

**1 DETAILS OF THE DEVELOPMENT**

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

**2 PROCEDURAL NOTE**

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

**3 EXECUTIVE SUMMARY**

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

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

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

Townscape, design and massing

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

Affordable housing

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

Principle of co-living accommodation

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

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

#### Trees and public realm

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

## **4 BACKGROUND**

### **Site and Surroundings**

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



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

### **Constraints**

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

### **Planning History**

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

Citylink and Tolley House – 2-4 Addiscombe Road:

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

Land adjacent to Croydon College, College Road:

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

### Proposal

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



Image 3: proposed ground floor plan



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



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



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

## 5 PLACE REVIEW PANEL (PRP) RESPONSE

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

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

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

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

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

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

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

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

## 6 MATERIAL PLANNING CONSIDERATIONS

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

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

### Principle of the uses

#### Site designations

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

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

#### Co-living accommodation

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

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

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

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

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



Image 7: flexible C3 plan

#### Education facilities

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

#### **Design and townscape**

##### Height and massing

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



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

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



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



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



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

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

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

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

#### Design approaches and façade treatments

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

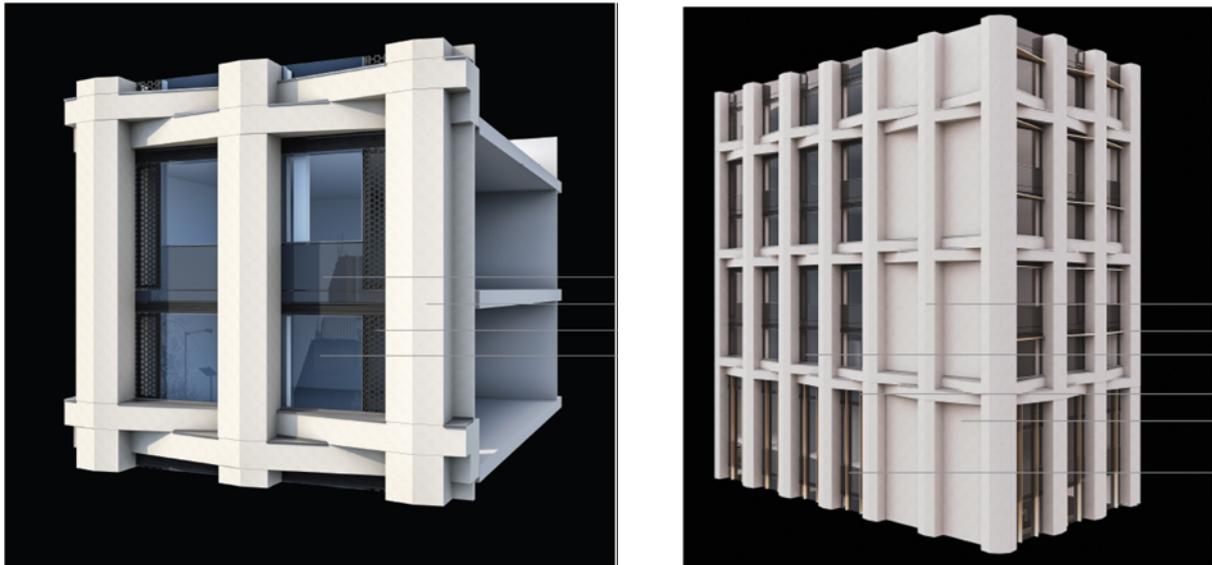


Image 10: Developing bay studies of the façade

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

#### Materiality

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

#### Public realm

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



Image 11: proposed block plan

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

### Trees

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

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

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

### **Affordable housing**

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

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

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

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

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

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

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

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

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

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

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

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

### **Highways and transport**

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

## **Environmental impact and sustainability**

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

## **Mitigation**

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

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

## **7 SPECIFIC FEEDBACK REQUESTED**

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

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

## **8 PROCEDURAL NOTE**

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