

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 19/04987/FUL
 Location: Land Adjacent to Croydon College, College Road, Croydon, CR0 1PF
 Ward: Fairfield
 Description: 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.
 Drawing Nos: See Appendix 1
 Applicant: Tide Construction Ltd
 Agent: HTA Design LLP
 Case Officer: Louise Tucker

Accommodation	Co-living units	1 bed 2 person	2 bed 3 person	3 bed 4 person
Co-living market rent (Tower A)	817	N/A	N/A	N/A
Intermediate housing (Tower B)	N/A	60	30	30
Total	817	120		

	Type of floor space	Amount proposed
Tower A	Co-living (Class Sui Generis)	35,791.1sqm
	Restaurants and Cafes (Class A3)	56sqm
Tower B	Residential (Class C3)	11,804.5sqm
	Non-residential Institutions (Class D1)	316sqm
	Total	47,966.1sqm

	Number of car parking spaces	Number of cycle parking spaces
Tower A	11 blue badge disabled spaces	283 long stay spaces for Tower A (with 130 spaces for hire cycles)
Tower B	4 blue badge disabled spaces	180 long stay spaces
Total	15 blue badge disabled spaces	463 long stay spaces (with 16 short stay spaces within the public realm)

1.1 This application is being reported to Planning Committee in accordance with the Committee consideration criteria as the scheme proposes more than 200 new residential dwellings.

2.0 BACKGROUND

2.1 An earlier iteration of this proposal was presented to the Planning Committee at pre-application stage on 10th October 2019. This proposed the erection of a part 33 part 48 storey building comprising 836 co-living units (use class sui generis), 120 residential units (use class C3), and associated parking, servicing, landscaping and public realm works.

2.2 The main issues raised were as follows:

- Members had differing views with regards to the height of the towers. Some Members raised concern (with regard to clustering and daylight/sunlight impact on the surrounding area), whilst some Members welcomed the height (but only if the two towers had their own separate identity) and some Members supported a tiered approach, stepping down from 101 George Street to College Green.
- Members welcomed the principle of C3 affordable housing delivery in Tower B (100% shared ownership), however there is a need for affordable rented accommodation provision within the scheme, either as affordable rent within Tower B or consideration of discounted rented accommodation within the co-living Tower A. Members also questioned how the developer will calculate the rental values of the co-living units and what services would be included in the rent.
- Members generally supported the principle of co-living, but requested further assurance/justification in terms of operation, management and safety of them as a living alternative, including what would happen if co-living did not work and needed to be retrofitted to C3. There was general consensus that communal space at top and bottom was appropriate. The variety of finishes on each floor to give them uniqueness was positively received. Some Members were concerned that the scheme does not provide accommodation for facilities. Members challenged the applicant to demonstrate safety of all users.
- There were mixed views on the design of the building. Members discussed the geometry of the building and the awkward points where the façade is stretched, particularly on the corners which needs further work. Members wanted to see individuality in the towers with a different cladding approach on both to avoid coalescence.
- Members reiterated the importance of the link between East Croydon rail station and the Fairfield Halls. Members indicated the colonnade looked positive, but challenged the applicant to ensure the space was as safe, active and well-lit as possible. There were suggestions for the applicant to work further with the neighbouring applicants for elements of Fairfield to be brought into the scheme.
- There was request for provision of blue badge spaces and mobility scooters.
- Daylight and sunlight impact on the surrounding area identified as important and assessment to reflect consented and emerging schemes.

- Some Members challenged the separation of the scheme from other tall buildings, such as 101 George Street and whether this was too close.
- Fire safety was identified as important given the height and clarity needed with submission.

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

2.4 The scheme was presented on two occasions to the Place Review Panel (PRP) at pre-application stage. The main issues raised by the Panel were as follows:

- With regard to the concept of co-living, the Panel felt that this could work for the site given the accessible town centre location. However, given there are very few UK precedents for this housing typology, they felt a lot more research was required to present robust justification of appropriate space standards and design for the individual units, communal spaces and circulation spaces (including of schemes from Europe and around the world).
- The Panel felt it was vital that the building includes a range of high quality shared facilities and enables social interaction between residents for their physical and mental wellbeing, and to mitigate for the small unit sizes.
- In terms of design and townscape impact, the Panel opposed any increase in height of Tower B from the consented scheme and opposed increasing the footprint, due to coalescence with surrounding buildings and harm to townscape and setting of heritage assets. The Panel considered the height of Tower A above that of 101 George Street could be acceptable, subject to views testing.
- The Panel looked forward to see how the design of the public realm will be developed to integrate successfully with the public realm design for the cultural quarter and play a key role in enhancing the important pedestrian route between the cultural quarter and East Croydon station, as well as providing some outdoor space for the scheme's residents.
- The Panel felt microclimate and fire safety need careful consideration.

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

3 RECOMMENDATION

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

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

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

- a) Affordable housing – 120 C3 residential units (London Shared Ownership) (the entirety of Tower B)
- b) Affordable housing review mechanism (early and late stage review)

- c) Co-living management plan
- d) Units all for rent with minimum tenancy lengths of no less than three months
- e) Operator confirmation and detailed management plan including security
- f) Public realm strategy and contribution
- g) Public realm strategy for wider area and contribution
- h) Financial contribution to child playspace of £13,051
- i) Local Employment and Training strategy and financial contribution of £75,000
- j) Financial contribution to car club space improvements of £24,075
- k) Travel Plan monitoring for 3 years and monitoring fee of £3,988
- l) Retention of scheme architects
- m) Off-site highway works and wind mitigation – s.278 Agreement to cover all associated highway works to facilitate development, and any off site wind mitigation measures
- n) Air quality financial contribution of £19,380
- o) Carbon offsetting contribution for Tower B of £115,200
- p) Remove access for future residents to CPZ permits and season tickets for Council car parks
- q) Transport contributions and requirements (to include cycle contribution, car club contributions/membership, EVCP, ATZ improvements, ANPR camera, cycle scheme on College Road, Delivery and Servicing Plan bond)
- r) Future district heat network connection
- s) TfL financial contribution towards improvements and upgrades to the local public transport network
- t) TV satellite dish mitigation
- u) Wind mitigation works
- v) Marketing and fitting out of all ground floor units for the eventual end occupier
- w) Access to upper floor to the public on at least one occasion per year
- x) Monitoring fees
- y) And any other planning obligations considered necessary

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

2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

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

Both Tower A and Tower B

Pre-commencement

3. Design development of the crown of the buildings
4. Design development of the plinth articulation
5. Typical façade materials and detailing – 1:20 details used then to produce 1:1 mock-ups, with 1:5 details to confirm following approval
6. 1:1 mock ups of the Crown, Tower A and B portion showing interface, and of the lower amenity levels and colonnade

7. External facing materials, including physical samples and detailed drawings of design elements
8. Public Art strategy, designs and implementation (brief and commissioned pieces for both the colonnade and the elevations including physical samples)
9. Details of public realm and landscape design to ensure it is coordinated with neighbouring developments and the emerging Council College Green public realm designs
10. Tree planting and management strategy
11. Vehicle Dynamics Assessment with hostile vehicle mitigation and anti-terrorist measures
12. Construction logistics plan and method statement
13. Construction Environment Management Plan
14. NATS radar mitigation scheme
15. Aviation warning lights (including construction)
16. Sustainable urban drainage strategy (detailing any on and/or off site drainage works)
17. Impact study of the existing water supply infrastructure
18. Secured by Design/engagement with the Police
19. Accord with Air Quality Assessment and submission of air quality Low emission strategy

Pre-occupation

20. Hard and soft landscaping, including rooftop amenity spaces, children's playspace and equipment, boundary treatments and planters (including detailed sections with proposed planting)
21. Public realm and building lighting scheme (linked with development of the colonnade and elevations) and to include night time illumination
22. Landscaping and public realm management and maintenance strategy
23. Details of fenestration of the ground floor, including shop fronts, glazing, signage zones and co-ordination and enhancement of the public realm
24. Lighting and CCTV of bin and bike stores, surface and under-croft parking areas
25. Details of cycle parking and storage (including staff provision)
26. Access routes and signage down the ramp and into basement for pedestrians, cyclists and cars
27. Refuse store and collection management plan
28. Detailed delivery and Servicing Plan to be submitted
29. Car park management plan (including EVCP)
30. Rooftop amenity for both towers to be agreed including mitigation
31. Window ventilation systems and sound insulation
32. Biodiversity enhancements
33. Café and co-living kitchens extraction details
34. Details of air handling units/plant/machinery and screening
35. Building maintenance strategy including window cleaning

Compliance

36. Co-living elements to be under single management
37. Use of ground floor as Class A3/D1/co-living reception
38. Restriction on hours of use of non-residential uses
39. 35% CO2 reduction on site
40. BREEAM excellent for non-residential
41. All features and materials must comply with Part B of the Building Regulations in relation to fire safety

42. Parking spaces, disabled parking, cycle parking installed in accordance with the approved details prior to occupation
43. Public accessibility of areas within the building to be provided as specified
44. Compliance with fire statement
45. Accord with contaminated land assessment with validation report submitted prior to occupation
46. Development shall stop if unexpected contamination found, and appropriate remediation agreed, carried out and verified
47. Petrol and oil interceptors for car park
48. Accord with mitigation outlined in Noise Assessment
49. Noise from air and plant units should not increase background noise
50. Accord with submitted Residential Green Travel Plan
51. Meanwhile strategy, plan and implementation if required
52. In accordance with submitted energy strategy

Tower A specific

Pre-commencement

53. Final details of number and details of kitchen stations, booking systems for amenity areas within building and smart lift system, seating within corridors, seating areas at ends of east/west corridors, typical unit entrances

Pre-occupation

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

Compliance

55. Minimum co-living floorspace - total amenity (3,016sqm), kitchen areas (1,361sqm), laundry (69sqm), gym and gym studio (198sqm), rooftop (556sqm)
56. Maximum co-living floorspace - co-working and maker space (240.9sqm), plant areas as specified in the application
57. Co-living facilities to be for use by residents only
58. Units CS:B1 and CS:B2 on each floor to be DDA compliant
59. Public café to be used as leasing/marketing suite for year after first occupation, following this shall revert to A3 use for lifetime of development

Tower B specific

Pre-occupation

60. Any extract systems for community use

Compliance

61. 10% of units M4(3) and 90% M4(2)
62. Community use retained as D1 use for lifetime of development
63. 110 litre/person/day water consumption target
64. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy

- 3) Material/detailing conditions information
- 4) Code of practise for Construction Sites
- 5) Light pollution
- 6) Requirement for ultra-low NOx boilers
- 7) Thames Water - groundwater discharge and water pressure
- 8) Site notice removal
- 9) Environmental health
- 10) Network Rail construction and information
- 11) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

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

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

2.6 That if by 27th May 2020 the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The application seeks permission for the following:

- Redevelopment of the former car park with the erection of a part 34 (Tower B), part 49 (Tower A) storey building
- Tower A comprising 817 co-living units for rent (Class Sui Generis)
- The co-living tower would contain 3,016sqm of co-living communal amenity space including 1,331sqm of communal catering facilities, 241sqm of co-working and maker space at second floor level and 556sqm of roof top garden amenity space and terrace on Floor 48. A café/reception for residents is proposed at ground floor, with offices and parcel room. A public café (Class A3) at ground floor level of 56sqm is also proposed
- Tower B comprising 120 residential units (Class C3) made up of 60 x 1 bedroom 2 person, 30 x 2 bedroom and 30 x 3 bedroom units
- The C3 tower would provide 100% affordable housing (120 London Shared Ownership flats) equating to 30.5% of the whole scheme by habitable room) with roof top garden amenity space for residents on Floor 33. Ground and first floor to include 316sqm of non-residential floor space (Class D1) and residential cycle store providing 180 spaces at second floor level.
- The provision of 15 blue badge disabled parking spaces at basement level (11 for Tower A and 4 for Tower B), accessed from the ramp on College Road.
- The provision of 283 cycle parking spaces for Tower A at basement level 1 accessed from the ramp on College Road and 180 spaces for Tower B located at second floor level with visitor spaces for both towers located at grade in the adjacent public realm.
- Public realm improvements, including the provision of a new colonnaded pedestrian and cycle link between East Croydon Station through to College Green.



3.2 The applicant proposes to construct the scheme as a modular building, meaning that each 'module' will be manufactured off site in a controlled manufacturing environment. The modular build method offers a wide array of unit types and incorporates a bespoke, contextual and crafted façade design. It would also allow the applicant to construct the

building within a substantially shorter timeframe than a conventional concrete frame building of this scale.

Site and Surroundings

- 3.3 The site is located on the southern side of College Road and was previously occupied by a car park at basement level which served the adjoining college. The land level within the site is below that of College Road. The site includes the access ramp to the east of the car park which serves the remaining College car park and servicing accommodation, the adjacent car park at Mondial House to the east and a Network Rail sub-station to the south east. The ramp also provides pedestrian access to the adjacent public car park (NCP/Fairfield Halls).



- 3.4 The surrounding area is mainly commercial in character, being occupied by offices, educational uses and the Fairfield Halls. 101 George Street, to the north of the site across College Road, is currently being redeveloped to provide a part 38/44 storey building with 546 residential units and flexible non-residential uses at ground floor. St Mathews House lies beyond to the north-west, also containing some residential accommodation. 102 George Street (Mondial House), located to the east of the site on the opposite side of the access ramp, is a 15 storey office building (with extant planning permission for the erection of a part 35, part 13, part 11 storey building comprising mixed residential, office and retail uses). Fairfield Halls, to the south east of the site, is currently finalising refurbishment, and there is a live planning application in that is being considered by officers for Fairfield Homes immediately to the south (more in planning history below).

Constraints

- 3.5 The site is within the Croydon Opportunity Area (Edge Area – covered by policy DM38.4) and Croydon Metropolitan Centre. The site is allocated (site 31) in the Croydon Local Plan (2018) for “*mixed use redevelopment comprising hotel and residential*”, with 159 homes projected to be provided. The justification for the option is as follows:

“The site is to be used to fund improvements to the remaining parts of Croydon College, who do not need the car park. Residential development will help meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area so is suitable for all town centre uses except retail.”

- 3.6 The site forms part of the Fairfield Masterplan area. A Primary Shopping Area lies immediately to the north extending west along George Street, which is a classified road. The site has excellent Public Transport Accessibility (PTAL 6B), being in close proximity to East Croydon Station (with West Croydon Station to the north-west) and numerous bus and tram links.

Planning History

- 3.7 There is a substantial amount of planning history on the site (and indeed surrounding sites), but the following applications are considered to be of most relevance:
- 3.8 06/00854/P - Erection of 29 storey building including 2 basement levels and plant areas at roof level providing a vocational college on the lower 10 floors, a fitness suite and plant area on 10th floor and 173 flats and a crèche on the upper floor; provision of associated parking in basement areas – Permission granted. This permission was not implemented and has now expired.
- 3.9 14/01603/P - Erection of part 16/38 storey building (plus basement and mezzanine levels) comprising 159 residential units, 225 bedroom hotel and restaurant (within use class A3); provision of associated amenity areas, landscaping and car/cycle parking and alterations/partial enclosure of access ramp – Planning permission granted. Works have commenced on site in pursuance of this permission.

College Green Hybrid - Land bounded by George Street, Park Lane, Barclay Road, and main London to Brighton Railway Line

- 3.10 16/00944/P - Outline planning permission for demolition and redevelopment to provide: flexible class A1 (shops) and/or class A2 (financial and professional services) and/or class A3 (food and drink); class B1 (business); class C1 (hotel); class C3 (dwelling houses); class D1 (non-residential institutions); class D2 (assembly or leisure); public realm and landscaping; and associated car and cycle parking, servicing, and access arrangements (with all matters reserved); and Full planning permission for demolition including multi-storey car park and Barclay Road Annexe; extensions and alterations to Fairfield Halls including class A3 (food and drink); erection of buildings for flexible class A1 (shops) and/or class A2 (financial and professional services) and/or class A3 (food and drink) and/or class D1 (non-residential institutions) and/or class D2 (assembly and leisure) and class C3 (dwelling houses); change of use of basement car park (part) to class D1 (non-residential institutions); public realm and landscaping; and associated car and cycle parking, servicing, and access arrangements – Permission granted

(NB. This was a hybrid planning application comprising full planning permission for Phase 1A and outline planning permission for Phase 1B, 2 and 3 with all matters reserved – the College Tower site formed part of the outline element)

Mondial House, 102 George Street

- 3.11 16/00180/P - Demolition of the existing office building; erection of a part 35, part 13, part 11 storey building comprising plus basement, to provide 220 flats, 1,787 sqm B1 office space, and 490 sqm A1 retail floor space with associated works – Permission granted. Not currently implemented.

101 George Street (Former Essex House)

- 3.12 17/04201/FUL – Redevelopment of the site to provide a part 38 and part 44 storey building with 546 residential flats, with the ground floor to incorporate a flexible space including retail (Class A1), cafe (Class A3), business space (Class B1) and gallery space (Class D1) uses with basement accommodating parking spaces, cycle storage and refuse storage, and associated hard and soft landscaping – Permission granted. Currently being implemented and nearing completion on site.

Land to the south east of Croydon College (directly adjoining the application site to the south)

- 3.13 19/04516/FUL - Erection of five buildings ranging in height from 7 to 29 storeys to provide 421 residential flats (Use Class C3), flexible commercial space at ground floor of Building A (Use Class A1/A2/A3) and Buildings C and E (A1/A2/A3 and/or B1/D1 or D2) together with associated cycle parking, public realm and landscaping, basement car parking, refuse storage, servicing and access arrangements – Under consideration, and not yet determined by the LPA

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the redevelopment of this site has already been established, bringing forward the regeneration of a vacant site.
- A part 49/34 storey tower comprising residential and co-living accommodation with commercial uses at ground floor is supported in principle and aligned with the desire for growth on the Croydon Opportunity Area and the site allocation.
- Co-living is an emerging residential product, the principle of which is supported by emerging New London Plan Policy H16.
- The provision of C3 residential is fully supported, all of which would be in the form of London Shared Ownership (equating to 30.5% by habitable room) which has been independently assessed as the maximum reasonable provision. .
- The proposal includes a policy compliant number of family units in the C3 tower.
- Against the backdrop of the 14/01603/P permission, a tall building is supported. The height and mass of the two towers has been assessed in relation to its impact from a wide range of viewpoints and found acceptable, including in relation to its impact on heritage assets.
- The design, appearance and detailed façade treatment of the development is of high quality as required for tall buildings.
- The provision of a new pedestrian colonnade linking East Croydon Station through to Fairfield Halls is fully supported.
- The living conditions of adjacent occupiers would be protected from undue harm subject to conditions.
- The living standards of future occupiers are satisfactory (in terms of overall residential quality) and the C3 homes would comply with the Nationally Described Space Standard (NDSS).
- The level of parking and impact upon highway safety and efficiency would be acceptable, subject to conditions and s.106 agreement.

- The environmental impacts, including wind, noise, air quality, land contamination and flooding, are acceptable subject to mitigation proposed through a combination of conditions and s.106 agreement.
- Sustainability aspects have been properly assessed and their delivery can be controlled through planning obligations and planning conditions.

5.0 CONSULTATION RESPONSE

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

5.2 The following organisations were consulted regarding the application:

The Greater London Authority (Statutory Consultee)

5.3 The GLA have made the following comments:

- The proposals do not demonstrate an adequate quality of accommodation for future occupants, and cannot be supported in their current form. This relates largely to the quantum of and access to the communal amenity spaces, in particular the kitchen facilities. Officers therefore consider that units would become self-contained as a result, where the incentive to use the communal spaces would be undermined by the quantity and ease of access.
- The provision of on-site conventional affordable housing is supported in principle, however the single intermediate affordable tenure is not acceptable. The viability is being scrutinised by the GLA to ensure the maximum amount is provided.
- The overall approach to urban design is supported.
- The applicant has provided a fire safety statement that demonstrates that all features and materials would comply with Part B of the Building Regulations, which should be appropriately secured in any decision.
- An increase in the total amount of long-stay cycle parking, with further details of the shared approach should be provided. Facilities to support deliveries by cargo bike should be considered. A contribution towards public transport capacity enhancements is also requested.
- Water and energy matters require resolution.

[OFFICER COMMENT: Continual engagement with the GLA has taken place throughout the pre-application and application process. As a result of discussions with the GLA during the application, the applicant has proposed the following amendments in order to address their concerns:

- An additional floor of communal cooking and dining facilities has been provided increasing the amount of overall communal space from 2,104sqm to 3,016sqm, reducing journey times to the kitchens and a reduction in the number of co-living units from 836 to 817. This increases the communal amenity space per person from 2.5 to 3.7sqm per person and the space devoted to catering from 567sqm to 1,331sqm.
- Further justification for the size and facilities within the other communal spaces including the laundry have been provided.
- We have had the viability independently appraised and are confident the 120 London Shared Ownership homes is the maximum reasonable.
- Further details of the bike hire scheme have been provided, and amended water and energy details.

- Conditions and s.106 obligations are recommended].

Transport for London (TfL) (Statutory Consultee)

5.4 TfL requests the following points are addressed for the application to comply with the transport policies of the London Plan:

- TfL support the improvements the applicant proposes to make to the surrounding highways network in their Active Travel Zone assessment.
- The public realm to the north and south of the site could be enhanced further to support the Healthy Streets agenda, for example providing seating.
- The amount of long stay cycle parking for the co-living units should be increased to accord with the minimum London Plan standards for C3 accommodation.
- A public transport contribution of £425,000 towards service capacity enhancements is requested.
- Details to be provided including for cycle parking, parking management plan, EVCPs, DSP and CLP

[OFFICER COMMENT: additional transport information has been provided in response to the comments made by TfL, including for the cycle hire scheme. The transport impacts are discussed in detail below, and conditions and s.106 obligations imposed. Note the £425,000 figure has been disputed by the applicant and officers are working with TfL to resolve the final amount to be secured]

Lead Local Flood Authority (LLFA) (Statutory Consultee)

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

Environment Agency (Statutory Consultee)

5.6 No response from the Environment Agency was received.

Historic England – Archaeology

5.7 The archaeology team at Historic England have confirmed that no further assessment or conditions are necessary with regards to archaeology.

Natural England

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

Thames Water

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

[OFFICER COMMENT: informatives and conditions imposed]

Network Rail

- 5.10 Network Rail requests the developer contact their Asset Protection team to discuss and agree an Asset Protection Agreement with them for any work in the vicinity of Network Rail land and infrastructure. Their generic comments relate to future maintenance, drainage, plant and materials, scaffolding, piling, fencing, lighting, noise and vibration and vehicle incursion and the need to contact them prior to works commencing would be attached as an informative to any planning permission granted [OFFICER COMMENT: informative imposed].

Metropolitan Police Service – Designing Out Crime Officer

- 5.11 The Designing Out Crime Officer has raised an objection to the scheme. As a result further information and amendments to the scheme have been provided. Final detailed matters can be resolved through the imposition of a condition, requiring liaison with the MPS once an operator has been secured and prior to occupation. This particularly relates to the security arrangements for the building (including size of the security team)
[OFFICER COMMENT: condition imposed]

National Air Traffic Services (NATS) Safeguarding

- 5.12 NATS Safeguarding have objected. To overcome this objection that have requested a condition be imposed requiring the submission and implementation (once approved) of a radar mitigation scheme, to be discharged in consultation with them. This is to mitigate impact of potential reflections of radar signals from Heathrow Airport and avoid false detections being sent to air traffic controllers.
[OFFICER COMMENT: condition imposed]

Gatwick Airport Safeguarding

- 5.13 No objection was raised.

Mid Croydon Conservation Area Panel

- 5.14 The Panel consider the proposal will be detrimental to the Conservation Area due to:
- Cumulative visual impact with the proposed scheme on the adjacent site
 - Hideous and uninteresting architecture
 - Detrimental impact through wind turbulence
 - Concern with the concept of co-living
- [OFFICER COMMENT: the points raised are covered within the material considerations below]

London Fire Brigade

- 5.15 London Fire Brigade requested an undertaking that access for fire appliances in accordance with the current Building Regulations and adequate water supplies for fire-fighting purposes will be provided.
[OFFICER COMMENT: additional information has been provided, conditions and informatives attached]

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by way of 19 letters of notification to neighbouring properties in the vicinity of the application site. Site notices were also erected in the vicinity of the site and a press notice published. Two re-consultations in the same terms took place following submission of (firstly) an updated wind and microclimate report, and (secondly) revisions to the scheme including the addition of an extra floor of amenity space and a reduction in the number of units. The number of representations received from neighbours in response to notification and publicity of the application are as follows:

No of individual responses: Objecting: 1 Supporting: 0 Comment: 2

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

Comment	Officer comment
Overdevelopment of the site	Addressed in Sections 1 and 4 of this report
Obtrusive and likely to overshadow public realm and Croydon College	Addressed in Section 5 of this report. In terms of the impact on the public realm and College, these are not residential properties and are therefore not subject to the same tests for amenity. Notwithstanding this, the principle of a tall building in this location has been accepted, and it is not considered that the impact on either the College nor public realm would be significantly worsened by the changes to the scheme, when compared with the extant consent. Adequate daylight/sunlight testing of an acceptable scope has been carried out.
Adverse effect on air flow (wind) in this location	Addressed in Section 8 of this report
The adjacent Fairfield Homes scheme is referenced as the “competition” scheme which is incorrect	This is a typographical error
The adjacent Fairfield Homes scheme is not listed in the wind and microclimate report under B3 on page 31	This is a typographical error
The wind assessment does not test the impact on the stairs between the podium and Hazeldean Bridge or at the entrance or corner of Block A of the Fairfield Homes scheme	The testing carried out is considered to be sufficient and reasonable

Queries on submitted Design and Access Statement	These are addressed in the relevant paragraphs below. Amendments and additional information received.
Application does not adequately represent the Fairfield Homes scheme	The surrounding consented and proposed development is understood and the information provided is considered sufficient to understand the relationships between the buildings.

6.3 Cllr Scott has referred the application to Planning Committee for a decision, in his capacity as Vice-Chair, raising the following issues:

- Potential to meet housing need through the provision of new homes, responding to local, regional and national housing targets
- Proposed affordable housing provision of 100% shared ownership with no social rented accommodation in contrary to policy

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a sufficient supply of homes
- Promoting sustainable transport;
- Achieving well designed places;

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

7.4 Consolidated London Plan 2015

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.11 Affordable housing targets

- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.14 Improving air quality
- 7.19 Biodiversity and access to nature
- 7.21 Woodlands and trees

Emerging New London Plan

7.5 Whilst the emerging New London Plan is a material consideration, the weight afforded is down to the decision maker linked to the stage a plan has reached in its development. The Plan appears to be close to adoption. The Mayor's Intend to Publish version of the New London Plan is currently with the Secretary of State and no response had been submitted to the Mayor from the Secretary of State. Therefore, the New London Plan's weight has increased following on from the publication of the Panel Report and the London Mayor's publication of the Intend to Publish New London Plan. The policies of most relevance to this application are as follows:

- SD6 Town centres and high streets
- D4 Delivering good design
- D5 Inclusive Design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public Realm
- D9 Tall Buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- H5 Threshold approach to applications
- H16 Large-scale purpose built shared living

7.6 Croydon Local Plan (CLP) 2018

- SP2 Homes
- SP6.3 Sustainable Design and Construction
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling

- DM16 Promoting healthy communities
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing floor risk
- SP7 Green Grid
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

7.7 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Homes for Londoners: Affordable Housing and Viability SPG, August 2017
- Croydon Opportunity Area Planning Framework (adopted by the Mayor and Croydon), 2013
- Fair Field Masterplan, 2013

8.0 MATERIAL PLANNING CONSIDERATIONS

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

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

Principle of Development

8.2 At the heart of the National Planning Framework 2012 (NPPF) is a presumption in favour of sustainable development which meets social, economic and environmental needs, and attaches great importance to significantly boosting the supply of new housing.

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

8.4 The site is allocated (site 31) in the CLP (2018) for *“mixed use redevelopment comprising hotel and residential”*, with a projected 159 homes on site. The justification for the option is as follows:

“The site is to be used to fund improvements to the remaining parts of Croydon College, who do not need the car park. Residential development will help meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area so is suitable for all town centre uses except retail.”

- 8.5 The site was formerly a car park in use by the College. Planning permission was granted in 2014 for a mixed use hotel/residential redevelopment, which this allocation relates to. As part of this former application the car park was considered ancillary to the educational use of the College and therefore a ‘community use’, protected by policy. Its loss to accommodate the development was justified at the time through a demonstration by the College that the car park was no longer required, and the sale of the car park would partly fund a planned expansion of the College’s further education provision.
- 8.6 Current Policy DM19.1 of the CLP (2018) protects community facilities. Ownership of the land has formally changed since the previous application, and development has commenced in pursuance of this planning permission and therefore the site as it sits today is not a car park associated with the College. Therefore no objection is raised in respect of policy DM19.1 of the CLP; the re-use of this existing underutilised site in a highly sustainable location can be supported.
- 8.7 In terms of housing numbers, the allocation suggests 159 homes (linked back to the 2014 permission). This scheme propose 120 C3 homes which is 39 short of that target. Whilst there is no currently adopted policy that sets out how co-living accommodation should count towards housing numbers, it is important to note that the emerging New London Plan suggests that units of non-self-contained communal accommodation (such as co-living) should be counted at a ratio of 1.8:1, when compared with traditional C3 units. On this basis the 817 co-living units would equate to 453 C3 residential homes. In the absence of a methodology other than that in the emerging New London Plan (where the weight afforded is down to the decision maker and equates to 453 homes) combined with the fact all 120 C3 homes to be delivered are affordable and the allocation is simply the previous consent, officers view is that the site allocation is met. The development comprises mixed uses but is clearly residential-led, with shared living proposed alongside traditional residential flats and would deliver a significant number of new dwellings in the town centre. The site is in a central location with excellent access to public transport, local shops and services and is therefore well placed for residential-led development of a higher density than was previously consented, and indeed for a large scale shared living scheme.
- 8.8 Whilst the Croydon Local Plan (2018) and current London Plan are silent on co-living accommodation, Policy H16 of the emerging New London Plan recognises the contribution co-living and shared living in general can make towards housing supply. Co-living is an emerging type of housing, which does not fall within a traditional residential use class, but is classed as sui-generis use. Whilst Local Plan policy SP2.7 seeks to ensure that a choice of homes is available in the Borough that will address the need for homes of different sizes, there is no specific policy reference to co-living. There are limited precedents for this housing typology in the UK, with only a small number of operators and there are currently no space standards for co-living accommodation.

8.9 For co-living schemes to be supported, emerging New London Plan policy H16 requires the following criteria to be met (these criteria, along with how the scheme complies with these, are discussed in more detail further on in the report):

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

8.10 The site sits within Croydon Metropolitan Centre, outside of designated retail frontage. Therefore, in terms of the ground floor uses, the principle of a community use (Class D1) on the ground/first floor of Tower B is acceptable, providing a link into the adjacent cultural quarter. A public café (Class A3) and co-living reception and cafe in the ground floor of Tower A (Sui-generis use as part of the co-living accommodation) is also supported, activating the ground floor frontage of this key public route. The applicant proposes to temporarily utilise the public café space for a marketing and leasing suite for the first year following occupation of Tower A, which is considered acceptable provided the use reverts to an A3 use following this period (to be secured by condition).

8.11 Policy DM4.3 of the CLP (2018) seeks to prevent ground floor units outside main and secondary frontages remaining empty. Whilst specific end users have not yet been identified for the ground floor units, the applicant will be required to market the units and provide fitting out for the eventual end occupier to ensure the unit is capable of occupation and operation. This is to be secured within a s.106 agreement. Overall the proposed ground floor uses are proposed to complement and signal entry into the Cultural Quarter, with the incorporation of a community/cultural space on the corner.

8.12 Local Plan policy SP4.5 encourages tall buildings in the Opportunity Area, subject to compliance with the Local Plan’s detailed policies and the Opportunity Area Planning Framework. Being located within the Edge Area of the Opportunity Area, the site is covered by policy DM38.4 of the Croydon Local Plan (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.

- 8.13 The scheme is for a mixed use development of up to 49 storeys comprising predominantly co-living (sui-generis) and residential accommodation (C3 use), with commercial and community floorspace on lower floors. Further to detailed consideration below, in building height and use terms the proposal accords with the policies applicable to the site and the principle of a tall building on the site has been established through the grant of the extant planning permission (14/01603/P).
- 8.14 Taking into account the above matters, it is considered that the erection of a high density residential focussed development within a tall building, incorporating A3 and D1 uses on lower floors would be acceptable in principle, subject to compliance with the other policies including meeting the criteria of emerging New London Plan policy H16. The scheme would result in the re-use of an existing underutilised site with the delivery of a significant number of new dwellings, which is supported.

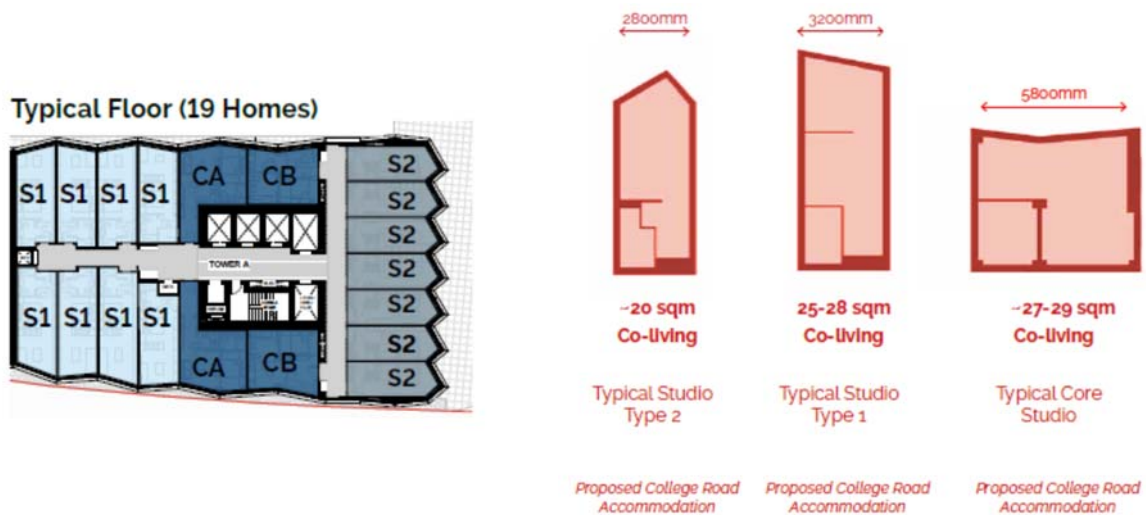
Housing Quality for Future Occupiers

Co-living – Tower A

- 8.15 Co-living is a sui-generis use and therefore not required to meet the minimum floorspace standards as required for traditional C3 homes. As noted earlier in the report, there are no specific standards for this type of housing product, in terms of the units themselves nor the amenity areas. Officers have referred to policy H16 of the emerging New London Plan for considering quality.

Unit sizes

- 8.16 Part 7 of this emerging policy states that whilst units must provide adequate functional living space and layout, they must also demonstrably not be self-contained homes nor be capable of being used as such – to remain distinct from traditional C3 residential accommodation.
- 8.17 Officers have worked extensively with the applicants to ensure the sizes and layouts of the co-living units are acceptable. From the outset the applicant has sought to deliver larger units, with research undertaken suggesting rooms within other operating co-living developments are too small, with rooms more comparable in terms of size and quality to student accommodation. For example rooms in developments operated by the Collective co-living are typically 11-16sqm. The applicant has also reviewed the Council's House in Multiple Occupation standards, which seeks a single bedroom of 10sqm. Comparison has also been made to the Nationally Described Space Standards minimum requirement for C3 residential studio unit of 37sqm and the ratio of person to area. The proposed layouts have sought to find an appropriate middle ground, with studio rooms ranging from 20sqm to 29sqm.



8.18 4 different types of unit size and layout would be available across each floor, maximising the choice for residents and enabling a more mixed community. Each unit would be fully furnished with integrated and adaptable storage, including a small kitchenette and en-suite bathroom. It is important to note that the kitchenettes would have limited cooking and food preparation facilities, ensuring the shared kitchen and dining facilities external to the unit are the primary amenities for residents (this is discussed further below).

8.19 Whilst there are no specific accessibility standards for co-living accommodation, there is level and lift access to all floors and provision has been made for two wheelchair accessible units per floor, which will be secured by condition.

8.20 The proposed units are considered to be of good quality and are functional in terms of size and layout, whilst remaining dependent on the communal facilities for primary living functions. Therefore officers are of the view the units are not self-contained homes nor are capable of being used as such.

Communal spaces

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

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

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

8.23 Commonly, the approach to other co-living developments in operation (or those consented) is to offer amenity in the form of kitchens or lounges for residents on multiple floors throughout the building. The applicants have carried out extensive research into co-living and other shared housing typologies both in the UK and internationally, alongside undertaking dialogue with prospective operators. This research suggests that there are issues with maintenance and management of these dispersed spaces, particularly in larger buildings. Research suggests that such spaces are then often underutilised by residents, who then prefer to use the larger and maintained centralised spaces.

8.24 The applicants have provided a comparison of the amount of amenity space provided within other co-living developments and other housing typologies to justify the overall amount and level per person. This research into co-living as a typology was extensive, but is constrained by the limited existing examples of comparable high-rise developments. Officers requested that a behavioural specialist and/or social anthropologist be appointed as part of the design team to assist in justifying the success of this unique housing model. This was not achieved, but the applicants did carry out a literature review, including the historic study 'A History of Collective Living', which provides data and analysis which has informed the design in many aspects. Examination of the most comparable examples has taken place, e.g. Urby in Jersey City, a 69 storey shared living tower with 762 rooms and associated amenity space. This has mitigated to a certain extent the lack of behavioural analysis, but some reservations remain as to the adequacy of the amenity spaces provided, including the variety and arrangement of spaces in terms of supporting a diverse and mixed community in future, embedded in Croydon as a place. This is why it is critical to ensure that an updated management plan and full credentials of the future operator (once decided) are secured through the s.106 agreement for approval, to get a full understanding of the use and day to day functioning of the building.

8.25 The communal amenity is split into the following:

- Ground floor: Café and reception
- Mezzanine: Café, amenity balcony and snug
- First floor: Kitchens and club room
- Second floor: Gym, studio, laundry, maker space, co-working
- 46th floor: Kitchens
- 47th floor: Social room, lounge/cinema, library, kitchen, dining
- 48th level: Rooftop amenity and terraces

Communal spaces	Size (sqm)		
Café and reception	96.5sqm	Co-working	171.2sqm
Café and amenity balcony	114.5sqm	46 th floor kitchens	518.5sqm
Snug	28.5sqm	Social room	152sqm
First floor kitchens	260sqm	Lounge/cinema	137sqm
Club room	201sqm	Library	40sqm
Gym	149sqm	47 th floor kitchens/dining	88sqm
Gym studio	49sqm	47 th floor dining	52.5sqm
Laundry	69sqm	48 th level rooftop amenity	396sqm
Maker space	69.7sqm	48 th level rooftop terrace	160sqm
Total			3,016sqm

8.26 Firstly focussing on catering, the scheme would provide 1,361sqm of communal catering facilities with 170 communal cooking points, equating to 1.7sqm per person (note this does not include the kitchenette facilities within each room) in a variety of different dining options including large shared kitchens, a café and hireable banqueting rooms. The applicant has done a lot of work on the catering capacity of the scheme and it has been significantly increased during the course of the application. Whilst 20% of occupants are able to cook independently at any one time, this must be considered in the context of not all occupants needing to cook at the same time, occupiers eating out and the ability to use a kitchenette in their own rooms. The applicant has evidenced with calculations that there are enough covers to accommodate all residents in the catering spaces at peak times.

8.27 In terms of other spaces, the scheme provides essential facilities such as the laundry as well as a variety of other types of social spaces and communal facilities on the upper and lower floors, including a gym, co-working spaces, contemplation room, cinema and roof terrace. Circulation spaces and corridor widths on each floor have been maximised with seating adjacent to lifts and within corridors to encourage social interaction and windows provided where possible to provide natural light. Officers consider the capacity of community spaces to accommodate residents at peak times has been adequately evidenced.

8.28 To address the other requirements of emerging policy H16, residents would have access to outside communal amenity space in the form of a rooftop amenity and terrace area on level 48. Convenient access to communal kitchens has been demonstrated through analysis of lift capacities and maximum travel times for residents to catering facilities. The proposed number of units per core (19) would be high, but given that co-living would not be C3 accommodation (the standards set by the GLA - generally 8 per core would therefore not apply) and the development is considered acceptable in terms of fire risk (covered below). Floor to ceiling heights would be appropriate, providing adequate standards in terms of ventilation and overheating. A

concierge, along with bedding and room cleaning facilities are to be provided for residents, which is to be secured in the management plan.

8.29 Overall, in the absence of space or quality standards for this typology, officers are satisfied that the location, size and arrangement of the communal spaces strike the right balance between future occupier amenity and management/maintenance pressures for the future operator. Further to engagement with the GLA the applicant has provided an extra floor of shared amenity (45th floor); the development would now provide 3 sqm per person internal amenity space for occupiers (3.7sqm including external space). It is interesting to note that this is nearly 5 times the internal communal space per person in Urby in Jersey City, for example and similar levels of spaces to other comparable international examples. The quality of the co-living accommodation is considered acceptable, subject to compliance with the management plan.

Other H16 requirements

8.30 The scheme is of good quality and design as covered above and contributes to mixed and inclusive neighbourhoods. The site is located in an area well connected to local services and employment by walking, cycling and public transport and its design does not contribute to car dependency. The scheme would be under single management (secured through condition) and the co-living units would be for rent with minimum tenancy lengths of no less than 3 months (secured through s.106 agreement). A management plan was submitted with the application and agreement of operator details (and further detail on the operation of the accommodation) are required prior to occupation, included as a condition.

8.31 The overall internal amenity for the co-living units when combining both the floorspace of the units and the communal space averages out as 27.3sqm per person across the whole building (excluding roof amenity and circulation spaces). This compares favourably with the NDSS requirement; with the exception of 1 bedroom homes that demand 37sqm and 39sqm per person, this exceeds the space per person from 2 bedroom homes and larger (25sqm per person for a 1B2P and 20.3sqm for a 2B3P).

8.32 Whilst officers are satisfied that the accommodation provided would constitute co-living to an appropriate standard, given this is a new typology the applicant has provided layout plans to show how the floorplates could be converted to C3 residential flats. This is a matter which was raised by Members at pre-application stage. Whilst a conversion would require planning permission, the applicants have demonstrated that the layout could be changed into NDSS compliant C3 flats with relative ease, without having to re-configure or re-service the entire building. This added safeguard is supported.

C3 residential accommodation Tower B

8.33 All of the proposed new units would comply with the internal dimensions required by the NDSS and would have acceptable layouts and room sizes. The scheme has been designed to ensure accessibility and inclusivity, with level access and accessible lifts provided. The proposal would meet the requirement of 10% of units to be wheelchair accessible M4(3) and all others can meet the requirements of M4(2), which is to be secured by condition.

8.34 Whilst the flats would not have private amenity space, this could only reasonably be achieved with balconies and given the façade treatment and building height this would be challenging in both visual impact and amenity of the spaces terms. The units are

oversized to an appropriate degree to compensate for the lack of external space, which is considered an acceptable solution in this context.

- 8.35 External communal space and child playspace is limited to the roof garden at level 34, which would have a total area of 330sqm. It is not feasible to provide any other external space due to the limited site footprint and proposed modular construction.
- 8.36 The proposal generates a requirement for 225.6sqm of play-space, of which 113sqm should be for under 5's. This is proposed to be provided within the communal roof area as this is as close to the units as possible, and is the only feasible way this would be provided within a constrained tower site. A condition is recommended to control the specific details. This leaves a shortfall of 113sqm for children over the age of 5, which cannot be accommodated on site (given the type of play equipment which would be required, and allowing for 117sqm for communal amenity space). The applicant has agreed to provide a financial contribution, based on the costs of equipping an area of approximately 113sqm with suitable equipment and including an allowance for future maintenance. Given the site constraints, along with the proximity to the Fair Field which is envisaged to incorporate some play elements, it is considered this is an acceptable approach in this instance to make up for the shortfall of on-site play equipment.

Designing out crime

- 8.37 London Plan Policy 7.13 states that development proposals should contribute to the minimisation of potential risks, and development should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help defer its effects. The Croydon SPD No. 3: Designing for Community Safety sets out guidance for minimising risk, including maximising natural surveillance; creating spaces which foster a sense of ownership; activity levels; and management and maintenance provisions.
- 8.38 Engagement with the Metropolitan Police Designing out Crime officers has taken place during the course of the application. In response to concerns raised, particularly arising from the co-living element, amended layouts and an updated management plan have been received, as well as a detailed response. Conditions are recommended to require the applicant to continue engagement with the Police prior to occupation and discuss Secured by Design accreditation.

Daylight/sunlight and outlook for future occupiers

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

Tower A (co-living)

- 8.40 The entire floorspace of each co-living unit (excluding the bathrooms) were tested to understand daylight/sunlight penetration through to the rear of the rooms. As with the daylight/sunlight testing for adjoining occupiers, the assessment takes into account the varying future surrounds scenarios to appreciate the realistic standard of accommodation as surrounding development comes forward.
- 8.41 This is of particular importance given that there are north facing single aspect co-living homes adjacent to 101 George Street. Whilst the west facing units have generally unrestricted outlook over the College, access to daylight is challenging on the northern and eastern elevations on the lower floors (particularly the units on the north eastern

corner) which are closest to surrounding development (including the consented scheme for 102 George Street to the east). The results show that 83% of the co-living units would comply with BRE guidance for access to daylight and 60% of the units would meet the BRE targets for sunlight. Many of the units have a relatively deep footprint with a central kitchenette, limiting sunlight penetration into the inner section of the unit. However, the layouts are such that the living space and kitchenettes are located closest to the windows with the bedspaces further into the footprint, which is considered to mitigate this to some degree.

- 8.42 A small sample of communal areas were tested for access to daylight, given the dependence of the co-living units upon these spaces. Both rooms tested (the contemplation room and one of the breakout spaces) achieved good ADF results demonstrating they will be well lit, although it should be noted this is a small sample. The roof terrace would achieve at least 2 hours of sunlight on 21st March, meeting BRE sunlight targets for outdoor spaces.
- 8.43 It must be noted that co-living as a sui-generis housing typology is not strictly subject to the guidelines for access to daylight and sunlight as traditional C3 homes are. The units are defined as non-self-contained, and as such residents are not dependent on the unit for their sole living area and would utilise the communal internal and external areas as an extension to their home. The applicants have taken steps to design in larger and angled windows on the northern façade to maximise access to daylight for residents, in an already constrained area in a town centre location with dense surrounding development. Officers are satisfied with the quality and layout of the units in other respects. Taking a balanced view when noting the requirements of emerging New London Plan policy H16, and weighing the other merits of the scheme, as well as the 2014 permission, flexibility to be afforded to the BRE guidance and town centre location where high density development will inevitably impact on daylight and sunlight for future occupiers, this is considered acceptable.

Tower B (C3 accommodation)

- 8.44 In terms of the units within Tower B, the corner units on each floor are dual aspect with a southern outlook. The west facing flats have unrestricted outlook over the College, whilst the east facing 1b2p flats face the lower height of the consented scheme at 102 George Street. Therefore daylight/sunlight levels are less challenging than for the co-living accommodation, however the testing still identifies lower lighting for rooms on the eastern flank in particular on the lower floors. This is particularly apparent for the living/kitchen/dining space for the 1b2p unit, which has a relatively deep footprint and a north east facing window towards the tallest element of the 102 George Street scheme. Overall, 98% of rooms would meet BRE targets for daylight and 79% would achieve target levels of sunlight. This percentage is marginally lower (98% daylight and 73% sunlight) within a scenario where the consented Fairfield scheme is built, compared with the Fairfield scheme currently proposed. The roof terrace would achieve at least 2 hours of sunlight on 21st March, meeting BRE sunlight targets for outdoor space. BRE guidance does recognise that sunlight criteria cannot be fully achieved in flats due to orientation constraints and density. Given the very good levels of internal daylight through the development and the recognised constraints for developments such as this in achieving high internal sunlight levels, it is considered overall that the daylight and sunlight levels afforded to future occupiers of this development would be acceptable.

Affordable Housing, Mix and Density

Affordable housing

- 8.45 The CLP (2018) states that to deliver affordable Class C3 housing in the Borough on sites of ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rented homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified.
- 8.46 In terms of co-living, the above policy would not apply as the use class is sui-generis and not C3. The only policy covering co-living schemes (or purpose-built shared living) is policy H16 of the Emerging New London Plan, which requires co-living accommodation to deliver a cash in lieu contribution towards conventional C3 affordable housing. This is because C3 standards do not apply to co-living (there are no standards) and a requirement of registered providers is for homes to meet the national space standards, which they do not. The policy directs that this should be sought either as an upfront cash in lieu payment to the Local Planning Authority (LPA), or by way of an in perpetuity annual payment to the LPA. In both cases the contribution provided is expected to be the equivalent of 35% of the units (to be provided at a discount of 50% of the market rent). This envisages the scenario that a scheme is entirely for co-living.
- 8.47 A key benefit of this scheme is that traditional affordable residential accommodation can be delivered on site, as opposed to a cash in lieu payment towards off site delivery, which would be the case for a wholly co-living scheme. The 817 co-living units within Tower A cannot be secured as affordable housing. However the entirety of Tower B (120 units) would be provided as C3 affordable housing (intermediate tenure, in the form of London Shared Ownership), equating to 30.5% by habitable room across both towers. The application was subject to a viability appraisal, which was scrutinised independently for the LPA. This included scenario testing specific to the requirements for co-living set out in the draft policy H16 of the emerging New London Plan. The results of the appraisal review and scenario testing is that there would be a viability deficit, even with the 30.5% offered.
- 8.48 The proposed affordable housing offer is therefore considered the maximum reasonable, providing 120 shared ownership homes with a mix of sizes including family homes, alongside 817 homes for co-living, catering to a different need within the housing market suitable for this highly sustainable location. No additional affordable housing (in percentage or affordable rented terms) could be viably provided, and early stage and late stage review mechanisms are recommended for inclusion within the s.106 agreement to account for any potential uplift. Taking this into account, alongside the key public benefits from the scheme (including delivery of the pedestrian route through to Fair Field) the level of affordable housing is supported.

Mix of accommodation

- 8.49 Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings. In central settings with high PTAL ratings, the requirement is 20% of units to have 3 bedrooms or more (a minimum of 5% in Retail Core Area of the Croydon Opportunity Area and 10% in 'New Town' and East Croydon as defined by the Opportunity Area Planning Framework).

- 8.50 Each typical floor comprises a 1b1p, 1b2p, 2b3p and a 3b4p unit, equating to 30 x 1 bedroom 1 person units, 30 x 1 bedroom 2 person units, 30 x 2 bedroom 3 person units and 30 x 3 bedroom 4 person units. Therefore 25% of the C3 residential units are for family occupation, which would meet the associated policy requirement.
- 8.51 As the co-living element is sui-generis Policy DM1.1 does not comply. The scheme would deliver a large number of high quality co-living units to be occupied by single persons. Overall, officers are satisfied with the unit mix provided within the scheme.

Density

- 8.52 Based on the public transport accessibility level (PTAL 6b) and the site's central characteristics, the London Plan density matrix suggests a residential density of between 650-1100 habitable rooms per hectare and 140-405 units per hectare for the application site.
- 8.53 The residential density of the proposal would be 5,885 habitable rooms per hectare which would far exceed the upper limit of the indicative range within the London Plan for a central area. It is important to note that the density matrix was designed for C3 residential and not co-living. Officers have taken the worst case and included each of the 817 co-living units as a habitable room in the density above. Excluding the co-living units results in a purely C3 density of 1,800 habitable rooms per ha or 600 units per hectare. Whilst this is still an exceedance of the guidelines, the site is within the centre of the Opportunity Area, where significant growth is expected to be accommodated and the supporting text of Policy 3.4 of the London Plan confirms that the density matrix should not be applied mechanistically. Critically, the site allocation of 159 homes would also have exceeded the density matrix. The London Plan Examination in Public: Panel Report (October 2019) confirms that about half of developments permitted since 2004 have been outside the matrix ranges, thereby casting doubt over its effectiveness. It goes on to state that enforcing a strict upper limit on density runs the risk of stymying otherwise acceptable development. The correct approach is to set density on the basis of local context.
- 8.54 The proposed development has been designed to deliver new homes within a building that responds to its local context, taking into account both the physical constraints of the site and its relationship with neighbouring properties and the nearby townscape. Furthermore, the Mayor's Housing SPG and emerging New London Plan removes the density matrix and requires higher density development to have greater scrutiny, endorsing design review panels as an appropriate method. As discussed above, the scheme was presented to our Place Review Panel.

Townscape and Visual Impact

Massing and townscape

- 8.55 The extant scheme comprised a part 16 part 38 storey tower. The proposed scheme would retain a similar stepped building form, but would increase the height of the taller element (Tower A) to 49 storeys and the lower element (Tower B) to 33 storeys. It is worthy of note that modular construction methods proposed allow depth efficiencies, resulting in each storey being shorter in height than a typical build-up. Therefore the literal increase in storeys is not so significant.



- 8.56 The building heights would step up from George Street with the increase in height to Tower A from the consented scheme. Whilst this was not envisaged within the Fair Field masterplan, this is considered to be beneficial in massing terms (particularly in long range views) to differentiate from the immediate neighbouring scheme to the north at 101 George Street (there would be a difference in 5 storeys). The height of Tower B would be visually level with Block A of the proposed Fairfield scheme. As such, the towers would sit within a medium to tall cluster at a gateway location into the cultural quarter.
- 8.57 Initial concerns were raised by officers regarding the additional height proposed to Tower B. This related to the potential for the additional massing to detract from the slenderness of the taller tower, and the potential for the scheme to coalesce with surrounding buildings (in both existing and emerging context). However, design work has taken place to incorporate differentiation between the two towers and balanced against the provision of affordable C3 housing, the massing is considered acceptable.

Elevational Design

- 8.58 The concept for the scheme is to create two conjoined towers that are related but different, through façade articulation, texture and materiality. The starting point for the design approach was to seek to draw upon and articulate a contemporary reinterpretation of the mid-century heritage of Croydon in its expression. Officers have worked extensively with the applicant to ensure this is articulated robustly on the façade both in form and materiality, and is distinct from surrounding design approaches to give the building its own identity within this cluster.
- 8.59 An angled, pleated undulation has been applied across both of the tower elevations and helps to provide visual slenderness, whilst referencing some of the forms found within mid-century buildings within Croydon such as Corinthian House and No.1 Croydon. This is successfully reinforced through the use of a texture applied to alternating facets of the angled elevation 'pleats'.



- 8.60 The proposal employs two design moves in order to differentiate the two towers, a concern during the pre-application process. Firstly, through the design of the fenestration openings, Tower A takes the approach of elongated windows which are exaggerated through a darker toned cladding. These become increasingly foreshortened to the base of the tower to provide greater elevational variety. On Tower B, these windows are squarer and read as punched openings, leaving greater areas of white cladding. This ensures that Tower B's façade reads as visually more solid than Tower A and avoids the mass merging into one, particularly when viewed from a distance. This is clear in east and west views which have been tested, where the towers appear as two conjoined forms. The second design move is the design of the textured treatment to the terracotta (proposed for the façade), which is in a finer grain on Tower A to further differentiate between the two towers. This has the potential to achieve this, however the exact articulation of this requires further development to ensure it is effective in strengthening the differentiation between the two forms. This will be controlled by condition.
- 8.61 The articulation of the top of the tower distinguishes it from adjacent buildings, in particular the crown of 101 George Street which has a close relationship to the site in mid and long range views. The proposal has begun to develop the detailed articulation of this with some success. However, the design will require additional development through condition to ensure the proportions and articulation of the crown further strengthen the design.
- 8.62 Similarly the articulation of the podium levels of accommodation are expressed reasonably clearly in this elevational treatment. However, as with the crown, officers feel there is a requirement for this to undergo further design refinement to ensure that it reads as clearly distinct from the two tower forms. Refining the termination of the

Tower A and B junction detail and the height of the cladding and glazing bands will need to form part of this further work, to be secured by condition.

Materiality

- 8.63 The predominant material for the building façade is terracotta, which is supported in principle as it is robust and can achieve a variety of finishes and forms. It also has the ability to incorporate texture, tone and finish as well as colour variety, and the design has begun to explore several means of taking advantage of these qualities, for example the proposed alternating fluted texture of the white terracotta on the façade pleats. Given this is the same material as is being utilised on the modular 101 George Street development to the north, it is critical that the terracotta used is different to ensure these adjoining schemes retain separate identities.
- 8.64 The predominant finishes are a matt white across the majority of the facades and glossy black within the reveals. This creates a distinct contrast in tones which in principle is supported. There remain some concerns that the contrast of these may be too stark, however, whilst work has begun on exploring the variety of finishes and detailed articulation of the façade forms, it is recommended to impose a detailed set of conditions to continue this work post-determination. The cladding will also need to work on both a micro and macro scale and so further work will include rigorous material testing and will be done in partnership with a ceramicist to ensure, particularly the matt white cladding, is not too flat in appearance.
- 8.65 The approach the proposal takes to delivering public art is divided in three ways; firstly it is to engage a ceramicist to develop the finishes of the cladding above the podium level; secondly, is through the lighting strategy; and thirdly, the applicant has committed to work with a ceramicist to develop a piece of public art in a ceramic material pallet for the colonnade. This includes the large areas of blank façade, the columns and the soffits. The applicant was directed to draw inspiration from the mid-century sculptures within Leon House by the artist William Mitchell.
- 8.66 The applicant has identified a ceramicist to work with already, who has experience with working on tall building facades (specifically Mapleton Crescent, a 27 storey building in Wandsworth). Officers are satisfied with this approach for the upper levels. The colonnade will require a more in-depth selection process given the large extent of area and huge potential to create a significant piece of public art along a key route into the emerging Cultural Quarter. Officers' strong preference is for the applicant to write a public art strategy and implementation plan before tendering to a selection of artists based on the criteria set. Officers request they are able to participate within this process and review final designs and samples of the selected artist. The lighting will have to work with and compliment all elements of the architectural expression and will be developed in collaboration with the emerging façade designs. Conditions are recommended accordingly.

Public realm

- 8.67 An absolutely critical element of the delivery of this scheme is the key portion of the level access pedestrian route from East Croydon Station through to College Green. This is identified within the Fair Field Master Plan and its implementation is crucial in providing a high quality, easy and legible link from the Station into the Cultural Quarter through to Fairfield Halls, the Fair Field (formerly College Green) and beyond through to Mid-Croydon and Park Hill Park. This has been considered by the applicants with officer input from initial pre-application discussions and throughout. This has included joint workshops which have taken place to ensure co-ordination of the applicant's

designs with the public realm design for the Cultural Quarter, including managing the land level change and interfaces between the sites, in particular 101 George Street to the north and Fairfield Homes site to the south, as well as the Fair Field competition scheme.



8.68 As part of these workshops the applicant has committed to continuing the work with the adjoining developments to ensure the delivered public realm is as coordinated and consistent as possible. In particular a commitment has been made to carrying through the emerging public realm designs of the Fair Field public realm scheme to achieve a consistent treatment and reinforce the route into the Cultural Quarter.

8.69 The route would be provided through a colonnade, as was proposed through the 2014 consent, hence establishing this as an acceptable approach. Work has focussed on making the route as wide and visually accessible as possible for a high quality legible route, and making this as safe and active as possible, rationalising the number and positioning of columns with a cylindrical shape to ease access through and improve legibility. The route has also been widened by removing one of the footpaths down the service ramp. Views have been tested along the route which are considered acceptable.

8.70 To support the functioning of the public route, active frontages are being implemented along the colonnade with a D1 use proposed at the southern end of the building as you enter into the Cultural Quarter. An A3 use is proposed to the northern end of the building, providing public access into the building. Further discussions regarding the specific end users of the units will be held during condition discharge to ensure they are appropriate. Public access to rooftop level once a year is further being secured through the Section 106 agreement to maximise public benefit. In addition, the entrance lobby and residents café are located to the centre of the colonnade for maximum activation along the whole route.

Heritage

8.71 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of

preserving the building or its setting or any features of special architectural or historic interest which it possess. With regard to conservation areas (at section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance.

- 8.72 The NPPF places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets, and affords great weight to the asset's conservation. At paragraph 193 it states that:

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

- 8.73 Any harm to a designated heritage asset, including from development within its setting requires “clear and convincing justification” (paragraph 194), with less than substantial harm weighed against the public benefits delivered by the proposed development (paragraph 196). The NPPF requires a balanced judgement to be made in regard to the effects of a development proposal on the significance of non-designated heritage assets (paragraph 197).
- 8.74 Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets, and Policy DM15 permits tall buildings which relate positively to nearby heritage assets.
- 8.75 The setting of a building is defined as ‘the surroundings in which a heritage asset is experienced’ in the glossary to the NPPF. ‘It’s extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance of may be neutral.’
- 8.76 The site is not within a Conservation Area (CA) and there are no designated heritage assets either on or immediately adjacent to the site. The development will join a cluster of consented and emerging tall building but it will be visible in the setting of nearby heritage assets due to its height and form.
- 8.77 A heritage statement was submitted as part of the Design and Access Statement. This assesses the impacts of the proposal on a range of nearby heritage assets, accompanied by views. Officers have also undertaken their own assessment of the impacts and are of the view that there would be some less than substantial harm to heritage assets, assessed in more detail below.

Chatsworth Road CA

- 8.78 Chatsworth Road CA, to the south of the site, contains a substantial grouping of late Victorian and Edwardian houses, many of which are of high architectural quality and fifteen of which are Locally Listed. Whilst the additional height of both towers would be visible from the Conservation Area, this would be comparable to the extant scheme in terms of visual impact and would be seen against the backdrop of 101 George Street, and beyond the consented Fairfield scheme in the foreground. The view from the south would be of the most slender proportions of the towers, with the distinction between the heights of the two elements clearly visible. The Chatsworth Road CAAMP acknowledges that the CA is located in close proximity to the town centre with existing and proposed tall buildings visible in the longer views, which forms part of the setting

of the CA. Overall it is considered the harm to this heritage asset would be less than substantial.



Central Croydon CA

8.79 Central Croydon CA is the commercial and civic heart of Croydon. Its street layout is largely medieval in original and it retains much of its plan form and historic fabric. Key views are identified along its length including a locally designated long view of the NLA tower from George Street, where the Tower A would be visible. The additional height is considered to result in minimal additional visual impact on the designated view when compared to the extant scheme and in the context of the surrounding area and tall buildings. To the south, Queen's Gardens is also included in the CA. From here, the enlarged massing of the development is at its most apparent and coalesces to some extent with 101 George Street. The proposed increases the dominance of the development on the setting of the CA in this location. It is however viewed in combination with existing and consented tall buildings. The proposal is considered to cause less than substantial harm to the Central Croydon CA.

8.80 From Queen's Gardens and Park Lane, the development is viewed across the roofscape of Croydon College and Fairfield Halls which are locally listed buildings immediately outside the CA. Both locally listed buildings are significant pieces of mid-20th century architecture which form an important part of the development of Croydon at this time. The enlarged massing of the development similarly increases the dominance of the development on these locally listed buildings causing some modest harm to their significance.



8.81 The CA includes the 16th century Grade 1 listed Whitgift Almshouses which have outstanding national historical and architectural significance. As per the extant scheme, the development will be visible in views of this building from North End, as a momentary glimpse in the valley between the western gable and the former Alders building, albeit with minor increased prominence given the additional height to Tower A. Taking this into account, with the overall view of the roof form remaining unimpacted, the proposal is considered to cause less than substantial harm to the setting of the Whitgift Almshouses.

Croydon Minster

8.82 The scheme will be visible in views of the Grade I Listed Croydon Minster. This building has high historic interest and community value. Only the very top of the tower will be visible near to the north aisle of the church and without coalescing with 101 George Street. Whilst it will affect the skyline and setting, this will be a momentary glimpse of the building and the church tower silhouette in the foreground will remain the prominent feature. This impact is considered to result in less than substantial harm to the setting of the Minster.

Harm and Public Benefits

8.83 No direct harm to the fabric of any heritage assets would occur as a result of the proposal, however it would cause some less than substantial harm to the settings of the key heritage assets identified above.

8.84 The extant proposal is a benchmark for the level of harm caused to the heritage assets. A scheme within the massing parameters of this extant permission would result in less harm to the assets, but critically would not deliver the scheme's key benefits in terms of affordable housing and realising the Council's aspirations for a high quality pedestrian route through from East Croydon station into the Cultural Quarter. Officers are of the view that the benefits of the proposal could not be achieved, without that level of harm. Those benefits, accompanied by the minimisation of the accompanying harm, offer clear and convincing justification for the harm to heritage assets identified above.

8.85 Having concluded that the scheme gives rise to "less than substantial harm" it is necessary to weight that harm against the public benefits. As set out above, a reduced scheme would be less beneficial in terms of affordable housing delivery and provision

of high quality pedestrian route and public realm. Therefore, the public benefits weight against the scheme are as follows:

- The delivery of a significant quantum of housing in this highly sustainable location, contributing positively to the borough's housing stock
- A significant proportion of affordable housing
- Delivery of high quality public realm including the critical pedestrian link from George Street to Fair Field
- The opportunity to make optimal use of land which is currently derelict and underutilised

8.86 Officers are of the view that those public benefits would outweigh the harm caused to the various heritage assets. Officers are satisfied that the approach adopted by the applicant in terms of design, heritage and townscape is sound and can be supported.

8.87 The planning application site lies in an area of archaeological interest. Historic England have advised that no further archaeological investigations are needed.

Residential Amenity of Neighbours

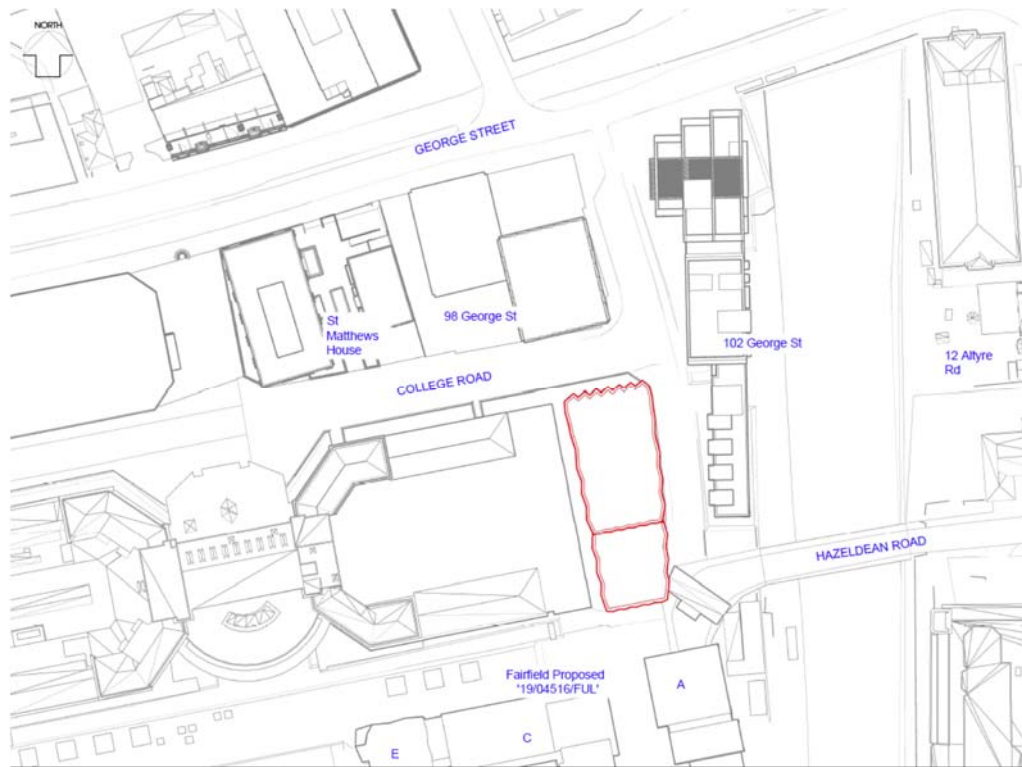
Outlook and privacy

8.88 In terms of outlook and privacy, the most critical relationships to consider are the adjoining occupiers at 101 George Street, 102 George Street and the consented and proposed Fairfield schemes. There would be approximately an 18m separation distance to 101 George Street, and direct overlooking would be avoided through the angled fenestration. Block A of the proposed Fairfield scheme would be approximately 13m from the southern elevation of Tower B. The adjacent balconies proposed within the consented scheme for 102 George Street would be approximately 12m from the flank elevation, at the closest point. Whilst these are relatively close distances, these are to be expected in high density town centre schemes and has already been established with the permission in place, including this site and the hybrid application to the south.

8.89 Overall, separation distances remain similar to the consented scheme (albeit the uses are different), and given the density of this cluster of developments in a town centre location it is expected that there will be a degree of mutual overlooking and visual impact for occupiers, so is acceptable.

Daylight and Sunlight Impacts

8.90 Policy DM10.6 states that the Council will not support development proposals which would have adverse effects on the amenities of adjoining or nearby properties or have an unacceptable impact on the surrounding area. This can include a loss of privacy, daylight, sunlight, outlook or an increased sense of enclosure. There are a number of buildings surrounding the site, along with a number of planning consents granted (and schemes coming forward) in close proximity.



- 8.91 A daylight and sunlight assessment has been provided with the application, assessing the development's impacts on existing and future residents. This in general has considered the impact on the neighbouring buildings from the extant planning permission as a fallback position (as suggested by BRE guidance, 0.8 times the former value for the permitted scheme). This is an acceptable approach, although overall standalone tests for Vertical Sky Component (VSC), Daylight Distribution (DD) and Annual Probable Sunlight Hours (APSH) have also been analysed, as set out below.
- 8.92 To clarify, guidance suggests that if the VSC percentage difference is less than 27% and less than 0.8 times its former value then there would be an adverse effect. However, the BRE guidance allows alternative target values; given the town centre location an 18% threshold guideline has been used.

101 George Street (Formerly Essex House)

- 8.93 At the time of the previous planning application, a residential proposal for the site immediately to the north was under consideration (planning reference 14/01594/P). Whilst planning permission was granted, this was not implemented and a later planning permission was granted for redevelopment (planning reference 17/04201/FUL) for a part 39 and part 44 storey tower comprising 546 residential units with commercial units at ground floor. This is nearing completion on site and thus consideration has been had to these future occupiers, where there are habitable rooms facing the site.
- 8.94 The VSC results show that out of the 684 windows assessed, 651 (95%) would fully comply with BRE standards when considering the consented scheme as a baseline. The remaining 5% constitutes 33 windows, but the difference between the consented and proposed VSC is within only 1% and almost all of these windows would achieve over 18% VSC. In terms of DD, 91% of the 432 rooms would meet BRE guidelines when compared with the extant scheme. Of the 38 rooms that fail, the margins are generally small and 29 are bedrooms where daylight is less important given the primary function of the room is to sleep. All rooms would achieve adequate sunlight levels in accordance with BRE guidance.

8.95 Taking all factors into account, it is considered the impact would be defined as minor adverse, taking into account the proportion of rooms affected. However in the context of the extant scheme having such a close relationship with the site, and the dense urban surrounds this impact is acceptable.

102 George Street

8.96 102 George Street is located to the east and north east of the site, and is currently occupied by an office block. A planning consent was granted in 2016 for redevelopment with a part 11-35 storey building providing 220 flats. The impact on daylight/sunlight has been tested for these units with outlook on the west and south facing elevations towards the site, which comprise a mix of bedrooms and living areas.

8.97 Those most affected in terms of daylight are west facing towards the site. 78% of rooms tested continue to comply with BRE targets for VSC, with the extant scheme as a fallback position. There are limited changes between the results for the extant and proposed schemes. 90% of rooms tested for DD meet the guidelines when compared against the consented scenario – of those failures (14 rooms), 9 are bedrooms (where daylight is less important) and the other 5 are marginal failures. For sunlight impact, generally the same rooms are most impacted upon on the west and southern elevation of the building (closest to the site). 81% of the windows meet the BRE targets for APSH. Out of these some would be poor and would likely experience a noticeable impact e.g. W13 serving a living room/kitchen/diner would lose 50% of its APSH, but this room is served by other windows.

8.98 Pass rates are generally 81-86% across all tests in comparison to the extant scheme, which would be as a result of the increased height of both towers. It is worthy of note that the planning permission for these units includes recessed balconies and projecting wings surrounding some windows as part of the design, which will already affect access to light within these units. It is considered the transgressions from the consented scheme would result in a minor adverse daylight/sunlight impact on the occupiers of these buildings but that these are within acceptable tolerances.

12 Altyre Road

8.99 12 Altyre Road is a residential property located on the other side of the railway lines approximately 95m to the east. In carrying out the assessment, the internal layouts are unknown, but all rooms with rear aspect have been assumed to be habitable as a worst case scenario. This is considered to be an acceptable approach. For the VSC test, 13 windows to the rear were analysed for daylight impact, and only 2 were compliant with BRE guidelines. W1 on the ground floor would achieve the lowest VSC value (6.51). However, these values were already low when compared against the consented scheme. Therefore although the impact would be worsened from the proposed scheme, the values are not significantly worse (generally around 1-1.5% worse) so this is considered to be a minor increased impact. In terms of daylight distribution, all windows would pass and this would not result in a change from the extant consent.

8.100 In terms of impact on sunlight, all windows would fail to meet BRE guidelines. However it should be noted that the failure is considered to be marginal, and this impact is not significantly worse when compared with the extant consent.

8.101 Overall it is considered this property will be the most affected, given the size of the dwelling and proportion of windows impacted for both daylight and sunlight which fail to meet BRE guidelines. Whilst this minor adverse impact from the additional height would be noticeable, it would only be marginally worse than that resulting from the

extant scheme coupled with the future surrounding consented/built development. This impact, when taking into consideration the town centre location, that the proposal is far enough away to avoid being unduly overbearing or causing privacy issues and the public benefits resulting from the scheme, is considered acceptable.

St Matthews House

8.102 To the north-west of the site on the northern side of College Road is St Matthew's House, a low rise building containing residential accommodation at first and second floor levels. This building is approximately 40-50m away to the north east. The residential units have windows in the eastern and southern flank walls. It is not known whether the rooms are habitable or non-habitable, but all have been assessed on the basis of being habitable as a worst case scenario.

8.103 For daylight impact considering VSC, 60% of the rooms would meet the targets set out in the BRE guidelines when compared with the extant scheme. Where the rooms would fail to meet the guidelines, the differences are generally marginal (around 0.3% difference). This is a similar scenario when considering DD, where 17 out of 19 rooms would meet BRE standards, with minor differences between the extant and proposed scheme. With regards to sunlight impact and testing APSH, all schemes would pass when compared with the extant scheme.

8.104 Overall, the adverse impact on daylight/sunlight, when compared with the formerly approved scheme and building surrounds, is considered to be marginal in the scope of the scheme. It should also be noted that the proposed scheme being built at 101 George Street, which sits directly adjacent to and projects beyond the rear of the affected windows, post-dates the extant consent and would have a more significant impact on this building than that proposed by the additional height of Tower A.

Fairfield Homes site to the south – consented and proposed

8.105 The impact on both the consented Fairfield scheme (16/00944/P) and the currently proposed Fairfield scheme (19/04516/FUL) has been tested for both daylight and sunlight impacts. Testing excluded blocks B and D, as these are furthest away from the development site and unlikely to be impacted upon, for e.g. Block B being set behind Block A which was tested. Similarly, not all floors have been tested – alternate floors have been tested which is common practice for tall buildings as it provides a representative sample of the effects without the requirement to model and analyse every room. The testing carried out is considered to be sufficient and an appropriate approach.

8.106 The consented Fairfield Scheme could form part of the future surrounds for development in this area. Across blocks A-C within the consented scheme, an average of 90% of windows tested would meet BRE targets for daylight (block B being the most affected – but still with 83% of windows meeting the guidelines). The two windows tested for sunlight levels (in block C) would achieve BRE targets.

8.107 For the proposed Fairfield scheme, 88% of windows would meet BRE target values for VSC. Those windows most effected would be closest to the site. For those falling short, it should be noted that the proposed results for block A would all achieve over the 18% urban target for VSC and those results for block C would constitute a minor difference to those reported for the consented scheme. Across blocks A-C, 98% of rooms tested would meet BRE guidance (3 rooms fail to pass) when considering the consented scheme as a benchmark, and all windows tested (taking into account orientation) would meet guidelines for sunlight.

8.108 Overall whilst there are some minor reductions when compared against the extant scheme in terms of BRE targets, it is considered either scheme, if built out, would achieve adequate levels of daylight and sunlight.

Daylight and sunlight conclusions

8.109 Whilst the proposed development would result in some daylight and sunlight impacts for surrounding properties, in the vast majority of instances where impacts beyond BRE guidelines occur, these are only minor in nature and where these impacts occur, good levels of daylight and sunlight are generally still maintained, especially considering the central location of the affected properties. It should be noted that daylight and sunlight impacts for surrounding properties beyond BRE guidelines are inevitable in an urban context such as this, which is why notable weight should be given to the assessment of the proposed development against the alternative baseline and target. The summary of the results given above confirms that a notable proportion of the impacts which occur are as a result of the most recent extant planning permission (the 2014 consent) and given the notable additional benefits proposed by this scheme (in particular the considerably higher proportion of affordable housing and delivery of a more generous public route) the harm of these additional impacts are considered to be outweighed by these additional benefits. As such the daylight and sunlight implications of the proposed development for surrounding properties are acceptable.

Microclimate

8.110 Paragraph 6.71 of the Croydon OAPF states that new buildings, in particular tall buildings, will need to demonstrate how they successfully mitigate impacts from micro-climate conditions on new and existing amenity spaces. In particular, new tall buildings in the COA will need to show how their designs do not have a negative impact on wind (downdrafts and wind tunnelling).

8.111 A wind tunnel assessment of the impact on the local microclimate has been undertaken. Given the number of consented and/or proposed developments in the vicinity of the site (including the extant consent on the site itself) and to fully understand the implications of the scheme in conjunction with all surrounding built form, the wind testing covers a number of different scenarios.

8.112 Modelling of the existing site identified no safety issues in terms of wind, and found that the environment was generally suitable for existing pedestrian uses. Testing of the proposed scheme within both the existing and proposed surrounds without any provision for wind mitigation identified a number of safety and comfort issues, in particular at the southeast corner of the development within the colonnade and at the northeast corner and upwards towards 101 George Street. Discussions on the appropriate level, design and location of mitigation to combat has taken place during the course of the application. The current scheme proposes mitigation in the form of planters surrounding the building, incorporating trees of varying heights. The planters at the southern end of the building are flush with the deck level, to maximise the openness of the pedestrian route through from the colonnade into Fair Field. Whilst the trees in terms of number and height would be sizeable in this area of the public realm, wind conditions within and immediately surrounding the site would meet the safety criteria (including in the critical southeast corner) and would in general achieve acceptable levels of comfort for pedestrian access to and passage through the site and onto George Street. Some localised areas would be marginally windier in the winter months, but where these occur the exceedance is relatively minor and so would be at least tolerable for proposed pedestrian usage. The proposed rooftop terraces would

provide some space suitable for sitting, with full details of the arrangement of the space (e.g. finalising the layout and potential to create more sheltered areas), to be agreed.

- 8.113 It is considered the design of the wind mitigation would ensure a sufficiently comfortable environment within the surrounds of the development. Implementation and maintenance of the wind mitigation is to be secured through the s.106 agreement, as well as the detailed design of the tree pits and their management to ensure establishment of and longevity of the planting to perform its function within the wider public realm.
- 8.114 Joint workshops are taking place to ensure co-ordination of the applicant's designs with the public realm design for the Cultural Quarter and the Fair Field competition scheme. As part of these workshops the applicant has committed to continuing the work with the adjoining developments to ensure the delivered public realm is as coordinated and consistent as possible; this includes continued design development of the wind mitigation and soft landscaping which will be secured through the s.106 agreement.

Highway Safety, Access and Parking

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

Car parking

- 8.116 The proposal is predominantly car-free, with the exception of the 15 dedicated disabled bays (11 for Tower A and 4 for Tower B) proposed in a lower basement level which form the extent of the total parking provision. This level of provision (3% of dwellings) is considered to be acceptable and would provide a satisfactory level for the wheelchair accessible units proposed.
- 8.117 The structural columns required for the towers mean some spaces are partially obstructed which is not ideal, however this was similarly the case for the extant planning consent and this has been designed out as much as possible. It is noted the emerging New London Plan requires a demonstration of disabled spaces for a further 7% of dwellings, in case these are needed at a later date. This further provision cannot be achieved on site given the small site area, and any further excavation to provide additional sub-basements (if this was feasible) would impact significantly on scheme viability. In any case, taking into account that the majority of units are for co-living, it is not considered further parking provision is necessary in such an accessible location. Resident's eligibility for parking permits would be restricted by the s.106 agreement and a Car Park Management Plan relating to the allocation of spaces would be secured through planning condition.
- 8.118 The parking spaces would be accessed via the ramp from College Road (extending partially under the College) similarly to the extant scheme. Sections have been provided to show that access can be achieved for the largest necessary vehicles under the sunken planters forming part of the public realm. Part of the existing ramp (approximately a footpath width) is proposed to be incorporated into the colonnaded public realm, in order to increase capacity for pedestrians on such a key route and maximise openness of the colonnade. The applicants have demonstrated this would not have a significant impact on pedestrian or vehicular safety, with access critically being retained into the adjacent Fairfield Homes site (19/04516/FUL) and the UKPN

power station to the south east. Detailed arrangements for the access and ramp are to be agreed as part of the s.278 works and public realm works to be secured within the s.106 agreement.

- 8.119 Local Plan Policy DM30 states that 20% of parking bays should have EVCP with future provision available for the other bays. The applicants have agreed to this in principle, with full details and provision of the EVCP to be secured by conditions.

Cycle parking

- 8.120 For the co-living accommodation, the applicant has applied the principle of shared living to the cycling facilities. 283 cycle parking spaces are to be provided within the upper basement for co-living residents of Tower A (equating to around 1 per 3 residents), with 130 of these to be for cycle hire spaces. The applicant has undertaken initial discussions with companies who provide shared cycling facilities for residential schemes who indicate this is feasible, and have analysed likely length, timings and frequency of rentals. Taking into account the limitations of the site area, the type of accommodation and the proximity of the site to public transport, it is considered this proportion of cycle parking for Tower A is appropriate. It is important that this hire scheme is only for residents, which will be secured by condition along with the full details once agreed, including provision for retaining the hire scheme but adapted for public use if necessary in future.

- 8.121 180 cycle parking spaces for Tower B would be provided at second floor level. Whilst not ideal, this is the largest area available on this tight site (allowing for plant and refuse storage in the basement) and a separate cycle lift has been provided from the basement up to the cycle store. The spaces provided would be in accordance with the adopted London Plan standards, which is considered acceptable and the maximum that could be accommodated on the site. Short stay visitor parking for the commercial uses is to be provided within the public realm area, along with staff cycle parking and changing facilities within the ground floor of Tower A. This is considered acceptable and would be secured by condition.

Car club

- 8.122 Policy DM30 of the Croydon Local Plan (2018) requires 5% of the total number of spaces to be provided as on-site car club spaces, with additional spaces at a rate of 1 space for every 20 spaces below the maximum overall number of car parking spaces as set out in the London Plan. In this particular case, it is considered more beneficial to secure improvements to existing car club spaces within the basement car park adjacent to the site (considered to fulfil current demand and which would still be easily accessible for residents). A financial contribution is to be secured through the s.106 agreement for 4 electric vehicle charging points given the number of units proposed, signing and lining and a signal booster, as well as car club membership being paid for the occupiers of the units, normally for 3 years. This is considered to be in accordance with the intentions of the policy, contributing to sustainable transport infrastructure.

Delivery and servicing

- 8.123 A Delivery and Servicing plan has been provided, stating all deliveries and servicing are to take place from the basement. Officers have carefully considered the likely transport and access impacts specific to a mixed co-living and residential scheme of this size, with public uses on the ground floors. For example, a high demand for deliveries and servicing in and around the building from vehicles, visitor cyclists and pedestrians as a result of a high number of residents. Pedestrian comfort level analysis has been undertaken taking account of full use and occupation of all the immediate

surrounding schemes. Given that there are limited comparative UK examples of co-living on this scale, it is considered necessary to require a bond to be secured against the projected delivery and servicing movements anticipated by the applicant. This will be monitored by the Council for a year, and can be reimbursed following expiry of this period if the projections are in line with what was envisaged. This is to ensure no adverse impacts on the local highways network from movements resulting from the co-living use, particularly given the cumulative number of developments and existing uses accessing from College Road. This is to be secured within the s.106 agreement.

Construction Logistics

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

Refuse collection and storage

- 8.125 The proposal includes bin storage in the basements of both towers, with a refuse collection bay and access points accessed from the ramp. Refuse is proposed to be collected 3 times a week for Tower A, and once a week for Tower B. Tower A would utilise a bin chute linking to the basement; full details of how this will be managed and maintained successfully (i.e. for residents with accessibility issues) along with detailed arrangements are to be required by condition, prior to occupation. This will also feed into the co-living management plan and tenancy guide to be given to residents on arrival, which will also be assessed prior to occupation.

Pedestrian flows

- 8.126 A Pedestrian Comfort Level (PCL) assessment has been carried out for the proposed walkway, to assess the cumulative impacts of the development (and the proposed Fairfield scheme) on the public space around the base of the development, in particular the colonnade. In accordance with guidance produced by TfL, this confirms that the 3.53m footway width along the colonnade would provide an acceptable level of comfort for pedestrians at peak times generated from both the proposed development and the Fairfield scheme.

Sustainable transport

- 8.127 Given that the development would be car-free (aside from disabled spaces) and taking into account the nature of the development, increased walking, cycling and public transport use is expected. The impact of additional development within the Croydon Opportunity Area, including the proposed development, is expected to require upgrades to existing services and therefore a sustainable transport contribution is to be secured in the s.106 agreement to mitigate the impacts of the development and secure improvements to include highway, tram or bus infrastructure.
- 8.128 The applicants have proposed upgrades to the local highways network to support the forthcoming development, including increased street lighting between Fairfield Path and The Avenue, improved signage and lighting at Park Lane/George Street crossing and improving signage across George Street and around the tram lines. Financial contributions to transport improvements including improving the town centre cycle network in the immediate vicinity of the site are also to be secured in the s.106 agreement.

Travel Plan

- 8.129 In order to ensure that the identified modal shift is adequately supported, and barriers to uptake of more sustainable transport modes can be addressed, a Travel Plan and monitoring for three years is to be secured through the s.106 agreement.

Environmental impact and sustainability

Flooding and drainage

- 8.130 The site is within Flood Zone 1 (low risk) and an area of surface water flood risk. There is limited potential for groundwater flooding to occur. The applicant has provided a Flood Risk Assessment and Drainage Strategy. This sets out a strategy for managing runoff from the various parts of the site using an attenuation tank and hydrobrake control. There are no external areas which could be used for SuDS as the building covers the entirety of the site, excluding hardstanding of road areas.
- 8.131 The Lead Local Flood Authority assessed the proposed scheme and following submission of additional information raise no objection. This is subject to a condition securing detailed design.
- 8.132 With regards to foul water and surface water network infrastructure capacity, Thames Water raised no objection. An informative is recommended to advise the developer that Thames Water underground water assets are located within 15m of the development, and water mains crossing or close to the development. Thames Water have requested a condition be imposed, requiring the developer to liaise with them to discuss the impact on the existing water network infrastructure, and whether upgrades are required to accommodate the development. This is included within the recommendation.

Contamination

- 8.133 The submitted contaminated land report concluded that there were previous potentially contaminative onsite land uses including a railway line, gravel pit, workshops and warehouses. Ground investigation works have been carried out and a remediation strategy for contamination proposed. A condition is recommended to ensure the development is carried out in accordance with the submitted documents, and require submission of a validation report detailing evidence of remedial works carried out.

Air quality

- 8.134 The entire borough of Croydon is an Air Quality Management Area (AQMA) and therefore careful consideration to the air quality impacts of proposed development is required. The submitted air quality assessment demonstrates that the development will be better than air quality neutral and thus compliant with policy 7.14 of the London Plan. Mitigation measures to minimise dust emissions during construction works are proposed, to ensure that any residual effects will be 'not significant'. Emissions from the generated traffic are considered to have a negligible impact on the local road network. Emissions from the proposed Boiler Plant will lead to impacts at the south-facing properties on levels 36 and 37 and one east-facing property on level 36 in Tower A, however this will be mitigated with mechanical ventilation to prevent impacts at these properties. Residual effects of road traffic emissions are not envisaged to be significant. A contribution of £19,380 towards air quality improvements to mitigate against these impacts will be secured via the s.106 agreement, with recommended conditions.

Construction Impacts

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

Ventilation

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

Light pollution

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

Sustainable design

Carbon emissions

- 8.138 Policy SP6.3 requires new development to minimise carbon dioxide emissions and seeks high standards of design and construction in terms of sustainability in accordance with local and national carbon dioxide reduction targets. This requires new build, non-residential development of 1000sqm and above to achieve a minimum of 35% CO₂ reduction beyond the Building Regulations Part L (2013), and new build residential development over 10 units to achieve the London Plan requirements or National Technical Standards (2015) for energy performance (whichever is higher).
- 8.139 The policy also requires the development to incorporate a site wide communal heating system and to be enabled for district energy connection.
- 8.140 The applicant has provided justification that Tower A should be assessed against the non-domestic non-residential targets for carbon emissions. This is largely on the basis that the use class for co-living accommodation is sui-generis and the units are not self-contained, being dependent on the spaces external to the unit e.g. kitchen and dining areas. Officers consider this to be a reasonable assumption, with the traditional residential accommodation within Tower B assessed against the standard domestic methodology.
- 8.141 Overall, across the whole development, a reduction in regulated CO₂ emissions of 40% over current Part L Building Regulations (2013) is expected to be achieved. The remaining regulated CO₂ emissions shortfall would be covered by a carbon offset payment which would be secured through the s.106 agreement.
- 8.142 Whilst no existing district heating networks currently exist, the site is within an area where one is planned. Consideration was given to the use of a CHP (Combined Heat and Power) system but this was discounted in favour of alternative low carbon solutions including an air source heat pump and a low emissions gas-fired boiler. However, such a system would not be compatible with a District Heating System which is planned for the future. Drawings of the plant room have been provided showing how the building would be designed to connect into a future network, including space for the future substation and ducts for incoming pipes. A s.106 obligation is also recommended requiring connection to the District Heating System if the Council has appointed an operator before commencement on site, or a feasibility into connection to a future system on first replacement of the heating plant. On this basis, as the proposal

complies with the above requirements regarding carbon reduction and a CO2 offset payment, subject to a condition requiring the above standards to be achieved, the proposal is considered acceptable.

- 8.143 Both blocks can achieve the on-site carbon dioxide reductions as required by policy. Sustainable design and construction measures have been designed in where feasible, including measures to address overheating within the units. These matters are to be secured by condition.

Water use

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

Other planning issues

- 8.145 A health impact assessment was submitted which identifies that the proposal will have a positive impact on the majority of health factors including provision of homes, improving connectivity to the public realm and local services, and would have a neutral impact in terms of highway safety, construction impact and noise. Planning obligations and conditions are recommended restricting car use and securing highway improvements, noise and disturbance from commercial units and construction, along with other measures to avoid unacceptable health impacts. The development is liable for a Community Infrastructure Levy (CIL) payment to ensure that development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities.
- 8.146 Although fire safety is predominantly a building regulations issue, draft policy D12 of the emerging New London Plan requires developments to achieve the highest standards of fire safety for all building users. The policy sets out a number of requirements, with the submission of a Fire Statement (an independent fire strategy produced by a third party suitably qualified assessor) setting out how the development has been designed and will function to minimise fire risk. Both buildings will be fully sprinklered (including the co-living amenity spaces), have comprehensive fire detection and alarm systems and incorporate features such as a 120-minute fire-rated enclosed stair and fire-fighting lift. As a managed building, Tower A will be subject to a fire evacuation strategy with a designated assembly point, details of which will be provided to residents on agreement of tenancy. It is considered the submitted details are sufficient to address, at this stage, the development's fire safety implications from a planning perspective. The development should comply with the fire statement as an approved document, with a condition recommended to secure full details of fire safety measures once the next stage of design work is complete, including materials and construction methods, evacuation points and any requirements incorporated as a result of discussions with the London Fire Brigade (e.g. specific locations for fire appliance access points and wet riser outlet locations). Furthermore, the GLA confirmed the Fire Statement was acceptable and should be secured by condition.
- 8.147 An EIA Screening Opinion was issued prior to the submission of the planning application. Consistent with the former planning permission, the development was not

considered to require an EIA, taking account of its location, nature, scale and characteristics.

- 8.148 A TV and Radio signal impact assessment was submitted, which identified the potential for minor short-term localised interference to satellite television users adjacent to the site, within 306m to the immediate north-northwest of the site. This could be mitigated by repositioned satellite dishes, to be secured by the s.106 agreement.
- 8.149 In order to ensure that the benefits of the proposed development (including those required to mitigate the harm caused) reach local residents who may be impacted indirectly or directly by the proposal's impacts, a skills, training and employment strategy (both operational and construction phases) and a contribution towards training are to be secured through the s106 agreement.
- 8.150 Emerging New London Plan policy D9 states that tall buildings, including their construction, should not interfere with aviation, navigation or telecommunication. NATS Safeguarding have requested a condition be imposed requiring the submission and implementation (once approved) of a radar mitigation scheme, to be discharged in consultation with them. This is to mitigate impact of potential reflections of radar signals from Heathrow Airport and avoid false detections being sent to air traffic controllers and forms part of the recommendation.

Conclusions

- 8.151 The proposed development would introduce a significant amount of new housing, including a mix of uses with co-living accommodation, affordable residential units and active ground floor uses linking into the Cultural Quarter. The proposed development would be well designed and deliver a key piece of public realm, making use of an existing underutilised site. There would be a good standard of accommodation for new residents, with an acceptable level of impact on neighbours. There would be harm to heritage assets, but that harm is considered to be minimised and necessary to deliver the development's benefits (and therefore is justified), and the harm caused would be outweighed by the development's public benefits. With conditions and mitigation, the proposal would be sustainable and acceptable in terms of its impact on the highway network. Residual planning impacts would be adequately mitigated by the recommended s.106 obligations and planning conditions.
- 8.152 All other relevant policies and considerations, including equalities, have been taken into account. It is recommended that planning permission is granted in line with the officer recommendation for the reasons summarised in this report.

Appendix 1: Drawing numbers

Location Plan TID_CRC_HTA-A_DR_0100, Level 00 TID_CRC_HTA-A_DR_0200 D, Level 0M TID_CRC_HTA-A_DR_0201 B, Level 01 TID_CRC_HTA-A_DR_0202 B, Level 02 TID_CRC_HTA-A_DR_0203 B, Level 03-32 – Typical Lower TID_CRC_HTA-A_DR_0204 B, Level 33-45 – Typical Upper TID_CRC_HTA-A_DR_0237 B, Intermediate Amenity TID-CRC_HTA-A_DR_0245, Level 46 TID_CRC_HTA-A_DR_0246 B, Level 47 TID_CRC_HTA-A_DR_0247 B, Roof Plan TID-CRC_HTA-A_DR_0248 A, Level 34 – General Arrangement Plan HTA-L_DR_0911, Level 34 – Planting Strategy HTA-L_DR_0912, Level 34 – Landscape Masterplan HTA-L_DR_0910, Level 48 – General Arrangement Plan HTA-L_DR_0916, Level 48 – Planting Strategy HTA-L_DR_0917, Level 48 – Landscape Masterplan HTA-L_DR_0915, Level B1 TID_CRC_HTA-A_DR_0290 B, Level B2 TID_CRC_HTA-A_DR_0291 A, General Arrangement Plan HTA-L_DR_0901 B, North Elevation TID_CRC_HTA-A_DR_0400 B, East Elevation TID-CRC_HTA-A_DR_0401 B, South Elevation TID_CRC_HTA-A_DR_0402 B, West Elevation TID_CRC_HTA-A_DR_0403 B, Levels Strategy Plan HTA-L_DR_0902 B, Planting Strategy HTA-L_DR_0903 B, Landscape Masterplan TID-CRC_HTA-L_DR_0900 B, 4239-5-3-M401, 4329-5-8-SK100, Sketch Section Through Southern Tree Pit 03.02.20, Fire Safety Statement OF-OFS-3692-01-A, Fire Submission Supplementary Part B Information 3rd February 2020, Wind Microclimate Report 0080034rep1v3 25 November 2019, Wind Microclimate Supplementary Report to 0080034rep1v4 30 January 2020, Civil Engineering Infrastructure Report 19.732-IT-01 22.01.20 + appendices, Energy Strategy – response to comments December 2019, Air Quality Assessment J3845A/1/F2 22 October 2019, Delivery and Servicing Management Plan October 2019, Desk Study/Preliminary Risk Assessment report P2169J1690/AMM Final v1.1 10 October 2019, Ecology Report 17/9/2019 V2.0, Geo-Environmental & Geo-Technical Assessment (Ground Investigation) Report P2169J1690/AMM V1.2 10th October 2019, Acoustic Design Statement DJB/7264/A 16 October 2019

Appendix 2: BRE Guidance Terms

Daylight to existing buildings

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

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

Sunlight to existing buildings

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

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

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

Daylight to new buildings: Average Daylight Factor (ADF)

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

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

Sunlight to gardens and outdoor spaces

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