

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 21/02912/FUL
 Location: Citylink House, 4 Addiscombe Road, Croydon, CR0 5TT
 Ward: Addiscombe West
 Description: Demolition of existing building and redevelopment of the site to provide a part 14 storey and part 28 storey building with basement, comprising 498 co-living units and associated communal amenity spaces (Use Class Sui Generis), 84 residential units (Use Class C3), commercial space (Use Class E) and flexible commercial and community space (limited uses within Use Class E/F1/F2) at ground/mezzanine level, together with roof terraces and balconies, wheelchair accessible parking spaces, refuse and cycle storage and associated landscaping and public realm works including removal of subways. Works include stopping up of section of highway on Altyre Road and subway to No.1 Croydon, 12-16 Addiscombe Road under Section 247 of the Town and Country Planning Act 1990 (as amended)

Drawing Nos: See Appendix 1
 Applicant: Wittington Investments (Properties) Limited
 Agent: DP9
 Case Officer: Louise Tucker

Accommodation	Shared living units	1 bed 2 person	2 bed 3 person	2 bed 4 person	3 bed 5 person
Shared living market rent (Tower Building A)	498	N/A	N/A	N/A	N/A
Intermediate housing (Shoulder Building B)	N/A	40	10	24	10
Total	498	84			

	Type of floor space	Amount existing	Amount proposed
Existing building	Education – Use Class D1	2,632sqm	0
Existing building	Offices – Use Class B1(a)	2,669sqm	0
28 storey tower (referred to as Tower Building A in this report)	Shared living – Use Class Sui Generis		22,040sqm

	Public Cafe - Use Class E(b)		319sqm
14 storey shoulder building (referred to as Shoulder Building B in this report)	Residential – Use Class C3		7,733sqm
	Community Use – Potential Use Classes F1 (a-g), F2(b), E(e)		275sqm
	Total	5,301sqm	30,367sqm

	Number of car parking spaces	Number of cycle parking spaces
Tower Building A	0 spaces	334 long stay spaces for Tower A (with 55 spaces for hire cycles)
Shoulder Building B	3 blue badge disabled spaces	149 long stay spaces
Total	3 blue badge disabled spaces	483 long stay spaces (with 26short stay spaces within the public realm)

1.1 This application is being reported to Planning Committee because the ward councillors (Cllr Fitzsimons, Cllr Hay-Justice and Cllr Fitzpatrick) made representations in accordance with the Committee Consideration Criteria and requested committee consideration, objections above the threshold in the Committee Consideration Criteria have been received and the scheme proposes more than 200 new residential dwellings.

2.0 BACKGROUND

2.1 The scheme was presented on two occasions (April 16th 2020 and 6th August 2020) to the Place Review Panel (PRP) at pre-application stage. The main issues raised by the Panel were as follows:

- With regard to the concept of co-living, the Panel were broadly supportive of the concept of co-living but expressed concerns at the number of nearby similar developments and whether there was sufficient demand. They felt that the communal spaces should be scrutinized with evidence that they can perform for the number of occupants proposed. (*OFFICER COMMENT: The applicant's research into co-living and analysis of their scheme against existing benchmarks has continued, as well as further justification of need against schemes already consented.*)
- The Panel overall welcomed that kitchens were provided on each floor. Further feedback highlighted that it was vital that the building includes a range of high quality shared facilities at the right quantity (including external amenity spaces), and enables social interaction between residents for their physical and mental wellbeing, and to mitigate for the small unit sizes. The Panel also requested the applicant to consider the co-living accommodation in terms of storage for individual units, back of house space requirements and deliveries and servicing. (*OFFICER*

COMMENT: Use and variety of communal spaces as well as storage and back of house requirements have been further refined.)

- In terms of design and townscape impact, the Panel were broadly comfortable with the mass of the tower but felt that a 9 storey massing option for the shoulder was more appropriate in townscape terms, responding to its setting and integrating with the lower scale residential to the south as well as reducing wind impact on the roof terrace. The Panel were broadly supportive of the emerging architectural expression but stressed the importance of the success of the detailing of the façade and its longevity particularly given the light tones of the concrete proposed. *(OFFICER COMMENT: The evolution of the scheme has resulted in an increased height of Shoulder Building B, primarily as a result of the reduction in width to accommodate the trees and to maximise the amount of affordable housing in the scheme. The height and architectural expression have been carefully considered by officers.)*
- The Panel were supportive of the public access café at ground floor level and encouraged the applicant to explore how to attract people into this space. They however felt that the ground floor design was disappointing in terms of its relationship to the street and public realm. They challenged the applicant to improve the spaces around the building as well as the ground floor expression, and stressed the importance of understanding how the scheme ties into the wider context of Croydon. *(OFFICER COMMENT: The base of the building has undergone further testing to ensure it works successfully and have proposed this area for delivery of public art to introduce further activation and identity.)*
- The Panel felt sustainability, microclimate and fire safety need careful consideration. They requested the applicant to look into reducing the amount of north facing units to maximise daylight. *(OFFICER COMMENT: The number of north facing units has been reduced through changes to the layouts. Sustainability, microclimate and fire safety have been considered and can be managed through condition.)*

2.2 Since presenting to the PRP, the proposal has been further developed in consultation with officers and the above comments (where possible) have been addressed in amendments and additional justification provided for the scheme. See 2.6 below.

2.3 An earlier iteration of this proposal was presented to the Planning Committee at pre-application stage on 15th October 2020. This proposed the erection of a part 27/part 13 storey building to provide approximately 494 shared-living units (sui-generis), 77 residential dwellings (C3), flexible (D1/B1) floorspace and retail/café (A1/A3) space.

2.4 The main issues raised were as follows:

- Members had differing views with regards to the design and massing of the towers. Some Members liked the design and commented that it fits in with local character, whilst some Members did not like the design and raised concerns about the colour and materiality as well as concerns about respecting the NLA tower. Some Members queried whether the design was eye-catching or iconic enough for such a prominent location, and some felt the building was too big in its current form where it occupied the full extent of the site. Some Members commented that the use of colour for elements of the tower should be explored, and whether this could be used to provide differentiation between the co-living and the C3 tower. *(OFFICER*

COMMENT: Further pre-application design development and testing of alternative options for both the weave design, colour and materiality were carried out which helped refine these 3 elements. The current scheme is considered to be the most successful tested.)

- Members were unhappy about the loss of the high quality trees to the east of the site in the scheme which was presented. *(OFFICER COMMENT: the building has been stepped back in width from Addiscombe Grove to ensure these trees can be retained.)*
- Members questioned the shared living concept and its need in Croydon discussing the tenancy periods, affordability and number of residents in the building and who this would serve in the community. The amount of outside amenity space and disabled home provision was challenged. Some Members raised concerns about co-living generally in the current Covid-19 climate, and challenged the applicant to demonstrate how the co-living units could convert to traditional C3 residential units if co-living is not a success. Members further challenged the applicant to demonstrate safe fire evacuation. *(OFFICER COMMENT: The applicant has included wheelchair accessible units within the co-living accommodation, and provided research and analysis to back up their co-living offer including justification of need. The applicant has tested their co-living layouts both in a COVID-19 scenario and in a C3 Use Class conversion scenario. A fire strategy has been provided with the application.)*
- Whilst Members welcomed the principle of C3 affordable housing delivery in addition to the co-living accommodation, there was discussion about the affordability of the accommodation it being of all of intermediate tenure and concerns that this would meet a certain demographic only. *(OFFICER COMMENT: Officers continued to robustly test scheme viability supported by independent review through the course of the pre-application and application process to consider the possibility of social rented accommodation or additional affordable housing. Through this process it is considered the offer is the maximum reasonable that can be achieved.)*
- Members were generally supportive of the removal of the underpass. Members reiterated the importance of the pedestrian routes in and around the development given the amount of people who will live in the building, and emphasised that transportation issues will need to be carefully considered. Members also highlighted that wind must be addressed as part of the scheme submission to ensure public realm is safe and fit for purpose. *(OFFICER COMMENT: Officers sought microclimate assessment at pre-application stage to ensure any required mitigation could be incorporated into the design. Transport issues relating to co-living and development as a whole have been considered and addressed by conditions and s.106 obligations.)*

2.5 Since the Committee presentation, the proposal has been further developed, in consultation with officers and the above comments have been taken into account (where possible) in amendments made to the scheme.

2.6 The key changes as a result of PRP and Committee feedback are as follows:

- The evolution of the scheme has resulted in an increased height of Tower Building A and Shoulder Building B. This has primarily been to maximise provision of

affordable housing in Shoulder Building B and to improve the height relationship between both buildings (greater differentiation in heights between the two) and reduce overall bulk, particularly in views from south to north. The reduction in width to accommodate the trees has also resulted in a height increase of 1 storey since the Committee presentation to ensure provision of affordable housing was not reduced. The height and massing have been carefully considered by officers and it is considered the current scheme is acceptable.

- The building has been set back from Addiscombe Grove to allow the 3 prominent and high quality London Plan trees fronting the street to be retained. A detailed arboricultural assessment and method statement has been provided to demonstrate how the trees will be retained and protected during construction given the close proximity of the building.
- The base of the building and ground/floor mezzanine spaces have been developed throughout the pre-application and application. Testing has informed the shape and width of the columns and the 3 entrances have been amended to introduce a degree of symmetry in their appearance, as well as to manage microclimate impact. The canopy over the café has been re-designed to better integrate with the façade approach in response to PRP comments. More landscaping has been introduced surrounding the east and west ends of the building to manage microclimate impacts and provide greening. A residential unit proposed within the mezzanine level has been removed to improve the relationship with the street and remove a poor quality unit. The base of the building is proposed for delivery of public art to introduce further activation and identity.
- Since the PRP presentations, officers challenged the applicants to provide affordable housing on site with the expectation that this should meet C3 Use Class policy requirements. 30% is now proposed as London Living Rent in addition to 70% Shared Ownership which whilst all of intermediate tenure, is considered to be the maximum amount that can be achieved. Scheme viability has been independently reviewed which supports this conclusion. This is considered to be acceptable given that on-site affordable housing would not normally be delivered as part of a co-living scheme.
- The applicants carried out further testing of the weave design, materiality and colour as well as the differentiation between the two towers following PRP and Member comments (particularly in response to comments from Members relating to the building not appearing iconic enough). This included an option with a horizontal weave (as opposed to vertical) to add visual interest, however this lacked the benefits of the verticality of the current weave design in increasing slenderness of both buildings as well as over-complicating the simplicity of the design. Using small ceramic tiles was also tested as an alternative material option but again added busyness to the façade which was considered to compete with the crispness of the weave design. Options for introducing a bolder colour (such as a dark green to reflect the existing building) were also discussed with officers, but were considered to provide too much of a contrast with the NLA Tower and were discounted to ensure the landmark prominent status of the NLA Tower was retained. Some elements from this testing have been carried through, including the slightly differentiation in concrete colour between the buildings, refinements to the crown and corner columns and treatment of the opaque concrete panels with a pattern reflecting the NLA Tower.

- With support from PRP and Member comments, officers continued to seek a microclimate assessment to be provided at pre-application stage so any wind impacts and required mitigation could be managed and incorporated at an early stage. The number and location of points tested, the surrounding development included and the type, siting and scale of mitigation proposed has been improved during pre-application and application stage as a result of officer feedback.
- Analysis of the co-living accommodation and assessment against policy H16 of the London Plan (2021) has been carried out by the applicants and assessed by officers. The amount of dedicated kitchen/dining space, amount of cooking stations as well as defining the variety and types of amenity spaces has been amended. Consideration of co-living in a COVID-19 environment has been made to demonstrate how this could operate.

3 RECOMMENDATION

3.1 That the Planning Committee resolve to GRANT planning permission subject to:

A. Any direction by the London Mayor pursuant to the Mayor of London Order

B. The prior completion of a legal agreement to secure the following planning obligations:

Affordable housing

1. Affordable housing – 84 C3 Use Class residential units (70% London Shared Ownership and 30% London Living Rent) (the entirety of Shoulder Building B)
2. Affordable housing review mechanism (early and late stage review)
 - Reviews on Shoulder Building B - any uplift, flipping to LAR/AR
 - Reviews on Tower Building A - any uplift, flipping C3 to LAR/AR and/or top up payment

Shared living

3. Co-living management plan
4. Units all for rent with minimum tenancy lengths of no less than three months (and other co-living policy requirements including concierge, bedding and linen changing and/or room cleaning services)
5. Operator to be agreed and detailed management plan submitted prior to occupation including security, kitchen stations, booking systems

Public Realm

6. On-site public realm – paving, trees, planting (provided prior to occupation, maintenance and delivery, materials/public realm design to correspondence to the Public Realm Design Guide, remain open and usable to the public 24/7)
7. Off-site public realm improvements to be covered under Section 278 – design and delivery of cycle land adjacent to site and raised table crossing to west of site, installation of trees within the public highway (subject to installation feasibility to be assessed during design stage), reconstruction of footways adjacent to the site, installation of loading bay, installation of road markings and associated traffic orders if applicable (all costs borne by developer including public realm maintenance commuted sums and maintenance of trees and planting to be secured through contribution)
8. Infilling of subway (requirement to undertake stopping up process under Section 247 of the Town and Country Planning Act 1990 and submission of

detailed schedule of works, carry out and complete works to satisfaction of highway authority prior to occupation)

Transport

9. TfL financial contribution of £155,553 towards improvements and upgrades to the local public transport network
10. Remove access for future residents to CPZ permits and season tickets for Council car parks
11. Financial contribution to car club space improvements of £25,000
12. Membership to car club for residents for 3 years for each unit
13. Travel Plan monitoring for 3 years and monitoring fee of £1,969
14. Active Travel Zone improvements (to a minimum value of £50,000)
15. Delivery and Servicing Plan bond of £20,000, retained by Council and used towards highway infrastructure if compliance with DSP not achieved. Delivery and servicing to be monitored for 18 months following 80% occupation of both blocks.
16. Refuse collection – to be carried out by a private management company for both co-living and C3 accommodation. Company, no. of collections to be agreed but cost of private collection for the C3 to be covered entirely by co-living operator.

Design

17. Retention of scheme architects
18. Public art on site (to a minimum value of £100,000)
19. Public access to upper floor on at least one occasion per year
20. Playspace contribution of £11,551
21. Marketing and fitting out of the public café and community space on ground/mezzanine floors for the eventual end occupier. Marketing strategy for both units to be submitted, to include 6 months marketing and further marketing period if no success within this time. Fit out specification to be provided once end users identified, and once approved carried out prior to occupation of each unit.

Environmental

22. Air quality financial contribution of £12,928
23. Carbon offsetting contribution of £592,800
24. Future district heat network connection
25. TV satellite dish mitigation
26. Wind mitigation works

Employment and training

27. Local Employment and Training strategy (LETS)
28. LETS contributions of £70,000 for construction phase and £15,514 for operational phase
29. Monitoring fees
30. And any other planning obligations considered necessary

- 3.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the detailed terms of the legal agreement, securing additional/amended obligations if necessary.

Conditions

1. Commencement of the development within 3 years
2. Development to be carried out in accordance with the approved drawings

Both Tower Building A and Shoulder Building B

Pre-commencement

3. Archaeology - Stage 1 and Stage 2 Written Scheme of Investigation
4. Archaeology – Submission of public engagement framework for sites archaeological program of work
5. CEMP for biodiversity
6. Thames Water – piling method statement
7. Typical façade materials and detailing – 1:20 details used then to produce 1:1 mock-ups, with 1:5 details to confirm following approval
8. 1:1 mock ups of the Crown, Tower A and B portion showing interface, and of the amenity levels and window/sill details
9. External facing materials, including physical samples and detailed drawings of design elements
10. Public Art strategy, designs and implementation (brief and commissioned pieces for both the colonnade and the elevations including physical samples)
11. Details of public realm and landscape design
12. Tree planting and management strategy
13. Vehicle Dynamics Assessment with hostile vehicle mitigation and anti-terrorist measures
14. Construction logistics plan and method statement
15. Construction Environment Management Plan
16. Aviation warning lights (including construction)
17. Sustainable urban drainage strategy (detailing any on and/or off site drainage works)
18. Secured by Design/engagement with the Police
19. Accord with Air Quality Assessment and submission of air quality Low emission strategy
20. Biodiversity enhancement strategy
21. Confirmation of vehicular and pedestrian access rights into rear of site from Addiscombe Grove across access road shared with Harrington Court

Pre-occupation

22. Thames Water – water infrastructure study
23. Hard and soft landscaping, including rooftop amenity spaces, children's playspace and equipment, boundary treatments and planters (including detailed sections with proposed planting)
24. Public realm and building lighting scheme and to include night time illumination and wildlife sensitive lighting design
25. Landscaping and public realm management and maintenance strategy
26. Details of fenestration of the ground floor, including shop fronts, glazing, signage zones and co-ordination and enhancement of the public realm
27. Lighting and CCTV of bin and bike stores, parking areas
28. Details of cycle parking and storage (including staff provision, changing facilities and short stay spaces)
29. Access routes and signage for pedestrians, cyclists and cars

30. Refuse store and collection management plan including details of refuse management company appointed
31. Detailed delivery and Servicing Plan to be submitted
32. Car park management plan (including EVCP)
33. Rooftop amenity for both towers to be agreed including mitigation
34. Window ventilation systems and sound insulation
35. Biodiversity enhancements
36. Café and co-living kitchens extraction details
37. Details of air handling units/plant/machinery and screening
38. Building maintenance strategy including window cleaning

Compliance

39. Co-living elements to be under single management
40. Use of ground and mezz floor as café/community space/co-living reception as per this report
41. Restriction on hours of use of non-residential uses
42. 35% CO2 reduction on site
43. BREEAM excellent for non-residential
44. All features and materials must comply with Part B of the Building Regulations in relation to fire safety
45. Parking spaces, disabled parking, cycle parking installed in accordance with the approved details prior to occupation
46. Public accessibility of areas within the building to be provided as specified
47. Compliance with fire statement, detailed design of fire strategy
48. Accord with contaminated land assessment
49. Applicant to keep watching brief and development shall stop if unexpected contamination found, LPA notified and appropriate remediation agreed, carried out and verified
50. Accord with mitigation outlined in Noise Assessment
51. Noise from air and plant units should not increase background noise
52. Accord with submitted Residential Green Travel Plan
53. Meanwhile strategy, plan and implementation if required
54. In accordance with submitted energy strategy
55. In accordance with air quality assessment
56. In accordance with ecological appraisal

Tower Building A specific

Pre-commencement

57. Final details of number and details of kitchen stations, booking systems for amenity areas within building and smart lift system, typical unit entrances

Pre-occupation

58. Details of cycle hire scheme for residents only, details of adaption to public use if required

Compliance

59. Minimum co-living floorspace - total amenity, kitchen and dining areas, laundry, gym spaces, terraces including rooftop
60. Maximum co-living floorspace - co-working space, plant areas as specified in the application
61. Co-living facilities to be for use by residents only

62. Units on each floor to be DDA compliant as specified

Shoulder Building B specific

Pre-occupation

63. Any extract systems for community use

Compliance

64. 10% of units M4(3) and 90% M4(2)

65. Community use retained as per this report for lifetime of development

66. Use classes applied for and no others within those uses classes

67. 110 litre/person/day water consumption target

68. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Material/detailing conditions information
- 4) Code of practise for Construction Sites
- 5) Light pollution
- 6) Requirement for ultra-low NOx boilers
- 7) Thames Water informatives
- 8) Site notice removal
- 9) Environmental health
- 10) Network Rail informatives for lighting, noise and vibration
- 11) Archaeology informatives
- 12) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.3 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3.4 That the Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the East India Estate and Central Croydon Conservation Areas as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3.5 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

3.6 That if by 16th March 2022 the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.

4.0 PROPOSAL AND LOCATION DETAILS

Proposal

4.1 The application seeks permission for the following:

- Demolition of the existing building on site with the erection of a part 28 (for clarity, to be referred to as Tower Building A within this report), part 14 storey building (for clarity, to be referred to as Shoulder Building B within this report).
- Tower Building A comprising 498 co-living (also known as shared living as per policy H16 and referred to as such within this report) units for rent (Class Sui Generis)
- The co-living tower would contain 3,095sqm of co-living communal amenity space including 1,448sqm of communal catering facilities, 293sqm of dedicated co-working space at mezzanine floor level and 329sqm of communal outdoor space on Floors 13, 14 and 28 (plus a communal balcony on each floor equating to 144sqm total). A lounge/reception for residents is proposed at ground floor, with offices and parcel room. A public café (Use Class E(b)) at ground/mezzanine floor level of 319sqm is also proposed.
- Shoulder Building B comprising 84 residential units (Use Class C3) made up of 40 x 1 bedroom 2 person, 34 x 2 bedroom and 10 x 3 bedroom units.
- The C3 shoulder building would provide 100% affordable housing (84 flats - equating to 30.8% of the whole scheme by habitable room) with roof top garden amenity space for residents on Floor 13. Ground and mezzanine floor to include 275sqm of non-residential floor space (Use Classes F1 (a-g), F2(b), E(e-f)).
- The provision of 3 blue badge disabled parking spaces at the rear, accessed through the existing shared vehicular access road off Addiscombe Grove.
- The provision of 334 cycle parking spaces for Tower Building A and 149 spaces for Shoulder Building B at basement level accessed via lift from ground floor level with visitor spaces for both buildings located at grade in the adjacent public realm.
- Public realm improvements, including the removal and infilling of the existing subway and provision of street trees, planting and pedestrian footpaths.



Image 1: CGI from outside East Croydon Station

4.2 During the course of the application, amendments and additional information were provided by the applicant as follows:

- Removal of mezzanine level C3 residential unit

- Additional kitchens added to communal areas of co-living and additional analysis of co-living accommodation carried out to justify proposals, including comparison with College Road scheme. Clearer separation between public/private areas and definition of primary uses of each amenity space.
- Amended ground floor entrances
- Submission of relocation strategy for educational use including correspondence with existing Business School, submission of planning application for change of use
- Indicative layouts for community floorspace to demonstrate different types of end users who could occupy
- Incorporation of additional Secured by Design measures internally and externally including CCTV, building management measures, rear gates
- Amended drainage strategy and additional clarification to satisfy LLFA comments
- Amended energy strategy and additional clarification, circular economy statement to satisfy energy comments
- Further transport information - detail on cycle store capacity and types of storage, comparison with servicing in similar developments, aligning proposed plans with Council's plans for highway improvements in the area
- Refuse strategy amended to incorporate private collections and avoid bins being stacked up on rear access path

4.3 Re-consultation on the above amendments took place for 3 weeks in the same terms as the original consultation carried out.

Site and Surroundings

4.4 The site is located on the southern side of Addiscombe Road and is currently occupied by offices and Fairfield School of Business. Directly opposite the site is No.1 Croydon, a locally listed building which is also a locally designated landmark and falls within two local designated views. To the rear of site are residential flats/houses facing Addiscombe Road and Altyre Road. The site lies within high/medium risk of surface water flooding. On the corner of Altyre Road, opposite to the site, is an office building.



Image 2 and 3: aerial photos of site, outlined in red

4.5 The surrounding area is mainly a mixed commercial and residential character and there are several developments in the near vicinity such as 28-30 Addiscombe Grove (Pocket), Land Adjacent to Croydon College (College Tower) and the Ten Degrees (Former Essex House) which is now completed. Works are due to commence soon on the demolition of the former Royal Mail Sorting office building to the north, whilst works to Menta Morello continue on site beyond.



Image 4: CGI showing surrounding schemes in context

Constraints

- 4.6 The site is within the Croydon Opportunity Area (Edge Area – covered by policy DM38.4) and Croydon Metropolitan Centre. 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.

Planning History

- 4.7 There is a substantial amount of planning history on the site (and indeed surrounding sites), but the following applications are considered to be of most relevance:
- 4.8 Citylink and Tolley House – 2-4 Addiscombe Road:
 14/03407/P - Alterations; Use ground to fourth floors for flexible B1 (office)/D1 (educational) use – Permission granted
- 4.9 28-30 Addiscombe Grove (Pocket):
 17/02680/FUL - Demolition of existing buildings including parking garage and redevelopment of the sites for a part 9, 20 and 21 storey building comprising 153 residential dwellings (Class C3) and a single storey sub-station; hard and soft landscaping, cycle and car parking facilities; plant areas and other ancillary works – Permission granted. Works are nearing completion on site.
- 4.10 30-38 Addiscombe Road (L&Q):
 18/06102/FUL - Redevelopment of the site to provide 137 residential units across an 8 and 18 storey building with associated landscaping and access arrangements – Permission granted. Works have commenced on site.
- 4.11 Land adjacent to Croydon College, College Road
 19/04987/FUL - Redevelopment of the site to provide a part 49 storey and part 34 storey building with basements, comprising 817 co-living units (Use Class Sui Generis) within Tower A and 120 residential units (Use Class C3) within Tower B, a cafe (Use

Class A3), community use (Use Class D1), associated communal facilities for co-living residents, amenity spaces, cycle parking, disabled parking spaces, refuse and cycle storage and associated landscaping and public realm works – Planning permission granted. Works have commenced on site in pursuance of this permission.

5.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of a part 28/14 storey building comprising residential and co-living accommodation with commercial uses at ground floor is supported in principle and aligned with the desire for growth on the Croydon Opportunity Area.
- The existing educational floorspace on the site is to be partially re-provided as part of the scheme, and the applicants have worked with the existing tenants to find a new premises. In the context of a flexible permission, this is considered to be acceptable.
- Co-living is an emerging residential product, the principle of which is supported by London Plan Policy H16.
- The provision of C3 residential is fully supported, all of which would be of intermediate tenure in the form of London Shared Ownership and London Living Rent (equating to 30.8% by habitable room) which has been independently assessed as the maximum reasonable provision.
- The mix of units is supported by the Registered Provider delivering the accommodation and includes a portion of family accommodation in Shoulder Building B.
- The application site is situated within an appropriate location for a tall building; the height and mass of the two buildings has been assessed in relation to its impact from a wide range of viewpoints and found acceptable, including in relation to its impact on heritage assets in particular the NLA Tower.
- The design, appearance and detailed façade treatment of the development is of high quality as required for tall buildings.
- The provision of public realm improvements including the removal of the pedestrian underpass to provide a new loading bay is supported.
- Whilst there would be some harm to the amenities of surrounding occupiers, these would not be so unduly harmful as to refuse planning permission on this ground.
- The living standards of future occupiers are satisfactory (in terms of overall residential quality) and the C3 Use Class homes would comply with the Nationally Described Space Standard (NDSS).
- The level of parking and impact upon highway safety and efficiency would be acceptable, subject to conditions and s.106 agreement.
- The environmental impacts, including wind, noise, air quality, biodiversity, trees, land contamination and flooding, are acceptable subject to mitigation proposed through a combination of conditions and s.106 agreement.
- Sustainability aspects have been properly assessed and their delivery can be controlled through planning obligations and planning conditions.

6.0 CONSULTATION RESPONSE

6.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

6.2 The following organisations were consulted regarding the application:

The Greater London Authority (Statutory Consultee)

6.3 The GLA have made the following comments:

- The development is supported in principle, subject to further information on the loss of office floorspace and the existing further education institution.
- While the quantum of communal amenity space is broadly supported, the applicant should consider providing more cooking stations within the communal areas on each floor. Furthermore the applicant must confirm that the co-working floorspace included as part of the communal amenity provision would be secured for exclusive use by the residents.
- The provision of on-site conventional affordable housing is supported in principle, however the 31% affordable offer only comprises intermediate tenure and does not comply with policy. The viability continues to be scrutinised by the GLA to ensure the maximum amount and optimum tenure balance.
- The application site is situated within an appropriate location for a tall building. Further information is required to address the functional and environmental impacts of the tall building. The applicant should also address the concerns raised in relation to residential quality, children's play space, fire strategy and inclusive design.
- Safety concerns in the vicinity of the site must be addressed, details relating to the position of the loading bay confirmed and the amount of cycle parking increased for compliance with the strategic transport policies. The trip generation and mode share should be revised in order to determine an appropriate contribution towards public transport to mitigate the cumulative impact.
- Further information on energy, whole life-cycle carbon and circular economy is also required.

OFFICER COMMENT: Continual engagement with the GLA has taken place throughout the pre-application and application process. As a result of discussions with the GLA during the application, the applicant proposed amendments and additional information to overcome their concerns. Follow up comments from the GLA have been received which are as follows:

- Further information on the relocation strategy has been provided by the applicant. It is understood that there is now a very realistic prospect that the existing educational provider will soon secure another premises to operate from within Croydon. GLA officers accept that the existing educational use benefits from a flexible office/educational consent which is due to expire in 2024 and that the proposal includes a smaller communal/educational use on the site. The loss of the existing further education college may therefore be accepted on balance when GLA officers come to consider the public benefits of the proposal at the Mayor's decision making stage.
- The applicant has confirmed that the co-working amenity floorspace would be for the exclusive use and access of the residents. The Stage 1 response encouraged the applicant to explore the potential to provide more cooking stations on each floor. The applicant has responded positively to these comments by providing an additional cooking station on each level, resulting in 24 more cooking stations being provided within the development. Consequently, GLA officers are satisfied with the quantum of communal facilities offered for the future occupiers.
- Additional information has been provided by the applicant to support its case that the scheme is providing the maximum amount of affordable housing subject to review mechanisms. The applicant should nevertheless detail why the affordable component would only consist of intermediate tenure units.

- The Council should undertake a full review of the fire strategy and ensure it is appropriately secured by condition.
- Further information regarding energy required.
- Conditions and s.106 obligations are recommended.

OFFICER COMMENT: The applicant has provided a response to the GLA; this includes further justification on why social rented accommodation cannot viably be provided, and dealing with technical energy matters raised, including additional provision of PV panels and updated site heat network drawings. Officers are content that sufficient information has now been provide to address GLA concerns, in combination with conditions and s.106 obligations.

Transport for London (TfL) (Statutory Consultee)

6.4 TfL made the following comments:

- Proposed improvements to the public realm will make a positive contribution.
- Wind and crime should be taken into consideration.
- The quantity of long stay cycle parking for the co-living units should be increased by 150 spaces to meet London Plan standards.
- A public transport contribution of £155,553 towards service capacity enhancements is requested.
- Details to be provided including for cycle parking, parking management plan, EVCPs, DSP and CLP.
- Restriction on future residents from applying for permits in the local CPZ should be imposed.

OFFICER COMMENT: additional transport information has been provided in response to the comments made by TfL which they are currently reviewing, including further justification on why additional cycle parking cannot be provided. Specific concern was raised by TfL as to wind environments around East Croydon Station; the microclimate assessment provided has been reviewed in detail by officers and is considered to result in acceptable wind environments, subject to the mitigation being secured. The Secured by Design officer has been consulted on the application and a meeting held with the applicants and the Council, resulting in a number of measures being proposed to improve site safety and perception of crime. The transport impacts are discussed in detail below, and conditions and s.106 obligations imposed as recommended by TfL.

Lead Local Flood Authority (LLFA) (Statutory Consultee)

6.5 The LLFA have no objection (further information was received to address these initial concerns) and is satisfied that a detailed sustainable drainage scheme can be suitably secured through a condition [*OFFICER COMMENT: condition imposed*]

Environment Agency (Statutory Consultee)

6.6 No response from the Environment Agency was received.

Historic England – Archaeology

6.7 The archaeology team at Historic England considered that the site holds a discernible geo/archaeological potential. The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. A two stage

condition is recommended requiring firstly evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation *[OFFICER COMMENT: conditions imposed]*

Natural England

6.8 Natural England had no comments to make on the application.

Thames Water

6.9 With regards to foul water and surface water network infrastructure capacity, Thames Water raised no objection. An informative is recommended to advise the developer that Thames Water underground water assets are located within 15m of the development, and water mains crossing or close to the development. Thames Water have requested a condition be imposed, requiring the developer to liaise with them to discuss the impact on the existing water network infrastructure, and whether upgrades are required to accommodate the development. *[OFFICER COMMENT: informatives and conditions imposed]*

Network Rail

6.10 Network Rail recommend the developer complies with informatives to maintain the safe operation of the railway and protect Network Rail's infrastructure, due to the close proximity of the proposed works to Network Rail land. Informatives recommended relating to lighting and noise and vibration *[OFFICER COMMENT: informatives imposed]*

Metropolitan Police Service (MPS) – Designing Out Crime Officer

6.11 The Designing Out Crime Officer initially raised an objection to the scheme. As a result a meeting has been held with the Designing Out Crime Officer and the applicants, and further information and amendments to the scheme have been provided. Final detailed matters can be resolved through the imposition of a condition, requiring liaison with the MPS once an operator has been secured and prior to occupation. This particularly relates to the security arrangements for the building (including size of the security team) *[OFFICER COMMENT: condition recommended. As discussed below in more detail, resolution of certain items such as the fencing and gates proposed will need to be discussed post-determination to ensure any resulting impact is considered, whilst balancing the need to provide a safe environment in and around the site.]*

National Air Traffic Services (NATS) Safeguarding

6.12 No objection was raised.

Heathrow Airport Safeguarding

6.13 No safeguarding objections. Condition recommended for aviation warning lights for cranes. *[OFFICER COMMENT: Condition imposed]*

Gatwick Airport Safeguarding

6.14 No objection was raised.

London Fire Brigade

6.15 No response received.

7.0 LOCAL REPRESENTATION

7.1 The application has been publicised by way of letters of notification to neighbouring properties in the vicinity of the application site. Site notices were also erected in the vicinity of the site and a press notice published. A re-consultation in the same terms took place following submission of revisions to the scheme including the removal of a C3 residential unit, the addition of extra kitchens and the submission of a number of amended and additional documentation in support of the application (see above for full list). The number of representations received from neighbours in response to notification and publicity of the application are as follows:

No of individual responses: 167 Objecting: 158 Supporting: 5 Comment: 4

7.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Comment	Officer comment
Objections (material)	
Overdevelopment of the site	Addressed in this report
Character and design – too high, streetscene impact, existing building should be retained	Addressed in this report. The existing building is not physically protected and there is no in principle objection to its loss.
Co-living – co-living not appropriate, units too small, COVID concerns	Addressed in this report
Impact on NLA Tower	Addressed in this report
Loss of employment site, more commercial space needed, loss of business school	Addressed in this report
Impact on neighbours – daylight/sunlight, privacy, noise and disturbance, lighting	Addressed in this report
Inadequate affordable housing	Addressed in this report
Increased traffic, inadequate access	Addressed in this report
Wind concerns	Addressed in this report
Impact on trees	Addressed in this report

Construction noise and disturbance	Addressed in this report
Failure to provide cycle path round building	Addressed in this report. A cycle path adjacent to the site forms part of the Council's aspirations for the area. The delivery of the cycle path directly adjacent to the site by the applicant is to be secured in the s.106 agreement.
A two way cycle path should be incorporated around the building	This is not proposed as part of this development.
Insufficient infrastructure to support development	Addressed in this report. The development will be subject to a significant CIL payment which contributes to infrastructure.
Increased criminal activity	Secured by Design considered in this report.
Objections (non-material)	
Loss of view	Not a material planning consideration
Devaluation of property prices	Not a material planning consideration
Comments relating to use of access road to Harrington Court	This is a private matter between the applicants and owners of the access road. A condition has been recommended to secure details of the access arrangements.
CCTV should not face Harrington Court	This is a private matter between the applicants and the neighbouring site.
Support (material)	
Well designed and thought through scheme	Addressed in this report
Delivery of much needed housing	Addressed in this report

7.3 Cllr Fitzsimons has objected and referred the application to Planning Committee for a decision, raising the following issues:

- Loss of key employment site and proposed application delivers inadequate levels of employment
- Height of the building and impact on NLA Tower

- Inadequate amount of affordable housing and the high rate of return for micro-flat
- Inadequate size of each flat: student style accommodation
- Streetscene and failure to provide a cycling path around the building
- Privacy issues: Flat will be opposite office blocks and more privacy is needed for occupiers. Flats with private amenity spaces have balconies with metal railings, which again fail to provide flat occupiers with an adequate level of privacy.
- Daylight and sunlight issues on neighbouring properties

7.4 Cllr Hay-Justice has objected to the application and referred the application to Planning Committee, raising the following issues:

- Concur with the request to refer this application to the Planning Committee and object to the application on the grounds raised by Cllr Fitzsimons

7.5 Cllr Fitzpatrick has objected to the application and referred the application to Planning Committee, raising the following issues:

- Adopt the objections which Cllr Fitzsimons has set out

8.0 RELEVANT PLANNING POLICIES AND GUIDANCE

8.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2021, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

8.2 The National Planning Policy Framework (2021) and online Planning Practice Guidance (PPG), as well as the National Design Guide (2019) are material considerations which set out the Government's priorities for planning and a presumption in favour of sustainable development. The following NPPF key issues are in particular relevant to this case:

- Delivering a sufficient supply of homes;
- Making effective use of land;
- Promoting healthy and safe communities;
- Promoting sustainable transport;
- Achieving well designed places;
- Meeting the challenge of climate change, flooding and coastal change

8.3 The main policy considerations raised by the application that the Committee are required to consider are:

8.4 London Plan 2021

- GG1 Building Strong and Inclusive Communities
- GG2 Making Best Use of Land
- GG3 Creating a Healthy City

- GG4 Delivering the Homes Londoners Need
- GG5 Growing a Good Economy
- GG6 Increasing Efficiency and Resilience
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive Design
- D6 Housing Quality and Standards
- D7 Accessible Housing
- D8 Public Realm
- D11 Safety, Security and Resilience to Emergency
- D12 Fire Safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing Housing Supply
- H5 Threshold Approach to Applications
- H6 Affordable Housing Tenure
- H7 Monitoring of Affordable Housing
- H8 Loss of Existing Housing and Estate Redevelopment
- H10 Housing Size Mix
- H16 Large-scale purpose-built shared living
- S4 Play and Informal Recreation
- E11 Skills and opportunities for All
- HC1 Heritage Conservation and Growth
- HC3 Strategic and Local Views
- G5 Urban Greening
- G6 Biodiversity and access to nature
- SI 1 Improving Air Quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy Infrastructure
- SI 4 Managing Heat Risk
- SI 5 Water Infrastructure
- SI 7 Reducing waste and supporting the circular economy
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T1 Strategic approach to Transport
- T2 Healthy Streets
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car Parking
- T7 Deliveries, Servicing and Construction

8.5 Croydon Local Plan (CLP) 2018

- SP1 The Places of Croydon
- SP2 Homes
- SP3 Employment
- SP6.3 Sustainable Design and Construction
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character

- DM10 Design and character
- DM13 Refuse and recycling
- DM16 Promoting healthy communities
- DM18 Heritage assets and conservation
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM24 Land contamination
- DM25 Sustainable drainage systems and reducing floor risk
- SP7 Green Grid
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM38 Croydon Opportunity Area

8.6 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG (March 2016)
- Homes for Londoners: Affordable Housing and Viability SPG (August 2017)
- Croydon Opportunity Area Planning Framework (adopted by the Mayor and Croydon) (2013)
- SPG 12: Landscape Design
- Croydon SPD No. 3: Designing for Community Safety

9.0 MATERIAL PLANNING CONSIDERATIONS

9.1 The main planning issues raised by the application that the Planning Committee are required are as follows:

1. Principle of development
2. Housing quality for future occupiers
3. Affordable housing, mix and density
4. Townscape and visual impact
5. Residential amenity of neighbours
6. Parking and highway safety
7. Trees, landscaping and biodiversity
8. Environment
9. Sustainability
10. Other planning matters

Principle of Development

Site designations

9.2 At the heart of the National Planning Framework 2021 (NPPF) is a presumption in favour of sustainable development which meets social, economic and environmental needs, and attaches great importance to significantly boosting the supply of new housing.

9.3 The site sits within the Croydon Metropolitan Centre (CMC), where Local Plan policy SP3.10 sets out a flexible approach to office, housing and retail uses. The site is also located within the Edge Area of the Croydon Opportunity Area (COA). The Opportunity Area Planning Framework (2013) encourages new homes, the revival of the high

street, and improved streets and amenity spaces. Policy DM38.4 of the CLP (2018) which covers the COA states that in this area, tall buildings can be acceptable subject to achieving a high quality form, design and treatment and where negative impact on sensitive locations is limited.

- 9.4 The principle of a tall building in this location is therefore considered acceptable, subject to meeting the above criteria.

Educational and office facilities

- 9.5 Policy SP5.2 of the Croydon Local Plan 2018 actively encourages the location and expansion of higher and further education in the borough in order to “improve skills and act as a driver of growth and enterprise in the local economy”. Current policy DM19.1 of the CLP (2018) protects community facilities, with their loss permitted where it can be demonstrated there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community.
- 9.6 The Fairfield School of Business (FSB) currently operates on the site, occupying 2,632sqm within the building. This educational use (classed as a community facility) is protected by policy where there is need for this within the Borough, of which there is in this case. Whilst there is 275sqm of educational floorspace (formerly use class D1, now use class F1) being re-provided as part of the scheme at ground and mezzanine floor level of the building, there would be a resultant shortfall of 2,313sqm of educational floorspace compared with the existing situation and FSB would need to vacate the building if the scheme were to go ahead.
- 9.7 There would also be a loss of 2,669sqm existing office floorspace from the building. As set out further below, the site is not located within the Office Retention Area designated within the CLP (2018) and there is thus no protection within the Local Plan for office floorspace within the building. The applicants have stated that the office space has been vacant for around 30 months (other than the ground floor on a short meanwhile lease) despite being openly marketed to potential occupiers since 2019. In this context, it is not considered there is a reasonable prospect at this time of the vacant office space being occupied. In this context, there is no objection to the loss of the office space however the loss of educational floorspace is considered below.
- 9.8 It should firstly be noted that the building benefits from a flexible planning permission, whereby a change of use from the current educational floorspace (use class F1, formerly use class D1) to an office use (use class E(g)(i), formerly use class B1(a)) would be permitted without requiring a further planning permission. The applicant has been engaging with FSB since January 2020 and actively assisting them in finding a new premises based in Croydon borough including instructing two commercial agents to find properties which meet their requirements. Correspondence with FSB has been provided by the applicant showing they are looking for a smaller premises than they are currently occupying. FSB will be vacating Citylink House in February 2022 and it is understood are in the process of agreeing a lease on a new premises in Croydon, keeping this valued educational provision in the Borough. FSB have submitted a planning application (application reference number 21/05856/FUL) for a change of use from offices to educational floorspace at Meridian House, 11 Wellesley Road which is currently being considered by the Council, demonstrating their intentions to move into a smaller premises within the Borough. Whilst these matters are outside of the control of planning, officers consider that this demonstrates that the applicants have made

considerable efforts to work with the existing occupiers to retain this community facility and educational floorspace within the Borough.

- 9.9 Furthermore, whilst smaller in floor area terms, it is considered the proposed community use provided as part of the scheme would offer a viable, high quality unit for a variety of future tenants within a highly accessible location. The applicant has tested a number of layouts for the space to demonstrate its versatility for different end users (with a focus on potential occupiers from the education sector). To accompany this, correspondence from local commercial property agents has been provided who have advised that the layout and self-contained nature of the space is likely to appeal to potential community and commercial occupiers and there is currently good demand in Croydon from use class F1 uses including educational providers. Taking all factors into account, it is considered that a reduced provision of community floorspace as proposed would be acceptable and no objection is raised in respect of policy DM19.1 of the CLP (2018). The future use class of the unit is recommended to be secured by condition (within either Use Class F1 (a-g), F2(b), E(e)) to ensure that this is occupied by a facility that would be beneficial to the community including for provision of education. A further condition/obligation would secure the free fitting-out of this unit for the eventual end occupier to ensure the unit is capable of occupation and operation by the end user, to increase its market appeal and viability for occupation by a wider variety of tenants (policy DM4.3).

Large-scale purpose-built shared living accommodation and need

- 9.10 The proposed development comprises mixed uses but is clearly residential-led, with shared living proposed alongside traditional residential flats. In terms of housing numbers, the site is not allocated and there is thus no specification of the number of homes which the site would be expected to deliver. However, there is an expectation set out within policy SP2 of the CLP (2018) that the Croydon Opportunity Area and windfall sites will contribute towards delivery of a substantial numbers of homes. It also requires land to be used efficiently and address the need for different types of homes in the Borough to contribute to the creation or maintenance of sustainable communities. The supporting text within policy H1 of the London Plan (2021) sets out how large-scale purpose-built shared living accommodation should count towards housing numbers (this is not currently specified within the current Local Plan (2018)). It states that units of non-self-contained communal accommodation (such as large-scale purpose-built shared living) should be counted at a ratio of 1.8:1, when compared with traditional Use Class C3 units. On this basis the 498 co-living units would equate to 276 Use Class C3 residential homes. This, combined with the provision of 84 Use Class C3 affordable homes, would total 360 homes altogether which is considered to constitute a significant delivery of new dwellings and contribution towards housing numbers in the town centre. The site is in a central location with excellent access to public transport, local shops and services and is therefore well placed for a high density residential-led mixed-use development.
- 9.11 Whilst the Croydon Local Plan (2018) is silent on large-scale purpose-built shared living accommodation, Policy H16 of the London Plan (2021) recognises the contribution this type of housing in general can make towards housing supply. Large-scale purpose-built shared living is an emerging type of housing, which does not fall within a traditional residential use class, but is classed as sui-generis use. Whilst Local Plan policy SP2.7 seeks to ensure that a choice of homes is available in the Borough that will address the need for homes of different sizes, there is no specific policy reference to large-scale purpose-built shared living. There are limited precedents for

this housing typology in the UK, with only a small number of operators and there are currently no space standards for such accommodation.

9.12 For large-scale purpose-built shared living schemes to be supported, London Plan policy H16 requires the following criteria to be met (these criteria, along with how the scheme complies with these, are discussed in more detail further in the report):

- “1) it is of good quality and design*
- 2) it contributes towards mixed and inclusive neighbourhoods*
- 3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency*
- 4) it is under single management*
- 5) its units are all for rent with minimum tenancy lengths of no less than three months*
- 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:*
 - a) convenient access to a communal kitchen*
 - b) outside communal amenity space (roof terrace and/or garden)*
 - c) internal communal amenity space (dining rooms, lounges)*
 - d) laundry and drying facilities*
 - e) a concierge*
 - f) bedding and linen changing and/or room cleaning services.*
- 7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes*
- 8) a management plan is provided with the application*
- 9) it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:*
 - a) upfront cash in lieu payment to the local authority, or*
 - b) in perpetuity annual payment to the local authority*
- 10) in both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution, to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review.”*

9.13 Whilst there is a requirement within policy H16 for large scale shared living developments to contribute towards mixed and inclusive neighbourhoods, there is no current policy requirement to justify a need as such for this typology of housing. However, the applicants have produced a housing contribution, need and demand study and economic impact assessment to demonstrate the policy requirement can be met. This discusses potential benefits of the scheme including the potential for shared living units to relieve pressure on the existing conventional housing market. Family homes currently being occupied as HMOs could be returned to use as larger homes of which there is demand for in the Borough. It further highlights the materially higher

average rental values in this central part of the Borough than elsewhere and that shared living units provide a different offer, estimating that the average net rent levels would be accessible to over 60% of full-time working residents in the Borough based on average earnings. The report also notes the existence of the College Road large-scale purpose-built shared living scheme in close proximity (150m to the west), and sets out how the proposed scheme could be argued to meet a different need and different type of resident, given the more frequent common spaces on each floor for daily social interaction with a smaller number of residents, as opposed to larger consolidated spaces. Given there is no policy basis for need to be demonstrated, officers raise no objection to the assessment presented by the applicant.

- 9.14 The site sits within Croydon Metropolitan Centre, outside of designated retail frontage. Therefore, in terms of the ground floor uses, the principle of a community/educational use (limited uses within Classes F1/F2/E) on the ground/mezzanine floor of the shoulder block is acceptable as well as the important function of partially re-providing the lost community floorspace currently on the site (as discussed above). A public café (Use Class E(b)) and large-scale purpose-built shared living reception and resident hub in the ground floor of the tower (Sui-generis use) is also supported, activating the ground floor frontage of this important public route.
- 9.15 Policy DM4.3 of the CLP (2018) seeks to prevent ground floor units outside main and secondary frontages remaining empty, which is applicable to this site. Whilst specific end users have not yet been identified for the ground floor units, the applicant will be required to market the units and provide fitting out for the eventual end occupier to ensure the unit is capable of occupation and operation. This is to be secured within a s.106 agreement. Overall the proposed ground floor uses are considered to complement the surrounding character and activate the ground floor of this key site in close proximity to East Croydon Station.
- 9.16 Taking into account the above matters, it is considered that the erection of a high density residential focussed development within a tall building, incorporating publicly accessible commercial uses on part of the lower floors would be acceptable in principle, subject to compliance with the other policies including meeting the criteria of London Plan policy H16.

Housing Quality for Future Occupiers

Large-scale purpose-built shared living

- 9.17 Large-scale purpose-built shared living is a sui-generis use and therefore not required to meet the minimum floorspace standards as required for traditional C3 Use Class homes. As noted earlier in the report, there are currently no specific standards for this type of housing product, in terms of the units themselves nor the amenity areas. Policy H16 of the London Plan (2021) does however set out some provisions for considering quality which officers have assessed the scheme against.

Unit sizes

- 9.18 Part 7 of this policy states that whilst units must provide adequate functional living space and layout, they must also demonstrably not be self-contained homes nor be capable of being used as such – to remain distinct from traditional C3 Use Class residential accommodation.

9.19 Officers have worked with the applicant to ensure the sizes and layouts of the large-scale purpose-built shared living units strike the appropriate balance. The proposed unit sizes are generally larger than would normally be seen in other shared living developments, where rooms are more comparable in terms of size and quality to student accommodation. For example rooms in developments operated by the Collective are typically 11-16sqm. The proposed room sizes would range between 20-30sqm, with an average of 22sqm. This range has been informed by the applicant's research into other shared living developments both consented and in operation. Whilst there are no set size standards, this is considered to constitute an appropriate middle ground between the size of a room within a typical House in Multiple Occupation (the Council's HMO standards seek a single bedroom of 10sqm) and to the size of a typical C3 Use Class residential studio unit (37sqm) and the ratio of person to area. The proposed unit sizes are also comparable to those within the College Tower shared living development.



Image 5: Sketch images of 4 different layout types proposed for shared living units

9.20 Four different types of unit size and layout would be available across each floor, maximising the choice for residents and enabling a more mixed community. Each unit would be fully furnished with integrated and adaptable storage (approx. 3sqm per unit), including a small kitchenette and en-suite bathroom. It is important to note that the kitchenettes would have limited cooking and food preparation facilities, ensuring the shared kitchen and dining facilities external to the unit are the primary amenities for residents (this is discussed further below). It is also important to note for clarification that each unit is to be occupied by a single person and the proposed floorspace and facilities are provided to meet the requirements of one person occupying the space.

9.21 Whilst there are no specific accessibility standards for co-living accommodation, there is level and lift access to all floors and all communal areas alongside provision of two wheelchair accessible units per floor (making up 10% of the overall units), which will be secured by condition.

9.22 The proposed units are considered to be of good quality and are functional in terms of size and layout, whilst remaining dependent on the communal facilities for primary

living functions. Therefore officers are of the view the units are not self-contained homes nor are capable of being used as such.

Communal spaces

9.23 The second critical element (part 6 of the policy) is the amount, quality and arrangement of the shared communal areas in the scheme. There are no prescribed standards for the size or specification of communal facilities and services for shared living accommodation, nor for external amenity space. However London Plan policy H16 requires these to be sufficient to meet the requirements of the intended number of residents, and offer at least:

- a) Convenient access to a communal kitchen
- b) Outside communal amenity space (roof terrace and/or garden)
- c) Internal communal amenity space (dining rooms, lounges)
- d) Laundry and drying facilities
- e) A concierge
- f) Bedding and linen changing and/or room cleaning services

9.24 Officers have also assessed the above in terms of the likely success in enabling and encouraging social interaction between residents, which is a key part of this housing typology, and to mitigate for the smaller sizes of the shared living units (relative to C3 Use Class homes).

9.25 Commonly, the approach to other shared living developments in operation (or those consented) is to offer amenity in the form of kitchens or lounges for residents on multiple floors throughout the building. The applicants have carried out extensive research into shared living and similar housing typologies both in the UK and internationally. This has also included taking advice from Studio Weave who have carried out extensive research into shared living as an alternative model for housing, who have input into the design and layout of the scheme. Advice has also been taken from CRM (Corporate Residential Management Limited), a UK property management company who are partnering with the developer and operator (Fifth State) to run and manage the building, who have extensive experience in managing a range of accommodation types across the UK and Europe (managing approx. 22,000 units), including shared living developments.

9.26 The layouts and provision of communal amenity have been informed as a result of this research into success of other schemes in operation, input from experienced parties together with the desire of Fifth State as the operator and developer to provide a social environment for residents to build a community and develop a sense of ownership. The resultant proposed communal amenity space is split into the following (internal amenity spaces shown blue in the below visual, external amenity spaces shown green):

- Ground floor: Reception and resident hub/lounge
- Mezzanine: Co-working and lounge space
- Levels 1-12: Resident amenity spaces comprising kitchen, dining and lounge space with balcony
- Level 13: Amenity floor comprising kitchen and dining spaces, gym, spa, yoga studio, laundry/games room, cinema and an external roof terrace

- Level 14: Well-being room and adjoining external roof terrace
- Levels 15-26: Resident amenity spaces comprising kitchen, dining and lounge space with balcony
- Level 27: Lounge, games and event space, external roof terrace

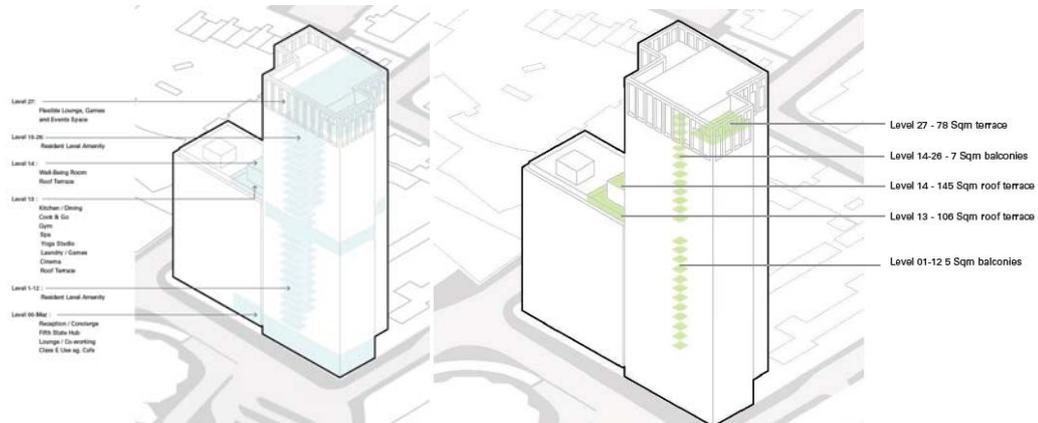


Image 6: Distribution of amenity in Tower Building A

Communal spaces	Size (sqm)
Residents Hub and reception	293sqm
Co-working and mezzanine lounge	293sqm
Communal kitchen/dining on each level (total)	1,092sqm
Communal outdoor terrace on each level (total)	144sqm
Level 13 communal kitchen/dining	356sqm
Level 13 outdoor terrace	145sqm
Spa	47sqm
Gym	80sqm
Yoga/Studio	44sqm
Laundry and games	46sqm
Cinema	45sqm
Level 14 outdoor terrace	106sqm
Well-being room	77sqm
Lounge, games and event space	249sqm
Level 27 outdoor terrace	78sqm
Total	3,095sqm

Table 1: amount of different types of internal and external amenity

9.27 Each floor would therefore incorporate a communal amenity space for residents (with cooking and dining facilities as well as lounge space). These are intended to be more intimate spaces that smaller groups of residents can enjoy and to encourage interaction and sociability between neighbours on each individual floor. These areas are then complemented by larger communal spaces incorporating a range of different amenity functions (with a focus on cooking and dining as is directed by policy H16) provided at ground/mezzanine level, mid-way through the building on level 13/14 and at the top of the building on level 27. These spaces provide essential facilities such as the laundry as well as a variety of other types of social spaces and communal areas including a gym, co-working spaces, cinema and well-being room. The composition and function of these spaces have also been informed by research and questionnaires carried out by CRM and Fifth State for residents across the building to congregate, cook and interact together. Circulation spaces and corridor widths on each floor have been maximised where feasible to encourage social interaction and windows provided where possible to provide natural light. Officers consider the capacity of community spaces to accommodate residents at peak times has been adequately evidenced.

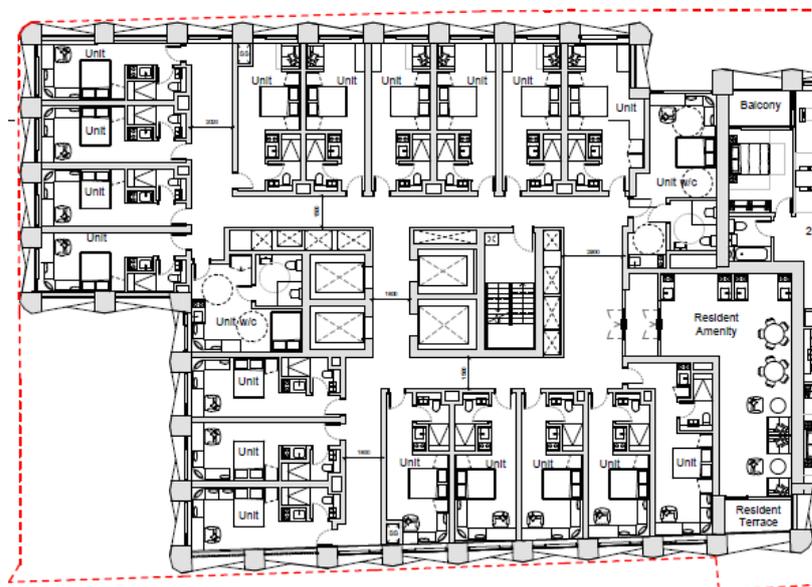


Image 7: typical shared living floor plan – levels 1-8

9.28 “Convenient access to a communal kitchen” is a key requirement of policy H16. To focus on catering facilities specifically, the scheme would provide 1,448sqm of communal catering facilities with 126 communal cooking stations (110 providing both a hob and oven), equating to 2.9sqm per person (note this does not include the kitchenette facilities within each room or the public café at ground floor level which will also provide a food and beverage option) in a variety of different dining options including shared kitchens on the floors throughout the building, larger centralised kitchen spaces and hireable banqueting rooms and cooking/dining areas. For comparison against a consented scheme, table 2 below sets out the scheme compared to the College Tower shared living scheme. The applicant has done a lot of work on the catering capacity of the scheme and it has been increased during the course of the application. Whilst 25% of occupants are able to cook independently at any one time, this must be considered in the context of not all occupants needing to cook at the same time, occupiers eating out (or in the café) and the ability to use a kitchenette in their own rooms. The applicant has evidenced with calculations that there are enough covers to accommodate all residents in the catering spaces at peak times, subject to

staggered use throughout the day. For example, all residents would be able to cook and eat their evening meal in the communal spaces by staggering use into 6 x 45 minute blocks over the peak evening time, with 83 residents cooking and eating in each block. Convenient access to the communal kitchens has been demonstrated through analysis of lift capacities and maximum travel times for residents to catering facilities (noting also that travel times for residents from their unit to the communal spaces on their floor would be minimal).

9.29 In terms of external amenity spaces (which is a policy H16 requirement, although not a prescriptive amount), the communal amenity space on each floor would have a southern outlook with an outdoor balcony. In addition, there are three larger terraces providing external amenity space at levels 13, 14 and 27 directly adjoining the internal communal amenity areas. This is considered to be of acceptable quality and meet the policy requirement objective.

9.30 In terms of the overall amounts of amenity, as discussed above the applicants have utilised input from both Studio Weave and CRM and their experience with shared living and operation of managed buildings as well as a comparison of the amount of amenity space provided within other shared living developments to justify the overall amount and level per person. This includes comparison with the College Tower shared living scheme consented in October 2020. It should be noted that the approach to provision of communal amenity space is distinct from the College Tower shared living scheme. The main difference is the provision within the Citylink House proposed scheme for amenity spaces (including catering) spread throughout the building, as opposed to solely at the top and bottom of the tower as was consented in the College Tower development. This case differs in that the potential future operators of the building (Fifth State and CRM) are on board at application stage and are putting the proposals forward, taking a different approach based on their own research and knowledge and living experience that they want to deliver for residents. Officers are supportive in principle of this provision of a different shared living offer given the relative close proximity of the two schemes in the Borough, and particularly that this scheme provides proportionally more communal amenity space for future residents, as represented below:

	Citylink House scheme (498 units)	College Road scheme (817 units)
Total communal cooking/dining area per person	2.9sqm	1.7sqm
Total communal cooking/dining area in sqm	1,448sqm	1,325sqm
Cooking capacity - total number of kitchen stations	110	130
Dining capacity - total number of dining seats	330 seats (equating to 1.5 per person)	363 seats (equating to 0.4 per person)
Total communal external amenity space per person	0.9sqm	0.7sqm

Total amount of communal amenity space (internal and external)	3,095sqm (equating to 6.25sqm per person)	3,016sqm (equating to 3.7sqm per person)
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Table 2: amenity space comparisons with College Tower scheme

9.31 Notwithstanding the above, given shared living is a relatively new housing typology with limited examples in operation presently, some reservations remain as to the adequacy of the amenity spaces provided, including the variety and arrangement of spaces in terms of supporting a diverse and mixed community in future, embedded in Croydon as a place. This is why the quality of the management plan for the building (as required by policy H16 of the London Plan) setting out the full picture of the use and day to day functioning of the development will be critical to ensure the future success of the scheme and that it operates as intended as a shared living scheme. Whilst an initial management plan has been provided with the application, officers consider it necessary for an updated management plan to be submitted prior to occupation to ensure it is fit for purpose at that time (secured through the s.106 agreement). This should also finalise the uses of each amenity area within the building, to ensure that a variety of uses (with predominant focus on cooking and dining as directed by the policy) is being provided for residents' needs. Whilst Fifth State and CRM will potentially be the future operators in partnership, final confirmation of the future building operator will be secured through the s.106 agreement.

9.32 Overall, in the absence of space or quality standards for this typology, officers are satisfied that the location, size and arrangement of the communal spaces strike the appropriate balance between future occupier amenity and management/maintenance pressures for the future operator. In terms of location, officers see this spread of amenity throughout the building as a benefit to the scheme. Spaces on each floor would minimise travel times and offer convenience for residents when they are wanting to cook/dine throughout the day, as well as offering both smaller informal spaces to socialise with neighbours on their floor and larger centralised areas promoting formation of a community across the whole building. Further to engagement with the GLA and the LPA the applicant has provided additional kitchen stations and further analysis of capacity of the amenity spaces to cater for the amount of future occupants. The quality of the shared living accommodation is considered acceptable, subject to compliance with the management plan.

Other H16 requirements

9.33 The scheme is of good quality and design as covered above and contributes to mixed and inclusive neighbourhoods. The site is located in an area well connected to local services and employment by walking, cycling and public transport and its design does not contribute to car dependency. The proposed number of units per core (20) would be high, but given that shared living is not C3 Use Class accommodation (the standards set by the GLA, generally 8 per core, would therefore not apply) and the development has a fire safety strategy taking into account this number of units (covered below) and fire risk management strategies. Floor to ceiling heights would be appropriate, providing adequate standards in terms of ventilation and overheating. A concierge, along with bedding and room cleaning facilities are to be provided for residents, which is to be secured in the management plan.

9.34 The scheme would be under single management (secured through conditions and s.106 agreement) and the shared living units would be for rent with minimum tenancy lengths of no less than 3 months (secured through s.106 agreement). A management

plan was submitted with the application and securing Fifth State and CRM as the manager and operator is required within the s.106 agreement, as well as provision for detail on the finalised management plan and operation of the accommodation to be required prior to occupation as discussed above.

- 9.35 The overall internal amenity for the shared living units when combining both the floorspace of the units and the communal space averages out as 28.3sqm per person across the whole building. This compares favourably with the Nationally Described Space Standards (NDSS) requirement; with the exception of 1 bedroom homes that demand 37sqm and 39sqm per person, this exceeds the space per person from 2 bedroom homes and larger (25sqm per person for a 1B2P and 20.3sqm for a 2B3P).
- 9.36 Whilst officers are satisfied that the accommodation provided would constitute shared living to an appropriate standard, given this is a new typology the applicant has provided layout plans to show how the floorplates could be converted to C3 residential flats. This is a matter which was raised by Members at pre-application stage. Whilst a conversion would require planning permission, the applicants have demonstrated that the layout could be changed into NDSS compliant C3 Use Class flats without having to re-configure or re-service the entire building. This added safeguard is supported.



Image 8: potential C3 Use Class conversion of Tower A floorplate

- 9.37 The applicant has provided a strategy for operation of the building in a COVID-19 scenario, which was also a query raised by Members at pre-application stage. Dedicated co-working areas and more informal opportunities for desk based working are proposed within the scheme which would support increased levels of working from home if mandated. It has been demonstrated that social distancing on the main communal amenity floor (level 13) could be input if required, including one way systems through the corridors and 2m separation distances between facilities (for example in the gym and cooking areas) to maintain safe spacing. Access to communal areas can be controlled through an 'app', which can also show the number of people using an area at one time which would be useful for residents. Whilst these measures would inevitably reduce availability of facilities for residents in the short term, it is considered there is sufficient capacity built into the scheme to accommodate this, in addition to the facilities and floorspace provided within each resident's own unit.

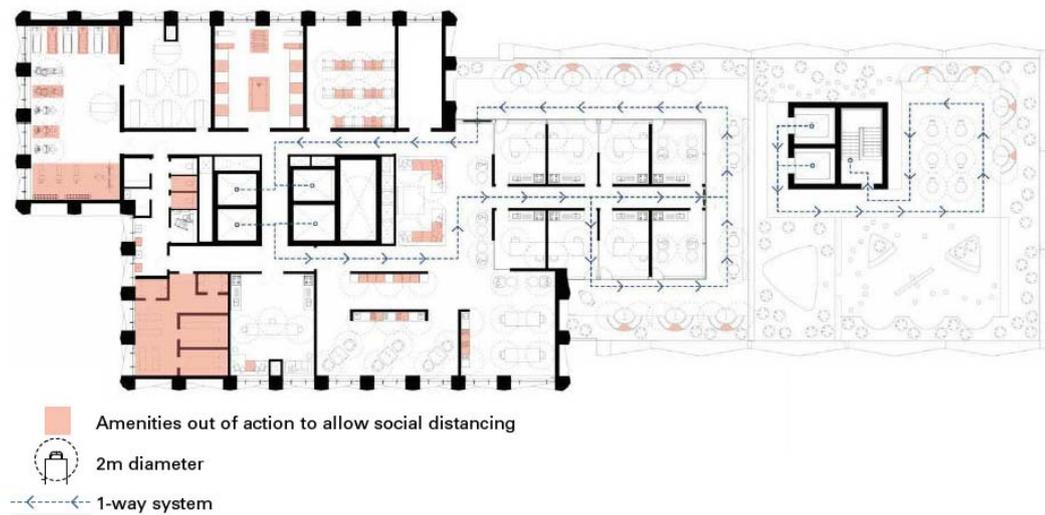


Image 9: Example of how the amenity floors of the building could operate in a COVID-19 scenario

C3 Use Class residential accommodation in Shoulder Building B

- 9.38 All of the proposed new units would comply with the internal dimensions required by the NDSS and would have acceptable layouts and room sizes. Each unit would benefit from an external balcony providing an area of private amenity space. The scheme has been designed to ensure accessibility and inclusivity, with level access and accessible lifts provided. The proposal would exceed the requirement of 10% of units (14 in total) to be wheelchair accessible M4(3) and all others can meet the requirements of M4(2), which is to be secured by condition.
- 9.39 External communal space and child playspace is limited to the roof garden at level 13, which would have a total area of 394sqm. 64sqm can be provided as child playspace. It is not feasible to provide any other external space due to the limited site footprint.
- 9.40 The proposal generates a requirement for 147.1sqm of playspace, of which 78sqm should be for under 5's. The 64sqm provided would be within the communal roof area as this is as close to the units as possible, and is the only feasible way this could be provided within a relatively constrained site. A condition is recommended to control the specific details. This leaves a shortfall of 83.1sqm overall, which cannot be accommodated on site (given the type of play equipment which would be required, and allowing for 330sqm of communal amenity space). The applicant has agreed to provide a financial contribution, based on the costs of equipping an area of approximately 83.1sqm with suitable equipment and including an allowance for future maintenance. Given the site constraints, along with the proximity to the Fair Field which is envisaged to incorporate some play elements, it is considered this is an acceptable approach in this instance to make up for the shortfall of on-site play equipment.

Designing out crime

- 9.41 Policy requires that development proposals should contribute to the minimisation of potential risks, and development should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help defer its effects. The Croydon SPD No. 3: Designing for Community Safety sets out guidance for minimising risk, including maximising natural surveillance; creating spaces which foster a sense of ownership; activity levels; and management and maintenance provisions.

9.42 Engagement with the Metropolitan Police Designing out Crime officers has taken place during the course of the application. In response to concerns raised, particularly arising from the shared living element, amendments and a detailed response have been received which has addressed many of the queries raised. Illustrative plans have been provided incorporating potential crime prevention measures in the public realm e.g. gate, fencing and planting around the cycle lift on the eastern side of the building and gates to the rear parking area. Full consideration of these measures in terms of security but also implications for wind mitigation, retention of the valued trees on Addiscombe Grove and streetscene appearance will require further discussion and resolution post determination through condition. A condition is recommended to capture this and require the applicant to address these matters post determination, along with a requirement to continue engagement with the MPS prior to occupation and discuss Secured by Design accreditation.

Daylight and outlook for future occupiers

9.43 A daylight and sunlight assessment has been provided to assess the living conditions of future occupiers. See Appendix 1 for Daylight and Sunlight BRE Guidance terms.

Shared living

9.44 It must be noted that shared living as a sui-generis housing typology is not strictly subject to the guidelines for access to daylight and sunlight as traditional C3 Use Class homes. The units are defined as non-self-contained, and as such residents are not dependent on the unit for their sole living area and would utilise the communal internal and external areas as an extension to their home. Notwithstanding this, to ensure quality of accommodation, each shared living unit on the first floor (lowest residential floor) was tested for Average Daylight Factor (ADF) to understand daylight penetration into the rooms. Rooms above this were not tested on the assumption that the rooms on the lowest residential floor would represent the worst-case scenario, which is considered an appropriate approach. Testing for daylight is of particular importance given that there are north facing single aspect shared living homes adjacent to the NLA Tower. All shared living homes on the first floor would meet BRE standards for ADF, indicating acceptable levels of daylight would be achieved. Whilst the units have been tested as bedrooms (it is considered these should have been assessed as living rooms which have a higher standard), all units would achieve a minimum 2% ADF anyway exceeding the standards for a living room. This includes the resident level amenity space which would achieve 2.18% ADF which is important given this would be used as a kitchen and lounge area. Whilst there are some north facing shared living units and those which would face towards the NLA Tower and the Pocket Living scheme to the east, the daylighting into the units has been demonstrated to be acceptable.

C3 Use Class accommodation

9.45 In terms of the C3 Use Class units, generally the corner units and central unit on each floor are dual aspect. The south facing flats have unrestricted outlook, leaving 1 single aspect north facing unit on each floor (12 units in total out of 84, or 14% in total). As with the shared living units, each room on the first floor has been tested for ADF on the assumption that this represents the worst-case scenario. All rooms tested would meet the requirements for ADF, indicating adequate daylight penetration into the rooms. Those receiving the least daylight would be two east facing bedrooms facing the Pocket Living scheme, and a north facing bedroom which fronts onto a balcony. However all 3 bedrooms still exceed the 1% ADF target.



Image 10: C3 layout and rooms tested for daylight levels

9.46 Overall there are good levels of internal daylight demonstrated through the development, and during the course of application discussions the number of north facing units across the scheme has been minimised. It is considered that the daylight and sunlight levels afforded to future occupiers of this development would be acceptable.

9.47 Whilst outlook for the proposed units would generally be unrestricted to the south, some units would experience a more reduced outlook to the north and east due to the relationship with surrounding buildings. This is expected to a degree in an urban town centre location such as this and should not unduly restrict development. Where acceptable levels of daylight are achieved and the siting of the NLA Tower and Pocket building would only affect a proportion of units with adequate separation distances, the levels of outlook are considered to be acceptable for future occupiers.

Fire safety

9.48 Although fire safety is predominantly a building regulations issue, policy D12 of the London Plan 2021 requires developments to achieve the highest standards of fire safety for all building users. The policy sets out a number of requirements, with the submission of a Fire Statement (an independent fire strategy produced by a third party suitably qualified assessor) setting out how the development has been designed and will function to minimise fire risk. Discussion surrounding the fire safety proposals have taken place during the course of the application, with officers seeking to ensure this is suitably robust and tailored to this specific type of development whilst also acknowledging the role of Building Regulations in fire safety and that detailed design (in discussion with LFB) is yet to take place for some fire safety measures. Given the sui-generis use class of the shared living accommodation and lack of other precedents for large scale purpose built accommodation such as this, it has been acknowledged that a hybrid approach to fire risk management would be appropriate to support defend in place, phased or simultaneous evacuation of the building if necessary. The applicants have confirmed an evacuation alert system and PA/voice alarm system will be provided to facilitate this, and have confirmed stair widths have sufficient capacity if evacuation was required. This must be provided, with details how this will be

managed during operation of the building to be clarified at condition stage. The applicants have also committed to providing smoke ventilation within the common corridor which will clear any smoke which enters the corridor, which is welcomed. It is considered the submitted details are sufficient to address, at this stage, the development's fire safety implications from a planning perspective. To address some concerns with the location and management of the cooking facilities within the individual units (to ensure that, in the event of a fire, safe means of escape is provided given their siting adjacent to the exit) the applicants have committed to providing a hob suppression system in each unit (which would also be able to cut power to the cooking area in each unit) to mitigate this. This must be provided, along with the smoke ventilation system for the common corridors as specified to achieve the highest standards of fire safety in accordance with the London Plan policy requirements. The development should comply with the fire statement and addendum as an approved document, with a condition recommended to secure full details of fire safety measures once the next stage of design work is complete, including materials and construction methods, evacuation points and any requirements incorporated as a result of discussions with the London Fire Brigade (e.g. specific locations for fire appliance access points and wet riser outlet locations).

Affordable Housing, Mix and Density

Affordable housing

- 9.49 The CLP (2018) states that to deliver affordable Class C3 housing in the Borough on sites of ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rented homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified. The London Plan (2021) sets a strategic target of 50%, but allows lower provision to be provided dependent on whether it meets/exceeds certain thresholds, or when it has been viability tested. It should be noted that as the London Plan (2021) was adopted after the Croydon Local Plan (2018), where there is a policy difference, then the most recently adopted policy should take precedent.
- 9.50 Policy H6 of the London Plan (2021) requires developments to provide 30% as low cost rented homes, either as London Affordable Rent or Social rent, allocated according to need and for Londoners on low incomes, 30% as intermediate products which includes London Living Rent and London Shared Ownership, with the remaining 40% to be determined by the borough.
- 9.51 In terms of shared living, the above policies would not apply as the use class is sui-generis and not C3 Use Class. The only policy covering purpose-built shared living schemes is policy H16 of the London Plan (2021), which requires delivery of a cash in lieu contribution towards conventional C3 Use Class affordable housing. This is because C3 Use Class standards do not apply to shared living and a requirement of registered providers is for homes to meet the national space standards, which they do not. The policy directs that this should be sought either as an upfront cash in lieu payment to the Local Planning Authority (LPA), or by way of an in perpetuity annual payment to the LPA. In both cases the contribution provided is expected to be the equivalent of 35% of the units (to be provided at a discount of 50% of the market rent). This envisages the scenario that a scheme is entirely for shared living.

- 9.52 A key benefit of this scheme is that traditional affordable C3 Use Class residential accommodation can be delivered on site, as opposed to a cash in lieu payment towards off site delivery, which would be the case for a wholly shared living scheme. The 498 shared living units within the tower cannot be secured as affordable housing. However the entirety of Shoulder Building B (84 units) would be provided as C3 Use Class affordable housing, equating to 30.8% by habitable room across both towers (on the basis of one shared living unit equating to one habitable room). This would be entirely of intermediate tenure, split between 30% London Living Rent and 70% London Shared Ownership. The application was subject to a viability appraisal, which was scrutinised independently for the LPA. The results of the appraisal review and testing is that there would be a significant viability deficit, even with the 30.8% offered. It is also important to note that the developer has engaged with Registered Providers and Metropolitan Thames Valley Housing have confirmed their support for the scheme and the mix, which is to be encouraged.
- 9.53 The proposed affordable housing offer is therefore considered the maximum reasonable, providing 57 London Shared Ownership homes and 27 London Living Rent homes with a mix of sizes including family homes, alongside 498 homes for shared living, catering to a different need within the housing market suitable for this highly sustainable location. No additional affordable housing (in percentage or affordable rented terms) could be viably provided, and early stage and late stage review mechanisms are recommended for inclusion within the s.106 agreement to account for any potential uplift. Taking this into account, and that the delivery of on-site affordable housing in a shared living scheme is considered to be beneficial compared to the requirement solely for a financial contribution contained within policy H16, the level of affordable housing is accepted.

Mix of accommodation

- 9.54 Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings. In central settings with high PTAL ratings, the requirement is 20% of units to have 3 bedrooms or more (a minimum of 5% in Retail Core Area of the Croydon Opportunity Area and 10% in 'New Town' and East Croydon as defined by the Opportunity Area Planning Framework). The exceptions to compliance with this policy as set out within DM1.1 is if there is agreement with an associated affordable housing provider that three or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal.
- 9.55 The C3 Use Class accommodation comprises of 40 x 1b2p homes, 10 x 2b3p homes, 24 x 2b4p homes and 10 x 3b5p. Therefore 12% of the C3 Use Class residential units are three bedroom units, which would fall below the associated policy requirement. However in this particular case the applicant is working with an affordable housing provider, Metropolitan Thames Valley Housing, to deliver the affordable homes who have confirmed their support for the scheme including for the proposed unit mix in this location. It is considered this would meet the requirement of part (a) policy DM1.1. Additionally the site is on the very edge of the 'New Town' and East Croydon area as defined by the OAPF (where the requirement for three bedroom homes would be 10%) and the scheme has a significant viability deficit which could potentially be worsened with an associated reduction in affordable housing if further three bed units were required in the scheme. In this context, and that the scheme would still result in the

delivery of 10 good quality affordable three bedroom homes in a highly accessible location, it is considered the C3 Use Class housing mix can be supported.

- 9.56 As the shared living element is sui-generis Policy DM1.1 does not apply. The scheme would deliver a large number of high quality shared living units which are to be occupied by single persons. Overall, officers are satisfied with the unit mix provided within the scheme.

Townscape and Visual Impact

Massing and townscape

- 9.57 The proposed scheme is for a part 28, part 14 storey building in a stepped form. The approach to utilising the western half of the site for the 28 storey tower is considered appropriate, providing more relief from surrounding buildings including the NLA tower, reduced impact on adjoining occupiers and with direct views from East Croydon Station. This also fits with the general upward gradient in the heights of buildings from east to west as you move towards the taller cluster of buildings surrounding East Croydon Station as the below image shows.

Edge Area of the UAHF, as our site.



Image 11: contextual elevation looking north showing development east and west of the site

- 9.58 The massing of the building has been rigorously tested in terms of its townscape impact. Initial concerns were raised by officers regarding the height, in particular of the Shoulder Building B. Emerging schemes in the Edge Area surrounding the site are commonly defined by a tower and shoulder form with shoulder heights ranging from 6-9 storeys, which are generally successful in transitioning from the taller townscape scales surrounding East Croydon to the lower rise buildings to the south which range from 2-5 storeys. This also related to the perceived bulk of the building in north/south views and the potential for detracting from the slenderness of the taller tower. However, design work has taken place over the course of pre-application discussions to introduce a slipped 'Z-like' form to break up the bulk of the tower. Another key change has been a reduction in width of the shoulder block on the eastern side. This has helped reduce the visual bulk particularly in long views from the south where the edge of the NLA Tower is revealed and a more balanced overall width with the taller 28 storey element taking prominence is achieved. Whilst the height would be greater than the NLA Tower, the design of the crown has also been developed to become a more lightweight element retaining prominence of and contrast with the more solid form and landmark status of the NLA Tower in longer views. Balanced against the provision of affordable C3 Use Class housing within the shoulder block and acceptable impact on the microclimate surrounding the site, the massing is considered acceptable.



Image 12: CGI from Addiscombe Road looking south west showing proposed scheme

Elevational Design

9.59 The design approach is focussed on incorporating the Croydon context and mid-century heritage which is supported in principle. Particular inspiration has been taken from the faceted 3-dimensional form of the NLA tower and other post-war buildings in the town centre to create subtle woven forms within the façade which articulate a uniform grid, reflective of the internal layout arrangement. It is considered this approach works well on both a micro and macro scale in short and long range views.

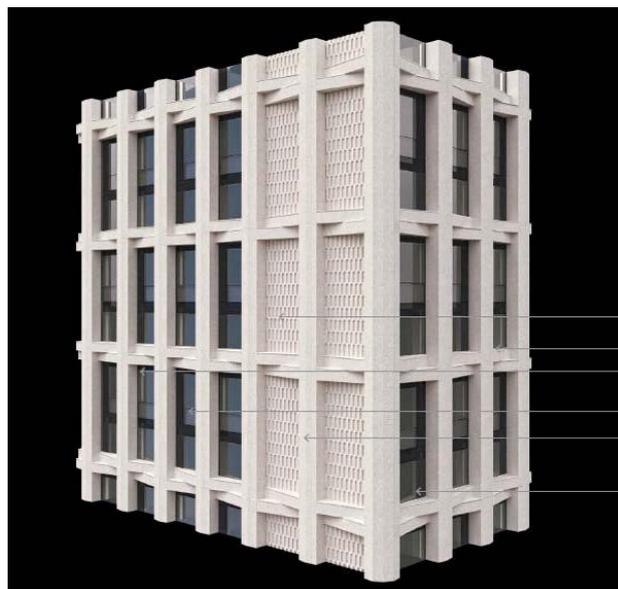


Image 13: typical bay showing weave design

9.60 Officers have worked extensively with the applicant to ensure the 'weave' is articulated robustly on the façade both in form and materiality, and is distinct from surrounding design approaches to give the building its own identity, particularly being in such close proximity to the NLA Tower. This has also been in response to feedback from the PRP and Members at the Pre-application Planning Committee presentation. This work has predominantly included testing of both horizontal and vertical weave patterns of differing size and thickness, use of colour and differing articulations of the building frame and corners. This has resulted in the current woven architectural approach, which officers consider to be of high quality. The design is considered to be successful in terms of achieving a highly detailed and sculptural façade with a strong identity that nods to Croydon heritage, whilst also being sensitive to the bold form and expression of the NLA Tower which it remains subservient to and does not seek to compete with.



Images 14 and 15: elevations showing composition and design rationale for both buildings

9.61 The proposal has a strong repetitive vertical appearance which serves to increase the slenderness of the taller tower element in particular. This is emphasised further by the proportions of the base, body and cap elements of the building as shown above. The two storey base of the building increases the presence of the building at ground floor level and reflects the scale of the tower above. The cap is a continuation of the grid pattern below with a more open lightweight form, incorporating a taller band around the top which comprises an amenity floor. Decorative geometric patterned pre-cast panels on parts of the façade are also utilised to articulate areas with no windows and integrate them with the rest of the building. The two towers are differentiated using the stepped orthogonal form and with a subtle change in material colour (white pre-cast concrete for the tower and grey pre-cast concrete for the shoulder) to give each its own identity whilst appearing as two conjoined forms. Overall officers consider the proposed elevational design to be appropriate. Given the complex nature of the weave pattern and the importance of this being achieved as shown to the overall success of the scheme, a robust set of conditions are recommended to secure key detailing, junctions, fenestration and finishes.

Materiality

- 9.62 The materiality is a palette comprising interlocking pre-cast concrete panels. This has been inspired by post-war architecture and chosen to successfully express the weaved form of the building whilst providing a clean and simplified appearance which does not compete with it. Given the intricate faceted nature of the façade, officers consider this to be acceptable material palette. However the particular tones, texture and quality of both pre-cast concrete types for each tower, coupled with the junction and fenestration detailing as referred to above, will be absolutely critical to successful delivery of the architectural approach. This will also be important with respect to the interaction and contrast with the NLA Tower, as it is important that the building remains respectful and subservient to it.
- 9.63 Officers have highlighted the importance of junction and fenestration detailing in dealing with rainwater effectively (particularly on the northern façade) to avoid the potential for undesirable staining in the recessed parts of the weave over time. Some alternative material testing (for example with terracotta) has been carried out by the applicant team which has demonstrated that concrete appears to be the best option to deliver the woven form on the façade. Drawings of initial sill detailing have also been provided by the applicant team which have given some degree of reassurance to officers, however a detailed set of conditions are recommended to continue this work post-determination.



Image 16: proposed materials

Layout and Public realm

- 9.64 An important element of the delivery of this scheme is the public realm adjacent to the site, given the building extends largely to the site boundaries (other than on the eastern side). This in particular relates to the northern footway, which will function as a busy pedestrian route between East Croydon station and the site, and the Pocket Living homes to the east of the site and others beyond, once occupied.
- 9.65 The applicant has committed as part of the development to infill the underused pedestrian underpass on Addiscombe Road (subject to formal approval under Section 247 of the TCPA (1990) which the applicant will need to pursue) including the removal of ramps on the corner of Altyre Road. This will make significant difference to the experience of the public realm in this area as well as facilitate greater volume and efficiency of pedestrian flows in, out and through the area. Other works on highways land include trees and planting (exact locations to be agreed at detailed design stage), as well as delivery of part of the cycle lane which runs to the north of the site (along Addiscombe Road) and raised table over Altyre Road (as envisaged in the Council's future Masterplan for the East Croydon area). During the course of the application, the width of the shoulder block was decreased to retain the three prominent trees to the east of the site, which has provided some relief on the Addiscombe Grove side as well

as retaining the trees which contribute positively to the visual amenity of the streetscene.



Image 17: proposed block plan

- 9.66 Within the applicant's site boundaries, trees and planters are proposed to the north of the building including some seating and cycle stands. Whilst this is developing in a positive manner and the inclusion of these elements is principally acceptable with a minimum pavement width of 2.4m currently proposed, officers have stressed the importance of and have challenged the applicants to make the northern footway route as wide and visually accessible as possible for a high quality route experiencing high future footfall, and making this as active as possible to ease access through and improve legibility. This is important given the introduction of the future cycle lane adjacent to the path to ensure pedestrians of all abilities can use the footway safely and efficiently. Work on this should continue at condition stage, including consideration of the optimal location and size of trees in the public realm, location, form and size of the proposed planters and their relationship to the entrances, and the most suitable locations for the seating and cycle stands. This is to ensure that these elements contribute positively to the public realm rather than limit use of it.
- 9.67 To support the functioning of the public realm, a double height space and active frontages are being implemented with a community/educational use proposed at the eastern end of the building. A public café use is proposed to the western end of the building, providing public access into the building. Further discussions regarding the specific end users of the units will be held during condition discharge to ensure they are appropriate. Public access to rooftop level once a year is further being secured through the s.106 agreement to maximise public benefit and comply with our tall building policy. In addition, the entrance lobby and residents hub are located to the centre for maximum activation along the whole route.
- 9.68 There is good potential for a significant piece(s) of public art to be incorporated at the base of the building, where the applicant is proposing to deliver it. This will help to elevate and activate the double height base of the building which will become a key part of a busy pedestrianised route, plus also creates an opportunity to provide a sense

of place and further root the building into its locale in Croydon. Whilst the base has been identified as the most impactful location for art to be incorporated, the actual location or type of intervention to be provided is yet to be determined to allow this to be developed into a detailed brief with input from officers post-determination. However the expectation is that this will incorporate the entirety of the base (as defined by the applicant in their documentation). The public art proposals will require an in-depth selection process and for the applicant to write a public art strategy and implementation plan, before tendering to a selection of artists based on the criteria set. Officers request they are able to participate within this process and review final designs and samples of the selected artist. The lighting will have to work with and compliment all elements of the architectural expression and will be developed in collaboration with the emerging designs. Conditions are recommended accordingly, in addition to a suitable budget for the works being secured within the s.106 agreement.

9.69 Policy D4 of London Plan requires proposals to be thoroughly scrutinised for design quality, particularly tall buildings. Whilst the proposed density of the development is high, it is considered that robust scrutiny of the design has taken place both at officer level and also from being reviewed twice by the Place Review Panel. As set out above, amendments and additional information have been incorporated as a result. In addition to this, given the importance of the architectural approach being executed successfully and remaining compliant with policy D4, officers are recommending the ongoing involvement of the current scheme architects, to be secured through the s.106 agreement.

Heritage

9.70 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.

9.71 The NPPF places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets, and affords great weight to the asset's conservation. It states that:

“great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm”

9.72 Any harm to a designated heritage asset, including from development within its setting requires “clear and convincing justification”, with less than substantial harm weighed against the public benefits delivered by the proposed development.

9.73 With regard to non-designated heritage assets, paragraph 203 of the NPPF states that:

“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing...applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

- 9.74 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, and Policy DM15 permits tall buildings which relate positively to nearby heritage assets.
- 9.75 The setting of a building is defined as ‘the surroundings in which a heritage asset is experienced’ in the glossary to the NPPF. “It’s extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance of may be neutral.”
- 9.76 The site is not within a Conservation Area (CA) and there are no statutorily designated heritage assets either on or immediately adjacent to the site. The site does however most notably lie adjacent to a Locally Listed Building, the NLA Tower, and in the vicinity of the Locally Designated View from North End looking east. Central Croydon Conservation Area, the East India Estate Conservation Area and Chatworsyth Road Conservation Area are located some distance away to the west, east and south-west of the site respectively. The development will be visible in the setting of these and some other nearby heritage assets due to its height and form.
- 9.77 A detailed Townscape, Heritage and Visual Impact Assessment was submitted as part of the application. This assesses the impacts of the proposal on a range of nearby heritage assets, accompanied by views. Officers have also undertaken their own assessment of the impacts which are considered in more detail below.
- 9.78 The heritage asset most impacted is the Locally Listed Building, the NLA Tower, to the north of the site across Addiscombe Road which was built in 1970 to a design by Richard Seifert. This building is significant piece of mid-20th century architecture which forms an important part of the development of Croydon at this time. Whilst the building itself would not be impacted by the development, the proposal would impact on its setting which has been carefully assessed by officers. Local Designated Views of the NLA Tower exist from the Central Croydon CA from the west, and from the East India Estate CA from the east.



Images 18 and 19: View from Central Croydon Conservation Area – existing and proposed

- 9.79 From the Central Croydon CA (shown above), the proposed building would sit outside of the designated view and would be entirely obscured beyond the towers of 101 George Street (Ten Degrees). The proposal would therefore have no impact on this view, the setting of the CA or the NLA Tower in this context.



Images 20 and 21: View from East India Estate Conservation Area – existing and proposed

9.80 From the East India Estate CA (shown in the image above), the proposal would be partially visible in this designated view towards the town centre. However the appreciation of the setting of the Locally Listed NLA Tower would not be impacted upon from this viewing corridor, and the proposed building would sit in the foreground of the towers of 101 George Street behind it which are already visible from this vantage point. 101 George Street is set slightly apart from the proposal to the south in this view and is clearly taller, setting the context which the proposed building would be seen within. Taking this into account, it is considered there would be a minor visual townscape impact on the setting of the East India Estate CA which would have an overall neutral impact. There would not be an impact on the setting or landmark status of the NLA Tower from this view.

9.81 The proposal has limited visibility from the north end of Chatsworth Road but can be seen in some longer views from the southern end of Chatsworth Road Conservation Area. It would be seen from there in the context of other built form surrounding East Croydon Station, including Altitude Apartments tower. This would also be considered an overall neutral impact on the setting.



Image 22: Proposed view from the north east along Cherry Orchard Road



Images 23 and 24: Existing and proposed view from the north of the site along Cherry Orchard Road

9.82 The building would most be experienced in the setting of the NLA Tower in views from the north and south. The building can be seen beyond the NLA Tower in views travelling north to south along Cherry Orchard Road (as in the images above) where the buildings would coalesce from some angles, breaking its silhouette to the right, and the proposed height would appear equal to or extend above the NLA Tower in some views further to the south. It is noted this will have some negative impact on the setting of the NLA Tower. However the proposal would form part of an emerging context of tall buildings surrounding the NLA Tower which it would be, and is already seen in the context of. Viewed from street level, the height of the proposal and its complementary and relatively calm façade (alongside the lightweight open nature of the crown) would sit in the backdrop of the NLA Tower and its strong geometric form and silhouette which is still clearly visible against the sky and on the left hand side. None of the views (north or south) of the NLA Tower are designated or are where it is most clearly seen and experienced as a landmark from street level, for example from North End or from outside East Croydon Station. In this context, it is considered that there would some harm to the setting of the NLA Tower as a non-designated heritage asset. The balancing of this harm is discussed below.



Images 25 and 26: Existing and proposed views from the south along Addiscombe Grove

9.83 The view of the NLA Tower would also be impacted upon in views from the south looking north along Addiscombe Grove (image above). The proposed building and the height of the shoulder block would partially obscure the middle section of the NLA Tower. The tower element would sit adjacent to it but at the same time would be distinctly separate, retaining a clear sky gap where the form of the NLA can be seen. During the course of the application, the width of the shoulder block was reduced which allowed the prominent street fronting trees to be retained, but also allowed more of the NLA silhouette to be revealed on the right side of this view. Whilst it is acknowledged the shoulder block particularly would result in some harmful impact to the setting of this

heritage asset by partly obscuring it in this view, the amendments during the application have mitigated this to some extent and the top of the NLA Tower would still be prominent and retain its significance, visible in the context of the variety of surrounding development in the foreground. It should also be noted that this view is not designated for its townscape or heritage significance. It is considered, taking into account the above, that there would be some harm to the setting of the NLA Tower which is concluded on below.

Conclusion on harm

- 9.84 No direct harm to the fabric of any designated heritage assets would occur as a result of the proposal. It is considered the proposed development would have a neutral impact on the designated heritage assets in the site vicinity; the settings of nearby CAs, and in the Locally Designated Views as discussed above. The building would either be invisible from the setting of all surrounding listed buildings or would appear consistent with the cluster of other tall buildings surrounding East Croydon station without a noticeable differential impact. It is considered the statutory tests for preservation of designated heritage assets would be met and there is no need to weigh the harm against public benefits.
- 9.85 As no overall harm has been identified to heritage assets the provision of paragraph 202 of the NPPF to weigh any harm against the public benefits of the scheme is not enacted. However, for the avoidance of doubt the development does deliver a number of public benefits, including housing provision, a quantity of which would be for affordable housing delivered on site including wheelchair accessible homes, an improved public realm, including the infill of the pedestrian subway, cycle path to the north of the site and a raised table crossing to the north west of the site.
- 9.86 There would be some harm to the setting of the NLA Tower. Locally Listed Buildings are non-designated heritage assets and their setting is not statutorily protected nor is their setting a designated or non-designated heritage asset. Setting of Locally Listed Buildings is protected within the CLP (2018), but whilst there would be some harm this would not be significant and on the lower end of the scale, with the threshold to be applied to such a test lower than if the building had a statutory designation. Amendments made during the course of the pre-application discussions and application have improved the design, with specific consideration towards ensuring subservience to the landmark status of the NLA Tower. The proposed public realm works including the underpass removal and introduction of planting would deliver some improvements to its setting at street level. As per requirements of the NPPF, making a balanced judgement as to the scale of harm and the significance of the asset, the impact is considered to be acceptable.
- 9.87 The planning application site lies in an area of archaeological interest. Historic England have advised that required archaeological investigations should be imposed by condition, which are recommended.

Trees and ecology

- 9.88 There are 7 trees within and surrounding the site of good quality (rated category A and B). This includes a Category B sycamore tree in the neighbouring site to the south, which is proposed to be retained with protection measures specified for during construction. It should be noted that there is a historic TPO covering the site (No.25 of 1980), which was imposed prior to Citylink House being built. The only tree remaining of relevance appears to be this Category B sycamore tree, which is being retained and

protected as part of the scheme in any case. This has been discussed with the tree officer who is in agreement and raises no objection.

- 9.89 Most notably visible from the streetscene are 6 prominent mature London Plane trees around the eastern and southern side of the site, which contribute to visual amenity of the area. The 3 southern trees outside the site are proposed to be retained, with protection measures specified in the submitted arboricultural report. The 3 trees on the eastern side were originally proposed to be removed. However, during the course of pre-application discussions and in response to comments from officers and Members at pre-application stage, the applicants have sought to retain these 3 existing trees. This has involved stepping back the eastern edge of the building by approximately 3.5m in line with the existing building (and the eastern wall of the basement level by a further metre to accommodate root spread).
- 9.90 Whilst this move was welcomed, officers have worked with the applicants to achieve a sufficient level of detail on construction methodology for the building and its basement due to the close relationship with the trees, to ensure they are not damaged during the construction process and can survive in the future adjacent to the development. This has included submission of a detailed arboricultural method statement providing details of basement dig area, retaining walls, type and location of building foundations and piling and details of the proposed cantilever section to ensure this is feasible. These measures are considered acceptable to ensure the trees can be retained. These documents are recommended to be conditioned to be complied with, including that the LPA receive copies of the arboricultural supervision visits as specified within the documentation to ensure works are carried out in accordance. The tree officer has reviewed this information and raise no objection.
- 9.91 In addition to retaining the trees on and adjacent to the site as above, there is planting proposed within the public realm to provide further opportunity for greening. This is currently proposed as 5 trees and some large planters in the public realm to the north of the building and a planter and tree to the west of the building (final locations subject to detailed design at condition and s.278 stage), plus other areas of planting surrounding the eastern and western ends of the building. There would therefore be an uplift of tree planting on site to contribute to softening of the appearance of the development and integrating it into its surrounds at ground level which is considered beneficial to the amenity of the area around the site.
- 9.92 Urban greening calculations have been carried out in accordance with policy G5 of the London Plan (2021), demonstrating the site achieves a score of 0.46 made up of the landscaping proposed at ground floor, terrace and roof levels. This includes biodiverse and intensive green roofs, as well as tree planting and climbers. The policy recommends a target score of 0.4 for developments that are predominantly residential, which the scheme would achieve in compliance with this policy.
- 9.93 The NPPF and London Plan policy G6 requires that any development seeks to provide biodiversity net gain. The submitted ecological appraisal shows the site currently has low biodiversity value and as such there are opportunities to achieve this through enhancement measures. This is met with planting (tree planting on roofs with understorey shrubs, herbaceous ground cover and bulbs, biodiverse roofs including a wild flower meadow and habitat features) and habitat creation for birds, bats and insects incorporated into the landscape through log piles and clearings, bird houses, native wildflowers and hibernaculum. Full details of specific measures and their

locations are recommended to be secured through ecological and landscaping conditions, including design of a wildlife sensitive lighting scheme.

Residential Amenity of Neighbours

Outlook and privacy

- 9.94 In terms of outlook and privacy, the most critical relationships to consider are the residential properties to the south and the future occupiers of the nearly completed 28-30 Addiscombe Grove (Pocket) to the east. Properties to the south generally have east/west facing front and rear windows which provide their main outlook so would not have a direct window to window relationship with the proposed dwellings. The two buildings immediately to the south do have windows facing towards the site. Planning history suggests the nearest north facing windows on Harrington Court immediately to the south are non-habitable rooms, with main outlook towards Altyre Road and to the east. 17 Addiscombe Grove (Carnoustie Court) also has windows facing towards the site but the planning history suggests these are secondary windows with main outlook towards Addiscombe Grove and to the west. The nearest buildings which do have a direct window to window relationship would be the northern façade of Harrington Court which faces the site, in excess of 40m from the south facing façade. This would be sufficient to ensure no significant overlooking would ensue. There could be some perception of overlooking from rear amenity spaces (and potentially rear windows) of properties to the south but given these are generally communal amenity spaces with separation distance from the façade, and given the current dense relationships it is not considered this would cause significant harm to amenity. There would be approximately an 18m separation distance to the 28-30 Addiscombe Grove flats which is considered to be provide occupiers with sufficient levels of privacy.
- 9.95 2-8 Altyre Road, an office building, is located to the west of the site. There is currently no consent to develop this site but the proposed scheme would not prejudice this happening in future, with separation distances of approximately 26m between the building facades as proposed.
- 9.96 Overall, given the density of the surrounding built form and closely related development in a central location it is expected that there will be a degree of mutual overlooking and visual impact for occupiers, so is acceptable.

Daylight and Sunlight Impacts

- 9.97 Policy DM10.6 states that the Council will not support development proposals which would have adverse effects on the amenities of adjoining or nearby properties or have an unacceptable impact on the surrounding area. This can include a loss of privacy, daylight, sunlight, outlook or an increased sense of enclosure. There are a number of buildings surrounding the site requiring consideration in terms of daylight/sunlight impact. This is endorsed in D9 of the London Plan 2021.

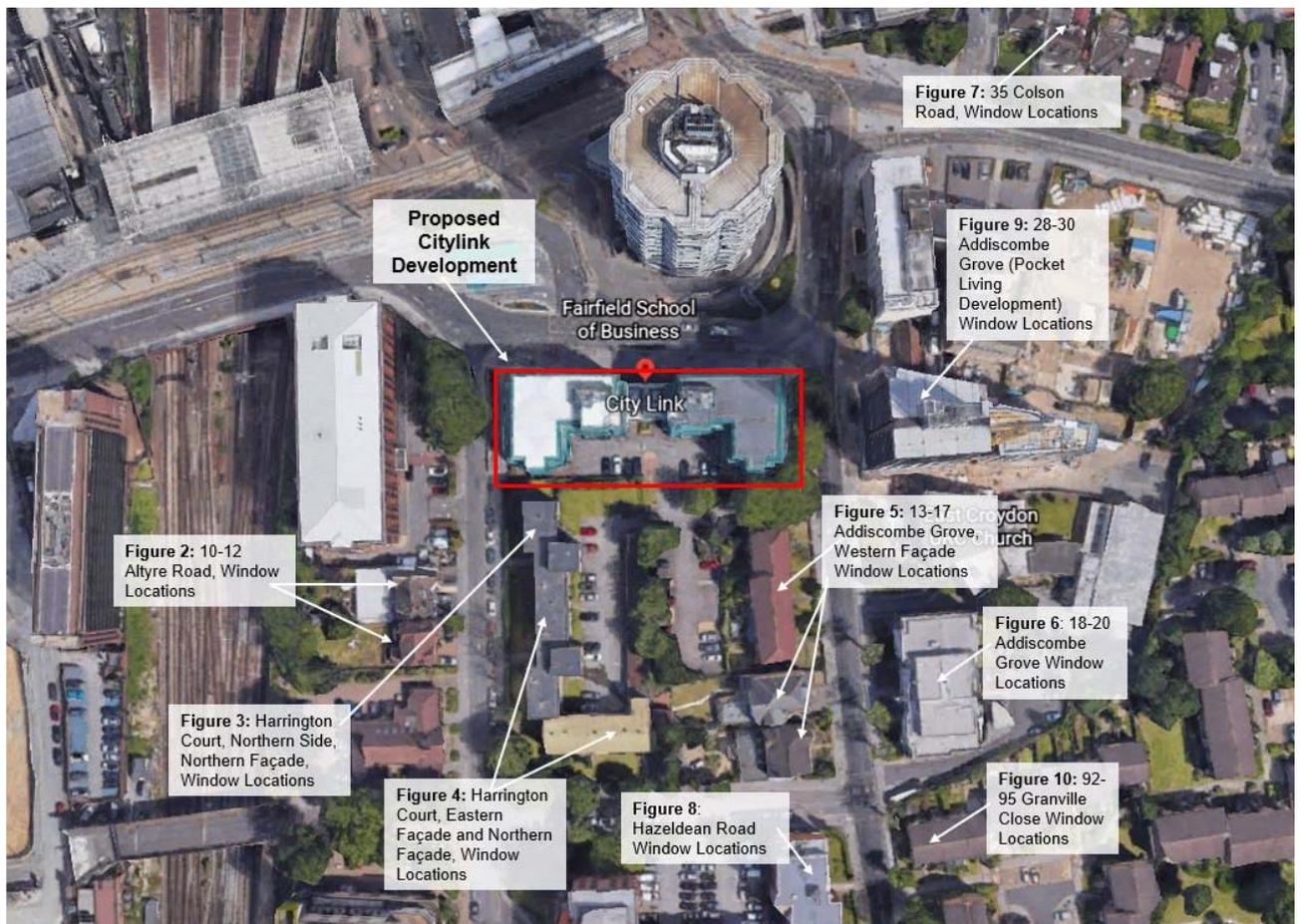


Image 27: surrounding properties assessed for light

9.98 A daylight and sunlight assessment has been provided with the application, assessing the development's impacts on existing and future residents. Daylight impacts on the relevant neighbouring buildings have been assessed with tests for Vertical Sky Component (VSC), and then Daylight Distribution (DD) and Average Daylight Factor (ADF) tests have been utilised where windows have not achieved BRE compliant VSC values to give a further indication of the daylight impact experienced. The daylight impacts have been assessed in comparison to the existing Citylink House building on the site. This is in general considered an acceptable approach.

9.99 Due to the fact that the facades of existing nearby properties with windows potentially impacted by the development are not within 90 degrees due south to the property, no assessment of sunlight at existing properties adjacent to the proposed development has been carried out. This accords with BRE guidance for assessing sunlight availability.

9.100 To clarify, guidance suggests that if the VSC percentage difference is less than 27% and less than 0.8 times its former value then there would be an adverse effect. However, the BRE guidance allows alternative target values and an appropriate degree of flexibility particularly to higher density development, especially in opportunity areas, town centres, large sites and accessible location. It is considered this is the case here and that the BRE standards should be applied flexibly in these circumstances.

Harrington Court

9.101 Harrington Court is a 5 storey block of 57 flats to the south of the development. The VSC results show that out of the 72 windows assessed, 60 (83%) would fully comply with BRE standards. The remaining 17% constitutes 12 windows. 3 of these are in the

eastern façade of the end of the block closest to the site, which would generally experience losses between 20-26% compared to the existing situation which would be classified as a minor adverse impact. Whilst this is noted, the planning history for the building suggests these windows serve kitchens/bathrooms which are not generally considered to be habitable rooms. These windows have also then been assessed for DD to provide a further indicator of daylight availability to which they all meet BRE guidelines. This indicates a minor daylight impact to these windows.

9.102 Windows in a northern façade facing the proposal site would experience greater impacts. 9 out of 12 windows (75%) would not achieve BRE standards for VSC, with 5 windows experiencing reduction ratio of 30-35% which would be classified as a moderate adverse impact (the remaining 4 windows would receive more daylight experiencing a minor impact). As in the eastern façade, these windows have then been tested for DD where 1 remaining window would marginally fail the BRE standards for this test (reduction ratio of 22%). This is a ground floor window in the northern façade which appears to serve a kitchen. This room would however achieve BRE compliant ADF levels, which again has been used here to give another perspective on daylight levels. Whilst it is noted this room would clearly experience noticeable daylight impacts as a result of the development, the results indicate that an adequate amount would remain allowing it to be used for its intended purpose as a kitchen.

9.103 Overall it is considered the impact to this building would be defined as moderate adverse, taking into account the proportion of rooms affected and the extent to which daylight will be lost. The location of these windows facing directly north towards the development and existing poor access to daylight must be noted (the existing VSC for all the windows which fail is already below 27%), being a 4 storey building directly adjoining a deep 5 storey block extending to the north. Taking this into account including the relationship to the existing Citylink House in this relatively dense urban location, the impact is considered to be acceptable.

28-30 Addiscombe Grove

9.104 28-30 Addiscombe Grove is a part 9, part 21 storey residential tower located to the east of the site across Addiscombe Grove. The building is currently under construction and not yet occupied. The impact on daylight/sunlight has been tested for these units with outlook on the west facing elevations towards the site, which comprise a mix of bedrooms and living areas.

9.105 17 windows out of 76 windows (22%) would fail to meet BRE targets for VSC with the existing site as a comparison. These windows are all on upper floors facing the site experiencing reduction ratios of 20-28%, which would be as a result of the increased height of development on the proposal site compared with Citylink House as existing. Of these windows, 5 on the fifth and sixth floors would experience a greater impact failing to pass the 0.8 ratio criteria for DD (worst reduction ratio would be 0.64 or 36% which would be a moderate adverse impact). 4 of these rooms are bedrooms (where daylight is less important) and the other window serves a dual aspect living room/kitchen/dining room. These rooms would all achieve BRE compliant ADF levels.

9.106 It is considered the transgressions from the existing scenario would overall result in a moderate adverse daylight impact on the occupiers of these units, accounting for the proportion of windows affected and the degree to which their daylight would be impacted. Given the existing close relationship between 28-30 Addiscombe Grove and the buildings surrounding it to the north and east including the application site, plus the nature of the rooms/units most affected (bedrooms and dual aspect 1b1p units with

generally open southern aspect) it is considered the moderate failures would be acceptable.

12 Altyre Road

9.107 12 Altyre Road is a residential property located to the south. In carrying out the assessment, the internal layouts are unknown, but all rooms have been assumed to be habitable as a worst case scenario. This is considered to be an acceptable approach. For the VSC test, 12 windows to the rear were analysed for daylight impact, and one window was not compliant with BRE guidelines - W5 on the ground floor (facing the site in a bay window). However, this window would already fail to meet acceptable VSC levels (already below 27%) as existing given its siting and surrounding development and the ratio would be 0.73, equating to a fairly marginal failure. When tested for daylight distribution, this window would pass the NSL test. Whilst this is considered to equate to a minor adverse impact, given that only one window would be most affected and that there are likely two other windows serving the same room which would achieve BRE compliant VSC, the impact is considered to be acceptable.

15 Addiscombe Grove

9.108 This is a 3 storey flatted building known as 'Spring Apartments' on the western side of Addiscombe Grove, comprising of 8 units. 12 windows were tested in the rear of the building which could potentially be affected. One window failed to meet BRE guidance for VSC. Whilst the daylight reduction would be 38% which would be classed as a moderate adverse impact, this is a rear west facing window in a ground floor projection which serves one bedroom in one of the flats. The ground floor projection is closest to the eastern 4 storey flank of Harrington Court to the west which inevitably already has some impact on daylight access. This window comfortably achieves standards for DD with only a very marginal reduction compared with the existing situation. The impact on this building overall is therefore considered acceptable.

17 Addiscombe Grove (Carnoustie Court)

This is a 3 storey flatted block to the south east of the site with west facing rear windows. 4 windows nearest the development at first and second floor level closest to the development would fail to meet BRE guidance for VSC, but it should be noted these would constitute a very marginal failure (20% reduction) and would almost be negligible. Following from that these windows all passed the tests for daylight distribution indicating an adequate level of daylight would be achieved. Given the proportion of windows affected and the extent to which they are affected, it is considered the impact on this building would be minor adverse at worst.

Daylight and sunlight conclusions

9.109 All other properties tested (18-20 Addiscombe Grove, 35 Colson Road, Longitude apartments, 92-95 Granville Close) would all achieve BRE compliant VSC rates compared with the existing situation, and as such have not been discussed in more detail above. The proposed development would clearly result in some daylight impacts for surrounding properties, most notably for occupiers of the southern-most block of Harrington Court and 28-30 Addiscombe Grove. In the vast majority of instances where impacts beyond BRE guidelines occur, the impact would be considered to be minor adverse in nature, with daylight levels already challenging in the location given the existing situation and relationship with surrounding buildings. It should be noted that daylight impacts for surrounding properties beyond BRE guidelines are inevitable in an urban context such as this. All windows would pass either VSC, NSL or ADF tests. Given the benefits proposed by this scheme (including the provision of affordable housing) the harm of these impacts are considered to be outweighed by these benefits.

As such the daylight and sunlight implications of the proposed development for surrounding properties are acceptable.

Microclimate

- 9.110 Paragraph 6.71 of the Croydon OAPF states that new buildings, in particular tall buildings, will need to demonstrate how they successfully mitigate impacts from microclimate conditions on new and existing amenity spaces. In particular, new tall buildings in the COA will need to show how their designs do not have a negative impact on wind (downdrafts and wind tunnelling). This is endorsed in D9 of the London Plan 2021.
- 9.111 A wind tunnel assessment of the impact on the local microclimate has been undertaken. Given the number of consented and/or proposed developments in the vicinity of the site and to fully understand the implications of the scheme in conjunction with all surrounding built form, the wind testing covers a number of different scenarios. The amount and location of testing points was improved during the course of pre-application discussions following officer feedback, for example to include the bus stops and crossing points.
- 9.112 Modelling of the existing site identified no safety issues in terms of wind, and found that the environment was generally suitable for either intended pedestrian activities, including cyclist use, throughout the year. Initial testing at pre-application stage (of a former version of the scheme extending right to the eastern site boundary) of the proposed scheme within existing and proposed surrounds without mitigation measures identified exceedance of safety criteria during winter in some areas at ground floor level (predominantly around the eastern and western ends of the building) and some areas at roof level (the level 13 terrace). Exceedances of pedestrian comfort levels were also found during winter in thoroughfares, entrances, in the café seating area and on the roof terraces. This was attributed to winds funnelling between the proposed building and surrounding blocks and accelerating around the corners of the proposed building.
- 9.113 Discussions on the appropriate level, design and location of mitigation to combat this has taken place during the course of the pre-application and application. The current scheme proposes mitigation in the form of 2m continuous evergreen planting around the eastern end and corners of the building (the retention of the existing London Plane trees also contributing to mitigation) and 1.5m planting around the café, which would also have a canopy to ensure a comfortable seating environment throughout the year. Whilst the planting in terms of height and extent would be sizeable in this area of the public realm, wind conditions within and immediately surrounding the site would then meet the safety criteria and would in general achieve acceptable levels of comfort for pedestrian access to and passage through the site. Entrances along the northern side of the building would be recessed to enable appropriate standing environments in these areas. Mitigation has also been incorporated at roof level (levels 13, 14 and 27) in the form of large trees in planters, along with 1.5m high porous screens around the level 13 and 14 terraces. The amount and height of trees required at roof level would be substantial, and officers have sought further reassurance from the applicant as to whether this planting is achievable. A condition is recommended to secure detailed design of the layout and depth of the planters for all of the terraces to demonstrate that the trees of the size required can be planted and survive long term.
- 9.114 It is considered the design of the wind mitigation would ensure a sufficiently comfortable environment within the surrounds of the development. Implementation and maintenance of the wind mitigation is to be secured through the s.106 agreement, as

well as the detailed design of the tree pits, their management and specific details of planting and canopy to ensure establishment of and longevity of the mitigation measures to perform their function within the wider public realm and amenity spaces.

Highway Safety, Access and Parking

9.115 The site has a Public Transport Accessibility Level (PTAL) of 6b (on a scale of 0 – 6b, where 6b is the most accessible). The site therefore has an excellent level of accessibility to public transport links.

Car parking

9.116 The proposal is predominantly car-free, with the exception of the 3 dedicated disabled bays proposed to the rear which form the extent of the total vehicular parking provision. This level of provision is considered to be acceptable and given the location, would provide a satisfactory level for the wheelchair accessible units proposed. It is noted the London Plan requires a demonstration of disabled spaces for 10% of dwellings, in case these are needed at a later date. Any further provision cannot be achieved on site given the small site area, and any further excavation to provide additional sub-basements (if this was feasible) would impact significantly on scheme viability. There is an additional bay adjacent to the disabled spaces which could be utilised as an additional disabled parking space, however this is to be reserved for use as a short-stay delivery bay which is considered necessary to serve the shared living accommodation in particular. In any case, taking into account that the majority of units are for shared living and that this policy is applicable to C3 Use Class accommodation, it is not considered further parking provision is necessary in such an accessible location. This is supported by the London Plan which directs schemes for large scale shared living accommodation to be provided car free. In the context that the development can meet the 3% requirement for spaces for the C3 Use Class accommodation, the parking provision is considered appropriate. Resident's eligibility for parking permits would be restricted by the s.106 agreement and a Car Park Management Plan relating to the allocation and management of spaces would be secured through planning condition.

9.117 The parking spaces would be accessed using the existing vehicular access to the rear from Addiscombe Grove. This is considered appropriate in line with the existing arrangements for site access shared with the vehicular access to the parking area for Harrington Court, which operates safely at present. Visibility splays either side of the access can be achieved in line with standard highways requirements. Suitable and safe manoeuvring has been demonstrated for vehicles within the site, allowing access and egress to take place in a forward gear. Access arrangements would be secured by Grampian condition. This would need to include confirmation of access across the neighbouring site where the road is shared with the occupants of Harrington Court.

9.118 Local Plan Policy DM30 states that 20% of parking bays should have EVCP with future provision available for the other bays. This would equate to 1 bay being provided with a charging point and future provision being enabled for the 3 other bays (including the servicing bay). Full details and provision of the EVCP are to be secured by conditions.

Cycle parking

9.119 For the shared living accommodation, the applicant has applied the principle of shared living to the cycling facilities. 334 cycle parking spaces are to be provided in the basement for residents of Tower Building A (equating to a ratio of 1 cycle parking

space per 1.5 residents), with 55 of these to be for cycle hire spaces. The requirement of policy T5 of the London Plan for shared living units to be considered as C3 Use Class studio units is noted. However, this does not account for proposals including shared cycle facilities which is considered to be an appropriate fit to the type of accommodation proposed. The 279 long stay cycle spaces would cater for 56% of residents if needed; however these are unlikely to be fully utilised at any one time with some residents inevitably preferring to use the hire scheme which would be available on the same 'app' used to access other shared facilities. As a comparative example, the consented College Road scheme provided 283 cycle parking spaces with 130 of these to be cycle hire spaces, equating to around 1 per 3 shared living residents. Taking into account the limitations of the site area, the type of accommodation (and likely shorter term nature of the rental periods) together with the proximity of the site to public transport, it is considered this proportion of cycle parking for Tower Building A is appropriate. It is important that this hire scheme is only for residents, which will be secured by condition along with the full details once agreed, including provision for retaining the hire scheme but adapted for public use if necessary in future.

9.120 149 cycle parking spaces for the C3 Use Class accommodation in Shoulder Building B would be provided at basement level. The spaces provided would be in accordance with the adopted London Plan standards, which is considered acceptable and the maximum that could be accommodated on the site. Short stay visitor parking for the commercial uses is to be provided within the public realm area (details to be agreed as discussed above), along with staff cycle parking and changing facilities within the basement. Final location, size and layout of staff cycle parking and changing facilities are to be secured by condition to ensure these services are usable and functional. This is considered acceptable.

Car club

9.121 Policy DM30 of the Croydon Local Plan (2018) requires 5% of the total number of spaces to be provided as on-site car club spaces, with additional spaces at a rate of 1 space for every 20 spaces below the maximum overall number of car parking spaces as set out in the London Plan. In this particular case taking into account the location of the site and car club provision already present in the area, as well as the importance of retaining the 4 spaces at the rear for disabled occupiers and servicing requirements, it is considered more beneficial to secure improvements to existing car club infrastructure within the area. The existing provision is considered to fulfil current demand and would still be easily accessible for residents being within walking distance of the site. A financial contribution of £25,000 is therefore proposed to be secured through the s.106 agreement towards 5 electric vehicle charging points to make existing spaces in the area more sustainable. The s.106 agreement would also secure car club membership being paid for the occupiers of the units for 3 years. This is considered to be in accordance with the intentions of the policy, contributing to and promotion of sustainable transport infrastructure.

Delivery and servicing

9.122 A Delivery and Servicing plan has been provided. It is proposed for short-stay deliveries to be serviced from a delivery bay at the rear accessed from Addiscombe Grove (as outlined above), whilst all other loading (including for refuse collection and larger vehicles) would take place from a designated on-street loading bay on Altyre Road. This loading bay would be provided in place of the ramped access to the Addiscombe Road pedestrian underpass, which currently sits in the footway on the northern edge of Altyre Road. Given the relatively constrained nature of the site and unavailability of space at the rear for servicing from larger vehicles, this is considered

to be the only suitable place for loading without harm to the safety and efficiency of the highway. As delivery of the loading bay would require the removal of and infilling of the existing pedestrian underpass, the design and delivery of these works are required to make the development acceptable in planning terms. The loading bay would therefore need to be delivered in parallel to the stopping up of the Addiscombe Road underpass undertaken with reference to Section 247 of the Town and Country Planning Act (1990). The loading bay itself would then be designed and delivered as part of the s.278 works. Both of these elements would need to be secured through the s.106 agreement, with a pre-commencement requirement for the applicants to engage in and gain approval for the works to the underpass through the stopping up process under Section 247 of the Town and Country Planning Act (1990). The works would also need to be approved and delivered to highways standards by the applicant through the s.278 process.

9.123 The applicant has agreed to this approach in principle, with all works to facilitate this to be carried out and funded by the applicant. Subject to going through due process to gain approval for this and providing suitable mitigation for the loss of the pedestrian route from Addiscombe Road to the NLA Tower (discussed further below), officers consider the infill of the pedestrian underpass could be acceptable. The underpass is currently underutilised and its removal has been proposed as part of the Council's wider aspirations for improved pedestrian and cycle accessibility surrounding East Croydon Station. The loading bay in the location proposed would not impact on any existing on-street car parking on Altyre Road and could be controlled with a traffic regulation order to limit the duration of stay (to be determined as part of the detailed design). Officers consider this element of the development supportable, subject to securing the necessary items through condition and s.106 agreement.

9.124 Officers have carefully considered the likely transport and access impacts specific to a mixed shared living and residential scheme of this size, with public uses on the ground floors. For example, a high demand for deliveries and servicing in and around the building from vehicles, visitor cyclists and pedestrians as a result of a high number of residents. The applicant's draft servicing plan anticipates that approximately 83% of two way servicing trips a day for the total residential accommodation would be attributed to the shared living element of the development (78 out of 94 two-way trips). Given that there are limited comparative UK examples of shared living on this scale, it is considered necessary to require a bond to be secured against the projected delivery and servicing movements anticipated by the applicant. This will be monitored by the Council for a year, and can be reimbursed following expiry of this period if the projections are in line with what was envisaged. This is to ensure no adverse impacts on the local highways network from movements resulting from the shared living use, particularly given the cumulative number of developments and existing uses accessing from the surrounding road network and rear road into Harrington Court. This is to be secured within the s.106 agreement.

Construction Logistics

9.125 Given the scale of the development, a condition requiring the submission of a detailed Construction Logistics Plan is imposed to ensure that the construction phase of development does not result in undue impacts upon the surrounding highway network. This is of particular importance given that there are a number of developments consented or proposed surrounding the site, and site logistics and build programmes will therefore need to be co-operative between developers to manage the potential for multiple schemes to be delivered simultaneously. The Construction Logistics Plan must carefully consider loading and servicing during the construction phase (including

demolition) where the site lies on a busy route surrounded by main roads and residential properties on all sides. This will be reviewed carefully by officers at condition stage to ensure minimal disruption to the road network and surrounding residents. The Plan should also cover specific hours of deliveries, proposed security arrangements for the site, details of precautions for mud and substances on the highway and details of all Non-Road Mobile Machinery which will be used during all phases of construction.

Refuse collection and storage

- 9.126 The proposal includes bin storage at both ground and basement level in both buildings, with collection to take place via the path to the rear of the building from the loading bay on Altyre Road. Given the distance from the loading bay to the refuse stores would exceed 20m, it was originally proposed for site management teams to move bins to a presentation area closer to the loading bay on the rear path. Officers raised concerns with this proposal, given the amount of bins likely to be held in this area at one time and conflict with access to the cycle store and potential disruption to the adjacent café and highway. Given the constraints of the site and combination of uses, alternative options and increased capacity are limited. It is therefore now proposed for refuse collection to be dealt with privately for all elements of the development, so collection teams can take bins straight from the relevant stores to the loading bay without requiring a collection point. Furthermore, this will allow more frequent collections than the Council offers to off-set any concerns over capacity of the refuse storage areas. The applicant has committed to ensuring that any additional costs arising from this service would be subsidised by the shared living accommodation to ensure no additional burden placed onto occupiers of the affordable units, which is to be secured within the s.106 agreement. This is considered acceptable on balance.
- 9.127 It is expected that full details of the proposed collection arrangements, including agreement on the operator who will be carrying it out, will be specified at condition stage in a detailed refuse management strategy. This strategy must also detail of how refuse collection will be managed within the building by the operator and residents (i.e. for residents with accessibility issues), how movement of bins along the pathway will be managed successfully to avoid disruption and the number of collections required per week to ensure this is reasonable. This will also feed into the shared living management plan and tenancy guide to be given to residents on arrival, which will also be assessed prior to occupation.

Sustainable transport

- 9.128 Given that the development would be car-free (aside from disabled spaces) and taking into account the nature of the development, increased walking, cycling and public transport use is expected. To mitigate against this and improve connections for all transport measures, improvements to the highways network immediately surrounding the site in line with the Council's future vision for the area surrounding East Croydon station are to be secured as part of the s.106 agreement and S.278 works. This includes a cycle lane immediately to the north of the site on Addiscombe Road, removal of pedestrian underpass and ramps on the corner with Altyre Road (subject to formal approval through the process under s.247 of the TCPA), provision of a loading bay on Altyre Road and proposed raised table top crossing to the west of the site.
- 9.129 The applicants have proposed upgrades to the local highways network as part of their Active Travel Zone assessment to support the forthcoming development, including planting along Park Lane between pedestrians and the carriageway, footway improvements for wheelchair users linking the A232 and The Avenue and planting

surrounding the infilled subway. A financial contribution (minimum of £50,000) towards implementation of these measures is to be secured through the s.106 agreement.

Travel Plan

- 9.130 In order to ensure that the identified modal shift is adequately supported, and barriers to uptake of more sustainable transport modes can be addressed, a Travel Plan and monitoring for three years along with a financial contribution of £1,969 to allow this is to be secured through the s.106 agreement.

Environmental impact and sustainability

Flooding and drainage

- 9.131 The site is within Flood Zone 1 (low risk) and an area of surface water flood risk. There is limited potential for groundwater flooding to occur. The applicant has provided a Flood Risk Assessment and Drainage Strategy. It is proposed to attenuate surface water using a combination of blue roofs at both roof levels and a below ground attenuation tank located at the rear of the building in front of the car parking spaces. Soft landscaping and surface water shed from adjacent footpaths are proposed to diffusely infiltrate to ground. At ground level, use of SUDs features such as Green/Blue Arborcells, filter strips and maximising infiltration potential of soft landscaping are to be explored in more detail post-determination (this is to be secured by condition).

- 9.132 The Lead Local Flood Authority assessed the proposed scheme and following submission of additional information raise no objection.

- 9.133 With regards to foul water and surface water network infrastructure capacity, Thames Water raised no objection. Informatives are recommended, including to advise the developer that Thames Water underground water assets are located within 15m of the development, and water mains crossing or close to the development. Thames Water have requested a condition be imposed, requiring the developer to liaise with them to discuss the impact on the existing water network infrastructure, and whether upgrades are required to accommodate the development. A further condition was requested to secure submission of a piling method statement, given the development is located within 15 metres of a strategic sewer. This is included within the recommendation.

Contamination

- 9.134 The submitted preliminary risk assessment report for contaminated land concluded that no significant issues of environmental concern were identified. The site was historically used as open land followed by residential housing. The site was then redeveloped into commercial use by 1986. Whilst the railway is located within 50m of the site, the impact is likely to be minimal based on the distance of the site and extensive hardstanding would mitigate any risks to site users. The submitted report is considered to be sufficient, and there is no requirement for contamination investigation remediation. Conditions are however recommended to ensure the development is carried out in accordance with the submitted report, and to ensure the applicants keep a watching brief during works and notify the Council should any unexpected contamination be encountered during the demolition.

Air quality

- 9.135 The entire borough of Croydon is an Air Quality Management Area (AQMA) and therefore careful consideration to the air quality impacts of proposed development is required. The submitted air quality assessment demonstrates that the development will be Air Quality Neutral. It identifies that mitigation measures to minimise dust emissions

and particulate matter during construction works will be required, to ensure that any impacts of the construction phase will not be significant. Emissions from traffic generated from the development would require mitigation for the majority of residential properties on the first, second and third floors (on north and eastern side of development as identified in the report), in the form of the installation of mechanical ventilation with in-built infiltration. Emissions from the proposed boiler operations on the local area is determined to be negligible and within guidelines. A contribution of £12,928 towards air quality improvements to mitigate against these impacts will be secured via the s.106 agreement, with recommended conditions. This would bring the development in line with policy SI1 of the London Plan.

Construction Impacts

- 9.136 A Construction Environmental Management Plan is to be secured by a condition, to ensure adequate control of noise, dust and pollution from construction and demolition activities, and to minimise highway impacts during the construction phase.

Ventilation of commercial units

- 9.137 Prior to use of any food and drink uses (including the kitchen and dining areas within the shared living accommodation) commencing on site, details of ventilation will be required by planning condition.

Light pollution

- 9.138 To avoid excessive light pollution, a condition is recommended requiring details of external lighting, including details of how it would minimise light pollution.

Sustainable design

Carbon emissions

- 9.139 Policy SP6.3 requires new development to minimise carbon dioxide emissions and seeks high standards of design and construction in terms of sustainability in accordance with local and national carbon dioxide reduction targets. This requires new build, non-residential development of 1000sqm and above to achieve a minimum of 35% CO₂ reduction beyond the Building Regulations Part L (2013), and new build residential development over 10 units to achieve the London Plan requirements or National Technical Standards (2015) for energy performance (whichever is higher). In line with the London Plan (2021), new dwellings in major development should be Zero Carbon with a minimum on-site reduction of at least 35% beyond Building Regulations Part L (2013), with any shortfall to be offset through a financial contribution.
- 9.140 Policy also requires the development to incorporate a site wide communal heating system and to be enabled for district energy connection.
- 9.141 On the basis that the shared living accommodation is sui-generis and the units are not self-contained, Tower Building A has been assessed against the non-domestic non-residential targets for carbon emissions. Officers consider this to be a reasonable assumption, with the traditional residential accommodation within Shoulder Building B assessed against the standard domestic methodology.
- 9.142 Overall, across the whole development, a reduction in regulated CO₂ emissions of 46% over current Part L Building Regulations (2013) is expected to be achieved. The remaining regulated CO₂ emissions shortfall would be covered by a carbon offset payment (£592,800) which would be secured through the s.106 agreement.

- 9.143 Whilst no existing district heating networks currently exist, the site is within an area where one is planned. The development has been provided with a reasonable space allowance in order to facilitate the future connection (for both domestic and non-domestic accommodation) to a proposed heat network, should one come forward. Space has been allocated for future district heating plate exchangers in the boiler plant. A s.106 obligation is also recommended requiring connection to the District Heating System if the Council has appointed an operator before commencement on site, or a feasibility into connection to a future system on first replacement of the heating plant. On this basis, as the proposal complies with the above requirements regarding carbon reduction and a CO2 offset payment, subject to a condition requiring the above standards to be achieved, the proposal is considered acceptable.
- 9.144 Both blocks can achieve the on-site carbon dioxide reductions as required by policy. Sustainable design and construction measures have been designed in where feasible, including measures to address overheating within the units. These matters are to be secured by condition.
- 9.145 A whole-life cycle carbon assessment and circular economy statement has been provided to capture the developments carbon impact, demonstrating how waste will be minimised and which actions will be taken to reduce life-cycle carbon emissions. This meets the requirements of Policy SI 2 and SI 7 of the London Plan (2021).

Water use

- 9.146 Policy SP6.3 requires all new build residential development to meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G. A planning condition is recommended to secure compliance with this target to ensure sustainable use of resources in the shoulder block containing the C3 accommodation. There is no policy requirement relating to water efficiency standards in non-domestic buildings such as for the co-living tower.

Other planning issues

- 9.147 A health impact assessment was submitted. This anticipates the impact on health associated with the proposed development would be positive overall. This includes provision of new high quality homes across a range of sizes and tenures, encouraging active lifestyles, improving connectivity to the public realm and local services and opportunities for more natural surveillance and active uses at ground level to improve sense of safety. Planning obligations and conditions are recommended to secure measures to avoid any potential for unacceptable health impacts, for example implementation of appropriate air quality mitigation measures for during construction. The development is liable for a Community Infrastructure Levy (CIL) payment to ensure that development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities.
- 9.148 An EIA Screening Opinion (20/03128/ENV) was issued prior to the submission of the planning application. The development was not considered to require an EIA, taking account of its location, nature, scale and characteristics.
- 9.149 A TV and Radio signal impact assessment was submitted, which identified the potential for very localised disruption to the reception of digital satellite television services to the immediate northwest of the site within 193m from the base of the

building (around east George Street and Billinton Hill). This could be mitigated by repositioned satellite dishes, to be secured by the s.106 agreement.

9.150 In order to ensure that the benefits of the proposed development (including those required to mitigate the harm caused) reach local residents who may be impacted indirectly or directly by the proposal's impacts, a skills, training and employment strategy (both operational and construction phases) and a contribution towards training are to be secured through the s106 agreement.

9.151 London Plan policy D9 states that tall buildings, including their construction, should not interfere with aviation, navigation or telecommunication. NATS Safeguarding (who are responsible for the management of en route air traffic) have confirmed that there would be no conflict with their safeguarding criteria, with no objections raised to the development as a result. Accordingly no conditions or mitigation would be required.

Conclusions

9.152 The proposed development would introduce a significant amount of new housing, including a mix of uses with shared living accommodation, affordable residential units and active ground floor commercial uses. The office retention policy does not cover this location and the education re-provision (albeit smaller), application submission for FSB relocation and flexible permission in place renders the loss supportable. The proposed development would be well designed and deliver improvements to the public realm, making use of an existing underutilised site. There would be a good standard of accommodation for new residents, with an acceptable level of impact on neighbours. There would be neutral harm to designated heritage assets and some low level harm to the setting of the NLA Tower as a Locally Listed Building, but that harm is considered acceptable given the benefits being delivered by the scheme. Valued trees are being retained which contribute positively to amenity. With conditions and mitigation, the proposal would be sustainable and acceptable in terms of its impact on the highway network. Residual planning impacts would be adequately mitigated by the recommended s.106 obligations and planning conditions.

9.153 All other relevant policies and considerations, including equalities, have been taken into account. It is recommended that planning permission is granted in line with the officer recommendation for the reasons summarised in this report.

Appendix 1: Drawing numbers

Drawings:

19066-SQP-ZZ-00-DR-A-PL100 A, 19066-SQP-ZZ-00-DR-A-PL101 G, 19066-SQP-ZZ-00-DR-A-PL103 F, 19066-SQP-ZZ-00-DR-A-PL115 A, 19066-SQP-ZZ-07-DR-A-PL105 D, 19066-SQP-ZZ-08-DR-A-PL106 D, 19066-SQP-ZZ-10-DR-A-PL107 D, 19066-SQP-ZZ-12-DR-A-PL108 C, 19066-SQP-ZZ-13-DR-A-PL109 D, 19066-SQP-ZZ-18-DR-A-PL110 D, 19066-SQP-ZZ-26-DR-A-PL111 C, 19066-SQP-ZZ-B1-DR-A-PL102 C, 19066-SQP-ZZ-M0-DR-A-PL104 D, 19066-SQP-ZZ-RF-DR-A-PL112 C, 19066-SQP-ZZ-RF-DR-A-PL114 B, 19066-SQP-ZZ-XX-DR-A-PL201 E, 19066-SQP-ZZ-XX-DR-A-PL202 E, 19066-SQP-ZZ-XX-DR-A-PL204 C, 19066-SQP-ZZ-XX-DR-A-PL205 C, 19066-SQP-ZZ-XX-DR-A-PL206 D, 19066-SQP-ZZ-XX-DR-A-PL207 D, 19066-SQP-ZZ-XX-DR-A-PL301 A

Supporting Documents:

19066-210526-FifthStateCroydon-DesignAndAccessStatement -
19066-210929-FifthStateCroydon-DesignAndAccessStatment-Addendum-D
Financial Viability Appraisal (DS2, May 2021)
Financial Viability Appraisal GLA Response October 2021 (DS2)
Energy Statement Revision 02 55202 May 2021 (Chapmans)
Whole Life Cycle Carbon Assessment (Chapmans)
Sustainability Statement Revision 01 55202 May 2021 (Chapmans)
Flues and Ventilation Report Revision 02 55202 May 2021 (Chapmans)
Utilities Assessment Revision 01 55202 May 2021 (Chapmans)
Phase 1 Ecology Assessment May 2021 (LUC)
Housing Contribution, Need & Demand Study and Economic Impact Assessment May 2021 (Volterra)
Fifth State Croydon Management Plan (CRM)
Fire Statement Revision May (2021 55202-CBD-00-ZZ-RP-F-5700) (Chapmans)
Fire Statement Addendum Report Revision 04 December (2021 55202-CBD-00-ZZ-RP-F-5701) (Chapmans)
Noise Assessment Report 26975/NAR April 2021 (Hann Tucker Associates)
Sustainable Urban Drainage Statement EXP-1275-REP-C-001 November 2021 (Expedition)
Statement of Community Involvement May 2021 (Quatro)
Townscape, Heritage and Visual Impact Assessment May 2021 (The Heritage Practice/Cityscape)
Air Quality Assessment 784-A115779 May 2021 (Tetra Tech)
Transport Assessment PB9824-RHD-ZZ-XX-RP-R-0002 May 2021 as amended (RHDHV)
Travel Plan PB9824-RHD-ZZ-XX-RP-R-0002 April 2021 (RHDHV)
Waste, Delivery and Servicing Plan PB9824-RHD-ZZ-XX-RP-R-0003 April 2021 (RHDHV)
Outline Demolition and Construction Method Statement DXXXX-MS-001 REV B Feb 2021 (O'Keefe)
Outline Construction Logistics Plan PB9824-RHD-ZZ-XX-RP-R-0004 May 2014 (RHDHV)
Landscape and Public Realm Strategy 8321-DRP-001 May 2021 as amended (Space Hub)
Archaeological Desk-based Assessment May 2021 (LUC)
Environmental Preliminary Risk Assessment June 2021 (Paragon)
Preliminary Flood Risk Assessment April 2021 (LBHGEO)
Pedestrian Wind Environment Study WE940-06F02(REV2)- WE REPORT May 2021 (Windtech)
Daylight, Sunlight and Overshadowing Assessment 784-A115779 May 2021 as amended (Tetra Tech)

Health Impact Assessment May 2021 (Iceni)
Planning Statement May 2021 (DP9)
Television and Radio Reception Impact Assessment April 2021 (GTech)
Arboricultural Impact Assessment April 2021 (SJ Stephens Associates)
Circular Economy Statement R00 55202 October 2021 (Chapmans)

Appendix 2: 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” (DD) 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.

Daylight to new buildings: Average Daylight Factor (ADF)

The ADF test calculates the average illuminance within a room as a proportion of the illuminance available to an unobstructed point outdoors, under a sky of known illuminance and luminance distribution.

The BRE Guidelines stipulate that kitchens should attain at least 2% ADF, living and dining rooms at least 1.5% ADF and bedrooms at least 1% ADF.

Sunlight to gardens and outdoor spaces

The BRE guidelines look at the proportion of an amenity area that received at least 2 hours of sun on 21st March. For amenity to be considered well sunlight through the year, it stipulates that at least 50% of the space should enjoy these 2 hours of direct sunlight on 21st March.