

1. DETAILS OF THE DEVELOPMENT

Ref: 18/05474/PRE
Location: Woburn and Bedford Court, Wellesley Road, Croydon
Ward: Fairfield
Description: To demolish the existing buildings and erect a development to provide 464 residential units (Use Class C3), with 1,761sqm of flexible floor space (Use Classes E / F1 and Sui Generis) at ground and first floor, public realm, communal amenity and child play space, together with associated wheelchair accessible vehicle parking and cycle parking.
Applicant: Ivel Limited
Agent: James Owens, Rapleys
Case Officer: Chris Stacey

2. PROCEDURAL NOTE

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre-application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent applications, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 The report covers the following points:
- Executive Summary
 - Site Briefing
 - Place Review Panel Feedback
 - Summary of Matters for Consideration
 - Specific Feedback Requested

3. EXECUTIVE SUMMARY

- 3.1 The scheme has so far been developed through extensive pre-application engagement with officers. The scheme has most recently been considered by the Place Review Panel (PRP) on 15th June 2023 and their views are covered in section 5.

- 3.2 Discussions so far have focused on the principle of the development, the scale/height/massing, the design approach, impact on the streetscape and heritage assets (including the Wellesley Road North Conservation Area), impact on the skyline from longer range views, landscaping and public realm, impacts on neighbouring buildings (in terms of light/outlook/privacy etc.) and transportation matters. Discussions are ongoing in relation to these matters and with regards to affordable housing provision, and technical matters such as microclimate issues. Due to its height the proposed development is referable to the Greater London Authority (GLA). The applicants have had pre-application discussions with officers of the GLA most recently on the 01st August 2023 (with an LBC officer in attendance). Officers are awaiting the formal response from the GLA.
- 3.3 It is anticipated that a single full planning application will be submitted to cover the whole site.

4. SITE BRIEFING

Site and Surroundings

- 4.1 The application site (generally level and circa 1 ha in site area) is located at the northern end of Wellesley Road at its junction with Newgate at the northern edge of the Croydon Opportunity Area. The site is bounded to the west by Wellesley Road, to the north by Newgate, the 'Island' development and Tavistock Court, to the east by Tavistock Road, The Elms and St Mary's secondary school, and to the south by The Elms, St Mary's secondary school and 76 Wellesley Road. It is approximately 400m from West Croydon Rail Station, 900m from East Croydon Rail Station and 300m from the edge of the Primary Shopping Area. It should be noted that the site boundary includes a circa 8.5m wide strip of land fronting Wellesley Road which is not currently in the applicant's control and is Council owned land.
- 4.2 The existing Woburn and Bedford Court complex, constructed in the 1960s/1970s, comprises of 8 low rise residential blocks of either 3 or 4 storeys in height housing a total of 80 maisonettes and flats as well as 8 single storey garage blocks, along with extensive areas of hardstanding, used for car parking and vehicular access, and soft landscaping. There are a total of 90 car parking spaces currently on the site. Vehicular access to the site is either currently from Wellesley Road or Tavistock Road. The existing buildings on site are generally in a poor state of repair and are reaching the end of their lifespan with the site also suffering from considerable levels of anti-social behaviour including drug dealing and fly tipping.
- 4.3 The surrounding area is highly mixed in character and predominantly comprises of either residential or community uses. Whilst notable landmarks including the 'Island' development, which rises to 21 storeys, and the Saffron Square development, which rises to 44 storeys, sit in close proximity to the site, the majority of buildings within the immediate context of the site are 3-4 storeys in height, many of which form part of the Wellesley Road North Conservation Area

which extends along the western side of Wellesley Road, directly opposite the site, and adjoins the site on its south side.

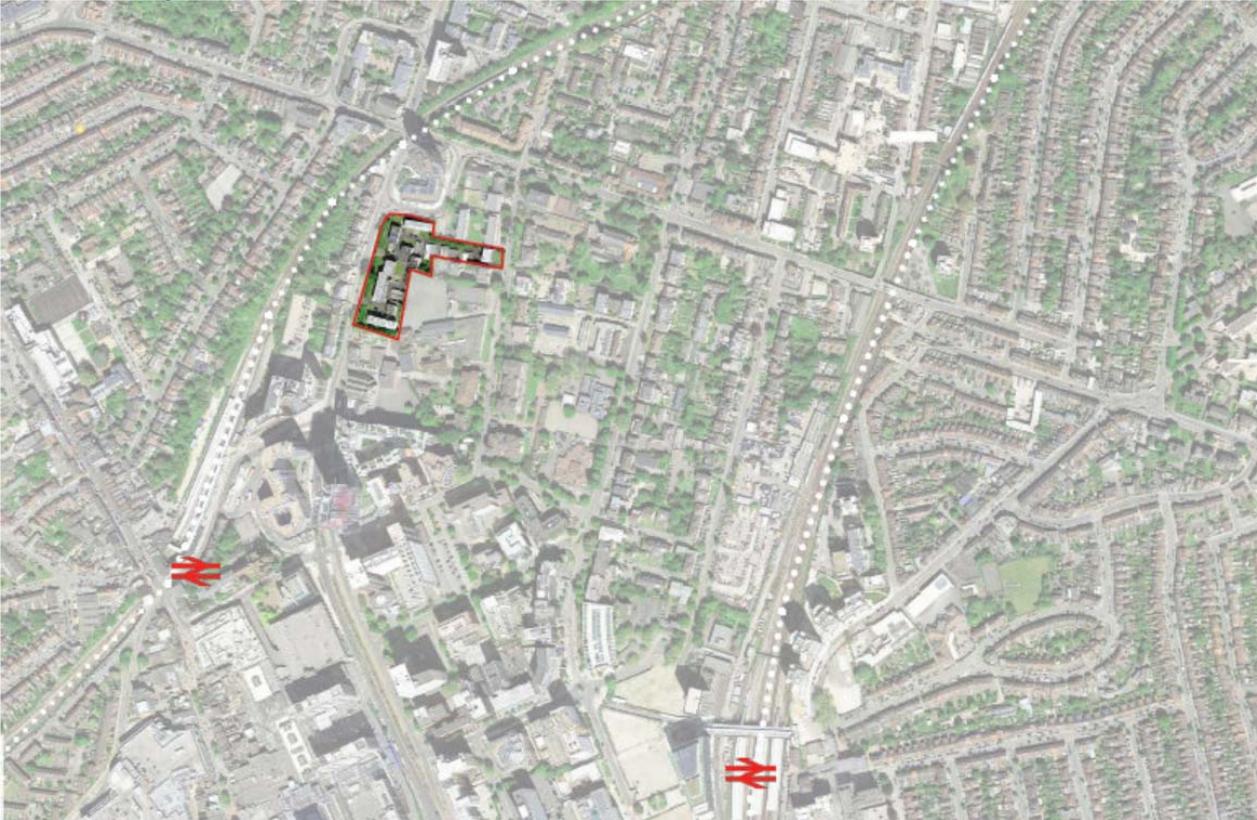


Figure 1: Site location plan

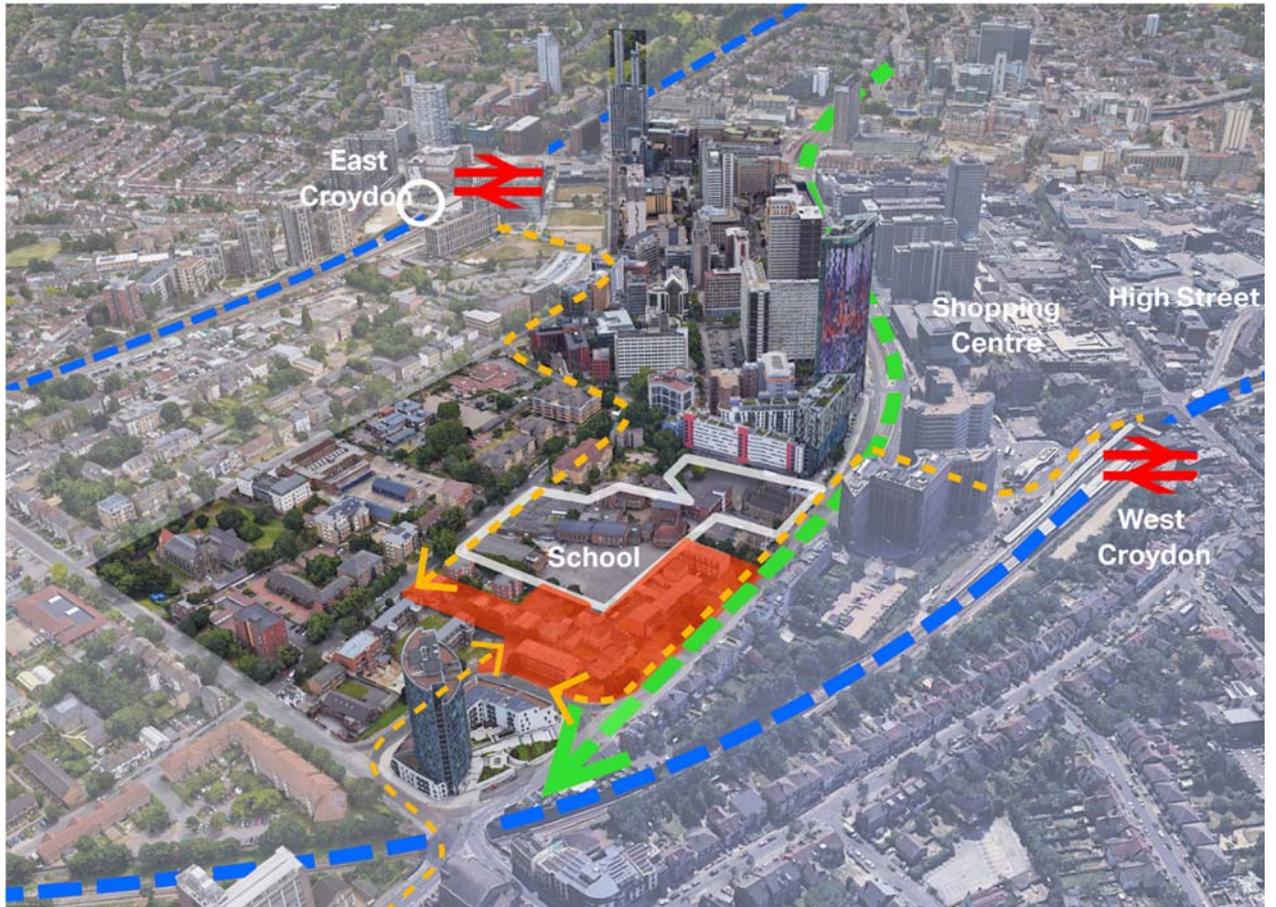


Figure 2: Aerial view of site (highlighted in red)



Figure 3: Existing buildings on site (viewed from Wellesley Road)

Designations

4.4 The following designations apply to the site:

- The site is located within the Croydon Opportunity Area (COA).
- The site is not allocated within the current Croydon Local Plan (2018).

- The site sits within the 'Outer' area as defined by the Croydon Local Plan (2018) and Croydon Opportunity Area Planning Framework (COAPF) where there is 'no tall building policy'.
- Whilst the site itself does not sit within a designated conservation area, and none of the existing buildings on the site are subject to any heritage designations, the site does sit adjacent to the Wellesley Road North Conservation Area which covers the area directly to the south of the site and that on the opposite side of Wellesley Road (see green hatch in Figure 4). Whilst none of the buildings within said conservation area are statutory listed, St Mary's Church is locally listed. Further afield however are the Grade I listed Church of St Michael and All Angels and the Grade II* listed Church of St James.
- The site has excellent Public Transport Accessibility (PTAL 6b), being in close proximity to East and West Croydon Stations and numerous bus and tram links.
- All the roads around the site are within the 'East Outer' Controlled Parking Zone.
- Wellesley Road, which passes to the front of the site, forms part of the 'Strategic Road Network'.
- The site is in Flood Zone 1 however parts of the site are at risk of surface water flooding.

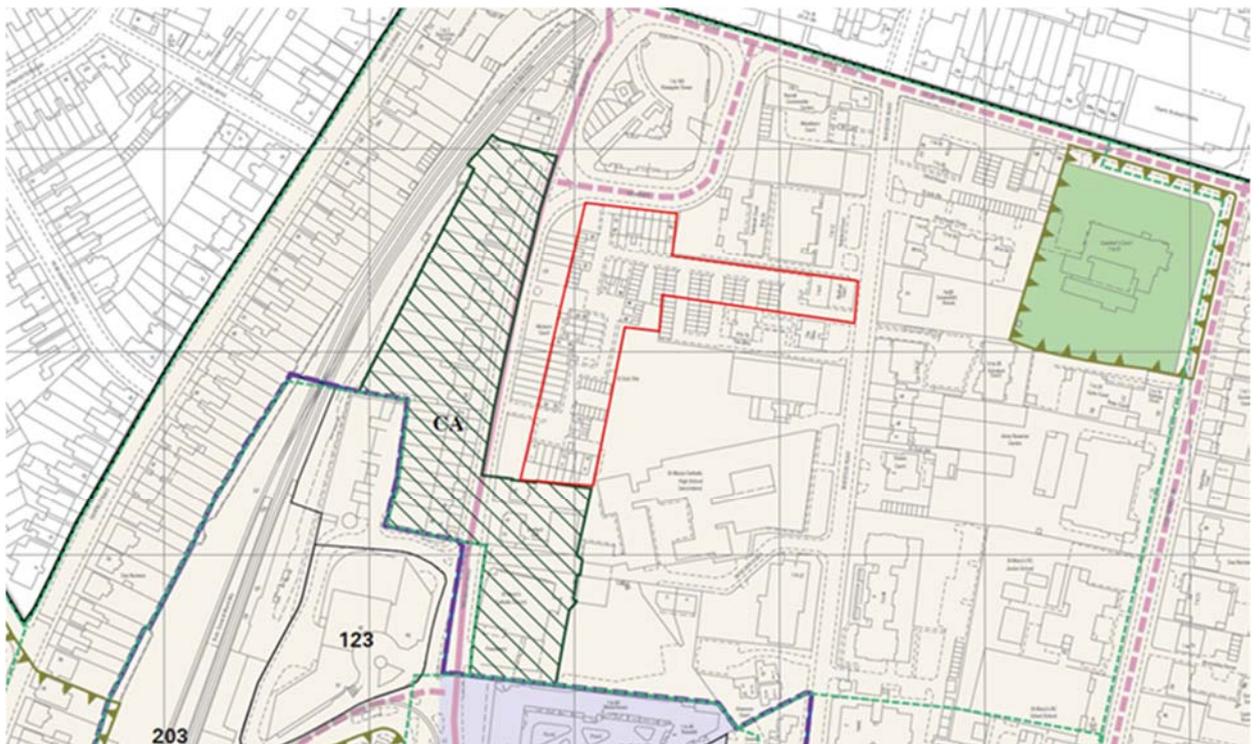


Figure 4: Extract from policies map (current Croydon Local Plan (2018)) – red line denotes applicant's ownership.

4.5 The Council is currently in the process of partially reviewing the Croydon Local Plan which is expected to be consulted on in early 2024. It should be noted that as was the case in the previously consulted on Regulation 19 version of the Croydon Local Plan Review, it is anticipated that this site will form part of a site

allocation within said document (see Figure 5). Given the stage that the partial review is currently at the below allocation at this point in time has very limited weight.

133: Woburn and Bedford Court

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2AE	1.14ha	Various low rise residential blocks and associated parking and amenity land	Central	High	Medium rise blocks with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Additional residential development		Residential development will help to meet the need for new homes in the borough.			Post 2032	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	Up to 505

Figure 5: Extract from the Local Plan Review - site allocation

Relevant Planning History

4.6 The following planning applications on the site are relevant to this scheme:

19/03746/ENVS: Environmental Impact Assessment (EIA) Scoping Opinion Request for a mixed use residential and commercial development comprising of up to 600 residential units and 1000sqm of flexible community/commercial uses – EIA Scope Approved 20.09.2019.

4.7 The following planning applications on neighbouring sites are relevant to this scheme:

Tavistock Court:

20/02630/FUL: Erection of 3 storey building on western car park area to provide 6 dwellings with associated landscaping/works – Permission Granted 26.03.2021.

Proposal

4.8 The proposal has been significantly amended during the course of on-going discussions. The current proposal (known as ‘Option 1’) is for the following:

- Demolition of the existing buildings.
- Erection of four buildings, Block 1 would be 32 storeys, Block 2 would be 26 storeys, Block 3 would be 13 storeys and Block 4 would be 4-7 storeys.
- Provision of 464 flats, including for sale and affordable housing.
- 1,761sqm of flexible floor space (Use Classes E / F1 and Sui Generis) at ground and first floor.
- Provision of extensive public realm in the form of a new public square, new east-west link and improvements fronting Wellesley Road.

- A new landscaped space in place of the current garaging to the adjacent 'The Elms' site (outside of the red line and subject to agreement with both the Council and third parties).
- 14 blue badge car parking spaces and 1 car club bay.
- Provision of 820 cycle parking spaces.
- Communal outdoor amenity space within the public realm and rooftops.
- Indoor communal space.
- Cycle and refuse storage within the buildings including at basement level.

4.9 Following on from verbal feedback received from the GLA at the most recent meeting on 1st August, coupled with ongoing discussions with officers, the applicant has also sought to test two further variations of the scheme, known as 'Option 2' and 'Option 3' which officers would appreciate seeking members feedback on (this is further detailed in the 'Massing' section of this report). Save for the following deviations said options would generally remain the same as described above:

- Option 2 – Block 1 would be 26 storeys and Block 2 would be 32 storeys.
- Option 3 – Block 1 would be 15 storeys; Block 2 would be 24 storeys and Block 3 would be 30 storeys.

4.10 The current proposed unit mix comprises (there would be minor variations to this in options 2 and 3):

Size	Units	% Mix
1b/2p	218	47%
2b/3p	147	32%
2b/4p	8	2%
3b/4p	8	2%
3b/5p	83	18%



Figure 6: Proposed block plan



Figure 7: Aerial view of proposal



Figure 8: View of proposal looking north along Wellesley Road

5. PLACE REVIEW PANEL FEEDBACK

- 5.1 Whilst earlier iterations of the scheme were presented to PRP, given the extent of changes to the scheme, passage of time since and the fact that the design team has also changed, the below summary only covers the scheme's most recent PRP review which took place on 15th June 2023.



Figure 9: Proposal presented to PRP.

5.2 General Comments

- The Panel noted that the Applicant did not talk about the domestic quality of the homes, and suggested further understanding of what it would be like to live there, such as through interviews with those already living on Wellesley Road.

- The Panel noted that a thorough analysis has been done, but the scheme comes across as rather clinical and lacking soul. The Panel encouraged the Applicant to make the vision more place-specific, as much of it is generic and it noted that there can be a danger of this leading to a generic solution.
- The Panel advised the Applicant to conduct detailed studies on wind, acoustics, and sunlight and to understand their constraints on the ground floor plane.
- The Applicant was encouraged to think about what would happen if Really Local Group pulled out and what the strategy might be to prevent those spaces not just becoming generic office space. The Panel noted that the Applicant needs to be careful about how the affordability of the non-residential spaces are managed to ensure accessibility.

5.3 Landscape, Amenity, and Public Realm

- The Panel noted the need to consider blue roofs, permeability, absorbency, and water management.
- The Panel urged the Applicant to consider what they are giving back to the neighbourhood in terms of amenity and play, taking into consideration there is a school next door and families living in the bigger flats.
- The Panel raised concerns about providing play space on the roof, particularly for older children.
- While the Applicant commented that they are considering putting winter gardens on the lower levels, the Panel noted that it seems better to have them on the upper levels where there are harsher conditions and therefore enable the balconies to be more usable at these levels throughout the year.
- The Panel appreciated having the residential entrances away from the main road.

5.4 Massing and Design

- The Panel enjoyed the detailed design of Block 4 and questioned why that precision and care was not brought to the podium. The Panel noted that the podiums are not as well resolved and suggested incorporating more playfulness/joyfulness and providing more detail in terms of the ground floor plane. The Panel suggested treating the base of the building with more care as this is the experience that most people will have with the building.
- The Panel further expressed reservations about the podium treatment of Block 3 and wondered if it would be better to have more distinction than the two taller buildings. The Panel suggested exploring treating this block as a standalone 'villa' that comes to ground rather than have the same treatment and appearing as a shrunk down version of the taller buildings.
- The Panel noted that the Applicant talked about referencing the urban setting and having an urban response.

- The Panel was not convinced about the usability of balconies, which are likely to be quite windy owing to the height and location by Wellesley Road.
- The Panel commented that the particular section across Block 3 and 76 Wellesley Road does not appear to work and that it seems like it is picking up on a historic street pattern that is no longer there. The Panel noted that there should be a gap between the existing building and Block 3 to ensure the existing building retains the appearance of a 'villa' which is more consistent with the prevailing urban grain.
- The Panel noted that the location of the plant on the northern elevation would be a blank elevation and encouraged the Applicant to think about the pedestrian experience of this on the street.
- The Panel raised concerns with the proposed full height glazing and potential overheating issues this may cause.

5.5 Summary

The Panel recognised that this is a difficult site and are supportive of much of the scheme's strategy, including the height, landscape treatment, and engagement with an operator for the non-residential units. It was also considered that the applicant team had undertaken a very thorough analysis and rigorous review of the site which is to be commended. In summary, the Panel strongly recommends the Applicant to:

- Consider the character of Croydon and the specificity of the site;
- Ensure there is sufficient play space provision and further refine how it is distributed around the site;
- Consider alternatives and adaptability for the ground floor should it not work out with the operator;
- Conduct environmental modelling of wind, acoustics, and air quality;
- Provide a clear sustainability strategy and target Passivhaus standards;
- Tie in Block 3 with the surrounding context more and/or with Block 4;
- Resolve the crown and podium treatments;
- And give more thought on what it would be like to arrive, experience, and live within the scheme.

5.6 Subsequent to the feedback from PRP, the following amendments have been made:

- Removal of the link piece between Block 3 and 76 Wellesley Road.
- Development of the proposed architectural design, most notably regarding the podium fronting Wellesley Road.
- Consideration of different massing options for the 3 tall buildings fronting Wellesley Road.
- Further development of the internal layouts, including the non-residential uses.
- Further development of the landscaping scheme including the child play strategy across the site.

6 SUMMARY OF MATTERS FOR CONSIDERATION

6.1 The main matters for consideration in a future submission are as follows:

- Principle of Development
- Design, Townscape and Heritage
- Impact on Surrounding Occupiers
- Tenure, Mix and Quality of Accommodation
- Access, Parking and Highway Impacts
- Environmental Matters
- Other Matters
- Mitigation

Principle of Development

Residential Development

6.2 The Croydon Local Plan sets a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year. The current housing target is therefore 2,079 homes per annum up to 2029.

6.3 The existing site currently has a total of 80 homes, and it is recognised that many of the existing homes on the site, as well as the site more widely, is in a poor state of repair, with the wider estate suffering from considered anti-social behaviour issues. As such the redevelopment of the site to provide better quality housing is strongly supported. Furthermore, the proposed redevelopment of the site would result in the delivery of 464 homes, representing a net uplift of 384 homes and such a quantum of housing delivery would make a significant contribution towards the Council's housing targets (as outlined above) which alone is a considerable benefit of the proposed scheme. Finally given the fact that the site sits within the Croydon Opportunity Area and has an excellent PTAL of 6b, the site represents a highly sustainable location for the delivery of new homes.

Provision of Flexible Non-Residential Use

6.4 Whilst the site lies within the Croydon Opportunity Area, the site falls outside of the Croydon Metropolitan Centre, however given its close proximity it is deemed to represent an 'edge of centre' location. Policy DM8 of the Croydon Local Plan outlines that subject to the submission of a sequential test which satisfactorily demonstrates that a main town centre use cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or existing vacant units in edge of centre locations, such proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre. Policy DM19 of the Croydon Local Plan states that the Council will support applications for community uses where the proposals are flexible and adaptable, are accessible to town centres, and if proposing a main town centre use are directed towards town centre locations.

6.5 The applicant is proposing a total of 1,761sqm of flexible non-residential floor space both at ground floor level in Block 1 and at ground, first and second floor levels in Block 2. Said proposed use would span various use classes (which includes a mixture of commercial and community orientated uses) and is broken down as follows:

- Use Class E (b, c, d, e, f and g(i)) to cover: Offices (inc. co-working); café/restaurant; professional services; medical services; fitness; crèche; day nursery; and day centre.
- Use Class F1 (a, b, e and f) to cover: Education; display space; exhibition/public hall and worship.
- Sui Generis (a, p, s, t, u, v and x) to cover: Theatre; drinking establishment; live music venue; cinema; concert hall; bingo; and dance hall.

6.6 Given that many of the above uses constitute a 'main town centre' use in line with the NPPF, it will be necessary for the applicant to submit a sequential test as part of any future planning application to ensure compliance with the aforementioned policies. Notwithstanding this requirement however in this circumstance the applicant is already in discussions with a potential tenant called 'The Really Local Group' to take the proposed flexible non-residential floor space in Block 2 (totalling 1,483sqm), and given that the space is being designed with them in mind the applicant is likely to be able to demonstrate that the demand for this element of the non-residential use is locationally specific, thus satisfying a sequential test.

6.7 It does however need to be recognised that there is no guarantee that the 'The Really Local Group' will occupy this space and at present it is not envisaged that permission for this space will be granted in the form of a 'personal permission', and as such any sequential test that is submitted as part of a future planning application will also need to demonstrate that the floor space being proposed is sequentially preferable for the range of uses being proposed. Related to this point further work to demonstrate how this space would work and be adaptable for other occupiers is also required should the currently envisaged tenant not take on this space. Subject to the applicant demonstrating the above no objection to the proposed provision of non-residential uses within the development is raised.

Conclusion

6.8 There is strong support for the redevelopment of this site for an intensified residential development due both to its regenerative benefits and contribution towards the Council's housing targets, and subject to it being suitably demonstrated through a sequential test, the provision of the proposed non-residential uses are also deemed to be acceptable.

Design, Townscape and Heritage

Overall Policy Context

- 6.9 Policies D1, D2, D3, D4 and D8 of the London Plan seek to ensure that development makes the best use of land by following a design-led approach that optimises the capacity of sites, enhances local context by delivering buildings and spaces that positively respond to local distinctiveness, are of a high design quality, and ensure that new public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the historic context, and easy to service and maintain. Policy D9 of the London Plan sets out where tall buildings should be directed to and requires them to address a range of visual impacts and be of an architectural quality and materiality that is of an exemplary standard. Further to the above policies HC1 and HC3 of the London Plan outline that development proposals affecting heritage assets, and their settings, should conserve their significance and ensure locally designated views are suitably protected.
- 6.10 Policies SP4 and DM10 of the Croydon Local Plan require development to be of a high quality which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities, respect the development pattern, scale, massing and appearance of the surrounding area, have high quality architectural detailing and provide landscaped spaces which are visually attractive, easily accessible and safe for all users. Policy DM14 of the Croydon Local Plan requires all major schemes to include public art and policy DM15 of the Croydon Local Plan requires tall buildings to respect and enhance local character, be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale. Policy DM17 of the Croydon Local Plan requires development to enhance Croydon Panoramas and policy DM18 of the Croydon Local Plan requires development to preserve and enhance the character, appearance and setting of heritage assets within the borough. Finally whilst policy DM38 of the Croydon Local Plan requires development within the Croydon Opportunity Area to be undertaken in a cohesive and coordinated manner and sets out policies for the assessment of tall buildings within both the 'Central Area' and 'Edge Area' of the Croydon Opportunity Area, none of the place specific elements of this policy relate to this part of the 'Outer Area' of the Croydon Opportunity Area, with the supporting diagram to this policy outlining that there is no tall building policy in place for this location (see Figure 10).

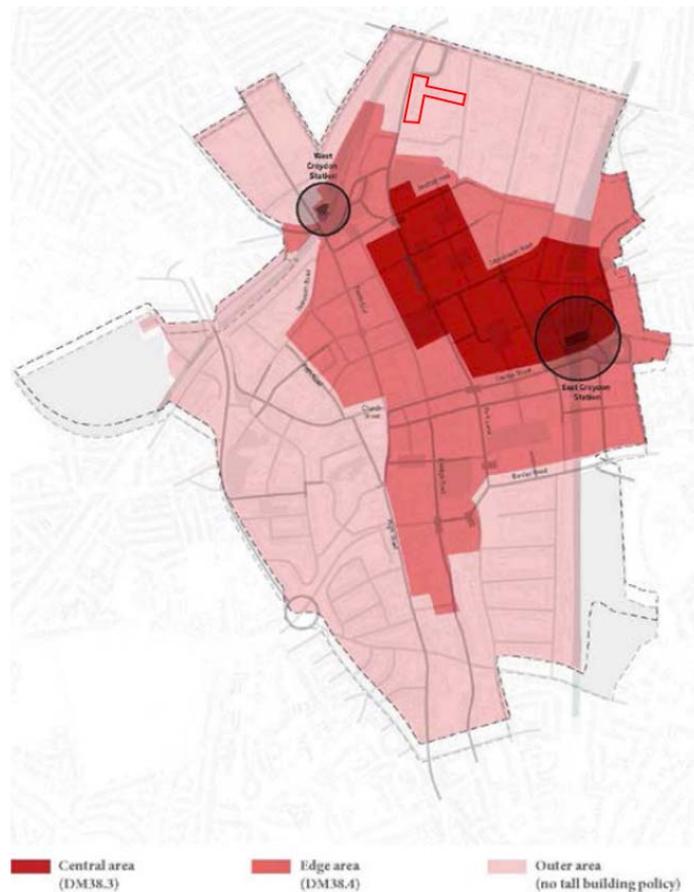


Figure 10: Extract from Croydon Local Plan illustrating the extent of the 'Central Area', 'Edge Area' and 'Outer Area'. The site boundary is also overlaid on this plan.

6.11 The Croydon Opportunity Area Planning Framework sets out a series of aspirations for public realm improvements across the Croydon Opportunity Area and also sets out guidance around building heights and form. Unlike the more recently adopted Croydon Local Plan, guidance surrounding the acceptability for tall buildings within the 'Outer Area' is provided. Whilst this sets out that in general tall buildings are unlikely to be acceptable in the 'Outer Area', the guidance sets out that it is not appropriate to apply a blanket approach to the acceptability (or not) of tall buildings in this area and therefore no exact height or range of heights has been set for this area. Furthermore, the guidance recognises that there are numerous physical and site-specific differences that will require careful consideration on a case-by-case basis to determine an appropriate height at planning application stage. As is elaborated on further in paragraphs 6.17 to 6.23 of this report, in this circumstance it is deemed that the physical and site-specific circumstances of this site (coupled with other material considerations) justify the provision of tall buildings on this site in line with the guidance set out in Croydon Opportunity Area Planning Framework. In respect of the form of tall buildings, it is recommended that they should achieve a slenderness ratio of 1:3, and in order to ensure that they relate well to their surroundings at street level a 'plinth and tower' approach is generally supported. Finally, guidance on how new tall buildings impact on views, both within the Croydon Opportunity Area and from afar, is also provided.

- 6.12 In addition to the above policy position, and given the scheme's potential to impact on a number of surrounding heritage assets, it is necessary in line with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to both the desirability of preserving any surrounding listed buildings or their setting and preserving or enhancing the character or appearance of any surrounding conservation areas.

Site Layout

- 6.13 The proposed layout of the site seeks to provide a total of four buildings, 3 of which (Blocks 1, 2 and 3) would be positioned on the western side of the site fronting Wellesley Road, with the fourth (Block 4) being positioned along the eastern 'arm' of the site extending to Tavistock Road. A new public square would be positioned between Blocks 1 and 2 adjacent to Wellesley Road and would lead through to a new street that connects Tavistock Road to Newgate enabling east-west pedestrian connections between Wellesley Road and Tavistock Road. Blocks 1, 2 and 3 would take the form of towers sitting atop a lower podium, with the front building line of the podium aligning with No's 72-76 Wellesley Road, following the historic building line of Wellesley Road (which the existing buildings currently do not respect), whilst Block 4 would take the form of a linear block flanking the newly proposed street. A turning head leading to an enclosed parking area is provided between Blocks 2 and 3, where these buildings would be serviced from and further limited parking is also proposed at the western end of Block 4 opposite a servicing layby adjacent to Block 1. In addition to the proposed public square, extensive areas of soft landscaping are provided fronting Wellesley Road, along the southern and eastern boundaries of the site to the rear of Blocks 2 and 3, and subject to agreement with both the Council and third parties (discussed elsewhere in this report), on adjacent land within 'The Elms'. Communal amenity and child play space is provided throughout the development both within the landscaping at ground level, at podium level and at roof level to some of the lower buildings. Within the buildings themselves active frontages are provided along the majority of the Wellesley Road frontage, both the north and south sides of the new public square and fronting onto the newly proposed street. Residential entrances to Blocks 1 and 2 would front the new public square, with the entrance to Block 3 being adjacent to Wellesley Road, and multiple building entrances to Block 4 would be positioned both fronting Tavistock Road and the newly proposed street.



Figure 11: Proposed ground floor in context

6.14 In developing the proposed site layout consideration has also been given to how adjacent sites could come forward in the future (notably the adjacent St Mary's Secondary School) and this exercise (see Figure 12) has informed the resultant site layout allowing for additional future north-south connections between Newgate and Woburn Road, as well as a further east-west connection between Wellesley Road and Tavistock Road.

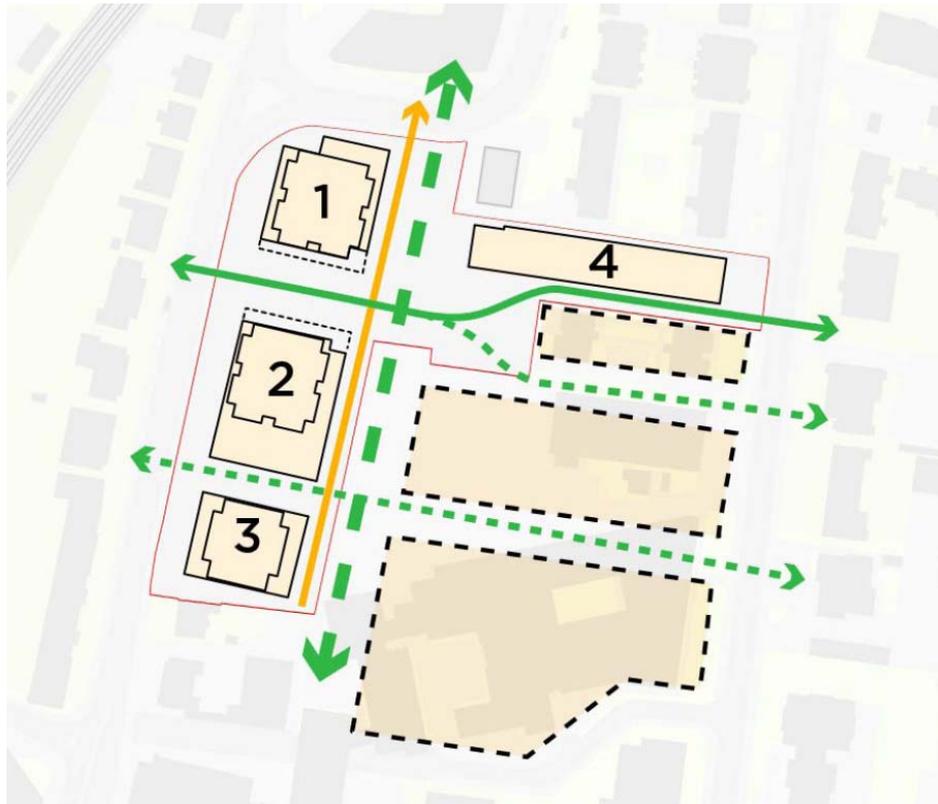


Figure 12: Masterplanning exercise to demonstrate overall strategy to site layout.

- 6.15 Overall officers are of the view that the proposed site layout would respect the general development pattern of the area, in particular reinforcing existing building lines along both Wellesley Road and Tavistock Road, enables the provision of new high quality pedestrian links through what is currently a large urban block, providing more appealing alternatives to the busy streets of St James's Road, Newgate and Wellesley Road, and has been designed in mind of how neighbouring sites could come forward in the future. The provision of a new public square between Blocks 1 and 2 is strongly welcomed given the relative absence of public space within the immediate surroundings, and the general approach to servicing and on-site parking has enabled a design and layout that limits the impacts of vehicle movements across the site. Further work is still required relating to the newly proposed street adjacent to Block 4 to demonstrate that pedestrian movements through this space are suitably prioritised and to ensure that this feels like a welcoming and generous route across the site. Whilst the removal of the podium element between the southern edge of Block 3 and No.76 Wellesley Road is welcomed by officers (as requested by PRP) further interrogation of this space, including any boundary treatment to Wellesley Road, is required to ensure that this space positively contributes towards the street scene.
- 6.16 Given the presence of a basement beneath Blocks 1 and 2, which houses a considerable portion of the 'back of house' facilities for these buildings (such as refuse and cycle stores) a considerable portion of the key facades are freed up to provide active uses, and officers are generally content with the proportion of active frontages provided across the development. It is however noteworthy that

both the north façade of Block 1 (fronting Newgate) and the west façade of Block 3 (fronting Wellesley Road) feature plant and cycle stores respectively and further work to demonstrate that the treatment of these facades presents a suitable condition to the street is still required.

Massing

Current Proposal:

- 6.17 The proposed development seeks to provide four buildings of 32, 26, 13 and 4-7 storeys. In line with both policy DM15 of the Croydon Local Plan and D9 of the London Plan, the proposals seek to provide a series of tall buildings on this site and it is therefore necessary to consider in the first instance the acceptability of the provision of tall buildings on this site.
- 6.18 As has been outlined in the 'Overall Policy Context' section of this report the site sits within the 'Outer' area of the Croydon Opportunity Area. Whilst the Croydon Opportunity Area Planning Framework does not set out a blanket approach to the acceptability (or not) of tall buildings in these locations it instead recognises that there are numerous physical and site specific differences that will require careful consideration on a case-by-case basis to determine an appropriate height at planning application stage, the more recently adopted Croydon Local Plan is in effect silent on the acceptability or otherwise of tall buildings in this location. Policy D9 of the London Plan does not preclude the provision of a tall building in a location that has not otherwise been clearly identified through the Development Plan as being suitable for a tall building so long as compliance with part c) of this policy (which covers visual and heritage impacts, architectural impacts and environmental impacts (amongst other considerations)) of this policy can be demonstrated, a position confirmed through relevant case law (*R (London Borough of Hillingdon) v Mayor of London (Lang J, 15 December 2021)*).
- 6.19 Given the above there is no in principle objection to the provision of tall buildings on this site subject to the impacts of said buildings being acceptable. Whilst officers recognise that the heights proposed are significantly greater than adjacent buildings, officers are mindful that the regeneration of this site (which involves the acquisition of 80 existing homes), whilst providing a decent affordable housing offer alongside a host of public benefits will ultimately necessitate a significant increase in the number of homes on site (a position underpinned by high level viability evidence that has previously been shared with officers and independently verified) and it is therefore important to weight the impacts of the proposed development against the notable benefits of the proposal.
- 6.20 In arranging the massing of the proposed development consideration of the scheme's relationship with the adjacent Wellesley Road North Conservation Area, which sits both opposite and to the south of the site has been had, as well as the site's relationship to its north at the corner of Wellesley Road and Newgate, where the presence of the 'Island' building, coupled with the fact that this junction represents a key gateway into the town centre, presents a potential opportunity for the provision of a landmark building. The more suburban

character of Tavistock Road has also necessitated a different response to this part of the site. When taken together these considerations has led to the development of a stepped series of towers along Wellesley Road, descending in height from Newgate, set behind a 3-storey podium element which seeks to reference the datum of the houses on the opposite side of the road in the conservation area. Block 4 which extends from the proposed public square to Tavistock Road gradually descends in height such that it respects existing neighbouring building heights fronting the street.



Figure 13: View from Newgate looking south.



Figure 14: View from the junction of Tavistock Road and St James's Road

- 6.21 Whilst it is recognised that the proposed massing strategy ultimately results in building heights stepping up away from the town centre (which is a strategy the GLA have raised concerns with), given the various adjacent conditions (as described above) such an approach to massing is deemed to be an appropriate response to the site, a position which PRP concurred with. Extensive views testing of the proposed massing from numerous vantage points around the site (some of which are illustrated in Figures 13 and 14) has been undertaken and officers are of the view that this exercise demonstrates that the proposed approach successfully relates to the varying conditions around the site, with both the stepping down to Tavistock Road and the buildings to the south of the site, coupled with the presence of a podium element fronting Wellesley Road successfully mediating and integrating the proposed tall buildings with their lower rise context. Throughout the pre-application process previous iterations of the scheme have proposed bulkier buildings with larger footprints and in a number of local views this was deemed to result in a proposal that was overbearing and had significant adverse impacts upon townscape. Substantial work has since been undertaken to dramatically reduce the footprint of the proposed buildings, and thus their bulk, which officers consider more meaningfully lessens the impact of the proposals comparative to simply reducing building heights (which would further negatively impact upon their relative slenderness). Officers are now of the view that the overall slenderness of the tall buildings proposed is acceptable and provides an elegant form, that subject to high quality architectural detailing will result in a positive addition to the wider townscape.
- 6.22 In respect of the absolute heights of the proposed development (32, 26, 13 and 4-7 storeys), as has been previously cited high level viability testing (which has been independently verified) has been undertaken to demonstrate that such a quantum of development is necessary to both unlock the site for development, whilst also providing the quantum of affordable housing proposed coupled with the other public benefits associated with the development, and it is the view of officers that the current massing presents a suitable balance between heights and bulk and officers are therefore accepting of the proposed heights on this site. It is also noteworthy that following on from the most recent PRP review on 15th June 2023, the Panel concluded that they were supportive of the proposed heights.

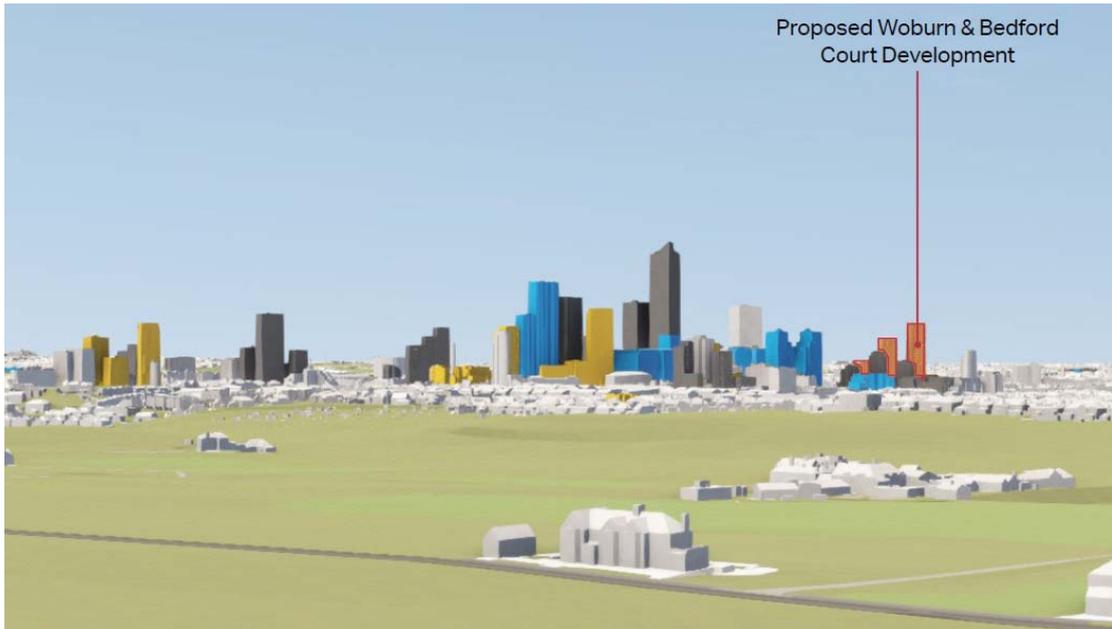


Figure 15: View from Addington Hills

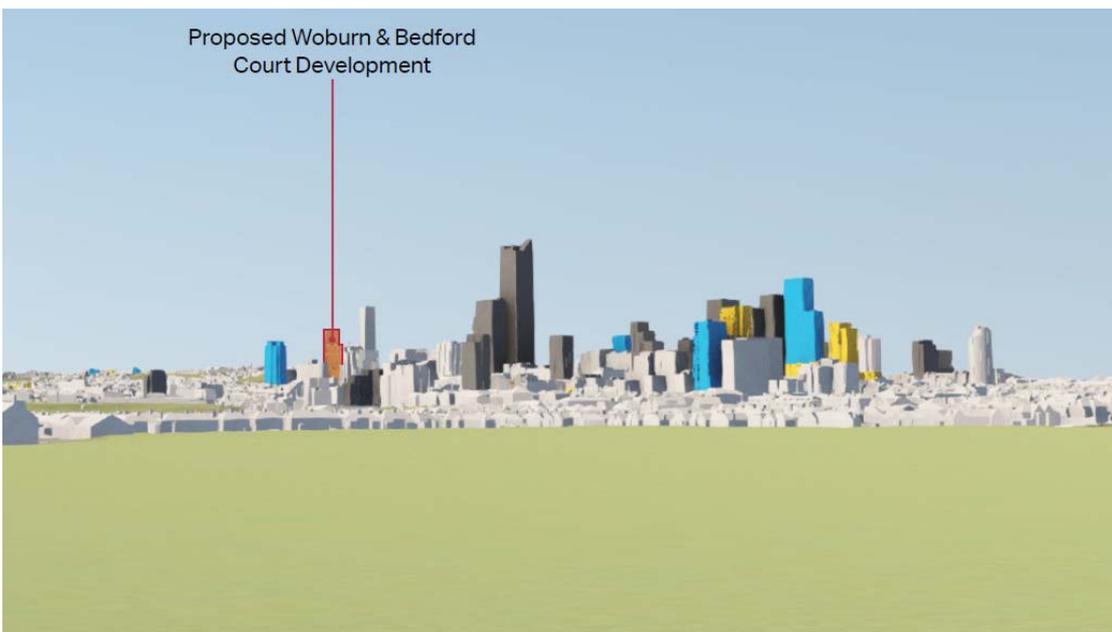


Figure 16: View from Purley Way Playing Fields

6.23 In addition to testing the proposed massing strategy in a number of immediate and local views, wider views testing of the proposed scheme has also been undertaken including from a number of designated 'Croydon Panoramas' (some of which are illustrated in Figures 15 and 16). From an initial analysis of these views, officers are content that the proposed massing would complement the existing tall building cluster of the Croydon Opportunity Area and maintains a step down from the taller buildings within the 'Central' portion of the Croydon Opportunity Area when viewed from these more distant views.

Alternative Massing Options:

6.24 As detailed in paragraph 4.9 of this report following on from verbal feedback received from the GLA at the most recent meeting on 1st August, coupled with ongoing discussions with officers, the applicant has also sought to test two further variations of the scheme's massing, known as 'Option 2' and 'Option 3' which, in addition to the currently proposed massing, officers would appreciate seeking members feedback on. Said options would deviate from the currently proposed massing in the following ways:

- Option 2 – Block 1 would be 26 storeys and Block 2 would be 32 storeys.
- Option 3 – Block 1 would be 15 storeys, Block 2 would be 24 storeys and Block 3 would be 30 storeys.

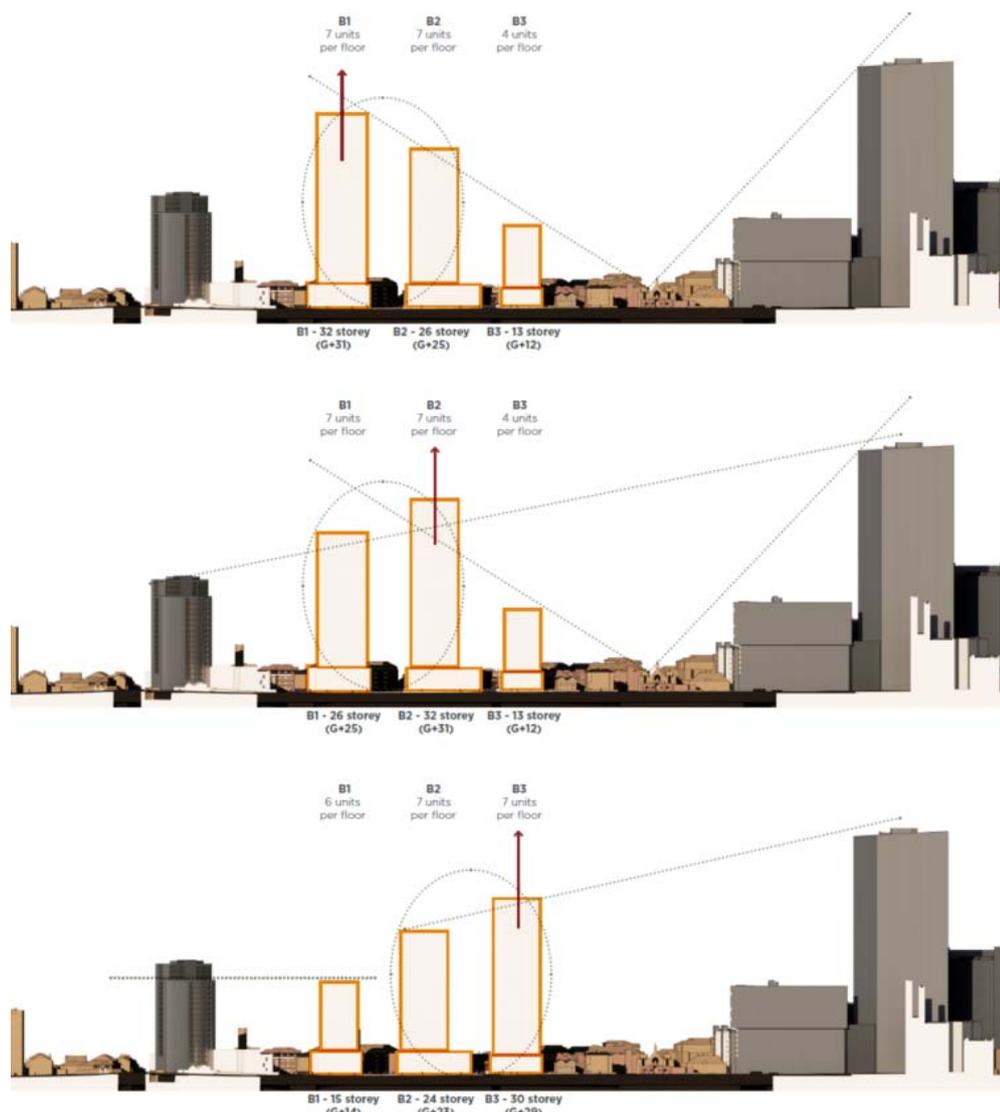


Figure 17: Proposal fronting Wellesley Road in context (Option 1 top, Option 2 middle and Option 3 bottom)

6.25 The first alternative option tested ('Option 2') simply seeks to switch Blocks 1 and 2 around, such that the tallest element of the proposal would sit in the centre of the site as opposed to at its northern end at the junction of Wellesley Road and Newgate. In this option the heights of Blocks 3 and 4 would remain the same,

and in respect of Block 3, its relationship with the buildings directly to its south (which sit within the Wellesley Road North Conservation Area) would remain unchanged. Whilst a tall building would still be proposed on the corner of Wellesley Road and Newgate, the differential between Block 1 in this option and the 'Island' building would be less stark.

- 6.26 Officers have undertaken an initial review of this option which in effect seeks to take on board the views of the GLA, whilst maintaining a similar relationship between the proposal and the buildings directly to the south in the conservation area (which has been a key driver of the currently proposed massing). Based on the views provided to date, officers consider that this option has a number of benefits comparative to both the currently proposed scheme and 'Option 3' and subject to the views of Members are likely to suggest the applicant proceeds with this arrangement as opposed to the currently proposed scheme. From wider views this option clearly steps heights up towards the town centre and transitions well to the 'Island' building to the north. It also creates a more interesting step in heights across the site as it is the only option which doesn't have a continuous graduation in height (which could potentially be argued is an arbitrary and contrived response). In immediate street views, and by virtue of placing the tallest building in the centre of the site, the development has a less stark relationship with its surroundings when viewed from the north, and when viewed from the south, maintaining the height of Block 3 at 13 storeys enables the development to continue to provide a meaningful mediation to the conservation area to the south which the Council's conservation officer supports. It should be noted that at this stage, beyond initial views testing this option has not been tested further and will necessitate further testing to ascertain whether the impacts of this option are acceptable (such as from a daylight and sunlight perspective).

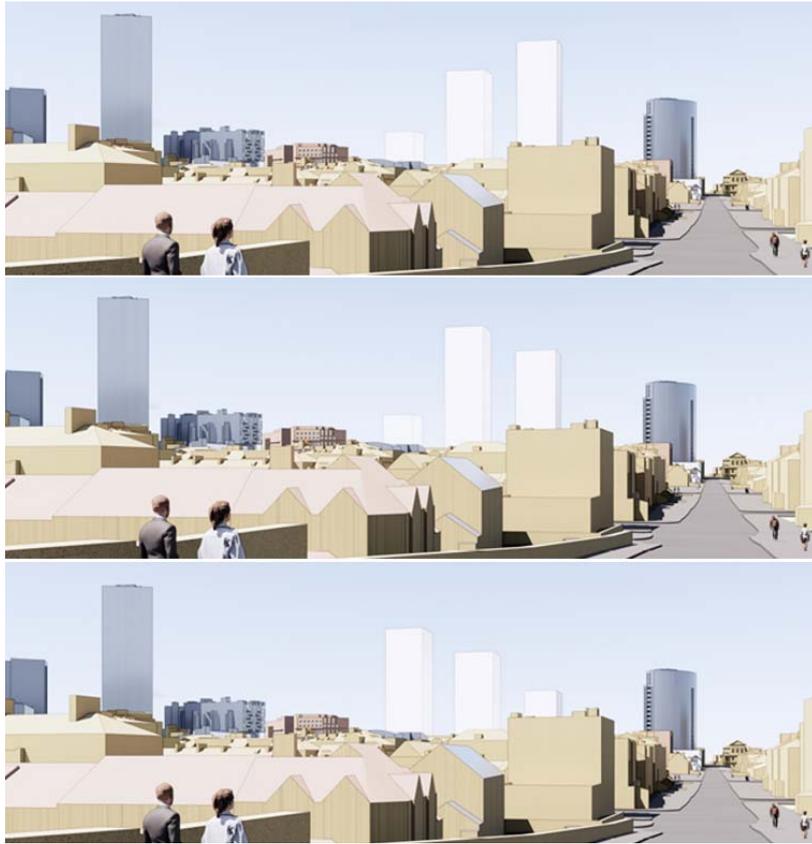


Figure 18: View from Windmill Bridge (Option 1 top, Option 2 middle and Option 3 bottom)

6.27 In respect of 'Option 3' this option seeks to in effect flip the massing of Blocks 1, 2 and 3, such that there is a clear graduation of heights towards the town centre, with the absolute heights of these three buildings also being revised. Block 1 adjacent to the junction of Wellesley Road and Newgate would substantially reduce in height such that it would be 15 storeys, whilst Block 2 would marginally reduce in height to 24 storeys. Block 3 at the southern end of the site directly adjacent to the conservation area would significantly rise in height to 30 storeys.



Figure 19: View of Option 3 looking north along Wellesley Road



Figure 20: View from the junction of St James's Road and Sydenham Road (with St James's Church in the foreground) of Option 3

6.28 Officers have also undertaken an initial review of this option which more literally takes on board the views of the GLA, and whilst in wider range views this scheme provides a clear stepping up to the town centre, officers have significant concerns with aspects of this approach. Through flipping the heights such that Block 3 becomes the tallest building, the relationship between the buildings in the conservation area directly to the south of the site and the scheme becomes excessively stark and uncomfortable (see Figure 19) and is of concern to the Council's conservation officer. When viewed from the junction of St James's Road and Sydenham Road this massing option clearly interrupts the silhouette of the tower of St James's Church which is Grade II* listed which is deemed harmful to this heritage asset and again is of concern to the Council's conservation officer. Furthermore, unlike 'Option 2' which strays away from a more arbitrary and contrived graduation in heights, this option would maintain

such an approach, with the deviation away from this deemed to be positive feature of 'Option 2'. Again, this option is yet to be tested further to ascertain whether the impacts of this are acceptable (such as from a daylight and sunlight perspective), however shifting heights further southwards (with lower buildings to the north) could potentially be problematic from a daylight and sunlight perspective in respect of the internal quality of the proposed flats.

- 6.29 Taking into account the above brief assessment officers are keen to understand members views on the proposed alternative massing options, and whether members have a clear preference for any of these options comparative to the currently proposed massing.

Architectural Expression

- 6.30 Given that the proposed development includes the provision of three tall buildings the design of the scheme is expected to be of an exceptional quality. Whilst the architectural expression of the scheme has been developed since the scheme's review by PRP in June 2023, this aspect of the scheme is still very much work in progress and still requires further development in order to meet the calibre that is necessary to gain officers' full support. The current design is borne out of extensive contextual analysis and seeks, in a contemporary manner, to respond to the materiality and rhythm present on buildings within the adjacent conservation area. It is currently proposed to treat Blocks 1, 2 and 4 in a similar palette of warm reds and pinks, whilst Block 3 would contrast with the other buildings through the use of yellow tones similar to those used extensively in the adjacent conservation area. In respect of the manner in which buildings are grouped through a similar architectural treatment, officers are still yet to be convinced as to whether this current strategy is appropriate, and what degree of differentiation is appropriate between varying blocks (in part to prevent an unacceptable degree of coalescence). Officers would welcome Members input on this aspect of the design.





Figure 21: Contextual elevation of proposals fronting Wellesley Road (top) and contextual elevation of Blocks 1 and 4 (bottom)

6.31 In respect of the manner in which the facades to the buildings are treated a clear base, middle and top has been expressed, with the podium element (which wraps around all four facades) acting as the base for Blocks 1, 2 and 3, and expressed double storey townhouses to the base of Block 4 clearly denoting the base of this building. Blocks 1, 2 and 3 have expressed crowns, with Block 3's being of a smaller and more subtle design to reflect its relative smaller scale. The middle portions of Blocks 1 and 2 feature a clearly defined grid accentuating their verticality with horizontal elements at 4 storey intervals, whilst thicker vertical elements and a more subtle horizontal expression is applied to Block 3. Whilst a consistent grid (referencing the post war character of Croydon) is applied across all facades, through the use of fins, balconies and varied glazing sizes, variations to each façade to respond to their orientation (taking into account environmental factors such as daylight/sunlight and overheating) are proposed. Overall whilst officers consider that the general strategy of the façade design is successful and creates well-ordered elegant buildings that respond to their environmental conditions, there is concern that the resultant design in its current form appears somewhat generic and further development to ensure that the scheme has a suitable degree of individuality that is clearly relevant to its immediate context is required.



Figure 22: Close up views of the proposed façade design

6.32 Whilst the materiality of the scheme is still very much in development, the use of some or all of a mixture of brickwork, pre-cast panels and terracotta panels is likely to form the palette of materials for the scheme. Subject to the appropriate use of these materials across the scheme, officers are generally supportive of the palette of materials proposed. The colour tones for the aforementioned materials currently proposed are a mixture of reds and pinks and yellows which pick up on the brick colours used both in the adjacent conservation area and the area more widely. Whilst officers still have reservations over whether the manner in which these colours have been applied across the scheme is appropriate, in principle the colour tones proposed are generally supported and subject to their appropriate application should tie the scheme into its surrounding context. Officers welcome the views of Members in respect of the proposed material palette that is currently being proposed.



Figure 23: View of the current podium design to the base of Block 2

6.33 A critical element of the scheme's design, and an element where substantial time and focus has been directed towards is the podium element fronting Wellesley Road. Whilst officers are supportive of both the principle of its inclusion and its overall scale and form, its architectural expression is still being developed. The current expression of this element (as illustrated in Figure 23) includes a clearly ordered fenestration pattern which reflects that present on many of the buildings opposite Wellesley Road within the conservation area along with the use of red brick and white and pink pre-cast panels. Whilst the order in which windows and openings are expressed, coupled with the use of red brick (yellow brick to the podium of Block 3) seek to reference the buildings in the conservation area opposite, more contemporary detailing such as angled facets at ground and first floor and moulded pre-cast panels to the top of the podium have also been employed to both reference the post war character of Croydon and ensure that the podium element is not simply a pastiche of buildings within the conservation area. Whilst officers have reservations over aspects of the current design, officers are of the view that the current approach of clearly referencing the conservation area, whilst at the same time proposing a more contemporary design aesthetic is the right approach. Given the importance of this element of the scheme and the role it plays in mediating between the character of the conservation area and the scale of the development proposed on this site officers would welcome any views that Members have on this aspect of the scheme.



Figure 24: View of Block 4 looking west towards Block 1

6.34 The element of the scheme which is the most developed in terms of its architectural expression is Block 4 which features a series of two-storey townhouses at its base which are clearly visually expressed and a tiered brick clad top with subtle expressed horizontal banding at each floor. Subject to further refinement officers are generally of the view that the design of this building would respond well to the character of Tavistock Road (where low-rise red brick apartment buildings are common) whilst transitioning to the larger scale elements of the development fronting Wellesley Road.

6.35 Given the stage at which the overall architectural expression of the scheme is currently at officers would welcome Members views on the approach taken thus far and any elements that are deemed to be particularly successful or not.

Landscaping and Public Realm

6.36 Comparative to the architectural expression of the proposals, the landscaping design is relatively well developed and overall has the support of officers and was well received by PRP. Extensive areas of landscaping and public realm are proposed across the scheme, including the provision of a new public square between Blocks 1 and 2, the provision of an east-west pedestrian route through the site, an enhanced frontage to Wellesley Road (including land between the applicant's ownership and the highway which is in Council ownership), a new landscaped space in place of the existing garaging to the rear of The Elms (which is outside of the applicant's ownership and subject to agreement with both the Council and third parties and the subject of ongoing discussions), alongside extensive areas of communal gardens, terraces and roof top spaces which would also feature extensive areas of child play space.



Figure 25: Illustrative landscaping masterplan



Figure 26: Proposed public square between Blocks 1 and 2

6.37 The proposed new public square which would be sited between Blocks 1 and 2 would be considerable in size measuring 24m in width and over 30m in length. A mixture of hard and soft landscaping would be proposed in this space, and areas for sitting and child play would be provided throughout the space. Rain gardens in pebble like forms are proposed alongside extensive new tree planting and a lighting strategy for the space, including the provision of lighting integrated into planter edges, has also been developed. Overall officers consider that the design

of this space is of a very high standard and that this space would be an asset to both the development itself and the wider area. The proposed square would create a welcoming entrance to the site and would lead through to a new street that would enable east-west pedestrian links between Wellesley Road and Tavistock Road. Further development of the landscaping, particularly at the point where pedestrians would cross the new street between Blocks 1 and 4, along the length of Block 4 and adjacent to the site's eastern entrance on Tavistock Road is required to ensure that the full length of this route represents a high-quality experience for pedestrians.



Figure 27: Close up view of proposed landscaping scheme adjacent to Block 2

- 6.38 The current frontage of the site to Wellesley Road features a deep strip of soft landscaping housing a number of substantial mature trees which is partly within the applicant's ownership and partly within the Council's ownership and is the legacy of former post war plans to widen this stretch of road as part of the incomplete Croydon inner ring road. Whilst the proposed development seeks to bring the building line forward comparative to the existing buildings on site, there would still be a considerable strip of landscaping between the development and the street, and it is proposed to retain the majority of the existing trees within this space and plant a considerable number of new trees. Alongside this scheme the Council is currently in the process of exploring highway improvements to this stretch of Wellesley Road which this scheme would stitch into and are likely to involve the realignment of the eastern pavement to this stretch of Wellesley Road, potentially sitting behind a deep verge. Given the inter-relationship between this scheme and the Council's own plans, this element of the landscape design is still subject to further development and change however officers are content that the direction of travel of the design would result in a considerable betterment to the public realm along this stretch of Wellesley Road.
- 6.39 Adjacent to the eastern edge of the proposed square and south of the newly proposed east-west street sits a series of garage blocks to the rear of The Elms. Whilst outside of the applicant's ownership and in Council ownership, given the current condition of many of these garages and the fact that like the application

site itself, this area attracts anti-social behaviour, the applicant is keen to explore the possibility of including this within the proposals and re-landscaping this space to include an additional area of landscaping. Whilst officers are supportive of the principle of this aspect of the scheme, its ultimate delivery will be dependent on securing the agreement of the both the Council (as freeholder and in some cases leaseholder) as well as other third-party leasehold interests. Discussions with said interests are currently ongoing and should agreement with all parties be reached, then the re-landscaping of this space would be proposed. Given the uncertainty regarding the delivery of this element of the scheme, it should be noted that the requirements for the delivery of both communal amenity and child play space across the scheme are not reliant on the delivery of this additional space.

- 6.40 In addition to the above publically accessible spaces, extensive additional areas of landscaping which would be solely accessible to future residents of the development are also proposed, principally to the east of Blocks 2 and 3, to the south of Block 3, atop the podium to Blocks 2 and 3, and at roof level to Blocks 3 and 4. These spaces include a mixture of communal amenity spaces, child play areas and habitat areas, feature substantial new tree and shrub planting, and would provide a series of high quality more private spaces for future residents which would complement the publically accessible spaces provided across the development. Further discussion regarding the extent and quality of the child play space provision across the development is detailed later in this report in the 'Quality' section.
- 6.41 It should be noted that the landscaping design has been developed in a manner to ensure that it could successfully knit into adjacent sites should they come forward which is welcomed, however officers still consider that the current treatment to the area rear of the new square requires further development to ensure that it could more seamlessly accommodate a new north-south pedestrian link (between Newgate and Woburn Road) should the adjacent St Mary's School site be redeveloped in the future.
- 6.42 A public art strategy will need to be developed as part of any future submission and the earlier that this is considered the more successful it will be. Given the extent of publically accessible landscaping that is proposed across the scheme there are numerous opportunities for its inclusion and officers will seek to work with the applicant team to develop a strategy which is informed by Croydon and its diverse communities (including through engagement with the community) as the scheme develops further.

Heritage

- 6.43 Whilst the application site itself is not located within a designated conservation area, nor are any of the existing buildings on site either statutorily or locally listed, the Wellesley Road North Conservation Area directly borders the site to both its south and west, and other heritage assets sit within the wider context of the site including the Grade II* listed St James's Church, the Grade I listed St Michael's and All Angels Church and the Central Croydon Conservation Area. Extensive views testing of the proposals has been undertaken to date to ascertain the

impacts of the proposal on the aforementioned heritage assets, which has highlighted that the principal impacts would concern both the Wellesley Road North Conservation Area and the Grade II* listed St James's Church.



Figure 28: View of proposal looking north along Wellesley Road

6.44 In respect of the proposals impacts upon the Wellesley Road North Conservation Area, which includes the locally listed St Mary's Church, it is recognised that the proposed development will notably alter the setting of this heritage asset. Whilst the scheme proposes a scale of development that represents a notable step change comparative to that of buildings contained within the conservation area, the overall massing of the scheme has been designed to mediate between these conditions, notably through the provision of a 3 storey podium element fronting Wellesley Road (which respects the height datum of the buildings on the opposite side of Wellesley Road and the historic building line on the east side of Wellesley Road) and through stepping building heights down towards the south adjacent to the boundary with the conservation area. Whilst these key moves do not disguise the presence of tall buildings within the scheme, they do nonetheless seek to relate and knit the development into its context, which arguably the existing buildings on the site fail to successfully do. Furthermore it should be recognised that the context of the existing conservation area already features a number of existing taller and larger buildings including Saffron Square, the 'Island' building and Interchange House, and whilst the proposed development would have a closer adjacency to the conservation area comparative to these, the presence of further tall buildings in close proximity to the conservation area is not in this particular circumstance deemed to be an inappropriate or incompatible addition that could not be outweighed by suitable public benefits, and subject to an appropriate design has the potential to create an acceptable relationship.

Notwithstanding the above it is nonetheless recognised that there will be a degree of harm resulting from the proposed development upon the setting of the Wellesley Road North Conservation Area which is likely to be concluded as being less than substantial.



Figure 29: View from the junction of St James's Road and Sydenham Road (with St James's Church in the foreground)

- 6.45 As illustrated in Figure 29 the proposed development would be visible against the backdrop of the Grade II* listed St James's Church which sits at the junction of St James's Road and Sydenham Road. In addition to the strategy for stepping heights down towards the south ensuring a better relationship to the conservation area which abuts the site, this strategy also seeks to respect the setting of St James's Church as well. Whilst Blocks 1 and 2 are clearly visible to the right-hand side of St James's Church, the lower height of Block 3 ensures that the majority of the silhouette of the tower of the church remains uninterrupted. Whilst it is recognised that there will be a degree of harm resulting from the proposed development upon the setting of the Grade II* listed St James's Church it is considered that such harm would be less than substantial.
- 6.46 In line with paragraph 202 of the NPPF, where less than substantial harm to a heritage asset is deemed to be caused by a proposal, it is necessary to weigh any harm caused against the public benefits that can be attributed to the proposals. In this circumstance the proposed development would deliver a wide range of public benefits which include: the delivery of a substantial quantum of housing (including affordable housing); the provision of a new public square; the provision of a new pedestrian east-west link between Wellesley Road and Tavistock Road; and public realm improvements to the frontage of the site along Wellesley Road. When combined officers are satisfied that there is a case to be made that the public benefits of the proposed development would outweigh the harm that would be caused to both the setting of the Wellesley Road North Conservation Area and the Grade II* listed St James's Church.

Conclusion

6.47 Overall officers are generally content with the overall direction of travel of the scheme, and it is considered that the layout, scale and massing, architectural expression, landscaping and public realm, and heritage impacts of the proposals are broadly acceptable subject to further development, in particular relating to the architectural expression of the scheme. Notwithstanding this position however officers are keen to understand the views of Members on the design of the scheme thus far.

Impact on Surrounding Occupiers

- 6.48 Policy DM10.6 of the Croydon Local Plan states that proposals for development will need to ensure that the amenity of the occupiers of adjoining buildings are protected; and that they do not result in direct overlooking of neighbouring properties nor result in significant loss of existing sunlight or daylight levels for adjoining occupiers.
- 6.49 There are a number of adjacent properties to the application site which have the potential to be impacted by the proposed development. Those which are likely to be most significantly impacted include (in a clockwise direction from north of the site): the 'Island' building; Tavistock Court; Cavendish House; The Elms; St Mary's School; No. 76 Wellesley Road; and No's 51-99 Wellesley Road.
- 6.50 In respect of any impact upon outlook or loss of privacy, for a number of the aforementioned properties (namely the 'Island' building, Cavendish House and No's 51-99 Wellesley Road) the separation distances between them and the proposed development are in excess of 18m and are therefore unlikely to be impacted to such a degree that would cause unacceptable impacts. In respect of the remaining neighbouring buildings which sit closer to the proposed development, for Tavistock Court (including the new terrace of 6 homes) there are only south facing windows at ground floor and roof level within the two original blocks, with the majority of these windows being secondary windows, and for The Elms whilst there are a number of north facing windows these all serve non-habitable rooms. Whilst there would be a degree of overlooking of the outside space to St Mary's School, given the 8m distance from the closest windows to the site boundary, coupled with the size and nature of this space, any overlooking that would result from the development is not deemed to be of an unacceptable nature. Finally in respect of the relationship between the proposed development and No.76 Wellesley Road, this property does not feature any north facing windows.

Tenure

- 6.54 Policies SP2.4 and SP2.5 of the Croydon Local Plan seek to negotiate up to 50% affordable housing, subject to viability with a tenure mix of 60/40 in favour of affordable rented homes to intermediate homes, and also require a minimum provision of affordable housing to be provided, preferably in the first instance as a minimum level of 30% affordable housing on-site. Policies H4, H5 and H6 in the more recently adopted London Plan set out a strategic target for 50% of all new homes to be genuinely affordable, set out a threshold approach for major development proposals, where schemes providing a minimum of 35% affordable housing can follow the 'Fast Track Route' whereby they are not required to submit viability information (subject to meeting a number of other specified criteria), and set out a tenure split requirement (within the affordable element of a proposal) which requires a minimum of 30% of said homes to be low-cost rented homes, a minimum of 30% of said homes to be intermediate products which meet the definition of genuinely affordable housing, with the remaining 40% of said homes to be determined by the borough as low-cost rented or intermediate products based on identified need.
- 6.55 The proposals currently seek to provide a total of 163 affordable homes, representing 35% of the overall housing provision within the development by units and 37% of the overall housing provision by habitable room. Within said provision 30% of the affordable housing would be provided in the form of London Affordable Rent housing, with the remaining 70% of the affordable housing being provided in the form of Shared Ownership housing. The current breakdown of the affordable housing provision within the scheme is provided below in Figure 31 (this may be subject to slight variations in options 2 and 3). It is currently envisaged that the entirety of Block 4 will provide London Affordable Rent housing alongside some provision in the lower portion of Block 3, and Shared Ownership housing will be provided across Blocks 2 and 3.

Tenure	Size	Units
London Affordable Rent	1b/2p	23
	2b/3p	2
	2b/4p	7
	3b/4p	8
	3b/5p	9
Shared Ownership	1b/2p	45
	2b/3p	38
	3b/5p	31

Figure 31: Breakdown of current affordable housing provision

- 6.56 Based on the current affordable housing position, whilst the proposed split would broadly accord with that outlined in policy H6 of the London Plan, given that the Croydon Local Plan requires a split of 60/40 in favour of affordable rented homes to intermediate homes, which the proposal does not accord with, the proposal in its current form would need to be viability tested. As mentioned previously in this report, to date the applicant has undertaken high level viability testing of the

scheme which has been subject to an independent review by external consultants appointed by the Council. Said review concluded that despite the aforementioned position the scheme is not viable to deliver any affordable housing, however nonetheless the applicant's position remains that they are committed to delivering such an affordable housing offer. As part of the overall planning balance, officers considered it imperative that this scheme brings forward a good affordable housing offer (in part to justify the quantum of development being sought for this site), and given the sizeable number of affordable homes proposed, the viability position, alongside widely acknowledged challenging market conditions, officers consider that the current affordable housing position is a notable benefit of the scheme that weighs substantially in its favour. Whilst it is recognised that a large portion of the affordable housing offer is in the form of an intermediate product (Shared Ownership), to date officers have taken the view that achieving the overall quantum of affordable housing proposed (37%) is critical. Should members be of a different view (i.e. that the proportion of affordable housing should feature a higher quantum of London Affordable Rent housing instead), given the current viability position it needs to be recognised that this would notably impact upon the headline figure of overall affordable housing provision across the scheme. As the scheme progresses, and as part of any future planning application, officers will seek to secure the maximum level of affordable housing delivery on the scheme.

Mix

- 6.57 Policy SP2.7 of the Croydon Local Plan seeks to ensure that a choice of homes is available to address the boroughs need for homes of different sizes and sets a strategic target for 30% of all new homes up to 2036 to have 3 or more bedrooms. Policy DM1.1 of the Croydon Local Plan sets out a minimum provision of 3-bedroom homes to be provided on individual sites of 10 or more homes, dependent on the setting and PTAL of the site, in order to deliver the overall strategic target required by policy SP2.7, recognising that more central locations with higher density development will not be so compatible for accommodating larger homes. Within 'Central' locations which have a PTAL of 4 and above (which this site falls within) the requirement for new developments is for a minimum of 20% 3-bedroom or larger homes. The current proposals seek to provide a total of 20% 3-bedroom homes across the scheme which would accord with this policy requirement.

Quality

- 6.58 Policy D6 of the London Plan states that housing development should be of high-quality design and sets out a range of quantitative and qualitative aspects that new housing should comply with, including minimum internal space standards which are reflective of the Nationally Described Space Standards (NDSS) as well as minimum private external space standards. Policy S4 of the London Plan states that residential developments should incorporate good-quality, accessible play provision for all ages of at least 10sqm per child. Policies DM10.4 and DM10.5 of the Croydon Local Plan require new residential development to provide private amenity space that is of high-quality design, a minimum of 10sqm

per child of new play space, as well as high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive. Furthermore, policy DM10.6 (d) of the Croydon Local Plan requires proposals for development to ensure that they provide adequate sunlight and daylight to potential future occupants.

- 6.59 Officers understand that all of the proposed homes would either meet or exceed the NDSS and also benefit from private external amenity spaces that are in accordance with the requirements of policy DM10.4 of the Croydon Local Plan. Within both Blocks 1 and 2 residential homes would be accessed via a single core (served by two staircases) and there would be up to 7 homes per floor. In Block 3 a single core (again served by two staircases) would serve up to 6 homes per floor, and in Block 4 two separate cores would serve up to 9 homes per floor, many of which would be accessed via an external deck. The majority of homes proposed across the development would be dual aspect and where single aspect homes are proposed these would be either east, west or south facing. There are no single aspect north facing homes proposed. Officers are content that all of the proposed homes would benefit from good levels of outlook and where homes do face each other separation distances of at least 18m have been proposed to ensure that the privacy of these homes are not compromised. Where homes front onto the public realm or communal amenity areas suitable setbacks to allow for the provision of soft landscaping have been proposed to ensure adequate privacy is provided to the affected homes. Based on the plans provided to date officers are generally content that the proposed layouts will ensure a good standard of accommodation will be provided across the development for future occupiers.
- 6.60 To date officers have not been provided with a daylight and sunlight assessment which assesses the homes within the proposed development itself nor has an overheating assessment been provided. Such assessments will however be required as part of the application to demonstrate that these aspects of the development are acceptable. It is however recognised that the façade design for the building has been designed to be responsive to its relevant orientation such that these considerations are being hard wired into the fabric of the scheme, i.e. minimising internal solar gains, whilst maximising daylight transmission for occupant wellbeing.
- 6.61 In respect of the communal aspects of the proposal all of the proposed communal entrances to buildings are well located, legible and of a suitable scale to enable a welcoming arrival experience for building users and whilst many of the internal corridors do not benefit from access to natural light, given the scale and layout of the internal corridors and the fact that in the instances where this occurs none of the affected cores serve more than 8 homes per floor these shared circulation spaces are deemed to be comfortable and fit for purpose. Communal amenity provision is provided across the development at ground floor level externally, at roof level to Blocks 3 and 4, and internally on the lower levels of Block 1. Child play space is provided throughout the landscaping at ground level, at podium level in Block 2 and on the lower roof levels of Block 4 (see Figure 32). A total of 1,235sqm of child play space is provided for across the development for all age groups which accords with the GLA's child yield calculations for this

development. An assessment of the levels of sunlight that would be achieved at ground floor across the public realm has been provided and this demonstrates that the majority (over 95%) of this space would benefit from at least 2 hours of sunlight on the 21st March (in accordance with BRE guidelines).

LANDSCAPE STRATEGIES
PLAY PROVISION

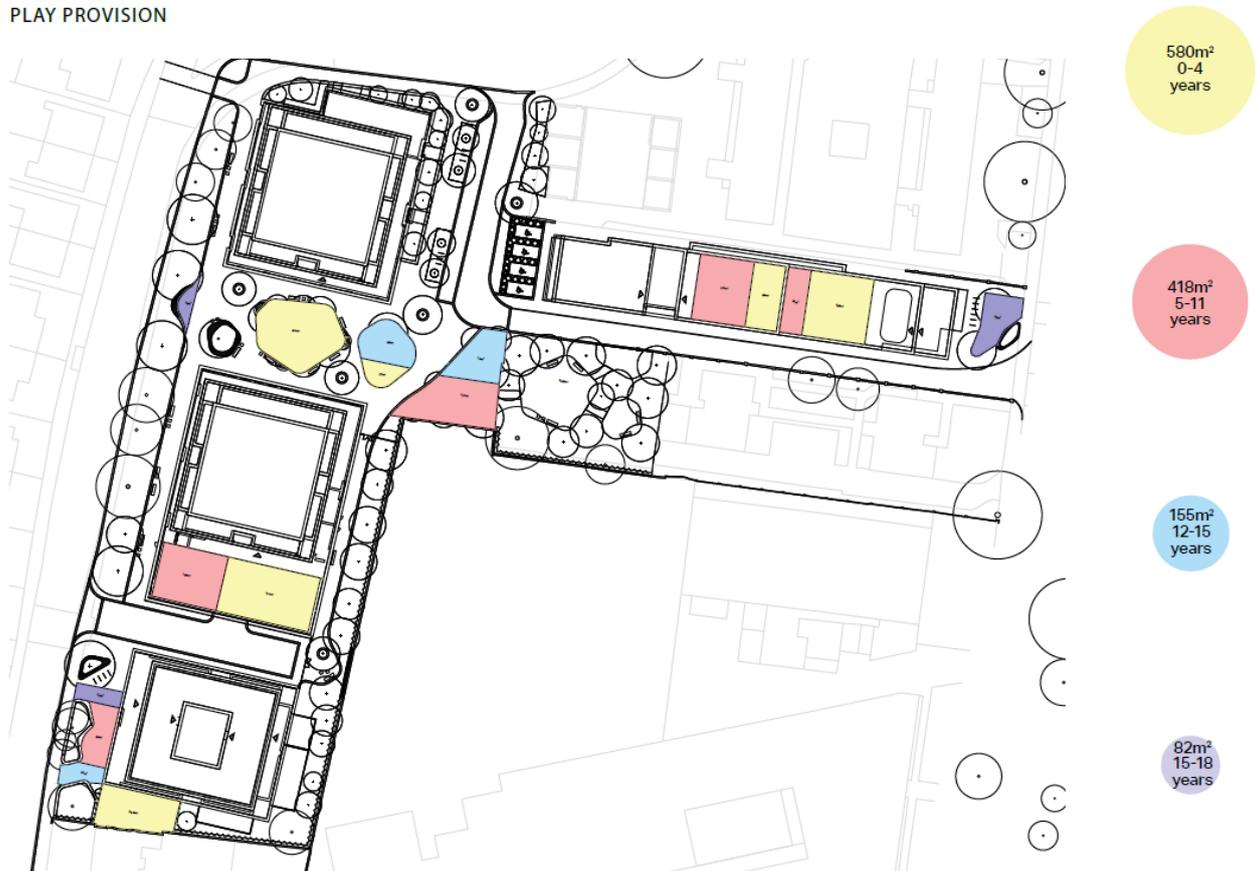


Figure 32: Playspace provision

6.62 Policy D7 of the London Plan states that at least 10% of new dwellings shall meet Building Regulation requirement M4(3) 'wheelchair user dwellings', with all remaining new dwellings meeting Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Of the 464 homes proposed a total of 47 of these have been designed as M4(3) 'wheelchair user dwellings', with the remaining 417 homes having been designed as M4(2) 'accessible and adaptable dwellings'.

6.63 The applicant is aware that policy D5 of the London Plan requires the provision of a fire evacuation lift within each core, and that a fire statement will be required as part of any future planning submission in order to demonstrate compliance with policy D12 of the London Plan. The applicant has advised officers that the current scheme is being designed to meet current fire regulations, including Planning Gateway One, and includes the provision of two stair cores to all 4 buildings. As part of any future planning application the Health and Safety Executive will be a formal consultee and will assess the proposals to ensure compliance with Planning Gateway One.

6.64 Given the adjacency of the proposed development to Wellesley Road which forms part of the 'Strategic Road Network' and a busy route in and out of the town centre, the impacts of noise and air quality on residential amenity will need to be considered. As part of any future planning application the applicant will need to demonstrate how internal areas and external areas achieve suitable levels of comfort in this regard which may include the provision of winter gardens in place of balconies.

Access, Parking and Highway Impacts

Overall Policy Context

6.65 Policies T1, T2, T3 and T4 of the London Plan seek to ensure that development proposals facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 and deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, support capacity, connectivity and other improvements to the bus network, and ensure that impacts on the capacity of the transport network, including cumulative impacts of development, are fully assessed with mitigations through improvements or financial contributions. Policies T5, T6, T6.1, T6.3 and T6.5 of the London Plan seek to ensure that a suitable quantum and quality of car and cycle parking provision is provided within developments, including suitable provision of disabled persons parking. Policy T7 of the London Plan seeks to ensure that development proposals facilitate safe, clean and efficient deliveries and servicing and provide adequate space for deliveries and servicing off-street. Policy T9 of the London Plan sets out that planning obligations, including financial contributions, will be sought to mitigate impacts from development.

6.66 Policies SP8, DM29 and DM30 of the Croydon Local Plan require redeveloped sites to increase permeability, connectivity and legibility and require development to contribute towards the provision of electric vehicle charging infrastructure, car clubs and car sharing schemes, promote measures to increase the use of public transport, cycling and walking, have a positive impact and must not have a detrimental impact on highway safety and do not result in a severe impact on the transport network local to the site, as well as providing a sufficient level of car and cycle parking.

Site Access

6.67 Two access points into the site are proposed broadly in the location of existing access points into the current Woburn and Bedford Court complex. The first of these is located on Tavistock Road and will lead onto a one way vehicular route (westbound) running along the south side of Block 4, before turning north and exiting onto Newgate and will provide vehicular access to Blocks 1 and 4. The second access point will be located directly off of Wellesley Road between Blocks 2 and 3 and will allow both access and egress for vehicles to Blocks 2 and 3. In principle officers are supportive of the number and location of vehicular access points provided across the site and as part of any future planning application

officers will expect the applicant to provide full tracking details and demonstrate that said access points achieve the necessary vehicular and pedestrian visibility splays.

Trip Generation / Transport Impacts

- 6.68 Given the site's sustainable location within both the Croydon Opportunity Area and an area benefitting from a PTAL of 6b it is envisaged that the overwhelming majority of trips associated with the development will utilise sustainable modes of travel such as walking, cycling or public transport in line with the Mayor's Healthy Streets approach. Furthermore, it is also recognised that the proposed development seeks to provide a number of public realm improvements (such as along Wellesley Road and through the creation of a new east-west pedestrian link) which will further encourage the use of sustainable modes of travel both within this development and the local area. Whilst initial discussions with the Council's Strategic Transport team have taken place to outline the scope of any future assessment, including trip generation estimates for the proposed development, any future application will need to be accompanied by a detailed Healthy Streets Transport Assessment which fully assesses the implications of the proposals.

Servicing and Delivery

- 6.69 As has been noted in the 'Site Access' section, the site will benefit from two points of access off of both Wellesley Road and Tavistock Road. All of the servicing and delivery movements associated with the proposed development are envisaged to take place off street, with the new east-west road allowing for the servicing of both Blocks 1 and 4, with vehicles either stopping at the necessary points along this route (in respect of Block 4) or using the dedicated servicing bays to the east of Block 1. For Blocks 2 and 3, the access point between these blocks will be utilised and leads to a turning head where vehicles can turn such that they can enter and exit the site in a forward gear. Should the adjacent St Mary's School site come forward in the future for redevelopment this access road could be extended further eastwards through the adjacent site linking through to Tavistock Road. The current proposals have been reviewed by the Council's Strategic Transport team and officers are satisfied that the proposed servicing and delivery strategy for the site is acceptable. As part of any future planning application a draft servicing and delivery plan will be expected to be submitted with the final version being secured through condition.

Car Parking

- 6.70 Given the site's highly accessible location the scheme would be expected to be car free, with the exception of Blue Badge parking within the site in line with London Plan and Croydon Local Plan policies. Policy T6.1 of the London Plan requires developments to provide Blue Badge bays for 3% of dwellings from the outset and demonstrate how an additional 7% of dwellings could also be provided with a Blue Badge space in the future should there be need. The current proposals seek to provide a total of 14 Blue Badge parking bays (which accords with the 3% requirement) which would be located both between Blocks 1 and 4

and within an internal parking area within Block 2. It has also been suggested that the remaining 7% provision (should it be required in the future) could potentially be delivered on-street in the local area, however further work to demonstrate this is still required.

- 6.71 As the site sits within a Controlled Parking Zone (CPZ) all of the proposed homes would be secured as permit free and it is expected that the developer will enter into a legal agreement to ensure future residents will be prohibited from applying for on-street parking thereby mitigating any potential impact upon parking stress levels within the local area.
- 6.72 A car club bay is currently proposed to be located adjacent to the access to Tavistock Road, and whilst its provision in principle is supported further details of the exact design of this space are required before officers are content that its location and design are acceptable. At present the applicant has not provided further details regarding the operation of the car club bay however given a number of major car club companies operate in this area officers are satisfied that it will be a viable proposition. Said provision, including three years membership for all future occupiers of the development would be secured as part of any future legal agreement.

Cycle Parking

- 6.73 The proposed development is seeking to include long stay and short stay cycle parking in accordance with the London Plan and London Cycling Design Standards (LCDS) requirements, for both the residential and non-residential uses proposed with a total of 820 cycle parking spaces proposed. The proposed cycle parking stores are located across basement, ground and mezzanine levels and where not at ground floor will be served by suitably sized lifts to allow for ease of access. The proposed cycle stores will also include a mixture of double stacked spaces and Sheffield stands alongside spaces for larger adapted bikes, and provision for the charging of electric bikes will also be provided.

Refuse and Recycling

- 6.74 Refuse and recycling provision for the proposed development is proposed to be housed across both the basement and at ground level and has been located such that it is within close proximity to the servicing and delivery bays across the development. A high-level refuse and recycling strategy demonstrating that said stores would have sufficient capacity and that these stores would be within suitable drag distances of where the refuse vehicles would stand has been provided and subject to further details appears to demonstrate that a policy compliant provision can be provided.

Mitigation

- 6.75 In order to offset any impacts of the proposed development on the local transport network contributions (of at least £1,500 per home) towards improvements to sustainable transport will be required. As discussed in the 'Landscaping and Public Realm' section of this report the Council is currently progressing plans for

improvements to this stretch of Wellesley Road and given the interrelationship between the proposed development and these works it is likely that a contribution towards these works will be expected from the proposed development. Further to the above and as previously mentioned future occupiers of the proposed development will be restricted from obtaining parking permits and will be provided with car club membership for the first 3 years of the development. Any works to the public highway to facilitate the new/revised access points to the site will necessitate the applicant entering into a S.278 agreement with the Council.

- 6.76 In addition to the above and given the scale of the proposed development Transport for London are likely to have further requirements and financial obligation requests.

Environmental Matters

Sustainability

- 6.77 Policies SI 2, SI 3 and SI 4 of the London Plan require development to be net zero-carbon in accordance with the London Plan energy hierarchy with at least a 35% on-site reduction in carbon dioxide emissions beyond Building Regulation requirements with any remaining shortfall to be provided through a cash in lieu payment alongside a calculation of whole life-cycle carbon emissions. Where they are located within Heat Network Priority Areas developments should have a communal low-temperature heating system, and they should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy. Policy SI 5 of the London Plan requires development through the use of planning conditions to minimise the use of mains water, achieving mains water consumption of 105 litres or less per head per day, and policy SI 7 of the London Plan requires development to promote circular economy outcomes and aim to be net zero-waste. Policy SP6 of the Croydon Local Plan requires development to make the fullest contribution to minimising carbon dioxide emissions, promotes the development of district energy networks and requires new build non-residential development of 500sqm and above to achieve a minimum of BREEAM Excellent.
- 6.78 The applicant is fully aware of the above requirements and has indicated that the proposed development would be net zero-carbon, including achieving a minimum 35% on-site reduction in carbon dioxide emissions beyond Building Regulations requirements, which is welcomed. A range of sustainability measures are being incorporated into the development including passive design measures, energy efficient energy and heating generation (which would focus on an all-electric strategy, including the provision of a communal heating system) as well as the provision of Air Source Heat Pumps (ASHP) and Photovoltaic Panels (PVs). As part of any future planning application a suite a necessary documents covering and demonstrating compliance with the above policies will be required.

Flood Risk and Sustainable Drainage

- 6.79 Policies SI 12 and SI 13 of the London Plan state that development should ensure that flood risk is minimised and mitigated, with any residual risk being addressed, and should also aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible through following the London Plan drainage hierarchy. Policies SP6 and DM25 of the Croydon Local Plan require development to apply the Sequential and Exception Tests, be accompanied by a site specific Flood Risk Assessment, to utilise sustainable drainage systems to reduce surface water run-off and provide water treatment on site, and where relevant account for possible groundwater contamination in Source Protection Zones 1 and 2.
- 6.80 The site is located in Flood Zone 1 meaning that it is at a very low risk of flooding from rivers and the sea, and whilst parts of the site are at risk of surface water flooding overall the risk across the site as a whole are relatively low. Due to the site's location within Flood Zone 1 the Sequential and Exception Tests are not required for this site and any risk of the site flooding from rivers or sea is exceptionally low and no specific mitigation in this regard is required. In respect of surface water flooding, it is expected that the proposed development will incorporate suitable Sustainable Drainage Systems (SUDs) and as part of any future application a detailed Flood Risk Assessment and Sustainable Drainage Strategy will be expected to be submitted and will be reviewed by the Lead Local Flood Authority (LLFA).

Air Quality

- 6.81 Policy SI 1 of the London Plan states that development should not lead to further deterioration of existing poor air quality, must be at least 'Air Quality Neutral', should demonstrate that design measures and solutions have been incorporated to minimise exposure to existing air pollution, and should also demonstrate how they reduce emissions from the demolition and construction process following best practice guidance. Policies SP6 and DM23 of the Croydon Local Plan require development to positively contribute to improving air quality by minimising pollution, are 'Air Quality Neutral' and do not lead to further deterioration of existing poor air quality.
- 6.82 The entire borough of Croydon is an Air Quality Management Area (AQMA), and it is therefore important that careful consideration is given to the air quality impacts of the proposed development. The applicant has indicated that the proposed development will be air quality positive and as part of any future planning application an air quality assessment detailing how the scheme will comply with the aforementioned policies will be required. Of particular importance will be a demonstration of how the residential units and amenity areas which front Wellesley Road and Newgate at the lower levels of the buildings are suitable from an air quality perspective.

Wind and Microclimate

- 6.83 Policy D9 of the London Plan requires development to ensure that wind conditions around the building(s) and neighbouring area are carefully considered and do not compromise comfort and the enjoyment of open spaces around the

building(s), and policy SP4 of the Croydon Local Plan requires development to minimise its environmental impacts. The applicant has begun to explore wind impacts and consider how the scheme can respond to these impacts to reduce any adverse impacts as far as possible, with there being an expectation from officers that any remaining impacts are dealt with through mitigation measures embedded into the design of the scheme, as opposed to through soft landscaping interventions which have less permanency. Once the applicant is more confident that the current proposals have the support of the Council it is envisaged that further wind testing will be undertaken, and it is imperative that such work is undertaken at the earliest opportunity such that any necessary amendments to the scheme to deal with any issues identified can be incorporated.

Trees and Ecology

- 6.84 Policy G7 of the London Plan sets out that development proposals should ensure that, wherever possible, existing trees of value are retained, and that where it is necessary to remove trees adequate replacements should be provided. Policies DM10 and DM28 of the Croydon Local Plan seek to retain existing trees and do not permit developments that result in the avoidable loss of preserved or retained trees where they make a contribution to the character of the area. Policy G6 of the London Plan states that development should manage impacts on biodiversity and aim to secure net biodiversity gain, whilst policies SP7 and DM27 of the Croydon Local Plan seek development to incorporate biodiversity measures such as green roofs and green walls which enhance local flora and fauna and aid pollination locally. Finally, policy G5 of the London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design.
- 6.85 The existing site (including the strip of land to the front facing Wellesley Road within the Council's ownership) currently features a total of 21 trees and hedges, of which 3 are category B trees, 17 are category C trees or hedges and 1 is a category U tree. In order to facilitate the proposed development a total of 12 trees and hedges are proposed to be removed, of which 1 would be a category B tree, 10 are category C trees and hedges and 1 is a category U tree.

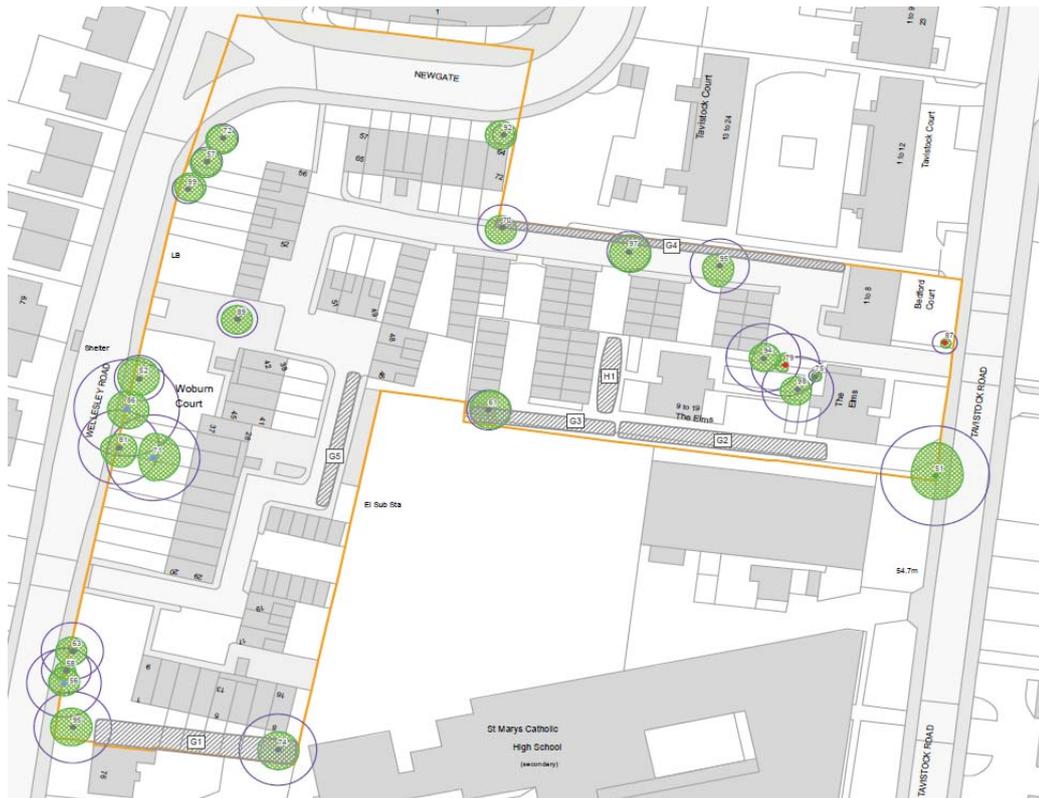


Figure 33: Existing site tree survey (also including the adjacent The Elms site)

6.86 In respect of the removal of the Category C and U trees and hedges officers are generally content that their removal is acceptable (subject to suitable replacement planting). In respect of the proposed removal of a Category B tree (a Lime tree to the front of the site facing Wellesley Road) alternative options which attempted to retain this tree (through creating a setback element in the podium) have been explored however were deemed to be too much of a compromise to the overall design and internal quality of the development, and therefore regrettably it has been concluded that the removal of this tree would be necessary to facilitate the development. In order to mitigate for both its loss and the loss of the other trees across the site the applicant is proposing to plant a total of 71 new trees across the site, including a number of large broad canopy street trees, many of which would be planted along the Wellesley Road frontage of the development to complement the retained trees. Given the extent and nature of new tree planting (see Figure 34) officers are therefore content that the current scheme is likely to be acceptable from an arboricultural perspective subject to further details regarding the planting conditions for the new trees being provided.



Figure 34: Proposed tree planting plan

6.87 In addition to the extensive new tree planting extensive planting is also proposed across the site including a mixture of species that have been chosen for sunny and shady conditions relevant to their proposed location. In order to demonstrate compliance with policy G5 of the London Plan the applicant has undertaken an initial calculation of the Urban Greening Factor for the proposed development which currently shows that the proposals are set to achieve a score of 0.35 which is below the policy target score of 0.4. Officers are of the view that the scheme is capable of achieving a score of 0.4 or above and it is expected that amendments are made to allow this target to be met and the applicant has suggested that with amendments they believe the current figure can be improved upon.

6.88 The applicant has committed to providing a wide range of native planting species across the scheme which would contribute positively to biodiversity and has also proposed biodiverse habitat roofs across the scheme. Based on the current scheme and the existing site conditions officers are content that the proposals will be capable of achieving biodiversity net gain. Such details will need to be worked through as the scheme progresses and must be fully integrated into the scheme, with full details being required at application stage.

Other Matters

6.89 There are a number of other planning matters which include 'Secure by Design', archaeological impacts, public art, land contamination and health impacts where

details have not yet been provided to officers, however it is understood that the applicant is working through these matters, with details to be forthcoming either later on during the pre-application process or as part of any future application.

6.90 Any future application will be accompanied by an Environmental Impact Assessment (EIA) and a previous iteration of the scheme was subject to an EIA Scoping Opinion (19/03746/ENVS) where the scope of the EIA was approved. Prior to the submission of any future application an updated EIA Scoping Opinion covering the revised scheme will be submitted to the Council.

Mitigation

6.91 At this stage it is envisaged that a range of planning obligations will be required to mitigate the impacts of the proposed development. Whilst detailed discussions with the applicant team on these matters are yet to take place, it is anticipated that these would likely include the following (this is not an exhaustive list):

- Affordable Housing (on-site)
- Affordable housing review mechanisms (early and late stage)
- Employment and training contributions and obligations (construction/operational)
- Air Quality contribution
- Carbon offsetting contribution (if required)
- Sustainable transport contributions (to potentially include enhancements to the stretch of Wellesley Road adjacent to the site)
- Car parking permit restrictions
- Car club provision and membership (3 years free)
- Travel Plan
- Transport for London contributions
- Public realm delivery and maintenance including allowing the public to pass and repass within the public realm areas, inclusive of the new east-west pedestrian link
- Measures to include the provision of future linkages to neighbouring sites should they come forward in the future
- Public art provision
- S.278 (highways) works
- Wind mitigation
- Television signal mitigation scheme
- Retention of scheme architects
- Relevant monitoring fees

7 SPECIFIC FEEDBACK REQUESTED

7.1 In view of the above, it is suggested Members focus on the following issues:

1. The principle of tall buildings in this location, and the amount and distribution of scale/bulk/height across the site (including any views on the proposed alternative massing options), as well as the impacts upon

surrounding heritage assets (weighing these against the public benefits proposed).

2. The design approach and elevational treatment, including materiality, with a particular focus on both the towers and the Wellesley Road fronting podium.
3. The approach to public realm, private and communal amenity space and child play space across the development, including any views on the elements of the proposal outside of the applicant's ownership (namely The Elms and the Wellesley Road frontage).
4. The 37% affordable housing provision and whether the proposed tenure split currently proposed is appropriate.
5. The approach to residential quality within the development, and the potential impacts on neighbouring properties in terms of light, outlook and privacy.