

NOTES

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Basis of drawing: Survey 101932 and 1:2500 Ordnance Survey Map under Standard Form Contractor License to London Borough of Croydon made on 31 March 2015. Tolerances are based on Ordnance Survey tolerances at 1:2500

0m 10m 20m 50m

THE APPLICATION SITE BOUNDARY IS DRAWN ON THE CENTRE LINE OF PARTY STRUCTURES WHERE KNOWN AND BOUNDARY LINES FROM OS PLAN INFORMATION.

THE RED LINE AT SCALE OF 1:1000@A1 / 1:2000@A3 HAS A THICKNESS THAT DOES NOT ILLUSTRATE PROPERTY UNDERNEATH THE LINE.

KEY

□ APPLICATION SITE BOUNDARY

REVISIONS

REV	DATE	DESCRIPTION



STATUS

# PLANNING

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JOB

**FAIR FIELD**  
**CROYDON**

TITLE

**HYBRID PLANNING APPLICATION**  
 Application Site Boundary

DRAWN	JOB #	DRG #	REV
	<b>607</b>	<b>19000-10</b>	
CHECKED	SCALE	SIZE	DATE
DW	1:1000 1:2000	A1 A3	NOV 16 8/12/16



## PART 7: Planning Applications for Decision

## Item 7.1

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**1 APPLICATION DETAILS**

Ref: 16/00944/P

Location: Land bounded by George Street, London-Brighton railway line, Barclay Road and Park Lane.

Ward: Fairfield

Description: Outline planning permission for demolition and redevelopment to provide: flexible class A1 (shops) and/or class A2 (financial and professional services) and/or class A3 (food and drink); class B1 (business); class C1 (hotel); class C3 (dwelling houses); class D1 (non-residential institutions); class D2 (assembly or leisure); public realm and landscaping; and associated car and cycle parking, servicing, and access arrangements (with all matters reserved); and

Full planning permission for demolition including multi-storey car park and Barclay Road Annexe; extensions and alterations to Fairfield Halls including class A3 (food and drink); erection of buildings for flexible class A1 (shops) and/or class A2 (financial and professional services) and/or class A3 (food and drink) and/or class D1 (non-residential institutions) and/or class D2 (assembly and leisure) and class C3 (dwelling houses); change of use of basement car park (part) to class D1 (non-residential institutions); public realm and landscaping; and associated car and cycle parking, servicing, and access arrangements.

Documents: Development Specification (February 2017) and Design Guidelines (February 2017).

Drawing Nos: Hybrid & Full: 607-19000-01-P1, 607-19000-10, 607-19105. Full Planning Element: 607-19100-P1, 607-19101-P1, 607-19102-P2, 607-19103-P2, 607-19106-P1, 607-19107-P1. Fairfield Halls: 607-19501-FH, 607-19510-FH, 607-19511-FH-P1, 607-19512-FH, 607-19513-FH, 607-19514-FH, 607-19515-FH, 607-19516-FH, 607-19517-FH, 607-19518-FH, 607-195120-FH, 607-19525-FH, 607-19526-FH, 607-19502-FH-P2, 607-19550-FH-P1, 607-19551-FH-P2, 607-19552-FH-P2, 607-19553-FH-P1, 607-19554-FH-P1, 607-19555-FH-P2, 607-19556-FH-P2, 607-19557-FH-P1, 607-19558-FH-P1, 607-19559-FH-P2, 607-19565-FH-P2, 607-19566-FH-P2, 607-19570-FH-P1, 607-19571-FH-P1. Residential: 607-19610, 607-19611, 607-19600-R-P1, 607-19650-R-P1, 607-19651-R-P1, 607-19652-R-P1, 607-19653-R-P1, 607-19654-R-P1, 607-19655-R-P1, 607-19656-R-P1, 607-19657-R-P1, 607-19658-R-P1, 607-19659-R-P1, 607-19660-R-P1, 607-19661-R-P1, 607-19670-R-P1, 607-19671-R-P1, 607-19672-R-P1, 607-19673-R-P1, 607-19680-R-P1, 607-19681-R-P1, 607-19682-R-P1, 607-19683-R-P1, 607-19684-R-P1, 607-19685-R-P1. Landscaping & Public Realm: 981091-10-000-C, 981091-10-005-C, 981091-10-020-B, 981091-10-021-C, 981091-10-022-C, 981091-10-023-B, 981091-10-024-B, 981091-10-025-C, 981091-20-001-B, 981091-20-002-B,

981091-20-003-B, 981091-20-004-B, 981091-20-005-B, 981091-20-006-C, 981091-20-008-B, 981091-20-009-B, 981091-20-010-B, 981091-30-001-B, 981091-30-002-B, 981091-30-003-B, 981091-30-004-B, 981091-30-005-B, 981091-30-006-A, 981091-30-007-A, 981091-40-001-B, 981091-40-002-B, 981091-40-003-B, 981091-40-004-B, 981091-40-005-B, 981091-40-008-A, 981091-40-012-A, 981091-40-013-A, 981091-40-016-A, 981091-50-002-B, 981091-50-004-B, 981091-50-006-A, 981091-50-007-A. Gallery & Car Park: 607-19700, 607-19701, 607-19710-CP-P2, 607-19711-CP-P2, 607-19810-RG-P2, 607-19820-RG-P2. Outline Planning Element: 607-19010-01-P1, 607-19010-02-P1, 607-19010-03-P1, 607-19010-04A-P1, 607-19010-04B-P1, 607-19010-04C-P1, 607-19010-05-P1, 607-19010-06-P1, 607-19010-07-P1, 607-19010-08-P1, 607-19010-09-P1, 607-19010-10-P1, 607-19010-11-P1, 607-19010-12-P1, 607-19010-13-P1, 607-19010-14-P1, 607-19010-15-P1. Drainage Strategy Drawings: MMD-350840-C-SK-XX-XX-000004(P6), MMD-350840-C-SK-XX-XX-000005 (P6), MMD-350840-C-SK-XX-XX-000006 (P4), MMD-350840-C-SK-XX-XX-000007(P4), MMD-350840-C-SK-XX-XX-000008(P4)

Applicant: LBC Housing Development & Regeneration

Agent: Turley

Case Officer: Graham Harrington

- 1.1 This application is being reported to Planning Committee in view of its definition as a Large Scale Major development, the number of objections received in respect of the initial proposals and as directed by the Director of Planning and Strategic Transport.

## **2 BACKGROUND**

- 2.1 The scheme was presented to the Planning Committee in July and October 2015. Comments raised by Members during these presentations were as follows:

### July 2015

- Principle of uses - acceptable with an active square, providing sports, skateboarding and performance areas, dynamic Box Park type activities;
- Amount of affordable housing - should be maximised - targeting 30%; with right amount of family housing, with some 4-bed units;
- Appearance of development - Architectural style can be modern, imaginative and different, that fits in but is not 'Croydon vernacular'. Massing should provide a deliverable scheme, with the potential of some higher massing at the north end. Connectivity and routes through the scheme are very important, particularly link from the station and George Street through to Park Lane. Needs to be level, accessible, including friendly positive spaces. Wheelchair access important for the units and around the site. Side of the Fairfield Halls has potential for projections. . Active frontages should be around the site and fronting onto College Road;
- Effects on adjacent occupiers - the servicing provision must work with young families nearby;
- Quality of new residential accommodation - importance of the buildings engaging with the square; quality of design an important factor;
- Sustainability of development - viability of the halls; the scheme should improve on the current viability;

- Parking provision - support for the removal of parking outside the halls but need to ensure an appropriate amount of parking in the scheme to take account of the requirements of Fairfield Halls;

### October 2015

- Whilst there was concern about the level of affordable housing proposed in Phase 1 (15% intermediate) there was recognition of the need to deliver step change improvements to The Fairfield Hall as part of the Phase 1 works;
- Members retained the desire to maximise affordable housing delivery – seeking 30% affordable housing across future phases;
- The scheme needs to further explore (Phase 1 and later phases) opportunities to increase the number of residential units (to facilitate a higher level of affordable rented homes) whilst not overly compromising design quality;
- Concern about future phases which may not happen - how is the scheme future proofing this possibility?
- Mixed community scheme was considered very positive;
- Member questioned how many of the 27% 3-4 bed homes in Phase 1 are 4-bed? (Officer Response - 13 or 8.5%);
- Parking for residential units will be critical (including cycle and motor cycle spaces) - must get the right balance to ensure that there remains adequate on-site parking for The Fairfield Halls to operate effectively in future years;
- Need to accommodate facilities provided by Southwark Diocese in St Matthew's House as part of the phased development;
- Concerns raised over lost revenue generated by the Fairfield Halls whilst works are underway;
- The desire to attract high profile events to The Fairfield Halls in the future;
- The need to properly assess the policy implications of any reductions community related floorspace and/or provision;
- There was a general understanding that Croydon College are keen to make more efficient use of space, but Members were keen to understand the level of reduction of educational floorspace. There was recognition however that the community uses debate should be focused on function rather than floorspace;
- Members were keen to ensure that space to be occupied by Croydon College in the future is fit for purpose – and will allow the College to further develop its services (especially expanding its university offer);
- Free use of performance space within the re-landscaped College Green encouraged;
- Importance of creating modern open areas for comfortable/useable/lively/active spaces;
- College Green should be part of a public square, rather than a garden, which has not worked;
- Suggestion of involving young people in consultation on the design of the public realm - particularly with regard to the skating areas;
- General encouragement to provide sustainable energy (including Solar Panels);
- Design Guidelines should include the possibility of a colonnade treatment along George Street and explore the creation of multi-functional spaces.

2.2 Informed by the above feedback, discussions with officers, the GLA/TfL, local people and other, the proposed scheme was further developed and a planning application was submitted on 24 February 2016. Revisions to the application and further

environmental information were submitted on 13 December 2016 and additional further environmental information was submitted on 18 January 2017.

- 2.3 The planning application is for 'council own' development and constitutes a 'Regulation 3' application in the context of Section 316 of the Town and Country Planning Act 1990, meaning that the requirements of the Town and Country Planning General Regulations 1992 apply. For clarity, in this report the Council as applicant is referred to as 'the Applicant' and the Council as Local Planning Authority (LPA) is referred to as 'the LPA'.

### **3 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- 3.1 The proposed high-density, residential-led mixed use development is in accordance with adopted and emerging policy and guidance and would support growth in the Croydon Opportunity Area (COA). The proposals would provide a welcome net increase in Business (B1) floorspace and would make a significant positive contribution to meeting the pressing need for additional housing. Whilst the site would not normally be a sequentially preferable location for retail use, emerging policy proposes to extend the Primary Shopping Area to include the George Street frontage (Blocks 1, 2 and part of 3). The proposed retail uses should not have an adverse impact on the town centre and would help ensure active and safe frontages. The proposed hotel use in Block 3 (a highly accessible location) is acceptable and would be a similar sized facility to the one that has already been permitted on the adjoining College East site.
- 3.2 The proposed refurbishment of Fairfield Halls and new art gallery are welcome and would significantly strengthen the Fair Field area as Croydon's cultural quarter. The proposed movement of Croydon College into a smaller more efficient building on site and the closure of the Magistrates and Family Courts as part of a rationalisation of Ministry of Justice buildings are acceptable. So too is the need to relocate an existing small chapel associated with the Diocese of Southwark's Croydon Area Mission Team.
- 3.3 The proposed housing in the 'Detailed' element of the proposed scheme would be of high quality (meeting all relevant floorspace, amenity and play space standards) and whilst there would be less family-sized housing than policy requires, the overall regenerative benefits make this acceptable. Whilst daylight and sunlight conditions for some homes in Blocks 4 and 5 would be below the recommended standards, the overall level of amenity for future occupiers would be acceptable. The proposed Parameter and Design Guidelines for the 'Outline' element generally provide a good framework for achieving high quality housing and proposed conditions would secure a policy compliant dwelling mix.
- 3.4 Subject to a review of the Applicant's Financial Viability Appraisal that takes account of the recently announced Coast to Capital Local Enterprise Partnership grant of £14.2m towards the proposed scheme, the proposed 15% on-site affordable housing provision (in the form of shared ownership tenure) in the 'Detailed' element is considered to be the maximum reasonable amount of affordable housing possible. Likewise, the proposed minimum 15% on site affordable housing (with a policy compliant 60:40 affordable rent/shared ownership split in favour of affordable housing) in the 'Outline' element is considered to be the current maximum reasonable amount in light of viability considerations. This would be subject to an

upward only review and increased provision if viability improves over the 15 year build-out period.

- 3.5 The impact that the expected net increase in population of 5,568 from the development would have on school and health services is considered manageable. New housing would be delivered over a 15 year period, enabling the Council and NHS to increase school places and primary health care facilities, and it is recommended that a planning condition gives the NHS Clinical Commissioning Group the opportunity to take a lease on the non-residential space in Phase 1A before it is marketed for other purposes. The development is also currently expected to generate approximately £7.4m Croydon CIL payments to help fund such provision.
- 3.6 The proposed master planning of the site would deliver significant improvements in terms of connectivity, permeability and accessibility – with safe, attractive and step-free pedestrian and cycle routes being created. The proposed scale and massing and its likely impact on townscape and protected views and landmarks is considered acceptable. Furthermore, subject to reserving some details for further consideration, the proposed architecture and landscaping works for the ‘Detailed’ element are of a high quality and are welcome. The proposed Parameter Plans and Design Guidelines would provide a good framework for subsequent detailed design for the ‘Outline’ element.
- 3.7 The proposed reconfiguration of College Green (Local Open Land) would result in a small net increase in its area and subject to reserving some details for further consideration, would provide a satisfactory high quality open space of an appropriate character.
- 3.8 The proposed loss of the Fairfield Campus locally listed building is considered acceptable given the wider public benefits that it would enable and the expected high quality replacement buildings and spaces. Planning conditions would ensure that the existing ‘Minerva’ and ‘Vulcan’ carved figures on the Park Lane frontage would be incorporated in to the wider proposals and that a full photographic survey would be undertaken. Subject to reserving some details for further consideration, the proposed extensions and external works to the locally listed Fairfield Halls would be high quality and the wider proposals would improve the setting of this important building.
- 3.9 The scale and massing of the proposed development would have an acceptable impact on the character and appearance of nearby listed buildings, Croydon Central Conservation Area, Chatsworth Road Conservation Area, nearby locally listed buildings and locally listed parks and gardens (Queens Gardens, Park Hill Recreation Ground and Whitgift Almshouses). The archaeological interest of the site would be safeguarded by a proposed planning condition requiring an archaeological survey.
- 3.10 Whilst there would be a significant reduction in public car parking provision, there would be a sufficient number of spaces (349) to allow for a successful Fairfield Halls and a positive contribution to the vitality and viability of the COA, in line with adopted Parking Scenario 2 in the OAPF. The proposed limited levels of private car parking and generous levels of cycle parking are in line with policy objectives to restrain car use, prioritise ‘Blue Badge’ parking for disabled drivers/passengers and encourage walking and cycling. The proposed vehicular, cycle and pedestrian access and servicing arrangements and sustainable transport measures (including car club spaces and travel planning) are acceptable and the proposals would result in a reduction in vehicular traffic. Subject to planning conditions and obligations to secure

the improvement of transport infrastructure, the impact on the wider public transport network is considered acceptable.

- 3.11 The proposals would have an acceptable impact on the amenities of the occupiers of nearby homes in terms of daylight and sunlight, noise, outlook, privacy and wind.
- 3.12 The energy strategy would exceed policy requirements for a 35% reduction in carbon dioxide emissions over and above current Building Regulations through a range of 'Lean', 'Clean' and 'Green' measures. These include a communal heating network that would be designed to plug in to a wider town centre district heating network. Subject to planning conditions requiring commitment to BREEAM 'Excellent', meeting water usage targets, managing construction waste and sustainable urban drainage (SUDS), the proposals would meet the key environmental standards required by planning policy and would not result in any flooding problems.
- 3.13 The application would allow for one or more of the approved schemes (101 George Street, College East and Mondial House) to be developed and would allow for the partial implementation of an approved Fair Field scheme to sit alongside one or more of these approved schemes in an acceptable way.
- 3.14 The proposals have attracted a number of objections on a range of issues, primarily around the proposed works to Fairfield Halls and the effects the proposals would have on the character and appearance of the Central Croydon and Chatsworth Road Conservation Areas. Those material concerns expressed by local residents and local groups are addressed in the report and the proposals are considered acceptable subject to the provisions set out in the recommended planning conditions and obligations.
- 3.15 Full consideration has been taken of the environmental information in the Environmental Statement, and two submissions of further information received (including the ES Addendum and its Supplement), representations made by consultation bodies and representations made by any others about the environmental effects of the proposed development. The necessary measures to mitigate adverse effects would be secured by the recommended planning conditions and obligations and the likely significant effects of proposed development are considered acceptable.
- 3.16 The NPPF is underpinned by a presumption in favour of sustainable development. Officers consider that with the recommended mitigation, planning conditions and obligations in place, the scheme is consistent with national policy. For the reasons addressed in this report, there are no other material considerations which officers consider outweigh the grant of planning permission. In light of the above, the application is recommended for approval.

## **4 RECOMMENDATION**

- 4.1 That the Committee resolve to GRANT planning permission subject to:
  - A. Any direction by the London Mayor pursuant to the Mayor of London Order
  - B. Any direction by the Secretary of State pursuant to the Consultation Direction
  - C. That the Director of Planning and Strategic Transport is delegated authority to issue the planning permission and impose conditions (including the Heads of

Terms for planning obligations to be secured for each Block further to Condition B3) and informatives to secure the matters set out below.

### **Phase 1A ('Detailed' Element)**

- A1. Affordable Housing - Minimum 18% by hab rooms, subject to an upward only Review Mechanism(s). 100% Shared Ownership, affordability criteria, located in Building C, wheelchair accessible units, occupiers to have use of communal open space/play and car parking spaces. Units to be provided before more than 50% market units are provided.
- A2. Accessible Dwellings – 22 dwellings (10% 'wheelchair adaptable' and all others to be 'accessible and adaptable').
- A3. Opening Hours (A1/A2/A3/D1/D2 uses excluding the Fairfield Halls, cloister and gallery) - 07.00 to 23.30.
- A4. Use of ground floor unit Building C - Marketing as health facility by Croydon CCG before use for other purpose.
- A5. Employment & Skills Plan – measures to maximise local employment
- A6. Meanwhile Treatment Strategy – Interim boundary and surface treatments with adjoining Blocks.
- A7. Ventilation Details.
- A8. Air handling Units/Plant/Machinery Noise.
- A9. Noise Standards - Living Rooms and Bedrooms.
- A10. Ground Investigation - Contaminated Land.
- A11. Ground Contamination Verification Report.
- A12. Unexpected Contamination.
- A13. Archaeological Written Scheme of Investigation.
- A14. Non-residential Development (new-build element) – BREEAM 'Excellent'.
- A15. Non-residential Development (new build element) – Energy – CO2 savings over current Building Regulations (i.e. in effect February 2017) of 47% Commercial Units in Building C, The Gallery 37%, Extensions to Fairfield Halls 38%.
- A16. Residential Dwellings – Energy and Water Standards – CO2 savings over current Building Regulations (i.e. in effect February 2017) of 64% and designed to comply with a consumption rate of 105 litres/person/day.
- A17. Communal Heating Network – to serve all of Phase 1A and be designed to connect to Phases 2 and 3 and facilitate connections with the proposed wider Town Centre District Heat Network.
- A18. Fairfield Halls - CHP Plant – Air Quality (specification to meet NOX standard).
- A19. Surface Water and Foul Drainage – Thames Water Impact Study, details and management & maintenance.
- A20. Wind Mitigation – balcony details.
- A21. Detailed Drawings and External Materials (Buildings) – External material sample boards, detailed sections, detailed elevations & Method Statement for Fairfield Halls.
- A22. Detailed Drawings and External Materials (Landscape) – Gates, play equipment, signage, material samples & bus shelter.
- A23. College Green Details – Lighting, street furniture, Gallery skylights, indicative uses/programme.
- A24. Public Realm and Landscaping Details – Notwithstanding approved drawings - Details for Barclay Road and Park Lane frontages (existing and proposed cycle routes) & surface materials throughout.
- A25. External Lighting – Details of lighting.
- A26. Trees and Planting – 5 year replacement.
- A27. Living Roofs (Buildings A, C and D) – Details.



- A28. Provide at least 3 Bird & Bat boxes ) – Details.
- A29. Shopfronts (Building C) – Details.
- A30. Fairfield Halls - Photographic Survey Written Scheme (External only).
- A31. Fairfield Halls - Details of proposed PVs on roof.
- A32. Arnhem Gate - Photographic Survey.
- A33. Public Realm Access and Management & Maintenance Scheme.
- A34. Parking Management- Provision of cycle parking, motorcycle parking and Blue Badge car parking prior to first occupation and subsequent management.
- A35. Car Club Space – 1 space prior to first occupation & initial membership for residents.
- A36. Electric Vehicle Charging Points (20% active & 20% passive).
- A37. Delivery & Servicing Plan – Residential.
- A38. Delivery & Servicing Plan – Gallery.
- A39. Fairfield Halls - Service Yard Management Plan.
- A40. Fairfield Halls - Forecourt Management Plan – Details to be submitted for approval.
- A41. Detailed Residential Travel Plan.
- A42. Detailed Gallery Travel Plan.
- A43. Detailed Fairfield Halls Travel Plan.
- A44. Fairfield Halls Directional Signage Strategy & Signs.
- A45. Restriction of Parking Permits.
- A46. Pedestrian Access – Details of step-free route between George Street and the proposed lowered podium.
- A47. Transport Mitigation - Enter in to a legal agreement with or provide an Undertaking to TfL to secure appropriate public transport mitigation measures prior to the occupation of any residential dwellings.
- A48. Highway Mitigation – Enter in to a legal agreement to provide highway works prior to occupation of any residential dwellings.
- A49. Excluded Works Construction Environmental Management Plan.
- A50. Main Works Construction Environmental Management Plan.
- A51. Excluded Works Demolition Logistics Plan.
- A52. Excluded Works Construction Logistics Plan.
- A53. Main Works Construction Logistics Plan.
- A54. Trees – Protection during site preparation - Demolition and Construction.
- A55. Piling Risk Assessment.
- A56. Time Limit.
- A57. Compliance with Drawings.
- A58. Any other condition(s) considered necessary by the Director of Planning and Strategic Transport.

#### **Common Conditions – All Blocks ('Outline' element)**

- B1 Reserved Matters.
- B2. Future s.106 Agreements – No development shall be carried out in a Block or part of a Block (except Excluded Works) until all relevant owners enter in to s.106 Agreement in accordance with the Heads of Terms set out below.
- B3. Opening Hours (A1/A2/A3/D1/D2 uses) – 07.00 to 23.30.
- B4. Meanwhile Treatment Strategy – Mechanism for provision of interim boundaries & interim public realm and landscaped area (including use) in Blocks and adjoining Blocks.
- B5. Ground Investigation - Contaminated Land.
- B6. Contaminated Land - Verification Report.
- B7. Unexpected Contamination.

- B8. Archaeological Written Scheme of Investigation.
- B9. Surface Water and Foul Drainage - Thames Water Impact Study, details and management & maintenance.
- B10. Public Realm Access and Management & Maintenance Scheme.
- B11. Parking Management.
- B12. Highway Mitigation – Enter in to a legal agreement to provide highway works prior to occupation of any residential dwellings/non-residential floorspace.
- B13. Excluded Works Construction Environmental Management Plan.
- B14. Main Works Construction Environmental Management Plan.
- B15. Excluded Works Demolition Logistics Plan.
- B16. Excluded Works Construction Logistics Plan.
- B17. Main Works Construction Logistics Plan.
- B18. Trees – Protection - Demolition and Construction.
- B19. Piling Risk Assessment.
- B-20. Time Limits.
- B21. Compliance with Development Specification, Parameter Plans and Design Guidelines.
- B22. Any other condition(s) considered necessary by the Director of Planning and Strategic Transport.

### **Block 1 Specific Conditions**

- 1.1 Wind Mitigation – Trees and canopies between Blocks 1 and 4 and chamfered north-west corner.

### **Block 2 Specific Conditions**

- 2.1. Accessible Dwellings - 10% 'wheelchair adaptable' and all others to be 'accessible and adaptable'.
- 2.2. Dwelling Size Mix – Minimum 20% 3-bed and 35% 2-bed 4-person or in the alternative the adopted policy/guidance requirement at the time the relevant Reserved Matters applications are determined.
- 2.3. Residential Dwellings – Water Standards designed to comply with 105 litres/person/day.
- 2.4. Pedestrian Access – Accommodating step-free route between George Street & proposed lowered College Green podium.

### **Block 3 Specific Conditions**

- 3.1. Accessible Dwellings – As Block 2.
- 3.2. Accessible Hotel Rooms (if provided) – At least 10%.
- 3.3. Dwelling Size Mix – As Block 2.
- 3.4. Residential Dwellings – Water Standards – As Block 2.
- 3.5. Pedestrian Access – As Block 2.
- 3.6. Wind Mitigation – Overhead & lateral shielding within rooftop amenity space.
- 3.7. Aviation Lighting.

### **Block 4 Specific Conditions**

- 4.1. Accessible Dwellings – As Block 2.
- 4.2. Dwelling Size Mix – As Block 2.
- 4.3. Residential Dwellings – Water Standards – As Block 2.
- 4.4. Daylight and Sunlight – Detailed report to accompany Reserved Matters application.
- 4.5. No Demolition until contract let for replacement building.
- 4.6. Fairfield Campus Building - Photographic Survey Written Scheme (external only).

- 4.7. Pedestrian Access – As Block 2.
- 4.8. Carved Figures of Minerva and Vulcan – Removal & incorporation within the Site.
- 4.9. Wind Mitigation – Trees adjacent to western entrances & between Blocks 1 & 4.

#### **Block 5 Specific Conditions**

- 5.1. Accessible Dwellings – As Block 2.
- 5.2. Dwelling Size Mix – As Block 2.
- 5.3. Residential Dwellings – Water Standards – As Block 2.
- 5.4. Daylight and Sunlight – As Block 4.
- 5.5. No Demolition – As Block 4.
- 5.6. Fairfield Campus Building - Photographic Survey – As Block 4.
- 5.7. Pedestrian Access – As Block 2.

#### **Block 6 Specific Conditions**

- 6.1. Accessible Dwellings – As Block 2.
- 6.2. Dwelling Size Mix – As Block 2.
- .
- 6.3. Residential Dwellings – Water Standards – As Block 2.

#### **Block 7 Specific Condition**

- 7.1. Meanwhile use Strategy – to manage the meanwhile use of the existing Fairfield Campus Building (if no contract exists for its demolition).

Any other Block Specific condition(s) considered necessary by the Director of Planning and Strategic Development.

#### **Heads of Terms**

The following are heads of terms for planning obligations to be secured by s106 Agreements required by Condition B3 – recognising that these will need to be reviewed as and when Croydon's Regulation 123 List (which identifies infrastructure that will, or may be, wholly or partly funded by CIL) is revised.

- (a) Affordable Housing -15% by unit minimum subject to an upward only Review Mechanism(s), 60:40 Affordable Rent: Shared Ownership, affordability criteria, 10% 'wheelchair user' dwellings, occupiers to have use of communal open space/play and car parking spaces and to be triggered by 50% market homes (Blocks 2 to 6).
- (b) Replacement community use – Block 1 Assembly & Leisure (D2) to be provided within the Site (Block 1).
- (c) Replacement community use within the Site (if required) – St. Matthew's House (Block 2).
- (d) Relocation Strategy (if required) – The Courts (Block 7).
- (e) Education and Health Strategy (Blocks 2 to 6).
- (f) Employment & Skills Plans and Financial Contributions - In accordance with the adopted policy/guidance requirement at the time that the relevant Reserved Matters applications are determined (All Blocks).
- (g) Connection to Communal Heating Network (All Blocks).
- (h) Non-residential Energy Standards – minimum 35% CO2 savings above current Building Regulations (i.e. in effect February 2017) but if 35% CO2 savings not met then cash in lieu in line with the Council's adopted cost per tonne of carbon at the time the relevant Reserved Matters applications are determined (All Blocks).

- (i) Residential Energy Standards – minimum 35% CO2 savings over current Building Regulations (i.e. in effect February 2017) but if 35% CO2 savings not met then cash in lieu in line with the Council's adopted cost per tonne of carbon at the time the relevant Reserved Matters applications are determined (Blocks 2 to 6).
- (j) Transport Financial Contributions – Enter in to a legal agreement with or provide an Undertaking to TfL to secure appropriate public transport mitigation measures in relation to each Block (All Blocks)
- (k) Payment of Transport Financial Contributions – Payment of the appropriate Transport Financial Contribution to be made prior to the occupation of any residential dwellings/non-residential floorspace in each Block (All Blocks).
- (l) Travel Plans (All Blocks).
- (m) Car Club – between 3 and 10 spaces (depending on monitoring/demand) & including initial membership for residents (Blocks 2-6).
- (n) Restriction of Parking Permits (Blocks 2 to 6).
- (o) Cessation of use of existing Croydon College Car Park - when parking in Phase 1B comes in to use (Blocks 5 and 7).
- (p) Cycle Hub – Co-operation with LPA to consider relocation (if necessary/required) (Blocks 2 and 3).
- (q) Safeguarding operation/re-provision of TfL sub-station (Blocks 2 & 3)
- (r) TV Signal Mitigation Strategy (Block 3).
- (s) Legal & Monitoring Costs (All Blocks).
- (t) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport.

#### **Informatives**

1. Positive & Proactive Approach.
2. Pre-commencement Conditions (need for).
3. Development is CIL Liable & CIL phased.
4. Public Highway – Strength of Decking Area.
5. Network Rail – Construction Method Statements.
6. Thames Water – Existing Main Sewer.
7. Signage on Fairfield Halls may need Advertisement Consent.
8. The operator of Fairfield Halls is encouraged to facilitate public access to the roof terrace, so that local people can enjoy views over College Green and the wider Croydon townscape.
9. The financial contributions to TfL to mitigate likely transport impacts shall be capped for Phase 1A and for individual Blocks in Phases 2 and 3.
10. The Applicant is encouraged to make full use of the Fairfield Campus Building if it remains once Croydon College moves in to a replacement building on Block 7 (relating to the space at Blocks 4 and 5).
11. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

4.2 That the Committee confirms that it has taken the environmental information that accompanied the application into account as required by Article 35(4) of the Town and Country Planning (Development Management Procedure) Order 2015.

4.3 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.



- 4.4 That the Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the Central Croydon and Chatsworth Road Conservation Areas as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.5 That the Committee confirms that adequate provision has been made, by the imposition of planning conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

## **5 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

- 5.1 The proposals are the subject of a 'hybrid' planning application – with Phase 1A being in 'Detail' and Phases 1B, 2 and 3 being in 'Outline' (all matters reserved).

#### *Phase 1A – 'Detailed' element*

- 5.2 This comprises detailed proposals for the following:
- Demolition of the existing multi-storey car park, Barclay Road Annexe and parts of the podium structure and excavation at basement level;
  - Retention and refurbishment of Fairfield Halls, including:
    - Remodelling the service areas and 'get-ins' at the rear of the building at ground and lower ground levels;
    - Removing a 1990s extension to the east elevation of the Arnhem Gallery;
    - Extending the northern elevation to introduce an active frontage facing on to a reconfigured College Green; and
    - Works to the roofs and facades including re-cladding and lighting.
  - Landscape and public realm works to College Green;
  - Creation of an art gallery (2,330 sqm) in part of the basement car park area (under College Green); and
  - Redevelopment of the multi-storey car park, Barclay Road Annexe and parts of College Green to provide a residential led mixed use development to provide 218 new homes and 505 sqm of flexible A1/A2/A3/D1/D2 space.

#### *Phases 1B, 2 and 3 (Blocks 1 to 7) – 'Outline' element*

- 5.3 This comprises the demolition of all of the other existing buildings and the redevelopment of a series of Blocks for a range of potential uses. Redevelopment would take place within defined parameters established by:
- A Development Specification (outlining minimum and maximum floorspaces for different uses and phasing);
  - A series of 15 Parameter Plans (covering the extent of demolition and excavation, minimum and maximum building footprints, public realm and open space, active frontages, minimum and maximum building heights, land uses and vehicular/pedestrian and cycle access); and
  - Design Guidelines (setting out guidance on how the parameter plans should be interpreted to ensure high quality development).
- 5.4 The proposed uses and minimum and maximum amounts of floorspace for each use for the 'Outline' element (Gross Internal Area) is set out in Table 1 below.

**Table 1: 'Outline' element (Blocks 1 to 7) proposed uses and amount**

<b>Use</b>	<b>Minimum and Maximum (sqm GIA)</b>
A1/A2/A3 (Shops/financial & professional services/restaurants & cafes)	3,217 to 10,670
B1 (Office, research & development & light industry)	30,842 to 96,651
C1 (Hotels)	0 to 8,342
C3 (Dwellings)	60,510 to 170,874
D1 (Non-residential Institutions)	19,967 to 43,948
D2 (Assembly & leisure)	1,284 to 11,842
Maximum development scenario	281,550

5.5 The likely maximum number of residential dwellings in the maximum residential scenario is 2,427 (2,209 in the 'Outline' element and 218 in the 'Detailed' Phase 1A). However, this cannot be fixed until the housing mix is determined through the approval of subsequent Reserved Matters applications.

#### *Access*

5.6 Proposed vehicular access arrangements are as follows:

- College Road retained to provide access to adjoining 'Outline' Blocks at grade and, via a ramp on Block 3 (Mondial House site), to basement parking and servicing for Blocks 1 to 5 and servicing for the detailed Phase 1A;
- Parking for the 'Detailed' Phase 1A (Fairfield Halls, Gallery and housing) to be accessed via Barclay Road, but with the ramp reduced from four to part two/part three lanes);
- Existing accesses to Fairfield Halls forecourt from Park Lane to be retained, although improved to safely accommodate coach traffic and modified, to provide for shared surfaces with priority for pedestrians and cyclists;
- Emergency and occasional controlled maintenance to be at ground/podium level via a new route between Fairfield Halls and the Courts building; and
- Existing Hazeldean Road vehicle access across the railway bridge to be stopped up – but bridge retained to provide pedestrian/cycle access to the Area.

5.7 Pedestrian and cycle access at ground level would be via College Road, a route between Park Lane and Hazeldean Railway Bridge (with new stairs and lift to provide connection with Hazeldean Road) and two new north-south routes between George Street and Barclay Road that would be created through the redevelopment of the Fairfield Campus building, the College Annex and the Courts building. The existing subways beneath Park Lane would be retained.

#### *Building Heights*

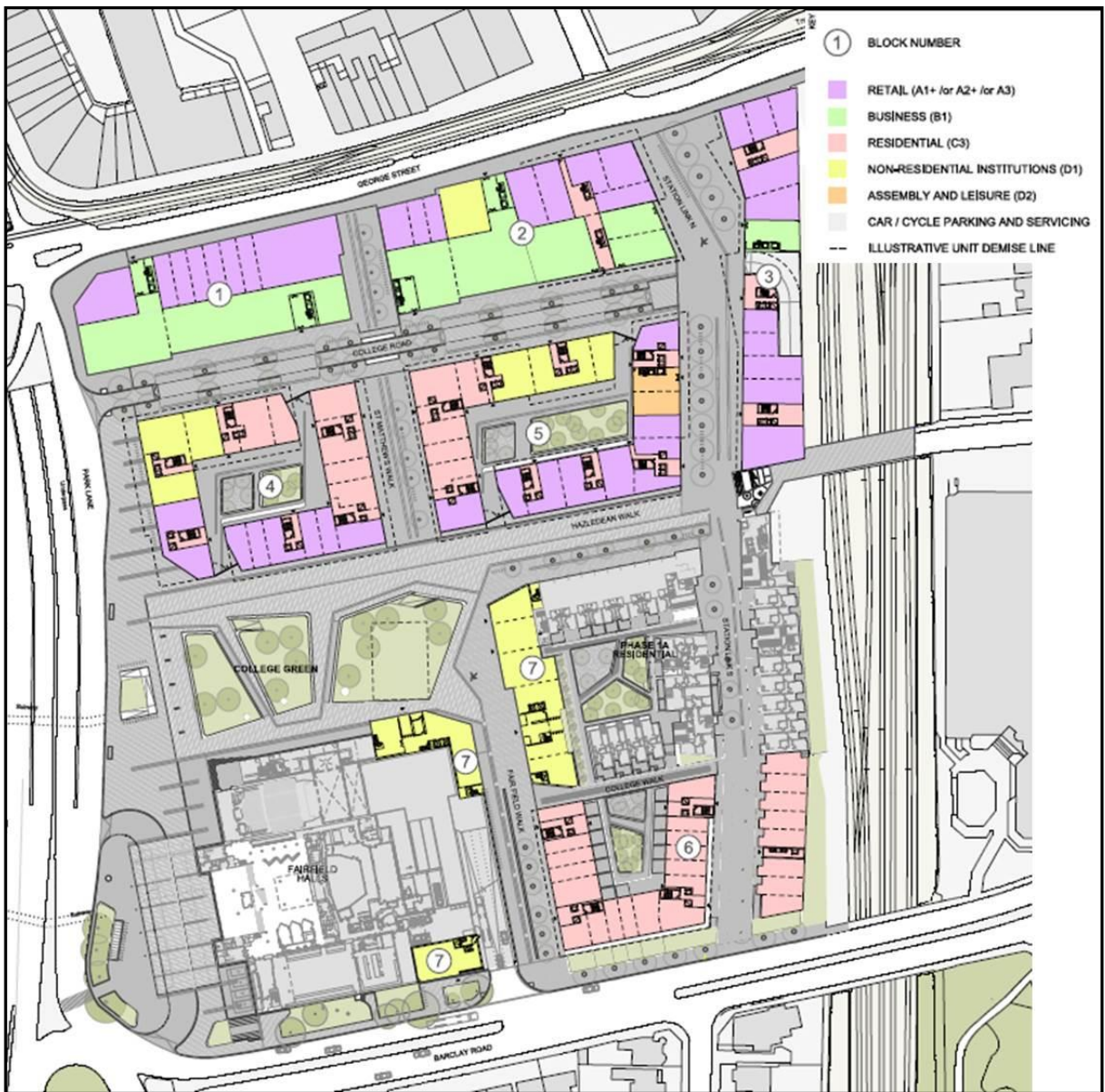
5.8 The Minimum and Maximum Parameter Plans for the 'Outline' element are based on metres Above Ordnance Datum (AOD), as this provides absolute heights for control purposes. The proposed building heights above ground, approximately based on 3.2m floor to floor heights for housing and hotel use and 4m for other non-residential uses, can be summarised as follows:

- Phase 1A residential (detailed) Building A: 21-storey, Building B: 8-storeys, Building C: part 6/part 8-storeys and Building D: part 4/6 and 7-storeys);
- Block 1 (Suffolk House): 17m-34m (4 to 9-storeys) at the lowest to 24m-42m (6 to 11-storeys) at the highest;
- Block 2 (Norwich Union House, St. Matthews House and 101 George Street): 14.5m-31.5m (4 to 9-storeys) at the lowest to 21.5m-39.5m (7 to 12 storeys) at the highest, with a taller element on the south-east corner of between 21.5m-64m (7 to 16-storeys);
- Block 3 (Mondial House): three towers extending from a lower 'plinth'. The plinth would be 23.5m-33m (7 to 11-storeys). The tallest tower at the George Street end of the Block would be 98.5m-110m (30 to 35-storeys), with the two other towers stepping down in height in a southerly direction to 76.5m-87m (23 to 27 storeys) and 61.5m-66m (19 to 20-storeys);
- Blocks 4 and 5 (Fairfield Campus Building): 16.5m-34m (5 to 10 storeys) at the lowest and 23.5m-40m (7 to 12-storeys) at the highest;
- Block 6 (The Courts): two elements ranging between 6m-18.5m (2 to 6 storeys) at the lowest to 9.5m-25m (3 to 8-storeys) at the highest; and
- Block 7 (D1-use buildings) the eastern building would be 15.5m (4 storeys) at the lowest to 24m-27m (6 to 7-storeys) at the highest. The western building, developed above the Fairfield Halls service yard would be 4m-9m (1 to 2 storeys) at the lowest and 22.5m-30m (5 to 9-storeys) at the highest.

### *Illustrative Scheme*

- 5.9 The applicant has prepared an Illustrative Scheme to test the proposed parameters and to show how the 'Outline' elements may be developed alongside the 'Detailed' elements for Phase 1A. The Illustrative Scheme represents the maximum floorspace deliverable within each Block, with the exception of Block 7. It has been used by the applicant for viability purposes and to help inform its Environmental Statement and Play Strategy. It should be noted that the Illustrative Scheme is not submitted for approval and officers do not necessarily endorse it as an acceptable way of implementing the proposed parameters.

### **Figure 1: Illustrative Scheme (Ground Floor Level)**



5.10 Table 2 below sets out the land uses and floor spaces that the Illustrative Scheme would provide.

**Table 2: Illustrative Scheme**

Use	Floorspace (sqm GIA)
A1/A2/A3 (Shops/financial & professional services/restaurants & cafes)	6,453
B1 (Office, research & development & light industry)	54,991
C1 (Hotels)	None
C3 (Dwellings)	190,688
D1 (Non-residential Institutions) and D2 (Assembly & leisure)	24,901
Basement car park (private and public parking)	23,285
	300,318

Note: This does not include existing floorspace to be retained.



## *Phasing*

- 5.11 Development is expected to come forward in three phases over the next 15 years. The refurbishment and extension of Fairfield Halls, the reconfiguration of College Green, redevelopment of the multi-storey car park and Barclay Road Annex and the replacement new College buildings are in Phase 1 (Years 0-5). The George Street and Fairfield Campus Blocks are in Phase 2 (Years 5-10) and the Magistrates and Family Courts are in Phase 3 (Years 10-15).

## **Site and Surrounding**

### *The Site*

- 5.12 The Site is roughly rectangular in shape and comprises around 7.1 hectares in area. It has road frontages onto George Street to the north, Barclay Road to the south and Park Lane to the west. To the east is the main London to Brighton railway line.
- 5.13 In the northern part of the Site fronting George Street are the office/retail buildings of Suffolk House, 96 George Street and Mondial House (4, 11 and 15-storeys respectively) and a 3-storey residential hostel – St. Matthews House. Land at 101 George Street is a cleared site that was occupied by the former Essex House office building. To the south of the above buildings and facing onto College Road is Croydon College (a part 5/part 6-storey locally listed building) which includes a basement car parking area at its eastern end.
- 5.14 At the south western corner of the Site is Fairfield Halls which is a locally listed building. There is a forecourt servicing area at the front of the Halls and a servicing area to the rear. In the south east corner is the part 4/part 5-storey Croydon Magistrates Court and Family Court (“the Courts”). Between the theatre and Courts is a vehicular access to the underground section of Fairfield Halls public car park and the 5-7-storey College Annex building.
- 5.15 Between Croydon College and the Fairfield Halls is an area of public open space known as College Green, which is designated as Local Open Land. This area comprises a podium that forms the roof to the Fairfield Halls public car park. To the east of the Green is multi storey section of the Fairfield Halls public car park. The car park can be accessed from Barclay Road and by a road bridge over the railway from Hazledean Road to the east. Adjacent to the car park and Croydon College is a series of vertical concrete panels known as the Arnhem Gate, referring to Croydon’s link to that town in the Netherlands.
- 5.16 Levels across the Site are complicated, with the ground ramping down from George Street to serve the adjoining Mondial House car park and the Croydon College basement parking area. There is a ramp down to a pedestrian subway under Park Lane and steps down to the public car park on the northern edge of Fairfield Halls.
- 5.17 There are signal-controlled surface level pedestrian crossing points immediately in front of the Fairfield Halls (across Park Lane) at the junction of Barclay Road and Park Lane, further along Barclay Road (between the Courts and Chatsworth Road) and at the junction of George Street and Park Lane. There are also two informal crossing areas on George Street (by 96 George Street and Mondial House) and a zebra crossing on College Road leading to the main Croydon College entrance.

- 5.18 The periphery of the Site (in particular) is well served by public transport, including East Croydon Station and Tramlink on George Street and bus routes along George Street and Park Lane and Barclay Road. The whole Site has a PTAL accessibility rating of 6b (on a scale of 1a- 6b, where 6b is the most accessible).
- 5.19 There are a number of trees along street frontages, pedestrian routes, in and around College Green and to the front of Fairfield Halls.

#### *Ownership*

- 5.20 The Council owns Fairfield Halls, College Green and Fairfield Halls Car Park (which is currently operated by NCP). It is also responsible for managing and maintaining College Road. Other land in the Site is in a variety of different private ownerships.

#### *The Surrounding Area*

- 5.21 To the north of the Site is the main office area of Central Croydon, including the Ruskin Square scheme, which is under construction and East Croydon Station. To the east, on the opposite side of the London-Brighton railway cutting, is the part 4/part 5-storey Croydon County Court building and beyond that the 23-26-storey "Altitude 25" residential tower. To the south is Barclay Road, which is fronted by mainly 2-storey houses and a 4-9-storey office building on the corner with Park Lane. To the west is Park Lane, which is part in underpass, beyond which is the 5-storey Segas House and 23-storey St. Georges House, Queens Gardens, Bernard Wetherill House and the Town Hall.
- 5.22 Segas House and the Town Hall are Grade II listed buildings and Queens Gardens is on the Council's Local List of Parks and Gardens. These buildings and spaces are within the Central Croydon Conservation Area and the area to the south of Barclay Road is within the Chatsworth Road Conservation Area. There are a number of locally listed buildings in the surrounding area.
- 5.23 TfL is responsible for managing and maintaining Barclay Road and the local highway authority (LBC) is responsible for the adjoining Park Lane and George Street. There are bus stops serving various routes along George Street and Park Lane and bus stands on Park Lane outside the main Croydon College building. The surrounding streets are within the Central Croydon Controlled Parking Zone.

#### **Planning History**

- 5.24 The following planning decisions are relevant to the application:

##### *Former Essex House site, 101 George Street*

- 11/00963/P - Erection of 17 storey building with basement parking area comprising a use within class A1 (retail) on ground floor and offices (business class A1) in remainder of building. Formation of vehicular access, landscaping, servicing and other associated works. This application was for renewal of an older consent. Granted but now expired.
- 14/01594/P - Erection of two buildings of 17 and 32 storeys comprising 305 residential units, 4 commercial units (use classes A1-A5) and a gym (use class D2); provision of new public piazza and associated landscaping, car parking, cycle and refuse storage. Granted (September 2015) but not implemented.
- Pre-application discussions – to render the scheme ready for implementation.

#### *College East site*

- 06/00854/P - Permission granted for erection of 29 storey building including 2 basement levels and plant areas at roof level providing a vocational college on the lower 10 floors, a fitness suite and plant area on 10th floor and 173 flats and a crèche on the upper floor; provision of associated parking in basement areas. Granted but now expired.
- 14/01603/P - Full planning permission is sought for the erection of a part 16/38 storey building (plus basement and mezzanine levels) comprising 159 residential units and a 225 bedroom hotel and restaurant (within use class A3); provision of associated amenity area, landscaping and car/cycle parking. Granted (December 2015) but not implemented.

#### *Main College site*

- 15/02686/P – Erection of a single storey extension to the western end of Croydon College's Fairfield Building to provide new hair and beauty reception and salon and new cafe/ bistro, as well as new entrance and external landscaping. Granted (October 2015) but not implemented.

#### *Mondial House 102 George Street*

- 16/00180/P - Demolition of the existing office building; erection of a 35/13/11 storey building comprising plus basement, to provide 220 flats, 1,787sqm B1 office space, and 490sqm A1 retail floor space with associated works. Resolution to grant permission, subject to S.106 Agreement (October 2016).

#### *Multi-storey Car Park (part of Fairfield Car Park)*

- 16/00382/P - Demolition of multi-storey car park and removal and replacement of an external staircase. Granted (March 2016) but not implemented.

## **6 CONSULTATION RESPONSE**

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

6.2 The following were consulted on the application as originally submitted, the revisions to the application and where appropriate, the two rounds of further environmental information:

#### **British Gas**

6.3 No comments received.

#### **Civil Aviation Authority**

6.4 No comments received.

#### **Design South East Review Panel**

6.5 The application as originally submitted was the subject of a Design Review in March 2016. This is addressed in the Design and Townscape section of the report.

## **Environment Agency (Statutory Consultee)**

- 6.6 No objections subject to conditions relating to ground contamination/controlled waters, details of sustainable drainage schemes and piling design. [OFFICER COMMENT: It is recommended that appropriate conditions and informatives are attached to any permission].

## **Gatwick Airport**

- 6.7 No comments received.

## **Greater London Authority (GLA) (Statutory Consultee)**

- 6.8 The Stage 1 Report (April 2016) on the application as originally submitted can be summarised as follows:

- The overall floorspace and land use mix is supported;
- The Applicant has addressed concerns raised at the pre-application stage and wider issue of the net loss of D1 community floorspace and this aspect of the application is compliant with the London Plan;
- Insufficient information on housing mix and affordable housing for the 'Outline' Element [OFFICER COMMENT: The application has been revised to include an indicative dwelling mix and specific affordable housing proposals];
- The dwelling mix for Phase 1A exceeds OAPF guidance and provides a good balance of accommodation. 15% Shared Ownership only is accepted as funds will be recycled to help renovate Fairfield Halls which is a clear link to community benefits in Croydon. [OFFICER COMMENT: Revisions have changed the proposed dwelling mix, which now does not meet the OAPF guidance];
- A Financial Viability Appraisal (FVA) should be the subject of independent review and shared with the GLA before Stage 2;
- The Applicant should assess and justify the density of the 'Outline' element [OFFICER COMMENT: The Applicant did this in its December 2016 revisions];
- The overall masterplan approach is strongly supported. However: (a) Blocks 4 and 5 would work more effectively as private courtyard spaces; (b) the proposed bridge link between the College buildings in Block 7 is a weakness; (c) some concern about massing and whether sufficient daylight would penetrate into shared courtyard spaces; (d) additional design principles should be included in the Design Guidelines, and; (e) rendered and wireframe views of the proposals should be prepared. [OFFICER COMMENT: Revisions and further information address these concerns, except the bridge link – which remains part of the proposals];
- The overall approach for Phase 1A is supported. However: (a) Some concern about proposed single-aspect homes in Building A (the tower); (b) the buildings would benefit from a warmer palette of materials and more emphasis on the crown of the proposed tower, and (c); units in Building D should be accessed College Walk. [OFFICER COMMENT: Additional windows have been introduced to provide dual-aspect homes and entrances have been provided on to College Walk];
- Detailed issues around access and inclusive design should be addressed. [OFFICER COMMENT: December 2016 revisions do this];
- Details should be provided on doorstep play provision for Buildings A and D. (OFFICER COMMENT: The Applicant has submitted a site-wide play strategy);
- Further details should be provided in respect of energy. [OFFICER COMMENT: The Applicant's revised energy and Sustainability Strategy provides this];



- The LPA should consider an independent review of the noise studies to ensure that the development is not adversely affected [OFFICER COMMENT: The original ES was independently reviewed by consultants and, as a result, further information on noise has been submitted];
- Some flood mitigation is likely to be needed and sustainable drainage solutions need to be considered [OFFICER COMMENT: revised surface and foul drainage strategies have been submitted, including appropriate mitigation measures];
- In terms of transport: (a) Additional information is needed on trip generation assessment, cycle provision, coach and taxi facilities – taxi provision to be increased; (b) Car parking provision for Croydon College and Fairfield Halls should be reduced – removing staff parking; (c) options for bus standing space should be investigated; (d) financial contributions towards transport improvements within the town centre should be secured; (e) the Car Park Management Plans, Forecourt Management Plan, Construction Logistics, Delivery and Service Plans, Travel Plans, EVCPs and Car Club spaces need to be secured and (f) Borough CIL to be used to fund wider public realm and cycle improvements. [OFFICER COMMENT: See TfL comments and officer comments below. Revisions, further information and recommended conditions and obligations satisfactorily address these issues].

### **Heathrow Airport**

- 6.9 No safeguarding objection to the proposal- although wind turbines can interfere with aviation radar [OFFICER COMMENT: No wind turbines are proposed].

### **Historic England (Statutory Consultee)**

- 6.10 This application should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice. [OFFICER COMMENT: The Council's Conservation Officer has provided advice].

### **Historic England - Archaeology (Statutory Consultee)**

- 6.11 There is a discernible but limited on-going archaeological interest (mainly in the northern and southern portions of the site) that should be conserved by way of a recommended planning condition [OFFICER COMMENT: It is recommended that archaeology conditions are attached to any permission].

### **Lead Local Flood Authority (Statutory Consultee)**

- 6.12 No objections subject to planning conditions relating to the outcome of the impact study called for by Thames Water and management and maintenance and, in relation to the 'Outline' element only, details for managing surface water in an 'exceedance' event. [OFFICER COMMENT: It is recommended that appropriate planning conditions and informatives are attached to any permission].

### **London Fire & Emergency Planning Authority**

- 6.13 No comments received.

### **Metropolitan Police – Designing Out Crime Officer**

- 6.14 No comments received.

## **Ministry of Defence**

6.15 No comments received.

## **National Planning Casework Unit – Department for Communities and Local Government (DCLG) (Statutory Consultee)**

6.16 No comments to make on this application.

## **NATS Safeguarding**

6.17 No safeguarding objection to the proposal.

## **Natural England (Statutory Consultee)**

6.18 No comments received.

## **Network Rail (Statutory Consultee)**

6.19 The proposed development could have a major impact on the safety of the railway - particularly during demolition and excavation works adjacent to the operational main line. As such, Network Rail requests the developer to contact them in order to agree an Asset Protection Agreement prior to works commencing on site. Network Rail also notes that there are plans to upgrade the Brighton Main Line in this area and requests the developer to contact them to obtain more information and discuss whether the upgrade project could have an impact on these proposals. [OFFICER COMMENT: the Applicant is understood to be in discussion with Network Rail, but it is recommended that an informative is included on the decision notice –].

## **Ofcom**

6.20 No comments received.

## **The Theatres Trust (Statutory Consultee)**

6.21 The Trust commented on the application as originally submitted, offering general support for the refurbishment of Fairfield Halls but raising concerns over the proposed access and get-in arrangements and the lack of detail about Building 7 and how it would integrate with the Halls. It strongly recommended that the Applicant identify a theatre/venue operator and involve them in the design process. In response, the Applicant invited the Trust to coordinate an Advisory Review of the scheme in June 2016 with a number of independent industry experts. The Trust assumes the Council has taken on board the detailed recommendations of the Review and welcomes the changes shown on the revised plans, such the revised forecourt layout, widened doors and entrance in the northern elevation of the Ashcroft Theatre, and the retained fire escape from the front of the stalls of the theatre.

6.22 The Trust is also pleased that the Applicant has begun the tender process to identify an operator and notes that many of the proposed alterations are 'options' to enable them to be delivered should the future operator consider it an important operational facility. Whilst it understands that internal alterations do not require planning permission, it would welcome the opportunity to review those works. It also queries how other matters discussed at the Advisory Review, such as the provision of

additional goods lift (which may be required by the operator for get in purposes), and alterations to the Ashcroft Theatre stage house and flying system, have been considered. Overall, the Trust is pleased with the progress made to the scheme, though given this building's importance to the cultural aspirations of Council and to wider town centre regeneration, the Trust continues to recommend the design be finalised once the venue operator is engaged to identify and assess the full range of alterations needed. [OFFICER COMMENT: The proposed works to Fairfield Halls are discussed in detail in the Material Planning Considerations section of this report. The Applicant has confirmed that a number of the recommendations have been taken on board including a "Get-In" solution, (with the potential for a larger solution should the operator install in future), protection and reinstate the organ in the Concert Hall and the increase in seats within the Ashcroft Theatre. It is understood that a specification has been shared with prospective operators to inform the procurement process].

### **Thames Water**

- 6.23 The existing waste water infrastructure is unable to accommodate the needs of the application and 'Grampian Style' condition should be imposed requiring a drainage strategy. In terms of surface water, the Applicant should attenuate flows to regulate flows in to the public network. Any piling must be carried out in accordance with an approved Method Statement, foundation design should be approved by Thames Water and groundwater discharge in to public sewers must be minimised. Informatives should be attached to any permission making clear that a public sewer and water main go across the site. [OFFICER COMMENT: It is recommended that appropriate conditions and informatives are attached to any permission].

### **Tramtrack (Croydon) Limited.**

- 6.24 No comments received.

### **Transport for London (TfL) Statutory Consultee)**

- 6.25 The application scheme and Transport Assessment and other supporting documents have been revised to take account of TfL's detailed comments on the application as originally submitted. TfL's comments on the application as revised are as follows:
- (a) Trip generation methodology and estimates, cycle parking, coach and taxi facilities are now acceptable;
  - (b) Car parking – proposed reduced levels of car parking for Croydon College and Fairfield Halls is now considered acceptable;
  - (c) Monitoring findings should be taken into account when planning provision for future phases;
  - (d) Bus standing space – accept that this is not possible on this Site, but there is a need for the Council and TfL to identify additional bus standing space elsewhere in the COA;
  - (e) Based on likely trip generation and impacts, financial contributions towards public transport improvements (including bus priority and infrastructure schemes and tram infrastructure) are required - £222,000 for Phase 1A and £2,909,000 for Phases 2 and 3;
  - (f) Car Park Management Plans, Forecourt Management Plan, Construction Logistics, Delivery and Service Plans, Travel Plans, EVCPs and Car Club spaces, residential parking permit restrictions and Legible London contribution need to be secured [OFFICER COMMENT: Revisions, further information and recommended

conditions and obligations satisfactorily address these issues apart from Legible London contribution, which is on the Council's Reg 123 List and cannot be the subject of a planning obligation];

- (g) Need to safeguard the existing TfL sub-station located in Phase 1A/Block 3 and gabling route between it and George Street [OFFICER COMMENT: Recommended conditions and obligations do this].

## UK Power Networks

6.26 No comments received.

## LOCAL REPRESENTATION

6.27 The application has been publicised by 19 site notices displayed within the application site and in the immediate vicinity. The application has also been publicised in the local press. The application has been further publicised in the same way following receipt of the December 2016 amendments (including the ES Addendum) and more recently in January 2017 following submission of further ES supplementary information). The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 381

Objecting: 381

Supporting: None – although many of those people objecting to the closure of Fairfield Halls explicitly support refurbishment in principle.

No of petitions received:

A petition with in excess of 8,000 signatures was presented to Council on 18 April 2016 regarding the closure of Fairfield Halls for refurbishment. The petition was worded as follows

"That Croydon Council reverse its current plans to close Fairfield Halls and instead work toward a phased development, which will keep this important landmark open to the community and prevent the loss of valuable jobs at the venue."

Following a debate, the petition was put to the vote and the no's had it. [The petitioners' request was not agreed]. It should be noted that the temporary closure of Fairfield Halls is not a material planning consideration. 'Closure' of a building does not constitute development that requires planning permission.

6.28 The following local groups/societies made representations:

- Mid Croydon Conservation Area Advisory Panel - Object to both the Outline and Full elements of the application (as originally submitted and as revised). Concerns that the proposed development of Fairfield Halls would be reduced in scale or added to the list of incomplete projects due to a lack of funding. The design of the



proposed detailed residential development is of no architectural merit. Very concerned about the outline proposals as these are very reminiscent of the 1960's area wide developments. Concern at the proposed demolition of Croydon College, since it is a good example of a building of the period. Considerable concerns over the visual canyon and wind effects on George Street and College Road. Concern at the number of large building projects in the centre of Croydon and the cumulative effect of these in terms of construction.

- Croydon Mobility Forum (23 March 2016) – Discussion and queries relating to accessible housing, levels of car parking, coach parking and level routes. Some concern about insufficient car and coach parking.
- Management Fairfield (Croydon) Limited (former operators of Fairfield Halls) – Object to the application as originally submitted on the grounds of the encroachment of the proposed replacement College building on to the service yard and resultant loss of parking, manoeuvrability, light and need for mechanical ventilation. These arrangements are not fit for purpose. Other objections include loss of a fire escape, reduction in car parking, insufficient parking for disabled people and removal of fire escape from the administration block.

6.29 The following Councillors have made representations:

- Councillor Helen Pollard - Supports the application. The redevelopment of Fairfield Halls is necessary and it is hoped that it will bring new life to Croydon's cultural offering. However, details need to be reviewed by the Planning Committee.
- Councillor Vidhi Mohan – Supports the application. I believe the redevelopment of the Site will lead to the regeneration of Croydon, promoting growth and jobs.

6.30 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

### **Objections**

- The total closure of Fairfield Halls (279) – concerns include (a) phased refurbishment should be undertaken (b) lack of alternative refurbishment models put forward (c) fear that the Halls will not open again;
- Detailed works to Fairfield Halls (15) – concerns include (a) encroachment of proposed replacement College (Building 7), (b) unacceptable access and servicing arrangements (c) narrowing of vehicular ramp from Barclay Road (d) need consultation with potential operators (e) support 'peer review' called for by the Theatres Trust (f) unsightly extensions and (g) loss of Harrison and Harrison organ;
- Loss of public open space/College Green (9);
- Reduction in car parking/inadequate car parking – public parking and parking for Fairfield Halls (9);
- Unspecified objection (grounds not clear) (9);
- Loss of Arnhem Gate (4);
- Replacement Croydon College (3) – concerns include (a) inadequate size resulting in damage to post-16 education and (b) lack of details;
- Increased traffic (2);
- Demolition of Fairfield Campus Building (2);
- Provision of an art gallery (money should be spent on refurbishing Fairfield Halls) (1); and

- Provision of 'luxury' flats (1).

### **Supporting comments**

- Many of those objecting to the closure of Fairfield Halls explicitly support refurbishment in principle.

6.31 The following issues were raised in representations, but they are not material to the determination of the application:

Closure of Fairfield Halls. [OFFICER COMMENT: A large number of objections to the application relate to the closure of Fairfield Halls. The temporary closure of Fairfield Halls is not a material planning consideration. 'Closure' of a building does not constitute development that requires planning permission].

Demolition of Fairfield Halls [OFFICER COMMENT: Approximately 63 objections mistakenly believed that it was proposed to demolish Fairfield Halls].

6.32 The following procedural issues were raised in representations:

- Concern about a conflict of interest due to the Council being both the promoter of the scheme and the planning authority (OFFICER COMMENT: The Applicant being LB Croydon has no bearing on how the LPA considers planning merits and/or engages. There is therefore no conflict of interest with the LPA operating independent from the applicant (as it does in any other circumstance). Furthermore, in this particular instance, the LPA has employed an independent planning consultant to act as case officer (working closely alongside the Head of Development Management) to help ensure that no conflicts of interest arise.

## **7 MATERIAL PLANNING CONSIDERATIONS**

7.1 The main planning issues that the Planning Committee are required to consider are as follows:

1. Acceptability of proposed land uses;
2. Housing Mix & Quality
3. Affordable Housing;
4. Education and health services
5. Design and Townscape;
6. Effects on Heritage Assets;
7. Access, movement and parking;
8. Amenities of adjoining occupiers;
9. Environment and sustainability;
10. Relationship with approved schemes; and
11. Other matters.

### **Acceptability of proposed uses**

#### General

7.2 London Plan Policy 2.13 identifies the centre of Croydon and its immediate surroundings as an Opportunity Area; an area which is capable of accommodating large scale development including significant amounts of employment and new

housing. Annex 1 to the London Plan sets indicative employment capacity of the Croydon Opportunity Area (COA) of 7,500 jobs and at least 7,300 new homes up to 2036. London Plan Policy 2.16 identifies Croydon as a Strategic Outer London Development Centre for offices and higher education.

- 7.3 Croydon Local Plan Strategic Policies (CLP1) Policy SP1.2 states that the COA will be the primary location for growth and Policy SP3.8 promotes and supports the development of all B1 uses, retail, leisure, visitor accommodation and housing and community facilities within the CMC. Policy CP3.9 makes clear that CMC will remain the principal location in the borough for office, retail, cultural and hotel activity.
- 7.4 Saved Croydon Replacement Unitary Development Plan (CRUDP) Policy H3 identifies mixed-use sites with a housing element in the CMC, with Sites CMC2/H68 (Fairfield Halls) being allocated for office/leisure/ residential (900 additional homes) and CMC8/H74 (College Road/George Street) being allocated for office/residential (40 additional homes).
- 7.5 The Croydon Local Plan Detailed Policies and Proposals (CLP2) Submission Version (February 2017) proposes the following relevant allocations: Site 31 Croydon College Car Park (mixed-use comprising hotel and housing), Site 182 St. Matthews House (mixed use office/retail/residential), Site 192 Suffolk House and Site 193 101 George Street (mixed use office or residential above retail), Site 245 Mondial House (office and/or residential or offices or hotel and/or retail), Site 247 Norwich Union House (offices with residential or hotel and/or retail) and Croydon College Annexe (residential with community and Creative Industries Enterprise Centre).
- 7.6 The Opportunity Area Planning Framework (OAPF) defines the site as being within the Mid-Croydon and Fair Field zone, which is identified as suitable for civic, community, residential and leisure uses, as well as small scale commercial uses. The adopted Fair Field Masterplan is based on six objectives, including optimising development potential to enable a new mix of uses and ensuring a vital mix of activities giving opportunities for local enterprise.

#### Business (B1) Offices

- 7.7 London Plan Policy 4.2 supports the renewal and modernisation of office stock, with justifying text (4.12) referring to Strategic Outer London Development Centres and the strategic office centre of Croydon as being one of the most viable locations.
- 7.8 CLP1 Policy SP3.13 states that the Council will promote and support the development of new and refurbished office floor space up to 95,000sqm in the Croydon Metropolitan Centre (CMC). The OAPF (4.51) seeks to focus new office space around New Town and East Croydon. However, it goes on to make clear in paragraph 4.52 that it still encourages a flexible approach and that new/converted office space should be permitted in any of the other character areas. The Masterplan envisages offices being part of mixed-use development along George Street. The site is outside of the Office Retention Area that is being brought forward by CLP1.1 Submission Version (January 2017) Policy SP3. This emerging policy does not prevent the development of office space outside of the Retention Area.
- 7.9 The site currently accommodates approximately 16,328sqm of B1 offices spaces. The application scheme provides for B1 use on the ground and upper floors of buildings on Blocks 1, 2 and 3 (George Street frontage and return), with a range of between 30,842

and 96,651sqm being proposed – meaning that there would be a net gain of B1 space of between approximately 14,514sqm and 80,323sqm. The principle of B1 use in this location is in accordance with policy and the proposed net gain in space is welcome as part of a denser mixed-use scheme.

### Retail (A1/A2/A3)

- 7.10 London Plan Policy 2.15 makes clear that town centres should be the focus for commercial development and intensification and identifies Croydon as a Metropolitan Town Centre. London Plan Policy 4.7 states that sites in town centres should be the focus for retail and other commercial uses and that the scale of these uses should be related to the size, role and function of the town centre.
- 7.11 CLP1 Policy SP3.10 provides that a flexible approach will be adopted to retail and leisure within the CMC and explains that this approach is supplemented by the OAPF. Saved CRUDP Policy 2013 SH3 is a borough wide policy that seeks to control retail development outside designated centres across Croydon, including the CMC's Primary Shopping Area (PSA). The CLP2 Submission Version (February 2017) Policy DM5 (further to CLP1 Policy SP3.7) extends the PSA to include that part of the site that is north of College Road (i.e. Blocks 1 and 2 and the northern part of Block 3).
- 7.12 The OAPF sets out specific high street aspirations, including retaining the diverse character and form of George Street to the west of Wellesley Road, improving the streetscape and ensuring that there are day and evening options for eating and leisure for employees and residents travelling to and from East Croydon station. The Masterplan envisages retail as being part of mixed-use development on the four sites along George Street (FF1, FF2 and FF3).
- 7.13 The application proposes flexible A1, A2 and A3 retail floorspace on the ground floor of Building C within Phase 1A and on the ground floor of Blocks 1, 2, 3, 4, 5 and the southern part of 6. All of this floorspace could be used for any combination of the proposed A1/A2/A3 uses. The revisions submitted in December 2016 reduced the amount of proposed retail space from the previously proposed 19,069sqm to 11,306sqm. The Site currently includes 1,820sqm of retail space, meaning that the revised proposals allow for a net increase of up to 9,486sqm.
- 7.14 The Site is outside the adopted PSA and should be considered as 'edge of centre' for the purposes of assessing the application. However, the CLP2 Submission version (February 2017) seeks to extend the PSA to include the area between College Road and George Street (Blocks 1, 2 and the northern part of 3). In accordance with paragraphs 24-27 of the NPPF, a sequential and impact assessment has been submitted to support the proposal. The sequential test concludes that this is the only reasonably available site for the proposed development and that it would not undermine the vitality or viability of existing centres or their future investment prospect and performance.
- 7.15 The proposed retail uses would be acceptable in Building C of Phase 1A and all of the proposed 'Outline' Blocks. Indeed, these uses would help to enliven proposed pedestrian routes throughout the site. The proposed lack of car parking spaces for non-residential uses, reduced public car parking on the Site and proposed development parameters should ensure that the nature of any retail units away from George Street is consistent with retail shopping policy and the character of the proposed

development. It is recommended that planning conditions be imposed to manage hours of uses and appropriate detailed ventilation arrangements.

#### Hotel (C1)

- 7.16 London Plan Policy 4.5 supports visitor infrastructure and seeks to achieve 40,000 net additional hotel rooms by 2036, focussing such accommodation in the Central Activities Zone, town centres and opportunity areas. CLP1 Policy SP3.8 promotes and supports visitor accommodation in the CMC and Saved CRUDP Policy HT1 states that large hotels (of 50+ bedrooms) will only be permitted in CMC.
- 7.17 The application proposes up to 8,342sqm of C1 (Hotel) use on Block 3 (Mondial House). This is similar to the approximate 8,405sqm hotel floorspace (225 beds) that the Council permitted on the College East site (14/01603/P) in December 2015.
- 7.18 A hotel or hotels in this highly accessible location virtually opposite East Croydon Station is in accordance with policy and guidance and is acceptable in principle. It would also be compatible with all of the other proposed uses that are proposed to be included in a building or buildings on this Block. Detailed servicing arrangements would need to be set out at Reserved Matters stage, but officers consider that the proposed Parameter Plans and Design Guidelines allow for acceptable solutions.

#### Non-institutional (D1) and Leisure and Assembly (D2) Uses

- 7.19 London Plan Policy 3.16 states that proposals which would result in a loss of social infrastructure in areas of defined need for the type of infrastructure without realistic proposals for re-provision should be resisted and supports enhanced facilities that help meet need. London Plan Policy 3.17 supports proposals which enhance education and skills provision and makes clear that land already in educational use should be safeguarded and new sites secured to meet additional demands or changes in provision. London Plan Policy 3.18 states that proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand and supports additional provision to meet growing demands. The Mayor of London's Social Infrastructure SPG supports the loss of social infrastructure where this is part of an overall programme for re-provision and responds to the need to rationalise property portfolios across the public estate.
- 7.20 CLP1 Policy SP5.3 states the Council will protect existing community facilities that still serve, or have the ability to serve, the needs of the community. Saved CRUDP Policy CS2 states that development which would lead to the loss of community facilities will not be permitted unless it has been demonstrated that there is no need for them or there are no alternative community uses which could make use of the buildings. The justifying text for this policy makes clear that the Council will need to be satisfied that the potential for alternative community uses have been fully explored before any change of use is accepted. CLP1 Policies SP5.12 and SP13 make clear that the Council will support the growth and improvement of further and higher education in the borough and in particular seek to bring a university or 'multiversity' to Croydon. Saved CRUDP Policy CS1 sets out criteria for new community facilities and notes that CMC is the most appropriate location for major community facilities. The OAPF makes clear that a key part of the vision for the COA is to achieve a new university presence, preferring the concept of a 'multiversity' (whereby a range of further and higher education courses and qualifications is offered, possibly from a number of institutions across the borough and beyond).

7.21 CLP1 Policy SP3.4 supports the retention and on-going development of Fairfield Halls as a performance facility and Policy SP3.8 promotes the development of leisure uses within the CMC.

7.22 Use Class D2 includes cinemas, music and concert halls, gyms and swimming pools. All of these uses would be appropriate in the CMC and would strengthen the offer of this cultural quarter and/or provide residents and occupiers of the new development with opportunities to exercise and stay healthy. Depending on the particular use, D2 uses can constitute a 'community use'.

#### *Phase 1A*

The proposed works to Fairfield Halls include the provision of an additional floor to the existing Arnhem Gallery (D2 space). This Phase also includes the provision of an art gallery and flexible commercial units on the ground floor of Building C (which could be used for either D1 and/or D2 purposes).

#### *Croydon College*

7.23 Croydon College is the largest provider of Further Education and the sole provider of Higher Education within the Borough. It offers the full range of academic and vocational qualifications. It contains the University Centre Croydon, which is based on a strategic partnership with the University of Sussex. It currently operates from the Fairfield Campus building only, with the Annex being vacant since September 2012.

7.24 The Applicant has submitted a 'position statement' from the College. This notes that whilst around 26,000sqm of the Fairfield Campus building has been refurbished over the last 15 years and the College recently received planning permission for the erection of a single storey extension to the western end of the building (15/02686/P), it is an inefficient building with too many small rooms and outdated services provision. The College states that it is committed to remaining in the centre of Croydon and the opportunity to move to new premises would enable its longer term vision of a new Institute of Technology alongside the University Centre Croydon.

#### *Southwark Diocese Chapel*

7.25 The Diocese of Southwark's Croydon Area Mission Team is based at St. Matthew's House. The Team is responsible for serving the Croydon Episcopal Area. The Team's office includes a chapel/large meeting room (211sqm). It is recommended that the replacement of the chapel (as part of any re-provision of space for the Area Mission Team) is secured by a planning obligation.

#### *The Courts*

7.26 This part of the Site is owned by the Ministry of Justice and comprises busy judicial courts. The One Public Estate (OPE) programme is designed to facilitate local authorities to work successfully with Central Government on public property and land issues. It has four main objectives: to create economic growth (including additional housing), generate capital receipts, reduce running costs and deliver more integrated and customer focused services. The Council is fully engaged with the Cabinet Office to bring forward re-location and co-location proposals for the large Central Government estate based in CMC. The Ministry of Justice is part of this programme and is reviewing the need for the Courts and the nearby County Courts at Altyre Road in the context of a wider aligned public estate strategy.



*Other (Blocks 2, 3, 4, 5 and/or 6)*

7.27 The existing gym (D2) in Suffolk House (Block 1) would be lost. However, the proposals allow for up to 11, 842sqm of D2 within Blocks 2, 4 and 5. It is recommended that the provision of an equivalent D2 use in Block 5 is secured by way of a planning obligation.

*Net effect and conclusion*

7.28 The application proposes a significant loss of Non Residential Institution (D1) and Leisure and Assembly (D2) floorspace, as summarised in the Table 3 below.

**Table 3: Existing and proposed D1 and D2 uses**

	Existing	Proposed	Net effect
<b>Phase 1A ('Detailed')</b>			
Fairfield Halls (D2)	19,747	20,689	+ 942
Gallery (D1)	-	2,489	+ 2,489
Building C unit (Assume D1)	-	505	+ 505
Phase 1A total	19,747	23,638	+ 3,936
<b>Phases 1B, 2 &amp; 3 ('Outline')</b>			
Croydon College (D1)		18,658	to -19,464 to
• Fairfield Campus building	40,456	28,566	-29,372
• Barclay Road Annexe (demolished in Phase 1A)	<u>7,574</u> 48,030		
Diocese of Southwark Chapel (D1)	211	211	Neutral
The Courts (D1)	8,943	0	- 8,943
Gym (Suffolk House/Block 1) (D2)	1,284	0	-1,284
Other D2 (Blocks 2, 4 & 5)		1,284 to 11,842	+ 1,284 to +11,842
Other D1 (Blocks 1, 2, 4, 5 and/or 6)		1,097 to 15,172	+1,097 to +15,172
Phases 1B, 2 + 3 total	58,468	21,251 to 55,790	-2,677 to -37,218
<b>Overall total</b>	78,215	44,934 to 79,473	+1,259 to -33,281

7.29 The relevant policy framework focuses on 'facilities' rather than floorspace and officers consider that the key planning issue is around the provision of facilities and services, rather than a pure focus on floorspace, although this is material. To conclude this section of the report:

- The overall proposals would help facilitate the refurbishment and extension of Fairfield Halls in line with CLP1 Policy SP3.4
- The loss of the existing College Annex and Courts buildings would help to deliver the objective of better connections to and through the area, as called for in the Fairfield Masterplan;
- A more efficient College building that delivers an improved College function and meet forecast need, keeps the College in Central Croydon and results in the redevelopment of the existing College buildings for housing and other suitable uses, could have real benefits and help deliver key planning policy objectives;

- Future planning obligations could secure a replacement chapel linked with any re-provision on site of floorspace for the Diocese of Southwark's Croydon Area Mission Team and an equivalent leisure use to mitigate the proposed loss of the existing gym.
- The rationalisation/co-location of Ministry of Justice buildings and the release of unneeded floorspace (whilst maintaining the function) is just the type of scenario that is anticipated by the Mayor of London's Social Infrastructure SPG.

### Employment and Training

7.30 London Plan Policy 4.12 and CLP1 Policies S5.1, SP5.14 and SP5.15 support the provision of skills and training and further education through the use of planning obligations to secure in-kind and financial contributions from developers. The Council's s106/CIL non-statutory guidance note (April 2013) is in the process of being updated. The September 2016 draft guidance makes clear that developers should produce Employment and Skills Plans for the construction and end-use phases of large schemes. These are expected to outline the approach the developer will take to delivering employment, training and apprenticeship outcomes and engagement with schools and education providers – with the aim of securing a minimum of 34% of the total jobs created to be filled by Croydon residents. In addition to preparing Plans, the draft guidance calls for financial contributions based on capital costs for construction and a standard formula for end-use jobs.

7.31 Based on appropriate job to floorspace ratios, the Supplement to the ES Addendum estimates that the proposed development is likely to generate approximately 318 net additional construction jobs per year across the construction phase. The Supplement to the ES Addendum estimates that the proposed minimum non-residential floorspace would provide 481 new Full Time Equivalent (FTE) jobs, whereas the proposed maximum non-residential floorspace would provide 2,808 FTE jobs. However, given the expectation that the amount of housing will be maximised, officers consider that the Illustrative Scheme provides the most likely outcome and this is estimated to be 1,300 new FTE jobs. The ES identifies minor beneficial effects during construction and moderate beneficial effects during operation and officers agree with this assessment. It is recommended that a planning condition secures Employment and Skills Plans for the construction and end-use phases for Phase 1A and that for the Blocks in Phase 1B, 2 and 3, planning obligations secure both Plans and financial contributions in line with adopted policy and guidance at the time that subsequent Reserved Matters applications are determined.

### Housing

7.32 London Plan Policy 3.3 recognises the pressing need for more homes in London and makes clear that boroughs should seek to exceed their minimum housing targets (Croydon's target being 14,348 additional homes between 2015 and 2025). Policies 2.13 and 2.15 make clear that Opportunity Areas and town centres should be the foci for housing delivery and intensification. London Plan Policy 3.4 states that development should optimise housing output for its location in accordance with a density matrix. The Site is within a Central Location with excellent public transport accessibility and the indicative density range for such sites is 650-1100 habitable rooms per hectare (hrh).

7.33 CLP1 Policies SP1.3 and SP1.4 encourage growth in homes, jobs and services in sustainable places. Policy SP2.1 states that the Council will apply a presumption in

favour of development of new homes provided applications meet policy requirements and Policy SP2.2 seeks to deliver a minimum of 20,200 homes between 2011 and 2031. The CLP1.1 Submission Version (January 2017) seeks to secure 31,850 new homes across the Borough and 10,500 in the COA between 2016-36. Saved CRUDP Policy H3 identifies mixed-use sites with a housing element in the CMC, with Sites H68 (Fairfield Halls) being allocated for 900 additional homes and H74 (College Road/George Street) being allocated for an additional 40 homes.

7.34 CLP1 Policy SP2.2b and the OAPF support the development of at least 7,300 homes in the COA. The Masterplan envisages housing being part of mixed-use development on the four sites along George Street (FF1, FF2, FF3 and FF7), the multi-storey car park (FF22) and the Magistrate’s Court (FF23).

7.35 The application proposes 19,814sqm of residential (C3) floorspace in Phase 1A (the ‘Detailed’ element) and between 60,510sqm and 170,876sqm of residential (C3) floorspace in Phases 2 and 3 (the ‘Outline’ element). The Phase 1A proposals are for 218 homes. The number of new homes provided in Phases 2 and 3 would depend on a number of factors including dwelling mix, size of homes and amount of circulation/communal built space, which is not known at this stage. The applicant has used the minimum dwelling space standards and the indicative dwelling mix to generate a minimum number of dwellings in the ‘Outline’ element of the scheme of 777 and a maximum number of 2,209. Added to the 218 dwellings in the ‘Detailed’ element, this results in a minimum of 995 and a maximum of 2,427 new dwellings.

7.36 Key relevant policy and guidance encourages additional housing on parts of the Site, which has excellent public transport accessibility and its character makes it suitable for high density accommodation. It should be noted that the application would result in the loss of existing housing (approx. 401sqm or 6 Market flats) in St. Matthews House on George Street. However, it would result in a very significant net gain in the amount of housing, making this loss acceptable in policy terms.

### Housing Mix and Quality

#### Dwelling mix

7.37 CLP1 Policy SP2.5 seeks to secure the provision of family housing and states that the Council aspiration for 20% of all new homes within the COA having three or more bedrooms and 35% of all two bedroom homes having four bed spaces. The OAPF indicates that developments within the Fair Field zone should aim to provide 20% of units with 3-bedrooms or more.

**Table 4: Phase 1A Residential: Dwelling mix**

	Number	%	Hab rooms
Studio	11	30%	11
1-bed	54		108
2-bed (3-person)	47	64%	420
2-bed (4-person)	93		
3-bed	9	6%	36
4-bed	4		20
	218	100%	595

- 7.38 The application as originally submitted included 22.5% of 3 and 4-bed homes. However, following advice from its financial viability advisors, the Applicant revised the mix such that the proposals now include 6% of family-sized housing. This falls significantly short of policy requirement for at least 20% family-sized homes. However, it should also be noted that 42% of the proposed 2-bed properties would be 4-person homes, which exceeds policy requirement for 35% and this would go some way to mitigate the small number of 3-bed plus homes being proposed.
- 7.39 The Planning Statement Addendum outlines an indicative dwelling mix for the assumed maximum 2,209 dwellings in the 'Outline' element of the proposals. This is outlined in Table 5 below.

**Table 5: Phases 2 & 3 Residential: Indicative Dwelling mix**

	Number	%
Studio	110	5%
1-bed	552	25%
2-bed	1105	50%
3-bed +	442	20%
	2209	100%

- 7.40 To help ensure a mixed and balanced community and comply with the adopted CLP1 Policy SP2.5, it is recommended that planning conditions ensure that the dwelling mix for each of the Blocks that would provide residential dwellings ensure that at least 20% of dwellings in that Block comprise 3-bedrooms or more and that 35% of 2-bedroom properties have 4-bedspaces.

Housing standards and quality

- 7.41 London Plan Policy 3.5 states that new residential units should have minimum floor areas in accordance with set standards. The London Plan Housing SPG provides detailed guidance on housing design and standards.
- 7.42 CLP1 Policies SP4.1 and SP4.2 seek to respect and enhance character to create sustainable communities. CLP1 Policy SP.2 supports the minimum standards in the London Plan Housing SPG. Saved CRUDP Policy UD8 of the Croydon Plan states that external amenity space should be at a level which is commensurate with that provided in the surrounding area.
- 7.43 *Phase 1A*. The proposed homes would be a mixture of single and split level flats with floor to ceiling heights of approximately 2.8m. The proposed homes would meet the London Plan minimum standards in terms of floorspace and private amenity space and would also include sufficient outdoor communal space in the form of the proposed residential courtyard and two communal roof terraces on Block D. Revisions made since the original submission means that there would be no single aspect homes. Lift/stair cores in Building A would serve four flats per floor, whereas cores in Buildings C and D would serve three and two flats respectively and these are comfortably below the maximum of eight flats per core called for in the London Plan Housing SPG. Two lifts per core would be provided for Buildings A and C, whereas one lift per core would be provided for Building D which would be acceptable, given that all proposed above ground wheelchair accessible homes would be served by 2 lifts.

- 7.44 In terms of privacy, the London Plan Housing SPG (2.3.36) refers the former commonly used minimum separation distances between habitable rooms of 18 – 21m, but advocates a more flexible approach to managing privacy. The proposed homes in Buildings B and D that would face each other across the proposed pedestrian street would be between 15 and 16m apart, whereas facing homes in proposed Buildings C and D would be over 30m apart. Officers consider these proposed separation distances to be acceptable.
- 7.45 The ES Addendum and its Supplement include an assessment of daylight and sunlight conditions for the proposed flats and communal square. Revisions made since the original submission result in an improvement in expected internal daylight and sunlight conditions of the new homes. The results indicate that overall 64% of habitable rooms (57% of bedrooms and 77% of living areas) would meet BRE Average Daylight Factor (ADF) guidelines and approximately 50% of relevant habitable rooms would meet the required Annual Probable Sunlight Hours (APSH). Lighting levels vary within the proposed buildings and are better in flats on upper floors – with virtually all proposed homes on Level 7 and above meeting the standards. It should be noted that the BRE Guidelines are not policy but are recognised guidance which is used to determine the acceptability of levels of daylight/ sunlight within development. Paragraph 2.3.29 of the London Plan Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. In view of the urban characteristics of the immediate area and the overall benefits of the scheme, officers are satisfied that these infringements in this particular case are satisfactory.
- 7.46 The BRE guidelines recommend that at least half of a garden or amenity areas should receive at least 2 hours of sunlight on March 21<sup>st</sup>. The Supplement to the ES Addendum reports that around 14% of the proposed Phase 1A courtyard would receive two hours of sun on the 21<sup>st</sup> March. However, up to 77% of the space would receive two hours sun in summer and officers consider that, providing detailed landscape design quality is high, this proposed courtyard spaces are acceptable.
- 7.47 The ES Addendum also includes an assessment of likely internal noise conditions of the proposed homes. This finds that with the implementation of a Construction Environmental Management Plan (CEMP) and Construction Logistics Plan (CLP) there would be no significant effects during the construction phase. It is recommended that planning conditions require CEMPs and CLPs for the various phases of the proposed works and officers are satisfied that these would adequately safeguard the amenities of occupiers of these buildings. The ES also finds that with adequate glazing specification, there should be no likely significant noise effects in the operational phase. It is recommended that planning conditions require approval of glazing specifications and require fixed plant and machinery to be designed to certain standards.
- 7.48 All in all, officers are satisfied that the proposed homes in Phase 1A would be high quality places to live and that they meet policies CLP1 Policy SP.2, Saved CRUDP Policy UD8, London Plan Policy 3.5 and guidance in the London Plan SPG.
- 7.49 *Phase 2 and 3.* The 'Outline' element of the proposals would be the subject of Reserved Matters approval and detailed quality issues would be considered at that stage. However, the LPA needs to be satisfied that, if approved, the proposed Parameter Plans and Design Guidelines would enable acceptable housing to come forward in due course.

- 7.50 The proposed Plans and Guidelines are informed by the Illustrative Scheme which includes indicative building footprints and flat layouts. The proposed Plans are based on an average floor-to-floor height of 3.2m, which allows for the minimum floor to ceiling height of 2.5m called for in the London Plan Housing SPG to be met. The Plans allow for housing at all levels (including ground level) for all Blocks where housing is proposed. They also propose minimum separation distances between Blocks which is generally 16m, although this reduces to 12m between Blocks 1 and 2 and Blocks 4 and 5 across the proposed routes between George Street and College Green. The minimum distance between buildings within Blocks 4, 5 and 6 (where there would be courtyards) is 18m. Officers consider that these minimum distances are reasonable and allow for acceptable relationships between habitable rooms.
- 7.51 The ES Addendum reports on an assessment of the likely internal daylight and sunlight conditions of the proposed homes based on the proposed maximum height parameters. The proposed homes with the worse likely internal daylight and sunlight conditions are the first three floors of accommodation on the southern side of the courtyards in Blocks 4 and 5. These are typically expected to have Vertical Sky Component (VSC) measurements of 5.2% to 25% for floors 1 to 9 (as opposed to Guidelines of 27%) and Annual Probable Sunlight Hours (APSH) of 2.5 to 24% for Levels 1 to 6 (as opposed to Guidelines of 25%). Winter sun levels are not expected to meet the Guidelines of 5% until Level 9. Given this, the ES Addendum also reports on an Average Daylight Factor (ADF) assessment of indicative flats on the first floor of these Blocks. This shows that the proposed living rooms would fall significantly below the criterion of 1.5.
- 7.52 It should be noted that the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that in London VSC values of less than this are often deemed acceptable.
- 7.53 The revised Design Guidelines make clear that the courtyard elevations of Blocks 4 and 5 should maximise daylight and sunlight, especially at lower levels. They call for single aspect homes to be avoided where possible and that measures such as maximising glazing, reflective light shelves, careful balcony design and light-coloured facade materials should be used. It is recommended that applications for approval of Reserved Matters for these Blocks are accompanied by a detailed daylight and sunlight report explaining how design has been optimised to maximise internal daylight and sunlight conditions for homes facing the courtyards.
- 7.54 The Supplement to the ES Addendum reports that the courtyards for Blocks 4 and 5 would receive no sunlight and around 36% of the Block 6 courtyard would receive two hours of sunlight on March 21<sup>st</sup> (as opposed to the guidance target of 50%). However, these spaces would receive some/increased levels of sunlight in the summer months and officers consider that, providing detailed landscape design quality is high, the proposed courtyard spaces are acceptable.
- 7.55 The ES Addendum also includes an assessment of likely internal noise conditions of the proposed homes. This finds that with adequate glazing specification, there should be no likely Significant Observed Adverse Effect Level (SOAL) in either the construction or operational phases. It is recommended that planning conditions are attached to any permission requiring approval of glazing specifications and requiring fixed plant and machinery are designed to certain standards.



## Children's Play

- 7.56 London Plan Policy 3.6 states that new housing should make provision for play and informal recreation for children and young people. According to London Plan Housing SPG standard 1.2.2, this should at least satisfy a benchmark of 10sqm per child.
- 7.57 The Applicant's Play Space Strategy, based on the Illustrative Scheme and using the Mayor of London's child play space calculator, identifies that the scheme would generate 419 children (258 x Under 5, 109 x 5-11 year-olds and 52 x 12+ year-olds).
- 7.58 Phase 1A is expected to generate a total of 22 children (14 x under 5, 5 x 5-11 year-olds and 3 x 12 year olds) and a need for 224sqm of play space. The 'Detailed' proposals for this element include a secure ground level communal courtyard space of approximately 975sqm with a dedicated equipped play space of approximately 180sqm. The courtyard would be within a 60m radius of all of the proposed buildings. Officers consider the proposed doorstep play provision for Phase 1A would more than meet the relevant standards and provide very good children's play opportunities.
- 7.59 For Phases 2 and 3 (the 'Outline' element), the Applicant's Play Strategy identifies the number and age of children that are expected to live in each Block where residential is proposed and the amount of play space required to meet the London Plan SPG's benchmark. Blocks 4, 5 and 6 would have secure ground level communal courtyard spaces that would provide good opportunities for door-step play for under 5's. In addition, the proposed parameters would provide opportunities for roof-top amenity space that would be usable for play.
- 7.60 Block 3 is the only part of the proposed scheme where there is likely to be a shortfall of 'on-site' children's play space. The Block would provide 1,063sqm of potential play space, which amounts to a shortfall of 87sqm. However, the proposed re-configured College Green would provide predominantly green spaces that would provide a mix of playable landscape for younger children and an area for organised games for older children. The Green would be within 200m of Block 3 (excluding the vertical distance down from homes on upper floors) and whilst this is further away than normally expected, officers consider this to be reasonable in a high-density town centre location. In addition to the Green, there would also be opportunities for incidental play in the proposed traffic-free public realm areas.
- 7.61 The Applicant's Strategy also highlights the play opportunities provided for both younger and older children by the Park Hill Recreation Ground (6.07 hectares - approximately 350m from the centre of the Site) and Queen's Gardens (0.91 hectares - approximately 300m from the centre of the Site). All in all, officers consider that the proposed scheme is capable of providing a sufficient amount and type of play space 'on-site' for the likely level of demand, to be confirmed at the Reserved Matters stage and that there are further 'off-site' opportunities nearby to augment this provision.

## Accessible Housing

- 7.62 London Plan Policy 3.8 states that 90% of new housing should be 'accessible and adaptable dwellings' (Building Regulation M4 (2) – akin to the previous 'lifetime homes' standard and that 10% should be 'wheelchair adaptable' or 'wheelchair accessible' or (Building Regulation M4 (3) (a) or (b)).

7.63 In accordance with policy requirements, the detailed Phase 1A proposals would include 22 (10%) 'wheel-chair adaptable' units, which would be served by two lifts. The remainder of the proposed homes would be 'accessible and adaptable dwellings'. The 'Outline' element is capable of incorporating 'wheelchair adaptable' units and it is recommended that planning conditions secure this provision in Phase 1A and ensure that this is replicated in Phases 2 and 3.

### Density

7.64 The proposed residential density of Phase 1A is approximately 340 units per hectare (uph) or 925 habitable rooms per hectare (hrph), having made an allowance for the proposed non-residential space on the ground floor of Block C. This is within the relevant indicative range of 140-405 u/ha (650-1,100hr/ha) set out in London Plan Policy 3.4.

7.65 The parameter-based approach, where different mixes and amounts of uses would be possible, makes it impossible to meaningfully estimate residential density for the minimum and maximum parameters for the 'Outline' element (Phases 2 and 3). However, the Illustrative Scheme (all Phases) would have a density of 495 uph and 1,400 hrph, having made an allowance for the proposed non-residential space which would exceed the indicative range set out in the density matrix in London Plan Policy 3.4. However, exceeding the matrix does not mean that the development is inappropriate for the Site. The Mayor's Housing SPG states that exceptionally, higher densities may be acceptable where these can be clearly and robustly justified by local circumstances. It goes on to state that they must be tested rigorously, taking account of specific aspects of 'liveability' and 'place shaping' as well as concerns over 'place shielding' and that it is particularly important to take account of a proposed development's likely impact in terms of massing, scale and character and that design should be exemplary.

7.66 As discussed above, the proposed mix and quality of proposed housing is generally good and proposed amenity and play space provision meets relevant standards. As discussed later in this report, the proposed scale and massing is considered acceptable and the quality of design for the 'Detailed' element is very high and the Design Guidelines should ensure that this standard is maintained for the 'Outline' phases and the long-term management of public realm areas is to be secured by Access Management and Maintenance Schemes. The likely effects of the proposal on neighbouring residential amenity and the local transport network are also considered acceptable, subject to conditions/obligations. Furthermore, there would be no significant effect on education and health services that could not be mitigated by CIL contributions.

### **Affordable Housing**

7.67 London Plan Policies 3.10-3.13 require the maximum reasonable amount of affordable housing. London Plan Policies 3.8 to 3.13 (consolidated with alterations since 2011) relate to affordable housing. Policy 3.11 states that the Mayor will and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of the Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing.

- 7.68 London Plan Policy 3.12 states: “*The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes (having regard to current and future affordable housing requirements, affordable housing targets, the need to encourage rather than restrain, the need to promote mixed and balanced communities, the size and type of affordable housing needed and the specific circumstances of individual sites)*”.
- 7.69 In November 2016, the Mayor of London published a draft Housing and Viability SPG for consultation purposes. Given its status, the draft SPG should be given relatively little weight. However, it does set out the Mayor of London’s current position on affordable housing, including the proposed ‘threshold approach’, whereby greater scrutiny/viability information is expected for schemes which include less than 35% affordable housing
- 7.70 CLP1 Policy SP2.4 seeks up to 50% affordable housing provision on sites with 10 or more units. Table 4.1 makes specific provision for affordable housing within the COA, requiring a minimum level of affordable housing on all sites. The minimum requirement was set at 15% for the first three years of the Plan. Following review, with effect from the 1st May 2016, a minimum requirement of 50% affordable housing applies to sites within the COA. If 50% cannot be provided due to viability considerations, a viability review mechanism should be put in place to seek to capture further affordable housing provisions at the time of sale.
- 7.71 CLP1.1 Policy SP2.4 Submission Version (January 2017) requires (a) a minimum of 30% affordable housing on site or (b) 15% on site and 15% on a donor site in the COA or neighbouring Place or (d) minimum of 15% on site plus a Review Mechanism (if 30% on site is not viable, construction costs are not in the upper quartile and there is no suitable donor site).

#### Previously approved levels of affordable housing in the Area

- 7.72 The amount and type of affordable housing that has been secured for the approved schemes within the Site can be summarised as follows:
- Former Essex House, 101 George Street (14/01594/P) - 10% on-site provision by unit, all shared-ownership. A “cash in lieu” payment to make the total affordable housing value of the scheme equivalent to 15% by unit and a review mechanism.
  - College East site (14/01603/P) – 11.3% on-site provision by unit, all shared ownership, with a commuted sum taking overall provision to 20% by unit.
  - Mondial House (16/00180/P) – 15% on-site provision by unit (60:40 Affordable Rent: Shared Ownership) and review mechanism.

#### Phase 1 Affordable Housing

- 7.73 Following advice on financial viability, the Applicant’s initial aspiration to deliver 30% of the homes in Phase 1A as ‘affordable’ has been reduced to 15% (18% if counted by habitable rooms). All of these homes would be ‘intermediate’ shared ownership and four (12%) would be built to Building Regulation M4 (3) ‘wheelchair user dwellings’ standard. The affordable homes would be located in Block C. The proposed dwelling mix is set out in Table 6 below. The Applicant, through its development company Brick by Brick, is currently proposing to deliver and manage the affordable housing in this phase.

**Table 6: Phase 1 Residential - Affordable Housing Mix**

	Number	Number & %	Hab rooms
1-bed	2	6%	4
2-bed (3-person)	9	70%	69
2-bed (4-person)	14		
3-bed	8	24%	32
	33	100%	105

### Phases 2 and 3 Affordable Housing

7.74 The Applicant is proposing that a minimum of 15% of homes in each Block where residential accommodation is proposed (Blocks 2 to 6) would be affordable and that this would be subject to an upward only review that would be undertaken at the same time as a Reserved Matters application is submitted for a particular Block. The proposed minimum level is based on 60% Affordable Rent and 40% Intermediate Shared Ownership. Based on the Illustrative Scheme this would provide 331 affordable homes (199 Affordable Rent and 132 Shared Ownership). There is no particular dwelling mix currently proposed for affordable housing.

### Financial Viability and Review Mechanism(s)

7.75 At 15% for Phase 1A and a minimum of 15% for Phases 2 and 3, the proposed amount of affordable housing would be significantly below adopted strategic policy target of 50%, the Mayor of London's proposed threshold level of 35% and the emerging policy requirement of 30%. As such, the Applicant has submitted a Financial Viability Appraisal (FVA). The FVA is based on the Illustrative Scheme (maximum amount of housing and indicative dwelling mix) and sets out a number of assumptions, including a significant financial contribution from the sale of Phase 1A to fund the refurbishment of Fairfield Halls, which would also result in a nil land value. The FVA reports on a number of different scenarios and concludes that the proposed level of affordable housing represents the "maximum reasonable amount" for Phase 1A and Blocks 4 and 5 (Fairfield Campus building) and in a growth scenario, the levels of affordable housing (based on a 60:40 Affordable Rent: Intermediate split) could potentially be higher on Blocks 2, 3 and 6.

7.76 The Applicant's FVA was assessed by independent RICS property consultants on behalf of the LPA. This included a thorough review of assumed build costs, other costs, sales values, house price and building cost inflation, land values and developer profit. The LPA consultants concluded that the proposed 15% (all Shared Ownership) for Phase 1A constitutes the maximum reasonable amount. They also accepted that 15% (60:40 Affordable Rent: Shared Ownership) constituted the maximum reasonable amount for Blocks 4 and 5 and that potentially higher levels could be achievable on Blocks 2, 3 and 6.

7.77 Since the FVA was submitted and independently assessed, the Applicant has received confirmation that it will receive Coast to Capital Local Enterprise Partnership (LEP) funding of £14.2m for the proposed scheme (from 2017-18), including the refurbishment of Fairfield Halls. Initial advice from the LPA's consultants is that this could have implications for the viability of the overall scheme, particularly Phase 1A, and that the proposed additional capital injection may enhance viability and could mean that additional affordable housing may be achievable. However, funding is for a

period of 3 years with the terms and conditions (including when and how it will be made available) as yet unknown and it is not possible at this stage for the LPA to understand all the impacts it may have on scheme viability and affordable housing content. Furthermore, the costs of necessary measures to mitigate adverse impacts on public transport, as identified by TfL and to meet policy objectives in relation to training and employment are greater than anticipated in the Applicant's FVA. It is therefore recommended that the grant of permission is subject to a suitable review of viability prior to commencement of Phase 1A (apart from demolition and other 'Excluded Works') that allows for both the grant and additional costs to be factored in.

- 7.78 Referring to the "outline" element, the Applicant has proposed an upward only review of the amount of affordable housing at the stage that applications are submitted for the approval of Reserved Matters for each Block, so that any additional affordable housing can be provided on-site. Officers recommend that planning obligations secure a further review when more than 90% of proposed market homes are first occupied.

#### Affordability

- 7.79 The London Plan Annual Monitoring Report (July 2016) states that for dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40% of net household income.
- 7.80 In terms of the proposed Shared Ownership housing, the Applicant's FVA is based on the GLA's Income Affordability Thresholds – which currently requires 1 to 3-bed homes to be available to households with a maximum of £90,000 for 3-bed homes.
- 7.81 In terms of Affordable Rent, the Applicant's FVA assumes rental levels in line with the Local Housing Allowance for the Outer South London Borough Rental market.

#### Other Matters

- 7.82 To ensure that the final maximum amount of affordable housing is delivered on-site alongside market housing in both the 'Detailed' Phase 1A and 'Outline' Phases 2 and 3, it is recommended that a planning condition and obligations ensure that no more than 50% of market homes are occupied until all of the affordable housing has been provided. It is also recommended that a permission secures that at least 10% of affordable homes are 'wheelchair user' dwellings and that occupiers of affordable housing have full access to communal open space and play facilities and equitable access to car parking spaces (on the same terms as market housing residents).

#### Conclusion

- 7.83 The proposed financial contribution towards the refurbishment of Fairfield Halls means that less affordable housing is proposed for Phase 1A than would otherwise be the case. The Halls is Croydon's primary cultural venue and their retention and on-going development as a performance facility is supported by CLP1 Policy SP3.4. Officers consider that significant weight can and be given to this and the other regenerative benefits that the scheme would deliver when considering affordable housing matters.
- 7.84 The minimum amount of affordable housing proposed for all phases is broadly equivalent to what has been secured in relation to the three approved schemes within the site (101 George Street, College East and Mondial House). The Applicant has assumed that there would be some growth in the residential market and uplift in values

during the 15 year build-out period and that this might well offset the actual and potential deficit in scheme viability, particularly in relation to Blocks 4 and 5. As such, it is willing to proceed, accepting the risks of changes in market conditions etc. The implications of the recent confirmation that the Council is to receive £14.2m LEP funding for the scheme, including the refurbishment of Fairfield Halls, need to be fully understood and the recommended review mechanism for Phase 1A would allow for this and for any additional affordable housing that may be achievable to be secured. The recommended review mechanism for Phases 2 and 3 would be able to capture any market uplift as a scheme progresses towards completion and secure more than 15% where viability improves.

- 7.85 Whilst it is accepted that the provision of 15% affordable housing does not accord with the adopted or emerging policy framework, as the maximum viable level of affordable housing has been offered (at a policy compliant split for Phases 2 and 3) and subject to future review mechanisms, officers consider that the affordable housing offer is acceptable.

### **Education and Health Services**

- 7.86 London Plan Policy 3.16 makes clear that boroughs should ensure that adequate social infrastructure provision is made to support new development. The Mayor of London's Social Infrastructure SPG makes clear that development should be accompanied by suitable levels of new, appropriate and enhanced social infrastructure if the full social and economic benefits of growth are to be realised
- 7.87 CLP1 Policy SP5.1 requires new development to contribute to the provision of community facilities by way of the Community Infrastructure Levy (CIL) and planning obligations. CLP1 Policy SP5.4 states that the pattern, scale and quality of community and education facilities will be adjusted to meet the evolving needs of the community, improve service provision and support housing and employment growth.
- 7.88 Section 8 of CLP1 refers to the Infrastructure Delivery Plan as being the Council's tool for setting out key locations, sites and infrastructure which are essential for the successful implementation of its strategic policies. The Council's non statutory guidance on planning obligations and CIL (April 2013) and its draft revised guidance (September 2016) sets out the Council's approach to the use of planning obligations.

### *Population increase*

- 7.89 The Supplement to the ES Addendum includes the findings of an assessment of the likely significant socio-economic effects of the proposed development. This estimates that, based on the average Croydon household size of 2.3 (2011 Census), the likely maximum number of residential dwellings of 2,427 would result in an additional 5,582 people. Taking account of the existing 6 flats on the site, the maximum net increase in population is likely to be 5,568. It should be noted that population would increase gradually as new housing is built over a 15 year period. The ES Addendum also estimates the number of children that would be expected to live in the new housing, concluding that this is likely to be 420 over a 15 year period (162 of statutory school age).

### *School places*

- 7.90 The Council's Pupil Place Planning Team is satisfied that the anticipated Primary child yield from Phase 1A would be adequately absorbed by the existing school network. The Council has an approved Education Estates Strategy programme for delivering additional primary school places for the next three years and is developing plans to meet the expected demand for 4 Forms of Entry (120 spaces) by 20123/24. To help meet this demand, the CLP2 Submission Version (February 2017) allocates seven sites for new primary schools. This includes the Stephenson House site (Cherry Orchard Road) which is within 500m of the Site and the Lidl/Easy Gym site (99-101 London Road) which is within 800m of the Site. The Council will continue to develop plans to meet expected demand going beyond 2023, or sooner if there are any other material changes in the population before then.
- 7.91 The Council's Pupil Place Planning Team is satisfied that the anticipated Secondary child yield from Phase 1A would be adequately absorbed by the existing school network. The Council's Infrastructure Delivery Plan finds that taking account of planned provision, a further 24 x secondary schools Forms of Entry (720 spaces) are required between by 2023/24. To help meet this demand, the CLP2 Submission Version (February 2017) allocate five sites to include secondary schools. All of these would be accessible for secondary school aged children living on the application site and the proposed Heath Clark site (Stafford Road) would be within 1km. As with Primary school places, the Council will continue to develop plans to meet expected demand going beyond 2023, or sooner if necessary.
- 7.92 The proposed development is estimated to generate overall Croydon CIL payments of around £7,410,000 based on the Illustrative Scheme. A proportion of payments are expected to be pooled with other receipts to help deliver the school places needed.

### *Health facilities*

- 7.93 There are currently two GP surgeries within 500m of the application site. Based on the Healthy Urban Development Unit (HUDU) guidance of 1,800 patients per doctor, the ES Addendum identifies the need for an additional 3.1 GPs. The Council is working with the NHS Clinical Commissioning Group (CCG) to meet demand for additional GP surgeries in the wider COA. The CLP2 Submission Version (January 2017) allocates 12 sites in the COA to include NHS health facilities as part of mixed-use redevelopment. Close joint working with the CCG and these proposed allocations should help ensure that there are sufficient GP facilities in the COA to satisfy demand from expected growth. As with school places, Croydon CIL payments are expected to be used to help deliver additional primary health facilities.
- 7.94 Notwithstanding what is said above, given the potential significant net loss of D1 floorspace that would result from these proposals and to encourage the location of a health facility at the heart of the proposed scheme, it is recommended that a planning condition requires the marketing of the proposed non-residential floorspace in Building C (Phase 1A) as an NHS health facility first, before it is allowed to be used for alternative permitted uses.

### *Phases 2 and 3*

- 7.95 The application seeks permission for up to 15,172sqm of new D1 space within Phases 2 and 3. To allow the LPA to take account of circumstances at that time, it is



recommended that a subsequent S.106 Agreement (to be secured by condition) ensures that the first application for approval of Reserved Matters for the redevelopment of any particular Block is accompanied by an Education and Health Strategy. This would set out the developer's proposed Strategy for meeting identified needs for school and healthcare facilities for the approval of the LPA. Developers of subsequent Blocks would then need to submit an updated Strategy, so that at each stage of the proposed redevelopment the LPA could be assured that there was a satisfactory on or off-site solution to meeting the demands generated by detailed redevelopment proposals.

## **Design and Townscape**

### Overall layout, scale and massing and design

- 7.96 London Plan Policies 7.4 and 7.6 state that new development should be complementary to the established local character. Policy 7.5 states that development should make the public realm comprehensible at a human scale and help people find their way and Policy 7.7 states that proposals for large or tall buildings should meet a number of specified criteria
- 7.97 CLP1 Policy SP4.1 states that developments should be of a high quality which respects and enhances local character and Saved CRUDP Policies UD2 and UD3 require development to be of a high quality and visually appropriate design which respects the existing development pattern.
- 7.98 CLP1 Policy SP4.5 supports high quality high density development in the COA that is tailored to and helps to protect or establish local identity. Policy SP4.5 encourages proposals for tall buildings in the COA, with Policy SP4.6 setting out criteria for localities that are sensitive to them. Policy SP4.1 and Saved CRUDP Policy UD11 seeks to ensure that development does not have an adverse impact on designated panoramas, local views and landmarks. It should be noted that the CLP1.1 and CLP2 Submission Versions (February 2017) identify additional local views and landmarks.
- 7.99 The OAPF identifies six key principles to improve the COA's public realm network, including creating a permeable core by breaking down large urban blocks and creating a network of high quality routes and public spaces. It identifies the Site as falling within an 'edge area' where building heights will vary, with scope for some new tall buildings where justified and more mid-rise and infill buildings.
- 7.100 The Fairfield Masterplan identifies three key routes to make the public realm inclusive to all users and to reinforce the grid of pedestrian movement across the Site. These are a links from East Croydon Station to College Green; from Barclay Road to College Green and from Hazeldean Road to College Green. The Masterplan provides specific guidance on scale and massing and design for each of the identified sub-areas.

### *Proposed Planning Parameters and Design Guidelines*

- 7.101 Whilst there are detailed proposals for Phase 1A, the 'Outline' element of the application seeks permission to develop certain uses and an amount of development based on a range of Parameter Plans and Design Guidelines. It is recommended that these documents and plans are 'bound in' to any permission to provide an approved framework for detailed design and the submission of applications for approval of Reserved Matters for the 'Outline' Blocks.

7.102 The Parameter Plans, which need to be read together to understand what would be permitted on any one part of the site, would establish absolute 'rules' for the following:

- What buildings could be demolished and how much excavation could be carried out at basement level;
- Pedestrian, cycle and vehicular access and circulation at ground level;
- Minimum and maximum building footprints (at ground, 'mid-rise' and 'above mid-rise' levels);
- Minimum and maximum building heights (expressed as metres Above Ordnance Datum);
- Minimum and maximum areas of public realm and open space
- 'Active frontages' at ground level (minimums of 20%, 40% and 75%); and
- Land uses at basement, ground, 'mid-rise', 'above mid-rise' and roof level;

7.103 The Design Guidelines comprise a set of illustrated design principles and requirements to guide the detailed design of buildings and spaces within the confines of the above Parameters. They start with a series of overarching strategic design principles that would apply to the whole 'Outline' element. They then go on to provide guidance on Streets in terms of massing, active frontages, facade treatment, datum lines and public routes. Finally, guidance is provided for each of the 'outline' Blocks in terms of massing, building hierarchy, uses, public routes, access/thresholds, vehicle and cycle parking, facing materials and roofs.

7.104 The proposed Parameters and Guidelines are referred to below, where relevant, as part of assessing the proposed scheme. Officers have helped shape these documents and have secured a number of revisions to them. They are now considered to provide a good and acceptable framework for future detailed design.

#### *Proposed overall layout*

7.105 The overall proposals ('Detailed' and 'Outline' elements) comprise the following key elements, which would be delivered incrementally over time:

- Refurbished and extended Fairfield Halls, with improved public realm;
- Re-proportioned College Green, with active frontages around;
- Retention of College Road as a vehicular street serving blocks either side;
- North-south pedestrian street between George Street and Barclay Road (Station Link North and Station Link South);
- North-south pedestrian street between George Street and College Green (St. Matthews Walk) and on to Barclay Road;
- East-west pedestrian route (Hazeldean Walk) between Park Lane and a pedestrian/cycle Hazeldean Bridge over the railway;
- As series of linear and courtyard blocks that provide active frontages to and entrances from the above streets and communal amenity space for residents and a new College building on a split site, either side of a proposed pedestrian route between College Green and Barclay Road.

7.106 The proposed overall layout of the Site would provide high quality streets and spaces that would deliver the key pedestrian links called for by the Fairfield Masterplan and the key principles set out in the OAPF. The demolition of the Fairfield Campus locally listed building, not envisaged by the Masterplan, would provide an additional pedestrian link between George Street and a reconfigured College Green. Officers

consider that the proposed Parameter Plans would ensure that the 'Outline' streets have suitable widths (between 12 and 16m) and have a satisfactory proportion of active frontages to ensure that they are attractive and safe. The proposed Parameter Plans would also ensure that proposed 'Outline' Blocks would have clear 'fronts' and 'backs' and have a good relationship with existing streets (George Street, College Road, Park Lane and Barclay Road) and the railway along the eastern edge. The proposed Design Guidelines would also provide appropriate guidance on the detailed design of building frontages.

#### *Step-free route between George Street and Phase 1A*

7.107 The Applicant has submitted a drawing of a possible temporary walkway for indicative purposes only. Officers accept that a walkway is not the only way in which a step-free route could be provided during Phase 1A and reliance on the existing ramp down to basement level and the proposed publicly accessible lift up to the proposed podium level may be an acceptable alternative (subject to ensuring that this would provide a sufficiently welcoming and safe route). It is recommended that a planning condition be imposed to ensure that no part of Phase 1A is occupied/brought in to use until such times as approved arrangements for providing step-free pedestrian access between George Street and the College Green podium (between Blocks 2 and 5 and Block 3) have been implemented.

#### *Interim boundary conditions*

7.108 The proposed phasing of the development means that detailed interim boundary treatments would need to be provided. These include the surface level boundary between the Phase 1A residential site and Block 6 (The Courts) the surface and basement level boundaries between Phase 1A residential site and Block 7 (The proposed replacement College site) and Block 7 and College Green, Hazeldean Walk and Fairfield Walk. These could be in place for a number of years. It is recommended that satisfactory interim boundary conditions are secured by planning condition.

#### *Proposed building scale and massing*

7.109 The 'Detailed' elements of the proposals are discussed below. The proposed Parameter Plans would allow for the following on the 'Outline' Blocks:

- Block 1 (Suffolk House): single building between George Street and College Road of 17m-34m (4 to 9-storeys) at the lowest to 24m-42m (6 to 11-storeys) at the highest;
- Block 2 (Norwich Union House, St. Matthews House and 101 George Street): single building between George Street and College Road of 14.5m-31.5m (4 to 9-storeys) at the lowest to 21.5m-39.5m (7 to 12 storeys) at the highest, with a taller element on the south-east corner of between 21.5m-64m (7 to 16-storeys);
- Block 3 (Mondial House): three towers extending from a lower 'plinth'. The plinth would be 23.5m-33m (7 to 11-storeys). The tallest tower at the George Street end of the Block would be 98.5m-110m (30 to 35-storeys), with the two other towers stepping down in height in a southerly direction to 76.5m-87m (23 to 27 storeys) and 61.5m-66m (19 to 20-storeys);
- Blocks 4 and 5 (Fairfield Campus Building): two courtyard buildings of 16.5m-34m (5 to 10 storeys) at the lowest and 23.5m-40m (7 to 12-storeys) at the highest;
- Block 6 (The Courts): Crescent-shaped and linear buildings ranging between 6m-18.5m (2 to 6 storeys) at the lowest to 9.5m-25m (3 to 8-storeys) at the highest.

- Block 7 (D1-use buildings) two linked buildings for a replacement College, the eastern building would be 15.5m (4 storeys) at the lowest to 24m-27m (6 to 7-storeys) at the highest. The western building, developed above the Fairfield Halls service yard would be 4m-9m (1 to 2 storeys) at the lowest and 22.5m-30m (5 to 9-storeys) at the highest.

7.110 Officers consider that the proposed scale and massing is acceptable. The proposed very tall buildings would be clustered around the north-east corner of the Site (where tall buildings have already been approved) and the proposed scale around the Site's edges would generally respond well to the character of the surrounding area. In addition, the proposed scale would provide for a high quality reconfigured College Green and other public realm areas and would generally provide for a high quality residential environment (as discussed under Housing mix and quality'). Revisions to the proposed Parameter Plans and Design Guidance improve the proposed relationship between Block 7 and Fairfield Halls and officers now consider this to be acceptable.

#### *Townscape and Visual Assessment*

7.111 Officers considered that the Townscape and Visual Assessment that was reported in the original ES was inadequate and requested a fuller assessment, including Accurate Visual Representations (AVRs). The ES/DAS Supplement (December 2016) includes AVRs from 26 viewpoints agreed with officers. These include the relevant Protect Local Designated Views, Croydon Panoramas, the setting of Landmarks and other important vistas and skylines identified in the Borough Character Appraisal and referred to in CLP1 Policy SP4.2 and those proposed in CLP2 (Submission Version) (February 2017) Policy DM18. The AVRs also support the Applicant's Heritage Assessment which is discussed in detail below.

7.112 In terms of townscape, the ES Addendum reports on an assessment of the likely significant effects on nine 'Townscape Character Areas', which are based on the Borough Character Appraisal and the Croydon Conservation Area Appraisals. These are Addiscombe Road, Chatsworth Road Conservation Area, College Green, East Croydon Station, George Street, Katharine Street, Park Hill, Park Hill Road and Park Lane. This finds that the College Green would be majorly adversely affected during the construction works (it is actually hoarded off now and unusable) but would benefit from moderate beneficial effects once the proposed reconfigured open space and surrounding development is built. No other significant effects are identified for the other Townscape Character Areas. Officers agree with this assessment.

7.113 In terms of visual amenity, the ES Addendum reports on an assessment of the likely significant effects on 19 identified 'Key Visual Receptors'. These include the users of College Green, Park Hill Park, Queens Gardens and 10 groups of existing and future residents in nearby streets (at Altitude 25, Altyre Road Barclay Road, Chatsworth Road, George Street Fairfield Path, Lebanon Road, Park Lane, Stanhope Road and Whitgift Almshouses). Whilst receptors would see site hoardings, demolition and construction activities, cranes, lighting etc., the Assessment finds that none would be significantly temporarily affected. It does, however, identify permanent moderate beneficial effects for the users of College Green (a reconfigured space and setting), visitors to Fairfield Halls (improved setting) and Queen's Gardens (improved views). Officers agree with this assessment.

7.114 Officers have also given further consideration to the AVRs set out in ES/DAS Supplement (December 2016) and are satisfied that the proposed development would not significantly harm views of the following 'landmarks' that are identified in the Borough Character Appraisal: Altitude 25, Croydon Minster, Croydon Clocktower, Number 1 Croydon and Park Hill Water Tower and referred to in adopted CLP1 Policy SP4.2. They are also satisfied that the proposals would not cause significant harm to the Landmarks and Local Designated views that are being identified in CLP2 Submission Version (February 2017) Policy DM18, namely Croydon Minster and Whitgift Almshouses and views from Roman Way South to north of Croydon Minster, views from Park Hill of CMC and views from Church Street of the Whitgift Almshouses and No 1 Croydon).

#### *Environmental considerations*

7.115 London Plan Policy 7.7 makes clear that tall buildings should not adversely affect their surroundings in terms of microclimate, wind turbulence, overshadowing, aviation and telecommunications interference. CLP1 Policy SP4.5 seeks to minimise the environmental impacts of tall buildings.

7.116 The ES Addendum reports on the findings of an assessment of the likely wind effects of the maximum parameters of the proposed scheme. This found that, subject to the incorporation of a number of measures, including tree planting between Blocks 1 and 4, overhead design features such as canopies and landscaping/screening in relation to Block 3, wind conditions throughout the Site would be safe and suitable in terms of pedestrian comfort for their intended use. It is recommended that these features are secured by planning conditions.

7.117 The ES Addendum includes an assessment of the likely sunlight conditions of the proposed reconfigured College Green (with the proposed buildings on its northern, eastern and southern sides) and finds that 98% of it would receive the recommended two hours of sunlight on the 21<sup>st</sup> March, whereas the BRE Guidelines recommends that at least 50% of open spaces achieve this. Daylight and sunlight and overshadowing issues that relates to proposed housing is addressed above under Housing mix and quality.

7.118 It is recommended that planning conditions are used to secure the installation of appropriate aviation warning lights and the submission and approval of a TV signal mitigation strategy in relation to Block 3.

#### *Design Review*

7.119 The application scheme as originally submitted was the subject of design review in March 2016 by a design panel from Design South East. The Panel was broadly impressed with the proposals and considered that the density, grain, mix of uses and network of streets would be appropriate for this central location. The refurbishment and subsequent re-launch of Fairfield Halls was welcomed and the Panel considered that the right approach was being taken in de-cluttering the building in a way which helped reveal its architectural significance and make it more inviting. The Panel's recommendations are set out below, together with an officer comment.

- Further thought might be given to the hierarchy of public routes, the balance of public and private spaces and what uses face each other across streets. Residential streets would work better if ground floors on both sides were residential.

- COMMENT: The detailed proposals for Phase 1A include residential accommodation on the ground floor of both sides of a north-south street;
- There is strong case for the proposed courtyards to be private – there is a lot of proposed public space to animate and taking out a portion may help the rest. COMMENT: The applicant has revised the submitted Parameter Plans and Design Guidelines to make the proposed residential courtyards (Phase 1A residential and Blocks 4 and 5) private communal spaces and strengthened the proposed hierarchy of pedestrian/cycle routes.
  - The critical problem of highway severance around the Site needs to be addressed and the George Street, Park Lane and Barclay Road need to be ‘humanised.’ COMMENT: Noted – the Council’s Connected Croydon programme for the town centre is doing just this.
  - The Panel thought that proposals for College Green were unimaginative and was not clear how they responded to anticipated movement patterns and cultural uses around its edges and the proposed Gallery beneath it. It raised the prospect of allowing temporary uses to animate the space in the short term and to observe how it is used to inform detailed design. COMMENT: The applicant is not willing to adopt an iterative approach to the design of a reconfigured College Green, although the proposed detailed design has been revised to increase the amount of green space, improve the presence of the Gallery beneath and make these more accessible and usable and to improve the relationship with proposed building edges and uses.
  - A bolder approach should be taken, perhaps by incorporating changes to Park Lane to improve pedestrian access to Queen’s Gardens. COMMENT: Officers consider that the existing surface level crossing and subway provide adequate pedestrian connections between these spaces.
  - The Panel had some doubts about the adaptability of the proposed stepped buildings (within Block 3) and considered that a simpler form might prove more practicable and more likely to be built. COMMENT: Officers consider the proposed stepped approach to be acceptable.
  - The area must feel like a real place and not a permanent building site. Existing buildings, such as the College, should not be demolished until a replacement is consented and the public realm should be flexible enough to accommodate temporary uses. COMMENT: It is recommended that planning conditions prevent the demolition of the locally listed Fairfield Campus building until such times as a contract is let for a replacement Croydon College building (Block 7) and the implementation of an approved ‘Meanwhile Use Strategy’.

7.120 If planning permission is granted, the Council’s recently established Place Review Panel would be able to review and comment on emerging detailed proposals and applications for approval of Reserved Matters for the Blocks in Phases 2 and 3.

#### *Meanwhile Strategy*

7.121 The timing of the development of the different Blocks is complex and unknown. For example, if the Fairfield Campus building is demolished and Block 4 comes forward independently from Block 5, there would be the need to provide a ‘meanwhile public realm treatment’ of part of Block 4 in order to ensure that a full width pedestrian route between George Street and College Green could be delivered, without having to wait for the redevelopment of Block 4. There would also be the need to approve interim boundary conditions. To manage the many potential interface issues, it is recommended that the submission and approval of a Meanwhile Treatment Strategy for a particular Block is secured by condition.

7.122 It is also possible that once Croydon College moves into a new College building in Block 7, the existing Fairfield Campus building could remain vacant until such times as it is redeveloped. It is recommended that, if no contract has been let for its demolition, a planning condition requires a Meanwhile Use Strategy for the existing Campus building to be submitted for approval before a replacement College building (Block 7) is first occupied.

#### Detailed Element - Works to Fairfield Halls

7.123 CLP1 Policy SP3.4 states that the Council will promote the remodelling of the Fairfield Halls for its retention and on-going development as a performance facility. The Halls is a locally listed building and the acceptability of the proposed works in relation to its status as a non-designated heritage asset is addressed below.

#### *Background*

7.124 The Fairfield Halls is a cultural asset synonymous with Croydon and is also of regional importance. The building closed to the public in July 2016 to enable its refurbishment. The application scheme retains the building and proposes a range of refurbishment works and several extensions to ensure that it is fit for purpose and efficient as a regionally significant entertainment venue.

7.125 The Theatres Trust (which is a statutory consultee for such applications) commented on the application as originally submitted, offering general support for the refurbishment of the Halls, but raising concerns over the proposed access and get-in arrangements and the lack of detail about Block 7 and how it would integrate with the Halls. Approximately 366 comments from individuals related to proposals for Fairfield Halls as originally submitted. The Mid Croydon Conservation Advisory Panel also commented on this aspect of the proposed scheme. Most comments were from Croydon residents, but some were from further afield. Most people objected to the (then) planned temporary closure of the Halls, many supported the comments made by the Theatres Trust and some mistakenly believed that it was proposed to demolish the building and objected to that. Other raised specific comments in relation to servicing, unsightly extensions and the feared loss of the Harrison and Harrison organ.

7.126 It should be noted that the temporary closure of Fairfield Halls to facilitate refurbishment works is not a material planning consideration as 'closure' of a building does not constitute development requiring planning permission. In addition, the proposed internal and any like-for-like external repair works do not require planning permission and details of these works are referred to below solely to provide a comprehensive understanding of the proposed refurbishment. Having said this, the Applicant has confirmed that the Harrison and Harrison organ will be retained and has undertaken an internal photographic survey of building.

#### *Theatres Trust review and revisions*

7.127 A Theatres Trust Advisory Review of the proposals by a panel of experienced and independent industry professionals took place in June 2016. This made a number of recommendations on how the Applicant could best achieve its objectives for the Halls and included feedback on the proposed works to the building. Following this and in the light of other comments made by local people, officers and TfL, a number of revisions have been made to the proposals. These are referred to below when summarising the



proposed works. The Trust's comments on the application as revised welcome the revisions made following the Review.

#### *Service areas and get-ins*

- 7.128 Proposed detailed works include the demolition of the kitchen extension and the reconfiguration of the kitchen yard space and entrance and provision of a new substation, all at ground level. Vehicular access to this area would remain via the vehicular ramp leading from Barclay Road to the underground car park (which would be reduced from four to three lanes between Barclay Road and the Fairfield Halls service access and two lanes beyond this).
- 7.129 Further north the existing entrance and lift would be removed and an extension built to provide a new artist entrance, reception and offices at lower ground and ground floor levels. Integrated with this and extending to first floor level would be a new enclosed vehicle lift for HGVs and handling area to provide direct access to the concert hall stage. The existing get-in to the Ashcroft Theatre would be widened to allow an HGV to reverse partly into the backstage area.
- 7.130 The Transport Assessment Addendum clarifies all vehicle turning manoeuvres can be carried out within the service yard and that all vehicles can enter and leave in forward gear. A Service Yard Management Plan (which considers the implications of the lift/no lift scenarios) has been submitted for approval.

#### *College building (Block 7)*

- 7.131 The 'Outline' element of the proposals include the development over the rear service yard of an inverted 'C' shaped building, which together with a potentially linked building to the east (both comprising Block 7) would provide a replacement home for the College. The building would be between 1 and 2-storeys next to the Halls, rising to between 5 and 9-storeys. The proposed Parameter Plans have been revised to clarify that this building would abut Fairfield Halls and the proposed Design Guidelines have been revised to make clear that there would be a minimum 12 metre gap between the central part of the Halls and this building, to provide light to the service yard and views of the rear of the Halls.

#### *Other Extensions*

- 7.132 The 1990s extension to third floor offices and escape stairs to the Arnhem Gallery would be demolished and the original fabric made good to return the south east corner of the building (facing Barclay Road) to its original state. The Arnhem Gallery would be extended at roof level to enable a new multi-functional space.
- 7.133 An extension to the northern elevation would provide additional backstage and storage areas for the Ashcroft Theatre at lower ground and ground levels. The ground floor level would provide café/restaurant floorspace (Class A3) and a foyer to Fairfield Halls. This would provide an active frontage to a reconfigured College Green, new secondary access into Fairfield Halls, much improved circulation and new lifts between the ground floor and basement parking area.

#### *Roofs and facades*

- 7.134 The fly tower above the stage of the Ashcroft Theatre would be extended and a new terrace would be provided on the main section of the Theatre roof, overlooking a

reconfigured College Green. It is also proposed to incorporate an array of photovoltaic panels (PVs) into a new roof for the Arnhem Gallery. The existing flue chimney would be extended and a louvered enclosure added to help facilitate the proposed Energy Centre (discussed further below).

- 7.135 The main entrance doors on to the front forecourt would be replaced with a new transparent and uncluttered façade and the canopy would also be refined, both to reflect the original design. New architectural lighting and banner signage would be provided to enhance the main frontage. The glazing and cladding on all facades would be replaced, refurbished and/or cleaned as necessary.

#### *Forecourt improvements*

- 7.136 The front forecourt area would be improved, with new hard and soft landscaping and revised parking and drop-off arrangements. Following comments from officers and TfL, proposed detailed designs have been revised to confirm that coach spaces would be for drop-off/pick-up and waiting in between but not for general coach parking. In addition, previously proposed benches have been omitted and a large natural stone “carpet” has been added to highlight the entrance to the Halls.

#### *Conclusion on Fairfield Halls*

- 7.137 The proposed refurbishment and extension of the Halls would improve their offer and should make them more viable by ensuring that the building could physically accommodate a wider range of events and capture additional customer spending in improved facilities. Officers welcome the restoration-based approach and consider that the proposed works are of high quality and would lead to significant improvements to this locally listed building and improve its functionality. As such, they comply with CLP1 Policy SP3.4, SP4.1 and Saved CRUDP Policies UD2 and UD3. The proposed Service Yard and Forecourt Management Plans are discussed below under ‘Access, movement and parking’. The proposed effect on the significance of the building as a locally listed building is discussed in detail below under ‘Heritage Assets’ and officers recommend that planning conditions secure public access to the proposed Ashcroft Theatre roof terrace and reserve details of the proposed PVs on an extended Arnhem Gallery.

#### Detailed Element - Phase 1A Residential

- 7.138 The Fairfield Masterplan encourages a mix of townhouses and apartment blocks, with any taller tower elements being located where their shadows have least impact on residential amenity and open space (with the illustrative scheme showing a tall building at the north-east corner of the site). It also encourages access to private car parking below and servicing to be from the north and seeks an appropriate mix of surface level amenity space, play space and semi-public/semi-private space.
- 7.139 The detailed proposals would comprise an 8-storey linear building and a 21-storey tower along the eastern edge of the site, adjacent to the railway line. To the west of these buildings would be a north-south street, which would form part of a pedestrian/cycle route between George Street and Barclay Road as and when the Courts (Block 6) are redeveloped. Further to the west, two residential buildings of part 6/part 8-storeys and part 4/6 and 7-storeys would be developed around the northern, eastern and southern edges of a residential courtyard. The western side of the square would be formed by a new College building of between 6 and 7-storeys.

- 7.140 The proposed ground floor flats in Buildings B and D would have individual entrances off the proposed pedestrian streets. This should maximise street activity and is welcomed. Balconies would overlook both the streets and communal amenity spaces, providing further activity and security. The proposed communal courtyard formed by Buildings C and D would be gated but accessible to residents of all of the proposed buildings. The size of the communal space has been maximised, consistent with private amenity and privacy considerations and would include high quality hard and soft landscaping and plays space. This would be augmented by communal terraces.
- 7.141 The buildings would present large format pre-cast concrete facades to the outward facing elevations, whereas finer articulation and brick detailing are proposed for elevations that address the inward communal spaces. Importantly, the western blank facades of Buildings C and D, that would be exposed pending the development of Block 7 (the replacement College), would be of equally high quality materials. Metal railings/louvers and aluminium/timber composite doors and window frames are proposed. The proposed architectural language for the tower is 'punched' elements and window openings, that would create a patterning of reveal depths that emphasise the substantial concrete nature of the building. This is in contrast to many of the lighter rain screen claddings used on other towers in the COA and is welcome.
- 7.142 The proposed layout, scale and massing generally accords with guidance in the Masterplan and should help provide a high quality and safe residential environment. The proposed architecture and choice of external materials is also considered acceptable and it is recommended that a number of details are reserved by planning condition for subsequent approval. These include details of living roofs, bird and bat boxes in Buildings A and B (next to the green corridor provided by the existing railway embankment), external materials, gates to the courtyard and shop fronts for Building C and 'interim boundary treatment that ensures the creation of a hospitable and secure courtyard space pending the development of Block 7.

#### Detailed Element - College Green

- 7.143 London Plan Policy 7.18 states that the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area and that this is the same type of space (unless assessment demonstrates otherwise). This reflects the NPPF (Para. 74), which makes clear that existing open space should not be built on unless, amongst other things, the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
- 7.144 CLP1 Policy SP7.2 states that the Council will protect and safeguard the borough's local green spaces. Saved CRUDP Policy RO8 designates College Green as Local Open Land (LOL) and states that development on LOL will not be permitted unless it is for outdoor activity or limited extension to existing facilities. However, justifying text to this policy notes that "Some loss of LOL may be allowed if it is offset by the creation of additional open space of equivalent community benefit elsewhere."
- 7.145 CLP2 Policy DM27 (Submission Version) (February 2017) proposes to designate College Green as 'Local Green Space'. The emerging policy makes clear that the intention is to apply the same level of protection afforded to Metropolitan Green Belt to 'Local Green Spaces. However, this emerging policy has only limited weight.
- 7.146 The Fairfield Masterplan considers the College Green as three sub-areas: Park Lane Square (FF14), College Green West (FF15) and College Green East (FF16). In doing

so it makes clear that the existing 'green' space should be maintained and enhanced, both in terms of quantity and quality within the overall scheme and (in summary) encourages the creation of:

- A new walkway across the entire south face of Croydon College (FF13).
- A multi-functional green open space near Park Lane (FF14) between Fairfield Halls and Croydon College;
- A central gathering space (FF15) as a formal entrance to the College, capable of accommodating temporary art installations, markets and performances; and
- Communal space for adjacent residential development (FF16).

7.147 *Quantitative issues.* The existing College Green LOL comprises 5,750sqm. The application scheme includes developing parts of the existing Green to accommodate extensions to the north side of Fairfield Halls, a replacement College building and the Phase 1A residential scheme. The proposal is to reconfigure the existing Green to compensate for the losses that would result from these developments by extending the Green to (a) the north, once the Fairfield Campus building is demolished (effectively making use of space which is currently a void between the basement car park and the building), (b) to the west towards Park Lane and (c) to the south to Barclay Road, between the proposed new College buildings and proposed new housing, with this part of the space also providing a pedestrian/cycle route.

7.148 The reconfiguration of the Green would take place in the following broad phases:

- Phase 1A would involve the demolition of a large part of the existing podium upon which the Green sits and the extension of Fairfield Halls on part of the existing Green. It should be noted that given the major physical works to the podium structure, there would be a temporary period when the Local Open Land is not there/out of use. The applicant anticipates that this would be for between 1.5 and 2 years;
- Following Phase 1A, the Green would be extended westwards towards Park Lane and then southwards towards Barclay Road, between the two College buildings (with the proposed bridge link running above). This would result in a Green comprising approximately 5,760sqm (a net gain of approximately 10sqm); and
- Following the redevelopment of Blocks 4 and 5 (Fairfield Campus building), the Green would be extended northwards and comprise approximately 6,260sqm (a net gain of approximately 510sqm) (or 6,180sqm, a net gain of 430sqm, if the space under a link between buildings is excluded from the calculations).

7.149 *Qualitative issues.* The detailed landscape proposals have been revised since being originally submitted to improve functionality and accessibility for disabled people. They provide for three partly raised green spaces that include trees, raised light wells for the proposed Gallery below and natural stone seating. Wild cherry trees would be planted on green spaces. These spaces would be crossed by north-south pedestrian routes and are surrounded on three sides by areas of hard public realm that would connect with Fairfield Halls, the proposed new College buildings and future development of the existing College building (Blocks 4 and 5). Sculptural lighting is proposed along the Park Lane frontage. College Green would have a role in the Applicant's play strategy (discussed below) and the proposals include level changes and steps suitable for imaginative play and a grassed area that is suitable for organised games.

7.150 *Assessment.* College Green is currently an underused resource that is in need of improvement. The scope of proposed Phase 1A works means that its temporary loss is unavoidable. The Design Review suggested that it may be best to defer preparing detailed designs for College Green until such times as a new operator of Fairfield Halls has been appointed and allow use of a temporary space to inform detailed design. However, officers consider that the need for certainty at this stage over function, loadings and design (the podium on which it sits needs to be largely rebuilt) and costs justifies the proposed detailed approach. The proposed long-term layout of the Green is broadly consistent with guidance in the Fairfield Masterplan and in the longer term, would result in a minor increase in its size. It would also improve access to and within the Green, help facilitate development (including the proposed Gallery, extension to Fairfield Halls and improved access to basement car parking) and help deliver a key north/south pedestrian route between George Street and Barclay Road. Officers consider that the proposed detailed design is sufficiently high quality and would be a significant improvement on existing and subject to a planning condition requiring approval of materials and other details, would meet London Plan Policy 7.18, CLP1 Policy SP7.2, saved CRUDP Policy RO8 and guidance in the Fairfield Masterplan (to the extent that it is relevant).

#### Other Public Realm and Landscaping

7.151 London Plan Policy 7.5 states that development should make the public realm comprehensible at a human scale and help people find their way. London Plan Policy 7.19 calls for development to protect and make a positive contribution towards biodiversity and Policy 7.21 seeks to protect existing trees of value, with any loss being replaced following the principle of 'right place, right tree.'

7.152 CLP1 Policies SP4.7 and SP4.8 seek to improve areas of public realm and respect and to create local character and distinctiveness. Saved CRUDP Policy UD14 states that landscape should be an intrinsic part of the overall design concept and Policy NC4 states that the loss of trees of value should only be accepted where a development will bring significant regenerative benefits.

7.153 The Masterplan sets out detailed guidance in relation to a public realm palette of materials, lighting, landscape, wayfinding and biodiversity. It makes clear that Arnhem Gate is to be preserved and celebrated through public realm improvements

#### *Phase 1A - 'Detailed' element*

7.154 The 'Detailed' element of the application includes a detailed landscaping scheme for Phase 1A – with a mixture of York stone paving, artificial stone with granite inlays and 'conservation grade' silver grey pavers along public footways. The tree planting strategy is based the use of Wild Cherry trees at College Green, Ash along Hazeldean Walk, Whitebeam along Fairfield Walk, Rowan along Station Link South, Silver Birch in the residential courtyard and London Plane along Barclay Road. The surface materials and tree planting strategy should reinforce different character areas, with their distinctive colours, sights and fragrance. However, the proposed fairly extensive use of York Stone raises some concerns about on-going maintenance and officers recommend that a planning condition reserves surface materials for subsequent approval. The proposed additional tree planting would also help improve the biodiversity of the area in accordance with London Plan Policy 7.19 and CLP1 Policy SP7. Proposals also include sculptural lighting features and up-lighters for some existing trees, including to the front of Fairfield Halls, benches and sculptural seating.

### *Phases 2 and 3 – ‘Outline’ element*

- 7.155 The Parameter Plans and Design Guidelines set out a framework for public realm and landscaping works in the ‘Outline’ Blocks and spaces, based on a continuation of the above principles. Details would be determined at the Reserved Matters stage.
- 7.156 The application is supported by the Fair Field Tree Survey (February 2016). This reports on the health and amenity value of the existing 50 individual trees and five groups of trees. The proposals would result in the loss of some 37 existing individual trees and two existing groups of trees. Although this includes a number of attractive and healthy trees, officers are satisfied that the overall merits of the proposed scheme justify this and the loss would be mitigated by a significant amount of new planting, which would result in a net gain of trees. Officers recommend that planning conditions to require that any trees to be retained should be safeguarded during demolition and construction works.
- 7.157 Officers consider that the detailed landscaping proposals are of a sufficiently high quality and comply with London Plan Policies 7.5, 7.19 and 7.21, CLP Policies SP4.7 and SP4.8 and CRUDP Policies UD14 and NC4. They are also satisfied that the Design Guidelines provide appropriate guidance for Phases 2 and 3. However, it is recommended that planning conditions are imposed to require the approval of some further details (including material samples and lighting) and reserve surface level design/material, signage and other details along Barclay Road and Park Lane frontages to ensure that these are compatible with existing and proposed cycle routes.

### *Arnhem Gate*

- 7.158 The proposed demolition of part of the existing podium in order to provide step-free access across the site would involve the removal of the Arnhem Gate. The Gate was erected to acknowledge links between Croydon and Arnhem forged at the end of World War II and whilst not a designated or locally-listed building, it has some architectural, historical and townscape value. The Applicant has advised that it would be technically challenging to take the Gate apart and re-connect it to a new transfer structure, that it is in poor condition and near the end of its design life and that remedial work would require all the cladding to be removed and the reinforced concrete structure repaired, which may constitute a complete rebuild. Given this, the Applicant proposes to remove the Gate and celebrate a link with Arnhem through incorporating designed feature lighting along the Park Lane frontage. Officers accept that the Gate could not be retained in its current location and agree with the proposed approach. It is recommended that a planning condition secures the completion of a photographic survey of the structure before it is removed.

### *Access, management and maintenance*

- 7.159 The application does not include details of proposed public access or management and maintenance arrangements. It is important to establish unfettered access for pedestrians and cyclists over public realm areas that do not comprise public highway and ensure that there are clear management and maintenance responsibilities. Officers recommend that planning conditions require approval of a Public Realm Access Management and Maintenance Scheme for Phase 1A (including College Green) and that similar schemes are submitted alongside application for approval of Reserved Matters for individual Blocks in Phases 2 and 3.

## *Inclusive Design, Safety and Security*

- 7.160 London Plan Policy 7.1 calls for development to be designed and managed around the concept of 'lifetime neighbourhoods' and Policy 7.2 requires development to meet the highest standard of inclusive and accessible design. Policy 7.3 seeks to ensure that development designs out crime and Policy 7.13 seeks to ensure a secure environment that is resilient against emergencies.
- 7.161 Saved CRUDP Policy UD6 states that the Council will require that issues of safety and security are intrinsic considerations in the detailed design and layout of buildings and spaces around them and Policy UD7 expects development to be designed with ease of access as a prime consideration.
- 7.162 Emerging proposals were presented to the Croydon Mobility Forum at its meeting on 7 October 2015 and the application scheme (before revisions) was presented to the Forum on 23 March 2016. Forum members asked a number of questions relating to access and servicing, cycling facilities, parking for disabled people visiting Fairfield Halls, coach drop-off arrangements and bus stop locations – all of which are addressed in the relevant sections of this report.
- 7.163 As discussed under 'Housing mix and quality', at least 10% of the proposed new homes in all phases are to be 'wheelchair adaptable' and that the remainder are 'accessible and adaptable'. The proposals would significantly improve the accessibility of public realm areas by creating a step-free environment. Revisions have been made to the proposals for College Green and the Phase 1A residential courtyard to ensure that these spaces are accessible. The detailed landscaping proposals include benches as resting places, tactile paving, contrasting coloured inlays for steps, feature lighting which should help with visibility and a range of species which would provide sensory stimulus through different perfumes.
- 7.164 The Design Guidelines include guidance on creating an accessible and inclusive environment for the 'Outline' element of the proposals (Phases 2 and 3) and the Council would be able to consider detailed proposals for Blocks at the Reserved Matters stage. It is recommended that a planning condition ensures that at least 10% of any hotel rooms that are provided on Block 3 are accessible for wheelchair users, as required by London Plan Policy 4.6.

### **Effects on Heritage Assets**

#### Policy and guidance

- 7.165 Paragraph 129 of the NPPF states that the LPA should assess the particular significance of any heritage asset that may be affected by development. Paragraph 131-2 states that the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and that great weight should be given to their conservation.
- 7.166 Paragraph 134 of the NPPF sets out that where a development proposal would lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 7.167 Paragraph 135 of the NPPF sets out that the effect of an application on the significance of non-designated heritage assets should be taken into account in

determining applications. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

7.168 London Plan Policy 7.8 requires the protection of heritage assets and Policy 7.9 calls for regeneration schemes to identify and make use of heritage assets and reinforce the qualities that make them significant.

7.169 CLP1 Policy SP4.11 states that the Council and its partners will promote the use of heritage assets and local character as a catalyst for regeneration and cohesion and to strengthen the sense of place. CLP1 Policy SP4.12 makes clear that the Council will optimise opportunities to enhance heritage assets, their setting and historic landscape and Policy SP4.13 states that the Council will strengthen the protection of and will promote improvements to heritage assets and their settings. CLP1 Policy SP4.15 makes clear that the Council will promote improvements to the accessibility of heritage assets to allow enjoyment of the historic environment by all.

7.170 Saved CRUDP Policy UC9 states that in considering schemes affecting buildings on the local list, substantial weight will be given to the benefit of protecting and conserving the particular interest that accounts for their designation. Justifying text to this policy makes clear that where demolition is proposed, it should be demonstrated that “all reasonable attempts have been made to retain the building.” The Local List of Buildings SPD (2006) provides guidance on the interpretation of this saved policy.

7.171 Saved CRUDP Policy UC3 makes clear that development will only be permitted if proposals do not (adversely) affect the setting or views in and out of a conservation area. Saved CRUDP Policy UC10 makes clear that the Council will protect and enhance parks and gardens that are either on the national Register of Parks and Gardens of Historic Interest or in the schedule of parks of local interests.

7.172 The Chatsworth Road Conservation Area Appraisal and Management Plan (2013) and Central Croydon Conservation Area Appraisal and Management Plan (2014) include guidance on assessing the impact of proposed development on their setting.

#### Proposed loss of the Fairfield Campus Building

##### *Significance of the building*

7.173 The Fairfield Campus Building was built in two phases between 1953 and 1960. The central rotunda was added in 2007. The Council’s criteria for including a building on its list of ‘Locally Listed Buildings’, which are defined as buildings and structures of local interest, is set out in the justifying text to Saved CRUDP Policy UC9. This states that all locally listed buildings should satisfy at least two of the following criteria: authenticity, architectural significance, historical significance, technical significance and/or townscape value. The Fairfield Campus Building was assessed against these criteria and considered worthy of inclusion on the list. As such, it is a non-designated heritage asset.

7.174 In March 2016, Historic England received a request for the Fairfield Campus building to be added to the statutory list of Buildings of Special Architectural or Historic Interest (i.e. the ‘national list’). In May 2016, the Secretary of State for Culture, Media and Sport decided not to add the building to the List at that time. The Historic England report recommending that this building is not listed noted that whilst



it is of some historic interest for its position within the redevelopment of a civic centre for Croydon following the Second World War, its design is not of special interest and does not meet the criteria for listing. The principal reasons set out in the report for reaching this conclusion are as follows:

- Quality of design: prominent due to its large scale and with some good elements, but with poor massing and little to offset or enliven the long and unremarkable north and south elevations;
- Level of alteration: there have been substantial additions to the building which upset its symmetry and alter key elements of the original form, as well as the immediate setting, where the ground levels, access routes and gardens have been altered;
- Historic interest: post-dating the period in which Atkinson (the architect) designed his best works, it is an incomplete posthumous interpretation of his design and not a good representation of his capabilities.

7.175 The Applicant's Heritage Statement (February 2016) forms an annex to the Environmental Statement. It assesses the significance of the buildings as; 'minor' and officers accept this assessment. Indeed, its 'local' only interest has been confirmed by the Secretary of State's decision not to include it on the statutory 'national' list. The Heritage Assessment Addendum (December 2016) which forms part of the ES Addendum concludes that the proposed loss of the building would have a commensurately minor adverse effect. Officers consider that the harm caused through total loss of a locally listed building can only be considered acceptable if it outweighed by public benefits. This is discussed below.

#### *Existing use and potential alternative uses*

7.176 Croydon College's 'Position Statement' (included in the Applicant's Planning Statement) makes clear that current space in the building is no longer configured appropriately for modern further and higher education delivery with too many small rooms and outdated services provisions. It goes on to say that overall the College estate is too large for its current requirements and that the costs of refurbishment, even if they were affordable, would not resolve the problem of an excess of inflexible space in the buildings. These issues are explained in the applicant's Design and Access Statement (DAS) (updated December 2016).

7.177 The Applicant's DAS sets out options that were considered to establish whether there were any other reasonably feasible alternatives to demolishing the existing building. This included considering various scenarios of partial demolition/partial retention. However, it concludes that none of these would provide the blend of benefits that would be delivered by the proposed scheme. Officers accept this conclusion.

#### *Quality of replacement buildings and spaces*

7.178 The existing building comprises Blocks 4 and 5 of the 'outline' element of the proposals. The proposed parameters allow for two perimeter block buildings with internal private courtyards to be built either side of a public pedestrian route (St. Matthew's Walk) between George Street and College Green. The merits of the proposed replacement buildings and spaces have been discussed in detail above under Design and Townscape. Officers are satisfied that proposed Parameter Plans and Design Guidelines, augmented by the design review process, would ensure high quality buildings and spaces.

*Wider public benefits.*

7.179 The Applicant's Planning Statement (February 2016) has identified the following benefits associated with the loss of this building:

- Creation of a new College building that is fit-for-purpose and fits with the strategic vision of the College;
- Securing the long term viability and future of Fairfield Halls including restoring its heritage and architectural qualities;
- Increasing permeability and connectivity to/from and within the Area
- The delivery of approximately 368 to 1,072 new homes within Blocks 4 and 5
- The introduction of active frontages onto College Green and other routes; and
- Removing the 'moat' along the northern edge of College Green allowing an increase in the amount of Local Open Land as well as improving visual amenity.

7.180 Officers accept that the replacement of the existing building with high quality replacement buildings, spaces and pedestrian/cycle routes would deliver the wider public benefits identified by the Applicant and that a substantial number of these benefits can only be achieved if the locally listed building is demolished. Indeed, additional wider benefits include the provision of a minimum of 15% affordable housing and the delivery of facilities that make a positive contribution towards the regeneration of the COA, including the proposed gallery and potentially other leisure, cultural and alternative community uses.

*Conclusion*

7.181 The NPPF (paragraph 131), which supersedes the advice in the Council's Local List of Buildings SPD, advises that in determining such applications, LPAs should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

7.182 The NPPF also advises (para. 135) that in weighing applications that affect directly or indirectly 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. It states (para. 136) that LPAs should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

7.183 The Mid-Croydon Conservation Area Panel and a number of individuals have objected to the loss of this building. Officers consider that the Applicant has considered all reasonable options to retain the building. Whilst the Council's Fairfield Masterplan does not envisage the loss of this locally listed building, officers consider that its loss would provide opportunities to significantly improve permeability and connectivity through the Site. Furthermore, the proposed Parameters and Design Guidelines (and the use of the Council's design review process) would ensure high quality development that would make a positive contribution to the character and appearance of the Area. Officers also accept that redevelopment would help deliver wider public benefits and,

given this, that the minor adverse effect of the building's loss is sufficiently outweighed by the public benefits of the scheme. As such, officers are satisfied that the proposed loss of this locally listed building is acceptable when considered against London Plan Policies 7.8 and 7.9, CLP1 Policies SP4.12 and 13 and CRUDP Policy UC9.

7.184 It is recommended that planning conditions ensure that no demolition of the Campus building takes place until a contract is let for a replacement building on Block 4 and/or Block 5 and until an external photographic survey of the existing building has been completed. It is also recommended that a planning condition ensures that no part of the Park Lane elevation of the Campus building is demolished until proposals for removing, storing and re-using in buildings/public realm on the site the existing 'Minerva' and 'Vulcan' carved figures has been approved by the LPA.

Proposed works to Fairfield Halls

7.185 Fairfield Halls opened in 1962. Constructed to a high technical specification and strongly influenced by the Royal Festival Hall, the venue was at the forefront of the wave of new venues built during the 1960s. The building has been the subject of a number of insensitive extensions and alterations over the years and is in much need of refurbishment. The building is very important to the built and cultural heritage of Croydon, as evidenced by the number of comments that relate to this element of the application, and is included on the Council's list of 'Locally Listed Buildings'

7.186 The proposed refurbishment works and extensions have been discussed in detail Design and Townscape above. The Applicant's ES/Heritage Assessment concludes that, whilst there would be minor-moderate adverse effects during the construction phase, the proposed works to the building itself and the wider application proposals would improve the character and appearance of the building and improve its setting, resulting in a minor-moderate beneficial effect on this non-designated heritage asset. Officers agree with this assessment and consider that the proposals would protect and conserve the historic interest of the building in accordance with London Plan Policy 7.8, CLP1 Policies SP4.12 and 13 and CRUDP Policy UC9.

7.187 To ensure that the qualities of the existing building are captured, it is recommended that an external photographic survey is secured by way of a planning condition.

Impact on the setting of Heritage Assets and Non-designated Heritage Assets in the surrounding area

7.188 The scale and nature of the proposals mean that they could have an effect on the character and appearance of a number of heritage assets and non-designated heritage assets in the immediate surrounding area and beyond. The applicant's ES/Heritage Assessment (as supplemented) consider the likely significant effects on listed buildings within 1km of the centre of the Area and conservation areas, locally listed buildings and locally listed parks and gardens within 500m. These are identified in Tables 7 to 9 below.

**Table 7: Listed buildings within 1km**

- Hospital of the Holy Trinity (Grade I)	- The Ship PH (High Street) (Grade II)
- Wrencote House (High Street) (Grade II*)	- Nos. 11, 14 & 13A Crown Hill (Grade II)
- Municipal Buildings (Katherine Street) (Grade II)	- The Dog & Bull PH (Surrey Street) (Grade II)

<ul style="list-style-type: none"> <li>- Croydon War Memorial (Katherine Street) (Grade II)</li> <li>- Union Bank Chambers (Katherine Street) (Grade II)</li> <li>- Nat West Bank (Katherine Street) (Grade II)</li> <li>- Segas House (Park Lane) (Grade II)</li> <li>- Electricity Show Rooms (Dingwall Road) (Grade II)</li> <li>- Former Grant's Department Store (High Street) (Grade II)</li> <li>-The Society of Friends Hall (Park Lane) (Grade II)</li> </ul>	<ul style="list-style-type: none"> <li>- Parish Church of St. Michael &amp; All Angels (Poplar Walk) (Grade I)</li> <li>- Parish Church of St John the Baptist (Old Palace Road) (Grade I)</li> <li>- Church of St James (St James Road) (Grade II*)</li> <li>- Church of St. Mary Magdalene (Canning Road) (Grade II*)</li> </ul>
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**Table 8: Conservation Areas within 500m**

Croydon Central Conservation Area	Chatsworth Road Conservation Area
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**Table 9: Locally Listed Buildings and Locally Listed Parks and Gardens within 500m**

<ul style="list-style-type: none"> <li>- Friends Meeting House (Park Lane).</li> <li>- Group 1 - North End (Nos. 1-3, 5-13, 30, 32, 34, 34a, 36, 38, 40, 49, 51, 53 and 55).</li> <li>- Group 2 – George Street (Nos. 3, 3a, 5, 7, 9a, 11a, 11b, 13, 15, 17, 19, 21, 23, 27, 29, 31, 33, 41, 43, 45, 71, 73, 77 and 79).</li> <li>- Group 3 – George Street (Nos. 2 to 34, 42 and 44).</li> <li>- Group 4 – (Nos. 1,4,6,7,8,9,10, 11, 12, 20 to 60, 63, 65, 76, 76a, 78, 78a, 84 &amp; 85 High Street, Nos. 10, 12, 34, 36, 38, 49, 50, 51 &amp; 52 Surrey Street and Nos. 1, 3 &amp; 5 Middle Street).</li> </ul>	<ul style="list-style-type: none"> <li>- Group 5 – Nos. 88-92 (even) Chatsworth Road, No. 4-6 Beech House Road, Nos. 10-12 Woodstock Road and No. 55 Stanhope Road).</li> <li>- Group 6 – NLA Building, Nos. 12-16 Addiscombe Road and No. 17 Landsdowne Road.</li> <li>- Park Hill Recreation Ground (Barclay Road)</li> <li>- The Queen's Gardens (Katherine Street)</li> <li>- Whitgift Almshouses (Hospital of the Holy Trinity)</li> </ul>
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*Listed Buildings*

7.189 The ES identifies adverse temporary effects during the construction phase on a number of buildings due to the presence of cranes, including the Hospital of the Holy Trinity, Municipal Buildings, Segas House and Electricity Show Rooms. In the longer term, the ES (as supplemented) identifies a range of likely effects as discussed below.

7.190 Segas House (Grade II) on Park Lane is the nearest listed building at about 40m away. The proposed development would significantly affect the setting of this building by demolishing the locally listed Fairfield Campus building on the opposite side of Park Lane, reconfiguring College Green and developing larger scale buildings. The ES concludes that this would have a moderate to minor beneficial effect. Officers are not

convinced that the proposed changes in the setting of Segas House could reasonably be considered as beneficial. They are, however, satisfied that the proposals would not significantly adversely affect the setting of this building.

7.191 The Municipal buildings (clock tower, public library etc), Croydon War Memorial, Union Bank Chambers and NatWest Bank comprise a group of listed buildings on Katherine Street and Fell Road. The AVR of View 18 (Katherine Street) shows that the proposed development would have little effect when viewed from the west side of Katherine Street, by the High Street. The proposed development would significantly change the setting of the Town Hall to the north, in a similar way to Segas House, although more distant. The ES identifies a minor-moderate beneficial effect on the Town Hall and a negligible effect on the other buildings. Officers agree that the proposals would have a negligible effect on the wider group of buildings, but are not convinced that the proposed changes in the setting of the Town Hall could reasonably be described as beneficial. They are, however, satisfied that the proposals would not significantly adversely affect the setting of the Town Hall.

7.192 The Hospital of the Holy Trinity Church (Whitgift Hospital) is a Grade I Listed Building. The AVR of View 26 (Almshouses Courtyard) demonstrates that the proposed development would not be visible from within the courtyard. The AVR of View 24 (George Street to NLA Tower) makes clear that the proposed development would be visible along George Street, but the ES finds no significant effect on the setting of this building and officers agree.

7.193 The ES concludes that a combination of the separation distance, disposition of proposed buildings within the application Area, topography and the nature and scale of existing interposing buildings and roads mean that the proposals would either have no effect or a neutral effect on the other identified Listed Buildings. Officers agree with this conclusion. For example, the AVR for View 25 (Junction Street/St Michael Road) demonstrates that the proposed development would not be visible in the background of the Parish Church of St. Michael and All Angels from this view point.

7.194 As such, taking account of relevant guidance in the NPPF, officers are satisfied that the proposed development would not significantly harm the setting of nearby listed buildings and as such would comply with London Plan Policies 7.8 and CLP1 Policies SP4.12 and 13.

#### *Central Croydon Conservation Area*

7.195 The Central Croydon Conservation Area Appraisal and Management Plan (2014) makes clear that development that affects the setting of the conservation area must be carefully assessed to ensure its significance is not harmed, opportunities should be taken to enhance its setting, development affecting the immediate setting must be of an appropriate scale and proposals are to be assessed against (what is now) Historic England's The Setting of Heritage Assets

7.196 The Applicant's assessment is consistent with Historic England's advice. The proposed development would have a partial and localised effect on this conservation area. The most significant effect would be to the setting of the eastern part of the area – firstly around Queen's Gardens, Segas House and the Municipal collection of buildings and secondly at the eastern end of George Street at its junction with Park Lane/Wellesley Road. The proposed demolition of the Fairfield Campus building, reconfiguration of College Green and redevelopment of Blocks 1 and 4 would affect

the setting of the area. However, whilst development of these Blocks would be substantial, the proposed taller buildings would be located at the eastern end of the application site (in Phase 1A and Block 3). The AVRs for Views 14 (Queen's Gardens), 18 (Katherine Street) and 24 (George Street to NLA Tower) are helpful for considering the likely effects on the character and appearance of this Area. The ES concludes that the proposals would have a minor beneficial effect on the setting of this conservation area.

7.197 The Mid-Croydon Conservation Advisory Panel object to the proposals on a number of points, but not specifically because of impact on the conservation area. Officers are not convinced that the proposed changes in the setting of the conservation area could reasonably be considered as beneficial. They are, however, satisfied that the proposals would not significantly adversely affect the setting of the area. As such, taking account of relevant guidance in the NPPF, officers consider that the proposals comply with London Plan Policies 7.8, CLP1 Policies SP4.12 and 13 and Saved CRUDP Policy UC3.

#### *Chatsworth Road Conservation Area*

7.198 The Chatsworth Road Conservation Area Appraisal and Management Plan (2013) makes clear that any proposals for large scale buildings will need to fully consider the impact on the conservation area and that any tall buildings need to consider impact and be of the highest design quality.

7.199 The proposed development would have a partial and localised effect on this conservation area, principally restricted to the northern part of the designated area, along Barclay Road and Chatsworth Road. The proposed development would refurbish Fairfield Halls and remove earlier insensitive alterations. It would also narrow the vehicular ramp and provide a landscaped pedestrian route between Barclay Road and a reconfigured College Green. The existing Courts would be replaced by Block 6. The AVR for Views 20 (Fairfield Path), 21 (Barclay Road) and 23 (Chatsworth Road) are helpful for considering the likely effects on the character and appearance of this Area. They show appropriately scaled development along Barclay Road and the proposed Phase 1A tower and proposed towers on Block 3 being clearly visible down Chatsworth Road. Officers consider that the proposed design of the tower in Phase 1A is of sufficiently high design quality and that the proposed Parameters and Design Guidelines would ensure that proposed towers on Block 3 to be equally high standard.

7.200 Officers do not agree with the Applicant's description of the Courts building as "unattractive", but nevertheless agree with the conclusion in the ES that, given the proposed refurbishment of Fairfield Halls and pedestrian route through to College Green that the proposals would have a minor beneficial effect on the setting of this conservation area. As such, taking account of relevant guidance in the NPPF, officers consider that the proposals comply with London Plan Policies 7.8, CLP1 Policies SP4.12 and 13 and Saved CRUDP Policy UC3.

#### *Locally Listed Buildings*

7.201 The Applicant's assessment groups together individual locally listed buildings in to six geographically similar Groups. It finds that those in Group 1 (North End) and Group 4 (High Street, Surrey Street and Middle Street) are too far away for the proposed development to affect their setting. 71-79 George Street and Norfolk House in Group 2 (George Street North) on the other hand are directly opposite proposed Blocks 1 and

2. Whilst officers do not accept the ES's conclusion of minor beneficial effects, there are already large buildings along this section of George Street and consider that high quality new buildings would not significantly harm the setting of these buildings. Other buildings in Group 2 and Group 3 to the west of Park Lane/Wellesley Road are further away and officers consider that AVR View 24 (George Street to NLA Tower) demonstrates the proposed development would not harm the settings of these buildings.

7.202 Group 5 comprises scattered buildings in Chatsworth Road, Beech House Road, Woodstock Road, Mulgrave Road and Stanhope Road. Their setting includes the late 19<sup>th</sup> and early 20<sup>th</sup> Century houses in the Chatsworth Conservation Area as well as the contrasting scale and material of Fairfield Halls and the Courts building. Whilst officers do not accept the ES's conclusion of minor beneficial effects, for the reasons discussed above in relation to the Chatsworth Road Conservation Area, officers do not consider that the proposals would significantly harm the setting of these locally listed buildings. Finally, Group 6 comprises No. 1 Croydon, East Croydon Station and Landsdowne Road. The Landsdowne Road building is too far away for the proposed development to affect its setting and officers consider that proposed towers on Block 3 would improve the setting of East Croydon Station and would not harm the setting of No 1 Croydon, including the protected view of it along George Street, as demonstrated by AVR View 24 (George Street to NLA Tower).

7.203 As such, taking account of relevant guidance in the NPPF, officers consider that the proposals comply with London Plan Policies 7.8, CLP1 Policies SP4.12 and 13 and Saved CRUDP Policy UC9.

#### *Locally Listed Parks and Gardens*

7.204 There are three Locally Listed Parks and Gardens that could be affected by the proposed development: Queens Gardens, Park Hill Recreation Ground and the Whitgift Almshouses courtyard. In terms of Queen's Gardens, AVR View 14 (Queen's Gardens) shows that the view through the Garden's would be significantly changed and that No.1 Croydon would no longer be visible. However, officers agree with the applicant's assessment that the proposed refurbishment of Fairfield Halls would enhance the setting of the Gardens. In terms of Park Hill Recreation Ground, AVR View 12 (Park Hill) shows that the proposed Phase 1A tower and proposed towers on Block 3 would be clearly visible from the northern part of the Park (and other parts of the development would be in winter months). However, officers agree with the applicant's assessment that as an urban park, the intervisibility with buildings (such as Altitude 25 and St George's House) is an established part of its setting and do not consider that the proposals would significantly harm it. The AVR View 26 (Almshouses Courtyard) demonstrates that the proposed development would not be visible from this space.

7.205 Whilst the proposed development would be visible from Queen's Gardens and Park Hill Recreation Ground, officers do not consider that it would significantly harm their setting or their significance. As such, taking account of relevant guidance in the NPPF, officers consider that the proposals comply with London Plan Policies 7.8, CLP1 Policies SP4.12 and 13 and Saved CRUDP Policy UC10.

## Archaeology

- 7.206 The Site is located within an Archaeological Priority Zone (APZ). London Plan Policy 7.8 requires the protection of heritage assets and archaeology. CLP1 Policy SP4.13 states that the Council will protect and promote improvements to heritage assets and their settings (including APZs). Saved CRUDP Policy UC11 requires an archaeological assessment to accompany an application to develop in an APZ.
- 7.207 The ES reports on a desk based assessment of archaeological significance within the application site. This finds that there is moderate potential for buried remains dating to Roman and early-medieval periods and post-medieval remains relating to the former St. Matthew's Church (a large Victorian church built in 1866 and demolished in 1970) in the northern and southern strips of the site. It concludes that the proposed development would be likely to have minor adverse effects on the former church and undesignated/unknown archaeology.
- 7.208 Comments received from Historic England accept the findings of the ES and recommend that any permission be the subject of a planning condition that requires the implementation of an approved Archaeological Written Scheme. Officers recommend that conditions secure this for both the 'Detailed' and 'Outline' elements of the proposed scheme.

## **Access, Movement and Parking**

### *Access and Movement*

- 7.209 London Plan Policy 6.1 covers the strategic approach to transport across London, including encouraging patterns and nodes of development that reduce the need to travel, especially by car. Policies 6.3 and 6.11 require likely traffic effects to be fully assessed, for traffic flow to be "smoothed and congestion tackled" and Policy 6.14 seeks to improve servicing and deliveries. Policy 6.7 promotes bus and tram networks and Policies 6.9 and 6.10 encourage cycling and walking.
- 7.210 CLP1 Policies SP8.3, SP8.6, SP8.7 and SP8.8 encourage patterns of development that encourage public transport, walking and cycling and improvements to Tramlink. Saved CRUDP Policies T2 and T8 require that development is not permitted if it would result in significant traffic generation which cannot be accommodated on surrounding roads.
- 7.211 The OAPF anticipates a range of measures to facilitate expected growth up to 2031, including additional public transport capacity enhancements, reorganising bus standing arrangements, targeted highway interventions, improvements to walking and cycling and servicing arrangements and travel demand management.

### *Barclay Road Vehicular Access*

- 7.212 Currently the access ramp between the Fairfield Halls Basement Car Park and Barclay Road has four lanes. The application scheme would reduce this ramp to three lanes and also reduce the width of adjoining footways (carriageway reduced from approx. 12.6m to 8.6m and footways reduced from approx. 2.4m and 1.8m to 0.9m and 0.6m). It is proposed that there would be one lane to enter the Fairfield Halls service yards, one lane to enter the car park and one lane to exit the car park. This narrowing reflects the predicted reduction in car trips to and from the proposed reduced public



parking in the Fairfield Basement Car Park during the AM Peak (-54), PM Peak (-30) and Weekend Peak (-38). Before an event at Fairfield Halls, two lanes would allow entry and after an event two lanes would allow exit.

7.213 The proposed revised access arrangements would be implemented in Phase 1A and the resultant narrower width would help enable the creation of a ground level pedestrian route and replacement College Green Local Open Land between College Green and Barclay Road. Given the resultant narrow footways either side of a reduced width carriageway, it is recommended that directional signs, advising pedestrians to exit the basement car park via the Park Lane pedestrian exit, are secured by way of a planning condition. The proposed revised arrangements would continue to enable vehicular access to reconfigured Fairfield Halls servicing yards, which is discussed further below (under Servicing).

#### *College Road Vehicular Access*

7.214 The College Road/Park Lane junction would remain a left-in/left-out priority junction from Park Lane. During Phase 1A, College Road would continue to provide access to the existing Croydon College car park and service yard and the existing Mondial House car park. In addition, the existing access ramp would be used to service the proposed Phase 1A development (including refuse and other service vehicles). During Phase 2, College Road would be reduced in width to reduce the dominance of cars, although refuse and other large vehicles would be able to turn, so that they could enter and leave the street in forward gear. The existing College ramp would be demolished and a new vehicular ramp would be constructed to the east (as part of the development of Block 3). The new ramp would service Phase 1A and also 'Blue basement level Badge' car parking that is expected to be provided for new development in Phase 2. In the event that the approved Mondial House scheme and/or College East scheme were to be implemented, the existing ramp down to the basement would be retained.

#### *Park Lane Vehicular Access*

7.215 The two existing accesses that serve Fairfield Halls forecourt from the gyratory system and Park Lane would be retained and continue to operate as a one-way entry and exit loop. However, the accesses would be improved to safely accommodate coach traffic and would comprise shared surfaces that afford priority to pedestrians and cyclists. The permitted redevelopment of the Whitgift Shopping Centre and adjoining land (LBC Ref 12/02542/P) provides for changes to the Park Lane/Barclay Road gyratory to increase junction capacity and improve pedestrian and cycle facilities. The proposed changes to accesses and works to Fairfield Halls forecourt are consistent with these works.

#### *Pedestrian and cycle routes*

7.216 An existing cycle route (National Cycle Route 232/Connect 2 Route) runs along the northern footway of Barclay Road, across the Fairfield Halls forecourt to the Toucan crossing across Park Lane which needs to be accommodated. Furthermore, the Council is investigating the possibility of extending London Cycle Network Route 23 from Dingwall Road, along the space between Blocks 2 and 3, College Road and the Park Lane frontage to the existing Toucan crossing opposite Fairfield Halls. The detailed landscaping plans submitted for approval for Phase 1 do not explicitly accommodate the existing cycle route along Barclay Road and it is recommended that surfacing and other details are reserved for subsequent approval to make sure that they are compatible with such a route. The

possible extension of Route 23 would take place solely on public highway and Council-owned land. Again, detailed Reserved Matters applications for Blocks 2 and 3 would enable any formal cycle route to be accommodated and it is recommended that the details of Phase 1A along Park Lane are reserved so that they can be reviewed and revised if necessary to accommodate a future route.

7.217 Phase 1A of the proposed development includes the following: :

- The conversion of the existing Hazeldean Road Bridge which currently serves the Hazeldean Road multi-storey car park would be converted in to a pedestrian/cycle only route, including stairs (with a wheel channel) and public lift large enough to take bicycles integrated in to Building A;
- The raised podium area by the existing Arnhem Gate would be reduced in height by approximately 1m to provide level a step-free access through to Park Lane;
- The provision of a step-free route would be provided between College Road and the lowered uniform podium level. The Applicant has submitted an illustrative drawing showing a 1.6m wide walkway along the east side of the existing College ramp, which would maintain vehicular access to the existing Mondial House car park. However, there are other ways in which step-free access could be provided (including the use of the existing ramp and proposed new lift) and it is recommended that a planning condition reserves details of a step-free route for the LPA's subsequent approval and requires an approved solution to be implemented before any homes in Phase 1A are first occupied; and
- The provision of a pedestrian route between College Green and Barclay Road (facilitated partly by the proposed reduction in the width of the vehicular ramp down to the Fairfield Basement Car Park).

7.218 Phase 2 of the proposed development includes the following:

- The provision of a pedestrian/cycle route from George Street through to College Green (facilitated by the loss of the existing College Campus building); and
- The use of the space freed-up by demolishing the existing College ramp to provide a wide and step-free pedestrian and cycle route through to College Road and beyond to George Street. This would also enable improvements to the steps between Hazeldean Road Bridge and the podium, built as part of Phase 1A.

7.219 Phase 3 of the proposed development would include the continuation of the car-free street built between the buildings in the proposed Phase 1A residential development, through the site of the existing Courts building on to Barclay Road.

7.220 The above would represent significant improvements for walking and cycling in accordance with London Plan Policies 6.9 and 6.10 and CLP Policies SP8.3 and 6 to 8. They would also deliver the improved connectivity and permeability called for in the Fairfield Masterplan and (with the demolition of the Fairfield Campus building) provides an additional beneficial route though from George Street to College Green. The detailed proposals for Phase 1A and the proposed Land Use and Active Frontage Plan for the 'Outline' proposals in Phases 2 and 3 should ensure that these routes are attractive and safe to use.

#### *Car parking*

7.221 London Plan Policy 6.13 seeks to restrain car parking provision and includes maximum car parking standards for different uses (although minimum amounts of 'Blue

Badge' spaces are required). CLP1 Policy SP8.16 makes clear that the Council will aim to reduce the overall amount of surplus car parking spaces in the COA in accordance with the OAPF parking strategy and supports the car parking standards in the London Plan. The OAPF sets out two scenarios for off-street public parking. The Council has adopted Scenario 2, which assumes that new major investment is likely and proposes that the overall amount of parking remains broadly as existing at around 7,150, but that it is better located to serve demand.

#### *Public car parking – Phase 1A*

- 7.222 The Site currently accommodates two public car parks. The Hazeldean Road Multi-storey car park (principal access from Hazeldean Road) comprises 792 spaces, although the top six floors were shut in 2012 due to lack of use, reducing the operational capacity to 396 spaces. The Fairfield Basement Car Park (principal access Barclay Road) comprises 605 spaces – giving a total of 1,001 spaces. Both car parks are physically linked and operated by NCP. College Road includes 31 short-term pay and display car parking spaces and 12 motorcycle spaces. The existing operational public parking provision within the Site therefore comprises 1,032 car parking spaces.
- 7.223 The Applicant's TA (as revised) sets out that the proposed 349 public spaces is based on the need to balance support for a successful and viable Fairfield Halls and the aim of encouraging non-car trips to the proposed development. Based on ticketing data supplied by Fairfield Halls, on average, 980 people visit the Halls at the weekend and it is assumed that this may increase by 20% following the improvement works, increasing this number to 1,200. Surveys show that approximately 40% of existing visitors travel by car. The proposed Framework Travel Plan aims to reduce vehicle trips by 10%. This leads to a parking demand generated by Fairfield Halls of approximately 360 (30% of the estimated 1,200 visitors). The proposed basement parking provision of 349 is 11 spaces short of this, but the existing 31 (proposed 30) pay and display parking spaces on College Road would address this. Whilst these currently have a 2 hour parking restriction Monday to Saturday 8am – 6pm, that does mean that visitors to Fairfield Halls could use these spaces, if available, to park at 4pm and stay all evening Monday to Saturday and any time on a Sunday.
- 7.224 The applicant's TA sets out the findings of a parking accumulation survey to establish the use of the existing public car park. This found that currently around 600 spaces are occupied during the week by commuters. Following the proposed reduction in public parking down to 349 spaces, there could be up to 243 commuter parking spaces displaced. It is likely that some of these drivers would change their behaviour and no longer drive. The remaining commuters who choose to continue to drive in to Croydon are likely to be distributed across existing town centre car parks.
- 7.225 The existing multi-storey car park is unattractive and represents an underuse of an accessible site in the COA. The loss of these spaces and the redevelopment of the site for housing and other uses are supported by policy and would give rise to much needed additional housing (including affordable housing) and significant environmental benefits. Officers consider that the number of proposed public car parking spaces would be appropriate and is generally consistent with the Council's current overall off-street public parking strategy for the COA, as outlined in Scenario 2 in the OAPF, taking account of consented schemes elsewhere in the COA. This is to maintain the overall level of public off-street parking in the COA broadly as it was in 2013 (circa 7,150) in the context of significant retail expansion and to better locate it to serve demand.

7.226 The proposed 349 public spaces would operate as a pay-on-foot public car park similar to existing and the proposals include a controlled car park entrance at the bottom of the ramp, with Automatic Number Plate Recognition (ANPR).

*Residential car parking - Phase 1A*

7.227 The proposed 218 new homes would be served by 22 ‘Blue Badge’ parking spaces in the basement, 1 for each of the 22 ‘easily adaptable’ wheelchair accessible homes. Following a comment by TfL, the applicant has confirmed that the proposed ‘blue badge’ residential parking spaces are to be leased rather than sold, to allow flexibility in allocation of these spaces. This is in line with London Plan Policy 6.13 and the London Plan Housing SPG.

*Fairfield Halls car parking – Phase 1A*

7.228 Fairfield Halls currently have 43 spaces within the basement car park allocated for use by staff and artists and there are around 17 additional spaces within the upper service yard (making 60 in total). The application as revised proposes a reduction in spaces to 29 (22 in the basement and 7 in the service yards). This reduced amount is still higher than the maximum London Plan standards, but officers consider this is acceptable given the need for staff and artists to access the building at anti-social hours and given the overall proposed reduction in car parking.

*The Gallery car parking – Phase 1A*

7.229 The proposed Gallery would have 2 ‘Blue Badge’ car parking spaces. This is in line with London Plan Policy 6.13.

*Croydon College car parking – Phase 1B*

7.230 Croydon College currently benefits from 98 car parking spaces in its basement car park. The application proposes a reduction in spaces to a maximum of 30 in the basement of Block 7, with the exact number to be determined at Reserved Matters stage. This reduced amount is still higher than the maximum London Plan standards, but officers consider this is acceptable given the overall proposed reduction in car parking. However, it is recommended that a planning condition requires the cessation of use of the College’s existing car park upon the proposed replacement car parking becoming operational – to avoid the prospect of the College benefitting from both.

*Phases 1A and 1B summary*

7.231 The proposed car parking for Phases 1A and 1B is set out in Table 10 below.

**Table 10: Proposed car parking – Phases 1A and 1B**

	<b>Public Parking</b>	<b>Residential</b>	<b>Fairfield Halls</b>	<b>Gallery</b>	<b>Croydon College</b>	<b>Total</b>
Proposed No. of spaces	349  (22 Blue Badge & 14 potential additional Blue	22  (Blue Badge)	29  (Staff & artists)	2  (Staff & Visitors) (2 Blue Badge))	Up to 30*  (staff)	432

	Badge spaces)		(1 Blue Badge)			
Net effect	- 652	+22	-31	+2	-68	-727

Notes: College parking to be provided in Phase 1B. This does not include parking in College Road.

### *Car Park Management*

7.232 A plan for a reconfigured basement car park has been submitted for approval. In its comments on the application as originally submitted, TfL requested that blue badge parking should provide transfer zones on both sides or that an Access Management Plan is put in place to ensure that spaces are allocated according to need. It also asked that car parking spaces should be leased rather than sold with the proposed residential dwellings to allow for future flexibility in allocation. The detailed design for the basement car park shows transfer zones on one side only. However, this accords with published standards and the recommended planning condition requiring a Car Park Management Plan to be approved by the LPA includes the requirement that this includes details of how disabled spaces will be allocated based on need.

7.233 The recommended planning condition requiring a Car Park Management Plan to be approved by the LPA also includes the requirement to provide details of arrangements for (a) allocating to Croydon College (Block 7) when this building comes forward in Phase 1B, (b) managing the use of the publicly accessible car parking spaces including opening hours, ANPR system and the maximum period that drivers can stay and (c) managing car parking before and after an event at Fairfield Halls, including the operation of the middle contra flow lane between Fairfield Halls and Barclay Road. Subject to this, officers consider that the proposed arrangements are acceptable.

### *Car parking - Phases 2 and 3*

7.234 There are currently three private car parks within the areas covered by Phases 2 and 3 of the proposed development: Croydon College (98 spaces), Mondial House (approx.47 spaces) and The Courts (32 spaces). The Croydon College car park would go out of use upon the proposed replacement car parking in Phase 1B becoming operational and the net reduction of 68 spaces has been accounted for in the Phases 1A and 1B summary above.

7.235 The Applicant proposes that car parking for Phases 2 and 3 would be limited to the provision of 10% residential car parking spaces. The Illustrative Scheme would require 221 'Blue Badge' car parking spaces. Officers consider that this is a reasonable approach that is consistent with policy given the highly accessible location of the Area (PTAL 6b) and the level of public car parking that would be provided in Phase 1A. The likely maximum number of residential dwellings in Phases 2 and 3 is 2,209, resulting in a maximum additional car parking requirement of 221. The loss of the Mondial House and Courts car parking (79 spaces) means that the expected maximum net increase in car parking spaces in Phases 2 and 3 would be 142 and any car parking in these phases would need to be incorporated in to applications for approval of Reserved Matters. This means that, overall; the proposed development would result in a net reduction of 583 car parking spaces.

### *Electric Vehicle Charging Points*

- 7.236 London Plan Policy 6.13 requires 20% active provision of Electric Vehicle Charging Points (EVCP) and 20% passive provision for car parking spaces. The Applicant's TA makes clear that it proposes to provide EVCP and it is recommended that their provision is secured by a planning condition.
- 7.237 In order to manage the proposed 'Blue Badge' only residential car parking scheme and prevent additional parking stress in the adjoining area, it is recommended that for Phase 1A a planning condition is attached to any permission and for Phases 2 and 3 planning obligations are entered in to prevent households (other than disabled people) in new housing from using their address to apply for permits to park cars in Croydon's Central Permit Zone

### *Car Club Spaces*

- 7.238 The proposal is to provide 1 Car Club on College Road in Phase 1A and to increase this number to 4 as Phases 2 and 3 are built out. In response to concerns from officers that this may be too low, the Applicant has proposed that the usage of these spaces be monitored as part of the Travel Plan process and that the number of spaces on College Road is increased up to 10, if monitoring shows additional demand. It is recommended that planning conditions/obligations secure this. It is also recommended that a planning condition and subsequent obligations ensure that each household be given 3 year free membership by an appointed Car Club operator and that the number of spaces is monitored and increased up to 10 if monitoring shows extra demand.

### *Motorcycle parking*

- 7.239 There are currently 12 public motorcycle spaces on College Road. The application as originally submitted proposed 18 spaces in a re-configured basement car park. In its comments on the application as originally submitted, TfL considered that this level of provision was too low. The application has been revised to increase provision to 30 spaces in a reconfigured car park and officers consider this to be acceptable.

### *Cycle Parking*

- 7.240 London Plan Policy 6.9 requires the provision of secure, integrated and accessible cycle parking facilities for long-stay users (staff and residents) and short-stay users (visitors). London Plan Policy 6.13 sets out minimum cycle parking standards in Table 6.3 of 1 space per unit for 1 and 2-bed dwellings and 2 spaces per unit for those with 3 or more bedrooms.
- 7.241 The proposed cycle parking provision for Phase 1A is set out in Table 11 below.

**Table 11: Proposed Cycle Parking: Phase 1A**

	Retail	Residential	Gallery	Fairfield Halls	Total
Long stay cycle parking	2 per unit	371	1	31	405
Short stay cycle parking	16	6	26	84	132

7.242 The proposed development in Phases 1B, 2 and 3 include non-residential land uses which would be operational at different times of the day from the non-residential uses included in Phase 1A. TfL and officers have therefore agreed that short stay cycle parking for Offices (B1) and replacement College (D1) uses could be shared with short-stay cycle parking provision for Fairfield Halls and the gallery, B1 (Office) and D1. The proposed cycle parking provision based on a ‘worse case’ scenario (the Illustrative Scheme plus maximum proposed replacement College) is set out in Table 12 below.

**Table 12: Indicative cycle parking provision: Phases 1B, 2 and 3**

	Offices (B1)	Residential	Chapel	College (D1)	Retail	Other D1	Gym (D2)	Total
Long Stay	378	3,759	1	163	28	1	1	4331
Short Stay		55	2	130	82	11	13	293
Short Stay Shared	20			84				104

7.243 The above level of provision is in general accordance with London Plan Policy and standards, apart from the proposed shared facilities and officers consider that this would be acceptable. However, it is indicative only and the actual number of cycle parking spaces for the ‘Outline’ element of the proposals would be established at the Reserved Matters stage. It is recommended that planning conditions ensure that applications for approval of Reserved Matters for each Block are accompanied by a Parking Management Plan which, amongst other things, includes details of the proposed management/use of long and short stay cycle parking spaces.

*Vehicular trip generation and impact*

7.244 London Plan Policy 6.3 makes clear that impacts on transport capacity and the network must be fully assessed and Croydon Local Plan Policies T2 and T8 make clear that development should not be permitted if it would result in significant traffic generation which cannot be accommodated satisfactorily on surrounding roads.

7.245 Taking account of the proposed significant reduction in car parking spaces within the Site, the Supplement to the TA Addendum predicts a significant decrease in vehicular traffic across all peak periods. Based on the maximum parameter floorspaces for the 'Outline' element (i.e. the worst case scenario), this estimates that there would be an overall reduction in vehicular trips of 226 in the AM Peak (0800 to 9.00), 250 in the PM Peak (17.00 to 18.00) and 99 in the Weekend Peak (14.00 to 15.00).

7.246 The Applicant's TA also estimates a reduction in the amount of vehicular traffic using the existing/proposed modified Barclay Road junction of 54 in the AM Peak (0800 to 9.00), 30 in the PM Peak (17.00 to 18.00) and 38 in the Weekend Peak (14.00 to 15.00). In terms of types of traffic, the applicant's TA identifies a likely increase of 18 HGV movements a day as a result of the proposed scheme, with these additional movements being on College Road. The applicant's ES identifies minor beneficial effects from the overall scheme in relation to highway severance, driver/pedestrian and cyclist delay and fear and intimidation. Officers agree with this assessment.

*Multi-model trip generation and impact and safeguarding public transport*

7.247 London Plan Policy 6.2 seeks to ensure that development safeguards public transport infrastructure and improves the integration, reliability, quality, accessibility and frequency of public transport and Policy 6.4 seeks to improve public transport by amongst other things, enhancing the Tramlink network. Policies 6.9 and 6.10 seek to encourage walking and cycling. Croydon Local Plan Policy SP8 seeks improvements to the tram network and rail and bus infrastructure improvements and seeks to safeguard land for transport infrastructure where necessary.

7.248 TfL made a number of comments on the methodology used by the Applicant for estimating likely trip generation in its original TA. The TA Addendum sought to address these comments and concluded that whilst the proposed scheme would lead to increases in non-car multi-model trips during peak periods, these are unlikely to create a significant transport impact. Following further discussion, revised increased trip generation levels have now been agreed with TfL. These are set out as follows:

- Pedestrian trips (+298/+274 in AM/PM Peaks and + 277 trips in Weekend Peak)
- Cycle (+26/32 in AM/PM Peak and +18 in Weekend Peak)
- Bus (+189/+ 222 in AM/PM Peaks and + 221 trips in Weekend Peak)
- Tram (+246/+ 290 in AM/PM Peaks and + 116 trips in Weekend Peak)
- Rail (Increases in all Peaks, with + 900 trips in the worse case PM Peak)

7.249 As discussed above, the proposed development would result in significant improvements in pedestrian and cycle routes, connectivity and permeability, as well as a significant improvement in the attractiveness of the public realm. Officers consider that this would mitigate the predicted increase in pedestrians and cyclists. Notwithstanding the TA Addendum findings, TfL is concerned that the predicted bus and tram trips would place a significant demand on services in the vicinity of the East Croydon interchange, including a wide range of bus services and infrastructure. As part of the Development Infrastructure Funding Study (DIFS) TfL, working with the Council, has identified a number of bus priority and bus infrastructure schemes which along with additional buses would assist in mitigating the cumulative impact of development within the OA. There is also the need to deliver the proposed Dingwall Loop tram extension.



7.250 Based on the likely trip generation and impacts, TfL has requested financial contributions towards public transport improvements amounting to £3,131,000 (£222,000 for Phase 1A and £2,909,000 for Phases 2 and 3). It is recommended that a planning condition ensures that the Applicant enters in to a legal agreement with or provide an Undertaking to TfL to secure appropriate financial contributions to mitigate additional demand on public transport services arising from Phase 1A prior to the first occupation of any residential dwellings in that Phase. It is further recommended that planning obligations ensure that the Applicant enters in to a legal agreement with or provides an Undertaking to TfL to secure appropriate transport mitigation measures in relation to each Block in Phases 2 and 3 prior to the first occupation of any residential dwellings/non-residential use in that Block. It is expected that financial contributions for Phases 2 and 3 will be broken down to a maximum contribution for each Block, based on the worse case trip generation figures and that there is an appropriate mechanism to reduce the identified 'Block contribution' if detailed proposals set out in applications for Reserved Matters approval for a Block would generate fewer trips.

7.251 London Plan Policy 6.2 and the Mayor's SPG on Land for Industry and Transport seek to safeguard transport schemes, including the upgrading of Tramlink. The Site includes a TfL electricity sub-station and hard standing area that serves Tramlink, which is situated at basement level immediately below the existing Hazeldean Road bridge that serves the multi-storey car park. This is mainly within the 'Detailed' Phase 1A, but part of the hard standing area and the electricity cables that run between George Street and the sub-station are within the 'Outline' element (Blocks 2 and 3). It is recommended that Construction Logistics Plans (to be secured by conditions) safeguard 24 hour vehicular access to the sub-station during demolition and construction works. It is possible that the development of Block 2 could necessitate the relocation of cables that link the sub-station with the tram route on George Street. The development of Block 3 and associated changes to steps between Hazeldean Bridge and a lowered podium would necessitate the re-location of the sub-station/cables linking it with George Street. It is recommended that planning obligations associated with these Blocks requires the re-location of cables/sub-station to be approved before works in these Blocks commence.

7.252 TfL has also commented that it would welcome additional standing space for buses within the Site. The Applicant considers that due to site and highway constraints, there are no options to increase bus standing space along Park Lane or elsewhere within the Site. Officers agree with this conclusion, although accept that the need for additional bus standing space in the COA will need to be considered further between the Council and TfL.

#### *Servicing and Fairfield Halls Forecourt Management*

7.253 London Plan Policy 6.3 makes clear that impacts on transport capacity and the network must be fully assessed and Policy 6.14 states that development proposals should promote the uptake of Delivery and Service Plans. Croydon Local Plan Policy SP8 promotes efficient and sustainable arrangements for the transportation and delivery of freight.

7.254 As outlined above, the Applicant's servicing strategy is based on using College Road and the existing College ramp/proposed replacement ramp (within Block 3) to service the proposed development, with the existing and reconfigured Barclay Road servicing Fairfield Halls.

- 7.255 The applicant has submitted a Framework Servicing and Delivery Plan for the proposed Phase 1A residential and Gallery. This demonstrates acceptable delivery and waste collection arrangements and it is recommended that compliance with this Plan is secured by planning condition.
- 7.256 The Applicant has submitted a Service Yard Management Plan for Fairfield Halls (Lower and Upper Service Yards). This outlines two servicing scenarios. The preferred scenario shows the long-term arrangement based on the proposed vehicle lift for the Lower Yard that would serve the backstage area level, which is higher than the service yard level. The alternative scenario could be operational if the proposed vehicle lift were not to be implemented at the outset when Fairfield Halls is due to reopen. The Plan demonstrates that both scenarios would be acceptable and it is recommended that compliance with the Plan is secured by planning condition.
- 7.257 The Applicant has submitted a Fairfield Halls Forecourt Management Plan. The proposed works to Fairfield Halls include slightly amending the existing vehicular entry and exit points off Park Lane to improve pedestrian permeability and safety. The proposed forecourt would include 2 x dedicated coach spaces, 3 x dedicated taxi spaces and 4 x 'Blue Badge' car parking spaces and a drop-off/pick up place. Discussions with the former operators of Fairfield Halls indicates that for the majority of performances/exhibitions, there was an average of two coach trips visiting the site at any one time and the proposed two spaces should be sufficient. During busy periods, including the pantomime season, it is proposed that additional coaches drop-off and pick up from the forecourt be provided, but with coaches park remotely whilst the shows are taking place. Officers are not satisfied with the currently proposed off-site coach parking strategy and it is recommended that approval of a Forecourt Management Plan is secured by condition to allow agreement to be reached on a more appropriate strategy.
- 7.258 Servicing and delivery arrangements for the proposed 'Outline' elements of the proposals (Phases 2 and 3) would be determined at the Reserved Matters stage and it is recommended that detailed Servicing and Delivery Plans for each Block are secured by a planning obligation at that stage.

#### *Travel Planning*

- 7.259 London Plan Policy 6.3 makes clear that, amongst other things, workplace and residential travel plans should be provided in support of significant applications. Croydon Local Plan Policy SP8 supports travel plans as a tool for reducing car parking/traffic.
- 7.260 The Applicant has submitted Framework Travel Plans for Fairfield Halls and the Gallery. These identify packages of measures to encourage sustainable modes of travel to the Halls and the Gallery. This wide range of policy, infrastructure, information and awareness measures are acceptable in principle and it is recommended that planning conditions require the submission, approval and implementation of detailed Travel Plans based on these principles, before Fairfield Halls re-opens or the Gallery opens.
- 7.261 The Applicant's TA (Appendix P Volume IIB Technical Appendices) also includes travel planning principles for the proposed Phase 1A residential development and it is recommended that a detailed Travel Plan for this element of the scheme (based on these principles) is secured by planning condition. Travel planning for the proposed

'Outline' elements of the proposals (Phases 2 and 3) would be determined at the Reserved Matters stage and it is recommended that detailed Travel Plans for each Block are secured by a planning obligation at that stage.

### *Construction Traffic*

7.262 London Plan Policy 6.3 makes clear that, amongst other things, that Construction Logistics Plans should be submitted to support strategic development proposals.

7.263 The ES identifies the worse case effects as being in Phase 2, when approximately 51 movements per day are anticipated (over a 10 hour day). All vehicle movements are expected to arrive and depart from Barclay Road and all construction compounds would be contained within the application Area. The Applicant's assessment is that the proposed increase in HGVs on Barclay Road and Park Lane of 1.5% and 5.7% respectively would be 'negligible' in terms of highway severance, driver/pedestrian/cyclist delay. The ES does identify potential minor adverse effects in relation to accidents and safety.

7.264 To mitigate potential adverse effects, the Applicant's TA includes a Framework Construction and Demolition Logistics Plan which sets out principles in relation to demolition, construction supply chain management, construction staff travel plan, construction access and monitoring. To provide flexibility in the letting of contracts, it is recommended that planning conditions secure the prior approval of detailed separate Demolition and Construction Logistics Plans for 'Excluded Works' (demolition, site preparation etc.) and main works for Phase 1A and each Block in Phases 1B, 2 and 3. Separate detailed Plans also provide the opportunity to co-ordinate activities with other construction projects taking place in the COA.

### **Amenities of Adjoining Occupiers**

7.265 CLP1 Policies SP4.1 and SP4.2 seek to respect and enhance character to create sustainable communities. CLP1 Policy SP.2 supports the minimum standards in the Mayor of London Housing SPG and Saved CRUDP Policy UD8 states that the residential amenity of adjoining occupiers should be protected.

### Outlook and Privacy

7.266 As discussed under Design and Townscape above, the ES Addendum reports on an assessment of the likely significant effects on 10 groups of residents ('Key Visual Receptors') in nearby streets (at Altitude 25, Altyre Road Barclay Road, Chatsworth Road, George Street Fairfield Path, Lebanon Road, Park Lane, Stanhope Road and Whitgift Almshouses). This concludes that none would have their visual amenity significantly affected during either construction or when the proposed scheme is built. Officers agree with this assessment.

7.267 The London Plan Housing SPG (2.3.36) notes that former commonly used minimum separation distances between habitable rooms of 18 – 21m may be useful yardsticks, but advocates a more flexible approach to managing privacy. The existing houses and flats on the south side of Barclay Road are approximately 30m away from proposed new housing in Block 6 and the existing flats above Nos. 71 and 73 George Street are at least approximately 24m away from proposed new housing in Block 2. Other existing/proposed residential properties are significantly further away. These distances should satisfactorily safeguard privacy for existing occupiers.

### Daylight and Sunlight

7.268 The ES Addendum reports on an assessment of the likely daylight and sunlight effects on existing houses facing Barclay Road and existing flats on the upper floors of 71-73 and 77-79 George Street.

7.269 The Barclay Road properties, which are to the south of the proposed development, are not expected to experience a significant loss of daylight or sunlight (with existing VSC levels being relatively good and relatively minor reductions predicted). The George Street properties, which are to the north of the site, are expected to be significantly adversely affected, both in terms of daylight and sunlight. However, the proposed daylight (VSC) levels are generally in their teens. As discussed above in relation to the proposed new housing, the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values lower than this are deemed acceptable.

### Noise

7.270 The ES Addendum includes an assessment of likely noise impacts on a number of sensitive receptors in the adjoining area, including the Magistrates and Family Courts from the set-up and demolition associated with Phase 1A and the occupiers of flats on the upper floors of 71-73 and 77-79 George Street, AMP House and the approved Ruskin Square development, the County Court, 24 Barclay Road and Ashton Court on Chatsworth Road. This identified potential significant adverse effects during the demolition and construction phase for the occupiers of the Courts during site set-up and demolition in Phase 1A, the occupiers of Fairfield Halls during all works in Phase 1A and the occupiers of Ashton Court on Chatsworth Road and the future occupiers of the Phase 1A residential development during various stages of Phase 3. However, the ES Addendum finds that these would be satisfactorily mitigated by the implementation of an approved Construction Environmental Management Plan (CEMP) and Construction Logistics Plan (CLP). It is recommended that planning conditions are attached to any permission requiring approval of CEMPs and CLPs for the various phases of the proposed works and officers are satisfied that these would adequately safeguard the amenities of occupiers of these buildings.

### Wind

7.271 The ES Addendum reports on the findings of an assessment of the likely wind effects of the revised scheme on the surrounding area, including locations along both footways along George Street and Barclay Road, the west side of Park lane and Hazeldean Bridge. This found that wind conditions in the surrounding area would be safe and suitable in terms of pedestrian comfort for their use.

## **Environment and Sustainability**

### Energy and Sustainable Design & Construction

7.272 London Plan Policies 5.2 and 5.3 state that development should minimise carbon dioxide emissions and exhibit the highest standards of sustainable design and construction. For the period 2013-16, a reduction in carbon dioxide emissions is required of 35% over the Target Emission Rates required by Part L 2013 of the Building Regulations for residential and non-residential development. This increased to 'zero

carbon' for residential development for the period 2016-2031. However, the Council is applying this policy to schemes referable to the Mayor post 1 October 2016 and so the 35% target applies to this scheme.

7.273 London Plan policy 5.5 states that boroughs should seek to create decentralised energy networks and Policy 5.6 requires development proposals to connect to an existing heating network as a first preference if one is available. London Plan Policy 5.7 encourages on-site renewable energy generation.

7.274 CLP1 Policy SP6.2 requires developments to make the fullest contribution to minimising carbon dioxide in line with the London Plan Policy and requires major residential schemes to incorporate site wide communal heating systems and to be enabled for district energy connection. The OAPF expects new development to help deliver and connect into a Croydon Central Area Heat and Power Scheme.

7.275 London Plan (Policy 5.2) makes clear that where specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through cash in lieu contributions. The Council has adopted a price for carbon of £46/tonne for the purposes of off-setting and the draft s106/CIL non-statutory guidance note (September 2016) makes clear that payments will be sought where proposed development is expected to miss the required target reduction, with all such contributions being ring-fenced within a "Community Energy Fund" and used to deliver CO2 reduction projects across the Borough

### Energy Strategy

7.276 The Applicant's revised Energy and Sustainability Statement (December 2016) responds to a number of points raised by the GLA in its Stage 1 Report. The energy strategy is summarised below.

#### *Phase 1A:*

- Lean - Energy efficiency measures
- Clean – Communal heating system with an Energy Centre created within the existing boiler house space of Fairfield Halls (2 x gas fired Combined Heating and Power (CHP) units and a connection point to allow for connection a future Croydon District Heating Scheme and back-up high efficiency gas boilers).
- Green - Photovoltaic panels (50sqm) on roof of extended Arnhem Gallery (Fairfield Halls).

#### *Phase 2:*

- Lean - Energy efficiency measures.
- Clean - Energy Centre (location to be confirmed) to be sized to supply Blocks 1 to 5 and to include gas fired high efficiency modular boilers and gas fired CHP units. Pipes would be routed underground to the first Block that is constructed and extended to other Blocks as they are built out. The Phase 2 network shall connect into the Phase 1A network to allow energy sharing and connection to the CDHS.
- Green – Unknown.

#### *Phases 1B and 3:*

- Lean - Energy efficiency measures.
- Clean – Blocks 6 and 7 would be connected to the Phase 1A energy network.
- Green – Unknown.

7.277 The applicant's Statement demonstrates that, in combination, for Phase 1A as a whole, the above strategy would deliver overall carbon dioxide savings of 43% over the Target Emission Rates required by Part L 2013 of the Building Regulations. This is welcomed and it is recommended that minimum reductions for each element of Phase 1A (Residential, commercial units in Building C, Fairfield Halls extensions, the gallery) in line with the Applicant's Strategy are secured by planning condition.

7.278 The Applicant's Energy Strategy includes a plan showing indicative plant room and pipe locations for the extension of the Phase 1A communal heating network to cover Phase 1B, 2 and 3. This plan also shows a future connection point to a future Croydon District Heating Scheme running along Park Lane, with a connection point proposed along Hazeldean Walk (to the north of a reconfigured College Green). The Strategy also confirms that Phases 1B, 2 and 3 are capable of meeting the minimum 35% carbon dioxide reduction through a combination of 'Lean', 'Clean' and 'Green' measures. It is recommended that subsequent S.106 Agreements for each Block require that:

- Applications for the approval of Reserved Matters are accompanied by an Energy Statement demonstrating at least a 35% improvement in carbon dioxide emissions over the 2013 Building Regulations and a Communal Heating implementation Plan showing how that Block would be connected to with the Phase 1A Network and make passive provision for connection with other Blocks.
- Any under achievement to be the subject of carbon offsetting costs based on £45 for each tonne of carbon dioxide below the required minimum 35% reduction that cannot be achieved on site.

7.279 The ES Addendum includes a commitment that the CHP plant would be designed to meet appropriate nitrogen dioxide emission standards and it is recommended that this is secured by planning condition/subsequent S.106 Agreement. It is also recommended that planning conditions secure the delivery of the proposed Communal Heating Network and details of the proposed PV array on the roof of an extended Arnhem Gallery.

#### Environmental standards

7.280 London Plan Policy 5.3 (Sustainable Design and Construction) advocates the need for sustainable development and the London Plan Sustainable Design and Construction SPG (April 2014) sets out targets and provides guidance as to how to achieve those targets as efficiently as possible. CLP Policy SP6.3 requires new housing to comply with Code for Sustainable Homes (CfSH) Level 4 or equivalent and new non-residential space of 500sqm or more to meet BREEAM 'Excellent' standard or equivalent.

7.281 The Government has withdrawn the CfSH and the objective in CLP Policy SP6.3 cannot be secured. However, the Ministerial Statement withdrawing the CfSH makes clear that LPAs may continue to apply requirements relating to water efficiency. As such, officers recommend that a planning condition/S.106 Agreement secures compliance with the standard set out in the Mayor's SPG of 105 litres per person per day – which is equivalent to what was required by the former CfSH Level 4.

7.282 The proposed new build non-residential elements of Phase 1A (extensions to Fairfield Halls, commercial units in Building C and the new-build element of the gallery) and all

new non-residential floorspace in Phases 2 and 3 should all be designed to meet the BREEAM 'Excellent' standard. Officers recommend that this is secured by planning condition/subsequent S.106 Agreement.

### Waste

7.283 London Plan Policy 5.16 seeks to minimise waste and amongst other things, exceed recycling and reuse levels in construction, excavation and demolition waste of 95% by 2020. The Mayor of London's Sustainable Design and Construction SPG (2014) makes clear that developers should maximise the use of existing resources and materials and minimise waste through the implementation of the waste hierarchy.

7.284 The ES Addendum contains a commitment that a Site Waste Management Plan (SWMP) will be prepared by main contractors and that a hierarchical approach to demolition and construction waste will be applied by the implementation of SWMPs. Officers recommend that this commitment is secured by planning condition/subsequent s.106 Agreement.

### Flooding and Drainage

7.285 London Plan Policy 5.12 makes clear that proposals must comply with national requirements on flood risk and Policy 5.13 calls for development to utilise Sustainable Urban Drainage Systems (SUDS) unless there are practical reasons for not doing so. CLP1 Policy SP6.4 requires Flood Risk Assessment for major proposals in Flood Zone 1 and the utilisation of SUDS to reduce surface water runoff. The Council as the Lead Local Flood Authority has also prepared an advice note. The application is supported by a Flood Risk Assessment and Drainage Strategy that takes account of the revisions to the application scheme and officer comments.

7.286 The Site is within Flood Zone 1 (Low Probability) of fluvial flooding, although parts the uncovered basement parts of the site are identified as having a potentially high risk of surface water flooding, with estimated depths of up to 900mm. In response to this, the proposed Drainage Strategy includes water storage measures needed to achieve a 50% reduction in water runoff at peak times. This would ensure that no surface water flooding should occur up to and including the 1 in 100 year storm event, taking account of climate change.

7.287 The existing and proposed podium structure that covers part a large part of the Site constrains drainage options and sub-surface storage areas are not suitable in some places. The proposed strategy for Phase 1A comprises sub-surface storage tanks under Fairfield Halls forecourt and the eastern part of a reconfigured College Green (restricting flow in to existing sewers), augmented by green roofs for Buildings A, C and D (a total of 1,245sqm). A similar strategy is proposed for Phases 2 and 3 with sub-surface tanks proposed for south of George Street (in between Blocks 2 and 3), the western end of College Road and the proposed Station Link South where the existing Courts are – all augmented with green roofs. Parameter Plan 13 (Roof Level) allows for green roof areas to be developed on all Blocks and details of these areas would form part of applications for Reserved Matters approval. The proposed foul water drainage strategy is based on a number of basement pumping stations to discharge to existing manholes offsite.

7.288 It is not clear from Thames Water's standard comments whether it has considered the Applicant's surface water and foul drainage strategies. Nevertheless, these refer

to the need to seek approval from Thames Water for an Impact Study to demonstrate acceptable discharges (with necessary attenuation) into the public network. The Lead Local Flood Authority (LLFA) and the Environment Agency are generally satisfied with the Applicant's strategies, but the LLFA requires details of the Thames Water Impact Study and both recommend that detailed drainage solutions and management and maintenance arrangements are reserved for further detailed consideration. Thames Water wants to approve piling and foundation design to protect its assets (including a main sewer that crosses the site) and the Environment Agency wants to ensure that piling, foundations design and any infiltration safeguards the quality of groundwater. It is recommended that planning conditions secure the submission and approval of drainage details for Phase 1A for each of the Blocks that comprise Phases 2 and 3.

### **Relationship with approved schemes**

7.289 As outlined in Section 3 (Planning History), planning permission has either been granted or resolved to be granted for three sites in the north-east part of the Site. These comprise major mixed-use schemes on the sites of 101 George Street (LBC Ref 14/01594/P) (part of Block 2), the East College site (LBC Ref 14/01603/P) (part of Block 5) and the Mondial site (16/00180/P) (part of Block 3).

7.290 London Plan Policy 7.6 makes clear that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings and should optimise the potential of sites. CLP Policy SP1 states that the Council will take a positive approach to managing development that reflects the presumption in favour of sustainable development contained in the NPPF.

7.291 Whilst the Applicant intends to continue to work with the landowners of these three sites to bring forward a comprehensive development of the Site in accordance with an approved 'Fair Field' development, it is possible that one or more of the approved stand-alone schemes could be developed. The Council as LPA needs to consider the implications of this when determining this planning application. Officers have considered the interrelationships between the approved schemes and the proposed Fair Field scheme and have concluded that the revised Fair Field Parameter Plans and Design Guidelines (a) allow for one or more of the approved schemes to be developed and (b) allow for the partial implementation of an approved Fair Field scheme to sit alongside one or more of the approved scheme in an acceptable way. Full details of this part of the Fair Field proposals would be submitted at the Reserved Matters stage, but in summary:

- The proposed 'Extents of Excavation' (Parameter Plan 3) and Minimum and Maximum Footprints (Parameter Plans 4a, 4b and 4c) for Blocks 1, 3 and 5 allow for the development of one or more of the approved schemes to sit alongside buildings built out under a Fair Field permission and have an acceptable relationship between them in terms of daylight and sunlight and privacy;
- The proposed Public Realm and Open Space arrangements (Parameter Plan 5), Pedestrian and Cycle Access and Vehicular Access and Circulation arrangements (Parameter Plans 14 and 15) allow for the approved College East and Mondial schemes to be built out whilst allowing for acceptable vehicular access, including servicing vehicles, and pedestrian/cycle access arrangements to for the remainder of an approved Fair Field scheme.
- The proposed Design Guidelines provide satisfactory guidance for ensuring that detailed designs for buildings and public realm areas built out under a partially implemented Fair Field scheme would ensure a high quality overall development.



7.292 As discussed under Access, Movement and Parking, there is a need to ensure acceptable pedestrian access arrangements between George Street and the proposed lowered podium (part of Phase 1A) and recommended Planning Condition A24 would reserve these details for subsequent approval.

7.293 The three approved schemes have also been taken into account during the EIA process, with the submitted ES, ES Addendum and ES Addendum Supplement reporting on a sensitivity test to understand how the proposed Fair Field scheme would interact with the three schemes should they proceed separately or together – based on a ‘worse case scenario’ that all three approved schemes are built.

## **Other Matters**

### *Environmental Impact Assessment*

7.294 Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) (the EIA Regulations) identifies ‘urban development projects’ as requiring an EIA if the development includes more than 1 hectare of development which is not dwelling-house development or it includes more than 150 dwelling-houses or the area of the development exceeds 5 hectares and, in each case, the development is likely to have significant effects on the environment by virtue of factors such as size, nature and location.

7.295 Officers informally screened the need for EIA in this case and have agreed with the Applicant that the proposals constitute EIA Development. The Applicant submitted an EIA Scoping Request in December 2015 and the Council issued an EIA Scoping Opinion (LBC Ref 15/5609/DT) in February 2016. This advised that the Environmental Statement (ES) should assess the proposals in respect of Traffic, Transport and Movement, Noise and Vibration, Air Quality, Ground Conditions and Contamination, Archaeology, Townscape and Visual, Built Heritage, Wind Microclimate, Daylight, Sunlight and Overshadowing, Socioeconomic and Cumulative Assessment.

7.296 The planning application submitted in February 2016 was accompanied by an ES that addressed these matters. However, in August 2016, officers issued a request pursuant to Regulation 22(1) and 22(10) of the EIA Regulations that the ES should contain further information in relation to Noise and Vibration, Townscape and Visual Assessment, Daylight, Sunlight and Over shadowing, Socio-economic and Cumulative Assessment. The request also sought clarification in relation to a number of other matters. In December 2016, the Applicant submitted an ES Supplement that addressed the majority of the requests for further information. This was supplemented in January 2017 by additional further information relating to likely significant overshadowing and socio-economic effects.

7.297 By virtue of Regulation 3 of the EIA Regulations, the LPA cannot grant planning permission in respect of the application unless it has first taken in to consideration the environmental information. The environmental information means the ES, any further or other information received, any representations made by any consultation bodies and any representations made by any other person about the environmental effects of the proposed development.

7.298 The environmental information is referred to, where appropriate, throughout earlier sections of this report when discussing the main planning issues relating to the

acceptability of proposed land uses, housing mix and quality, affordable housing, design and townscape, effects on heritage assets, access, movement and parking, amenities of adjoining occupiers, environment and sustainability and relationship with approved schemes. The ES (as revised) includes a helpful sensitivity assessment of the three 'approved schemes' (including issues relating to wind and microclimate) in the north-east corner of the Site and includes a satisfactory assessment of the likely cumulative effects in parallel with other relevant committed schemes. The delivery of all identified necessary mitigation measures and environmental commitments would be secured by way of the recommended planning conditions or future planning obligations. The following two sub-sections draw on the environmental information to discuss air quality and contamination.

#### *Air quality*

7.299 London Plan Policies 7.14 and 7.15 seek to safeguard and improve air quality. CLP1 Policy SP6.3 requires development to positively contribute to improving air quality by minimising pollution. Saved CRUDP Policy EP1 states that development that may cause or be affected by air pollution will only be permitted if the health, safety and amenity of users is not put at risk and the quality and enjoyment of the environment would not be damaged or put at risk. The whole borough is an Air Quality Management Area (AQMA) (nitrogen dioxide).

7.300 The ES reports on an Air Quality Assessment that considers likely significant effects on future sensitive receptors on site and in the local area. This identifies a potentially 'medium to high' risk of dust during the construction phase, but this would be reduced to 'negligible' with the implementation of a Construction Environmental Management Plan (CEMPs). Officers recommend that CEMPs and Construction Logistics Plans for Excluded Works and main works are secured by planning conditions.

7.301 In terms of operation, the ES identifies a potential negative impact from the operation of the proposed CHP plant and identifies the use of plant that meet appropriate nitrogen dioxide emission standards. Officers recommend that this is secured by planning condition. Overall, given the reduction in road traffic that would be associated with the proposed development, the ES identifies 'negligible' to 'moderate beneficial' likely effects during the operation phase. It should also be noted that the proposed installation of Electric Vehicle Charging Points, recommended to be secured by condition, would encourage the use of electric vehicles.

#### *Contamination*

7.302 London Plan Policy 5.21 supports the remediation of contaminated sites. CLP1 Policy SP6.3 requires development to positively contribute to improving the quality of land. Saved CRUDP Policy EP1 states that development that may cause or be affected by soil or water pollution will only be permitted if the health, safety and amenity of users is not put at risk and the quality and enjoyment of the environment would not be damaged or put at risk. Saved CRUDP Policies EP2 and EP3 seek ensure that the land is suitable for the proposed use and that an investigation into the extent of any possible contamination is required.

7.303 Given the historical use of the Site, including use as former railway sidings and gravel pit, there is the potential for contaminants to be present on the site. The ES reports on a Ground Conditions and Contamination Assessment. This finds that potential 'minor' to 'moderate' adverse effects during the construction phase (including risk to workers)

could be mitigated by the implementation of an appropriate Construction Environmental Management Plan CEMP. Officers recommend that CEMPs for Excluded Works and main works are secured by planning conditions, resulting in no significant effects.

7.304 In terms of the operational phase, the ES identifies potential adverse effects associated with contamination of aquifers and the Environment Agency has asked that details of a site investigation and any necessary remediation strategy, piling and foundation design and infiltration measures are reserved by condition. Officers recommend that standard conditions are attached requiring ground investigation and remediation strategies to be approved by the LPA.

#### *Community Infrastructure Levy & New Homes Bonus*

7.305 The Mayor of London's Crossrail Community Infrastructure Levy (CIL) Charging Schedule (2012) sets a CIL rate of £22.97 per square metre for Croydon (excluding health, education and social housing uses). Croydon's CIL Charging Schedule (2013) sets a CIL rate for the CMC area of £0 for residential, residential institutions and non-residential institutions (C3, C2 and D1) and £133.62 per square metre for other uses. These rates are reviewed annually. Based on the Illustrative Scheme, including 15% affordable housing, the expected overall levels of CIL are in the order of £3,178,000 (Mayoral) and £7,410,000 (Croydon). The actual amount of CIL payable would be calculated on a Block by Block (and sub-Block) basis and paid upon commencement of development in the relevant Block (or sub-Block).

7.306 The proposed housing in Phase 1A (at least) would also attract New Homes Bonus in accordance with the Government's New Homes Bonus Calculator.

#### *Delivery issues and Planning Obligations*

7.307 London Plan Policy 8.2 makes clear that the Mayor expects proposals to address strategic as well as local priorities in planning obligations. These are cited as affordable housing, Crossrail and other public transport improvements, climate change, air quality, social infrastructure and the provision of small shops. CLP1 Section 8.1 includes S.106 Agreements as one of a number of strands for delivering the Council's planning objectives and policies

7.308 The Applicant is the Council's Housing and Regeneration Department. It is a matter of law that the Council as applicant cannot enter in to a legal agreement with itself in its capacity as Local Planning Authority. Accordingly, officers recommend that all necessary mitigation measures (as identified in the Environmental Statement) and other matters that need to be secured in order for the proposed development to be acceptable are secured by way of planning conditions.

7.309 A range of planning conditions is recommended to manage the implementation and use of the proposed Phase 1A development (the 'Detailed' element), which is on land that, apart from a small area of land owned by Croydon College, is owned by the Council. This includes a condition requiring the applicant (the Council or their heirs and successors in title) to enter into a legal agreement with TfL to pay the necessary transport financial contributions to mitigate negative impacts on public transport associated with additional trips generated by Phase 1A.

7.310 A further range of planning conditions is recommended to manage the implementation and use of Phases 1B, 2 and 3) (the 'Outline' element), which, apart from part of Phase 1B, is not owned by the Council and is in a range of different ownerships. This includes a planning condition requiring land owners of each Block to enter into a S.106 Agreement with the LPA before any development in that Block takes place. It is recommended that future S.106 Agreements in relation to development proposals for Blocks 1 to 7 would secure mitigation measures and financial contributions where necessary, in accordance with legal requirements. These are identified in the Recommended Heads of Terms set out in Section 4 of this report.

7.311 Any planning permission could be implemented by either the Council, Brick by Brick or by any other developer, subject to the consent of the relevant landowner(s) and building within the parameters established by approved plans and documents, planning conditions and in the case of the 'Outline' element, planning obligations secured by future s106 Agreements.

### **Conclusions**

7.312 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.