

1 DETAILS OF THE DEVELOPMENT

Ref: 17/03978/PRE
Location: 233 High Street, Croydon
Ward: Fairfield
Description: Demolition of existing buildings, erection of 3 residential (C3) blocks comprising approximately 300 homes, and a 2-storey building for retail (A1) and restaurant/café (A3) use, with new public realm and associated works.
Applicant: FI Facilities Management Ltd (Patrick Sheridan)
Agent: Deloitte LLP (Mark Underwood and Amy Hartley)
Case Officer: Jan Slominski

2 EXECUTIVE SUMMARY

- 2.1 The proposed scheme is a mixed use, residential led development comprising three residential blocks. Blocks A (facing the high street) and B (behind Block A) would be 21 and 19 storeys high, and Block C (on the corner of Edridge Road and Mason's Avenue) would be 5-6 storeys. There would be 294 units in total.
- 2.2 The existing retail units facing High Street would be demolished and replaced with new 2-storey units facing a public square adjacent to High Street, with new landscaping and trees. There would also be communal landscaping and playspace for the new residential units.
- 2.3 The scheme has developed through a series of pre-application meetings including consideration by the Place Review Panel (PRP) and initial viability testing. This has been focussed on defining the appropriate height and mass of the different elements; the impact on heritage (in particular in long views); and affordable housing delivery.
- 2.4 The views of members are sought on the proposal, with particular regard to the following key issues:
- Affordable Housing
- 2.5 Various options have been considered with regard to the proportion, tenure and location of affordable housing units, explained in further detail below. Due to design constraints, the smaller block (C) would provide approximately 32 affordable rent units, with the rest of the affordable housing within Block B.
- 2.6 The views of members are sought as to the additional weight afforded to social rent units (which are more affordable than "affordable rent") albeit with a smaller proportion of affordable housing overall. Views are also sought as to whether the provision of a greater amount of affordable housing would justify taller buildings on the site.

Design and Heritage

- 2.7 The Development Plan supports tall buildings on the site in principle. Having reviewed PRP comments and CGI heritage views, officers consider that Block A at 21 storeys and Block B at 20 storeys would result in less than substantial harm to the settings of the affected heritage assets. This could be justified by sufficient public benefits.
- 2.8 The views of members are sought as to whether increased height (Block A at 28 storeys and Block B at 23 storeys) could be justified by additional affordable housing.

3 BACKGROUND

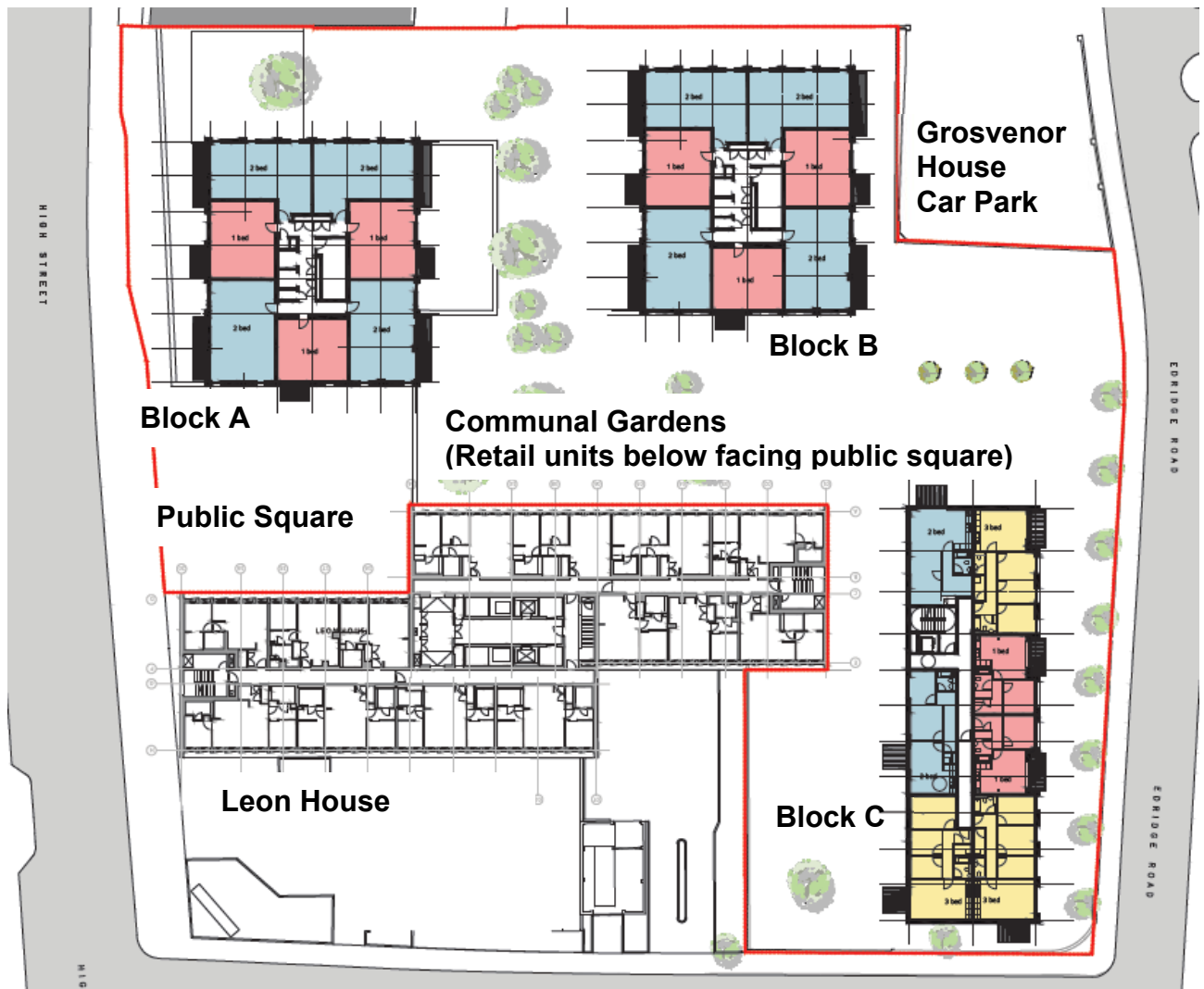


Figure 3.1 Annotated Level 2 Site Plan

Site and Surroundings

- 3.1 The site area is approximately 0.8 hectares. It is located between High Street; Masons Avenue; and Edridge Road, south of the Town Centre's Main Retail Frontage and within the Croydon Metropolitan Centre (CMC). To the north along High Street is the southern end of the Town Centre's Main Retail Frontage, and further to the south is the Restaurant Quarter on South End.
- 3.2 The site is directly adjacent to Leon House, which is a former office building currently being converted to residential accommodation (see paragraph 3.14 below).

- 3.3 There are significant level changes, such that the frontage onto Edridge road is approximately 2 storeys higher than High Street. The site is within the Croydon Opportunity Area (COA) (policy DM38.1). The COA Framework describes its location as the “Southern and Old Town” area and the Croydon (Housing) Typologies Report (Maccreanor Lavington, 2010) identifies the site within the “Southern Gateway area” and potentially attractive to family dwellings.
- 3.4 Edridge Road is a quieter street with residential character, with larger buildings to the north of the site, and a tightly defined street edge with modest 2-storey terraced houses to the south and east side of the site.
- 3.5 Mason’s Avenue is a short road to the south of the site, with an unattractive area of public realm and car parking for Leon House to the north, and buildings of varied heights to the south including the recently refurbished Centrillion Point.
- 3.6 The site’s Public Transport Accessibility Level (PTAL) is 6A, which indicates excellent accessibility. High Street and Edridge Road are both Classified Roads, and Edridge Road joins Park Lane (the flyover) which is part of the TFL Strategic Road Network.
- 3.7 The site is not within a Conservation Area, but is adjacent to an Archaeological Priority Area. There are no heritage assets on the site, nor directly adjoining, but Wrencote House (Grade II* Listed) on High Street is very close.
- 3.8 Tall buildings on the site would potentially be visible from the setting of a number of heritage assets, including St. Andrew’s Church (Grade II), Whitgift Hospital (Almshouses) on North End (Grade I) and Croydon Minster (Grade I). Notably, the site is in the background to the protected view of the Town Hall tower from North End, and the view of Croydon Minster from Rectory Grove (identified in the Croydon Minster CAAMP SPD as a significant view).
- 3.9 The site is within Flood Zone 1 (Low Risk) and partially within an area where there is potential for groundwater to occur at the surface.

Constraints

- 3.10 The application site is within the Croydon Opportunity Area, and subject to Site Allocations SA190 and SA195.
- 3.11 Site Allocation 190 (Car Park to the rear of Leon House) is for residential development, with an indicative 56-162 homes. Site Allocation 195 (Leon House, 233 High Street) is for conversion of the existing building, with an indicative 26-145 homes.
- 3.12 The sites are adjacent to Site Allocation 32 (4-20 Edridge Road) which is also for residential development, with an indicative number of 180-220 homes.
- 3.13 Together, the three sites have potential to deliver a significant number of homes. However in order to deliver high density development tall buildings would be required, and each development proposal needs to avoid harm to views of heritage assets, as well as avoid prejudicing redevelopment of the adjacent site(s).
- 3.14 The Grosvenor House Car Park on Edridge Road is adjacent; it is not owned by the site’s owner and they have been encouraged to try and purchase it. Any development proposal will need to account for potential future redevelopment of the Grosvenor House Car Park to avoid planning blight.

3.15 The site is located on a fairly steep slope and has 3 levels (High Street; Masons Avenue; and Edridge Road). The drop in height across the site varies but is approximately equivalent to a 2-storey level change.

Planning History

3.16 The site is in a heavily built up area and a number of sites nearby have been (or are currently) subject to redevelopment works. The adjacent Leon House is in the same ownership and is being converted (predominantly from offices) to residential use with the following planning history:

- Prior approval granted for use of floors 1-7 and 9-20 as 249 flats (applications 15/02926/GDPO, 15/02927/GDPO, and 15/02928/GDPO).
- Planning permission granted for external alterations (including replacement/additional glazing, of new entrances, communal roof terrace, landscaping and associated works) (applications 16/01467/P and 16/06157/FUL)
- Planning permission granted for alterations and use of floor 8 as 9 residential units (application 16/01467/P)
- 17/04817/FUL – Decision pending for Change of use of the eighth floor of Leon House from Class D1 use to 14 no. residential units.

3.17 Bauhaus / Centrillion Point on Mason's Avenue was subject to planning application 04/03575 approved 29 Sep 2005 for Alterations and erection of extensions to provide a community/retail unit on part of ground floor, 100 two bedroom, 78 one bedroom, 6 three bedroom flats in the remainder of building and erection of 5 two bedroom mews houses; formation of vehicular access and provision of associated parking."

3.18 Impact House, 2 Edridge Road is currently being converted to residential units, following applications 16/04750/FUL, 16/02182/P and 15/02723/GPDO for change of use from offices to residential units, and external alterations.

4 PROPOSAL

Proposal

4.1 The proposal would partially demolish the existing buildings on the site, would extend the retained basement/ground level car park for Leon House, and would erect three residential blocks.

4.2 Block A would front High Street, on the lower part of the site. It would be 21 storeys high, with a 2-storey plinth fronting High Street.

4.3 Block B would be 20 storeys high, on the upper part of the site level with Edridge Road), and due to the site's topography would have a similar overall height to Block A.

4.4 Attached to Blocks A and B would be a ground and first floor extension, which would provide 2-storey retail/restaurant units facing a new public square adjacent to High Street, and an outdoor amenity area for residents above (level with Edridge Road).

4.5 Block C would be a 5 storey affordable rent block on the corner of Edridge Road and Mason's Avenue (with shared ownership / intermediate housing in Blocks A and/or B).

- 4.6 The public realm would result in a car-free, pedestrianised environment including public, and semi-private amenity and playspaces.

5 MATERIAL PLANNING CONSIDERATIONS

Principle of the Proposed Development

- 5.1 The site is not within a Conservation Area, and is within an area where tall buildings are acceptable in principle. There is good access to public transport, and the site allocation(s) support high density residential development. In principle, the demolition of the existing retail and office accommodation, and erection of a high density mixed use residential-led development (including re-provision of existing retail) is acceptable.

Affordable Housing

- 5.2 The Council's planning policies in the site's location require 15% affordable housing on-site (as a policy compliant 60:40 mix of affordable rent: shared ownership) as a baseline minimum, with donor sites or a review mechanism required where less than 30% is provided on-site, and a target for individual sites of 50%.
- 5.3 At pre-application stage, a high-level viability appraisal has been undertaken, and independently assessed. The independent assessment looked at two options; Option 1 is the proposal which officers have indicated may be acceptable (with Block A at 21, Block B at 20 storeys and Block C at 5 storeys), and Option 2 includes an additional 11 storeys of accommodation across the blocks (with Block A at 28, Block B at 23 storeys, and Block C at 6 storeys).
- 5.4 The financial viability of the proposed development is still being considered (and is subject to independent scrutiny). Early indications are that Option 1 would not viably provide sufficient affordable housing to be acceptable, and that Option 2 could potentially provide approximately 1/3 more affordable housing than Option 1, which would (subject to a review mechanism) deliver in excess of the minimum requirement, and may include some social rent units in accordance with the Council's priority need.
- 5.5 Officers are working with the applicant to explore alterations to the scheme which could increase the amount of affordable housing provided.
- 5.6 The different tenures could be logically located within the proposed residential blocks, to facilitate on-site delivery.

Townscape and Design

Place Review Panel (PRP)

- 5.7 An early version of the scheme (with Block A at 15 storeys and Block B at 27 storeys) was presented to PRP in January 2018 which, in summary, made the following observations:
- The scheme could cause significant harm to the Grade I listed Croydon Minster.
 - It may represent overdevelopment and the proposed density should be reviewed.
 - A wider site boundary should be considered, to include the Grosvenor House Car Park and the space at the corner of the High Street and Mason's Avenue.

- Further work is required to resolve the following issues: setting of designated and non-designated heritage assets, height and density, daylight and sunlight, and quality of the public and communal amenity spaces around buildings.

5.8 Since the PRP review, additional views have been provided to assess the impact on views of Croydon Minster, and the positioning and massing of buildings across the site has been amended to allow improved public realm, amenity spaces, and daylight and sunlight. Block B has been reduced in height (from 27 to 20 storeys) to limit its impact on long views of Croydon Minster, and Block A increased in height from 15 to 21 storeys but now set back behind a 2-storey plinth to limit its impact on High Street.

Layout and Massing

5.9 Officers are broadly comfortable with the massing and layout of the proposed new buildings in principle. However there has been little discussion with the owners of 4-20 Edridge Road and there are concerns that the proximity of Block B to the site boundary may prejudice the most efficient use of land on both sites (and the Grosvenor Car Park site). The developers have been encouraged to work together to develop design solutions which take a placemaking approach and allow logical and practical redevelopment options on the adjacent sites.

5.10 The heights of the buildings have been subject to high-level views testing (although not verified at this stage). The PRP reviewed an earlier version of the scheme (with Block A at 15 storeys and Block B at 27 storeys) and advocated lower building heights. Officers also raised concerns that if increased in height, Block B would result in unacceptable harm to views of the Croydon Minster from Rectory Grove, and although the heritage impacts of Block A are less significant the impacts on the public realm need to be considered. Block B was since reduced in height to avoid unacceptable harm to views of the Minster, and Block A was both reduced in height and set back behind a 2-storey plinth to reduce its impact on the public realm. Although the buildings would cause a degree of harm to views of heritage assets, that harm is less than substantial and could be justified if sufficient public benefits are delivered.

5.11 As the site is to the south of the Croydon Opportunity Area, it is felt that the building heights should mediate between the heights of the taller buildings to the north, and the lower buildings to the south.

5.12 The heights of the buildings at pre-application stage are not fixed. Although officers are of the view that the impacts on views of heritage assets are acceptable, there are some concerns about coalescence, in particular Blocks A, B and the existing Leon House being of very similar height, so there may be some further alterations to the proposed heights, and the materials and details, to ensure slender elegant towers.

Materials, Elevations and Detailed Design

5.13 The proposed buildings would use brick, which is supported in principle subject to the concerns about visual coalescence being addressed. Some modelling has been proposed to avoid overly blocky forms. There are a number of projecting balconies which officers advise should be removed on street-facing elevations to avoid visual clutter.

Public Realm

- 5.14 The proposal includes a public square adjacent to High Street, including outdoor seating areas for the proposed restaurants. At the upper level (Edridge Road), landscaped communal gardens and playspace for residents are proposed, although they would be shaded by Leon House. There would be new trees along the pavement edge and soft landscaping within the site.
- 5.15 The sunnier corner of High Street and Mason's Avenue is excluded from the site, raising concerns that the result may be piecemeal development which fails to maximise the site's benefits. Re-landscaping that area and the adjacent pavements may be considered beneficial to the public realm, helping to offset the heritage and townscape harm caused by the tall buildings.

Quality and Mix of Accommodation

- 5.16 The proposed unit mix would be as follows:

1 bedroom		2 bedroom		3 bedroom	
120 units	41%	165 units	56%	9 units	3%

- 5.17 Policy DM1 of the Croydon Local Plan expects 20% of units in the site's location to have 3 or more bedrooms, although for developments approved by February 2021 some of that requirement may be substituted by 4-person 2-bedroom units (subject to an absolute minimum 5% 3-bedroom units). The unit mix is therefore subject to change.
- 5.18 The proposed 5 storey block (Block C) would provide dual aspect accommodation as a mix of maisonettes and flats. The towers (Blocks A and B) would include a large number of single aspect units (approximately 35%), and the majority of units would have projecting balconies. Officers have raised concerns that single aspect flats are prone to overheating, lack cross-ventilation, and have limited sunlight and daylight; and that in addition to visual clutter the projecting balconies at the higher levels may be uncomfortably windy and exposed, diminishing their amenity benefits.
- 5.19 A sunlight and daylight assessment has not yet been undertaken, and further information has been requested to explain the impacts on the surrounding neighbours.

The Impact on Adjacent Occupiers

- 5.20 The nearest adjacent residents will be at the Bauhaus / Lennig House on Mason's Avenue, the terraced houses on the opposite side of Edridge Road, and within Leon House which is currently being converted to residential use. There will be no window-to-window overlooking of less than 18m (other than over the public highways).
- 5.21 A sunlight and daylight assessment has not yet been undertaken, and further information has been requested to explain the impacts on the surrounding neighbours.

Highways and Transport

- 5.22 The Council is the highways authority for the adjacent roads. The development would be permit-free, and on-site servicing is being explored.

5.23 The existing undercroft car parking area would be retained in order to provide blue badge parking and cycle parking. This would be provided in accordance with the relevant standards, in addition to limited residents parking. Car club bays would also be provided, with their location still being considered.

Environmental Impact and Sustainability

5.24 A detailed sustainability strategy has not yet been confirmed, but the applicant has been made aware of the requirements for passive design and zero carbon development. Full discussions in relation to air quality, overheating, surface water drainage, micro climate and lighting impacts have yet to be held, but the developer is aware of the relevant policy requirements.

5.25 The site is within Flood Zone 1 (Low Risk) and partially within an area where there is potential for groundwater to occur at the surface. There is an existing basement under parts of the site, but in other areas public realm is proposed and sustainable urban drainage principles are expected to be followed.

5.26 An Environmental Impact Assessment (EIA) Screening Opinion will be carried out on or prior to the submission of a formal planning application.

Efficient Use of Land

5.27 Directly to the north of the site, is another site subject to allocation SA32; 4-20 Edridge Road, which is allocated for residential development at an indicative 180-220 units. Planning permission was previously granted (and expired) for a 23 storey building on that site. To the north east corner of the site there is also a surface car park used by Grosvenor House (not in the applicant's ownership). Whilst the Grosvenor House car park is small and unlikely to deliver a significant quantum of development, its location on Edridge Road is unattractive and it could play an important role in improving the urban design of the street, and the proposal needs to avoid planning blight.

5.28 The applicant has been made aware of the need to discuss their proposal with the adjacent landowners, and to demonstrate that the proposed development would not prejudice the development of nearby sites, result in planning blight, or result in diminished delivery of housing (in particular affordable housing) across all three adjoining sites (or the area as a whole).

Mitigation

At this stage it is envisaged that planning obligations will be required to mitigate the impacts, with the following Heads of Terms:

- Affordable housing (on-site, with a review mechanism)
- Employment and training
- Air quality
- Zero carbon off-setting (if required)
- Car club
- Travel Plan
- Transport for London contributions (if required)
- Highway works
- Public realm works (including paving to High Street outside the site)

6 SPECIFIC FEEDBACK REQUESTED

6.1 In view of the above, it is suggested that members focus on the following issues.

1. The heights of the proposed buildings, including the extent to which similar building heights result in visual coalescence, and whether the proposed heights would maximise efficient use of land and planning benefits.
2. The extent to which the harm to views of heritage assets, and townscape, are justified by the benefits of the proposal, and whether the taller proposed buildings are justified by the commensurate improved affordable housing provision.
3. Whether the proposed public realm and open space benefits delivered by the development are sufficient to mitigate the townscape impacts on High Street, or whether further public realm improvement is required on the corner of Mason's Avenue and High Street in order to offset the townscape harm caused by the scale of Block A.
4. The extent to which adjacent landowners need to work together to ensure that forthcoming schemes are complementary rather than potentially harming each other, in particular with regard to sharing information and demonstrating cumulative impacts on daylight and sunlight; microclimate; and views of heritage assets.
5. Whether the proposed development successfully addresses the Council's vision for the area, in terms of land use, density and public realm.
6. Whether the approach to design, in particular with regard to balconies, materials, quality of accommodation, and public realm is appropriate and responds successfully to the site and its context.

7 PROCEDURAL NOTE

- 7.1 This is the first presentation of the scheme to the Planning Committee. The proposal is reported to Planning Committee to enable Members to view and comment on it prior to submission of a formal application. The proposal is not a planning application. Any comments are provisional and subject to full consideration, including public consultation and notification as part of any subsequent application.
- 7.2 Following the Planning Committee presentation, it is anticipated that the revised design will be re-considered by the PRP before a formal planning application is submitted.
- 7.3 A planning application for the proposed development would be referable to the Mayor of London under the Mayor of London Order 2008. The Mayor's views have not yet been sought, but the applicant has advised of their intention to submit the application to the Greater London Authority's pre-application advice service (including consideration by Transport for London) for an opinion, prior to the submission of a formal planning application.