is replaced by another environmental performance rating regime.
- 5.38 The reduction of carbon emissions is a key element of a BREEAM scheme and, in this respect, the Draft London Plan (July 2019) sets out that all major developments should be net zero carbon, including a minimum on-site reduction of at least 35% beyond building regulations 2013 (or equivalent).
- 5.39 Developers should also consider climate change adaptation measures in schemes. “Designing Waste Facilities - A Guide to Modern Design in Waste” also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise:
- **Odours.** With temperature increases, waste will need to be treated more quickly and unenclosed waste facilities (e.g. for composting facilities) will become particularly vulnerable to odour issues.
  - **Heating, Cooling and Energy Use.** Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly. Storage and unoccupied areas may be better placed in the warmest areas of the facility.
  - **Flood Readiness.** Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas. In addition, facilities should incorporate improvements to flood risk management in support of the objectives of the Catchment Flood Management Plan (CFMP) and the partner boroughs’ Strategic Flood Risk Assessments (SFRAs).
  - **Soil Subsidence.** The wetting and drying effect on soil may cause subsidence. Developers may need to consider deeper foundations or piling. Root barriers may be required depending on surrounding vegetation.
  - **Property Damage.** Higher wind speeds leading to structural damage, more intense rain leading to water infiltration and higher peak temperatures leading to blistering, warping and softening may affect the design of a building and the choice of materials.



5.40 In the construction phase of any development, consideration should be given to recycling Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. However, the boroughs are aware that this is not always feasible.

5.41 Therefore in accordance with national and regional advice, the Draft London Plan (July 2019) (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:

#### WP6 Sustainable Construction of Waste Facilities

- (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with the South London Waste Plan and any other relevant policies of the relevant borough's Development Plan.
- (b) Waste facilities will be required to:
  - (i) minimise on-site carbon dioxide emissions in accordance with the Draft London Plan Policy SI2;
  - (ii) be fully adapted and resilient to the future impacts of climate change in accordance with the Draft London Plan Policy GG6 , particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;
  - (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with Draft London Plan Policy G5;
  - (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;
  - (v) minimise waste and promote sustainable management of construction wastes on site; and,
  - (vi) protect, manage and enhance local habitats and biodiversity.

**Question WP6** Do you agree with Policy WP6?

## WP7 The Benefits of Waste

5.42 The 2008 Climate Change Act (amended 2019) sets a target to make UK net zero carbon by 2050. The target will have to be partly achieved by societal changes, such as new technology, waste minimisation and increased rental and sharing, but waste facilities will have a major role to play in achieving the target and can contribute to the circular economy.

### Reuse, Refurbishment, Recycling and By-products

5.43 Therefore, the South London Waste Plan boroughs will encourage waste treatment applications that can lead to a prolonged product life (reuse and refurbishment), can provide secondary materials (remanufacture) or produce by-products, such as biogas from composting and refuse derived fuel and providing combined cooling, heat and power.

### Energy from Waste

5.44 In the London Environment Strategy (Objective 7.4), the Mayor of London states that “achieving reduction and recycling targets will mean that no new energy from waste facilities in London will be needed.” Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted.

### Job Creation and Social Value

5.45 Although the South London Waste Plan boroughs have relatively high employment rates overall, there are pockets of the four boroughs where employment is lower. The intensification of existing waste sites provides an opportunity for increased employment, often within a low employment hotspot. Therefore, the South London Waste Plan boroughs would welcome information on how the intensification may generate additional employment.

5.46 Therefore, in accordance with the London Plan, the London Environment Strategy and this plan’s objectives:

### WP7 The Benefits of Waste

- (a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.
- (b) Waste development for additional Energy from Waste facilities will not be supported
- (c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.

**Question WP7** Do you agree with Policy WP7?





## WP8 Planning Obligations

5.47 Planning Obligations, or Section 106 agreements, are legal agreements negotiated between local authorities and developers or unilateral undertakings made by developers. The use of planning obligations will be in line with the prevailing legislation and guidance and the prevailing policies of the relevant borough.

5.48 In all cases, the boroughs in the plan area will try to use a planning condition to make a proposed development acceptable before resorting to a planning obligation. However, there may be situations where the use of planning conditions is not possible. The following are examples of where a planning obligation may be considered:

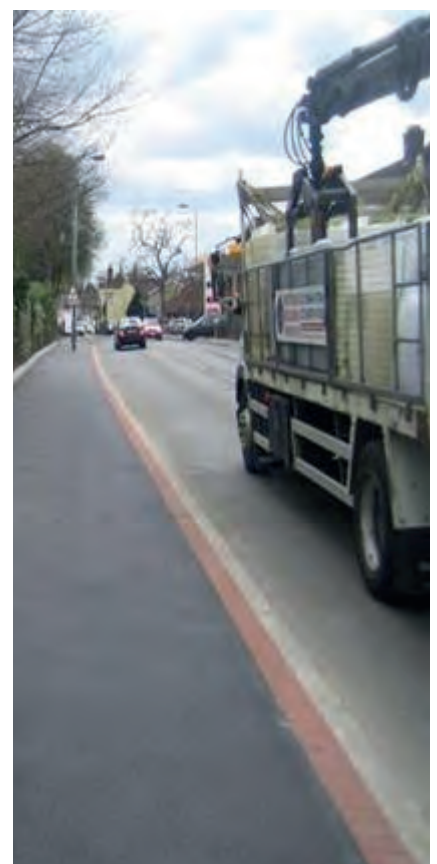
- Traffic management measures, including the routing of vehicles;
- Access and highway improvements;
- Provision of infrastructure, including low carbon and decentralised energy networks,
- Carbon offsetting contributions;
- Protection of sites of international, national, regional or local importance;
- Environmental enhancement;
- Flood risk compensation works;
- Archaeological investigation, recording and keeping of artefacts and safeguarding of remains;
- Off-site monitoring of emissions and the water environment; and,
- Provision and management of off-site or advance planting and screening.
- Job brokerage, training and skills to encourage local employment opportunities.

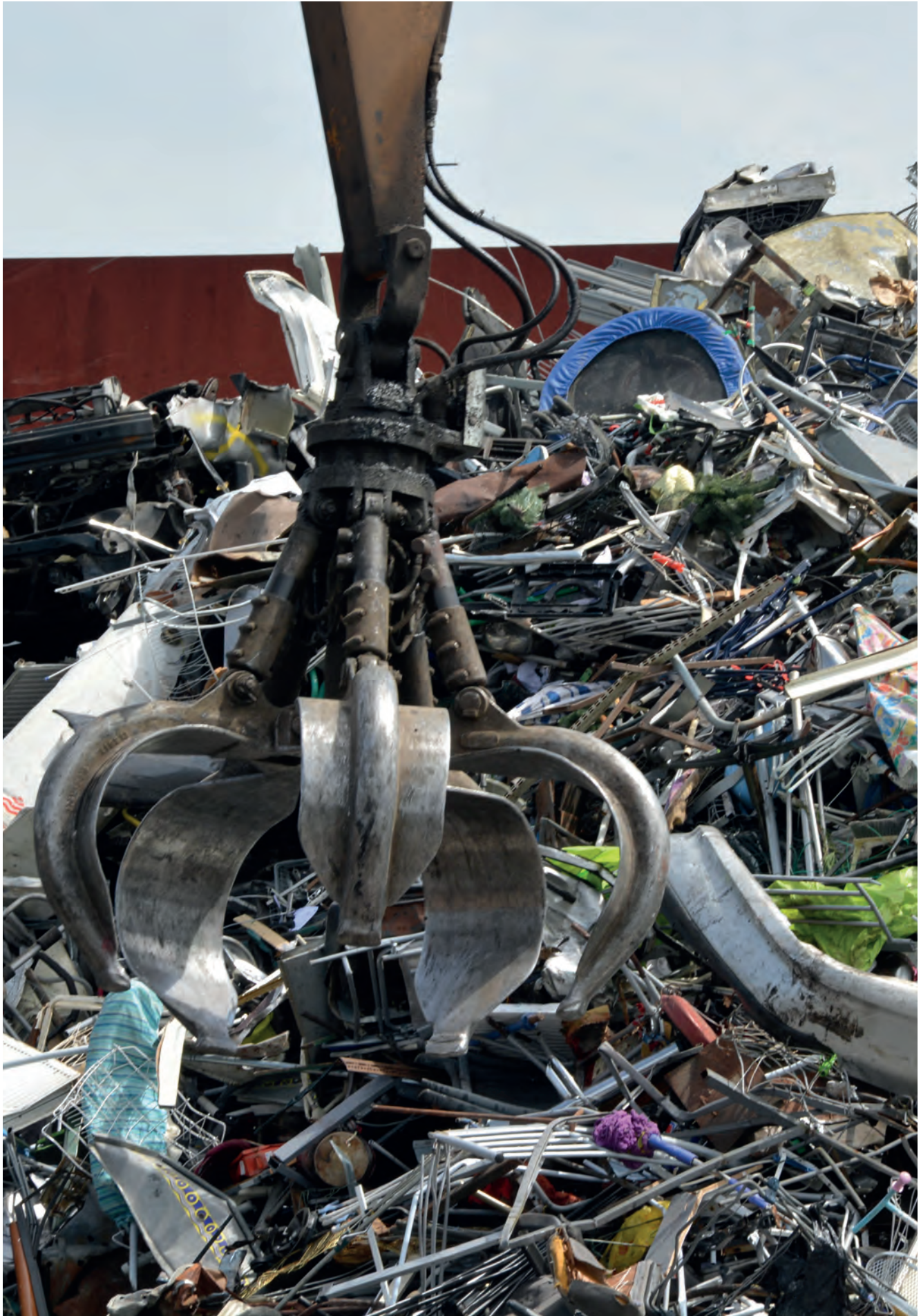
5.49 In addition, dependent on the relevant borough's Community Infrastructure Levy (CIL) Charging Schedule, a waste development may be CIL-liable.

### WP8 Planning Obligations

Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.

**Question WP8** Do you agree with Policy WP8?





## How to read the information on Safeguarded Sites

**Site size:** in hectares

**Type of facility:** usually derived from the type of permit granted. There are three types of waste facilities:

- (i) a waste management facility, which reuses, recycles or reprocesses waste and therefore its throughput can count towards the south London target;
- (ii) a waste transfer facility, which processes or sorts waste for management elsewhere. In practice, however, most transfer stations do some management and, where this management capacity is known, it is counted towards the south London target;
- (iii) a waste treatment facility is a general term covering both waste management and waste transfer facilities

**Type of waste accepted:** from the following types:

- (i) household; or
- (ii) commercial and industrial; or
- (iii) local authority collected waste, usually a combination of household and commercial and industrial; or
- (iv) construction and demolition; or
- (v) excavation; or
- (vi) wastewater; or
- (vii) hazardous (eg asbestos, chemicals, oil, electrical goods and some types of healthcare waste)

**Maximum throughput (in tonnes per annum):** The maximum throughput achieved by the site in any one year between 2013 and 2017. The Draft London Plan recommends that boroughs should use this measure to assess capacity

**Licensed capacity (in tonnes per annum):** The maximum capacity for the site from its Environment Agency permit. This is not a reliable guide to capacity as permitted capacities are based on capacity bands into which permits are divided rather than the operating annual capacity of the site, and, therefore, the capacity detailed in the licence tends to be at the top end of the charging bands. Therefore, many sites give permitted capacities of 74,999 tonnes, 24,999 tonnes and 4,999 tonnes and it is likely that such figures used are over estimates of actual operational capacities.

**Qualifying throughput (in tonnes per annum):** This is the element of the maximum throughput which counts as waste management. For it to count as waste management, it must be applicable to one of the London Plan criteria for waste management:

- (i) used in London for energy recovery;
- (ii) materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- (iii) materials reused, recycled or reprocessed in London;
- (iv) produced as a solid-recovered fuel or a high-quality refuse-derived fuel

**Site Description:** A description of the site and its immediate surroundings

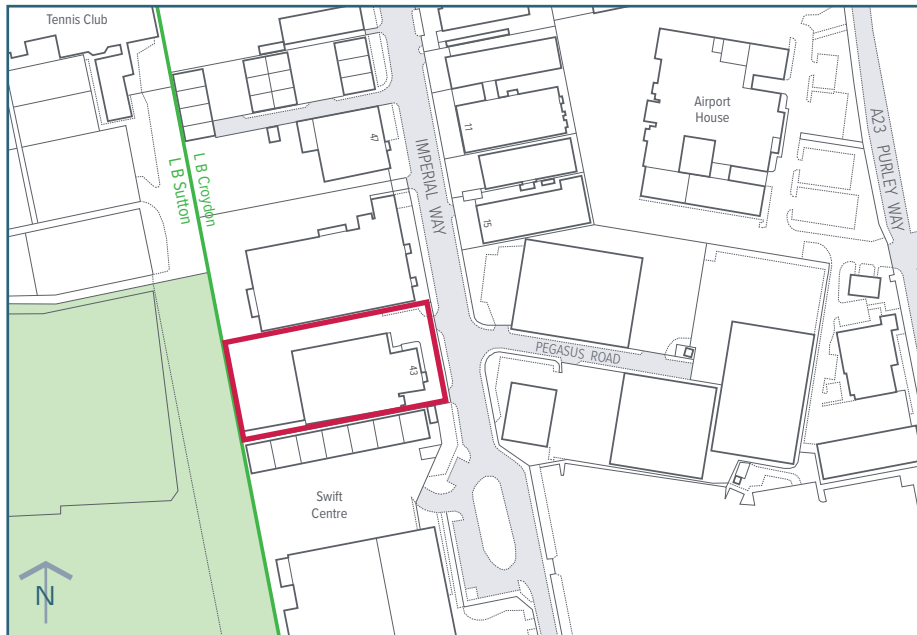
**Planning Designations:** The principal and relevant designations covering the site from the relevant borough's Policies Map

**Currently Safeguarded:** Whether the site is safeguarded in the 2011 South London Waste Plan

**Opportunity to increase waste managed:** Whether the site has the scope to increase its capacity to manage waste. This may come from increasing throughput through the reconfiguration of the site. It does not include switching from non-waste management activities (such as sorting) to waste management activities (such as recycling).

**Issue to consider if there is a further application:** The principal issues facing the site if it is redeveloped for additional or a different type of waste treatment. This is unlikely to be the case in most instances. Appendix 1 shows the sites which have been assessed as being able to intensify.

**C1 Able Waste Services, 42 Imperial Way, Croydon CR0 4RR**



Not to Scale

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Site size (ha)	0.45
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	46,463
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	43,268 (C&D)

**Site Description**

Two-storey office block fronting Imperial Way with modern double-height warehouse to rear. The site lies within the Imperial Way Industrial Estate which comprises a mix of new and 1970s warehouses, mostly two-storey.

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

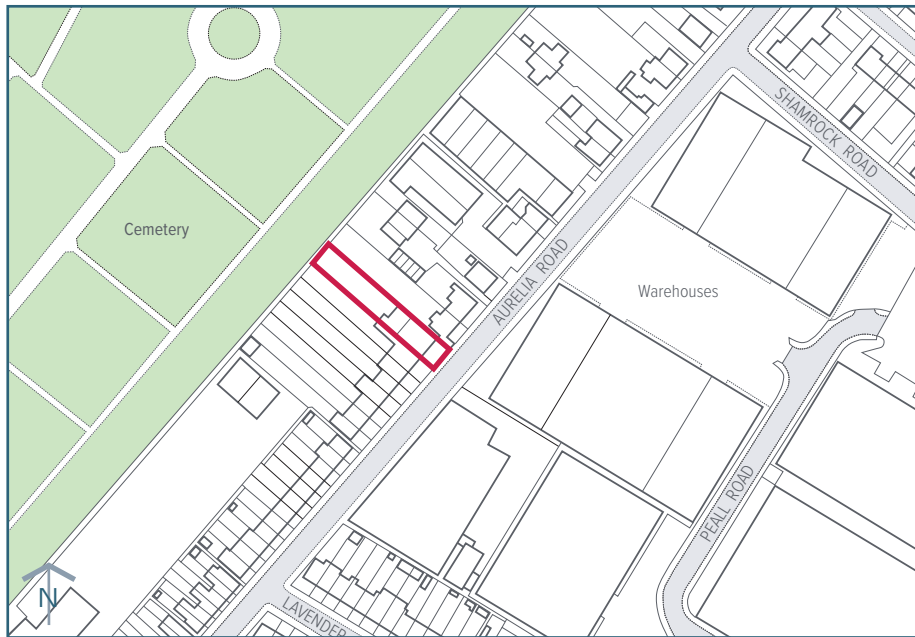
No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank.
  - Providing appropriate soft landscaping and regard to the adjacent Roundshaw Park

**Question C1** Do you agree this site should be safeguarded for waste uses?

## C2 Croydon Car Spares, 111 Aurelia Road, Croydon CR0 3BF



Not to Scale

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Site size (ha)	0.05
Type of facility	Metal Recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	241
Licensed capacity (tpa)	572
Qualifying throughput (tpa)	241 (HCI)

**Site Description** A small, double-storey interwar workshop.  
 The site is located within a mixed use area. The site has residential properties on both sides and an industrial area/retail park opposite.

**Planning Designations** Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This site is very constrained site and there is no opportunity to expand.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Ampere Way APA
  - Protecting the amenity of those using the nearby locally listed park - Mitcham Road and Croydon Crematorium.
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land

**Question C2** Do you agree this site should be safeguarded for waste uses?

### C3 Curley Skip Hire, Rear of 64 Northwood Road, Croydon CR7 8HQ



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Site size (ha)	0.07
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	9,294
Licensed capacity (tpa)	10,920
Qualifying throughput (tpa)	0

**Site Description** The site is mainly open skip storage and hardstanding with some single-storey covered areas for sorting waste.

The site lies within a small industrial site located in a predominantly residential area. The units are mainly double and triple-height inter-war sheds.

**Planning Designations** None

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This site is adjacent to site allocations for residential and community uses: Audrey House, 50 Northwood Road (Site Allocation reference 284). The site is therefore not considered suitable for intensification or expansion.

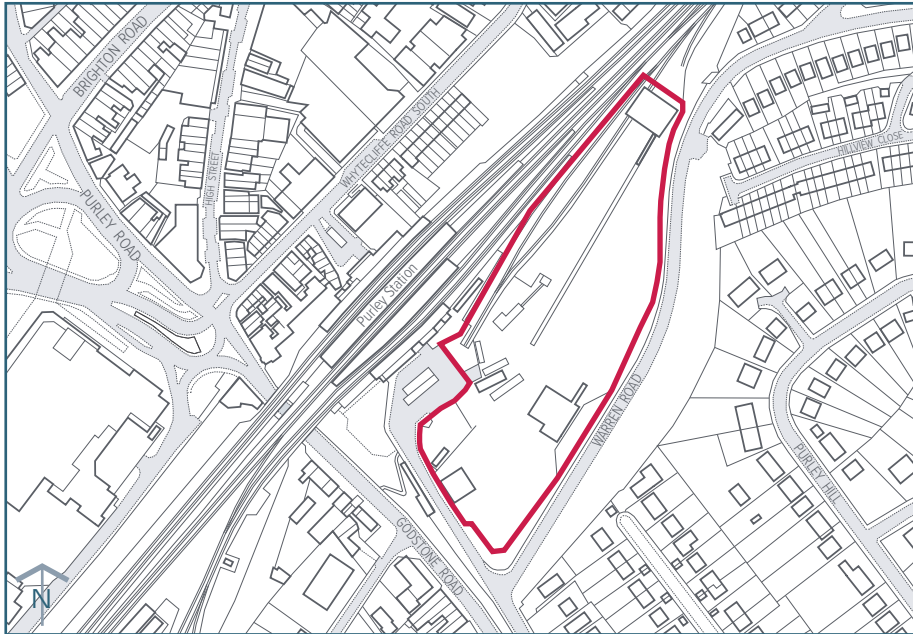
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts and having regard to the future occupiers of the allocated housing site and community use.

**Question C3** Do you agree this site should be safeguarded for waste uses?

### C4 Days Aggregates Purley Depot, Approach Road, Croydon CR8 2AL



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Site size (ha)	2.0
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	179,300
Licensed capacity (tpa)	249,999
Qualifying throughput (tpa)	0

**Site Description** Open aggregates storing, treatment, recycling and storage facility with associated two-storey, mid-century office block and enclosed sheds.  
The site lies adjacent to Purley rail station and is reasonably isolated from nearby

**Planning Designations** Archaeological Priority Area

**Currently Safeguarded** No

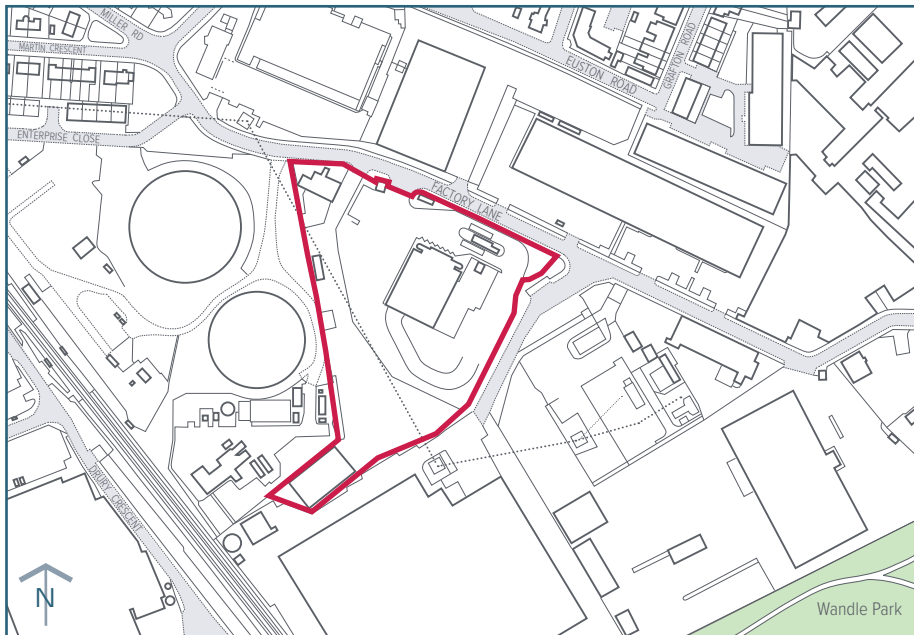
**Opportunity to increase waste managed** No. The railhead makes this site well-suited to its current use. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

**Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – London to Brighton Road
- Not harming biodiversity in the vicinity
- Providing appropriate soft landscaping

**Question C4** Do you agree this site should be safeguarded for waste uses?

### C5 Factory Lane Waste Transfer Station, Factory Lane, Croydon CR0 3RL



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Site size (ha)	1.8
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	19,736
Licensed capacity (tpa)	200,000
Qualifying throughput (tpa)	9,623 (HCI) 5,206 (C&D)

**Site Description**

A large triple-storey building surrounded by hardstanding.

The site is part of a larger industrial area. At present, the site accommodates a household reuse and recycling centre and waste transfer station. Active gas holders lie to the north-west of the site and power lines are overhead.

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded**

Yes – Site reference in 2011 SLWP: 1

**Opportunity to increase waste managed**

Yes. There are no plans by the South London Waste Partnership to intensify operations at this site. While household reuse and recycling centres have a low throughput per hectare, the site is large and there may be an opportunity to co-locate other waste uses on the site.

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any remains in the Ampere Way archaeology priority area
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

**Question C5** Do you agree this site should be safeguarded for waste uses?



### C6 Fishers Farm Civic Amenity Site, North Downs Road, Croydon CR0 0LF



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Site size (ha)	0.2
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	6,895
Licensed capacity (tpa)	15,125
Qualifying throughput (tpa)	4,542(HCI)

**Site Description** Open local authority household reuse and recycling centre  
 Located on the edge of a residential area adjacent to farmland

**Planning Designations** Archaeological Priority Area

**Currently Safeguarded** Yes – Site Reference in SLWP 2011: 2

**Opportunity to increase waste managed** No. There are no plans to intensify

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains in the Croydon Downs Archaeological Priority Area
  - Not harming biodiversity in the vicinity and in particularly the nearby site of nature conservation at Riddlesdown
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Green Belt
  - Providing appropriate soft landscaping

**Question C6** Do you agree this site should be safeguarded for waste uses?

### C7 Henry Woods Waste Management, Land adjacent to Unit 9, Mill Lane Trading Estate, Croydon CR0 4AA



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Site size (ha)	0.7
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	12,885
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

**Site Description** Open skip storage and waste sorting  
The site lies within an existing strategic industrial area.

**Planning Designations** Strategic Industrial Area  
Archaeological Priority Area

**Currently Safeguarded** No

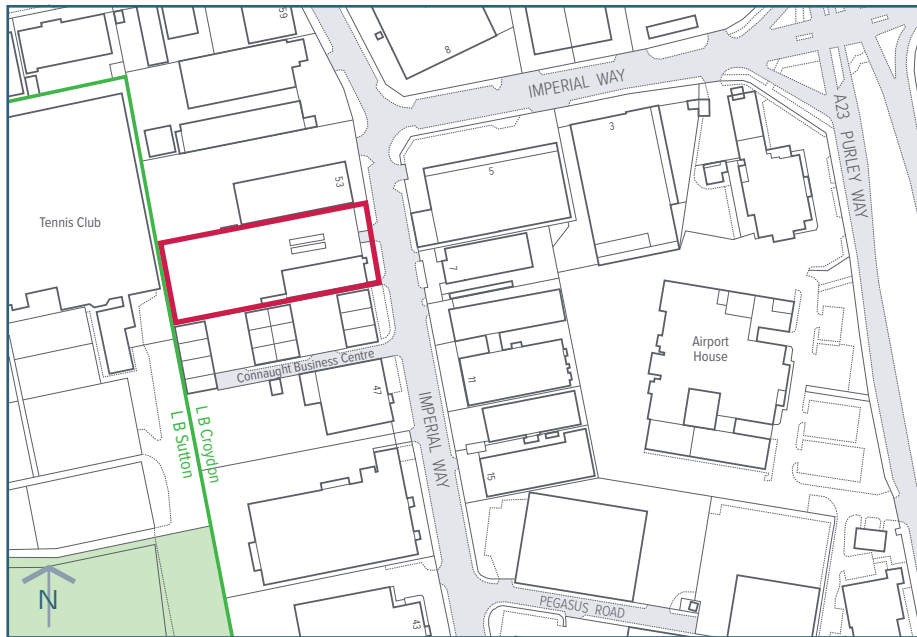
**Opportunity to increase waste managed** No. This is a very constrained site with no opportunity for expansion or intensification

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
  - Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads

**Question C7** Do you agree this site should be safeguarded for waste uses?

### C8 New Era Metals, 51 Imperial Way, Croydon CR0 4RR



Not to Scale

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Site size (ha)	0.4
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	4,213
Licensed capacity (tpa)	4,999
Qualifying throughput (tpa)	4,213 (HCI)

**Site Description** Modern double-height warehouse with adjacent hardstanding area for metal sorting  
 The site lies within the Imperial Way Industrial Estate, which comprises a mix of new and mid-century warehouses, mostly double height.

**Planning Designations** Strategic Industrial Area  
 Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This site is achieving near its permitted capacity so it is unlikely that there is an opportunity to intensify the site in its current form.

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains in the archaeological priority area of Mere Bank
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Providing appropriate soft landscaping

**Question C8** Do you agree this site should be safeguarded for waste uses?

### C9 Pear Tree Farm, Featherbed Lane, Croydon CR0 9AA



Not to Scale

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Site size (ha)	1.8
Type of facility	Waste Transfer Station
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	37,500
Licensed capacity (tpa)	37,500
Qualifying throughput (tpa)	0

<b>Site Description</b>	Uncovered sorting facility, skip storage area along with vehicle storage and repair Site is within the Green Belt surrounded by farmland
<b>Planning Designations</b>	Green Belt      Archaeological Priority Area
<b>Currently Safeguarded</b>	Yes - Site reference in SLWP 2011:5
<b>Opportunity to increase waste managed</b>	No. This site is within the Green Belt and has been refused permission to intensify operations on several occasions on the basis of harm to the Green Belt and character and appearance of the area. Therefore this site is not suitable for intensification.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the nearby open spaces</li> <li>● Evaluating and preserving any archaeological remains as the site is in the archaeological priority area - Croydon Downs</li> <li>● Minimising flood risk on- and off-site</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Green Belt</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question C9** Do you agree this site should be safeguarded for waste uses?

### C10 Purley Oaks Civic Amenity Site, Brighton Road, Croydon CR8 2BG



Not to Scale

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Site size (ha)	0.2
Type of facility	Transfer
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	9,099
Licensed capacity (tpa)	12,535
Qualifying throughput (tpa)	6,684 (HCI)

**Site Description** Open local authority reuse and recycling centre. Located within a local centre with nearby residential development.

**Planning Designations** Place Specific Policy area: DM42.1 Purley District Centre  
Archaeological Priority Area

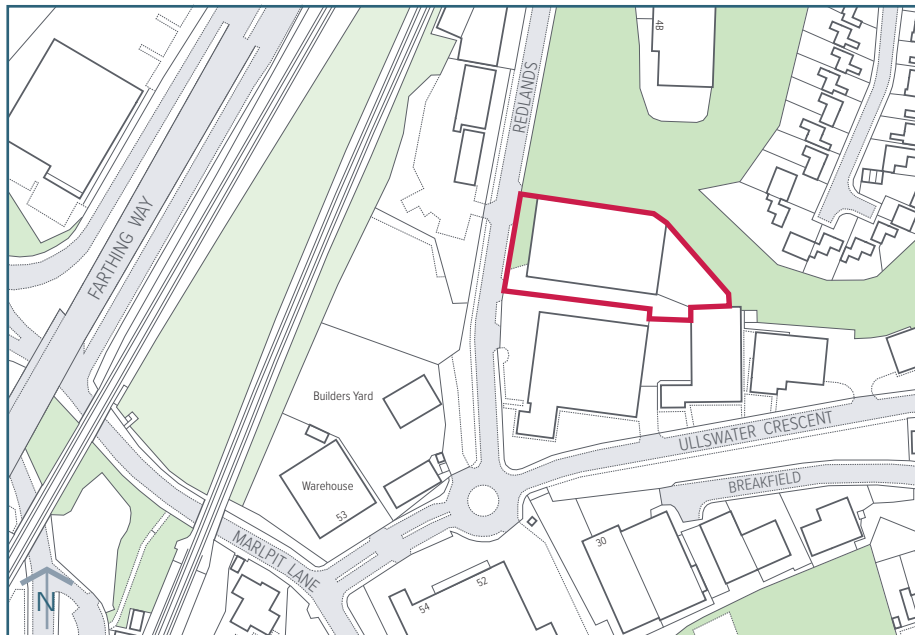
**Currently Safeguarded** Yes – Site reference in SLWP 2011: 4

**Opportunity to increase waste managed** No. The site is adjacent to the proposed Site DM42.3 for a Gypsy and traveller site so there is no capacity to expand

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
  - Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains in the archaeology priority area London to Brighton Roman Road
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Providing appropriate soft landscaping
  - Note that the Schedule 2 Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018

**Question C10** Do you agree this site should be safeguarded for waste uses?

### C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon CR5 2HT



Not to Scale

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Site size (ha)	0.3
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	Not operational
Licensed capacity (tpa)	12,782
Qualifying throughput (tpa)	0

**Site Description** Large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear

The site lies within an industrial area with similar adjacent uses. To the east, there is a residential area with a buffer of green space and trees between.

**Planning Designations** Strategic Industrial Location

**Currently Safeguarded** Yes – Site reference in SLWP 2011: A

**Opportunity to increase waste managed** Yes. The site is currently vacant waste site and so there is an opportunity to add throughput to the apportionment total

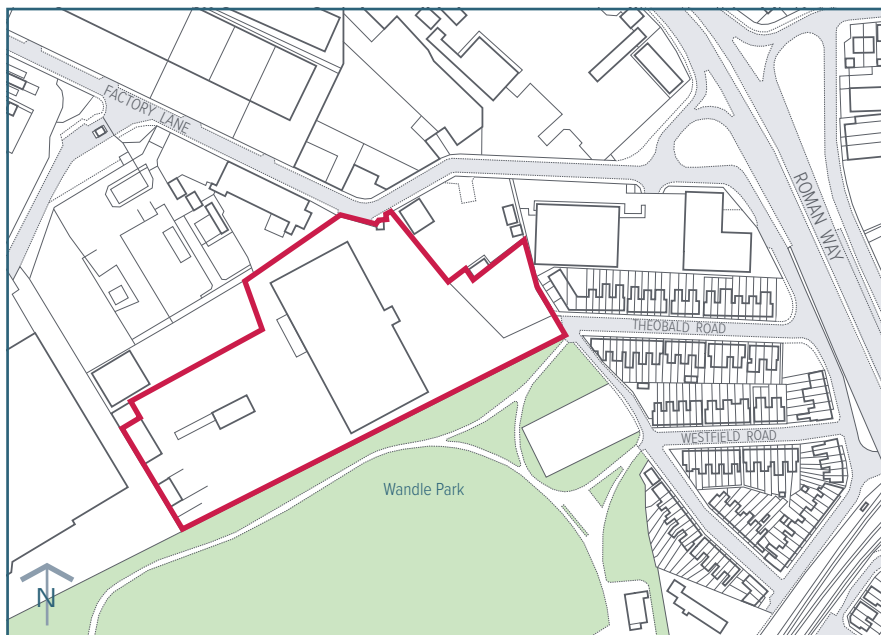
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts

**Question C11** Do you agree this site should be safeguarded for waste uses?

### C12 Stubbs Mead Depot, Factory Lane, Croydon CR0 3RL



Not to Scale

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Site size (ha)	0.06
Type of facility	Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	24,383
Licensed capacity (tpa)	Unknown
Qualifying throughput (tpa)	0

**Site Description**

Large double-height shed with associated circulation.

The site lies within an industrial area with similar adjacent uses. To the south, there is Wandle Park and to the east some residential properties are relatively nearby

**Planning Designations**

Strategic Industrial Location

**Currently Safeguarded**

Yes – Site reference in SLWP 2011: B

**Opportunity to increase waste managed**

Yes. The site had some throughput in the past but has not registered a return since 2015.

**Issues to consider if there is a further application**

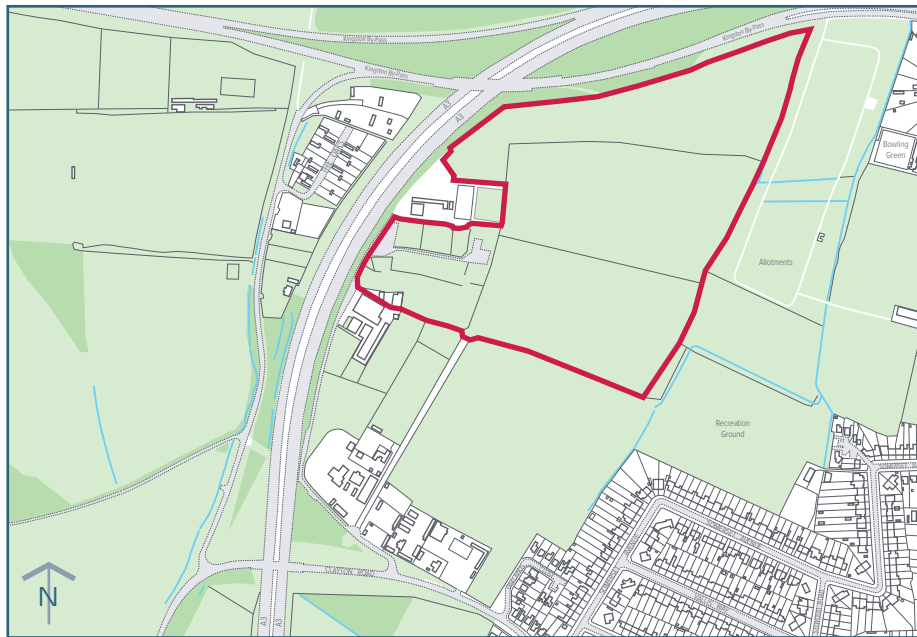
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Wandle Park
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

**Question C12** Do you agree this site should be safeguarded for waste uses?





### K1 Chessington Equestrian Centre, Clayton Road, Kingston KT9 1NN



Not to Scale

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Site size (ha)	9.9
Type of facility	Deposit of waste to land as a recovery operation
Type of waste	Excavation,
Maximum throughput tonnes per annum (tpa)	44,285
Licensed capacity (tpa)	99,999
Qualifying throughput (tpa)	0

**Site Description** Open facility.  
 The site is located in the Green Belt. Chessington Equestrian Centre is adjacent. There are mobile homes and an industrial area to the south of the site.

**Planning Designations** Green Belt

**Currently Safeguarded** No

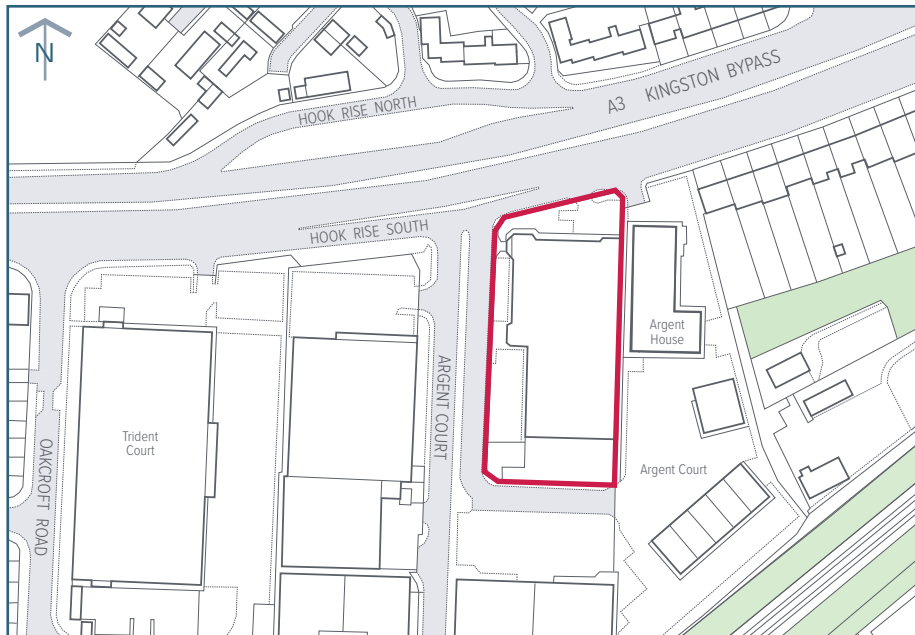
**Opportunity to increase waste managed** No. The Chessington Equestrian Centre has a permit to accept inert excavation waste as a recovery operation. This is not a permanent waste site and therefore no opportunity to intensify uses.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Hook and Southborough Cricket Club and King Edward’s Recreation Ground
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question K1** Do you agree this site should be safeguarded for waste uses?

**K2 Genuine Solutions Group, Solutions House, Unit 1A, Kingston KT6 7LD**

Site size (ha)	0.3
Type of facility	recycling and Reuse
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	1,630
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	1,630 (HCI)



Not to Scale

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**Site Description** Two-storey office block fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear  
 In an industrial area surrounded by similar large industrial sheds. Fronting onto Hook Rise South, beyond which is the Kingston bypass.

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area

**Currently Safeguarded** No

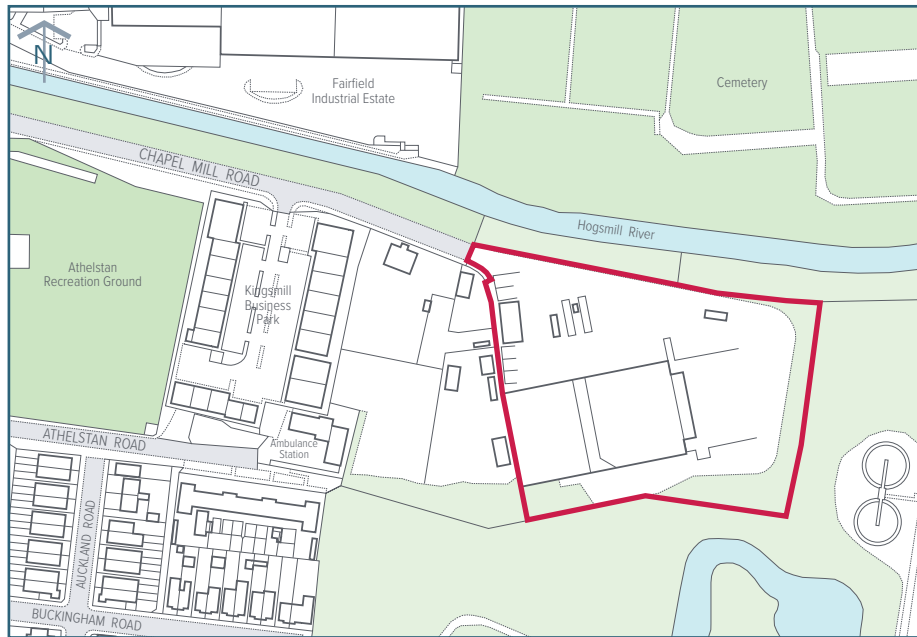
**Opportunity to increase waste managed** No. This type of facility typically has a lower throughput per hectare, so it is unlikely that there is an opportunity to intensify operations at this site in its current form.

**Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the nearby Tolworth Recreation Ground, King George’s Field, Tolworth Court Farm Fields and Corinthian Casuals Football Club
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Providing appropriate soft landscaping

**Question K2** Do you agree this site should be safeguarded for waste uses?

### K3 Kingston Civic Amenity Site, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



Not to Scale

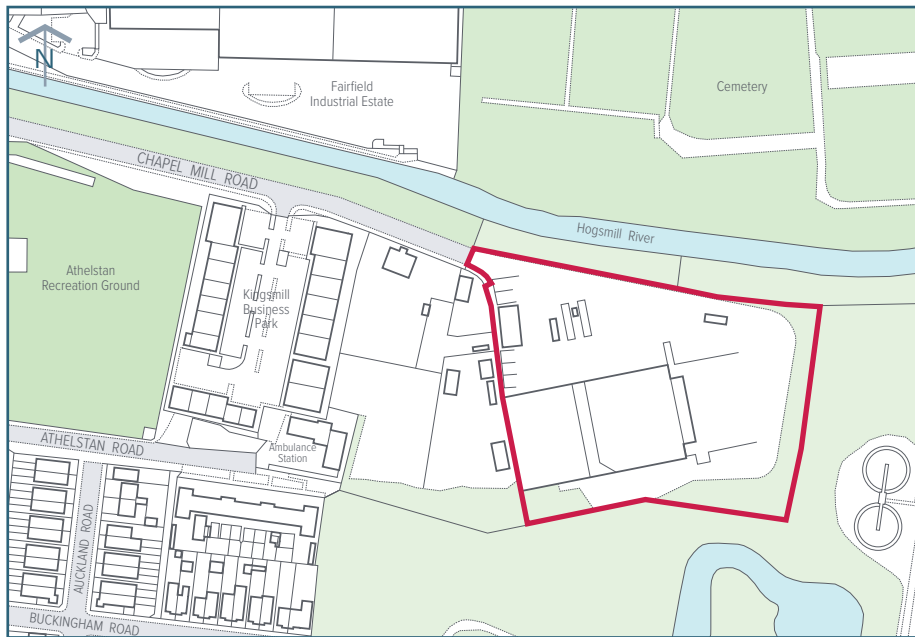
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Site size (ha)	2.0 (including K4)
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,363
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,392 (HCI)

<b>Site Description</b>	<p>Enclosed local authority reuse and recycling centre</p> <p>The site lies within an industrial area which is surrounded by open space. The Kingston Waste Transfer Station is within the same site.</p>
<b>Planning Designations</b>	<p>Locally Significant Industrial Site</p> <p>Area of Archaeological Significance</p>
<b>Currently Safeguarded</b>	<p>Yes. Site reference in SLWP 2011: 6</p>
<b>Opportunity to increase waste managed</b>	<p>No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.</p>
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question K3** Do you agree this site should be safeguarded for waste uses?

### K4 Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



Site size (ha)	2.0 (including K3)
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	68,883
Licensed capacity (tpa)	200,500
Qualifying throughput (tpa)	19,620 (HCI)

Not to Scale

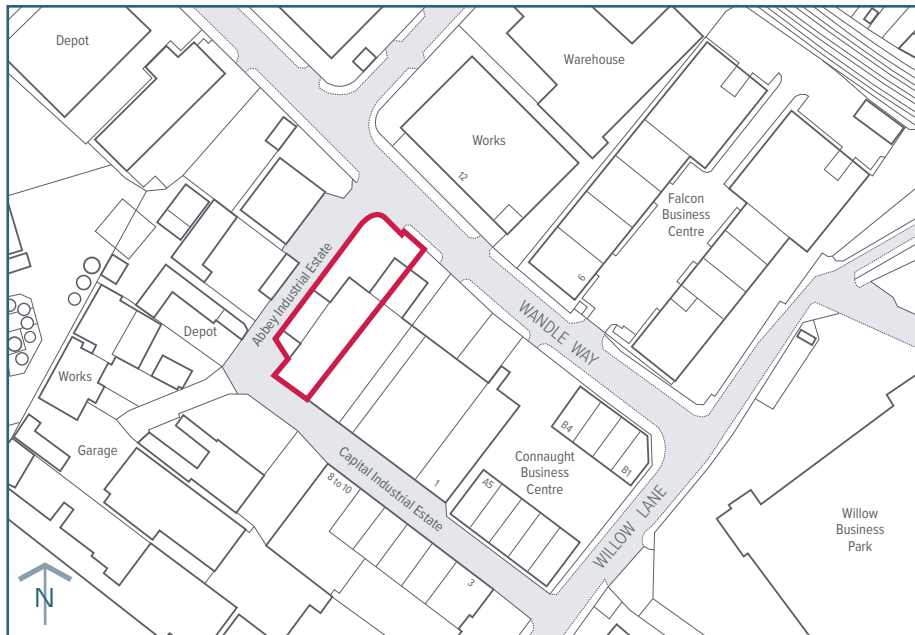
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<b>Site Description</b>	<p>Double-height enclosed shed with hardstanding for vehicles.</p> <p>The site lies within an industrial area which is surrounded by open space. The Kingston Civic Amenity Site is within the same site.</p>
<b>Planning Designations</b>	<p>Locally Significant Industrial Site      Area of Archaeological Significance</p>
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.
<b>Issues to consider if there is a further application</b>	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Open Land</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question K4** Do you agree this site should be safeguarded for waste uses?



### M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.06
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	3,729
Licensed capacity (tpa)	5,000
Qualifying throughput (tpa)	0

**Site Description** Open area with skips  
 Located within an industrial area and surrounded by similar two-storey sheds. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

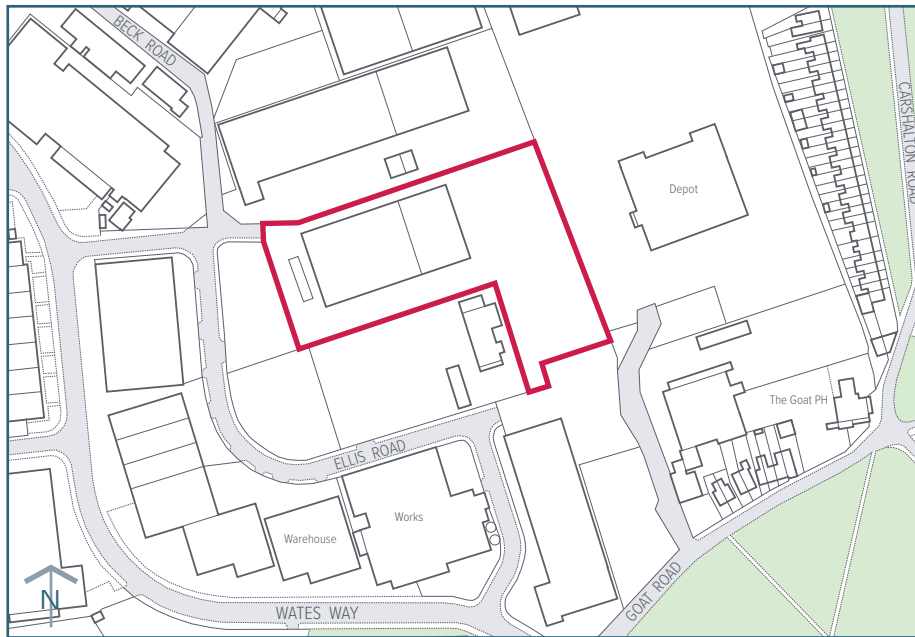
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M1** Do you agree this site should be safeguarded for waste uses?

## M2 European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX



Not to Scale

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Site size (ha)	1.0
Type of facility	Metal recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	70,100
Licensed capacity (tpa)	109,500
Qualifying throughput (tpa)	70,100 (HCI)

### Site Description

A collection of large double-height warehouses and office space with hardstanding for metal sorting, vehicles and skips

Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north west of the site

### Planning Designations

Strategic Industrial Location  
Archaeological PriorityZone

### Currently Safeguarded

Yes. Site Reference in SLWP 2011: 22 (under name of B Nebbett & Son)

### Opportunity to increase waste managed

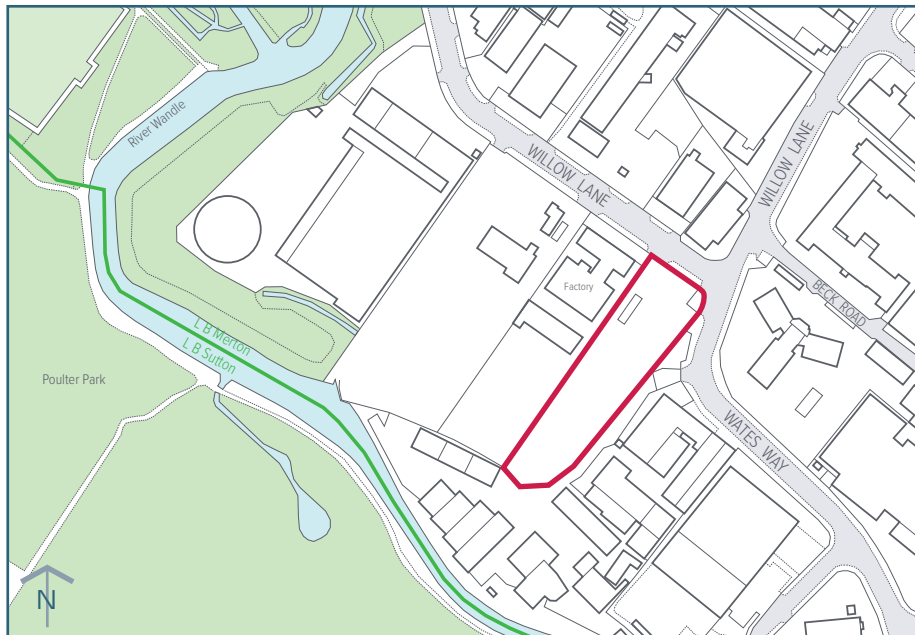
No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M2** Do you agree this site should be safeguarded for waste uses?

### M3 Deadman Confidential, 35 Willow Lane, Merton CR4 4NA



Site size (ha)	0.4
Type of facility	Paper sorting and baling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	5,000
Licensed capacity (tpa)	N/A
Qualifying throughput (tpa)	5,000 (HCI)

Not to Scale

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**Site Description** Hardstanding for material sorting, vehicles and skips. Two-storey portakabin office  
 Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

**Currently Safeguarded** No

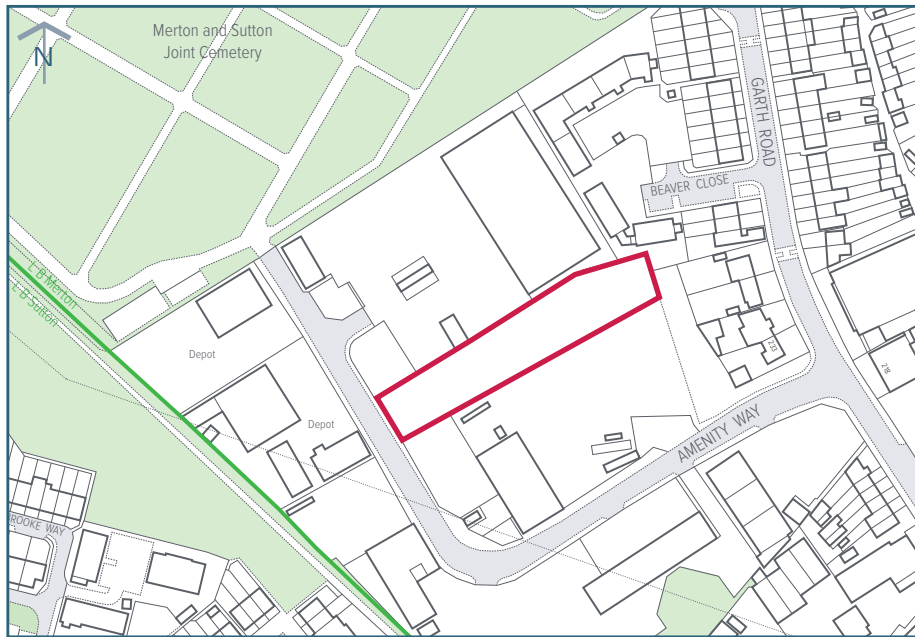
**Opportunity to increase waste managed** Yes. There is a 2010 planning permission for metals recycling on this site with a throughput of 1,500 tonnes per week, which equates to 78,000 tonnes per annum. Therefore, there could be an opportunity to intensify throughput on the site with some intervention.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M3** Do you agree this site should be safeguarded for waste uses?



**M4 Garth Road Civic Amenity Site, 66-69 Amenity Way, Garth Road, Merton SM4 4AX**



Not to Scale

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Site size (ha)	0.7 (including M5)
Type of facility	Household Waste Amenity Site
Type of waste	Local Authority, collected waste
Maximum throughput tonnes per annum (tpa)	14,594
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,866 (HCI)

**Site Description** Open local authority reuse and recycling centre

The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units

**Planning Designations** Locally Significant Industrial Location

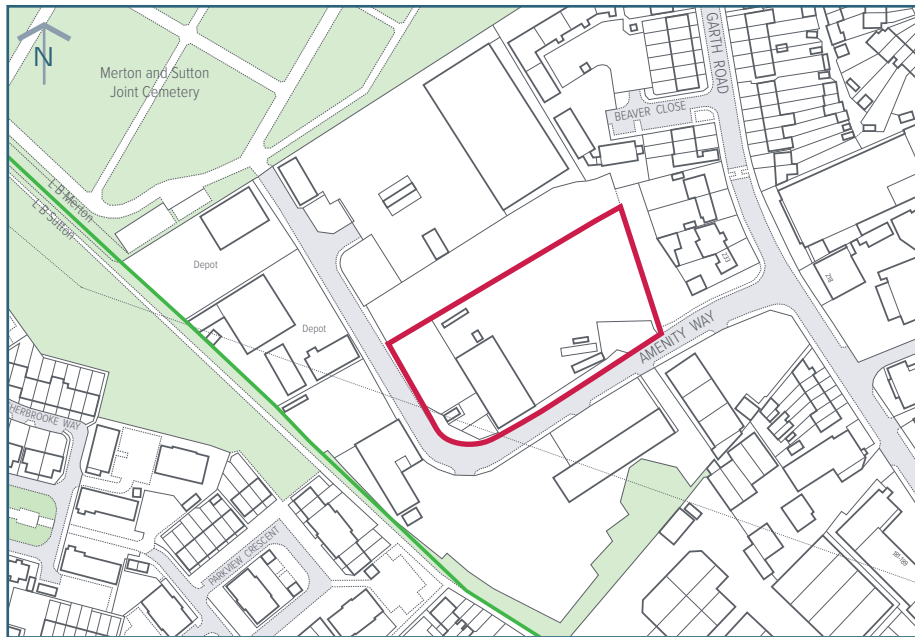
**Currently Safeguarded** Yes. Site Reference in SLWP 2011: 9

**Opportunity to increase waste managed** No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Providing appropriate soft landscaping

**Question M4** Do you agree this site should be safeguarded for waste uses?

### M5 Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.45
Type of facility	Transfer Station
Type of waste	Local Authority, Collected Waste and Hazardous
Maximum throughput tonnes per annum (tpa)	18,839
Licensed capacity (tpa)	22,281
Qualifying throughput (tpa)	15,704 (HCI)

**Site Description** Transfer station

The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units

**Planning Designations** Locally Significant Industrial Location

**Currently Safeguarded** Yes. Site Reference in SLWP 2011: 9

**Opportunity to increase waste managed** No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site

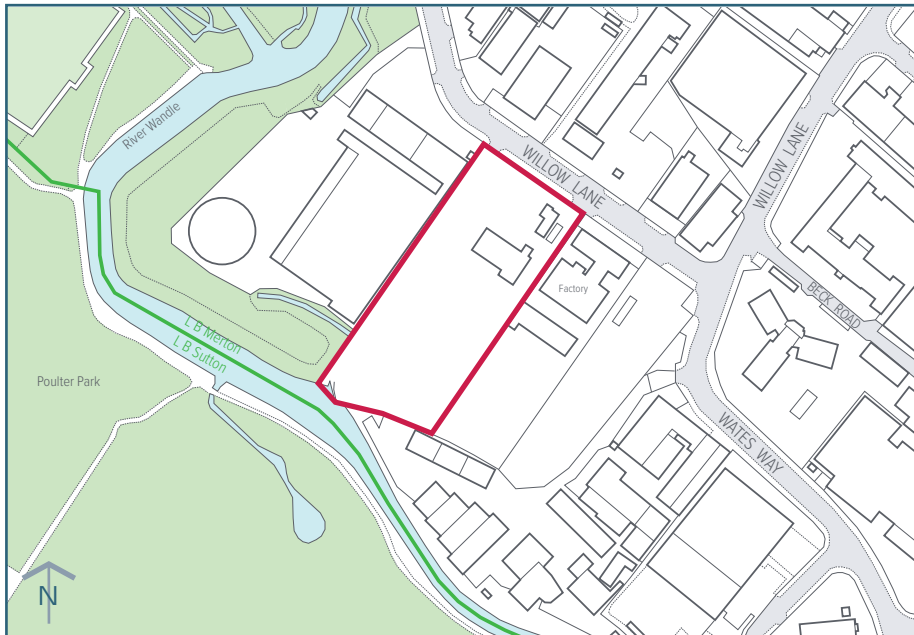
**Issues to consider if there is a further application**

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Providing appropriate soft landscaping

**Question M5** Do you agree this site should be safeguarded for waste uses?

### M6 George Killoughery, 41 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste accepted	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	71,253
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

#### Site Description

A large site comprising a double-height industrial shed with hardstanding for vehicles, skips and waste.

Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

Planning Designations	Strategic Industrial Location	Archaeological Priority Zone
Currently Safeguarded	No	
Opportunity to increase waste managed	No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form	
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts</li> <li>● Minimising flood risk on- and off-site</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Not harming biodiversity in the vicinity</li> <li>● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected</li> <li>● Designing a facility that does not impact on the openness of Metropolitan Open Land</li> <li>● Providing appropriate soft landscaping</li> </ul>	

**Question M6** Do you agree this site should be safeguarded for waste uses?

**M7 LMD Waste Management, Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA**



Site size (ha)	0.06
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	24,999
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	20,774 (C&D)

Not to Scale

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**Site Description** Mainly open hardstanding for Construction and Demolition waste sorting. Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. It is unlikely that there is an opportunity to intensify operations

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M7** Do you agree this site should be safeguarded for waste uses?

### M8 LMD Waste Management, 32 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	38,738
Licensed capacity (tpa)	50,000
Qualifying throughput (tpa)	33,845 (C&D)

**Site Description** Double-height shed with attached single-storey offices

Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location opposite the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

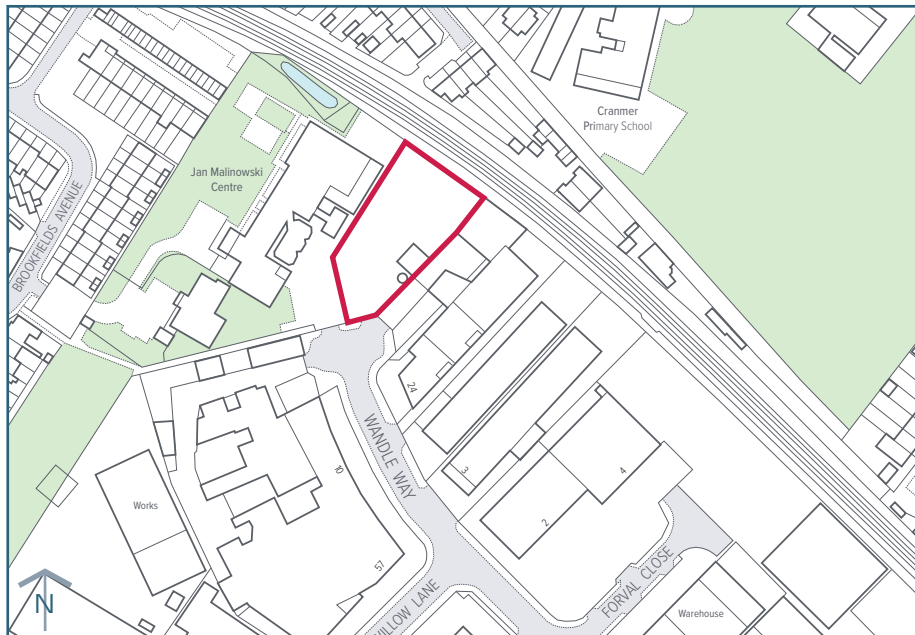
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput ratio is above average for this type of facility

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
    - Designing the site so that operations are carried out within a fully enclosed building
    - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
    - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
    - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
    - Minimising flood risk on- and off-site
    - Evaluating and preserving any archaeological remains
    - Providing appropriate soft landscaping

**Question M8** Do you agree this site should be safeguarded for waste uses?

### M9 Maguire Skips, Storage Yard, Wandle Way, Merton CR4 4NB



Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	58,150
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** Mainly open hardstanding for skips and sorting. Double-height covered area. Located within the Willow Lane industrial estate and surrounded by similar industrial properties, however, there are residential properties approximately 20 metres to the north of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

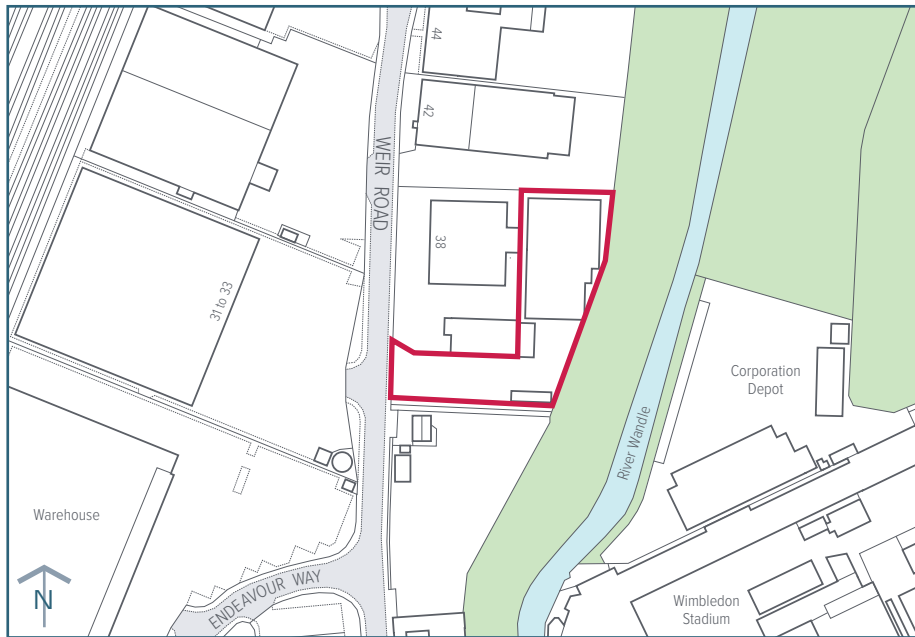
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The plot throughput ratio is above average for this type of facility so there are unlikely to be opportunities to intensify the throughput.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M9** Do you agree this site should be safeguarded for waste uses?

### M10 Maguire Skips, 36 Weir Court, Merton SW19 8UG



Site size (ha)	0.3
Type of facility	Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	53,313
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	42,856 (C&D)

Not to Scale

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**Site Description** Enclosed double-height shed with outside hardstanding space

Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location

**Planning Designations** Strategic Industrial Location  
Archaeological Priority one

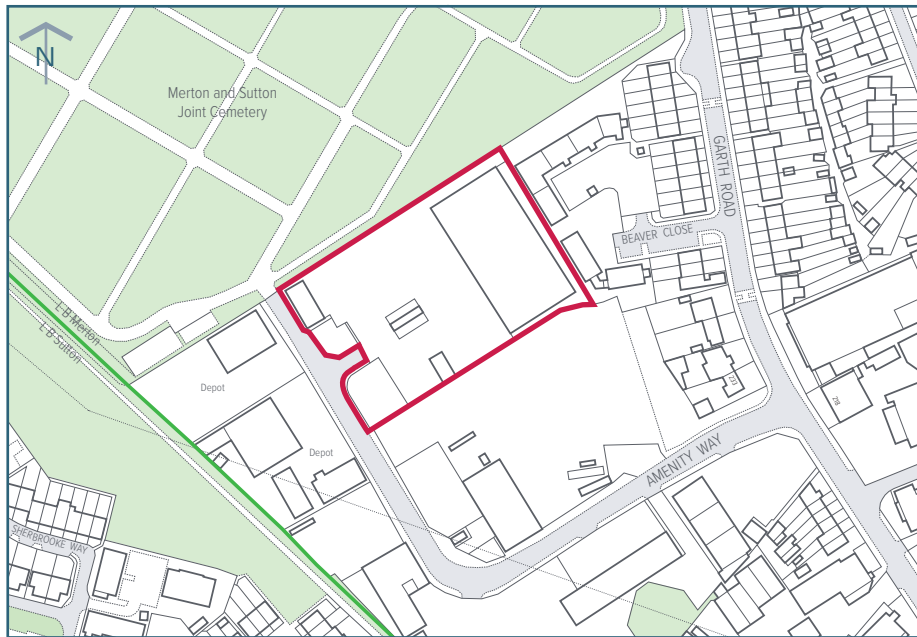
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M10** Do you agree this site should be safeguarded for waste uses?

### M11 Morden Transfer Station, Amenity Way, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	39,950
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

**Site Description**

Double-height industrial shed with hardstanding

The site lies within an industrial location surrounded by similar activities, and flats and a cemetery respectively along its north-eastern and north-western boundaries

**Planning Designations**

Locally Significant Industrial Location

**Currently Safeguarded**

Yes. Site Reference in 2011 SLWP: 25 (as Sloane Demolition)

**Opportunity to increase waste managed**

No. There are no known plans to intensify operations at the facility

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the adjacent cemetery
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M11** Do you agree this site should be safeguarded for waste uses?



### M12 NJB Recycling, 77 Weir Road, Merton SW19 8UG



Not to Scale

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Site size (ha)	0.4
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	48,687
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	18,030 (C&D)

**Site Description** Enclosed triple-height shed with outside hardstanding space for vehicles  
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. The site is adjacent to a Gypsy and Traveller site in Wandsworth

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

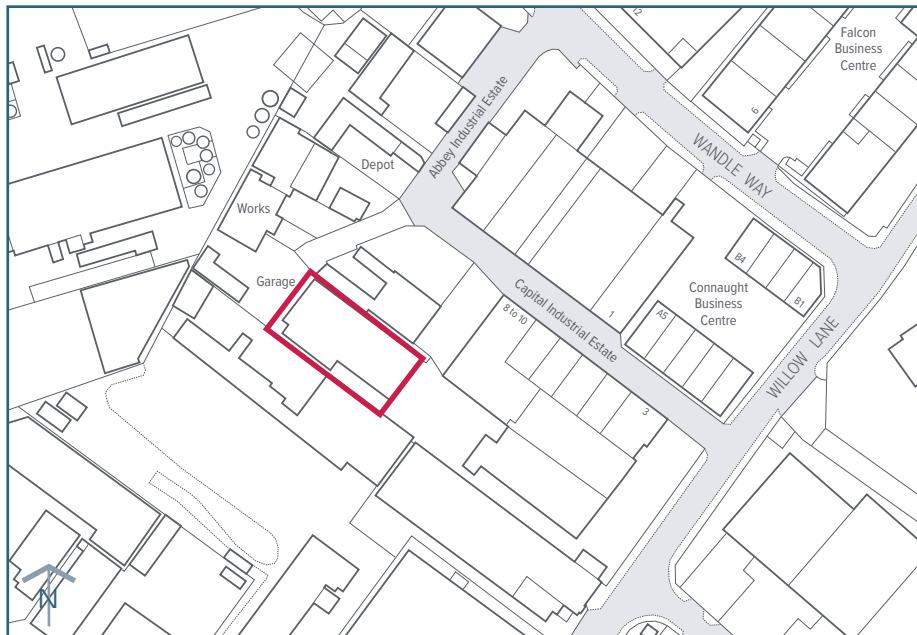
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
  - Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M12** Do you agree this site should be safeguarded for waste uses?

### M13 One Waste Clearance, Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA



Not to Scale

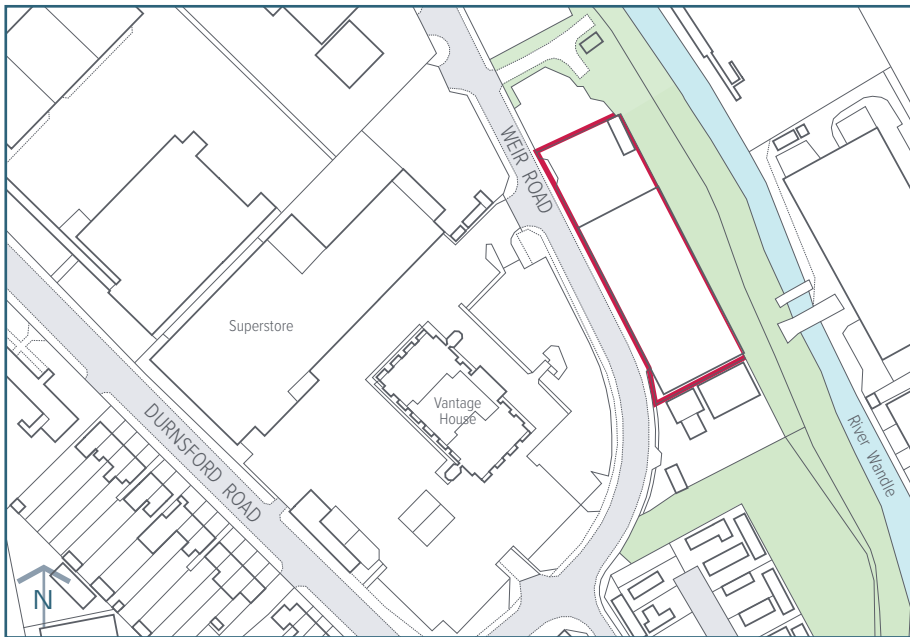
© Crown copyright Licence No. 100019285 (2019)

Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	20,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	13,453 (HCI) 4,547 (C&D)

<b>Site Description</b>	The facility is a fully enclosed industrial unit Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site
<b>Planning Designations</b>	Strategic Industrial Location Archaeological Priority Zone
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	No. The throughput per hectare is based on the few weeks the facility has been operating, which is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form
<b>Issues to consider if there is a further application</b>	Developers planning to intensify the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Evaluating and preserving any archaeological remains</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question M13** Do you agree this site should be safeguarded for waste uses?

**M14 Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton SW19 8UG**



Site size (ha)	0.43
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	71,595
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	30,131 (C&D)

Not to Scale

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**Site Description** Enclosed triple-height shed with outside hardstanding for vehicles  
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Zone

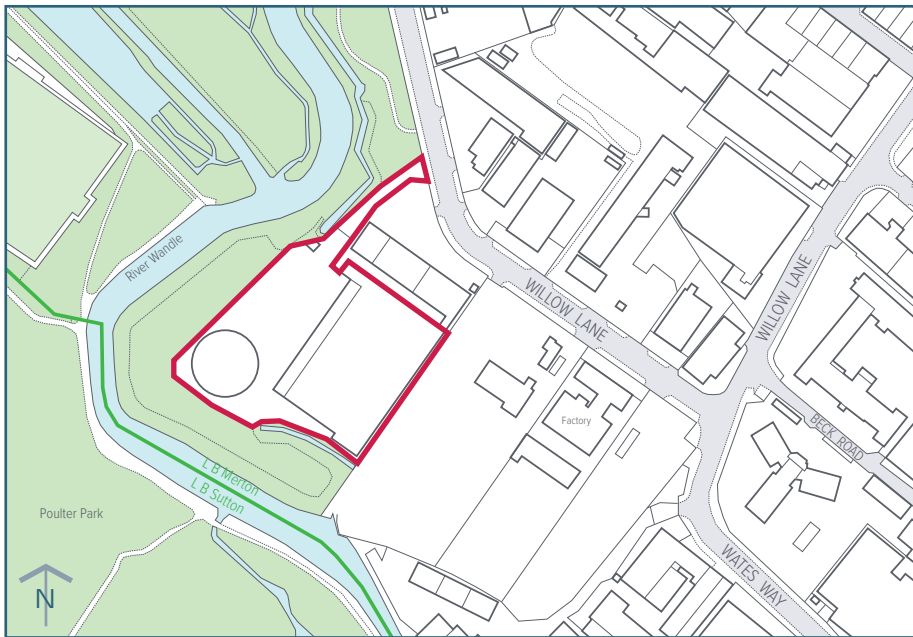
**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 27 (known as the SITA Transfer Station)

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
    - Designing the site so that operations are carried out within a fully enclosed building
    - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
    - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
    - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
    - Evaluating and preserving any archaeological remains
    - Not harming biodiversity in the vicinity
    - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
    - Designing a facility that does not impact on the openness of Metropolitan Open Land
    - Providing appropriate soft landscaping

**Question M14** Do you agree this site should be safeguarded for waste uses?

### M15 Riverside AD Facility, 43 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.9 (includes M16)
Type of facility	Anaerobic Digestion
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	36,341
Licensed capacity (tpa)	99,999
Qualifying throughput (tpa)	46,341 (HCI)

#### Site Description

The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel

The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

#### Planning Designations

Strategic Industrial Location  
Archaeological Priority Zone

#### Currently Safeguarded

Yes. Site Reference in 2011 SLWP: V (known as Vortal)

#### Opportunity to increase waste managed

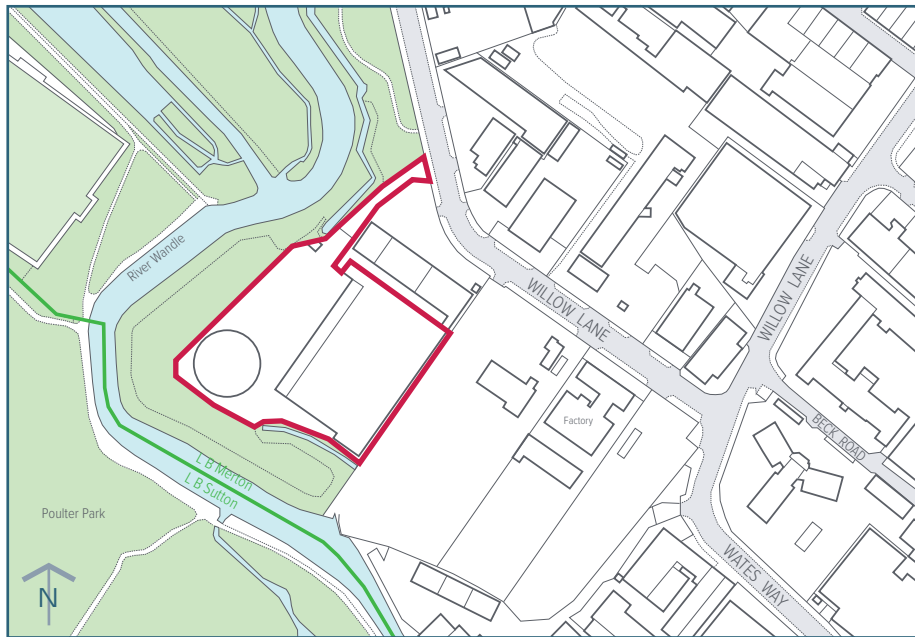
No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

#### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M15** Do you agree this site should be safeguarded for waste uses?

### M16 Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.9 (includes M15)
Type of facility	Composting
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	51,715
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	51,715 (HCI)

**Site Description** The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel

The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

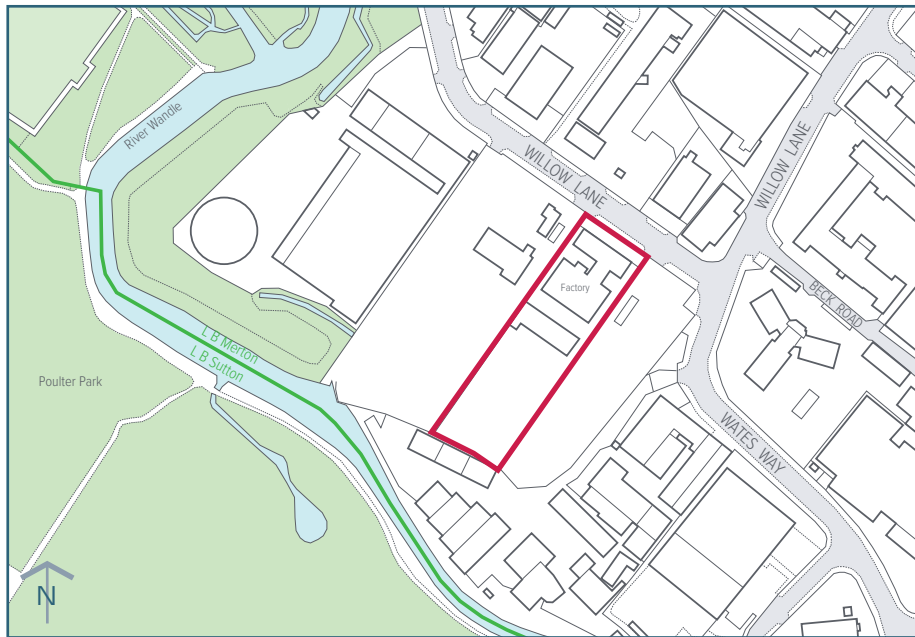
**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: V (known as Vortal)

**Opportunity to increase waste managed** No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question M16** Do you agree this site should be safeguarded for waste uses?

**M17 UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA**



Site size (ha)	0.5
Type of facility	Treatment of waste to produce soil
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	804
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

Not to Scale

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**Site Description** A large site comprising a double-height industrial shed with hardstanding for vehicles, hardstanding for skips and construction, demolition and excavation waste

The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties. The River Wandle lies to the west of the site. Connect House, which was converted to residential use through permitted development lies to the north-east of the site

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Zone

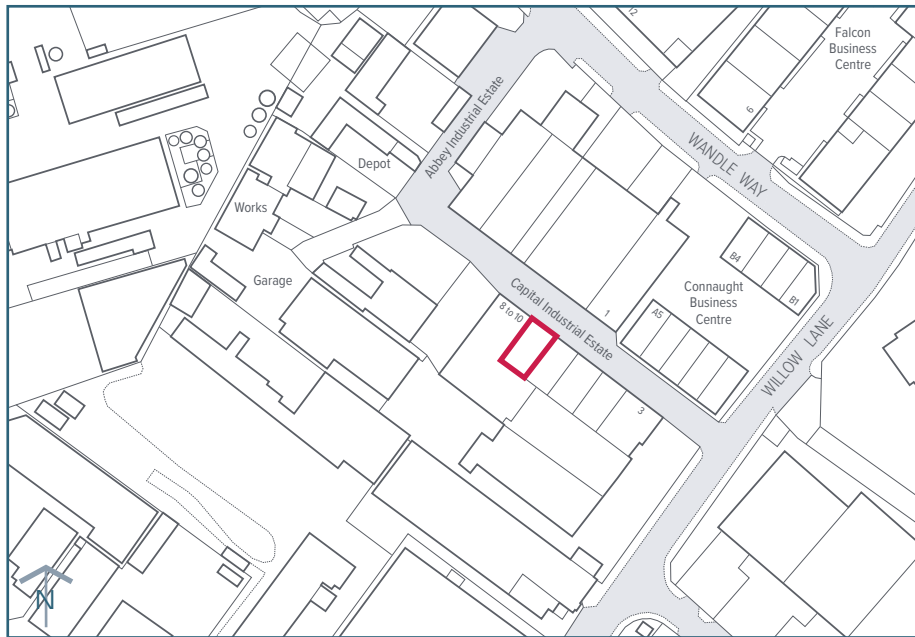
**Currently Safeguarded** No

**Opportunity to increase waste managed** Yes. The site appears to be operating well below its potential as a waste management site and there is the opportunity to intensify operations and increase throughput on the site

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M17** Do you agree this site should be safeguarded for waste uses?

### M18 Wandle Waste Management, Unit 7, Abbey industrial Estate, Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Hazardous,
Maximum throughput tonnes per annum (tpa)	141
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	0

**Site Description**

A double-height industrial shed

The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development lies to the south of the site

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Zone

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

No. The throughput on this site is very small and it is unlikely that there is an opportunity to intensify operations at the site

**Issues to consider if there is a further application**

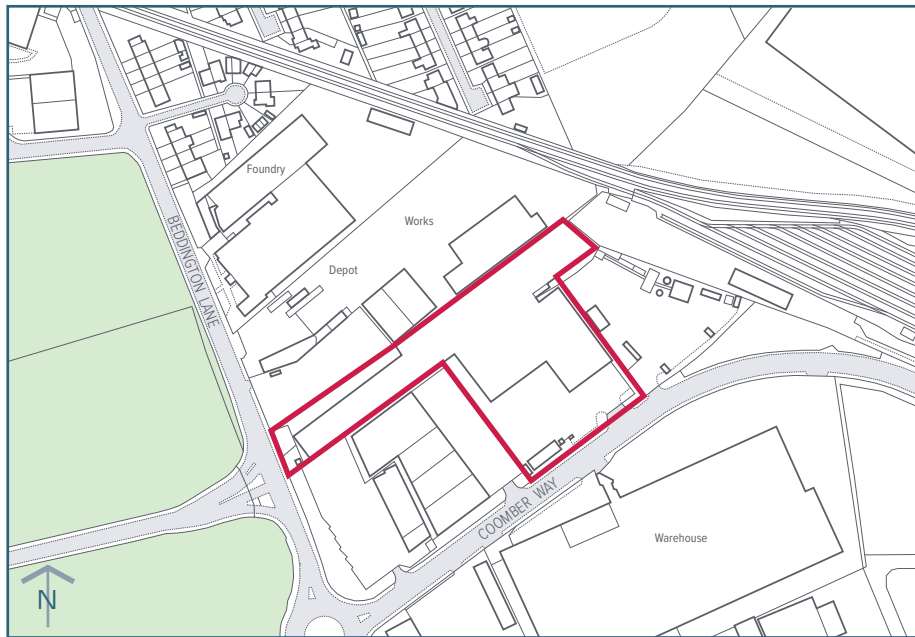
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question M18** Do you agree this site should be safeguarded for waste uses?





### S1 777 Recycling Centre, 154a Beddington Lane, Sutton CRO 4TQ



Not to Scale

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Site size (ha)	1.0
Type of facility	Material Recycling and Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	56,912
Licensed capacity (tpa)	372,600
Qualifying throughput (tpa)	20,625 (HCI) 32,972 (C&D)

**Site Description**

The site comprises large double-height and triple-height modern industrial sheds with hardstanding for skip storage and parking  
 The site is part of a large strategic industrial location, backing on to tram lines to the rear.

**Planning Designations**

Strategic Industrial Location  
 Archaeological Priority Zone

**Currently Safeguarded**

Yes. Site Reference in 2011 SLWP: 21

**Opportunity to increase waste managed**

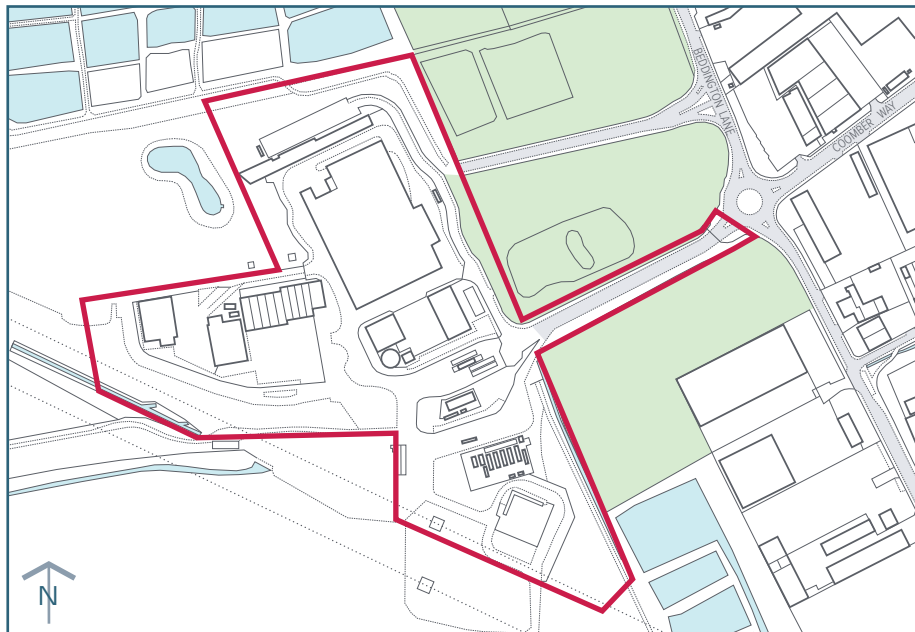
Yes. The site has a current maximum throughput of just under 57,000 tonnes but the operator states they could manage more waste

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S1** Do you agree this site should be safeguarded for waste uses?

## S2 Beddington Farmlands Energy Recovery Facility, Beddington Waste Management Facility, 105 Beddington Lane, Sutton CR0 4TD



Not to Scale

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Site size (ha)	7.44
Type of facility	Energy from waste
Type of waste accepted	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	275,000
Licensed capacity (tpa)	302,500
Qualifying throughput (tpa)	275,000 (HCI)

**Site Description** An energy recovery facility. The facility lies within the Wandle Valley Regional Park and Metropolitan Open Land and is adjacent to the Viridor Recycling Facility and the Beddington Farmlands Landfill site. The land immediately to the east has permission for an extension to the Beddington Strategic Industrial Location

**Planning Designations** Metropolitan Open Land Metropolitan Green Chain  
 Site of Importance for Nature Conservation  
 Land safeguarded for the Wandle Valley Regional Park Archaeological Priority Zone

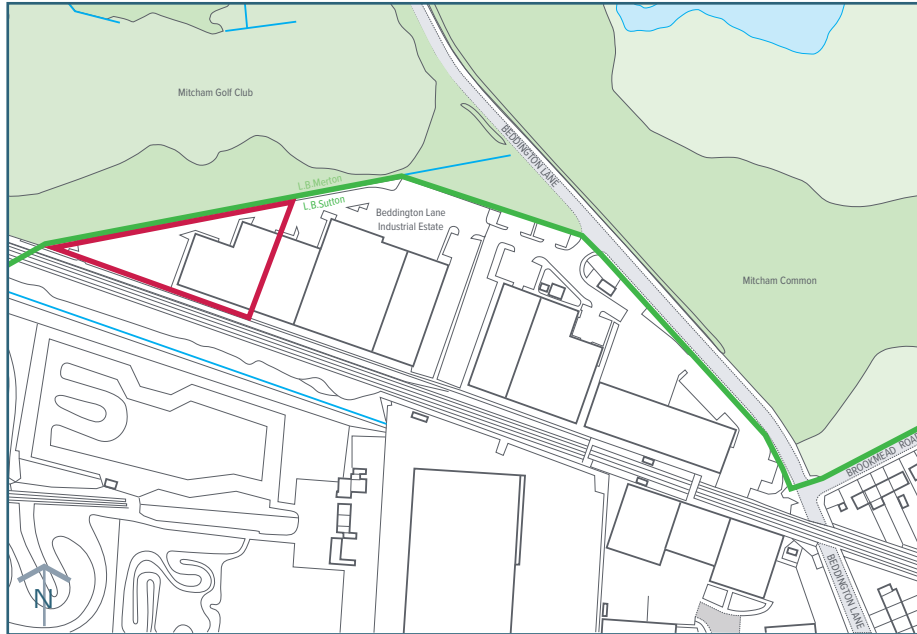
**Currently Safeguarded** No

**Opportunity to increase waste managed** No. This is a new facility and therefore there are no opportunities to upgrade or intensify operations at the current time

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question S2** Do you agree this site should be safeguarded for waste uses?

**S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TD**



Not to Scale

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Site size (ha)	0.2
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	9,601
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

**Site Description** Modern, double-height industrial unit

The Beddington Lane industrial estate lies at the northern end of the Purley Way and Beddington Strategic Industrial Location. It largely comprises large, double-height industrial sheds with some ancillary office space

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded** No

**Opportunity to increase waste managed** Yes. The throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase the throughput.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question S3** Do you agree this site should be safeguarded for waste uses?

**S4 Croydon Transfer Station, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR**



Not to Scale

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Site size (ha)	0.7
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	27,799
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	21,113 (HCI)

**Site Description**

A double- and triple-height enclosed sheds with hardstanding for vehicles  
 The site lies within a large industrial estate (Beddington Strategic Industrial Location) surrounded by similar industrial properties

**Planning Designations**

Strategic Industrial Location  
 Archaeological Priority Area

**Currently Safeguarded**

Yes. Site Reference in 2011 SLWP: 98

**Opportunity to increase waste managed**

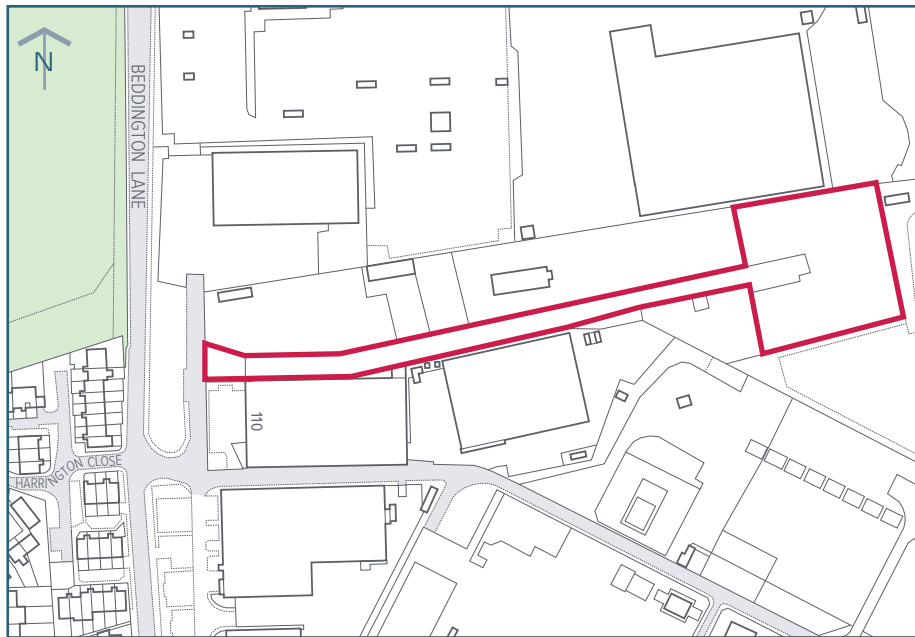
Yes. This site seems to be operating below the average throughput for this type of facility

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S4** Do you agree this site should be safeguarded for waste uses?

### S5 Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton CR0 4YZ



Not to Scale

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Site size (ha)	0.6
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	8,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	5,381 (HCI) 1,819 (C&D)

**Site Description**

Site Description An enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles

The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

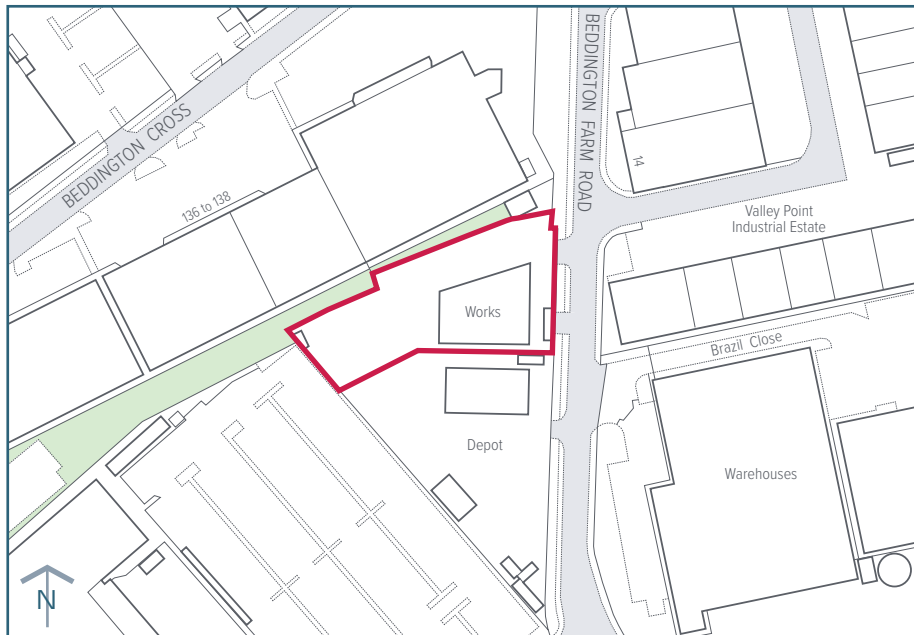
Yes. This is a new facility which has only been operating for a short time. The operational throughput capacity of 8,000tpa has been estimated on the first quarterly return by the company. However, the planning application states that up to 50,000tpa could be managed on site. The estimated throughput is lower than average for this type of facility

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S5** Do you agree this site should be safeguarded for waste uses?

## S6 Hydro Cleansing, Hill House, Beddington Farm Road, Sutton CR0 4XB



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Site size (ha)	0.2
Type of facility	Physical Treatment
Type of waste	Wastewater and Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	13,912
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	0

### Site Description

Fronted by two-storey, 1960s office block with facility to the rear

The site is located on Beddington Farm Road in the Beddington Strategic Industrial Location. It is adjacent to the Surrey Jaguar Centre and the Royal Mail Centre

### Planning Designations

Strategic Industrial Location  
Archaeological Priority Area

### Currently Safeguarded

No

### Opportunity to increase waste managed

No. The throughput per hectare is typical for this type of facility so it is unlikely that it will be able to intensify operations in its current form

### Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S6** Do you agree this site should be safeguarded for waste uses?

### S7 Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton SM3 9QH



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Site size (ha)	0.4
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,799
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	8,640 (HCI)

**Site Description**

Open local authority reuse and recycling centre

The site is located in the north-west of the Kimpton Strategic Industrial Location. The site is opposite the Kimpton Linear Park, which is designated as a Metropolitan Green Chain, Metropolitan Open Land and Public Open Space

**Planning Designations**

Strategic Industrial Location

**Currently Safeguarded**

Yes. Site Reference in 2011 SLWP: 3

**Opportunity to increase waste managed**

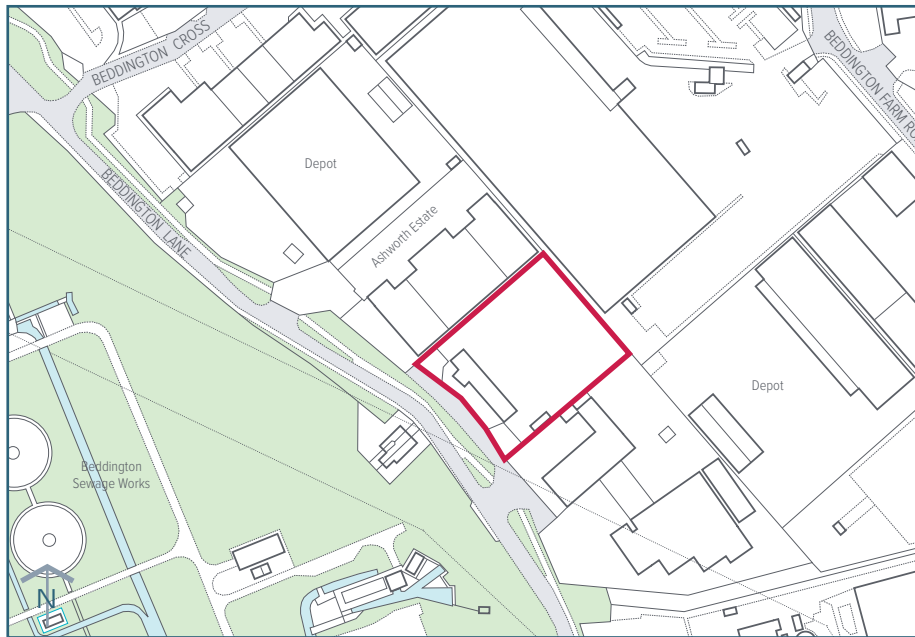
No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the nearby Kimpton Linear Park
  - Designing a facility that does not impact on the openness of Metropolitan Open Land
  - Providing appropriate soft landscaping

**Question S7** Do you agree this site should be safeguarded for waste uses?

### S8 King Concrete, 124 Beddington Lane, Sutton CR0 4YZ



Site size (ha)	0.4
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	1,060
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

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**Site Description** Open site for concrete production and aggregates recovery  
 The site is part of the Beddington Strategic Industrial Location and is surrounded by similar uses

**Planning Designations** Strategic Industrial Location  
 Archaeological Priority Area

**Currently Safeguarded** No

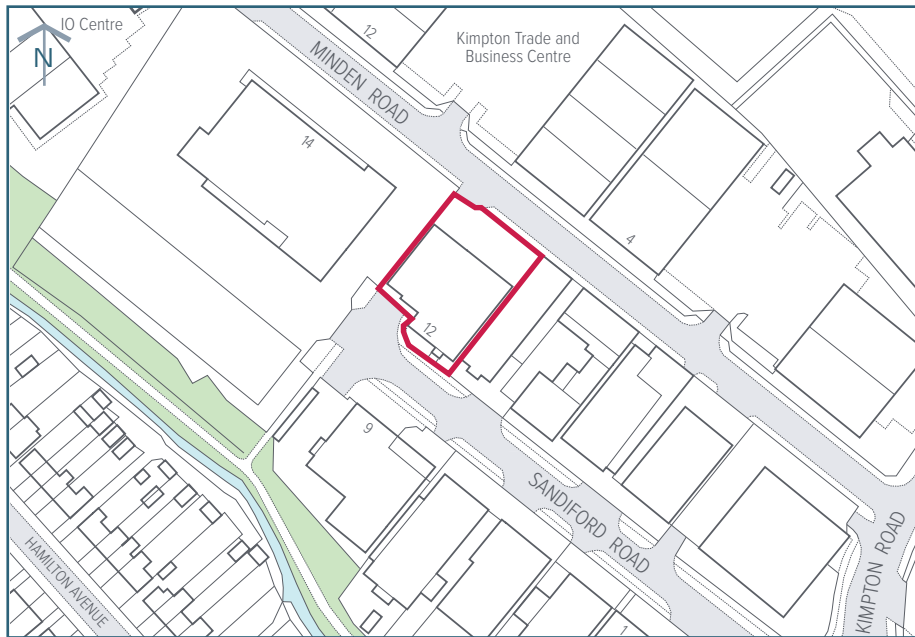
**Opportunity to increase waste managed** Yes. Although not all of the site is a waste recycling facility, it is managing well under the average throughput for this type of facility. The planning application states that the facility will recycle 20,000tpa of Construction, Demolition and Excavation waste on site

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S8** Do you agree this site should be safeguarded for waste uses?



### S9 Premier Skip Hire, Unit 12, Sandiford Road, Sutton SM3 9RD



Not to Scale

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Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	12,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	8,072

**Site Description** Two-storey office and warehouse building with hardstanding for skip storage

The site is located within the Kimpton Strategic Industrial Location and the closest residential properties are 75-100m south and west of the site on Hamilton Avenue

**Planning Designations** Strategic Industrial Location

**Currently Safeguarded** No

**Opportunity to increase waste managed** No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Providing appropriate soft landscaping

**Question S9** Do you agree this site should be safeguarded for waste uses?

**S10 Raven Recycling, Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton  
CR0 4TR**



Site size (ha)	0.3
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	15,224
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	5,310 (HCI) 5,506 (C&D)

Not to Scale

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**Site Description**

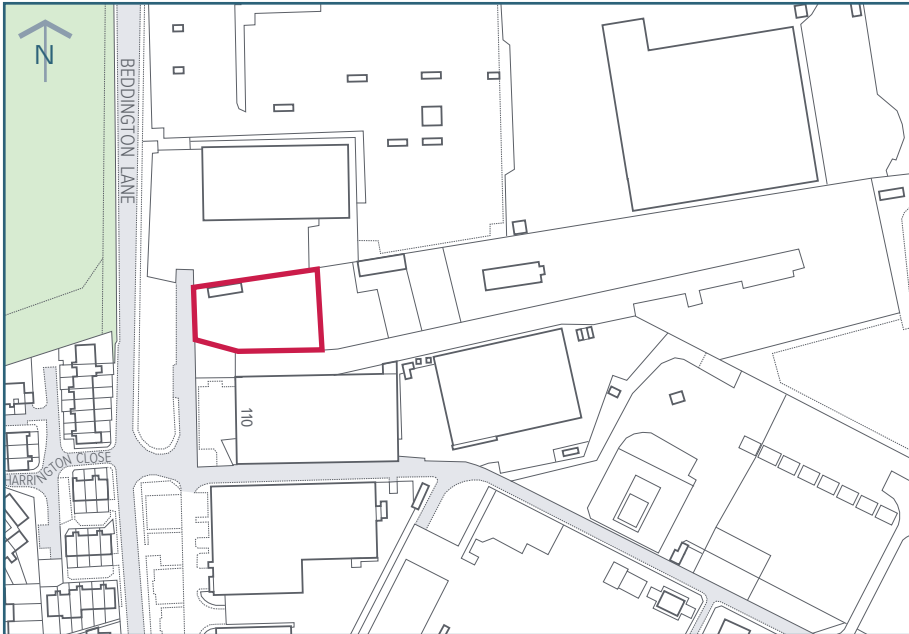
Double-height enclosed sheds with hardstanding for skips

The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

<b>Planning Designations</b>	Strategic Industrial Location Archaeological Priority Area
<b>Currently Safeguarded</b>	No
<b>Opportunity to increase waste managed</b>	No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form
<b>Issues to consider if there is a further application</b>	Developers planning to intensify the safeguarded site should pay particular attention to: <ul style="list-style-type: none"> <li>● Designing the site so that operations are carried out within a fully enclosed building</li> <li>● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site</li> <li>● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads</li> <li>● Providing appropriate soft landscaping</li> </ul>

**Question S10** Do you agree this site should be safeguarded for waste uses?

### S11 TGM Environmental, 112 Beddington Lane, Sutton CR0 4TD



Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	15,000
Qualifying throughput (tpa)	15,000 (HCI)

**Site Description**

The site is currently being used for skip and vehicle storage by Raven Recycling. However the site has planning permission for waste paper and cardboard recovery by TGM Environmental with a throughput of 15,000 tonnes per annum

The site occupies the land to the front of 112 Beddington Lane. The site lies within the Beddington Strategic Industrial Location. And similar uses surround the site.

**Planning Designations**

Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded**

No

**Opportunity to increase waste managed**

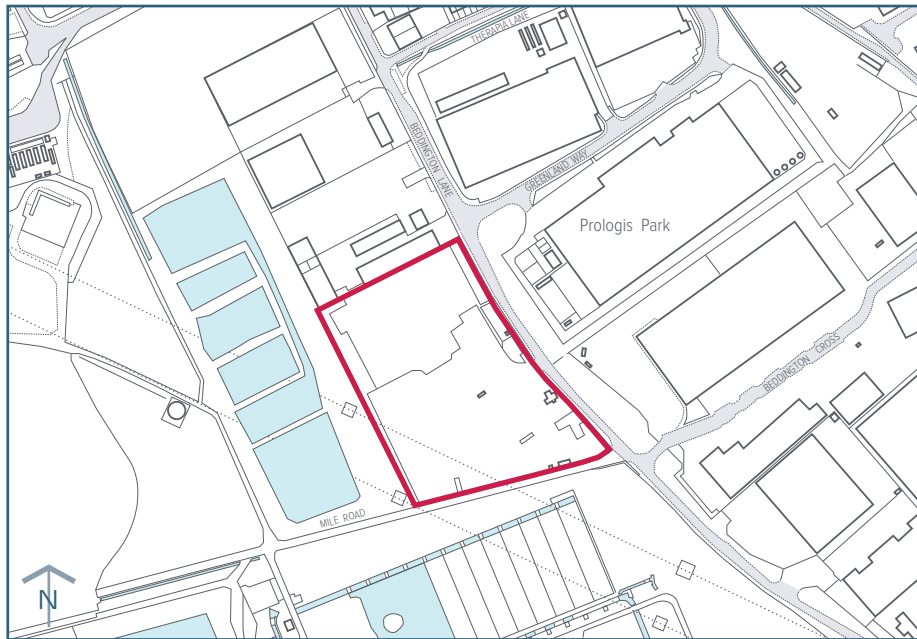
No. The operation has yet to relocate from 156 Beddington Lane. However this site offers additional space to enable the operator to undertake baling on site which did not take place on the previous site. The throughput is average for the size of the site and so it is unlikely that the facility can be intensified in its current form.

**Issues to consider if there is a further application**

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Minimising flood risk on- and off-site
  - Evaluating and preserving any archaeological remains
  - Providing appropriate soft landscaping

**Question S11** Do you agree this site should be safeguarded for waste uses?

## S12 Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH



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Site size (ha)	2.8
Type of facility	Treatment with Transfer Station
Type of waste accepted	Household, Commercial and Industrial (HCI), Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	350,000
Qualifying throughput (tpa)	305,000 (HCI and C&D)

**Site Description** The site is currently vacant but the new planning permission proposal is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring. The site occupies the land to the west of Beddington Lane. It is surrounded by the proposed Wandle Valley Regional Park, Beddington Lane and industrial units to the north.

**Planning Designations** Strategic Industrial Location  
Archaeological Priority Area

**Currently Safeguarded** Yes. Site Reference in 2011 SLWP: 17

**Opportunity to increase waste managed** No. The site has only recently been granted planning permission so no increase in the waste managed is likely to take place.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
  - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
  - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
  - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
  - Protecting the amenity of those using the future Wandle Valley Regional Park
  - Evaluating and preserving any archaeological remains
  - Not harming biodiversity in the vicinity
  - Ensuring nearby watercourses are not harmed by the development
  - Designing a facility that does not impact on the openness of Metropolitan Open Land

**Question S12** Do you agree this site should be safeguarded for waste uses?



## Appendix 1 Sites Counting Towards the Apportionment and C&D Target

Ref	Name	Household/C&I	C&D	Potential for Intensification
<b>Croydon Capacity</b>				
C1	Able Waste Services	0	43,268	
C2	Croydon Car Spares	241	0	
C3	Curley Skip Hire	0	0	
C4	Days Aggregates Purley Depot	0	0	
C5	Factory Lane Waste Transfer Station	9,623	5,206	Yes
C6	Fishers Farm Reuse and Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Materials	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Civic Amenity Site	6,684	0	
C11	Safety Kleen	0	0	Yes
C11	Safety Kleen	0	0	Yes
C12	Stubbs Mead Depot	0	0	Yes
CEX	Exempt Sites	7,580	0	
Croydon Total		<b>32,883</b>	<b>48,474</b>	
<b>Kingston Capacity</b>				
K1	Chessington Equestrian Centre	0	0	
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Civic Amenity Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
Kingston Total		<b>35,642</b>	<b>0</b>	
<b>Merton Capacity</b>				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M4	Garth Road Civic Amenity Site	9,866	0	
M5	Garth Road Transfer Station	15,704	0	
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management (Willow Lane)	0	33,845	
M9	Maguire Skips (Wandle Way)	0	0	
M10	Maguire Skips (Weir Court)	0	42,856	
M11	Morden Transfer Station	0	0	
M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	

Ref	Name	Household/C&I	C&D	Potential for Intensification
<b>Merton Capacity</b>				
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	Yes
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites (including M3: Deadman Confidential)	6,000	0	Yes
Merton Total		<b>213,179</b>	<b>150,183</b>	
<b>Sutton Capacity</b>				
S1	777 Recycling Centre	20,625	32,972	Yes
S2	Beddington Farmlands Energy Recovery Facility	275,000	0	
S3	Cannon Hygiene	0	0	Yes
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Civic Amenity Site	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Country Waste Skip Hire	305,000	0	
SEX	Exempt Sites	500	0	
Sutton Total		<b>664,641</b>	<b>43,025</b>	
<b>South London Capacity</b>				
Croydon		32,883	48,474	
Kingston		35,642	0	
Merton		213,179	150,183	
Sutton		664,641	43,025	
South London Total		<b>946,345</b>	<b>241,682</b>	
<b>South London Capacity Gap</b>				
South London Capacity		946,345	241,682	
South London Targets		929,750	414,380	
Capacity Gap		<b>+16,565</b>	<b>-172,698</b>	

## Appendix 2 Sites and Areas from the 2011 South London Waste Plan

Ref	Name	Borough	Fate
<b>Safeguarded Sites</b>			
1	Factory Lane Waste Transfer Station	Croydon	Safeguarding carried forward as Site C5
2	Fisher's Farm Civic Amenity Site	Croydon	Safeguarding carried forward as Site C6
3	Kimpton Civic Amenity Site	Sutton	Safeguarding carried forward as Site S7
4	Purley Oaks Civic Amenity Site	Croydon	Safeguarding carried forward as Site C10
5	Pear Tree Farm Waste Transfer Station	Croydon	Safeguarding carried forward as Site C9
6	Kingston Civic Amenity Site	Kingston	Safeguarding carried forward as Site K3
9	Garth Road Civic Amenity Site	Merton	Safeguarding carried forward as Site M4
17	Country Waste Recycling Ltd	Sutton	Safeguarding carried forward as SiteS12
18	Viridor Recycling and Composting Centre	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park
19	SE Skips/Waste World Ltd	Merton	Company replaced on Site M8 by LMD Waste Management
21	777 Recycling	Sutton	Safeguarding carried forward as Site S1
22	B Nebbett and Son	Merton	Company relocated and capacity transferred to Site M12
23	Five Star Japanese Autos	Merton	No longer managing waste in the area according to the Environment Agency
25	Sloane Demolition	Merton	Safeguarding carried forward as Site M11 (now known as Morden Transfer Station)
26	Weir Road Civic Amenity Site	Merton	Closed and capacity transferred to Site M4: Garth Road Civic Amenity Site
27	SITA Transfer Station	Merton	Company replaced on Site M14 by Reston Waste Management
97	Sevenside Waste Paper	Sutton	Closed and capacity transferred to Site S11: TGM Environmental
98	Croydon Transfer Station	Sutton	Safeguarding carried forward as Site S4
100	European Metal Recycling (Therapia Lane)	Sutton	Closed and long-term vacant. Company relocated and capacity transferred to Site M2
101	Rentokil Initial Services Ltd	Merton	No longer managing waste in the area according to the Environment Agency
126	Benedict's Wharf Transfer Station	Merton	Closing and capacity transferred to Site S12: Country Waste Skip Hire
A	SafetyKleen	Croydon	Safeguarding carried forward as Site C11
B	Stubbs Mead Depot	Croydon	A feasibility study is being undertaken to understand the Local Plan housing allocation. It is due to be reported on in late October 2019. Safeguarding carried forward as Site C12.
V	Vertal	Merton	Safeguarding carried forward as Site M16 (now known as Riverside Bio)
BF	Beddington Farmlands Landfill	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park



Ref	Name	Borough	Fate
<b>Areas With Sites Which May Be Suitable For Waste Facilities</b>			
169	Willow Lane Industrial Estate	Merton	No longer needed
99	Purley Oaks Highways Depot	Croydon	No longer needed
102	Purley Way, Lysander Way, Imperial Way Industrial Estate	Croydon	No longer needed
105	Factory Lane Industrial Estate	Croydon	Safeguarding on part of area carried forward as Site C5
125	Factory Lane Industrial Estate (South Side)	Croydon	No longer needed
351	Chessington Industrial Estate	Kingston	No longer needed
252	Chessington Industrial Estate	Kingston	No longer needed
253	Chessington Industrial Estate	Kingston	No longer needed
491	Kimpton Industrial Estate	Sutton	No longer needed
532	Beddington Lane Industrial Estate	Sutton	No longer needed
533	Beddington Lane Industrial Estate	Sutton	No longer needed
534	Beddington Lane Industrial Estate	Sutton	No longer needed
535	Beddington Lane Industrial Estate	Sutton	No longer needed
539	Beddington Lane Industrial Estate	Sutton	No longer needed
5312	Beddington Lane Industrial Estate	Sutton	No longer needed
641	Durnsford Road Industrial Estate	Merton	No longer needed
642	Durnsford Road Industrial Estate	Merton	No longer needed
702	Garth Road Industrial Estate	Merton	No longer needed
1006	Wandle Valley Industrial Estate	Sutton	No longer needed

**Question Appendix 2** Do you agree with the approach of carrying forward only existing sites from the 2011 South London Waste Plan?

**Question Other** Is there anything that any other aspect of waste planning in South London that the plan ought to contain?  
(To cover Regulation 18)



## Appendix 3 Glossary

### Anaerobic Digestion

Organic matter broken down by bacteria in the absence of air, producing a gas (methane) and liquid (digestate). The by-products can be useful, for example biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used on farms as a fertiliser

### Circular Economy

A circular economy is an alternative to a traditional linear economy (make-use-dispose).

In the circular economy:

- resources are kept in use for as long as possible,
- the maximum value is extracted from them while in use,
- products and materials are recovered and regenerated at the end of each service life.

### Commercial Waste

Controlled waste arising from trade premises

### Construction, Demolition & Excavation Waste

Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures

### DEFRA - Department for Environment, Food and Rural Affairs

Defra is a UK Government department. Its mission is to enable everyone to live within our environmental means. This is most clearly exemplified by the need to tackle climate change internationally, through domestic action to reduce greenhouse gas emissions, and to secure a healthy and diverse natural environment

### Environment Agency

A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice

### Exemption

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within

### Hazardous Landfill

Sites where hazardous waste is landfilled. This can be a dedicated site or a single cell within a non-hazardous landfill, which has been specifically designed and designated for depositing hazardous waste

### Hazardous Treatment

Sites where hazardous waste is treated so that it can be landfilled

### Hazardous Waste

Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste

### HCI

Household, Commercial and Industrial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HCI is used to describe the throughput where a facility manages both waste streams

### Household Waste

Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders themselves take to household waste recovery centres and “bring sites”

### Industrial Waste

Waste from a factory or industrial process

### Inert waste

Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater

### Inert Landfill

A landfill site that is licensed to accept inert waste for disposal

### In-Vessel Composting

A system that ensures composting takes place in an enclosed but aerobic (in the presence of oxygen) environment, with accurate temperature control and monitoring. There are many different systems, but they can be broadly categorised into six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls

### ILW - Intermediate level radioactive waste

Radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities

### Local Authority Collected Waste (LACW)

Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials

### Landfill

The permanent disposal of waste into the ground, by the filling of man-made voids or similar features

### Landfill Directive

European Union requirements on landfill to ensure high standards for disposal and to stimulate waste minimisation

### LLW – low level radioactive waste

Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

### Materials Recycling Facility (MRF)

A facility for sorting and packing recyclable waste

### Mechanical Biological Treatment (MBT)

The treatment of residual waste using a combination of mechanical separation and biological treatment

### Non-Hazardous Landfill

A landfill which is licensed to accept non-inert (biodegradable) wastes e.g. household and commercial and industrial waste and other non-hazardous wastes (including inert) that meet the relevant waste acceptance criteria

### Non-Inert

Waste that is potentially biodegradable or may undergo significant physical, chemical or biological change once landfilled

### Organic Waste

Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste

### Open Windrow Composting

A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue

**Proximity Principle**

Requires that waste should be managed as near as possible to its place of production, reducing travel impacts

**Recovery**

Value can be recovered from waste by recovering materials through recycling, composting or recovery of energy

**Recycled Aggregates**

Aggregates produced from recycled construction waste such as crushed concrete and planings from tarmac roads

**Recyclate**

Raw material sent to, and processed in, a waste recycling plant or materials recovery facility (e.g. plastics, metals, glass, paper/card)

**Recycling**

The reprocessing of waste either into the same product or a different one

**Residual Waste**

Waste remaining after materials for re-use, recycling and composting have been removed

**Waste Electrical and Electronic Equipment (WEEE)**

End of life electrical or electronic equipment and covers virtually everything with a plug or battery. There are specific sites for the depollution, disassembly, shredding, recovery or preparation for disposal. The sites must meet the EU's WEEE Directive.

**Waste Hierarchy**

A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal of this waste.

**Waste Local Plan**

A statutory development plan prepared (or saved by the waste planning authority, under transitional arrangements), setting out policies in relation to waste management and related developments

**Waste Minimisation / Reduction**

The most desirable way of managing waste, by avoiding the production of waste in the first place

**Waste Planning Authority (WPA)**

The local authority responsible for waste development planning and control. They are unitary authorities, including London Boroughs and the City of London, National Park Authorities, and county councils in two-tier areas.

The WPAs for the South London Waste Plan are

- London Borough of Croydon,
- Royal Borough of Kingston,
- London Borough of Merton, and
- London Borough of Sutton

**Waste Regulation Authority**

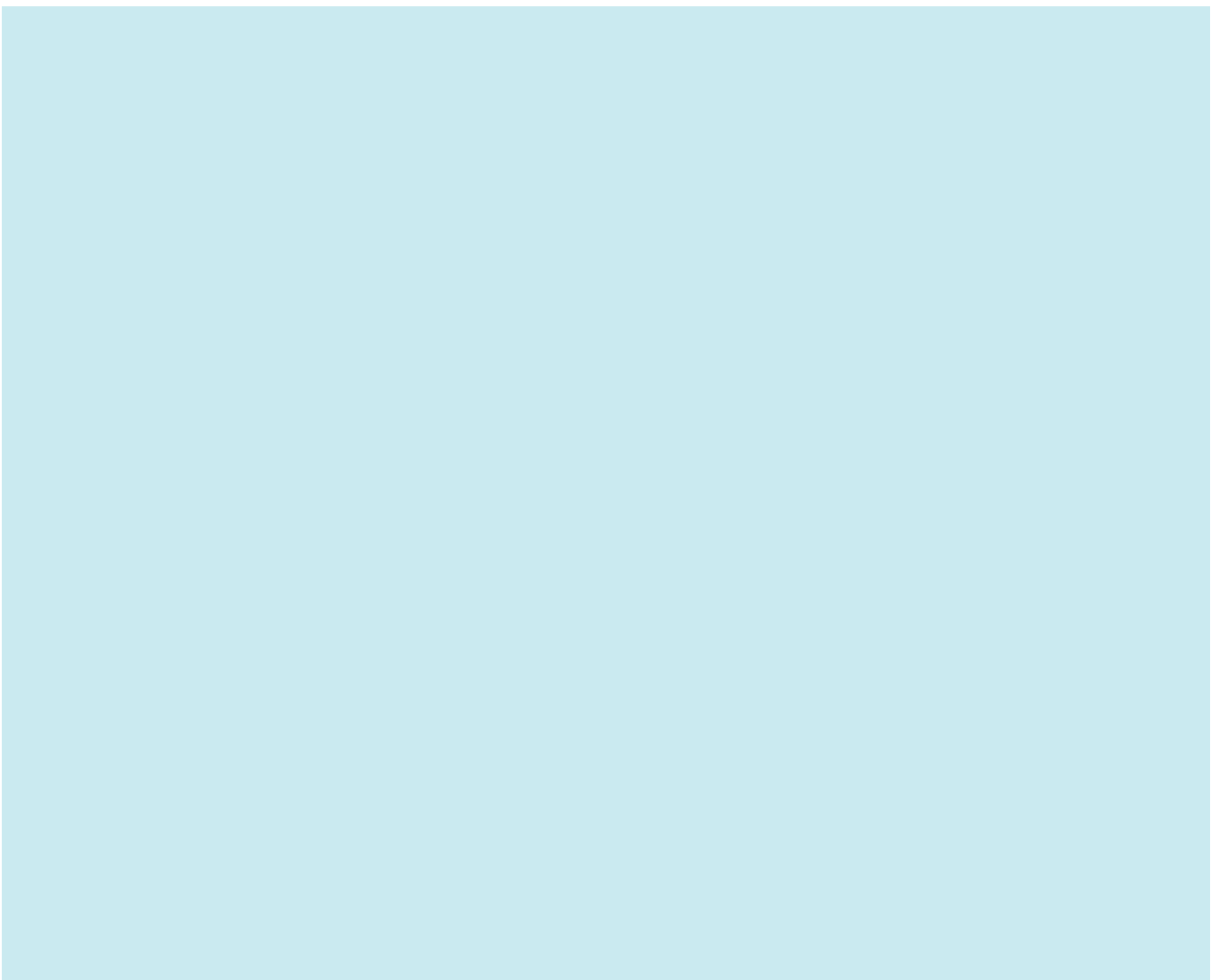
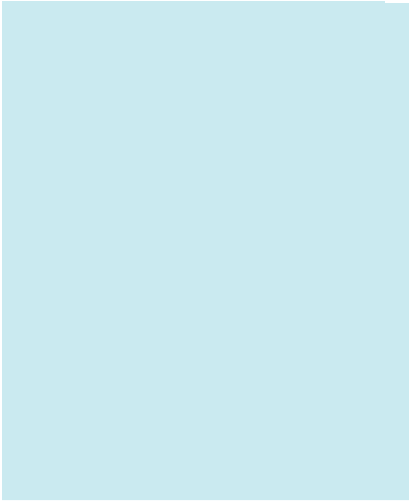
The Environment Agency has responsibility for authorising waste management licenses for disposal facilities and for monitoring sites

**Waste Transfer Station**

A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal. Although in practice, usually some recycling and management takes place as part of the sorting and baling.











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South London Waste Planning Authorities

# South London Waste Technical Paper

Report prepared by: Hannah Dick & Victoria Manning

Report Approved by: Peter Scholes

Date: 21<sup>st</sup> June 2019

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# South London Waste Technical Paper

Client: South London Waste Plan Boroughs

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## Executive summary

### Introduction

The London boroughs of Croydon, Kingston, Merton and Sutton adopted the South London Waste Plan (SLWP) in March 2012, covering the period 2011 to 2021. The four partner boroughs have carried out this updated review of waste capacity and need in South London to support delivery of a replacement SLWP which is anticipated to be adopted by 2021-22, to cover the time period 2021-2036.

The purpose of this study is to provide an up to date evidence base, upon which the South London Waste Plan can be prepared. This waste evidence base sets out the key information and data on waste issues in South London, provides analysis and makes recommendations on the most appropriate approach to planning for each of the seven waste streams for the South London Boroughs to take forward in a new South London Waste Plan.

As waste planning authorities (WPAs), all four of the boroughs have a statutory duty to prepare a waste local plan in line with Article 28 of the Waste Framework Directive (2008). This plan must set out an analysis of the current waste management situation and sufficient information on the locational criteria for site identification and on the capacity of future disposal or major recovery installations.

The “National Planning Policy for Waste” (NPPW), published in 2015, sets out the Government’s waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW is supplemented by the “Planning Practice Guidance” section on waste which provides further detail on how to implement the policies.

The NPPW states that waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

### Apportionment Waste Arisings Estimates and Forecasts

Household and Commercial & Industrial (C&I) wastes are the apportioned waste streams. While in the existing London Plan, the apportionment targets were broken down into these constituent elements, the draft new London Plan (Tables 9.1 and 9.2) does not provide this breakdown.

In order to calculate whether there is sufficient waste management infrastructure within the SLWP area, the draft new apportionment figures have been used, rather than estimating actual arisings. The apportionment targets for each authority have been used to calculate the targets for the intervening years i.e. between 2021 and 2041. The figures for 2016 have been taken from the existing London Plan. Table 1 shows the forecast apportioned waste over the Plan period.

Most of the boroughs within the SLWP area, have been set apportionment targets higher than their anticipated waste arisings, with the exception of Croydon, which has actually been set a lower target. Collectively the apportionment is higher than the anticipated arisings.

Table 1: Apportioned waste by forecast year (tonnes per annum)

Area	2016	2021	2026	2031	2036
Croydon	273,000	252,000	256,000	260,000	264,000
Kingston	143,000	187,000	190,000	193,000	196,000
Merton	161,000	238,000	241,750	245,500	249,250
Sutton	155,000	210,000	213,500	217,000	220,500
<b>Total</b>	<b>732,000</b>	<b>887,000</b>	<b>901,250</b>	<b>915,500</b>	<b>929,750</b>

Source: GLA, Draft London Plan, 2018

## Arisings and Forecasts of other waste types

### *Construction, Demolition & Excavation Waste Arisings*

Table 2 shows both the current and forecasted CD&E waste arisings. Figures for 2017 are actuals taken from the Environment Agency's Waste Data Interrogator (WDI), and this has been forecast using GLA's employment figures in the construction sector until 2036. The results figures show an increase from 508kt to 551kt by 2036.

Table 2: Forecast CD&E waste arisings for each borough and for SLWP area (tonnes per annum)

Area	Waste Source	Waste Type	2017	2021	2026	2031	2036
Croydon	C&D	Inert/C+D	282,613	292,593	294,629	300,542	304,303
		Hazardous	364	377	380	388	392
	Excavation	Inert/C+D	53,198	55,077	55,460	56,573	57,281
		Hazardous	5,458	5,651	5,690	5,804	5,877
	Total		341,634	353,698	356,158	363,307	367,853
Kingston	C&D	Inert/C+D	37,530	37,850	38,242	39,002	39,002
		Hazardous	36	37	37	38	38
	Excavation	Inert/C+D	28,037	28,276	28,569	29,137	29,137
		Hazardous	-	-	-	-	-
	Total		65,604	66,162	66,848	68,176	68,176



Area	Waste Source	Waste Type	2017	2021	2026	2031	2036
Merton	C&D	Inert/C+D	46,243	47,956	50,051	52,081	54,016
		Hazardous	19	19	20	21	22
	Excavation	Inert/C+D	27,047	28,048	29,274	30,461	31,593
		Hazardous	201	208	218	226	235
	Total		73,510	76,232	79,563	82,789	85,865
Sutton	C&D	Inert/C+D	15,478	15,638	15,834	16,214	16,576
		Hazardous	29	29	30	30	31
	Excavation	Inert/C+D	11,071	11,185	11,326	11,597	11,856
		Hazardous	576	582	589	603	617
	Total		27,154	27,434	27,778	28,445	29,080
SLWP	C&D	Inert/C+D	381,865	394,036	398,756	407,838	413,897
		Hazardous	448	463	467	477	483
	Excavation	Inert/C+D	119,353	122,586	124,628	127,768	129,867
		Hazardous	6,235	6,441	6,497	6,634	6,729
	Total		507,901	523,526	530,348	542,717	550,975

Source: Anthesis

### ***Low Level Radioactive Waste***

According to the Environment Agency's public register, there are ten organisation holding 13 permits to keep and use radioactive materials in the constituent authorities of the SLWP. These are mainly hospitals, universities and private companies. Any discharges from these permitted facilities to air, water (including discharges to sewer) and land are regulated and monitored under the Pollution Prevention and Control (PPC) regime. The latest dataset (2017) identified small permitted discharges to sewer with the SLWP area but no solid waste transfer, and therefore this waste places no requirement on the SLWP solid waste management infrastructure. Therefore, no forecasts are required or have been carried out on this type of waste.

### *Agricultural Waste*

Data from WDI shows that only 383 tonnes of waste, coded as from agricultural sources (i.e. EWC 02 01) were generated within the SLWP area in 2017. Given the relatively small tonnage of this waste and the predominantly urban character of the borough, it is not considered to need specific consideration.

### *Hazardous Waste*

Data from the Environment Agency's Hazardous WDI has been used for 2017 as the baseline year. However, these tonnages are in reality also included in the tonnages presented in the household & C&I waste (i.e. apportioned waste) and CD&E. This has been forecast using growth rates in the GLA's draft London Plan C&I waste arisings. Table 3 shows that this is expected to rise from 20.2ktpa to 21.6ktpa by 2036.

Table 3: Hazardous waste arisings in the South London area (tonnes per annum)

<b>Area</b>	<b>2017 (baseline)</b>	<b>2021</b>	<b>2026</b>	<b>2031</b>	<b>2036</b>
Croydon	8,514	9,008	9,008	9,008	9,193
Kingston	2,404	2,404	2,404	2,404	2,432
Merton	4,325	4,591	4,591	4,591	4,685
Sutton	4,936	5,239	5,239	5,239	5,303
<b>Total</b>	<b>20,180</b>	<b>21,242</b>	<b>21,242</b>	<b>21,242</b>	<b>21,612</b>

Source: Hazardous Waste Data Interrogator, 2017 (baseline)

### *Wastewater*

Thames Water is responsible for wastewater and sewage sludge treatment in London and manages sewerage infrastructure as well as sewage treatment works. Wastewater quantities are expected to increase from 52.9 million m<sup>3</sup>/yr to 55.7 million m<sup>3</sup>/yr.

The four boroughs are served across Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works (STW). Thames Water have informed us that these all have adequate capacity to manage the incoming sewage and have all had major capacity increases during Asset Management Plan (AMP) 5 (2010 to 2015) and/or AMP6 (2015 to 2020).

## Waste Capacity Assessment

### *Apportionment criteria*

Current and future waste management capacity in the SLWP area has been established using a number of data sources, including Environment Agency “active sites” data, WDI and permitting data. For each site, its assumed operational capacity was assessed against the criteria included in the draft London Plan i.e. waste is deemed to be managed in London if:

- it is used in London for energy recovery;
- it relates to materials sorted or bulked in London facilities for reuse, reprocessing or recycling;
- it is reused, recycled or reprocessed in London; and
- it is produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum<sup>1</sup>.

Transfer stations – where material is bulked for transportation to other waste management facilities, this capacity was not included as a contribution towards the apportionment targets. However, where a degree of recycling takes place in the operation of the facility (gleaned from Environment Agency output data) this recycling capacity was included.

Exempt sites – were included where capacity met the requirements of the London Plan. A list of exemptions assumed relevant to the London Plan apportionment, and assumed capacities per site, are given in section 5.2.3 of this report.

### Waste capacity gaps

The aggregated capacity for all four boroughs within the SLWP area, which counts towards meeting the apportionment, is in Table 4. It shows that capacity is due to decrease, as the Viridor Recycling & Composting Centre within LB Sutton is subject to a temporary planning permission until 2023. Overall the capacity gap will increase from 117ktpa in 2021 to 182ktpa by 2036, due to this site loss and an increasing apportionment target.

---

<sup>1</sup> Refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns. The written contract must include the end-user’s technical specifications relating as a minimum to the calorific value, the moisture content, the form and quantity of the RDF.

Table 4: Apportionment capacity, targets and calculated capacity gap for SLWP area (tonnes per annum)

Management option	2021	2026	2031	2036
Transfer	281,299	259,225	259,225	259,225
Recycling and Reuse	96,809	96,809	96,809	96,809
Composting, AD and Land spread	98,056	98,056	98,056	98,056
Energy from waste	275,000	275,000	275,000	275,000
Exemptions	19,080	19,080	19,080	19,080
<b>Total</b>	<b>770,244</b>	<b>748,170</b>	<b>748,170</b>	<b>748,170</b>
Apportionment	887,000	901,250	915,500	929,750
<b>Capacity gap</b>	<b>116,756</b>	<b>153,080</b>	<b>167,330</b>	<b>181,580</b>
Land requirement (ha) <sup>2</sup>	1.95	2.55	2.79	3.03

Source: Anthesis

Table 5 shows that the aggregated capacity gap for C&D waste increases from 148ktpa in 2021 to 168ktpa into 2036, due to anticipated increased C&D waste generation.

---

<sup>2</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.

Table 5: Management capacity for C&D waste, arisings and calculated capacity gap (tonnes per annum)

Management Option	2021	2026	2031	2036
Transfer	213,146	213,146	213,146	213,146
Recycling and Reuse	32,972	32,972	32,972	32,972
<b>Total Capacity</b>	<b>246,118</b>	<b>246,118</b>	<b>246,118</b>	<b>246,118</b>
C&D waste arisings	394,499	399,223	408,315	414,380
<b>Capacity gap</b>	<b>148,381</b>	<b>153,105</b>	<b>162,197</b>	<b>168,262</b>
Land requirement (ha) <sup>3</sup>	2.47	2.55	2.70	2.80

Source: Anthesis

Table 6 shows that the overall capacity increases from 265ktpa to 350ktpa by 2036, meaning the estimated land requirement for additional sites increases from 4.42 to 5.83 hectares. An average throughput of waste management sites of 60,000 tonnes per hectare year has been used for this estimation, based on a data of other waste management sites (explained in more detail in Appendix 3).

Table 6: Summary of capacity gaps for SLWP (tonnes per annum)

	2021	2026	2031	2036
Target	1,281,499	1,300,473	1,323,815	1,344,130
Capacity	1,016,362	994,288	994,288	994,288
<b>Capacity gap</b>	<b>265,137</b>	<b>306,185</b>	<b>329,527</b>	<b>349,842</b>
Land requirement (ha) <sup>4</sup>	4.42	5.10	5.49	5.83

Source: Anthesis

<sup>3</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.

<sup>4</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.

## Exports & Imports

In total for LACW and C&I (apportioned) waste streams, for 2017, the SLWP area exported 309,700 tonnes but 'received' ~620,000 tonnes of apportioned waste which wasn't identified as being generated within the four boroughs. This would suggest that the SLWP area is a net importer of waste. However, a very large proportion of the imports were non-codeable (ie. origin data not provided), and therefore some of this waste is likely to have been generated within the SLWP area boroughs themselves. There is no way of attributing this tonnage to specific WPAs. In addition, 235,000 tonnes of waste received (38% of the total) was received by transfer stations, rather than final destination waste treatment facilities.

Similarly, 238,000 tonnes of CD&E waste has been exported from the SLWP area to other WPAs. However, again although the figure for imports is higher at 393,000 tonnes, only 91,000 tonnes were attributable to specific WPAs, and the remaining origins are unknown. And 71% of the waste imported (278,300 tonnes) was received by transfer stations, rather than final destination waste treatment facilities.

For hazardous waste, as the data source is different, there is less uncertainty with regards to origins. In this case, SLWP area exported 20,200 tonnes in 2017, with 20% of this going to Kent. South London received 800 tonnes in 2017, and so is a net exporter of hazardous waste.

## Sites & Areas

An assessment has been completed for each existing waste site in South London. These site profiles can be found in Appendix 4.

Opportunities to increase capacity on existing waste sites were identified in order to meet the capacity gaps. These include intensifying the throughput of existing operations and identifying vacant sites which could be redeveloped for waste uses. In addition, waste facilities in the planning pipeline were identified which, if given planning permission, would also contribute towards the shortfall in waste management capacity.

## Comparison of the capacity gaps and potential new capacity

Table 7 compares the capacity gaps with the potential new capacity identified, and calculates the balance of capacity.

Table 7: Summary of waste capacity gaps in South London 2021-2036 (tonnes and hectares)

Waste stream		2021	2026	2031	2036
LACW / C&I	Capacity gap	116,756	153,080	167,330	181,580
	Potential new capacity	270,000	270,000	270,000	270,000
	Balance	+153,244	+116,920	+102,670	+88,420
C&D	Capacity gap	148,381	153,105	162,197	168,262
	Potential new capacity	218,000*	218,000*	218,000*	218,000*
	Balance	<b>+69,619</b>	<b>+64,895</b>	<b>+55,803</b>	<b>+49,738</b>

Source: Anthesis

This shows that the sites identified for intensification and development represent sufficient opportunity to meet the capacity gaps for LACW, C&I and C&D waste streams. If all potential new capacity identified in was brought forward there would be a capacity surplus for LACW, C&I and C&D waste streams which decreases over the plan period but still remains as a surplus. This means there is some flexibility in bringing this capacity forward.

The analysis therefore found there are sufficient opportunities to meet the capacity gaps for LACW, C&I (apportioned waste) and C&D waste streams in South London. As sufficient opportunities can be identified to meet South London's capacity gap, it is not necessary to identify any areas for new waste facilities.

## Conclusions & Recommendations

The recommended strategy for each of the main waste streams is as follows:

### *LACW and C&I (apportioned waste)*

- Continue to safeguard existing waste sites including the safeguarding of waste sites not currently identified on borough policies maps.
- Engage with the operators of sites which have the potential to intensify their operations, namely 777 Recycling in Sutton and Veolia for Factory Lane Waste Transfer Station in Croydon.
- Identify vacant sites suitable for new waste facilities, namely 156 Beddington Lane (subject to discussions with 777 Recycling), vacant SafetyKleen site and Therapia Lane.
- Carry out engagement under the duty to co-operate with waste planning authorities (WPAs) who receive significant amount of LACW and C&I waste exports from South London.

### *CD&E waste*

- Continue to safeguard existing waste sites including the safeguarding of waste sites not currently identified on borough policies maps.
- Engage with the operators of sites which have the potential to intensify their operations, namely 777 Recycling in Sutton and UK and European Construction / Ranns Construction in Merton.
- Identify vacant sites suitable for new waste facilities, namely 156 Beddington Lane (subject to discussions with 777 Recycling), vacant SafetyKleen site and Therapia Lane.
- Carry out engagement under the duty to co-operate with waste planning authorities (WPAs) who receive significant amount of CD&E waste exports from South London.

### *Hazardous waste*

- Co-operate with the London Waste Planning Forum and the wider south east on hazardous waste management and planning for new facilities.
- Carry out engagement under the duty to co-operate with waste planning authorities (WPAs) who receive significant amount of hazardous waste exports from South London.



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## Abbreviations

Acronym	Definition
ABP	Animal By-Products
AD	Anaerobic Digestion
C&I	Commercial and Industrial Waste
C&D	Construction and Demolition Waste
CD&E	Construction, Demolition and Excavation Waste
Defra	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EIA	Environmental Impact Assessment
EWC	European Waste Code
HIC	Household, industrial and commercial wastes
HWDI	Hazardous Waste Data Interrogator
ILW	Intermediate Level Radioactive Waste
IVC	In-Vessel Composting
IWMF	Integrated Waste Management Facility
Ktpa	Thousands of tonnes Per Annum
LACW	Local Authority Collected Waste
LDF	Local Development Framework
LLW	Low Level Radioactive Waste
MBT	Mechanical Biological Treatment

Acronym	Definition
MHT	Mechanical Heat Treatment
MRF	Materials Recycling Facility
MSW	Municipal Solid Waste
SOC	Substance Oriented Classification
tDS	Total dissolved solids (in water)
Tpa	Tonnes Per Annum
VLLW	Very Low Level Radioactive Waste
WDI	Waste Data Interrogator
WEEE	Waste Electrical and Electronic Equipment
WPA	Waste Planning Authority

## Glossary

Term	Definition
Agricultural Waste	Waste from a farm or market garden, consisting of matter such as manure, slurry and crop residues.
Anaerobic Digestion	Organic matter broken down by bacteria in the absence of air, producing a gas (methane) and liquid (digestate). The by-products can be useful, for example biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used on farms as a fertiliser
Circular Economy	Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources and designing waste out of the system. Underpinned

Term	Definition
	by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: Design out waste and pollution; Keep products and materials in use; Regenerate natural systems (Ellen MacArthur Foundation)
Commercial Waste	Controlled waste arising from trade premises.
Construction, Demolition & Excavation Waste	Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures.
DEFRA – Department for Environment, Food and Rural Affairs	Defra is a UK Government department. Its mission is to enable everyone to live within our environmental means. This is most clearly exemplified by the need to tackle climate change internationally, through domestic action to reduce greenhouse gas emissions, and to secure a healthy and diverse natural environment.
Energy from Waste	The conversion of waste into a useable form of energy, often heat or electricity.
Environment Agency	A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice.
Exemption	A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within.
Hazardous Landfill	Sites where hazardous waste is landfilled. This can be a dedicated site or a single cell within a non-hazardous landfill, which has been specifically designed and designated for depositing hazardous waste.



Term	Definition
Hazardous Treatment	Sites where hazardous waste is treated so that it can be landfilled.
Hazardous Waste	Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste.
HIC	Household, Industrial and Commercial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HIC is used to describe the throughput where a facility manages both waste streams.
Household Waste	Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders themselves take to household waste recovery centres and "bring sites".
Incineration	The controlled burning of waste. Energy may also be recovered in the form of heat (see Energy from Waste).
Industrial Waste	Waste from a factory or industrial process.
Inert waste	Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater.
Inert Landfill	A landfill site that is licensed to accept inert waste for disposal.
In-Vessel Composting	A system that ensures composting takes place in an enclosed but aerobic (in the presence of oxygen) environment, with accurate temperature control and monitoring. There are many different systems, but they can be broadly categorised into six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls.

Term	Definition
ILW - Intermediate level radioactive waste	Radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities.
Local Authority Collected Waste (LACW)	Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste, beach cleansing waste and waste resulting from the clearance of fly-tipped materials.
Landfill	The permanent disposal of waste into the ground, by the filling of man-made voids or similar features.
Landfill Directive	European Union requirements on landfill to ensure high standards for disposal and to stimulate waste minimisation.
LLW – low level radioactive waste	Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment.
Materials Recycling Facility (MRF)	A facility for sorting and packing recyclable waste.
Mechanical Biological Treatment (MBT)	The treatment of residual waste using a combination of mechanical separation and biological treatment.
Non- Hazardous Landfill	A landfill which is licensed to accept non-inert (biodegradable) wastes e.g. municipal and commercial and industrial waste and other non-hazardous wastes (including inert) that meet the relevant waste acceptance criteria.
Non- Inert	Waste that is potentially biodegradable or may undergo significant physical, chemical or biological change once landfilled.
Organic Waste	Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass

Term	Definition
	or flower cuttings and hedge trimmings, as well as domestic and commercial food waste.
Open Windrow Composting	A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue.
Proximity Principle	Requires that waste should be managed as near as possible to its place of production, reducing travel impacts.
Recovery	Value can be recovered from waste by recovering materials through recycling, composting or recovery of energy.
Recycled Aggregates	Aggregates produced from recycled construction waste such as crushed concrete and planings from tarmac roads.
Recyclate	Raw material sent to, and processed in, a waste recycling plant or materials recovery facility (e.g. plastics, metals, glass, paper/card).
Recycling	The reprocessing of waste either into the same product or a different one.
Residual Waste	Waste remaining after materials for re-use, recycling and composting have been removed.
Waste Electrical and Electronic Equipment (WEEE)	Sites for the depollution, disassembly, shredding, recovery or preparation for disposal, and any other operation carried out for the recovery or disposal of Waste Electrical and Electronic Equipment.
Waste Hierarchy	A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal.

Term	Definition
Waste Local Plan	A statutory development plan prepared (or saved by the waste planning authority, under transitional arrangements), setting out policies in relation to waste management and related developments.
Waste Minimisation / Reduction	The most desirable way of managing waste, by avoiding the production of waste in the first place.
Waste Planning Authority (WPA)	The local authority responsible for waste development planning and control. They are unitary authorities, including London Boroughs and the City of London, National Park Authorities, and county councils in two-tier areas.
Waste Regulation Authority	The Environment Agency has responsibility for authorising waste management licenses for disposal facilities, and for monitoring sites.
Waste Transfer Station	A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal.

Source: Planning Portal, SEPA, Anthesis

## 1 Introduction

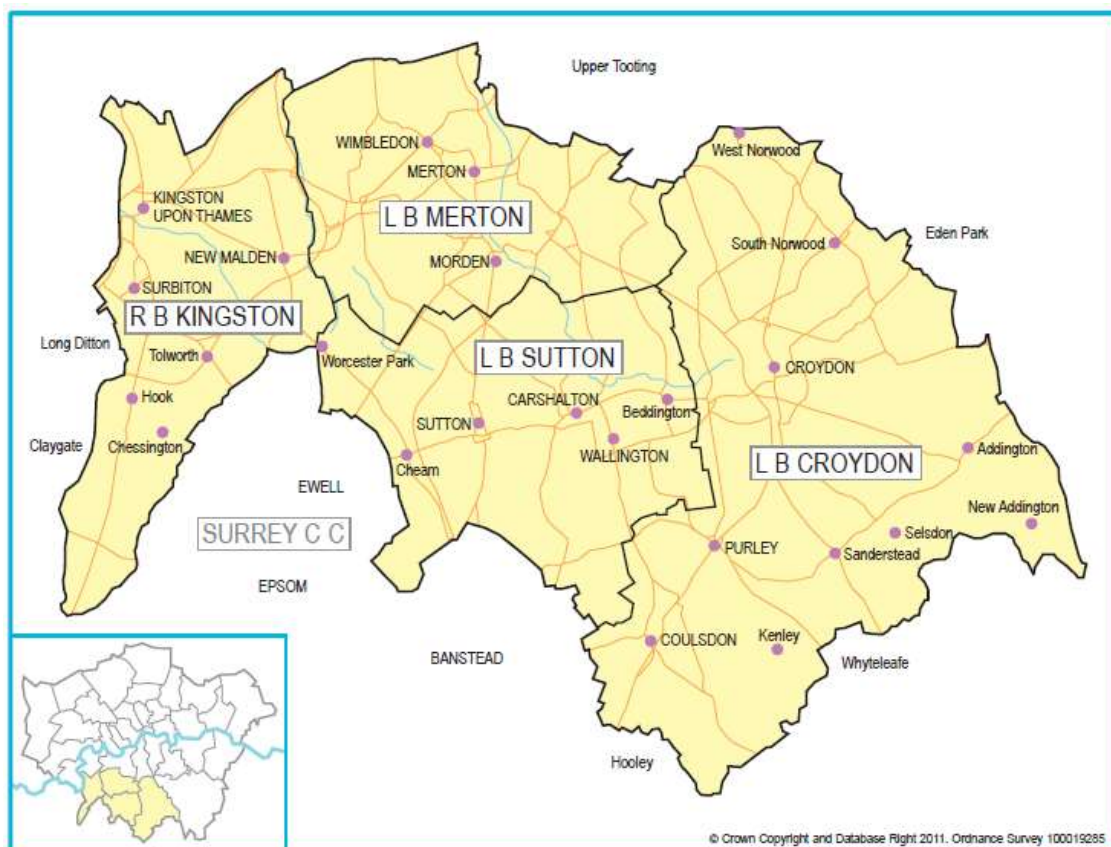
### 1.1 Background

1.1.1.1 The London boroughs of Croydon, Kingston, Merton and Sutton adopted the South London Waste Plan (SLWP) in March 2012, covering the period 2011 to 2021. The four partner boroughs have carried out this updated review to support delivery of a replacement SLWP which is anticipated to be adopted by 2021-22. It will cover the geographical areas (see Figure 1) of four partner boroughs of:

- London Borough of Croydon;
- London Borough of Merton;
- London Borough of Sutton; and
- Royal Borough of Kingston Upon Thames.

1.1.1.2 It will cover the time period 2021 – 2036.

Figure 1: Map of the South London Waste Plan area



- 1.1.1.3 The new SLWP will provide for the essential infrastructure to support housing growth in south London by:
- safeguarding existing waste treatment sites;
  - identifying sites and areas suitable for new waste facilities;
  - including planning policies that ensure that waste arisings in the boroughs are managed within the SLWP area and that new or redeveloped waste treatment facilities have the least impact on nearby uses and the environment.
- 1.1.1.4 The purpose of this study is to provide an up to date evidence base, upon which the South London Waste Plan can be prepared. This study analyses the need and existing waste capacity across the plan area and provides a borough-by- borough waste site search. This study includes a comprehensive analysis of:
- Legislation and policy relevant to waste planning;
  - Current and future waste arisings in the SWLP area that contribute towards the London Plan apportionment target;
  - Waste capacity across the SLWP area, including site specific analysis of existing waste sites and assessment of any potential future waste sites; and
  - Other waste streams that do not contribute towards London Plan apportionment targets.

## 1.2 Requirements

- 1.2.1.1 The National Planning Policy for Waste (2014) requires all Local Planning Authorities to identify sufficient opportunities to meet the identified needs of their area for the management of seven waste streams. They have a statutory duty to prepare a waste local plan in line with Article 28 of the Waste Framework Directive (2008), aiming to drive waste management up the waste hierarchy (see paragraph 2.3.4.2).
- 1.2.1.2 The South London Waste Plan (SLWP) (2012) provides the planning framework for waste in South London. The SLWP period is coming to an end and it is now time to review the plan in light of new national, regional and local policies. A new SLWP must be underpinned by a robust and proportionate evidence base document which includes an assessment of existing capacity, waste management need, and suitable sites and areas to meet this need.
- 1.2.1.3 This waste plan evidence base sets out the key information and data on waste issues in South London, provides analysis and makes recommendations on the most appropriate options for the South London Boroughs to take forward in a draft South London Waste Plan.

### 1.3 Scope of this work

This study includes the following outputs:

#### 1.3.1 Policy context

1.3.1.1 A review of all legislation and policy relevant to waste planning in England and to the preparation of a waste development plan document (DPD) and its evidence base:

- Background;
- Review of relevant legislation;
- National policy context;
- Regional policy context; and
- Local policy context.

#### 1.3.2 Waste Arisings and Forecasts for Apportioned Waste

1.3.2.1 This section provides waste arisings and forecasts, related to waste types covered by the draft London Plan apportionment (i.e. household / local authority collected waste (LACW) and commercial and industrial (C&I) wastes), and presents information by individual borough as well as totals for the SLWP area. It includes:

- An introduction to waste arisings and forecasts;
- Assessment of LACW/household waste arisings and forecasts to 2036; and
- Assessment of C&I waste arisings and forecasts to 2036.

#### 1.3.3 Arisings and Forecasts of Other Waste Types

1.3.3.1 This section reviews other waste streams that do not contribute towards the London Plan apportionment targets, but that are required to be planned for by planning authorities. For each waste type listed below, current waste estimates and future arisings, are presented.

- Construction, Demolition and Excavation waste (CD&E);
- Low Level Radioactive waste;
- Agricultural waste;
- Hazardous waste; and
- Wastewater.

#### 1.3.4 Waste Capacity Assessment for Apportioned Waste

1.3.4.1 This includes an assessment of current and future waste management capacity of waste sites/facilities in each of the partner boroughs, as well as the SLWP area as a whole. It includes:

- Apportionment criteria: what counts as waste management and towards the apportionment targets;

- Existing capacity: permitted and exempt waste sites in each borough and collectively;
- Capacity gap: between apportionment targets and arisings of other waste types, compared to the management capacity in each borough and collectively;
- Likely land requirement to meet any shortfall by borough and collectively; and
- Conclusions.

### **1.3.5 Sites and Areas**

1.3.5.1 This section identifies potential sites and areas which could help meet the capacity gaps, through either the intensification of existing operations, or through delivery of new sites.

### **1.3.6 Imports and Exports**

1.3.6.1 This section presents an assessment of waste imports and exports to and from the SLWP area.

### **1.3.7 Conclusions and Recommendations**

1.3.7.1 This section draws together the key conclusions from the report and makes recommendations for the SLWP boroughs to consider in their new SLWP DPD.



## 2 Policy Context

- 2.1.1.1 The waste plan evidence base for South London, and subsequent policies in the South London Waste Plan, will need to comply with EU, national, regional and local policies as follows:

### 2.1 Revised European Waste Framework Directive 2008 and Review of Waste Policy

- 2.1.1.1 Much of the impetus for meeting waste targets, such as increasing recycling and diversion of waste from landfill, comes from European Union legislation. The Government's Brexit White Paper (February 2017) confirmed that the current framework of environmental regulation set out in EU Directives will be transposed into UK law. This provides a degree of certainty in terms of policy direction for the immediate future, although monitoring will be essential after leaving the EU.
- 2.1.1.2 Article 28 of the Waste Framework Directive 2008 sets out the requirement for each Member State to produce a Waste Management Plan. This plan must set out an analysis of the current waste management situation and sufficient information on the locational criteria for site identification and on the capacity of future disposal or major recovery installations. These locational criteria are deferred to the Local Plans or Waste Plans of local authorities in the UK. The South London Waste Plan will form part of the UK's Waste Management Plan and will need to contain locational criteria in order to meet the requirements of the Directive. The Government's Resources and Waste Strategy (see below) commits to reviewing the Waste Management Plan for England in 2019.
- 2.1.1.3 A published "Review of Waste Policy and Legislation" by the EU in December 2015, has introduced a range of higher targets for recycling and the phasing out of landfilling organic and recyclable materials. This review means that facilities for the management of waste in accordance with these new targets will be required and should be planned for as part of a Local Plan or waste plan. The London Environment Strategy has similar targets, such as recycling 65% of municipal waste by 2030, and these have been incorporated into the draft new London Plan.

### 2.2 Localism Act 2011 and the Duty to Co-operate

- 2.2.1.1 The Localism Act 2011 gave the responsibility for strategic planning back to local authorities acting individually and signalled the end of planning at a regional level and with it, the requirement to produce a Regional Spatial Strategy. Section 110 of the Localism Act prescribes the "Duty to Co-operate" between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is "to engage constructively, actively and on an on-going basis" and must

“maximise the effectiveness” of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on where waste management facilities will be built.

- 2.2.1.2 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. This waste plan evidence base includes data on information on imports and exports of waste from South London to assist the boroughs with duty to co-operate engagement.

## **2.3 National Policy**

### **2.3.1 Resources and Waste Strategy**

- 2.3.1.1 The Government’s “Resources and Waste Strategy for England<sup>5</sup>” was published in December 2018, building on the recent “A Green Future: Our 25 Year Plan to Improve the Environment<sup>6</sup>” (January 2018). The overall strategy is to reduce the amount of waste produced, promote resource efficiency and move towards a circular economy.
- 2.3.1.2 The Resources and Waste Strategy commits to reviewing the Waste Management Plan for England, National Planning Policy for Waste and the accompanying Planning Practice Guidance in 2019 to align national policies with the Resources and Waste Strategy. The timetable for this review is not yet known but is likely to influence the development of a new South London Waste Plan.
- 2.3.1.3 There are a number of policy areas that could affect the amount and type of waste that local authorities have to plan for. For example, producers will pay for the disposal of their own packaging, there will be a tax on plastic packaging which does not include 30% recycled content, deposit return schemes and streamlined recycling and food waste collection services for households and businesses, and greater efficiency of energy recovery facilities.
- 2.3.1.4 The Resources and Waste Strategy acknowledges the deficiency in data on waste and commits to develop a new approach to collecting waste data, including a move away from weight-based targets towards impact-

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<sup>5</sup> <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

<sup>6</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

based targets. The timetable for this review is not yet known but could influence the development of a new South London Waste Plan.

- 2.3.1.5 The strategy is a 25year plan and it remains to be seen how it will impact on how waste planning authorities plan for waste. The outcomes will need to be monitored and any changes to waste production and management reflected in a future update of the South London Waste Plan.

### **2.3.2 Waste Management Plan for England**

- 2.3.2.1 The Waste Management Plan for England (2013) reflects the requirements of article 28 of the Revised European Waste Framework Directive (rWFD). It sets out how much waste is generated in England and how that waste is managed. It also includes an assessment of waste infrastructure needs in the future and measures to meet the obligations of the rWFD. It states that waste planning authorities are responsible for producing waste plans to support the objectives of the Waste Management Plan for England. The Resources and Waste Strategy commits to reviewing the Waste Management Plan for England in 2019.

### **2.3.3 National Planning Policy Framework**

- 2.3.3.1 A revised National Planning Policy Framework (NPPF) was published in February 2019. Changes to the plan-making section of the Planning Practice Guidance (PPG) were published in September 2018.
- 2.3.3.2 National planning policy for waste is dealt with separately, but the NPPF sets out policies for plan-making which will influence the development of the new South London Waste Plan. Paragraph 31 states that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence” which should be “adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” Paragraph 35 sets out the criteria against which Local Plans will be examined. These include:
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been

dealt with rather than deferred, as evidenced by the statement of common ground; and

- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

- 2.3.3.3 This waste evidence base focuses on meeting these requirements, including identifying South London’s objectively assessed waste management needs (positively prepared), identifying an appropriate strategy for South London’s waste (justified), identifying strategic waste exports from South London (effective) and ensuring conformity with waste policies (consistent with national policy).
- 2.3.3.4 The main differences affecting waste in the revised NPPF and PPG is the requirement for planning authorities to produce statements of common ground to provide evidence of progress made through the duty to co-operate. Waste is a cross-border strategic issue that will need to be addressed in statements of common ground with relevant waste planning authorities. When assessing if the Local Plan is sound, the Inspector will look to statements of common ground (SCG) for evidence that cross boundary strategic matters have been “dealt with rather than deferred” (NPPF 35) and that the South London Boroughs have complied with the duty to co-operate (DtC).

#### **2.3.4 National Planning Policy for Waste and National Planning Practice Guidance: Waste**

- 2.3.4.1 The “National Planning Policy for Waste”<sup>7</sup> (NPPW), published in 2015, sets out the Government's waste planning policies which all local planning authorities must have regard to when developing local waste plans. The NPPW is supplemented by the “Planning Practice Guidance”<sup>8</sup> section on waste which provides further detail on how to implement the policies.
- 2.3.4.2 The NPPW requires planning authorities to prepare Local Plans which drive waste management up the waste hierarchy (see Figure 2).

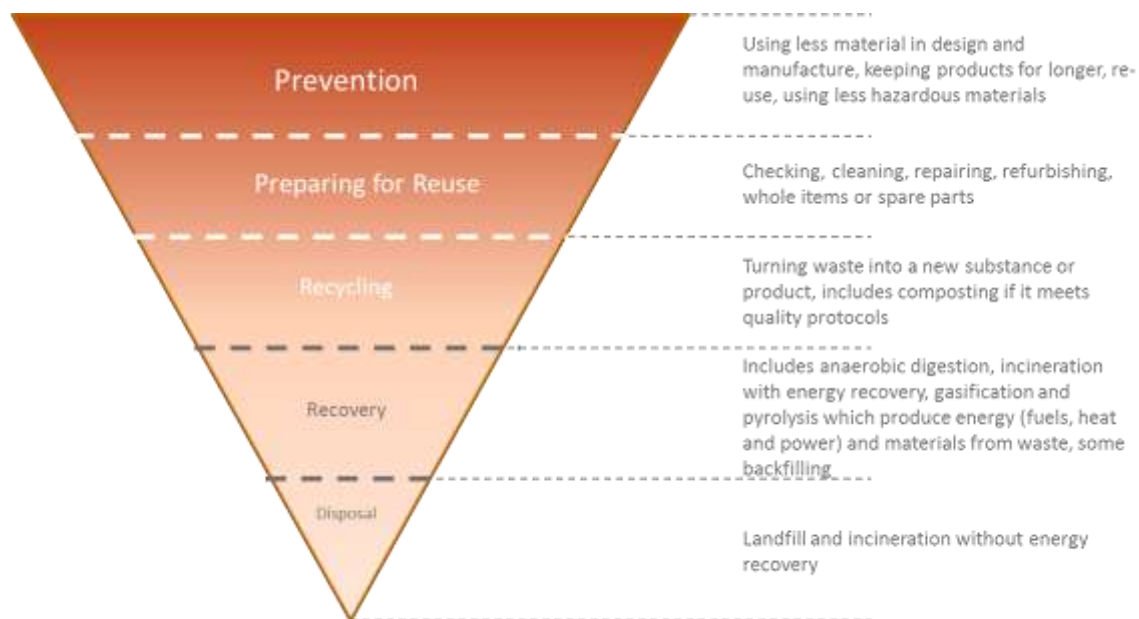
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<sup>7</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

<sup>8</sup> <https://www.gov.uk/guidance/waste>

Figure 2: The Waste Hierarchy



Source: Anthesis

2.3.4.3 Importantly for this waste plan evidence base, the NPPW sets out policies on data and analysis to underpin a proportionate evidence base, establishing the need for waste management facilities, and identifying suitable sites and areas to meet the need in local plans.

2.3.4.4 The NPPW states that waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

2.3.4.5 The NPPW requires that the waste evidence base for Local Plans should include:

- existing waste management capacity;
- waste arisings from within the planning authority area, including imports and exports;
- waste management capacity gaps in total and by particular waste streams;
- forecasts of waste arisings throughout the plan period; and
- waste management capacity required to deal with forecast arisings throughout the plan period.

2.3.4.6 This waste plan evidence base includes all these elements.

2.3.4.7 The NPPW requires information on existing waste management facilities to include:

- site location details – name of site and operator, address, postcode, local authority, grid reference etc.;
- type of facility – what process or processes are occurring on the site and which waste streams they manage;
- licence/permit details – reference number, tonnage restrictions, waste type restrictions, dates of renewal, etc and status if not yet licensed and permitted;
- capacity information – licensed and permitted throughput by waste type;
- site lifetime or maximum capacity – it is important to record the expected lifetime of facilities and, where appropriate, their total remaining capacity;
- waste sources – origin of wastes managed, broken down by type and location;
- outputs from facility – recovery of material and energy, production and export of residues and the destination of these, where appropriate; and
- additional information – potential of site for increasing throughput, adding further capacity, other waste management uses, etc.

2.3.4.8 The site profiles and capacity information provided in this study includes this information.

2.3.4.9 The NPPW/G requires waste planning authorities to plan for seven waste streams. These waste streams are:

- Municipal/household;
- Commercial/industrial;
- Construction, Demolition & Excavation;
- Low Level Radioactive;
- Agricultural;
- Hazardous; and
- Wastewater.

2.3.4.10 Section 5 of this report sets out existing capacity and identifies capacity gaps for all these waste streams.

2.3.4.11 The NPPW requires Local Plans to identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. The London Plan requires boroughs to provide capacity through facilitating the maximum use of existing facilities. Both the NPPW and London Plan direct new waste facilities towards industrial locations. Paragraph 4 of the NPPW under Identifying Suitable Sites and Areas makes clear that Local Plans can identify suitable

areas as well as sites for new or enhanced waste management facilities. Waste planning authorities should also identify the broad type or types of waste management facility that would be appropriately located on the allocated site or area in line with the waste hierarchy and seek opportunities to co-locate waste management facilities together with complementary activities.

2.3.4.12 The opportunities to meet the identified waste management need, including locations for new facilities, and appropriate types of facilities, is set out in the Sites and Areas chapter of this report.

2.3.4.13 The Resources and Waste Strategy commits to reviewing the NPPW and associated sections of the PPG in 2019.

### **2.3.5 National Planning Policy Statements**

2.3.5.1 National Planning Policy Statements (NPS) comprise the Government's objectives for the development of nationally significant infrastructure in a particular sector and include any other policies or circumstances that ministers consider should be taken into account in decisions on infrastructure development. There are three relevant NPSs for waste: NPS for Renewable Energy (2011), NPS for Hazardous Waste (2013) and NPS for Waste Water (2012). There are no known plans to deliver a nationally significant facility for hazardous waste or waste water in South London.

## **2.4 Regional Context**

### **2.4.1 London Environment Strategy**

2.4.1.1 The Mayor's London Environment Strategy (May 2018) updates targets for waste and recycling. These updated targets will be taken forward in a new London Plan, due for publication in 2020. The Mayor's strategy for waste includes the following targets:

- No biodegradable or recyclable waste to landfill by 2026;
- 65% of 'municipal' (household and business) waste recycled by 2030, comprising:
  - 50% LACW recycled by 2025; and
  - 75% business recycled by 2030.

### **2.4.2 London Plan (March 2016)**

2.4.2.1 The National Planning Practice Guidance (NPPG) on Waste states that "WPAs should have regard to the apportionments set out in the London Plan when developing their policies. The SLWP will need to be in general conformity with the London Plan".

- 2.4.2.2 Many of the waste targets in the current London Plan have been superseded by the London Environment Strategy. For example, recycling targets for LACW and C&I waste have been pushed back from 2020 to 2025 and 2030 respectively.
- 2.4.2.3 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan. Land to manage borough waste apportionments should be brought forward through protecting and facilitating the maximum use of existing waste sites.
- 2.4.2.4 The apportionment target for the South London boroughs by 2021 is 669,000 tpa.

*Table 8: Current London Plan (2016) apportionment targets for South London (tonnes per annum)*

Borough	Apportionment 2021	Apportionment 2036
Croydon	199,000	247,000
Kingston	119,000	148,000
Merton	192,000	239,000
Sutton	159,000	198,000
<b>Total</b>	<b>669,000</b>	<b>832,000</b>

Source: GLA, Draft London Plan, 2018

- 2.4.2.5 The London Plan encourages boroughs to collaborate by pooling their apportionment requirements.

### **2.4.3 Draft London Plan (December 2017) with minor suggested changes (July 2018) and further suggested changes (March 2019)**

- 2.4.3.1 At the time of writing, a new London Plan is being prepared with anticipated adoption in 2020. A draft London Plan was published for consultation in December 2017 and in response to comments received minor suggested changes were published in July 2018. Further suggested changes were published online ahead of the public hearing in April 2019. The timetable for preparing the new South London Waste Plan means it is most likely to be examined against policies in the new London Plan. This section therefore focuses on any potential changes to existing London Plan policies (incorporating the minor and further suggested



changes), while acknowledging they will still be subject to an examination in public before adoption.

2.4.3.2 The draft London Plan includes revised targets for waste which reflect and build on those set out in the London Environment Strategy. These include:

- the equivalent of 100% of London's waste managed within London (i.e. net self-sufficiency) by 2026 (for all waste streams except excavation waste); and
- zero biodegradable or recyclable waste to landfill by 2026;
- At least 65% recycling of municipal waste by 2030;
- 95% reuse/recycling/recovery of construction and demolition waste;
- 95% beneficial use of excavation waste.

2.4.3.3 The draft London Plan includes new apportionment targets for each borough in order to meet the net self-sufficiency target for LACW and C&I waste. The combined apportionment targets for South London are higher than those in the current London Plan. This waste plan evidence base plans on the basis of the draft apportionment targets.

*Table 9: Draft New London Plan (2017) apportionment targets for South London (tonnes per annum)*

Borough	Apportionment 2021	Apportionment 2041
Croydon	252,000	268,000
Kingston	187,000	199,000
Merton	238,000	253,000
Sutton	210,000	224,000
<b>Total</b>	<b>887,000</b>	<b>944,000</b>

Source: GLA, Draft London Plan, 2018

2.4.3.4 The draft new London Plan waste policies have been updated to align with the NPPW approach to identifying sites and/or areas to meet identified waste management need.

2.4.3.5 The definition of managed waste has been extended to include the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum. This increases the amount of existing capacity which counts towards managing apportioned waste.

- 2.4.3.6 The further suggested changes to the London Plan make clear that boroughs are expected to identify suitable additional capacity for those waste streams not apportioned by the London Plan, where practicable.
- 2.4.3.7 At the time of writing, the waste section of the draft new London Plan has yet to be subject to public hearings.

#### **2.4.4 Mayor's Supplementary Planning Guidance**

- 2.4.4.1 The "Mayor's Sustainable Design and Construction SPG"<sup>9</sup> (April 2014) was produced by the previous Mayor and provides developers with best practice guidance on circular economy principles during the construction and demolition phase to reduce waste, increase recovery from demolition materials, maximise pre-fabricated elements, and ensure sufficient space for storing recyclables and residual waste ready for collection. This document is likely to be superseded on adoption of the new London Plan and the Circular Economy Statement guidance.
- 2.4.4.2 The "Mayor's Land for Industry and Transport SPD"<sup>10</sup> (Sept 2012) was produced by the previous Mayor and provides further guidance for boroughs on implementing London Plan policies, with particular emphasis on a proactive approach to accommodating new waste facilities. The guidance repeats approaches identified elsewhere in policy and focuses on delivering apportionment targets in the current London Plan, so is likely to be superseded on adoption of the new London Plan.
- 2.4.4.3 The "Mayor's Municipal Waste Management Strategy"<sup>11</sup> (Nov 2011) was produced by the previous Mayor and has largely been replaced by the London Environment Strategy (2018).

## **2.5 Local Policies**

### **2.5.1 South London Waste Plan (March 2012)**

- 2.5.1.1 The South London Waste Plan (SLWP) (March 2012) sets out the long-term vision, spatial strategy and policies for the sustainable management of waste until 2022. It identifies 27 existing permitted facilities, 11

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<sup>9</sup>

[https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf)

<sup>10</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/land-industry-and>

<sup>11</sup> <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/mayors-municipal-waste-management-strategy>

industrial areas suitable for new waste facilities and sets out policies for determining planning applications relating to waste facilities. The SLWP forms part of the Development Plan for each of the partner boroughs.

- 2.5.1.2 The SLWP plan period is coming to an end and the preparation of a new waste plan is required. Since the SLWP was adopted in 2012 many of the policy documents have been updated and there are new targets to plan for.

## **2.5.2 South London Waste Partnership Joint Municipal Waste Strategy (2011)**

- 2.5.2.1 The South London Waste Partnership is the disposal authority for household waste collected by the South London Boroughs. The Partnership's Joint Municipal Waste Strategy (2011) is a statement of intent to guide the authorities in undertaking their individual waste management activities. It covers the period from 2010 to 2020. It includes a strategic goal, objectives and a number of measurable targets.

## **2.5.3 London Borough of Croydon**

- 2.5.3.1 Croydon's Local Plan (February 2018) Policy SP6: Environment and Climate Change points to the South London Waste Plan as the delivery vehicle for planning for waste and commits Croydon to working with the London boroughs of Kingston-upon-Thames, Merton and Sutton to plan for waste across the South London area. Strategic Objective 9 seeks to ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change. Policy DM13: Refuse and Recycling requires developers to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design.

## **2.5.4 London Borough of Kingston**

- 2.5.4.1 Kingston's Core Strategy (April 2012) Policy CS9: Waste Reduction and Management sets out strategic priorities and targets for the borough and points to the South London Waste Plan as the delivery vehicle for this. The policy commits Kingston to working with the London boroughs of Croydon, Merton and Sutton to plan for waste across the South London area. Core Strategy Objective 4 is to promote sustainable waste management within the four-borough waste partnership by preparing a Joint Waste Plan to identify suitable waste management sites to meet needs identified in the London Plan and policies to ensure high standards of development and to safeguard existing sites.

## **2.5.5 London Borough of Merton**

- 2.5.5.1 Merton's Core Planning Strategy (July 2011) Policy CS17: Waste Management sets out strategic priorities and targets for the borough and

points to the South London Waste Plan as the delivery vehicle for this. The policy commits Merton to working with the London boroughs of Croydon, Kingston-upon-Thames and Sutton to plan for waste across the South London area. Strategic Policy 1 seeks to apply the waste hierarchy and exploit opportunities to utilise energy from waste.

- 2.5.5.2 Merton's Sites and Policies Plan (July 2014) notes that the South London Waste Plan allocates specific areas as being suitable for new waste facilities.
- 2.5.5.3 The emerging (Stage 2) Merton Local Plan (October 2018) includes a similar but updated strategic policy for waste as the Core Strategy (2011) which references the South London Waste Plan to deliver the strategy. The draft Environment chapter also contains waste policies. Strategic Objective 4 also takes forward the aim to apply the waste hierarchy and exploit opportunities to utilise energy from waste. Policy CC8.10: Supporting a more sustainable and resilient environment and CC8.15: Circular economic principles both include a commitment to support the principles of the circular economy.

## **2.5.6 London Borough of Sutton**

- 2.5.6.1 The Sutton Local Plan (February 2018) does not have a specific policy for waste, instead defers to the South London Waste Plan in the supporting text for Policy 14: Industrial Land.
- 2.5.6.2 Sutton Industrial Land Phase 1 Baseline Study (May 2016) (also known as the Strategic Industrial Locations Land Survey (2015)) assesses three strategic industrial areas which are identified in Schedule 2 of the SLWP as suitable for waste uses. These are Beddington, Kimpton and Imperial Way. Imperial Way (6ha) is in fact not identified in Schedule 2 of the SLWP. Wandle Valley Trading Estate is identified in Schedule 2 of the SLWP, however this area now forms part of a site allocation in Sutton's Local Plan. It has planning permission for residential development which is currently under construction. The permission also includes a re-provision of 1,152 square metres of floor space on the 'island' part of the site.
- 2.5.6.3 While Sutton's Local Plan describes the three SILs as having low vacancies, the Industrial Land Study consider vacancies on all of the SILs as representing a healthy level of frictional capacity to allow business movement and churn within the market place.

### **3 Apportionment Waste Arisings Estimates and Forecasts**

#### **3.1 Waste Arisings Background**

3.1.1.1 The first analytical stage of this study is to review the available data on waste arisings from a variety of public sources, and then use this data, along with factors which are likely to influence arisings in the future, to generate arisings estimates per waste type to 2036. Each waste type and the assumptions used to estimate future arisings are covered in the following report chapters. This chapter (3) reports estimates for the waste types currently covered by the GLA's London Plan waste apportionment. The following chapter (4) covers the other waste types required to be addressed set out in Paragraph 13 of the PPG.

#### **3.2 Introduction to Arisings and Forecasts**

- 3.2.1.1 The term 'municipal waste' has historically been used in waste policy to describe all waste which is managed by or on behalf of a local authority. However, the Landfill Directive defines municipal waste as waste from households as well as other waste that, because of its nature or composition, is similar to waste from households. This includes a significant amount of waste that is generated by businesses and which is not collected by local authorities.
- 3.2.1.2 For planning purposes, it is important to know how much waste in total requires management. Waste management departments within local authorities have established systems for measuring the quantities of waste that they manage and this is reported to Defra through the WasteDataFlow reporting system, which has been established since 2004. Due to this established reporting mechanism, robust data is held on waste collected by local authorities.
- 3.2.1.3 The remainder of waste arisings, whether similar to household waste or more homogeneous, is not measured through a systematic or robust system, but in periodic surveys that have been carried out to understand the quantities arising.
- 3.2.1.4 To ensure consistency with the terminology used by national Government, the term 'Local Authority Collected Waste' (LACW) will be used for the waste collected by the local authorities, and the remainder of the non-hazardous waste which is collected from business will be referred to as commercial & industrial (C&I) waste. This terminology originates from Defra's response to the consultation on meeting the EU Landfill Diversion Targets in England in 2010 and ensures that LACW data is consistent with data on LACW in previous work.

### 3.3 Local Authority Collected Waste (LACW)

3.3.1.1 LACW waste consists of waste which comes into the possession of, or under the control of, the local authority. The LACW collected by local authorities can include household waste (residual, dry mixed recycling and food waste), street sweepings, green waste from upkeep of open spaces, and a small quantity of clinical waste<sup>12</sup>. Depending upon the local arrangements, LACW can include material collected by trade waste operations. The data reported in this section relates to the household waste proportion of LACW arisings, to avoid double counting of the trade waste portion, which is reported in section 3.4.

3.3.1.2 Local authorities are required to make detailed returns to Defra of the quantity of waste arisings collected from municipal sources and how the materials are subsequently managed. The accuracy of this data is therefore high.

### 3.4 Commercial and Industrial Waste (C&I)

3.4.1.1 Commercial and industrial (C&I) waste is waste generated from the following activities:

- Industrial Sectors
  - Food, drink and tobacco manufacturing businesses
  - Textiles/wood/paper/publishing businesses
  - Power and utilities companies
  - Chemical/non-metallic minerals manufacturing businesses
  - Metal manufacturing businesses
  - Machinery & equipment (other manufacturing) businesses
- Commercial Sectors
  - Retail and wholesale
  - Hotels and catering
  - Public administration and social work
  - Education
  - Transport and storage
  - Other services

3.4.1.2 Data for C&I waste is not reported regularly and therefore are reliant on surveys undertaken at certain times. The last survey was undertaken in

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<sup>12</sup> Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).

England in 2009, however still provides the most up-to-date information with regards to how C&I waste is managed.

### 3.5 Current and Future Arisings

3.5.1.1 In the existing London Plan, apportionment figures were broken down into household and C&I wastes. However, the latest figures do not provide this breakdown, just a total. In order to calculate whether there is sufficient waste management infrastructure within the SLWP area, the apportionment figures have been used, rather than estimating actual arisings.

3.5.1.2 Tables 9.1 and 9.2 in the draft London Plan provide estimates of waste arisings and apportionment figures for 2021 and 2041, for each of the boroughs. Most of the boroughs within the SLWP area, have been set apportionment targets higher than their anticipated waste arisings, with the exception of Croydon, which has actually been set a lower target. Collectively the apportionment is higher than the anticipated arisings.

*Table 10: Household & C&I waste arisings and apportionment targets by borough (tonnes per annum)*

	2021		2041	
	Arisings	Apportionment	Arisings	Apportionment
Croydon	305,000	252,000	327,000	268,000
Kingston	152,000	187,000	161,000	199,000
Merton	173,000	238,000	184,000	253,000
Sutton	161,000	210,000	173,000	224,000
<b>Total</b>	<b>791,000</b>	<b>887,000</b>	<b>845,000</b>	<b>944,000</b>

Source: GLA, Draft London Plan, 2018

3.5.1.3 The apportionment targets for each authority have been used to calculate the targets for the intervening years i.e. between 2021 and 2041. The figures for 2016 have been taken from the existing London Plan. These are presented in Table 11.

Table 11: Apportioned waste by forecast year (tonnes per annum)

	2016	2021	2026	2031	2036
Croydon	273,000	252,000	256,000	260,000	264,000
Kingston	143,000	187,000	190,000	193,000	196,000
Merton	161,000	238,000	241,750	245,500	249,250
Sutton	155,000	210,000	213,500	217,000	220,500
<b>Total</b>	<b>732,000</b>	<b>887,000</b>	<b>901,250</b>	<b>915,500</b>	<b>929,750</b>

Source: GLA, Draft London Plan, 2018

## 4 Arisings and Forecasts of other waste types

### 4.1 Construction, Demolition and Excavation Waste (CD&E)

#### 4.1.1 What is this waste?

- 4.1.1.1 CD&E waste comprises of waste arising from the construction and demolition industries, including excavation during construction activities, and is made up of mainly inert materials such as soils, stone, concrete, brick and tile. However, there are also non-inert elements in this waste stream such as wood, metals, plastics, cardboard, and residual household-like wastes. Due to their weight, the inert elements make up the majority of the total tonnage.
- 4.1.1.2 As the reliability of CD&E waste data is low, apportionments for this waste stream are not set out in the London Plan. However, boroughs are still required to plan for this waste stream and identify suitable additional capacity for waste not apportioned by the London Plan, including C&D waste. Excavation waste is excluded from the London Plan net self-sufficiency target as it is difficult to recycle this waste stream and it will be difficult for London to provide sites for management or beneficial use.
- 4.1.1.3 The London Plan targets that London will recycle and re-use 95% of CD&E waste by 2020.

#### 4.1.2 Current and future arisings

- 4.1.2.1 Establishing the current waste arisings of CD&E waste is challenging due to the lack of robust data sources for this type of waste material.
- 4.1.2.2 The Environment Agency's Waste Data Interrogator collates data from waste returns from individual waste sites. There are some drawbacks to this data, including potential double counting of waste streams, and the



fact that it does not cover waste treated under exemptions, or at energy from waste facilities.

- 4.1.2.3 However, it is the best data available, and allows CD&E to be identified as it is coded under Chapter 17 (Construction and Demolition Waste) of the European Waste Catalogue (EWC). The origin borough is also reported, and therefore it has allowed arisings to be identified for each of the constituent authorities.
- 4.1.2.4 The overall waste arisings have been based on a baseline year of 2017 and forecast using GLA's employment figures in the construction sector until 2036. The methodology behind the GLA's employment projections is complex and available in detail on their website<sup>13</sup>.
- 4.1.2.5 In summary, these projections are presented disaggregated by sector and by borough. The sector projections are trend projections and estimate jobs in future years based on the historic productivity relationship between output and jobs, and assumed future output growth. Borough level projections combine trend projections and an assessment of employment site capacity of the individual boroughs.
- 4.1.2.6 The sector and borough projections have been combined to form a specific employment rate in the construction sector. A direct correlation between development and employment and waste arisings from construction has been assumed.
- 4.1.2.7 CD&E waste is highly influenced, particularly in London, by commercial and residential developments, including infrastructure, which means that peaks and troughs are often seen, and arisings do not necessarily follow a steady linear pattern.

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<sup>13</sup> <https://www.london.gov.uk/business-and-economy-publications/london-labour-market-projections-2017>

4.1.2.8 Table 12 and Figure 3 show both the current and forecasted CD&E waste arisings. Figures for 2017 are actuals taken from WDI, and this shows an increase from 508kt to 551kt by 2036.

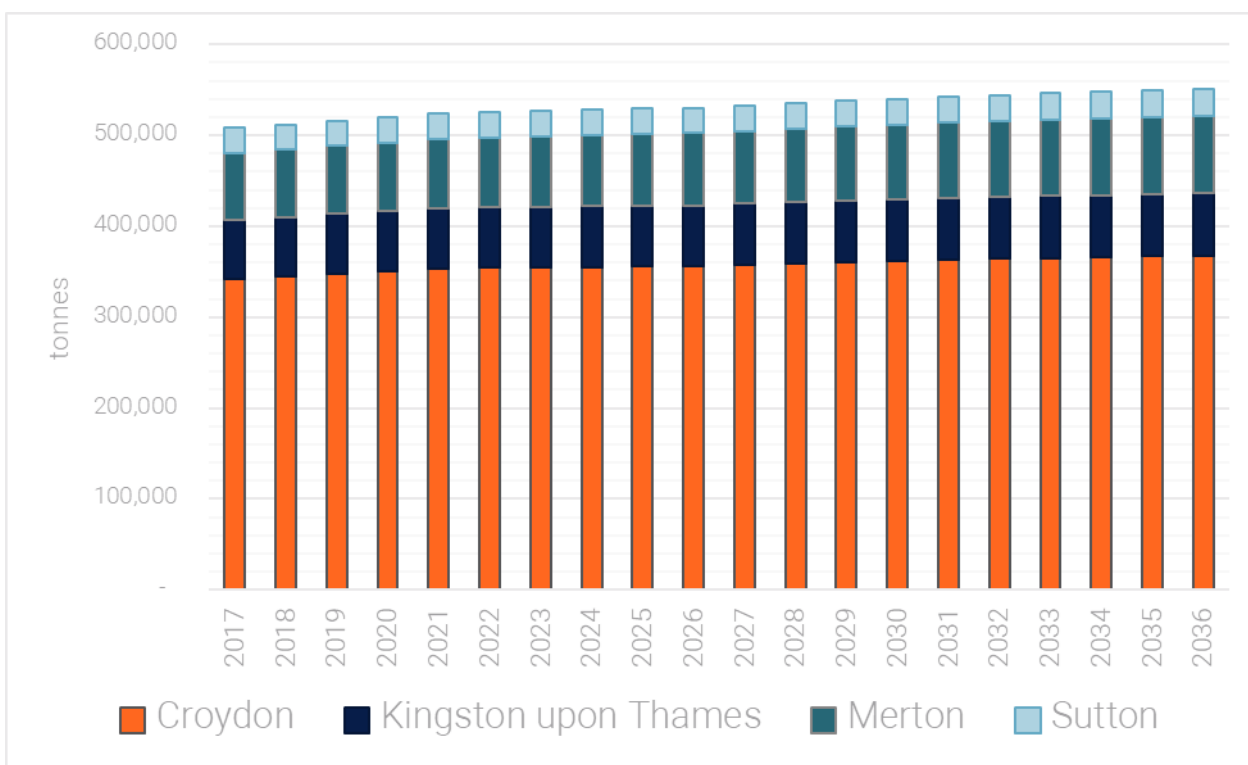
Table 12: Forecast CD&amp;E waste arisings for each borough and for SLWP area (tonnes per annum)

			2017	2021	2026	2031	2036
<b>Croydon</b>	C&D	Inert/C+D	282,613	292,593	294,629	300,542	304,303
		Hazardous	364	377	380	388	392
	Excavation	Inert/C+D	53,198	55,077	55,460	56,573	57,281
		Hazardous	5,458	5,651	5,690	5,804	5,877
	Total		341,634	353,698	356,158	363,307	367,853
<b>Kingston</b>	C&D	Inert/C+D	37,530	37,850	38,242	39,002	39,002
		Hazardous	36	37	37	38	38
	Excavation	Inert/C+D	28,037	28,276	28,569	29,137	29,137
		Hazardous	-	-	-	-	-
	Total		65,604	66,162	66,848	68,176	68,176
<b>Merton</b>	C&D	Inert/C+D	46,243	47,956	50,051	52,081	54,016
		Hazardous	19	19	20	21	22
	Excavation	Inert/C+D	27,047	28,048	29,274	30,461	31,593
		Hazardous	201	208	218	226	235
	Total		73,510	76,232	79,563	82,789	85,865
<b>Sutton</b>	C&D	Inert/C+D	15,478	15,638	15,834	16,214	16,576
		Hazardous	29	29	30	30	31
	Excavation	Inert/C+D	11,071	11,185	11,326	11,597	11,856
		Hazardous	576	582	589	603	617
	Total		27,154	27,434	27,778	28,445	29,080
<b>SLWP</b>	C&D	Inert/C+D	381,865	394,036	398,756	407,838	413,897
		Hazardous	448	463	467	477	483

			2017	2021	2026	2031	2036
	Excavation	Inert/C+D	119,353	122,586	124,628	127,768	129,867
		Hazardous	6,235	6,441	6,497	6,634	6,729
<b>Total</b>			<b>507,901</b>	<b>523,526</b>	<b>530,348</b>	<b>542,717</b>	<b>550,975</b>

Source: Anthesis

Figure 3: Actual and forecasted CD&E waste for SLWP area



## 4.2 Low Level Radioactive Waste

- 4.2.1.1 Radioactive waste is any material that is either radioactive itself or is contaminated by radioactivity and for which no further use is envisaged. Most radioactive waste is produced from nuclear power stations and the manufacture of fuel for these power stations. This is referred to as “nuclear waste.” Radioactive waste is not included in the definition of hazardous waste. No such waste is generated within the South London Waste Plan (SLWP) area
- 4.2.1.2 Radioactive waste also arises from nuclear research and development sites. Some also arises from Ministry of Defence sites and medical, industrial and educational establishments, such as hospitals and universities. This is sometimes referred to as “non-nuclear waste”.

4.2.1.3 This waste stream is divided into four categories as follows:

1) High Level Wastes (HLW): These are highly radioactive materials that generate substantial amounts of heat. HLW is the product from reprocessing spent nuclear fuel at Sellafield in Cumbria. It arises as highly radioactive nitric acid, which is converted into glass within stainless steel containers in a process called vitrification which is carried out at Sellafield. If declared a waste, spent fuel can also be categorised as HLW.

2) Intermediate Level Wastes (ILW): These are wastes with radioactivity levels that are higher than for Low Level Waste, but which do not require heating to be taken into account in the design of management facilities. ILW is sufficiently radioactive to require shielding and containment. It arises mainly from the reprocessing of spent fuel and from operations and maintenance at nuclear sites, including fuel casing and reactor components, moderator graphite from reactor cores, and sludges from the treatment of radioactive effluents.

3) Low Level Waste (LLW): These are radioactive wastes other than that suitable for disposal with ordinary refuse. Radiation levels do not exceed 4 gigabecquerels per tonne of alpha activity, or 12 gigabecquerels per tonne of beta or gamma activity. (A Becquerel is the unit of radioactivity, representing one disintegration per second.) Unlike HLW and ILW, LLW does not normally require shielding during handling or transport. LLW consists largely of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry. As nuclear plants are decommissioned, there will also be large volumes of this type of waste arising in the form of soils, concrete and steel. LLW represents about 90% by volume of UK radioactive wastes but contains less than 0.0003% of the radioactivity.

4) Very Low Level Waste (VLLW): This is a sub-category of LLW, consisting of the same sorts of materials, and divided into Low Volume ("dustbin loads") and High Volume ("bulk disposal"). Low volume VLLW can be disposed of to unspecified destinations with municipal, commercial or industrial waste. High volume VLLW can be disposed of to specified landfill sites and controlled as specified by the environmental regulators.

4.2.1.4 Categories 3 and 4 are those of interest in this study. There are no facilities within the SLWP area for the processing of such material.

4.2.1.5 Non-nuclear organisations carrying out a radioactive substances activity, need to apply to the Environment Agency for a Radioactive Substances permit, for:

- keeping or using radioactive material;
- receiving, accumulating or disposing of radioactive waste;
- keeping or using mobile radioactive apparatus.

According to the EA public register, there are 10 organisations holding 13 permits to keep and use radioactive materials in the constituent authorities of the SLWP, mainly hospitals, universities and private companies. The EA data does not identify which of these permits are currently active.

4.2.1.6 Any discharges from these permitted facilities to air, water (including discharges to sewer) and land are regulated and monitored under the Pollution Prevention and Control (PPC) regime. The latest data available for arisings of this type of waste is the Pollution Inventory Dataset from 2017. This dataset identified small permitted discharges to sewer from some of the permitted facilities within the SLWP area (which make up a small part of the wastewater volumes described in section 4.5), but no solid waste transfers, and therefore this waste places no requirement on SLWP to provide solid waste management infrastructure. Therefore, no forecasts are required or have been carried out on this type of waste.

### **4.3 Agricultural Waste**

4.3.1.1 Since 2006, most agricultural waste has been subject to the same controls that have applied to other sectors for many years (with the exception of natural wastes including slurries and manures used as fertiliser on agricultural premises).

4.3.1.2 In the 2006 waste management regulations agricultural waste was defined as waste from premises used for agriculture within the meaning of the Agriculture Act 1947, the Agriculture (Scotland) Act 1948 or the Agriculture Act (Northern Ireland) 1949, and the Chartered Institute of Wastes Management (CIWM) refer to it as waste that has been produced on a farm in the course of 'farming'.

4.3.1.3 Similarly to CD&E and hazardous waste, WDI has been used to estimate current agricultural waste arisings (i.e. EWC 02 01). However, perhaps due to the urban nature of the boroughs, only 383 tonnes of agricultural waste was reported in 2017 (generated in Kingston). Given the relatively small tonnage of this waste, it is not considered to need specific waste management consideration.

## 4.4 Hazardous Waste

- 4.4.1.1 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. They range from asbestos, chemicals, and oil through to electrical goods and certain types of healthcare waste. Quantifying the amount of hazardous waste is somewhat complicated, as not all hazardous waste is recorded in the same way. Hazardous waste requires a range of specialist facilities for treatment and disposal, and so often this waste may travel further than types of non-hazardous waste.
- 4.4.1.2 Estimates of hazardous waste were collated from the EA's Hazardous WDI (2017), as this source reports records from consignment notes and is considered to be the most accurate data source for this waste type. Therefore, the estimates (presented in Table 13) within this section are also included in the household, C&I and CD&E estimates and should not be added to the total as this will mean they are double counted.
- 4.4.1.3 Hazardous waste has therefore been forecast using the growth rates shown in the GLA's Draft London Plan C&I waste arisings figures. Currently 20.2ktpa of hazardous waste is being produced, which is less than 2% of the overall waste arisings. Table 13 shows that this is expected to rise to 21.6ktpa by 2036.

Table 13: Hazardous waste arisings in the South London area (tonnes per annum)

	<b>2017 (baseline)</b>	<b>2021</b>	<b>2026</b>	<b>2031</b>	<b>2036</b>
Croydon	8,514	9,008	9,008	9,008	9,193
Kingston	2,404	2,404	2,404	2,404	2,432
Merton	4,325	4,591	4,591	4,591	4,685
Sutton	4,936	5,239	5,239	5,239	5,303
<b>Total</b>	<b>20,180</b>	<b>21,242</b>	<b>21,242</b>	<b>21,242</b>	<b>21,612</b>

Source: Hazardous Waste Data Interrogator, 2017 (baseline)

## 4.5 Wastewater

- 4.5.1.1 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and manages sewerage infrastructure as well as sewage treatment works. Thames Water operates across London and the Thames Valley supplying water services to 9 million customers and wastewater services to 14 million. On average, each day the company

supplies 2.6 billion litres of drinking water and removes and treats more than 4 billion litres of sewage. For its wastewater services, total assets across London include 351 sewage treatment works, 100,000 km of sewer and 4,780 pumping stations<sup>14</sup>.

- 4.5.1.2 Table 14 shows the existing quantities of wastewater treated and volume of sludge produced, and projections for 2035. Wastewater quantities are expected to increase from 52.9 million m<sup>3</sup>/yr to 55.7 million m<sup>3</sup>/yr.

*Table 14: Wastewater quantities generated by each borough now and in 2035*

<b>Borough</b>	<b>Current quantity of wastewater treated (m<sup>3</sup>/yr)</b>	<b>Current volume of sludge (Total dissolved solids - tDS/yr)</b>	<b>Quantity of wastewater treated by 2035 (m<sup>3</sup>/yr)</b>	<b>Volume of sludge by 2035 (tDS/yr)</b>
Croydon	11,179,842	6,309	11,570,942	6,552
Kingston	10,938,459	5,429	11,378,691	5,666
Merton	9,657,944	5,685	10,240,412	6,059
Sutton	21,113,960	11,547	22,545,500	12,366
<b>Total</b>	<b>52,890,205</b>	<b>28,970</b>	<b>55,735,545</b>	<b>30,643</b>

Source: Thames Water

- 4.5.1.3 The four boroughs are served across Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works (STW). Thames Water have informed us that these all have adequate capacity to manage the incoming sewage and have all had major capacity increases during Asset Management Plan (AMP) 5 (2010 to 2015) and/or AMP6 (2015 to 2020).

<sup>14</sup> <https://corporate.thameswater.co.uk/Media/Facts-and-figures>



4.5.1.4 AMP7 will cover the period from 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2025, for which the plan will be agreed by summer 2019<sup>15</sup>. Some of the activities currently planned are:

- Capital maintenance;
- Hogsmill STW biodiversity enhancements;
- Crossness (STW) increased flow to full treatment capacity;
- Crossness (STW) growth capacity (to 2026);
- Hogsmill STW CHP plant replacement;
- Long Reach STW CHP replacement; and
- Long Reach STW flow to treatment capacity.

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<sup>15</sup> <https://corporate.thameswater.co.uk/About-us/our-strategies-and-plans/our-5-year-plan-for-2020-to-2025>

## 5 Waste Capacity Assessment

### 5.1 Introduction

5.1.1.1 This chapter of the report addresses the waste facilities within each of the SLWP area boroughs, and determines which facilities are considered relevant to count towards to the GLA's draft London Plan apportionment figures, or those facilities which accept other waste types.

### 5.2 Apportionment Criteria

5.2.1.1 In assessing what available waste management capacity counts towards SLWP boroughs' apportionment targets, the assumptions reported in the draft London Plan have been used as detailed in Table 15, showing London Plan criteria and examples of facility types these could include.

*Table 15: Assumptions – capacity applicable to achieving apportionment targets*

London Plan Criteria	Waste Management Facilities
Used in London for energy recovery	Energy recovery facility, energy from waste facility, anaerobic digestion
Materials sorted or bulked in London facilities for reuse (including repair and re-manufacture), reprocessing or recycling	Materials Recycling Facility (MRF) or other materials sorting facility, transfer stations
Material reused, recycled or reprocessed in London	Material reprocessor, reuse facility, composting facility (permitted and exempt), anaerobic digestion facility
Produced as a solid recovered fuel (SRF) or a high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition <sup>16</sup> as a minimum	Refuse derived fuel (RDF) or Solid Recovered Fuel (SRF) production facilities (if Renewable Obligation Order requirements are met)

<sup>16</sup> Refuse derived fuel (RDF) consists of residual waste that complies with the specifications in a written contract between the producer of the RDF and a permitted end-user for the thermal treatment of the waste in an energy from waste facility or a facility undertaking co-incineration such as cement and lime kilns. The written contract must include the end-user's technical specifications relating as a minimum to the calorific value, the moisture content, the form and quantity of the RDF.

## 5.2.2 Transfer Stations

- 5.2.2.1 Transfer stations operated by waste management contractors tend to bulk collected wastes before transporting to other facilities for, for instance, landfilling, energy recovery or separation for recycling. As such this capacity does not count towards the London apportionment. However, many transfer stations do practise basic separation of recyclates from input waste materials before they are bulked for onward transport, and this recycling can be counted towards the apportionment targets. To assess the level of recycling at individual transfer stations, the outputs of these facilities were examined using data from the Environment Agency's WDI dataset over the last five years (to 2017) to produce an average recycling rate. Applying this figure to the operational transfer capacity of the facility gave the recycling capacity relevant to the London apportionment targets. This approach has been agreed and discussed with the EA.
- 5.2.2.2 T4 exempt<sup>17</sup> sites (preparatory treatments, such as, baling, sorting, shredding – see notes following) tend to be small scale sorting or baling facilities of mainly recyclates, operated often at the site the waste is produced e.g. retail complexes, hospitals, rail operators, small waste operators, or are akin to small scale materials recycling facilities, and therefore for this study are considered relevant capacity to the apportionment targets.
- 5.2.2.3 While no specific criteria has been outlined as to what constitutes 'waste management' for C&D waste sites, the same assumptions have been used as the apportionment i.e. average recycling rate has been applied.
- 5.2.2.4 Also, it should be noted that many sites do not only receive household, industrial and commercial (HIC) or C&D waste. Instead they are likely to receive both. Therefore, capacities between HIC and C&D have been based on average inputs over the last five years, as reported in the EA's WDI.

## 5.2.3 Environmental Permitted and Exempt Sites

- 5.2.3.1 Environmental permits are required for activities that could pollute the air, water or land, increase flood risk or adversely affect land drainage. Permits are usually required for operations that manufacture potentially harmful substances, and for waste operations such as landfills,

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<sup>17</sup> These are sites exempt from environmental permitting, either because of the low pollution risk of their operation.

incineration plants and sites where waste is recycled, stored, treated or disposed of. As well as operations which do present a pollution risk, and therefore need to apply for a permit, some activities can be excluded from permitting altogether (i.e. they represent no pollution risk and therefore need no permit) or exempted from permitting (i.e. represent a low pollution risk).

- 5.2.3.2 Using Environment Agency permitted capacity data to assess overall capacity of individual sites can be problematic. This is because permitted capacities are based on capacity bands into which permits are divided rather than the operating annual capacity of the site, and, therefore, the capacity detailed in the licence tends to be at the top end of the charging bands. Therefore, many sites give permitted capacities of 74,999 tonnes, 24,999 tonnes and 4,999 tonnes and it is likely that such figures used are over estimates of actual operational capacities.
- 5.2.3.3 Similarly, planning permissions do not always accurately reflect what throughput a facility can actually achieve on a practical level. This is because a planning application presents a theoretical throughput before the facility is built. Often this is the maximum capacity allowed by the Environment Agency Permit. Once the site is operational other influences can come into play over time, like locational constraints, market conditions or viability issues. The draft new London Plan says 'when assessing the throughput of a site, the maximum throughput achieved over the last five years should be used.' Therefore, additional datasets, predominantly WDI, have been used to estimate actual operational capacity using this methodology.
- 5.2.3.4 Exempted sites still need to register their operations with the Environment Agency but have a much lower reporting requirement than permitted sites.
- 5.2.3.5 Exemptions are classified under a range of 57 paragraph descriptions categorised as U (use of waste), T (treatment of waste), D (disposal of waste and S (storage of waste). Each exemption has associated with it a number of conditions which have to be met before an exemption can be issued.
- 5.2.3.6 For example: Waste exemption: T4 preparatory treatments, such as, baling, sorting, shredding covers activities such as baling loose paper and cardboard before transporting it to another site for recycling; baling and shredding aluminium cans and sorting different types of plastic bottles. It cannot cover the treatment of hazardous waste or the baling of waste before it is sent to landfill or incineration. Throughput limits set for T4 operations depending upon which material are handled.

5.2.3.7 A list of exemptions registered within each of the boroughs has been provided by the Environment Agency. Those exemptions relevant to this study are summarised in Table 16. Similarly to permits, exemptions are limited up to a tonnage which is not necessarily reflective of the operational capacity. Therefore, an assumed capacity (sourced from Defra guidance<sup>18</sup>) for each exemption type has been used to estimate the operational capacity of each of the sites operating under exemptions. This is not a standard percentage assumption but instead is based on data gathered by the Defra study with regards to the likely size of these exempt operations.

*Table 16: Assumed exemptions relevant to London apportionment targets*

Exemption Description	Maximum Capacity (tpa)	Assumed Capacity (tpa)
D6 disposal by incineration (wood waste)	5	5
T1 cleaning, washing, spraying or coating relevant waste	15,600	1,200
T10 sorting mixed waste	520	520
T2 recovering textiles	5,000	2,000
T11 repairing or refurbishing waste electrical and electronic equipment (WEEE)	1,000	500
T12 manually treating waste for reuse e.g. bric-a-brac, furniture, clothing	60	60
T23 aerobic composting and associated prior treatment	400	400

<sup>18</sup> Defra's "New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England", 2014

Exemption Description	Maximum Capacity (tpa)	Assumed Capacity (tpa)
T25 anaerobic digestion at premises not used for agriculture and burning resulting biogas	1,000	1,000
T4 preparatory treatments, such as, baling, sorting, shredding (typical capacity given)	150,000	5,000

Source: Assumed capacities were taken from Defra's "New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England" (2014)

- 5.2.3.8 Details regarding the size of these sites are not kept by the Environment Agency. It should also be noted, that these sites are unlikely to become available for other waste uses, should the existing waste activity cease, as often the main activity on these sites is not waste management which is often ancillary to the main activity.
- 5.2.3.9 There are also additional sites which are permitted by local authorities e.g. small-scale incinerators treating less than 3 tonnes a day. Information of this nature was sought from each of the environmental health teams, but no relevant sites were found to exist within SLWP area.

### 5.3 London Borough of Croydon

#### 5.3.1 Permitted Capacity

- 5.3.1.1 LB Croydon has ten permitted waste sites (see Table 17). Only two of these sites are considered as waste management, and therefore can be taken in their entirety to count towards meeting capacity targets for either apportioned or C&D waste.
- 5.3.1.2 These are the two metal recycling sites, and together have an operational capacity of ~4,500 tpa.
- 5.3.1.3 The remaining eight sites are transfer stations, and as such, some of capacity has been identified as relevant to count towards either apportioned or C&D waste, based on the proportion of outputs recovered (as described in section 5.2.2).
- 5.3.1.4 Two of these sites are household waste amenity sites. These are facilities for the public to drop off both residual and recyclable materials, and the recyclable portion of these are relevant to the apportionment, contributing ~16,300 tpa of capacity. Along with an additional transfer station, a total of ~25,300 tpa of the 343,000 tpa of operational transfer capacity has

been counted as capacity contributing towards meeting the apportionment.

- 5.3.1.5 In addition, the Factory Lane waste transfer station accepts C&D waste, which is sent for recovery, and therefore ~5,200 tpa is considered to manage C&D waste. However, in total there is at least ~238,600 tpa of dedicated transfer capacity for CD&E waste, along with some additional at sites which accept both HIC and C&D wastes.

Table 17: Permitted waste sites in LB Croydon

Operator	Site Name / Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
Croydon Car Spares Ltd	Croydon Car Spares, 111 Aurelia Road, Croydon, Surrey, CR0 3BF	A19 : Metal Recycling Site (Vehicle Dismantler)	HIC / Hazardous	0.05	572	241	241	0
New Era Assets Limited	New Era Metals, 51 Imperial Way, Croydon, Surrey, CR0 4RR,	A19 : Metal Recycling Site (Vehicle Dismantler)	HIC / Hazardous		4,999	4,213	4,213	0
Veolia E S ( U K) Limited	Fishers Farm, North Downs Road, New Addington, Croydon,	A13 : Household Waste Amenity Site	HIC	0.2	15,125	6,895	4,542	0



Operator	Site Name / Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
	Surrey, CR0 0LF							
Veolia E S ( U K) Limited	Purley Oaks Civic Amenity Site, Brighton Road, Purely, CR8 2BG	A13 : Household Waste Amenity Site	HIC	0.22	12,535	9,099	6,684	0
Mr John Oliver Curley	Curley Skip Hire, 64 Northwood Rd, Thornton Heath	A11 : Household, Commercial & Industrial Waste T Stn	HIC / C&D	0.07	10,920	9,294	0	0
Veolia E S ( U K) Limited	Factory Lane Special Waste Transfer Station, Factory Lane, Croydon, CR0 3RL	A11 : Household, Commercial & Industrial Waste T Stn	HIC / C&D	1.79	200,000	19,736	9,623	5,206

Operator	Site Name / Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
Mr Samuel Smith	Peartree Farm, Featherbed Lane, Addington, Croydon, CR0 9AA	A11 : Household, Commercial & Industrial Waste T Stn	HIC / C&D	0.21	37,500	59,282	0	0
Able Waste Services Limited	Able Waste Services Ltd, 43 Imperial Way, Croydon, CR0 4RR	S0803 : HCI Waste TS + treatment	C&D		74,999	46,463	0	43,268
Day Group Ltd	Day Aggregates Purley Depot, Station Yard, Approach Road, Purley, CR8 2AL	S0906: Inert and excavation WTS with treatment	C&D		249,999	179,300	0	0

Operator	Site Name / Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
Henry Woods Waste Management Ltd	Henry Woods Waste Management Ltd, Land Adjacent to Unit 9, Mill Lane Trading Est., Croydon, CR0 0PL	S0803 : HCI Waste TS + treatment	C&D		74,999	12,885	0	0
Total transfer capacity					676,077	342,954	20,849	48,474
Total Reuse & Recycling capacity					5,571	4,454	4,454	0
Total					681,648	347,408	25,303	48,474

### 5.3.2 Exempt Capacity

5.3.2.1 According to the EA, there are a number of sites which manage waste under an exemption, as opposed to requiring full permits. Table 18 presents the information regarding the relevant sites which are considered to count towards meeting the GLA apportionment target (see Appendix 1 for full details). These have been determined as described in section 5.2.3.

5.3.2.2 The total approximate waste treatment capacity operating under exemptions is 7,580 tpa. The majority of this is the preparation of dry recyclates for onward transport direct to reprocessors and recovery of scrap metal.

*Table 18: Sites operating under exemptions in LB Croydon*

Type of exemption	No. of sites operating under this exemption	Total capacity (tpa)
T4	1	5,000
T10	1	520
T11	4	2,000
T12	1	60
<b>Total</b>	<b>7</b>	<b>7,580</b>

Source: EA Register of waste exemptions

### 5.3.3 Capacity Gap Conclusions

5.3.3.1 Table 19 shows that taking into consideration the management capacity within LB Croydon which meets the apportionment criteria, the capacity gap will be ~219,000 tpa in 2021, which will increase to 231,000 tpa by 2036, due to increases in the apportionment target over that period.

*Table 19: Apportionment capacity, targets and calculated capacity gap for LB Croydon by waste management type (tonnes per annum)*

	2021	2026	2031	2036
Transfer	20,849	20,849	20,849	20,849
Recycling and Reuse	4,454	4,454	4,454	4,454
Exemptions	7,580	7,580	7,580	7,580
Total Management Capacity	32,883	32,883	32,883	32,883
Apportionment targets	252,000	256,000	260,000	264,000
<b>Capacity gap</b>	<b>219,117</b>	<b>223,117</b>	<b>227,117</b>	<b>231,117</b>

Source: Anthesis

5.3.3.2 Table 20 shows that the capacity gap for what is considered management of C&D waste, is ~244,500 tpa in 2021, rising to ~256,200 tpa by 2036, due to an anticipated increased in C&D waste.

*Table 20: Management capacity for C&D waste, arisings and calculated capacity gap*

	2021	2026	2031	2036
Transfer	48,474	48,474	48,474	48,474
C&D waste arisings	292,970	295,009	300,929	304,696
<b>Capacity gap</b>	<b>244,496</b>	<b>246,534</b>	<b>252,455</b>	<b>256,221</b>

Source: Anthesis

5.3.3.3 Table 21 shows that the total capacity gap is 501,800 tpa increasing to ~525,500 tpa in 2036. The estimated land requirement to meet this capacity gap is 8.76 hectares<sup>19</sup>.

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<sup>19</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.

Table 21: Summary of capacity gaps for LB Croydon

	2021	2026	2031	2036
Target	544,970	551,009	560,929	568,696
Capacity	81,357	81,357	81,357	81,357
Capacity gap	463,613	469,651	479,572	487,338
Land requirement (ha)	7.73	7.83	7.99	8.12

Source: Anthesis

## 5.4 Royal Borough of Kingston-upon-Thames

### 5.4.1 Permitted Capacity

- 5.4.1.1 RB Kingston has four permitted waste sites (see Table 22), one of which is considered to be waste management of apportioned waste. This site is a WEEE recycling facility, which has an operational capacity of ~1,600 tpa.
- 5.4.1.2 The two others sites accepting HIC waste are transfer stations, and as such, some of its capacity has been identified as relevant to count towards either apportioned or C&D waste, based on the proportion of outputs recovered (as described in section 5.2.2).
- 5.4.1.3 One of these sites is a household waste amenity site. Of the outputs from this site, ~9,400 tpa of the 14,400 tpa operational capacity are recycled. Another transfer station contributes ~19,600 tpa towards the apportionment.
- 5.4.1.4 The Chessington Equestrian Centre has a permit to accept waste to land as a recovery operation. On average it has accepted ~44,300 tpa over the last three years (the site did not have the permit prior to 2015). However, it accepts excavation waste, rather than C&D, and therefore is not included in the capacity gap calculations for RB Kingston.

Table 22: Permitted waste sites in RB of Kingston-upon-Thames

Operator	Site Name / Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
Genuine Solutions Group Limited	Genuine Solutions Group Ltd., Solutions House, Unit 1 H Q3, 223 Hook Rise South, Surbiton, KT6 7LD	S0823 : WEEE treatment facility	HIC		74,999	1,630	1,630	0
Veolia E S ( U K ) Limited	Kingston Civic Amenity Site, Chapel Mill Road, Kingston upon Thames, KT1 3GZ	A13 : Household Waste Amenity Site	HIC		25,000	14,363	9,392	0
Viridor Waste Management Ltd	Kingston Waste Transfer Station, Chapel Mill Road, Off Villiers Road, Kingston upon Thames, KT1 3GZ	A11 : Household, Commercial & Industrial Waste T Stn	HIC	2.03	200,500	68,883	19,620	0

Operator	Site Name / Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
B L Penwarden Haulage & Demolition Contractors Limited	Chessington Equestrian Centre, Clayton Road, Chessington, KT9 1NN	A25 : Deposit of waste to land as a recovery operation	Inert/C&D		99,999	44,285	0	0
<b>Total transfer capacity</b>					225,500	83,246	29,011	0
<b>Total Land reclamation</b>					99,999	44,285	0	0
<b>Total Reuse &amp; Recycling capacity</b>					74,999	1,630	1,630	0
<b>Total</b>					400,498	129,160	30,641	0



## 5.4.2 Exempt Capacity

5.4.2.1 According to the EA, there is only one site which manages waste under an exemption, as opposed to requiring full permits. Table 23 shows that it a T4 exemption at Kingston Hospital, which has an estimated capacity of 5,000 tpa, which is considered to count towards meeting the GLA apportionment target (see Appendix 1 for full details). These have been determined as described in section 5.2.3.

*Table 23: Sites operating under exemptions in RB of Kingston-upon-Thames*

Type of exemption	No. of sites operating under this exemption
T4	1

Source: EA Register of waste exemptions

## 5.4.3 Capacity Gap Conclusions

5.4.3.1 Table 19 shows that taking into consideration the management capacity within RB Kingston which meets the apportionment criteria, the capacity gap will be ~151,400 tpa in 2021, which will increase to ~160,400 tpa by 2036, due to increases in the apportionment target over that period.

*Table 24: Apportionment capacity, targets and calculated capacity gap for RB of Kingston-upon-Thames by waste management type (tonnes per annum)*

	2021	2026	2031	2036
Transfer	29,011	29,011	29,011	29,011
Recycling and Reuse	1,630	1,630	1,630	1,630
Exemptions	5,000	5,000	5,000	5,000
Total Management Capacity	35,641	35,641	35,641	35,641
Apportionment targets	187,000	190,000	193,000	196,000
<b>Capacity gap</b>	<b>151,359</b>	<b>154,359</b>	<b>157,359</b>	<b>160,359</b>

Source: Anthesis

5.4.3.2 Table 20 shows that the capacity gap for what is considered management of C&D waste, is ~37,900 tpa in 2021, rising to ~39,000 tpa by 2036, due to an anticipated increase in C&D waste. The capacity gap represents the whole C&D waste arisings, as there are no C&D waste management sites.

*Table 25: Management capacity for C&D waste, arisings and calculated capacity gap*

	2021	2026	2031	2036
Capacity	0	0	0	0
C&D waste arisings	37,887	38,279	39,040	39,040
<b>Capacity gap</b>	<b>37,887</b>	<b>38,279</b>	<b>39,040</b>	<b>39,040</b>

Source: Anthesis

5.4.3.3 Table 21 shows that the total capacity gap is ~189,200 tpa increasing to ~199,400 tpa in 2036. The estimated land requirement to meet this capacity gap is 3.32 hectares<sup>20</sup>.

*Table 26: Summary of capacity gaps for RB of Kingston-upon-Thames*

	2021	2026	2031	2036
Target	224,887	228,279	232,040	235,040
Capacity	35,641	35,641	35,641	35,641
Capacity gap	189,246	192,638	196,399	199,399
Land requirement (ha)	3.15	3.21	3.27	3.32

Source: Anthesis

## 5.5 London Borough of Merton

### 5.5.1 Permitted Capacity

5.5.1.1 LB Merton has 17 permitted waste sites (see Table 27), three of which are considered to be waste management of apportioned waste.

<sup>20</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.

- 5.5.1.2 One site is a metals recycling site which recycles 70,100 tpa. Two sites treat organic wastes (one composting, one anaerobic digestion), and between them they treat ~98,100tpa.
- 5.5.1.3 In addition, four transfer stations accepting HIC waste are deemed to contribute towards the apportionment. One of these is a household waste amenity site. Of the outputs from this site, ~9,900 tpa of the 14,600 tpa operational capacity are recycled.
- 5.5.1.4 Suez runs two transfer stations within the borough, which both accept a combination of household, C&I and C&D wastes. Benedict Wharf is the larger of the two sites, and as well as sorting and bulking materials for onward recycling, they produce an RDF on-site which goes to energy recovery. Under the Draft London Plan, this is included in the definition of waste management, and as such, can be counted towards the apportionment. Therefore 106,800 tpa of the 275,000 tpa capacity is included towards the apportionment.
- 5.5.1.5 However, Merton's Stage 2 Local Plan included a proposed allocation for this site as residential use, but this is subject to the acceptance of planning permission for another site to provide compensatory capacity at Beddington Lane (see section 6.3.2). This site is within LB Sutton.
- 5.5.1.6 Another transfer station operated by One Waste Clearance has very recently (mid-April 2019) started operating. Therefore, there is no data available regarding actual throughputs as the latest is from 2017. Discussions were had with the operator who estimates that 90% of the waste inputs are recycled. It has an operational capacity of 20,000 tpa, and so 18,000 tpa is assumed to be deemed as waste management. The split between treating apportioned waste and C&D waste was assumed to be 75%:25%.<sup>21</sup>
- 5.5.1.7 There is also a small hazardous waste transfer station within LB Merton, which has a permitted capacity of 24,999 tpa, has accepted a maximum of ~140 tonnes over the last five years.
- 5.5.1.8 There are nine sites which accept exclusively CD&E wastes. One recycles soil and the outputs are predominantly sent to landfill. The remaining sites are transfer stations. Together they provide ~369,900 tpa of transfer capacity for CD&E wastes. Of the proportion of the inputs which are C&D wastes and that are recovered, ~145,600 tpa of the capacity of these sites

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<sup>21</sup> Based on the proportions of split of other similar sites across the SLWP area.

are considered to manage C&D wastes. Together with an additional 4,400 tpa from the Benedict Wharf site, the total management capacity of C&D wastes in LB Merton is ~150,100 tpa.

Table 27: Permitted waste sites in LB Merton

Operator	Site Name / Site Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
European Metal Recycling Limited	B Nebbett & Son, Ellis Road, Willow Lane Ind. Estate, Mitcham, CR4 4HX	A20 : Metal Recycling Site (mixed MRS's)	HIC	1.03	109,500	70,100	70,100	0
Riverside Bio Limited	Mitcham Waste Treatment Centre, 43 Willow Lane, CR4 4NA	Composting installation	HIC	0.88	100,000	51,715	51,715	0
Riverside AD Limited	Riverside AD Facility, 43 Willow Lane, CR4 4NA	Other Biological Treatment installation	HIC		999,999	46,341	46,341	0
Veolia E S ( U K ) Limited	Garth Road Civic Amenity Site, 63-69 Amenity Way, Garth Road,	A13 : Household Waste Amenity Site	HIC	2.05	25,000	14,594	9,866	0

Operator	Site Name / Site Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
	Morden, SM4 4AX							
Veolia E S ( U K) Limited	Garth Road Transfer Station, 63-69 Amenity Way, Garth Road, Morden, SM4 4AX	A9 : Haz Waste Transfer Station	HIC /hazardous		22,281	18,839	15,704	0
Suez Recycling & Recovery South East Ltd	Benedict Wharf (Mitcham Transfer Station), Benedict Road, Mitcham, CR4 3BQ	A11 : Household, Commercial & Industrial Waste T Stn	HIC/ C&D	3.6	275,000	275,000	106,826	4,435
Suez Recycling And Recovery U K Ltd	Morden Transfer Station, Amenity Way, Garth Road, Morden, SM4 4AX	A11 : Household, Commercial & Industrial Waste T Stn	HIC/ C&D	0.79	74,999	39,950	0	0

Operator	Site Name / Site Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
One Waste Clearance	One Waste Clearance, Unit 2, Abbey Industrial Est., 24 Willow Lane, Mitcham, CR4 4NA	SR2015 No6: 75kte HCI Waste	HIC / C&D	0.1	75,000	20,000	13,453	4,547
Wandle Waste Management Limited	Unit 7, Abbey Industrial Estate, 24 Willow Lane, CR4 8NA	A9 : Haz Waste Transfer Station	Hazardous		24,999	141	0	0
U K And European Construction Limited	Unit 5, Willow Lane Industrial Estate, 39a Willow Lane, Mitcham, CR4 8NA	SR2010 No12: Treatment of waste to produce soil <75,000 tpy	C&D		75,000	804	0	0
L M D Waste Management Ltd	32 Willow Lane, Mitcham, CR4 4NA	A14 : Transfer Station taking Non-	C&D	0.06	50,000	38,738	0	33,845

Operator	Site Name / Site Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
		Biodegradable Wastes						
N J B Recycling Limited	77 Weir Road, Wimbledon, SW19 8UG	S0803 : HCI Waste TS + treatment	C&D		75,000	48,687	0	18,030
Penfold Thomas	B & T @ Work, Abbey Industrial Estate, Unit 5c Willow Lane, Mitcham, CR4 4NA	A11 : Household, Commercial & Industrial Waste T Stn	C&D		5,000	3,729	0	0
George Killoughery Limited	George Killoughery Limited (Mitcham), 43a Willow Lane, Mitcham, CR4 4NA	A11 : Household, Commercial & Industrial Waste T Stn	C&D		74,999	71,253	0	0



Operator	Site Name / Site Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
L M D Waste Management Limited	L M D Waste Management Limited, Yard 7, Wandle Way, Mitcham, CR4 4NA	S0803 : HCI Waste TS + treatment	C&D		74,999	24,444	0	20,774
Maguire Skips Ltd	Maguire Skips, Storage Lane Wandle Way, Willow Lane Industrial Estate, Mitcham, CR4 4NS	S0810 : Inert & Excavation Waste TS	C&D		74,999	58,150	0	0
Reston Waste Management Ltd	Waste Transfer And Recovery Facility, Unit 4-6, Weir Road, Wimbledon, CR4 4NB	S0803 : HCI Waste TS + treatment	C&D		74,999	71,595	0	30,131

Operator	Site Name / Site Address	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
Maguire Skips Limited	Weir Road Waste Transfer Station, 36 Weir Court, Wimbledon, SW19 8UG	S0803 : HCl Waste TS + treatment	C&D		74,999	53,313	0	42,856
Total transfer capacity					1,002,274	738,435	145,850	154,618
Total Reuse & Recycling capacity					109,500	70,100	70,100	-
Total Composting & Anaerobic Digestion (AD)					1,099,999	98,056	98,056	-
Other Treatment					75,000	804	-	-
Total					2,286,773	907,395	314,006	154,618

### 5.5.2 Exempt Capacity

5.5.2.1 According to the EA, there are three sites which manage waste under an exemption, as opposed to requiring full permits, two of which repair or refurbish WEEE (Table 28) and have a total anticipated capacity of 1,000 tpa, which is considered to count towards meeting the GLA apportionment target (see Appendix 1 for full details). The third site is operated by Deadman Confidential and is a T4 exemption, assumed to be of 5,000 tpa These have been determined as described in section 5.2.3.

*Table 28: Sites operating under exemptions in LB Merton*

Type of exemption	No. of sites operating under this exemption	Total capacity (tpa)
T4	1	5,000
T11	2	1,000

Source: EA Register of waste exemptions

### 5.5.3 Capacity Gap Conclusions

5.5.3.1 Table 29 shows that taking into consideration the management capacity within LB Merton which meets the apportionment criteria, there will be more capacity than required to meet the apportionment targets, up until 2036. The surplus decreases from ~82,000 tpa to ~70,800 tpa due to increasing apportionment target over the period.

5.5.3.2 However, if Benedict Wharf is lost to housing, and the replacement capacity is to be sited in LB Sutton and therefore would increase Merton’s capacity gap (see Section 6).

*Table 29: Apportionment capacity, targets and calculated capacity gap for LB Merton by waste management type (tonnes per annum)*

	2021	2026	2031	2036
Transfer	145,850	145,850	145,850	145,850
Recycling and Reuse	70,100	70,100	70,100	70,100
Composting and AD	98,056	98,056	98,056	98,056
Exemptions	6,000	6,000	6,000	6,000
Total Management Capacity	320,006	320,006	320,006	320,006
Apportionment targets	238,000	241,750	245,500	249,250
<b>Capacity gap</b>	<b>-82,006</b>	<b>-78,256</b>	<b>-74,506</b>	<b>-70,756</b>

Source: Anthesis

5.5.3.3 Table 30 shows that there is also a surplus in capacity gap for management of C&D waste. A surplus of ~106,600 tpa is expected to decrease to ~100,600 tpa due to an anticipated increase in C&D waste. However, Benedict Wharf does also accept a small quantity of C&D waste, and therefore the potential loss of this site will also mean a small reduction in the surplus. However, LB Merton is still expected to maintain a surplus of waste management sites for C&D waste despite the loss of Benedict Wharf.

*Table 30: Management capacity for C&D waste, arisings and calculated capacity gap*

	2021	2026	2031	2036
Capacity	154,618	154,618	154,618	154,618
C&D waste arisings	47,975	50,071	52,102	54,037
<b>Capacity gap</b>	<b>-106,643</b>	<b>-104,547</b>	<b>-102,517</b>	<b>-100,581</b>

Source: Anthesis

5.5.3.4 Table 31 shows that there is a total surplus capacity of ~188,600 tpa decreasing to ~171,300 tpa in 2036.

Table 31: Summary of capacity gaps for LB Merton

	2021	2026	2031	2036
Target	285,975	291,821	297,602	303,287
Capacity	474,624	474,624	474,624	474,624
Capacity gap	-188,649	-182,802	-177,022	-171,337
Land requirement (ha) <sup>22</sup>	-3.14	-3.05	-2.95	-2.86

Source: Anthesis

## 5.6 London Borough of Sutton

### 5.6.1 Permitted Capacities

- 5.6.1.1 LB Sutton has twelve permitted waste sites (see Table 32). The Beddington Farmlands Landfill site receives ~308,700 tpa, of household, C&I and CD&E wastes each year. Although landfill is a final destination for waste, it does not meet the GLA's London Plan apportionment criteria. Therefore, it has not been counted towards the apportionment. The site has planning permission until 2023, after which is expected to close and the land will be incorporated into the Wandle Valley Regional Park.
- 5.6.1.2 The Beddington Farmlands Energy Recovery Facility (ERF) is due to become fully operational imminently, and will accept 200,000 tpa of residual waste from the SLWP, allowing for the treatment of an additional 75,000 tpa of commercial waste. The intended capacity of the facility is therefore 275,000 tpa, however it has been permitted up to 302,500 tpa, to allow for a drop in the calorific value of the waste. If there is a calorific value drop (due to a change in composition), in order to maintain the energy output of the facility, the maximum throughput is allowed to go up to 302,500 tpa. However, as the intended capacity is 275,000 tpa, this has been taken as the value contributing to the apportionment.
- 5.6.1.3 Viridor Recycling & Composting Centre is permitted as a transfer station, and input/output data is not definitive in enabling the capacity between the transfer and composting operations to be split. Therefore, only a relatively small proportion of this site has been determined as meeting apportionment criteria, based on the proportion of outputs going for

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<sup>22</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.

recycling. This site is also subject to temporary planning permissions, which is due to expire in 2023, and so this site has not been included in the longer-term capacity calculations.

- 5.6.1.4 The 777 Recycling Centre operates as a material recovery facility and accepts various types of wastes including separately collected materials, as well as mixed waste streams from household, C&I and C&D sources. The existing capacity of the site is 56,900 tpa and has been split between treating apportioned waste and C&D waste. This site has also been identified as having the opportunity for expansion, with the potential to treat up to 250,000 tpa (see Section 6).
- 5.6.1.5 In addition, five transfer stations accepting HIC waste are deemed to contribute towards the apportionment. One of these is a household waste amenity site. Of the outputs from this site, ~8,600 tpa of the 14,800 tpa operational capacity are recycled.
- 5.6.1.6 For two of these sites, no data was available from WDI as they've started operating relatively recently. Discussions with the operators have indicated that both sites on average recycle 90% of their inputs. The split between treating apportioned waste and C&D waste was assumed to be 75%.25%.<sup>23</sup>
- 5.6.1.7 There are three additional sites, which have not been included in waste management capacity calculations. One site accepts and processes water containing non-hazardous soils and stones to enable the recovery and re-use of those materials. The King Concrete site operates purely as a transfer facility for C&D materials.
- 5.6.1.8 There is also a clinical waste transfer station, which has accepted a maximum of ~9,600 tpa over the last five years.
- 5.6.1.9 In addition to these existing sites, there is a transfer station with planning permission to become operational by 2021. This site will be operated by TGM (previously Deadman Confidential) and will bulk and bale predominantly paper, but some plastics, for onward reprocessing. Therefore, the whole site capacity of 15,000 tpa is considered to count towards the apportionment.

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<sup>23</sup> Based on the proportions of split of other similar sites across the SLWP area.

Table 32: Permitted waste sites in LB Sutton

Operator	Site Name	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
Viridor Waste Management Limited	Beddington Farmlands Landfill Site, 105 Beddington Lane, CR0 4TD	L04 : Non Hazardous Landfill	HIC/ C&D		990,000	308,661	0	0
Viridor Waste Management Limited	Beddington Farmlands Energy Recovery Facility (ERF), 105 Beddington Lane, CR0 4TD	Energy from Waste	HIC	97.2	302,500	275,000	275,000	0
Viridor Waste (Thames) Ltd	Viridor Recycling & Composting Centre, 105	A11 : Household, Commercial & Industrial Waste T Stn	HIC	5.02	240,000	103,751	22,074	0

Operator	Site Name	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
	Beddington Lane, CR0 4TD							
777 Recycling Centre Ltd	777 Recycling Centre Ltd, 158 Beddington Lane, CR0 4TE	A15 : Material Recycling Treatment Facility	HIC/ C&D	0.97	372,600	56,912	20,625	32,972
Veolia E S Cleanaway ( U K ) Ltd	Croydon Transfer Station, Lane/premises at Endeavour Way, Beddington Farm Road, CR0 4XB	S0803 : HCI Waste TS + treatment	HIC	0.74	75,000	27,799	21,113	0
Veolia E S ( U K ) Limited	Kimpton Park Way H R R C,	A13 : Household Waste Amenity Site	HIC	0.44	24,999	14,799	8,640	0



Operator	Site Name	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
	Kimpton Road, SM3 9QP							
TGM (previously Deadman Confidential)	112 Beddington Lane, CR0 4TD	Transfer	HIC	1.7	Not known	15,000	15,000	0
Raven Waste Paper Company Ltd	Raven Recycling, Unit 8-9 Endeavour Way, Beddington Farm Road, CR0 4TR	S0803 : HCI Waste TS + treatment	HIC/ C&D		74,999	15,224	5,310	5,506
Hinton Skips	Hinton Skips UK Ltd, Rear or 112 Beddington Lane, CR0 4TD	S1506 No6: 75kte HCI Waste TS + treatment	HIC / C&D	0.6	74,999	8,000	5,381	1,819

Operator	Site Name	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
Premier Skip Hire	Premier Skip Hire, 12 Sandiford Road, Kimpton Industrial Estate, SM3 9RD	S0803 No3: 75kte HCI Waste TS + treatment	HIC / C&D	0.1	75,000	12,000	8,072	2,728
Hydro Cleansing Limited	H C L House, Beddington Farm Road, CR0 4XB	A16 : Physical Treatment Facility	HIC/ C&D		100,000	13,912	0	0
King Concrete Limited	124 Beddington Lane, CR0 4YZ	S1506: 75kte HCI Waste TS + Treatment	C&D		74,999	1,060	0	0
Cannon Hygiene Limited	Mitcham Site, Beddington Lane Industrial Estate, Unit 4	S0824 : Clinical Waste Transfer Station	Hazardous		75,000	9,601	0	0

Operator	Site Name	Permit type	Input waste types	Site area (ha)	Permitted capacity (tpa)	Operational capacity (tpa)	Capacity applicable to apportionment	Capacity applicable for C&D waste
	Beddington Lane, CR0 4TG							
Total transfer capacity					714,996	2017,234	85,589	10,053
Total Reuse & Recycling capacity					372,600	56,912	20,625	32,972
Other Treatment					100,000	13,912	0	0
Non-hazardous Landfill					990,000	308,661	0	0
Energy from Waste					302,500	275,000	275,000	0
Total					2,480,096	861,719	381,214	43,026

## 5.6.2 Pipeline Capacity

- 5.6.2.1 In addition to these existing sites, Suez has a live planning application in with LB Sutton for a new facility at Beddington Lane, which would include the following waste processing operations:
- Refuse Derived Fuel (RDF) preparation operations (240,000tpa);
  - Recyclable bulking operations (25,000tpa);
  - Wood bulking and transfer operations (40,000tpa); and
  - Waste segregation and transfer operations (45,000tpa).
- 5.6.2.2 Confirmation has been received from Suez that all capacity meets the criteria for ‘managed waste’ and can be counted towards apportioned waste capacity, with the exception of 45,000 ‘waste segregation and transfer operations’ which is fed into other parts of the process. The RDF and wood product will not be used in another South London facility so there is no risk of double-counting capacity.
- 5.6.2.3 New Yard Services have a live planning application in for Brook House, 5 Kimpton Road, Sutton, SM3 9QL. The application is for the demolition of existing office and industrial warehouse to form a new waste recycling centre and office block. The application states that the facility will recycle up to 52,000 tonnes of CD&E waste per annum but given the site is 0.2 ha, it has been assumed this may realistically be lower at around 20,000 tpa, so this more conservative figure has been used. The application is currently pending consideration with a decision due by 5<sup>th</sup> June 2019.
- 5.6.2.4 How these two sites may contribute to both apportionment and CD&E waste management capacity is considered in Section 6.

## 5.6.3 Exempt Capacity

- 5.6.3.1 According to the EA, there is only one site which manages waste under a T11 exemption (see Table 33) and have a total anticipated capacity of 500 tpa, which is considered to count towards meeting the GLA apportionment target (see Appendix 1 for full details). These have been determined as described in section 5.2.3.

*Table 33: Sites operating under exemptions in LB Sutton*

Type of exemption	No. of sites operating under this exemption	Total capacity (tpa)
T11	1	500

Source: EA Register of waste exemptions

### 5.6.4 Capacity Gap Conclusions

5.6.4.1 Table 34 shows that taking into consideration the management capacity within LB Sutton which meets the apportionment criteria there will more capacity than required to meet the apportionment targets, up until 2036. The surplus decreases from ~171,700 tpa to ~139,100 tpa due to increasing apportionment target, and the assumed loss of the Viridor Recycling and Composting Centre.

5.6.4.2 However, with the additional potential capacity, the surplus could be as much as ~509,800 tpa by 2036.

*Table 34: Apportionment capacity, targets and calculated capacity gap for LB Sutton by waste management type (tonnes per annum)*

	2021	2026	2031	2036
Transfer	85,589	63,515	63,515	63,515
Recycling and Reuse	20,625	20,625	20,625	20,625
Energy from Waste	275,000	275,000	275,000	275,000
Exemptions	500	500	500	500
Total Management Capacity	381,714	359,641	359,641	359,641
Apportionment targets	210,000	213,500	217,000	220,500
<b>Capacity gap</b>	<b>-171,714</b>	<b>-146,141</b>	<b>-142,641</b>	<b>-139,141</b>

Source: Anthesis

5.6.4.3 Table 35 shows that there is also a surplus in capacity gap for management of C&D waste. A small surplus of ~27,400 tpa is expected to decrease to ~26,400 tpa due to an anticipated increase in C&D waste.

Table 35: Management capacity for C&amp;D waste, arisings and calculated capacity gap

	2021	2026	2031	2036
Capacity	43,026	43,026	43,026	43,026
C&D waste arisings	15,667	15,864	16,244	16,607
<b>Capacity gap</b>	<b>-27,358</b>	<b>-27,162</b>	<b>-26,781</b>	<b>-26,418</b>

Source: Anthesis

5.6.4.4 Table 36 shows that there is a total surplus capacity of ~199,100 tpa decreasing to ~165,600 tpa in 2036.

Table 36: Summary of capacity gaps for LB Sutton

	2021	2026	2031	2036
Target	225,667	229,364	233,244	237,107
Capacity	424,740	402,666	402,666	402,666
<b>Capacity gap</b>	<b>-199,073</b>	<b>-173,302</b>	<b>-169,422</b>	<b>-165,559</b>
Land requirement (ha) <sup>24</sup>	-3.32	-2.89	-2.82	-2.76

Source: Anthesis

## 5.7 South London Summary

5.7.1.1 The SLWP authorities have agreed to pool their apportionment targets and as such, a summary of total capacity against the aggregated apportionment targets and C&D waste arisings has been presented in Table 37.

5.7.1.2 It shows that based on the existing sites, the capacity gap will increase from ~116,800 tpa in 2021 to ~181,600 tpa, resulting in a land requirement of between 1.95 and 3.03 hectares.

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<sup>24</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.

*Table 37: Apportionment capacity, targets and calculated capacity gap for SLWP (tonnes per annum)*

	2021	2026	2031	2036
Transfer	281,299	259,225	259,225	259,225
Recycling and Reuse	96,809	96,809	96,809	96,809
Composting, AD and Land spread	98,056	98,056	98,056	98,056
Energy from waste	275,000	275,000	275,000	275,000
Exemptions	19,080	19,080	19,080	19,080
<b>Total</b>	<b>770,244</b>	<b>748,170</b>	<b>748,170</b>	<b>748,170</b>
Apportionment	887,000	901,250	915,500	929,750
<b>Capacity gap</b>	<b>116,756</b>	<b>153,080</b>	<b>167,330</b>	<b>181,580</b>
Land requirement (ha) <sup>25</sup>	1.95	2.55	2.79	3.03

Source: Anthesis

5.7.1.3 The aggregated C&D capacity gap increases from ~148,400 tpa in 2021 to 168,300 tpa by 2036, requiring 2.80 additional hectares of land (see Table 38).

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<sup>25</sup> Assuming 60,000 tonnes per hectare.

*Table 38: Management capacity for C&D waste, arisings and calculated capacity gap (tonnes per annum)*

	2021	2026	2031	2036
Transfer	213,146	213,146	213,146	213,146
Recycling and Reuse	32,972	32,972	32,972	32,972
<b>Total Capacity</b>	<b>246,118</b>	<b>246,118</b>	<b>246,118</b>	<b>246,118</b>
C&D waste arisings	394,499	399,223	408,315	414,380
<b>Capacity gap</b>	<b>148,381</b>	<b>153,105</b>	<b>162,197</b>	<b>168,262</b>
Land requirement (ha) <sup>26</sup>	2.47	2.55	2.70	2.80

Source: Anthesis

5.7.1.4 Table 39 shows that the overall waste management capacity gap for the SLWP authorities will be ~265,100 tpa by 2021, increasing to 349,800 tpa by 2036. The total additional land requirement is estimated to be 4.42 hectares, increasing to 5.83 hectares by 2036.

*Table 39: Summary of capacity gaps for SLWP (tonnes per annum)*

	2021	2026	2031	2036
Target	1,281,499	1,300,473	1,323,815	1,344,130
Capacity	1,016,362	994,288	994,288	994,288
<b>Capacity gap</b>	<b>265,137</b>	<b>306,185</b>	<b>329,527</b>	<b>349,842</b>
Land requirement (ha) <sup>27</sup>	4.42	5.10	5.49	5.83

Source: Anthesis

<sup>26</sup> Assuming 60,000 tonnes per hectare.

<sup>27</sup> Assuming 60,000 tonnes per hectare. See Appendix 3.



## 6 Sites and Areas

6.1.1.1 An assessment has been completed for each existing waste site in South London. These site profiles can be found in Appendix 4.

6.1.1.2 The waste management need (capacity gap) for South London 2021 - 2036 is summarised in Table 40 below.

*Table 40: Summary of waste capacity gaps in South London 2021-2036 (tonnes and hectares)<sup>28</sup>*

Waste stream	Capacity gap	2021	2026	2031	2036
LACW / C&I	Tonnes of waste	116,756	153,080	167,330	181,580
	Land required (ha)	1.95	2.55	2.79	3.03
C&D	Tonnes of waste	148,381	153,105	162,197	168,262
	Land required (ha)	2.47	2.55	2.70	2.80
Total	Tonnes of waste	265,137	306,185	329,527	349,842
	Land required (ha)	4.42	5.10	5.49	5.83

Source: Anthesis

6.1.1.3 The table shows that by 2036 there will be a total waste management capacity shortfall of just under 350,000 tonnes per annum, comprising around 182,000 tonnes per annum for LACW and C&I waste streams (apportioned waste) and 168,000 for C&D waste streams.

6.1.1.4 The NPPW requires Local Plans to identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the Plan. The London Plan requires boroughs to provide capacity through facilitating the maximum use of existing facilities. Both the NPPW and London Plan direct new waste facilities towards industrial locations.

6.1.1.5 With this in mind, the following sequential approach to identifying capacity and land to meet South London's waste needs was developed:

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<sup>28</sup> Not including Suez facility or other facilities in the planning pipeline.

- 1) Opportunities for intensification of existing waste sites;
- 2) Deliverable individual sites, including pipeline facilities and any identified through a call for sites;
- 3) Areas identified in Schedule 2 of the SLWP; and
- 4) Other industrial land.

6.1.1.6 Locations suitable for waste use under each of these categories are set out below.

## **6.2 Opportunities for intensification of existing waste sites**

There are five sites in South London that are considered to have potential for intensification. These are assessed below.

### **6.2.1 777 Recycling Centre, 154a Beddington Lane, Sutton, CR0 4TE**

6.2.1.1 This site has a current maximum recent throughput of just under 57,000 tonnes per annum, but the operator states they could manage 250,000 tonnes of waste per annum if it were financially viable. Therefore intensification of throughput of around 190,000 tonnes per annum at this facility is possible, although some intervention may be necessary to make this financially viable for the operator. The owner of this site also owns the adjacent site at 156 Beddington Lane (see section 6.3.6). He is interested in releasing 156 Beddington Lane from its safeguarded waste use and can provide compensatory capacity at 154a Beddington Lane.

### **6.2.2 UK and European Construction / Ranns Construction**

6.2.2.1 The current planning status of this site is unclear. The exact size of the site is not known, but it is estimated to be approximately 0.5ha. It has a maximum recent throughput of 804tpa which is well below its potential as a waste management site. There is an opportunity to intensify operations and increase throughput on the site to around 18,000tpa based on a throughput of 60,000 tonnes per hectare.

### **6.2.3 Factory Lane Special Waste Transfer Station**

6.2.3.1 This site is owner occupied by Croydon Borough Council and is in use as a household recycling and reuse centre and waste transfer station operated by Veolia. The site is 1.79ha and lies within a wider industrial area with access from Factory Lane. The SLWP notes that together with Garth Road Civic Amenity Site and Villiers Road, the South London Waste Partnership offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. The SLWP notes that there is potential for one or more of these transfer stations to be developed during the plan period, however

it has not been possible to contact Veolia to confirm any plans for the site. While HRRCs have a low throughput per hectare, the site is large and there may be an opportunity to co-locate other waste uses on the site. It is understood that when Purley Oaks HRRC is redeveloped as a gypsy and traveller site, compensatory capacity will be relocated to this site. However, there are a number of site constraints including flood risk and therefore it is not possible to draw a conclusion at this stage about how much additional capacity the site could achieve to 2036.

#### **6.2.4 Viridor Recycling and Composting Centre, 105 Beddington Lane, Sutton, CR0 4TD**

6.2.4.1 This site is within the Beddington Waste Management Facility along with Viridor's ERF and landfill site. The facility has temporary permission until 2022 as part of a contract with the South London Waste Partnership. The current waste operator (Viridor) has a licence for the site until 2023. Its proximity to the Viridor ERF makes this site potentially suitable for a complementary facility. However, the site is designated as Metropolitan Open Land, Metropolitan Green Chain, and the section 106 agreement for the site means the site will become part of the Wandle Valley Regional Park by 2023. This site is therefore not considered suitable for intensification.

#### **6.2.5 Deadman Confidential, 35 Willow Lane, Merton, CR4 4NA**

6.2.5.1 This is an exempt site within the Willow Lane SIL which sorts and bales paper for recycling. There is no throughput data for the facility. The most recent planning application (08/P2523) was for a metals recycling site stated that the throughput would be 1,500 tonnes per week which is 78,000 tonnes per annum. It is not clear when the current paper baling operation started. There could be an opportunity to intensify throughput on the site with agreement from the operator, but this would need intervention from the London Borough of Merton. The site is in Flood Zone 2 which could affect the type and amount of throughput on the site.

#### **6.2.6 Summary**

6.2.6.1 Of the five existing facilities assessed for the potential for intensification of operations, 777 Recycling and UK and European Construction / Ranns Construction have a good prospect of delivering additional waste management capacity in the short term. This could be in the regional of 190,000 and 18,000 tonnes per annum respectively, For 777 Recycling this uplift would probably on the provision that the safeguarded waste site at 156 Beddington Lane is released for other uses. The Deadman Confidential site is under-performing in capacity terms but would need

greater intervention from the Boroughs to intensify operations and the deliverability of this is as yet unknown.

### 6.3 Deliverable individual sites

6.3.1.1 Four sites safeguarded for waste uses through the SLWP are now vacant. As these are already safeguarded for waste use, it is recommended that these are put forward to meet South London's capacity gap.

#### 6.3.2 Safeguarded waste site 17: Country Waste Recycling Ltd, 79-85 Beddington Lane, Sutton (2.5ha)

6.3.2.1 This site is the subject of an application by Suez (DM2018/01865) for an integrated Resource Recovery Facility with an overall processing capacity of up to 350,000tpa. The facility would provide compensatory capacity for the existing Suez operations at Benedict Wharf in Mitcham. The proposed facility would handle mainly commercial and industrial waste and the primary activity would be the preparation of a refuse derived fuel (RDF).

6.3.2.2 The current Suez transfer facility in Benedict Wharf, Mitcham has a maximum throughput of 275,000 tonnes per annum, of which around 105,000tpa contributes toward "managing" apportioned waste as defined in the London Plan (see Table 27). Merton's Stage 2 Local Plan (October 2018) included a proposed allocation for Benedict Wharf site (Site Mi1) as follows:

6.3.2.3 "Residential with some non-residential uses that are commensurate with a residential setting (for example small workshops, community uses etc.) and deliverable."

6.3.2.4 "Reallocation is dependent on there being no loss of waste management capacity within the South London Waste Plan area. The council will only support reallocation where the waste management capacity and function is moved within the South London Waste Plan area."

6.3.2.5 The proposed new facility at Beddington Lane would include four main waste process operations, comprising:

- Refuse Derived Fuel (RDF) preparation operations (240,000tpa);
- Recyclable bulking operations (25,000tpa);
- Wood bulking and transfer operations (40,000tpa); and
- Waste segregation and transfer operations (45,000tpa).

6.3.2.6 Confirmation has been received from Suez that all capacity meets the criteria for 'managed waste' and can be counted towards apportioned waste capacity with the exception of 45,000 tonnes per annum of 'waste segregation and transfer operations' which is fed into other parts of the

process. The RDF and wood product will not be used in another South London facility so there is no risk of double-counting capacity.

- 6.3.2.7 Off-setting the loss of around 105,000tpa from the closure of the Suez facility at Benedict Wharf in Mitcham, means that if the facility is given permission there could be a maximum net increase of capacity for apportioned waste of around 200,000 tonnes per annum for South London.

### **6.3.3 Brook House 5 Kimpton Road Sutton SM3 9QL**

- 6.3.3.1 This site is the subject of an application by New Yard Services (DM2019/00399) for the demolition of existing office & industrial warehouse to form a new waste recycling centre and office block B2/B8 at 5 Kimpton Road, Sutton. The site is 0.2ha. The application states that the facility will recycle up to 52,000 tonnes of CD&E waste per annum, but realistically this is likely to be lower at around 20,000. The application is currently pending consideration with a decision due by 5th June 2019.

### **6.3.4 Safeguarded waste site 100: European Metal Recycling, Therapia Lane, Sutton (1.04)**

- 6.3.4.1 This site has been vacant for a number of years. It lies within the Beddington industrial estate and is safeguarded for waste uses through the South London Waste Plan and in Sutton's Policies Map. This site was assessed in Sutton's Strategic Housing and Economic Land Availability Assessment (SHELAA) in December 2016 and found to be deliverable for industrial use, however this was not progressed any further due to the safeguarding for waste use. However, there is no mention of the existing waste use safeguarding in the assessment, nor the requirement to provide compensatory capacity if the site is developed for other uses.
- 6.3.4.2 It is recommended that safeguarding for waste use for this site is maintained, in line with London Plan policy, and that it is allocated in the revised SLWP as a site suitable for waste uses. Depending on the type of facility brought forward, this site could provide a capacity of around 60,000 tonnes (based on the equivalent of 60,000 tonnes of throughput per hectare).

### **6.3.5 SafetyKleen site, Coulsden, Unit 6b, Redlands, Coulsdon, Surrey, CR5 2HT**

- 6.3.5.1 Safety Kleen still own this 0.3ha site but are no longer using it as a waste facility. It is a safeguarded waste site and it estimated that the site has the potential to achieve a throughput of around 17,000 tonnes per annum.

### **6.3.6 156 Beddington Lane, 156 Beddington Lane, Croydon, Surrey, CR0 4TE**

- 6.3.6.1 This is a vacant site safeguarded for waste uses with a five year permission for temporary B8 uses. The owner of this site also owns the adjacent site 777 Recycling at 154a Beddington Lane. He is interested in releasing this site from waste uses and providing compensatory capacity at 154a Beddington Lane (see section 6.1 above). As there is no recent waste operation on this site, compensatory capacity should be assumed to be 54,000 tonnes per annum based on a potential throughput of 60,000 tonnes per hectare.
- 6.3.6.2 Of the four deliverable individual sites assessed for the potential for new waste facilities, three of these could deliver additional waste management capacity in the short term. This could be in the regional of 277,000 tonnes per annum. 156 Beddington Lane has a five year temporary permission for other uses and so is unlikely to be redeveloped before February 2023 when the permission expires. In addition, the owner would like to release the site permanently for other uses and provide compensatory capacity at the neighbouring 777 Recycling site.

### **6.3.7 Individual sites identified through Local Plan 'Call for Sites' exercise**

- 6.3.7.1 Croydon 'Call for Sites' took place in spring 2012 and again in spring 2014 as part of the Croydon Local Plan development process. The "Call for Sites" was when the Council asked developers, landowners and other interested parties to send in sites that they wished to see developed or safeguarded to be assessed by the Council. No industrial or waste sites were submitted or proposed.
- 6.3.7.2 Kingston launched a call for sites in autumn 2017 – January 2018 as part of the preparation for the Local Plan. The invitation was extended to all individuals, developers, landowners, agents and other interested parties to submit details of sites within the borough that may be available for redevelopment over the lifetime of the plan. No industrial or waste sites were submitted or proposed.
- 6.3.7.3 Merton undertook a call for sites exercise took place as part of their Local Plan Stage 1 Public Consultation in Oct 2017- Jan 2018. No new waste sites or industrial sites were submitted as part of the Call for Sites.
- 6.3.7.4 Sutton carried out a 'Call for Sites' exercise between January and March 2015 to identify sites within the borough that may have potential for development over the plan period. As part of the Call for Sites, the Council invited landowners, agents or potential developers, to put forward sites for consideration which might have potential for contributing towards Sutton's future needs for housing, employment, retail, education, health, and other uses between 2016-17 and 2031-32.

6.3.7.5 Sites were submitted through the call for sites for industry/employment use, including:

- Land at Jessops Way, Beddington;
- Land west of Beddington Lane / Coomber Way roundabout Beddington; and
- Land west of Beddington Lane.

6.3.7.6 None of these sites were considered developable after assessment.

6.3.7.7 No individual sites were submitted to any of the South London Boroughs for waste uses during the most recent call for sites exercise.

### 6.3.8 Summary of sites to meet capacity gaps

6.3.8.1 Table 41 summarises the opportunities identified by stage 1) and 2) set out above to identify sites to meet the capacity gaps for South London over the plan period. The new capacity at 777 Recycling has been assumed to continue the current split between HIC and CD&E management. Brackets denote potential new capacity if 156 Beddington Lane is safeguarded as a waste site but 777 Recycling is not intensified as these two options are linked (see section 6.2.1).

*Table 41: Opportunities to identify land to meet capacity gaps for SLWP area over the plan period (000 tonnes)*

Opportunity		Type of waste	Location	Potential new capacity (ktpa)			
				2021	2026	2031	2036
Intensify existing site		HIC	Factory Lane Special Waste Transfer Station	Not known			
Intensify existing site		C&D	UK And European Construction / Ranns	18	18	18	18
Either / Or	Intensify existing site	HIC	777 Recycling Centre	70	70	70	70
		C&D		120	120	120	120
		Total		190	190	190	190
	(New facility)	(Any)	(156 Beddington Lane)	(0)	(54)	(54)	(54)
New facility		HIC	Suez, 79-85 Beddington Lane	200	200	200	200

Opportunity	Type of waste	Location	Potential new capacity (ktpa)			
			2021	2026	2031	2036
New facility	Any	SafetyKleen site	17	17	17	17
New facility	Any	Therapia Lane, Sutton	60	60	60	60
New facility	C&D	Brook House 5 Kimpton Road	20	20	20	20
Total			505 (315)	505 (369)	505 (369)	505 (369)

Source: Anthesis

6.3.8.2 Table 42 below compares this potential new capacity with the capacity gap identified in Table 37 above.

*Table 42: Capacity gap & potential new capacity*

	Waste	2021	2026	2031	2036
Capacity gap	HIC	116,756	153,080	167,330	181,580
Potential new capacity	HIC	270,000	270,000	270,000	270,000
Capacity gap	C&D	148,381	153,105	162,197	168,262
Potential new capacity	C&D	158,000	158,000	158,000	158,000
Potential new capacity	Any*	77,000	77,000	77,000	77,000

\* Does not include 156 Beddington Lane as the increase at 777 Recycling is greater and reflected in the HIC figure

Source: Anthesis

6.3.8.3 Table 42 shows that intensification of existing facilities and developing vacant safeguarded waste sites for new facilities provides sufficient opportunities to meet the identified capacity gap for apportioned (HIC) waste in South London to 2036. This would be through intensifying the operation at 777 Recycling and granting permission for the proposed Suez facility at 79-85 Beddington Lane which could contribute 270,000 tonnes of capacity per annum.



- 6.3.8.4 Intensification of existing facilities and developing vacant safeguarded waste sites for new facilities could also provide sufficient opportunities to meet the capacity gap for C&D waste. This would be achieved through granting permission for the CD&E recycling centre at 5 Kimpton Road, intensifying the operation at 777 Recycling and UK And European Construction / Ranns, and developing the vacant site at Therapia Lane for C&D recycling. This could contribute a total of 218,000 tonnes of capacity per annum. The non-operational SafetyKleen site could also potentially contribute towards C&D management, although this site is less suitable for C&D waste management.
- 6.3.8.5 As sufficient opportunities can be identified to meet South London's capacity gap, it is not necessary to identify any areas for new waste facilities. Whether to remove Schedule 2 Areas from each policies map will be a consideration for the South London Boroughs as they prepare a new SLWP.
- 6.3.8.6 In addition, there have been a number of changes to the Schedule 2 Areas identified in the SLWP as suitable for new waste facilities. Section 6.3 sets out these changes.

## 6.4 Areas identified in Schedule 2 of the SLWP

- 6.4.1.1 The SLWP identifies Industrial Areas with Sites Suitable for Waste Facilities in Policy WP4. These are shown in the table below.

*Table 43: Scheduled 2 of the existing SLWP*

Site Name	Borough
Croydon Purley Oaks Highways Depot	Croydon
Purley Way, Lysander Road and Imperial Way Industrial Area	Croydon Sutton
Factory Lane Industrial Estate	Croydon
Croydon Factory Lane (South Side)	Croydon
Chessington Industrial Area	Kingston
Durnsford Road Industrial Area	Merton

Site Name	Borough
Garth Road Industrial Area	Merton
Willow Lane Industrial Area	Merton
Beddington Industrial Area (parts of)	Sutton
Kimpton Industrial Estate, Land north of Minden Road	Sutton
The Wandle Valley Trading Estate (part of)	Sutton

6.4.1.2 Since the publication of the SLWP in 2012 a number of changes have taken place to the locations identified in Schedule 2 as suitable for waste facilities:

- Factory Lane Industrial Estate: 3.33ha of land within this area has been designated for redevelopment (Proposal Sites 430 and 946). Therefore the area suitable for waste facilities will reduce in size.
- Purley Oaks Highways Depot has been allocated as a Gypsy and Traveller site. Therefore, it is no longer suitable for new waste facilities.
- Durnsford Road Industrial Area has had office buildings converted to residential accommodation under Prior Approval (Vantage House, Weir Road). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of the south of the area for new waste uses. Durnsford Road industrial estate was identified in the Cross Rail 2 consultation in 2015 as the “proposed site for stabling, depot, shaft and tunnelling works”, however Cross Rail 2 works are likely to begin beyond the plan period for the new SLWP.
- Garth Road Industrial Area has had office buildings converted to residential accommodation under Prior Approval (Enterprise House). The Area is now subject to an Article 4 direction which has removed the permitted development rights., however the residential accommodation already within the Area will affect the suitability of parts of the Area for waste uses.
- Willow Lane Industrial Area has had office buildings converted to residential accommodation under Prior Approval (Connect House). The Area is now subject to an Article 4 direction which has

removed the permitted development rights, however the residential accommodation already in the middle of the Area will affect the suitability of parts of the Area for waste uses. Willow Lane is a Business Improvement District and is currently subject to a BID vote.

- Wandle Valley Trading Estate has been redeveloped for other uses and it is an integral part of the Wandle Valley Trail. Therefore, it is no longer suitable for new waste facilities.
- Kimpton Industrial Estate, Land north of Minden Road has been redeveloped for other uses. Therefore, it is no longer suitable for new waste facilities.

## 7 Exports & Imports

### 7.1 Introduction

7.1.1.1 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. The Duty to Co-operate came into effect in November 2011 through the Localism Act. The duty to co-operate requires the South London Boroughs to “to engage, constructively, actively and on an on-going basis” with prescribed public bodies<sup>29</sup> in the preparation of development plan documents “so far as relating to a strategic matter”. The National Planning Policy Framework (NPPF) includes making “specific provision for ... waste management”<sup>30</sup> as one of the strategic priority areas. Meeting the requirements of the duty to co-operate is a key part of the plan making process.

7.1.1.2 The London Plan policy is for London as a whole to plan for net self-sufficiency. Net self-sufficiency means managing the equivalent of your waste arisings (including apportionment targets) while recognising that some imports and exports will continue. This is because where waste is actually treated is dependent on market forces and contracts, rather than solely where facilities are located. Net self-sufficiency does not mean South London will deal solely with its own waste because different types

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<sup>29</sup> Prescribed in Regulation 4. of the Town and Country Planning (Local Planning) (England) Regulations

<sup>30</sup> [National Planning Policy Framework](#) (2019) paragraph 20

of waste require different forms of management and facilities often serve a wider than local catchment area in order to be viable.

- 7.1.1.3 Therefore there is recognition that waste moves across authority boundaries and the duty to cooperate is a mechanism for WPAs to engage with each other on waste movements between their areas to establish if there are any planning reasons why these exports and imports cannot continue. Engagement with recipients of South London's waste exports should take place throughout the plan making process and this will need to be demonstrated to the satisfaction of the Inspector when the new SLWP is submitted for examination. The following sections present data that can be used during Duty to Cooperate engagement.
- 7.1.1.4 It should be noted that destinations of waste changes regularly and therefore the list of authorities for engagement should be reviewed regularly through annual monitoring reports. Data from the last five years has been presented in this report.
- 7.1.1.5 For the duty to co-operate it is important to establish the destination of 'significant' movements of waste exports from South London. South London's waste exports which leave London are mostly received in the wider south east (WSE) region. It is therefore appropriate to use the wider south east (WSE) thresholds to indicate 'significant' waste movements. These thresholds were agreed at the South East Waste Planning Advisory Group (SEWPAG) meeting of 10th April 2014 and the East of England Waste Technical Advisory Board (EoEWTAB) meeting of meeting of 3rd April 2014. The thresholds are:
- 2,500 tpa non-hazardous waste (LACW and C&I)
  - 5,000 tpa inert waste (CD&E)
  - 100 tpa hazardous waste

## **7.2 Exports from SLWP boroughs**

### **7.2.1 Apportioned Waste**

- 7.2.1.1 In 2017, approximately 310,000 tonnes of apportioned waste was exported from the SLWP area. Table 44 shows the destination WPAs receiving greater than 2,500 tonnes per year of household and C&I waste. These authorities received 96% of the exports of apportioned waste in 2017. This threshold is consistent with those used by other authorities in London and the wider south east.
- 7.2.1.2 Slough WPA received the greatest quantity of waste in 2017, with the majority going to the Lakeside EfW facility. In fact, this facility received

over a third of the SLWP area's exports of apportioned waste in 2017. It has represented a significant proportion of the exports over the last five years, as demonstrated in Table 44. In 2017, approximately 50% of this was LACW, which will now be going to the Beddington ERF.

Table 44: Destinations of SLWP borough's apportioned waste

Recipient WPA	Site	Type of facility	2013	2014	2015	2016	2017
Slough WPA	Colnbrook Landfill Restoration Site	Land Reclamation	-	-	10,720	7,278	794
	Lakeside EfW Facility	Energy Recovery	58,979	19,344	66,824	97,642	107,952
	Other sites	-	30	56	321	274	564
Surrey WPA	Other sites	-	602	824	731	471	2,311
	Redhill Landfill (NEQ) EPR/BU81261Y	Landfill	1,746	1,230	499	34,613	40,520
	West London AD Facility	Composting, AD and Land spread	-	17,158	17,335	-	20,961
Buckinghamshire WPA	Gerrards Cross Landfill	Landfill	762	17,100	14,774	23,193	30,413
	Other sites	-	-	0	-	2	2
	Springfield Farm Landfill	Landfill	-	-	-	-	4,938
Bexley WPA	Crayfords Materials Recycling Facility	Recycling and Reuse	-	7,855	31,980	30,293	20,873
	Other sites	-	-	-	29	-	-
Havering WPA	Other sites	-	29	2	66	102	97
	Rainham M R F	Recycling and Reuse	4,415	4,603	9,037	14,910	18,047
Southwark WPA	Southwark Integrated Waste Management Facility	Other Treatment	4,041	3,945	4,164	8,167	8,350
Hampshire WPA	Budds Farm Wastewater Treatment Works And Sludge Treatment Centre	Composting, AD and Land spread	-	-	-	-	2,559
	Other sites	-	594	242	447	396	587
	Sims Group U K Limited	Recycling and Reuse	-	600	5,725	8,279	3,878
West Sussex WPA	Olus Biomass	Other Treatment	17	246	543	482	5,158
	Other sites	-	295	212	74	1,497	767

Recipient WPA	Site	Type of facility	2013	2014	2015	2016	2017
	Sweeptech Recycling Park	Other Treatment	-	-	-	755	2,638
Lewisham WPA	Hinkcroft Transport Ltd	Transfer	-	-	5,629	-	-
	SELCHP Energy Recovery Facility	Energy Recovery	1,629	1,116	462	203	1,038
	Other sites	-	-	-	-	-	2,046
Solihull WPA	Meriden Quarry	Other Treatment	-	-	288	4,849	6,869
Kent WPA	Other sites	-	1,751	951	178	156	5,596
Bristol City WPA	Other sites	-	1,022	1,494	1,048	0	131
	Units A, B & C Estuary Park	Recycling and Reuse	-	-	-	-	3,571
	Avonmouth Drum Incinerator	Energy Recovery	54	16	-	-	-
Thurrock WPA	Fort Road Biomass Processing Plant	Other Treatment	-	-	-	-	3,365
	Tilbury Green Power	Energy Recovery	-	-	-	-	2,312
	Other sites	-	821	84	71	148	114
<b>Totals</b>			<b>76,785</b>	<b>77,077</b>	<b>170,945</b>	<b>233,709</b>	<b>296,452</b>

Source: Waste Data Interrogator and ORATS database, EA, 2017

## **7.2.2 Construction, Demolition & Excavation waste**

- 7.2.2.1 In 2017, 238,000 tonnes of CD&E waste generated within the SLWP area was exported to other WPAs. Table 45 shows the destination WPAs receiving greater than 5,000 tonnes per year of inert/C&D waste. These authorities represent 92% of the exported inert / C&D waste (for 2017). This threshold is consistent with those used by other authorities in London and the wider south east.
- 7.2.2.2 Surrey WPA receives the greatest proportion of the exported waste (~41% of all exports). A third of the waste received by Surrey goes to Redhill Landfill. This facility has received a fairly consistent high quantity of waste for the last five years (ranging from 58,000 in 2013 to 31,000 in 2017).
- 7.2.2.3 The single facility receiving the most waste is the Willows Materials Recycling Facility in Wandsworth WPA, for recycling and/or reuse, which received 40,000 tonnes in 2017.



Table 45: Destinations of SLWP borough's inert/C&amp;D waste

Recipient WPA	Site	Type of facility	2013	2014	2015	2016	2017
Surrey WPA	Redhill Landfill (NEQ) EPR/BU8126IY	Landfill	58,430	40,173	47,976	39,739	30,960
	Addlestone Quarry	Landfill	-	-	2,810	23,800	11,322
	D & E Roberts, Kingston Rd, Kt22	Transfer	7,601	7,009	6,144	4,452	4,571
	Stanwell 111 Aggregate Recycling Facility	Other Treatment	6,162	4,467	5,100	1,080	8,820
	Ellerton Yard	Other Treatment	-	-	-	7,921	15,680
	Egap Recycling Centre	Transfer	-	2,867	3,376	3,401	4,214
	Land At Cranleigh Brick & Tile Co Ltd	Land Reclamation	-	-	-	-	11,253
	Lomond Equestrian Centre	Land Reclamation	-	-	-	-	6,428
	Other sites	-	35,047	43,447	64,985	15,710	3,752
Greenwich WPA	Other sites	-	-	-	-	6,178	
	Victoria Deep Water Terminal	Other Treatment	41,452	41,110	39,757	45,391	20,932
Wandsworth WPA	The Willows Materials Recycling Facility	Recycling and Reuse	15,137	16,803	18,121	25,888	40,105
West Sussex WPA	Other sites	-	32,001	49,297	9,646	9,557	1,842
Milton Keynes WPA	BLETCHLEY LANDFILL SITE	Landfill	346	568	25,655	23,685	12,557
Brighton and Hove WPA	Other sites	-	-	-	-	134	
	West Hove Golf Club	Land Reclamation	-	-	4,125	37,620	3,344
Havering WPA	Other sites	-	4	-	2	3,425	2,550
	Rainham Landfill EPR/EP3136GK	Landfill	-	-	4,382	10,800	2,350
Buckinghamshire WPA	Calvert Landfill Site	Landfill	-	-	-	-	7,460
	Gerrards Cross Landfill	Landfill	-	330	2,649	108	5,133
	Other sites	-	889	266	-	7	21
Kent WPA	Borough Green Landfill	Landfill	-	2,898	10,136	5,076	3,744

Recipient WPA	Site	Type of facility	2013	2014	2015	2016	2017
	Other sites	-	1,601	753	9,577	429	763
Oxfordshire WPA	Other sites	-	-	6	-	-	-
	SUTTON COURTENAY LANDFILL EPR/BV7001IK	Landfill	77	202	243	2,436	3,856
	Sutton Courtenay Landfill - Phase 3	Landfill	-	-	-	-	5,921
Slough WPA	Horton Brook Quarry	Landfill	-	375	-	150	4,875
	Other sites	-	816	654	640	1,288	800
<b>Total</b>			<b>199,563</b>	<b>211,224</b>	<b>255,324</b>	<b>261,963</b>	<b>219,564</b>

Source: Waste Data Interrogator and ORATS database, EA, 2017

### 7.2.3 Hazardous Waste

- 7.2.3.1 In 2017, 20,200 tonnes of hazardous waste was exported from the SLWP area. Table 46 shows the destinations of WPAs receiving greater than 100 tonnes per year of hazardous waste. These authorities receive over 86% (for 2017) of the total hazardous waste arisings generated within the SLWP area. This threshold is consistent with those used by other authorities in London and the wider south east.
- 7.2.3.2 Kent WPA receives the greatest quantity of hazardous waste from the SLWP area, at 4,000 tonnes, and 20% of overall exports of this type of waste. Hazardous Waste Data Interrogator does not report specific facilities receiving waste, but instead by general waste fate, so it not possible to draw out specific facilities of significance in this analysis. However, given the specialist nature of these facilities, the WPA in which they are located are usually able to identify the key facilities through this information, for the duty to cooperate process.
- 7.2.3.3 The data shows that hazardous waste tends to travel further than other types of wastes, due to the specialist nature and requirements for specialist treatment. It also shows that there are few specific facilities being utilised; rather that waste is being dispersed fairly disparately.

Table 46: Destinations of SLWP borough's hazardous waste

Recipient WPA	Waste fate	Type of waste	2013	2014	2015	2016	2017
Kent	Incineration without energy recovery	Healthcare	465	338	262	436	194
	Landfill	C&D Waste and Asbestos	1,259	1,002	1,214	473	115
	Recovery	Oil and Oil/Water Mixtures	24	92	106	321	349
	Recovery	Municipal and Similar Commercial Wastes	919	712	938	2,159	1,576
	Recovery	Healthcare	-	31	25	539	380
	Transfer	Oil and Oil/Water Mixtures	17	34	271	327	293
	Transfer	Healthcare	182	124	26	136	96
	Treatment	Oil and Oil/Water Mixtures	1,368	991	1,094	1,060	688
	Other	Other	1,060	759	238	519	303
East London Boroughs	Treatment	Oil and Oil/Water Mixtures	238	107	212	130	82
	Recovery	C&D Waste and Asbestos	1,329	436	938	197	1,168
	Other	Other	376	174	203	416	350
Surrey	Landfill	C&D Waste and Asbestos	405	1,136	1,020	843	959
	Treatment	Oil and Oil/Water Mixtures	166	278	171	120	72
	Treatment	C&D Waste and Asbestos	1,302	1,377	1,102	3	1,446
	Other	Other	67	60	102	80	136
Cambs & Peterborough	Landfill	C&D Waste and Asbestos	789	655	81	748	630
	Recovery	C&D Waste and Asbestos	-	-	-	-	194
	Other	Other	396	952	123	145	93
Hammersmith and Fulham	Recovery	Municipal and Similar Commercial Wastes	-	-	-	195	669
Hammersmith and Fulham	Transfer	Municipal and Similar Commercial Wastes	166	614	713	651	195
	Other	Other	0	2	1	0	1

Recipient WPA	Waste fate	Type of waste	2013	2014	2015	2016	2017
Medway	Transfer	Oil and Oil/Water Mixtures	351	285	232	627	703
	Treatment	Healthcare	177	373	314	214	19
	Other	Other	523	531	379	112	97
Windsor and Maidenhead	Transfer	Healthcare	14	19	35	98	152
	Treatment	Healthcare	5	5	141	554	638
	Other	Other	-	-	0	0	0
Telford and Wrekin	Recovery	Municipal and Similar Commercial Wastes	-	-	-	460	751
Derbyshire	Other	Other	1,118	618	824	994	699
Walsall	Other	Other	222	316	336	395	602
East Sussex	Recovery	Municipal and Similar Commercial Wastes	6	8	11	56	473
	Other	Other	5	1	1	6	46
Hertfordshire	Transfer	Oil and Oil/Water Mixtures	167	170	195	97	63
	Treatment	Oil and Oil/Water Mixtures	127	104	115	142	211
	Other	Other	188	118	156	194	218
Nottinghamshire	Recovery	Oil and Oil/Water Mixtures	282	1,167	227	267	323
	Other	Other	111	122	121	112	148
Greenwich	Transfer	Oil and Oil/Water Mixtures	216	259	286	362	343
	Other	Other	216	70	95	70	70
West London Boroughs	Combustion without energy recovery	Healthcare	0	0	0	-	364
	Recovery	Oil and Oil/Water Mixtures	123	71	29	185	158
	Other	Other	290	220	179	187	166
Essex	Transfer	C&D Waste and Asbestos	40	226	243	243	254
	Other	Other	104	200	191	82	49

Recipient WPA	Waste fate	Type of waste	2013	2014	2015	2016	2017
Cheshire West and Chester	Other	Other	157	337	457	336	200
Leicestershire	Other	Other	7	11	33	198	188
Wakefield	Other	Other	249	196	184	100	172
Hampshire	Other	Other	209	433	110	119	153
Bexley	Combustion without energy recovery	Healthcare	203	271	172	138	70
	Other	Other	135	245	126	108	57
Oxfordshire	Other	Other	78	216	159	127	112
Sefton	Other	Other	101	119	191	99	111
Wirral	Combustion without energy recovery	MFSU Paints, Varnish, Adhesive and Inks	-	-	51	0	0
	Other	Other	-	1	254	184	108
Wiltshire	Landfill	C&D Waste and Asbestos	365	655	77	126	76
	Other	Other	70	2	5	3	2
Rotherham	Other	Other	207	192	291	252	54
Sheffield	Other	Other	134	37	18	220	41
Northamptonshire	Landfill	C&D Waste and Asbestos	4	3	236	300	-
	Transfer	C&D Waste and Asbestos	15	684	116	3,056	1
	Other	Other	29	121	104	10	14
<b>Total</b>			<b>16,775</b>	<b>18,281</b>	<b>15,534</b>	<b>20,333</b>	<b>17,898</b>

Source: Hazardous Waste Data Interrogator and ORATS database, EA, 2017

### **7.3 Imports to SLWP boroughs**

#### **7.3.1 Apportioned Waste (LACW and C&I)**

- 7.3.1.1 In 2017, the SLWP area received ~620,000 tonnes of apportioned waste which wasn't identified as being generated within the four boroughs (see Table 47). However only 69,500 tonnes of this was directly attributable to specific WPAs, with the remainder being 'non-codeable', and attributed to wider regions such as London, South East or South London.
- 7.3.1.2 The most utilised site is the Beddington Farmlands landfill, which is only operational until 2023. Benedict Wharf (Mitcham Transfer Station) is also heavily used, having received 197,000 tonnes in 2017. However this site is up for potential reallocation for residential use, subject to the acceptance of planning permission for another site to provide compensatory capacity at Beddington Lane (see section 6.3.2).
- 7.3.1.3 Surrey and Kent WPAs both import approximately 30,000 tonnes per year into the SLWP area, and are therefore the most significant users of SLWP waste facilities external to the four boroughs.

Table 47: LACW and C&amp;I (Apportioned) waste received by SLWP boroughs

Origin WPA	Site	Type of facility	2013	2014	2015	2016	2017
Surrey	Mitcham Transfer Station	Transfer	75,046	48,411	69,438	35,740	21,817
	B Nebbett & Son Limited	Recycling and Reuse	38,400	21,100	-	-	-
	Sam Smith, Peartree Fm, Addington, Cr0	Transfer	5,877	31,405	7,050	610	7,420
	H C L House	Other Treatment	-	-	-	4,444	1,413
	Other sites	-	12,703	3,252	396	146	183
Kent	Sam Smith, Peartree Fm, Addington, Cr0	Transfer	-	-	-	11,050	17,040
	Mitcham Transfer Station	Transfer	-	-	2,245	10,208	8,690
	Mitcham Waste Treatment Centre EPR/JB3737WE	Composting, AD and Land spread	-	-	-	-	2,604
	Other sites	-	2,516	3,033	3,171	1,171	1,295
Essex	Other sites	-	3,700	3,586	3,394	91	98
East Sussex	Mitcham Transfer Station	Transfer	-	-	1,265	631	7,629
	Other sites	-	-	-	-	0	7
West Sussex	Other sites	-	3,830	3,011	735	101	1,338



Origin WPA	Site	Type of facility	2013	2014	2015	2016	2017
WPA not codeable (London)	Mitcham Transfer Station	Transfer	195,722	212,587	137,959	135,173	158,718
	Riverside Bio Limited	Composting, AD and Land spread	12,071	34,109	34,541	21,042	-
	Riverside AD Facility EPR/AB3307LK	Composting, AD and Land spread	-	-	7,360	44,585	46,341
	Mitcham Waste Treatment Centre EPR/JB3737WE	Composting, AD and Land spread	-	-	-	21,179	40,790
	Morden Transfer Station	Transfer	-	300	10,632	14,965	5,009
	Croydon Transfer Station	Transfer	5,979	-	-	2,447	3,035
	H C L House	Other Treatment	-	-	-	1,541	3,132
	Other sites	-	6,450	-	-	472	658
WPA Not Codeable (Not Codeable)	Other sites	-	27,058	-	-	-	-
WPA not codeable (South East)	Beddington Farmlands Landfill Site	Landfill	192,177	217,709	233,097	216,757	229,455
	B Nebbett & Son Limited	Recycling and Reuse	-	-	9,383	56,433	56,857
	64 Northwood Rd, Thornton Heath, Cr7	Transfer	528	2,496	1,735	1,864	675

Origin WPA	Site	Type of facility	2013	2014	2015	2016	2017
	Other sites	-	4,858	26,885	23,760	13,042	-
	B Nebbett & Son Limited	Recycling and Reuse	24,600	36,950	-	-	-
	Raven Recycling	Transfer	565	1,363	1,688	3,276	5,197
	Other sites	-	31,569	7,312	596	528	25
<b>Total</b>			<b>643,647</b>	<b>653,507</b>	<b>548,444</b>	<b>597,496</b>	<b>619,427</b>

Source: Waste Data Interrogator, EA, 2017

### **7.3.2 Construction, Demolition & Excavation Waste**

- 7.3.2.1 In 2017, the SLWP area received 393,000 tonnes of CD&E waste which wasn't identified as being generated within the four boroughs. However, as Table 48 shows, 302,000 tonnes of this was not directly attributable to specific WPAs, with only 91,000 tonnes being attributed.
- 7.3.2.2 Surrey WPA is the most significant authority utilising facilities within the SLWP area, with 43,000 tonnes in 2017. A significant proportion (44% in 2017) of this was sent to the Chessington Equestrian Centre for land reclamation. This is not a permanent waste site.
- 7.3.2.3 Reston Waste Management (Waste Transfer and Recovery Facility) has been consistently used by Wandsworth, Kensington & Chelsea, Hammersmith & Fulham, City of Westminster and Lambeth WPAs over the last five years. In 2017 it received 31,700 tonnes of imported waste from these WPAs.
- 7.3.2.4 Other significant facilities receiving waste were Beddington Farmlands Landfill (79,200 tonnes), Maguire Skips Wandle Way (58,200 tonnes) and Maguire Skips Weir Road (53,300 tonnes), although the originating WPAs were all non-codeable.

Table 48: Inert / C&amp;D waste received by SLWP boroughs

Origin WPA	Site	Type of facility	2013	2014	2015	2016	2017
Surrey	Chessington Equestrian Centre	Land Reclamation	-	11,628	44,285	14,450	18,989
	Henry Woods Waste Management Ltd	Transfer	12,885	15,183	11,658	8,150	9,815
	L M D Waste Management Limited	Transfer	-	-	1,364	1,619	9,914
	Other sites	-	30,514	37,582	9,392	2,611	4,384
City of London	77 Weir Road	Transfer	-	13,681	48,687	40,625	13,309
	Other sites	-	652	818	924	1,079	843
Wandsworth	Other sites	-	-	-	-	128	34
	Waste Transfer And Recovery Facility	Transfer	10,742	10,187	5,136	6,577	10,526
Kensington & Chelsea	Waste Transfer And Recovery Facility	Transfer	6,656	6,822	6,462	6,855	11,551
Hammersmith & Fulham	Waste Transfer And Recovery Facility	Transfer	7,726	7,925	6,401	4,221	2,780
City of Westminster	Waste Transfer And Recovery Facility	Transfer	3,060	5,911	7,925	4,730	3,860
Lambeth	Other sites	-	-	-	-	-	310
	Waste Transfer And Recovery Facility	Transfer	987	4,984	7,760	5,493	3,020
Bromley	Other sites	-	18,007	40	50	246	1,454
Hackney	Other sites	-	7,703	-	-	-	-
WPA not codeable (London)	32 Willow Lane	Transfer	-	-	-	2,018	6,786
	Able Waste Services Ltd	Transfer	-	289	5,280	13,310	4,565
	Day Group Ltd	Transfer	57,611	160,198	145,380	55,810	-
	L M D Waste Management Limited	Transfer	-	-	749	1,945	5,612
	Mitcham Transfer Station	Transfer	29,714	23,743	10,056	7,306	7,427
	Morden Transfer Station	Transfer	-	7,203	19,708	24,985	34,807
	Other sites	-	4,445	10,000	105	3,089	1,343
WPA not codeable (South East)	Beddington Farmlands Landfill Site	Landfill	81,745	110,425	69,040	80,917	79,206

Origin WPA	Site	Type of facility	2013	2014	2015	2016	2017
	Other sites	-	34,659	3,808	3,792	12,417	2,698
WPA not codeable (South London)	George Killoughery Limited ( Mitcham)	Transfer	71,244	37,318	7,767	33,360	32,845
	Maguire Skips	Transfer	17,330	25,369	16,624	29,718	58,150
	Other sites	-	29,927	22,044	32,220	9,029	5,018
	Raven Recycling	Transfer	455	3,298	3,051	6,325	10,027
	Weir Road Waste Transfer Station	Transfer	-	31,770	49,221	45,415	53,313
<b>Total</b>			<b>426,061</b>	<b>550,226</b>	<b>513,035</b>	<b>422,428</b>	<b>392,589</b>

Source: Waste Data Interrogator, EA, 2017

### 7.3.3 Hazardous Waste

7.3.3.1 In 2017, the SLWP area received over 800 tonnes of hazardous waste not originating from within the four boroughs. Around two thirds of this was sent from locations in Surrey WPA. (see Table 49).

7.3.3.2 Although not directly attributable to any specific waste sites within the area, the vast majority (97% in 2017) is going to transfer stations.

*Table 49: Hazardous waste received by SLWP boroughs*

Origin WPA	Waste fate	Type of waste	2013	2014	2015	2016	2017
Surrey	Transfer	Healthcare	-	-	-	190	254
	Transfer	C&D Waste and Asbestos	0	95	34	129	130
	Transfer	Not Otherwise Specified	10	23	28	80	77
	Transfer	Oil and Oil/Water Mixtures	10	15	42	47	47
	Transfer	MFSU Paints, Varnish, Adhesive and Inks	18	17	42	46	9
	Transfer	Packaging, Cloths, Filter Materials	36	20	28	27	17
	Transfer	Other	20	21	6	2	4
	Recovery	Other	20	3	-	-	-
	Rejected	Other	-	-	-	-	20
Bracknell Forest	Transfer	Solvents	84	128	84	61	67
	Transfer	Oil and Oil/Water Mixtures	28	2	29	54	32
	Transfer	Other	0	3	26	10	14
Kent	Transfer	Packaging, Cloths, Filter Materials	46	30	25	28	29
	Transfer	Not Otherwise Specified	17	11	28	42	37
	Transfer	Oil and Oil/Water Mixtures	30	20	10	26	26
	Transfer	Other	68	28	26	37	29
	Rejected	Other	-	-	-	-	5
Hampshire	Transfer	Packaging, Cloths, Filter Materials	13	31	29	17	13
	Transfer	Other	53	69	61	29	24
	Recovery	Other	0	27	-	-	0
<b>Total</b>			<b>455</b>	<b>543</b>	<b>499</b>	<b>825</b>	<b>835</b>

Source: Hazardous Waste Data Interrogator, EA, 2017

## 7.4 Summary

- 7.4.1.1 In total for LACW and C&I (apportioned) waste streams, for 2017, the SLWP area exported 309,700 tonnes but 'received' ~620,000 tonnes of apportioned waste which wasn't identified as being generated within the four boroughs. This would suggest that the SLWP area is a net importer of waste. However, a very large proportion of the imports were non-codeable, and therefore some of this waste is likely to have been generated within the SLWP area boroughs themselves. There is no way of attributing this tonnage to specific WPAs. In addition, 235,000 tonnes of waste received (38% of the total) was received by transfer stations, rather than final destination waste treatment facilities.
- 7.4.1.2 Similarly, 238,000 tonnes of CD&E waste has been exported from the SLWP area to other WPAs. However, again although the figure for imports is higher at 393,000 tonnes, only 91,000 tonnes were attributable to specific WPAs, and the remaining origins are unknown. And 71% of the waste imported (278,300 tonnes) was received by transfer stations, rather than final destination waste treatment facilities.
- 7.4.1.3 For hazardous waste, as the data source is different, there is less uncertainty with regards to origins. In this case, SLWP area exported 20,200 tonnes in 2017, with 20% of this going to Kent. South London received 800 tonnes in 2017, and so is a net exporter of hazardous waste.

## 8 Conclusions and recommendations

### 8.1 Comparison of the capacity gaps and potential new capacity

8.1.1.1 Section 6 of this report summarises the capacity gap for South London 2021 - 2036 and proposes the intensification of existing sites and development of vacant and non-operational sites to meet the capacity gap. Table 50 compares the capacity gaps identified in Section 5 with the potential new capacity identified in Section 6, and calculates the balance of capacity.

8.1.1.2 The figures are based on the assumption that 777 Recycling Centre at 154a Beddington Lane maximises its throughput for HIC waste and that 156 Beddington Lane is released for other uses. It also uses the assumption that Therapia Lane, UK And European Construction / Ranns and the non-operational SatefyKleen site contribute towards CD&E capacity rather than HIC.

Table 50: Summary of waste capacity gaps in South London 2021-2036 (tonnes and hectares)

Waste stream		2021	2026	2031	2036
LACW / C&I	Capacity gap	116,756	153,080	167,330	181,580
	Potential new capacity	270,000	270,000	270,000	270,000
	Balance	+153,244	+116,920	+102,670	+88,420
C&D	Capacity gap	148,381	153,105	162,197	168,262
	Potential new capacity	218,000*	218,000*	218,000*	218,000*
	Balance	<b>+69,619</b>	<b>+64,895</b>	<b>+55,803</b>	<b>+49,738</b>

\* This figure includes intensification of sites already managing CD&E waste, granting permission for the CD&E recycling centre at 5 Kimpton Road, and developing the site at Therapia Lane for CD&E recycling.

Source: Anthesis

8.1.1.3 Table 50 shows that the sites identified for intensification and development in Section 6 represent sufficient opportunity to meet the capacity gaps for LACW, C&I and C&D waste streams. If all potential new capacity identified in section 6 was brought forward there would be a capacity surplus for LACW, C&I and C&D waste streams which decreases



over the plan period but still remains as a surplus. This means there is some flexibility in bringing this capacity forward.

## **8.2 Policy recommendations**

8.2.1.1 The recommended strategy for each waste stream is set out below.

### **8.2.2 LACW and C&I (apportioned waste)**

8.2.2.1 Continue to safeguard existing waste sites including the safeguarding of waste sites not currently identified on borough policies maps.

8.2.2.2 Engage with the operators of sites which have the potential to intensify their operations, namely 777 Recycling in Sutton and Veolia for Factory Lane Waste Transfer Station in Croydon.

8.2.2.3 Identify vacant sites suitable for new waste facilities, namely 156 Beddington Lane (subject to discussions with 777 Recycling), vacant SafetyKleen site and Therapia Lane.

8.2.2.4 The South London Boroughs will need to carry out engagement under the duty to co-operate with waste planning authorities (WPAs) who receive significant amount of LACW and C&I waste exports from South London. These WPAs are identified in Section 7 of this report. For LACW and C&I waste “significant” is generally considered to be over 2,500 tonnes.

### **8.2.3 CD&E waste**

8.2.3.1 Continue to safeguard existing waste sites including the safeguarding of waste sites not currently identified on borough policies maps.

8.2.3.2 Engage with the operators of sites which have the potential to intensify their operations, namely 777 Recycling in Sutton and UK and European Construction / Ranns Construction in Merton.

8.2.3.3 Identify vacant sites suitable for new waste facilities, namely 156 Beddington Lane (subject to discussions with 777 Recycling), vacant SafetyKleen site and Therapia Lane.

8.2.3.4 The South London Boroughs will need to carry out engagement under the duty to co-operate with waste planning authorities (WPAs) who receive significant amount of CD&E waste exports from South London. These WPAs are identified in Section 7 of this report. For CD&E waste “significant” is generally considered to be over 5,000 tonnes.

### **8.2.4 Hazardous waste**

8.2.4.1 Hazardous waste is a subset of the other main waste streams and therefore is included in the modelling for LACW, C&I and CD&E. Planning for hazardous waste facilities can only really be done at a regional and

inter-regional level and the South London Boroughs will need to co-operate with the London Waste Planning Forum and the wider south east on this issue.

- 8.2.4.2 The South London Boroughs will need to carry out engagement under the duty to co-operate with waste planning authorities (WPAs) who receive significant amount of hazardous waste exports from South London. These WPAs are identified in Section 7 of this report. For hazardous waste “significant” is generally considered to be over 100 tonnes.

### **8.2.5 Low Level Radioactive Waste**

- 8.2.5.1 This waste places no requirement on the SLWP solid waste management infrastructure and it is not necessary to provide additional facilities for this waste stream.

### **8.2.6 Agricultural waste**

- 8.2.6.1 Only a very small amount of agricultural waste is generated in South London and it is not considered necessary to provide additional facilities for this waste stream.

### **8.2.7 Waste water**

- 8.2.7.1 Thames Water have informed us that these all have adequate capacity to manage the incoming sewage and there is no need to plan for any new facilities.

South London Waste Planning Authorities

# South London Waste Technical Paper: Appendices

Report prepared by: Hannah Dick & Victoria Manning

Report Approved by: Peter Scholes

Date: 21<sup>st</sup> June 2019

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# South London Waste Technical Paper

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## 1 Inputs & Outputs of Permitted Waste Sites

### 1.1 Croydon

Table 1: Inputs and Outputs of Permitted Waste Sites in LB Croydon

Site Name	Inputs					Outputs						Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2018	Fate	2013	2014	2015	2016	2018		
Croydon Car Spares	241	222	176	157	128	Recovery	163	127	112	114	-	N/A – 100% capacity assumed	N/A - 0
						Unknown	-	-	-	-	76		
New Era Metals	2,240	2,528	2,355	3,041	4,213	Recovery	2,161	2,509	2,355	3,026	4,185	N/A – 100% capacity assumed	N/A - 0
						Transfer	-	-	-	15	21		
						Treatment	-	-	-	5	7		
Fishers Farm HRRC	6,171	5,330	6,572	6,895	6,466	Landfill	1,422	1,532	1,229	1,529	1,643	Average: 66% Maximum: 75%	N/A - 0
						Recovery	3,888	3,799	5,343	5,366	4,823		
						Treatment	861	-	-	-	-		
	7,319	6,661	7,698	9,099	9,028	Landfill	1,323	1,217	1,498	1,588	1,832	Average: 73%	N/A - 0
						Recovery	5,275	5,437	6,200	7,511	7,196		

Site Name	Inputs					Outputs						Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2018	Fate	2013	2014	2015	2016	2018		
Purley Oaks Civic Amenity Site						Transfer	721	-	-	-	-	Maximum: 77%	
						Unknown	-	7	-	-	-		
Curley Skip Hire	2,473	4,563	6,795	8,206	9,294	Transfer	3,381	7,629	8,025	8,155	4,441	N/A - 0	N/A - 0
						Unknown	-	-	-	-	4,657		
Factory Lane Special Waste Transfer Station	13,894	14,589	17,383	19,736	16,614	Landfill	3,090	2,149	3,591	4,662	3,148	Average: 69% Maximum: 79%	Average: 100% Maximum: 100%
						Recovery	9,241	12,441	13,793	15,072	13,368		
						Transfer	1,563	-	-	-	-		
						Treatment	-	-	-	2	94		
Pear tree Farm	23,651	35,305	48,799	59,282	33,360	Transfer	22,089	44,470	49,205	62,895	43,740	N/A - 0	N/A - 0
Able Waste Services	0	0	15,317	32,503	46,463	Recovery	-	511	15,653	31,676	34,746	N/A - 0	Average: 93% Maximum: 100%
						Transfer	-	-	-	-	13,184		

Site Name	Inputs					Fate	Outputs					Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2018		2013	2014	2015	2016	2018		
Day Aggregates Purley Depot	146,701	131,675	179,300	118,650	113,171	Recovery	536	793	483	387	1,474	N/A - 0	N/A - 0
Henry Woods Waste Managemen t	12,885	0	11,658	8,150	9,815	Transfer	12,883	15,432	11,437	7,978	9,781	N/A - 0	N/A - 0

## 1.2 Kingston

Table 2: Inputs and Outputs of Permitted Waste Sites in RB Kingston

Site Name	Inputs					Outputs						Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017	Fate	2013	2014	2015	2016	2017		
Genuine Solutions Group	1,630	682	342	235	317	Incinerator	132	28	25	11	34	N/A – 100% capacity assumed	N/A - 0
						Recovery	585	64	108	107	68		
						Transfer	2	-	-	-	-		
Kingston Civic Amenity Site	13,288	14,363	13,443	13,437	13,401	Landfill	2,102	3,104	3,366	2,858	1,887	Average: 65% Maximum: 80%	N/A - 0
						Recovery	6,645	11,259	10,076	10,579	11,323		
						Transfer	1,947	-	-	-	189		
						Treatment	2,594	-	-	-	2		
Kingston Waste Transfer Station	61,190	68,883	67,484	66,473	68,297	Incinerator	26,042	33,408	35,793	29,445	31,069	Average: 29% Maximum: 37%	N/A - 0
						Landfill	8,561	12,127	8,885	10,327	11,877		
						Recovery	15,424	18,034	22,694	25,241	22,168		
						Transfer	-	-	15	-	-		
						Treatment	8,512	4,199	-	-	-		

Site Name	Inputs					Outputs						Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017	Fate	2013	2014	2015	2016	2017		
Chessington Equestrian Centre	0	0	44,285	14,450	18,989	Incinerator	-	-	-	-	-	N/A - 0	N/A - 0 (all excavation waste)
						Landfill	-	-	-	-	68		
						Recovery	-	34	-	-	-		

### 1.3 Merton

Table 3: Inputs and Outputs of Permitted Waste Sites in LB Merton

Site Name	Inputs					Fate	Outputs					Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		
EMR, Willow Lane	70,100	65,200	10,333	64,375	65,050	Recovery	70,200	64,300	8,814	65,029	65,264	N/A – 100% capacity assumed	N/A - 0
Riverside Bio Limited, Mitcham Waste Treatment Facility	51,715	42,474	43,428	44,481	43,507	Incinerator	59,628	36,990	-	12,908	46,341	N/A – 100% capacity assumed	N/A - 0
						Landfill	-	-	-	137	1,415		
						Recovery	21	10,182	42,870	41,729	572		
						Treatment	14	-	-	-	1		
						Unknown	-	-	6,370	-	-		
Riverside AD Facility	0	0	7,360	44,585	46,341	N/A	N/A	N/A	N/A	N/A	N/A	N/A – 100% capacity assumed	N/A - 0
Garth Road Civic Amenity Site	11,004	11,837	11,516	14,594	11,800	Landfill	1,899	2,745	2,548	3,205	2,716	Average: 68% Maximum: 73%	N/A - 0
						Recovery	7,636	12,323	8,968	11,294	9,082		
						Transfer	1,469	-	-	0	-		

Site Name	Inputs					Outputs						Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017	Fate	2013	2014	2015	2016	2017		
						Treatment					2		
Garth Road Transfer Station	10,603	11,146	8,278	13,628	18,839	Landfill	2,630	1,239	1,030	1,428	1,984	Average: 84% Maximum: 89%	N/A - 0
						Recovery	7,519	9,803	7,217	12,259	15,434		
						Transfer					9		
Benedict Wharf (Mitcham Transfer Station)	301,998	265,610	234,541	190,320	205,945	Incinerator	0	33,233	140,896	35,093	27,361	Average: 41% Maximum: 100%	Average: 35% Maximum: 100%
						Landfill	0	4,745	1,140	-	8,569		
						Recovery	296,222	233,295	4,128	6,751	38,827		
						Transfer	0	15,073	79,612	146,800	139,876		
Morden Transfer Station	33,994	3,643	30,340	39,950	39,817	Recovery	1,132	1,150	-	-	-	N/A - 0	N/A - 0
						Transfer	-	8,109	22,571	42,403	39,994		
						Treatment	30,066	25,624					
						Unknown	2,097	-					
One Waste Clearance					Site was not operational	N/A					Site was not operational	90% assumed (on basis of	90% assumed (on basis of



Site Name	Inputs					Outputs						Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017	Fate	2013	2014	2015	2016	2017		
												discussion with operator)	discussion with operator)
Wandle Waste Management, 24 Willow Lane	0	5	51	62	141	Recovery			2	5		N/A - 0	N/A - 0
						Transfer			4	30	159		
UK and European Construction Ltd, Willow Lane	0	0	688	804	651	Landfill	0	15	870	60	41	N/A - 0	N/A - 0
LMD Waste Management, 32 Willow Lane	30,160	978	No data	19,146	38,738	Landfill	4,236	2,764	No data			N/A - 0	Average: 89% Maximum: 100%
						Recovery	28,675	7,849	No data	18,699	38,357		
						Unknown		853	No data				
N J B Recycling, 77 Weir Road	0	7,045	48,687	43,151	18,654	Recovery	0	11,943	25,316	38,647	15,073	N/A - 0	Average: 61% Maximum: 78%
						Treatment	0	6,403	9,344	4,477	3,180		

Site Name	Inputs					Outputs						Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017	Fate	2013	2014	2015	2016	2017		
B & T @ Work, Abbey Industrial Estate	No data	424	2,455	2,833	3,729	Transfer	0	1,035	2,566	1,788	0	N/A - 0	N/A - 0
						Unknown	0	0	0	1,084	3,817		
George Killoughery Limited ( Mitcham),	71,253	10,745	7,774	33,360	32,853	Landfill	0	0	0	273	1,146	N/A - 0	N/A - 0
						Recovery	0	0	609	15	51		
						Transfer	4,554	1,286	926	974	0		
L M D Waste Management Limited, Yard 7, Wandle Way	0	0	3,692	14,503	24,444	Recovery	0	0	3,593	10,071	23,632	N/A - 0	Average / maximum: 100%
Maguire Skips, Storage Lane Wandle Way	32,275	12,067	16,626	29,718	58,150	Transfer	33,460	37,587	15,655	29,718	14,437	N/A - 0	N/A - 0
						Unknown					43,713		
Reston Waste Management Ltd	55,474	No data	71,595	70,661	65,055	Landfill	16,164	13,732	2,335	2,981	9,349	N/A - 0	Average: 42% Maximum: 65%
						Recovery	37,959	60,160	15,426	16,009	55,547		
						Unknown			54,701	50,632			

Site Name	Inputs					Outputs					Recovery rate (for apportionment waste)	Recovery rate (C&D)	
	2013	2014	2015	2016	2017	Fate	2013	2014	2015	2016			2017
Maguire Skips Limited, Weir Road Waste Transfer Station	0	0	49,221	45,415	53,313	Recovery	0	0	58,883	45,415	13,078	N/A - 0	Average: 80%  Maximum: 100%
						Unknown							

### 1.4 Sutton

Table 4: Inputs and Outputs of Permitted Waste Sites in LB Sutton

Site Name	Inputs					Fate	Outputs					Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		
Beddington Farmlands Landfill Site	273,922	59,175	302,137	297,674	308,661	N/A	N/A	N/A	N/A	N/A	N/A	N/A - 0	N/A - 0
Beddington Farmlands Energy Recovery Facility (ERF)	Site was not operational	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A - 100% capacity assumed	N/A - 0
Viridor Recycling & Composting Centre	99,029	99,959	-	19,529	103,751	Incinerator	33,869	19,011	15,143	17,054	No data	Average: 21% Maximum: 41%	N/A - 0
						Landfill	2,694	2,905	1,859	1,438	No data		
						Recovery	32,279	31,709	52,683	57,408	No data		
						Transfer					No data		
						Treatment	9,151	8,578	236		No data		
						Unknown	186	17,910	17,362		No data		
	56,912	11,635	28,507	28,041	26,846	Incinerator	-	-	-	732	4,426		

Site Name	Inputs					Fate	Outputs					Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		
777 Recycling Centre						Landfill	761	2,703	435	357	325	N/A - 100% capacity assumed	N/A - 100% capacity assumed
						Recovery	54,204	43,653	27,701	14,172	3,321		
						Transfer	-	-		5,616	18,523		
						Treatment	-	14		-			
						Unknown	-			6,541			
Croydon Transfer Station	5,979	641	12,400	9,566	27,799	Recovery	6,179		11,983	19,571	27,099	Average: 80% Maximum: 100%	N/A - 0
						Unknown		607					
Kimpton Park Way HRRC	11,496	13,377	13,052	741	14,799	Landfill	2,565	4,367	4,701	3,189	3,808	Average: 58% Maximum: 70%	N/A - 0
						Recovery	7,002	8,909	8,350	10,723	10,991		
						Transfer	1,931				0		
Raven Recycling	1,020	1,363	4,739	9,601	15,224	Landfill		2,528	4,166	2,576	1,857	Average: 67% Maximum: 100%	Average: 75% Maximum: 100%
						Recovery	836	3,660	3,519	4,504	11,943		

Site Name	Inputs					Fate	Outputs					Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		
Hinton Skips					Site was not operational	N/A	Site was not operational				Site was not operational	90% assumed (on basis of discussion with operator)	90% assumed (on basis of discussion with operator)
Premier Skip Hire					Site was not operational	N/A	Site was not operational				Site was not operational	90% assumed (on basis of discussion with operator)	90% assumed (on basis of discussion with operator)
Hydro Cleansing, HCL House			485	13,912	8,255	Transfer			60	5,135	2,043	N/A - 0	N/A - 0
King Concrete Ltd, 124 Beddington Lane		-	-	-	1,060	N/A					No data	N/A - 0	N/A - 0
			0	9,601	916	Incinerator				103	103	N/A - 0	N/A - 0

Site Name	Inputs					Fate	Outputs					Recovery rate (for apportionment waste)	Recovery rate (C&D)
	2013	2014	2015	2016	2017		2013	2014	2015	2016	2017		
Cannon Hygiene, Mitcham						Landfill				434	529		
						Recovery				2	0		
						Transfer				16	30		
						Treatment				185	255		

## 2 Exemptions

Table 5: Exempt sites relevant to the apportionment in the SLWP area

Permit Holder	Grid Ref	Site Address	Local Authority District	Paragraph No	Exemption type	Assumed annual tonnage
Treasure Box Scrap Ltd	TQ 38645 63053	Goldcrest Youth Centre Goldcrest Way Croydon, CR0 0PL	Croydon	T10	Sorting mixed waste	520
Green Eagle Limited	TQ 31019 63885	Unit F, 12 Imperial Way, Croydon, CR0 4RR	Croydon	T11	Repairing or refurbishing waste electrical and electronic equipment	500
New Era Assets Ltd	TQ 309946 3657	51 Imperial Way, Croydon, Surrey, CR0 4RR	Croydon	T11	Repairing or refurbishing waste electrical and electronic equipment	500
Technimove Ltd	TQ 31059 63862	Technimove House, Spitfire Bus Park, Hawker Road, Croydon, Surrey, CR0 4WD	Croydon	T11	Repairing or refurbishing waste electrical and electronic equipment	500
Zassr Ltd	TQ 34434 68002	Unit 6, Central Place, Portland Road, London, SE25 4PR	Croydon	T11	Repairing or refurbishing waste electrical and electronic equipment	500
Treasure Box Scrap Ltd	TQ 38645 63053	Goldcrest Youth Centre Goldcrest Way Croydon Croydon CR0 0PL	Croydon	T12	Manually treating waste for reuse eg. bric-a-brac, furniture, clothing	60
Croydon Wood Recycling Ltd	TQ 31449 65923	43 Factory Lane Croydon UK CR0 3RL	Croydon	T4	Preparatory treatments, such as, bailing, sorting, shredding (typical capacity given)	5,000



Permit Holder	Grid Ref	Site Address	Local Authority District	Paragraph No	Exemption type	Assumed annual tonnage
Kingston Hospital NHS Trust	TQ 19495 69761	Kingston Hospital Galsworthy Road Kingston upon Thames Surrey KT2 7QB	Kingston	T4	Preparatory treatments, such as, bailing, sorting, shredding (typical capacity given)	5,000
New Leaf Recycling Ltd	TQ 257857 2663	1 Rufus Business Centre, Ravensbury Terrace, London, SW18 4RL	Merton	T11	Repairing or refurbishing waste electrical and electronic equipment	500
Secondbyte Micros Limited	TQ 25414 72675	391 Durnsford Road, London, SW19 8EE	Merton	T11	Repairing or refurbishing waste electrical and electronic equipment	500
It Trader Ltd	TQ 246756 5638	92 Old Fields Road, Sutton, Surrey, SM1 2NU	Sutton	T11	Repairing or refurbishing waste electrical and electronic equipment	500
Deadman Confidential Ltd	TQ 27739 67511	35, Willow lane, Mitcham, CR4 4UH	Merton	T4	Preparatory treatments, such as, bailing, sorting, shredding (typical capacity given)	5,000

Source: Environment Agency, Simple Waste Registrations (Exemptions) in England: End of September 2018

*Table 6: Summary totals for each borough for exempt sites relevant to apportionment*

Borough	Exempt waste throughput
Croydon	7,580
Kingston	5,000
Merton	6,000
Sutton	500
<b>SLWP Total</b>	<b>19,080</b>

### 3 Applied Waste Management Land Take Factors (as t/ha)

#### 3.1 Methodology

- 3.1.1.1 For land take calculations presented in this report, a figure of 60,000 tonnes throughput per hectare has been used. This conversion figure has been based upon a number of data sources and conversion factors used for other adopted waste plans. The rationale behind selecting this estimate is explained in this appendix.
- 3.1.1.2 The NPPG states that Local plans should not generally prescribe waste management technologies to deal with specific waste streams. Rather, the Plan should identify the type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area. Therefore in order to calculate the amount of land needed in South London to meet the identified capacity gap, an average throughput per hectare to encompass a range of technologies must be used. Producing a robust figure for the amount of waste which can be processed on a given area of development land is not straight forward. A number of factors can have a significant impact on this figure, such as the type of waste management facility employed and the type of waste being processed. Similarly the range of technologies used for particular waste management process types can impact on the amount of land required to establish that technology.
- 3.1.1.3 Land take estimates for waste facilities used in the current London Plan were based upon the "Babtie Formula". This formula is reported in "London Waste Apportionment Part A" Jacobs Babtie (2006), as an approximate measure of the potential waste management capacity deliverable per hectare of development land. In this document (para 4.30) it is stated that "following an evaluation of data in "Planning for Waste Management Facilities" an ODPM 2004 research report and data provided by the GLA, Jacobs has determined a factor of 80,000 tonnes per hectare (t/ha) to convert hectares available into potential capacity". Although this figure has been the basis of land take calculations in London for some time, this estimate has been considered by various stakeholders, in particular the Environment Agency, to be an over-estimate. In more recent evidence base studies in London a figure of 60-65,000 t/ha has been used.
- 3.1.1.4 The last SLWP also converted capacity gap to a land take using an average throughput per hectare rate of around 60,000 t/ha. The "South London Waste Plan DPD Evidence Base Study 4: Technical Report" (October 2010) explains the source of this assumption. In paras 3.22 to 3.29 "Typical Footprints for modern waste management facilities" including evidence cited in Table 3.7, a number of data sources were used to produce updated average throughput per hectare for recycling facilities (MRF, IVC, AD, MBT/MHT/MPT) of 59,245 t/ha and average

throughput across all waste facilities (i.e. including gasification, pyrolysis and modern EfW) of 61,951 t/ha.

- 3.1.1.5 Similarly the West London Waste Plan (adopted July 2015), paragraph 4.2.4 states that “to determine what area of land will be required to provide this additional capacity, an average capacity of 65,000 tonnes per annum per hectare was used to calculate the amount based on the range of possible processes and their processing intensity.” This revised figure was based upon “Table 4A.7 - throughput and land take of different types of facilities’ from the London Plan (2008) and further discussions and agreement with the GLA in 2013.” Table 4A.7, using data sourced from the GLA, uses land take per facility type ranging from 15,200 tonnes per hectare for composting facilities to 71,429 t/ha for MBT. The figure used is noted in the Planning Inspectorate examination report (March 2015) without comment.
- 3.1.1.6 It would appear that estimates of land take requirement in the current London Plan, used to calculate the 80ktpa, have not taken into sufficient account:
- The particular land take requirements of waste management facilities in London, where land availability is severely restricted and therefore sites are likely to be more productive in terms of tonnes throughput per hectare than in other parts of the UK;
  - Balancing land take requirements with the proportionate need for dry recycling, organic recycling and residual waste facilities needed to achieve the London Plan targets.
- 3.1.1.7 In an updated review we have addressed both these issues.
- 3.1.1.8 A variety of published data sources were collated and reviewed on specific London based waste management facilities, noting in particular site capacity and area occupied. Data sources included the Environment Agency, various London Borough planning portals and operator websites. In cases where published site sizes were not available, these were estimated using Google Maps.
- 3.1.1.9 A range of tonnage throughput per hectare has been evidenced from existing facilities, as summarised in Table 7.

*Table 7: Land take (as tonnes per hectare) for selected waste management facility types, listing reviewed facilities*

Waste facility Type (t/ha)	High (t/ha)	Low (t/ha)	Facilities Reviewed plus other data sources
Average MRF	63,324	50,567	Smugglers Way, Bywater Bow, Crayford, Edmonton, Southwark, Suez Barking, Holloway Lane
Average EfW	132,945	129,872	Belvedere, Edmonton, SELCHP, Beddington, Lakeside
Average Organic	32,300	16,667	"Planning for Waste Management Facilities" an ODPM 2004, Cookham Road Swanley, Biogen Westwood, Biogen Twinwoods, Riverside Bio (Merton), Biffa Wanlip
Average MBT	96,000	48,489	Shanks Jenkins Lane, Shanks Frog Island, North Manchester, Biffa Brookhurst Wood, NES Avonmouth, new proposed RDF production facility in South London

3.1.1.10 In calculating overall land take requirements, some facility types will be required more than others. For instance, with the focus on increased recycling of both dry recyclates and organic waste, the number of facilities required to achieve London Plan recycling targets may mean more land will be required for these types of facilities compared to that required for residual waste treatment and disposal. Given the Mayor has expressed that London does not require any additional EfW capacity, this has also been removed from the calculation, so as not to overestimate an achievable throughput per hectare. Therefore, rather than take direct averages upon which to base land take factors as has been used in previous studies, two methods of weighting land take requirements to London Plan targets were modelled, as summarised in Table 8 below.

Table 8: Land take requirements based upon achieving London Plan target

t/ha averages applied	Relative Level of Dry Recycling <sup>1</sup>	T/ha Weighted Average <sup>2</sup>	T/ha Total Area Based Average <sup>3</sup>
High	Low DR	63,902	52,031
	High DR	70,107	61,783
Low	Low DR	37,975	29,282
	High DR	44,755	38,305
Average		54,185	45,350

3.1.1.11 This modelling gave a high end land take factor of 55kt per hectare, low end of 45kt/ha.

### 3.2 C&D waste site

3.2.1.1 The above analysis focuses on waste sites which manage household and C&I wastes specifically but does not consider the throughput per hectare of C&D waste management sites. Analysis has been done on throughputs of sites located within the SLWP area (see Table 9), managing specifically C&D waste. The average for this type of site has been calculated to be an average of approximately 100ktph.

<sup>1</sup> Assumed proportions of waste arisings required by each waste management route to achieve London Waste Targets (as % of total waste arising):

Waste Type	DR Scenario	Dry Recycling (range)	Organic Recycling (range)	Residual waste	Residual Waste to MBT	Residual Waste to Incineration
Household	Low DR	30%	35%	35%	15%	20%
C&I	High DR	50%	15%	35%	0%	35%

<sup>2</sup> Weighted Average as t/ha = (%DR x Factor DR)+ (%Org x Factor Org)+ (%Residual x Factor Residual) where % is proportion of total waste required to achieve London Plan Targets, Factor is t/ha average per relevant waste facility type.

<sup>3</sup> Total Area based average as t/ha = Total London Plan tonnage/(ha DR + ha Org + ha Residual) where ha is the area required to accommodate facilities to achieve the relevant London Plan target (i.e. for DR, Org, Residual)

Table 9: C&amp;D waste management sites and calculated land take (as tonnes per hectare)

Operator	Site area (ha)	Capacity applicable for management of C&D waste	T/ha
Able Waste Services Limited	0.45	43,268	6,151
N J B Recycling Limited	0.35	18,030	51,513
Reston Waste Management Ltd	0.28	30,131	107,612
Maguire Skips Limited	0.3	42,856	142,852
		<b>Average</b>	<b>99,532</b>

3.2.1.2 On the basis that SLWP area's capacity gap is on average 51% of the total gap between existing waste management facilities and the estimated need, it is considered that the average land take of C&D waste sites should also be taken into consideration.

3.2.1.3 Taking this ratio into account (i.e. 51% C&D waste, versus 49% household and C&I waste), the overall average throughput has been calculated as 75kt/ha.

### 3.3 Conclusion

3.3.1.1 Based upon the review of available data, land take requirements for household and commercial waste were based upon an average throughput assumption of 50kt/ha, as an average of the two methods of calculation. C&D waste management sites were also considered and an overall average based on the ratio of the specific capacity gap calculated for the SLWP area, is estimated as 75kt/ha.

3.3.1.2 However, a conservative 60kt/ha has been used to estimate land requirements going forward for new waste sites. This is consistent with other land take estimates used in other adopted waste plans and the views of stakeholders such as the GLA and EA.

## **4 Site Profiles**

### **4.1 South London waste sites - Croydon**

Sites profiled:

Able Waste Services

Croydon Car Spares

Curley Skip Hire

Day Aggregates Purley Depot

Factory Lane Special Waste Transfer (HRRC)

Fishers Farm HRRC

Henry Woods Waste Management

New Era Metals


Pear Tree Farm

Purley Oaks Civic Amenity Site

SafetyKleen Coulsden


Stubbs Mead Depot



Site Name	<b>Able Waste Services</b>
Borough	Croydon
Site address	43 Imperial Way, Croydon, Surrey, CR0 4RR,
OS grid reference	TQ 310 635
Site size (ha)	0.45ha
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Able Waste Services Limited
Site owner	LB Croydon
Type of facility	S0803 : HCI Waste TS + treatment
Max throughput	46,463
Licensed capacity	74,999
Permit number	LB3739AQ/V002
Type of waste accepted	C&D
Management type	Transfer
Location and surrounding land uses (existing and proposed)	The site lies within the Imperial Way Industrial Estate which comprises a mix of new and 1970s warehouses, mostly two-storey.


Site Name	<b>Able Waste Services</b>	
<b>Nature and scale of the facility</b>	Two storey office block fronting Imperial Way with modern two double-height storey warehouse to rear.	
<b>Access, congestion and road capacity</b>	Access from Imperial Way. Good access to the strategic road network.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is another waste operator in this area: New Era Metals.	
<b>Planning policy designation</b>	SIL/LSIS	Purley Way SIL
	SLWP	Within Schedule 2 location
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area Locally listed Historic Parks and Garden 250m south
	Land instability	No known issues
	Proximity to environment designations	MOL 250m south and east SINC 250m south Croydon Panorama 250m east
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<u>16/05806/LP</u>   Erection of single storey rear extension   43 Imperial Way Croydon CR0 4RR	

Site Name	<b>Able Waste Services</b>
	<p>Certificate Refused (Lawful Dev. Cert.) 12 Jan 2017</p> <p><u>14/04243/P</u>   Use as waste transfer and recycling station; construction of roof extension and erection of security fence (without compliance with condition 7 - hours of use - attached to planning permission 13/00555/P)   43 Imperial Way, Croydon, CR0 4RR Permission Granted 10 Dec 2014</p> <p><u>13/00455/P</u>   Use as waste transfer and recycling station; construction of roof extension and erection of security fence   43 Imperial Way, Croydon, CR0 4RR Permission Granted 16 Apr 2013</p>
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	<p>This site is not safeguarded in Croydon’s policies map and there is an opportunity to do so through the new SLWP. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.</p>

Site Name	<b>Croydon Car Spares</b>
Borough	Croydon
Site address	111 Aurelia Road, Croydon, Surrey, CR0 3BF,
OS grid reference	TQ 306 673
Site size (ha)	0.05
Location map	
Site operator	Croydon Car Spares Ltd
Site owner	Unknown
Type of facility	A19 : Metal Recycling Site (Vehicle Dismantler)
Max throughput	241
Licensed capacity	572
Permit number	YP3993EA/V002
Type of waste accepted	HIC / Hazardous
Management type	Recycling and Reuse
Location and surrounding land uses (existing and proposed)	The site is located within a mixed use area. The site has residential properties either side and an industrial area / retail park opposite.

<b>Site Name</b>	<b>Croydon Car Spares</b>	
<b>Nature and scale of the facility</b>	Small double-storey interwar workshop.	
<b>Access, congestion and road capacity</b>	Narrow residential street.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are no other waste uses nearby.	
<b>Planning policy designation</b>	SIL/LSIS	Opposite Thornton Road Integrated Industrial Location
	SLWP	No designations
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area Locally Listed Historic Parks & Gardens to rear of property
	Land instability	No known issues
	Proximity to environment designations	MOL and SINC to rear of property
	Town Centre Hierarchy	No
B1a – C3 Article 4 Area	No	

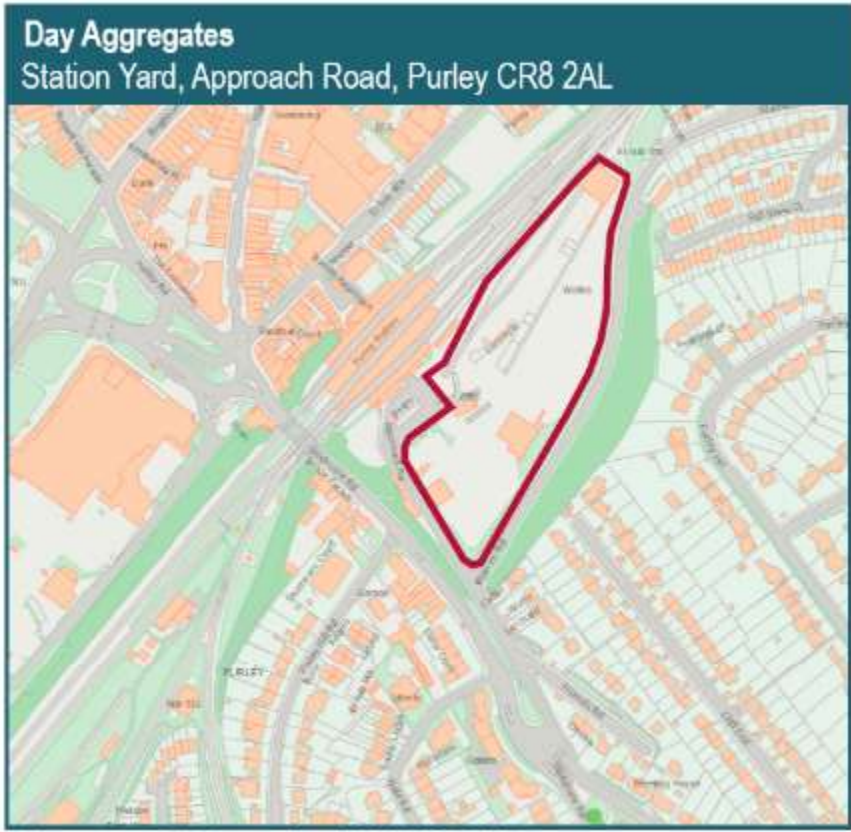
<b>Site Name</b>	<b>Croydon Car Spares</b>
<b>Planning history</b>	<u>92/02337/E</u>   Use as car breakers and for the sale of spare parts   111 Aurelia Road Croydon Status unknown 09 Dec 1992  <u>85/02041/P</u>   Erection of single storey workshop and boundary fence   111 Aurelia Road Croydon Permission Granted 29 Nov 1985
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	This is not a safeguarded waste site. The site is very constrained site and there is no opportunity to expand.

<b>Site Name</b>	<b>Curley Skip Hire</b>
<b>Borough</b>	Croydon
<b>Site address</b>	Land to the rear of 64 Northwood Road, Croydon CR7 8HQ
<b>OS grid reference</b>	TQ 321 693
<b>Site size (ha)</b>	0.07
<b>Location map</b>	 <p>The map shows a residential area with a red outline highlighting the site location. The site is situated behind 64 Northwood Road. The map includes labels for 'Curley Skip Hire Unit 1, 64 Northwood Road, Croydon CR7 8HQ' and '© Crown copyright Licence No. 100019285 (2019)'. Other nearby features include 'Croydon Centre (Eastwood)', 'Wicks', and 'Wicks'.</p>

<b>Site Name</b>	<b>Curley Skip Hire</b>	
Site operator	Mr John Oliver Curley	
Site owner	Not known	
Type of facility	A11: Household, Commercial & Industrial Waste T Stn	
Max throughput	9,294	
Licensed capacity	10,920	
Permit number	YP3293EM/V003	
Type of waste accepted	HIC / C&D	
Management type	Transfer	
Location and surrounding land uses (existing and proposed)	The site lies within a small industrial site located in a predominantly residential area. The units are mainly 2-3 storey inter-war sheds.	
Nature and scale of the facility	The site is mainly open skip storage and hardstanding with some single-storey covered areas for sorting of waste.	
Access, congestion and road capacity	Access is from Northwood Road which is predominantly residential.	
Opportunity to use rail or waste to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There are no other waste sites nearby.	
Planning policy designation	SIL/LSIS	No
	SLWP	No designations
	Opportunity area	No
	Other designations	No
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	No


Site Name	Curley Skip Hire	
	Land instability	No known issues
	Proximity to environment designations	No
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<a href="#">16/01679/P</a>   Use of part of driveway as open storage area   64 Northwood Road, Thornton Heath, CR7 8HQ Permission Granted 08 Jun 2016	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	This is not a safeguarded waste site. The site is adjacent to Proposal Sites 284 for residential use including replacement community facility and 286 for residential use which is currently being redeveloped. The site is therefore not considered suitable for intensification or expansion.	



Site Name	<b>Day Aggregates Purley Depot</b>
Borough	Croydon
Site address	Station Yard, Approach Road, Purley, Surrey, CR8 2AL,
OS grid reference	TQ 316 615
Site size (ha)	2ha
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Day Group Ltd
Site owner	Not known
Type of facility	S0906: Inert and excavation WTS with treatment
Max throughput	179,300
Licensed capacity	249,999
Permit number	CB3630RF/A001
Type of waste accepted	C&D
Management type	Transfer


Site Name	<b>Day Aggregates Purley Depot</b>	
Location and surrounding land uses (existing and proposed)	The site lies adjacent to Purley rail station and is reasonably isolated from nearby residential properties.	
Nature and scale of the facility	Open aggregates sorting, treatment, recycling and storage facility with associated two-storey mid-century office block and enclosed sheds.	
Access, congestion and road capacity	Access via Approach Road which is a no through road serving Purley Station, Day Aggregates and London Concrete.	
Opportunity to use rail or waster to transport waste	Yes: Purley rail aggregate terminal.	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	No other waste uses nearby.	
Planning policy designation	SIL/LSIS	No
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Purley Cross and Russell Hill AQFA
	Greenbelt / MOL	No
	Flood Affected	Flood Zone 2 and 3 50m west
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	No
	Town Centre Hierarchy	District Centre 50m north
	B1a – C3 Article 4 Area	No

<b>Site Name</b>	<b>Day Aggregates Purley Depot</b>
<b>Planning history</b>	<u>03/03681/P   Erection of first floor to provide additional office space and alterations to include main entrance disabled persons access ramp   Day Aggregates, Approach Road, Purley, CR8</u> Permission Granted Tue 13 Apr 2004
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	This site is not safeguarded in Croydon’s policies map and there is an opportunity to do so in the new SLWP. The rail-head makes this site well-suited to its current use. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form.

Site Name	<b>Factory Lane Special Waste Transfer Station (HRRC)</b>
Borough	Croydon
Site address	Factory Lane SWTS, Factory Lane, Croydon CR0 3RL
OS grid reference	TQ 313 660
Site size (ha)	1.79
Location map	 <p><b>Factory Lane Special Waste Transfer Station</b> Factory Lane, Croydon CR0 3RL</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Veolia E S ( U K ) Limited
Site owner	Croydon Borough Council
Type of facility	A11 : Household, Commercial & Industrial Waste T Stn
Max throughput	19,736
Licensed capacity	200,000
Permit number	DB3403GP/T001
Type of waste accepted	HIC
Management type	Transfer
Location and surrounding land	The site is part of a larger industrial area. At present, the site accommodates a household reuse and recycling centre and waste

<b>Site Name</b>	<b>Factory Lane Special Waste Transfer Station (HRRC)</b>	
<b>uses (existing and proposed)</b>	transfer station. Active gas holders lie to the north-west of the site and power lines are overhead.	
<b>Nature and scale of the facility</b>	Large triple-storey building surrounded by hardstanding.	
<b>Access, congestion and road capacity</b>	Access from the site is via Factory Lane to the trunk road network, A235/A236. Access suitable for large vehicles.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are a number of waste facilities in this area. However these facilities are located away from residential neighbourhoods.	
<b>Planning policy designation</b>	SIL/LSIS	Purley Way SIL
	SLWP	Safeguarded waste site Schedule 2 location
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	Whole site is in Flood Zone 2, with Flood Zone 3 to the south east of the site.
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Wandle Park lies to the south-east of the site.
Town Centre Hierarchy	No	

<b>Site Name</b>	<b>Factory Lane Special Waste Transfer Station (HRRC)</b>	
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>Demolition of the existing building; erection of replacement salt barn</u> Ref. No: 18/01650/FUL   Status: Permission Granted</p> <p><u>Replacement of a modular building for office and welfare use</u> Ref. No: 15/04193/P   Status: Permission Granted</p>	
<b>Contact with operator</b>	Yes	
<b>Opportunity to intensify or upgrade operation</b>	<p>This site is identified in the SLWP as anticipated for development during the plan period. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site. It has not been possible to contact the operator Veolia. While HRRCs have a low throughput per hectare, the site is large and there may be an opportunity to co-locate other waste uses on the site. However there are a number of site constraints including flood risk.</p>	

Site Name	<b>Fishers Farm Household reuse and Recovery Centre</b>
Borough	Croydon
Site address	Fishers Farm RRC, North Downs Road, New Addington, Croydon, Surrey, CR0 0LF,
OS grid reference	TQ 380 622
Site size (ha)	0.2
Location map	
Site operator	Veolia E S ( U K ) Limited
Site owner	LB Croydon
Type of facility	A13 : Household Waste Amenity Site
Max throughput	6,895
Licensed capacity	15,125
Permit number	DB3403TZ/T001
Type of waste accepted	HIC

<b>Site Name</b>	<b>Fishers Farm Household reuse and Recovery Centre</b>	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	Located on the edge of the residential settlement adjacent to farmland.	
<b>Nature and scale of the facility</b>	Open local authority household reuse and recycling centre	
<b>Access, congestion and road capacity</b>	Access from North Downs Road	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are no other waste uses nearby.	
<b>Planning policy designation</b>	SIL/LSIS	No
	SLWP	Safeguarded waste site
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area




Site Name	<b>Fishers Farm Household reuse and Recovery Centre</b>	
	Land instability	No known issues
	Proximity to environment designations	MOL and SINC to west of site and 100m north of site
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>06/04860/P</u>   Use as temporary car park and storage of plant and machinery   Fishers Farm Civic Amenity Site, North Downs Road, Croydon, CR0 Permission Granted 07 Feb 2007</p> <p><u>92/02607/P</u>   Use of land as civic amenity and neighbourhood recycling site with associated ground works and landscaping measures; provision of site office; erection of 3m high boundary fencing; alterations to access to north downs road and widening of existing access road   Fishers Farm Depot North Downs Road Croydon Permission Granted 16 Feb 1994</p>	
<b>Contact with operator</b>	Yes	
<b>Opportunity to intensify or upgrade operation</b>	There are no plans to intensify or upgrade operations at this site.	

Site Name	<b>Henry Woods Waste Management</b>
Borough	Croydon
Site address	Land Adj To Unit 9, Mill Lane Trading Est, Croydon, Surrey, CR0 4AA,
OS grid reference	TQ 308 653
Site size (ha)	0.7
Location map	 <p>Henry Woods Waste Management Land next to Unit 9, Mill Lane Trading Estate Croydon CR0 4AA</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Henry Woods Waste Management Ltd
Site owner	Maguire Skips
Type of facility	S0803 : HCI Waste TS + treatment
Max throughput	12,885
Licensed capacity	74,999
Permit number	DB3936AZ/A001
Type of waste accepted	HIC and C&D

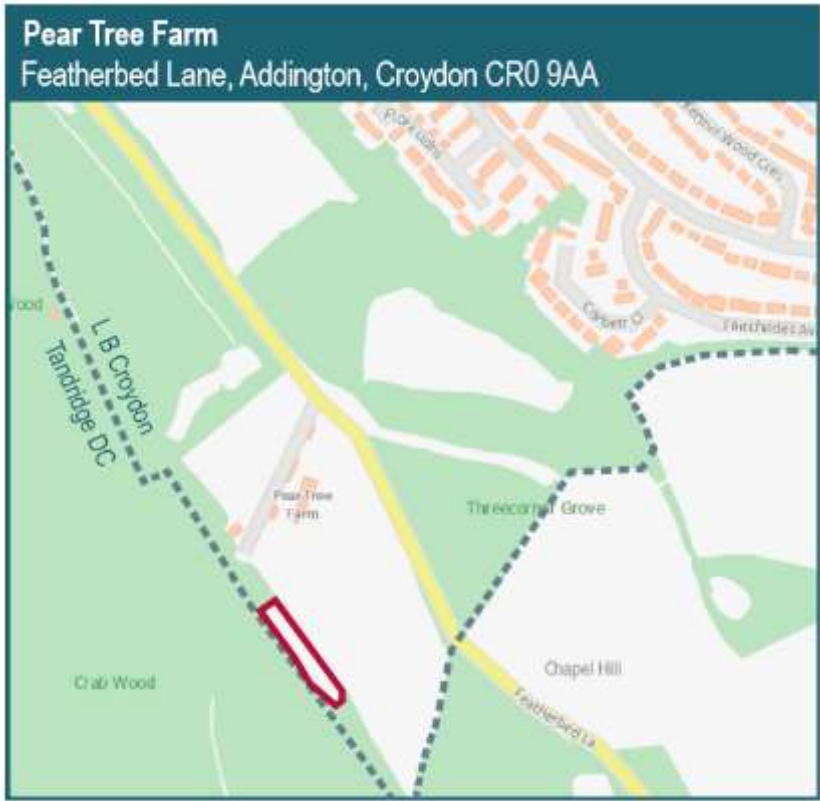
<b>Site Name</b>	<b>Henry Woods Waste Management</b>	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	The site lies within an existing strategic industrial area. Beyond the SIL to the south lies residential housing and a SINC. To the east of the SIL is a proposal site (48) for Mixed use development comprising retail store, commercial space and residential units.	
<b>Nature and scale of the facility</b>	Open skip storage and waste sorting	
<b>Access, congestion and road capacity</b>	Access from Mill Lane within industrial estate	
<b>Opportunity to use rail or water to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are no safeguarded waste sites in Purley Way North and it is not identified as an area suitable for new waste sites in Schedule 2 of the SLWP.	
<b>Planning policy designation</b>	SIL/LSIS	Purley Way SIL
	SLWP	No
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues

Site Name	<b>Henry Woods Waste Management</b>	
	Proximity to environment designations	Other undesignated open space and SINC to south
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning History</b>	<p><a href="#">07/01691/P</a>   Use for the recovery of waste resources involving the placing of moveable storage skips and containers, the use of mobile plant, erection of a canopy tin roof and the laying out of two fixed storage bays   Land Adjacent 9 Mill Lane Trading Estate, Mill Lane, Croydon, CR0 4AA</p> <p>Permission Refused 05 Nov 2007 - Allowed on Appeal 18 June 2008</p>	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	This is a very constrained site, with no opportunity for expansion or intensification.	

Site Name	<b>New Era Metals</b>
Borough	Croydon
Site address	51 Imperial Way, Croydon, Surrey, CR0 4RR,
OS grid reference	TQ 310 637
Site size (ha)	0.37ha
Location map	
Site operator	New Era Assets Limited
Site owner	Croydon Corporation / SAS Waste Ltd
Type of facility	A19 : Metal Recycling Site (Vehicle Dismantler)
Max throughput	4,213
Licensed capacity	4,999
Permit number	GB3104XV/T001
Type of waste accepted	HIC / Hazardous
Management type	Recycling and Reuse
Location and surrounding land uses (existing and proposed)	The site lies within the Imperial Way Industrial Estate which comprises a mix of new and mid-century warehouses, mostly two-storey.

Site Name	<b>New Era Metals</b>	
Nature and scale of the facility	Modern double-storey warehouse with adjacent hardstanding area for metal sorting.	
Access, congestion and road capacity	Access from Imperial Way. Good access to the strategic road network.	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There are two waste operators in this area: Able Waste Services and New Era Metals.	
Planning policy designation	SIL/LSIS	Purley Way SIL
	SLWP	SLWP Schedule 2 location
	Opportunity area	No
	Other designations	Croydon Panorama to south east of site
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	MOL 300m to south east of site
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
	Planning history	<p><u>12/02077/P</u>   Continued use as scrap metal and breakers yard and for recycling; formation of hard surfacing; erection of pre-cast concrete panel barriers; provision of drainage installations   51 Imperial Way, Croydon, CR0 4RR</p> <p>Permission Granted 07 Dec 2012</p>
Contact with operator	No	

<b>Site Name</b>	<b>New Era Metals</b>
<b>Opportunity to intensify or upgrade operation</b>	This is not safeguarded as a waste site in Croydon's policies map and there is an opportunity to do so in the new SLWP. The site is achieving near its permitted capacity so it is unlikely that there is an opportunity to intensify the site in its current form.


<b>Site Name</b>	<b>Pear Tree Farm</b>
<b>Borough</b>	Croydon
<b>Site address</b>	Pear Tree Farm, Featherbed Lane, Addington, Croydon, Surrey, CR0 9AA,
<b>OS grid reference</b>	TQ 383 612
<b>Site size (ha)</b>	0.21
<b>Location map</b>	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
<b>Site operator</b>	Mr Samuel Smith
<b>Site owner</b>	Mr Samuel Smith
<b>Type of facility</b>	A11 : Household, Commercial & Industrial Waste T Stn

<b>Site Name</b>	<b>Pear Tree Farm</b>	
Max throughput	59,282	
Licensed capacity	37,500	
Permit number	YP3793EN/A001	
Type of waste accepted	HIC / C&D	
Management type	Transfer	
Location and surrounding land uses (existing and proposed)	Site is within the green belt surrounded by farmland.	
Nature and scale of the facility	Uncovered sorting facility, skip storage area along with vehicle storage and repair.	
Access, congestion and road capacity	Access from Featherbed Lane	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	No other waste uses nearby.	
Planning policy designation	SIL/LSIS	No
	SLWP	Safeguarded waste site
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	/ MOL	Yes Metropolitan Green Belt
	Flood Affected	No
	Heritage assets	Archaeological Priority Area




Site Name	<b>Pear Tree Farm</b>	
	Land instability	No known issues
	Proximity to environment designations	MGB
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning History</b>	<p><u>Retention of car port</u> Ref. No: 14/03404/P   Status: Permission Refused</p> <p><u>Continued use as waste transfer station, storage and parking of vehicles, repair and servicing of vehicles, storage of scaffolding and storage of skips; construction of soil bund</u> Ref. No: 08/01750/P   Status: Permission Refused</p> <p><u>Continued use as waste transfer station and scaffold storage yard</u> Ref. No: 06/02826/LE   Status: Lawful Development Certificate Refused</p> <p><u>Reduction in height and retention of open fronted shed for storage and servicing of moving equipment vehicle associated with the use of part of the site as a Waste Transfer Station</u> Ref. No: 06/01537/P   Status: Permission Refused</p> <p><u>Reduction in height and retention of open fronted shed for storage and servicing of moving equipment vehicle associated with the use of part of the site as a Waste Transfer Station</u> Ref. No: 05/05364/P   Status: Permission Refused</p> <p><u>Continued use of part of site as scaffold storage yard; reduction in height of existing scaffold storage racks to a maximum height of 3.3 metres relocation of one of the racks</u> Ref. No: 03/03454/P   Status: Permission Refused</p> <p><u>Retention of open fronted shed for storage and servicing of moving equipment vehicle associated with the use of part of the site as a Waste Transfer Station</u> Ref. No: 03/03452/P   Status: Permission Refused</p> <p>81/20/980E: Lawful development certificate was granted on 20th October 1981 for use of part of the land for the dumping</p>	

<b>Site Name</b>	<b>Pear Tree Farm</b>
	and transfer of waste building materials, top soil and manure and for the parking of farm and other commercial vehicles.
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	This site is within the green belt and has been refused permission to intensify operations on several occasions on the basis of harm to the Metropolitan Green Belt and the character and appearance of the area. Therefore this site is not suitable for intensification.

<b>Site Name</b>	<b>Purley Oaks Civic Amenity Site</b>
<b>Borough</b>	Croydon
<b>Site address</b>	Purley Oaks C A Site, Brighton Road, Purley, Surrey, CR8 2BG,
<b>OS grid reference</b>	TQ 321 624
<b>Site size (ha)</b>	0.22
<b>Location map</b>	
<b>Site operator</b>	Veolia E S ( U K ) Limited


<b>Site Name</b>	<b>Purley Oaks Civic Amenity Site</b>	
Site owner	LB Croydon	
Type of facility	A13 : Household Waste Amenity Site	
Max throughput	9,099	
Licensed capacity	12,535	
Permit number	DB3403LU/T001	
Type of waste accepted	HIC	
Management type	Transfer	
Location and surrounding land uses (existing and proposed)	Located within a local centre and surrounding residential neighbourhood. Purley Oaks Depot is adjacent.	
Nature and scale of the facility	Open local authority reuse and recycling centre.	
Access, congestion and road capacity	Access from Brighton Road	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	Adjacent to SLWP Schedule 2 location	
Planning policy designation	SIL/LSIS	No
	SLWP	Safeguarded waste site
	Opportunity area	No
	Other designations	Place Specific Policy Area Adjacent to Proposal Site DM42.3 for Gypsy and Traveller pitches
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No

Site Name	<b>Purley Oaks Civic Amenity Site</b>	
	Flood Affected	The majority of the site falls within Flood Zone 3 with Flood Zone 2 on the periphery
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	None
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><a href="#">14/03850/P</a>   Siting of replacement staff welfare facilities   Purley Oaks Recycling Centre, Brighton Road, Purley, CR8 2BG                      Permission Granted 01 Dec 2014</p>	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	The site is adjacent to proposal Site DM42.3 for Gypsy and Traveller pitches and therefore there is no capacity to expand.	

Site Name	<b>SafetyKleen Coulsden</b>
Borough	Croydon
Site address	Unit 6b, Redlands, Coulsdon, Surrey, CR5 2HT,
OS grid reference	TQ 301 593
Site size (ha)	0.28
Location map	
Site operator	Safety Kleen UK Ltd
Site owner	Safety Kleen UK Ltd
Type of facility	A9 : Haz Waste Transfer Station
Max throughput	Not operational
Licensed capacity	12,782
Permit number	BP3899EU/V005
Type of waste accepted	Hazardous
Management type	Transfer
Location and surrounding land uses (existing and proposed)	The site lies within an industrial area with similar adjacent uses. To the east of the site is residential housing with a buffer of green space and trees.

Site Name	<b>SafetyKleen Coulsden</b>	
Nature and scale of the facility	Large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear.	
Access, congestion and road capacity	Access via Redlands	
Opportunity to use rail or waster to transport waste	Railway lines to the west.	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	No other waste uses nearby	
Planning policy designation	SIL/LSIS	Marlpit Lane SIL
	SLWP	Safeguarded waste site
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	No
	Land instability	No known issues
	Proximity to environment designations	SINC 50m to east
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
Planning history	<p><u>Use for storage of clean kerosene and general waste products</u> Ref. No: 06/00814/LP   Status: Lawful Dev.Cert. Granted (proposed)</p> <p><u>Provision of eight parking spaces at front</u> Ref. No: 97/01879/P   Status: Permission Granted</p>	
Contact with operator	Yes	

Site Name	<b>SafetyKleen Coulsden</b>
Opportunity to intensify or upgrade operation	

Site Name	<b>Stubbs Mead Depot</b>
Borough	Croydon
Site address	Factory Lane, Croydon, CR0 3RL
OS grid reference	Easting 531535 Northing 165822
Site size (ha)	2.71ha
Location map	
Site operator	Veolia E S Cleanaway ( U K ) Ltd
Site owner	LB Croydon
Type of facility	Vehicle depot
Max throughput	N/A
Licensed capacity	N/A

<b>Site Name</b>	<b>Stubbs Mead Depot</b>	
<b>Permit number</b>	CP3491SD/A001	
<b>Type of waste accepted</b>	Depot related to household waste collection	
<b>Management type</b>	N/A	
<b>Location and surrounding land uses (existing and proposed)</b>	The site lies within the Factory Lane industrial area surrounded on three sides by similar uses. To the south lies a locally listed historic park and garden.	
<b>Nature and scale of the facility</b>	Large double-storey shed with hardstanding for vehicles	
<b>Access, congestion and road capacity</b>	Access via Factory Lane.	
<b>Opportunity to use rail or water to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are a number of waste facilities in this area. However these facilities are located away from residential neighbourhoods.	
<b>Planning policy designation</b>	SIL/LSIS	Purley Way SIL
	SLWP	Safeguarded waste site
	Opportunity area	Proposal Site 946: Mixed residential and employment (industry and warehousing)
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA




Site Name	<b>Stubbs Mead Depot</b>	
	Greenbelt / MOL	No
	Flood Affected	The north west corner of the site falls within Flood Zone 3 and the rest of the site is Flood Zone 2.
	Heritage assets	Adjacent to locally listed historic park and garden
	Land instability	No known issues
	Proximity to environment designations	Adjacent to locally listed historic park and garden and SINC
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>Erection of a two storey detached modular building</u> Ref. No: 10/03495/P   Status: Permission Granted</p> <p><u>Extending roof canopy over all of the waste transfer bays</u> Ref. No: 07/04876/P   Status: Permission Granted 01 Feb 2008</p> <p><u>Alterations to existing and construction of recycling storage bays; relocation and replacement of existing lighting/CCTV columns</u> Ref. No: 00/01267/P   Status: Permission Granted (Regulation 3) 20 Sep 2000</p> <p><u>Erection of single storey side extension to existing storage building for use as compost bagging area</u> Ref. No: 94/00380/P   Status: Permission Granted (Regulation 3) 13 Apr 1994</p> <p><u>Installation of 6000 gallon underground petrol storage tank and 12000 gallon underground derv storage tank</u> Ref. No: 89/03206/P   Status: Regulation 4 - Carry out development 21 Feb 1990</p>	
<b>Contact with operator</b>	Yes. Facility is used predominantly as a vehicle depot with a small amount of paper transfer.	
<b>Opportunity to intensify or upgrade operation</b>	Site proposed for mixed residential and employment so no opportunity to intensify. There will be no capacity loss as the facility does not manage waste.	

#### 4.2 South London waste sites - Kingston


Profiled sites:

- Chessington Equestrian centre
- Genuine Solutions Group
- Kingston Civic Amenity Centre
- Kingston Waste Transfer Station

<b>Site Name</b>	<b>Chessington Equestrian Centre</b>
<b>Borough</b>	Kingston Upon Thames
<b>Site address</b>	Chessington Equestrian Centre, Clayton Road, Chessington, Surrey, KT9 1NN,
<b>OS grid reference</b>	TQ 176 652
<b>Site size (ha)</b>	9.88ha
<b>Location map</b>	 <p>Chessington Equestrian Centre Clayton Road, Chessington KT9 1NN</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
<b>Site operator</b>	B L Penwarden Haulage & Demolition Contractors Limited
<b>Site owner</b>	Mark Costello
<b>Type of facility</b>	A25 : Deposit of waste to land as a recovery operation


<b>Site Name</b>	<b>Chessington Equestrian Centre</b>	
Max throughput	44,285	
Licensed capacity	99,999	
Permit number	AB3807FC/A001	
Type of waste accepted	Excavation	
Management type	Land Reclamation	
Location and surrounding land uses (existing and proposed)	The site is located in Green Belt. Chessington Equestrian Centre is adjacent. There are mobile homes and an industrial area to the south of the site.	
Nature and scale of the facility	Open facility	
Access, congestion and road capacity	Access along un-named road from Clayton Road	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There are no other waste uses nearby	
Planning policy designation	SIL/LSIS	No
	Opportunity area	No
	Other designations	No
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	Green Belt
	Flood Affected	No
	Heritage assets	No
	Land instability	No known issues

Site Name	<b>Chessington Equestrian Centre</b>	
	Proximity to environment designations	Green Belt
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p>A permit was granted in 2015 to accept inert excavation waste to land as a recovery operation.</p> <p><u>13/10228</u> Permit with conditions 25/10/2013                      Creation of a new manege area, new drainage &amp; water abatement features &amp; new woodland, grassland and hedgerow habitats</p>	
<b>Contact with operator</b>	No.	
<b>Opportunity to intensify or upgrade operation</b>	<p>The Chessington Equestrian Centre has a permit to accept inert excavation waste to land as a recovery operation. This is not a permanent waste site and therefore no opportunity to intensify uses.</p>	

<b>Site Name</b>	<b>Genuine Solutions Group</b>
<b>Borough</b>	Kingston Upon Thames
<b>Site address</b>	Solutions House, Unit 1 H Q3, 223 Hook Rise South, Surbiton, Surrey, KT6 7LD,
<b>OS grid reference</b>	TQ 191 651
<b>Site size (ha)</b>	0.26
<b>Location map</b>	
<b>Site operator</b>	Genuine Solutions Group Limited
<b>Site owner</b>	Pace Trustees Ltd
<b>Type of facility</b>	S0823 : WEEE treatment facility
<b>Max throughput</b>	1,630 (planning application 5,000)
<b>Licensed capacity</b>	74,999
<b>Permit number</b>	FB3706SS/T001
<b>Type of waste accepted</b>	HIC
<b>Management type</b>	Recycling and Reuse
<b>Location and surrounding land</b>	Located within an industrial area surrounded by similar large industrial sheds. Fronting on Hook Rise South beyond which is

Site Name	<b>Genuine Solutions Group</b>	
uses (existing and proposed)	the Kingston Bypass. Residential properties lie to the east and west of the industrial area. To the North of Kingston bypass is residential properties, Swallow Park Gypsy and Traveller site and to the west of this is school playing fields.	
Nature and scale of the facility	Two-storey office block fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear.	
Access, congestion and road capacity	Access from Hook Rise South	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	No other waste uses nearby.	
Planning policy designation	SIL/LSIS	Chessington Industrial Area (SIL)
	SLWP	Schedule 2 Area
	Opportunity area	No
	Other designations	Neighbourhood Policy SB1 Tolworth Key Area of Change
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	No
	Land instability	No known issues
	Proximity to environment designations	MOL to the east of Chessington SIL Green corridor to the south of the site.
	Town Centre Hierarchy	No


Site Name	<b>Genuine Solutions Group</b>	
	B1a – C3 Article 4 Area	Yes
<b>Planning history</b>	12/10182 Permit with conditions 26/10/2012 Change of Use to Waste Electrical & Electronic Equipment Recycling Facility	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	This type of facility typically has a lower throughput per hectare, so it is unlikely that there is an opportunity to intensify operations at this site in its current form.	

Site Name	<b>Kingston Civic Amenity Centre and Transfer Station</b>
Borough	Kingston Upon Thames
Site address	Chapel Mill Road, Off Villiers Road, Kingston upon Thames, Surrey, KT1 3GZ,
OS grid reference	TQ 190 685
Site size (ha)	2.03 (including Kingston WTS)
Location map	
Site operator	Veolia E S ( U K ) Limited
Site owner	London Borough of Kingston
Type of facility	A13 : Household Waste Amenity Site
Max throughput	14,363
Licensed capacity	25,000
Permit number	DB3403MX/T001
Type of waste accepted	HIC
Management type	Transfer
Location and surrounding land	Site lies within an industrial area which is surrounded by open space. Kingston Waste Transfer Centre is within the same site



<b>Site Name</b>	<b>Kingston Civic Amenity Centre and Transfer Station</b>	
<b>uses (existing and proposed)</b>	and Hogsmill Sewage Treatment Works is located nearby. The site is located away from residential areas.	
<b>Nature and scale of the facility</b>	Enclosed local authority reuse and recycling centre	
<b>Access, congestion and road capacity</b>	Access via Chapel Mill Road. Additions to the Strategic Cycle Network are proposed along the north bank of Hogsmill River away from the site.	
<b>Opportunity to use rail or waster to transport waste</b>	Hogsmill River	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	Kingston Waste Transfer Centre and Hogsmill Sewage Treatment Works is located nearby.	
<b>Planning policy designation</b>	SIL/LSIS	Fairfield Trade Park/Kingsmill Business Park LSIS
	SLWP	Safeguarded Waste Site
	Opportunity area	No
	Other designations	Neighbourhood Policy KT1 Hogsmill Valley Key Area of Change
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Area of Archaeological Significance
	Land instability	No known issues
	Proximity to environment designations	MOL, Green chain and SINC to the north and south of the site

Site Name	<b>Kingston Civic Amenity Centre and Transfer Station</b>	
	Town Centre Hierarchy	Kingston Town
	B1a – C3 Article 4 Area	Yes
<b>Planning history</b>	<p><b><u>13/12160/FUL - Full Application</u></b> Installation of a single storey modular office building (13m x 7m) and retention of a single storey portacabin (10m x 3m) and a single storey modular garage (11m x 8m) involving the temporary change of use from Waste Transfer Station (sui generis) to Grounds Maintenance Depot (sui generis).  <b>Decision:</b> Permit with conditions 10/06/2013</p> <p><b><u>16/12599/FUL - Full Application</u></b> Erection of two waste storage canopy enclosures to replace existing open waste storage bays.  <b>Decision:</b> Permit with conditions 03/08/2016</p> <p><b><u>14/12311/FUL - Full Application</u></b> Installation of 2no. stacked portable cabins to provide staff welfare accommodation.  <b>Decision:</b> Permit with conditions 24/10/2014</p> <p><b><u>09/12104/FUL - Full Application</u></b> Erection of new building to house cardboard and paper recycling and 5 x storage bays (4m high) with associated high steel column and sleeper construction wall with 2m high litter netter on top; minor amendments to existing parking arrangements.  <b>Decision:</b> Permit with conditions 10/08/2009</p> <p><b><u>06/12722/FUL - Full Application</u></b> Installation of first floor extension to existing welfare and site managers office.  <b>Decision:</b> Permit Conditions 22/12/2006</p>	
<b>Contact with operator</b>	Partly	
<b>Opportunity to intensify or upgrade operation</b>	There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site. It has not been possible to contact the operator Veolia.	

Site Name	<b>Kingston Waste Transfer Station</b>
Borough	Kingston Upon Thames
Site address	Kingston Waste Transfer Station, Chapel Mill Road, Off Villiers Road, Kingston upon Thames, Surrey, KT1 3GZ,
OS grid reference	TQ 188 684
Site size (ha)	2.03 (including Kingston RRC)
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Viridor Waste Management Ltd
Site owner	London Borough of Kingston
Type of facility	A11 : Household, Commercial & Industrial Waste T Stn
Max throughput	68,883
Licensed capacity	200,500
Permit number	AB3006FA/V002
Type of waste accepted	HIC
Management type	Transfer


<b>Site Name</b>	<b>Kingston Waste Transfer Station</b>	
<b>Location and surrounding land uses (existing and proposed)</b>	Site lies within an industrial area which is surrounded by open space. Kingston RRC is within the same site and Hogsmill Sewage Treatment Works is located nearby. The site is located away from residential areas.	
<b>Nature and scale of the facility</b>	Double-storey enclosed shed with hardstanding for vehicles.	
<b>Access, congestion and road capacity</b>	Access via Chapel Mill Road	
<b>Opportunity to use rail or waster to transport waste</b>	Hogsmill River	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	Kingston RRC and Hogsmill Sewage Treatment Works is located nearby.	
<b>Planning policy designation</b>	SIL/LSIS	Fairfield Trade Park/Kingsmill Business Park LSIS
	SLWP	Safeguarded Waste Site
	Opportunity area	No
	Other designations	Neighbourhood Policy KT1 Hogsmill Valley Key Area of Change
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Area of Archaeological Significance
	Land instability	No known issues
	Proximity to environment designations	MOL, Green chain and SINC to the north and south of the site
	Town Centre Hierarchy	Kingston Town

Site Name	<b>Kingston Waste Transfer Station</b>	
	B1a – C3 Article 4 Area	Yes
Planning history	<p><b><u>16/12599/FUL - Full Application</u></b> Erection of two waste storage canopy enclosures to replace existing open waste storage bays. <b>Decision:</b> Permit with conditions 03/08/2016</p> <p><b><u>14/12311/FUL - Full Application</u></b> Installation of 2no. stacked portable cabins to provide staff welfare accommodation. <b>Decision:</b> Permit with conditions 24/10/2014</p> <p><b><u>13/12160/FUL - Full Application</u></b> Installation of a single storey modular office building (13m x 7m) and retention of a single storey portacabin (10m x 3m) and a single storey modular garage (11m x 8m) involving the temporary change of use from Waste Transfer Station (sui generis) to Grounds Maintenance Depot (sui generis). <b>Decision:</b> Permit with conditions 10/06/2013</p> <p><b><u>09/12181/FUL - Full Application</u></b> Removal of 3 temporary buildings. Erection of 1 x 2-storey modular building for office/staff use. <b>Decision:</b> Permit with conditions 14/09/2009</p> <p><b><u>09/12104/FUL - Full Application</u></b> Erection of new building to house cardboard and paper recycling and 5 x storage bays (4m high) with associated high steel column and sleeper construction wall with 2m high litter netter on top; minor amendments to existing parking arrangements. <b>Decision:</b> Permit with conditions 10/08/2009</p> <p><b><u>06/12722/FUL - Full Application</u></b> Installation of first floor extension to existing welfare and site managers office. <b>Decision:</b> Permit Conditions 22/12/2006</p>	
Contact with operator	Partly	
Opportunity to intensify or upgrade operation	There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site. It has not been possible to contact the operator Veolia.	

### **4.3 South London waste sites - Merton**

Sites profiled:


B&T @ Work (Penfold Thomas)  
B Nebbett (European Metal Recycling)  
Benedict Wharf Transfer Station (Suez)  
Deadman Confidential  
Garth Road Civic Amenity Site  
Garth Road Transfer Station  
Killoughery  
LMD Waste Management, Wandle Way  
LMD Waste Management, Willow Lane  
Maguire Skips, Wandle Way  
Maguire Skips, Weir Road WTS  
Morden Transfer Station (Suez)  
NJB Recycling  
One Waste Clearance  
Reston Waste Transfer and Recovery  
Riverside AD Facility and Bio Waste Treatment Centre  
UK & European Construction  
Wandle Waste Management

Site Name	<b>B&amp;T @ Work</b>
Borough	Merton
Site address	Unit 5c Wandle Way, Mitcham, Surrey, CR4 4NA,
OS grid reference	TQ 278 677
Site size (ha)	0.06
Location map	 <p><b>B &amp; T @ Work</b> Unit 5c Wandle Way, Willow Lane Industrial Est., Mitcham CR4 4NA</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Penfold Thomas
Site owner	No known
Type of facility	A11 : Household, Commercial & Industrial Waste T Stn
Max throughput	3,729
Licensed capacity	5,000
Permit number	BB3302GA/A001
Type of waste accepted	C&D
Management type	Transfer and materials recycling

Site Name	<b>B&amp;T @ Work</b>	
Location and surrounding land uses (existing and proposed)	Located within an industrial area (Willow Lane Industrial Estate) surrounded by similar two storey sheds. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south of the site.	
Nature and scale of the facility	Open area with skips	
Access, congestion and road capacity	Access via Wandle Way	
Opportunity to use rail or water to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south of the site.	
Planning policy designation	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No

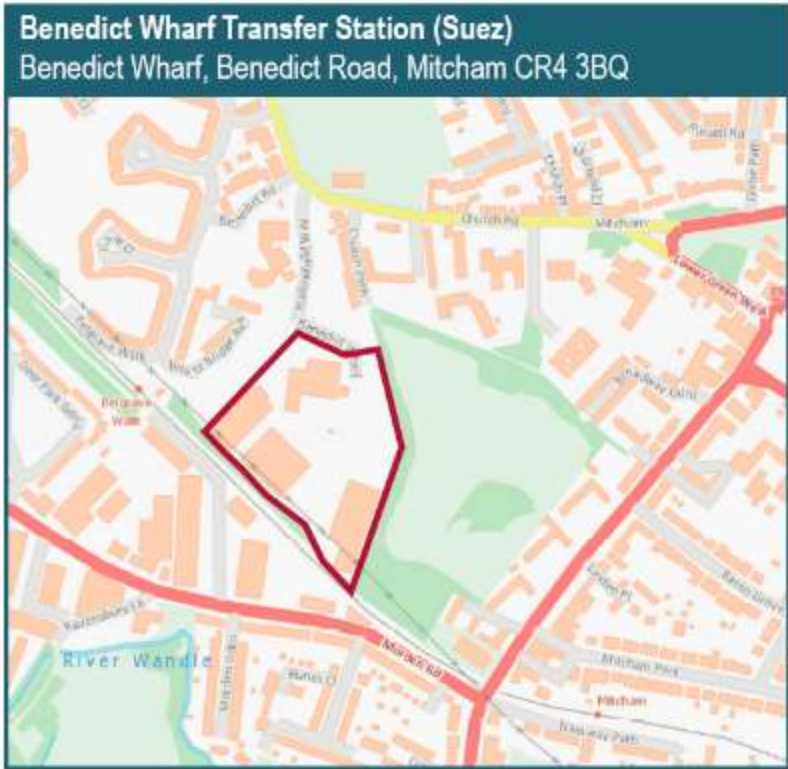


Site Name	<b>B&amp;T @ Work</b>	
	B1a – C3 Article 4 Area	Yes
<b>Planning history</b>	<p><u>13/P3078</u> Grant Renewal of planning permission 18-02-2014 Application for the renewal of an extant planning permission LBM reference 10/P0515 for the erection of a freestanding single storey building in the existing yard for use as a cafe.</p> <p><u>12/P0232</u> Grant Permission 03-04-2013 Application for retrospective change of use of external yard from b2 &amp; b8 to waste recycling</p> <p><u>10/P0515</u> dated 08-10-2010: erection of a freestanding single storey building in the existing yard for use as a café.</p>	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form.	

Site Name	<b>B Nebbett &amp; Son (European Metal Recycling)</b>
Borough	Merton
Site address	B Nebbett & Son, 23 Ellis Road, Willow Lane Ind Estate, Mitcham, Surrey, CR4 4HX,
OS grid reference	TQ 279 672
Site size (ha)	1.03
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	European Metal Recycling Limited
Site owner	B Nebbett & Son (no other land interest declarations signed for permission 07/P3531 (2008))
Type of facility	A20 : Metal Recycling Site (mixed MRS's)
Max throughput	70,100
Licensed capacity	109500
Permit number	DB3608FZ/T001
Type of waste accepted	HIC
Management type	Recycling and Reuse


<b>Site Name</b>	<b>B Nebbett &amp; Son (European Metal Recycling)</b>	
<b>Location and surrounding land uses (existing and proposed)</b>	The site is located within Willow Lane industrial estate surrounded by similar industrial properties. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north west of the site.	
<b>Nature and scale of the facility</b>	A collection of large double-storey warehouses and office space with hardstanding for metal sorting, vehicles and skips.	
<b>Access, congestion and road capacity</b>	Access via Ellis Road, suitable for large vehicles.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north west of the site.	
<b>Planning policy designation</b>	SIL/LSIS	Willow Lane SIL
	SLWP	Safeguarded waste site Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	Safeguarded Land, Industrial Areas Policies CS12, DME1
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	The majority of the site is within Flood Zone 2
	Heritage assets	Archaeological Priority Zone
	Land instability	No known issues

Site Name	<b>B Nebbett &amp; Son (European Metal Recycling)</b>	
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
Planning history	<p><u>07/P3531</u> Permission Granted 11-02-2008 Installation of a 1000 tonne side compression shear on a 198m<sup>2</sup> concrete plinth. extension of existing concrete push wall to 8m around east &amp; south perimeter and development of associated plant area including motor unit, cooling fan, operator platform and cabin.</p> <p><u>07/P0408</u> Permission Granted 20-06-2007 Change of use of land from a plant and vehicle hire depot to provide an extension to existing metal recycling facility (currently operating from adjoining land to the north). proposals include: (a) the installation of a drainage, interceptor and attenuation tanks, (b) the erection of a 4.5m concrete wall around the western, eastern and southern perimeter of the site, (c) the laying of concrete hardstanding and (d) the installation of security lighting including associated lighting columns.</p>	
Contact with operator	No	
Opportunity to intensify or upgrade operation	The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.	

Site Name	<b>Benedict Wharf Transfer Station (Suez)</b>
Borough	Merton
Site address	Benedict Wharf, Benedict Road, Mitcham, Surrey, CR4 3BQ,
OS grid reference	TQ 270 684
Site size (ha)	3.87
Location map	 <p><b>Benedict Wharf Transfer Station (Suez)</b> Benedict Wharf, Benedict Road, Mitcham CR4 3BQ</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Suez Recycling & Recovery South East Ltd
Site owner	Suez Recycling & Recovery
Type of facility	A11 : Household, Commercial & Industrial Waste T Stn
Max throughput	275,000
Licensed capacity	275,000
Permit number	AB3603ZD/V003
Type of waste accepted	HIC / C&D
Management type	Transfer
Location and surrounding land uses	The site lies within an industrial area surrounded by similar industrial uses. Access route into the site is adjacent to a primary school (N). There are neighbouring houses along

<b>Site Name</b>	<b>Benedict Wharf Transfer Station (Suez)</b>	
(existing and proposed)	Church Path (NE), parks on both sides (E&W) and car pound to the north.	
<b>Nature and scale of the facility</b>	Double-storey industrial shed with hard standing and open sorting area.	
<b>Access, congestion and road capacity</b>	Access via Benedict Wharf	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	No other waste uses nearby.	
<b>Planning policy designation</b>	SIL/LSIS	Hallowfield Way (Benedicts Wharf) SIL
	SLWP	Safeguarded waste site
	Opportunity area	No
	Other designations	Industrial Areas Policies CS12/DME
	Air Quality Focus Area	Borough-wide AQMA AQFA – Mitcham London Road A216 (Cricket Green to Streatham Road Junction).
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area (eastern part of site)
	Land instability	No known issues
	Proximity to environment designations	Open space and SINC to the east of the site
Town Centre Hierarchy	N/A	


<b>Site Name</b>	<b>Benedict Wharf Transfer Station (Suez)</b>	
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>08/P2724</u> Grant Permission 29-03-2012</p> <p>Formation of an 'eco park' comprising: an extension to existing materials recycling facility with the provision of new buildings providing a new anaerobic digestion facility; a new office building and visitor/education centre; a waste bulking/transfer facility; a new weighbridge; alteration of the access from Hallowfield Way; new service road and ancillary infrastructure.</p> <p>Conditions discharged: <u>15/P0457</u>, <u>15/P0344</u>, <u>15/P0217</u>, <u>15/P0057</u>, <u>14/P2117</u>, <u>12/P2694</u>, <u>12/P2656</u></p>	
<b>Contact with operator</b>	Yes	
<b>Opportunity to intensify or upgrade operation</b>	<p>Site is proposed for mixed use redevelopment in Merton's draft Local Plan – <u>Site Mi1</u>. Suez plan to sell this site to fund the proposed new facility at Beddington Lane. Therefore there is no opportunity for expansion or intensification.</p>	

Site Name	<b>Deadman Confidential</b>
Borough	Merton
Site address	35 Willow Lane, Mitcham, CR4 4NA
OS grid reference	Easting 527608 Northing 167812
Site size (ha)	0.38
Location map	
Site operator	Deadman Confidential
Site owner	B Nebbett & Sons Ltd
Type of facility	Exempt site
Max throughput	5,000
Licensed capacity	N/A
Permit number	WEX106410 (Exemption)
Type of waste accepted	HIC
Management type	Sorting and baling paper for recycling
Location and surrounding land	The site is located within Willow Lane industrial estate surrounded by similar industrial properties. Connect House,



<b>Site Name</b>	<b>Deadman Confidential</b>	
<b>uses (existing and proposed)</b>	which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.	
<b>Nature and scale of the facility</b>	Hardstanding for material sorting, vehicles and skips. Two storey portakabin office.	
<b>Access, congestion and road capacity</b>	Access via Willow Lane	
<b>Opportunity to use rail or waster to transport waste</b>	None.	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.	
<b>Planning policy designation</b>	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	The site falls within Flood Zone 2
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
<b>Planning history</b>	<u>08/P2523</u> Granted 26-01-2010:	


<b>Site Name</b>	<b>Deadman Confidential</b>
	Change of use from class B2 to class B8, to allow the storage, loading and distribution of metals for recycling, together with the provision of a weighbridge, 2 storey portakabins, container storage, container loader and the erection of new fencing, wall and new access.
<b>Contact with operator</b>	Several attempts to contact this operator but with no success.
<b>Opportunity to intensify or upgrade operation</b>	This is an exempt site with no throughput data and we have not been able to contact the operator to verify throughput. The most recent planning application (08/P2523) was for a metals recycling site stated that the throughput would be 1,500 tonnes per week which is 78,000 tonnes per annum. This application was made by B Nebbett (who is currently operating a metals recycling site at 23 Ellis Road in Merton) and it is not clear when the current operation started. However there could be an opportunity to intensify throughput on the site with some intervention.

Site Name	<b>Garth Road Civic Amenity Site and Transfer Station</b>	
Borough	Merton	
Site address	63-69 Amenity Way, Garth Road, Morden, Surrey, SM4 4AX, SM4 4NJ	
OS grid reference	TQ 234 665	TQ 235 666
Site size (ha)	0.72	
Location map		
Site operator	Veolia E S ( U K ) Limited	
Site owner	London Borough of Merton	
Type of facility	A13 : Household Waste Amenity Site	A9 : Haz Waste Transfer Station
Max throughput	14,594	18,839
Licensed capacity	25,000	22,281
Permit number	DB3403KM/T001	FB3002MJ/T001
Type of waste accepted	LACW	
Management type	Transfer	
Location and surrounding land uses (existing and proposed)	<p>The site is within the Garth Road Industrial Estate. At present, the site accommodates a household reuse and recycling centre and Merton Council's LACW Transfer Station. To the north of the site, there is a waste transfer site, to the east are houses and to the south and west are Merton Council highways depot facilities and industrial units. From the A24 to the south of the site, access is</p>	

<b>Site Name</b>	<b>Garth Road Civic Amenity Site and Transfer Station</b>	
	gained via Garth Road, which has houses and part of the Garth Road Industrial Estate along it.	
<b>Nature and scale of the facility</b>	Open local authority reuse and recycling centre and transfer station	
<b>Access, congestion and road capacity</b>	From the A24 to the south of the site, access is gained via Garth Road, which has houses and part of the Garth Road Industrial Estate along it.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	Suez waste transfer station adjacent. Residential housing at Beaver Close is also adjacent to the site.	
<b>Planning policy designation</b>	SIL/LSIS	Garth Road LSIS
	SLWP	Safeguarded waste site Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	No
	Land instability	No known issues
	Proximity to environment designations	None
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No. Adjacent however.
<b>Planning history</b>	<u>15/P1952</u> Permission granted 03-08-2015	

<b>Site Name</b>	<b>Garth Road Civic Amenity Site and Transfer Station</b>
	<p>Removal of existing metal portacabin and installation of new vandal-proof portable building for use as canteen, office, toilets and drying room for use in connection with existing use of site for waste disposal and recycling.</p> <p><u>14/P3556</u> Permission granted 18-11-2014 Removal of portable buildings and installation of one replacement larger portable building in connection with the existing use of the site for the transfer of waste.</p> <p><u>09/P0507</u> Permission granted 05-05-2009 Erection of an additional single storey building to cover part of open yard for use in connection with the use of the site as a waste transfer station.</p> <p><u>04/P1701</u> Grant Permission 27-04-2005 Provision of industrial units (class b2), incorporating a recycling centre and ancillary office building</p>
<b>Contact with operator</b>	Partly
<b>Opportunity to intensify or upgrade operation</b>	There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site. It has not been possible to contact the operator Veolia.


<b>Site Name</b>	<b>Killoughery</b>
<b>Borough</b>	Merton
<b>Site address</b>	41 Willow Lane, Mitcham, Surrey, CR4 4NA,
<b>OS grid reference</b>	TQ 276 674
<b>Site size (ha)</b>	0.82ha

<b>Site Name</b>	<b>Killoughery</b>
Location map	
Site operator	George Killoughery Limited
Site owner	George Killoughery Limited
Type of facility	A11 : Household, Commercial & Industrial Waste T Stn
Max throughput	71,253
Licensed capacity	74,999
Permit number	EB3633DU/V002
Type of waste accepted	C&D
Management type	Transfer
Location and surrounding land uses (existing and proposed)	The site is located within Willow Lane industrial estate surrounded by similar industrial properties. The River Wandle lies to the west of the site. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.
Nature and scale of the facility	A large site comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste.
Access, congestion and road capacity	Access via Willow Lane.

Site Name	<b>Killoughery</b>	
Opportunity to use rail or water to transport waste	River Wandle nearby but there is not currently infrastructure to support transportation of waste to this site by water.	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.	
Planning policy designation	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	The northern part and the eastern edge of 41 Willow Lane falls within Flood Zone 2.  The northern half of 43a Willow Lane falls within Flood Zone 2.
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
Planning history	41 Willow Lane:	


<b>Site Name</b>	<b>Killoughery</b>
	<p><u>11/P3200</u> Permission Granted 15-06-2012</p> <p>Change of use from a smelter [use class B2] to a waste management facility [sui generis] processing general waste from skips and construction waste with the crushing of materials to manufacture recycled aggregates and the construction of two new buildings towards the rear of the site to house these activities.</p> <p><u>98/P0369</u> Issue Certificate of Lawfulness 24-09-1998</p> <p>Application for a certificate of lawfulness in respect of the use of the site for concrete crushing and the installation of plant associated with the proposed use.</p>
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form.



Site Name	<b>LMD Waste Management, Wandle Way</b>
Borough	Merton
Site address	Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Mitcham, Surrey, CR4 4NA
OS grid reference	TQ 277 677
Site size (ha)	0.06
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	L M D Waste Management Limited
Site owner	Roman Haulage
Type of facility	S0803 : HCI Waste TS + treatment
Max throughput	24,444
Licensed capacity	74,999
Permit number	CB3607SQ/A001
Type of waste accepted	C&D
Management type	Transfer


Site Name	<b>LMD Waste Management, Wandle Way</b>	
Location and surrounding land uses (existing and proposed)	The site is located within Willow Lane industrial estate surrounded by similar industrial properties. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south of the site.	
Nature and scale of the facility	Mainly open hardstanding C&D sorting	
Access, congestion and road capacity	Access from Wandle Way	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south of the site.	
Planning policy designation	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes

Site Name	<b>LMD Waste Management, Wandle Way</b>
<p><b>Planning history</b></p>	<p><u>13/P2719</u> Application refused 23-12-2013:                      Lawful development certificate in respect of the continued existing use of premises for the recycling and storage of secondary aggregate materials including crushing and screening</p> <p>Insufficient evidence was presented that site had been used by Deadman Confidential since 1995 (and then subsequently Roman Haulage) for recycling. No follow-up applications have been submitted. The lawful use of the site remains undefined.</p>
<p><b>Contact with operator</b></p>	<p>No</p>
<p><b>Opportunity to intensify or upgrade operation</b></p>	<p>Given the small scale and lack of permission for waste use for this site it is unlikely that there is an opportunity to intensify the operations.</p>

Site Name	<b>LMD Waste Management, 32 Willow Lane</b>
Borough	Merton
Site address	32 Willow Lane, Mitcham, Surrey, CR4 4NA,
OS grid reference	TQ 277 674
Site size (ha)	0.07
Location map	 <p><b>LMD Waste Management</b> 32 Willow Lane, Willow Lane Industrial Estate, Mitcham CR4 4NA</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	L M D Waste Management Ltd
Site owner	Not known
Type of facility	A14 : Transfer Station taking Non-Biodegradable Wastes
Max throughput	38,738
Licensed capacity	50,000
Permit number	DB3805GC/T001
Type of waste accepted	C&D
Management type	Transfer
Location and surrounding land	The site is located within Willow Lane industrial estate surrounded by similar industrial properties. Connect House, which was

<b>Site Name</b>	<b>LMD Waste Management, 32 Willow Lane</b>	
<b>uses (existing and proposed)</b>	converted to residential use via Prior Approval, lies opposite the site.	
<b>Nature and scale of the facility</b>	Double-storey shed with attached single-storey offices.	
<b>Access, congestion and road capacity</b>	Access via Willow Lane	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies opposite the site.	
<b>Planning policy designation</b>	SIL/LSIS	Willow Lane SIL
	SLWP	Safeguarded waste site Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	The site falls within Flood Zone 2
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes


<b>Site Name</b>	<b>LMD Waste Management, 32 Willow Lane</b>
<b>Planning history</b>	<u>02/P0938</u> Grant Permission 03-04-2003 Redevelopment of site involving erection of single storey building for the use as a waste transfer facility for construction and demolition waste.
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	The proximity to Connect House makes this site unsuitable for intensification. The throughput ratio is above average for this type of facility.

<b>Site Name</b>	<b>Maguire Skips, Wandle Way</b>
<b>Borough</b>	Merton
<b>Site address</b>	Storage Land, Wandle Way, Mitcham, Surrey, CR4 4NB,
<b>OS grid reference</b>	TQ 276 678
<b>Site size (ha)</b>	0.19
<b>Location map</b>	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
<b>Site operator</b>	Maguire Skips Ltd
<b>Site owner</b>	London Borough of Merton

<b>Site Name</b>	<b>Maguire Skips, Wandle Way</b>	
<b>Type of facility</b>	S0810 : Inert & Excavation Waste TS	
<b>Max throughput</b>	58,150	
<b>Licensed capacity</b>	74,999	
<b>Permit number</b>	RP3090VM/A001	
<b>Type of waste accepted</b>	C&D	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	Located within an industrial area (Willow Lane Industrial Estate) surrounded by similar industrial uses.	
<b>Nature and scale of the facility</b>	Mainly open hardstanding for skips and sorting. Double-storey covered area.	
<b>Access, congestion and road capacity</b>	Access via Wandle Way	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Willow Lane Industrial Estate. This facility lies on the edge of the industrial estate near residential properties and has been the subject of noise and planning enforcement investigations.	
<b>Planning policy designation</b>	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues


Site Name	<b>Maguire Skips, Wandle Way</b>	
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
<b>Planning history</b>	10/P3572 Approved 24-01-2011  Application, by Mcguire Skips, for a certificate of lawfulness in respect of the use of land for storage of construction materials and the parking of associated vehicles in connection with that use.	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	The plot throughput ratio is above average for this type of facility so there are unlikely to be opportunities to intensify the throughput.	



Site Name	<b>Maguire Skips, Weir Road</b>
Borough	Merton
Site address	36 Weir Court, Wimbledon, London, SW19 8UG,
OS grid reference	TQ 258 721
Site size (ha)	0.3ha
Location map	
Site operator	Maguire Skips Limited
Site owner	Not known
Type of facility	S0803 : HCI Waste TS + treatment
Max throughput	53,313
Licensed capacity	74,999
Permit number	AB3004UU/A001
Type of waste accepted	C&D
Management type	Transfer
Location and surrounding land	Located within an industrial area comprising two and three storey industrial sheds and warehouses. Vantage House, which was

<b>Site Name</b>	<b>Maguire Skips, Weir Road</b>	
<b>uses (existing and proposed)</b>	converted to residential use via Prior Approval, lies at the southern edge of Durnsford Road SIL.	
<b>Nature and scale of the facility</b>	Enclosed double-storey shed with outside hardstanding space.	
<b>Access, congestion and road capacity</b>	Access via Weir Road to strategic road network.	
<b>Opportunity to use rail or waster to transport waste</b>	River Wandle nearby, but there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks.	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There are three waste transfer facilities within the same industrial estate: Maguire Skips, NJB Recycling and Reston Waste Transfer and Recovery. Vantage House, which was converted to residential use via Prior Approval, lies at the southern edge of Durnsford Road SIL.	
<b>Planning policy designation</b>	SIL/LSIS	Durnsford Rd SIL
	SLWP	Safeguarded waste site Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	Adjacent to Flood Zone 2/3
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Adjacent to River Wandle (SINC, Green Corridor, Open Space & MOL)
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes


<b>Site Name</b>	<b>Maguire Skips, Weir Road</b>
<b>Planning history</b>	<u>13/P1050</u> Grant Permission 29-05-2013 Change of use of the existing public access recycling facility to a use involving the segregation, processing and recovery of waste resources with the erection of a concrete and steel clad building to house a concrete crusher, mobile plant, trommel and walled storage bays.
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

<b>Site Name</b>	<b>Morden Transfer Station (Suez)</b>
<b>Borough</b>	Merton
<b>Site address</b>	Morden Transfer Station, Amenity Way, Morden, Surrey, SM4 4AX,
<b>OS grid reference</b>	TQ 234 666
<b>Site size (ha)</b>	0.8
<b>Location map</b>	

<b>Site Name</b>	<b>Morden Transfer Station (Suez)</b>	
<b>Site operator</b>	Suez Recycling And Recovery U K Ltd	
<b>Site owner</b>	Suez Recycling And Recovery	
<b>Type of facility</b>	A11 : Household, Commercial & Industrial Waste T Stn	
<b>Max throughput</b>	39,950	
<b>Licensed capacity</b>	74,999	
<b>Permit number</b>	CB3639RU/V004	
<b>Type of waste accepted</b>	HIC / C&D	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	The site lies within an industrial location surrounded by similar activities.	
<b>Nature and scale of the facility</b>	Double-storey industrial shed with hardstanding.	
<b>Access, congestion and road capacity</b>	Access from Amenity Way.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a number of waste uses in this area, including Merton Reuse and Recycling Centre. The site is adjacent to residential properties in Beaver Close.	
<b>Planning policy designation</b>	SIL/LSIS	Garth Road LSIS
	SLWP	Safeguarded waste site Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No

Site Name	<b>Morden Transfer Station (Suez)</b>	
	Flood Affected	No
	Heritage assets	No
	Land instability	No known issues
	Proximity to environment designations	'Green Corridor' and a SINC on the north-western boundary. Cemetery designated MOL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
Planning history	04/P1701 approved 27-04-2005 Provision of industrial units (class b2), incorporating a recycling centre and ancillary office building	
Contact with operator	Yes	
Opportunity to intensify or upgrade operation	There are no known plans to intensify operations at the facility.	


Site Name	<b>NJB Recycling</b>
Borough	Merton
Site address	77 Weir Road, London, SW19 8UG,
OS grid reference	TQ 259 726
Site size (ha)	0.35

<b>Site Name</b>	<b>NJB Recycling</b>
<b>Location map</b>	
<b>Site operator</b>	N J B Recycling Limited
<b>Site owner</b>	London Borough of Merton
<b>Type of facility</b>	S0803 : HCI Waste TS + treatment
<b>Max throughput</b>	48,687
<b>Licensed capacity</b>	75,000
<b>Permit number</b>	AB3801TN/A001
<b>Type of waste accepted</b>	C&D
<b>Management type</b>	Transfer
<b>Location and surrounding land uses (existing and proposed)</b>	Located within an industrial area comprising two and three storey industrial sheds and warehouses. The site is adjacent to a Gypsy and Travellers site in Wandsworth.
<b>Nature and scale of the facility</b>	Enclosed triple-storey shed with outside hardstanding space for vehicles.
<b>Access, congestion and road capacity</b>	Access via Weir Road to strategic road network.
<b>Opportunity to use rail or waster to transport waste</b>	River Wandle nearby. Railhead on opposite side of the adjacent rail tracks.
<b>Cumulative impact of existing and proposed waste disposal</b>	There are three waste transfer facilities within the same industrial estate: Maguire Skips, NJB Recycling and

Site Name	<b>NJB Recycling</b>	
facilities on the well-being of the local community	Reston Waste Transfer and Recovery. Vantage House, which was converted to residential use via Prior Approval, lies at the southern edge of Durnsford Road SIL.	
Planning policy designation	SIL/LSIS	Durnsford Rd SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	Adjacent to Flood Zone 2/3
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Adjacent to River Wandle (SINC, Green Corridor, Open Space & MOL
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
Planning history	<p><u>17/P3081</u> Grant Permission 11-01-2018 Erection Of A New 11.0 Metre High Building With Open Frontage</p> <p><u>13/P2545</u> Grant Permission 30-01-2014 Erection of two new open fronted buildings [11 metres high] constructed of steel sheeting, new storage bays [5 metres high], car parking, cycle parking and landscaping in connection with the use of the site for waste recycling and a transfer facility.</p>	
Contact with operator	No	


Site Name	<b>NJB Recycling</b>
<b>Opportunity to intensify or upgrade operation</b>	The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.



Site Name	<b>One Waste Clearance</b>
Borough	Merton
Site address	Unit 2 Abbey Industrial Estate 24 Willow Lane Mitcham CR4 4NA,
OS grid reference	Easting 527785 Northing 167636
Site size (ha)	0.1ha
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	One Waste Clearance
Site owner	Simon Baines
Type of facility	Waste transfer station
Max throughput	20,000
Licensed capacity	75,000
Permit number	Information not yet available
Type of waste accepted	HIC and CD&E
Management type	Transfer and recycling
Location and surrounding land uses (existing and proposed)	The site is located within the Abbey Industrial Estate which forms part of Willow Lane SIL. It is surrounded by other businesses on the industrial estate including waste management facilities, vehicle repairers and manufacturing industries. Connect House, which was


Site Name	<b>One Waste Clearance</b>	
	converted to residential use via Prior Approval, lies to the south of the site.	
Nature and scale of the facility	The facility is a fully enclosed industrial unit.	
Access, congestion and road capacity	The site is accessed from Wandle Way via a purpose-built access and driveway onto the industrial estate.	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House lies nearby which has been converted from offices to residential accommodation through prior approval permitted development.	
Planning policy designation	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes

Site Name	<b>One Waste Clearance</b>
<b>Planning history</b>	<p><u>17/P0212</u> Unit 2 Abbey Industrial Estate 24 Willow Lane Mitcham CR4 4NA</p> <p>Application for change of use from motor vehicle servicing to a non-hazardous waste transfer station</p> <p>Permission granted 23 May 2018</p>
<b>Contact with operator</b>	<p>Yes. The maximum capacity is based on the two weeks of operation. 90% of throughput is recycled with some destined for other sites in South London and the remainder going to Surrey.</p>
<b>Opportunity to intensify or upgrade operation</b>	<p>The throughput per hectare is based on the few weeks the facility has been operating, which is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.</p>

Site Name	<b>Reston Waste Transfer and Recovery</b>
Borough	Merton
Site address	Unit 6, Weir Road, Wimbledon, London, SW19 8UG,
OS grid reference	TQ 259 718
Site size (ha)	0.28ha
Location map	
Site operator	Reston Waste Management Ltd
Site owner	LB Merton / Robert Cooper
Type of facility	S0803 : HCI Waste TS + treatment
Max throughput	71,595
Licensed capacity	74999
Permit number	JB3735RX/V002
Type of waste accepted	C&D
Management type	Transfer
Location and surrounding land	Located within an industrial area comprising two and three storey industrial sheds and warehouses. Vantage House, which

Site Name	<b>Reston Waste Transfer and Recovery</b>	
uses (existing and proposed)	was converted to residential use via Prior Approval, lies opposite the site.	
Nature and scale of the facility	Enclosed triple-storey shed with outside hardstanding space for vehicles.	
Access, congestion and road capacity	Access via Weir Road to strategic road network.	
Opportunity to use rail or waster to transport waste	River Wandle nearby but there is not currently infrastructure to support transportation of waste to this site by water. Railhead on opposite side of the adjacent rail tracks.	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There are three waste transfer facilities within the same industrial estate: Maguire Skips, NJB Recycling and Reston Waste Transfer and Recovery. Vantage House, which was converted to residential use via Prior Approval, lies opposite the site.	
Planning policy designation	SIL/LSIS	Durnsford Rd SIL
	SLWP	Safeguarded waste site Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	Adjacent to Flood Zone 2/3
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Adjacent to River Wandle (SINC, Green Corridor, Open Space & MOL
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes

Site Name	<b>Reston Waste Transfer and Recovery</b>
<b>Planning history</b>	<p><u>12/P1427</u> Grant Permission 27-07-2012 Enlargement to building and reconfiguration of layout (amendment to LBM permission 08/P2235) Conditions: 15/P0540, 13/P3380</p> <p><u>08/P2235</u> Grant Permission 22-07-2011 Redevelopment of existing waste transfer station to form an enclosed waste recycling facility containing a screening machine to reprocess existing waste types plus non hazardous waste, involving demolition of existing buildings and waste sorting area and the erection of enclosed facility with two weighbridges, an office and staff mess.</p>
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.


<b>Site Name</b>	<b>Riverside AD Facility and Bio Waste Treatment Centre</b>	
<b>Borough</b>	Merton	
<b>Site address</b>	43, Willow Lane, Surrey, CR4 4NA,	
<b>OS grid reference</b>	TQ 276 674	
<b>Site size (ha)</b>	0.87ha	
<b>Location map</b>		
<b>Site operator</b>	Riverside AD Limited	
<b>Site owner</b>	Killoughery Properties Ltd	
<b>Type of facility</b>	Other Biological Treatment installation	Composting installation
<b>Max throughput</b>	46,341	51,715
<b>Licensed capacity</b>	999999	100,000
<b>Permit number</b>	AB3307LK/V002	JB3737WE/V003
<b>Type of waste accepted</b>	HIC	
<b>Management type</b>	Composting, AD and Land spread	
<b>Location and surrounding land uses (existing and proposed)</b>	The site is located to south west of Willow Lane and to the rear of buildings at 41A and 43B Willow Lane (which front Willow Lane). The site lies on the western edge of Willow Lane SIL.	

<b>Site Name</b>	<b>Riverside AD Facility and Bio Waste Treatment Centre</b>	
	<p>The Wandle River is located adjacent to the southeast boundary of the site. The land to the north east of the site is designated as Metropolitan Open Land, Open Space, a Green Corridor, a Site of Importance for Nature Conservation and a Conservation Area. The land to the southeast comprises large areas of open space located within the London Borough of Sutton.</p> <p>Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.</p>	
<b>Nature and scale of the facility</b>	The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel.	
<b>Access, congestion and road capacity</b>	An existing access running along the northwest boundary provides vehicle access to the site.	
<b>Opportunity to use rail or waster to transport waste</b>	While the Wandle River is located adjacent to the southeast boundary of the site, infrastructure is not currently in place to use this for transport.	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.	
<b>Planning policy designation</b>	SIL/LSIS	Willow Lane SIL
	SLWP	Safeguarded waste site Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No




Site Name	<b>Riverside AD Facility and Bio Waste Treatment Centre</b>	
	Flood Affected	Part of the eastern and northern of edges of the site falls within Flood Zone 2.
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
<b>Planning history</b>	<p><u>08/P0713</u> Grant Permission 12-03-2009 Riverside House 43A Willow Lane Mitcham Surrey CR4 4NA Change of use from bus depot (sui generis) to a materials recycling facility. [liquid phase in-vessel accelerated composting using food &amp; other organic waste as input material] (class b2)</p> <p>12/P2936 Grant Permission 18-03-2013 Construction of a circular storage tank [7.5 metres high with diameter of 31 metres] for pasteurised food waste in the open yard of this site in connection with the existing use of this site as a food waste recycling facility</p> <p>13/P3797 Grant Permission 02-04-2015 Change of use of the existing consented storage tanks to anaerobically digest residual material from the adjacent consented food waste processing facility to include the installation of a gas engine and ancillary infrastructure to utilise bio-gas for the purpose of generating renewable energy</p> <p>15/P0903 Grant Permission 16-03-2015 Installation of a bio gas upgrading system to allow bio-gas from neighbouring food processing plant to be injected into the national grid</p>	

<b>Site Name</b>	<b>Riverside AD Facility and Bio Waste Treatment Centre</b>
<b>Contact with operator</b>	Yes. Operator was not willing to provide information on the facility.
<b>Opportunity to intensify or upgrade operation</b>	The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

Site Name	<b>UK and European Construction/Ranns Construction</b>
Borough	Merton
Site address	Unit 3-5, 39 Willow Lane, Mitcham, Surrey, CR4 8NA,
OS grid reference	TQ 276 673
Site size (ha)	0.5ha
Location map	 <p>UK and European Construction Unit 3-5, 39 Willow Lane, Mitcham CR4 8NA</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	U K And European Construction Limited
Site owner	Mr Pryor and Mr Manning
Type of facility	SR2010 No12: Treatment of waste to produce soil <75,000 tpy
Max throughput	804
Licensed capacity	75000
Permit number	BB3307GM/A001n
Type of waste accepted	C&D
Management type	Other Treatment
Location and surrounding land uses (existing and proposed)	The site is located within Willow Lane industrial estate surrounded by similar industrial properties. The River Wandle lies to the west of the site. Connect House, which was

<b>Site Name</b>	<b>UK and European Construction/Ranns Construction</b>	
	converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.	
<b>Nature and scale of the facility</b>	A large site comprising a double-storey industrial shed with hardstanding for vehicles, hardstanding for skips and CDE waste.	
<b>Access, congestion and road capacity</b>	Access via Willow Lane. <b>An access road running along the southeast boundary provides vehicle access to the site.</b>	
<b>Opportunity to use rail or waster to transport waste</b>	River Wandle nearby but there is not currently infrastructure to support transportation of waste to this site by water.	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the north east of the site.	
<b>Planning policy designation</b>	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	The whole site falls within Flood Zone 2
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes

<b>Site Name</b>	<b>UK and European Construction/Ranns Construction</b>
<b>Planning history</b>	<p><u>14/P2639</u> Refuse Certificate of Lawfulness 23-09-2014 Application for a lawful development certificate for a waste transfer &amp; recycling centre</p> <p><u>95/P0930</u> Grant Permission 20-12-1995 Use of part of site for the storage and transfer of inert waste arising from cable laying and groundwork operations in connection with use of 39 willow lane as a plant hire business.</p>
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	The current status of this site is unclear. It was refused a certificate of lawfulness in 2014 but there does not appear to be any subsequent application for the site. The exact size of the site is not known and there are conflicting boundaries, but it is estimated to be approximately 0.5ha. It is operating well below its potential as a waste management site and there is the opportunity to intensify operations and increase throughput on the site.

<b>Site Name</b>	<b>Wandle Waste Management</b>
<b>Borough</b>	Merton
<b>Site address</b>	Unit 7, Abbey Industrial Estate, Willow Lane, Mitcham, Surrey, CR4 4NA
<b>OS grid reference</b>	TQ 277 677
<b>Site size (ha)</b>	0.07ha
<b>Location map</b>	
<b>Site operator</b>	Wandle Waste Management Limited
<b>Site owner</b>	Deadman Confidential
<b>Type of facility</b>	A9 : Haz Waste Transfer Station
<b>Max throughput</b>	141
<b>Licensed capacity</b>	24999
<b>Permit number</b>	BB3508TQ/A001
<b>Type of waste accepted</b>	Hazardous
<b>Management type</b>	Transfer
<b>Location and surrounding land uses (existing and proposed)</b>	The site is located within Willow Lane industrial estate surrounded by similar industrial properties. Connect House,

Site Name	<b>Wandle Waste Management</b>	
	which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south of the site.	
Nature and scale of the facility	Double-storey shed	
Access, congestion and road capacity	Access from Willow Lane	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Willow Lane Industrial Estate. Connect House, which was converted to residential use via Prior Approval, lies in the middle of Willow Lane SIL to the south of the site.	
Planning policy designation	SIL/LSIS	Willow Lane SIL
	SLWP	Industrial area suitable for new waste sites
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Areas of MOL and SINC lie to the east and west of Willow SIL.
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	Yes
Planning history	13/P2719 Refuse Certificate of Lawfulness 23-12-2013 Application for a lawful development certificate in respect of the continued existing use of premises for the recycling and	


Site Name	<b>Wandle Waste Management</b>
	storage of secondary aggregate materials including crushing and screening.
<b>Contact with operator</b>	No
<b>Opportunity to intensify or upgrade operation</b>	The throughput on this site is very small and it is not clear what operation takes place on the site as no planning permission seems to exist for a hazardous waste transfer facility for this site. It is unlikely that there is an opportunity to intensify operations at the site.

#### 4.4 South London waste sites - Sutton

Profiled sites:

- 156 Beddington Lane
- 777 Recycling Centre
- Beddington Farmlands ERF
- Beddington Farmlands Landfill Site
- Cannon Hygiene, Mitcham
- Croydon Transfer Station
- Hinton Skips
- Hydro Cleansing, HCL House (wastewater)
- Kimpton Park Way HRRC
- King Concrete, 124 Beddington Lane
- Premier Skip Hire
- Raven Recycling
- TGM Environmental
- Viridor Recycling and Composting Centre



Site Name	<b>156 Beddington Lane (formerly Severnside Waste Paper)</b>
Borough	Sutton
Site address	156 Beddington Lane, Croydon, Surrey, CR0 4TE
OS grid reference	Easting 529505 Northing 167020
Site size (ha)	0.9ha
Location map	
Site operator	N/A
Site owner	777 Recycling
Type of facility	N/A
Max throughput	0
Licensed capacity	0
Permit number	N/A
Type of waste accepted	N/A
Management type	N/A
Location and surrounding land uses (existing and proposed)	This site is part of a large strategic industrial area backing on to tram lines to the rear. Opposite the site (to the west) is land allocated for industry and the ERF. Nearby is the Wandle Valley Regional Park.

<b>Site Name</b>	<b>156 Beddington Lane (formerly Severnside Waste Paper)</b>	
<b>Nature and scale of the facility</b>	Vacant site safeguarded for waste uses. Currently five year permission for temporary B8 uses.	
<b>Access, congestion and road capacity</b>	Access from Beddington Lane. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
<b>Opportunity to use rail or waste to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Beddington SIL. Also located nearby are the Beddington Farmlands Energy from Waste facility and the Croydon Transfer Station.	
<b>Planning policy designation</b>	SIL/LSIS	Beddington SIL
	SLWP	Safeguarded waste site Industrial Area with Sites Suitable for Waste Facilities
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues

<b>Site Name</b>	<b>156 Beddington Lane (formerly Severnside Waste Paper)</b>	
	Proximity to environment designations	MOL located to the west of Beddington Lane
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>D2017/78420</u>   Proposed extension of existing waste land use including on site B8 storage or distribution of 5 years.   Deadman Confidential, 156 Beddington Lane Beddington CR0 4TE</p> <p>Permission granted 12 Feb 2018</p>	
<b>Contact with operator</b>	Yes.	
<b>Opportunity to intensify or upgrade operation</b>	<p>Although it is safeguarded for waste use the site does not currently have a waste operation on site. The estimated potential capacity of this site is 54,000 tonnes per annum based on a potential throughput of 60,000 tonnes per hectare. The owner of this site also owns the adjacent site 777 Recycling at 154a Beddington Lane. He is interested in releasing 156 Beddington Lane from waste uses and providing compensatory capacity at 154a Beddington Lane. As there is no recent waste operation on this site, compensatory capacity should be assumed to be 54,000 tonnes per annum.</p>	

Site Name	<b>777 Recycling Centre</b>
Borough	Sutton
Site address	154a Beddington Lane, Croydon, Surrey, CR0 4TE
OS grid reference	TQ 295 671
Site size (ha)	0.97
Location map	 <p>777 Recycling Centre 153 Beddington Lane, Croydon CR0 4TE</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	777 Recycling Centre Ltd
Site owner	777 Recycling
Type of facility	A15 : Material Recycling Treatment Facility
Max throughput	56,912
Licensed capacity	372,600
Permit number	EB3709KQ/V002
Type of waste accepted	HIC / C&D

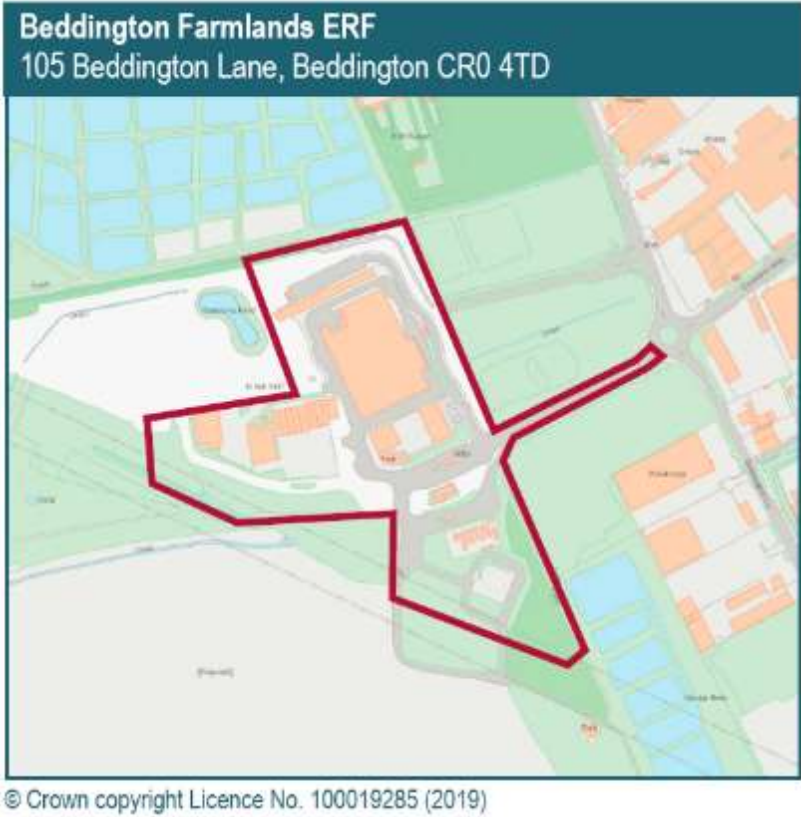
<b>Site Name</b>	<b>777 Recycling Centre</b>	
<b>Management type</b>	Recycling and Reuse	
<b>Location and surrounding land uses (existing and proposed)</b>	This site is part of a large strategic industrial area backing on to tram lines to the rear. Neighbouring uses include a concrete batching operation at 154. Nearby is the Wandle Valley Regional Park.	
<b>Nature and scale of the facility</b>	The site comprises large double-height and triple-height modern industrial sheds and hardstanding for skip storage and parking.	
<b>Access, congestion and road capacity</b>	Vehicle access from Coomber Way. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
<b>Opportunity to use rail or waste to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Beddington SIL. Also located nearby are the Beddington Farmlands Energy from Waste facility and the Croydon Transfer Station.	
<b>Planning policy designation</b>	SIL/LSIS	Beddington SIL
	SLWP	Safeguarded waste site Industrial Area with Sites Suitable for Waste Facilities
	Opportunity area	No

Site Name	<b>777 Recycling Centre</b>	
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	MOL located to the west of Beddington Lane
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>Alterations to existing building incorporating a high level radiator with associated acoustic screen, generator room air intake and heat rejection louvres, roller shutters and new entrance door, stack and generator exhaust flues and a grid connection enclosure to enable the installation of energy from waste plant within existing building.</u> Ref. No: D2013/68218   Status: Application Granted</p> <p><u>Use of the Energy from Waste (EfW) Plant 24 hours a day seven days a week. Remaining uses to be time restricted as per condition 8 shown. (Variation of condition 8 from previously approved app. no. D2005/53827/FUL which permitted use between the hours of 7.30 - 18.00 Mondays to Fridays and 07.30 - 13.00 Saturdays and at no time whatsoever on Sundays, Public or Bank Holidays. Reception of small quantities of materials shall be allowed over 24 hours however no processing or sorting of materials shall be allowed outside the hours of operation).</u> Ref. No: D2013/68217   Status: Application Granted</p> <p><u>Use of Waste Management Centre without complying with condition 8 of planning approval ref: D2005/53827/FUL which states: 'The use</u></p>	

Site Name	<b>777 Recycling Centre</b>
	<p><u>hereby permitted shall operate only between the hours of 0730 - 1800 Monday to Friday and 0730 - 1300 Saturdays and at no time whatsoever on Sundays Public or Bank Holidays. Reception of small quantities of materials shall be allowed over 24 hours however no processing or sorting of materials shall be allowed outside the hours of operation'.</u>                      Ref. No: D2011/63933   Status: Application Granted</p> <p><u>Erection of a boiler flue for use in connection with the proposed bio ethanol plant housed within existing building.</u>                      Ref. No: D2011/63923   Status: Application Granted</p> <p><u>Continued use of Waste Management Centre to include the handling and storage of putrescible waste (Removal of condition no. 16 of previously approved application no. D2005/53827/FUL dated 25 May 2005 that states 'No putrescible waste to be handled or stored on the site'.</u>                      Ref. No: D2009/61769   Status: Application Granted</p> <p><u>Enlargement of existing recycling building to provide an eastern extension to house tyre shredder and removal of condition 3 of previously approved app. no. D2007/58880/FUL that refers to the tyre shredder shall only be operated within the western extension.</u>                      Ref. No: D2008/60318   Status: Application Granted</p> <p><u>Extension of existing waste management centre to provide a storage area for recycled products and a tyre shredding facility and the reduction of parking provision from 23 to 15 spaces without complying with condition 7 of planning approval D2007/58880/FUL by increasing the average number of deliveries to no more than 192 per day on week days and no more than 94 on Saturdays.</u>                      Ref. No: D2008/60230   Status: Application Granted</p> <p><u>Extension of existing waste management centre to provide a storage area for recycled products and a tyre shredding facility and reduction of parking provision from 23 to 15 spaces.</u>                      Ref. No: D2007/58880   Status: Application Granted</p> <p>D2005/53827/FUL – no record of this online</p>

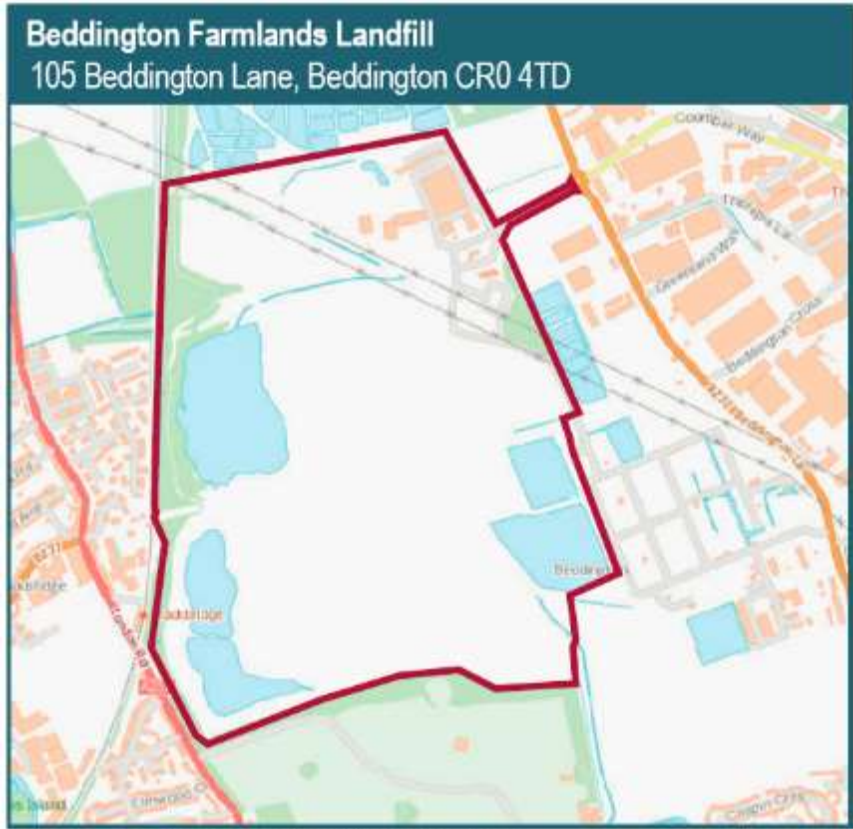
<b>Site Name</b>	<b>777 Recycling Centre</b>
	<p><u>Erection of waste management centre for waste recycling, transfer and associated offices and workshops.</u></p> <p>Ref. No: D2003/51365   Status: Application Granted</p>
<b>Contact with operator</b>	Yes
<b>Opportunity to intensify or upgrade operation</b>	<p>This site has a current maximum recent throughput of just under 57,000 tonnes per annum, but the operator states they could manage 250,000 tonnes of waste per annum if it were financially viable.</p> <p>Therefore, intensification of throughput at this facility is possible, although some intervention may be necessary to make this financially viable for the operator. The owner of this site also owns 156 and 158 Beddington Lane.</p>



Site Name	<b>Beddington Farmlands ERF (part of Beddington Waste Management Facility)</b>
Borough	Sutton
Site address	Beddington Waste Management Facility, 105 Beddington Lane, Surrey, CR0 4TD
OS grid reference	Unknown
Site size (ha)	7.44
Location map	
Site operator	Viridor Waste Management Limited
Site owner	Thames Water / Viridor
Type of facility	Energy from Waste
Max throughput	275,000
Licensed capacity	302,500
Permit number	
Type of waste accepted	HIC
Management type	Energy from Waste


Site Name	<b>Beddington Farmlands ERF (part of Beddington Waste Management Facility)</b>	
Location and surrounding land uses (existing and proposed)	The ERF lies within the Wandle Valley Regional Park, adjacent to Viridor Recycling Facility and Beddington Farm landfill site. Beddington SIL is nearby. The land immediately to the east is allocated in the Sutton Local Plan for industry.	
Nature and scale of the facility	Large energy recovery facility.	
Access, congestion and road capacity	Access from Beddington Lane and the vehicle routing to the site is through Beddington SIL.  There is a major traffic congestion in nearby Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
Opportunity to use rail or waste to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Beddington Waste Management Facility and also in nearby Beddington SIL.	
Planning policy designation	SIL/LSIS	No
	SLWP	Safeguarded Waste Site
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	/ MOL	MOL
	Flood Affected	No
	Heritage assets	Archaeological Priority Area

Site Name	<b>Beddington Farmlands ERF (part of Beddington Waste Management Facility)</b>	
	Land instability	No known issues
	Proximity to environment designations	Metropolitan Open Land Metropolitan Green Chain SINC Wandle Valley Regional Park
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
Planning history	D2016/66220	
Contact with operator	Yes	
Opportunity to intensify or upgrade operation	This is a new facility and therefore there are no opportunities to upgrade or intensify operations at the current time.	

Site Name	<b>Beddington Farmlands Landfill Site</b>
Borough	Sutton
Site address	105, Beddington Lane, Beddington, Surrey, CR0 4TD,
OS grid reference	TQ 293 673
Site size (ha)	92
Location map	 <p><b>Beddington Farmlands Landfill</b> 105 Beddington Lane, Beddington CR0 4TD</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Viridor Waste Management Limited
Site owner	
Type of facility	L04 : Non Hazardous LF
Max throughput	291,513 cubic metres remaining capacity
Licensed capacity	990,000
Permit number	BP3190EY/T003
Type of waste accepted	HIC / C&D
Management type	Landfill

Site Name	<b>Beddington Farmlands Landfill Site</b>	
Location and surrounding land uses (existing and proposed)	The site forms part of the Wandle Valley Regional Park. Beddington ERF and Viridor Recycling Facility is adjacent to the site. Beddington SIL is nearby.	
Nature and scale of the facility	Landfill site which is nearing the end of its operational life.	
Access, congestion and road capacity	<p>Access from Beddington Lane. The site is distant from residential areas and the vehicle routing to the site is primarily through Beddington SIL.</p> <p>There is a major traffic congestion in nearby Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.</p>	
Opportunity to use rail or waste to transport waste	This is not a realistic opportunity.	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Beddington Waste Management Facility and also in nearby Beddington SIL.	
Planning policy designation	SIL/LSIS	No
	SLWP	Safeguarded Waste Site
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	MOL
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues

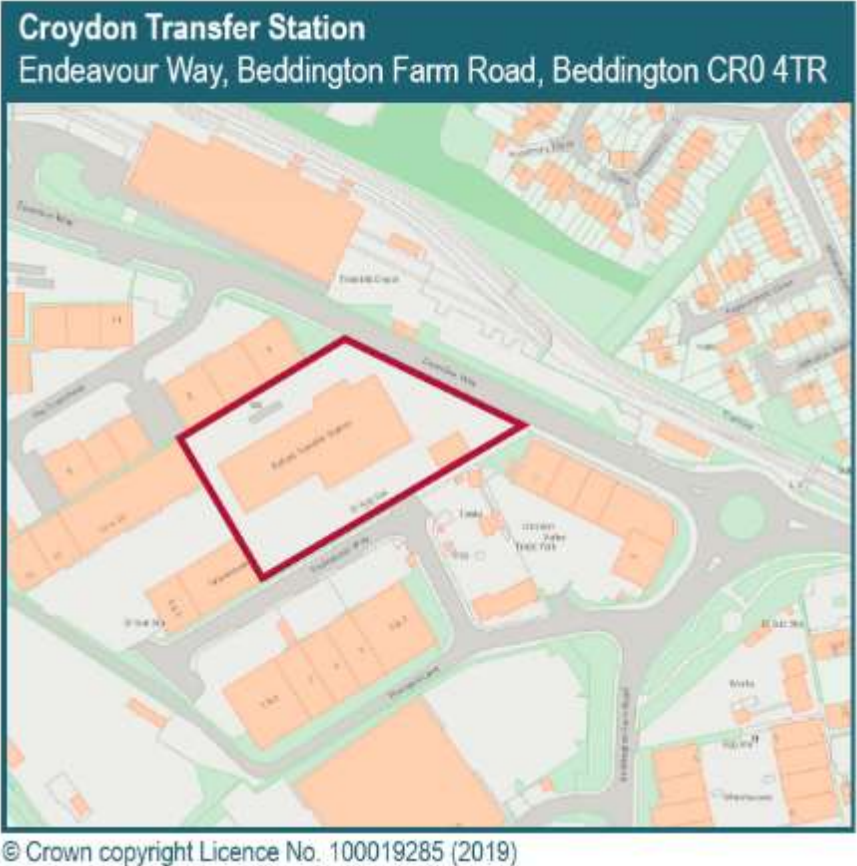
Site Name	<b>Beddington Farmlands Landfill Site</b>	
	Proximity to environment designations	Metropolitan Open Land Metropolitan Green Chain SINC Wandle Valley Regional Park
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	Planning permission until 2023	
<b>Contact with operator</b>	Yes	
<b>Opportunity to intensify or upgrade operation</b>	This site has planning permission to operate until 2023 when it will be restored for nature conservation and as public open space and will become a principal part of the Wandle Valley Regional Park. Therefore there is no opportunity to expand or upgrade operations on the site.	

Site Name	<b>Cannon Hygiene, Mitcham</b>
Borough	Sutton
Site address	Unit 4, Beddington Lane Industrial Estate, 131 Beddington Lane, Croydon, Surrey, CR0 4TG
OS grid reference	TQ 291 673
Site size (ha)	0.2ha
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Cannon Hygiene Limited
Site owner	Not known
Type of facility	S0824 : Clinical Waste Transfer Station
Max throughput	9,601
Licensed capacity	75,000
Permit number	FB3806XT/T001
Type of waste accepted	Hazardous

<b>Site Name</b>	<b>Cannon Hygiene, Mitcham</b>	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	Beddington Lane Industrial Estate lies at the northern end of the Purley Way and Beddington SIL. It comprises large double-height industrial sheds incorporating office space.	
<b>Nature and scale of the facility</b>	Modern double-height industrial unit.	
<b>Access, congestion and road capacity</b>	Access to Beddington Lane Industrial Estate is from Beddington Lane. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane.	
<b>Planning policy designation</b>	SIL/LSIS	Beddington SIL
	SLWP	Industrial Area with Sites Suitable for Waste Facilities
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA




Site Name	<b>Cannon Hygiene, Mitcham</b>	
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	No
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>Use of premises for a mix of clinical waste and healthcare waste transfer station (Sui Generis) and as a storage facility (Class B8) together with ancillary office accommodation and retention of parking spaces.</u></p> <p>Ref. No: D2015/72172   Status: Application Granted</p>	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	<p>This site is not safeguarded as a waste site in Sutton’s policies map and there is an opportunity to do so in the new SLWP. The throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase the throughput with intervention but further investigation on the deliverability of this will be required.</p>	

Site Name	<b>Croydon Transfer Station (Beddington Farm Transfer Station)</b>
Borough	Sutton
Site address	Endeavour Way, Beddington Farm Road, Sutton, Surrey, CR0 4TR,
OS grid reference	TQ 300 668
Site size (ha)	0.74
Location map	
Site operator	Veolia E S Cleanaway ( U K ) Ltd
Site owner	A N Solomons
Type of facility	S0803 : HCI Waste TS + treatment
Max throughput	27,799
Licensed capacity	75,000
Permit number	SP3390EA/V006
Type of waste accepted	HIC
Management type	Transfer


<b>Site Name</b>	<b>Croydon Transfer Station (Beddington Farm Transfer Station)</b>	
<b>Location and surrounding land uses (existing and proposed)</b>	The site lies within a large industrial estate (Beddington SIL) surrounded by similar industrial properties.	
<b>Nature and scale of the facility</b>	Double- and triple-height enclosed sheds with hardstanding for vehicles.	
<b>Access, congestion and road capacity</b>	Access from Endeavour Way. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods.	
<b>Planning policy designation</b>	SIL/LSIS	Beddington SIL
	SLWP	Safeguarded Waste Site
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues

Site Name	<b>Croydon Transfer Station (Beddington Farm Transfer Station)</b>	
	Proximity to environment designations	No
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>D2009/61842</u>   Alterations to elevations of existing waste transfer station building, provision of a new weighbridge and alteration to vehicle circulation and parking layout.   Waste Transfer Station Endeavour Way Beddington CR0 4TR</p> <p>Application Granted 30 Dec 2009</p>	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	<p>This site seems to be operating below the average throughput for this type of facility. However it has not been possible to contact Veolia to discuss this further.</p>	

Site Name	<b>Hinton Skips</b>
Borough	Sutton
Site address	Land to the rear of 112 Beddington Lane, Sutton CR0 4TD
OS grid reference	Easting 530376 Northing 165660
Site size (ha)	0.6ha
Location map	 <p><b>Hinton Skips</b> rear of 112 Beddington Lane, CR0 4TD</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Hinton Skips UK Ltd
Site owner	Highgrey Storage Service Ltd
Type of facility	Skip waste recycling and recovery centre
Max throughput	8,000
Licensed capacity	75,000
Permit number	CB3803HK/A001
Type of waste accepted	CD&E
Management type	HCI Waste TS + treatment
Location and surrounding land	The site lies within a large industrial estate (Beddington SIL) surrounded by similar industrial properties.

<b>Site Name</b>	<b>Hinton Skips</b>	
uses (existing and proposed)		
Nature and scale of the facility	Enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles.	
Access, congestion and road capacity	The site does not have direct frontage onto the Beddington Lane being set back some 400m from the highway at the end of a made up access way that also provides access to a number of other businesses. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane. However these facilities are mostly located away from residential neighbourhoods.	
Planning policy designation	SIL/LSIS	Beddington Lane SIL
	SLWP	Area suitable for waste uses
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	Area at risk of flooding
	Heritage assets	Archaeological Priority Area Scheduled monument 80m to the west
	Land instability	No known issues


Site Name	<b>Hinton Skips</b>	
	Proximity to environment designations	No
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>Erection of a single storey building to provide office and staff facilities.</u> Ref. No: 78/17385   Status: Application Granted</p> <p><u>Proposed use of the site for a skip waste recycling and recovery centre involving the erection of a building to house all processing operations and plant, the erection of double stacked portacabin and welfare units, the laying out of the remaining part of the yard with concrete, retention of existing boundary sleeper walls, erection of pallisade fencing, HGV and car parking and cycle facilities.</u> Ref. No: D2017/76638   Status: Application Granted</p> <p><u>Change of use from re-cycling facility to B8 storage and distribution.</u> Ref. No: D2016/74929   Status: Application Granted</p>	
<b>Contact with operator</b>	Yes	
<b>Opportunity to intensify or upgrade operation</b>	<p>This is a new facility which has only been operating for a short time. The operational throughput capacity of 8,000tpa has been estimated based on the first quarterly return by the company. However the planning application states that up to 50,000 tonnes will be managed on the site. The estimated throughput is lower than the average throughput for this type of facility and further monitoring will be required when data becomes available through the WDI.</p>	

Site Name	<b>Hydro Cleansing, HCL House (wastewater)</b>
Borough	Sutton
Site address	Beddington Farm Road, Croydon, Surrey, CR0 4XB,
OS grid reference	TQ 301 666
Site size (ha)	0.2
Location map	
Site operator	Hydro Cleansing Limited
Site owner	Not known
Type of facility	A16 : Physical Treatment Facility
Max throughput	13,912
Licensed capacity	100,000
Permit number	CB3501ST/V003
Type of waste accepted	Wastewater / CD&E
Management type	Other Treatment



<b>Site Name</b>	<b>Hydro Cleansing, HCL House (wastewater)</b>	
<b>Location and surrounding land uses (existing and proposed)</b>	The site is located on Beddington Farm Road, in the Beddington SIL. It is adjacent to the Surrey Jaguar Centre and the Royal Mail Centre.	
<b>Nature and scale of the facility</b>	Fronted by two-storey 1960s office block with facility to rear.	
<b>Access, congestion and road capacity</b>	Access from Beddington Farm Road. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
<b>Opportunity to use rail or water to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane.	
<b>Planning policy designation</b>	SIL/LSIS	Beddington SIL
	SLWP	Area with sites suitable for waste facilities
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues

Site Name	<b>Hydro Cleansing, HCL House (wastewater)</b>	
	Proximity to environment designations	No
	Town Centre Hierarchy	NO
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><u>D2015/72382</u>   Retention of use of the premises as a waste recycling facility (Use Class Sui Generis) for the acceptance and processing of water containing non-hazardous soils and stones to enable the recovery and re-use of those materials, together with the retention of associated infrastructure including fixed plant and underground storage tanks.   Land To The Side And Rear Of HCL House Beddington Farm Road Beddington CR0 4XB Application Granted 23 Oct 2015</p>	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	<p>The throughput per hectare is typical for this type of facility so it is unlikely that it will be able to intensify operations in its current form.</p> <p>The site is not safeguarded as a waste site and there is an opportunity to do so through the new SLWP.</p>	

Site Name	<b>Kimpton Park Way HRRC</b>
Borough	Sutton
Site address	Kimpton Park Way HRRC, Kimpton Road, Sutton, Surrey, SM3 9QH,
OS grid reference	TQ 248 657
Site size (ha)	0.44
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Veolia E S ( U K ) Limited
Site owner	LB Sutton
Type of facility	A13 : Household Waste Amenity Site
Max throughput	14,799
Licensed capacity	24,999
Permit number	DB3403HB/T001
Type of waste accepted	HIC
Management type	Transfer

<b>Site Name</b>	<b>Kimpton Park Way HRRC</b>	
<b>Location and surrounding land uses (existing and proposed)</b>	Located in the north-west of the Kimpton SIL. The site is opposite the Kimpton Linear Park, which is designated Metropolitan Green Chain, MOL, Public Open Space and SINC.	
<b>Nature and scale of the facility</b>	Open local authority reuse and recycling centre.	
<b>Access, congestion and road capacity</b>	Access via Kimpton Park Way and Minden Road	
<b>Opportunity to use rail or waster to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	Premier Skips is located in nearby Sandiford Road	
<b>Planning policy designation</b>	SIL/LSIS	Kimpton SIL
	SLWP	Safeguarded Waste Site
	Opportunity area	No
	Other designations	No
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	No
	Land instability	No known issues
	Proximity to environment designations	No
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<u>Removal of three trees and replacement with low level planting to provide improved visibility splay for vehicles (Variation of</u>	

<b>Site Name</b>	<b>Kimpton Park Way HRRC</b>
	<p><u>conditions 5 and 6 of previously approved application number A2003/51174/FUL).</u></p> <p>Ref. No: A2009/61228   Status: Application Granted</p>
<b>Contact with operator</b>	Yes
<b>Opportunity to intensify or upgrade operation</b>	There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site. It has not been possible to contact the operator Veolia.


Site Name	<b>King Concrete, 124 Beddington Lane</b>
Borough	Sutton
Site address	124 Beddington Lane, Croydon, Surrey, CR0 4YZ,
OS grid reference	TQ 300 663
Site size (ha)	0.42
Location map	
Site operator	King Concrete Limited
Site owner	Not known
Type of facility	S1506: 75kte HCl Waste TS + Treatment
Max throughput	1,060
Licensed capacity	74,999
Permit number	CB3202LJ/A001
Type of waste accepted	C&D

<b>Site Name</b>	<b>King Concrete, 124 Beddington Lane</b>	
<b>Management type</b>	Transfer	
<b>Location and surrounding land uses (existing and proposed)</b>	Part of Beddington SIL, surrounded by similar uses.	
<b>Nature and scale of the facility</b>	Open site for concrete production and aggregates recovery.	
<b>Access, congestion and road capacity</b>	Access from Beddington Lane. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
<b>Opportunity to use rail or water to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane.	
<b>Planning policy designation</b>	SIL/LSIS	Beddington SIL
	SLWP	Industrial Area with Sites Suitable for Waste
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA

Site Name	<b>King Concrete, 124 Beddington Lane</b>	
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	No
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
Planning history	<p><u>Demolition of existing buildings and change of use to B2 (General Industrial) for the production of ready mix concrete involving the erection of a building to house a crushing plant for the recovery of inert concrete and aggregates from construction and demolition waste, erection of a office building, two silos, walled storage bays and fencing, sleeper wall, a weighbridge and associated HGV, car and cycle parking.</u>                      124 Beddington Lane Beddington CR0 4TD                      Ref. No: D2016/74915   Received: Tue 19 Jul 2016   Validated: Wed 24 Aug 2016   Status: Application Granted</p> <p><u>Use of premises as an enclosed recycling centre with associated parking and cycle facilities.</u>                      124 Beddington Lane Beddington Surrey CR0 4TD                      Ref. No: D2010/63252   Received: Thu 19 Aug 2010   Validated: Mon 11 Oct 2010   Status: Application Granted</p> <p><u>Erection of a rear extension to provide storage and garage accommodation.</u>                      122-124 Beddington Lane, Beddington,                      Ref. No: N1995/39904   Received: Tue 11 Jul 1995   Validated: Tue 18 Jul 1995   Status: Application Granted</p>	
Contact with operator	No	
Opportunity to intensify or upgrade operation	Although not all of the site is a dedicated waste recycling facility, it is managing well under the average throughput for this type of facility. The planning application states that the facility will recycle 20,000 tonnes of CD&E waste on site and there may be an opportunity for the facility to recycle a higher amount of CD&E waste with	




Site Name	<b>King Concrete, 124 Beddington Lane</b>
	intervention but further investigation on the deliverability of this will be required.

Site Name	<b>Premier Skip Hire</b>
Borough	Sutton
Site address	Unit 12 Sandiford Road, Kimpton Industrial Estate, Sutton, SM3 9RD
OS grid reference	Easting 524587 Northing 165764
Site size (ha)	0.1ha
Location map	<div style="border: 1px solid black; padding: 5px;"> <p style="background-color: #004a60; color: white; padding: 2px;"><b>Premier Skip Hire</b> Unit 12 Sandiford Road, Kimpton Industrial Estate, SM3 9RD</p>  <p style="font-size: small; margin-top: 5px;">© Crown copyright Licence No. 100019285 (2019)</p> </div>
Site operator	Premier Skips
Site owner	LB Sutton
Type of facility	Transfer
Max throughput	12,000
Licensed capacity	75,000
Permit number	DB3309XL/A001
Type of waste accepted	HIC and CD&E


Site Name	<b>Premier Skip Hire</b>	
Management type	Recycling and transfer	
Location and surrounding land uses (existing and proposed)	The closest residential properties are 75-100m to the south and west of the site on Hamilton Avenue	
Nature and scale of the facility	Two-storey office and warehouse building with hardstanding for skip storage.	
Access, congestion and road capacity	Access to Sandiford Road via Kimpton Road	
Opportunity to use rail or waster to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	The site is near to Kimpton household recycling and reuse centre.	
Planning policy designation	SIL/LSIS	Kimpton SIL
	SLWP	Industrial Area with Sites Suitable for Waste Facilities
	Opportunity area	No
	Other designations	No
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	No
	Land instability	No known issues
	Proximity to environment designations	SINC to the south and west
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
Planning history	<u>Erection of a four storey side extension and addition of a second and third floor to front office element of existing</u>	

Site Name	<b>Premier Skip Hire</b>
	<p><u>building, installation of rainscreen cladding and creation of two parking spaces.</u> Ref. No: DM2018/00132   Status: Application Granted</p> <p><u>Erection of a single-storey industrial building with ancillary office accommodation, car parking facilities and access road 54-1-53</u> Ref. No: 72/9633   Status: Application Granted</p> <p><u>Use of premises and site as a waste transfer and recycling station and provision of a 7metre high screen fence at rear (facing Minden Road).</u> Ref. No: A2015/72203   Status: Application Granted</p> <p><u>Demolition of warehouse section of existing warehouse and office unit and construction of new warehouse on enlarged footprint and increased height to provide skip storage area and provision of new access gates onto Minden Road.</u> Ref. No: A2013/67302   Status: Application Granted</p> <p><u>Provision of ramped access involving alterations to elevation</u> Ref. No: A2006/56878   Status: Application Granted</p>
<b>Contact with operator</b>	Yes
<b>Opportunity to intensify or upgrade operation</b>	This site is not safeguarded on Sutton’s policies map and there is an opportunity to do so in the new SLWP. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form.

Site Name	<b>Raven Recycling</b>
Borough	Sutton
Site address	Unit 8-9 Endeavour Way, Beddington Farm Road, Croydon, Surrey, CR0 4TR,
OS grid reference	TQ 300 668
Site size (ha)	0.25
Location map	
Site operator	Raven Waste Paper Company Ltd
Site owner	Not known
Type of facility	S0803 : HCI Waste TS + treatment
Max throughput	15,224
Licensed capacity	74999
Permit number	AB3507GG/A001
Type of waste accepted	HIC / C&D
Management type	Transfer

Site Name	<b>Raven Recycling</b>	
Location and surrounding land uses (existing and proposed)	The site lies within a large industrial estate (Beddington SIL) surrounded by similar industrial properties.	
Nature and scale of the facility	Double-height enclosed sheds with hardstanding for skips.	
Access, congestion and road capacity	Access from Endeavour Way. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.	
Opportunity to use rail or water to transport waste	No	
Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community	There is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane.	
Planning policy designation	SIL/LSIS	Beddington SIL
	SLWP	No designations
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	No
	Flood Affected	No
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	No

Site Name	<b>Raven Recycling</b>	
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning History</b>	<p><u>D2013/67162</u>   Retrospective application for the use of the premises for purposes falling within Use Classes B1(business), B2 (general industrial, B8 (storage or distribution) and a waste transfer station (sui generis).   Units 8-9 Endeavour Way Beddington CR0 4TR Application Granted 11 Jul 2013</p>	
<b>Contact with operator</b>	No	
<b>Opportunity to intensify or upgrade operation</b>	<p>This site is not safeguarded on Sutton’s policies map and there is an opportunity to do so in the new SLWP. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form.</p>	

Site Name	<b>TGM Environmental</b>
Borough	Sutton
Site address	112 Beddington Lane, CR0 4TD
OS grid reference	TQ 30168 65650
Site size (ha)	0.2ha
Location map	 <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	TGM Environmental
Site owner	Spaces4work Ltd
Type of facility	Transfer
Max throughput	15,000
Licensed capacity	Information not yet available
Permit number	Information not yet available
Type of waste accepted	HIC
Management type	Bulking for onward reprocessing of paper and plastic
Location and surrounding land uses (existing and proposed)	The site occupies the land at the front of 112 Beddington Lane which covers a total area of approximately 1.7 Ha. 112 Beddington Lane is sub-divided into a number of parcels of land that are let for industrial uses. The site lies within

Site Name	<b>TGM Environmental</b>		
	<p>Beddington Lane SIL and Viridor Energy from Waste Facility and Beddington Sewage Treatment Works lie to the west. The closest residential properties to the application site are located approximately 40m to the west on the opposite side of Beddington Lane in Harrington Close. A Wickes DIY &amp; Trade supplies store is located immediately to the north of the application site, and CPI Group a printing and publishing company are located in an industrial unit immediately to the south.</p>		
<p><b>Nature and scale of the facility</b></p>	<p>Waste paper and waste cardboard recovery and transfer facility comprising a weigh bridge, portacabin offices, parking and areas for sorting and baling.</p>		
<p><b>Access, congestion and road capacity</b></p>	<p>Access is from Beddington Lane. There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.</p>		
<p><b>Opportunity to use rail or waster to transport waste</b></p>	<p>No</p>		
<p><b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b></p>	<p>There is a concentration of waste uses in Beddington SIL and also nearby in Beddington Waste Management Facility, 105 Beddington Lane.</p>		
<p><b>Planning policy designation</b></p>	<p>SIL/LSIS</p>	<p>Beddington Lane SIL</p>	
	<p>SLWP</p>	<p>No designations</p>	
	<p>Opportunity area</p>	<p>No</p>	
	<p>Other designations</p>	<p>None</p>	
	<p>Air Quality Focus Area</p>	<p>Borough-wide AQMA Not within a AQFA</p>	
	<p>Greenbelt / MOL</p>	<p>No</p>	
	<p>Flood Affected</p>	<p>Area at risk of flooding</p>	



Site Name	TGM Environmental	
	Heritage assets	Archaeological Priority Area Scheduled monument 80m to the west
	Land instability	No known issues
	Proximity to environment designations	No
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
<b>Planning history</b>	<p><a href="#">DM2018/01850</a>   Change of use to a waste paper and waste cardboard recovery and transfer facility and erection of a single storey ancillary office building.   112 Beddington Lane Beddington CR0 4TD Application Granted 14 Jan 2019</p>	
<b>Contact with operator</b>	Yes	
<b>Opportunity to intensify or upgrade operation</b>	<p>The operation has been relocated from 156 Beddington Lane and the additional space enables the operator to undertake baling on site which did not take place on the previous site. This constitutes an improvement to the operation which now contributes towards apportionment capacity. The throughput is average for the size of site and it is unlikely that the facility can be intensified in its current form.</p> <p>The site is not safeguarded as a waste site in Sutton’s proposals map and there is an opportunity to do so through the new SLWP.</p>	

Site Name	<b>Viridor Recycling and Composting Centre (part of Beddington Waste Management Facility)</b>
Borough	Sutton
Site address	Beddington Waste Management Facility, 105 Beddington Lane, Croydon CR0 4TD
OS grid reference	Easting 529300 Northing 166721
Site size (ha)	5.02
Location map	 <p>Viridor Recycling &amp; Composting Centre (part of Beddington Waste Management Facility), 105 Beddington Lane, Croydon CR0 4TD</p> <p>© Crown copyright Licence No. 100019285 (2019)</p>
Site operator	Viridor
Site owner	Thames Water Utilities
Type of facility	A11 : Household, Commercial & Industrial Waste T Stn
Max throughput	103,751
Licensed capacity	240,000
Permit number	FB3804XU/T001
Type of waste accepted	HIC
Management type	Composting and transfer

<b>Site Name</b>	<b>Viridor Recycling and Composting Centre (part of Beddington Waste Management Facility)</b>	
<b>Location and surrounding land uses (existing and proposed)</b>	Site forms part of the Beddington Waste Management Facility including a landfill site and ERF. The site is located on open land which abuts an industrial area. There is sewage works infrastructure surrounding a significant part of the site with some industrial uses to the east. Beddington SIL is adjacent.	
<b>Nature and scale of the facility</b>	The site comprises hardstanding and enclosed buildings for recycling food waste, storage of green waste, compost, recycle, bulky items, residual waste.	
<b>Access, congestion and road capacity</b>	<p>Access from Beddington Lane. The site is distant from residential areas and the vehicle routing to the site is primarily through Beddington SIL.</p> <p>There is a major traffic congestion in Beddington SIL, particularly on Beddington Lane and Beddington Farm Road at peak times. This is exacerbated further by the high amount of through traffic and high levels of on-street parking which has the effect of reducing roads to one way movement in certain locations.</p>	
<b>Opportunity to use rail or water to transport waste</b>	No	
<b>Cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community</b>	There is a concentration of waste uses in Beddington Waste Management Facility and also in nearby Beddington SIL.	
<b>Planning policy designation</b>	SIL/LSIS	No
	SLWP	Safeguarded Waste Site
	Opportunity area	No
	Other designations	None
	Air Quality Focus Area	Borough-wide AQMA Not within a AQFA
	Greenbelt / MOL	MOL
	Flood Affected	No

Site Name	<b>Viridor Recycling and Composting Centre (part of Beddington Waste Management Facility)</b>	
	Heritage assets	Archaeological Priority Area
	Land instability	No known issues
	Proximity to environment designations	Metropolitan Open Land Metropolitan Green Chain SINC Wandle Valley Regional Park
	Town Centre Hierarchy	No
	B1a – C3 Article 4 Area	No
	<b>Planning history</b>	<p>Temporary permission until 2022.</p> <p><u>Application to vary condition 2 ( night time operations) of planning permission DM2018/00476 'Application for the variation of Condition 1 (approved drawings) and removal of condition 4 (storage of skips) of approved application D2015/72902/FUL to allow for a revised site layout (realigning of kerb, fence and hardstanding within site) and increase in height of compost tunnels to allow for loading and unloading of recyclate material to be undertaken inside a building and storage of skips within the site' to allow the bulking and transfer of residual waste during night time periods.</u> Ref. No: DM2019/00504   Status: Pending Consideration</p> <p><u>Application for the variation of Condition 1 (approved drawings ) and removal of condition 4 (storage of skips) of approved application D2015/72902/FUL to allow for a revised site layout (realigning of kerb, fence and hardstanding within site) and increase in height of compost tunnels to allow for loading and unloading of recyclate material to be undertaken inside a building and storage of skips within the site.</u> Ref. No: DM2018/00476   Status: Application Granted</p> <p><u>Retrospective application for the construction of a hardstanding area for the reception and validation of waste, a temporary litter fence and access route. Temporary facility for a period of three years.</u> Ref. No: D2009/61207   Status: Application Granted</p>

Site Name	<b>Viridor Recycling and Composting Centre (part of Beddington Waste Management Facility)</b>
	<p><u>Temporary use of office car park for the reception &amp; storage of green waste at weekends and public bank holidays only for a period of three years.</u> Ref. No: D2008/60073   Status: Application Granted</p> <p><u>Provision of a polytunnel.</u> Ref. No: D2003/51025   Status: Application Granted</p> <p><u>Variation to condition 7.2 of Planning permission allowed on appeal under reference APP/P5870/A/94/238692/P5 to permit the disposal of Local Authority waste on Saturdays 13.00-16.00 hours, Sundays 09.00-16.00 hours and Public and Bank Holidays 09.00-16.00 hours (except Christmas Day, Boxing Day and New Years Day) with half an hour at the end of the day to allow for cover of the waste material. The use shall be discontinued on or before 30 June 2005 (variation of condition 1 of previously approved application D2002/48783/FUL).</u> Ref. No: D2003/50681   Status: Application Granted</p>
Contact with operator	Yes
Opportunity to intensify or upgrade operation	Temporary permission until 2022, part of contract with SLWP. The current waste operator has a permit for the site until 2023, after which the site is intended to become a country park within the proposed Wandle Valley Regional Park.

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## Croydon Council

<b>REPORT TO:</b>	<b>CABINET 21<sup>st</sup> OCTOBER 2019</b>
<b>SUBJECT:</b>	<b>INVESTING IN OUR BOROUGH</b>
<b>LEAD OFFICER:</b>	<b>SARAH WARMAN, DIRECTOR OF COMMISSIONING &amp; PROCUREMENT</b>  <b>JACQUELINE HARRIS-BAKER, EXECUTIVE DIRECTOR RESOURCES</b>
<b>CABINET MEMBER:</b>	<b>COUNCILLOR SIMON HALL</b> <b>CABINET MEMBER FOR FINANCE AND RESOURCES</b>
<b>WARDS:</b>	<b>ALL</b>
<p><b>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:</b> Effective outcome based commissioning and prudent financial transactions contribute to all corporate priorities.</p> <p>The Council's Commissioning Framework (2019 – 2023) sets out the approach to commissioning and procurement and puts delivery of outcomes at the heart of the decision making process. As the Council develops more diverse service delivery models, it is important to ensure that our contractual and partnership relationships are not only aligned to our corporate priorities but also represent value for money for citizens and taxpayers, contributing to the growth agenda for Croydon.</p>	
<p><b>FINANCIAL SUMMARY:</b> There are no direct costs arising from this report.</p>	
<p><b>KEY DECISION REFERENCE NO.:</b> There are key decisions mentioned in this report, but approval of the Recommendations would not constitute a key decision.</p>	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

### **1 RECOMMENDATIONS**

1.1. The Cabinet is requested to approve:

1.1.1. The award of contract for Section 75: Public Health Nursing in accordance with the recommendations set out in the report at agenda item 11;

1.1.2. The award of contract variation for Agency Contract in accordance with the recommendations set out in the report at agenda item 14a;

1.2. The Cabinet is requested to note:

1.2.1. The list of delegated award decisions made by the Director of Commissioning and Procurement, between 16/08/2019 – 16/09/2019.

1.2.2. The contracts over £500,000 anticipated to be awarded by the nominated Cabinet Member, in consultation with the nominated Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.

1.2.3. Property acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.

## **2 EXECUTIVE SUMMARY**

2.1 This is a standard report which is presented to the Cabinet, for information, at every scheduled Cabinet meeting to update Members on:

- Delegated contract award decisions made by the Director of Commissioning and Procurement 16/08/2019 – 16/09/2019;
- Contract awards and strategies to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item;
- Property lettings, acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;
- Contracts anticipated to be awarded under delegated authority from the Leader by the nominated Cabinet Member, in consultation with the Cabinet Member for Finance and Resources and with the Leader in certain circumstances, before the next meeting of Cabinet;
- Delegated contract award decisions under delegated authority from the Leader by the Nominated Cabinet Members for Finance and Resources & for Children, Young People & Learning related to the new Addington Valley SEN School;  
[As at the date of this report there are none].
- Partnership arrangements to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item.  
[As at the date of this report there are none].

## **3 DETAIL**

3.1 Section 4.1.1 of this report lists those contract and procurement strategies that are anticipated to be awarded or approved by the Cabinet.



- 3.2 Section 4.1.2 of this report lists those contracts that are anticipated to be awarded by the nominated Cabinet Member.
- 3.3 Section 4.2.1 of this report lists the delegated award decisions made by the Director of Commissioning and Procurement, between 16/08/2019 – 16/09/2019.
- 3.4 Section 4.3.1 of this report lists the property lettings, acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.
- 3.5 The Council's Procurement Strategy and Tender & Contracts Regulations are accessible under the Freedom of Information Act 2000 as part of the Council's Publication Scheme. Information requested under that Act about a specific procurement exercise or contract held internally or supplied by external organisations, will be accessible subject to legal advice as to its commercial confidentiality, or other applicable exemption, and whether or not it is in the public interest to do so.

#### **4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

##### **4.1 Proposed Contract Awards**

- 4.1.1 Contract award for the purchase of goods, services and works with a possible contract value over £5 million decisions to be taken by Cabinet which are agenda item XX.

<b>ContractTitle</b>	<b>Contract Revenue Budget</b>	<b>Contract Capital Budget</b>	<b>Dept/Cabinet Member</b>
Section 75: Public Health Nursing	£40,999,000 (Contract length 7 years)		Children, Young People and Learning / Cllr Flemming
Agency Contract Variation	£135,000,000 (Increase in cost by £55,000,000) (12 months extension)		Finance and Resources / Cllr Hall

- 4.1.2 Revenue and Capital consequences of contract award decisions to be made between £500,000 to £5,000,000 by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.

<b>Contract Title</b>	<b>Contract Revenue Budget</b>	<b>Contract Capital Budget</b>	<b>Dept/Cabinet Member</b>
Housing IT System Extension (OHMS)	£626,831 (Increase in cost by £129,153) (12 months extension)		Finance and Resources / Cllr Hall
People's IT Systems Implementation - Variation		£1,439,780 (Increase in cost by £378,300) (6 months extension)	Finance and Resources / Cllr Hall

## 4.2 Contract Awards

4.2.1 Revenue and Capital consequences of delegated decisions made by the Director of Commissioning and Procurement for contract awards (Regs. 19, 28.3 a & b) between £100,000 & £500,000 and contract extension(s) previously approved as part of the original contract award recommendation (Reg. 28.4 d) and contract variations (Reg.30).

<b>Contract Title</b>	<b>Contract Revenue Budget</b>	<b>Contract Capital Budget</b>	<b>Dept/Cabinet Member</b>
Provision of Fibre Broadband Employer Agent (FEA) and Fibre Project Co-Ordinator (FPC) Award Report	£431,200 (Contract length 2 years)		Homes & Gateway Services / Cllr Butler
Croydon Medium Term Financial Strategy Review Support (MTFS) 2030	£170,000 (Contract length 7 months)		Finance and Resources / Cllr Hall

## 4.3 Property Acquisitions and Disposals

4.3.1 Revenue and Capital consequences of property lettings, acquisitions and disposals over £500,000 to be agreed by the Cabinet Member for Finance and Resources in consultation with the Leader of the Council.

Title	Lettings	Disposals	Acquisitions	Dept/Cabinet Member
Letting of the 2nd floor annex BWH to NHS Property Services	Commercially sensitive – refer to background document			Finance & Resources / Cllr Hall
Letting of unit 7C the Colonnades to K&Z South London Ltd	Commercially sensitive – refer to background document			Finance & Resources / Cllr Hall

Approved by: Ian Geary, Head of Finance - Resources on behalf of Lisa Taylor, Director of Finance, Investment and Risk and Section 151 Officer.

## 5 LEGAL CONSIDERATIONS

- 5.1 The Director of Law and Governance comments that the information contained within this report is required to be reported to Members in accordance with the Council's Tenders and Contracts Regulations and the council's Financial Regulations in relation to the acquisition or disposal of assets.

Approved by: Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer.

## 6 HUMAN RESOURCES IMPACT

- 6.1 There are no immediate HR issues that arise from the strategic recommendations in this report for LBC staff. Any specific contracts that arise as a result of this report should have their HR implications independently assessed by a senior HR professional.

Approved by: Sue Moorman, Director of Human Resources

## 7 EQUALITY IMPACT

- 7.1 An Equality Analysis process has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.

- 7..2 The equality analysis for the contracts mentioned in this report will enable the Council to ensure that it meets the statutory obligation in the exercise of its functions to address the Public Sector equality duty (PSED). This requires public bodies to ensure due regard to the need to advance equality of opportunity; foster good relations between people who share a “protected characteristic” and those who do not and take action to eliminate the potential of discrimination in the provision of services.
- 7..3 Any issues identified through the equality analysis will be given full consideration and agreed mitigating actions will be delivered through the standard contract delivery and reporting mechanisms.

Approved by: Yvonne Okiyo, Equalities Manager

## **8 ENVIRONMENTAL IMPACT**

- 8.1 Any issues emerging in reports to the relevant Cabinet member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

## **9 CRIME AND DISORDER REDUCTION IMPACT**

- 9.1 Any issues emerging in reports to the relevant Cabinet Member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

## **10 DATA PROTECTION IMPLICATIONS**

- 10.1 Will the subject of the report involve the processing of ‘personal data’?

NO

- 10.2 Has a Data Protection Impact Assessment (DPIA) been completed?

NO

Data Protection Impact Assessments has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.

Approved by: Sarah Warman, Director of Commissioning & Procurement.

**CONTACT OFFICER:**

<b>Name:</b>	Stephen Hopkins
<b>Post title:</b>	Head of Commissioning and Procurement (Corporate)
<b>Telephone no:</b>	47499

**BACKGROUND DOCUMENTS:**

The following public background reports are not printed with this agenda, but are available as background documents on the Croydon Council website agenda which can be found via this link [Cabinet agendas](#)

- Housing IT System Extension (OHMS)
- People's IT Systems Implementation - Variation
- Letting of the 2nd floor annex BWH to NHS Property Services
- Letting of unit 7C the Colonnades to K&Z South London Ltd

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<b>REPORT TO:</b>	<b>CABINET 21st OCTOBER 2019</b>
<b>SUBJECT:</b>	<b>Variation to the contract for the provision of a Managed Service for Temporary Agency Resources</b>
<b>LEAD OFFICER:</b>	<b>Jacqueline Harris-Baker, Executive Director of Resources Sarah Warman, Director of Commissioning and Procurement</b>
<b>CABINET MEMBER:</b>	<b>Councillor Simon Hall, Cabinet Member for Finance &amp; Resources</b>
<b>WARDS:</b>	<b>All</b>

**CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON**

Temporary agency workers are an essential part of the Council’s workforce and help to ensure resilient and flexible service delivery. This enables the Council to ensure resources are available to cover short term or specialist requirements and to continue to deliver high quality services and meet the needs of service users.

**AMBITIONS FOR CROYDON and WHY WE ARE DOING THIS:**

The Council relies on its workforce to deliver and manage services to communities, and relies on having access to specialist and temporary agency workers to support the delivery of all outcomes within the Corporate Plan.

This report supports the ambition of taking a prudent approach to managing the Council’s finances and improving value for money for local public services.

To ensure best value for money, there will be a strong emphasis on contract management and internal processes for the final year of the contract, alongside the procurement of a new contract to secure the target operating model for the Council.

**FINANCIAL IMPACT**

The original contract award in 2016 was for the value of £80m over the 4 year term of the contract (3+1). The Council spend has exceeded £80m as it approaches the final 1 year extension, so a variation to the contract award value is required to take into account the increased spend of approximately £135m over the 4 year term of the contract.

There is no specific budget for temporary agency workers. Costs for temporary agency workers are provided for by vacant posts or using project related funds.

**FORWARD PLAN KEY DECISION REFERENCE NO.: 19/16/CAB**

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below.

## **1. RECOMMENDATIONS**

- 1.1 The Cabinet is recommended to approve the increase in spend for the temporary agency workers contract with Adecco for a new maximum contract value of £135,000,000.
- 1.2 The Cabinet to note that the Chair of Contracts and Commissioning Board has approved the one year permitted extension of the contract with Adecco.

## **2. EXECUTIVE SUMMARY**

- 2.1 The London Borough of Croydon entered into a contract with Adecco Ltd on 7<sup>th</sup> November 2016 for a term of 4 years and for an estimated value of £80m.
- 2.2 The contract is a call off from the London Collaborations mini competition which was awarded in July 2016.
- 2.3 The original contract award to Adecco was approved by Cabinet on 11/07/16 (ref: A83/16).
- 2.4 It is to be noted that the original award to Adecco was for approximately £80m over the term of the contract, and this amount has been exceeded as the final years extension is due to be activated. The year's extension has been approved by the Chair of Contracts and Commissioning Board subject to approval of the extra expenditure by Cabinet recommended in this report.
- 2.5 Since the start of the contract, there has been significant focus on ensuring that all of the council's temporary staff are resourced through the contract with Adecco. This has improved controls on spend and enabled the reporting of a more accurate figure of the councils total spend on temporary staffing. This has resulted in a higher reported spend because at the time of the contract award there was a proportion of off-contract spend.
- 2.6 The council has increased spend on temporary staffing in certain areas, most noticeably in children's social care. This is in part due to the additional staffing requirements as a result of the Ofsted inspection, but also because of the difficulty of permanent recruitment across the children's social care sector.
- 2.7 The council has explored options for the optimum operating model which would bring the different resourcing elements of the council together to ensure that the correct resourcing route is followed by Hiring Managers. This model will be enabled through the MSTAR 3 framework by introducing emerging technology within the temporary resourcing market such as talent pools.



- 2.8 The contract with Adecco and spend on agency staffing is monitored monthly, and internal agency challenge sessions have been introduced for services to justify agency spend and to demonstrate plans for reducing agency usage.
- 2.9 The council has also introduced new internal controls with Executive Director authorisation now required for recruitment of both temporary and permanent staffing, to ensure that the correct and appropriate resourcing route is followed.
- 2.10 This report is asking for a variation in contract value for the final year of the contract.
- 2.11 The content of this report has been endorsed by the Contracts and Commissioning Board.

<b>CCB ref. number</b>	<b>CCB Approval Date</b>
<b>CCB1516/19-20</b>	<b>27/09/2019</b>

### 3. DETAIL

3.1 There is a corporate requirement to engage temporary workers for a number of reasons, such as:

- to cover for vacancies pending permanent recruitment
- to cover for absence when a return date is unknown (e.g. long term sickness)
- to cover for absence when a return date can only be estimated (e.g. maternity)
- to deliver short-term project work where a resource is either needed immediately, is too specialist to secure through the councils recruitment team or is too short-term to consider a permanent or fixed term contract.

3.2 Since the award of the contract, the Council's annual spend on temporary agency workers has increased from an estimated amount of £20m per annum to £30m - £40m per annum. There are a number reasons for this increase, including the following:

Cost:

- an annual increase in cost of living payments
- an increase in interim rates driven by competition amongst local authorities (particularly in social care markets)

Demand:

- an increase in the number of short term capital projects delivered by the council that do not require a permanent resource
- difficulty in recruiting permanent staff to particular roles, such as social workers
- results of the Ofsted inspection prompting an urgent additional resource requirement, alongside increased demand for social workers across local authorities, particularly within London.

- an increase in the council insourcing of services, such as grounds maintenance, that require an element of agency provision as part of the workforce

#### Management information

- Improvement in management controls since the award of the contract has resulted in 100% of the agency spend correctly captured. This has distorted the annual spend comparison because not all agency spend was originally correctly classified as such.
- 3.3 The increase in contract value represents over 50% of the originally estimated contract value. There is a risk that this may be considered outside of the scope of modifications to regulated contracts permitted to be implemented by Regulation 72 of PCR 2015 without requiring a further procurement procedure. However, it is considered there is minimal risk of challenge as the original contract was called off from an OJEU compliant framework, neither the contract term nor type of services are being extended/varied, and the original contract value was estimated.
- 3.4 Whilst there is a significant increase in spend for the reasons given above, the Managed Service Provider (MSP) element of the contract with Adecco offers good value for money. LB Croydon have joined the London Collaborations in collectively calling off from the ESPO MSTAR2 (Managed Services for Temporary Agency Resources 2) contract and so benefit from the economies of scale in the provision of the payroll service and over 200 agencies within the supply chain. This MSP fee does not increase with the extension of the contract.
- 3.5 During the extension period the council will complete a procurement strategy for the future contractual arrangements with a view to achieving the optimum temporary resourcing operating model for the council.
- 3.6 The council has to date already explored the different options for an optimum operating model, namely a fully external model, a fully internal model and a hybrid of the two. It has been concluded that the hybrid model is optimal in terms of price and quality, and also allowing the council to retain greater control of the service delivery. The route to market for this will be developed during the extension period.
- 3.7 The optimum operating model would also bring together the different resourcing elements of the council, and to introduce new controls and processes to ensure that the appropriate resourcing route is followed and temporary resourcing is not a default response to a vacancy.
- 3.8 This new model will also explore how to prioritise employment opportunities for local residents by incorporating Croydon Works within the approach to resourcing.
- 3.9 The extension period will allow the Council to test these elements of the optimum operating model before it enters into new contractual agreements. This includes:

- the sourcing of the majority of roles by Adecco and its supply chain with the exception of specialist roles in social care and executive interim
- focusing on a contract management approach and monitoring of Key Performance Indicators such as role fill rates and supply chain management
- controls on resourcing, including permanent and temporary resourcing functions with tighter controls on recruitment
- trialling how Croydon Works could support local residents into employment

3.10 The council will look to reduce spend on temporary staffing as part of the controls put in place as listed above.

#### 4. CONSULTATION

4.1 No consultation is required as the extension award is within the original scope of contracted services.

#### 5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 There is no specific budget for temporary agency workers. Costs for temporary agency workers are provided for by vacant posts or using project-related funds. The figures below set out incurred spend and the anticipated spend for the final year of the contract:

Year	Expenditure
November 2016/2017	£24,000,000
November 2017/2018	£30,800,000
November 2018/2019	£38,345,000 (estimated)
November 2019/2020 (extension period)	£42,000,000 (estimated)

##### 5.2 The effect of the decision

The effect of the decision will be to vary the amount of the contract award with Adecco, as it enters the final year of the contract. The contract management approach will be reviewed to ensure that the council is receiving best value. This includes implementing internal processes and recruitment controls to prevent unnecessary usage of agency staff where permanent staff can be recruited.

##### 5.3 Risks

There is a financial risk that the cost of agency staff will exceed available budgets. This needs to be managed within existing departmental staffing budgets.

#### 5.4 **Options**

No other options are being considered at this time. There are other providers in the market for a Managed Service Provider, but it is considered that the council already has the best contract in place for this in terms of cost.

#### 5.5 **Future savings/efficiencies**

The contract in itself is already delivering at low margins and provides good value for money. Further savings and efficiencies will not necessarily come from the contract itself, but a change in approach to the wider resourcing of the council to reduce the reliance on agency staff.

The Council's will continue to manage the contract throughout the extension period to manage the performance of Adecco and seek any further efficiencies and cost reduction.

Approved by: Ian Geary, Head of Finance. Resources & Accountancy

### **6. LEGAL CONSIDERATIONS**

- 6.1 The Director of Law notes that the legal considerations are as set out in this report.

Approved by: Sean Murphy, Director of Law and Deputy Monitoring Officer

### **7. HUMAN RESOURCES IMPACT**

- 7.1 There are no immediate HR issues arising from this report for Croydon Council employees.

- 7.2 The use of agency staff will continue to be reviewed through internal mechanisms and processes, including Agency Challenge meetings, to ensure the appropriate scrutiny where agency staff are engaged or extended.

Approved by: Gillian Bevan, Head of HR Resources, on behalf of the Director of Human Resources

### **8. EQUALITIES IMPACT**

- 8.1 An initial EIA was completed for the original contract award and showed that the award of the contract was not likely to have an adverse impact on any protected group and as such a full analysis was not required.

Approved by: Yvonne Okiyo, Equalities Manager

### **9. ENVIRONMENTAL IMPACT**

- 9.1 There are no environmental impacts arising from this report.

**10. CRIME AND DISORDER REDUCTION IMPACT**

10.1 There are no crime and disorder considerations arising from this report.

**11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

11.1 The recommendation set out in 1.1 and 1.2 will ensure that the Council continues to have a flexible and resilient workforce whilst the council develops its future resourcing requirements.

**12. OPTIONS CONSIDERED AND REJECTED**

12.1 No other options are being considered at this time.

**13. DATA PROTECTION IMPLICATIONS**

13.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**YES**

Adecco and the associated supply chain will process and hold personal data for each of their workers as the worker is directly employed by them. This includes information regarding personal contact details and bank details which are stored and processed in line with GDPR regulations.

13.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**NO**

As this is an extension to an existing contract, there are already contract schedules in place with the supplier regarding the handling of personal data.

Approved by: Sarah Warman, Director of Commissioning and Procurement

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**CONTACT OFFICER:**

<b>Name:</b>	Scott Funnell
<b>Post title:</b>	C&P Head of Service for Place & Resources
<b>Telephone number:</b>	61641

**BACKGROUND DOCUMENTS:** None

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