

1. DETAILS OF THE DEVELOPMENT

Ref: 20/03799/PRE
Location: Zodiac Court, London Road, 161-183 London Road, Croydon, CR0 2RJ
Ward: Broad Green
Description: Phased redevelopment of the current site to provide residential and commercial development
Applicant: Mitheridge Capital Management LLP
Agent: Avison Young
Case Officer: James White

2. PROCEDURAL NOTE

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

3. EXECUTIVE SUMMARY

- 3.1 The scheme has so far been developed through a number of pre-application meetings with officers. It was considered by the Place Review Panel (PRP) in

May 2021. The print deadlines mean that a summary of the Panel's feedback will be included within the addendum.

- 3.2 Currently this pre-application proposes a redevelopment split into 2 phases. Both phases involve demolition of buildings and the provision of commercial and residential units, as well as parking for both within an extended basement area. This development would continue the redevelopment of the site that is planned through recently approved and pending applications for the conversion of existing office space (approved) and alterations to the elevations (pending).
- 3.3 It is planned that a single, hybrid (full and outline elements), planning application will be submitted to cover the whole site.

4. SITE BRIEFING

4.1 The whole area covers 161-183 London Road (see map below). The site comprises a rectangular plot of land (measuring 0.675ha) and encompasses an existing modernist mixed use development made up of the following component parts;

- 161 London Road – 3/4 storey vacant office block that wraps around Zodiac House and is known as Zodiac Court, including a ground floor commercial unit, currently in use as a restaurant.
- 163 London Road – commercial unit, currently vacant to the south of the gate entrance to Zodiac Court.
- 165 London Road – central residential tower, known as Zodiac House.
- 167 London Road – ground floor commercial unit to the north of the gate entrance to Zodiac Court.
- 169 London Road – vacant 2 storey nightclub space to the north of the site.
- 171-183 London Road – 7 commercial units (some vacant) on the London Road frontage towards the north of the site.
- The land slopes downwards from London Road to Cavendish Road, creating a basement area where there are 150 car parking spaces.
- The site is serviced by numerous vehicle access points off London Road and Cavendish Road.
- There is limited vegetation within the site, whilst there are a number of street trees in place on London Road.

Image 1: Existing site



Image 2: Site area (hatched)



- 4.2 The applicant owns the part of the site that includes the former office building, the former car showroom, the existing residential tower, and the majority of the car park (red area in the above image). The applicant has an option to acquire the rest of the site (blue edge), which includes the Cinatra's nightclub.

Site Designations

Image 3: designations and allocation from CLP 2018



337: Zodiac Court, 161-183 London Road

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Broad Green & Selhurst	CR0 2RJ	0.71ha	Residential building with ground floor commercial units	Urban	High	Large buildings with well defined building line and adjacent to other buildings; Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Residential redevelopment		Redevelopment provides an opportunity to intensify the use of the site. However, it is noted that there are significant issues with viability of redevelopment that will need to be overcome before this site could be developed. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	32 to 184

- Archaeological Priority Zone
- Proposal Site 337 (see above)
- DM36 Broad Green and Selhurst
- Public Transport Accessibility Level (PTAL) 6a
- The site is within the Controlled Parking Zone North which is operational Mon-Sat 9am-5pm and this part of London Road is subject to yellow lines
- London Road is a classified road, A235 and part of the strategic road network but not a red route
- Area at risk from surface/ground water flooding.
- Vicinity of a Neighbourhood Centre

Surrounding Area

North East

3/4 storey mansion buildings with retail on the ground floor.

Local Heritage Area

Shopping Parade

South East

At the junction of London Road/Chatfield Road there is a parking area connected to a car business on London Road.

This parcel of land is also covered by a place specific policy area – DM38 and a proposal site allocation DM36 - 396

The remainder of Chatfield Road comprises 2 storey residential houses.

500m to the south-east is West Croydon railway station.

South West

2 storey residential houses

North West

2/3 storey residential property (recently converted from office space)

Vistec House (6-9 storey, including basement) – large House in Multiple Occupation (HMO) currently under construction.

Relevant Planning History

- 4.3 17/02708/GPDO - Use as 115 flats. **Approved** 21.07.2017. This has not been implemented.
- 4.4 20/04014/GPDO - Use as 76 dwellings. **Approved.** 10.10.2020.
- 4.5 21/01093/NMA - Amendment to approval 20/04014/GPDO (reduce numbers by 6 and changes to internal layout). **Approved.** 25.03.2021.
- 4.6 21/01030/FUL - Alterations; replacement of timber cladding, window systems and balcony guarding and associated works (to the existing tower). **Pending Consideration.**
- 4.7 20/06149/FUL - Part change of use from office (E(g)) and nightclub (sui generis) to residential (C3) to create 3 flats, demolition of external structures, formation of entrance ramp and stairs, alterations to elevations to an existing building and associated works. **Pending Consideration.**
- 4.8 The image below shows the visual representation of the combined applications that are currently under consideration.

Image 4: visual representation



Neighbouring site history

Praise House, 145 - 151 London Road

- 4.9 17/02181/FUL - Demolition of the existing buildings and the erection of a mixed use development comprising 72 flats of up to 9 storeys in height and a community use (D1) and one retail unit (A3) on the ground floor with associated parking, servicing and landscaping. Permission Granted 04/05/18.

Image 5: Views showing corner of London Road and Chatfield Road with 17/02181/FUL permission



Vistec House – 185 London Road

- 4.10 15/02834/GPDO – Prior Approval (office to residential accommodation) for Use as 62 flats. **Approved** 03/08/2015
- 4.11 16/03542/GPDO – Prior Approval (office to residential accommodation) for Use as 95 flats. **Approved** 12/09/2016
- 4.12 16/03847/P – Replacement of external surfaces of the existing building to provide balconies to the front elevation and replacement of all windows; excavation to the front of the building to provide lightwell to lower ground floor. **Permission Granted** 03/10/2016
- 4.13 16/05414/FUL – Granted planning permission for erection of roof extension and nine storey rear extension to provide additional accommodation in the form of one House in Multiple Occupation ('Super' HMO) totalling 90 letting rooms. Alterations to the existing building to provide fenestration changes and balconies for residential use; Excavation to the front of the property to provide light well and access to lower ground floor. Provision of associated parking, and cycle store and bin store to rear. **Permission Granted** 08/02/17
- 4.14 18/00560/NMA – Non-material amendment to 16/03542/GPDO for the following;
- Minor changes to unit shapes/layouts throughout.
 - Re-designed arrangement of central staircase/lift area and associated corridor across all floors.
 - Provision of service corridor alongside central staircase at lower ground floor level.
 - Revised arrangement of corridor/entrance lobby/adjacent units at ground floor level.
 - Provision of shared laundry facilities for self-contained units.
- Approved** 07/03/2018
- 4.15 18/02935/NMA - Non-material amendment to 16/03542/GPDO for the following;
- The proposal is to change the mix of the proposed bedsits. These would result in an increase of 90 (double occupancy) bedsits to 149 (single occupancy) bedsits. This would be achieved through altering the floor layout of the rooms for single occupancy use rather than double

occupancy use. The applicant advises that the change would lead to a *reduction* in the total number of residents from 180 persons to 149 persons. The applicant considers it would be a non-material amendment to the approved scheme as a consequence.

- The applicant advises the amendment to the accommodation mix is a response to HMO market needs for single occupancy rooms.
- The proposal would also result in additional balconies being formed.
- The proposal would also result in changes to the layout (reduction of floorspace) of 5 units of Prior Approval Scheme (Ref: 16/03542/GPDO and 18/00560/NMA).

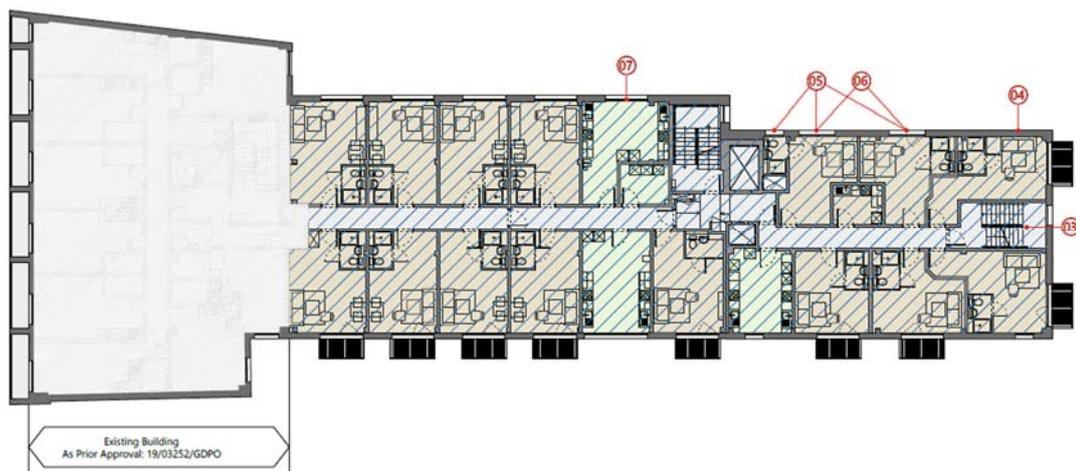
Not Approved 12/07/2018

4.16 19/03252/GPDO - Use of lower ground floor, part ground floor, and floors one to five as 79 studio apartments (C3 residential Use Class). **Approved** 14/08/2019

4.17 19/04642/NMA - Non-Material Amendment to Planning Permission 16/05414/FUL for Erection of roof extension and nine storey rear extension to provide additional accommodation in the form of one House in Multiple Occupation ('Super' HMO) totalling 90 letting rooms. Alterations to the existing building to provide fenestration changes and balconies for residential use, Excavation to the front of the property to provide light well and access to lower ground floor. Provision of associated parking, and cycle store and bin store to rear. **Approved** 16/10/2019

A number of changes were proposed which effectively regularise the necessary layout changes that occurred as a result of prior approvals granted subsequent to the issue of planning permission.

Image 6: Typical floor layout – 4th floor



14 Cavendish Road

4.18 There is extensive planning history on this site with a variety of permission and approvals to convert buildings into residential occupancy. The buildings are now known as: Warehouse 14 Cavendish Road; Urban House 14a Cavendish Road; Khyan House 14b Cavendish Road and Veyron House 14c Cavendish Road

Proposal

4.19 It is proposed that a single hybrid (part full and part outline) planning application will be submitted, currently as follows:

Full element (1st phase);

- Demolish the forecourt structure at 161 London road, along with 169 London road
- New retail unit fronting onto London Road with associated roof-top amenity space;
- New residential block on the corner of London Road and Cavendish Road to comprise c. 17 units;
- New public realm to London Road, Cavendish Road and Chatfield Road.
- This phase would require an interim servicing arrangement for the retail and residential units as the final solution utilises part of the site in the second phase.

Outline element (2nd phase)

- Demolition and redevelopment of 171-183 London Road (including Cinatra's nightclub)
- New basement car park / service area / access for phase 2
- New retail unit fronting onto London Road
- New rooftop amenity space
- New residential block comprising c. 92 units
- New public realm to London Road.

4.20 The current unit mix would be as follows;

Unit type	Mix		
	Phase 1	Phase 2	Overall
1	N/A	40 (43%)	40 (37%)
2	11 (65%)	44(48%)	55 (50%)
3	6 (35%)	8 (9%)	14 (13%)
Total units	17	92	109

Further option

- Depending on the affordable housing route taken the scheme may include the 70 prior approval office to residential permitted development (PD) units (see 21/01093/NMA in the history section above). The possible Affordable Housing options are addressed in the report below).

Image 7: visual of current scheme (Phases 1 and 2)



5. PLACE REVIEW PANEL FEEDBACK

5.1 The scheme was presented to the Council's Place Review Panel on 20th May 2021. Due to print deadlines it is not possible to include the Panel's main comments in this report, but these will be provided as an addendum.

6. SUMMARY OF MATTERS FOR CONSIDERATION

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

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

Principle of Development

6.3 The existing allocation in the Croydon Local Plan 2018 is for a residential development, proposal site number 337, with an indication of 32-184 units on the site. The principle of a residential land use is therefore acceptable. It should be noted that the allocation also states that there are significant viability issues with redevelopment that will need to be overcome.

- 6.4 As the site is an edge of centre location and the allocation is solely for a residential development, the inclusion of Class E(a) (formerly A1) floorspace is not required and a solely residential scheme could be supported from a policy position. However, it is appreciated that there are existing commercial uses on site and they help to provide a more active frontage and assist with viability.
- 6.5 The current scheme proposes more commercial floor space than the existing arrangement and could therefore only be supported if it passes a sequential test (and impact assessment). A sequentially preferable site is one within a town centre or an existing vacant unit in an edge of centre location, which is both suitable and available.
- 6.6 The site is also within the vicinity of a Neighbourhood Centre, as such development proposals for Class E (a-c and g) and community facilities (Class F) (which cover that proposed) should be of a reasonable scale, proportionate to serve a neighbourhood need and have a clear relationship to other facilities within the centre. These uses are also acceptable in principle in the vicinity of Neighbourhood Centres with a limit of floor space of 280m² (net), located within a five or ten minute walk from the centre, having a clear visual relationship to the centre and not disconnected from the centre by physical barriers. As all the retail units are over 280m² then a sequential test is still needed.
- 6.7 Any scheme should (which would include all phases) not have more than one medium sized speculative convenience retailer as there is real concern at the risk of long term voids. It is understood that the applicant has a tenant for one of the stores, which is welcomed, but evidence to demonstrate this would be needed at application stage.

Design, Townscape & Heritage

Massing

General

- 6.8 Croydon Local Plan 2018 states that a tall building is a building that is 6-storeys (25 metres) or which is significantly taller than its surrounding buildings.
- 6.9 The development plan contains a plan-led approach to guiding the location of new tall buildings, which in the case of Croydon would be within the OAPF, central or edge area. Strictly speaking as the proposed development, which includes two taller elements, would be a departure from the plan as it sits outside the northern edge of the OAPF and its tall building Edge Area. Given the scale of the existing Zodiac tower block and other blocks towards the Broad Green centre additional development at a similar scale could be deemed acceptable in principle (subject to satisfying other relevant matters like micro-climate and daylight/sunlight). However, given that these developments are significantly taller than the more residential scale of the surrounding streets and Local Heritage Area (LHA) parade the proposals still need to use design interventions at various scales to bridge the transition in scales from the predominant 2-4 storey heights, through the mid-range heights to the taller elements proposed.
- 6.10 To justify their acceptability an 'exceptional' quality is required. Initial microclimate information is very limited but suggests that similar developments

that have gone through wind testing have provided comfortable conditions for the intended purposes around the building. In terms of daylight/sunlight, early information suggests that there will be impacts upon the surrounding context, but the detail is not known. More information (including long contextual sections) has been requested to give a clearer picture of key potential impacts in order to judge the suitability of the proposals before they are developed further.

Corner Block

Image 8: the corner of London Road/Chatfield Road



6.11 The placement and height of the front corner block seeks to act as a transition in scale and frontage. The block steps back from the building line of Praise House and sits in between the 3 (plus roof) storey parade and 5 storey element of the consented Praise house and, the taller scale of Zodiac Court, the proposed rear block and the taller blocks nearer Broad Green's centre. Officers are not convinced this is successful after an initial review, particularly as the most recent version for Committee (below right) sees an increase in foot print and height making the tower more bulky than when officers reviewed the scheme in VuCity. This adds to officer's concern regarding its impact and that in its current form and height the tower may be too imposing and would have an adverse impact on the Local Heritage Area and the London Road townscape and pedestrian experience. Additional information including sections and views exploring this relationship have been requested as a result and further discussions, design development and an updated VuCity model will be required.

Rear Block

6.12 The rear block has been substantially brought down in height during pre-application discussions (initially podium+21 storeys and now podium+12 storeys) and so from long range views it is far less dominant. Its east-west orientation means it remains of relatively low visual impact to the heritage assets (as they are to the east and north-east on the slenderer elevation). However, from the Broad Green centre, shown in the view below, it still has a significant impact upon the skyline above the existing mid-rise development around the centre of Broad

Green. The right hand corner of the form as seen from the Broad Green intersection is particularly prominent. The applicant has sought to reduce the visual impact by breaking up the form into three distinct segments as well as reducing the parapet height in the centre and expressing the lift core to break-up the roof line. This appears to have helped but will need further testing through refinement of the architectural language

Image 9: view from Broad Green looking south



Heritage

6.13 The main heritage asset affected by these proposals is the London Road Local Heritage Area (LHA) facing the site. This is a group of shopping parades dating from 1902 with a distinctive Arts and Crafts influenced architectural character and called the Royal Mansions. The existing open forecourt of the Zodiac site and the scale of the buildings behind do not complement the LHA and detract somewhat from its setting. There is an opportunity for the proposals to create a building frontage more in keeping with the scale and form of the LHA. However, officers are concerned that the current proposal would not achieve an improvement given the inconsistent building line and height on the London Road frontage

Image 10: map and photos of LHA



6.14 An earlier version of the scheme was arguably more successful in this regard; however this was not progressed further due to other deficiencies within the

scheme including the far greater height of the rear block, lack of shared amenity provision on the roof deck and minimal public realm at ground level. Officers are particularly concerned that the corner tower would have a harmful impact on the LHA given its scale and prominence in the street scene. The applicant will need to illustrate the townscape impacts in more detail, focussing on close range street views around the site to fully convey the potential impact

Image 11: CGI of earlier scheme with pitched housing to front with 21 storey tower



- 6.15 Zodiac Court/House is not a heritage asset, but has some architectural interest and a distinct character, and officers have encouraged the applicant team to respond to this in their proposals. Key features include signs of the Zodiac relief panels, façade design and articulation of entrances. The Nightclub and dance hall through its various iterations formed a key part of London Road's strong musical heritage.
- 6.16 Long range views assessments will be required within a heritage statement to confirm whether the proposal would affect heritage assets further from the site such as conservation areas towards central Croydon including Central Croydon and Wellesley Road (North) and nearby listed buildings.

Layout and Access

Corner Block

- 6.17 In the most recent iteration a small retail unit has been introduced with access from the widened public realm and so avoids potential clash with footfall along London Road. The residential communal entrance and lobby would be from Chatfield Road, which provides additional activity and is supported.
- 6.18 There appears to be an opportunity to bring daylight into the core of the tower from the southern edge to improve the internal qualities in the communal

circulation. This may also lead to a subtle change to the architectural treatment on this corner of the block.

Image 12: corner building floor layout



Rear Block

6.19 Currently there is no natural daylight reaching the internal circulation area at present. Further exploration of this matter is needed and this could potentially be achieved by moving the services riser and making both the external wall and the dividing partition of the stairwell fire-rated glazing to allow some natural southerly light to spill into the central areas. This would improve the quality of the internal circulation area and also help to highlight residents with the external amenity access.

Ground Floor - London Road

6.20 The depth of the two large commercial units fronting London Road appears to have increased in the current iteration narrowing the public realm landscaping to the frontage. This is not supported.

6.21 Serious concerns remain given the intended end users and scale of the unit that the majority of the ground level will be inactive and opaque replicating some of the issues with other broad public footway areas along London Road. Social infrastructure of some form has been discussed at various point within the pre-application discussions. This is something officers would like to see achieved in some way to improve the provision of the area for the community given the scale of development. The options for this could be varied and the applicant has been strongly encouraged to commence in-depth community consultation to facilitate conversations about what form this may take ahead of any application submission. The applicants have been engaged in conversations with local residents and are very willing to further engage with the local community.

6.22 It is also unclear how the retail space 01b will function and so further information is expected.

6.23 The location of the car park entrance on London Road is not supported due to the reduction and impact on the pedestrian environment quality and safety given the access road crossover will also be present alongside it.

Ground Floor - Chatfield Road

6.24 Residential access for the rear block is via Chatfield Road providing a new pedestrian access point. This appears wide and generous in plan and will provide

activity along this residential street where currently the existing properties are faced with blank frontages and escape stairs.

- 6.25 The substation is being retained. Currently the proposals show this as remaining in its location projecting forward of the main building line. This narrows the proposed footway width and therefore potential for greening. It will be desirable if this is brought back into the overall envelope of the façade. There is an additional entrance to the rear block lobby via the carpark. The design of this will need attention to ensure it is legible and safe as it will be the main entrance for the rear tower.

Architectural Expression and Materials

- 6.26 The applicant has documented the architectural language of the existing structures to help inform how the proposed additions can enhance and compliment this.

Image 13: existing building texture study



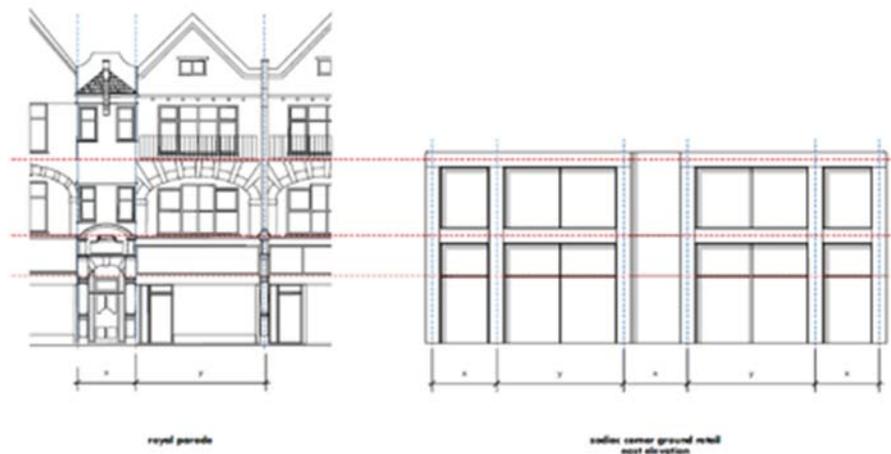
- 6.27 The proposed architectural language takes cues from the strong horizontal primary geometry of the existing structures and their previous office use. The next stage of development should seek to develop a grain, scale, material quality and detailing expression which feels more residential in character. At the present stage of resolution the proposals appear stark and so as part of the more detailed development of the façade treatments further work on exploring how to compliment the various textural and tonal variations the existing building makes use of will be needed. A suite of differing textures/articulations should be considered for the cladding panels. The powder coated textures suggested to provide this do not appear adequate in quality.
- 6.28 The applicant team have also begun detailed character analysis across a range of categories and scales of the context. This is important to ensure the elevational expression in different ways acts as a bridge between the expression of Zodiac Court and the surrounding context. To aid the architectural development officers would like to see additional precedent research and critical analysis should be undertaken drawing out lessons from schemes in similar contexts and site conditions i.e. mid-century developments.

Plinth

London Road

- 6.29 The height of the plinth is of a scale that is equivalent to the Royal Mansions opposite and the proposals seek to visually match key facade divisions within the elevational hierarchy of the parade with a simple and contemporary language.
- 6.30 A contemporary language is supported to tie in with the rest of the proposals and existing Zodiac buildings. However, officers have asked for further design development. The large expanses of glazing, dominant primary structure and subtle secondary partitioning breaks do not seem an adequate compliment to the elevational structure and grain of the units opposite. In addition, it gives an overly generic commercial appearance.
- 6.31 Further design work is required. This should be through nuancing the developing architectural language of the overall scheme to respond the LHA context and the applicant's aspirations to restore the street scape along this section of London Road.

Image 14: Bay study of LHA and proposal



- 6.32 The design of the plinth would benefit from detailed precedent study of similar contexts to understand how contemporary responses have been articulated. Officers in particular are of the view the proportion of solid to void (glazing) needs to be reviewed as part of this. The quantum of glazing is also a concern regarding the activity of these frontages given the likely type of retail occupier.
- 6.33 The quality of the solid materials should be of richer material quality and detailing while maintaining connection with the rest of the masterplan. This should be informed by the analysis of the LHA the applicant has undertaken, including proportions and notable details, and translated into a contemporary language. Additionally, there is now quite a large extent of highly visible louvres with associated plant equipment in areas of the elevation. These need to be rethought and synthesised with the overall elevational design as they appear somewhat disconnected.

Cavendish Road

- 6.34 The existing plinth façade is very poor and there are great opportunities to improve the visual amenity of the residential properties opposite. The applicant team has begun to utilise several approaches to achieve this including a significant increase in greening (further confirmation required that this is a green

wall) to screen and enhance the streetscape, which is supported. Further development should explore; the residential context opposite and the rest of the site's masterplan; how the bike store could be visually open to provide further activity; carpark gates, façade design of the bin store, substation and upper first floor of the new plinth proposals at the northern end of the road.

Chatfield Road

- 6.35 All of the enhancements are covered under the application 20/06149/FUL including proposed green walls, tree / under-storey planting, entrance reconfiguration and materials and is currently under consideration.

Plinth facing Vistec House

- 6.36 The articulation of this section of the plinth façade has not been shared with officers yet and will need careful thought to protect the amenity of the residents adjoining in Vistec House.

Blocks

Corner Block

- 6.37 The columns framing the residential entrance on Chatfield Road appear disproportionate to the overall tower scale and may be overly imposing in the public realm. Expressing the entrance is supported in principle however and so further development should be undertaken to explore how this can be articulated within the suit of entrances across the site.

Image 15: Proposed corner building



- 6.38 Officers suggest that given the tower is a standalone element its ground level expression could differ from the rest of the commercial frontage in proportion and articulation. At present its base appears a little too high in relation to its whole.

- 6.39 Balconies have been placed externally to reduce the overall width of the block. They are placed on the northern and southern edges which reduces the visual impact from the main axial approaches along London Road. However, this widens the envelope within the backdrop to the residential streets to the east and west and so will need careful consideration as their articulation is developed including partial screening for privacy.

- 6.40 The façade treatment alternates between lighter panels and darker glazing bands. The contrast between these two should not be too great as to appear overly stark. This is one aspect that will require further investigation.
- 6.41 There are several elements highlighted in the same green panel being used on the façade changes of the existing buildings. These are supported subject to further development developing the articulation and material qualities of this cladding so that it has visual interest at close and distant proximity.

Rear Block

- 6.42 Similar comments stand regarding the contrast of the light panels and darker areas of glazing that have been made in relation to the corner block. The areas of yellow highlight are questioned as this is no longer present within the separate application material for the existing tower recladding. Using the copper hue panels that match the rest of the masterplan is a more appropriate suggestion. The nature of these panels also requires development along with the material and articulation development of the lighter cladding type or types. As with the corner block the balconies do require further development in their design. The lighter banding has been made more slender in the central bay which has helped to break up the massing.

Image 16: rear building and alterations to existing Zodiac House



Landscape

- 6.43 Given the range of spaces, developing several distinct character areas is an appropriate approach. These spaces should facilitate a range of amenity activities, planting with rear round variety, seasonal changes and maturation of the landscape from day 1, year 5 and year 15.
- 6.44 Green walls where proposed could be a highly impactful and defining feature and an opportunity for biodiversity on site. However, these are features that are notoriously high maintenance and at risk of becoming an eyesore if not tended to adequately. A high level of rigor to develop its detailing needs to be demonstrated. Officers would like to see engagement with a green wall specialist now to inform design development.
- 6.45 In view of the London Plan evidence will be required showing how a future scheme meets the Urban Greening Factor minimum target to 0.4

Public Realm

- 6.46 The applicant is proposing a green frontage to all of the sites frontages and particularly along London Road helping to improve provision of green amenity and biodiversity that should set a precedent for further enhancements along this heavily congested and stark streetscape. This is fully supported.
- 6.47 The latest changes of introducing an access to the car park from London Road and as a result the front landscaping space has been reduced. This is not supported and access should be relocated (see transportation section).
- 6.48 The scale of the landscaping needs to be adequate along the frontage to act as a strong counter-point to the busy London Road and its associated noise and air pollution impacts. The landscaping needs to be a bold defining feature including planting selections to provide year round interest and buffer to the road. There is potential to do this but currently it is unclear this is the case.
- 6.49 While some reduction has occurred the number of paths and their widths still appear oversized and dominant taking priority over the soft landscape. Specifically, the connecting secondary paths between the main entrances and the flaring of the main entrance access ways do not seem necessary. Officers suggest that dimensions should be provided to ensure minimum widths that still ensure accessibility, so that the soft landscaping can be maximised.

Image 17: proposed landscaping to front



- 6.50 If feasible this landscaping should be delivered within the early delivery phases to provide maximum public benefit early on.
- 6.51 Street trees and green walls are proposed on Cavendish Road and Chatfield Road which are supported in principle supported.

Public Art

- 6.52 A public art strategy will need to be formed as part of any. It is worth noting that under a separate application the existing building's relief sculptures of the zodiac signs are being consolidated above the new residential entrance from Chatfield Road. This should be designed in early and not left post-submission.

Impact on Adjoining Occupiers Living Conditions

- 6.53 There are neighbours within close proximity on all four sides of the development; Cavendish Road, Chatfield Road, London Road (mainly Vistec House) and on the opposing side of London Road.

- 6.54 In relation to overlooking and privacy, the Council's SPD recommends that a separation distance of 18m be retained between facing habitable room windows (or balcony railings) of proposed and existing (third party) windows/developments, and a distance of at least 12m between habitable room windows within the development itself.
- 6.55 The scheme that is currently being implemented at Vistec House has single aspect units facing the site. Any new development will have to be mindful of this challenging relationship. The current distance between the tower and this property is around 16m which is tight and slightly below the standard identified above. Going forward the design will have to make sure that direct window to window alignment is omitted / minimised. It should also be noted that the podium level would be set further away from Vistec House than the existing building, so there could potentially be an improvement in terms of outlook for the lower level occupiers.
- 6.56 The distance between the taller tower and 14 Cavendish road (corner building behind Vistec House) is approximately 17.5m, but is not in direct alignment so no harmful overlooking is envisaged. The properties on the opposite side of Cavendish Road are separated by 24m so it is unlikely that occupiers would suffer a harmful loss of privacy.
- 6.57 There is a distance of 18.5m between the rear tower and the existing Zodiac tower and therefore the relationship with the existing Zodiac building in terms of privacy is acceptable.
- 6.58 Although the distance between the corner building and the prior approval units in the existing building is not known at this stage it does appear below the standards identified above, which is a concern.
- 6.59 Due to the presence of the amenity deck area careful thought will be needed to make sure there is no overlooking from these outdoor areas to the neighbouring properties, whilst not creating any light/outlook issues from possible screening.
- 6.60 There are windows and balconies that would face towards Chatfield Road and London Road from the corner tower, however, given the separation, 19m (from Chatfield Road houses) it is not anticipated that occupiers on the opposing side would suffer a harmful loss of privacy, especially as such a relationship is not uncommon in built up areas such as this.
- 6.61 In relation to daylight and sunlight, the neighbouring housing has (at a high level) been taken into consideration when determining the placing of massing and the development of the options. Primarily a balance has been struck between the properties in Vistec House, those in the existing Zodiac Court and those on Cavendish Road. However, further detailed exploration has been requested through the submission of a daylight and sunlight assessment. A detailed understanding of the rooms and uses of any impacted properties is paramount and the earlier this is known the better so it can inform discussions and establish the principle acceptability of the height proposed, or not. At the time of writing this has not been provided, but is expected to be received soon and can be included in the addendum.

- 6.62 The relationship with the PD scheme will also need to be carefully considered. The corner building is within fairly close proximity and there are some facing windows. A solution for this needs to be found and it could potential involve altering the internal layout of the PD scheme as part of this application. In addition, those units do not include any private outdoor space for the occupiers, and it is therefore suggested that occupiers could access the communal outdoor spaces.
- 6.63 Careful thought about entrances and outdoor play/amenity spaces is required so that any noise and general disturbance is minimised, especially from the new vehicle access for deliveries along the boundary with Vistec House. Whilst there is no objection in principle to the service road, this is subject to further understanding of the acoustic and visual impacts (of the open servicing route and loading bay area) on the adjoining Vistec House in terms of a possible canyoning effect of vehicular noise. The service road access will also need to be managed or designed to avoid any unauthorised use.
- 6.64 Given the height of the buildings and the proximity of the tower to residential properties (and the impact mitigation can sometimes have on design of both the tower and wider area), an early indication of the wind impact is important. Although requested this is yet to be received due to the applicant seeking to ratify the massing from a townscape perspective. The outcome from such a report needs to be known (alongside other aspects e.g. daylight / views etc) to establish the acceptability, or not, of the taller elements.

Mix and Quality of Accommodation Provided

- 6.65 The proposal aims to provide 109 homes (although could be more if the PD units are brought into the scheme see below). In terms of the 109 homes, the current drawings show the residential accommodation starting at first floor, above the commercial element, in both the corner and taller buildings. There is associated entrance and vehicle parking at ground and basement levels respectively. Evolving internal floorplans have been provided for the lower floors (basement-third floor) and so limited assessment can be made on the quality of the proposed units or the developments compliance with accessibility standards.
- 6.66 Croydon Local Plan 2018 (adopted February 2018) policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 allows for setting preferred mixes on individual sites via table 4.1. Applying table 4.1 to this site (central setting with a PTAL of 4, 5, 6a or 6b) shows a requirement of 20% 3+ bedrooms units unless there is agreement from an affordable housing provider (that these are not viable or needed).
- 6.67 The proposed development would provide 14 x 3 bedroom units, which equates to 13%, and so would fall below the required 20%. This is a matter that the applicant will need to address and resolve.
- 6.68 It has been made clear that minimum floor areas (London Plan and National Standards) must be complied with and the private amenity space must meet the minimum required relevant to the unit size. The floor plans show that a number of the units exceed the relevant spaces standard, which is welcomed, but does

suggest that the massing could potentially be reduced and the units still comply with standards.

6.69 London Plan standards are clear that developments should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. There is concern regarding the central north facing units on the taller tower (image below left). Although there is an element of duality, it is minimal (see green arrow on same image), given this it will need to be demonstrated that the units have adequate passive ventilation, daylight and avoid overheating. The central image shows 1 bedroom units that would be north facing; this is not supported and a revised layout should be explored.

6.70 Regardless of the final layout, daylight adequacy analysis must be submitted to illustrate that all habitable rooms within the development proposals will achieve the minimum target ADF values set by BRE Guidance. The units on the corner building are dual aspect (image below right). However, the floors that are level with the permitted development scheme have very close window to window distances, which would impact future occupier privacy levels.

Image 18: typical floor areas of rear and corner building

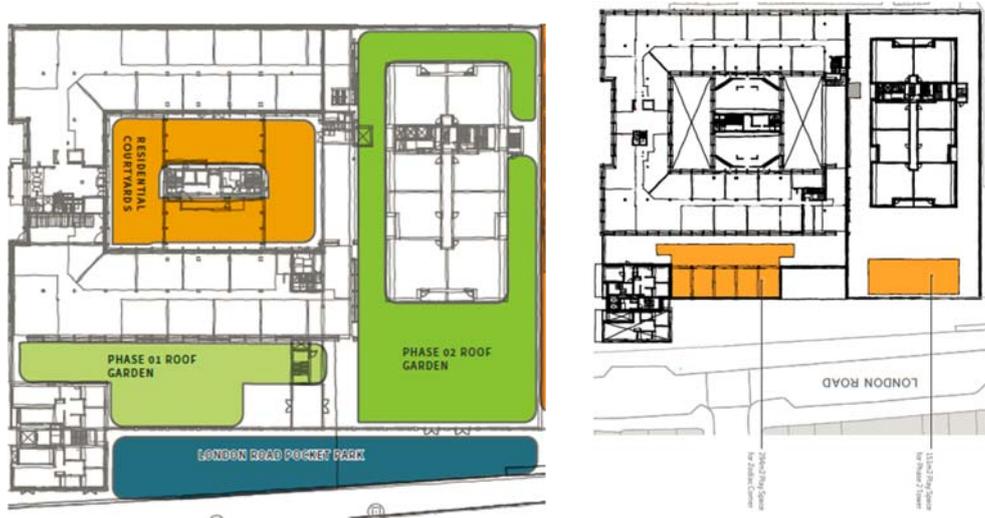


6.71 It is also important that schemes should avoid having no more than 8 units to a core per floor, which appears achievable and is supported.

6.72 Preliminary landscaping plans have been provided demonstrating that communal amenity space (green shading in image below left) and playspace within that (orange shading in image below right) would be provided primarily on the deck level, which is accepted. Although the deck location aids natural surveillance from the proposed units, a greater level of defensible space is required for future occupiers on the same level as the internal privacy does not currently appear well managed. Calculations of playspace have not been carried out, although this is not expected at this stage they are based on the potential child yield of the

final submission. However, it does appear that space could be made to increase these areas if needed.

Image 19: proposed amenity and play space



6.73 The main entrance to the corner building is well situated and clearly visible from both Chatfield Road and London Road. The entrance to the taller tower is off Cavendish road, and whilst not clear from London Road, it does provide a level of activity to the rear of the building that the current site misses.

6.74 The applicant is aware that housing should cater for residents' changing needs over their lifetime and that 10% of units would need to be wheelchair accessible and 90% adaptable. It is noted that two lifts are included in both residential buildings, which is supported. A fire statement will be required as part of any formal submission (D12 of the London Plan); this should be developed as part of the pre-application alongside our Building Control team.

6.75 The impact of noise on residential amenity will need to be considered, especially as London Road is a busy route and the creation of commercial units with a new delivery route is also proposed. The applicant will need to demonstrate how internal areas and balconies achieve an acceptable standard, accordingly a noise assessment is expected with any future application.

Affordable Housing

6.76 There has not been a meeting related to affordable housing discussions, however, a short note with the applicants intentions and 3 possible options was recently submitted as follows;

Option 1: 50% Affordable Housing comprising the PD and Phase 1 residential

- This option would include the approved PD scheme for Zodiac Court within the application site (although no changes to the layouts or design would be sought to the already approved details).
- The total number of units, therefore, proposed would be:
 - PD scheme – 71 units

- Phase 1 residential – 17 units
 - Phase 2 residential – 92 units
 - Total = 180 units
- The offer would be to secure all of the PD and Phase 1 residential as affordable housing at a discount market rent (DMR) of 80%. This would equate to an offer of 88 affordable units (c.50% by units). The Phase 2 residential units would be unrestricted and provided as for sale on the open market.
 - The affordable offer would include units approved under permitted development rights and not in strict accordance with London Plan space standards (the applicant advises that they have been designed with input for a potential registered provider who would manage them, although no evidence has been submitted to corroborate this at this stage).

Option 2: 35% Affordable Housing across Phases 1 and 2 (excluding the PD scheme)

- This option would exclude the PD scheme from the application site.
- The total number of units, therefore, proposed would be:
 - Phase 1 residential – 17 units
 - Phase 2 residential – 92 unit
 - Total = 109 units
- The offer would be to provide an affordable housing offer as follows:
 - Phase 1 residential – All units (17) as a Discount Market Rent of 80%.
 - Phase 2 residential – 21 units at London Living Rent (LLR).
- This would equate to an offer of 38 affordable units (35% by units) at a split of 45:55 DMR and LLR. The affordable units would be split between the Phase 1 (detailed) and Phase 2 (outline) elements of the masterplan.
- The rest of the Phase 2 residential units would be covenanted for rent on the open market for 15 years.

Option 3: Viability Tested Route to Determining Affordable Housing for Phase 1 and 2 only

- If neither Options 1 or 2 can be supported by Croydon or the GLA then the final option is to examine the maximum reasonable amount of affordable housing that can be achieved as part of the development by undertaking a viability assessment as part of the planning application.
- The applicant has stated that on the basis of some initial high level analysis this would appear to yield significantly less than 35% affordable housing. Officers note this has not been independently reviewed.

6.77 Prior to the discussion of the options, it should be noted that the percentage of affordable housing on a scheme should be measured in habitable rooms. This has not been accounted for in the initial offer as it has been measured in units, however, the principle of the matters can still be discussed.

Option 1

- 6.78 The proposal in Option 1 is not a build to rent scheme as the private units are ear-marked for sale. Therefore Option 1 is assessed against policies SP2.4 and 2.5 of the Croydon Local Plan and policies H5 and H6 of the London Plan 2021. As the proposal for 50% DMR is not compliant with the tenure mix expectations of SP2.4 and London Plan H6 (which requires a minimum of 30% of the affordable housing to be provided for low cost rent), the application could not follow the fast-track route and would be subject to viability testing.
- 6.79 The proposal for 50% DMR could potentially be acceptable if the LPA and the GLA were to agree that the viability assessment justifies providing all of the affordable housing in the form of DMR units. However, the LPA (and GLA) could also take the view that if viability is constrained a lower level of affordable housing should be provided with a more acceptable tenure mix including low cost rent and LLR units.
- 6.80 A significant issue with Option 1 is the proposal to allocate all of the PD units for affordable housing, which include units that are under-sized and non-space compliant. The proposed transfer of these units to a Register Provider may be difficult to achieve in practice because of this

Option 2

- 6.81 Option 2 is a Build to Rent proposal, with all 35% of the affordable units to be provided as DMR (in line with NPPF guidelines). The Local Plan has no policy on Build to Rent and so policy H11 of the London Plan applies. The policy states that where a developer is proposing a Build to Rent development which meets the relevant criteria (set out in Part B of the policy), the affordable housing offer can be entirely solely DMR at a genuinely affordable rent, preferably LLR level. DMR homes must also be secured in perpetuity.
- 6.82 The proposal would meet the qualification criteria for a build to rent scheme set out in policy H11. The proposal for 35% affordable housing in the form of DMR, along with the inclusion of 21 (55%) of the DMR units at LLR equivalent rents (which exceeds the Mayor's requirement for at least 30% to be provided at LLR rent levels), means that this scheme could potentially be able to qualify to be assessed under the fast-track route (not being subject to a Financial Viability Assessment and late stage review mechanism). However, it should be noted that to follow the Fast Track Route schemes must also meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor e.g. if it unacceptably diverges from other policies in the plan, say in terms of housing mix, it cannot qualify as a fast track scheme.
- 6.83 Option 2 offers a potentially (subject to habitable room calculations) policy compliant route and the provision of over 50% of the DMR units at LLR levels is welcomed. Going forward the main area for discussion with option 2 would be the rent levels that apply to the remaining DMR units, which must also be genuinely affordable. As a minimum officers would want to introduce rent caps for these units rather than agreeing to these being set at the maximum level of 80% market rent. Ideally officers would want to set an upper rent level for each property size. Without this past experience has shown that a higher market rent

valuation on a new build scheme, might result in 80% of market rent being as high as rents in the private rented sector and therefore not genuinely affordable.

- 6.84 It is noted that the LLR in option 2 is in the latter phase, however, the phase 2 still delivers all the residential units as a form of affordable housing. It would be important to secure the phase 2 affordable units as early as possible in that phase.

Option 3

- 6.85 In terms of option 3 the site allocation is clear that there are 'significant issues with viability of redevelopment that will need to be overcome' and it is therefore acknowledged that a viability tested route could involve a lower affordable housing offer.
- 6.86 On balance option 2 would be officers preferred route, but subject to genuinely affordable rent levels (and habitable room calculations). Member's opinion on the options would be welcomed.

Highways

Trip generation

- 6.87 Currently officers have not received any trip generation information, but a car free residential development would not generate a significant amount of traffic apart from deliveries, servicing, car club, visitors etc. The main trip generator would be the commercial use, for which surveys have been requested (of an existing use similar to that which would relocate to this site). For a comprehensive analysis trip generation information relating to the prior approval schemes will need to be incorporated. Any increase in trip generation from the existing uses to proposed uses if any, will need to be explained.

Residential Parking

- 6.88 At this stage it is not clear how much residential parking is proposed in the basement parking area. However, the site could be car free apart from Blue Badge parking spaces (to London Plan policy requirement). These spaces should be as close as possible to the residential core, so an improvement from the current situation is sought. The residential parking numbers for the PD application in the basement should also be clarified in light of the changes that this proposal would bring. Officers will also need clarification on whether there is the possibility of on-site car club parking. Car club membership for the future occupiers will be required. As the site is in a Controlled Parking Zone it is expected that resident parking permits will be removed via a legal agreement.

Commercial Parking

- 6.89 As with the residential parking the number of commercial parking spaces in the car park must be clarified and how the parking as a whole will be managed so that retail customers use only the correctly allocated spaces. Parking numbers will again have to be London Plan compliant.

Cycle parking

6.90 Cycle parking for the residential element of the proposal is shown in the basement. The cycle parking must be provided by a 50/50 mix of Sheffield stands and two tier stands. 5% of the Sheffield stands must be provided for wider and adapted bikes. There are some concerns that the cyclists are going to have a steep ramp to use which may be more difficult for wider and adapted bikes and children, further clarification will be expected on how the spaces are accessed. Visitor cycle spaces to London Plan requirements will be needed on the frontage, however, this could have a dramatic effect on the frontage landscaping so officers will need sight of this integration to assess its suitability.

Access / deliveries

6.91 A delivery and service access ramp is provided from London Road which is acceptable subject to sightlines and that large delivery vehicles are able to enter and leave the site in forward gear. Careful management of this will be needed though as only one vehicle can enter and exit at a time. A servicing management plan will be required and will need to include residential servicing (and possibly time limit on commercial servicing). As above clarification of serving for the existing and PD units will need to be factored in.

6.92 In terms of cars, the drawings continue to have an access to the car park from the London Road frontage, with an exit on Cavendish Road. Whilst it is now adjacent to the delivery access, previously it was through the middle of the London Road frontage. Officers had previously raised townscape and transportation concerns with an access to the car park from London Road. The current position creates a crossover too wide for pedestrians to negotiate and further limits the public realm space. As per previous advice re-use of the Cavendish Road entry and exit to the car park is seen as a more appropriate solution. Officers are also suggesting the possibility of a new entry to the car park (if needed and subject to data) off Cavendish Road (by repositioning parking bays and ideally without loss of bays) to help with entry and exit of the car park. There are existing vehicle access points onto Cavendish Road, which have been used by the development for many years.

6.93 The above comments are based on the final development. However, the inter-phase (between full and outline elements) servicing must be explained clearly and shown to be able to work, how long this is expected to be in place and how the long term servicing will be secured. Interim solutions to date have shown the use of the frontage for deliveries, which again raises townscape and transportation concerns. Ideally the long term servicing would be put in place prior to the occupation of the phase 1 commercial units. Officers have asked the applicant team to explore how delivery / servicing can work in the transitional period.

Waste management

6.94 Refuse vehicles for the residential element of the proposals would likely be able to be undertaken from the roadside (Cavendish and Chatfield) pending the refuse stores being within the required distances and dropped kerbs being positioned so that collections of large refuse bins can be facilitated. Commercial units will need to carry out their own refuse/recycling and if required have a commercial trade refuse agreement with a private company for collections via the servicing

area. Regardless a waste management plan will be required for the site as a whole.

Mitigation

- 6.95 It is likely that contributions (starting point being £1,500 per unit) to secure funding towards improvements of local walking/cycling routes that will be used by residents will be required, along with improvements to the London Road frontage and (possibly) the side roads around the site subject to condition surveys. Removal of unused crossovers would improve pedestrian access / safety and restriction of access to parking permits will be needed. TfL will be consulted at application stage and may have further requirements.

Environment

Building performance

- 6.96 All major development (both residential and commercial), such as this, should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. BREEAM Excellent will be required for the non-residential elements of the scheme. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions. As this scheme will be referable to the Mayor the whole life-cycle carbon emissions should be calculated through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Heat Risk needs to be managed and water consumption restricted.
- 6.97 Given that work is mainly still on going in relation to the townscape and transportation matters the majority of these elements are still being developed and further detail will be known when the scheme is advanced. The scheme should be able to meet the requirements.

Flooding

- 6.98 As highlighted above the site is within an area at risk from surface/ground water flooding. The requisite documents will need to be submitted with an application, however, priority to the provision of Sustainable Drainage Systems (SuDS) should be made unless demonstrated to be inappropriate. Care needs to be taken given the location within an area at risk from groundwater flooding given the basement provision to ensure there is no in principle objection.
- 6.99 The applicants have been advised to undertake separate pre-application consultation with the Lead Local Flood Authority (LLFA).

Air

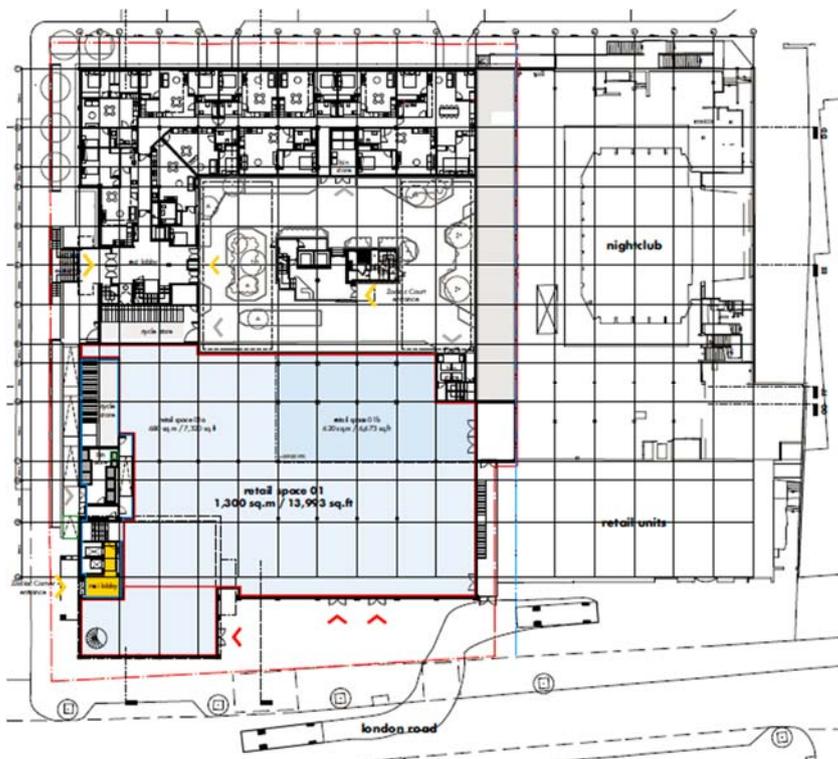
- 6.100 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). An air quality report will need to be submitted with an application. This must include how the amenity decks and balconies fronting London Road are suitable from an air quality perspective. Should the

development increase air pollution or be located in an area subject to breaches then mitigation and/or contributions would be sought.

Other Matters

- 6.101 It is planned that a single planning application will be submitted to cover the whole site and, as highlighted above, will be a hybrid planning application. The outline elements of the hybrid application relating to Phase 2 will reserve most of the detailed design elements for future approval at the Reserved Matters stage but will establish a series of approved parameters and principles within three approved application documents: the Parameter Plans, the Development Specification, and the Design Code. This is not unusual and provided there is sufficient dialogue with officers this form of documentation can be suitably robust to ensure an exceptional quality scheme.
- 6.102 At the moment however, officers are concerned about the transitional arrangement between the phases. The first phase does not benefit from the dedicated delivery entrance and turning area (under the commercial unit) and relies upon the frontage area of the site (see image below). This has both significant townscape and highway impacts. Should Phase 2 never be started then there is the possibility that the transitional arrangements would be permanent. Therefore any transitional arrangements have to be acceptable as they could be the end-state; this requires further work and justification.

Image 20: phase 1 drawing with proposed temporary delivery from London road onto land in front of building.



Mitigation

6.103 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 (this is not an exhaustive list):

- 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
- Retention of scheme architects
- Phasing

7 SPECIFIC FEEDBACK REQUESTED

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

1. The acceptability of the residential / commercial redevelopment.
2. The amount and distribution of scale/bulk/height across the site.
3. The front building line and relationship between hard and soft landscaping
4. Design approach to the development and elevational details including materiality
5. Visual relationships between the development and surrounding developments (including local heritage impacts).
6. Potential impacts on neighbouring residential amenities in terms of light, outlook and privacy.
7. The mix and standard of the accommodation provided and how to best meet the needs of the residents in terms of layout, services provided and the amount and quality of communal space.
8. Affordable housing provision (whether there is support for option 2)
9. The relationship between the proposed car entrance to the front and the impact on highway safety and design considerations (seeking to provide a more pleasant and lush landscaped 'pocket park' to the London Road frontage).
10. The acceptability of using the frontage for deliveries for Phase 1.

8 PROCEDURAL MATTERS

- 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. One meeting has been held thus far and a formal response has not yet been issued. Whilst supportive of the principle (subject to satisfying a sequential test), their main feedback focussed on the amount of affordable housing to be delivered by the scheme, with a focus on including some lower rent levels, visual and neighbour impacts from the corner and rear buildings.