

**1. DETAILS OF THE DEVELOPMENT**

Ref: 22/02663/PRE  
Location: 1-5 Lansdowne Road and Voyager House, 30-32 Wellesley Road  
Croydon, CR0 2BX  
Ward: Fairfield  
Description: To demolish the existing buildings and erect a development to provide 783 residential units (Use Class C3, as build to rent), 1,667sqm office space, internal and external amenity space, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas and works.  
Applicant: Greystar Europe Holdings Limited  
Agent: Isobel McGeever, Icen Projects  
Case Officer: Laura Field

**2. PROCEDURAL NOTE**

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

**3. EXECUTIVE SUMMARY**

- 3.1 The scheme has so far been developed through a number of pre-application meetings with officers. It was considered by the Place Review Panel (PRP) on 19<sup>th</sup> January 2023 and their views are covered in section 5.
- 3.2 Discussions so far have focused on the principle of the development, the scale/height/massing, the design approach, impact on the streetscape and heritage assets (including the Almshouses), impact on the skyline from longer range views, landscaping and public realm, impacts on neighbouring buildings (in terms of light/outlook/privacy etc.) and transportation matters. Discussions are ongoing in relation

to these matters and with regards to affordable housing provision, and technical matters such as microclimate issues, Due to its height the proposed development is referable to the Greater London Authority (GLA). The applicants have had pre-application discussions with officers of the GLA on the 28<sup>th</sup> October 2022 (with the LBC case officer in attendance). The second meeting has taken place on 22<sup>nd</sup> March 2023. Officers are awaiting the formal response from the GLA

3.3 It is anticipated that a single full planning application will be submitted to cover the whole site.

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

- The application site (generally level and 0.475 ha in site area) is situated at the junction of Wellesley Road and Lansdowne Road. It is approximately 300 metres from East Croydon Rail Station, 370 metres from West Croydon Rail Station and 60 metres to the east of the edge of Croydon Primary Shopping Area.
- The site is currently occupied by a hostel, a hotel and a fitness centre, café, and offices. There is a basement area which serves as a car parking and refuse area. The existing buildings on the site vary in height from 4-11 storeys. The site also includes Voyager House, which is a six-storey building fronting onto Wellesley Road. This is a vacant office building.
- Adjacent to the site and to the east, is Emerald House (12 storeys) which has been converted from office to a residential use (following on from a previous office to residential prior approval permission in 2014).
- To the west of the site lies Wellesley Road, a dual carriageway following a north/south alignment which is a major artery through Central Croydon for public transport (buses, trams) but also for private motor vehicles. On the opposite side of Wellesley Road is the shopping core of Croydon, focused around the Whitgift and Centrale Shopping Centres.
- To the south of the site is the Jury's Inn Hotel and beyond this are a number of office buildings of varying heights with retail uses fronting onto Wellesley Road at ground floor level. Beyond this is Croydon College, one of the main education providers within the Town Centre.
- To the north are various office buildings including the Home Office at Apollo House, which is a 22-storey building and Canterbury House which is an 11-storey building which has been converted into residential units following a previous office to residential prior approval permission in 2014. To the north of these office blocks is Saffron Square which comprises buildings of varying heights, including a 44-storey tower.
- To the east of the site are various office and multi-storey car parking uses. East Croydon Rail Station lies to the south east of the site and a pedestrian bridge across the tracks/platforms, linking the station directly to Lansdowne Road. Adjacent to the station are a number of sites being bought forward for development for residential and office purposes. Further to the east the character of the area changes to low rise Victorian housing.



Figure 1: Site location plan

#### Location

1. Llanedowne building
  2. Juy's Inn Hotel
  3. Emerald House
  4. Marco Polo House
  5. YMCA
  6. Canterbury House
  7. Apollo House
  8. Voyager House
  9. Fairfield Hotel
- Site Extents

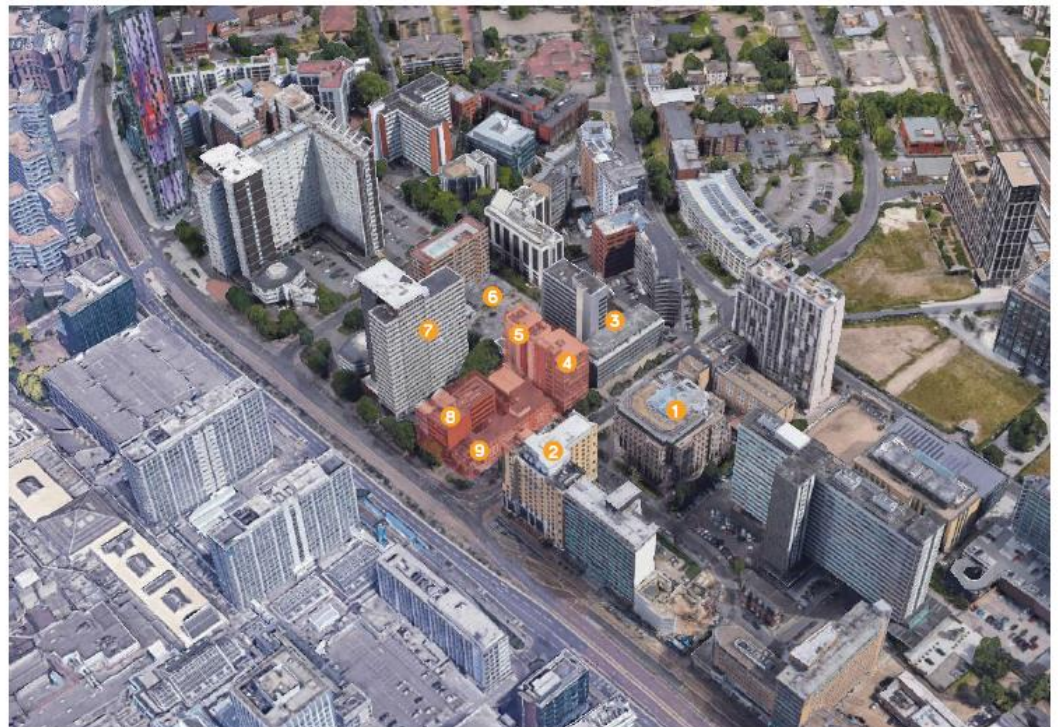


Figure 2: Site location in red

#### Designations

- The site is located within the Croydon Opportunity Area (COA).
- The site lies within in an area identified as suitable for tall buildings in the Croydon Local Plan 2018 and the Croydon Opportunity Area Planning Framework (OAPF) and an office retention area.

- The site is also within Croydon Metropolitan Centre, at a distance of some 60 metres from the Primary Shopping Area defined in the Croydon Local Plan Policies Map. It also lies with the Place Specific Area- Policy DM38: Croydon Opportunity Area.
- The site has excellent Public Transport Accessibility (PTAL 6B), being in close proximity to East and West Croydon Stations and numerous bus and tram links.
- A Tree Preservation Order covers 4 trees on the Lansdowne Road frontage, (TPO No. 4, 1999).
- The site in totality, is an area at risk of surface water flooding, a critical drainage area and is at risk of ground water flooding.
- All the roads around the site are within the Central Croydon Controlled Parking Zone.
- The application site is not located within a designated conservation area, nor is the building statutorily listed. However, there are several heritage assets within Croydon Town Centre including adjacent conservation areas and listed buildings, most notably the Wellesley Road (North) Conservation Area, Central Croydon Conservation Area, Church Street Conservation Area, the Grade II listed Electric House, Grade I listed Hospital of the Holy Trinity Almshouses, Grade I listed Parish Church of St Michael and all Angels, Grade I listed Parish Church of St John the Baptist (Croydon Minster) and locally listed Corinthian House. Number One Croydon is a locally listed building and a landmark building.
- The site itself lies within the site allocation 142 of the Croydon Local Plan 2018. However, this allocation does not include Voyager House.

**142: 1 Lansdowne Road**

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Croydon Opportunity Area	CR0 2BX	0.47ha	Lansdowne Hotel, YMCA Hostel and Marco Polo House	Central	High	Large buildings with surrounding space; Large buildings with well defined building line and adjacent to other buildings; Linear Infrastructure	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Mixed use development comprising residential, with offices, leisure and/or hotel		Residential development will help to meet the need for new homes in the borough. Site lies within Croydon Metropolitan Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail for which sequential testing would be required, are acceptable in this location.			2021 - 2026	The Site (excluding Voyager House) has an implemented, deliverable planning permission. The developer remains in discussions with the Council with regard to a revised scheme incorporating Voyager House.	419 to 441

Figure 3: Extract from the Croydon Local Plan 2018- site allocation

The Regulation 19 partial Local Plan review (which is currently paused and therefore has very limited weight) included this site (which was expanded from the Croydon Local Plan 2018 allocation to include Voyager House). Details as below:

Site 142: 1 Lansdowne Road						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character
Croydon Opportunity Area	CR0 2BX	0.48ha	Voyager House, Lansdowne Hotel, former YMCA Hostel and Marco Polo House	Central	High	Large buildings with surrounding space, Large buildings with well-defined building line and adjacent to other buildings, Linear Infrastructure
Description of option	Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development comprising residential, with offices, leisure and/or hotel	Residential development will help to meet the need for new homes in the borough. Site lies within Croydon Town Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail for which sequential testing would be required, are acceptable in this location.			2021-2027 - 2032	The Site (excluding Voyager House) has an implemented, deliverable planning permission. The developer remains in discussions with the Council with regard to a revised scheme incorporating Voyager House. Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	794 419 to 444

Figure 4: Extract from the Local Plan Review- site allocation

- There are other allocations on the surrounding sites. The key site allocations in relation to this development are as follows and are shown in the image below:

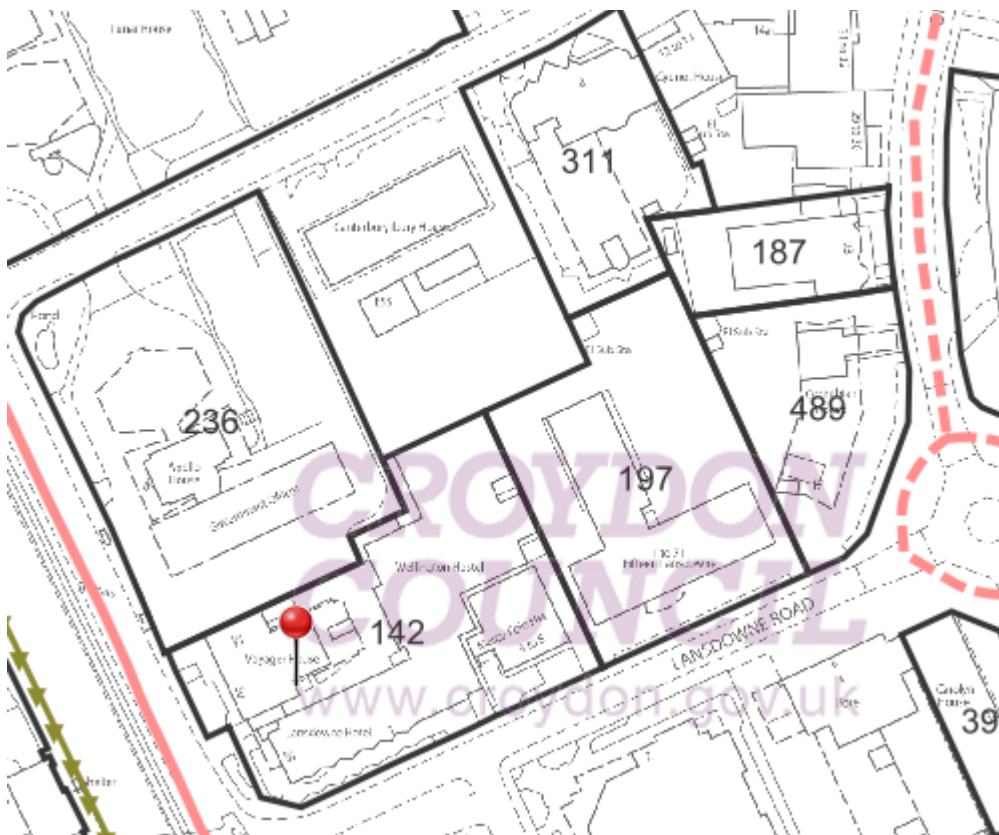


Figure 5: Local Plan Map- site allocations

197: Emerald House, 7-15 Lansdowne Road

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Croydon Opportunity Area	CR0 2BX	0.39ha	Office building	Central	High	large buildings with surrounding space; Large buildings with well defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Office and residential and/or hotel (with healthcare facility if required by the NHS)		In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place.			Post 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	55 to 157

218: Lunar House, Wellesley Road

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Croydon Opportunity Area	CR0 9YD	1.34ha	Office Block	Central	High	large buildings with surrounding space; Linear Infrastructure	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Office and residential and/or hotel (with healthcare facility if required by the NHS) if the site is no longer required by the Home Office.		In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. Conversion should be considered in the redevelopment to increase sustainability of the site.			Post 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	188 to 542

236: Apollo House, Wellesley Road

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Croydon Opportunity Area	CR0 9YA	0.58ha	Office Building	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Offices and residential and/or hotel (with healthcare facility if required by the NHS) if the site is no longer required by the Home Office. There is one record of sewer flooding.		In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. To assist sustainability the development must incorporate acoustic measures to reduce noise impact on the development.			Post 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	82 to 234

311: Mott Macdonald House, 8 Sydenham Road

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area
Croydon Opportunity Area	CR0 2EE	0.24ha	Office building	Central	High	large buildings with surrounding space; Large buildings with well defined building line and adjacent to other buildings
Description of option	Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Offices and residential and/or hotel (with healthcare facility if required by the NHS)	In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon Station but outside of the Primary Shopping Area. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. A community use could assist the sustainability of the site.			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	34 to 97

## Relevant Planning History

11/02986/P	Granted	On 28th March 2012, planning permission was granted for the Demolition of existing buildings and erection of a part 12, part 16, part 55 storey building, comprising residential (Use Class C3), office (Use Class B1), café/restaurant (Use Class A3), leisure (Use Class D2) and hotel (Use Class C1), with associated parking, landscaping and access. A material start on site has commenced (albeit on a limited basis).
17/03457/FUL	Granted	On 2nd October 2017, planning permission was granted for the Demolition of the existing buildings and the erection of a part 11, part 41, part 68 storey development comprising 794 residential units (Use Class C3), 35,000 sq.m (GIA) of offices (Use Class B1a), retailing/restaurant/bar uses (Class A1/A3/A4 and/or A5), public viewing gallery, swimming pool and gym (Use Class D2), with associated access and servicing, car/cycle parking, landscaped pedestrian walkways and public plaza. A material start on site has commenced (albeit on a limited basis).

As there has been a material start with both of the previous planning permissions, these are both considered to be commenced and either could be fully implemented at any time.

22/05177/ENV	Not required	<p>Environmental Impact Assessment (EIA) Screening Opinion Request for the demolition for the existing buildings and construction of new buildings to the maximum height of 230mAOD and up to 50-storeys, based on 3150mm floor to floor across the typical residential levels and taller heights for the lower and top levels/roof. Proposed Development will provide:</p> <p>Up to 825no. residential units</p> <p>Up to 6,500 sqm (GIA) of commercial floorspace, including office and retail floorspace, both of which now fall under Use Class E. This will be located on the lower floors, with an active ground floor promoting commercial operations including retail, café and restaurant uses</p> <p>Up to 30no. car parking spaces for blue badge users</p> <p>Up to 1,600 cycle parking spaces with an additional 50 space at ground level for short stay provision; and</p> <p>Associated access and servicing, car / cycle parking, and landscaped pedestrian walkways</p>
--------------	--------------	--

Surrounding Area

The surrounding area contains a wide variety of building types and scale, within the central cluster a number of tall buildings are either under construction or benefit from planning permission. Those either under construction or with planning permission range in height up to 49 storey (College Tower). Ten Degrees (101 George Street -Former Essex House) is a completed Build to Rent Scheme which is a part 38 and part 44 storey building. At 96 and 98 George planning has been granted for an 11 storey building for office and café uses.

Two sites directly adjoin the site as below:

Canterbury House:

22/03745/FUL	Decision pending	<p>Construction of a 13-storey rear extension and 2-storey roof extension to provide 97 residential units (Class C3), a new pocket park, provision of cycle and bin stores together with internal and external alterations to the existing building at Canterbury House which has been converted into residential from office use. This site lies immediately to the north.</p>
--------------	------------------	---

Emerald House:

14/01605/GPDO	Approve	<p>Conversion to form 70 one bedroom and 51 two bedroom flats. This has been implemented.</p>
---------------	---------	---

16/04025/P	Granted	<p>Construction of roof extension to lower block to form 8 additional flats. This has been implemented.</p>
------------	---------	---

**Proposal**

4.1 The proposal has been amended during the course of on-going discussions. The current proposal is for the following:



- Demolition of the existing buildings.
- Erection of two buildings, Building A would be 47 storeys, fronting on to Wellesley Road and Building B would be 32 storeys, fronting on to Lansdowne Road.
- Provision of 783 flats, to be Build to Rent.
- Office space at 1,667sqm.
- 6 disabled persons' car parking spaces, accessed from Lansdowne Road.
- Provisions of 1,312 cycle parking spaces.
- Communal outdoor amenity space within the public realm and rooftops.
- Indoor communal space.
- Cycle and refuse storage within the buildings with cycle storage also in basement areas.

4.2 The current proposed unit mix comprises:

<b>Occupancy</b>	<b>Units</b>	<b>% Mix</b>
Studio- One bedroom 1 person	63	8
One bedroom 2 persons	390	48
Two bedroom 4 persons	254	34
Three bedroom 3 bedroom 5 person	76	10

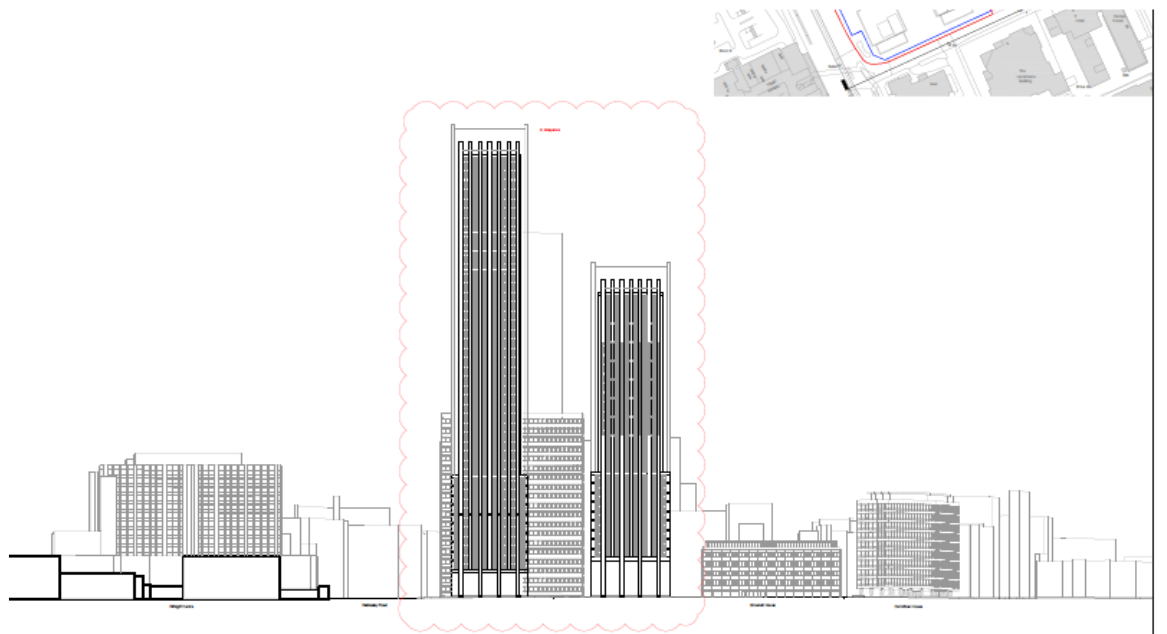


Figure 6: Current drawing, Lansdowne Road

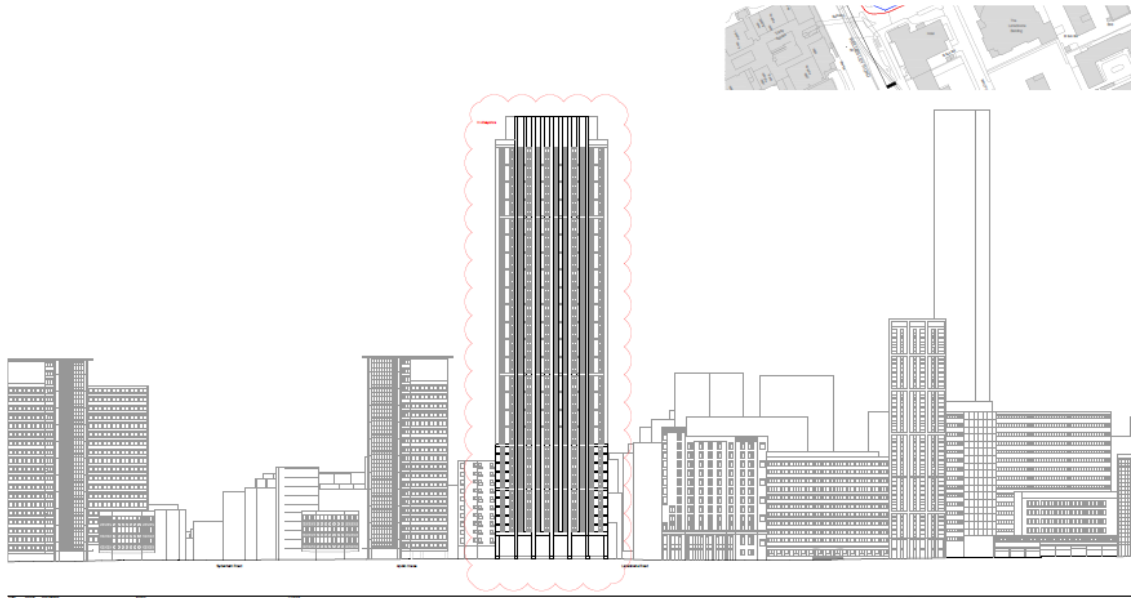


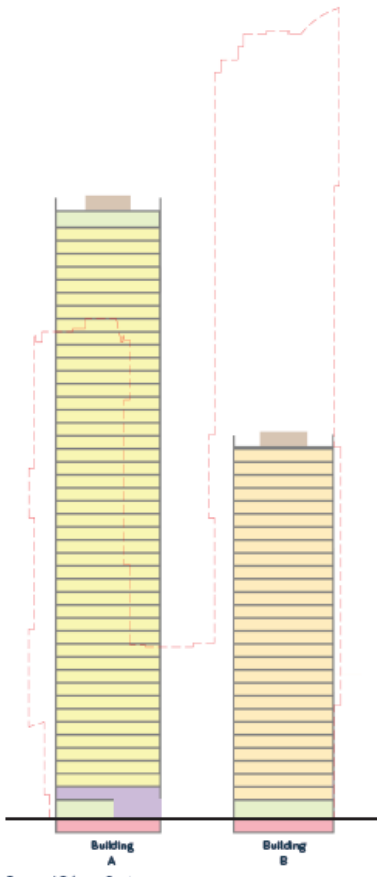
Figure 7: Current drawing from Wellesley Road



Figure 8: Current visual from Wellesley Road

## 5. PLACE REVIEW PANEL FEEDBACK

- 5.1 An earlier iteration of the scheme was presented to the Council's Place Review Panel on 19<sup>th</sup> January 2023, see images and plans below. Note that the scheme is planned to be taken back for a second PRP review in April 2023.



Proposed Scheme Section





Figure 9: Proposal images presented to PRP

## 5.2 General Comments

- The Panel noted the significance of this central Croydon site and the opportunity this brought in terms of setting a positive example for future development.
- The Panel acknowledged the amount of uncertainty associated with the site in relation to the Whitgift Centre and the lack of a masterplan.
- The Panel observed that while there was previous consent for the site, it was important to ensure that this scheme is as well designed as possible rather than on comparing it to the extant consent and that this project is a new planning application which will be judged on its own merits

## 5.3 Landscape, Public Realm, and Amenity

- The Panel encouraged the Applicant to focus more on the experience of moving past the site in the east-west direction, as this would be busier than the north-south route due to people travelling to and from East Croydon Station. It was felt that the north-south route was driving decisions in a lopsided way. However, it was also noted that it was very positive for this route that proposals for this site and Canterbury House were being developed concurrently.
- The Panel was concerned about the loading bays on Lansdowne Road due to the expected amount of pedestrian movement along this route and whether the bays combined with the new building line may obstruct this.
- The Panel expressed concern regarding the risk of the space to the rear of the site being a 'left over' area with safety risks, particularly if there is less pedestrian movement in the north-south direction. The Applicant was therefore advised to carefully consider the design of this space. It was also observed that improvements to this area would be particularly beneficial to the adjacent affordable tower.
- While the efforts to produce a 'human scale' street frontage were welcomed, the Panel encouraged the Applicant to consider the street-level experience more three-dimensionally and to treat this experience more generously, for example, by stepping back the footprint of the building.

- The Panel noted that the space between the buildings would benefit from more generosity, particularly if rooftop amenity becomes unviable, which would put additional pressure on this space. The Applicant was advised to adequately consider the microclimate of this space in order to ensure that it does not feel cold and dark.
- While the Applicant expressed that they did not believe this space should feel like a playground, this was challenged by the Panel, who suggested that this space being busy at certain times of day with children was not necessarily a bad thing. More broadly, the Applicant was encouraged to consider how different groups might feel identity and ownership in relation to the space and the different areas within it at different times of the day. For example, the Applicant might consider how certain areas are quieter, noisier, dedicated to play, or covered to protect from cold or wet weather.
- The Panel encouraged the Applicant to retain the existing trees and, if not possible, ensure that new mature trees replace them.
- The Panel advised the Applicant to carefully consider the experience of the public realm around the back-of-house areas which might be impacted by bins and servicing, particularly as pedestrians approaching from the east may use the servicing route as a shortcut. For example, planting could be used to soften blank frontages.

#### 5.4 Massing

- While the building heights were considered acceptable by the Panel, concerns were raised regarding the massing of the towers. The floorplan, with 12 units per core, was considered to result in an overly chunky building. The subsequent distance of 22m between the two towers was also considered insufficient and overly constrained, both in terms of the outlook of dwellings and the quality of the public realm.
- The Panel raised concerns about how close the total mass of the tower was to the pavement and therefore to buildings across the road. The Panel noted that a revised massing and building line could also provide more space for people to sit out in the sun with seating along Lansdowne Road.
- The Panel suggested that the massing could be altered to improve microclimatic and wind-related conditions by introducing a podium which could provide space for additional external amenity and reduce the tall tower effect directly along the pavement.

#### 5.5 Architectural Expression

- The Panel responded to the façade studies by advising the Applicant to ensure the scheme avoided fussiness and focused on simplicity on upper floors due to the scale and height of the scheme.
- The Panel advised that the Applicant ensure adequate design focus was applied to Building B as, although less prominent than Building A, it would still be a significant structure.
- The Applicant was advised to look at external movable sun shading, rather than overly small window openings when trying to reconcile heating and daylight/sunlight.

#### 5.6 Internal Layout and Unit Quality

- The Panel advised the Applicant to ensure that Building B received adequate attention that would ensure that features such as balconies are effectively considered. The Panel suggested exploring features that would enhance this building, such as: winter gardens, additional amenity and community spaces for young residents, and the inclusivity of shared spaces.
- The Panel noted that bicycle parking needs to be easily accessed if it is to be well-used and encouraged the Applicant to explore making the route to cycle parking

more straightforward by, for example, providing access to the lift from the exterior of the buildings.

- The Panel stressed that north-facing units, particularly studios, are not acceptable. Concerns were raised regarding the short distance between north-facing units in the BTR building and Apollo House. The Applicant was advised to reduce the number of units per core in order to rectify this and respond to other concerns around massing. The Panel suggested that switching some 1- or 2-bed units into 3-bed units could help produce a better designed layout and scheme. The Applicant was also advised that these alterations to the plan should seek to bring natural daylight into the core of the building.

#### 5.7 Heritage

- The Panel requested that the Applicant supply rendered views from the Whitgift Almshouses and Croydon Minster to understand the impact of the scheme on these designated heritage assets. The scheme was considered to cause less than substantial harm to the significance of the Whitgift Almshouses and therefore would be expected to outweigh this harm with public benefits.
- The Applicant was advised to consult Historic England's GPA 3 guidance (The Setting of Heritage Assets). The Panel emphasised the experience of the significance of assets in addition to the direct visual impact upon them.
  - The Applicant was encouraged to consider the impact of the scheme on Apollo House and Lunar House, as well as the relationship between the scheme and the original design intent of these 'gateway' structures. The Panel referred them to paragraph 203 of the NPPF in relation to the impact on these non-designated assets.

#### 5.8 Affordable Housing

- The Panel was concerned with how, despite the proximity of the two towers, there was a risk of separation between them – for example, whether facilities in the BTR tower could be used by affordable housing residents. The Panel recommended the Applicant find ways to create overlap between these two communities. The Applicant was encouraged to consider how to establish a link between the two buildings, for example, by ensuring the ground floor of the buildings and the public realm works for as wide a range of people as possible.

#### 5.9 Public Engagement

- The Panel suggested that, due to the significance of the site and building, the Applicant could give more concerted attention to the engagement process and go beyond exhibitions and surveys.

#### 5.10 Summary

- The Panel are supportive of much of the scheme's strategy; however, there were several significant concerns regarding the bulk and proximity of the towers, the outlook and aspect of residential units, the quality of the pedestrian experience of the public realm and its microclimate, and the risk of an 'us and them' relationship between the two proposed towers. In summary, the Panel strongly recommends the Applicant to:
  - improve the experience of moving in the east-west direction across the site and ensure that the design and safety of the public realm to the rear of the site is adequately considered;
  - approach the public space by Lansdowne Road with more generosity and ensure it works for wide range of users;
  - refine the scheme to mitigate any potential adverse microclimatic effects on the wider public realm, particularly in terms of wind;

- reduce the bulk of the towers and improve the outlook of residential units by reducing the number of units per core;
- ensure the architectural approach considers the scale and height of the scheme and manages overheating/daylight without excessively reducing window sizes;
- ensure the affordable tower's design receives as much attention as the BTR tower;
- ensure access to bicycle parking is as straightforward as possible;
- avoid proposing any single-aspect units, especially north facing ones adjacent to Apollo House;
- introduce daylight into the building cores;
- consider the impact of the scheme on designated and non-designated heritage assets;
- find ways to create overlap between the communities within each tower; and,
- approach public engagement creatively and proactively.

5.11 Subsequent to the feedback from PRP, the following amendments have been made:

- The service bay layout and site access has been amended, giving greater depth to footways at key points on Lansdowne Road for building entrances and allowing better connection to Wellesley Road. Continuing to work with officers on the public realm and playspace details.
- Ground floor layouts have been revised to improve active frontages.
- Initial feedback has been returned on daylight/sunlight, overheating and wind impacts. The internal layouts and overall massing have been revised to respond directly to these findings.
- Internal floor layouts have been revised to remove single-aspect North-facing apartments.
- Greystar have taken on ownership and operation of both buildings, creating a fully Build to Rent development with pepper-potted Discount Market Rent housing throughout. This creates two equally owned and operated buildings.
- The resident amenity strategy has been revised to be consistent across all apartments, and between both buildings, with 50% private amenity requirement internalised within apartments and remainder delivered through various amenity spaces within the building.
- The massing of East/West facades has been broken down through steps in those facades and further development has taken place in regard to the appearance of the two buildings.

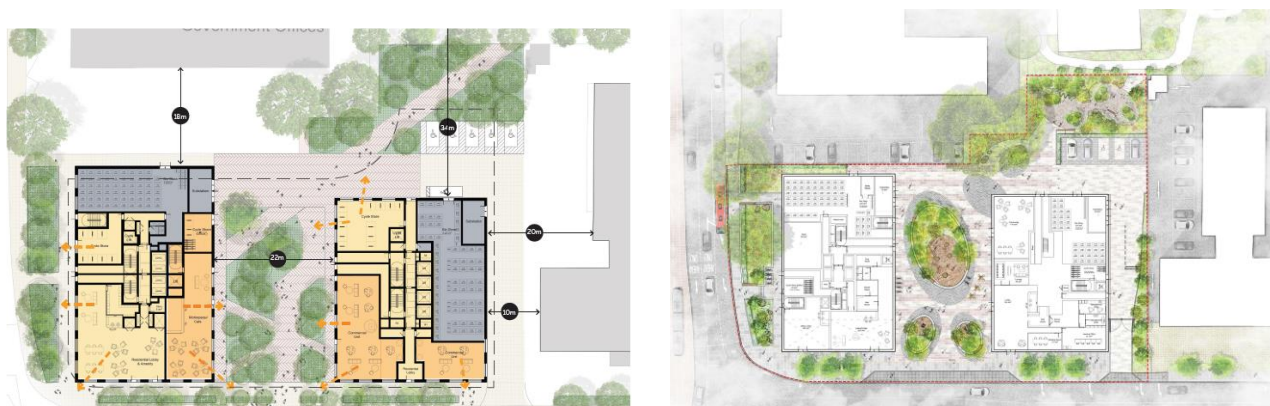


Figure 10 and 11: PRP scheme (l) and current scheme iteration (r)



Figure 12 and 13: PRP scheme (l) and current scheme iteration (r)

## 6 SUMMARY OF MATTERS FOR CONSIDERATION

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

- Principle of Development
- Design, Townscape and Heritage
- Impact on Adjoining Occupiers Living Conditions
- Mix and Quality of Accommodation Provided
- Highways
- Environment
- Other matters
- Mitigation

### **Principle of Development**

#### Extant Planning Permissions

6.2 As stated in the relevant planning history section above, the site benefits from two extant planning permissions. The most recent is 17/03457/FUL (hereafter referred to as the “2017 permission”). This includes permission for:

- Demolition of the existing buildings
- erection of a part 11, part 41, part 68 storey development
- 794 residential units (Use Class C3)
- 35,000 sq.m (GIA) of offices (Use Class B1a)
- Retailing/restaurant/bar uses (Class A1/A3/A4 and/or A5)

6.3 Various images of the 2017 permission are below.



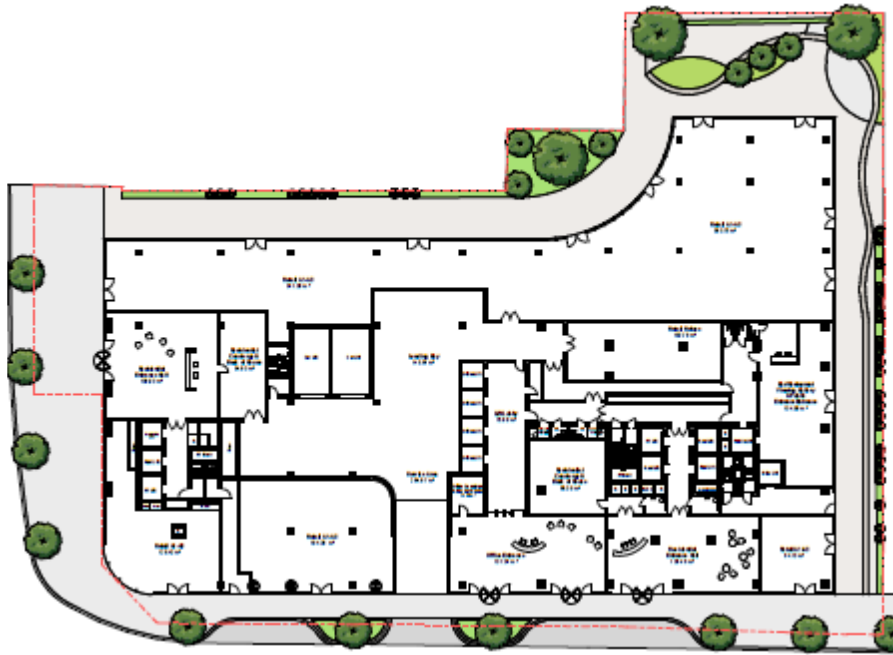


Figure 14: Site layout/ground floor plan of 2017 permission



Figures 15 and 16: South Elevation of 2017 permission

6.4 As a material start on site has been undertaken, this 2017 permission is extant. Therefore, this is a material consideration with regards this pre application and the determination of any planning application in the future.

Loss of Hotel and associated facilities

6.5 There is no policy that would seek to protect existing hotel and leisure uses within the Croydon Metropolitan Centre. As Members may be aware, parts of the hotel are being used to provide temporary accommodation by the Council's Housing team. This is on the

premise that the site would soon make way for redevelopment on the site, which includes the delivery of a significant number of homes.

#### Loss of Hostel

- 6.6 The principle of residential use on this site is fully supported by policy at the national, regional and local level and is in accordance with the objectives of the London Plan, Croydon OAPF and the site allocation within the Croydon Local Plan 2018. The loss of the YMCA hostel has been accepted on the previously approved 2011 and 2017 planning permissions. The applicant has prepared a “Review of Loss of Hostel” note which provides background to the hostel. The hostel is now vacant, and its accommodation has long been re- provided elsewhere in the town centre. The former hostel has been used for short stay temporary housing accommodation, but this ceased in December 2022.
- 6.7 As background for Members, the capital receipt of the YMCA hostel was used to replace existing buildings with new modern facilities within Croydon, which was part of the YMCA’s Asset Management Strategy. This aimed to achieve a higher quality of provision, and to transform its buildings for the homeless and specialist services for young people, women and children. Within this area there is the new Alexandra House (on Dingwall Road).
- 6.8 Therefore, whilst the hostel has been used for temporary accommodation until recently, the YMCA hostel was re-provided some time ago. The proposed use of the site should also be weighed against the regeneration benefits it provides, including jobs and housing, the site allocation and the extant 2017 planning permission. The scheme would deliver 781 (circa) new homes and the loss of the existing hostel can be supported by officers.

#### Office Space, Economy and Employment

- 6.9 The site lies within the Office Retention Area. London Plan Policy E1 (offices) states that increases in the current office stock should be supported in specific locations in London, which include “the strategic outer London office location at Croydon town centre”, where the office market should be consolidated and – where viable – extended. The site is located within the Croydon Opportunity Area identified in the London Plan which is identified for the potential for 14,500 new homes and 10,500 new jobs by 2041. The area is part of the Trams Triangle/London-Gatwick-Brighton mainline Growth Corridor.
- 6.10 The Croydon Local Plan (2018) Policy SP3.13 states that:  
The Council will promote and support the development of new and refurbished office floor space in Croydon Metropolitan Centre, particularly around East Croydon Station and within New Town, and the District Centres as follows:
- a. Up to 92,000m<sup>2</sup> by 2031 to be located in Croydon Metropolitan Centre;
  - b. Retaining, or through refurbishment providing, higher quality office floorspace (Grade A), or lower quality floor space for which there remains a demand, within the Office Retention Area of the Croydon Metropolitan Centre. Mixed use developments must include a level of office floor space proportionate to Croydon’s role as an Outer London Office Centre; and
  - c. Up to 7,000m<sup>2</sup> to be spread across the borough’s District Centres.
- 6.11 The latest Croydon Employment Land Review was produced in November 2020 and therefore represents the latest published evidence relating to Croydon’s office market. This suggests a need for 30,500 – 33,500 sqm, around 23,000 of which should be accommodated in Croydon Metropolitan Centre, up to 2039.
- 6.12 It is acknowledged the intent to redevelop the site has been considered acceptable under both the site allocation and extant planning permission. However, the extant permission proposed significantly more office floorspace than the current proposals, and as indicated

above, the site is within an Office Retention Area where development is expected to consolidate and increase office floorspace. The applicant has submitted a study on office demand in Croydon, which is welcomed as evidence to support the quantum of office space currently proposed.

- 6.13 Currently, office space is provided within Marco Polo House which is let to a serviced office operator and Voyager House which is currently vacant. Together, this amounts to approximately 6,000 square metres of office floorspace.
- 6.14 The scheme is currently proposing to provide 1,667sqm of office floorspace within Tower B. This will be a separate office use to the co-working spaces within the Build to Rent housing element of the scheme.
- 6.15 Therefore, the proposed development would result in an overall loss of office floorspace. The applicant's Office Needs Assessment concludes that, overall, office market demand in Croydon is subdued. The office market analysis presented in applicants report suggests that there is limited demand for office floorspace in Croydon. It also noted recent market signals indicating a move away from large-scale offices towards smaller scale and potentially higher quality footprints and a greater use of flexible workspaces. It forecasts that speculative large-scale offices are expected to experience weaker demand as corporates change their accommodation strategies. This report has been assessed and the conclusions drawn recognised as acceptable to support the proposed development.
- 6.16 The applicants have been working with the Council's Economic Development, Inward Investment Team on the type of office provision this site could provide. These discussions are ongoing. This can help inform the uses that will be able to be provided as part of the development. In terms of general economic benefits and employment, the scheme is a Build to Rent model which also generates employment such as general managers, concierge staff etc. Employment and training contributions and obligations (construction/operational) would be secure through a legal agreement. The regeneration benefits also must be weighed in the planning balance.

#### Residential Development

- 6.17 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year. The current housing target is therefore 2,079 homes per annum up to 2029.
- 6.18 Under Policy H11 of the London Plan 2021 it states that for proposals to qualify as 'build to rent' the following criteria must be met:
- 1) the development, or block or phase within the development, has at least 50 units
  - 2) the homes are held as Build to Rent under a covenant for at least 15 years
  - 3) a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
  - 4) all the units are self-contained and let separately
  - 5) there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
  - 6) longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
  - 7) the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked

- 8) there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence
- 9) providers have a complaints procedure in place and are a member of a recognised ombudsman scheme
- 10) providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

6.19 Throughout the course of the pre-application discussions the applicant has advised Officers that the proposal would fall within the above criteria and is capable of providing accommodation within Use Class C3.

### Conclusion

6.20 In addition to the above, a balanced approach much be adopted as to developing land for more efficient housing and office use whilst protecting character/heritage/neighbouring amenity etc. Taking in account the extant consents and the site allocation, the principle of the loss of the hotel, associated facilities, hostel and existing office space, provision of circa of 783 homes and new office space of 1,667sqm, with associated facilities can be supported.

### **Design, Townscape and Heritage**

#### General

- 6.21 London Plan Policy D9 states that based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Full impact must be considered. Croydon Local Plan 2018 states that a tall building is a building that is 6-storeys high (25 metres) or which is significantly taller than its surrounding buildings.
- 6.22 The development plan contains a plan-led approach to guiding the location of new tall buildings, which in the case of Croydon would be within the Opportunity Area Planning Framework (OAPF). The site lies within in the Central Area identified as suitable for tall buildings in the Croydon Local Plan Strategic Policies and the OAPF. Policy DM38.3 of the Local Plan states that within the Central Area, tall buildings will be considered on their own merits, including a detailed assessment of building form, treatment, urban design and height along with an assessment of the impact on views, heritage assets, shading and environmental impacts. Building A would be 47 storeys and Building B would be 32 storeys Officers are of the opinion that the tall buildings are be supported given the sites OAPF location, relationship to heritage assets and proximity to the central cluster of tall buildings and the extant 2017 permission. Officers would welcome comments from Members on this matter.

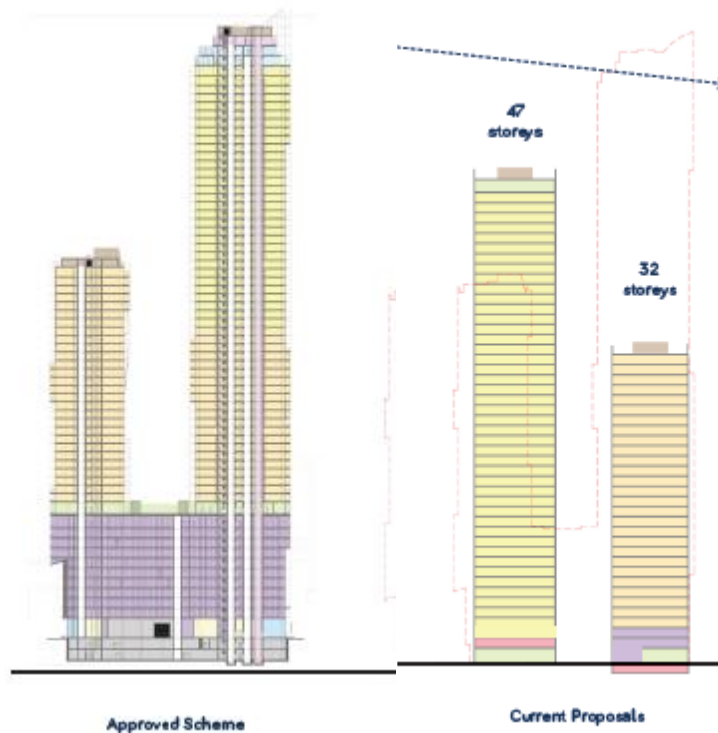


Figure 17: Heights of extant 2017 permission (l) and current proposal (r)

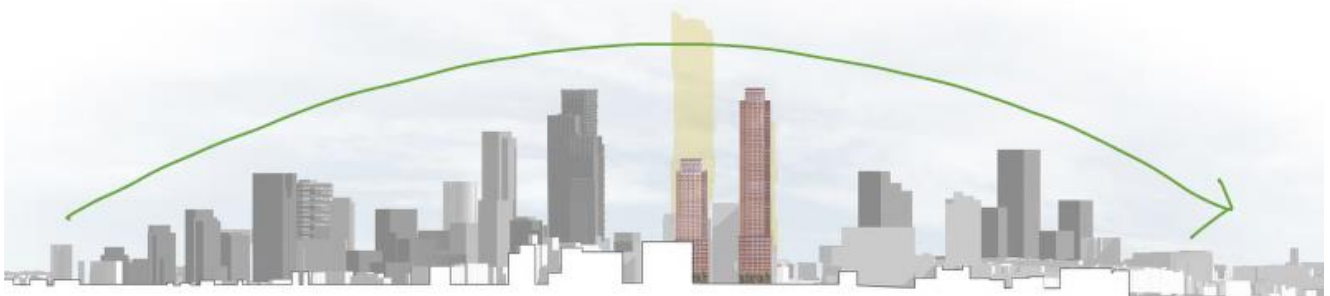


Image 18: Current proposals within the Croydon skyline (extant 2017 permission in shadow)

## Massing

- 6.23 Whilst the building would be visible from several viewpoints officers are of the opinion that two towers are generally acceptable subject to further design development. Officers are comfortable with the height given the location and the extant 2017 permission. This is subject to microclimate and amenity provision concerns linked to site capacity being resolved. The NPPF and London Plan encourages the best use of urban land in well-connected locations; the site benefits from excellent public transport links and government policy would support the optimisation of this site.
- 6.24 Tower 'A' stands at 47 storeys, while Tower B stands at 36. There remain officer concerns over the quantum and massing, predominantly due to the unresolved microclimate issues, pressured public realm, and underprovision of play and private amenity provision.

6.25 Furthermore, there remain concerns over the building's lack of slenderness. Both towers appear broad, which is reflected through various views impacting the townscape. Tall buildings must be designed as slender and elegant with applicants expected to demonstrate that the development successfully achieves a slender form, and how it contributes positively to the streetscape and skyline. Furthermore, it is important that new buildings do not create, or contribute, to overbearing tall development.

6.26 The overall massing has seen ongoing development which has amended the towers to include shoulder design elements and removal of balconies. Officers have been working with the applicants including several design workshops. However, officers still have concerns over the massing and articulation of Tower A from Wellesley Road, how the base is aligned and works together as coherent pieces of townscape and architecture. Massing concerns are shared by the GLA and PRP on a previous iteration of the scheme. However, it is also important to note the extant 2017 permission has similar proportions on the Wellesley Road façade.



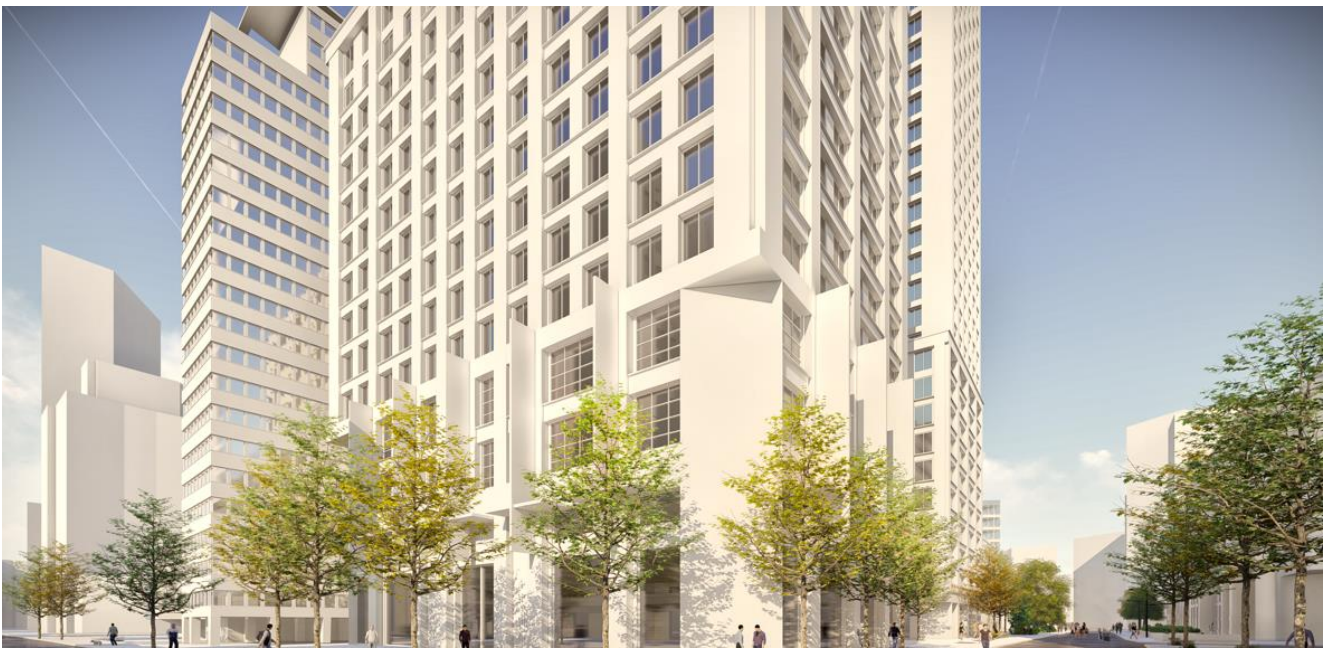
*Figure 19 and 20: Massing diagrams*



*Figure 21: Key View along Wellesley Road*



*Figure 22: Wellesley Road façade*



*Figure 23: Corner of Wellesley Road and Lansdowne Road*

6.27 The broadness of the massing, and its grounding directly to the public realm, in conjunction with the height, contributes towards detrimental environmental (wind) impact at the public realm level, pockets parks and along the street, Furthermore, the recent data for the general massing posed climatic disturbance, not only within the immediate vicinity of the site but also through wider areas several roads away from the site.

6.28 Further development on the massing, architecture and façade detailing is required in response to mitigate the concerns over the microclimate and sunlight analysis. Tall, large and high-density developments should positively respond to their surrounding environment, with no change to the wind comfort category of all surrounding public realms and carriageways, particularly the experience of pedestrians and cyclists; There is particular concern along Lansdowne Road, given the importance of the east-west route



from East Croydon station. Officers expect schemes to respond to microclimate concerns through massing in the first instance, and wind comfort standards for public spaces for dwelling should be suitable for sitting for long periods in all areas. At this stage, the applicants have provided officers with an indicative range of design solutions to microclimate and massing, however these are primarily architectural design features such as low-level canopies and facade fin extrusions over the public realm. These solutions will need to be evidenced in detail and explored in further officer workshops to test if they sufficiently resolve all of the issues. The data evidence should exceed the microclimatic safety standards and meet policy.

6.29 Tower 'A' is currently broader than 'B', which is grounded directly at the corner of Lansdowne Road and reduces the public realm provision. Whilst the corner of the building has had a chamfer to the corner within the latest iteration in response to microclimate mitigation; the main building line on Lansdowne Road protrudes beyond the existing building line, and primarily beyond the street line. Lansdowne Road is intended to become the primary walking route into the Town Centre from the station, particularly if Network Rails proposed changes to East Croydon Station are implemented. The scheme should be adaptive to support the National Rail's plans and the Council's Strategic Regeneration Framework document. Furthermore, a new surface crossing is intended by the Council in this vicinity which would create additional pressure of pedestrians waiting to cross in this location. Finally, the proposal itself is set to increase footfall burden in local areas and provide an uplift to the east-west route. In view of all these aspects, the perimeter treatment and footprint along with the public realm provision requires a critical review and further mitigation in addressing these concerns should be evidenced.

6.30 Overall the massing form is replicated across both towers, which still requires further development on mitigating the coalescence of both towers and giving each its own distinguishable identity as significant tall buildings in the town centre, as mentioned above. The applicants have sought to break down the rectilinear forms through shoulder elements within a crown form and corner recesses starting midway at different levels. The current iteration develops a three storey chamfer to perimeter edges at the base in response to wind deflection; whilst this massing mechanism does aid the openness at the public realm, the podium massing now cantilevers awkwardly over the public realm creating an unresolved 'pinch' through the verticality and proportions of the building; ultimately emphasising the over bearing on Wellesley road. Whilst the mechanisms introduced by the applicant achieve a modest visual reduction in massing, further work is required to mitigate the above-mentioned concerns over the massing strategy.

#### Active frontages

6.31 The ground floor layout has been discussed through the pre applications. Officers are pleased to see active frontages facing Lansdowne Road and Wellesley Road in addition to the rear of the site. Further information has now been received that indicate multiple communal uses on the ground floor that would align with a build to rent scheme, similar to the provision offered by 'Ten Degrees' and the entrance lobby to the office space to the rear of the site which would provide activity within the public realm linking to the route to the play space and Canterbury House.

6.32 There would be a gap of 23 metres between the towers allowing for public realm while the two buildings would be linked by the Build to Rent model allowing for better management of the two buildings and shared amenities. Incorporating a gap between the towers allows the break down the massing of the development and the development of public realm linking to the north/south route. This is a key difference from the extant 2017 permission. Amenity areas would be solely provided within the public realm and the ground floor of the towers (as well as within levels 47/31 and roof terraces), whereas the

extant served this through increased provision of internal amenity. Entrances to the ground floor to the residential lobbies, potential community space and the office space would activate the ground floor of the development. Some cycle storage and the refuse store would be provided within the ground floor towards the rear of the site with a separate servicing access from Lansdowne Road. Officers would appreciate Members thoughts on this matter.

6.33 Officers would like to see further information regarding the public access, given that the former Hotel use was open to the wider public and that Policy DM15 (e) requires public access to buildings taller than 40 storeys (noting the Building A is currently at 47 storeys).



*Figure 24: CGI showing tower A to right and Tower B to the left with the corner of Emerald House- Lansdowne Road*



Figure 25: Proposal showing the active frontages

## Layout

- 6.34 The proposal site is set to form the north-to-south strategic route from Sydenham Road to Lansdowne Road. This is achieved through a communal public “pocket park’ between the two towers, connecting to another pocket park to the rear of tower B, which is then linked to Canterbury Houses public realm provision. There is a parking area provided to the rear, however this would provide parking for disabled persons only. The new public access route and park provision provided between the towers and to Canterbury House is a positive of the scheme, particularly when compared to the extant 2017 permission (as seen in Figures 38 and 39 below). Furthermore, this follows the aspirations of the OAPF and the north/south pedestrian route, which is welcomed.
- 6.35 Officers are comfortable with the overall strategy of the site regard regarding the public realm adherence to the strategic route. However, the site still faces various constraints on the ground floor that need to be successfully adapted by the scheme. These competing elements, servicing strategy, emergency access and parking, should be delivered whilst providing a suitable public realm provision with adequate play and amenity space. Officers have shared concerns natural surveillance and legibility of the route, caused by the division between the pocket parks due to the servicing route and its expense of hardstanding. Furthermore, there is a concern that the rear pocket park will be closed off and developed as an ‘island’ between Canterbury House. Further development is required to evidence that these concerns are mitigated appropriately. Particularly, through surface treatment, wayfinding, art work strategy, visual site identity, fencing and boundary treatment etc. which can aid to connect the spaces. It is noted that within this iteration the applicant has introduced a community use at the junction of tower B and the two pocket parks, which is welcomed, but should be defined further to support its longevity and place within the scheme.
- 6.36 The current basement proposals adapt the existing basement on-site, to support plant, cycle and ancillary spaces. Back-of-house facilities are currently competing for space at

ground floor level which is limiting the street level activation of facades. Officers have challenged this and are encouraging the applicant to maximise basement space for Back of House facilities, which would allow further activation of ground floor spaces.

6.37 The latest iteration served to combine loading bays into one centralised bay. Whilst this does work positively to relieve the foot fall burden on either side of this, there are concerns the location of the planters in the streetscape block sight lines and easy of flow between the planters. This should be evidenced through walk-throughs and or details of the planters/ curbs. The location of the planters may need to be revisited.

6.38 Informal and integrated play opportunities should be maximised to serve both future residents and the wider communities in view of the current poor provision of play at all ages in this area of Croydon. The location of publicly accessible play space at ground level is indicated but needs more detail and an increased provision including through strategies such as 'play on the way' and woven into other parts of the public realm for example on Wellesley Road.. The overall provision for play space proposed denotes ground floor play areas, along with a nominal level of internal private play space. The detail on amenity space is covered in the Quality Section below.



Figure 26: Proposed site layout linking to wider area and strategic routes

6.39 It is noted that the omittance of private amenity space via external balconies has been driven in reflection of the microclimate conditions shown through the studies. This was due to the wind conditions created at the balcony spaces, particularly at the higher levels.

## Landscaping and Public Realm

6.40 Given the landmark status of the scheme it should be seen to set a high benchmark for the standards of development in the borough, specifically to public realm provision. The local plan aspiration for the Green Grid is set out in the Croydon Local Plan Policy SP7.3, and it would be expected to be woven into such development. Officers would look to support the provision and creation of new green and blue spaces with a particular focus on areas deficient in access to nature, play areas, and publicly accessible recreational open space; such as the central Croydon area and the New Town area specifically. Strategically, the scheme should maximise the opportunity to Improve access and links to and through green spaces that encourage walking.

6.41 The pocket park, and particularly the rear amenity space, contributes to the shared amenity play space calculations which are welcomed. However, it is felt the current layout should increase this provision, especially considering the amount of hardstanding shown, and also the reduced level of play space provision previously noted. More features could be woven into the wider landscape design to achieve this.



*Figure 27: Illustrative landscaping masterplan*



Figure 27: New public realm between the two towers



Figure 28: Play strategy

6.42 External communal amenity space will be provided in the central part of the site and on the roof of each tower, with internal amenity provided within each of the buildings. Given the build to rent typology, there would also be internal resident amenity at ground floor, with plans currently showing co-working space and on the top floor of each of the buildings the internal amenity is likely to include gym/fitness centre, entertainment spaces and children's play. Officers are in discussions with the applicants on child yield, the measures within the build to rent tenure, and whether the proportion of play space is acceptable. This is also discussed in further detail in the Quality Section below.

6.43 The projected footfall due to the proposal and the ambition of the strategic routes, needs to be accommodated. The applicant has introduced a chamfer as part of the microclimate mitigation, to the corner of Lansdowne Road and Wellesley Road, which would improve the previous concerns of a pinch point in the public realm and also pedestrian flows. However, further refinement of the public realm and pathway treatment is to be developed. Detailed public realm analysis of each elevation, including ground level viewpoints through strategic routes, must be provided moving forward.

6.44 Furthermore, the façades should work to explore nature based solutions, for example the ground floor activation could work to weave into the public green spaces through planting

features and SUDS. The introduction of ground-level climber planting scaling the façades allows for a feature installation whilst improving on the Urban Green Factor contributions.

- 6.45 Sense of Place is a key principle set out in the Public Realm Design Guide - establishing a strong sense of place is fundamental to ensuring a successful and relevant landscape design. The current design whilst modern in approach does not establish this and is felt to be homogenous and 'un-bedded' in design terms. Key to this is historic reference, cultural reference, public consultation, artistic collaboration, and local provenance (detailing, utilising local skilled manufacturing, local material and plant species selection informed by local landscape signatures and characters).
- 6.46 A public art strategy will need to be formed as part of any submission and the earlier that this is considered the more successful it will be. It is expected the Public Art strategy to be formed of one or a range of different interventions including play, landscape, wayfinding markers, murals, distinctive and bespoke architectural features and sculptural pieces. Public Art should be informed by Croydon and its diverse communities including through early and deep engagement processes led by a public art specialist. The applicant has submitted initial thoughts on this strategy including the use wayfinding in paving using the historical name of Lansdowne. This would add to the eligibility through the site and is welcomed by Officers as an initial idea prior to a fuller brief being formed.

#### Architectural Expression

- 6.47 Considering the landmark status of the scheme, its scale and siting within the New Town block, the design is expected to meet a high calibre of architectural expression. The current design requires considerable development in order to meet the calibre required of its status. In particular the massing articulation of the distinct portions of both buildings. Officers feel bolder and more distinct design moves are needed in the next round of development to address what is an overly generic design for both towers lacking character and distinct identity. This should be informed by character analysis but crucially, translated and evolved into a distinct language for the two towers enriching Croydon's evolving architectural heritage. Façade components and architectural expression should then follow this development accordingly and any microclimate mitigation be embedded into the architectural forms and details. The expression should also promote a slender form.
- 6.48 It is noted that both the towers are currently illustrated in white 'card' modelling without verified views or accurate context of Croydon. The applicant clarified that this is to aid in discussion moving forward with officers, whilst the key principles are developed. Whilst officers agree the current general gridded approach ties into the post war character of the wider metropolitan centre, there is concern the translation of this is generic and monotonous in articulation across the facades. The grid system denotes primary vertical façade extrusions that extend the scale of the towers and ground at the public realm; which is then topped by a recessed crown, cruciform shaft, a lower plinth level, and a chamfered base. As mentioned above, the lower plinth cantilevers incoherently above the public realm, but also appears flat and undefined when transitioning to the cruciform. Furthermore, as part of this development and mitigation the focus must be on ensuring the ground floor and 'plinth' level actively respond to the public realm and pedestrian experience.
- 6.49 As currently represented the fenestration detailing, spandrel definition, reveal treatment and bay studies are underdeveloped. The wider architectural strategy needs revisiting prior to these being further refined to visual interest across the façades. Furthermore each

scale needs to be imbedding heavily into character studies so to ensure the design is place specific and grounded into the context. Officers welcome Members views on the general grid approach and material palette for both towers.

- 6.50 Officers have concerns regarding the proportionately of the base, middle and top of the two towers and how they are read together within the street scene, particularly the lower floors and base. Officers would welcome the comments of Members in this respect. Officers are of the opinion that this concern was supported by PRP and should be one key focus moving forward.
- 6.51 The applicant has presented two variations of the crown configuration. One where the perimeter form is extruded to a flat top, and the other a hipped iteration to either size of the shaft. Whilst initial consideration is given to promote a slender form and reduced massing, officers feel the holistic level of detail and quality should be resolved further to determine the appropriate treatment to the crown.
- 6.52 Officers' concerns over the quality and variation of the façade typologies currently evidenced. The façades currently host two window bay typologies repeated, for the main faces and the inset corner bays. Whilst the tiering does provide some variance, the current fenestration strategy lacks reflection on climatic, contextual and design narrative that should provide a variety of conditions across the façade expanse. The repetitive bays and singular scale/divide of floor-to-floor banding across the faces create a fine grain which further accentuates the broadness of the mass in key views, particularly at the plinth level. While revising the overall architectural approach a clearer hierarchy and improved depth and quality detailing should be considered.
- 6.53 As above, the same massing, symmetrical design language and architectural features are replicated across the towers. Officers have concerns that the replication further emphasises the issues around the coalescence in townscape, and a muted language in the individual identity of each tower, particularly in street views. Features should complement one another across the two towers through common themes and transitions across the façade but still create unique characteristics between the towers A and B. Furthermore, Tower 'A' should be more prominent considering the landmark status, and additionally also serve as a townscape way-finding feature.
- 6.54 Officers find the two towers coalesce across various key views around Croydon, particularly along Wellesley Road and the Lansdowne Road approach. Complimentary tones and variations between the two buildings, evidenced through character analysis, to derive appropriate tonality should be undertaken by the applicant. The towers should read with distinct identity; and as above, it should be demonstrated that they achieve a slender form which contributes positively to the streetscape and skyline.
- 6.55 As previously mentioned, there is considerable impact through microclimatic wind downwash across the public realm and surround area that needs to be addressed. The applicant strategy for mitigation is reliant on façade components such as a perimeter canopies, vertical façade fins to the plinth and ground floor chamfers. Whilst the evidenced based data on the microclimate through these measures is still to be determined, the current design measures are post-rationalised and disjointed from any holistic façade and design strategy. Considering the scale and impact of these interventions, the proposed microclimate mitigation components should be embedded into design strategy and works further into rational.



6.56 Overall, Officers would welcome Members views on the architectural approach so far.



*Figure 29: Two iterations being discussed with officers-Looking onto Lansdowne Road*

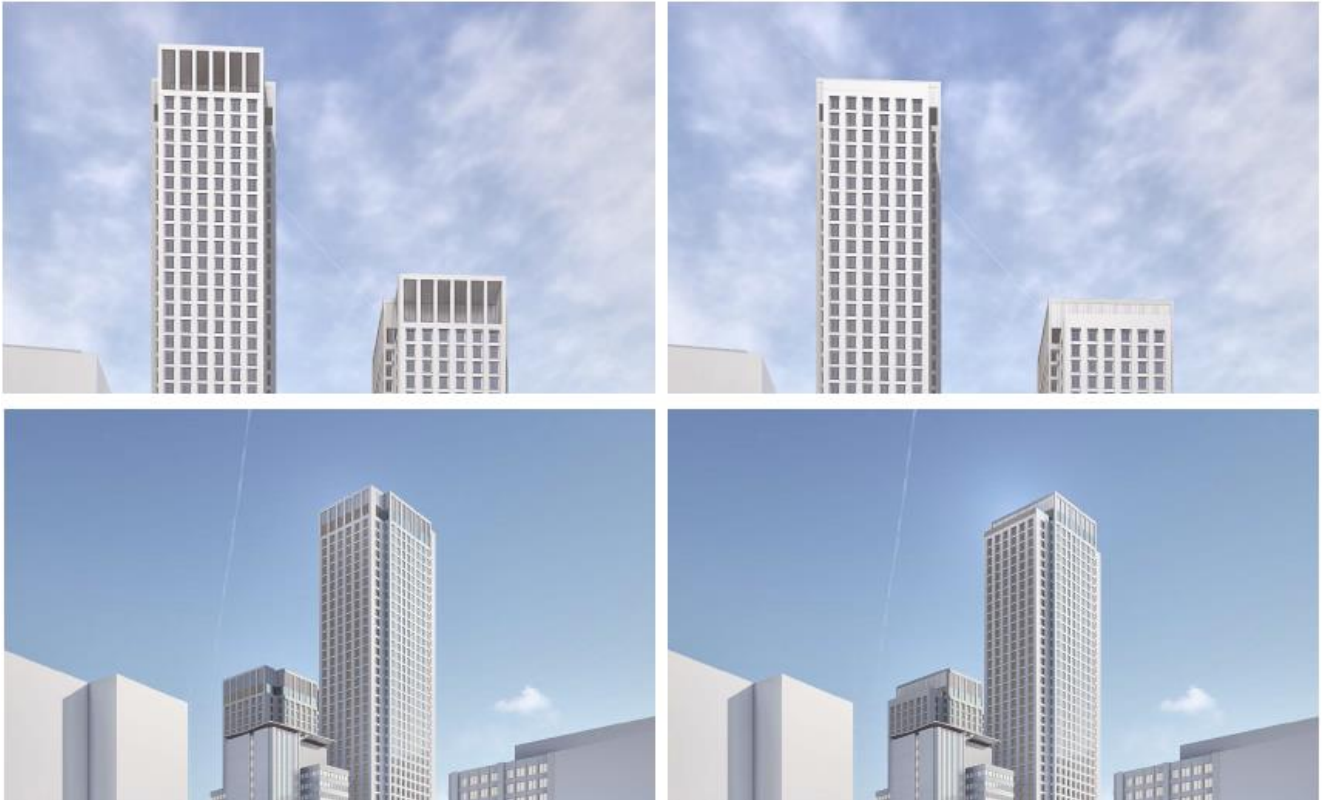


Figure 30: Images depicting the views and images of the suggested architectural features and materials

## Heritage

- 6.57 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 possesses. 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. 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.
- 6.58 The application site is not located within a designated conservation area, nor is the building statutorily listed. However, there are several heritage assets within Croydon Town Centre including adjacent conservation areas and listed buildings, most notably the Wellesley Road (North) Conservation Area, Central Croydon Conservation Area, Church Street Conservation Area, the Grade II listed Electric House, Grade I Hospital of the Holy Trinity Almshouses, Grade I listed Parish Church of St Michael and all Angels, Grade I listed Parish Church of St John the Baptist (Croydon Minster) and locally listed Corinthian House. Number One Croydon is a locally listed building and a landmark building.
- 6.59 A pre-application heritage analysis is included in the application documents and the scope largely agreed. The views including the Almshouses which was built in 1596-1599, are the key heritage impact and this was also highlighted in the extant 2017 permission.
- 6.60 Although the sky backdrop of the Almshouses has already been compromised by Whitgift Tower, it is still possible to appreciate the roofscape against a blue-sky background. The proposed towers would sit inside the sky backdrop of the Almshouses causing disruption

to the appreciation of its distinctive silhouette and would result in a less than substantial harm to the setting of the Grade I listed building.

- 6.61 Especially on the views from the west, where officers expressed concerns about the impact on the west façade (Tower A) on the Minister Church, it has been requested that the impact to be mitigated. Officers have agreed a provisional list of verified views with the applicant. The scheme is progressing well from these viewpoints however further testing is required to ensure that the towers do not appear overly dominant. Therefore, the Council would need to be convinced that the proposal has a striking appearance and a landmark quality being the tallest building in Croydon townscape and the harm would be outweighed by public benefits.

### **Impact on Adjoining Occupiers Living Conditions**

- 6.62 During the course of pre-application discussions concerns were raised in regard to the separation distances to Apollo House to the north and Emerald House to the east. With regards to Apollo House, this is subject to a site allocation with the Croydon Local Plan and careful consideration is required not to prejudice any future development and the outlook and daylight/sunlight of future residents of the proposed development at 1-5 Lansdowne Road (this pre application site).
- 6.63 In relation to Emerald House, this site has had various extensions and the previous office space has been converted to residential units. These residential units have been implemented (construction works related to this change of use had commenced at the time the 2017 extant planning permission was being considered) and this is now an occupied residential block. On the flank wall closest to the application site there are bedroom windows (and from an examination of the planning history, it appears to be the only window to each of the bedrooms that face towards the pre-application site). Careful consideration will be required as to the direct impact on these neighbours. Through the pre application discussions, officers have requested detailed information with regards to levels and the positions of windows and any balconies for the proposed scheme in relation to those bedroom windows in Emerald House to assess any direct alignment. Initial information provided by the applicant suggests this could be acceptable, however, full plans will need to be submitted.
- 6.64 Canterbury House is also to the north of the site and has also been subject to an office to residential conversion and is subject to a current planning application to extend the building for residential use. Careful consideration will be required as to the direct impact on these neighbours.

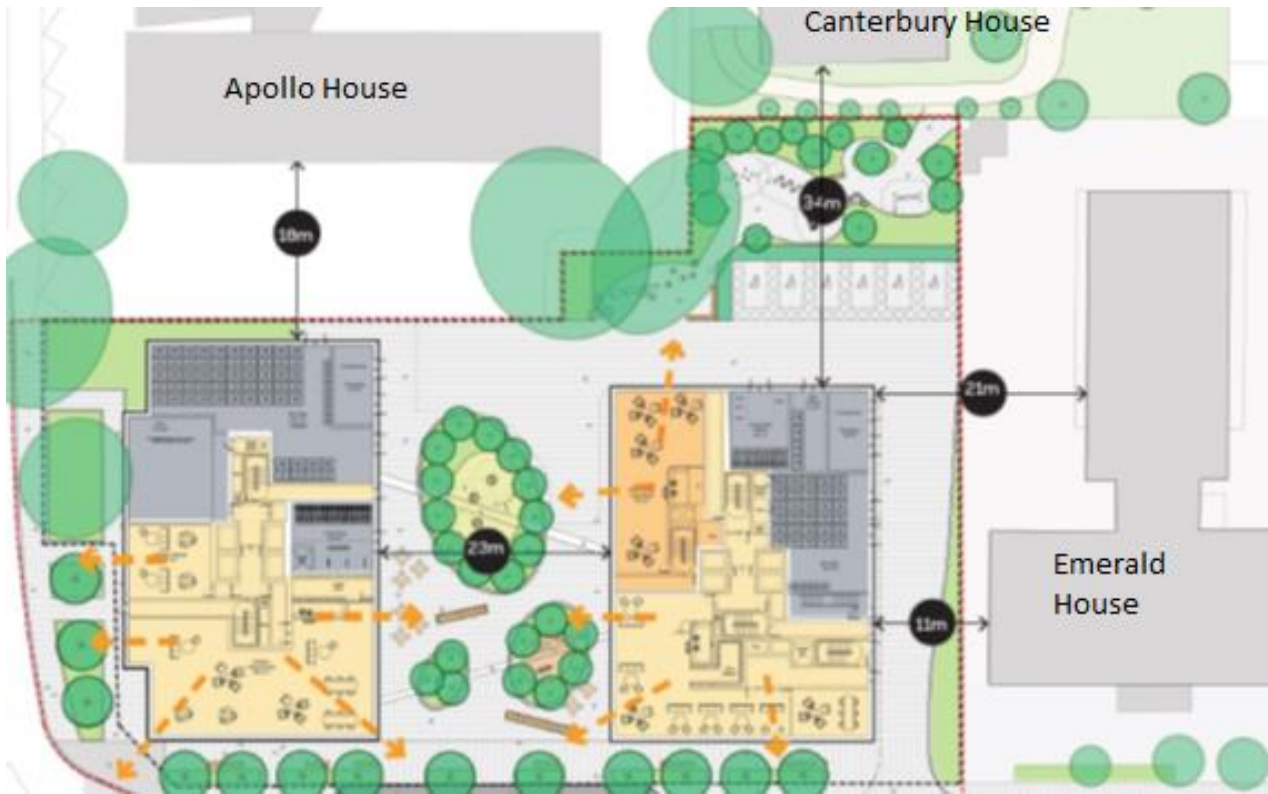


Figure 31: Separation distances from surrounding properties

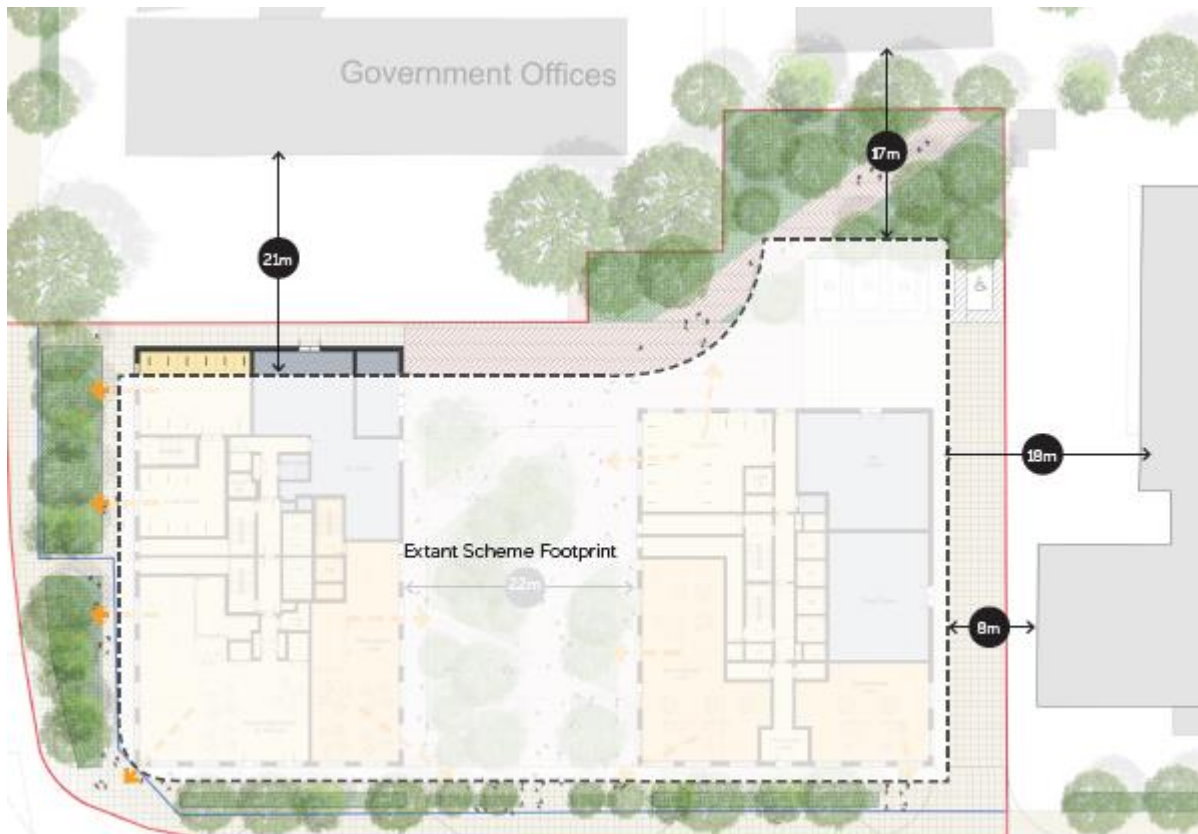


Figure 32: Separation distances on extant 2017 permission

6.65 There have been various iterations of the scheme during pre-application discussions, including layout of proposed flats, balconies and separation distances. The proposed separation distances between these residents and properties and the proposal are generally acceptable. The applicant is working on the placement of windows and the relationship with Emerald House. Cross sections and drawings have been provided in

the latest iteration balconies have been removed. Officers are currently of the view it would not be to a degree that would result in significant harm to the residential amenities, when assessed in the planning balance together with extant consent.

- 6.66 Other surrounding residential properties including Carolyn House and Cygnet House must also be assessed. The hotel opposite should also be included in analysis. The applicant has given a breakdown of the scope of the analysis of the affect upon the daylight and sunlight amenity which will be undertaken. This will be undertaken in accordance with the Building Research Establishment (BRE) Guidance (2022). The tests to be applied in assessing the reduction in daylight and sunlight are the Vertical Sky Component test (VSC), No-Sky-Line test (NSL) and Annual Probable Sunlight Hours test (APSH). In addition to assessing the effect of the proposed scheme in the existing baseline condition (proposed scheme verses the existing site and surroundings), the applicant will undertake a cumulative assessment that considers the pending planning application for Canterbury House, 2-6 Sydenham Road (22/03745/FUL), and a comparative assessment that considers the proposed scheme verses the 2017 permission.
- 6.67 The applicant has undertaken initial studies with regards to the proposed scheme compared to the light levels which the neighbour would have enjoyed were the consented scheme implemented. These show an improvement or no change in daylight and sunlight for the vast majority of windows and rooms from the effect of the 2017 consented scheme. The Council's independent consultant has highlight further areas of work and there needs to be more complete analysis undertaken before judgement can be made on the impacts of the proposed development on neighbouring properties. Officers are pursuing the full results to fully understand the extent of the impacts of the earliest date. This will also be review by the Council's independent consultant. At this stage, Officers are relatively comfortable with this relationship with surrounding properties, given its urban context but a full contextual evaluation will be required to demonstrate impacts have been limited as far as practicable.
- 6.68 Based on the direction the proposals are travelling in, Officers are generally supportive of the adopted approach; however further information is required to demonstrate that any harm has been limited as much as possible.
- 6.69 Third party comments received on any formal application will also need to be considered as part of any future scheme assessment.

### **Mix and Quality of Accommodation Provided**

#### Mix

- 6.70 Croydon Local Plan 2018 policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 allows for setting preferred mixes on individual sites via table 4.1. The provision of 10% 3-bedroom or larger units is the policy target for sites with a PTAL of 4 or higher within in a 'Central' setting. The Croydon Opportunity Area Planning Framework (2013) defines the site within 'New and East Croydon' where the requirements is for 10% of homes to be for families, consistent with DM1.1. The scheme currently provides for 10%, which meets the policy requirement.

#### Affordable Housing

- 6.71 Based on the applicant's financial viability assessment, they suggest that the scheme is not viable to deliver any affordable housing. Officers have sought independent review of this document and this work is progressing. Key matters such as the build to rent model (the forward funded approach), benchmark land level, rental values, build costs and operational costs are still being worked through.

6.72 Notwithstanding the viability position above, the applicant is, currently, offering 15% (by habitable room) affordable housing at a split of 70:30 in favour of discounted market rent London Living Rent. This will be as follows:

- 30% will be delivered as London Living Rent
- 20% will be delivered as Discount Market Rent at 80% market rent, capped at eligibility criteria within the London Plan
- 50% will be delivered as Discount Market Rent at 80% market rent in accordance with the National Planning Policy Framework

6.73 Whilst the split would accord with H11 of the London Plan (given the scheme is build to rent), the proposal to have 20 of these affordable units at a discount 80% of market rent, is not in accordance with the requirements of policy H11 of the London Plan, which requires this element of the affordable offer to be provided at a range of genuinely affordable rents. However, the proposal would accord with national policy in the NPPF. Officers have concerns with the offer and we would need to work with the GLA on this going forward. Currently, GLA officers are stating this 20% would not comply with the eligibility criteria in the London Plan, i.e. they would not be affordable to households on incomes of up to the current income cap of £60,000 and GLA officers would not treat these units as affordable housing when considering the scheme. However, we are alive to the current economic climate and would welcome feedback from Members.

6.74 It is very likely the scheme will need to be viability tested (on the basis it will not meet 35% on-site to be eligible for fast-track). Officers will seek to secure the maximum level of affordable housing deliverable on the scheme.

#### Quality

6.75 The current proposal is to provide circa 783 homes. Both Towers (A and B) are currently proposing fully serviced (Build to Rent) lobbies and co-working spaces. The residential units of Tower A would be accessed via two stair cores. The residential levels would contain 11 units per floor, with 6 from the northern side (with its own stair core) and 5 from the southern side (again with its own stair core). Within Tower B there would be 10 units per floor, again with two stair cores, with 6 from the northern side (with its own stair core) and 4 to 5 units per floor from the southern side (with its own stair core) Officers understand the approach adopted.

6.76 Officers and PRP have challenged the applicant to maximise dual aspect homes. Single aspect north facing units have been removed the scheme, Officers support the improvements made to this scheme in this regard. However, 7 units per floor in Tower A would remain single aspect and 6 per floor in Tower B. This is equivalent to the extant consent. However, it noted if there are fewer units per core, dual aspects units could be increased and therefore residential quality is increased. Housing developments should maximise the provision of dual-aspect dwellings avoiding single-aspect dwellings. To receive support, the proposal should also further evidence any mitigation through façade treatment and internal reconfiguration. Officers would welcome feedback from Members on this point.

6.77 The applicant has stated that minimum floor areas (London Plan and National Standards) will be achieved. Each of the units are now provided with 50% of the required external private outdoor amenity space within the unit (internal space) plus access to additional building wide amenities. The applicant has, therefore, provided oversized units given the air quality, daylight/sunlight, wind conditions and usability of balconies within the towers.

Further justification is required on these points for officers to support no private external amenity. This should be in the form of details of the internal amenity floor for both towers, external amenity space of both towers in the form of roof terraces, public realm and playspace. It is worth noting Ten Degrees has a similar arrangement with a mix of private internal space, no private amenity space and additional building wide facilities.

- 6.78 The current scheme has not yet evidenced calculations in reference to thermal comfort within the two tower dwellings. The application should evidence, particularly, with high-density tower blocks, over-heating risks, shading, passive ventilation and daylight provision is designed into the units.
- 6.79 Regardless of the final layout, daylight and sunlight adequacy analysis must be submitted to illustrate that all habitable rooms within the development achieve the minimum targets set by BRE Guidance. This should assess the future occupiers' light receipt against the 2022 BRE Guidance. The applicant has submitted a preliminary high-level report in relation to an earlier iteration of the scheme. This was shown as a percentage of rooms by floor and room type and therefore no individual rooms. This did show some lower percentages for the BRE target lux levels based upon room usage. The applicants is working on further design iterations including the current scheme which has removed balconies for example. Further daylight/sunlight information will be required to enable officers to take a view on acceptability and this information will also be independently reviewed.
- 6.80 Landscaping plans have been provided and the applicant is working with officers, to demonstrate how communal amenity space and playspace will be provided within the central pocket park and amenity space to the rear at ground floor level and on the roof top amenity. Internal space is also proposed to be provided and does include children's playspace. Discussions have focused on the public realm and playspace.
- 6.81 Currently the applicant is proposing that under 5's/doorstep play will be provided within the central garden square and playable space for older children will be provided in the north eastern part of the site. However, it is noted that there are significant shortfalls for London Plan requirements, with the majority of play potentially for older children proposed to be provided off-site through a financial contribution. The applicant recognises the shortfall and has prioritised the provision of play for younger children. Any off-site provision would need to show that a safe pedestrian route exists to reach this space and be considered in connection with the Council's needs.
- 6.82 The applicant has also provided detailed floor layout for the communal amenity areas (which are typical of the Build to Rent model). This includes a children play room (25 sqm) in each tower. There are also an area for a cinema room, games room and dining areas which can be hired for children's parties, for example. The south facing roof terrace could also have movable play items. The applicants also indicated the ground floor could have a flexible amenity space which could be used by families. This ground floor area should be fully explored so playspace is fully optimised. It is also noted this offer is an improvement on the Ten Degrees scheme. However, the assessment must be based on up-to-date data, planning policy and the planning merits of this current scheme. Officers have also requested full detail about child yield in Build to Rent schemes so a judgement can be made with regards to the acceptability of the offer. Officers would welcome Members views on the amenity space with particular regards to the playspace offering.



Age	Play Requirement	Play Provision
Under 5	677 sqm	150 sqm
5 to 11	442 sqm	190 sqm
12+	147 sqm	80 sqm
Total	1266 sqm	420 sqm

Figure 33: Showing the GLA play requirements and the proposed play provision on the site.



Figure 34: Playspace provision.

6.83 The applicant is aware that housing should cater for residents' changing needs over their lifetime and that 10% of units would need to be wheelchair accessible and 90% adaptable. Appropriate facilities, furniture, storage and turning space must be demonstrated on the plan's come submission.

6.84 The applicant should note D5 of the London Plan in relation to the need for a fire evacuation lift per core, and a fire statement will be required as part of any formal submission (D12 of the London Plan). The applicant has advised that the buildings have been designed to meet current fire regulations, including Gateway One. The Health and Safety Executive will be a formal consultee on any future planning application. Initial discussions have taken place with the HSE, London Fire Bridge and the Council Building Control Officer and fire safety is being designed into the building at this pre application stage and to include the requirement for two stair cores.

6.85 The impact of noise and air quality on residential amenity will need to be considered, especially as the surrounding roads make up a busy part of the road network. The applicant will need to demonstrate how internal areas and external areas achieve an acceptable standard; accordingly, noise and air quality assessments are expected with any future application. Suitable passive ventilation and avoidance of overheating will need to be demonstrated.

### **Highways and Transportation Matters**

6.86 The site is situated in an area with an excellent public transport accessibility level of 6b and is within a short walk of East Croydon Train Station. A Transport Scoping Note and draft Refuse Strategy have been submitted as part of the pre application and discussions are ongoing with officers.

### **Residential Parking**

6.87 Given the sites highly accessible location the scheme would be expected to be car free, with the exception of only blue badge parking within the site in line with London Plan and Local Plan policy. London Plan policy is for a 3% provision of blue badge spaces, which equates to approximately 23 spaces. The applicants have complied with the requirement for the development to be car free and only blue-badge parking is currently provided. The proposal is for 5 spaces to be accessed from Lansdowne Road. This is less than the London Plan requirement. Given the accessibility of the site and the benefit to the proposed public realm, officers consider that a lower provision would be suitable in this location and would further encourage the use of sustainable modes to travel. The applicant also has provided an initial Transport note detailing the accessibility of the local rail (West and East Croydon stations) and tram services.

6.88 On the basis the site is within a CPZ, and the development is proposed to be car-free, it is expected that the developer enter into a legal agreement to ensure future residents will be prohibited from applying for on-street parking permits, thereby controlling parking availability and parking stress within the CPZ. Subject to full justification, the level of parking which has been discussed with TfL, is acceptable at this stage.

#### Car Clubs

6.89 A car club space must be considered. The costs of providing this on street in the area would be borne by the developer. Zip Car operates in the Croydon area and as such this demonstrates a demand for car clubs within the area. In addition, membership for three years for all future occupiers would be secured within any legal agreement.

#### Cycle parking

6.90 The proposed development is seeking to include long stay and short stay cycle parking accordance with the London Plan and London Cycling Design Standards (LCDS) requirements, for both the residential and non-residential uses proposed. A number of built-in cycle storage spaces have been shown in the basement and at ground level and within buildings in various iterations of the scheme. At this stage the detailed storage capacity is not known, but the applicants have been made aware of the above requirements and have indicated their intention to meet them. Provision of larger adaptable bicycles (5%), as well as electric bicycles, must be incorporated.

#### Access/Servicing

6.91 A servicing bay is proposed to be provided on Lansdowne Road. Further details would be secured as part of a S278 agreement with the Highways Team at the legal obligation stage. Subject to full details the access and servicing arrangements are considered appropriate for a site of this size and scale. In terms of refuse collection that would take place to the rear of the site and initial tracking has been submitted. At this time, it is considered appropriate for servicing requirements.

6.92 An Active Travel Zone assessment will be required, in accordance with TfL's latest guidance, to demonstrate that there are suitable opportunities for all future users of the proposed development to access local amenities by walking, cycling or public transport in line with the Mayor's Healthy Streets approach. This may require improvements to routes to East Croydon Station and the town centre beyond, borne by the developer.

6.93 Details of the delivery and servicing strategy will be required, as well as construction logistics.

#### Mitigation

6.94 Contributions (starting point being £1,500 per unit) towards improvements to sustainable transport will be required and an additional contribution to a pedestrian link across Wellesley Road, along with the restriction of access to parking permits in the Central

Croydon CPZ, car club provision / membership and EVCP infrastructure, will also be required. Highway agreements will be required for all changes to the public highway and the adoption of widened footways and service bays, as well as upgrades to pavements and landscaping around the site required as a result of the provision of a tall building.

6.95 Transport for London are likely to have further requirements and financial obligation requests.

## **Environment**

### **Building performance**

6.96 All major development, such as this, should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.

6.97 The applicant has indicated that the proposed development would be Net Zero Carbon which is welcomed. As this scheme will be referable to the Mayor the whole life-cycle carbon emissions should be calculated through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate action taken to reduce life-cycle carbon emissions. As a GLA referable scheme it will also need to include a Circular Economy Statement that aims to be net zero-waste. Heat Risk needs to be managed and water consumption restricted.

6.98 Given that work is mainly still on going in relation to the townscape and transportation matters the majority of these elements are still being developed and further detail will be known when the scheme is advanced. The scheme should be able to meet these requirements.

### **Flooding**

6.99 The site is located within in a surface water and ground water flood risk area and is also subject to critical drainage flooding. In accordance with Policy DM25.1 and Table 8.1 of Croydon's Local Plan all development on sites at risk from other sources of flooding area required to run a sequential test and exception test.

6.100 A site-specific Flood Risk Assessment proportionate with the degree of flood risk posed to and by the development, taking account of the advice and recommendations within the Council's Strategic Flood Risk Assessment and Surface Water Management Plan, is required.

6.101 Subject to satisfying the above requirements and priority given to the provision of Sustainable Drainage Systems (SuDS) unless demonstrated to be inappropriate, the principle of residential development would be acceptable. This must be integrated into the development, such as the use of nature based SuDs in the public realm areas.

6.102 An initial Flood Risk Assessment and Drainage Strategy has been submitted which highlights the importance of SuDs. The applicants have engaged with the Lead Local Flood Authority (LLFA) as a separate pre application process and discussions are on-going.

### **Air Quality**

6.103 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). As indicated above, an air quality report will need to be submitted with any application. This must include how the ground floor residential units, amenity areas and balconies fronting the adjoining roads are suitable from an air quality perspective. Should the development increase air pollution or be located in an area subject to breaches then mitigation will be required.

#### Microclimate

6.104 The applicant has begun to explore wind impacts and what mitigation would be required. This is critical given the current wind conditions near East Croydon station, along Wellesley Road and Lansdowne Road and the applicant must work carefully with Officers to ensure the correct scenarios are tested, with the correct cumulative schemes in place and wind tunnel tested. A preliminary wind assessment has been submitted on a previous iteration of the scheme. The initial results show significantly windier conditions around the site and in amenity areas. In particular, there are potential safety risks in Lansdowne Road to the south east and between the site and Apollo House to the north west.

6.105 It is recommended that mitigation for these issues is embedded within the design, including the Wellesley Road elevation of the proposed development. Individual trees are not recommended for the mitigation of the safety issues, due to the risk of the trees failing.

6.106 The current scheme has been designed to take into account the initial microclimate results. Officers have advised that any mitigation must be designed in from the outset as opposed to being an afterthought. A number of mitigation measures are being tested and considered by the applicant including canopy design, façade vertical fin elements, corner chamfering, ground-level windbreaks and introducing a porous façade around bike storage. These have not been fully tested at this stage. Officers are working with the applicant on these solutions and the impact on the design of building. Discussions at this stage are ongoing. The wind assessments and results will be independently tested and consultants are on board as part of the pre-application discussions and methodology agreed. Officers are comfortable that discussions are progressing well. However, any mitigations that affect the design of the building will need to be fully explored prior to the submission of any future planning application.

#### Trees and biodiversity

6.107 The site is subject to Tree Preservation Order, 4, 1999 which covers 4 trees on Lansdowne Road.

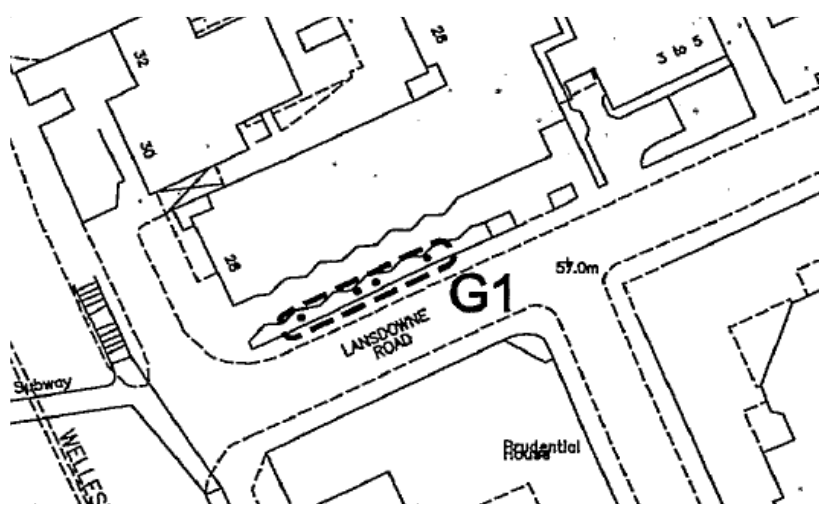
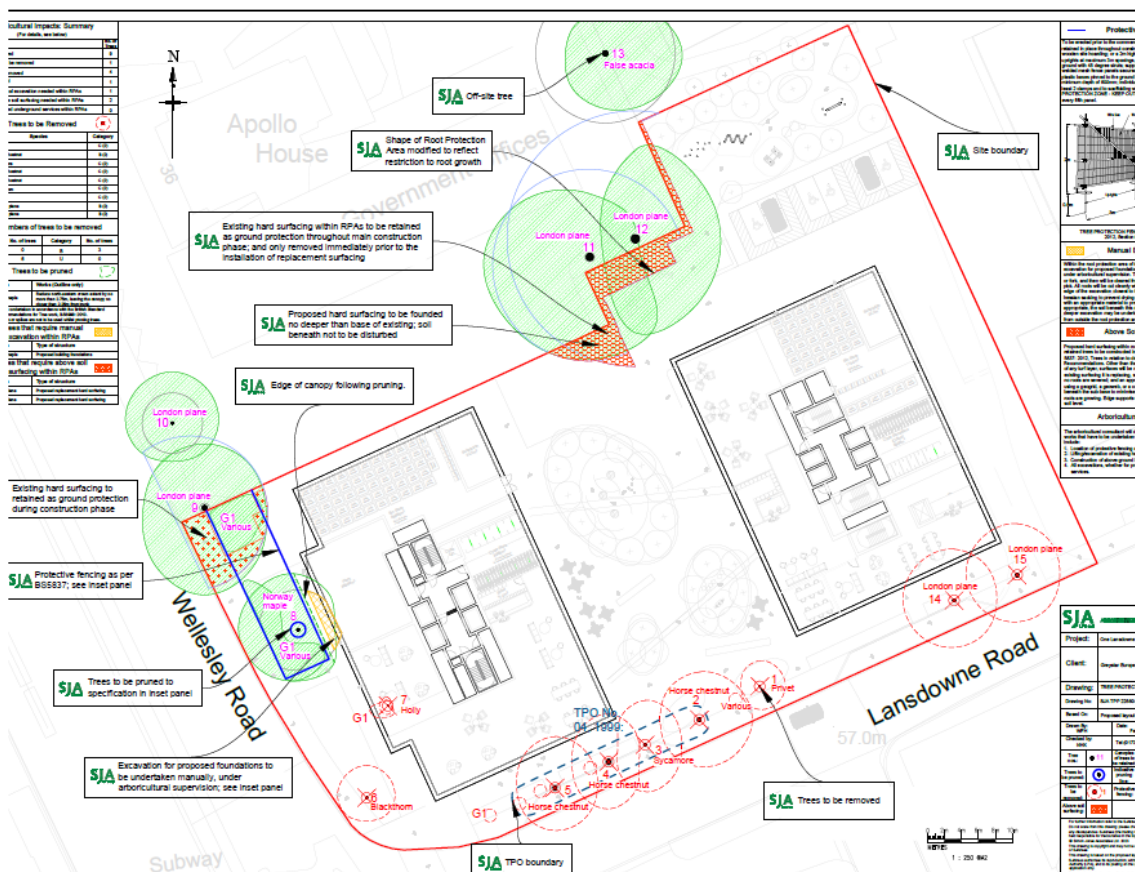


Figure 35: : TPO 4, 1999

6.108 There are other trees on Lansdowne Road and Wellesley Road which are not covered by the Tree Preservation Order (TPO). Of particular note are the two London Plane trees in front of Marco Polo House. The applicant has submitted an Arboricultural Implications Report. To accommodate the development nine individual trees and part of one group of trees and shrubs are proposed to be removed as set out below:

Tree no.	TPO No.	Species	Height	Trunk diameter	Age class	BS category
1	-	Privet	4.5m	x10 stems @ 70mm @ 0.5m	Young	C (2)
2	G1 04/1999	Horse chestnut	14m	480mm	Semi-mature	B (2)
3	G1 04/1999	Sycamore	13m	335mm	Semi-mature	C (2)
4	G1 04/1999	Horse chestnut	14.5m	570mm	Mature	C (2)
5	G1 04/1999	Horse chestnut	13.5m	480mm @ 1.3m	Semi-mature	C (2)
6	-	Blackthorn	4m	X8 stems @ 80mm @ 0.5m	Young	C (2)
7	-	Holly	4.5m	80mm est. 90mm est.	Young	C (2)
14	-	London plane	15m	360mm	Semi-mature	B (2)
15	-	London pane	15m	400mm	Semi-mature	B (2)



Figures 36 and 37 : Table and plan from the applicants tree survey showing trees to be removed

6.109 This includes all the TPO trees and all trees along Lansdowne Road and other trees on Wellesley Road. The applicant has provided justification within the submitted report. 6 of the trees to be removed are category C trees and these are either of low quality, low value or have short term potential and concluded their removal will have no significant

impact on the character and appearance of the area. Officers accept these conclusions. Three category B trees are to be removed. This is the Horse chestnut under the TPO and the two London Planes . With regards to Horse chest, this demonstrates below normal physical condition and historic wounds and one decay. The removal is accepted by Officers.

6.110 In relation to the London Planes, justification for the removal is given due to the limited visual contribution to the wider locality taking in account the pruning that has occurred. It is concluded that the removal would not have a significant impact on the character of the local area. The removal is regrettable to facilitate development, however, it is noted within the extant 2017 permission, the removal of all trees, including the TPO trees was accepted. It is noted that the proposed landscaping within the current pre application proposal, allows for more tree retention (on Wellesley Road), more areas for landscaping and replacement planting. A major positive of the current scheme is the removal of the podium and the introduction of the public realm between the buildings. Due weight must be given to the extant 2017 permission.



Figure 38: Indicative proposed landscaping scheme

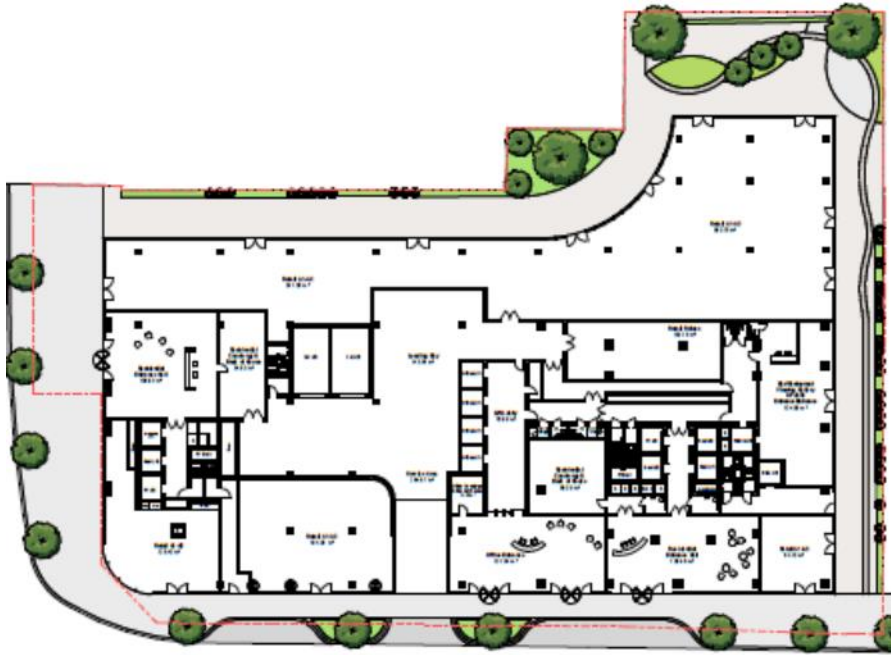


Figure 39: Comparison with extant 2017 permission

- 6.111 Additional planting is proposed and must be an integral element of the design of the scheme and the overall public realm and landscaping strategy. Full details of the types of replacement planting is required including types and species to ensure these are worthy replacements.
- 6.112 London Plan Policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site. This scheme should achieve a target score of 0.4. Currently, the proposal is set to achieve a UGF score of 0.38. However, officers feel the target score should be met. Urban Greening Factor score needs to be improved. This can be derived through many routes. Vertical greening such as climbers on wiring can achieve points for 'green wall' under UGF scoring as well as intensive 'green roofs' with minimum 150mm substrate depth. Additionally, mid-level communal gardens can be a viable option.
- 6.113 The NPPF and London Plan Policy G6 require that any development seeks to provide biodiversity net gain. Such details will need to be worked through as the scheme progresses and must be integrated into the scheme. Full details will be required at application stage.
- 6.114 An EIA Screening Opinion (22/05177/ENV) was issued prior to the submission of the planning application. The development was not considered to require an EIA, taking account of its location, nature, scale, and characteristics.

### **Other Matters**

- 6.115 Both the NPPF and London Plan Policy seeks to create safe, secure and appropriately accessible environments where crime, disorder and fear of crime do not undermine the quality of environment. Any future application should be mindful of Secured by Design principles and improve natural surveillance / lighting of the area. Initial discussions have taken place with Metropolitan Police Designing Out Crime Officer for Croydon.
- 6.116 In line with Policy DM16 of the Croydon Local Plan (2018) a health impact assessment will need to be submitted with the planning application.

## **Mitigation**

6.117 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions are progressing in relation to the Heads of Terms, but it is anticipated that these would include the following (this is not an exhaustive list):

- Affordable Housing (on-site)
- Affordable housing review mechanisms (early and late stage)
- Build to rent criteria and covenants
- Employment and training contributions and obligations (construction/operational)
- Playspace contribution
- Air Quality contribution
- Zero carbon offset (if required)
- Sustainable transport contributions (to include surface level pedestrian crossing on Wellesley Road)
- Car parking permit restrictions
- Car club provision and membership (3 years free)
- Travel Plan
- Transport for London contributions
- Public realm delivery and maintenance including allowing the public to pass and repass within the public realm areas
- Securing pedestrian link to the north, with public plaza and public realm areas and neighbouring site
- Street trees provision and maintenance
- Highway works including loading bays and footways
- Wind mitigation
- Television signal mitigation scheme
- Retention of scheme architects
- Free public access into building(s)
- Relevant monitoring fees

## **7 SPECIFIC FEEDBACK REQUESTED**

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

1. The principle of tall buildings across the site, with the tallest storey tower on the corner of Lansdowne Road and Wellesley Road.
2. The amount and distribution of scale/bulk/height across the site, including the context of adjoining heritage assets.
3. The approach to public realm, private amenity space, internal amenity space playspace and communal space
4. The approach to residential quality.
5. The design approach and elevational detail including materiality of both buildings (Tower A and Tower B).
6. The 15% affordable housing provision.
7. The potential impacts on neighbouring residential amenities in terms of light, outlook and privacy.
8. The importance of microclimate, urban greening, trees, biodiversity and sustainable drainage.

## **8 PROCEDURAL MATTERS**



- 8.1 The applicant has submitted a pre-application to the GLA for an initial opinion on the proposals. The meeting took place on the 28<sup>th</sup> October 2022 and Officers were present at this meeting. The assessment summary stated:
- 8.2 *The proposal for the comprehensive redevelopment of the site for a mixed-use, residential-led development to deliver circa 770 units within an Opportunity Area does not raise strategic concerns regarding land use principles, subject to determining the optimum quantum and nature of the office provision and the replacement of any existing social and community infrastructure. The applicant should continue to undertake wind, daylight and sunlight assessments which are critical to the layout of the scheme and successful delivery of public realm spaces. The link and green space to the north part of the site to Canterbury House is welcomed and requires careful design consideration to ensure this is safe, active and accessible space. Further consideration is also required regarding reducing single aspect units, materiality, play space, amenity and heritage matters, including providing a detailed heritage and townscape analysis addressing Policy D9 of the London Plan. Transport matters raised with regards to a TA, car parking, cycle parking and servicing should also be addressed.*
- 8.3 *The future application will need to address the issues raised in this report with respect to housing, urban design, heritage, transport, sustainable development and environmental matters. A follow up meeting should be affordable housing and viability to progress the key next steps above.*
- 8.4 GLA Officers encouraged the applicant's team to review the comments from Officers and re-engage through their pre-application process prior to the submission of a planning application. The second meeting with the GLA has taken place on 22<sup>nd</sup> March 2023, officers are awaiting the formal response.