

1 DETAILS OF THE DEVELOPMENT

Ref: 19/02317/PRE
Location: Part of College Road Car Park Adjacent Croydon College, College Road, Croydon, CR0 1PF
Ward: Fairfield
Description: Erection of part 33 part 48 storey building comprising approximately 836 co-living units (Use Class sui generis) and approx. 120 residential units (Use Class C3), and associated parking, servicing, landscaping and public realm works.
Applicant: Tide Construction Ltd
Agent: HTA Design LLP
Case Officer: Louise Tucker

1.1 This pre-application report aims to provide Members with sufficient information for effective engagement with the scheme, and covers the following points:

- a. Executive summary
- b. Site and surroundings
- c. Proposal
- d. Place Review Panel feedback
- e. Material planning considerations
- f. Specific feedback requested
- g. Procedural matters

2 EXECUTIVE SUMMARY

- 2.1 The proposed scheme is for the erection of a part 33, part 48 storey stepped form tower of modular construction. This would comprise approximately 836 co-living units within the taller tower (Tower A), with associated communal areas and amenity space. Approximately 120 flats are proposed within the shoulder tower (Tower B).
- 2.2 The scheme has developed through a series of pre-application meetings with officers and consideration by the Place Review Panel (PRP) on two occasions. A summary of the Panel's feedback is included within this report.
- 2.3 Discussions so far have focused on the co-living layouts (both for the individual units and the communal spaces they rely on), the height and form of the tower, façade treatment and materials, affordable housing delivery and the important public realm link from College Road up to College Green.
- 2.4 The views of members are sought on the proposals, with particular regard to the following key issues:

Townscape, design and massing

- 2.5 Various options have been considered in terms of height and massing of the towers. It is considered that a scheme of the same height and massing parameters as the 2014 consented scheme (see planning history) is acceptable as a starting point. The applicant proposes to increase the heights of both towers from the former consent (as discussed further below), most significantly to Tower B (the shoulder tower). This would increase the amount of C3 accommodation delivered, and accordingly the amount of affordable accommodation on site given the proposal is for the entirety of Tower B as shared ownership.
- 2.6 Officers have initial concern about the increase in the height of Tower B, due to the potential for coalescence of the cluster of surrounding buildings given the height similarities and close proximity. Discussions surrounding this are ongoing alongside development of the façade treatment and materiality, but Committee Members views are sought as to the height and massing currently proposed in terms of the impact on the townscape and, critically, on the provision of affordable housing (covered below).
- 2.7 Member's opinions are sought on the impact on townscape and in views.



Indicative comparative views between consented and proposed schemes from College Green (note 101 George Street is the building on the left, which is currently under construction)



Indicative view from Wellesley Road (101 George Street on the left)

Affordable housing

- 2.8 An initial viability review is in the process of being independently tested. Initial findings suggest the delivery of a policy compliant 60:40 split between affordable rent and intermediate would not be viable. The scheme currently proposes solely intermediate for Tower B.
- 2.9 The delivery of on-site affordable in a co-living scheme is clearly a positive aspect. Officers are cognoscente of the delicate balance between delivery of affordable housing on site and the townscape impact of Tower B raised above. The views of members are sought on the delivery of affordable housing and the applicant's current proposed offer in terms of tenure (100% shared ownership).

Principle of co-living accommodation

- 2.10 Co-living is a relatively new product that the Croydon Plan is silent on. The starting point for the co-living element of the scheme is compliance with draft policy H18 of the London Plan, which concerns large scale shared living schemes. Discussions so far have focussed particularly on the size and layout of the individual units, and the size, layout and location of communal amenity spaces. Committee Members views are sought on these particular elements.

Public realm

- 2.11 A significant benefit of the scheme is the delivery of the pedestrian route up from College Road to College Green. It is critical that the public realm proposals tie in with the aspirations for the route from East Croydon station through to the cultural quarter, as identified in the Fairfield Master Plan and the College Green aspirations. Consideration of the public realm and the ground floor is underway, in particular the colonnade and ensuring this works as a key route through. Workshops have taken place with the applicant and key adjoining landowners and more are proposed to ensure a co-ordinated approach.

3 BACKGROUND

Site and Surroundings

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



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

Constraints

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

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

- 3.4 The site forms part of the Fairfield Masterplan area. A Primary Shopping Area lies immediately to the north of the site extending west along George Street, which is a classified road. The site has excellent Public Transport Accessibility

(PTAL 6B), being in close proximity to East and West Croydon Stations and numerous bus and tram links.

Planning History

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

- 3.6 06/00854/P - Erection of 29 storey building including 2 basement levels and plant areas at roof level providing a vocational college on the lower 10 floors, a fitness suite and plant area on 10th floor and 173 flats and a crèche on the upper floor; provision of associated parking in basement areas – Permission granted. This permission was not implemented and has now expired.
- 3.7 14/01603/P - Erection of part 16/38 storey building (plus basement and mezzanine levels) comprising 159 residential units, 225 bedroom hotel and restaurant (within use class A3); provision of associated amenity areas, landscaping and car/cycle parking and alterations/partial enclosure of access ramp – Full planning permission granted. Works have commenced on site in pursuance of this permission.

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

- 3.8 16/00944/P - Outline planning permission for demolition and redevelopment to provide: flexible class A1 (shops) and/or class A2 (financial and professional services) and/or class A3 (food and drink); class B1 (business); class C1 (hotel); class C3 (dwelling houses); class D1 (non-residential institutions); class D2 (assembly or leisure); public realm and landscaping; and associated car and cycle parking, servicing, and access arrangements (with all matters reserved); and

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

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

101 George Street (Former Essex House)

- 3.9 17/04201/FUL – Redevelopment of the site to provide a part 38 and part 44 storey building with 546 residential flats, with the ground floor to incorporate a flexible space including retail (Class A1), cafe (Class A3), business space (Class

B1) and gallery space (Class D1) uses with basement accommodating parking spaces, cycle storage and refuse storage, and associated hard and soft landscaping – Permission granted

4 PROPOSAL

- 4.1 The proposed development is for the erection of a part 33, part 48 storey tower of modular construction, with a stepped form. This would comprise approximately 836 co-living units within the taller tower (Tower A), with associated communal areas, amenity space and co-working spaces. A public café and parcel room is proposed at ground floor. Approximately 120 flats are proposed within the shoulder tower (Tower B), with a community use at ground floor and cycle storage at second floor.



5 PLACE REVIEW PANEL (PRP) RESPONSE

5.1 The scheme was presented to PRP on 18th July 2019. With regard to the concept of co-living, the Panel felt that this could work for the site given the accessible town centre location. However given there are very few UK precedents for this housing typology they felt a lot more research was required to present robust justification of appropriate space-standards and design for the individual units, communal spaces and circulation spaces (including of schemes from Europe and the world). The Panel felt it was vital that the building includes a range of high quality shared facilities and enables social interaction between residents for their physical and mental wellbeing, and to mitigate for the small unit sizes. In addition, more specific comments were made as below:

- The layout needs to be distinct from student housing and need to encourage long term occupancy
- Futureproofing should be built into the floor plan to allow internal design to be adapted if required e.g. to merge units to create flats or convert underused communal spaces into flats
- More variety of unit sizes to enable a more mixed community to become established
- Concerns over the single aspect north facing units in terms of daylight and outlook, although impressed by the space efficiency of their layouts
- Robust evidence base required for amount of communal space and Panel not convinced that provided is of sufficient quantum for peak times
- Differing views over location of communal facilities (either on the lowest and highest floors as proposed or spread throughout building) but agreed that separate spaces should be provided
- Consideration of maintenance budgets for amount of communal spaces and that this should not cause rent increases
- Circulation spaces should be generously sized, daylit with seating to encourage incidental interactions

5.2 In terms of design and townscape impact, the Panel opposed any increase in height of Tower B (the shoulder building) from the consented scheme and opposed increasing the footprint. They felt this would create an unduly imposing building and level of coalescence with surrounding tall buildings, with a harm to the townscape and the setting of the Locally Listed Fairfield Halls, and views of the Locally Listed No 1 Croydon from the front of Fairfield Halls. More specific comments were:

- Some increase in height to Tower A could be acceptable subject to testing of modelled options but needs to remain distinct from 101 George Street
- Elevational treatment needs to be of exceptional quality including the articulation and detailing of the top but not convinced by current proposals
- Public realm requires careful consideration to ensure it integrates successfully with the design of the adjoining Cultural Quarter public realm and pedestrian route through to Fairfield Halls

5.3 The following elements were reviewed and amended since the first PRP review:

- Built in flexibility to the floorplan, allowing units to be converted into flats

- Increased corridor widths and circulation space around lifts in particular to aid social interaction
- Further development of the lower floors with incorporation of double height spaces
- Additional investigation of townscape views
- Reduction in height of the shoulder building
- Development of an alternative stepped option in response to concerns regarding the townscape and heritage impact
- Further development of façade treatment/materiality and investigation of ways to better articulate the proposed form and reference to Croydon's mid-century architecture

5.4 The scheme was considered again by the PRP on 19th September. The Panel's report has not yet been produced, but an initial summary of the comments are detailed below:

- The scheme has positively developed since the first PRP session
- Differing views over the location and amount of communal space, with an acknowledgement of the management issues of having communal amenity distributed throughout the building, and operator preferences for having consolidated communal areas on lowest and highest floors. Positive strides in terms of types of uses, variety of amenity areas and built in futureproofing
- A social anthropologist or behavioural specialist should inform these discussions in terms of co-living
- Fire safety requirements for the co-living element need to be considered at this stage
- Ground floor colonnade needs work to ensure this is an open and visually accessible route
- Development of façade and terracotta materiality should continue in a positive direction, including differentiation from 101 George Street and taking inspiration from arts and crafts and ceramics to further reinforce the 'Croydon' identity
- Consideration of access, delivery and servicing requirements for this type of scheme

5.5 The scheme is continuing to develop at pace since the PRP. A number of changes have been made including an increase in height to the colonnade and materiality to the lower parts of the building.

6 MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the application that the committee must consider are:

- Principle of the uses
- Affordable housing
- Townscape and design
- Amenities of future occupiers
- Amenities of adjoining occupiers
- Transport

- Other considerations including S106 obligations

Principle of the uses

Site allocation

- 6.2 The site is located within the Edge Area of the Croydon Opportunity Area covered by policy DM38.4 of the Croydon Local Plan (CLP) (2018), where tall buildings can be acceptable subject to achieving a high quality form, design and treatment and where negative impact on sensitive locations is limited. Additionally, the principle of a tall building on the site has been established with the grant of planning permission for the part hotel/residential scheme in 2014 (see planning history – application reference 14/01603/P).
- 6.3 The site is allocated (site 31) in the CLP (2018) for “*mixed use redevelopment comprising hotel and residential*”, with a projected 159 homes on site. The justification for the option is as follows:

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

- 6.4 The proposed scheme does not meet this allocation. However it should be noted that the allocation of the site through the Local Plan process (in terms of use and unit numbers) related to the 2014 planning consent. The scheme would provide a mixed use redevelopment by providing both co-living (sui-generis use), traditional residential accommodation (C3 use) as well as community and commercial uses at ground floor. There is no current policy which sets out how co-living accommodation should be assessed by LPAs in terms of its contribution to housing targets, compared with a traditional residential offer.

Co-living accommodation

- 6.5 To be clear, co-living is a sui-generis use and not traditional C3 residential. In terms of the principle of co-living on the site, policy SP2.7 of the CLP (2018) seeks to ensure that a choice of homes is available in the Borough that will address the need for homes of different sizes. Emerging policy H18 of the draft New London Plan concerns large-scale purpose-built shared living developments, and requires them to meet the following criteria:
- 1) it is of good quality and design
 - 1A) it contributes towards mixed and inclusive neighbourhoods
 - 2) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency
 - 3) it is under single management
 - 4) its units are all for rent with minimum tenancy lengths of no less than three months

- 5) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) convenient access to a communal kitchen
 - b) outside communal amenity space (roof terrace and/or garden)
 - c) internal communal amenity space (dining rooms, lounges)
 - d) laundry and drying facilities
 - e) a concierge
 - f) bedding and linen changing and/or room cleaning services
- 6) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes
- 7) a management plan is provided with the application
- 8) it delivers a cash in lieu contribution towards conventional C3 affordable housing

6.6 Whilst there is no mechanism currently to calculate the contribution of co-living units to housing targets, the existence of draft policy H18 (alongside CLP policy SP2.7) makes clear that shared living developments can have a role in meeting London's housing need. The site is in a central location with excellent access to public transport, where high density residential development is appropriate (which is supported by the site allocation and planning history).

6.7 Officers are currently of the view that subject to the above criteria being met and robust consideration of the other material issues, the scheme provision of co-living units and 120 residential units would largely comply with the site allocation; the 836 co-living units, whilst not C3 in use class, would on balance make up for the shortfall of 39 C3 units required by the allocation.

Loss of College car park

6.8 As part of the former application (ref. 14/01603/P) the car park was considered to be ancillary to the educational use of the College and therefore a 'community use', protected by policy. Its loss to accommodate the development was justified through a demonstration by the College that the car park was no longer required, and the sale of the car park would partly fund a planned expansion of the College's further education provision.

6.9 Current policy DM19.1 of the CLP (2018) protects community facilities, with their loss permitted where it can be demonstrated there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community. It is noted that the ownership of the land has formally changed since the previous application, and development has commenced on site in pursuance of the planning permission. The applicant has been made aware they will need to address this policy requirement as part of any future planning application, but it must be noted that the site as it sits today is not a car park associated with the College.

Design and townscape

Height and massing

- 6.10 A scheme within the height and massing parameters (part 16/38 storeys) of the previous planning consent is clearly acceptable. Indicative massing is shown below:



Indicative comparative views between consented (left) and proposed (right) schemes from College Green (note 101 George Street is the building on the left, which is currently under construction)

- 6.11 The proposed scheme would increase the height of Tower A to 48 storeys, and the height of Tower B to 33 storeys. It is worth noting that the modular construction methods proposed allow depth efficiencies, and therefore each storey is shorter in height than a typical build-up. Whilst officers consider that the height increase to Tower A could be acceptable to differentiate from the neighbouring scheme at 101 George Street, officers do have some concern with the increase in the height of Tower B in townscape terms. There are concerns that the tower will start to coalesce with surrounding buildings, given the heights and close proximities between the sites, in particular in views from Queens Gardens and in front of Fairfield Halls (see images above).
- 6.12 It is considered that the cluster of buildings could appear as an overly dominant mass in both mid and long range views, as opposed to the lower shoulder height which would allow for spacing and views through. Member's views are sought.



Indicative view from Addiscombe Grove (101 George St is the building to the right with the increased height to the Fairfield Homes tower shown on the left)

- 6.13 Balancing the impact of the additional height alongside an increased provision of affordable C3 accommodation is clearly an important exercise; Member's views are sought as to whether the height of Tower B is justified on the basis of the quantum and tenure of affordable housing delivery.

Design approaches and façade treatments

- 6.14 The design approach is focussed on incorporating the Croydon context and mid-century heritage which is supported in principle. Officers are working with the applicant to ensure this is articulated robustly on the façade both in form and materiality, and is distinct from surrounding design approaches to give the building its own identity within this cluster. This includes exploring ways to emphasise slenderness and give the two towers a separate identity, and exploring horizontal/vertical expression across the elevations. Whilst this is under development, current working examples are looking successful.





- 6.15 Officers have stressed the importance of articulating the geometry of the elevations and expressing the angles of the side elevations. Given the large scale of the building the detailing needs to be successful on both a micro and macro scale to relate to the Croydon context and express the depth and angles.

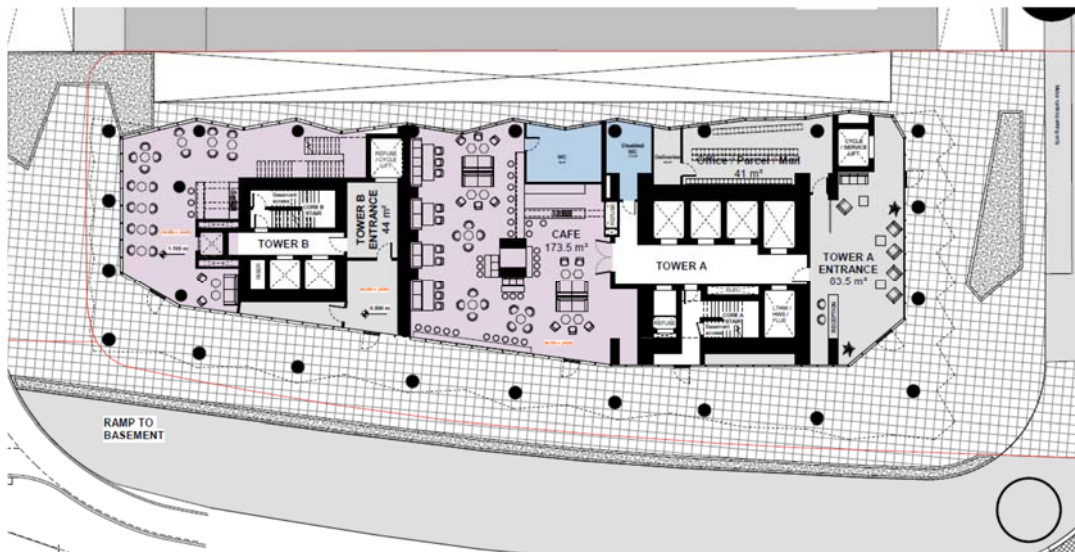
Public realm

- 6.16 Officers have made clear that it is critical for the aspirations of the Fairfield Masterplan and College Green for a high quality pedestrian link between East Croydon Station and College Green is delivered. It must introduce active frontage on the eastern elevation. The design and layout of the public realm is challenging, but must link in with the forthcoming schemes on adjacent sites to the north, east and south, particularly in achieving a level pedestrian access and managing the land level change and junctures between sites. Officers are facilitating discussions with adjoining landowners to ensure a coordinated approach, as well as ensuring a close integration with the winning proposal for College Green.
- 6.17 The route would be provided through a colonnade, as was proposed through the 2014 consent, hence establishing this is an acceptable approach. The applicant has been progressing this positively; initial concerns were raised regarding the width and visual accessibility of the colonnade, which are beginning to be addressed. Discussions are ongoing, particularly around wind and microclimate.



Indicative view of the colonnade and route up to College Green (101 George St is on the right)

- 6.18 Alongside this officers are encouraging the proposed ground floor uses (most relevant in Tower B) to complement and signal entry into the Cultural Quarter, with the incorporation of a community/cultural space on the corner. The applicant has been requested to investigate potential occupiers for this space from an early stage.



Indicative proposed ground floor layout

Affordable housing

- 6.19 As per CLP policies SP2.4 and SP2.5, for traditional residential accommodation the Council will negotiate to achieve up to 50% affordable housing subject to viability, and will seek to achieve a 60:40 ratio between affordable rented homes and intermediate homes.
- 6.20 In terms of co-living, draft policy H18 of the London Plan requires co-living accommodation to deliver a cash in lieu contribution towards conventional C3 affordable housing. The policy directs that this should be sought either as an

upfront cash in lieu payment to the LPA, or by way of an in perpetuity annual payment to the LPA. In both cases the contribution provided is expected to be the equivalent of 35% of the units (to be provided at a discount of 50% of the market rent).

- 6.21 Officers consider that a mixed co-living/residential scheme should deliver traditional affordable residential accommodation on site in line with policy SP2 of the CLP (2018), as opposed to a cash in lieu payment for a wholly co-living scheme. However this needs to be robustly tested against the emerging London Plan requirements for co-living accommodation. Officers have stressed that the expectation is that this should be provided as policy compliant in terms of amount and tenure split.
- 6.22 The applicant is currently offering the entirety of Tower B as affordable C3 accommodation (approximately 120 units). A high level viability appraisal has been undertaken and is currently being independently assessed. The scenario assessed within the appraisal assumes 833 co-living units in a 48 storey Tower A and 120 affordable housing flats in a 33 storey Tower B, with the entirety of the latter being affordable. This provision would equate to 30.18% by habitable room, albeit assumed to be entirely of an intermediate tenure with no provision for affordable rented homes.
- 6.23 The financial viability of the proposed development is still being independently scrutinised. Officers have requested additional scenario testing specific to the requirements for co-living set out in the draft policy H18 of the LP.
- 6.24 As discussed above, officers have raised some concern in terms of the townscape impact of Tower B at 33 storeys high. Reducing the height of Tower B will impact on the amount of affordable housing which could be provided. Views of committee members relating to the townscape impact are therefore sought, along with views on the current affordable housing offer.
- 6.25 Officers are working with the applicant to discuss this further and are engaging with the GLA on this matter.

Quality of co-living accommodation (Tower A)

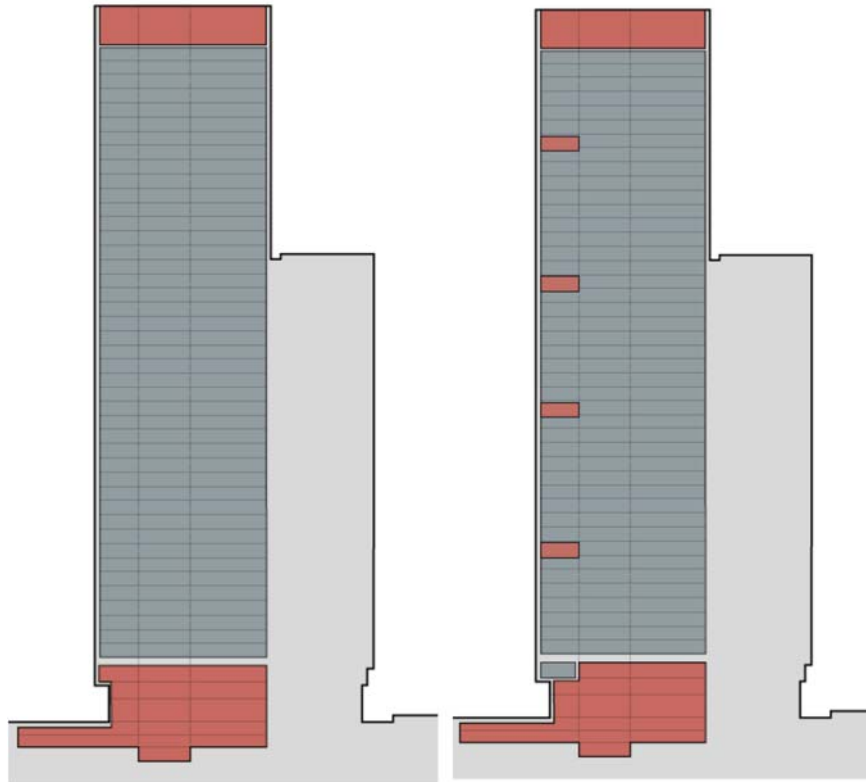
- 6.26 Co-living is a sui-generis use and therefore not required to meet the minimum floorspace standards as required for traditional C3 homes. As a starting point, emerging policy H18 of the draft LP provides specific requirements for this type of accommodation. Key to this in differing to traditional residential accommodation is that whilst units must provide adequate and functional living space and layout, they must also demonstrably not be self-contained homes nor be capable of being used as such. The GLA have confirmed that in reality this means the unit size they expect would be between 20-30sqm floorspace, but no higher.
- 6.27 Research undertaken by the applicant suggests that rooms within other operating co-living schemes are too small, with rooms more comparable in terms of size and quality to student accommodation and tenancies generally short term as a result. This development has sought to address this by providing 4 different

types of larger studio rooms, with a current average unit area of approximately 25.3sqm. This can be compared with other co-living schemes in operation, for example the Collective scheme in Old Oak which has typical room sizes of 17.9sqm. Comparison can also be made to the minimum floorspace requirements for a studio unit, which would be 37sqm as per the Nationally Described Space Standards. Generally officers consider the proposed unit sizes appropriate in being functional but not capable of being a self-contained home. Officers have stressed the importance of research and metrics for other co-living schemes to provide a convincing justification that the proposed layout is acceptable.



Indicative layout of a typical floor in Tower A (on the right) and B (on the left)

- 6.28 The second critical element is the quality and the arrangement of the communal areas in the scheme, which is a key part of policy H18. Generally other schemes in operation or consented have a kitchen for residents on each floor of the building. Research carried out by the applicant in dialogue with operators suggests that there are significant maintenance issues with this approach in such large buildings. The research suggest this leads to limited use by residents as a result, where residents prefer to use the larger and better quality operator maintained spaces on the lowest and highest floors.
- 6.29 The co-living layouts are developing positively. Officers are of the view that the principle of having the largest communal areas, including the shared kitchens, on the highest and lowest floors could be supported. Alongside this it is considered that communal areas should also be dispersed at intervals throughout, to provide quieter and more personal spaces through the building and facilitate residents to create communities with their adjacent neighbours. The appropriate number of dispersed spaces throughout the building is yet to be agreed, but officers are of the view the 2,247sqm at top on bottom is required as a base minimum with dispersed in addition. Member's views are sought on this aspect.



*Left – communal space at top and bottom
(offering 2,247sqm of shared amenity)*

*Right – communal space a top, bottom and
dispersed (offering 2,119sqm)*

6.30 Officers are exploring with the applicant how flexibility can be incorporated into the floor plan, for example communal areas throughout the building (if underused) potentially being converted into bedrooms, or one bedroom units converted into sharing units if there is demand. Larger units could encourage occupation by a wider variety of residents on a longer term basis which is supported.



Indicative first floor layout of amenity space

- 6.31 Discussions with the applicant are ongoing to achieve an overall offer of communal space for residents which strikes the balance between management and maintenance pressures for the future operator, whilst ensuring there are enough communal areas in convenient proximity to all units (and facilitating socialising and community engagement of residents on individual floors). This includes analysis of other co-living schemes and resident preferences/behaviour, and working towards a range of different spaces (e.g. co-working spaces, gym, library, café and laundry areas) where the layout and design of spaces (both internal and external) is high quality and critically, is able to accommodate a variety of residents/users.
- 6.32 Concerns have been raised regarding the single aspect north facing units, in terms of daylight/sunlight and outlook given the size of the units and proximity to 101 George Street. Detailed analysis of the daylight/sunlight impacts are yet to take place, but officers have requested the applicant consider options to mitigate this in a meaningful way to ensure the living conditions for these units are high quality for occupiers, for example working with fenestration and increasing the depth of the 'pleat' in the façade as much as possible within the relatively constrained footprint.
- 6.33 Officers have been in dialogue with our Building Control team in relation to the number of units (and people) per core and what the potential fire safety strategy would be. They have raised concern about the number of co-living units per core (19 at its maximum) and we have challenged the applicant to evidence how this is acceptable and can be made to work. Whilst not strictly a planning matter, this is an important aspect that officers want comfort on, certainly before any planning application is determined.

Quality and mix of C3 residential accommodation (Tower B)

- 6.34 Each typical floor comprises a 1b1p, 1b2p, 2b3p and a 3b4p unit. Policy DM1 of the Croydon Local Plan expects a minimum of 20% of traditional residential units in the site's location to have 3 or more bedrooms. For development approved by February 2021 some of the requirement may be substituted by 2 bedroom 4 person units (subject to an absolute minimum of 5% 3-bedroom units). Currently 25% of the C3 units are for family occupation.
- 6.35 The units would be dual aspect. Discussions regarding provision of private and communal amenity space for all the units is ongoing, as part of consideration of the façade treatment and stepped top of Tower B. It is likely oversized units will be provided as opposed to balconies. A daylight and sunlight assessment has not yet been undertaken, but this has been requested to understand the impact of emerging/consented schemes to the south and east of the site on the quality of these units.

Impact on adjoining occupiers

- 6.36 There are a number of buildings surrounding the site, along with a number of planning consents granted (and schemes coming forward) in close proximity. A daylight and sunlight assessment has not yet been provided, but the applicant

has been made aware that the development will need to take full account of surrounding development, both current and emerging.

Highways and transport

- 6.37 11 disabled parking spaces are proposed at basement level (under Tower A), with the remainder of the development car free given the highly accessible location. These spaces would be accessed via the ramp from College Road (extending partially under the College) similarly to the extant scheme, with exact arrangements to be agreed to ensure this works with the land level changes. Refuse collection and storage for both towers would also be contained within the basement, along with cycle storage for the co-living residents. Cycle storage for Tower B is currently proposed at second floor level.
- 6.38 Consideration is being given to the likely transport and access impacts which are specific to a mixed co-living/residential scheme of this size, with public uses on the ground floors. The public realm will need to work hard with this and cumulative schemes coming forward and there will be a need for TfL contributions given the reliance on East Croydon rail and tram.
- 6.39 There is likely to be a high demand for deliveries and servicing in and around the building, separate refuse and recycling collection arrangements and high numbers of resident and visitor cyclists. Use and site specific analysis with proposed mitigation has been requested from the applicant.
- 6.40 Restriction of car parking permits for future occupiers would be secured by legal agreement.

Environmental impact and sustainability

- 6.41 A detailed sustainability strategy has not yet been confirmed, but the applicant has been made aware of the relevant policy requirements, including for passive design and zero carbon development. Full discussions relating to air quality, overheating, surface water drainage, microclimate and lighting impacts are yet to be held.
- 6.42 The site is within Flood Zone 1 (low risk) and an area of surface water flood risk. There is limited potential for groundwater flooding to occur. The applicant has been advised that a full flood risk assessment and drainage strategy would be required to support a planning application. Green field run-off discharge rates are the policy requirement.
- 6.43 An Environmental Impact Assessment Screening Opinion will be carried out prior to the submission of a formal planning application.

Mitigation

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

- Affordable housing (including early and late stage review)
- Employment and training (contributions and obligations)
- Air Quality
- Zero carbon offset (if required)
- Car club provision and membership
- Travel Plan
- Transport for London contributions (if required)
- Contribution to cycling proposals in town centre
- Car parking permit restrictions
- TV signal mitigation
- Wind mitigation
- Public realm delivery and maintenance
- Highway works

7 SPECIFIC FEEDBACK REQUESTED

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

1. The heights of both Towers A and B including the impact of a potential increase in height from the extant consent, particularly of Tower B, on the townscape and views
2. The current affordable housing offer (all units within Tower B), and whether there is scope to justify the height of Tower B for provision of C3 affordable housing
3. The standard of both the co-living and residential accommodation, in terms of quantum, layout, range, light, outlook and privacy including the communal amenity spaces
4. The proposed design approach to the façade and initial elevation details including materiality
5. The colonnade and public realm proposals linked into the aspirations of the Fair Field Masterplan and College Green
6. The level of car parking proposed, as well as the level and location of cycle parking (with shared facilities proposed for the co-living units) and pedestrian demand

8 PROCEDURAL NOTE

8.1 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.

- 8.2 A planning application for the proposed development would be referable to the Mayor of London under the Mayor of London Order 2008.
- 8.3 The applicant has submitted a pre-application to the Greater London Authority (including consideration by Transport for London) for an opinion. A meeting was held on 19th September. Whilst supportive of the principle, their main feedback focussed on the quality of communal space provided for the co-living units and the amount of affordable housing to be delivered by the scheme.