

1. DETAILS OF THE DEVELOPMENT

Ref: 21/01997/PRE
Location: Citiscape, Drummond Road and Frith Road, Croydon, CR0 1TW
Ward: Fairfield
Description: Demolition of existing buildings; redevelopment of the site to deliver approximately 130 new homes across two residential buildings, landscaping, car parking and associated works.
Applicant: Barratt London
Agent: Quod
Case Officer: Neil McClellan

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:
- a. Executive summary
 - b. Site briefing
 - c. Place Review Panel feedback
 - d. Matters for consideration and officers' preliminary conclusions
 - e. Specific feedback requests
 - f. Procedural matters

3. EXECUTIVE SUMMARY

- 3.1 The scheme has so far been developed through a number of pre-application meetings with officers. It was considered by the Place Review Panel (PRP) on 16th September 2021 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 the adjacent conservation area, impact on the skyline from longer range views, impacts on neighbouring buildings (in terms of light/outlook/privacy etc.),

transportation matters, and early discussion have begun on the provision of affordable housing.

- 3.3 Due to its height the proposed development is referable to the Greater London Authority (GLA). The applicants have scheduled pre-application discussions with officers of the GLA but they had not commenced at the time of writing this report.
- 3.4 It is anticipated that a single full planning application will be submitted to cover the whole site.

4. SITE BRIEFING

- The site has an area of approximately 0.2 ha and is currently occupied by Citiscape, a residential building varying in height from 4 to 12 storeys and comprising 95 flats with a large basement containing 72 car parking spaces.
- The existing building was built by Barratt between 2000 and 2003. All the apartments within the scheme were sold to individual occupiers between 2001 and 2003, whilst the site freehold was sold to an investor in 2003.
- Although having no legal interest in the site or legal duty in relation to the building, fire safety checks were carried out by Barratt in 2017. It was discovered that the existing cladding was potentially unsafe and Barratt voluntarily agreed to pay for its replacement.
- Works to remove the cladding identified structural concerns and, after review and further works, residents were moved out of the building in 2019, with Barratt funding temporary accommodation. The works required to make the concrete frame of the building safe were eventually found to be significant, and of a time-consuming and intrusive nature.
- In 2020 it was decided that the best outcome for residents would be for Barratt to offer to purchase their homes at full market value. Barratt would then remediate or redevelop the site.
- The site has been vacant since early 2019 and is currently covered in scaffolding and screening.

Image 1: aerial photograph



Images 2 and 3: birds eye views of the existing building



Designations

- The site is located within the Croydon Opportunity Area (so policy DM38 applies) and within the 'Edge Area' for tall buildings (See *Images 4 and 5: Extracts from Croydon Local Plan 2018*).
- The site is adjacent to the Church Street Conservation Area, the boundary of which runs along the opposite side of Frith Road to the site (See *Image 6: Conservation Area Map*).
- The site sits within the Old Town Masterplan (2014) area, specifically components OT3 (Frith Road and Keeley Road) and OT12 (Drummond Road).

Images 4 and 5: Extracts from Croydon Local Plan 2018

■ Croydon Opportunity Area

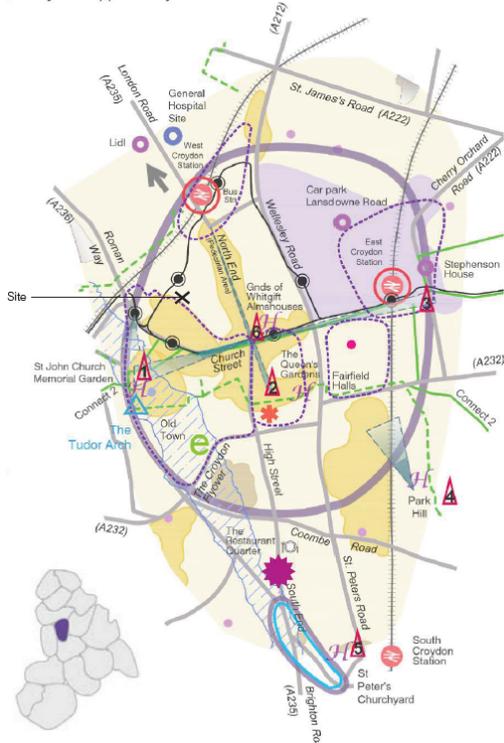


Figure 11.6: Plan of the Central and Edge areas for tall buildings (Policies DM38.3 and DM38.4)

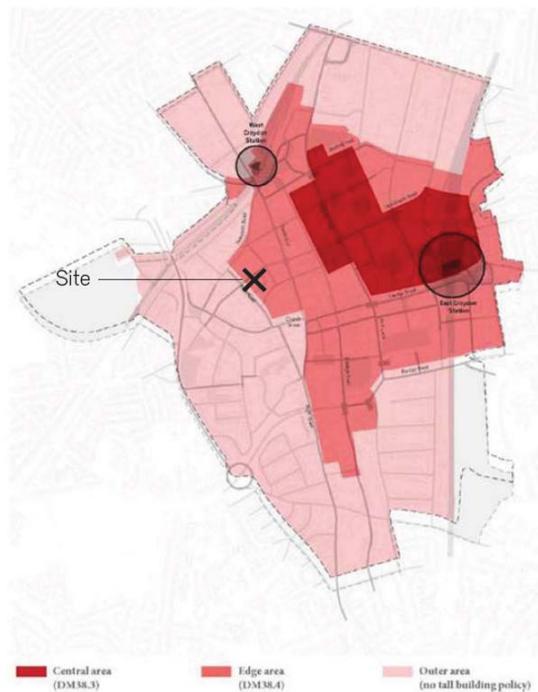


Image 6: Conservation Area Map



- The site has a Public Transport Accessibility Level (PTAL) of 6b, the highest level possible. There are a number of Tram stops within easy walking distance of the site. West Croydon Station is less than 400 metres from the site and East Croydon Station is also a relatively short walk away.
- All the roads around the site are within the Central Croydon Controlled Parking Zone.
- Archaeological Priority Area
- Surface water flood risk (Low/Medium)

Image 7: Surface water Flood Map (Gov.uk)



● High ● Medium ● Low ○ Very low

Surrounding Area

- The surrounding area contains a wide variety of building types and scale, with the rear part of the Centrale shopping centre and its car park surrounding the site to the north, east and south, with two storey terraced housing on the opposite side of Frith Road.
- Keeley House is a relatively modern three-storey development which backs on to the site and contains a children's nursery on the ground floor with flats above.
- There are some commercial uses located on the opposite side of Drummond Road and Keeley Road to the site.

Relevant Planning History

- 4.1 01/02845/RE - Amendment to approved scheme (99/03007/P) reducing the number of parking spaces to 73, reducing the number of 2-bedroom flats by one and increasing the number of 1-bedroom flats by one. Granted 20.02.2002.
- 4.2 99/03007/P - Demolition of existing buildings; erection of building comprising 3 to 10 floors to accommodate 74 two bedroom, 17 one bedroom and 4 three bedroom flats; formation of vehicular accesses and provision of 76 parking spaces (Approval of reserved matters attached to planning permission 97/002630/P). Permission Granted 20.07.2000.
- 4.3 97/00263/P - Outline planning permission for the demolition of existing buildings and the erection of building comprising 3 to 10 floors to accommodate 74 two bedroom, 17 one bedroom and 4 three bedroom flats. Outline Permission Granted 09.04.1997.
- 4.4 10/03769/P - Alterations to elevations to include over cladding and increase in height of parapet; replacement of doors/windows to the south-west/south-east elevations. Permission Granted 10.01.2011.
- 4.5 18/05648/LE - Existing use of premises as Sui Generis car show room. Lawful Development Certificate granted on 16.01.2019.

Proposal

- 4.6 The proposal has been amended during the course of on-going discussions. The current proposal is for the following:
 - Demolition of the existing building.
 - Erection of a 5-storey building along the site's Frith Road frontage.
 - Erection of an 18-storey building along the sites Drummond Road frontage.
 - Provision of 129 flats.
 - 8-9 basement car parking spaces (all blue badge spaces) accessed from the existing ramps location.
 - Communal outdoor amenity space within the courtyards and on rooftops.
 - Indoor communal space.
 - Cycle and refuse storage.

4.7 The current unit mix comprises:

Occupancy	Units	% Mix
1 bedroom	46	37%
2 bedroom	74	56%
3 bedroom	9	7%
Total units	129	100%

Image 8: current visual, Frith Road to right, Drummond Road to left



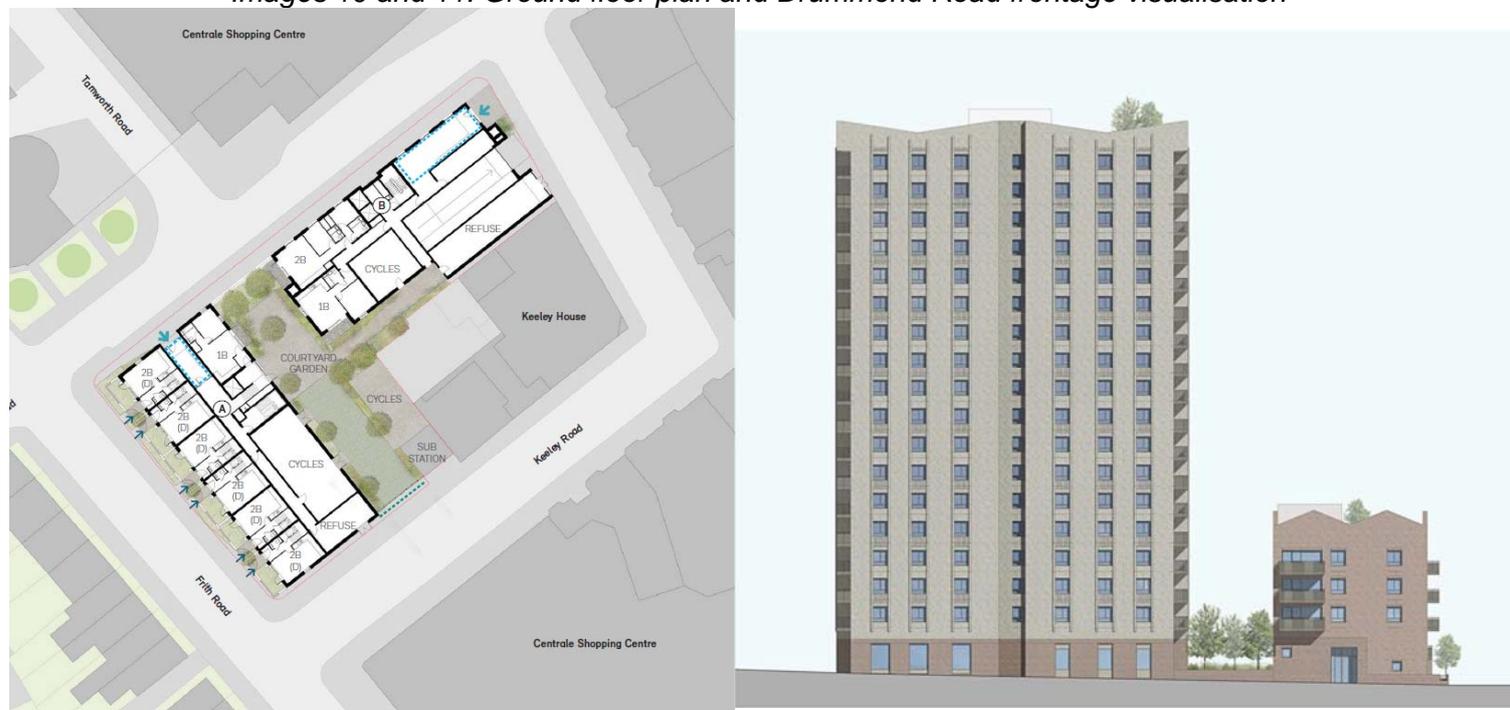
Image 9: current visual, Drummond Road



5. PLACE REVIEW PANEL FEEDBACK

- 5.1 An earlier iteration of the current designs were presented to the Council's Place Review Panel on 16 September 2021, see images and plans below.

Images 10 and 11: Ground floor plan and Drummond Road frontage visualisation



Heritage

- 5.2 The Panel were broadly comfortable with the approach to Frith Road and its interface with the Church Street Conservation Area. The Panel recommended developing the street level visualizations in more detail noting it is not just long range views which are important, but also the pedestrian experience of an area. The detailing and quality of the scheme will be critical to enhance the setting of the Conservation Area. The Panel expressed some concern over the taller element in certain views. The most sensitive view is from the Grade I Listed Minster. The prominence of the tower as an ecclesiastical way marker must be retained. Whilst the proposed development appears in the background of views of the Church, the Panel noted there is an existing consent which is taller and in closer proximity. The Panel need to see more detailed information to confirm that the taller element is acceptable. This could include additional views of the scheme showing texture and grain.

Massing

- 5.3 The Panel concluded that the approach to massing appears sensible and acceptable in general. The principle of a lower element addressing the Conservation Area, and a taller element which transitions into the town centre was accepted. The Panel suggested further consideration be given to the "Base" "Middle" and "Top" of the taller building and how this could improve its articulation and proportion. The Panel commented that the "Base" of the taller building appeared tentative and was not even a fully storey in parts and the proportions

need further work. The Panel agreed the principle of dividing the wider elevation of the tall building with a vertical 'gap', but they suggested this was not yet bold enough. The current shadow gap does not provide sufficient relief or depth, which may result in the facade appearing flat and dull. In terms of the roofscape, the Panel commented that this seemed to work successfully on the lower block, but further consideration is needed on the treatment of the "Top" of the taller block.

Site Layout

- 5.4 The Panel acknowledged that this is a difficult site with challenging adjacencies to both the Conservation Area and the large edifice of the shopping centre and car park. The Panel stressed that the open space is critical to the identity of the development and could be a big selling point for future occupiers if better laid out and with more specific spaces. They felt the location of the communal entrances to the blocks should be from the central courtyard which would activate the courtyard and encourage interaction between residents of different blocks. The Panel were concerned the current route to the amenity space would be circuitous and fear the courtyard would not be well used. The Panel accept the justification and rationale for the entrance on the Northern corner. However, they encouraged the applicant to see if there were other ways of creating visual connection through from the lobbies to the courtyard. The Panel strongly recommended introducing internal amenity space in place of the bike stores. This would bring a better outlook and use of the courtyard and be a benefit to the residents with children that only have small balconies. Cycle parking could then be relocated to the basement.

Landscape and Public Realm

- 5.5 The Panel commented that it was difficult to know what the intent for the landscaping of the internal courtyard was, which they could only judge on the architecture around it. This suggested the space would have blank frontages, indirect routes and may be overshadowed for large parts of the day. The applicant was encouraged to further develop this aspect. The Panel noted that lots of children will live in the development and there needs to be a robust play space strategy. The Panel agreed that gating the green space is the correct approach, given the condition of surrounding roads and that safety and good lighting needs to be designed in. The Panel suggested that the design team look closer at the ground floor experience as a pedestrian and how this can be improved. The applicant should also consider place making interventions at key junctions such as at Drummond/Frith Road. There are also opportunities to have more active frontages along Drummond Road as this is a key route up to the High Street. Generally, the applicant should look at the quantum of green infrastructure provided and should aim to maximise biodiversity net gain and environmental net gain.

Design

- 5.6 The Panel believe a dual aspect, gallery style arrangement for the southern block could work better than single aspect on to public streets. In further developing a "Base" "Middle" and "Top" strategy for the taller building, the applicant should consider how outlook changes as you move up the building. The lower level flats on Drummond Road would face directly onto the back of the shopping centre and car park, whereas upper level flats would likely have open views of the town

centre. The Panel believe the elevation treatments should change in response to the differing conditions and orientation. At present they are bland and non-descript. Detailed floor plans were not provided but the Panel stressed that all units and floor areas need to comply with the Mayoral Standards. Whilst it is positive that 13 disabled flats are provided, none of these are at ground floor level which should be reviewed.

Affordable Housing

- 5.7 The Panel are encouraged by comments about the distribution of affordable units throughout the scheme. However, they remain unconvinced at the overall strategy which only provides affordable housing for the uplift on existing units. They encouraged Council Officers to carefully consider this and emphasized that all new build schemes should comply with the standards on social housing mix.

Architectural Expression

- 5.8 The Panel were more convinced by the architectural expression and materiality of the lower block than the taller block which needs better articulation. The response to the Victorian terraces seems well considered but more can be done to develop a more up to date version of the architectural expression of tall buildings. The Panel questioned whether this same language should be applied to the taller element. The two blocks would be viewed and experienced in different positions; the base of the tower and the lower block are experienced at street level, whereas the upper levels of the tower are predominantly experienced from further afield, in long range views. The Panel suggested that the two blocks should complement each other, rather than trying to find commonality. The difference in expression between the two blocks could be celebrated more, perhaps with a unifying base. The Panel commented that the tall building elevation is austere and need to be imbued with more joy in terms of its fenestration proportion, materiality and detailing. The Panel also stressed that the corners of the development will be very important, and the end flanks of houses could be better animated through openings, detailing etc. The corner for example could have an active and more generous entrance space, where people could meet or sit, with a link or outlook onto the rear green active courtyard.
- 5.9 In general the Panel agreed that the proposal is a huge improvement on the existing building and did not raise any fundamental concerns with the proposal. They are broadly supportive of the proposal and think it is heading in the right direction in terms of its height/mass/density. There is clearly a lot of potential for the elevation treatment and the Panel encourage the applicant to think more about the users of the building and the sense of community, as this is what will make the development thrive.

6. SUMMARY OF MATTERS FOR CONSIDERATION

- 6.2 The main matters for consideration in a future submission are as follows:
- Principle of Development
 - Design, Townscape and Heritage
 - Impact on Adjoining Occupiers Living Conditions
 - Mix and Quality of Accommodation Provided

- Highways
- Environment
- Other matters
- Mitigation

Principle of Development

Residential Development

- 6.3 The principle of residential use had already been established with the existing development. London Plan 2021 policy H1 has a 10 year housing target for Croydon of 20,790 units. The Council's housing policies seek to maximise the re-use of previously developed land and buildings. However, they also require a balance to be struck between developing land for more efficient housing use and protecting character/heritage/neighbouring amenity etc. Therefore the principle of intensifying residential use in this location is acceptable, subject to satisfying the criteria of other relevant policies.

Design, Townscape and Heritage

General

- 6.4 Croydon Local Plan 2018 states that a tall building is a building that is 6-storeys high (25 metres) or which is significantly taller than its surrounding buildings.
- 6.5 The development plan contains a plan-led approach to guiding the location of new tall buildings, which in the case of Croydon would be within the Opportunity Area Planning Framework (OAPF). The site lies within the defined Edge area of the OAPF. Policy DM38.4 of the Local Plan states that within the Edge Area of Croydon Opportunity Area tall buildings may be acceptable where it can be demonstrated that there will be limited negative impact on sensitive locations and that the form, height, design and treatment of a building are high quality.

Massing

- 6.6 The principle of the lower 5-storey element addressing the Conservation Area, and the taller 18-storey element adjacent to the Centrale Centre is considered acceptable, subject to the requirements of Policy DM38.4.
- 6.7 Whilst the building would be visible from a number of viewpoints officers are comforted that its massing is appearing acceptable in townscape terms. This has been reviewed within VuCity from a number of vantage points.

Active frontage

- 6.8 The reduction in the size of the existing basement allows for the removal of the plinth that current stretches along the Frith Road frontage. This allows for the ground floor of the proposed lower block to address the street directly making for a much improved townscape along Frith Road. This aligns with intentions of the Old Town Masterplan in this location.

Images 11 and 12: Existing and proposed relationship to Frith Road



6.9 Similarly the reduction in the size of the basement removes the existing basement plinth and ventilation ducts from along the Drummond Road frontage replacing a blank and unattractive wall at street level with an active frontage and allowing the pavement on this side of Drummond Road to be widened. This also aligns with intentions of the Old Town Masterplan in this location.

Images 13 and 14: Existing and proposed relationship to Drummond Road



Layout

6.10 The layout of the building allows for ground and first floor duplex units to have front doors directly on to Frith Road creating a far more positive and legible relationship with the street than the existing building. Placing the main communal entrance for the taller block on the corner of Drummond Road and Keeley Road activates this corner which on the existing building is blank and uninviting. In response to suggestions from PRP a more generous entrance lobby has been introduced and communal internal amenity/meeting space has been introduced at ground floor. This allows for a much greater level of activation along Drummond Road.

Images 14 and 15: Existing and proposed Drummond Road/Keeley Road corner



6.11 Following the PRP's advice the applicants have replaced the main cycle storage with a repositioned communal entrance and lobby to the lower block, which better activates the elevation facing Keeley Road and creates a more positive and active relationship between this block and the internal courtyard.

Images 16 and 17: GF Plan and visualisation of revised Keeley Road entrance



6.12 Typical floor plans have been provided for the upper floors of the two blocks. In both blocks the number of flats accessed per floor from each core is six. This welcomed and is conformably below the maximum of eight units per floor generally considered acceptable.

Image 18 typical upper floor plan



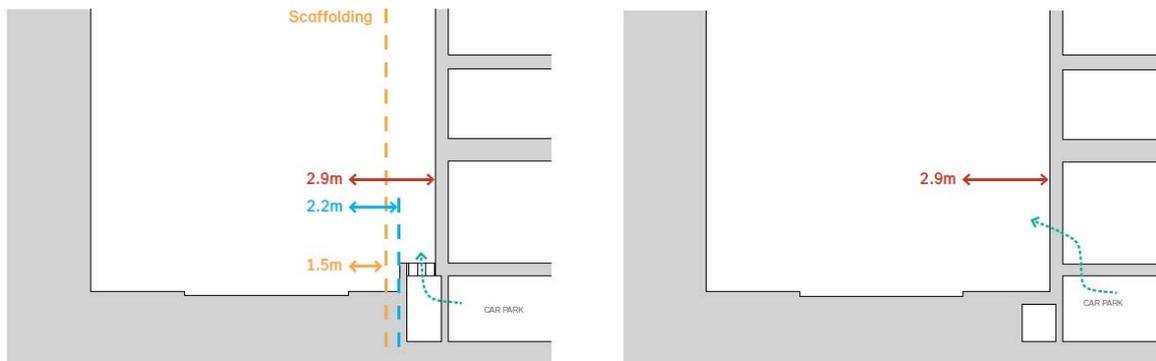
Landscaping and Public Realm

6.13 The massing and layout of the proposal allows for greater activation of the development's various ground floor frontages creating a much better relationship with the street and improving the public realm around the site. This is welcomed, particularly so along Drummond Road which currently suffers from blank and inactive frontages along both sides of the street and which is one of the main pedestrian routes into the Town Centre. The removal of the existing basement plinth and ventilation ducts (discussed above) also allows for the pavement along this side of Drummond Road to be widened creating a more generous and, with the other improvements discussed above, attractive public realm. This is fully supported by the Old Town Masterplan which seeks enhancement to public realm, active frontages and greening to Drummond Road.

Image 19: Pavement widening along Drummond Road, existing (l), proposed (r)

Existing

Proposed



6.14 Communal amenity space will be provided in the ground floor courtyard and in roof top gardens on both blocks. Initial indicative studies of how these spaces might be laid out are encouraging and shown below.

Images 20 and 21: Indicative plan (l) and visualisation of the courtyard (r).



Image 22: Sketch proposal for the roof gardens.



6.15 The scheme has been designed to allow for the planting of street trees which officers will be expecting the applicant to contribute to delivery.

Image 23: Frith Road frontage showing street trees



Architectural Expression

6.16 Both blocks are almost entirely brick structures. The architectural expression and materiality of the lower block is considered to work well. The PRP's suggestion that greater articulation and animation of the lower block's flank elevations through openings and detailing was required has been addressed. This has been achieved with the flank facing Keeley Road now containing the communal entrance to the lower block on this elevation. Officers still consider the flank elevation facing Drummond Road is less successful; whilst the upper floors have been better articulated through additional openings and balconies, the ground floor still requires greater articulation, shown below. It is important, however that this is considered in the context of improvements compared to existing and the

applicant retaining more of the basement to facilitate the cycle parking (responding to PRPs concerns), which causes this challenging aspect.

Image 24: Flank elevation of the lower block facing Drummond Road



6.17 Following the PRP's comments the taller block has been amended. More articulation and animation along the ground floor elevation also helps to create the sense of the building having a base. The shadow gap running vertically up the building has been made more substantial, further articulating this elevation and helping to break up its mass. However Officers are still not convinced that the base is substantial enough or that it addresses the PRP's view that the taller building should have a sense of a top, middle and bottom. Variations in detailing and materiality between the base mid-section and top of the building should be further explored. Notwithstanding these concerns the proposed taller building as currently presented has many positives compared to the existing building, a wider and more generous public realm along Drummond Road and active and animated ground floor frontages which are welcomed.

Image 25: Base of the taller building.



- 6.18 A public art strategy will need to be formed as part of any submission and the earlier that this is considered the more successful it will be.

Heritage

- 6.19 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possess. With regard to conservation areas (at section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance. Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets.
- 6.20 The existing building is generally considered by officers to be of poor quality. Its design, architectural form and materiality do not relate well with the conservation area opposite. The scheme has the potential to improve its relationship with Frith Road and the setting of the adjacent conservation area. The applicant's design team have carried out some initial visual impact assessment work on the impact on other heritage assets in Croydon Town Centre including the Grade 1 listed Minster and no concerns have been raised at this stage. The proposal would be seen from Surrey Street looking out of the Central Croydon CA but there is nothing to suggest at this stage that there would be any harm derived from this.

Impact on Adjoining Occupiers Living Conditions

- 6.21 Separation distances to residential properties on the opposite side of Frith Road are sufficient to avoid unacceptable levels of overlooking/loss of privacy and in any case are not materially different from the current situation. There are a number of windows to kitchens and bedrooms in the flats above Keeley House that face towards the proposed 18 storey block. These windows will be approximately 13.5 metres from directly facing windows and balconies in the proposed taller block. The existing 12 storey building and its balconies are approximately 14.5 metres from the same windows. Whilst the Council's Suburban Design Guide is not strictly relevant as this is an urban town centre location, it suggests that the minimum separation distance between directly facing habitable room windows in new and existing development should be 18 metres. However, this needs to be applied flexibly, particularly in a dense urban OAPF location with an existing relationship already less than the 18m. While the proposed building is 6 storeys taller than the one it will be replacing, it will not be introducing any new or more intrusive forms of overlooking than currently exists. Officers conclude that any impacts on privacy will be no more materially harmful than the current situation and is therefore likely to be acceptable, subject to consideration of any representation come application stage.
- 6.22 In terms of daylight/sunlight, information submitted to officers suggests that there will be some impact upon the surrounding context, in terms of daylight, but where transgressions occur they are in-line with those typically achieved in urban areas.

- 6.23 In terms of the proposals impact on houses in Frith Road (Nos. 22-36) changes to those property's visible sky component (VSC) are considered generally minor (between 20-30% reduction) with all windows with the exception of four retaining in excess of 15% VSC. These four remaining windows are smaller side windows in the houses front bays and partially obstructed by the protruding bay windows of their neighbours and given that the bay windows benefit from two additional window panes, the bay windows overall will retain in excess of 15% VSC.
- 6.24 In terms of the no-sky line (NSL) assessment (see appendix 1), 22 and 36 Frith Road remain compliant. The remaining properties will experience a mixture of minor, moderate and major change. The applicant states that the major changes are isolated to bedrooms, rather than living rooms, where the expectation for natural daylight is considered to be lower. This must be confirmed prior to submission of a planning application.
- 6.25 With respect to sunlight only 24 and 26 Frith Road experience a minor change to one window each. These windows are oriented at 84 and 82 degrees from due south and as a result they will only have an oblique access to sunlight and it would be difficult for these windows to meet the target values.
- 6.26 In respect of Keeley House a number of the windows affected already receive low levels of daylight with a VSC between 2-11%. Given the low level of existing daylight these windows receive, even the predicted modest reduction in absolute terms of 1-4% (with one exception at 8.1%) represents a disproportionately high percentage reduction of up to 58% in some cases on current daylight levels. Whilst in absolute terms this is still at a level considered too small to be noticeable, it does represent a major reduction compared to current levels to some habitable room windows in Keeley House. In terms of sunlight loss to windows within Keeley House, with the exception of two rooms that would see major reductions, the other windows and rooms would comply with guidance.
- 6.27 Based on the information to date the proposed development is expected to have an impact on the amenities of neighbouring residential properties that could be supported, subject to the positive aspects of the scheme to be brought forward, such as the level of affordable housing and any representation received at application stage.

Mix and Quality of Accommodation Provided

- 6.28 The current proposal is to provide 129 homes. The six ground floor units of the lower block are duplexes with their own front doors on to Frith Road. All other flats are at first floor and above and are single level. The upper floor flats in each block are access via a single core with no more than six flats per core. The floor plans form part of a design pack and are not scalable (not unusual at this stage) so limited assessment can be made on the quality of the proposed units or the developments compliance with accessibility standards.
- 6.29 Croydon Local Plan 2018 (adopted February 2018) policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms.

Policy DM1.1 allows for setting preferred mixes on individual sites via table 4.1. While the provision of 20% 3-bedroom or larger units is the policy target for sites with a PTAL of 4 or higher within in a 'Central' setting, Table 4.1 only requires a minimum of 5% for sites in the defined Retail Core area of the Croydon Opportunity Area. The site does lie within the defined retail core and therefore the proposal meets the 5% minimum Local Plan target for 3-bedroom or larger units for the sites location.

- 6.30 It has been made clear that minimum floor areas (London Plan and National Standards) must be complied with and the private amenity space must meet the minimum required size relevant to the unit.
- 6.31 Dual aspect units should be maximised and single aspect units should only be provided where they are considered a more appropriate design solution to meet the site optimisation requirements of London Plan Policy D3. The current proposal would provide 67% dual aspect units and 33% single aspect. The proportion of single aspect units may seem relatively high, but in the context of a dense scheme delivering mainly one and two bed units in line with the requirements of Table 4.1, and given the shape of the site which results in a relatively shallow depth of building with limited opportunity for set-backs, it is not unusual for the proportion of single aspect units to be higher than would be considered desirable. In this particular case none of the single aspect units are north facing and the applicant has worked hard by breaking the scheme into two blocks to seek to maximise dual aspect homes. The applicant will need to demonstrate that these units will have adequate passive ventilation, daylight and privacy, and avoid overheating. Overall, subject to the above, the proposed mix and layout of units is considered an appropriate design solution in meeting the site optimisation requirements of Policy D3 of the London Plan. It is also worth commenting that the existing building provides 55% of single aspect units, so would be a significant uplift.
- 6.32 Regardless of the final layout, daylight adequacy analysis must be submitted to illustrate that all habitable rooms within the development proposals will achieve the minimum target ADF values set by BRE Guidance.
- 6.33 Preliminary landscaping plans have been provided demonstrating that communal amenity space and playspace would be provided within the courtyard and on the roofs of both decks. Further detail is required and the final layout and quantum of external amenity space is yet to be confirmed, but an initial assessment indicates that if all these spaces are utilised to their full potential then the playspace standards set out in the Local Plan should be met.
- 6.34 The main communal entrances to the proposed blocks are well situated and clearly visible from the street. The number of entrances and communal courtyard space provides a good level of activity.
- 6.35 The applicant is aware that housing should cater for residents' changing needs over their lifetime and that 10% of units would need to be wheelchair accessible and 90% adaptable. It is noted that two lifts are included in the taller 18-storey block and one in the lower block. The applicant should note D5 of the London

Plan in relation to the need for a fire evacuation lift per core, and a fire statement will be required as part of any formal submission (D12 of the London Plan). A meeting has been provisionally reserved for a discussion on fire safety with Croydon's Building Control team to ensure this is resolved prior to submission.

- 6.36 The impact of noise and air quality on residential amenity will need to be considered, especially as the surrounding roads make up a busy part of the road network. The applicant will need to demonstrate how internal areas and balconies achieve an acceptable standard, accordingly noise and air quality assessments are expected with any future application.

Affordable Housing

- 6.37 The applicant has indicated that given the cladding and structural issues identified in section 4 above, the affordable housing offer should be based on uplift only. Therefore given 129 units are currently proposed with 95 existing units on site, this would mean delivery of 35% of the 34 units as affordable housing. For this to be Local Plan compliant, vacant building credit (VBC) (Policy DM3.1) could be utilised which allows for affordable housing to only apply to the net increase in floor space.
- 6.38 The applicants are still to submit their final affordable housing offer and to date no viability report has been submitted to interrogate inputs. A meeting is set up with the GLA to understand their position on the potential for applying flexibility.
- 6.39 Whatever the outcome the scheme will need to be viability tested (on the basis it will not meet 35% fast-track on site or potentially utilise VBC). Whilst officers acknowledge the special circumstances of this scheme, our current position is that the offer needs to be policy compliant, so a minimum of 30% with the correct tenure split, or by utilising VBC and being on uplift only.

Highways

- 6.40 The roads around the site (i.e. Drummond Road, Frith Road and Keeley Road) operate as a one-way road that loops around the site in a clockwise direction. All the roads around the site are within the Central Croydon Controlled Parking Zone.
- 6.41 The site is situated in an area with an excellent public transport accessibility level of 6b. The Centrale Shopping Centre is adjacent to the site along with its multi-storey car park, a 24-hour public car park with 397 spaces. There are a number of Tram stops within easy walking distance of the site. West Croydon Station is less than 400 metres from the site and East Croydon Station is within walking distance.

Trip generation

- 6.42 No trip generation data for the proposed scheme has been submitted to date, however as the number of car parking spaces within the site will be reduced from 72 to 8 or 9 spaces the scheme is expected to produce a high percentage of bus, rail and walking trips and as such a sustainable travel contribution would be

required. TfL would also provide further input into these matters, and are likely to also ask for a contribution.

Residential Parking

- 6.43 Given the sites highly accessible location and proximity to a major town centre the scheme would be expected to provide only blue badge parking within the site in line with London Plan and Local Plan policy. The applicants have complied with this requirement and only blue-badge parking are currently provided within the development. On the basis the site is within a CPZ, and the development is proposed to be car-free, the developer is happy to enter into a legal agreement that future residents will be prohibited from applying for on-street parking permits, thereby controlling parking availability and parking stress within the CPZ.

Car Clubs

- 6.44 Car club cars provide a convenient alternative to using a privately-owned vehicle. Zip Car operates in the Croydon area. There are six zip cars located within 900m (i.e. within 12 minutes' walk) of the site. A contribution will be required for the expansion of car club provision within the area.

Cycle parking

- 6.45 Based on the current number and mix of units proposed, the London Plan minimum cycle parking standards for the are as follows:

- 175 long-stay spaces for residents.
- 5 short-stay spaces for visitors.

- 6.46 A number of built in cycle storage spaces have been shown in the basement and at surface level. At this stage the storage capacity is not known, but the applicants have been made aware of the above requirements and have indicated their intention to meet them.

Access/Servicing

- 6.47 Access to the basement will remain in its existing location from Keeley Road. As per the existing arrangements for the current development, delivery and servicing vehicles will continue to serve the proposed development from the surrounding streets. It is not anticipated that there will be a significant increase in delivery and servicing trips associated with the uplift of 35 additional dwellings, with demand generally consolidated within the same vehicles that would otherwise service the 95 units in the existing development.

Mitigation

- 6.48 Contributions (starting point being £1,500 per unit) towards improvements in sustainable transport will be required, along with restriction of access to parking permits in the Central Croydon CPZ, car club provision / membership. Highway agreements will be required for all changes to the public highway and the adoption of widened footways. TfL may have further requirements and financial obligation requests.

Environment

Building performance

- 6.49 All major development, such as this, should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions. As this scheme will be referable to the Mayor the whole life-cycle carbon emissions should be calculated through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Heat Risk needs to be managed and water consumption restricted.
- 6.50 As a GLA referable scheme it will need to include a Circular Economy Statement that aims to be net zero-waste.
- 6.51 Given that work is mainly still on going in relation to the townscape and transportation matters the majority of these elements are still being developed and further detail will be known when the scheme is advanced. The scheme should be able to meet these requirements.

Flooding

- 6.52 The site is located within Flood Zone 1. Some parts of the site are identified as being at low risk of surface water flooding resulting from heavy rainfall and surface water runoff. In accordance with Policy DM25.1 and Table 8.1 of Croydon's Local Plan all development on sites at risk from other sources of flooding are required to run a sequential test.
- 6.53 All Major developments in Flood Zone 1 are required to provide a site specific Flood Risk Assessments proportionate with the degree of flood risk posed to and by the development, taking account of the advice and recommendations within the Council's Strategic Flood Risk Assessment and Surface Water Management Plan.
- 6.54 Subject to satisfying the above requirements and priority given to the provision of Sustainable Drainage Systems (SuDS) unless demonstrated to be inappropriate, the principle of residential development would be acceptable.
- 6.55 The applicants have been advised to undertake separate pre-application consultation with the Lead Local Flood Authority (LLFA).

Air

- 6.56 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). As indicated above an air quality report will need to be submitted with any application. This must include how the ground floor residential units, amenity decks and balconies fronting the adjoining roads are suitable from an air quality perspective. Should the development increase air pollution or be located in an area subject to breaches then mitigation will be required.

Microclimate

- 6.57 A wind mitigation report has been submitted that demonstrates that the impact of wind on the scheme and the streets around it would be acceptable with appropriate mitigation. The study identifies potentially stronger than desired winds on the pavement on the corner of Keeley and Drummond Roads and potentially on some of the corner balconies within the scheme and on any rooftop amenity spaces. However wind levels would not be severe and can be satisfactorily mitigated through measures that can be introduced into the scheme. These must be designed in pre-submission and not left as a retrofitted afterthought.

Trees

- 6.58 There are no significant trees within the site and only limited areas of planting. There is one small and very young birch tree located on the sites Frith Road frontage within one of the limited planting areas. There are currently no street trees on any of the sites frontages. The current proposal affords the opportunity to significantly increase the existing sites landscaping and the opportunity to introduce new street trees along the sites frontages. The applicant has indicated their willingness to do so and initial landscaping proposals look positive but further detail is required.
- 6.59 It is understood why an 'Urban Greening Score' has not been produced at this stage, but evidence will be required showing how a future scheme meets the Urban Greening Factor minimum target to 0.4.
- 6.60 There are no street trees immediately adjacent to the site. The addition of new street trees to improve greening and biodiversity would be encouraged.. Dialogue with the TfL (as they are situated on a red route) would be required in relation to this matter.

Other Matters

- 6.61 Both the NPPF and London Plan Policy seeks to create safe, secure and appropriately accessible environments where crime, disorder and fear of crime do not undermine the quality of environment. Any future application should be mindful of Secured by Design principles and improve natural surveillance / lighting of the area.
- 6.62 In line with Policy DM16 of the Croydon Local Plan (2018) a health impact assessment will need to be submitted with the planning application.

Mitigation

- 6.63 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions are forthcoming in relation to the Heads of Terms, but it is anticipated that these would 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)
- Air Quality contribution
- Zero carbon offset (if required)
- Future connect to District Heating Network
- Car parking permit restrictions
- Car club provision and membership (3 years free)
- Transport for London contributions
- Sustainable transport contributions (to include cycling enhancements)
- Travel Plan
- Public realm delivery and maintenance
- Street tree provision and maintenance
- Highway 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 acceptability of redevelopment to provide an increased number of dwellings on the site.
2. The amount and distribution of scale/bulk/height across the site, particular in the context of adjoining heritage assets.
3. The design approach and elevational detail including materiality.
4. Any potential impacts on neighbouring residential amenities in terms of light, outlook and privacy.
5. The mix and standard of the accommodation provided.
6. The affordable housing provision, potential use of VBC and whether any weight should be given to these particular circumstances.
7. The importance of urban greening and biodiversity.

8 PROCEDURAL MATTERS

8.1 The applicant has submitted a pre-application to the GLA for an opinion on the proposals. Meetings with the GLA are yet to take place, but LBS officers will be in attendance.

AP1: BRE Guidance Terms

Daylight to existing buildings

The BRE Guidelines stipulate that the diffuse daylighting of the existing building may be adversely affected if either:

- the vertical sky component (VSC) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value (or reduced by more than 20%), known as “the VSC test” or
- the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value known as the “daylight distribution” test.

Sunlight to existing buildings

The BRE Guidelines stipulate that the sunlight of an existing window may be adversely affected if the centre of the window:

- receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of annual winter probable sunlight hours between 21 September and 21 March (WPSH); and
- receives less than 0.8 times its former sunlight hours (or a 20% reduction) during either period; and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

If one of the above tests is met, the dwelling is not considered to be adversely affected.