

**PART 5: Development Presentations**

**Item 5.2**

**1. DETAILS OF THE DEVELOPMENT**

Ref: 17/05566/PRE  
 Location: Part of Car Park, Wandle Road, Croydon CR0 1DX  
 Ward: Fairfield  
 Description: Presentation of a pre-application scheme for the erection a residential building of part 5, 23 and 25 storeys to accommodate approximately 130 flats and 950m2 of flexible office, retail and restaurant space; landscaping and public realm works; access and other associated works.  
 Drawing Nos: N/A  
 Applicant: Alison Brennan – Brick by Brick  
 Agent: Peter Twemlow – DP9  
 Case Officer: Richard Freeman

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>TOTAL</b>
<b>TOTAL FLATS</b>	56	58	14	128
<b>AFFORDABLE (INTERMEDIATE) FLATS</b>	27	27	14	68
<b>PRIVATE FLATS</b>	29	31	0	60

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
12 blue badge spaces	202

**2. PROCEDURAL NOTE**

- 2.1 This report is in an experimental format to provide a more focussed approach to pre application presentation to and engagement with Planning Committee. The report covers the following points:
- a. Executive summary of key issues with scheme
  - b. Site briefing
  - c. Summary of matters for consideration
  - d. Officers’ preliminary conclusions
- 2.2 Officers would be grateful for feedback from the Planning Committee on the success of the format.

**3. EXECUTIVE SUMMARY OF KEY ISSUES WITH SCHEME**

- 3.1 The proposed scheme is a mixed use, residential led development comprising a part 5, 23 and 25 storey tower currently accommodating 128 flats and 950m2 of flexible office and retail/restaurant space (Use Classes B1, A1 and A3).

- 3.2 The scheme has developed through a series of pre-application meetings and was reviewed by the Place Review Panel in November 2016 (at a very early stage) and October 2017. The conclusions of the Place Review Panel are included at the end of this report. The case has also been viewed by GLA officers at pre application (meeting held on the 14<sup>th</sup> November 2017). The applicant intends to submit the proposal shortly after the presentation to Planning Committee and is keen to consider further comments prior to submission.
- 3.3 Officers consider that the scheme is developing in a positive fashion. There are a number of key issues which officers are keen to draw to Members attention and to generate debate:

#### Provision of Affordable Housing

The scheme currently shows provision of 53% of units as being affordable, with all proposed as shared ownership/intermediate accommodation, which equates to 56% affordable housing by habitable room. Whilst this overall amount of affordable housing provision is very positive and numerically, is higher than policy requires, policy also requires affordable housing to be delivered as mixed tenures (affordable rent and intermediate) at a ratio of 60:40 in favour of affordable rent. This split is required to ensure that housing development accommodates a range of affordable housing needs.

Whilst this scheme manages to provide 53% of units as affordable housing by proposing all as intermediate tenures, policy seeks to secure as much affordable housing as possible (up to 50%) whilst also meeting local housing requirements through the provision of affordable rent. There is concern that the development, at present, fails to deliver on a range of affordable housing needs. Officers are working with the applicant to consider alternatives including the additional of some affordable rent products or intermediate rental products with higher levels of discount market rent. This is discussed further at paragraph 5.3.

#### Massing and Heritage Impact.

The scheme is in close proximity to a number of heritage assets, most importantly Grade I and II\* Listed Buildings (the Croydon Minster, the Old Palace and the Pumping Station respectively) as well as Conservation Areas, a Scheduled Ancient Monument and numerous Grade II Listed Buildings. At the time of report writing, whilst a taller building might well be considered acceptable, insufficient information has been submitted for officers to form a view on the proposal from this perspective.

#### Ground floor and relation with the street.

The ground floor as currently shown has very large areas of servicing space and limited visual connections with the street from “active” areas of the building’s frontage. This is compounded by needing to raise the floor level in order to overcome flood risk, which will necessarily result in level changes, stairs and ramps between the pavement and the building. Additionally, officers are concerned about the success of the flexible B1/A1/A3 unit on the ground floor,

given its relationship with the flyover. Officers recommend that this is re-considered and integrated into the residential lobby design as a multi-functional area.

### Residential Amenity

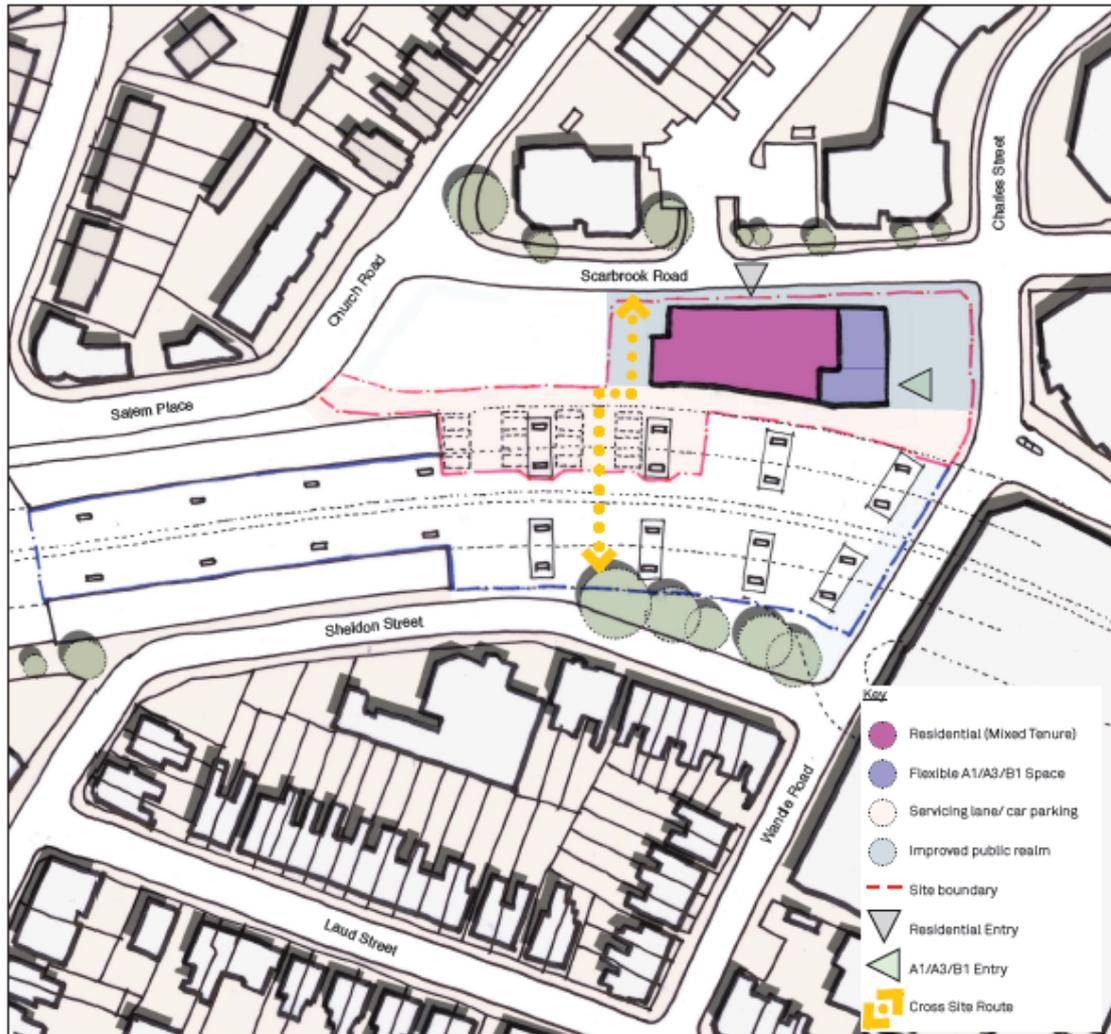
Due to the location of the site, the building will require mechanical ventilation to overcome air quality and overheating issues. Amenity spaces are provided as enclosed winter gardens as opposed to balconies and no communal amenity space is currently proposed. Full details of the ventilation approach have yet to be provided to officers but the scheme will require mechanical ventilation with NO<sub>x</sub> filters which are likely to be expensive to maintain. Whilst communal amenity space should be required, internal communal space could well prove to be acceptable, in view of site constraints.

### Impact on adjoining occupiers

The scheme has some impact on the light and outlook to properties on the opposite side of Scarbrook Road. This has been compared to a mid-rise slab block scheme and the impacts found to be broadly comparable. Officers are satisfied with this approach given the high existing access to light and outlook and the Metropolitan Centre location of the scheme. Wind testing needs to be undertaken and more detailed daylight and sunlight impacts considered.

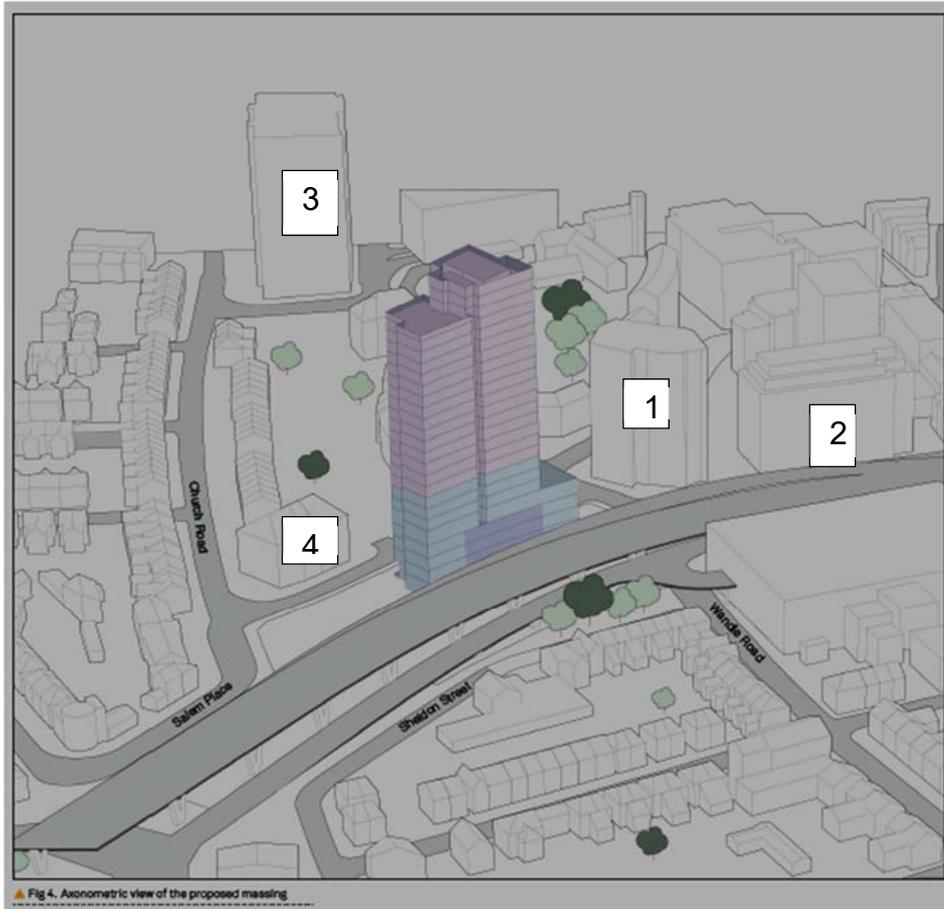
## **4. SITE BRIEFING**

- 4.1 The site is located adjacent to and under the Croydon flyover and is currently used as a Council and pay and display car park. The new local plan (Croydon Local Plan: Strategic Policies 2017 Partial Review (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals 2017 (CLP2)) allocate the site for bus standing, an energy centre and residential uses. It is in the Croydon Metropolitan Centre, the Opportunity Area, an area of high density and an Archaeological Priority Area and is at risk of flooding (see plans below).
- 4.2 The area outlined in red hatching on the plan (below) is the application site for the current scheme with the proposed main residential entrance fronting onto Scarbrook Road, the secondary office entrance on Wandle Road with a small landscaped area to the frontage. A service road would run along the rear (parallel to the flyover) with disabled parking spaces being provided off this access. Access would be off Wandle Road with egress onto Church Road.
- 4.3 The area outlined in blue (under the flyover) is the part of the site proposed for bus standing, to remove buses from Central Croydon. A number of layouts for this part of the site have been investigated at high level but this area does not form part of the pre application proposals.



▲ Fig 10. Ground floor entrance and public realm

- 4.4 The area not outlined (the area at the junction of Scarbrook Road and Church Road) is the proposed location for an energy centre to supply a future district
- 4.5 There are a number of tall buildings already in the area as the drawing below demonstrates.
- 4.6 The building on the corner of Whitgift Street and Wandle Road (1) is 13 storeys in height, the building on Whitgift Street (2) is ten storeys in height and Ryland House (3) (identified as having a negative impact on the Church Street, Central Croydon and Croydon Minster Conservation Areas and Listed Buildings within them) is 14 storeys in height. Some flats on Scarbrook Road are four storeys in height (4).



## 5. SUMMARY OF MATTERS FOR CONSIDERATION

5.1 The main matters for consider in a future submission are:

### 5.2 Principle of Development

- The wider site is allocated in both existing and emerging plans for provision of bus standing (to remove bus standing from Central Croydon), an energy centre (to supply a future district heat and power network for the town centre) and for residential purposes. As the residential use is coming forward first, the scheme will need to demonstrate that the other site allocations can be accommodated on site in future scenarios.

### 5.3 Affordable Housing Provision

- The scheme is currently proposing that whilst a proportion of units will be offered for outright sale, 53% of units are offered as affordable housing, albeit as intermediate housing as shared ownership. This is a high overall headline figure of affordable housing and should be welcomed in principle although one also needs to have an eye on overall levels of affordability and the desire to accommodate a wide range of affordable housing needs;
- Policy requires a 60:40 split of affordable housing tenures between affordable rent and shared ownership, with up to a 50% provision of units, depending on

viability. Viability testing is in early stages but it appears likely that the scheme is able to provide the level and form of affordable housing currently proposed. However this form and level of provision would not be in full accordance with policy requirements as it would not accommodate the 60:40 mix expected by policy.

- Whilst it is difficult to accommodate shared ownership, affordable rent and private rent tenures within a single core arrangement, it is possible. Also, in this instance, the scheme has a second lift and stair core (serving an office) which could potentially be re-purposed to provide access to affordable rent units. Providing different tenures and especially affordable rent, will have a significant impact on the overall amount of affordable housing schemes can provide and early testing suggests that the overall amount of affordable accommodation could well reduce to around 25% - should a policy compliant tenure split of 60:40 (affordable rent/shared ownership) be provided. There are clearly options to be further explored between a full shared ownership offer and a fully policy compliant offer.
- Further testing on viability and affordable housing provision is required to identify an appropriate balance between the quantum and form/affordability of affordable housing. The applicant is testing a number of different affordable housing scenarios including whether all three tenures of accommodation (private, intermediate affordable and affordable rent) can be provided via a single lift core and whether the intermediate accommodation could include elements of discount market rent (also an intermediate product) at rental levels equivalent to affordable or social rent. Whilst officers consider that this is a route which is worth exploring, other elements of the tenure may also need to be replicated to ensure that this truly meets an equivalent housing need – such as eligibility criteria.

#### 5.4 Housing Mix

- The Croydon Opportunity Area Planning Framework (OAPF) policy suggests that this area should provide 45% of units as 3 bed units, as the area is considered to be a “fringe” area where mid-rise developments are more likely, which can more readily include family accommodation.
- The proposal only includes 11% 3 bed units, but all 2 bed units (which comprise 45% of the scheme) are 2 bed, 4 person units which provide some family accommodation.
- Officers consider this is acceptable given the type of building proposed, the position in emerging policies that 2 bed, 4 person units can provide family accommodation if necessary for the first three years of the plan and that the site is probably of limited attraction to families being located adjacent to a flyover.
- 10% of units are provided as wheelchair user dwellings, which is in line with policy requirements.

#### 5.5 Massing - Townscape

- The OAPF sets different height character areas with different approaches to massing. This area is defined as an “outer” area where *“In general, tall buildings are unlikely to be acceptable in the outer area. Site specific*

*circumstances and site history will have an important role to play in determining exact heights of future buildings in this area.*" The site is in close proximity to some existing tall buildings on Scarbrook Road (13 storey), 4 storey and traditional 2 storey terraced houses at the western side of the site.

- Officers are satisfied that a tall building can be accommodated on the site as long as the impacts on these properties and others, are satisfactory and that the overall impact on townscape and other receptors is acceptable. The proposed height, at 25 storeys, is significantly taller than other buildings in the area.
- Long distance views of the scheme do show that in views from the south, including some which are designated views or panoramas in policy documents, the building would appear separate to the main high rise townscape of Croydon and would be significantly visible. This is likely to give rise to some visual prominence which could well be acceptable, if the design and appearance is of an exemplary appearance. Further information is required (including views analysis) before this can be fully considered and determined.

## 5.6 Massing – Heritage

- To the south of the site is the Laud Road Local Heritage Area and to the north is the Old Town Masterplan area, which is a heritage led masterplan, containing parts of the Church Street, Croydon Minster and Central Croydon Conservation Areas. The Croydon Minster and the Old Palace are Grade I Listed. The Tudor Arch, located in the graveyard (itself a Locally Listed Historic Park and Garden) of the Minster is a Scheduled Ancient Monument and there are numerous Grade II Listed Buildings in the area including the Pumping Station, the Town Hall and various properties on Church Street.
- At the time of writing the report, insufficient testing has been carried out to be able to assess the impact on these very important heritage assets robustly. Consequently, officers are unable to draw conclusions as to the heritage impact of the scheme but consider it likely that the proposal would impact on heritage assets. Where less than substantial harm is caused, this can be balanced against public benefits of the proposal. In this instance, the provision of accommodation, provision of affordable housing and provision of a public route across the site are the public benefits the scheme would bring. It is crucial therefore that these public benefits are realised and maximised. The provision of a route would be of benefit in providing a safer and more direct route through the area and the scheme would provide a significant quantum of housing.
- Without the impact on heritage assets having been properly established through testing, the acceptability or not of harm caused and mitigation measures proposed cannot be established.

## 5.7 Design and Appearance

- The layout of the building on the site is supported, given that it would minimise the impact on surrounding properties and provide an opportunity for enhanced public realm at the junction with Wandle Road. Locating a residential entrance along Scarbrook Road would bring activity along the road which currently has

no frontage. Servicing being taken from the flyover side of the site is sensible but will require careful design of the service area.

- The proposed building is relatively broad, being approximately 35m by 20m. In order to minimise a large, slabby, appearance, the elevation has been broken down into four sections with recesses and a split level at the top. This is supported as an approach to emphasise the slenderness of the building and provide interest.
- The emerging design and appearance of the scheme aims to make use of the concrete frame of the building to establish an architectural rhythm, which is then broken down by a secondary frame to produce a tighter grid which gives benefits of reducing solar heating to the southern elevation and makes the spaces between vertical elements of a residential scale and suitable apertures for fenestration. This establishes a rhythm of piers and decks, with recessed glazed areas adding depth. In a brick of a suitable colour and texture, this is considered likely to give rise to a high quality of appearance.

Officers consider specific elements of design need to be further developed, as follows:

- The landscaped area onto Wandle Road (adjacent to the commercial entrance) needs to be further developed to balance defensive planting against openness and relate more closely to the building. The design of the public route across the site also needs to be developed further along with the proposed service area.
- The ground floor has low levels of activity to Scarbrook Road and a convoluted approach to the residential entrance, exacerbated by level changes necessary to overcome flood risk issues. Plant and storage areas should be as efficient as possible and the flexible use area connected to the residential lobby to increase activity.
- The flexible use area is currently ill-defined. If it is to operate as a standalone café unit, officers consider it is unlikely to be successful given the difficult location adjacent to the flyover and tall buildings.
- The top of the building should be more carefully defined and requires further development.
- The façade rhythm breaks down where the lower elements of the building and the main tower merge, with a number of different treatments thereby requiring further refinement. There are significant areas of “dead” frontage given over to plant and storage in visible areas of the building.
- The scheme needs to be able to accommodate a flue – associated with the future energy centre, which should be carefully designed.

## 5.8 Residential Amenity

The impact on residential amenity of neighbouring properties needs to be carefully considered given the proximity of the building to other homes. The key areas are:

- **Outlook and Privacy:** The nearest properties are the 4-storey flats to the north of the scheme on Scarbrook Road. The building has been located between these buildings to minimise the impact. These units generally have outlook in

two directions and corner windows, which allows the impact in outlook terms to be acceptable, given the context of a built up Metropolitan Centre. Privacy is maintained by a separation across Scarbrook Road, which is a normal relationship between properties. The terraced homes on Salem Place and Church Road would not be affected.

- Daylight and Sunlight: The same Scarbrook Road properties would be those most affected and the location of the tower again minimises the impact. Given the siting to the south any development would have an impact on levels of light enjoyed by these properties, which is currently very high given the undeveloped nature of the site. A comparison between the impact of a typical 4-storey plinth block and the proposal has been undertaken which shows that whilst some impacts would be worse, others would be better. This is considered likely to be acceptable, subject to detailed testing and a flexible interpretation of BRE Guidance – as suggested in urban, high density character areas
- Wind: No wind testing has yet been carried out and the proposal could potentially impact on both residences and the public realm. The scheme must ensure that spaces meet the comfort standards advised by the BRE. There are often opportunities to minimise this impact in the detailed scheme design.
- Noise: There is potential for the scheme to shield some properties from the noise of the flyover, which would be beneficial. It is unlikely that the proposal would reflect noise directly towards other properties in a significant manner. Plant can normally be adequately screened.

The quality of accommodation for future residents needs to be carefully considered. The key areas are:

- Internal Unit Sizes: all units meet the Nationally Described Space Standards and sizes set out in the London Plan.
- Private Amenity Space: due to the environment of the site, in close proximity to the Croydon Flyover, the scheme proposes to provide winter gardens for units as opposed to balconies due to noise and air quality concerns. These would all meet or exceed the space standards set out in the London Plan and other policies. Given the site constraints, officers consider this is the best approach to take, as long as the winter gardens offer a genuinely semi-external area. High quality precedents have been provided to demonstrate the proposed approach.
- Communal Amenity Space: Local and London Plan policy requires schemes to deliver high quality communal amenity space for residents which should include spaces designed for children to play. No such spaces have been identified to date which again might be challenging to provide externally, in view of the relationship to the flyover and areas of poor air quality.
- Outlook, Light and Internal Layout: Units would generally have dual aspect, being located around the corners. There are two single aspect units on a typical floor, facing towards the flyover (south east) and so would have adequate light. Lower levels do have more single aspect units but the overall number is considered appropriate. The number of units served off a core is generally six, which is considered acceptable.
- Overheating: With a significant number of south and south-east facing units, units would need to be designed not to overheat. The depth of the façade has

been designed to reduce this issue through natural shading and provide solar control. The applicant considers that they can adequately manage this issue through the use of specialist glazing and mechanical ventilation.

- Noise: Given the site location, noise will be a key issue. Residential units should internally achieve noise levels in accordance with World Health Organisation guidelines. The applicant has indicated that this can be achieved through fixed shut windows which is acceptable, assuming that satisfactory mechanical ventilation measures are utilised.
- Air Quality: Similarly, due to the local environment, windows should be closed to respond effectively to air quality issues. This would also necessitate the use of mechanical ventilation and filters to remove NO<sub>x</sub> particles. The applicant has indicated that these would be fitted to all units. This is an issue which is still under discussion, given the practical difficulties in ensuring that these measures are suitably effective at managing the air quality and associated health impacts.

## 5.9 Highways and Parking

- The site is an existing car park which is used during the day, (Monday to Friday as a private carpark - for Council staff - and is available on a pay and display basis outside of this time). The site is also the location of a fleet of car club hire cars.
- The applicant has undertaken a parking accumulation study to demonstrate that the loss of car parking spaces would not have a significant impact on the viability of the Metropolitan Centre and the surrounding highway network. The OAPF sets out a managed reduction in the amount of car parking in the Opportunity Area. Given that only part of the car park is proposed to be developed, Zipcars and other related car club vehicles will be able to temporarily park on other parts of the site.
- Detailed design of the accesses and egresses has not been undertaken to date, but it is considered likely that these can be suitably designed.
- Given the location of the site, nil provision of residents parking is considered appropriate, apart from disabled parking, which is proposed to be provided at 1:1 ratios with units. This is considered acceptable, subject to restricting access to residents' car parking permits, provision of sustainable travel measures such as a residential travel plan, car club spaces and membership and a delivery and servicing plan.

## 5.10 Sustainability

- Policy requires that major developments are designed in accordance with the London Sustainable Design and Construction SPG and achieve, for residential elements, a zero carbon development and that non-residential elements achieve a 35% reduction in carbon and meet BREEAM Excellent.
- The applicant has indicated that these can be met through on-site measures and that carbon-offsetting may be required for the residential elements.
- The site is partially at risk of flooding, so the scheme proposes a raised floor level to mean that the building would not flood internally. This is considered likely to overcome this risk and safe access and egress can be taken from the part of the site not at risk.

- The site is also at risk of groundwater flooding and no details of measures to overcome this or provide SuDS to reduce run-off rates to below green-field (previously undeveloped) rates, as required by policy, have been submitted.

## **6. PRELIMINARY CONCLUSIONS**

- 6.1 The site is allocated for residential uses, amongst others, so the principal of the development is supported, but it must be demonstrated that the other uses can be accommodated properly on site.
- 6.2 Discussion on viability is still ongoing but officers are keen to further explore options to include a range of affordable housing tenures whilst seeking to secure as much affordable housing (in terms of overall percentage). Providing affordable rent or intermediate rental units at higher discount levels might well reduce the overall amount of affordable housing but would more closely accord with policy and help meet a wider range of affordable housing needs. This is an area the applicant is currently investigating and Members will be updated as part of the presentations.
- 6.3 Insufficient information has been submitted, at the time of report writing, to quantify the impact of the massing in heritage and townscape terms. This is crucial given the expected impact on listed buildings and their setting. Again, this is currently being discussed with the applicant and more detail should be available as part of the presentation.
- 6.4 Whilst the scheme would have an impact on surrounding occupiers in terms of daylight and sunlight, this is likely to be acceptable given the context. The wind impacts need to be quantified.
- 6.5 The residential amenity for future occupiers would be affected by noise and air pollutants from the flyover. This is likely to be successfully tackled by mechanical ventilation but officers need to ensure this approach is sufficiently robust.
- 6.6 The design and appearance of the scheme requires further refinement to both elevations and ground floor layout.
- 6.7 Whilst discussions with the applicant have been positive with proper consideration of the issues raised, it is difficult to draw firm conclusions on some issues, in view of the information currently available, with the most significant issues being affordable housing, massing/heritage impacts and quality of internal accommodation.

## **7 SUMMARY OF COMMENTS FROM PLACE REVIEW PANEL**

- 7.1 The following comments were made when the Place Review Panel reviewed the scheme on the 27<sup>th</sup> October 2017:

*The panel thanked the applicant team for presenting the proposed scheme. Although aspects of the scheme are supported by the panel it requires significant further development and testing before it can be fully supported. The panel has the following key observations and recommendations:*

- *The site is very challenging in terms of the necessary noise and air pollution mitigation requirements due to the proximity of the A232 and The Flyover.*
- *Further information is required to assess the scheme's impact on heritage assets in and around the Old Town areas including The Croydon Minster (Grade I Listed), The Old Palace (Grade I Listed), the Pumping Station (Grade II Listed), Conservation areas in Old Town including The Minster Conservation Area and Laud Street Local Heritage Area. Based on the information supplied to the panel, at its currently proposed height, it is possible that the scheme would have a detrimental impact on views from and of these heritage assets and their settings*
- *The panel is very concerned about the proposed use for and design of the ground floors. It questions the viability of the proposed office space and strongly opposes the amount of unarticulated wallspace which would deaden the neighbouring public realm*
- *The building will necessarily be very expensive to construct due to the deep reveals proposed to assist with mitigating solar gain, noise insulation and the air filtering system requirements for air pollution – all of which are supported by the panel*
- *Whilst the articulation of the facades to break up the massing is supported this won't read from a distance if the sun is behind the building therefore the profile and silhouette of the building needs also to be carefully designed*
- *The panel has significant concern about the internal noise, maintenance, use in practice by residents and associated expense of the air filtering system that will be required to mitigate the air pollution from the neighbouring A232 and Croydon Flyover*
- *More information on how the flue for the proposed neighbouring energy centre will be incorporated in to the architecture is required as this could be significantly taller than the proposed building and will be a prominent architectural feature*
- *The quantity of both internal and external communal amenity space for the hundreds of residents that the building will accommodate is too low. Some external community space could be located on the rooftops of the buildings. Potentially a gym, a basketball court and/or a rooftop restaurant could be accommodated in the building*
- *Wind testing is essential and is likely to inform the form of the building*
- *The panel recommends that all flats include windows that can be opened for internal amenity*
- *The few entrances that there are to the building should be generous in size and welcoming which will help activate the frontages*
- *The balustrades could be lowered from 1100mm to 800mm to improve views from within the flats from sitting positions*
- *The deep reveals will create comfortable locations for pigeons which should be mitigated against*
- *The applicant should be mindful of the rapidly changing fire safety regulatory environment for towers and that RIBA recently recommended that towers should have two cores*
- *The top of the building requires design development to strengthen its character and profile given it will be highly prominent*

- *The winter gardens must be generous and attractive spaces and include sufficient space for furniture*
- *Control to the service lane should be considered, given this is likely to be a space that could attract anti-social behaviour due to the blank frontage it faces.*
- *The individual flats will be expensive to maintain due to the air filtering requirements and therefore it is considered appropriate to locate affordable-rent accommodation on a different Brick by Brick site.*