

# Proposed Site Allocations – Technical Note

## 1. Introduction

- 1.1 This technical note aims to set out the methods behind the identification, site-specific details and phasing of proposed site allocations in the Croydon Local Plan Review: Issues and Options (2019).
- 1.2 These approaches are in line with those set out in the National Planning Policy Framework (2019) and the adopted London Plan (2015), with guidance from the emerging New London Plan.

## 2. Source of Sites

- 2.1 The Council has assessed possible proposal sites in the borough. The proposed sites were identified from the following sources:
  - Existing site allocations in the adopted Croydon Local Plan (2018), that have not yet begun construction;
  - A Call for Sites exercise that took place between June and July 2019;
  - The Strategic Housing Land Availability Assessment prepared by the Mayor of London in October 2017;
  - Planning permissions and current records of pre-application advice; and
  - Council officers, using local and specific knowledge of sites with potential for development.

## 3. Housing Numbers and Determining Site Capacity

- 3.1 For each proposed site in the Croydon Local Plan Review: Issues and Options (2019), a numerical range of housing units is provided. This is calculated using the current London Plan's density matrix, a Greater London Authority (GLA) metric which generates a minimum and maximum housing number based on a number of site-specific factors including the PTAL (Public Transport Accessibility level), the site's character setting and the site size. Although the density matrix is not included within the draft London Plan (which anticipates higher densities in new development), it remains a useful proxy to estimate the potential housing capacity of sites.
- 3.2 It is important to note that this range is indicative, and that the actual number of homes which may come forward on site will be based on, amongst other factors, the design and viability of a scheme, and will be subject to scrutiny through the development management (planning application) process. The capacity of many sites will be towards the upper end of the housing range. Some sites in highly accessible locations may provide more homes than indicated by the housing range.
- 3.3 The emerging London Plan says that the number of units on site should be determined through a design-led process. More detailed work on the capacity of housing sites will be carried out as part of the preparation of the draft Local Plan review. The draft Local Plan review is due to be published in autumn 2020.

- 3.4 For those sites with planning permission, the allocation in the Plan states the number of permitted homes according to the latest planning application.

## 4. Sites Proposed Uses

- 4.1 The Council 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. As well as tackling the causes of climate change in the borough, Croydon has a need for new homes (including affordable homes). It is however acknowledged that not all sites, new or existing, are suitable for residential development.

### *Town Centre Uses*

- 4.2 Paragraph 85 of the NPPF (2019) is clear that planning policies should “*allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed*”, and that “*residential development often plays an important role in ensuring the vitality of centres*”.
- 4.3 In assessing sites, the Council has continued its approach to the promotion of town centre uses such as retail, leisure and community uses, in the borough’s defined town centres including Central Croydon in order to ensure their vitality and viability. As town centre uses outside of these defined boundaries would require a sequential test, to demonstrate that such uses cannot be accommodated within a town centre or edge of centre location, they have not been included within the Issues and Options consultation with the following exceptions. Sites which have an extant planning permission for a town centre use outside of a town centre have been included in the Issues and Options consultation including all the uses that have planning permission. Also on some sites that have an existing town centre use outside of a town centre, a like for like replacement is proposed as this would not require a sequential test.

### *Retaining Existing (and Protected) Uses*

- 4.4 There is a need to retain existing uses on some sites, particularly if they are protected uses. An example of this is the retention of offices (B1) in the Office Retention Area in Central Croydon; proposed allocations may refer to mixed-use developments where a variety of land-uses including offices, residential and retail or hotel can be accommodated on the same site.

### *Schools*

- 4.5 As identified in the Infrastructure Delivery Plan and Development Infrastructure Funding Study, there is an outstanding and future need for schools throughout the Plan period. There are a number of existing site allocations brought forward from the Croydon Local Plan (2018) which are for schools throughout the borough.
- 4.6 Further, using the information in the Development Infrastructure Funding Study which identifies areas of demand for pupil places, the Council has been able to identify those sites which may be most preferable for a new school premises.

### *Existing Allocations and Sites with Planning Permission*

- 4.7 The proposed use of an existing site allocation (from the adopted Croydon Local Plan 2018) may have been updated to reflect the most up-to-date information from pre-application discussions.
- 4.8 The proposed use of a site with planning permission reflects the latest consent granted.

## 5. Phasing of Sites

5.1 Paragraph 73 of the National Planning Policy Framework (2019) states that:

*Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.*

5.2 In relation to the identification of land for homes, Paragraph 67 states:

*Planning policies should identify a supply of:*

- a) Specific, deliverable sites for years one to five of the plan period; and*
- b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan*

5.3 The Council has identified sites for development as well as an indicative phase for their development, based on the most up-to-date information from landowners, developers and existing planning permissions.