

PART 5: Development Presentations

1 INTRODUCTION

- 1.1 This part of the agenda is for the committee to receive presentations on proposed developments, including when they are at the pre-application stage.
- 1.2 Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
- 1.3 The following information and advice applies to all those reports.

2 ADVICE TO MEMBERS

- 2.1 These proposed developments are being reported to committee to enable members of the committee to view them at an early stage and to comment upon them. They do not constitute applications for planning permission at this stage and any comments made are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
- 2.2 Members will need to pay careful attention to the probity rules around predisposition, predetermination and bias (set out in the Planning Code of Good Practice Part 5.G of the Council's Constitution). Failure to do so may mean that the Councillor will need to withdraw from the meeting for any subsequent application when it is considered.

3 FURTHER INFORMATION

- 3.1 Members are informed that any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in an Addendum Update Report.

4 PUBLIC SPEAKING

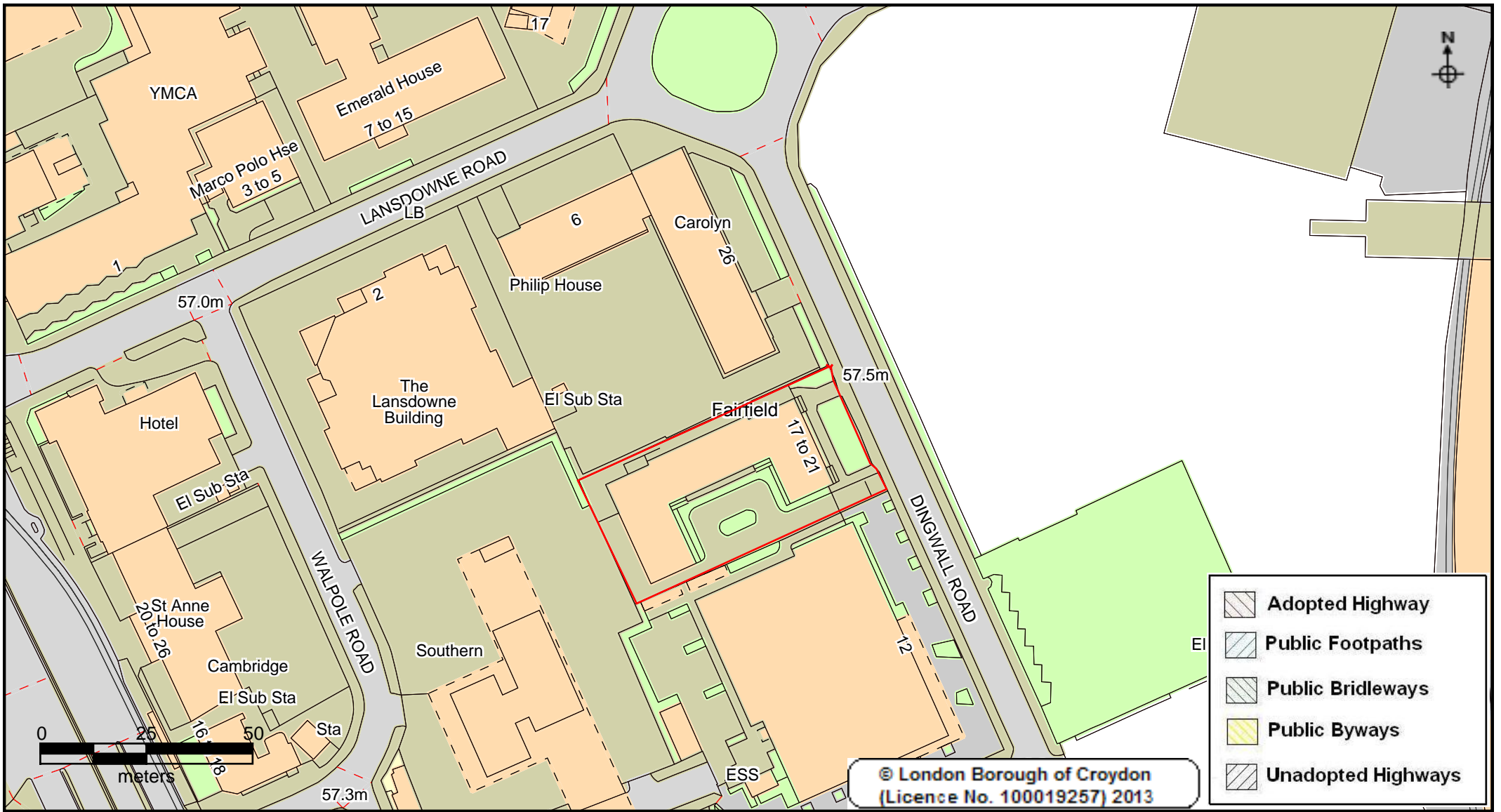
- 4.1 The Council's constitution only provides for public speaking rights for those applications being reported to Committee in the "Planning Applications for Decision" part of the agenda. Therefore reports on this part of the agenda do not attract public speaking rights.

5 BACKGROUND DOCUMENTS

- 5.1 For further information about the background papers used in the drafting of the reports in part 8 contact Mr P Mills (020 8760 5419).

6 RECOMMENDATION

- 6.1 The Committee is not required to make any decisions with respect to the reports on this part of the agenda. The attached reports are presented as background information.



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PART 5: Development Presentations

Item 5.1

1. DETAILS OF THE DEVELOPMENT

Ref: 17/02952/PRE
 Location: 17-21 Dingwall Road, Croydon, CR0 2NA
 Ward: Fairfield
 Description: Residential-led redevelopment of site to provide approximately 172 units in two blocks ranging in height from 9 to 24 storeys above ground level, with commercial use at ground, first and second floor levels fronting onto Dingwall Road.
 Drawing Nos: Presentation to Committee (October 2017)
 Applicant: London Wall Outsourcing Investments Limited
 Agent: Broadway Malyan
 Case Officer: Michael Cassidy

	1 bed	2 bed	3 bed	4 bed
FLATS	72	75	25	0

Number of car parking spaces	Number of cycle parking spaces
9 (all disabled spaces)	278

2. BACKGROUND

2.1 This proposed development is being reported to Planning Committee to enable members of the committee to view it at an early stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.

2.2 This is the first presentation to the Planning Committee.

3. PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The proposal is for the construction of a residential led development comprising two interlinked buildings of 9 and 24 storeys providing 172 flats. The applicant proposes to provide an open market housing led scheme with an element of affordable housing. The applicant's current offer in terms of affordable housing is that 15% of the units (26 units in total) would be provided as Shared Ownership units. The flats are all to be designed in line with the internal floorspace standards referenced within Policy 3.5 of the London Plan.

3.2 Commercial units are proposed at ground, first and second floor levels accessed from Dingwall Road. All of the residential units above and to the rear of these commercial units would have private external amenity space in the

form of balconies and/or roof terrace areas and all residents would have shared use of communal amenity space areas located at first floor level between the two blocks and roof garden areas on top of each building.

- 3.3 The proposals also include a loading bay for servicing/refuse collection and 9 disabled parking spaces centrally located on the site at ground floor level within a single storey element joining the two buildings below the proposed central garden area. Cycle storage for approximately 272 long stay and 6 short stay is proposed at basement and ground floor to be designed to meet London Plan standards. The proposals also include improvements to the public realm, in the form of tree planting, to the front of the site.

Site and Surroundings

- 3.4 The site is located on the western side of Dingwall Road within easy walking distance of East Croydon Station. It comprises a two-storey detached 'C-shaped' building currently used as a job centre (Class A2 use). There is a gated vehicular access off Dingwall Road to the south of the building leading to an area of hardstanding that is used for parking.
- 3.5 Carolyn House, a 16 storey former office building currently being extended to 22-storeys in height and converted to predominantly residential use with commercial uses on the ground and first floors, lies to the north of the site.
- 3.6 To the east is Ruskin Square, a development site within the East Croydon Masterplan Area, where a development comprising 11 buildings with a mix of residential, retail (Classes A1-A5) and community uses is currently under construction. To the south lies Renaissance House, a recently built 8-storey office building and to the west of the site is Southern House, an 18-storey office building.
- 3.7 The surrounding area is characterised by a mix of residential and commercial uses with a wide ranging degree of heights and appearances. Corinthian House, a locally listed building, is located to the north of the site beyond Carolyn House.
- 3.8 The following designations apply to the site:
- Croydon Opportunity Area
 - Croydon Metropolitan Centre
 - New Town and East Croydon Character Area
 - Area of High Density

Planning History

- 3.9 There is no planning history directly relevant to the site, however, the following planning decisions on neighbouring sites are relevant to the application:

Carolyn House, 26 Dingwall Road (to the north of the site)

- 16/02458/P – Erection of a 4 and 6 storey rooftop extension (38 apartments), change of use of Floors 2 and 8 from office to residential use (20 apartments) along with a part change of use of ground floor to form two cafe/restaurant (Class A3) units, a part first floor communal co-working space, ground floor front extension and 2 storey rear extension, alterations to elevations, along with public realm improvements, associated parking and ground floor A3 use and residential entrance lobby.

Planning permission granted subject to conditions and S106 legal agreement on 24/04/2017.

Ruskin Square (to the east of the site)

- 11/00631/P: The erection of five buildings with a minimum floor area of 53,880sq metres and maximum of 62,080sq metres to provide a minimum of 550 and a maximum of 625 residential units; erection of 6 buildings for class B1 use for a minimum of 88,855sq metres and a maximum of 151,420sq metres; provision of a minimum of 7,285sq metres and a maximum of 10,900sq metres of retail (class A1-A5 floorspace); provision of a maximum of 400sq metres of community use (class D1); provision of a replacement theatre of 200 seats; provision of energy centre and estate management facilities; formation of vehicular accesses and provision of pedestrian routes public open space and car parking not to exceed 256 parking spaces.

Planning permission was granted subject to a S106 legal agreement. Reserved matters for several phases (one residential phase and two commercial phases) have been approved and the first residential and commercial phases have been completed or are nearing completion.

4. RELEVANT PLANNING POLICIES AND GUIDANCE

- 4.1 Planning applications should be determined in accordance with the Development Plan unless material consideration dictate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP).
- 4.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:
 - Promoting sustainable transport;
 - Delivering a wide choice of high quality homes;
 - Requiring good design.

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

London Plan 2017

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.7 Large residential developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.12 Negotiating affordable housing
- 3.13 Affordable Housing thresholds
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.5 Decentralised Energy Networks
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 5.21 Contaminated land
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Tall and large buildings
- 7.8 Heritage assets
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise
- 7.21 Trees and Woodland
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable Development

- SP2.1 Homes
- SP2.2 Quantities and Locations
- SP2.3 Affordable Homes - Tenure
- SP2.4 Affordable Homes - Quantum
- SP2.5 Mix of homes by size
- SP2.6 Quality and Standard
- SP3.1 Employment
- SP3.2 Innovation, Investment & Enterprise
- SP4.1-4.3 Urban Design and Local Character
- SP4.5-4.6 Tall buildings
- SP4.7-4.10 Public Realm
- SP4.13 Character, Conservation and Heritage
- SP6.1 Environment and Climate Change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable Design and Construction
- SP7.4 Enhance biodiversity
- SP8.3-8.4 Development and Accessibility
- SP8.6 Sustainable Travel Choice
- SP8.7(h) Cycle Parking
- SP8.13 Motor Vehicle Transportation
- SP8.15-16 Parking

Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD1 High Quality and Sustainable Design
- UD2 Layout and siting of new development
- UD3 Scale and Design of new buildings
- UD6 Safety and Security and New Development
- UD7 New Development and Access for All
- UD8 Protecting residential amenity
- UD13 Parking Design and Layout
- UD14 Landscaping
- UD15 Refuse and Recycling Storage
- EP1 – EP3 Pollution
- EP5 - EP7 Water – Flooding, Drainage and Conservation
- T2 Traffic Generation from Development
- T4 Cycling
- T8 Parking
- H2 Supply of new housing
- H3 Housing Sites
- H4 Dwelling mix on large sites

There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG, March 2016
- Homes for Londoners: Affordable Housing and Viability SPG, August 2017
- National Technical Housing Standards, 2015

- National Planning Practice Guidance, 2014
- Play and Informal Recreation SPG
- Accessible London: Achieving an Inclusive Environment SPG
- Sustainable Design and Construction SPG
- Croydon Public Realm Design Guide, 2012
- Croydon Opportunity Area Planning Framework (adopted by the Mayor and Croydon), 2013
- SPG Note 3 – Designing for Community Safety
- SPG Note 10 – Designing for Accessibility
- SPG Note 12 – Landscape Design
- SPG Note 15 – Renewable Energy
- SPG Note 17 – Sustainable Surface Water Drainage
- SPG Note 18 – Sustainable Water Usage

Emerging Policies CLP1.1

- SP2.2- Quantities and locations
- SP2.3-2.6- Affordable Homes
- SP2.8- Quality and standards
- SP3.13- Office floor space in the Croydon Metropolitan Centre
- SP3.14- Employment and training
- SP4.13- Character, conservation and heritage
- SP6.3- Sustainable design and construction
- SP6.4- Flooding, urban blue corridors and water management
- SP8.9- Sustainable travel choice

Emerging Policies CLP2

- DM1- Housing choice for sustainable communities
- DM5- Development in Croydon Metropolitan Centre
- DM5.1- Vitality and viability
- DM5.3- Mixed use developments
- DM9- Development in edge of centre and out of centre locations
- DM11- Design and character
- DM11.1- Quality and character
- DM11.2- Quality of public and private spaces
- DM11.4- Residential amenity space
- DM11.5- Communal residential amenity space
- DM11.6- Protecting residential amenity
- DM11.7- Design quality
- DM11.9- Landscaping
- DM11.10- Architectural lighting
- DM12- Shopfront design and security
- DM14- Refuse and recycling
- DM16- Tall and large buildings
- DM17.1- Promoting healthy communities
- DM19.1- Character, appearance and setting of heritage assets
- DM19.9- Archaeology

- DM24- Development and construction
- DM25- Land contamination
- DM26.2- Flood resilience
- DM26.3- Sustainable drainage systems
- DM28- Biodiversity
- DM29- Trees
- DM30- Promoting sustainable travel and reducing congestion
- DM31- Car and cycle parking in new development
- DM33- Facilitating rail and tram improvements
- DM40- Croydon Opportunity Area
- DM40- Site allocations (Site 186: Job Centre, 17-21 Dingwall Road)

4.4 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) was approved by Full Council on 5th December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3rd February 2017. The examination in public took place between 16th May and 31st May 2017. Main modifications have been received from the Planning Inspector and the Council are consulting on these modification during the period 29th August – 10th October 2017.

4.5 According to paragraph 216 of the NPPF, relevant policies in emerging plans may be accorded weight following publication, but with the weight to be given to them is dependent on, among other matters, their stage of preparation. Now that the main modifications to CLP1.1 and CLP2 have been published for consultation, there are certain policies contained within these plans that are not subject to any modifications and significant weight may be afforded to them on the basis that they will be unchanged when CLP1.1 and CLP2 are adopted.

5. MATERIAL PLANNING CONSIDERATIONS

5.1 The main planning issues raised by the development that the Committee should be aware of are:

1. Principle of the proposed development
2. Acceptability of proposed housing typology
3. Townscape and design
4. The impact on adjacent occupiers
5. The acceptability of the living conditions provided for future occupiers
6. The impact on highway and parking conditions in the locality
7. Wider pedestrian connectivity and public realm improvements
8. The environmental impact and sustainability of the development
9. Other planning matters

Principle of the proposed development

5.2 The site is located within the Croydon Opportunity Area, Croydon Metropolitan Town Centre and New Town and East Croydon Character Area, where residential development is supported. The site contains a two-storey building

currently used as a job centre (Class A2 use). The site is not allocated under adopted policy, but is identified as falling within an 'Area of High Residential Density' under the Saved Policies of the UDP.

- 5.3 The emerging Croydon Local Plan (Detailed Policies and Proposals (Proposed Submission) identifies the site as 'Site 186: Job Centre, 17-21 Dingwall Road' (Appendix 5 – Schedule of proposal sites). The emerging allocation for the site is 'Offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if required by the NHS)'. The supporting text to the draft allocation advises:

'The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area making it particularly suited to office use. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. Acoustic measures will need to be incorporated in the design to assist sustainability of the development.'

- 5.4 As the existing job centre is a Class A2 use, there is no policy requirement for re-provision of office space. The inclusion of healthcare facilities as part of the proposals will, however, need to be explored given the site is identified by the NHS as being in an area with a need for additional healthcare facilities.
- 5.5 The use of the site for mixed commercial and residential purposes is considered to be acceptable and in line with the objectives for the 'New Town' area outlined in the Opportunity Area Planning Framework (OAPF). No objection is raised in principle to the development.

Acceptability of Proposed Housing Typology

Housing Mix

- 5.6 The Council seeks to secure the provision of family housing and has an aspiration for 20% of all new homes identified in the Croydon Opportunity Area (COA) to have three or more bedrooms. This site is located within the 'New Town' area where a minimum of 10% is sought.
- 5.7 14% of units (25 in total) would be provided with three bedrooms. This is in accordance with the 10% policy target set out in the OAPF and will weigh positively for the scheme in the balance of considerations relevant to its determination at the planning application stage.
- 5.8 Given the anticipated forthcoming changes to policy in terms of affordable housing upon the adoption of CLP1.1, a brief comparison table of current and emerging policies within this area is useful and is provided as follows:

Current Policy Affordable housing	Post-adoption Local Plan Policy Affordable housing
<p data-bbox="357 342 735 414">Affordable: (CLP1 Policies SP2.3 and SP2.4)</p> <p data-bbox="357 490 762 779">50% on-site subject to viability (60:40 split between affordable rent and intermediate products unless we have agreement from a Registered Provider that this split is not practical in this location).</p> <p data-bbox="357 819 762 1294">Any provision less than 50% must be justified by a viability report which will be independently assessed at the cost of the applicant. There is a minimum requirement of 10% on site with the remainder up to 50% being provided either on a donor site, via a commuted sum, or through a review mechanism (in that order of preference).</p>	<p data-bbox="869 342 1273 450">Affordable: (CLP1.1 Policies SP2.4 and SP2.5)</p> <p data-bbox="869 490 1331 707">50% on-site subject to viability (60:40 split between affordable rent and intermediate products unless we have agreement from that this split is not practical in this location).</p> <p data-bbox="869 819 1321 1108">Any provision less than 50% must be justified by a viability report which will be independently assessed at the cost of the applicant. There is a minimum requirement of affordable housing to be provided either as:</p> <p data-bbox="869 1149 1310 1256">30% affordable housing on the same site as the proposed development; or</p> <p data-bbox="869 1296 1335 1805">15% affordable housing on the same site as the proposed development if the site is in the Croydon Opportunity Area, plus the equivalent of 15% affordable housing on a donor site provided 30% on-site provision is not viable and the donor site is located within either the Croydon Opportunity Area or one of the neighbouring Places of Addiscombe, Broad Green & Selhurst, South Croydon or Waddon; or</p> <p data-bbox="869 1845 1315 2022">15% affordable housing on the same site as the proposed development plus a Review Mechanism entered into for the remaining affordable housing</p>

	<p>(up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on-site provision is not viable, construction costs are not in the upper quartile¹ and there is no suitable donor site.</p> <p>Less than 15% - application will be refused.</p>
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1. Upper quartile construction costs will be compared against comparable development types in London (for example, a tall tower would be compared against other tall towers no matter what the height; and a high density urban block of flats would be compared against other high density urban block of flats). Abnormal costs can be excluded. In the case of this scheme costs associated with the construction of the bridge across the railway and any loss of units caused by having to accommodate future redevelopment of East Croydon station would be considered to be abnormal costs.

5.9 Policy SP2.4 of CLP1 seeks up to 50% affordable housing provision on sites such as this. Table 4.1 referred to in the policy provides flexibility, requiring a minimum level of affordable housing on all sites. Following the end of the first three years of the plan, the minimum level was reviewed (from its previous minimum requirement of 15%) and this is currently set at 50%.

5.10 In the COA, a minimum of 10% affordable housing will need to be provided on-site with the remainder being provided on-site, off-site or through a commuted sum. The affordable housing should be provided at a ratio of 60:40 between affordable rented homes and intermediate lost cost shared ownership homes. This policy is being reviewed through the partial review of CLP1 (CLP1.1). The Local Plan Inspector has introduced main modifications to the policy, which do not alter the approach of the policy but does mean that only moderate weight can be afforded to the emerging policy landscape.

5.11 Emerging policy SP2.4 of CLP1.1 prefers a minimum on-site provision of 30% affordable housing, but also provides options for 15% on-site/15% on a donor site (located in the COA, Addiscombe, Broad Green, Selhurst, South Croydon or Waddon), or a minimum of 15% onsite plus a review mechanism for the remaining affordable housing (provided that 30% affordable housing is not viable, construction costs are not in the upper quartile as defined above and there is no suitable donor site).

5.12 Emerging policy retains the 60:40 ratio but expands the types of intermediate products to include starter homes and intermediate rent products as well as low costs shared ownership homes. The proposal will need to be designed in line with the Mayor's recently adopted Homes for Londoners: Affordable Housing and Viability SPG.

- 5.13 The applicants have advised that based on their initial viability assessment (this has not as yet been shared with Officers) the maximum affordable housing the scheme can provide is 15% of the proposed units (26 units) as shared ownership. Their intention is to locate these units in the smaller rear block (Block B), with the remainder of the units (10 units) being provided for private sale. The exact location and mix of units is, however, yet to be finalised within the proposal.
- 5.14 Once finalised, a viability report will need to be provided to justify the affordable housing level being offered in accordance with the objectives set out in the London Plan, emerging London Plan Housing SPG, CLP1, Croydon OAPF, UDP Saved Policies 2013 and national policies. This will need to be independently assessed to determine firstly whether the provision of the CLP1 target of 50% affordable housing is achievable and if it is not, whether a minimum of 30% on-site provision as set out in the preferred approach in CLP1.1 is achievable. An independent Quantity Surveyor will also need to be instructed to undertake a detailed further review of the build costs proposed in the viability assessment, as a 'double check' to make sure they are reasonable, given the structural costs associated with tall buildings.
- 5.15 Once the viability report has been independently reviewed to confirm the maximum reasonable viable level of affordable housing the scheme can support and remain viable, Officers intend to report this pre-application submission back to the Planning Committee on 2nd November 2017 so that the Committee may comment. The limited affordable housing offer is considered to weigh against the scheme in terms of the planning balance.

Townscape and Design

- 5.16 The overall height and massing of the proposal is considered to be acceptable and the townscape impacts of the proposal have been assessed through view studies, which also take into account the cumulative impacts of the proposed scheme when viewed against existing neighbouring buildings and other surrounding emerging schemes (in particular the Carolyn House scheme to the north and Ruskin Square scheme to the east).
- 5.17 At this point in the pre-application, the design discussions are on-going. The detailed design, however, is progressing well although further discussions with officers are needed.
- 5.18 At present, the outstanding concerns with the scheme from the Council's perspective pertain to the architectural expression of both blocks and the activating of their frontages both at present and in view of future surrounding developments. These concerns are as follows:

Massing

- 5.19 The site falls within the central area of the tall building zones set out in Chapter 6 of the OAPF, and so it is acceptable for a tall building form to be located on the site. In addition, the density and height of the emerging context means the

proposal's height is broadly acceptable. The applicant has tied the shoulder of the front block facing Dingwall Road (Block A) in with the heights of the future Ruskin Square development opposite, and its overall height ties in with Carolyn House, which steps up towards the site. These broad moves are supported.

- 5.20 An outstanding concern, however, remains in relation to the lack of variation in the mass in the direction perpendicular with Dingwall Road. There is little large scale variation in this direction, with the elevation reading all in one plane. At the finer scale there is variation through the balconies, structural frame and glazing envelope siting in different planes, however a larger move is still considered necessary. Potentially this could come by setting the shoulder element back from the full height mass, helping both to read as more slender in form.
- 5.21 The Southern House facing block (Block B) to the rear of the site is of a smaller scale which is seen as appropriate due to its interior block position and is also broadly supported. The carving of the mass to allow light into the first floor communal amenity space area is supported, however it is considered the form of this carved plane could be developed further so as not to read as such an abrupt cut into the mass.

Architectural expression and materiality

- 5.22 The prevailing language of the Dingwall Road facing block (Block A) is one of a strong vertical grid which has emerged out of a study of central Croydon's architectural character. While the work studying the context does provide a strong narrative, the visual character still appears overly corporate, with the GRC frame appearing exceedingly dominant. The expression and form of the balconies helps to add richness and a less corporate appearance, however there are still concerns that they are overly repetitive across the façade. The inset second floor commercial space seeks to provide a clear division between commercial below and residential above with some success and is supported.
- 5.23 The south-eastern elevation of the Dingwall Road Block (Block A) has had quite a large amount of material exploration, however there still remains concern that as a very prominent elevation facing East Croydon Station, it lacks enough articulation, and instead presents too blank a façade.
- 5.24 With regard to the Southern House facing block (Block B), the applicants have listened to Officers request that Block B's rear elevation facing Southern House be treated as its primary elevation, in preparation for the potential redevelopment of the neighbouring Southern House site. Overall the block's language is supported, however the internal elevation facing onto the courtyard currently appears overly blank and needing activation, something that needs addressing.
- 5.25 There is also still concern with how the entrance to the rear (western) block, disabled parking and service access is expressed. The large undercroft area threatens to leave a visual gap in the building frontages and the gate solution offered does not successfully resolve the matter. It also competes with the main

entrance visually and is very ambiguous as to its role in the streetscape. The alternative option of leaving the entrance open provides a clearer visual connection to the smaller residential block to Dingwall Road. However, there is an issue with this approach in that it may appear like a route through to Southern House (causing confusion for pedestrians).

Public Realm and Access

- 5.26 The applicant has been strongly encouraged to treat the internal access way to the Southern House facing block as a shared surface so that experientially those on foot have priority in the access way, and not vehicles.

The impact on adjacent occupiers

- 5.27 As the scheme progresses, detailed assessments will be needed in order to demonstrate that the proposal would not have any adverse impact on existing neighbouring uses (in particular the Premier Inn hotel to the north-west) and the future residents within Carolyn House and Ruskin Square which have been consented to the north and east. In addition, the impact of the proposals on the development potential of adjoining land (in particular the Southern House site) will also be a relevant consideration.

The acceptability of the living conditions provided for future occupiers

- 5.28 The Technical Housing Standards – Nationally Described Space Standard provides minimum floor area specifications for all new dwellings. The applicant is designing the scheme to meet all of these standards, and to provide 10% of units as wheelchair user accessible/easily adaptable in line with policy. This is supported.
- 5.29 A distance of approximately 18 metres would be provided between the front (Block 1) and rear (Block 2) blocks to undue overlooking or loss of privacy. The scheme is considered acceptable in terms of overlooking, light and outlook.
- 5.30 The London Housing Supplementary Planning Guidance (SPG) provides minimum standards which should be met with regards to amenity space. The scheme is to be designed to comply with the residential standards set out in the London Plan. All units would have balconies providing private amenity space areas and there would be access to a variety of indoor and outdoor shared amenity spaces for all residents, including communal rooms and terraces on the uppermost floors of both towers, and a first floor level garden area.
- 5.31 There are a high number of single aspect units within the scheme which causes concern. Within Block 1 there would be 52 single aspect unit and within Block 2 there would be 7. This equates to 34% of the total number of units. All of the single aspect units currently proposed are 1-bedroom 2 person units with none being directly north-facing and all having recessed private balconies. Officers are currently working with the applicants to reduce the overall number of single aspect units proposed.

The impact on highway and parking conditions in the locality

- 5.32 The site is located in an excellent location with the highest PTAL of 6b, being located in close proximity to the East Croydon transport Interchange and within the Croydon Metropolitan Town Centre. The proposed scheme would be car free except for 9 disabled parking spaces at ground floor level. This equates to a 5% provision of disabled car parking. The applicants are currently reconsidering the layout of the disabled car parking area to ensure it is functional and the maximum number of spaces can be accommodated. Electric vehicle charging points should also be provided in accordance with the standards set out in the London Plan.
- 5.33 278 cycle parking spaces (272 long stay and 6 short stay cycle parking spaces) are currently proposed within the footprint of the main building at ground and basement levels with a dedicated lift. As an alternative, there is the option to reposition the cycle storage in the basement to ground floor level along the northern boundary with Carolyn House whilst retaining an active frontage along this route. The cycle storage is to be designed in line with the London Plan standards.
- 5.34 A full application will need to be supported by a Transport Assessment with other documents including a Travel Plan, Delivery Service Plan, Waste Management Plan and Construction Logistics Plan being secured by condition.
- 5.35 It is not possible to comment further on highway related matters at this stage, however, there are no objections in principle to the proposed development subject to the issues raised above being satisfactorily covered in a full application.

Wider pedestrian connectivity and public realm improvements

- 5.36 The Council has an aspiration to provide a link from Dingwall Road through to the interior of the Southern House block, in view of a potential future redevelopment of the wider New Town block. This is to strengthen the East-West connection from East Croydon to the Town Centre and Old Town beyond.
- 5.37 The optimal pedestrian route into the wider urban context, including to connect most effectively with the Foster Masterplan/Ruskin Square scheme, would be through the neighbouring Carolyn House site to the north. The final landscaping proposals for the Carolyn House site have not yet been approved, and there may be an opportunity to create a through route as part of the landscaping proposals for Carolyn House (and this is currently being explored). However, in the event a through route is not able to be secured through the Carolyn House, then the site layout for 17-21 Dingwall Road will need to provide a pedestrian route through the site.
- 5.38 As part of TfL's Dingwall Road Loop scheme that looks to extend the local tram service along Dingwall Road, a strip of land approximately 4 metres wide along the frontage of the Job Centre site (i.e. 17-21 Dingwall Road) is required. The Council is also currently working on developing enhanced urban realm along

Dingwall Road which will hopefully be delivered in parallel with the tram extension. The proposal takes account of the tram scheme in its design and allows opportunity for public realm improvement works.

The environmental impact and sustainability of the development

- 5.39 It is essential that the proposed towers do not have a significant adverse impact on wind conditions within and surrounding the site. In this regard, any subsequent application must be accompanied by a detailed wind assessment, which must also model the cumulative impacts of the scheme when added to the adjacent consents.
- 5.40 Any adverse impacts must be mitigated through interventions that are also appropriate in townscape terms.
- 5.41 New development should make the fullest contribution to minimising carbon dioxide emissions and should incorporate on site renewable energy generation. Zero carbon is sought for the 2016-2031 period. A detailed sustainability strategy has not yet been provided. This prevents officers from being able to make comment on the acceptability of this element of the scheme. The applicant will be required to meet the above policy requirements in order for the scheme to be supported. Provision will need to be made within the buildings to allow connection to any future Croydon District Heating Network.
- 5.42 Full discussions in relation to air quality, overheating, surface water drainage, microclimate, lighting impacts and electronic interference have yet to be held, but the developer is aware of the relevant policy requirements. The subsequent application must be accompanied by a detailed Flood Risk Assessment and Sustainable Urban Drainage Strategy.

Other Planning Matters

- 5.43 Consideration will need to be given as to the requirement for any planning obligations required to mitigate the impact of the development.

Conclusion

- 5.44 While the scheme is developing well, there are a number of key concerns, including the lack of a pedestrian through route to connect the site from Dingwall Road to the western part of the New Town block. Additionally, at this early stage, many of the detailed planning requirements (e.g. energy efficiency/carbon reduction strategy) have yet to be undertaken.
- 5.45 The applicant has indicated their intention to address the outstanding matters, and a Planning Performance Agreement is in place setting out a clear work programme to be followed to ensure an acceptable scheme comes forward at the planning application stage.