

# Planning Committee Agenda



To: Councillor Chris Clark (Chair)  
Councillor Leila Ben-Hassel (Vice-Chair)  
Councillors Paul Scott, Clive Fraser, Toni Letts, Callton Young, Scott Roche,  
Gareth Streeter, Ian Parker and Lynne Hale

Reserve Members: Joy Prince, Jamie Audsley, Bernadette Khan,  
Caragh Skipper, Andrew Pelling, Pat Clouder, Michael Neal,  
Badsha Quadir, Helen Pollard and Vidhi Mohan

A meeting of the **Planning Committee** which you are hereby summoned to attend, will be held on **Thursday, 15 October 2020 at 6.30pm**. This meeting will be held remotely. Members of the Committee will be sent a link to remotely attend the meeting in due course.

**PLEASE NOTE:** Members of the public are welcome to remotely attend this meeting via the following web link: <http://webcasting.croydon.gov.uk/meetings/10791>

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[www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)  
Wednesday, 7 October 2020

If you would like to record the meeting, we ask that you read the guidance on the recording of public meetings [here](#) before attending

To register a request to speak, please either e-mail [Democratic.Services@croydon.gov.uk](mailto:Democratic.Services@croydon.gov.uk) or phone the number above by 4pm on the Tuesday before the meeting.

The agenda papers for all Council meetings are available on the Council website [www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)

If you require any assistance, please contact Michelle Ossei-Gerning  
020 8726 6000 x84246 as detailed above.

## **AGENDA – PART A**

**1. Apologies for absence**

To receive any apologies for absence from any members of the Committee.

**2. Minutes of Previous Meeting**

To approve the minutes of the meeting held on Thursday 8 October 2020 as an accurate record.

[To Follow]

**3. Disclosure of Interest**

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

**4. Urgent Business (if any)**

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

**5. Development presentations (Pages 7 - 8)**

To receive the following presentations on a proposed development:

**5.1 20/00549/PRE 922-930 Purley Way, Purley, CR8 2JL**  
(Pages 9 - 34)

Erection of three apartments blocks to provide 149 homes with a maximum height of 14 storeys with alterations to the land levels associated landscaping, continued use of the existing highway accesses and car/cycle parking as well as bin storage.

Ward: Purley and Woodcote

**5.2 19/05195/PRE 550 to 550A Purley Way, Croydon, CR0 4RF**  
(Pages 35 - 62)

Demolition of existing commercial properties, erection of two blocks, a southern block of 8 storeys, and northern block up to 15 storeys, providing 125 homes including 4 live/work units, with car and cycle parking and associated landscaping.

Ward: Waddon

**5.3 19/05194/PRE Citylink House, 4 Addiscombe Road, Croydon, CR0 5TT** (Pages 63 - 86)

Demolition of the existing buildings. Erection of a part 27/part 13 storey building to provide approximately 494 shared-living units (sui-generis), 77 residential dwellings (C3), flexible (D1/B1) floorspace and retail/cafe (A1/A3) space.

Ward: Addiscombe West

**6. Planning applications for decision** (Pages 87 - 90)

To consider the accompanying reports by the Director of Planning & Strategic Transport:

There are none.

**7. Items referred by Planning Sub-Committee**

To consider any item(s) referred by a previous meeting of the Planning Sub-Committee to this Committee for consideration and determination:

There are none.

**8. Other planning matters** (Pages 91 - 92)

To consider the accompanying report by the Director of Planning & Strategic Transport:

There are none.

**9. Exclusion of the Press & Public**

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

"That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended."

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## **PLANNING COMMITTEE AGENDA**

### **PART 5: Development Presentations**

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#### **1 INTRODUCTION**

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

#### **2 ADVICE TO MEMBERS**

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

#### **3 FURTHER INFORMATION**

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

#### **4 PUBLIC SPEAKING**

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

#### **5 BACKGROUND DOCUMENTS**

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

#### **6 RECOMMENDATION**

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

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**PART 5: Development Presentations**

**Item 5.1**

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**1. DETAILS OF THE DEVELOPMENT**

Ref: 20/00549/PRE  
Location: 922-930 Purley Way, Purley, CR8 2JL  
Ward: Purley and Woodcote  
Description: Erection of three apartments blocks to provide 149 homes with a maximum height of 14 storeys with alterations to the land levels associated landscaping, continued use of the existing highway accesses and car/cycle parking as well as bin storage.  
Applicant: Justin Homes  
Agent: Icen Projects  
Case Officer: Tim Edwards

**2. PROCEDURAL NOTE**

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent application, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 A planning application for the proposed development would be referable to the Mayor of London under the Mayor of London Order 2008.
- 2.4 The applicant has submitted a pre-application enquiry to the Greater London Authority (including consideration by Transport for London) for an opinion. A meeting is due to take place on 6<sup>th</sup> October. If required a planning addendum shall provide an update accordingly on the GLA verbal feedback from this meeting.
- 2.5 The report covers the following points:
- a) Executive summary of key issues with scheme
  - b) Site briefing
  - c) Place Review Panel feedback
  - d) Summary of matters for consideration
  - e) Specific feedback requests

### **3. EXECUTIVE SUMMARY**

- 3.1 The proposed scheme is for the erection of three blocks ranging from six to fourteen storeys in height. This would comprise 149 units across the site with associated communal areas and amenity space alongside wheelchair accessibility parking spaces and an access from Purley Way.
- 3.2 The scheme has developed through a series of pre-application meetings with officers and consideration by the Place Review Panel (PRP) on two occasions (with the second PRP discussion also taking place on 15<sup>th</sup> October 2020). A summary of the Panel's first feedback is included within this report and a verbal overview of the feedback provided following the second review shall be provided to Planning Committee.
- 3.3 The site is well located within a high PTAL, closely located to public transport, local shops and services and is adjacent to a prominent intersection. It is just beyond the District Centre boundary and falls within the environs of the Purley place specific policy. Due to its location it is considered to be a suitable site for an intensive development to make best use of sustainable transport and services but an appropriate development also needs to respond to the suburban context (detached two storey houses) adjacent. The scheme forms a series of three buildings increasing in height from the north (6 storeys, adjacent to a detached house) a middle block of 9 storeys and a corner block of 14 storeys. The increasing heights is felt to be a good mechanism for responding to the change in character and site geometry to the south. This element of the proposal would exceed place specific policies but this is considered to potentially be appropriate if a scheme of very high quality can be secured (subject to townscape views), owing to the sites shape and location within Purley. Whilst further design development and confirmation on quality of living accommodation and external spaces is still required, the development does appear to take a logical and well considered approach to the site layout, massing, bulk and design, although further refinement is required in regards to detailing and materiality is necessary, as well as some additional testing.
- 3.4 As currently set out the proposed affordable housing offer would exceed the minimum 30% policy requirement, with this currently proposed at 35%.

## 4. SITE BRIEFING

- 4.1 The site lies on the western side of Purley Way, within 400 metres of the District Centre and approximately 600 metres walk from Purley Railway Station, as well as being within close proximity to numerous bus routes at its furthest point.



Figure 1: Site Location (shown in red triangle) left and Google Map (right)

- 4.2 The site currently includes 5 detached dwellings which front onto Purley Way where their vehicular and pedestrian accesses are located. The houses also back onto Coldharbour Lane, which is a former bridle way now used as a pedestrian and dedicated cycle way. The overall site has an area of 0.45 hectares.
- 4.3 The existing properties are a mixture of styles and forms, with land levels stepping up from the southern tip of the site, where part of 930 Purley Way's garden is currently situated to the northern boundary of 922 Purley Way, by approximately 5 metres. The site also steps by approximately by 3 metres from front (east) to the rear (west).



Figure 2: From Left to Right – 930, 928, 926, 924 and 922 Purley Way

- 4.4 All five homes have existing vehicular access from Purley Way and varying forms of trees located across the sites. None of the trees are protected formally through

Tree Preservations Orders (TPO's). There are also street trees located along the grass verges at the front of the site.

- 4.5 The site PTAL (Public Transport Accessibility Rating) ranging from 5 at the southern end of the site to 4 at the northern end. The site is located within an area at risk of surface water and is located within an area where there is potential for groundwater flooding to occur at surface.

### **Relevant Planning History**

- 4.6 There is no relevant planning history for this site but there a relevant history from the adjoining sites which are:

#### 29-35 Russell Hill Road - Ref: 19/03604/FUL

This site, is directly west of the proposed scheme. It was granted planning permission in February 2020 and proposed the demolition of four existing houses and the development of a scheme of 106 flats which reaches up to 8-storeys in height.

#### 37 Russell Hill Road - Ref: 19/00467/FUL

This site is also directly west of the proposed scheme. It was granted permission in December 2019 and proposes the demolition of 1 existing house and the development of a scheme of 47 flats, up to 8-storeys in height.



Figure 3: CGI image detailing the developments at 29 – 35 and 37 Russell Hill Road

#### Purley Baptist Church - Ref: 16/02994/P

This scheme was recently granted permission by the Secretary of State in July 2020 after having been called in by the Secretary of State initially in 2017. The scheme proposes a residential development with community floorspace, 200 homes and up to 17-storeys in height.



Figure 4: CGI image of Purley Baptist Church Scheme.

### Proposal

- 4.7 The proposal currently includes the demolition of the five homes and redevelopment with buildings ranging between six and fourteen storeys in height to provide 149 residential homes.
- 4.8 The development fronts both onto Purley Way to the east, Coldharbour Lane/Russell Hill Road to the west and being located within a prominent position within the wider district centre owing due to the land levels prevalent within and surrounding the District Centre.
- 4.9 The proposal would include three distinct flatted blocks with chamfered elevations to create views through and beyond the development from both directions. Block A would be split height - a maximum of 14 storeys, then stepping down to 10 storeys at the rear.



Figure 5: Proposed Site Layout (left) and CGI Image of the proposed scheme (right).

4.10 Block B would be 9 storeys in height with Block C being 6 storeys. Owing to the land levels on site Block A would be set below that of the other two blocks as the land rises to the north of the site. The lower ground floor of Block A and ground floor of Blocks B and C would utilise the land levels to position plant, cycle and refuse stores within the buildings.



Figure 6: Proposed Eastern Elevation fronting onto Purley Way

4.11 At the southern tip of the site would be an enlarged pavement area/public space which is currently proposed to external seating and planters. This is close to the bus stops which sits just outside the site and adjacent to Coldharbour Lane.



Figure 7: Proposed site layout and landscaping around Block A

4.12 In-between Block A and B, would be a dedicated child playspace with level access provided to this space from the front (east of the site). Stepped access then allows movement around Block B and towards a rear communal space, with hard landscaped and soft landscaped areas provided primarily between Block B and C as well as to the rear of Block C. One other area is located between Block B and C and would primarily be accessible from the front of the site due to the 3 metre change in the land levels from east to west. Indicatively the landscaping scheme aims to utilise this land level and include a climbing wall. Another soft landscaped area is proposed with additional tree planting between Block C and 920 Purley Way.



4.13 Each block proposed would include two entrances, Block A, having a primary entrance facing towards the District Centre and then a rear entrance which allow access to the communal areas. Blocks B and C have entrances both to the front and rear of the site from Colharbour Lane.



Figure 8: Proposed land levels at the rear of Block C and adjacent to 920 Purley Way

4.14 The development would provide 49 one bedroom units, 94 two bedroom units and 6 three bedroom units.

4.15 The proposal would include on-site servicing with an ingress and egress provided from Purley Way. The development would retain two of the existing crossovers for this.

4.16 It is understood that the applicant is intending to submit their planning application by the end of the year.

## 5. PLACE REVIEW PANEL FEEDBACK

5.1 An earlier iteration of the scheme was presented to the Council's Place Review Panel on 18<sup>th</sup> June 2020, in which the tallest part of the proposal was 9 storeys.



Figure 9: Proposed Eastern Elevation (top), Proposed site layout (bottom left) and Sketch image (bottom right).

5.2 The Panel's main comments were:

There is generally some support for the scheme. However there are many other items still to be resolved:

- 9 storeys constitutes a tall building and therefore requires clear justification in townscape terms. The Panel commented that just because this is a corner plot, it doesn't necessarily mean there is a need for a tall building. There is no justification of why this particular corner needs any kind of landmark.
- As well as no convincing arguments for the tall building there is also no evidence of exceptional architecture at present. The recommendation is to rethink the appropriateness of the tall building on this site.
- With regards the height transition between blocks, the 8 storey block is almost as tall as the 9 storey due to the sites topography. Therefore, it is suggested that the 8 storey building height is lowered to 7 or 6. It would appear much better as a pair of the 6 storey buildings which relate to each other, and one prominent (taller) building to the corner. These could have a different materiality.
- The applicant is advised to reconsider how the buildings are approached in terms of access, front doors and the relationship with landscape.

- The design should be amended to improve the legibility of entrances from the street, considering whether entrances should be grouped in a common lobby. Further investigation is needed regarding the “front” and “back” relationships.
- Regarding the lack of play space, the Panel noted that there is a potential for a large number of children in the scheme. It is currently difficult to identify where play might occur.
- The landscape looks somewhat leftover, leaving amenity spaces compressed between Block A and B and Russel Hill Road. All outdoor amenity spaces should be carefully designed and not be negatively affected by overshadowing of blocks.
- The front towards Purley Way is predominantly hard landscaped. Generally, there is a lack of well-designed open space, with lots of paths and retaining walls.
- Currently there is ambiguity and lack of definition on which spaces are publicly accessible and which are private for residents.
- There is very little information relating to the homes themselves, although the 70% dual aspect is promising. The applicant should consider the quantity and quality of facilities are proposed. It may be that in order to deliver successful amenity spaces, the quantum of accommodation on site should reduce. 133 homes on a site of 5 houses would appear over-development and a reduced scheme would more easily deal with the numerous design challenges.
- It was suggested that many of the above issues could be resolved if the scheme shifted into a two buildings rather than 3 blocks.
- The proposed architectural treatment at the corners appears to undermine the geometry of the plan form. Solid corners should be employed so as the blocks read as volumes rather than planes.
- The Applicant should undertake further contextual analysis to inform the architectural expression, fenestration, detailing and materiality. At present this looks generic and should be more place-specific. The recommendation is to review and revise the architecture approach and see how the contextual characteristics and local heritage can help to inform the proposal.

5.3 The scheme has progressed since Place Review Panel, with the key changes as follows:

- A contextual analysis has begun to influence the architectural expression of the scheme.
- Block A, has now increased in height from 9 to 14 storeys, with alterations to the massing. Justification for this height has started to take place and has been led by a number of Registered Provider interest in the scheme.
- Blocks B and C have been simplified.

- A 35% affordable homes offer is now proposed (the tenure mix is yet to be confirmed).

## **6. SUMMARY OF MATTERS FOR CONSIDERATION**

### Land Use

- 6.2 The London Plan sets a minimum ten year target for the borough of 14,348 new homes over the period of 2015-2025. The Croydon Local Plan (2018) sets a minimum twenty year target of 32,890 homes over the period of 2016 to 2036. The proposed development would create additional residential units that would make a significant contribution to the borough achieving its housing targets as set out in the London Plan (2016) and Croydon Local Plan (2018).
- 6.3 The Draft London Plan is nearing adoption, the Mayor of London in his 'Intend to Publish London Plan 2019' sets a 10 year target for Croydon of 20,790 homes. The Draft London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on sites with high PTAL (3 to 6).
- 6.4 The site has a high PTAL, good access to public transport, local shops and services and is well placed for high density residential-led development. The density of the development would 331 units/hectare, with the current London Plan depending on number of habitable rooms per unit, recommending between 45 to 260 u/ha for a urban location with PTAL of 4 to 6

### Affordable Housing

- 6.5 Policies SP2.4 and 2.5 of the Croydon Local Plan (2018) set out that a minimum of 50% of units must be secured as affordable housing on sites of ten or more homes. Policy seeks a 60:40 tenure split between affordable rented homes and intermediate (including starter) homes, unless there is agreement between Croydon Council and Registered Provider that a different tenure split is justified. The split seeks to provide a range of housing types to help ensure the creation of mixed and balanced communities.
- 6.6 To date no viability information has been provided however the applicant has stated that the proposal will meet the minimum 35% affordable housing level set by the GLA and the draft London Plan. As such, under the London Plan, this would take a fast-track route and not require viability testing for the GLA, subject to affordable tenure discussions. The applicant has stated that the tenure split will be agreed with the planning department with officers expecting further details on this point accordingly.

### Unit Mix

- 6.7 Policy SP2.7 sets a strategic target of 30% of all new homes up to 2036 to have three beds or more. SP2.5 states the Council will seek to ensure that a choice of homes is available in the borough which will address the borough's need for homes of different sizes. Policy DM1 of the Croydon Local Plan (2018) requires developments located within an Urban Area with PTAL 4/5 to provide 40% of the

units as three bedroom or larger. Policy DM1 does outline some exceptions where this quantum of larger units would not be sought. These exceptions are as follows:

- a) Where there is agreement with the associated affordable housing provider that three or more bedroomed dwellings are neither viable nor needed as part of the affordable housing element or any proposal, or
- b) Within three years of the adoption of the plan, where a viability assessment demonstrated that larger homes would not be viable, an element may be substituted by two bedroom, four person unit comply with the floor space specifications of national Technical Standards or the London Mayor's Housing SPG or equivalent.

6.8 At present 4% (6 homes) would be three beds, and 63% would be two bed four person (94 homes). The proposal would be policy compliant if the exceptions outlined in the policy above are met – which if relying on point b) above includes determination within three years of the adoption of the plan – by February 2021.

#### Quality of Residential Units

6.9 All of the proposed residential units meet minimum floorspace and private amenity spaces standards set out by the National Housing Space Standards. The proposal provides a number of communal spaces/with child playspace opportunities. At this stage, although 35% of the units are stated to be provided as affordable housing tenures, no clarification has been provided in regards to which units are proposed to be which tenure and therefore the amount of child playspace cannot be confirmed to be compliant with Policy DM10.4d of CLP2018 until this has been undertaken.

6.10 The Mayor of London Housing SPG advises that developments should minimise the number of single aspect dwellings, and that north facing units should be avoided. North facing is defined as having an orientation less than 45 degrees either side of north (i.e. between north west and north east).

6.11 A large number of the units are dual aspect (stated to be 70% as currently designed). There are some exceptions, most notably the middle units of Blocks B and C, with one unit proposed at lower ground floor within Block C which is north facing. Overall, whilst the other single aspect units are understood as they are not north facing and make up a low proportion of the overall unit numbers, the one proposed ground floor within Block C which is north facing is a concern to officers. Whilst this unit's orientation is led by the proposed servicing needs for the site and with outlook onto a potential open communal green space at this time with the information presented to officers, this unit is a concern.

6.12 To date, only indicative sunlight and daylight data has been provided for the residential units with a brief statement detailing that with the appropriate scaled fenestration all units could meet the BRE standards. At this stage officers consider that the massing of the development cannot be fully agreed until this has been provided.

- 6.13 Further details and reassurances will also need to be provided as to the quality of remaining residential units located at lower ground/ground floor level facing both onto Purley Way and Coldharbour Lane owing to the land levels and proximity of the building (Block A and the rear of Block B) to the footpath. The applicant needs to demonstrate that these future occupiers' amenities will be protected whilst ensuring that they have good levels of outlook.
- 6.14 In terms of privacy between the units, the blocks are separated by approximately 12 metres in line with the guidance set out by the Suburban Design Guide for relationships between new to new buildings. Further details are required to fully demonstrate this relationship, in-line with the proposed massing and height for the scheme.
- 6.15 The site is notably in close proximity to a busy road junction and therefore officers have requested noise and air quality assessments are undertaken. Whilst to date these assessment have not been submitted for consideration the architects have begun to incorporate these points into their design, with winter gardens as opposed to open balconies facing onto Purley Way (apart from where open balconies are proven to be acceptable for future occupiers). The landscape proposal has also considered tree locations and pollution tolerant tree species.
- 6.16 Owing to the site location, the sense of arrival to each building will be important, notably for Blocks B and C. Front and rear entrances have therefore been included, with dedicated pedestrian routes within the site.
- 6.17 In regards to accessibility, London Plan Policy 3.8 'Housing Choice' requires 90% of dwellings to meet M4(2) 'accessible and adaptable dwellings' Building Regulations requirement, with the remaining 10% required to meet M4(3) 'wheelchair user dwellings'. It is understood that the development would comply with these policy requirements, but it is unclear at what mix in terms of bedroom types and tenure.

### Height, Bulk and Design

#### *Policy Principle of Height*

- 6.18 Croydon Local Plan (2018) Policies SP4, DM15 and Place Policy DM42: Purley are the most relevant policies for considering the principle of a tall building within Purley. These policies will be analysed in turn below:

SP 4.5 states:

*“Proposals for tall buildings will be encouraged only in the Croydon Opportunity Area, areas in District Centres and locations where it is in an area around well-connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or District Centres. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and/or in District Centres, will be contained in the Croydon Local Plan’s Detailed Policies and Proposals. Furthermore the Croydon Opportunity Area Planning Framework*

*should be referred to when considering the location and design of tall buildings in the Croydon Opportunity Area.”*

- 6.19 The site is not within the Croydon Opportunity Area, and lies (just) outside the Purley District Centre. However it is well connected to public transport interchanges with Purley Train Station 600m at its furthest point from the site, which provides quick convenient connections into the Croydon Opportunity Area, Croydon Metropolitan Centre and other district Centres. The proposal as such does not conflict with the requirements of SP 4.5.

SP 4.6 states:

*“Some locations within the areas listed in SP4.5 will be sensitive to, or inappropriate for tall buildings and applications for tall buildings will be required to:*

- a. Respect and enhance local character and heritage assets;*
- b. Minimise the environmental impacts and respond sensitively to topography;*
- c. Make a positive contribution to the skyline and image of Croydon; and*
- d. Include high quality public realm in their proposals to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area”*

- 6.20 The above criteria will be considered in further depth within the rest of this report. It is considered that there is a reasonable prospect that a tall building (subject to detailed townscape analysis) in this location could meet the requirements of the policy.

Policy DM15 states:

*To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they meet the following criteria:*

- a. They are located in areas identified for such buildings in Policies DM34 to DM49;*
- b. They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4, with direct public transport connections to the Croydon Opportunity Area;*
- c. The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale;*
- d. The building height, footprint and design relates positively to any nearby heritage assets, and conserves or enhances the significance and setting of the assets of the wider historic environment;*
- e. To improve the quality of and access to open space, developments including buildings taller than 40 storeys will need to incorporate amenity space, whether at ground level such as atria or above ground level, such as sky gardens and roof terraces, that is accessible to the public as well as residents of the development; and*

*f. To ensure tall and large buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm.*

The relevant part of Policy DM42: Purley states:

*DM42.1 Within Purley District Centre and its environs, to ensure that proposal enhance and strengthen the character and facilitate growth, developments should:*

*a. Reinforce the continuous building line which responds to the street layout and include ground floor active frontages;*

*b. Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys; and*

*c. Demonstrate innovative and sustainable design, with special attention given to the detailing of frontages.*

- 6.21 The approved Purley Baptist Mosaic Development (Planning reference 16/02994/P), which includes a 17 storey building, is considered to have taken the policy allocation for a landmark tall building.
- 6.22 Given that two of the three blocks are over 8 stories, the development is likely to be considered a departure from Croydon Local Plan (2018). A Local Planning Authority may depart from development plan policy where material considerations indicate that the plan should not be followed, subject to any conditions prescribed by direction by the Secretary of State. The power to depart is set out in Article 32 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- 6.23 It is important that the Croydon Local Plan is read as a whole, and that failure to comply with a single policy within the plan would not necessarily lead to a sustainable reason for refusal. In order to justify the departure the council will need to be satisfied that the development is able to demonstrate clear benefits that actively and incomprehensively outweigh the areas of non-compliance.
- 6.24 It should be noted that the policy requires development to complement the existing building heights, rather than it must be 3 to 8 storey height. It could be argued that whilst the development is taller than the 8 storey height, especially noting the recently approved 8 storey schemes located within Russell Hill Road, west of the site and located at a high land level than the site, Block B being 9 storeys would therefore still be complementary to the site and surrounding, it would therefore be within the spirit of the policy parameters set out.
- 6.25 At this time whilst a taller element within Block A is considered appropriate, subject to detailed townscape views to ensure it is complimentary to the surrounding context, as well as noting the sites location at a higher level than that consented scheme at Purley Baptist. Officers are of the opinion that any height proposed within this corner will need to be carefully considered alongside the consented scheme at Purley Baptist.

#### *Townscape Impact of Height and Massing*

- 6.26 As highlighted above, there is a need to demonstrate within massing studies that any height within this corner must be of an exceptional quality which respects



and enhances the local character of the area by successfully mediating between the Purley District Centre and the suburban character found north of the site.

- 6.27 Whilst height maybe considered acceptable within Block A (dependent on the points above), Officers have outstanding concerns regarding the proposed height and bulk of Block A combined regardless of the eventual height of the scheme. Officers are of the opinion that the tallest section of Block A should be revised to be a slimmer element at the corner of the site, with a more substantial step down that aligns with the current height of Block B (not as currently proposed being slightly unaligned).

#### *Heritage*

- 6.28 There are several notable heritage assets near to the development: the setting of several heritage assets including Grade II listed Purley United Reformed Church, Grade II listed Purley Library, Grade II Listed Russell Hill Schools Main Building, Webb Estate Conservation Area, Purley Local Heritage Area, Royal Russell School Locally Listed Park and Garden.
- 6.29 The proposed massing has yet to be tested from these points with the latest iteration of the scheme. Officers consider that the height, massing and bulk of the development cannot be fully agreed until this has been provided.

#### *Layout/Form*

- 6.30 The proposed layout and form of development has evolved through the pre-application process, providing breaks between the built form to allow views through the development to the trees to be retained within the site and those prominent street trees seen within Russell Hill Road directly west of the site as well as improving the quality of spaces around the building. Whilst the form of the buildings, being chamfered is not common within the surrounding context, officers are overall supportive of the approach subject to architectural detailing as it allows for improved connectivity through the site, outlook for future residents as well as sensitively intensifying a highly sustainable location.
- 6.31 Block A is noted to be located in close proximity to the public footpaths on both sides which will need to be carefully treated to ensure that it is of human scale so that it interacts within the adjoining public spaces, whilst protecting the amenities of any future occupiers located at lower levels within the building.

#### *Elevational Treatments and Character*

- 6.32 The applicant has begun to reference and consider the context immediately surrounding the site, most notably the parade located on Russell Hill Road. Whilst this may be appropriate for the 'urban' Block A, due to its location at the southern corner facing in part towards Russell Hill Road, Block B and C should seek to respond to the more relevant and immediate suburban context and character on Purley Way and Coldharbour Lane. Notably Block A, has been influenced by 960 Brighton Road (a locally listed building) which incorporates stone detailing, chamfered corners and deep reveals. Officers are strongly of the opinion that significant works are required, at a much finer detail to create a scheme which is truly of exceptional quality which responds to the local character to justify support for a taller element significantly beyond that identified within the

place specific policy already identified. Considering that some elements of the layout of the site and form of the buildings does not respond to the character of the area, it is necessary for the architectural appearance and detailing to show a clear response.



Figure 10: 960 Brighton Road (left), proposed materiality/details for Block A.

- 6.33 The proposed principle of one taller building seen within Block A and two well designed, but respectful blocks which are designed as a ‘family of buildings’ which allow the taller building prominence is considered appropriate. Officers however still consider that further differentiation between Blocks A and B/C is required as the design develops.
- 6.34 Whilst the red brick is seen within the wider area, officers are currently of the opinion that notably within Block A this overcomplicates the massing, form and shape. Alterations to the materiality should to be sought to create clear horizontal banding in the sites urban/suburban context having been further led by a detailed Character Appraisal.
- 6.35 Blocks B and C are currently articulated through two different forms of Brick. Officers again feel the approach undertaken here further accentuates the vertical impact of the scheme and requires revision and is replicated/ throughout all three blocks by the window treatment which also emphasises the building verticality. Officers believed that any proposed design should include stronger horizontal banding to reduce verticality whilst responding to suburban scale and proportions. Again, officers are of the opinion that more work is required in regards to how the proposal responds to the local character of Purley.



Figure 11: Foxley Hatch Public House (left), proposed materiality/elevational treatment for Block B/C.

6.36 Entrances should be clearly indicated as part of the façade approach. At current the proposed entrance treatment on Block B and C across two storeys are not supported. Officers are of the opinion that these should be revised to reflect pedestrian, suburban scale taking into account the existing character and material prompts found on the existing building within the site or immediate suburban context. These include but are not limited to curved entrance doorways, brick treatment, stepped rooflines and planting.

6.34 Given the sites location both fronting onto Purley Way and Russell Hill Road it is considered important that the development incorporates the principles of secure by design.

#### *Ground Floor Activation and Legibility*

6.35 The ground floor of the development is required to host a number of functional uses, such as bin stores and cycle stores. Similarly residential units in close proximity to the street are also problematic. This does provide a challenge in terms of activation. The schemes entrances have been increased in scale for both Blocks B and C and is welcomed however fine grain detail is required to show that the proposed site entrances are activated, legible and welcoming for future occupiers.

### Landscaping, Public Realm & Outdoor Amenity Space

6.36 The applicant has developed an urban to suburban approach to their landscaping scheme, with the southern end of the site being more urban in nature whilst as the site moves north, this becomes more suburban its approach. This results in a variety of spaces, visual connections through the site and play features which utilising the varying topography.



Figure 12: Proposed Section and Indicative Site Layout of play spaces.

6.37 The landscaping approach has developed well, with connection through the site. SUDS appear to be beginning to be integrated into the design at the front of the site which is welcomed but clarification is required around how these work within the proposed site wider drainage strategy. It noted that the proposed flat roofs provided ample opportunity for green roofs to be integrated into the scheme, to further 'green' the proposal and provide improved drainage strategies.



Figure 13: Emerging Landscaping Masterplan.

6.38 A public art strategy will also need to be outlined and developed, and this could help improve the schemes contextuality. Officers are of the opinion that this should form part of the site wider landscaping strategy rather than being a standalone 'piece of public art'.

#### Impact on Neighbouring Properties Living Conditions

6.39 One of the critical considerations for this site is the potential impact of the development on living conditions of existing and potential neighbouring properties. In terms of existing residential properties, the most sensitive is 920 Purley Way, although the residential amenity of those occupiers located within the consented flats at 29 – 37 Russell Hill Road as well those east of the development and which front onto Pampisford Road.

6.40 No recent daylight and sunlight assessments have been provided accordingly and therefore the applicant will need to demonstrate that this proposed relationship as well as with all other surrounding occupiers would continue to protect the amenities of the adjoining occupiers to an acceptable degree.

#### *Privacy, Outlook and Sense of Enclosure*

6.41 The separation distance between the flank elevation of Block C and 920 Purley Way is approximately 7 metres at its closest point. However, owing to the shape of the proposed blocks and potential internal layout of Block C, officers are of the opinion that all primary facing windows can be orientated away from overlooking 920 Purley Way. It is noted that as currently set out a unit within Block C does have potential to overlook the adjoining occupier and would require alterations accordingly to protect the amenities of this adjoining occupier. Alongside this

further clarification is required to demonstrate that this adjoining occupiers retains acceptable outlook.



Figure 14: Eastern elevation (top), Vu-city views of the proposed developments with surrounding consented schemes (bottom)

### Highways and Parking

- 6.42 The site is located on Purley Way, for which TfL are the highways authority. Therefore, they will need to comment accordingly in regards to the acceptability of the impact upon the highway network.
- 6.43 All the car parking spaces to be provided on-site are proposed as wheelchair accessible car parking spaces in line with the draft London plan policies. Given the high PTAL rating, the provision of an otherwise car free development is deemed acceptable. Residents will not be entitled to parking permits and the applicant will be expected to contribute to the further extension of the existing Purley Permit Zone around Russell Hill/Russell Hill Road/More Close to the west of the site as well as a number of other sustainable travel initiatives.
- 6.44 Given the characteristics of Purley Way, and also to ensure that healthy streets and public benefits of the scheme are delivered, notably at the southern tip of the site, a practical servicing strategy will be essential. At current all blocks are proposed to be serviced on-site. The development would require a Construction Logistic Plan, which would be expected to be submitted at draft stage upon application, considering the strategic importance of the road network surrounding the site.

## Trees/Biodiversity

6.45 None of the trees within the site are subject to a tree preservation order, and as such could be felled without further consent. The applicant has stated to date that 24 trees are proposed to be removed across the site (as indicatively shown in figure 13) with the majority of these located within the existing rear gardens of the houses on-site and having little amenity value. It is also notably that the footprint of Block B has been reduced at the rear, so may enable more of the existing trees to be retained since figure 13 was provided.



Figure 15: Existing trees on and off-site (NOTE: proposed block footprint has changed).

6.46 The applicant is proposing to replace those removed with like for like tree replacements. Officers welcome this approach and the consideration of the types of trees to be planted especially within the areas adjacent to Purley Way where they will be provide improved visual amenity to the wider area.



Figure 16: Proposed Tree Strategy

6.47 At this stage it is envisaged that planning obligations will be required to mitigate the impacts of the development. Discussions are forthcoming in relation to the heads of terms, but it is anticipated that these would include the following:

- Affordable housing (on site)
- Affordable housing review mechanisms (early and late stage)
- Employment and Training strategy and contribution (construction)
- Air Quality
- Zero carbon off-set
- Securing potential links to district heating
- Car club (provision and membership)
- Travel Plan
- Car permit restrictions
- Public Realm improvements and maintenance
- Sustainable travel
- Highway works and public realm improvements

## 7 SPECIFIC FEEDBACK REQUESTED

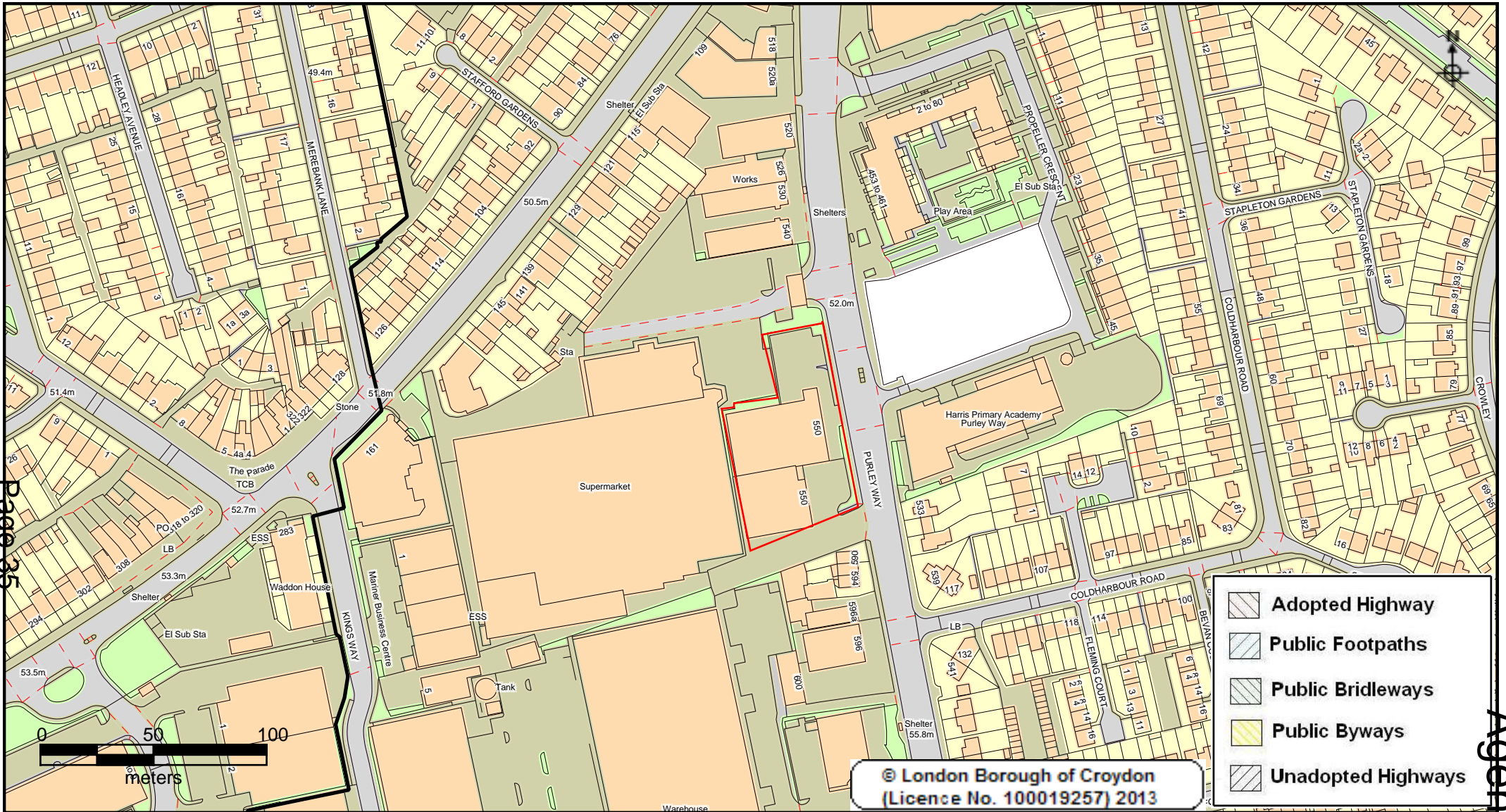
7.1 In view of the above, it is suggested Members focus on the following issues:

- i. The principle of a high density residential development in a PTAL 4/5 location.



- ii. The height and bulk of the development, especially in the context of the Purley place-specific policy, and whether the development can deliver sufficient benefits to justify a departure from policy.
- iii. Whether the proposed design direction and elevational treatment is an appropriate response to its context.
- iv. The emerging landscape design and the increased urban gateway space at the southern tip of the building.
- v. The level of affordable housing and whether an alternative mix to deliver 35% is acceptable.
- vi. The likely impact on neighbouring living conditions and whether alternative BRE daylight/sunlight targets are appropriate.
- vii. Whether a car free development, with disabled parking provision only for the residential component, is acceptable given the PTAL location.

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**PART 5: Development Presentations**

**Item 5.2**

**1. DETAILS OF THE DEVELOPMENT**

Ref: 19/05195/PRE  
Location: 550 to 550A Purley Way, Croydon, CR0 4RF  
Ward: Waddon  
Description: Demolition of existing commercial properties, erection of two blocks, a southern block of 8 storeys, and northern block up to 15 storeys, providing 125 homes including 4 live/work units, with car and cycle parking and associated landscaping.  
Drawing Nos: 6851 DAS, 002 J, 003 F, 005 G, 006 G, 007 G, 008 H, 009 G, 010 G, 013 F, 014 F, 015 F, 016 D, 017 B, 0100, 0102, 0201, 0202, 0203, 0204, 0205, 0206, 0400 B, 0401 B, 0402 A, 0403 A, 0404 A, 0410 A, 0500 A, 0501 A, 0502 A.  
Applicant: Stonegate Homes Limited  
Agent: Nik Smith, Nexus Planning  
Case Officer: Barry Valentine

**2. PROCEDURAL NOTE**

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

**3. EXECUTIVE SUMMARY OF KEY ISSUES WITH SCHEME**

- 3.1 The provision of 125 homes would make a significant contribution to the council achieving its housing targets. The applicant is currently offering 20 units at

London Affordable Rent, and 16 at Intermediate levels, which is a 30% affordable housing offer by habitable room. This offer will be independently reviewed.

- 3.2 The height of the development, whilst in excess of that set out in Croydon Local Plan (2018) policies, has the potential to form a landmark building that will help define the future development of the Purley Way. The eventual affordable housing offer, along with public realm improvements, will need to be balanced against the exceedance of the tall building policies set out in Croydon Local Plan (2018). Whilst further improvement and justification in regards to the quality of living accommodation and external spaces is required, the development does appear to take a logical approach to massing and bulk. Significant design development (including in regards to landscape design) is needed, with the development needing to take a more refined and nuanced contextual response to the site, design and materiality in order to achieve exceptional design.
- 3.3 The quantum of car parking provision is a fine balance between promoting sustainable modes of transport, and not leading to a development which causes significant levels of parking stress, which in turn either compromises the quality or leads to highway safety issues. Increasing the ratio of space to units is likely to result in the loss of units, which in turn may effect viability and affordable housing provision.

#### **4. SITE BRIEFING**

- 4.1 The site subject to the pre-application lies on the western side of Purley Way (A23), 150m south of Five Ways junction, and opposite Harris Primary Academy Purley Way. The site currently consists of two large approximately two storey A1 retail units, which are currently occupied by Halfords and Natuzzi. Parking is located to the front of Halfords store, and to the northern side of Natuzzi. Vehicular and pedestrian access to Halfords is from a shared private road at the southern end that also serves the goods entrance to Wing Yip. Natuzzi store vehicular access is from the centre of the site.

### Neighbouring Buildings

The site is situated in a built up area and is surrounded by buildings of differing scale and use.

#### Morrisons

The warehouse, where Morrisons now reside, was an Iron Foundry built in the 1920s.

#### 1930s Row of Houses

The houses are located fronting onto Stafford Road.

#### 153,155 Stafford Road

A modern flat complex was completed in 2017 and is located adjacent to the 1930s houses.

#### Wing Yip

Is a large and widely recognised oriental grocer, with a newly extended warehouse and parking facility.

#### Old Tithe Barn

This building is Grade II listed and is currently used as a place of worship.

#### Waddon Leisure Centre

The Leisure Centre opened in January 2013, forming part of the Waddon Masterplan.

#### Harris Primary Academy

The school opened in 2016 forming part of the Waddon Masterplan.

#### Cottages

The Cottages are adjacent to the south boundary and used for residential purposes



Fig 1 – Site Location Photo (site outlined in red and Wing yip outlined in green)

- 4.2 The area has a mixed character that features two storey residential properties immediately to the south, a seven storey high newly created (as well another building under construction) residential development and school on the opposite (eastern) side of Purley Way, with commercial/industrial uses located to the south, west and north.



Fig 2 – Google Earth 3d image of the site looking west

- 4.3 The site has a PTAL (Public Transport Accessibility Rating) rating of 3 and Purley Way is a classified Red Route.
- 4.4 The sites lies within the Tier II ‘The Mere Bank Archaeological Priority Area’. The Mere Bank was a raised earthwork or dyke which ran in a north south direction between Waddon and Purley, and possibly extended further north into Mitcham Common. The APA has potential for prehistoric finds, and finds related to Croydon Airport.

4.5 The site is located within an area at Flood Risk Zone 1 (low) and is at High Risk (1 in 30 years) from Surface Water Flooding. The site is located in an area where there is potential for groundwater flooding to occur at surface.



Fig 3 – Photos of site

4.6 The application site is not located within a designated conservation area, nor is the building statutorily listed. The development would not impact the setting of any adjacent conservation areas, but it is likely to impact the setting of Grade II listed Old Tithe Barn, Waddon (520 Purley Way), which is to the north of the site.

4.7 The application site is located within the boundary of the emerging Purley Way Masterplan and Local Plan Chapter which identifies this site as part of an area for transformation.

4.8 There is a moderate slope across the site, which slopes south to north.

4.9 The site lies within the Place Specific Policy Area of Waddon (Policy DM49). Whilst the site itself is not allocated, the adjacent Wing Yip site which surrounds the site on its northern, western and southern sides, is allocated in the Croydon Local Plan (2018) as follows:

350: Wing Yip, 544 Purley Way

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Waddon	CR0 4NZ	1.53ha	Wing Yip retail warehouse & car park	Urban	Medium	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community		<p>Potential for a new Local Centre in the Five Ways area of Waddon is identified in the Croydon Local Plan 2018. Over the lifetime of the Croydon Local Plan, reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential and retail use alongside new community and leisure uses. As the site is a scattered employment site, the employment use will need to be retained as a mitigation of the potential loss of employment and as part of any redevelopment, enable inclusion of attenuation SuDS where possible.</p> <p>Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'</p>			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	69 to 260

Fig 4 – Wing Yip Site Allocation in Croydon Local Plan (2018)

### Relevant Planning History



4.10 Relevant planning history for this and adjoining sites is as follows:

Planning permission reference 84/01000/P was granted on the 13/07/1984 for the 'Use of premises for the sale of car and motor cycle components.'

Planning permission reference 84/02481/P was granted at appeal for the 'Use as a retail showroom for sale of leather furniture.'

Planning permission reference 04/01414/P was granted on the 09/12/2004 for the 'Variation of condition 2 of planning permission 84/1000/P to allow the sale of furniture, carpets, floorcoverings and electrical and gas products and any other goods which are related and ancillary to the main goods permitted.'

Planning permission reference 04/03573/P was granted on the 20/01/2005 to the Halford's store for 'Alterations to include recladding and installation of mezzanine floor.'

*Proposal*

4.11 The proposal is currently for the demolition of existing commercial properties, erection of two blocks; a southern block of 8 storeys, and northern block up to 15 storeys, to provide 125 homes including 4 live/work units, with car and cycle parking and associated landscaping.

4.12 The taller element at 15 storeys, sits at the northern end of the site, and has a north south axis that runs parallel to the Purley Way. On the southern side of the site is an 8 storey element, which is located at angle to road, running in a south east to north westerly direction. The two towers are connected with a continuous frontage at ground/mezzanine floor level, with a further set back link at first floor level. To the front of the site at its southern end there would be an enlarged public realm, which is approximately 8.5m wide (11.5m wide including existing pavement).



Fig 5 – 3D CGI of proposed scheme

4.13 At ground floor level at the northern end of the site is the work element of four live/work units, with 'live' element at mezzanine level. Adjacent and looking into the newly created enlarged public realm is ancillary residential space, which sits over ground/mezzanine levels, which is intended to provide breakout, work space and meeting rooms for the residents. To the rear sits a car park for the residential units, which is accessed by a shared service road that runs along the southern boundary. Cycle and refuse stores, with the latter collected from the car park area, also occupy the ground floor level. Residential units are located at first floor level and above. To the western rear edge of the site, principally above the car park area on a newly created podium, sits a communal external amenity space.

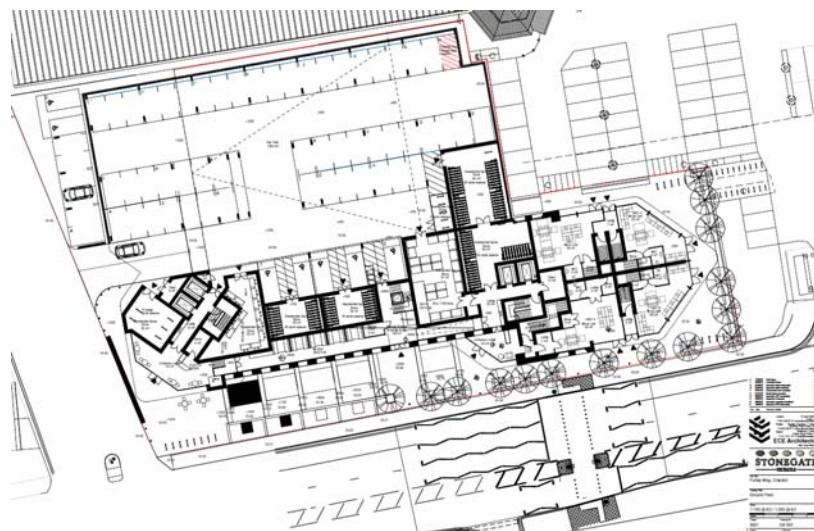


Fig 6 – Proposed Ground Floor Plan

4.14 The proposed residential element is made up of twenty six 1 bed 2 person homes, one 2 bed 3 person homes, sixty seven 2 bed 4 person homes, thirty 3 bed 5 person homes and one 3 bed 6 person homes.

4.15 It is understood that the applicant is intending to submit their planning application by the end of the year.

## 5. PLACE REVIEW PANEL FEEDBACK

5.1 An earlier iteration of the scheme was presented to the Council's Place Review Panel (PRP) on 19<sup>th</sup> March 2020. The scheme has significantly evolved since the PRP and it is intended to take the scheme back for a second review following this committee.



Fig 7 – Scheme presented to PRP

5.2 The Panel's main comments were:

- Stressed the importance of engaging with the development of the Purley Way Masterplan. The panel hoped that the emerging Purley Way Masterplan could inform aspects of the design, such as access, building height, street frontage, land use etc. through the development of a wider strategic context. Currently the proposal is isolated and more prone to criticism due to the lack of context. The panel understood the justification for the height proposed at present, as a marker for a transition from the Strategic Industrial Land to a more residential area of Croydon. They felt the proposal should be considered as the corner of a much bigger site. Height, massing, and scale were noted as being quite different to the surroundings, which was not necessarily felt to be a bad thing. The panel recommended exploring a lower rise, compact development option as an alternative.
- It was felt that there were strategic moves in the planning of the scheme which were at that stage yet to be resolved, such as the proximity to the adjacent Wing Yip site.
- It was felt that without the context of the masterplan, the justification for the height of the development will have to be well made, which may be made, for example, through bringing on board a high quality commercial

space with an innovative operator, and providing a high amount of affordable housing.

- Raised that commercial spaces under residential developments are often not let because they are badly designed or the wrong use class. It was felt that this was a vibrant commercial quarter on a very busy road, so a commercial use in this location could work, and could act as a destination point, which may help justify the height of the development.
- The panel felt that the design was overcomplicated. They felt that the complexities should be designed out to drive better quality in the rest of the scheme. The form and material approach should undergo simplification, with former be informed by wider masterplan developments. They felt there was a need for a higher proportion of dual aspect units, and a greater rationality to the apartment types.
- Stressed the importance of getting the design of the podium right. It might be through a gesture towards the ground, which could be quite complex, or the podium offered as a great garden space, separated from the noise and bustle of the Purley Way.

### 5.3 The scheme has evolved in response to PRP's comments as follows:

- The developer has engaged as far as reasonably possible in helping the development of the Purley Way Masterplan, including having met the project team to discuss their site, their proposals and challenges they have faced. This has been of great help to the project team associated with the masterplan. However, both the new Local Plan policy and the Purley Way Masterplan are still at development stages where they cannot be widely shared, including to the developer. It should be recognised that in officers view given the limited land use restrictions, and the need for housing, that the site in question is a potential development site irrespective of the Purley Way Masterplan formulation and hopeful future adoption.
- The applicant continues to test the height in a range of views, and shaped the form of the development so that it more comfortably responds to the context, although further more rigorous testing is still required. The applicant has altered the orientation of the southern block so that it engages with the ground and corner of the site better, and allows smoother transition in scale. There is also greater spacing from the Wing Yip site. The applicant felt that they had already previously explored a compact lower height development, but this was discounted on the basis of unit numbers and/or that compacted form reducing light entering into spaces between buildings.
- The design has been simplified in line with PRP advice, both in form, fenestration and materiality.
- Commercial units, with the exception of work/life spaces, has been removed from the proposal. This in part due to lack of space, heavy servicing/parking demands, and in order to make the scheme simpler in line with PRP advice. Many of the commercial uses explored were not policy compliant.
- The podium has evolved in order to provide residents with additional communal space, to act as an appropriate pleasant green space away

from the busy Purley Way. Further development however is still required in its design and landscaping.

## **6. SUMMARY OF MATTERS FOR CONSIDERATION**

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

- Land Use
- Height, Bulk and Design
- Impact on Neighbouring Properties Living Conditions
- Highway and Parking
- Trees/Biodiversity

### Land Use

#### *Residential Use*

6.2 The London Plan sets a minimum ten year target for the borough of 14,348 new homes over the period of 2015-2025. The Croydon Local Plan (2018) sets a minimum twenty year target of 32,890 homes over the period of 2016 to 2036. The proposed development would create additional residential units that would make a significant contribution to the borough achieving its housing targets as set out in the London Plan (2016) and Croydon Local Plan (2018).

6.3 The Draft London Plan is nearing adoption, the Mayor of London in his 'Intend to Publish London Plan 2019' sets a 10 year target for Croydon of 20,790 homes. The Draft London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on sites with high PTAL (3 to 6).

6.4 The site with its PTAL rating of 3 (in line with H1) has good access to public transport, local shops and services and is therefore reasonably well placed for high density residential-led development.

#### *Commercial Uses*

6.5 The existing A1 retail uses, as they are not located within a designated town centre, are not protected, and therefore no objection is raised to their loss.

6.6 The live/work units would provide some employment opportunities. In addition the communal spaces will help support residents to work from home. Conditions and restrictions through the legal agreement will be required to ensure that the work element of live/work units is marketed, retained and managed in an appropriate way. The current design of the live/work units are as duplexes which directly conjoin the work and live elements. This greatens the risk of tenants using the workspace element as living space / residential conversion. Residential use at the ground floor of the scheme will be unacceptable owing to the poor conditions of the Purley Way (caused by heavy traffic), and the close proximity of the proposed building to the road. It will also create inactive frontage within an areas where an emerging new centre is being proposed (as part of the Purley Way Masterplan), so careful controls will need to be in place as well as active marketing to ensure the units are occupied.

### *Affordable Housing*

- 6.7 Policies SP2.4 and 2.5 of the Croydon Local Plan (2018) set out that a minimum of 50% of units must be secured as affordable housing on sites of ten or more homes. Policy seeks a 60:40 tenure split between affordable rented homes and intermediate (including starter) homes, unless there is agreement between Croydon Council and Registered Provider that a different tenure split is justified. The split seeks to provide a range of housing types to help ensure the creation of mixed and balanced communities.
- 6.8 The applicant has submitted an affordable housing offer of 29% by unit and 30% by habitable room, with 20 units provided at London Affordable Rent Levels, and 16 units at Intermediate tenure. With this offer the applicant claims that there would be a deficit of £1.89 million from the benchmark land value. It should be noted that the affordable housing offer was upped on the 01/10/20 from an initial offer of 15%, at a 60:40 split. Due to the recentness of this revised offer the independent review of the viability assessment has not been completed.
- 6.9 It is officers' opinion that the affordable housing offer is the central part of whether a tall building in this location could be supported, and a reduction in offer would fundamentally change the balance consideration of the application.

### *Unit Mix*

- 6.10 Policy SP2.7 sets a strategic target of 30% of all new homes up to 2036 to have three beds or more. SP2.5 states the Council will seek to ensure that a choice of homes is available in the borough which will address the borough's need for homes of different sizes. Policy DM1 of the Croydon Local Plan (2018) requires developments located within an Urban Area with PTAL 3 to provide 60% of the units as three bedroom or larger. Policy DM1 does outline some exceptions where this quantum of larger units would not be sought. These exceptions are as follows:
- a) Where there is agreement with the associated affordable housing provider that three or more bedroomed dwellings are neither viable nor needed as part of the affordable housing element or any proposal, or
  - b) Within three years of the adoption of the plan, where a viability assessment demonstrated that larger homes would not be viable, an element may be substituted by two bedroom, four person unit comply with the floor space specifications of national Technical Standards or the London Mayor's Housing SPG or equivalent.
- 6.11 At present 25% (31 homes) would be three beds, and 54% would be two bed four person (67 homes). This includes live/work units. The proposal would be policy compliant if the exceptions outlined in the policy above are met.

### *Quality of Residential Units*

- 6.12 All of the proposed residential units meet minimum floor space standards set out in the London Plan (2016). There are a couple of exceptions where the proposed development does not meet private amenity space standards. It is understood

that the applicant is targeting full compliance and will develop the design further so that this is achieved.

6.13 The Mayor of London Housing SPG advises that developments should minimise the number of single aspect dwellings, and that north facing units should be avoided. North facing is defined as having an orientation less than 45 degrees, either side of north (i.e. between north west and north east).

6.14 There are a number of single aspect units, six of which are north facing. It is not clear how the applicant has sought to avoid north facing units as far as reasonably possible, nor sought to minimise the number of single aspect units through the design and form of the building. However, officers do accept that in order to maximise the potential of the site, due to its shape and orientation, specifically its narrow shape at its northern end, a certain quantum of the units would inevitably be single aspect. Further work and justification by the applicant on this is required.



Fig 8 - Plan indicated the single aspect units which are either not north facing (yellow dot) or which are north facing (red dot) on typical floorplan.

6.15 A sunlight and daylight assessment has been submitted as part of the pre-application. However this is not complete and only measures up to first floor level. From the limited information provided, all but two rooms appear to have acceptable average daylight factor values, but there are a significant number of living/kitchen/dining rooms that do not meet BRE sunlight guidance. A more comprehensive sunlight and daylight assessment is required, as well as further justification submitted in regards to the orientation of units which accounts for the breach of BRE sunlight guidance.

6.16 In terms of privacy between the units, good window to window relationship are achieved, with the closest point the two buildings being 13m apart. Windows are angled away from each other so as not to result in direct overlooking. Care will be needed in the design of some walkway areas and terraces to ensure that

privacy of the units is safeguarded. The work element of the live/work units is also located purposefully at ground floor level in order to prevent privacy issues which can be problematic when key residential rooms are located at ground level. Concern, however, is raised regarding the mezzanine residential level being fully glazed.

- 6.17 In terms of noise, the development will also need to adopt the 'Agent of Change' philosophy given its close proximity to the busy Purley Way and given the location of adjacent strategic industrial land, placing the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new development. Through appropriate design measures, supported by a robust noise impact assessment, it is expected that this can be demonstrated upon application.
- 6.18 Given the site's location adjacent to the Purley Way, air quality within the units and communal spaces will be a critical factor. A detailed air quality assessment will need to be submitted with the application, with measures such as winter gardens and mechanical ventilation likely to be required.
- 6.19 Further details on the quality of communal amenity space provision will be required to ensure that it is adequately lit, well designed, and accessible and contains high quality child playspace in line with policy.
- 6.20 In regards to accessibility, London Plan Policy 3.8 'Housing Choice' requires 90% of dwellings to meet M4(2) 'accessible and adaptable dwellings' Building Regulations requirement, with the remaining 10% required to meet M4(3) 'wheelchair user dwellings'. It is understood that the development would comply with these policy requirements, but it is unclear at what mix in terms of bedroom types and tenure.

### Height, Bulk and Design

#### *Policy Principle of Height*

- 6.21 Croydon Local Plan (2018) Policies SP4, DM15 and Place Policy DM49: Waddon are the most relevant policies for considering the principle of a tall building in this location.
- 6.22 Paragraph 6.9 states 'In the context of this policy (i.e. SP4 – key extracts below) is one that is significantly taller than most of the surrounding buildings or in excess of six storeys or 25m.'
- 6.23 Paragraph 6.152 in regards to policy DM15, states 'Tall and large buildings have been defined as those which are significantly taller and larger, in terms of scale, mass and height than the predominant surrounding buildings, causing a significant change to the skyline.'
- 6.24 Paragraph 6.153 states 'When assessing whether a development can be considered to be tall or large, the context within which the building is situated must be taken into account. This would mean that a proposal for six storeys, in



an area where predominant building heights are two storeys, would be considered to be a tall building. In an area where an urban block comprising with narrow frontages, a proposal for a building with a scale that differs from this would be considered to be large.'

6.25 Policy SP 4.5 states:

*“Proposals for tall buildings will be encouraged only in the Croydon Opportunity Area, areas in District Centres and locations where it is in an area around well-connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or District Centres. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and/or in District Centres, will be contained in the Croydon Local Plan’s Detailed Policies and Proposals. Furthermore the Croydon Opportunity Area Planning Framework should be referred to when considering the location and design of tall buildings in the Croydon Opportunity Area.”*

6.26 The site is not within the Croydon Opportunity Area, nor does it lie within a District Centre. However, it is situated within an area of transformation within the emerging Purley Way Masterplan and officers do consider the site to be well connected, with its PTAL rating of 3, and convenient transport links into Central Croydon.

6.27 SP 4.6 states:

*“Some locations within the areas listed in SP4.5 will be sensitive to, or inappropriate for tall buildings and applications for tall buildings will be required to:*

- a. Respect and enhance local character and heritage assets;*
- b. Minimise the environmental impacts and respond sensitively to topography;*
- c. Make a positive contribution to the skyline and image of Croydon; and*
- d. Include high quality public realm in their proposals to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area”*

6.28 The above criteria will be considered in further depth within the rest of this report. In conclusion, it is considered that there is a reasonable prospect that a tall building in this location could meet the requirements of the policy.

Policy DM15 states:

*To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they meet the following criteria:*

- a. They are located in areas identified for such buildings in Policies DM34 to DM49;*
- b. They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4, with direct public transport connections to the Croydon Opportunity Area;*

*c. The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale;*

*d. The building height, footprint and design relates positively to any nearby heritage assets, and conserves or enhances the significance and setting of the assets of the wider historic environment;*

*e. To improve the quality of and access to open space, developments including buildings taller than 40 storeys will need to incorporate amenity space, whether at ground level such as atria or above ground level, such as sky gardens and roof terraces, that is accessible to the public as well as residents of the development; and*

*f. To ensure tall and large buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm.*

6.29 In terms of the policy, a fifteen storey building would be considered a tall building and as such the above policies are applicable, and the development would run contrary to those policies. Other 'tall buildings' that do not meet the policy requirement (although notably smaller than proposed) have been approved in the vicinity of the site that are up to eight storeys. The site is situated within the emerging Purley Way transformation area which, as highlighted within the Local Plan Review: Issues and Options, will help towards the borough's housing target. Evidence may come forth through the masterplan that may also support the provision of taller buildings than currently found within the local area, albeit the development of the masterplan is still at its preliminary stages and this cannot be given any significant weight.

6.30 It is important that the Croydon Local Plan is read as a whole, and that failure to comply with a single policy within the plan would not necessary lead to a sustainable reason for refusal. In order to justify the departure the council will need to be satisfied that the development is able to demonstrate clear benefits that actively and incomprehensively outweigh the areas of non-compliance.

#### *Heritage*

6.31 In terms of impact on heritages asset, the main impact is likely to be on setting of the Grade II listed Old Tithe Barn. The applicant will submit a heritage assessment with the application which will set out the significance of the asset, as well as consider the impact on the asset. It is acknowledged that the setting of Old Tithe Barn has been compromised by existing built form around it. Whilst the development would cause some harm to the setting of this listed building, principally because of the impact on views from the north with the development in the background, the harm is likely to be minor. Officers feel that it will likely be possible to justify this harm through public benefits that the scheme can derive. A more comprehensive townscape and views testing is required.

6.32 It is understood the application will be supported by archaeological appraisal. Greater London Archaeological Appraisal Service of Historic England would be consulted at application stage.

#### *Massing Approach/Layout/Form*

6.33 The proposed tower would form a prominent landmark building, marking the entrance to emerging Five Ways local centre. The building has the potential to add character and visual interest that would be valuable to help create a sense of place, while also informing the future development of Purley Way. A basic model analysis has been provided by the applicant; see extract below. A more detailed and through analysis, including contextual rendering, is advised to be submitted upon application so a full picture of impact on the townscape and long range views can be formed.



*Fig 9 – Views from Applicant's model looking north and south*

6.34 The reduced height of the southern tower compared to the northern tower allows a smooth transition in scale in long views from the south. The strong differentiation in height combined with both elements being set at different angles, allows a visually pleasing differentiation that helps break up the massing, whilst also preventing a canyon effect. The irregular shapes of the buildings adds further interest, whilst also helping to soften the edges of the development, reducing the visual impact of the massing.



Fig 10- CGI of the proposed development taken at street level

- 6.35 The southern tower successfully grounds itself much better compared with previous iterations by virtue of its angle, and its set back cantilevered entrance level. A continuous frontage connecting the two towers helps created a defined urban edge and setting to the enlarged public space.
- 6.36 The locations of the buildings, and placement of height at the northern end should ensure that units and private communal areas receive good levels of sunlight and daylight.
- 6.37 The 'link' building between the towers has progressed positively and its form has been rationalised to simplify the form, and address awkward pinch points at the first floor that previous iterations created.
- 6.38 Officers do have some concerns over the sloped roof form of the tallest tower, as it adds further complication, and is somewhat out of character with other tall buildings, including those on the opposite side of the street in Croydon that tend to have flat roofs.
- 6.39 London Plan (2016) policy 3.4 outlines what it considers to be appropriate density of development based on urban type and PTAL rating. The London Plan outlines that this table should not be used mechanistically. This policy should also be used with some caution as it is proposed to be removed under the emerging draft London Plan. For an urban area with PTAL rating of 3, it recommends that development has between 45 to 170 units per hectare. The proposed development is calculated as having 337 units per hectare. This must be considered against a design-led approach (which the emerging draft London Plan endorses over the density matrix) in an area of transformation within the emerging Purley Way Masterplan.

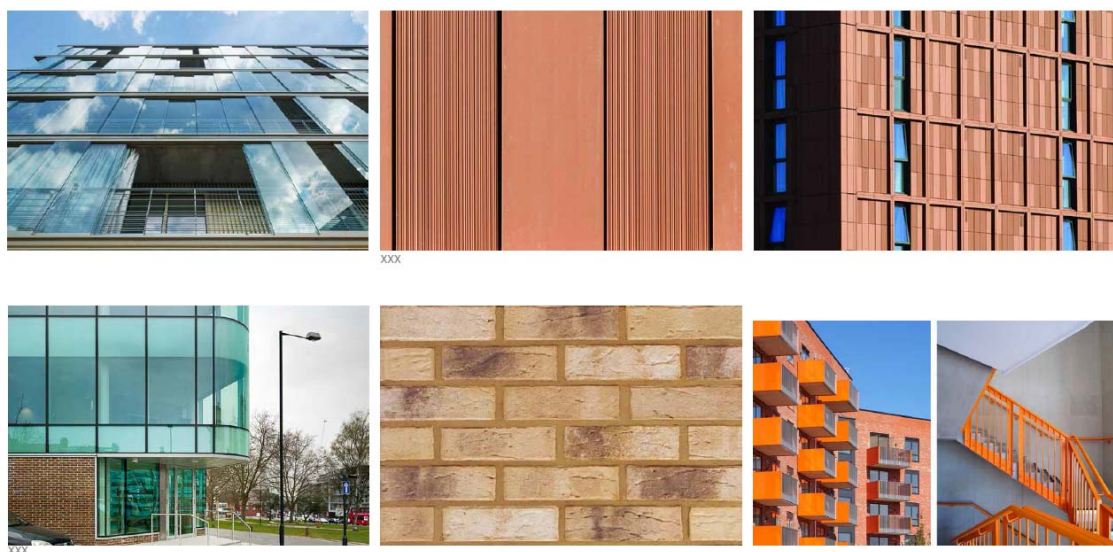
*Elevational Treatments*

- 6.40 The elevations since the PRP have been on the whole successfully simplified, with a more logical and calmer fenestration pattern that also makes features of the balconies. The material treatment of the building has continually changed since the PRP, with a range of materials explored by the applicant from using different tones of brick to the current iteration that proposes a brick base and terracotta panels. For each of these iterations the applicant has not provided a clear strategy that demonstrates how local character and heritage has informed material choices.



Fig 11 – Images showing design development

6.41 Officers do have concerns about terracotta, as it is not clear how this relates to or has been informed by the existing context and lacks a clear design narrative. The precedents provided to date are of a questionable design quality and do not appear to have been critically analysed. Many of the examples are taken at close range, and it is not clear whether these work on a grander scale. Terracotta is very varied material and can have rich interesting detailing, however the panels shown on submitted CGIs lack variation in tone, texture or detailing. They could give the building quite a commercial appearance, which would be at odds with the residential nature of the intended use and could potentially exaggerate the massing. It is expected that the applicant will further develop their proposal and the scheme presented to committee be more refined than versions presented to date to officers.



*Fig 12- Appearance and Material Precedents Provided by Applicant*

*Ground Floor Activation and Legibility*

6.42 The work element of the live/work units at the north have been designed with large continues glazed elements, not only to prevent them being easily converted to residential in the future, but also to help provide a level of activity. Although this is a positive design decision, there is still a risk that tenants may cover the glazed façade to enable the reversion of the work space to residential use, potentially creating a messy and inactive frontage. Therefore previous comments around marketing and management of the live/work are still vitally important. Concerns are also raised regarding the practicality of having a fully glazed mezzanine level for the live element.

6.43 At the southern corner is the main lobby area for the southern tower, which adds activity on this prominent corner. Flanking the public space within the connecting element there would be double height space with communal residential areas that are intended to provide work space for residents within the block. This is both a response to changing work patterns, but also to help provide activity. Inactive uses, such as cycle stores and refuse, have been placed centrally within the building and serviced from within the site, to help create an active frontage. However the layout of this communal work space appears compromised and

narrow with poor access. This is primarily caused by the quantum of parking, bin stores and cycle parking, needed to support the proposed number of residential units.



Fig 13 – CGIs showings public realm and internal double height internal communal work areas.

#### *Landscaping, Public Realm & Outdoor Amenity Space*

6.44 Positive strategic moves have been made through the design, such as ensuring servicing can take place within the development. This should help create a solid foundation in which a visual pleasing and stimulating public realm and landscaping can be created and start the move away from the current vehicular dominance of the Purley Way.

6.45 At this stage landscaping proposals are quite basic, with spaces in around building lacking a clear contextual narrative or purpose. The latter is problematic given the harshness of the current Purley Way environment and the need for this space to offer a genuine public benefit that can be used to justify the proposed height of the development and support the scheme being a gateway into the emerging Fiveways centre. The landscaping within the public realm, combined with structures such as bicycle stands within it, have not quite achieved a successful balance between creating a permeable green buffer for pedestrians walking through, but also a successful barrier to prevent vehicles entering into this space in an inappropriate manner as can be witnessed in properties opposite. At the moment the landscaping appears too defensive and blocks access for pedestrians which undermines a welcoming engaging public

environment that helps embed this development into its context. The layout of components appears cluttered and creates unnecessary barriers for pedestrians. It is also not clear how the space has been designed to respond to and improve microclimate conditions. Officers have recommended that the applicant seeks inputs from a landscape designer to deliver a clear landscape and public realm strategy which identifies a detailed material and planting palette and layout plan. This should clearly demonstrate a response to local character, complement the building design, and support the function of the different spaces across the scheme.

Impact on Neighbouring Properties Living Conditions

- 6.46 The applicant has submitted a sunlight and daylight assessment, which has been carried out in accordance with BRE guidance. The submitted study demonstrates that the proposed development will not cause an unacceptable loss of sunlight or daylight to existing neighbouring properties.
  
- 6.47 In terms of Vertical Sky Component (VSC) test, there are only three minor failures to surrounding existing residential properties, a window on nos. 453 to 461 Purley Way, and two flank windows located on the side elevation of no.590. The failing window on nos. 453 to 461 is a bedroom window located at third floor level highlighted below. This window would experience a ratio reduction of 0.7, compared to 0.8 target recommended. The bedroom window sits recessed within a balcony, which makes it overly sensitive to change. BRE notes that guidance should be applied more flexibly in such instances. Officers consider that this bedroom would retain good levels of daylight, and that the marginal breach in VSC value to this window is acceptable. The failing windows on no.590 are located on the flank elevation, but both these windows would retain VSC values in excess of 23%, which is considered good, especially given their location on a flank elevation which makes them reliant on light coming over the applicant’s site. There are currently no known sunlight failures to existing residential properties, but there are failures noted in properties that are currently under construction (see paragraphs below).

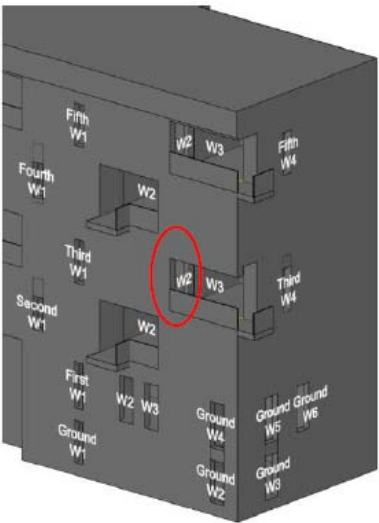


Fig 14 - Showing location of affected window within nos. 453 to 461.

6.48 Opposite the site is no.459 Purley Way, which is currently under construction, but appears to be close to completion. On the basis that this scheme has not been completed or occupied, the applicant has used Average Daylight Factor (ADF) test that applies to new units. Under this test, and once the impact of the balconies has been removed, the applicant states all rooms would achieve 100% compliance. Officers have expressed some reservations over the use of ADF, given that no 459 is close to completion. We have asked the applicant to further justify the impact in terms of VSC/NSL, in the event that circumstances at 459 have changed upon application.



Fig 15 – Showing flank windows of no.590

In terms of sunlight there appears to be two notable failures at 459, but the precise windows and their location are not known. Further information is required on these before further judgements can be made. There is no significant overshadowing of neighbouring gardens due to orientation of the site in comparison to surrounding residential properties, separation distances and nature of surrounding uses.

6.49 In conclusion, at this early stage of the scheme's development it appears to have an acceptable impact on existing properties' sunlight and daylight. The applicant needs to provide further information and justification of the impact on no.459 Purley Way, and the need for this in part will be based on the status of the site at the point of the application's formal determination.

#### *Privacy, Outlook and Sense of Enclosure*

6.50 The separation distance between the south elevation of the southern tower and no. 590s' boundary would be 15.5m. The separation distance ensures that there is not an unacceptable loss of privacy, or unacceptable loss of outlook/sense of enclosure, to either no.590s windows or garden. Care will be needed on the design of terraces on the podium to reduce overlooking and ensure good neighbourly relationships. There is a separation distance of over 30m between the towers and properties on the opposite side of Purley Way.

#### Highways and Parking



- 6.51 The proposed development has the potential to significantly improve the public realm to the front of the site, which would improve the pedestrian environment and is therefore welcomed.
- 6.52 Servicing for the development would be done from within the site's car park which is fully supported. Swept path analysis has been undertaken to show that this is feasible. Servicing from within the site will both ensure high quality public realm to the front helping to promote healthy streets, whilst also ensuring that the operation of the highway, including key bus routes, is not compromised. Officers have expressed some concerns about the lack of servicing and parking for visitors or clients associated with the workspace element of the live/work units as this could affect the marketability and function of these components.
- 6.53 A critical consideration is the level of car parking provision that the development would provide, as it will need to maintain a balance between promoting sustainable modes of transport, but not lead to significant levels of parking stress, which in turn either compromises the quality of development or leads to highway safety issues. The aforementioned issues can already unfortunately be witnessed on the other side of the street, where cars mount the pavement to park in open area in front of nos. 453 to 461.
- 6.54 Census data indicates that car ownership for flats in the ward is 0.56 cars per unit. This would suggest that the development would generate a total parking demand of 70 vehicles. The applicant has also carried out a parking survey, which was taken during the standard weekday night, as well as during the day. The survey area is shown below:



Fig 16- Parking Survey Areas

6.55 The surveys shows the following:

- During the overnight (00:30) parking beats, the overall parking stress across the study area was recorded between 66-68%, with some 64-67 available spaces;

- During the daytime parking stress levels across the study area were observed to be between 62-68%, with some 64-76 available spaces;
- Kings Way recorded consistently high (over 85%) parking stress across all time periods; and
- Queensway recorded a reduced parking stress in the overnight parking beats (43% across both days) and evening (64%) compared to the daytime parking stress of 79% and 86% recorded at 10:00 and 14:00 respectively.

6.56 The survey data is set out over 500m, which is considered too large given the severance effect of Purley Way and the Lambeth methodology states 200m. As a result it is difficult to interpret the data provided by the applicant, but it appears to show that parking stress across the area does vary, but there is some evidence, both within the parking survey and from on site observations, that roads most convenient to the site have a high level of parking stress. This would suggest a more conservative approach to car parking provision on the site may be appropriate.

6.57 The proposed development is proposing 66 car parking spaces, 4 of which would be designated for the live/work units. 7 of the car parking spaces would be designated as Blue Badge parking spaces. 20% of the car parking spaces will be installed with active electric charging vehicle provision, with the remaining 80% passive in line with Draft London Plan standards. There would therefore be 0.53 car parking spaces per unit. The applicant's justification for this level of provision is as follows:

- There is an increasing demand for apartments without car parking provision. This market is supported by younger generations who have different attitudes to car ownership;
- The site is in an accessible location to public transport with bus stops within 150m of the site on Purley Way. This will contribute to lower levels of car ownership and use;
- Waddon Railway Station is some 700m walk from the site. This offers direct and frequent services to destinations including London Bridge, London Victoria, Epsom, Sutton and Croydon;
- The site is a mixed use development and services and facilities will be provided as part of the development. The site is also located within a 'comfortable' walk of a range of services and facilities to cater for everyday needs;
- 49% of households living within flats and maisonettes are car free within the ward where the site is located. This demonstrates the existing market for car free dwellings; and
- To further encourage occupants of the proposed development to adopt more sustainable travel patterns, a Travel Plan will be produced.

6.58 In addition in order to support the proposed level of parking space provision, officers have asked the applicant to explore the provision of a car club bay in the external parking spaces at the southern end of site. It has been calculated by COMO (charity supporting sustainable modes of transport) that for every car club

vehicle, it leads to a removal of 10.5 private cars from the road network. Officers welcome members view on the unit to car parking space provision. However, it is important to note that if member's direction is to increase the level of parking provision per unit, the most likely responses to that will be to either drop unit numbers or increased building costs, which in turn could potentially reduce viability. It should also be noted that TFL/GLA will be a statutory consultee on the application and generally seek a low level of car to unit provision.

- 6.59 Pre-application discussion with TFL have been undertaken given the site's location on a red route. Many of their comments have been taken into account in the scheme, including the loss of on street/within the public realm servicing bay. TFL have also accepted the unit to parking space ratio. They have requested a Parking Management Plan, which would be securable via condition.
- 6.60 Officers have expressed concerns regarding the location, pedestrian route to the building and visibility of cars reversing out of the space from the disabled parking bays located at the south western corner of the site.

#### Trees/Biodiversity

- 6.61 There are no known trees on the site which could be impacted by the proposed development. There is a significant potential through landscaping to provide substantial tree planting, which could help make significant contribution to the public realm and the quality of communal amenity space being provided. In addition, there is also potential for substantial increase in urban greening. This could be a potential significant benefit to the scheme, but to date, the applicant's landscaping proposal are not sufficiently developed to ensure that benefit is fully realised. A more nuanced and detailed approach to landscaping is required and is expected to be developed by the applicant prior to application.

#### Other Considerations

- 6.62 An initial desktop based wind study has been provided which has identified several areas in which the scheme needs to further develop in order to ensure good standards of wind conditions. It does not appear to have accessed the wind conditions within the newly created public realm. Measures identified that may be required include:
- Wind conditions on the footpath are currently (under the existing condition) only suitable for strolling. Further mitigation in the form of additional landscaping along the footpath may be required.
  - Some further mitigation at the entrances of the southern building may be required.
  - Wind on the external amenity spaces at podium level, level 2 and at 12<sup>th</sup> floor level may exceed sitting comfort levels. Mitigation in the form of horizontal shielding and windbreaks, and increased balcony balustrade heights are likely to be required.

- Upper level balconies are likely to exceed sitting comfort conditions, so mitigation measures in the form of louvres, screens or winter garden is likely to be required

6.63 The submitted wind study at this early stage is relatively basic, and more detailed testing, including wind tunnel testing, will be required upon application. Clearly the factors above will need to be factored into the design and elevations going forward.

6.64 Major residential schemes are required to meet Zero carbon. Non-residential buildings should achieve a 40% carbon dioxide emissions reduction over the Target Emissions Rate (TER) set out in the Building Regulations (2010). The London Plan Sustainable Design and Construction SPG (2014) sets out that this is broadly equivalent to a 35% reduction over the 2013 Building Regulations Part L, which is the most up-to-date standard.

6.65 All major developments are required to provide a Flood Risk Assessment (FRA). This will need to consider all sources of flooding and suggest appropriate mitigation measures. A Sustainable Urban Drainage System (SUDS) strategy will also be required so that the development achieve greenfield runoff rates. Due to ground water flooding risk, the development would need to pass a sequential test, and failing that an exception test.

6.66 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions are forthcoming in relation to the heads of terms, but it is anticipated that these would include the following:

- Affordable housing (on site)
- Affordable housing review mechanisms (early and late stage)
- Employment and Training strategy and contribution (construction)
- Air Quality
- Zero carbon off-set
- Securing potential links to district heating
- Car club (provision and membership)
- Travel Plan
- Car permit restrictions
- Sustainable transport contributions
- Public Realm improvements and maintenance
- Highway works
- TFL contributions and associated clauses.

## **7 SPECIFIC FEEDBACK REQUES**

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

- i. The principle of a tall building in this location and whether a departure from the Local Plan could be justified through the affordable housing offer and other benefits the scheme will bring
- ii. The current height, mass, design and elevation details of the development

- iii. The site layout, including enhanced public realm proposals
- iv. The current level of affordable housing.
- v. The likely impact on neighbouring living conditions.
- vi. Whether the level of car parking provision per unit (0.4 per unit) is appropriate, and if not, how the development should appropriately respond to this.

## Appendix 1: BRE Guidance Terms

### Daylight to existing buildings

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

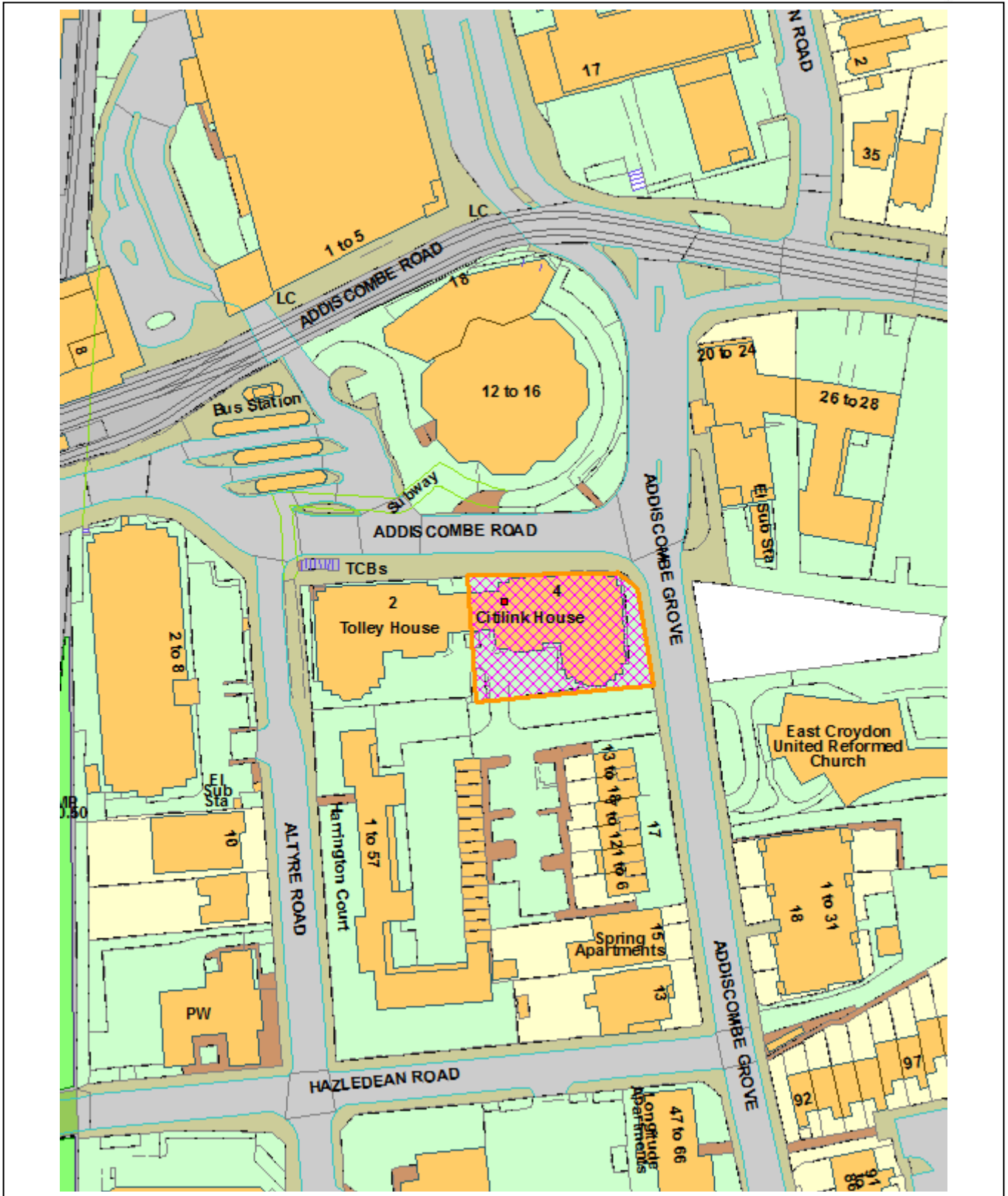
- the vertical sky component (VSC) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value (or reduced by more than 20%) known as “the VSC test” or
- the area of the working plane in a room which can receive direct skylight is reduced to less than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

### Sunlight to existing buildings

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

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

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



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**1 DETAILS OF THE DEVELOPMENT**

Ref: 19/05194/PRE  
Location: Citylink House, 4 Addiscombe Road, Croydon, CR0 5TT  
Ward: Addiscombe West  
Description: Demolition of the existing buildings. Erection of a part 27/part 13 storey building to provide approximately 494 shared-living units (sui-generis), 77 residential dwellings (C3), flexible (D1/B1) floorspace and retail/cafe (A1/A3) space  
Drawing Nos: Submitted documents  
Applicant: Fifth State  
Agent: DP9  
Case Officer: Louise Tucker

**2 PROCEDURAL NOTE**

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent application, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 The scheme has developed through a series of pre-application meetings with officers and consideration by the Place Review Panel (PRP) on two occasions. A summary of the Panel's feedback is included within this report.
- 2.4 This pre-application report aims to provide Members with sufficient information for effective engagement with the scheme, and covers the following points:
- a. Executive summary of key issues with scheme
  - b. Site briefing
  - c. Place Review Panel feedback
  - d. Material planning considerations and officers' preliminary conclusions
  - e. Specific feedback requested
  - f. Procedural matters

**3 EXECUTIVE SUMMARY**

- 3.1 The proposed scheme is for the erection of a 27 storey stepped form tower and a 13 storey shoulder building. The proposal is for approximately 494 co-living

units with associated communal areas and amenity space within the taller tower, and 77 residential flats within the shoulder building.

- 3.2 Discussions so far have primarily focused on the height, design and form of the tower and shoulder building, façade treatment and materials, the co-living typology and layout (both for the individual units and the communal spaces they rely on), affordable housing delivery, trees and existing uses on site.
- 3.3 The views of members are sought on the proposals, with particular regard to the following key issues:

Townscape, design and massing

- 3.4 Officers support the principle of a tall building in this location. Whilst the 27 storeys stepped form tower is progressing well, officers do have concerns with the proposed height of the shoulder building due to the townscape impact in terms of the transition to the lower rise residential properties to the south and the visual relationship with the NLA tower. Officers consider a proposed 9 storey shoulder height to be more appropriate and in line with emerging surrounding development. Discussions surrounding this are ongoing alongside development of the façade treatment and materiality, but Committee Members views are sought as to the height and massing currently proposed in terms of the impact on the townscape and, critically, on the provision of affordable housing (covered below).

Affordable housing

- 3.5 The applicant states that the delivery of a policy compliant scheme of 30% affordable housing with a 60:40 split between affordable rent and intermediate would not be viable. The scheme currently proposes 29.4% affordable housing by habitable room of solely intermediate tenure within the shoulder building. An independent review of the applicant's viability appraisal has been undertaken, which has concluded that there would be a viability deficit, even with the 29.4% offered. At this stage therefore it is considered this offer is the maximum reasonable amount of affordable housing which could be provided within the scheme.
- 3.6 The delivery of on-site affordable in a co-living scheme is clearly a positive aspect. Officers are cognoscente of the delicate balance between delivery of affordable housing on site and the townscape impact of the 13 storey shoulder height raised above. The views of members are sought on the delivery of affordable housing and the applicant's current proposed offer in terms of tenure (100% intermediate), taking into account the initial findings of the viability review.

Principle of co-living accommodation

- 3.7 Co-living is a relatively new product that the Croydon Plan is silent on. The starting point for the co-living element is compliance with emerging policy H16 of the Intend to Publish version of the New London Plan, which concerns large scale shared living schemes. Discussions so far have focussed particularly on the size and layout of the individual units, and the size, layout and location of communal amenity spaces. It is also clear however that living environments and social behaviours and norms are emerging and changing in current times, which this

scheme needs to be upfront about and meet head on. Committee Members views are sought on these particular elements.

#### Trees and public realm

- 3.8 Consideration of the public realm offer and the layout and activation of the ground floor is underway to ensure high quality delivery in line with the wider aspirations for the area and station which will need to work hard to support the number and variety of future residents and visitors. Members' views are sought in this regard, in addition to views on the proposed removal of the 3 mature trees on the eastern boundary.

## **4 BACKGROUND**

### **Site and Surroundings**

- 4.1 The site is located on the southern side of Addiscombe Road and is currently occupied by offices and Fairfield School of Business. Directly opposite the site is No.1 Croydon, a locally listed building which is also a locally designated landmark and falls within two local designated views. To the rear of site are residential facing Addiscombe Road and Altyre Road. The site lies within high/medium risk of surface water flooding. On the corner of Altyre Road, opposite to the site, is an office building.
- 4.2 The surrounding area is mainly a mixed commercial and residential character and there are several developments in the near vicinity such as 28-30 Addiscombe Grove, Mondial House and the Former Essex House.

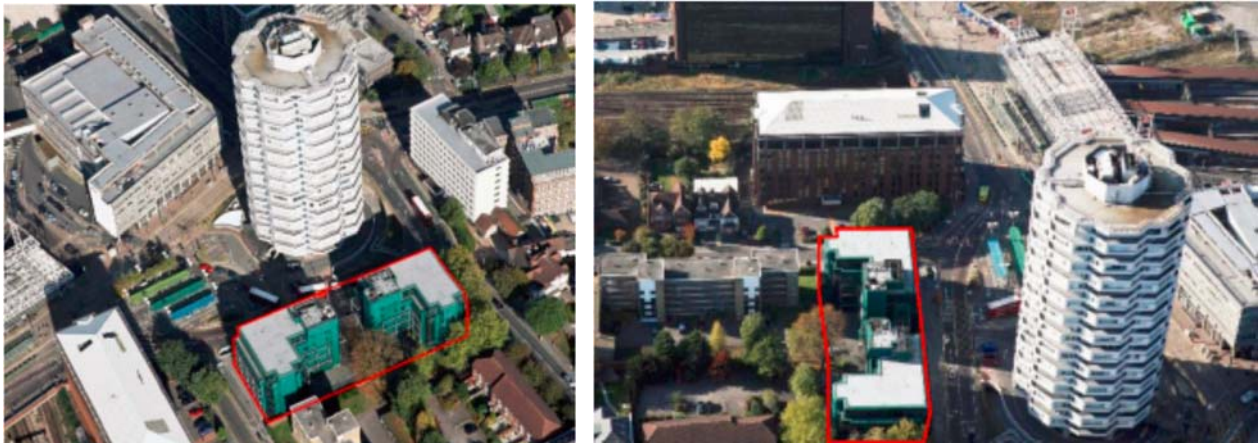


Image 1 and 2: aerial photos of site, outlined in red

### **Constraints**

- 4.3 The site is within the Croydon Opportunity Area (Edge Area – covered by policy DM38.4) and Croydon Metropolitan Centre. The site has excellent Public Transport Accessibility (PTAL 6B), being in close proximity to East and West Croydon Stations and numerous bus and tram links.

### **Planning History**

- 4.4 There is a substantial amount of planning history on the site (and indeed surrounding sites), but the following recent applications are of most relevance:

Citylink and Tolley House – 2-4 Addiscombe Road:

14/03407/P - Alterations; Use ground to fourth floors for flexible B1 (office)/D1 (educational) use – Permission granted

Land adjacent to Croydon College, College Road:

19/04987/FUL - Redevelopment of the site to provide a part 49 storey and part 34 storey building with basements, comprising 817 co-living units (Use Class Sui Generis) within Tower A and 120 residential units (Use Class C3) within Tower B, a cafe (Use Class A3), community use (Use Class D1), associated communal facilities for co-living residents, amenity spaces, cycle parking, disabled parking spaces, refuse and cycle storage and associated landscaping and public realm works - Resolved to grant

### Proposal

- 4.5 The proposed scheme is for the erection of a 27 storey stepped form tower and a 13 storey shoulder building. The proposal is for approximately 494 co-living units with associated communal areas and amenity space within the taller tower, and approximately 77 residential flats within the shoulder building. Ground floor uses comprise a public café and a community use.



Image 3: proposed ground floor plan



Image 4: typical proposed floor plan (co-living on the left, C3 residential on the right)



Image 5: proposed 12<sup>th</sup> floor plan – amenity space



Image 6: CGI showing proposed scheme from outside East Croydon Station

## 5 PLACE REVIEW PANEL (PRP) RESPONSE

5.1 The scheme was first presented to PRP on 16th April 2020. With regard to the concept of co-living, the Panel were broadly supportive of the concept, but expressed concerns at the number of nearby similar developments, and whether there was sufficient demand. The Panel agreed that the design should be futureproofed to allow conversion to C3 accommodation if the market/demand for a co-living product changes. The Panel felt that generally the communal areas will need to work hard to support the development, and advised the applicant to recognise the real number of people who will be using the building, and explore the psychology and detail of this. Further comments were made as follows:

- The massing should be amended to give greater distinction between the shoulder height and tower height, with a more slender and elegant tower height and lower shoulder height
- Reconsideration of the crown treatment and massing
- Architectural expression should be simplified in terms of the faceted façade and material palette, with more analysis of existing and emerging context need to inform and refine the expression
- Potential to provide greater distinction between different uses in elevation
- It was suggested to make more of a feature of the western elevation, which could also improve wayfinding and legibility to the public entrance
- Further investigation into the performance and quantum of communal amenity spaces required to determine if these can meet occupier needs

- Strongly advocate providing an additional stair core to meet fire safety standards and to improve movement and circulation around the building
- Further design development with fire consultant advice of usability of corridors to create more sociable spaces
- Development of the deliveries/servicing strategy and demonstrating a greater understanding of the functionality of the ground floor spaces including lobbies and back-of-house areas
- Internal reconfiguration to reduce the number of single aspect north facing units, and where it is not possible to design these out, allowing for more glazing to optimise their natural light
- Ensuring the affordable accommodation meets C3 standards and demonstrating how the co-living accommodation could be futureproofed
- Refinement of the brief for the ground floor uses
- Development of public realm design and strategy for maintenance

5.2 The scheme was further developed off the back of PRP and officer feedback. It was presented a second time to PRP on 6<sup>th</sup> August 2020. A summary of the Panel's comments is provided below:

- Agreed that the design is moving in a positive direction and commended the applicant on their work since the last PRP
- In massing terms, the 9 storey shoulder option is the most appropriate for the site (compared with the 13 storey shoulder option). This lower option corresponds to fewer units; the Panel commented that reducing the quantum of accommodation would take some of the pressure off the communal amenity space, which currently appears inadequate for the number of people who will use it.
- Acknowledged the lower option may correspond to less affordable housing as currently the affordable units are located within the shoulder, but they also noted the great importance of providing a high quality of accommodation and good level of communal amenity across both tenures. Notwithstanding this the Panel noted the scheme would still need to provide a policy compliant level of affordable housing
- Cautioned travel time difference between a 9<sup>th</sup> floor and a 12<sup>th</sup> floor amenity terrace (in the two shoulder height options being tested), further analysis of vertical travel times and movement strategies linking spaces within the building should be tested
- Are comfortable with emerging elevational treatments, however the façade is complex and must be well detailed in order to be successful. The 'weave' should be designed so as to avoid staining
- The applicant should carefully consider other material treatments and how they weather over time, and explore materials with low embodied carbon as part of the sustainability strategy
- Concern over the microclimate and comfort of the rooftop amenity spaces and public realm, and how this impact may be greater with the higher shoulder height. The Panel stressed the need to create protected, welcoming environments

- Full impact of wind must be understood and wind mitigation strategies created which are fully integrated within the design
- More information needed on the pedestrian environment around the building as Addiscombe Road is quite hostile – the design should seek to improve the existing condition and invite people across the road and into the café and urban realm
- Further investigation on the boundaries between public realm, semi-public space and private realm needed, generous and exciting spaces should be sought within a flexible ground floor
- The overall co-living layout must be suitably futureproof to allow it to respond to emerging trends and changing needs of its occupants over time. Truly flexible, adaptable spaces should be designed in from the start. The applicant should further consider the generosity of amenity spaces, both in terms of the amount of space and how it is used. The infrastructure should be ‘over-designed’ to accommodate the unknown
- This needs to be a scheme of excellent that stands the test of time, and the applicant should look ahead to how the building will function and be used in 10, 20 or 50 years times

5.3 The scheme is continuing to develop since both PRP reviews, changes made include:

- Built in flexibility to the floorplan, allowing units to be converted into C3 flats
- Initial fire strategy produced
- Additional investigation of townscape views
- Further development of the ground floor with incorporation of a mezzanine
- Further development of façade treatment/materiality and investigation of ways to better articulate the proposed form and reference to Croydon’s mid-century architecture

## 6 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of the uses
- Affordable housing
- Townscape and design
- Amenities of future occupiers
- Amenities of adjoining occupiers
- Transport
- Other considerations including S106 obligations

### Principle of the uses

#### Site designations

6.2 The site is located within the Edge Area of the Croydon Opportunity Area covered by policy DM38.4 of the Croydon Local Plan (CLP) (2018), where tall buildings can be acceptable subject to achieving a high quality form, design and treatment and where negative impact on sensitive locations is limited. Therefore the



principle of a tall building in this location is considered acceptable, subject to the above.

Co-living accommodation

6.3 To be clear, co-living is a sui-generis use and not traditional C3 residential. In terms of the principle of co-living on the site, policy SP2.7 of the CLP (2018) seeks to ensure that a choice of homes is available in the Borough that will address the need for homes of different sizes. Emerging policy H16 of the Intend to Publish version of the New London Plan concerns large-scale purpose-built shared living developments, and requires them to meet the following criteria:

- 1) it is of good quality and design
- 2) it contributes towards mixed and inclusive neighbourhoods
- 3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency
- 4) it is under single management
- 5) its units are all for rent with minimum tenancy lengths of no less than three months
- 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
  - a) convenient access to a communal kitchen
  - b) outside communal amenity space (roof terrace and/or garden)
  - c) internal communal amenity space (dining rooms, lounges)
  - d) laundry and drying facilities
  - e) a concierge
  - f) bedding and linen changing and/or room cleaning services
- 6) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes
- 7) a management plan is provided with the application
- 8) it delivers a cash in lieu contribution towards conventional C3 affordable housing

6.4 Whilst there is no mechanism currently to calculate the contribution of co-living units to housing targets, the existence of emerging policy H16 (alongside CLP policy SP2.7) makes clear that shared living developments can have a role in meeting London's housing need. The site is in a central location with excellent access to public transport, where high density residential development is appropriate.

6.5 Officers are of the view that subject to the above criteria being met and robust consideration of the other material issues, a scheme providing a mix of co-living and residential homes could be principally supported on site. However, to support the scheme, officers must be convinced that the scheme would function and operate effectively and safely for future residents in a potential pandemic scenario such as in the current circumstances with the existence of COVID-19. Further discussion on this point is provided below.

- 6.6 As with the College Tower scheme, officers have requested the applicant demonstrate that the co-living accommodation could easily be converted to C3 accommodation if there is no demand or need for this accommodation type in future. This would include consideration of location of services, doorways etc. to allow a flexible layout rather than the potential requirement for extensive conversion works.



Image 7: flexible C3 plan

#### Education facilities

- 6.7 Policy SP5.2 of the Croydon Local Plan 2018 actively encourages the location and expansion of higher and further education in the borough in order to “improve skills and act as a driver of growth and enterprise in the local economy”.
- 6.8 Current policy DM19.1 of the CLP (2018) protects community facilities, with their loss permitted where it can be demonstrated there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community.
- 6.9 The Fairfield School of Business currently operates on this site. Whilst it is understood they will be vacating the building in the coming years, policy protects community floorspace where there is need for this within the Borough. Whilst there is some community floorspace (use class D1) being re-provided as part of the scheme (362sqm), currently there will be a shortfall of 1762sqm. It is a material consideration that the current planning permission for the building allows a change of use from D1 (community use) to B1(a) (office use) which would not have any protection. Nonetheless given the current D1 use and the desire to retain the Business School within the Borough, officers’ have challenged the applicant to seek to either re-provide the equivalent floorspace as part of the development, or work with the Business School to assist in their relocation to an alternative premises (not already within a D1 use) in the Borough which meets their needs. Ultimately, however, this needs to be balanced against the fact the applicant could flip the current use to B1(a) and there be no community space to protect.

#### **Design and townscape**

##### Height and massing

6.10 The proposed scheme is for a 27 storey stepped form tower and a 13 storey shoulder building (see below indicative image). Initial concerns were raised by officers in terms of the impact of the height of both towers on townscape and heritage assets, namely in views of the NLA tower (a Locally Listed Building and local landmark) from both the north and south of the site. During pre-application discussions and 2 presentations to the PRP, the scheme has evolved from a square form to a more orthogonal form which has improved the slenderness and impacts of massing in key townscape views in particular for the 27 storey tower. Officers are supportive of this element of the scheme in principle.



Image 8: CGI showing proposed scheme from Addiscombe Grove (north east of site)

6.11 Concerns do remain regarding the impact of the proposed massing of the height of the shoulder building given the sensitivities of surrounding townscape conditions. The emerging schemes in the 'Edge Area' surrounding the NLA tower are defined by a tower and shoulder/plinth form with shoulder heights ranging from 6-9 storey, which are fundamental in mediating to the existing low rise buildings in adjacent neighbourhoods (in this case to the south – ranging from 2-4 storeys). This is most apparent in views from the south and west as shown in the images below, where a comparison is shown with a lower shoulder height of 9 storeys which officers consider is more appropriate in townscape terms with surrounding buildings, to improve the distinction between the tower and shoulder and the visual relationship with the NLA tower, in terms of wayfinding and landmark legibility. This view was also held by the PRP on both occasions and Member's views are sought.



Tower: GF+26 (88m)  
 Shoulder: GF+12 (45m)  
 Total Units: 500  
 Amenity per person: 6.15sqm  
 Affordable Units: 77 (203 habitable rooms)  
 Affordable Percent: 29%



Tower: GF+26 (88m)  
 Shoulder: GF+9 (39m)  
 Total Units: 526  
 Amenity per person: 5.85sqm  
 Affordable Units: 47 (117 habitable rooms)  
 Affordable Percent: 18%



Image 9: visuals of taller 13 storey shoulder, left and 9 storey lower shoulder, right

6.12 Balancing the impact of the additional height alongside an increased provision of affordable C3 accommodation is clearly an important exercise. The applicants have advised that reducing the height of the shoulder tower will impact on the amount of affordable units that could be provided on site. They have estimated that the percentage of affordable housing would reduce to 18% (47 units) in the 9 storey shoulder scheme, however this has not been tested as a scenario in the applicant's FVA and officers have requested the applicant explore provision of additional C3 within the taller tower in this scenario. Member's views are sought.

6.13 There are some heritage assets in the vicinity of the site, most notably the NLA tower opposite to the north which is a Locally Listed Building and the Locally

Designated View from North End looking east. Officers are assessing the likely impact on these assets, and any harm identified will need to be minimised.

#### Design approaches and façade treatments

- 6.14 The design approach is focussed on incorporating the Croydon context and mid-century heritage which is supported in principle. Particular inspiration has been taken from the faceted form of the NLA tower to create subtle woven forms within the façade which articulate a uniform grid, reflective of the internal layout arrangement. Officers are working with the applicant to ensure the ‘weave’ is articulated robustly on the façade both in form and materiality. Whilst this is under development, officers consider that this is moving in a positive direction.

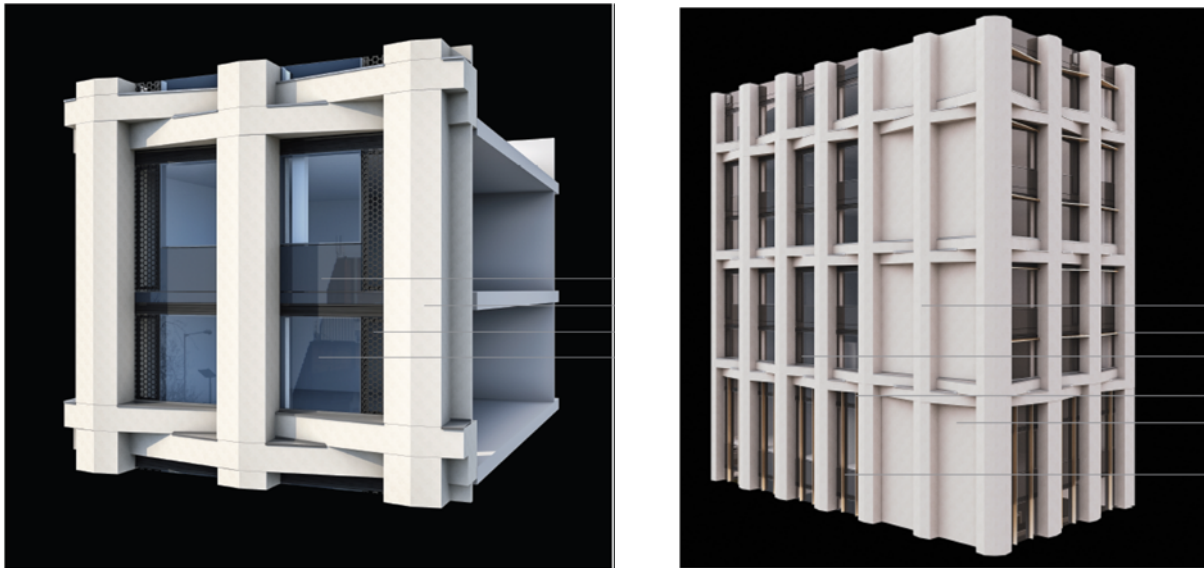


Image 10: Developing bay studies of the façade

- 6.15 A public art strategy will also need to be outlined and developed, and this could help improve the schemes contextuality.

#### Materiality

- 6.16 The applicant is proposing predominantly precast concrete for the cladding. Officers have encouraged the applicant throughout to adopt a creative and holistic approach to exploring tone/colour of proposed materials in relation to the setting, in tone/colour variations between tower and shoulder, finish, technical attributes and longevity.
- 6.17 Whilst the complex intersecting and overlapping forms could be very successful, officers have questioned whether the chosen approach is the best approach in terms of dealing with water and weathering over the course of time. Whilst this could potentially be supported, officers need to be convinced that the aspirations shown in the façade studies actually can be achieved through elegant and robust detailing solutions. These technical challenges should be explored and resolved as part of the pre-application discussions and cannot be left to condition, as well as meaningful consideration of alternative options e.g. ceramic formwork.

#### Public realm

6.18 Officers are currently working with the applicant on the design and layout of the entrance points and ground floor treatment, to ensure the base of the building is unique and welcoming for this key site which sits within the vicinity of East Croydon station. The recent introduction of a mezzanine floor at ground floor has been a positive addition in activating the frontage, discussions with the applicant in improving the ground floor layout are to continue.



Image 11: proposed block plan

6.19 Discussions are ongoing regarding the spaces and routes through and around the site and the ground floor layouts, including accounting for pedestrian flows, wind and microclimate. Further work is needed in this regard, in particular development of the café canopy and wider landscaping and public realm strategy. Officers have requested wind testing to be undertaken both on the public and private aspects of the scheme, with any required mitigation designed in at this stage. This has not yet been provided.

### Trees

6.20 There are 3 mature trees to the south of the site which are proposed to be retained as part of the scheme, which officers support. To the east are 3 mature London Plane trees, which are 16m in height and highly prominent in the local area. Currently the applicant considers these trees to be Category B trees and proposes to remove them as part of the scheme, justifying that this would be inevitable as part of the demolition of the existing building where they are likely to become unstable once demolition occurs ( as roots are bracing against the existing footings). The applicant proposes to mitigate this by planting 6 new trees within the public realm scheme, fronting Addiscombe Road. Officers do have some concerns over whether there is sufficient space for replacement trees of a comparable size and canopy spread to be accommodated long term, particularly where they are proposed on a main thoroughfare, in close proximity to north facing windows and on the north side of a tall building thus reducing sunlight. The applicant has also committed to a financial contribution equivalent to the

CAVAT value of the trees, which could be spent on replacement trees in the borough.

- 6.21 Officers consider the trees to have very high public amenity value and would grade them Category A as a group, given their life expectancy and prominence in the area. On the basis of what has been submitted thus far, it is considered the trees could be retained if the existing building was removed, and could be accommodated as part of the scheme with a good management strategy going forward. It is acknowledged that with the current scheme retaining the trees would result in a reduced footprint of the shoulder building with a resultant reduction in affordable housing. The applicant has estimated that the change in footprint would result in the loss of 12 affordable units, bringing the percentage across the scheme from 29% to 27%.

### **Affordable housing**

- 6.22 As per CLP policies SP2.4 and SP2.5, for traditional residential accommodation the Council will negotiate to achieve up to 50% affordable housing subject to viability, and will seek to achieve a 60:40 ratio between affordable rented homes and intermediate homes.
- 6.23 In terms of co-living, emerging policy H16 of the Intend to Publish version of the New London Plan requires co-living accommodation to deliver a cash in lieu contribution towards conventional C3 affordable housing. The policy directs that this should be sought either as an upfront cash in lieu payment to the LPA, or by way of an in perpetuity annual payment to the LPA. In both cases the contribution provided is expected to be the equivalent of 35% of the units (to be provided at a discount of 50% of the market rent).
- 6.24 Officers consider that a mixed co-living/residential scheme should deliver traditional affordable residential accommodation on site in line with policy SP2 of the CLP (2018), as opposed to a cash in lieu payment for a wholly co-living scheme. However this needs to be robustly tested against the Intend to Publish version of the New London Plan requirements for co-living accommodation. Officers have stressed that the expectation is that this should be provided as policy compliant in terms of amount and tenure split.
- 6.25 The applicant is currently offering the majority of the shoulder building as affordable C3 accommodation (77 units). A pre-application viability appraisal has been provided and has been independently assessed. The scenario assessed within the appraisal assumes 494 co-living units in a 27 storey tower and 77 affordable housing flats in a 13 storey shoulder, with the entirety of the latter being affordable. This provision would equate to 29.4% by habitable room, albeit assumed to be entirely of an intermediate tenure comprising 70% shared ownership (54 units) and 30% London Living Rent (23 units), with no provision for affordable rented homes. It is important to note the developer has engaged with Registered Providers and Metropolitan Thames Valley Housing have confirmed their support for the scheme and the mix.
- 6.26 The financial viability of the proposed development has been independently reviewed. The initial conclusions of this review are that the scheme is unviable,

even with the current affordable housing offer. Officers are therefore of the view that the scheme cannot viably deliver any additional affordable housing and that the current offer is the maximum reasonable that the scheme can deliver.

- 6.27 As discussed above, officers have raised concern in terms of the townscape impact of the shoulder tower at 13 storeys high. Reducing this height could impact on the amount of affordable housing which could be provided. Views of committee members relating to the townscape impact are therefore sought, along with views on the current affordable housing offer.
- 6.28 Officers are working with the applicant to discuss this further and are engaging with the GLA on this matter.

### **Quality of co-living accommodation (tower)**

- 6.29 Co-living is a sui-generis use and therefore not required to meet the minimum floorspace standards as required for traditional C3 homes. As a starting point, emerging policy H16 of the Intend to Publish version of the New London Plan provides specific requirements for this type of accommodation. Key to this in differing to traditional residential accommodation is that whilst units must provide adequate and functional living space and layout, they must also demonstrably not be self-contained homes nor be capable of being used as such. The GLA have confirmed that their expectation is a unit size between 20-30sqm floorspace, but no higher.
- 6.30 The unit sizes for the proposed co-living units would range between 21-34sqm, with an average size of 23sqm. Officers have advised the applicant that the sizes of the units within the co-living element of the scheme should comply with the guidance set out above (between 20-30sqm), so as to be functional but incapable of being a self-contained home. All units would have a bed, small living room and kitchenette and en-suite bathroom. Officers have further stressed the importance of research and metrics for other co-living schemes to provide a convincing justification that the proposed layout is acceptable. The unit sizes are currently supported, subject to minor reductions to the 34sqm units.
- 6.31 The second critical element is the quality and the arrangement of the communal areas in the scheme, which is a key part of emerging policy H16. Generally other schemes in operation or consented have a kitchen for residents on each floor of the building. Throughout the pre-application process, the applicant has carried out research into existing co-living schemes and operators, including taking advice from Studio Weave who have carried out extensive research into shared living as an alternative model for housing. As a result of this work, kitchen and dining areas for residents have been incorporated on every floor, in addition to flexible kitchen/dining facilities for larger groups on the 12<sup>th</sup> floor. Whilst this is notably distinct from the recently consented College Tower scheme (which proposed at top and bottom of a tower), this would help provide a different offer and officers are supportive of this in principle. Discussions should continue in this respect, for example the number of kitchen stations, equipment provided, how the kitchen/dining spaces would operate.



- 6.32 A number of other amenity spaces for residents are proposed, including a gym, laundry room, cinema and spa, and overall with the kitchen spaces included there would be an average area of approximately 6.9sqm per resident of amenity space (internal and external). Whilst this is generally positive and greater in comparison to other co-living schemes, the applicant must demonstrate that there are enough communal areas in convenient proximity to all units (and to facilitate socialising and community engagement of residents on individual floors). This should include analysis of other co-living schemes and resident preferences/behaviour, working towards a range of different spaces where the layout and design of spaces (both internal and external) is high quality and is able to accommodate a variety of residents/users. This must include a rationale and justification for the amount of amenity space on each of the lower floors, which is smaller than that of the upper floors. GLA officers have fed back the importance of ensuring equal levels of amenity through the building and maximising the amount of communal amenity. Members' views are sought in this respect.
- 6.33 Critically the applicant must meaningfully and robustly demonstrate how their scheme would operate and function successfully and safely, taking into account a potential pandemic scenario as per the current circumstances. The main principles of the current proposal were designed prior to COVID-19. Given lifestyles and behaviour are currently significantly different to 'normal' which will likely continue for the foreseeable future (for example, more remote working, more isolated living and importance of the home environment), it is critical the applicant considers the implications of this for a co-living scheme given how dependent its success is on 'communal living'. For example, how the building would operate in a 'lockdown' scenario, access to amenity space and basic cooking facilities for individuals self-isolating or shielding, management of social distancing with a significant amount of residents e.g. single use of lifts and impact on access to amenity, cleaning regimes of units and communal areas and protecting mental health and wellbeing of residents. This has been fed back both from the PRP and from officers which the applicant has begun to address; work on this should continue through the pre-application process with scheme specific details and data. Members' views are sought.
- 6.34 Concerns have been raised regarding the single aspect north facing units in terms of daylight/sunlight and outlook given the size of the units and proximity to the NLA tower. Detailed analysis of the daylight/sunlight impacts are yet to take place, but the internal layouts and orientation have been amended during the course of pre-application to reduce the proportion of north facing units which is positive. Officers have requested the applicant consider options to mitigate this in a meaningful way to ensure good quality living conditions for these units, for example working with fenestration and the façade to maximise light infiltration.
- 6.35 Whilst not strictly a planning matter, the number of units (and people) per core and what the potential fire safety strategy would be is an important consideration which officers want comfort on before any application is determined. The applicants have provided an initial fire strategy which officers will assess with colleagues in our Building Control team to ensure it is realistic and evidenced.

**Quality and mix of C3 residential accommodation (shoulder building)**

- 6.36 Each typical floor comprises a 3 x 1 bedroom, 3 x 2 bedroom and a 1 x 3 bedroom units. Policy DM1 of the Croydon Local Plan expects a minimum of 20% of traditional residential units in the site's location to have 3 or more bedrooms. For development approved by February 2021 some of the requirement may be substituted by 2 bedroom 4 person units (subject to an absolute minimum of 5% 3-bedroom units). Currently 12% of the C3 units are three bedroom homes, with 29% 2 bedroom 4 person homes.
- 6.37 Whilst the majority of the units would be dual aspect or south facing single aspect, there is one 2 bedroom unit which would be single aspect and north facing which officers have raised concern with. That said, officers recognise the orientation of the site on an east-west access and the difficulty in avoiding north-facing units completely. A daylight and sunlight assessment has not yet been undertaken, but this has been requested to understand whether this, and indeed all, the units will achieve adequate levels of daylight in accordance with BRE guidance.
- 6.38 Each residential unit would benefit from an inset balcony, with communal amenity space provided at roof level. Discussions are ongoing with regards to the size and quality of this space given it will need to meet communal and playspace needs for all residents (which should be in accordance with policy requirements), including microclimate considerations.

#### **Impact on adjoining occupiers**

- 6.39 There are a number of buildings surrounding the site, along with a number of planning consents granted (and schemes coming forward) in close proximity. Minimum separation distances to the Pocket Living scheme to the east of the site are approximately 16m which, taking into account the dense urban location, could be supported if adequate daylight/sunlight levels are demonstrated.
- 6.40 The applicant has been made aware that the development will need to take full account of surrounding development, both current and emerging. A daylight/sunlight assessment has been provided by the applicant which officers are in the process of assessing. In terms of VSC, 32% of surrounding windows are in the process of assessing. In terms of VSC, 32% of surrounding windows would fail to meet BRE guidance (taking into account the urban location of the site), with a proportion of these experiencing moderate to major transgressions. These are across a number of surrounding buildings, including the Pocket Living scheme and 13-17 Addiscombe Grove but the worst affected are in the eastern and northern façade of Harrington Court, immediately to the south of the site (125 windows tested and 69 fail VSC). 49% of these worst affected windows would meet BRE guidance for the 'No Sky Line' assessment (27 out of 55). Of those that failed this test, 1 window (in Harrington Court northern façade) out of the 27 tested would fail to meet BRE guidance for the ADF test. However it is not clear from the data if any kitchens have been affected which have a higher ADF requirement (if so resulting in 4 failures). The daylighting for surrounding occupiers will continue to be carefully considered.
- 6.41 In terms of sunlight, the results provided show that approximately half of all existing garden amenity areas adjoining the proposed site boundary will continue to receive at least two hours of sunlight on 21<sup>st</sup> March. It is not clear which

properties will be most affected here and further information will be sought from the applicant.

- 6.42 Overall it is clear there will be some major daylight and sunlight impacts resulting from the scheme, in particular to those in Harrington Court. Officers will continue to assess the results and ensure all of the affected properties and gardens have been tested accurately and robustly, so a full appreciation of the impact and any remediation can be understood. It is appreciated that there will be some degree of impact with any tall building on the site and the dense urban nature is acknowledged. This will need to be weighed against the extent of the impact and potential mitigation, alongside whether the scheme delivers sufficient public benefit. Members' views are sought.

### **Highways and transport**

- 6.43 4 disabled parking spaces are proposed to the rear, with the remainder of the development car free given the highly accessible location. These spaces would be accessed via the existing access from Addiscombe Grove, with exact arrangements to be agreed to ensure this works with the adjacent site and safe manoeuvring can be achieved. Refuse storage would also be to the rear at ground floor level, with collection taking place from the proposed loading bay on Altyre Road. Cycle storage at lower ground level accessed via designated cycle lifts from Addiscombe Grove.
- 6.44 Consideration is being given to the likely transport and access impacts which are specific to a mixed co-living/residential scheme of this size, with public uses on the ground floors. The public realm will need to work hard with this and wider schemes coming forward in the vicinity and there will be a need for TfL contributions given the reliance on East Croydon rail, tram and bus.
- 6.45 There is likely to be a high demand for deliveries and servicing in and around the building, separate refuse and recycling collection arrangements and high numbers of resident and visitor cyclists. Use and site specific analysis with proposed mitigation has been requested from the applicant.
- 6.46 A loading bay is proposed on Altyre Road. This is required to service the development and is the only feasible siting for it, taking into account the constrained nature and location. The formation of the loading bay would require the infilling of the adjacent existing subway to the north west. The infill of this subway is supported in principle. The applicant is intending for this to form part of their application and carry out the works as part of their development and public realm improvements. Whilst officers consider this to be a feasible solution, the detail and likely process for this are currently being discussed with the applicant. As this would be required to facilitate the development, it would need to be secured through use of a grampian condition or legal agreement.
- 6.47 Restriction of car parking permits for future occupiers would be secured by legal agreement. Preference would be for a car club to be provided on site; this will need to be balanced against the need for disabled spaces. If one cannot be delivered on site, the applicant will need to pay for an on-street space, as well as membership for all future residents.

## **Environmental impact and sustainability**

- 6.48 A detailed sustainability strategy has not yet been confirmed, but the applicant has been made aware of the relevant policy requirements, including for passive design and zero carbon development. Full discussions relating to air quality, overheating, surface water drainage, microclimate and lighting impacts are yet to be held.
- 6.49 The site is within Flood Zone 1 (low risk) and an area of surface water flood risk. The applicant has been advised that a full flood risk assessment and drainage strategy would be required to support a planning application. Green field run-off discharge rates are the policy requirement.
- 6.50 A request for an Environmental Impact Assessment Screening Opinion was submitted by the applicant. It has been confirmed that an EIA will not be required (on the basis of the current development parameters).

## **Mitigation**

- 6.51 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions are forthcoming in relation to the Heads of Terms, but it is anticipated that these would include the following:

- Affordable housing (on-site)
- Affordable housing review mechanisms (early and late stage)
- Employment and training (contributions and obligations)
- Air Quality contribution
- Zero carbon offset (if required)
- Future connect to District Heating Network
- Car parking permit restrictions
- Car club provision and membership
- Travel Plan
- Transport for London contributions
- Sustainable transport contributions (to include cycling enhancements)
- TV signal mitigation
- Wind mitigation
- Public realm delivery and maintenance
- Highway works including infilling of the subway
- Retention of scheme architects
- Co-living management plan

## **7 SPECIFIC FEEDBACK REQUESTED**

- 7.1 In view of the above, it is suggested that members focus on the following issues:
1. The principle of a high density mixed-use development in a PTAL 6B location.
  2. The heights of both the tower and should building, particularly the impact of the 13 storey shoulder height on the townscape and views.

3. The current affordable housing offer, and whether there is scope to justify the height of the 13 storey shoulder for provision of C3 affordable housing compared to a lower offer within a 9 storey shoulder
4. The loss of 3 existing quality trees and their replacement with 6 new trees, together with securing CAVAT values for additional tree planting within the Borough, set against a reduced footprint and reduced affordable housing offer
5. The standard of both the co-living and residential accommodation, in terms of quantum, layout, range, light, outlook and privacy including the communal amenity spaces
6. The site layout, including public realm proposals
7. The likely impact on neighbouring occupiers in terms of daylight and sunlight
8. The proposed design approach to the façade and elevation details including materiality
  
9. The level and location of car and cycle parking proposed

## **8 PROCEDURAL NOTE**

- 8.1 A planning application for the proposed development would be referable to the Mayor of London under the Mayor of London Order 2008.
- 8.2 The applicant has submitted a pre-application to the Greater London Authority (including consideration by Transport for London) for an opinion. Two meetings have been held thus far. Whilst supportive of the principle, their main feedback focussed on the quality of communal space provided for the co-living units and the amount of affordable housing to be delivered by the scheme.

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## PLANNING COMMITTEE AGENDA

### PART 6: Planning Applications for Decision

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#### 1 INTRODUCTION

- 1.1 In this part of the agenda are reports on planning applications for determination by the Planning Committee.
- 1.2 Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
- 1.3 Any item that is on the agenda because it has been referred by a Ward Member, GLA Member, MP or Resident Association and none of the person(s)/organisation(s) or their representative(s) have registered their attendance at the Town Hall in accordance with the Council's Constitution (paragraph 3.8 of Part 4K – Planning and Planning Sub-Committee Procedure Rules) the item will be reverted to the Director of Planning and Strategic Transport to deal with under delegated powers and not be considered by the committee.
- 1.4 The following information and advice applies to all reports in this part of the agenda.

#### 2 MATERIAL PLANNING CONSIDERATIONS

- 2.1 The Committee is required to consider planning applications against the development plan and other material planning considerations.
- 2.2 The development plan is:
  - the London Plan (consolidated with Alterations since 2011)
  - the Croydon Local Plan (February 2018)
  - the South London Waste Plan (March 2012)
- 2.3 Decisions must be taken in accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Committee to make its determination in accordance with the Development Plan unless material planning considerations support a different decision being taken. Whilst third party representations are regarded as material planning considerations (assuming that they raise town planning matters) the primary consideration, irrespective of the number of third party representations received, remains the extent to which planning proposals comply with the Development Plan.
- 2.4 Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.

- 2.5 Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 2.6 Under Section 197 of the Town and Country Planning Act 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.
- 2.7 In accordance with Article 31 of the Development Management Procedure Order 2010, Members are invited to agree the recommendations set out in the reports, which have been made on the basis of the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.
- 2.8 Members are reminded that other areas of legislation covers many aspects of the development process and therefore do not need to be considered as part of determining a planning application. The most common examples are:
- **Building Regulations** deal with structural integrity of buildings, the physical performance of buildings in terms of their consumption of energy, means of escape in case of fire, access to buildings by the Fire Brigade to fight fires etc.
  - Works within the highway are controlled by **Highways Legislation**.
  - **Environmental Health** covers a range of issues including public nuisance, food safety, licensing, pollution control etc.
  - Works on or close to the boundary are covered by the **Party Wall Act**.
  - **Covenants and private rights** over land are enforced separately from planning and should not be taken into account.

### 3 **ROLE OF THE COMMITTEE MEMBERS**

- 3.1 The role of Members of the Planning Committee is to make planning decisions on applications presented to the Committee openly, impartially, with sound judgement and for sound planning reasons. In doing so Members should have familiarised themselves with Part 5D of the Council's Constitution 'The Planning Code of Good Practice'. Members should also seek to attend relevant training and briefing sessions organised from time to time for Members.
- 3.2 Members are to exercise their responsibilities with regard to the interests of the London Borough of Croydon as a whole rather than with regard to their particular Ward's interest and issues.

### 4. **THE ROLE OF THE CHAIR**

- 4.1 The Chair of the Planning Committee is responsible for the good and orderly running of Planning Committee meetings. The Chair aims to ensure, with the assistance of officers where necessary, that the meeting is run in accordance with the provisions set out in the Council's Constitution and particularly Part 4K of the Constitution 'Planning and Planning Sub-Committee Procedure Rules'. The Chair's most visible responsibility is to ensure that the business of the meeting is conducted effectively and efficiently.
- 4.2 The Chair has discretion in the interests of natural justice to vary the public speaking rules where there is good reason to do so and such reasons will be minuted.



- 4.3 The Chair is also charged with ensuring that the general rules of debate are adhered to (e.g. Members should not speak over each other) and that the debate remains centred on relevant planning considerations.
- 4.4 Notwithstanding the fact that the Chair of the Committee has the above responsibilities, it should be noted that the Chair is a full member of the Committee who is able to take part in debates and vote on items in the same way as any other Member of the Committee. This includes the ability to propose or second motions. It also means that the Chair is entitled to express their views in relation to the applications before the Committee in the same way that other Members of the Committee are so entitled and subject to the same rules set out in the Council's constitution and particularly Planning Code of Good Practice.

## **5. PROVISION OF INFRASTRUCTURE**

- 5.1 In accordance with Policy 8.3 of the London Plan (2011) the Mayor of London has introduced a London wide Community Infrastructure Levy (CIL) to fund Crossrail. Similarly, Croydon CIL is now payable. These would be paid on the commencement of the development. Croydon CIL provides an income stream to the Council to fund the provision of the following types of infrastructure:
- i. Education facilities
  - ii. Health care facilities
  - iii. Projects listed in the Connected Croydon Delivery Programme
  - iv. Public open space
  - v. Public sports and leisure
  - vi. Community facilities
- 5.2 Other forms of necessary infrastructure (as defined in the CIL Regulations) and any mitigation of the development that is necessary will be secured through A S106 agreement. Where these are necessary, it will be explained and specified in the agenda reports.

## **6. FURTHER INFORMATION**

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

## **7. PUBLIC SPEAKING**

- 7.1 The Council's constitution allows for public speaking on these items in accordance with the rules set out in the constitution and the Chair's discretion.

## **8. BACKGROUND DOCUMENTS**

- 8.1 The background papers used in the drafting of the reports in part 6 are generally the planning application file containing the application documents and correspondence associated with the application. Contact Mr P Mills (020 8760 5419) for further information. The submitted planning application documents (but not representations and consultation responses) can be viewed online from the Public Access Planning Register on the Council website at <http://publicaccess.croydon.gov.uk/online-applications>. Click on the link or copy it into an internet browser and go to the page, then enter the planning application number in the search box to access the application.

## **9. RECOMMENDATION**

- 9.1 The Committee to take any decisions recommended in the attached reports.

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## **PLANNING COMMITTEE AGENDA**

### **PART 8: Other Planning Matters**

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#### **1 INTRODUCTION**

- 1.1 In this part of the agenda are reports on planning matters, other than planning applications for determination by the Committee and development presentations.
- 1.2 Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
- 1.3 The following information and advice applies to all those reports.

#### **2 FURTHER INFORMATION**

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

#### **3 PUBLIC SPEAKING**

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

#### **4 BACKGROUND DOCUMENTS**

- 4.1 For further information about the background papers used in the drafting of the reports in part 7 contact Mr P Mills (020 8760 5419).

#### **5 RECOMMENDATION**

- 5.1 The Committee to take any decisions recommended in the attached reports.

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