

1 APPLICATION DETAILS

Ref: 21/02431/FUL
 Location: Development Site, Former Site Of 17 - 21 Dingwall Road, Croydon, CR0 2NA
 Ward: Fairfield
 Description: Full planning application for development ranging in height from 9 (ground plus 8 levels) to 28 storeys (ground plus 27 levels), containing 199 residential units, a healthcare facility (Use Class Ee), disabled car parking spaces, cycle parking, and associated amenity space, hard and soft landscaping.
 Drawing Nos: See Appendix 1
 Applicant: Bellway Homes (Thames Gateway) Ltd
 Agent: Savills
 Case Officer: Samantha Dixon

Housing Mix							
	1 bed	2 bed	3 bed	TOTAL UNITS	Total habitable rooms	Unit %	H/R %
Existing							
Proposed (market housing)	98	63	18	179	457	90	91
Proposed (shared ownership)	17	2	1	20	44	10	9
TOTAL	115	65	19	199	501	100	100

Type of floor space	Amount proposed SQM (NIA)	Amount proposed SQM (GIA)
Residential (Class C3) Units	12,182.2	17,892.3
Healthcare facility	1,186.1	1,294.4
Total	13,368.3	19,186.7

Vehicle and Cycle Parking (London Plan Standards)		
PTAL: 6B		
	Required standard	Proposed
Residential Car Parking	Minimum 6 x Disabled persons bays	2 x Disabled persons bays
Residential Long Stay Cycle Storage	Minimum 341 bays	324
Residential Short Stay Cycle Storage	Minimum 6 bays	8

Healthcare parking	Disabled persons bays - 6% of total parking provision	1 x Disabled persons bay Ambulance bay
Healthcare Long Stay Cycle Storage	Minimum – 1 space per 5 FTE staff	6
Healthcare Short Stay Cycle Storage	Minimum - 1 space per 3 FTE staff	6

This application is being reported to committee because it is for the erection of a building or buildings with a gross floor space of 10,000 square metres or more.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission
- 2.2 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission subject to:
- A. Any direction by the London Mayor pursuant to the Mayor of London Order
- B. Prior completion of a legal agreement to secure the following planning obligations:

Housing

- a) Affordable housing – 20 x C3 Use Class residential units (10%)
- b) Affordable housing review mechanism (early and late-stage review)

Transport and Public Realm

- c) Public realm strategy
- Delivery of on-site public realm works (i.e., walkway to same standards as off-site works, planting of trees, access to public, maintenance of it)
 - Provision of pedestrian route through the site (if Southern House is redeveloped in the future) - stipulation of hours that the gate will be open.
 - Landscaping and Public Realm management and maintenance strategy.
- d) Sustainable transport contribution of £199,000
- Off-site public realm improvements to be covered under Section 278 (upgrading, any cycle lane amendments as a result of the development, access, reconstruction of footways adjacent to the site, installation of road markings and associated traffic orders if applicable (all costs borne by developer including public realm maintenance commuted sums).
- e) TfL financial contribution of £110,000 towards improvements and upgrades to the local public transport network
- f) Travel Plan monitoring for 3 years and monitoring (fee of £2,269 included within sustainable transport contribution above)
- g) Car club membership
- h) Remove access for future residents to CPZ permits and season tickets for Council car parks
- i) Off-site highway works s.278 Agreement to cover all associated highway works to facilitate development

Design

- j) Retention of scheme architects

Environmental Impacts

- k) Air quality financial contribution of £19,900
- l) Carbon offsetting contribution, estimated at £338,854
- m) Future district heat network connection - District energy scheme
- n) TV signal mitigation

Employment and Training

- o) Local Employment and Training strategy (LETS). Financial contribution of £141,500 for construction phase. 20% of the jobs created from the commercial activity should be filled by Croydon residents
- p) Tram Safeguarding Zone retaining a clear four metre zone alongside Dingwall Road, to allow for the future expansion of the Tram Network;

Other

- q) Monitoring fees (£1500 per obligation)
- r) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.

2.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

Standard

- 1) Commencement time limit of 3 years
- 2) Carried out in accordance with the approved drawings

Pre-commencement

- 3) Submission of a Construction Stage Construction Environmental Management Plan
- 4) Submission of a Construction Logistics Plan
- 5) Contaminated land remedial works and validation report to be submitted
- 6) Submission of details of aviation warning lights (including construction)
- 7) Submission of Air Quality Dust Risk Assessment

Prior to above ground floor works

- 8) Submission of typical façade materials and detailing
- 9) Submission of Public Art Strategy
- 10) Submission of details of public realm (including pedestrian route) and landscape design and management (to achieve minimum UGF of 0.4)
- 11) Submission of biodiversity enhancement strategy

Pre-occupation

- 12) Submission of details of building lighting scheme and CCTV
- 13) Visibility splays to car park access to be maintained.
- 14) Electric vehicle charging points for car parking to be provided
- 15) Submission of details of access routes and signage for pedestrians, cyclists and vehicles and security gates
- 16) Submission of a car park management plan

- 17) Submission of a delivery and servicing management plan
- 18) Submission of full details of cycle storage
- 19) Waste and refuse managements arrangements to be provided as per submitted details
- 20) Development to meet energy efficiency/carbon reduction targets as approved
- 21) Confirmation of PV Roof panels (or alternative renewables)
- 22) Submission of confirmation of Secured by Design certification
- 23) Vehicle Dynamics Assessment with hostile vehicle mitigation and anti-terrorist measures
- 24) Use of second floor commercial element for Use Class E(e) (medical services) only
- 25) Fitting out and submission of details of the internal layout of healthcare (in consultation with NHS and Met Police)
- 26) Submission of a building maintenance strategy including window cleaning
- 27) Thames Water – water network upgrades
- 28) Circular Economy post construction monitoring report to be submitted
- 29) Post Construction Whole Life-Cycle carbon Assessment template to be submitted
- 30) Sufficient ducting space for full fibre connectivity infrastructure

Compliance

- 31) Provision of parking bays as per submitted details
- 32) Accordance with wind mitigation measures
- 33) Accordance with Flood Risk Assessment and Drainage Strategy
- 34) Accordance with Air Quality Assessment
- 35) Accordance with mitigation outlined in Environmental Noise Assessment
- 36) Noise from air and plant units should not increase background noise
- 37) Development to meet 110 litre per day/per person water use target
- 38) Fire – compliance with Building Regulations
- 39) Accordance with Fire Statement
- 40) All dwellings to meet M4(2) and M4(4) accessibility standards as appropriate

Other

- 41) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

- 1) Granted subject to Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Code of practice for Construction Sites
- 4) Construction Logistics Plan associated informative
- 5) Highway informative in relation to s278 and s38 works required
- 6) Light pollution
- 7) Requirement for ultra-low NOx boilers
- 8) Thames Water – groundwater discharge and water pressure
- 9) Airport Safeguarding
- 10) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.5 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 2.6 That the Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the Central Croydon Conservation Area(s) as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.7 That, if within 3 months of the Planning Committee meeting date the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 The proposal is an application for full planning permission and includes the following:
- A residential led mixed-use development ranging in height from 9 (ground plus 8 levels) to 28 storeys (ground plus 27 levels), containing 199 residential units (115 x1 bedroom, 65 x 2 bedroom and 19 x 3 bedroom).
 - The frontage block provides a healthcare facility (Use Class Ee) (total area of 1026sqm), with access at ground floor to the main provision at second floor level.
 - The provision of 3 blue badge car parking spaces at ground floor accessed from Dingwall Road (2 for the residential element and 1 for the healthcare facility)
 - Ambulance bay on site
 - Associated integral cycle parking and refuse stores for both residential and healthcare elements
 - Provision of a communal amenity space areas totalling approximately 746sqm comprising a garden (275sqm) at third floor podium level, amenity areas at level 17 of the frontage block (115 sqm) and at roof level of both towers (205sqm and 151sqm). In addition, a resident's flexible lounge (approximately 70sqm) is provided at third floor level and a resident's gym (110.9sqm) on the first floor of the front block.
 - Associated hard and soft landscaping
 - Provision of public realm improvements, including fronting onto Dingwall Road and the formation of a shared surface pedestrian route through the site that would allow for a future public access route through to Southern House.



Figure 1: Visual and proposed development from Dingwall Road

Amendments

3.2 During the course of the application amended plans have been received. From initial submission to the current scheme, the amendments are as follows:

- Increased height of frontage tower from 25 to 28 storeys
- Increase number of residential units from 197 to 199
- Inclusion of healthcare facility on second floor
- Raising central podium (amenity space) from second to third storey. Usable podium space increased as result.
- Alteration to ground floor layout to accommodate healthcare provision including alternate cycles stores (number and location), reduction of on-site parking bays (from 6 to 3 blue badge bays), inclusion of ambulance parking bay
- Inclusion of gate in the undercroft to improve safety within the site and gates to the rear boundary
- Increase in size of the window openings in the rear elevation of Block 2 to improve light levels to proposed units
- Design alterations to facades including; increase in depth of brick 'fins' on frontage, alteration to brick treatment around side facing windows, alteration to use of materials to form the base
- Inclusion of second stair core in both blocks to accord with forthcoming Building Regulation requirements.
- Alteration to Unit Mix as a result of the inclusion of the second stair core
- Reduction in affordable housing offer as a result of; increased building costs, inclusion of healthcare facility, inclusion of second stair core.

3.3 Reconsultation has taken place in full.

Site and Surroundings

- 3.4 The site is a rectangular parcel of land, approximately 0.2 hectares in area and is located on the western side of Dingwall Road opposite the Ruskin Square development and in close proximity to East Croydon Station. The site is roughly level. The site previously comprised a two-storey building which was used as a job centre. The site had vehicle access from Dingwall Road. Planning permission was previously granted for a tall building on the site (see history below), which has been implemented and is a material consideration. The site has been cleared and is currently surrounded by temporary hoardings.
- 3.5 The surrounding area contains a mix of commercial and residential uses. Immediately to the north of the site is Carolyn House which comprises 22 storeys of residential development as its closest point to the application site. Connected to the rear of Carolyn House is a Premier Inn Hotel accessed from Lansdowne Road and also abuts the application site to the north. Immediately to the south of the application site is Renaissance House which comprises 5 storeys of office accommodation. Southern House directly to the rear provides office accommodation and is accessed primarily off George Street by pedestrians (with vehicular access from Walpole Road to the west).
- 3.6 To the eastern side of Dingwall Road is the construction site for the evolving Ruskin Square development, which once completed will introduce 11 buildings ranging from 11 to 22 storeys providing a mix of residential, office, retail and community uses. Directly opposite the application site is the new Home Office building which is substantially complete.
- 3.7 Other large-scale residential led mixed-use developments within close proximity to the site include Cambridge House (to the west of the site on Wellesley Road) and Ten Degrees (100a George Street). There is an extant permission for 1-5 Lansdowne Road and 30-32 Wellesley Road which comprises a 68-storey tower. A revised application has also been submitted at this site which comprises a 48-storey tower and is currently under consideration.

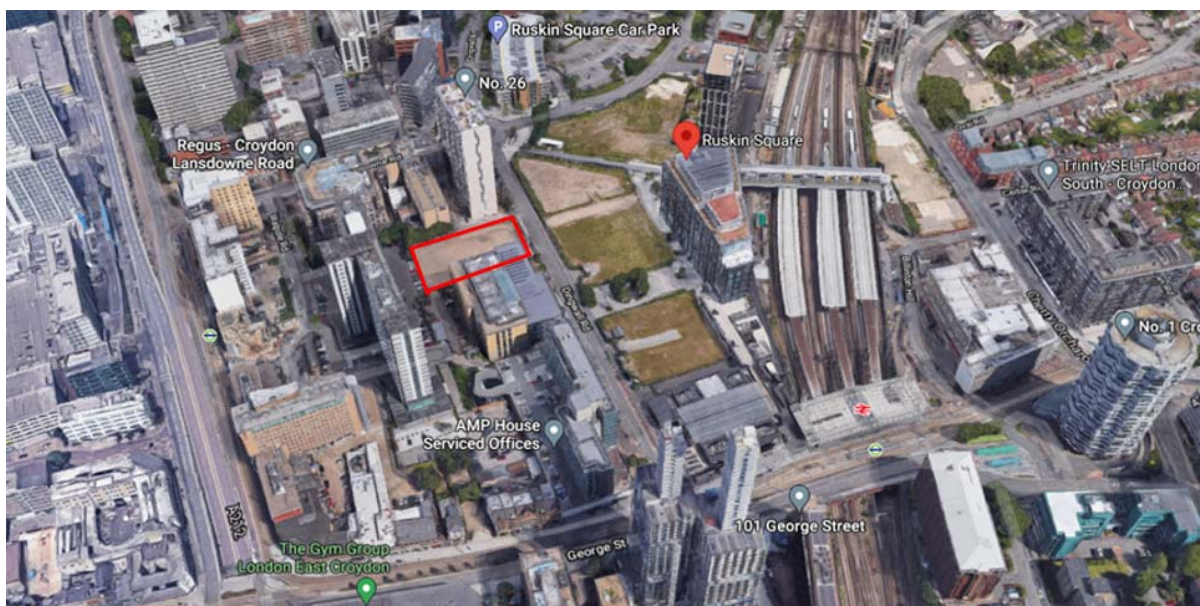


Figure 2: Aerial photo of the site

Planning Designations and Constraints

3.8 The site is subject to the following formal planning opportunities, constraints and designations:

- PTAL: 6B
- Flood Risk Zone: 1 (low risk)
- Croydon Metropolitan Centre
- Croydon Opportunity Area
- Place Specific Policy Area/Proposal Site (Local Plan Policy DM38) - Site Allocation 186 for offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if required by the NHS)

Planning History

Application site

3.9 The following planning decisions are relevant to the application:

17/06327/FUL Full planning application for a residential-led mixed use development ranging in height from 9 (ground plus 8 levels) to 24 storeys (ground plus 23 levels), containing 181 residential units (86 no. 1 bed units, 81 no. 2 bed units, 14 no. 3 bed units) with flexible commercial space at ground, first and second floor level, 8 no. disabled access car parking spaces, cycle parking, and associated amenity space, hard and soft landscaping. **Approved** 30.10.2018 [Pre-commencement conditions discharged and CIL paid. Demolition works complete and groundworks including piling have been undertaken, however above ground works not implemented]

19/01315/NMA Non-material amendment to planning permission 17/06327/FUL to change the external appearance of the building facades and material palette. **Approved** 15.04.2019

19/03611/NMA Non-material amendment to planning permission 17/06327/FUL to alter the basement, ground and first floor layouts to accommodate the revised energy strategy resolving operational and technical detailed design requirements, alterations to both stair and lift cores, additional communal space at floor 09 and amended balcony/window detailing at Floors 01, 22 and 23). **Approved** 11.02.2020

20/05007/NMA Non-material amendment to planning permission 17/06327/FUL to change podium height for fire engine access. **Approved** 08.02.2021

There have been a number of applications to discharge conditions imposed on 17/06327/FUL.

Neighbouring Sites

Carolyn House

3.10 (LBC Ref 16/02458/P) – Erection of a 4 and 6 storey rooftop extension (38 apartments), change of use of Floors 2 and 8 from office to residential use (20 apartments) along with a part change of use of ground floor to form two

cafe/restaurant (Class A3) units, a part first floor communal co-working space, ground floor front extension and 2 storey rear extension, alterations to elevations, along with public realm improvements, associated parking and ground floor A3 use and residential entrance lobby. Permission Granted in April 2017 and completed on site.

Renaissance House

- 3.11 (LBC Ref 12/01111/DT) Erection of a five storey office building (Class B1), with flexible Class A1, A2, A3, B1 space at ground floor; together with a new pedestrian route through the site, public realm improvement works, associated car parking and landscaping (amendment to planning permission LBC Ref 12/00404/P). Permission granted in May 2012 and completed on site.

Ruskin Square

- 3.12 Ruskin Square has been subject to several planning applications as part of a phased redevelopment. Those most relevant to the proposed development are:
- 3.13 (LBC Ref 11/00631/P) The erection of five buildings with a minimum floor area of 53,880 sq metres and maximum of 62,080 sq metres to provide a minimum of 550 and a maximum of 625 residential units; erection of 6 buildings for Class B1 use for a minimum of 88,855 sq. metres and a maximum of 151,420 sq. metres; provision of a minimum of 7,285 sq. metres and a maximum of 10,900 sq. metres of retail (class A1-A5 floorspace); provision of a maximum of 400 sq. metres of community use (class D1); provision of a replacement theatre of 200 seats; provision of energy centre and estate management facilities; formation of vehicular accesses and provision of pedestrian routes public open space and car parking not to exceed 256 parking spaces. Permission granted in March 2012 and the first residential and commercial phases are now complete and occupied. Work onsite is on-going.
- 3.14 LBC Ref 20/01503/CONR (This includes the Home Office building) Application for development without compliance with conditions 7 (approved plans), 71 (B04 wind mitigation), 72 (B04 design details), 73 (B05 reveal depths) and 74 (B05 design details) subject to which previous planning permission 11/00631/P (The erection of five buildings with a minimum floor area of 53,880 sq. metres and maximum of 62,080 sq. metres to provide a minimum of 550 and a maximum of 625 residential units; erection of up to 6 buildings for class B1 use for a minimum of 88,855 sq. metres and a maximum of 151, 420 sq. metres; provision of a minimum of 7285 sq. metres and a maximum of 10,900 sq. metres of retail (class A1-A5 floorspace); provision of a maximum of 400 sq. metres of community use (class D1); provision of a replacement theatre of 200 seats; provision of energy centre and estate management facilities; formation of vehicular accesses and provision of pedestrian routes public open space and car parking not to exceed 256 parking spaces) was granted to allow for a revised office building across plots B04 and B05. (This application is accompanied by an Environmental Statement Addendum). Permission granted in June 2020. Work onsite is on-going.
- 3.15 LBC Ref 15/01289/RES Erection of a fifteen storey building comprising office use (class E(g)(i)) and commercial, business and service uses (classes E(a)-(d)); pub and drinking establishments (including those with expanded food provision) and takeaways (sui generis); and community and learning uses (classes E(e)-(f), F.1(a)-

(e) and F.2(a)-(b)) at part ground and part first floors along with parking (approval of reserved matters in connection with outline planning application 20/01503/CONR in relation to Plot B02)

3.16 1-5 Lansdowne Road and Voyager House, 30-32 Wellesley Road

LBC Ref 17/03457/FUL – Demolition of the existing buildings and the erection of a part 11, part 41, part 68 storey development comprising 794 residential units (Use Class C3), 35,000 sqm (GIA) of offices (Use Class B1a), retailing / restaurant / bar uses (Class A1 / A3 / A4 and/or A5), public viewing gallery, swimming pool and gym (Use Class D2), with associated access and servicing, car / cycle parking, landscaped pedestrian walkways and public plaza. Permission granted in October 2017. Extant permission however no works have commenced on site.

LBC Ref 23/02689/FUL Demolition of existing buildings and erection of mixed use development comprising of office (Use Class E (g)), maximum of 783 residential units (Use Class C3), and retail uses (Use Class E) across two tall buildings (Tower A with a maximum height of 48 storeys and Tower B with a maximum height of 35 storeys), with associated landscaping, access, cycle and car parking and other associated works. Pending consideration

Cambridge House, 16-18 Wellesley Road

- 3.17 (LBC Ref 16/03368/P) - Demolition of existing buildings; erection of 26 storey building with double height ground floor plus basement level comprising 63 two bedroom, 20 one bedroom and 9 three bedroom flats; provision of access, landscaping and 3 parking spaces. Permission granted March 2017. Work onsite is on-going.

100a George Street (Former Essex House / “Ten Degrees”), George Street, Croydon

- 3.18 (LBC Ref 17/04201/FUL) - Redevelopment of the site to provide a part 38 and part 44 storey building with 546 residential flats, with the ground floor to incorporate a flexible space including retail (Class A1), cafe (Class A3), business space (Class B1) and gallery space (Class D1) uses with basement accommodating parking spaces, cycle storage and refuse storage, and associated hard and soft landscaping. Permission granted in February 2018 and completed on site.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 4.1 In summary, the officer recommendation has been informed by the following:

- The principle of the redevelopment of this site has already been established, bringing forward the regeneration of a vacant site.
- The provision of C3 residential use is fully supported.
- The amended scheme includes the provision of a much-needed healthcare facility in Central Croydon, in accordance with the policy site allocation.
- 20 affordable units in the form of Shared Ownership (equating to 9% by habitable room) which has been independently assessed as the maximum reasonable provision.
- The proposal includes 19 x three-bedroom units (9.5%) which roughly aligns with Policy requirements (10%).

- Against the backdrop of the 17/06327/FUL permission, a tall building is supported. The height and mass of the building has been assessed in relation to its impact from a wide range of viewpoints and found acceptable, including in relation to its impact on heritage assets.
- As amended, the design, appearance and detailed façade treatment of the development is of high quality as required for tall buildings.
- The future provision of the through route to Southern House is supported.
- The living conditions of adjacent occupiers would be protected from undue harm.
- The living standards of future occupiers are satisfactory (in terms of overall residential quality), and the homes would comply with the Nationally Described Space Standard (NDSS).
- On balance, the quantum of parking and impact upon highway safety and efficiency would be acceptable, subject to conditions and s.106 agreement.
- The environmental impacts, including wind, noise, air quality, land contamination and flooding, are acceptable subject to mitigation proposed through a combination of conditions and s.106 agreement.
- Sustainability aspects have been properly assessed and their delivery can be controlled through planning obligations and planning conditions.

4.2 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

5.2 The following were consulted regarding the application:

The Greater London Authority (Statutory Consultee)

5.3 The GLA have made the following comments at Stage 1. N.B. the comments refer to the originally submitted plans and documents, which will be considered by the GLA at Stage 2:

- Land use principle: The residential-led redevelopment of this allocated site within the Croydon Opportunity Area is supported in principle.
- Housing: The affordable housing offer comprises 21% affordable housing (by habitable room) with a tenure split of 38% low-cost rent to 62% intermediate. The proposal would increase the quantum of residential units on the site but maintains a similar level of affordable housing as per the extant scheme. This level of affordable housing falls significantly short of the 35% threshold and in the absence of a verified viability position is unacceptable. *(Officer note, the amount of affordable housing has since been reduced, partially as a result of floorspace being given over to a healthcare facility but following independent appraisal it has been demonstrated that it would not be financially viable to increase this. 2x financial reviews are to be included in the s.106 agreement to ensure additional profit is translated to affordable housing).*
- Urban Design: The application site is situated within an appropriate location for a tall building. While the design of the scheme is broadly supported, a townscape and visual study is required to fully assess the visual impacts of the proposed building. Further information is also required to address the

functional and environmental impacts of the tall building. The applicant should also address the concerns raised in relation to residential quality and the ground floor layout.

- Transport: Further information is required on trip generation and modal split, while the quantum of cycle parking needs to be increased. A financial contribution is also required towards public transport network improvements. The provision of electric vehicle charging points, construction logistics plan, delivery and servicing plan, travel plan, parking permit restriction and cycle parking design should also be secured by condition or S106 agreement
- Sustainable Development: Further information on various components of the energy strategy is required before the expected carbon dioxide reductions and overall savings can be confirmed. Additional information is also required in relation to whole life-cycle carbon.

Transport for London (Statutory Consultee)

5.4 There have been several rounds of amendments to the layout and Transport Assessment. The comments below relate to the latest amendments:

- Pedestrian Access - The applicant has incorporated a clear route for pedestrians from Dingwall Road to the Block 2 entrance. It should be confirmed that the entire route will be raised, and the provision of lighting and wayfinding should be secured.
- Healthcare facility cycle parking – Six long stay cycle parking spaces are proposed in the form of three Sheffield Stands. This is based on 30 staff on site at any one time and is accepted. Access to the spaces should be well-lit. Showers and lockers will be provided for staff which is welcomed, though the location of these should be confirmed.
- Residential cycle parking – A total of 324 long stay spaces are proposed. This is a shortfall of the minimum amount required by London Plan policy by 17 spaces. 4 of these spaces will be designed to accommodate larger or adapted cycles. At least 20% should comprise Sheffield standards (68 spaces), and a further 5% should be for larger cycles (17 spaces). Given the amount of disabled persons parking proposed, it is important to ensure there are other opportunities for non-car travel. The applicant should increase the amount of cycle parking to cater for larger and non-standard cycles.
- A further 14 visitor cycle spaces are proposed within the public realm which are accepted.
- Disabled persons car parking - 3 disabled person spaces are proposed which will include 2 for residents and 1 for the health facility. Given the high PTAL this can be accepted, however this should be supported with evidence that alternative options are suitable.

[OFFICER COMMENT: East Croydon Station, West Croydon Station, and the nearby Tram and Bus Stops all provide step-free access. The amount of cycle parking has been increased]

- The ability for drop-off to take place on site has been removed, in support of non-car modes. Financial contributions could secure improvements to the walking routes in the area. At least 5% of the proposed long stay cycle parking should be able to accommodate larger or adapted cycles.
- Public transport mitigation - Financial contribution of £110,000 (calculated using trip generation forecast) must be secured towards public transport enhancements in the locality of the development.
- Deliveries and servicing – Vehicle swept path analysis confirms that a standard refuse vehicle and ambulance, as well as more than one smaller delivery vehicle can access and turn within the site. A 10m rigid vehicle is not able to turn without overrunning the footway route which will be used by pedestrians.

Lead Local Flood Authority (LLFA) (Statutory Consultee)

- 5.5 The LLFA have no objection (further information was received to address initial concerns). The submitted strategy and overall approach generally meet LLFA requirements and demonstrates that appropriate SuDS measures have been considered and implemented where feasible.
- 5.6 Comments on amended plans - The updated Flood Risk Assessment/Drainage Strategy report confirms that although the proposed development mix, floor plans, and building heights have changed, there is no change to the impermeable areas or surface water drainage strategy proposed previously.

Environment Agency (Statutory Consultee)

- 5.7 Due to the scale, nature and setting of this proposal and the supporting information submitted, the Environment Agency has assessed this proposal as low risk and has no specific comments and provided advice with regard to contaminated land and sustainable drainage.

Historic England - Heritage

- 5.8 No comment

Historic England – Archaeology

- 5.9 The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary.

Health and Safety Executive (HSE)

- 5.10 Became a statutory consultee on 1st August 2021 and does not comment on planning applications submitted prior to that date.

Natural England

- 5.11 No objection

Thames Water

- 5.12 No objection with regard to surface water network infrastructure capacity or foul water sewerage network infrastructure capacity. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal and as such recommend a condition to ensure water network upgrades are made. Recommends informatives with regard to public sewers, oil interceptors and development within 15m of underground water assets.

Network Rail

- 5.13 No objections

Metropolitan Police Service – Designing Out Crime Officer (DOCO)

- 5.14 Initial concerns were raised with regard to the permeability of the building and the external space. Internally, the building needs to be security compartmentalised as much as possible, with residents only being able to gain access to floors/blocks in which they live, through the use of smart lifts and stairwell access control. Outside amenity areas should incorporate defensible space around private apartment windows and doors. Externally, the public walkway through to Southern House leads to the undercroft parking/servicing area which has no natural surveillance and therefore could attract criminal activity. Concerns were also raised with regard to the security of cycle stores. Requirement for external lighting and CCTV
- 5.15 The applicant has made amendments to address said concerns. The development will now be gated to prevent public access. Were through access to Southern House required in the future, access times would be controlled. Internally, access control measures will be utilised. Cycle stores have been compartmentalised and access arrangements altered. The DOCO is satisfied with the amendments that have been proposed. A condition will be imposed to ensure the development meet Secure by Design standards and for lighting and CCTV details to be provided.

National Air Traffic Services (NATS) Safeguarding

- 5.16 No comment received

Gatwick Airport Safeguarding

- 5.17 No objection raised as the proposal does not conflict with safeguarding criteria.

Heathrow Airport Safeguarding

- 5.18 No safeguarding objections to the proposed development. Advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane.

London Biggin Hill Airport

- 5.19 This development will not affect the Airport Safeguarding regulations and therefore will not impact the safe airport operation.

London Fire Brigade

5.20 No comments received

Building Control (fire)

5.21 Reviewed the proposal and raised no objections to the planning application.

6 LOCAL REPRESENTATION

6.1 A total of 277 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of one or more site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 2 Objecting: 1 Neutral: 1 Supporting: 0

No of petitions received: 0

6.2 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

Objection	Officer comment
Environmental	
The contamination risk posed by Asbestos has not been properly quantified or assessed.	Contamination assessed below.
Transport and Highways impacts	
The impact on traffic/highways during construction and later, operation of the building will be significant on a busy one-way road.	A Construction Logistics Plan will be required by condition in order to minimise any highways issues during construction.
Use	
Loss of commercial unit	Given the site allocation, there is no in principle objection to the loss of the commercial unit. Principle of development addressed below in full
Healthcare needed in the area due to number of tower blocks, though amenity/resident space' also needed.	Noted. Amenity space addressed below in full.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- GG1 Building Strong and Inclusive Communities
- GG2 Making the Best Use of Land
- GG3 Creating a Healthy City
- GG4 Delivering the Homes London Needs
- GG6 Increasing Efficiency and Resilience
- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D6 Housing Quality and Standards
- D7 Accessible Housing
- D8 Public Realm
- D9 Tall Buildings
- D11 Safety, Security, and Resilience to Emergency
- D12 Fire Safety
- D13 Agent of change
- D14 Noise
- H1 Increasing Housing Supply
- H2 Small Sites
- H4 Delivering Affordable Housing
- H5 Threshold Approach to Applications
- H6 Affordable Housing Tenure
- H7 Monitoring of Affordable Housing
- H10 Housing Size Mix
- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- E11 Skills and Opportunities for All
- HC1 Heritage conservation and growth
- HC3 Strategic and local view
- G1 Green Infrastructure
- G4 Open Space
- G5 Urban Greening
- G6 Biodiversity and Access to Nature
- SI 1 Improving Air Quality
- SI 2 Minimising Greenhouse Emissions
- SI 4 Managing Heat Risk
- SI 5 Water Infrastructure
- SI 7 Reducing waste and supporting the circular economy
- SI 8 Waste Capacity and Net Waste Self-Sufficiency
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T1 Strategic Approach to Transport
- T2 Healthy Streets
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car parking
- T7 Deliveries, Servicing and Construction
- T9 Funding transport infrastructure through planning

- DF1 Planning Obligations

Croydon Local Plan (2018)

- SP1 Place
- SP1.1 Sustainable Development
- SP1.2 Place making
- SP1.3/SP1.4 Growth
- SP2 Homes
- SP2.2 Quantities and locations
- SP2.3-2.6 Affordable Homes
- SP2.7 Mix of Homes by Size
- SP2.8 Quality and standards
- DM1 Housing choice for sustainable communities
- DM1.1 Provision of 3 or more beds
- SP3.6 Town Centres
- SP3.10 Flexible approach to commercial use in CMC
- SP3.14 Employment & Training
- DM4 Development in Croydon Metropolitan Centre
- DM4.2 Ground Floor Change of Use
- DM4.3 Mixed use developments
- SP4 Urban design and local character
- SP4.1-4.3 Urban Design and Local Character
- SP4.4 Croydon Opportunity Area
- SP4.5 -4.6 Tall Buildings
- SP4.7-4.10 Public Realm
- SP4.12-4.13 Character, Conservation and Heritage
- DM10 Design and character
- DM11 Shopfront design and security
- DM13 Refuse and recycling
- DM14 Public Art
- DM15 Tall and large buildings
- DM16.1 Promoting healthy communities
- DM18.1 Character, appearance and setting of heritage assets
- DM18.2 Proposals affecting heritage assets
- DM18.9 Archaeology
- SP6.1 Environment and climate change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable design and construction
- SP6.4 Flooding
- DM23 Development and construction
- DM24 Land contamination
- DM25 Sustainable drainage systems and reducing flood risk
- SP7.4 Biodiversity
- DM27 Protecting and enhancing our biodiversity
- DM28 Trees
- SP8 Transport and communications
- SP8.3-8.4 Development and Accessibility
- SP8.6 Sustainable Travel Choice – pedestrians
- SP8.7 Sustainable Travel Choice – cycle

- SP8.11 Land used for Public Transport
- SP8.12-SP8.14 Motor Vehicle Transportation
- SP8.15-17 Transport and Parking
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM32 Facilitating rail and tram improvements
- DM38.1 Croydon Opportunity Area – enable development opportunities
- DM38.2 Croydon Opportunity Area – positively transform
- DM38.3 Central Areas
- DM38.7 Site allocations (No.186)

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated September 2023, and accompanied by the online Planning Practice Guidance (PPG). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Achieving sustainable development;
- Delivering a sufficient supply of homes;
- Ensuring the vitality of town centres;
- Promoting healthy and safe communities;
- Promoting sustainable transport;
- Making effective use of land;
- Achieving well-designed places;
- Conserving and enhancing the historic environment

SPDs and SPGs

7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- London Housing SPG (March 2016)
- London Plan Guidance Housing Design Standards (June 2023)
- London Mayoral Affordable Housing SPG: Homes for Londoners (August 2017)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- National Design Guide (2021)
- Croydon Opportunity Area Planning Framework (adopted by the Mayor and Croydon) (2013)

8 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development
2. Affordable housing and housing mix
3. Townscape and visual impact
4. Quality of healthcare accommodation
5. Quality of residential accommodation
6. Impact on neighbouring residential amenity
7. Tree, Landscaping and biodiversity
8. Access, parking and highway impacts
9. Flooding
10. Environmental Impacts
11. Flood risk
12. Sustainable Design and Construction
13. Fire Safety
14. Other Planning Issues
15. Conclusions

Principle of development

8.2 At the heart of the National Planning Framework 2021 (NPPF) is a presumption in favour of sustainable development which meets social, economic and environmental needs, and attaches great importance to significantly boosting the supply of new housing.

8.3 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher annual target of 2,079 homes per year.

8.4 Croydon Local Plan Policy SP2.2 separates this target into three sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes as identified by specific site allocations for areas located beyond the Croydon Opportunity Area boundary and 10,060 homes delivered across the Borough on windfall sites. In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes.

8.5 The Croydon Opportunity Area Planning Framework (OAPF), which was adopted in 2013, sets out key strategic objectives for Central Croydon. This is focussed around the renewal and regeneration of the retail core, the delivery of new homes and jobs in high quality new development, with commensurate social infrastructure, public transport and public realm/high street enhancements.

8.6 The site is located within the Croydon Opportunity Area and Croydon Metropolitan Town Centre, where residential development is fully supported.

Existing Use

8.7 The site was previously occupied by a two-storey building used by the Job Centre (Use Class A2) which was demolished as a result of planning permission 17/06327/FUL

granted in October 2018. Apart from demolition and groundworks including piling, the approved development has not been constructed, and the site is currently vacant and not in use. The lawful use of the site remains for A2 uses, and the site is allocated in the Croydon Local Plan 2018 for offices and/or residential and/or hotel and/or replacement Class A2 (financial and professional services - with healthcare facilities, if required by the NHS).

Proposed Residential Use

- 8.8 The use of the site for residential purposes accords with the allocation in the Croydon Local Plan 2018 and is considered acceptable in principle. The proposal would deliver 199 residential units which would contribute to the borough meeting its annual housing targets.

Other Uses

- 8.9 The site allocation in the Croydon Local Plan 2018 proposes the use of the site as a healthcare facility (if required by the NHS). As originally submitted the scheme did not provide a healthcare facility. This was as per the previous consent at the site 17/06327/FUL whereby, at that time, the site did not fit the NHS's requirements. However, during consultation as part of the current application, the NHS confirmed their interest in use of this site for a healthcare provision.
- 8.10 After discussions with the NHS, the application has subsequently been amended to include the provision of a healthcare facility on the second floor of the building,. This space will have separate and direct access from the ground floor frontage. Whilst specific details with regard to internal layout are yet to be ascertained, the NHS has confirmed their general support for the proposal as submitted. This amendment is considered to be a significant benefit of the current scheme over the extant permission, providing a much-needed new medical facility in the centre of Croydon which will benefit not only the existing population, but also support population growth.
- 8.11 Whilst the proposed development would result in the loss of the site for A2 use (financial and professional services), that use is not explicitly protected by the development plan and is an acceptable use within the Site Allocation rather than one which must be delivered. The site would deliver an NHS facility instead. In addition to the community benefits offered by a new medical centre, this use would provide employment opportunities, and would result on the ground floor of the building having an "active frontage" and public facing ground-floor use; thereby delivering similar benefits to an A2 use.
- 8.12 Local Plan Policy DM4.3 requires development to demonstrate that a specified end user will occupy the building, or that a free fitting out will be provided for eventual end occupiers to ensure that the unit is capable of occupation and operation. A condition is recommended to secure this.
- 8.13 The development proposes the re-use of an existing underutilised site, in a highly sustainable location with a building which meets the standards set out in Development Plan policy and guidance. This approach accords with the core principles of the NPPF, which encourages the reuse of previously developed land in a sustainable location. In light of the priority given to the delivery of a significant number of new dwellings (particularly on underused brownfield sites) and the provision of a much-needed healthcare facility, the principle of the redevelopment of the site as proposed is supported and would fully comply with national and local plan policy.

Affordable housing and Housing mix

Affordable housing

- 8.14 Policy SP2.4 of the Croydon Local Plan 2018 seeks to negotiate to achieve up to 50% affordable housing, subject to viability and seeks a 60:40 ratio between affordable rented homes and intermediate homes unless there is agreement that a different tenure split is justified.
- 8.15 Policy 2.5 of the Croydon Local Plan 2018 requires a minimum provision 30% affordable housing unless not viable, in which case a minimum level of 15% affordable housing is required, plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units).
- 8.16 London Plan (2021) sets a strategic target for 50 % of all new homes to be affordable. Policy H5 sets a threshold approach to viability at a minimum of 35%.
- 8.17 London Plan Policy H6 refers to affordable housing tenure. The split should be a minimum of 30% low-cost rented homes as either London Affordable Rent or Social-Rent, a minimum of 30% intermediate products including London Living Rent and London Shared Ownership and the remaining 40% to be determined by the borough as low cost rented homes or intermediate products based on identified need; in Croydon this is the 60:40 ratio set out in Policy SP2.4.
- 8.18 It should be noted that as the London Plan (2021) was adopted after the Croydon Local Plan (2018), where there is a policy difference, the most recent adopted policy should take precedence.
- 8.19 The developer cannot meet the strategic level of affordable housing as sought by Policy H4 of the London Plan or SP2.5 of the Local Plan. The scheme proposes to provide 9% affordable housing on site by habitable room (10% by unit number). This includes 20 affordable units, all of shared ownership tenure. These units would all be located in the rear block.
- 8.20 The current application was first submitted in May 2021. The delay in determination of this application was firstly a result of the NHS's confirmation late in the application process of their requirement for a healthcare facility on this site, which led to the scheme being amended to include this facility. A second significant setback to determination occurred when the GLA announced that all tall buildings will need to be provided with a second stair core for fire safety purposes (upcoming changes to Building Regulation requirements). This led to a further internal redesign to accommodate this fundamental requirement, resulting in a change in the proposed housing mix (leading to a greater proportion of 1-bedroom units). These amendments (whilst necessary and provide some benefits to the scheme) have fundamentally held back determination of the application. In the time that has passed since the previous application was granted, and this application was first submitted, amongst other things, build costs and inflation have soared, mortgage rates and developer finance rates have increased, and property prices have dropped. In addition to the economic challenges, the scheme now includes the provision of the healthcare facility, and a second stair core is provided which results in higher build costs and less sales revenue.

- 8.21 The application has been subject to a financial viability appraisal (FVA), which has been scrutinised independently by Gerald Eve (GE).
- 8.22 The FVA suggests a Benchmark Land Value (BLV) for the site of £2m. GE disagrees with the applicant's assessment of the BLV. GE has assessed the value against market evidence and also used sensitivity analysis on costs and private sales values which indicates that relatively small changes in cost and value would enable a minimum site value of £950,000. The evidence presented by GE to come to the BLV is supported by officers, noting that the site is currently vacant.
- 8.23 Sensitivity tests have been undertaken which show that the proposed scheme is currently unviable and cannot provide any additional affordable housing. The conclusion (for both the applicant and GEs review) is that the scheme is in deficit. The applicant indicates a viability shortfall of £14.88m, the appraisal output suggesting 4.05% profit return on cost against a target of 22.5%. GEs independent review suggests a deficit position of c.£3.5m. The difference is main due to GE retaining their stance on the BLV (as above) and providing slight adjustments in the gross development value (GDV) of the private and affordable residential and commercial uses, as well as adjusting the target profit return in line with recognised standards.
- 8.24 Notwithstanding the differences in values/assessment between the FVA and GE, GE have found that the scheme generates a residual value which is below that of the BLV. Therefore, based on the evidence available, within the inclusion of s106/CIL contributions and other scheme costs, it would not be viable for the proposal to provide additional affordable housing.
- 8.25 As the amount of affordable housing proposed is less than required by planning policy, London Policy H5 (f) states that (non-phased) viability schemes will be subject to early and late-stage review mechanisms, which are recommended. This would capture any changes (for example increase in home prices/reduction in construction costs) which may result in increased affordable housing provision and/or contribution. GE have undertaken further sensitivity testing on base costs and private sales values which shows that a 5.0% increase in private sales values coupled with a 2.5% decrease in costs would make the Scheme viable compared to the BLV, as does a 2.5% increase in private sales values coupled with a 5.0% decrease in base costs. This level of variation is within a tolerable level of variance to potentially produce a viable position with shifts in market conditions over the lifetime of the scheme. As such the inclusion of the review mechanisms are of key importance. For clarity, officers adopt the deficit provided in the GE independent review for the purposes of the affordable housing review mechanisms. The s.106 agreement will also seek to ensure that where viable any increase in the amount of affordable housing also results in an improved tenure split. The detail of this will be finalised as part of the S106 Agreement.
- 8.26 Having regard to the independent assessment of viability, it is considered that the proposal accords with the objectives of the development plan policies as far as possible with regards to affordable housing provision. Officers are satisfied, following in-depth and complex assessment and negotiations, that the scheme is able to deliver this maximum reasonable level of affordable housing, whilst providing the healthcare facility, with opportunities to review viability further down the line.
- 8.27 The proposed amount of affordable housing would not comply with the requirement of Local Plan Policy SP2.5 to provide an absolute minimum of 15% affordable housing.

However, as explained above the London Plan policies take precedence and the proposal would comply with the NPPF's expectation (para 65) to deliver at least 10% affordable housing. Given the extensive viability testing, the potential to deliver additional affordable housing through review mechanisms, and previous appeal decisions on other sites which have required robust evidence to support refusal reasons, officers are satisfied that the proposed affordable housing has been robustly assessed and does not warrant refusal on affordable housing grounds.

- 8.28 The GLA viability team have also undertaken an assessment of the scheme viability, They have not disagreed with the values and assessment that GE has made. They have however suggested that a greater amount of affordable housing could be delivered if the scheme were delivered as Build to Rent, or if the market housing was delivered as a residential investment. Whilst officers are minded to agree with the GLA's position, a decision needs to be made on the planning application before the Council, not an alternative proposal. There is no policy requirement for a Build to Rent scheme on the site, and therefore no basis to refuse the application for not providing one.
- 8.29 The s.106 review mechanisms are recommended to capture any changes which improve viability, and secure an uplift in the amount of affordable housing if the viability improves.
- 8.30 For context, the extant planning permission would have provided 41 units of affordable housing in total, 21.6% by habitable room, with a split of 66:34 (by habitable room) in favour of shared ownership). However, that scheme would not deliver an NHS facility or a second staircase, and has not been constructed.

Housing Unit Mix

- 8.31 London Plan (2021) Policy H10 encourages a full range of housing choice and states regard should be had to the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station, or with a higher public transport access and connectivity.
- 8.32 Croydon Local Plan 2018 Policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms, but allows for setting preferred mixes on individual sites via Policy DM1 and Table 4.1. Applying Table 4.1 to this site (urban setting with a PTAL of 4, 5, 6a or 6b) shows a requirement of 10% (in 'New Town' and East Croydon as defined by the Croydon Opportunity Area Planning Framework).
- 8.33 The unit mix of the development (by unit) is produced below for ease of reference:

	1 bedroom	2 bedroom	3 bedroom	Total units
Market Housing	98 (49%)	63 (32%)	18 (9%)	179 (90%)
Shared ownership	17 (8.5%)	2 (1%)	1 (0.5%)	20 (10%)
Total Proposed	115 (57.5%)	65 (33%)	19 (9.5%)	199

Table 1: Unit Mix breakdown

- 8.34 The scheme provides a total of 9.5% 3-bedroom units.
- 8.35 Given the location of the site within the Croydon Opportunity Area, and within 'New Town and East Croydon' character area, the high public transport accessibility and the high-density nature of the proposal, the provision of predominantly one- and two-bedroom units is acceptable in strategic policy terms. The proposal would provide an appropriate mix to meet both London and Croydon Plan policy requirements.

Townscape and visual impact

- 8.36 London Plan Policy D3 requires all developments to make the best use of land by following a design-led approach that optimises site capacity whilst responding to the site's context and capacity for growth. Policy D9 refers to tall buildings and provides criteria for assessing the visual, functional and environmental impacts of such buildings.
- 8.37 The Croydon Local Plan 2018 place-specific Policy DM38, Croydon Opportunity Area, is relevant to this site. The policies seek to enable development opportunities, including public realm improvements, to be undertaken in a cohesive and coordinated manner complemented by masterplans. Policy DM38.3 (central area) allows for tall buildings subject to detailed assessment of building form, treatment, urban design and height along with an assessment of the impact on views, heritage assets, shading and environmental impacts.
- 8.38 The relevant policies, The Croydon Opportunity Area Planning Framework and the adjacent East Croydon Masterplan seek to promote the production of a landmark urban quarter, delivery of a world class railway station, an efficient transport interchange and a well-connected and high-quality public realm. Given the proximity to the stations, nearby towers and the implemented consents there is an expectation for tall buildings to come forward. However, each is judged on its own merits and subject to detailed visual and environmental impact assessment, good design quality and other planning considerations.
- 8.39 There is an extant permission at the site (17/06327/FUL) which has been implemented insofar as the previous building on site has been demolished and groundworks including piling have been undertaken. That permission was for a residential-led mixed use development ranging in height from 9 to 24 storeys. The parameters of this consent have steered the massing and layout of the current scheme. The proposals retain the approved design principles however to overcome fundamental technical and delivery issues this is to be achieved through removal of the basement and the use of a masonry façade design and predominantly brick material palette.

Bulk, Height and Massing

- 8.40 The layout, scale and massing of the proposed development largely aligns with the implemented scheme (17/06327/FUL). As per the extant permission, the shape of the building and its arrangement on site is underwritten by a very strong architectural concept which provides a massing response that is unique to the characteristics of the site. The site, which is rectangular in shape, renders the development somewhat complex when seeking to create acceptable residential floorplate depths, separation distances, the need to maintain privacy and the desire to minimise single aspect north facing units.

- 8.41 The scheme's architectural team have therefore maintained the concept developed by the previous permission that creates two blocks that are different in height but linked by a central podium. The height of this podium has been amended during the course of the application as a result of the provision of the healthcare facility at second floor level. This approach allows for the parking, refuse and cycle storage and other servicing to be accommodated at ground and first floor levels at the centre and rear of the site with the residential units, healthcare provision and amenity space located above.
- 8.42 The heights of the two blocks differ. The rear block at 9 storeys would relate to the adjacent (6-8 storey) Premier Inn building. Given its location and surrounding urban context, this element of the building would be relatively screened and unintrusive within views from the public realm.
- 8.43 The front block would be part 18/part 28 storeys in height and would, in general terms, relate to the heights of the adjacent Carolyn House and to the scale of development at Ruskin Square. The proposed scheme is three storeys higher than the previously consented permission. The applicant has produced a thorough Townscape and Visual Impact Assessment (TVIA) and Vu City modelling to show the impact of this additional height within the surrounding town centre context, from immediate to long-range viewpoints. Whilst higher than the buildings within the immediate context on Dingwall Road (which are up to 22 storeys), the proposed height appears entirely consistent within the wider context of the Croydon Metropolitan Centre.
- 8.44 At street level the building would read as an integral feature which would complement the existing urban grain. The proposal would reflect the existing building line along Dingwall Road. The overall height being immaterial from this perspective. Alongside the Ruskin Square development there would be a greater enclosure to this road, however the setback of the building frontage from the pavement and the additional public realm and tree planting would preserve a comfortable streetscape experience. The proposal would enhance the current appearance of the vacant site and contribute positively to the streetscape along Dingwall Road.

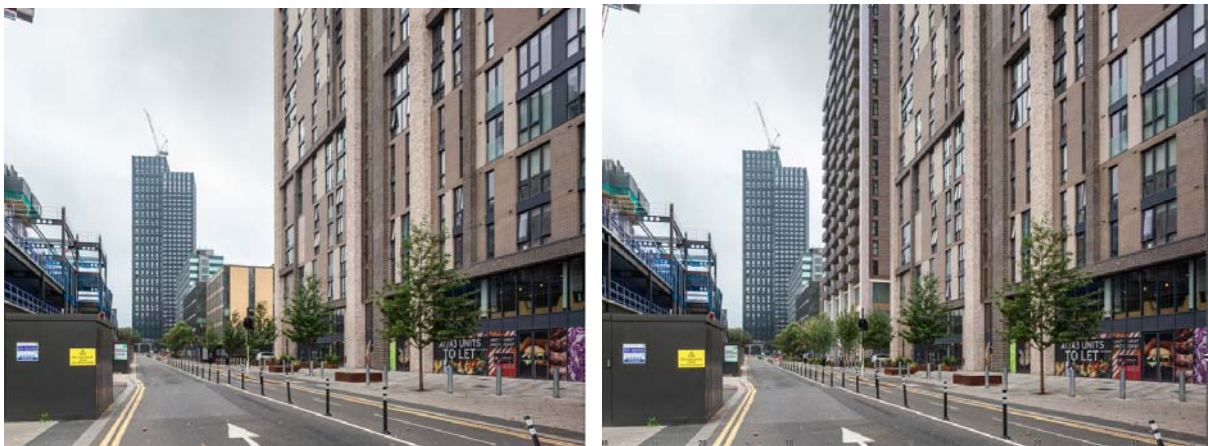


Image 1 - Existing and proposed visualisation at junction of Dingwall Road and Lansdowne Road



Image 2 - Existing and proposed visualisation at junction of Dingwall Road and George Street

8.45 When viewed from a range of wider perspectives, including Croydon Panoramas as identified in the Local Plan, it is clear that the proposed building sits comfortably and entirely appropriately within the wider townscape.



Image 3 - Proposed visualisation from Addington Hills (with red being the consented scheme overlaid)



Image 4 - Proposed visualisation from Wandle Park (with red being the consented scheme overlaid)

8.46 The front block would be stepped inward (between Floors 17 and 28) which successfully reduces the massing of the upper element of the block, creating a

slenderer profile within the wider skyline. The break in mass creates an amenity area at Floor 17 for future residents.



Image 5 – Proposed Dingwall Road Street elevation

8.47 The approach taken is considered to be successful and would result in a development that reflects the existing and emerging medium to tall developments in this central site adjacent to East Croydon Station.

Appearance

8.48 The overall façade design creates a distinctive, high-quality development. Given the prominent location of the site and the proposed tall building, it is essential that excellent design quality is delivered. The principle of the architectural expression has been formulated following a thorough character analysis of the local context which is supported.

8.49 The scheme's architectural team have followed a concept for the front block that uses a frame to express the verticality of the building in five equal fin columns capped at the top of the building or, in the case of the first fin column, a cut at Floor 18, which allows for an amenity terrace to be provided and helps to reduce the massing of the frontage building.

8.50 On the Dingwall Road frontage, the base of the building comprises three storeys which accommodate entrance, access and circulation space, communal space (residents gym at first floor) and health centre at second floor. There is a visual break between these uses and the residential elements above, whereby these frontages span glazing across the entire façade between brick piers. There is also a double height undercroft to the southern end of this frontage that leads to the entrance to the rear block and associated parking and servicing areas for the development. The height of this base element is entirely consistent with neighbouring visual cues along Dingwall Road, denoting a clear public entity which would be most noticeable within the street scape.



Image 6 – Visual of proposed street frontage



Image 7 – Visual of entrance and lower levels

8.51 Public art façade panels are coordinated across the frontage with a larger two storey panel giving prominence to the residential entrance. Access to the undercroft is gated, the design of these gates to reflect the public art strategy with perforations to maintain a visual link to the rear block entrance. These panels also wrap round the base of the side and rear elevations of the building to create a unified artistic design that links the front and rear blocks. This will create a distinctive and creative focal point to the building. The procurement of an artist will be via competition with an emphasis to invite artists with a local community connection and that the design will bear reference to

Croydon's historical and cultural identity. Officers will work closely with the applicant and design officers to ensure a quality finish is secured.

- 8.52 The external material proposed is largely brick. This includes strong brick pier detailing, protruding brick courses with discrete panel joining between colour tones. These details and the articulation of the facades break down the massing of the new built form. The use of the brick reflects an evolving locally distinctive pattern of 'new London vernacular' that is seen in other recent development surrounding East Croydon Station, including the Vita building, Carolyn House and the Morello development at Cherry Orchard Road.
- 8.53 The fenestration openings on the front façade sit within the brick fins/columns and are largely screened behind balcony structures. Balcony balustrades are proposed to be black metal railings. The railings are proposed to be angled to enable greater levels of privacy to mitigate the need for future residents to install makeshift screening.
- 8.54 The side elevations of the frontage block will also have a notable visual presence in the wider area, particularly in the southern side elevation which will be readily visible in views along Dingwall Road from George Street. The windows have a strong vertical emphasis with projecting brick panel detailing between and around them to further emphasis the verticality. The outside edges of the windows/brick panelling have a deep reveal of 225mm. These features combined create a strong visual presence and quality of finish.



Image 8 – Detailing of side elevation

- 8.55 The crown supports are proposed to read as a lightweight feature, set back from the outside face of the frame to sit integral with proposed glass screens that shield the upper storey amenity area.
- 8.56 The composition of the elevations and their materiality play an essential role in breaking up the massing and providing relief, design interest and contributing positively towards local character. The detailing (including window reveal depths, balcony details, glazing, public realm materials) and high-quality finish of materials would be secured by condition.

8.57 The applicant has provided a series of images that demonstrate the proposed development in the local context. The images provide reassurance that the proposed approach to materiality responds to the local context; in particular, neighbouring developments whilst maintaining the sense of distinctiveness essential for this important site in close proximity to East Croydon Station.

Public realm

8.58 The public realm design focusses around the frontage of the application site and provides an area of soft and hard landscaping whilst accommodating the four-metre safeguarding zone along Dingwall Road that is required for the potential future expansion of the tram network (which is to be secured by a s.106 obligation). The hard landscaping is drawn from a simple palette of robust materials which relate to the materiality of the existing Dingwall Road public realm. Soft landscaping at the frontage comprises 4 trees with landscaped beds beneath to continue the avenue tree planting along this side of Dingwall Road.

8.59 In addition to the public realm at the frontage of the development, it is proposed that the development includes a future route for general public use through the application site from Dingwall Road to Southern House at the rear. This route is provided along a denoted pedestrian access through the site. This route will be secured via a Section 106 agreement but its future utility is very much dependent upon a future redevelopment of Southern House or agreement with neighbouring land-owners. Whilst the entrance is proposed to be gated for security reasons, were the route through to be realised in the future, the s106 can be appropriately worded to ensure the gate remains open at certain times of the day to allow the public access through.

Heritage impacts

8.60 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Regarding Conservation Areas (section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance.

8.61 The NPPF (2021) places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets and affords great weight to the asset's conservation. At paragraph 199 it states that:

“great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm”

8.62 Any harm to a designated heritage asset, including from development within its setting requires “clear and convincing justification”, with less than substantial harm weighed against the public benefits delivered by the proposed development.

8.63 Local Plan Policy DM18 permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets. Further to this London Plan Policy HC1 states that developments should conserve historic significance by being sympathetic of the assets' significance and setting. Policy HC3 protects strategic and local views. This

policy goes on to state that new development can make a positive contribution to the views, and this should be encouraged.

- 8.64 The site itself is not situated within a conservation area nor contains any historic features. The closest Conservation Area is Central Croydon which covers the western part of George Street and North End. The conservation area sits to the west side of Wellesley Road, the closest part approximately 150m (at the crow flies) from the development site. The closest statutorily listed buildings are Electric House on Wellesley Road (150m away) (Grade II listed), the Grade I listed Alms Houses on the corner of North End and George Street, approximately 335m away and Grade I listed Parish Church of St Michael and All Angels on Poplar Walk (approximately 400m away). There are several locally listed buildings with the vicinity of the site, including Corinthian House on the corner of Dingwall Road and Lansdowne Road (approximately 100m from site), East Croydon train station (approximately 170m from site), No.1 Croydon (approximately 280m from site) and a number of other buildings on George Street (71 to 79 on the northern side of George Street, Norfolk House which wraps round the corner of George Street and Wellesley Road) as well as with the Central Croydon Conservation Area. Locally Listed Historic Parks and Gardens include Queens Gardens (440m to the southwest of the site) and Park Hill Park (approximately 490m to the southeast).
- 8.65 Extensive modelling and visualisations have been undertaken from numerous viewpoints which is sufficient to understand the likely impact on the setting of local heritage assets. These visualisations demonstrate that the proposal would have no harmful impact on the setting of these heritage assets against the backdrop of existing and consented developments within the Croydon Metropolitan Centre.
- 8.66 Several views from important locations within heritage assets were scoped out as it was demonstrated that there would be no view of the proposed building from these sensitive locations or that view would be screened. These views include – North End/George Street adjacent to Alms Houses; Local Designated View from George Street of No.1 Croydon and view along George Street; view from Electric House; view from eastern edge of Queens Gardens.

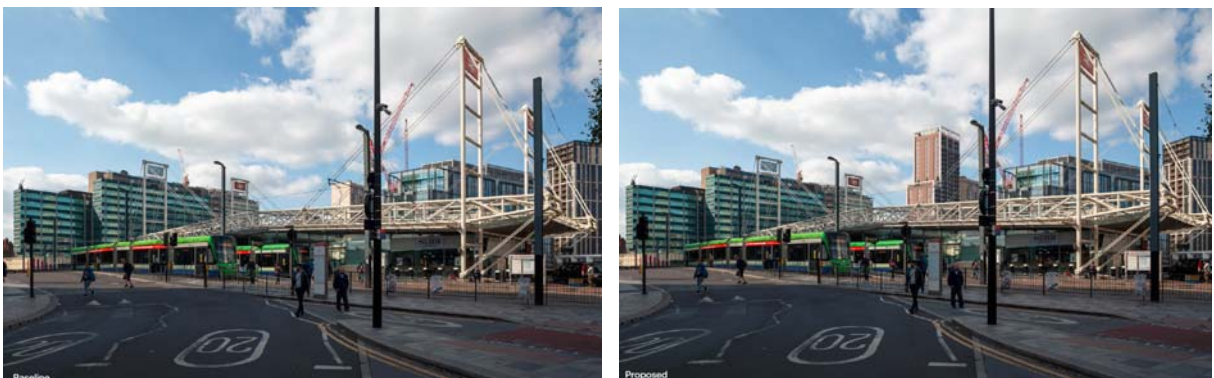


Image 9 - Existing and proposed visualisation from front of East Croydon Station

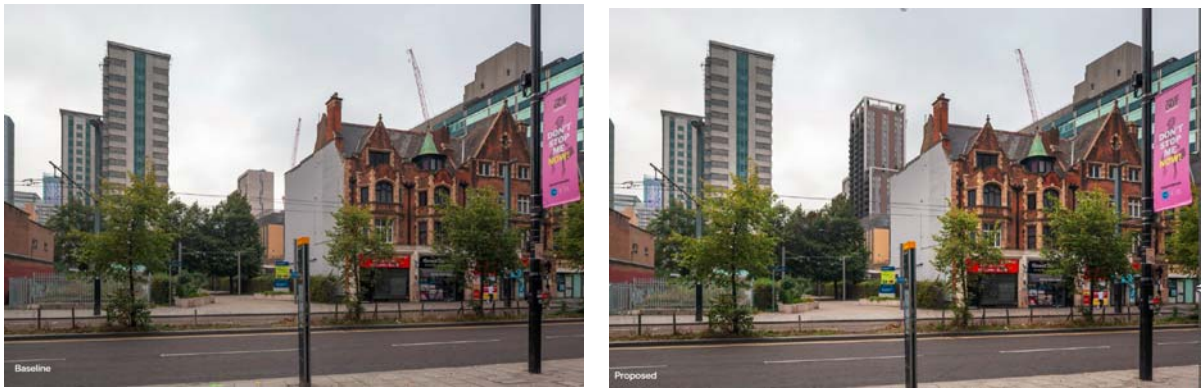


Image 10 - Existing and proposed visualisation from southern pavement of George Street, at Collage Square facing north

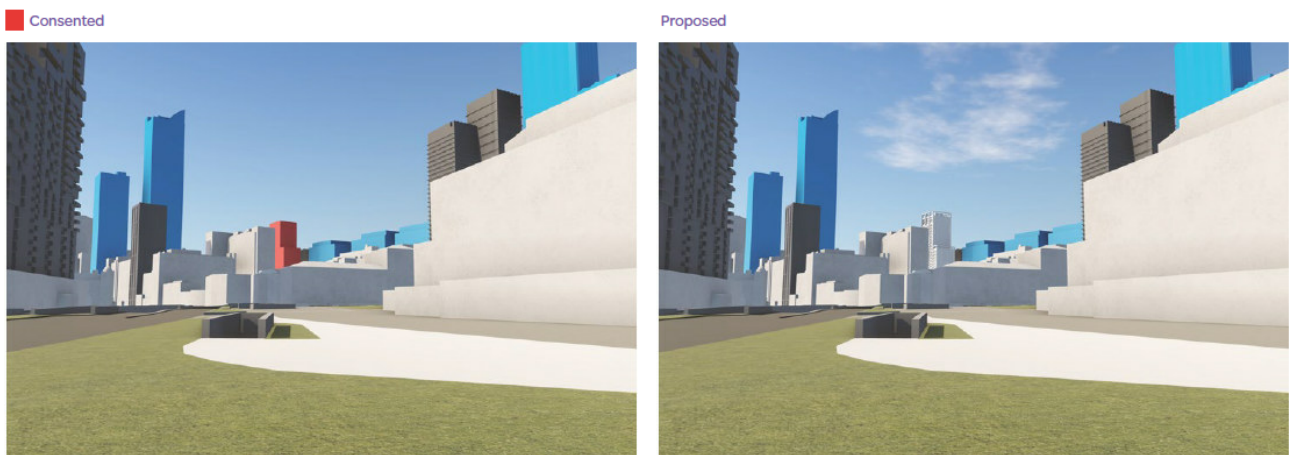


Image 11 – Consented and proposed representative view from junction of A232 Croydon Flyout with Park Lane (adjacent to the eastern side of Queens Gardens)



Image 12 – Consented and proposed representative view from Park Hill Park

8.67 It is concluded that there would be no harm on the significance of the nearby heritage assets and Conservation Area. Notwithstanding, were members to come to a different view, as per paragraph 202 of the NPPF (2021), where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposed building. For the avoidance of doubt, the proposed scheme does offer several public benefits, redevelopment of an underutilised site, 199 residential units, provision of a much-needed healthcare facility in Croydon centre, creation of jobs, improvements to the public realm and an improved active frontage.

Overall

- 8.68 It is considered that the massing and appearance of the proposal is appropriate and with the imposition of suitably worded and detailed conditions, will contribute positively to the existing and emerging townscape of the Croydon Metropolitan Centre.

Quality of healthcare accommodation

- 8.69 The scheme provided a new healthcare facility within the centre of Croydon which the NHS has confirmed is required to meet current local need. This is a strong benefit of the amended scheme. The applicant has worked with the NHS to form the floor plan to fit the operational and flexible needs of the NHS as far as can be ascertained at this stage, without knowing the exact use or end-user. The quantum of floor space (1,026sqm total) accords with NHS requirements.
- 8.70 The accommodation comprises the healthcare facility at second floor level with an entrance lobby fronting Dingwall Road. The provision is accessed via 2 x lifts and a stair core dedicated to the healthcare facility's use. The facility has a second emergency stair core and lift further back within the site, as well as a separated refuse and cycle store at ground floor level. An ambulance bay is proposed within the site. Transport impacts are discussed further below.
- 8.71 The internal layout and fit out of the healthcare facility will be developed in collaboration between the developer and NHS, and in consultation with the MET police to ensure adequate security standards are achieved. The details will be secured by condition. The fit out will be funded by the developer and will be secured within the legal agreement.

Quality of residential accommodation

Residential space standards

- 8.72 London Plan Policy D6 states that housing developments should be of a high quality and provide adequately sized rooms with comfortable and functional layouts. It sets out minimum Gross Internal Area (GIA) standards for new residential developments, that accord with National Described Space Standards (NDSS) (2015). London Plan Policy D6 and Policy DM10.4 of the Local Plan require provision of high-quality private amenity space at a minimum of 5sqm per 1-2 person unit and an extra 1sqm per extra occupant thereafter, with a minimum depth and width of 1.5m. Aligning with the above-mentioned policies, the London Housing SPG (2016) and London Plan Guidance (LPG) Housing Design Standards (June 2023) outline a number of required standards to ensure quality accommodation.
- 8.73 A full schedule of accommodation has been provided by the applicant and can be found at Appendix 2. Within the proposed development, all of the proposed units would meet the London Plan and NDSS requirements in terms of overall size, bedroom size and storage space. The number of dwellings accessed from a single core does not exceed eight; all units would achieve a minimum 2.5 metre floor to ceiling height (as required by Policy D6, and the living room sizes would generally align with or exceed the standards (overall sizes, and width) in the Housing Design Standards LPG.

Aspect, Ventilation and Overheating

- 8.74 The Housing Design Standards LPG says that new homes should be dual aspect unless exceptional circumstances make this impractical or undesirable. Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces, should not face north and must provide adequate daylight and privacy.
- 8.75 London Plan Policy D6 says single aspect dwellings should only be provided where it is considered a more appropriate design solution to meet the requirements of London Plan Policy D3 (optimising site capacity through the design-led approach) and that it can be demonstrated that it will have adequate passive ventilation, daylight and privacy. The policy requires development to provide sufficient daylight and sunlight that is appropriate for its context.
- 8.76 All of the proposed two- and three-bedroom units would be dual aspect, located on the corner of the buildings and taking opportunities for cross ventilation where possible. 65 units (33%) are single aspect, these all comprise one bedroom and all of these units face either east or west. There are no single aspect north facing units, meaning all homes would have access to direct sunlight; and smaller windows are proposed on the south (east) elevation to minimise overheating. Many of the windows will be located below balconies which will provide natural shading.
- 8.77 London Plan Policy SI 4 (Managing heat risk) says that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. Major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems.
- 8.78 An Overheating Assessment has been provided. The assessment demonstrates that the proposed development passes the overheating assessment for a moderately warm summer however struggles to meet the requirements during periods of higher intensity (i.e. high temperatures during evening/night-time hours).
- 8.79 The building will have a reinforced concrete frame which provides a significant amount of thermal mass, which provides a dampening effect, allowing the development to buffer itself from extremely high temperature outside. Because of the thermal mass, the building does not cool down instantly on a warm summer evening, however lowering the thermal mass is not recommended as it helps to buffer against extreme temperatures during the day. The development will also have highly insulated external walls which minimise any heat gain through conduction.
- 8.80 There are no south facing single aspect units. Where possible living areas are located on corners to allow for cross ventilation which allows occupants to use natural ventilation more effectively to control their indoor temperature. Mechanical ventilation is also proposed. Overhanging balconies will create some external shading and solar control glazing is proposed. Efficient LED lighting is required as part of the Energy Strategy which minimises internal heat generation. No mechanical cooling systems are deemed necessary for the residential element of the scheme. It is considered that all possible measures have been taken to reduce internal overheating as far as practicable.
- 8.81 Assessment of overheating within the non-residential spaces is not feasible at this point as such assessment requires understanding of internal gains from proposed us

of these spaces and detailed design of ventilation equipment. However, these spaces will follow to cooling hierarchy as outlined in London Plan Policy SI 4 in order to minimise overheating and cooling demand. Highly efficient LED lighting and solar control glazing will be specified, and mechanical ventilation will be used.

8.82 As a result, the homes are considered to be appropriately designed in accordance with the relevant standards.

Accessibility

8.83 London Plan Policy D7 states that new development must ensure that 10% of new dwellings within a scheme (which are created via works to which Part M volume 1 of the Building Regulations applies) must meet Building Regulation requirement M4 (3) 'wheelchair user dwellings'. All other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Policy SP2.8 of the CLP (2018) states that the Council would ensure that new homes in Croydon meet the needs of residents over a lifetime.

8.84 20 of the units (10% of the total) would be accessible or capable of easy adaptation for wheelchair users (M4(3) compliant). The remaining 90% (179 dwellings) would be M4(2) compliant. Three lifts are proposed in the front block and two in the rear.

Entrance and approach

8.85 To accord with the Housing Design Standards, the communal entrance lobbies should be visible and clearly identifiable from the public realm. The residential accommodation in the front block has direct access from the front of the building and the frontage has been designed with a two storey public art feature that denotes this entrance arrival. Within the building there would be a large lobby area and a concierge desk.



Image 13 - Visualisation of Dingwall Road frontage and access to front block

8.86 Given the tight constraints of the site, entrance to the rear block is set back within the site, accessed via a footpath situated under the undercroft and through the parking area. A denoted pedestrian walkway is proposed and the entrance is visible in views from the front of the site. The two-storey public art feature is followed through to this

rear entrance to demark this space. Gates are proposed to be installed within the undercroft which will ensure that the servicing area and rear access for residents is secure. This layout was approved within the previous permission and officers have worked with the applicant during the current submission to enhance this space as far as possible. On balance, the access layout is considered acceptable.



Figure 3 – proposed ground floor layout plan



Image 14 - Drawing showing pedestrian access to rear block

Privacy

8.87 Standard 28 of the Housing SPG states that habitable rooms should be provided with an adequate level of privacy in relation to neighbouring properties, the street and other public spaces. 18-21m is indicated as a suitable minimum distance between facing

habitable rooms, although the standard notes that “*adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density*”.

- 8.88 The lower 6 storeys of residential accommodation in the front block and upper 6 storeys in the rear block face onto each other and are separated by a distance of 16.5 metres (15m to back edge of balcony). This relationship is between new-to-new accommodation (i.e. no existing occupiers). The units in the front block have their balconies facing westwards into to the site. The rear block has been designed to limit any overlooking issues as far as possible. Main affected windows serve bedrooms, which are less likely to be utilised during the daytime and the windows that serve main living areas are secondary with main openings having a side facing outlook. As such, it is considered that mutual overlooking between residential units within the site would be at acceptable levels.
- 8.89 Above the level of the rear block, the residential units in the front block facing westwards have unrestricted obtrusions above the rear block into the rest of the development site.
- 8.90 Some third-floor residential windows and one amenity area face directly onto the podium level communal amenity space. Where this has been unavoidable, landscape buffers have been provided to ensure the privacy of occupiers as far as possible. Main effected windows serve bedrooms, which are less likely to be utilised during the daytime and the windows that serve main living areas are secondary with main openings having a side facing outlook.
- 8.91 In terms of privacy from adjacent sites, it is noted that the majority of adjacent premises are commercial in use and therefore mainly likely to be occupied during the daytime.
- 8.92 Southern House to the rear/east is located 20m from its rear boundary and therefore there would not be any harmful privacy issues. If this site were to come forward for redevelopment in the future, consideration would need to be given to the position of the windows in the rear most elevation of the proposed development.
- 8.93 Renaissance House to the south comprises 5 storeys of office use. The majority of residential use in the proposed scheme starts at third storey level. Habitable room windows are proposed in the side elevation facing Renaissance House however the majority are secondary to the main living space, and it is recognised that bedrooms will be less used during the daytime (when Renaissance House is occupied).
- 8.94 The Home Office building directly on the opposite side of Dingwall Road is approximately 19m away from the front face of the proposed balconies. Given this gap, there would not be any harmful privacy issues. Again it is noted that this building will be mostly occupied during the daytime.
- 8.95 Carolyn House to the north is in residential use. The windows in the side elevation serve a communal stairwell which poses no concerns in terms of loss of privacy of the proposed new units. Habitable room windows are proposed in the side elevation facing Carolyn House however the majority are secondary to the main living space, and it is recognised that bedrooms will be less used during the daytime. The proposed rear block is approximately 23m away from Carolyn House and given this separation distance there would not be any harmful privacy issues.

8.96 The Premier Inn hotel also to the north has no main windows in the side elevation facing the application site and therefore there will be no loss of privacy to future occupiers from this building.

Communal Amenity Space and Child Play Space Provision

8.97 Local Plan Policy DM10.5 requires provision of high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.

8.98 A range of communal residential amenity areas are provided throughout the scheme in the form of roof terrace areas. The third-floor podium provides approximately 275sqm of usable space (after defensible space around residential windows is removed) and will comprise soft and hard landscaping and incorporate playspace into the landscape. There are further amenity areas at Level 17 of the front block (115sqm), and rooftop communal amenity areas at the top of each block (205sqm on rear block and 151sqm on front block). In total, approximately 746sqm of usable external amenity space is provided across the development which is considered a significant amount for a high density, urban development in a town centre location.

8.99 The results of the overshadowing assessment show that, as a whole, 88% of the proposed amenity spaces experience at least 2 hours of sun on the 21st of March. This is well in excess of the BRE target of 50%. The roof top terraces will be very well sunlit with each enjoying more than 2 hours of sunlight to 88-100% of the space. The podium space at third floor level is marginally more constrained by the presence of the existing and proposed adjacent structures but will still achieve very good levels of direct sunlight throughout the year with 85% of its area receiving more than 2 hours. Notably, raising the podium within the amended scheme from second to third storey has been a significant positive design change. In the consented scheme the podium only received 2 hours of sunlight to 25% of the space.

8.100 Internal communal amenity spaces are also provided, including a resident's gym at first floor (110.9sqm), residents flexible lounge at third floor level (70sqm) which opens out onto the third-floor podium space which will act as an extension to this area. This communal provision is for residents of both blocks.

8.101 Play space – London Plan Policy S4 requires residential developments to incorporate good quality, accessible play provision for all ages. At least 10sqm of play space should be provided per child that a) provides a stimulating environment b) can be accessed safely from the street by children and young people independently c) forms an integral part of the surrounding neighbourhood d) incorporates trees and/or other forms of greenery e) is overlooked to enable passive surveillance f) is not segregated by tenure. Local Plan Policy DM10.4 (d) requires all flatted development to provide a minimum of 10m² per child of new play space, calculated using the Mayor of London's population yield calculator.

8.102 Based on the GLA play space and population calculator, the proposed development generates a child yield of 31.6. Based on the GLA children's play space requirement calculator this leads to a total play space requirement, for all age groups, of 315sqm.

Age	Play Space Requirement	Proposed Play Space Provision
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Under 5 Years	170sqm	221sqm
5 to 11 years	110sqm	183.7sqm
12+ years	35sqm	47.7sqm
Total	315sqm	451.9sqm

Table 2 – Play Space required and proposed

8.103 The proposed play space is split between the podium and roof top communal gardens. All of the under 5's play space is located at podium level and is proposed to consist of a variety of landscape features, games, sensory play, grass mounded wave structures, play panels and growing beds. The older years provision will be set across the communal levels. The 5-11 years play space will incorporate sculptural play equipment to focus on providing active and sensory play suitable for the location. The 12+ play space will include areas for informal social recreation and includes features such as a table tennis tables and areas to socialise and interact with peers. The amount of proposed play space exceeds the policy requirement and full details will be secured within the landscape design condition.

8.104 Private Outdoor Amenity Space

8.105 All of the units would also meet the requirements outlined Local Plan Policy DM10.4 and the Housing SPG in relation to amenity space quantum and minimum dimensions. Within the front block, the amenity space is a uniform size sitting between the brick piers across the front and rear facades. The amenity space in this block exceeds the minimum standards for all units. At the rear block, the balconies would be located on the rear elevation, and inset within the flank elevations; again all achieving at least the minimum space standard for each home.

8.106 The submitted wind study also indicates that all of the balconies would achieve wind conditions that are suitable for their intended external amenity use.

Daylight and sunlight conditions for future residents

8.107 The Building Research Establishment (BRE) Report 209, '*Site layout planning for daylight and sunlight: A guide to good practice*', is the reference document used by most local authorities for assessing daylight and sunlight in relation to new developments. Commonly referred to as 'the BRE guidelines', it provides various testing methodologies to calculate the potential light levels received by neighbours of a development site and provided within a proposed new development. The 2022 update to the BRE guidance was published on 9th June 2022. The assessment methodologies and target metrics in respect of the impacts to neighbouring properties remain broadly unchanged from the earlier (2011) guidance save for some areas of clarification. The primary change relates to the assessment of internal daylight and sunlight amenity within the proposed habitable accommodation. It is important to note that the standards set out in 2022 guidance are generally harder to achieve than the previous Average Daylight Factor (ADF) assessments adopted under the 2011 version of the guidance. A lower compliance rate with the new targets is not indicative of a less acceptable scheme as the difference in the assessment metrics should be noted. This is particularly so in respect of urban development where a number of important design factors such as the provision of balcony private amenity space and limiting solar gain / overheating may lead to a trade-off against achieving higher internal amenity levels.

8.108 The daylight and sunlight amenity provided within the proposed residential accommodation has been assessed using both the Daylight Illuminance and Sunlight

Exposure assessments set out within the 2022 BRE guidance and the ADF and APSH tests from the 2011 BRE guidance which were utilised when determining the earlier consent for the site.

Daylight

- 8.109 2022 BRE Assessment for daylight - The Daylight Illuminance method utilises climactic data for the location of the site, based on a weather file for a typical or average year, to calculate the illuminance at points within a room on at least hourly intervals across a year. The guidance provides target illuminance levels that should be achieved across at least half of the reference plane for half of the daylight hours within a year. Bedrooms are expected to achieve illuminance levels of 100 Lux and shared Living/Kitchen/Dining Rooms 150 Lux.
- 8.110 The results of the Daylight Illuminance assessment indicate that 398 (79%) of the 502 habitable rooms meet or exceed the BRE target. Of the 30 LKDs that fall below the targets, 15 of these will achieve a median Lux of between 75 and 113 which is a less significant deviation from the 150 target. All of the LKDs that fall below the target are positioned beneath balconies which act as an obstruction and can limit the amount of light available from the sky to the windows but provide well-lit external amenity space for the occupiers. A number of the bedrooms that fall below the target are also overhung by balconies.
- 8.111 The BRE guidelines note the effect of balcony provision in potentially restricting internal amenity however this is a common trade-off in a modern flatted scheme and also carries shading benefits, to minimise overheating within the changing climate. In view of the obstructions that these balconies present, the assessment has considered the daylight illuminance assessment to the rooms without the obstructions in order to illustrate what role these play in potentially limiting internal daylight to both the living spaces and bedrooms. When the impact of the balconies is taken into account the number of rooms which meet the target increases from 398 to 415 (83%).
- 8.112 The results of the daylight illuminance assessment are consistent with daylight levels that are considered typical for urban development. Whilst there are deviations to the lower floors and areas beneath balconies, the vast majority of the rooms will be well lit.
- 8.113 2011 BRE Assessment for daylight - The previous 2011 edition of the BRE 209 document utilised the Average Daylight Factor (ADF) method for calculating internal amenity. The ADF method calculates the average illuminance within a room as a proportion of the illuminance available to an unobstructed point indoors under a sky of known luminance and luminance distribution. This calculation considers the physical nature of the room behind the window, including window transmittance and surface reflectivity.
- 8.114 The results of the ADF assessment have shown that 451 (90%) of the 502 habitable rooms meet the BRE and British Standard guidance criteria. The previously consented scheme attained an overall compliance rate of 67%.

Sunlight

- 8.115 In respect to direct sunlight, the 2022 BRE guidance recommends that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1 February and 21 March with cloudless conditions. This can be applied to all rooms, but

it is preferable for the target to be achieved within a main living room. Rooms in all orientations may be assessed and the sunlight received by different windows may be added together provided there is no double-counting. The site layout and design should maximise the number of dwellings within main living rooms meeting these targets. It is also advised that a dwelling has at least one window wall facing within 90 degrees of due south.

- 8.116 Overall, 111 (56%) of the 199 proposed units would meet or exceed the BRE target, with the majority of these units achieving the figure within the main living space (103 units). Furthermore, the urban nature of the site and context of Croydon means that there are a number of neighbours in close proximity to the south and west which somewhat obstruct the amount of sunlight that can reach the units within the proposed scheme. Therefore, the more limited levels of sunlight can be considered typical of the urban context. Overall, the height of the proposed scheme is commensurate with the development context and the sunlight compliance is considered to be in line with the BRE guidance.
- 8.117 2011 BRE Assessment for sunlight - The Annual Probable Sunlight Hours (APSH) test calculates the percentage of probable hours of sunlight received by a window or room over the course of a year. The guidelines suggest that the main living rooms within new buildings should achieve at least 25% of annual sunlight hours, with 5% during the winter period. For neighbouring buildings, the guide suggests that occupiers will notice the loss of sunlight if the APSH to main living rooms is both less than 25% annually (with 5% during winter) and that the amount of sunlight, following the proposed development, is reduced by more than 4%, to less than 0.8 times its former value.
- 8.118 In terms of sunlight under the 2011 test, the assessment shows that of the 132 living spaces where the main windows are oriented within 90 degrees of due south, 85 (62%) achieve the recommended levels of 25% APSH and 5% APSH. This is 43% of all of the units in total.
- 8.119 It is noted that the consented scheme provided only 39 BRE compliant L/K/Ds compared with the amended proposals which provide 85 units which achieve the 2011 BRE target for annual sunlight. 111 units meet the 2022 BRE target, 103 units achieving the target in the main living space (52% of units).
- 8.120 The scheme has a similar internal arrangement to the consented scheme in terms of the orientation and layout of the residential units but provides a notable uplift in the number of units that have daylight/sunlight levels that meet the BRE and British Standards. On this tightly constrained site, the living room, kitchen and dining room of each flat have been designed to maximise the amount of light into the living area and each unit has access to a private balcony that meets or exceeds policy requirements. There are several tests set out in the BRE guidance relating to sunlight and daylight, and most of homes will comply with at least one of those tests in at least one habitable room; resulting in relatively good access to sunlight and daylight within a built-up urban setting. Overall, it is considered that the levels of daylight and sunlight are satisfactory.

Overall quality of amenity

- 8.121 Given the tight constraints of this site and its location within the Metropolitan Centre of Croydon, the proposed development creates a good quality residential development that provides amenity of future occupiers that accords with all policy requirements.

Impact on neighbouring residential amenity

8.122 Croydon Local Plan (2018) Policies SP4.1 and SP4.2 seek to respect and enhance character to create sustainable communities and enhance social cohesion and well-being. Policy DM10.6 states that the Council will support proposals for development that ensure that; protect neighbouring amenity; do not result in direct overlooking at close range or habitable rooms in main rear or private elevations; do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling; provide adequate sunlight and daylight to potential future occupants and do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers. London Plan Policy D3 requires development to deliver appropriate outlook, privacy and amenity.

Sunlight and daylight

8.123 The application is accompanied by a Daylight and Sunlight Assessment which provides an assessment of the potential impact of the development on daylight and sunlight to neighbouring residential properties.

8.124 Daylight impacts on the relevant neighbouring buildings have been assessed with tests for Vertical Sky Component (VSC) and No Sky Line (NSL). Sunlight has been assessed against the Annual Probable Sun Hours (APSH). See Appendix 3 for terms, in relation to the 2011 BRE 'Site Layout Planning for Daylight and Sunlight'

8.125 Guidance suggests that if the VSC percentage difference is less than 27% and less than 0.8 times its former value then there would be an adverse effect. However, the BRE guidance allows alternative target values and an appropriate degree of flexibility particularly to higher density development, in opportunity areas, town centres, large sites, accessible locations and allocated sites. It is considered this is the case here and that the BRE standards should be applied flexibly, endorsed by the London Housing SPG (2016).

8.126 The OAPF (paragraphs 6.21-6.25) states that it is important to ensure that any adverse effects from loss of sunlight and daylight to residential occupiers is minimised. The document goes on to state that: "*It is recognised that in heavily built-up areas such as the Croydon Opportunity Area, new development will inevitably result in some level of overshadowing and overlooking of neighbouring properties and amenity spaces. It should be noted that the existing pattern of development in the central part of the COA is not conducive to the application of normal planning guidelines for sunlight and daylight. As such, as part of new development proposals, there will need to be a flexible approach to the protection of natural light for existing properties*".



Image 15 – Adjacent residential buildings

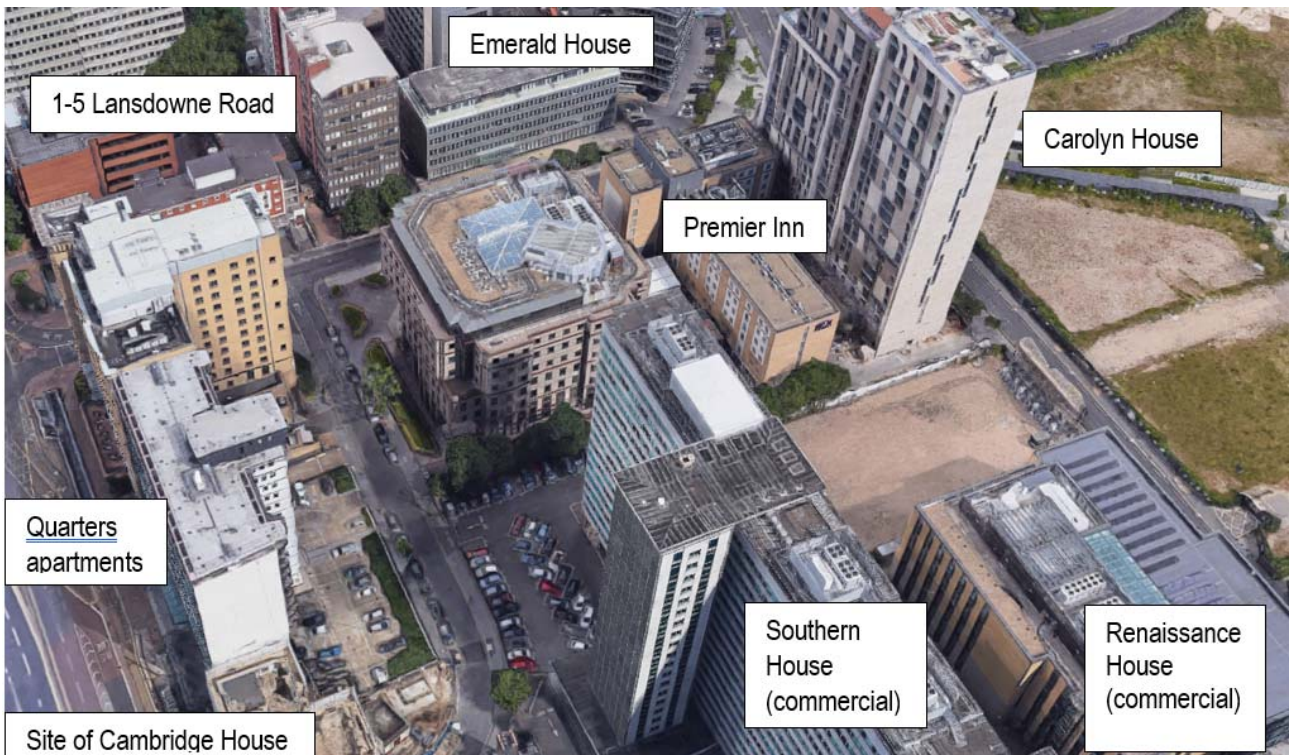


Image 16 – Aerial view of adjacent buildings

Quarters Apartments - 20 Wellesley Road

8.127 Quarters Apartments is a 13-storey building located to the west of the site on Wellesley Road and is made up of studio apartments. The windows to the rear of the building are partially obstructed from the development site by Southern House.

8.128 Within the previous consented scheme, the Daylight test results showed that all but two of the assessed rooms would continue to achieve levels of internal daylight in excess of the recommended BRE Report guidelines and that those two rooms fall marginally below the guidelines and retain 0.75 and 0.79 of the value in the existing conditions (former value). As such it was considered that the occupants would not be adversely affected by these changes. The VSC test showed that all but 5 of the 130 assessed windows would exceed the recommended guidelines. Of the windows that transgress, 3 retain in excess of 0.70 the former value while the other two retain 0.60 and 0.38. The transgressions occur to windows positioned beneath balconies and achieve low daylight levels in the existing conditions. The BRE Report makes reference to testing without balconies and the appended results show that all the windows would pass the guidelines if the balconies were not present. Therefore, the rooms as a whole will continue to meet the BRE guidelines.

8.129 Compared to the previously consented scheme, the assessment shows that there will be no further noticeable impacts to this property. All of the rooms analysed all will retain absolute VSC values within 0.3% of the consented scenario and any changes will therefore be unnoticeable. Very minor shifts in the more detailed "No Skyline Contour" (NSC) test are noted to a small number of apartments at the very lowest floors. However, the most significant shift is just 4.4%, with the proportional retention values for all rooms remaining virtually unchanged.

8.130 For sunlight, in accordance with BRE recommendations, it has not been necessary to test this property because the windows facing the site are not within 90° of due south.

Carolyn House, 26 Dingwall Road

8.131 Since the previous permission was granted, works to Carolyn House have been completed. The property has been converted from office into residential use and has benefitted from a four to six storey rooftop extension. The windows in the site elevation facing the application site serve a communal stairwell.

8.132 Within the previous scheme it was assessed that all of the rooms would continue to retain daylight amenity in line with the BRE Report guidelines by achieving at least 0.8 times the former value. The ADF test results showed that all of the assessed rooms would continue to achieve either very similar levels or would remain in excess of the recommended BRE Report guidelines.

8.133 The current submission shows that this property will not be any more harmfully affected than the previously consented scheme. The results of the assessments confirm additional reductions to a small number of habitable rooms of 0.5% VSC or less which would be an unnoticeable shift.

8.134 In respect of direct sunlight there are no main living areas facing the proposals which have windows with 90 degrees of due south, and are therefore not relevant for the APSH sunlight assessment under the BRE guide. Notwithstanding, the scheme is to the south and therefore the assessment has been undertaken. The findings confirm that the majority of windows experience no change in APSH levels and those that do experience unnoticeable shifts of only 1-2%.

One Lansdowne (1-5 Lansdowne Road)

8.135 The land at this address currently contains a four-storey hotel (The Lansdowne Hotel) on the corner of Lansdowne Road and Wellesley Road and a ten-storey office building (Marco Polo House, 3-5 Lansdowne Road). If only considering the existing uses on site, a Daylight and Sunlight assessment would not be required in respect of these adjacent uses.

8.136 Permission was granted in 2017 for the demolition of the existing buildings and the erection of a part 11, part 41 and part 68 storey development comprising 794 residential units. This permission is extant although works have not commenced on site. When considering this extant permission, the Daylight and Sunlight Assessment uses the 25-degree line test as recommended in BRE guidance. The test was taken from the 12th floor of the Lansdowne Road development as the floors below were proposed to be used as offices. The assessment shows that almost the entirety of the proposed scheme falls below the 25-degree test with only the parapet (top 5m of the front tower) breaching the line. Given the distance between and offset from this proposed development, it is accepted that with regard to the extant scheme, no additional detailed analysis is required.

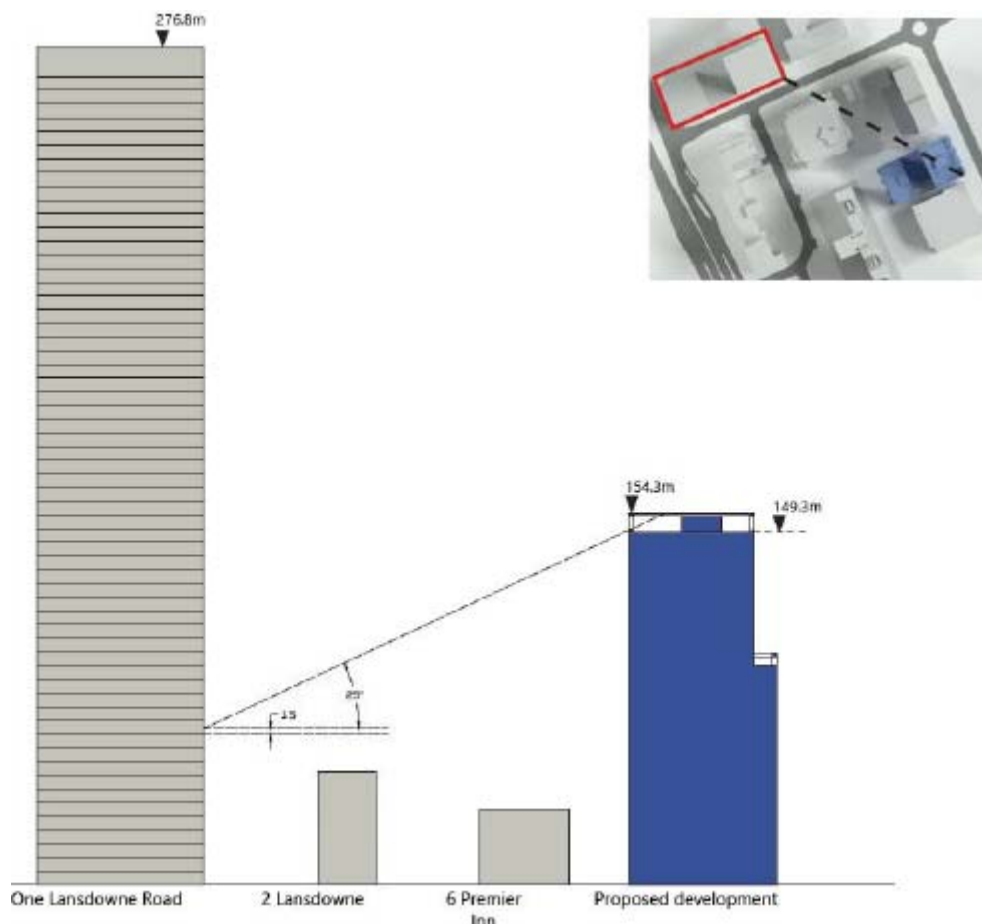


Image 17 – Impact on development on 1-5 Lansdowne Road

8.137 In July 2023 a further planning application was submitted at this site (ref 23/02689/FUL) for a mixed-use office and residential development comprising two towers, one a maximum height of 4 storeys and the other 35 storeys. Residential use extends down to the lower floors. The application is yet to be determined.

8.138 The closest proposed building at the One Lansdowne site is over approximately 110m from the closest part of proposed Block A with the existing Premier Inn hotel and The Lansdowne Building (commercial) situated between the sites.

8.139 The Daylight/Sunlight for the current One Lansdowne application makes no reference to the 17-21 Dingwall Road site or the current application. The report does note that the rooms within Carolyn House will not harmfully affected in comparison to the extant scheme at the site (there will be betterment), and it is noted that Carolyn House is closer to the One Lansdowne site than this application. The independent consultant who has assessed the One Lansdowne application has commented that whilst it would have been pragmatic if the 17-21 Dingwall Road site had been included in the testing, its exclusion would not change the outcome of the testing. Therefore, officers are comfortable with regards to the proposed development on this nearby development site.

Cambridge House (16-18 Wellesley Road)

8.140 Permission has been granted, and works are on-going on site for the erection of a 26-storey residential development (reference 16/03368/P). The building is separated from the application site by Southern House, which in the most part removes risk of any material daylight/sunlight effects, particularly to the lower floors. The 25-degree line test has been utilised in respect of windows to the upper floors of Cambridge House which could potentially have a view beyond Southern House.

8.141 The assessment shows that almost the entirety of the proposed scheme falls below the 25-degrees test with only the parapet (top 5m of the front tower) breaching the line. Given the distance between and offset from this proposed development, it is accepted that no additional detailed analysis is required.

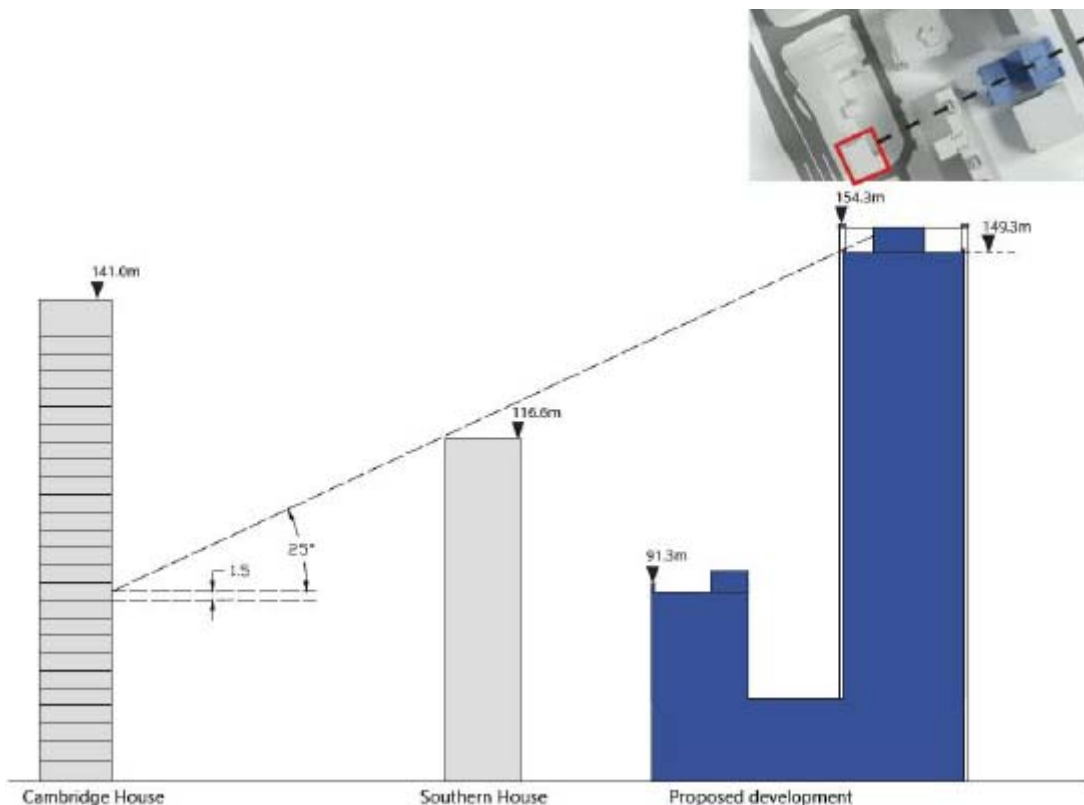


Image 18 – Impact on development on Cambridge House

Emerald House

- 8.142 Emerald House is located to the north of Lansdowne Road with windows oriented south towards the application site. The building is separated from the application site by Carolyn House and the Premier Inn hotel.
- 8.143 In terms of daylight levels, there are no noticeable changes between the current proposal and consented position. Shifts in VSC are between 0.1% - 0.4% which would be imperceptible to the residents. Similarly, the vast majority of rooms show no shift in the no-sky line/daylight penetration.
- 8.144 In respect to direct sunlight, the APSH results show no change to the majority of rooms with some localised shifts of 1% APSH. These shifts would be imperceptible. The affected spaces retain ASPH levels well in excess of the BRE target 27% with at least 5% during the winter months.

Overall daylight and sunlight impacts

- 8.145 Overall, the above demonstrates that there would be no harmful impact on neighbouring residential properties in relation daylight and sunlight in comparison to the previously consented scheme on the site.

Outlook and Privacy

- 8.146 The orientation of the proposed building in relation to the surrounding residential buildings helps to mitigate against any direct overlooking and reduction in outlook for neighbouring occupiers. As a result, the window-to-window separation is at least 25 metres between the rear block and habitable room windows in Carolyn House, this distance is considered acceptable. A separation distance of approximately 14m exists between the front block and the windows in the Premier Inn, this is considered to be acceptable given the distance, angular relationship and use of the Premier Inn building as a hotel. It is considered that the development would ensure no undue loss of outlook or privacy to the future occupiers of neighbouring properties.
- 8.147 Quarters Apartments and the development at Cambridge House (both on Wellesley Road) are located approximately 75m from the proposed new building and as such would experience no harmful loss of outlook or privacy.
- 8.148 Other buildings immediately adjacent to the site comprise office/commercial use and as such there is no concern in terms of loss of amenity to these buildings.

Trees, landscaping and biodiversity

Trees and landscaping

- 8.149 Local Plan Policy DM28 seeks to ensure there is not an avoidable loss of trees that make a contribution to the character of the area. Policy DM10.8 requires proposals to incorporate hard and soft landscaping.
- 8.150 There is a small row of trees at the rear of the site on the boundary with Premier Inn, given their location they are of minor consequence and do not make a notable contribution to the character of the area.

- 8.151 At ground floor level, the frontage of the site would create a new public realm, incorporating 4 large specimen native trees within landscaped pits, which would be reflective of the tree line and level of coverage that can be seen at adjacent sites along Dingwall Road. Paving would accentuate pedestrian access points to the building, reflecting existing paving used at Caithness Walk and Ruskin Square. Within the site, soft landscaping is proposed along the southern side boundary, with the inclusion of 3 trees to soften and improve the quality of the entrance spaces for future residents and users of the site.
- 8.152 The development proposes a range of podium deck / roof garden residential amenity spaces split over different levels. These spaces will provide hard landscape amenity features such as seating and play equipment, as well as beds of ornamental planting and trees (18.no) which would be suitable within a roof garden context (smaller ornamental species such as Aralia, Magnolia, Japanese Maple).
- 8.153 The proposed tree planting at street level along with smaller ornamental trees at roof level would represent a substantial increase in tree canopy cover in the townscape when compared with the existing site, compensating for the removal of trees that require removal to accommodate the construction of the new building. The tree and shrub planting would increase visual interest in the street scene and increase the biodiversity value of the local area. As the planting matures, it would have a beneficial effect on the local townscape character, particularly enhancing the streetscape along this stretch of Dingwall Road to integrate with other nearby areas of enhanced public realm.
- 8.154 London Plan Policy G5 requires submission of an Urban Greening Factor (UGF) for major applications, with a UGF target score of 0.3 for commercial and 0.4 for residential development. The measures utilised to maximise the contribution to urban greening include flower rich perennial planting, trees, green wall climbers, permeable paving, amenity grassland and a biodiverse roof which maximises species diversity through wildflower planting and brown roof areas under PV panels. These factors would also contribute positively to the quality of living space for new residents. The landscaping proposals achieve an Urban Greening Factor of 0.4 in accordance with Policy G5 of the London Plan.

Biodiversity

- 8.155 Local Plan policy DM27 seeks to protect and enhance biodiversity in the borough. London Plan Policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 8.156 A Preliminary Ecological Appraisal (PEA), comprising a desk study, an Extended Phase 1 Habitat Survey and a Preliminary Bat Roost Assessment (PBRA) was undertaken in July 2017 submitted as part of the previous permission. The habitats recorded were not considered to be suitable to support any protected or notable species. A Technical Note was provided in 2021 which verified the conditions recorded in the Preliminary Ecological Appraisal report and documents any observable changes which have occurred since 2017. The results of the walkover survey identified that all of the habitats recorded in 2017 have been cleared and the buildings demolished. The site is now dominated by bare ground and is a construction site. A further technical Note was provided in July 2022 which identified no observable changes since the 2021 walkover survey. The bare ground recorded is considered to be of negligible nature conservation value and therefore does not pose a constraint

to the proposed development. As a consequence, no specific mitigation or compensation measures are required.

- 8.157 Biodiverse wildflower planted areas are proposed throughout the scheme. Biodiverse brown roof zones will be created under the roof top PV panels and will include a variety of substrates to create a diverse range of habitats. The majority of the roof would have a biodiverse substrate of crushed brick and composted back. This will be supplemented with sand zones, cobble piles and log stacks. The system would be plug planted and seeded with suitable wildflower species. Inaccessible roof spaces will include insect, bird and bat houses. These measures will support a variety of plants, birds, animals and invertebrates. The proposals will secure biodiversity net gain in accordance with London Plan policy requirements. Full details of measures to ensure biodiversity net gain will be secured by condition.

Access, parking and highway impacts

- 8.158 Transport matters have been assessed by both Transport for London (TfL) and the Council's Strategic Transport Team at various stages of the application process.

Access

- 8.159 Pedestrian, cycle and vehicular access will all be provided from Dingwall Road with the potential for a future pedestrian access provided to the rear (west) should the adjacent site be developed in the future. Servicing arrangements are also all via the entrance to the site from Dingwall Road. There is a dedicated pedestrian route through the site which is slightly raised above the level of the vehicular access route.
- 8.160 Given the tight constraints of the site, it is recognised that the ground floor of the site needs to work hard to achieve all of the necessary access, delivery and servicing requirements of the development, whilst maintaining an active frontage onto Dingwall Road. The inner courtyard area of the development will provide 3 disabled parking bays (parking provision discussed below), an ambulance bay, refuse holding area. All servicing and delivery vehicles will be required to utilise this space for drop offs and maintenance requirements. Pedestrian access also needs to be provided to access the rear residential block, bin stores, bike store entrances and other plant rooms.
- 8.161 At the frontage of the site, vehicular and pedestrian sightlines are provided to the required standards. Additional landscaping will be provided at the front face of the building/undercroft entrance to prevent pedestrians walking within the sightlines around the access point.
- 8.162 Swept path analysis has been undertaken to demonstrate how manoeuvring for all parking bays, ambulance bay and servicing can take place within the site so that all vehicles can access and egress in forward gear.
- 8.163 An on-site loading bay is provided within the site which is suitable to accommodate a 10m rigid delivery vehicle and a 9.22m refuse vehicle. Swept path diagrams have been provided to show how a 10m rigid vehicle would navigate in and out of the loading bay. Whilst it is acknowledged that the vehicle would have minimum clearance, the tracking does show that the manoeuvring is possible. It is noted that the site will only very rarely need to accommodate a 10m rigid vehicle (e.g. large goods delivery). The largest vehicle generally expected to access the site would be a refuse vehicle and the swept path tracking shows that this size of vehicle could be comfortably accommodated. The

largest size delivery / service vehicle is expected to be a 7.5t box van which would have a reduced swept path requirement as compared to the refuse vehicle and would therefore also be able to be suitably accommodated. The Transport Statement shows how multiple 7.5t box van vehicles could be accommodated on site at any one time without inhibiting access for an ambulance or other larger vehicle movement. A Delivery and Servicing Management Plan will be required by condition and will be required to provide additional detail on the management of deliveries and the signage and control measures that will be provided within the site.

- 8.164 A Waste Management Strategy has been provided. Refuse storage for the whole development is located within the building envelope within secured areas. Separate areas are proposed for the two residential blocks and the healthcare facility. A bulky storage area is also proposed within the building envelope. Refuse vehicles can enter and manoeuvre within the site in the dedicated loading area. In terms of residential waste, the building's on-site facilities management team would be responsible for ensuring that the bins are rotated and suitably presented for collection on allocated days. A refuse holding zone is provided to facilitate this.
- 8.165 In terms of the healthcare facility, it is recognised that there could be offensive, medicinal and infection risk wastes which would need to be effectively and compliantly managed. It is proposed that the operator of the facility would provide suitable waste storage facilities as part of the fit-out. This facility should be secured at all times and an appropriate commercial waste collection contractor would be utilised to ensure compliance with relevant legislation. Adherence to the Waste Management Strategy will be secured by condition.
- 8.166 Access to Block 1 (161 residential units) and the healthcare facility is provided directly from the Dingwall Road public realm. Access to Block 2 (38 residential units) is via a dedicated pedestrian route from Dingwall Road.
- 8.167 The pedestrian route connecting Dingwall Road to the rear part of the development (and entrance to Block 2) requires users to walk through the area that is designed to accommodate vehicle manoeuvres. A delineated path is proposed, making it clear where pedestrians have priority, and giving residents (and visitors) a clear route and sightline of the residential entrance and vehicle area. To ensure that vehicle movements stay at a minimum, the applicant has amended the submission (Transport Statement addendum) to confirm that no drop-off or pick-up will occur within the site (for the healthcare or residential use). This approach would also support policy objectives to discourage car travel. One disabled bay is proposed to serve the healthcare use and it is anticipated that use of this space would be booked at the same time as any appointment to avoid double booking. The overall number of vehicle movements from this one space will not be significant, and the site is well connected by step-free public transport options.
- 8.168 The forecast residential servicing and delivery trips is expected to be approximately 12 trips per day, the vast majority of these made by motorcycles/cycles or light goods vehicles. The healthcare facility is forecast to necessitate approximately 7 total daily servicing vehicle trips, all by light goods vehicle. This amounts to 19 servicing trips daily (which is 1 less than the 2017 consented application). On average, 2 delivery/servicing trips would be generated by the development each hour across a typical weekday.

- 8.169 TRICS data has been used to qualify the expected pedestrian trips made from occupiers of the rear block. It is anticipated that on average across the day, there would be 6 residents arriving and 6 residents departing Block 2 every hour, this number at its highest during the AM and PM peaks. It is also expected that there would be a maximum of 1 trip per day by each of the residential blue badge spaces.
- 8.170 This data demonstrates that the level of conflict between pedestrians and vehicles within the site is low. The pedestrian path itself would be raised/differentiated from the vehicle areas so that it is clearly defined/delineated. Full details of the pathway will be secured by condition, alongside details of signage for pedestrians, cyclists, cars, and deliveries.
- 8.171 The proposed ground floor layout is similar to the extant permission 17/06327/FUL in that residents of the rear block walk through the site via the servicing area. Whilst the use of the site has partially changed (healthcare facility instead of commercial unit) and the number of residential units increased (from 181 to 199 units), the principle of pedestrians utilising this area is not substantially different.
- 8.172 Taking all of the above into consideration, overall officers are of the opinion that a safe pedestrian route can be provided through the site.

Parking

- 8.173 London Plan Policy T1 requires proposals to support the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport. All development should make the most effective use of land, reflecting its connectivity and accessibility to existing and future public transport, walking and cycling routes and ensuring that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 8.174 London Plan Policy T6 states that car parking should be restricted in line with levels of public transport accessibility and connectivity. Car-free development should be the starting point whereby there should be no general parking but disabled persons parking should be provided. Major residential development proposals must ensure that for a minimum of 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset, and how an additional 7% could be provided in future upon request as soon as existing provision is insufficient.
- 8.175 In terms of the Healthcare facility, there are no set London Plan standards for parking. Supporting text states that where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of current and future PTAL and wider measures of public transport, walking and cycling connectivity. Policy T6.5 requires that 6% of the total parking provision on site be designated to the healthcare use or that this element should have access to at least one disabled persons parking bay.
- 8.176 The site is in an area with a Public Transport Accessibility (PTAL) rating of 6b (on a scale of 1a - 6b, where 6b is the most accessible), as indicated on maps produced by TfL. The site is therefore considered to have an excellent level of accessibility to public transport links. The proposal is predominantly car-free with the exception of 3 disabled bays at ground floor level. Two bays are proposed to be provided for the residential use and one bay for the healthcare facility use.

- 8.177 Two of the parking spaces will have active electric charging with the remaining one space having passive provision for electric provision in the future. This will be secured by condition. Swept path diagrams have been provided to demonstrate that all 3 bays can be comfortably accessed.
- 8.178 The proposal does not meet the London Plan policy requirement for disabled persons parking as outlined above. 3% (6 bays) were originally proposed within the site (all for the residential use), however in order to facilitate the inclusion of the healthcare facility (as required by policy), 3 of the bays were removed to make way for an ambulance bay. The site and subsequent car park and servicing area at ground floor level is very constrained and as outlined above, there are numerous competing demands for this important servicing space.
- 8.179 Any further parking provision would result in the need for basement parking, which would have further eaten into the scheme viability, which as addressed above, would make the development entirely unbuildable.
- 8.180 The applicant has undertaken a review of off-site car parking in the vicinity of the site to determine the feasibility of an off-site provision to support the potential future delivery of additional blue badge parking. All of the roads surrounding the site are within a Controlled Parking Zone, with the closest unrestricted parking approximately a 1.6km walking distance away at Harland Avenue to the southeast of the site. The distance from the site makes this option unattractive and is considered unviable. The closest car park to the site is Ruskin Square Car Park which is 170m to the north and accessed from Dingwall Road, however the annual season ticket cost makes this option unviable financially. However, should future residents wish to own a car, they will have the option of paying for the season ticket. The other car parks that are closest to the site are on the other side of the A212 Wellesley Road and are therefore not considered to be an attractive option.
- 8.181 The Transport Statement Addendum provides data with regard to the uptake in blue badge parking spaces. The applicants Transport consultant WSP has undertaken a number of surveys at comparable residential schemes (x9) in recent years. These schemes are located across London and varied in scale but would likely attract a similar demographic to the proposed development. Across all 9 sites surveyed, a total of 66 blue badge bays were provided, with only 1 blue badge bay occupied by a blue badge permit holder. 8 out of the 9 of the sites surveyed, experienced 0% parking occupancy of the blue badge spaces provided. Use of the blue badge spaces was observed for just 1 out of the 9 sites surveyed and for this particular site, a total of 5 blue badge spaces were provided and only 1 of these was observed to be in use. The addendum notes that the number of blue badge holders has been declining nationally year on year since 2010 when the eligibility criteria was reformed.
- 8.182 Whilst the above information is somewhat anecdotal, it provides some comfort that the provision of blue badge parking from the outset is expected to be able to accommodate demand from residents of the scheme.
- 8.183 The parking provision for the healthcare facility is in line with London Plan Policy requirements (one disabled parking bay). An ambulance bay is provided within the site in accordance with NHS requirements. Given the tight constraints of the site and excellent accessibility levels by public transport and as a result of its central location, no other parking facilities are proposed for this use.

8.184 Not all patients with mobility impairment will travel via ambulance and some will therefore need to either drive to the site or use alternative travel modes. No pick-up or drop-off will be permitted within the site (for both the residential and healthcare use), with the exception of the one blue badge bay provided on site. Therefore patients will either need to travel to the site via the excellent local public transport services or by other modes. Patients travelling by car will be able to pick-up / drop-off on local streets, including:

- Via Wellesley Grove to the rear of the site. A pedestrian route of circa 160m is provided to the south of the neighbouring Renaissance building. Due to the one-way system and no right-turn provided from the A212 South, Wellesley Grove would be more attractive for trips via the north of the site.
- Altyre Road: To the south, Altyre Road is available, with this being a 400-metre walking distance from the site.

Or they could make use of town centre car parks, the closest being Ruskin Square Car Park which is 170m to the north of the site which contains 24 blue badge bays.

8.185 As the future operator of the health facility is not yet confirmed, the exact arrangement for how the blue badge bay within the site will be managed cannot yet be confirmed. Further detail in this regard will be sought and finalised by condition prior to any occupation of the site.

8.186 It is noted that existing public transport infrastructure in the immediate locale provides step free accessibility on local buses and at East Croydon station. Given the convenient location of the site to these services, disabled users would have easier accessibility to sustainable services and influence their travel away from the use of private vehicles.

8.187 The Croydon Local Plan requires major developments to provide car club spaces. Given that the previous consent did not include this on-site, and that there are spaces within the vicinity, s.106 obligations are recommended requiring car club memberships for new residents, and a sustainable transport contribution to provide sustainable transport measures, including car club provision.

8.188 In terms of mitigation, a financial contribution will be sought to put towards wider sustainable transport improvements. This will include improvements which may include the provision of 2 car club bays in central Croydon and associated EVCPs alongside improvements to the walking and cycling environment.

8.189 As well as this, it will be important to restrict access to resident's car parking permits and season tickets for Council car parks for future residents.

8.190 A Framework Travel Plan was provided with the application as originally submitted. The Travel Plan is a long-term management strategy for the development that seeks to integrate proposals for increasing sustainable travel by the future occupiers which will be regularly reviewed by the future occupiers of the site. The Travel Plan involves identifying an appropriate package of measures aimed at promoting sustainable travel, with an emphasis on promoting alternatives to the private car. These measures include the following:

- Appointment of a Travel Plan Coordinator (TPC) by the Facilities Management company prior to occupation of the development;

- Production of a Travel Leaflet/ Residential Welcome Pack promoting alternative modes of transport and the key services provided through the Travel Plan, to be distributed electronically to all employees and residents and on notice boards
- Provision of long and short stay cycle spaces
- Provision of changing facilities, showers and lockers
- Promotion to occupiers the benefits of cycle to work schemes and flexibility working practices
- Undertaking travel surveys at years one, three and five after initial occupation

8.191 The Travel Plan will need to be updated to reflect the most recent iteration of the scheme and it will need to be monitored which will be managed through the S106 Agreement.

8.192 Officers have weighed up the competing material planning considerations including the significant benefit of the inclusion of the much-needed healthcare facility as part of the development. Officers have considered all of the above supporting information and other mitigation measures proposed. On balance, officers consider that the shortfall of blue badge parking in this highly accessible location, is in this instance accepted. It is noted that both TfL and Strategic Transport have not objected to this provision.

Cycle parking

8.193 London Plan Policy T5 requires development to remove barriers to cycling and secure provision of appropriate levels of cycle parking which is fit for purpose, secure and well-located.

8.194 Safe and secure cycle parking will be provided within the proposed development to encourage cycle ownership and travel.

8.195 For a healthcare facility, the London Plan requires 1 long stay cycle space per 5 FTE staff and 1 short stay space per 3 FTE staff. The Transport assessment outlines that there will be approximately 40 full time staff associated with the proposed healthcare facility. Employees will work on a shift pattern and therefore arrival and departure times will vary widely. Patients will typically include local residents. For the maximum number of staff, the scheme is required to provide 8 long stay and 13 short stay spaces.

8.196 Long-stay cycle parking for the healthcare facility will be located on the ground floor where 3 Sheffield stands providing 6 spaces are proposed. Whilst this falls short of the London Plan requirement (13), the work pattern of staff would be staggered visitors are likely to have appointments at different times, and therefore it is unlikely that there would be a demand for the maximum requirement at any one time. The provision is based on 30 staff on site at any one time and the provision is considered acceptable. The Transport Assessment Addendum states that shower and locker facilities will be provided for staff of the health care facility.

8.197 For residential development, in terms of long-stay provision, the London Plan requires 1.5 spaces per 1bed 2person unit and 2 spaces for all other units. This equates to a minimum requirement of 341 spaces, which would be provided. Long-stay residential cycle parking will be provided in 6 separate rooms on the first floor for Blocks 1 and 2. The proposed 341 cycle parking spaces include 16 Sheffield stands, 4 of which would be suitable for wider/adapted bikes. A cycle lift is provided in each block and bicycle store stairs also provide in Block 1. Full details of cycle parking will be secured by condition.

8.198 In terms of short-stay provision, the London Plan requires a total 6 spaces for the residential element of the scheme and 13 spaces for the maximum number staff. As noted above, the work pattern of staff would be staggered. 6 short stay spaces are provided to the front of the site (in the form of 3 Sheffield stands) and 8 short stay visitor spaces are provided at ground floor level to the side of the building in the form of 4 x Sheffield stands, equating to 14 spaces in total.

Impact on highway network

8.199 The Transport Assessment submitted with the application has made a detailed assessment of trip generation from the development for different modes of transport. A comparison has been made between the current proposed scheme and the development that was permitted in October 2018 (under 17/06327/FUL). The previous permission found the impact of the scheme on the highway network to be negligible. The Transport assessment has been updated during the course of the application to also account for the trip generation that would result from the inclusion of the healthcare facility.

8.200 In total, taking into consideration all modes of transport/travel, the development is expected to generate 132 two-way trips in the AM peak hour (8-9am) and 216 trips in the PM peak hour (5-6pm).

Mode	Weekday AM Peak (08:00-09:00)			Weekday PM Peak (17:00-18:00)		
	In	Out	Two-way	In	Out	Two-way
Car Driver	0	2	2	2	0	2
Car Passenger	0	1	1	0	0	1
Taxi	0	0	0	1	1	2
Motorcycle	0	0	0	0	0	0
Bus	11	7	18	15	22	36
Rail	17	37	54	38	35	73
Cycle	1	1	2	2	3	5
Walk	10	26	36	37	33	70
Tram	9	9	18	12	15	28
Total	48	83	132	108	108	216

Table 3 Proposed total trip generation (peak hour)

8.201 The assessment identifies that the development proposals are expected to generate up to 2 two-way vehicle trips during the AM and 2 two-way vehicle trips in the PM peak hours. This level of trip generation is not expected to result in capacity issues on the local highway network.

8.202 In terms of effects on the pedestrian network, a greater number of trips are expected as a result of the increase on residential units and inclusion of the healthcare facility, however this increase can be accommodated by local pedestrian infrastructure and as such the development is seen to be negligible in this regard. The proposal would see a marginal increase in terms of cycle movements compared to the previous scheme.

The site is well placed to connect to the extensive network of cycle routes in the vicinity (directly accessible from the site itself).

- 8.203 The scheme would have an increase in public transport trips in comparison to the extant permission. The residential use would generate 52 AM peak and 60 PM peak public transport trips (bus, rail, tram). The healthcare use would generate 38 AM peak and 77 PM peak public transport trips (bus, rail, tram). Given the extensive options and services available for these modes of transport, the overall impact would be able to be accommodated by the public transport network.
- 8.204 The scheme will generate additional trip generation, especially to the public transport network. Transport for London have commented that this should be mitigated by a financial contribution of £110,000 towards improvements and upgrades to the local public transport network. As well as this, management plans are proposed to regulate the servicing and deliveries and also to encourage sustainable travel. These measures would all be secured and enforced by condition as well as monitored and reviewed as part of the S106 legal agreement.
- 8.205 The Transport Assessment (TA) is in line with the Healthy Streets approach and includes an Active Travel Zone (ATZ) assessment, which makes suggestions for some areas of improvement to key local walking routes from the site in accordance with the ten Healthy Streets indicators. Safety improvements will be considered and secured via the sustainable travel contribution within the S106 legal agreement.
- 8.206 The proposal provides a 4-metre-wide tram safeguarding zone required by TfL to allow for the potential future expansion of the Tramlink Network. The access has been designed to allow for a car to pull into the site clear of the future footway/ tram tracks should the access gate be closed.
- 8.207 To ensure there is no adverse impact on the highway network during construction, a Construction Management Plan will be sought via condition prior to the commencement of any works being undertaken on site.

Flooding

Flood Risk

- 8.208 The site is at low risk of surface water flooding and has potential for groundwater flooding of property situated below ground level. The site is within Ground Water Source Protection Zone II (outer zone). As this is a major application a Flood Risk Assessment is required under Local Plan Policy SP6.4 and London Plan Policies SI 12 (Flood risk management) and SI 13 (Sustainable drainage).
- 8.209 A Flood Risk Assessment and Drainage Strategy has been submitted. The report sets out a strategy for managing runoff from the various parts of the site in the form of blue roofs for part of the roof area and geocellular attenuation tanks and discharge to surface water sewer at a controlled rate. Thames Water have confirmed that they have no objection to the proposal with regard to surface water network infrastructure capacity.
- 8.210 The Lead Local Flood Authority (LLFA) has reviewed the submitted information. They initially required further information which was supplied by the applicant and as such the LLFA have no objection to the proposed drainage strategy. The submitted strategy and overall approach meets with LLFA requirements and demonstrates that

appropriate SuDS measures have been considered and implemented where feasible. Adherence to the strategy shall be secured by condition.

8.211 It is noted that Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have confirmed that there will be sufficient capacity in their clean water network to serve the first 100 residential properties, however capacity cannot be confirmed for the whole development of 199 residential units and healthcare facility. Once planning permission is granted they will start a network modelling capacity study for the development. As such they have requested a condition be imposed on any permission granted to ensure that the development is not occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. This is to ensure that the development does not lead to no/low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Said condition will be imposed on any permission.

Environmental Impacts

Contaminated land

8.212 The submitted information with regard to contaminated land comprises the same documents that were submitted under 17/06327/FUL and 19/00682/DISC (Partial discharge of Condition 24 (contaminated land) attached to permission 17/06327/FUL. In the assessment of 17/06327/FUL it was recognised that there may be potential soil contamination risks mainly associated with the sites former use as railway land and subsequently an appropriately worded condition was imposed requiring intrusive investigation to be carried out.

8.213 Information was submitted under reference 19/00682/DISC to discharge Condition 24 of 17/06327/FUL. This was only partially discharged as it was not considered that the submitted Remediation Strategy within the site investigation report was satisfactory.

8.214 Therefore a condition will be required to be imposed to ensure a satisfactory remediation strategy and verification report (Parts 2 and 3 of Condition 24 of original app) is submitted.

8.215 A representation has been received which refers to asbestos concerns. The Councils contaminated land consultant notes that fibres of Chrysotile were detected in 1 sample of the Made Ground at the site. However, quantification identified only trace concentrations of asbestos (< 0.001 %) in the sample so the risk is not considered significant. Due to the objection received, the consultant requested additional information with regard to what survey documents has been provided with regard to asbestos (considering that demolition had already occurred onsite). The applicant provided a number of relevant documents including method statements and reports. The Council's consultant has inspected the information provided and given the thoroughness of information provided, is satisfied that any concerns with regard to asbestos have been adequately addressed.

Air quality

- 8.216 London Plan Policies SI 1 'Improving air quality' and GG3 'Creating a healthy city' require developers to seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution. Development proposals must be at least Air Quality Neutral. Local Plan Policies DM16 'Promoting Healthy Communities' and DM23 'Development and Construction' seek to ensure that development will not be detrimental to the health, safety and amenity of users of the site or surrounding land, are air quality neutral and do not lead to further deterioration of existing poor air quality and ensure any necessary mitigation measures are put in place.
- 8.217 An Air Quality Assessment has been submitted which assesses the potential air quality impact of the proposed development and assess potential exposure of future residents to ambient pollution concentrations.
- 8.218 In relation to construction activities, the assessment identifies medium risk of dust emissions during earthworks, construction activities and vehicle trackout. However, through good site practice and the implementation of suitable mitigation measures, the effect of dust and particulate matter would be significantly reduced meaning that the residual effects by construction activities on air quality would be negligible. Similarly, the residual effects of emissions to air from construction vehicles and plant on local air quality will not be significant.
- 8.219 The assessment of the potential exposure of future residents to poor air quality found that concentrations at proposed receptors are below the relevant Air Quality Standard. Therefore no specific mitigation should be required for the protection of new occupants. There are measures incorporated into the development design that will benefit local air quality e.g. car free development, promotion of sustainable travel via Travel Plan, provision of cycle parking, electric charging facilities, and new landscaping achieving the required Urban Greening Factor. The development is not anticipated to have an adverse residual effects on local air quality once operational and future residents are not anticipated to be exposed to poor air quality.
- 8.220 The results of the Air Quality Neutral Assessment show that the development is compliant with the building and transport emissions benchmarks for NO_x and particulate matter and therefore the proposed development is air quality neutral.
- 8.221 The Council's Environmental Health Officer has raised no objection to this aspect of the proposal. The recommended mitigation measures within the Air Quality assessment should be secured via condition. An Air Quality Dust Risk Assessment (AQDRA) should be provided which will include a commitment for the purposes of monitoring and enforcement, this will be secured by condition. In addition, because of the increasing relative contribution of non-road transport sources of emissions of air pollution to breaches of the air quality objectives and the exposure reduction target, the Council considers that all development should play a greater role in improving air quality. The Council therefore seeks a contribution towards an air quality fund which funds actions in the Council Air Quality Action Plan, this will be secured via a Section 106 Agreement.

Noise

- 8.222 The application is accompanied by an Environmental Noise Assessment which indicates that the internal noise conditions for future residents will be acceptable provided that appropriate noise mitigation measures are put in place in the form of appropriately specified façade elements (i.e. glazing and ventilation). The report recommends that a further assessment should be undertaken post planning approval, to allow final specification of necessary glazing and ventilation requirements for installation on an apartment by apartment/ facility by facility basis.
- 8.223 The report outlines appropriate noise level limits for any fixed / mechanical plant and commercial operations that may be introduced as part of the development and that suitable conditions should be incorporated to ensure a commensurate level of protection for both existing receptors and those that would be introduced as part of the scheme. As such it is recommended that compliance with the measures identified in the report and details of any plant and machinery be secured by condition.
- 8.224 As a large-scale development, the construction phase would involve very large-scale operations and construction time is likely to be elongated. As the potential for significant adverse environmental effects during this phase is large, a Construction Environmental Management Plan would be secured by condition.

Wind microclimate

- 8.225 Croydon Local Plan Policy SP4.6 states that tall buildings will be required to minimise their environmental impacts. Paragraph 6.71 of the Croydon OAPF states that new buildings, in particular tall buildings, will need to demonstrate how they successfully mitigate impacts from micro-climate conditions on new and existing amenity spaces. In particular, new tall buildings in the Croydon Opportunity Area will need to show how their designs do not have a negative impact on wind (downdrafts and wind tunnelling), aligning with Policy D9 of the London Plan 2021.
- 8.226 The wind microclimate impact is considered in relation to both future occupiers, adjoining occupiers and users of the adjoining highway. The methodology adopted for the study predicts air flow patterns and wind velocities around the proposed development, using wind data from the nearest suitable meteorological station and the recommended comfort and safety standards (the Lawson Criteria). This defines the type of activities for which the wind conditions would be safe and comfortable.
- 8.227 The boundary layer wind tunnel study allows the pedestrian level wind environment at the site to be quantified and classified in terms of suitability for current and planned usage, based on the industry standard Lawson criteria for pedestrian comfort and safety. The study combines measured pedestrian level wind speeds at key areas in and around the site with long-term wind frequency statistics to determine the probability of local wind speeds exceeding comfort and safety thresholds for a range of common pedestrian activities based on the industry standard Lawson criteria.
- 8.228 The results of the baseline comfort and safety assessments show that generally, the site and its immediate surrounding areas are suitable and safe for the intended use. Whilst the baseline condition does identify some zones of the surrounding areas where winds speeds tend to accelerate, the results show that generally the wind environment remain unchanged when the proposed building is taken into account. Recommended criteria for safety are not exceeded and the wind environment at the street-level remains safe for all pedestrians. The microclimate study uses Computational Fluid Dynamics (CFD) which is no longer a methodology accepted by the Council because

it does not take all “real world” conditions, such as gusts, into account. It is a material consideration that permission was previously granted for a building on the site, which can still be built. Therefore, the application would only warrant refusal on this basis if additional impacts were identified. The site is opposite the Ruskin Square redevelopment, which includes the recently constructed Home Office building amongst several others, and the planning application for Plot B02 (ref 15/01289/RES) demonstrated through wind tunnel testing that the cumulative impact for both developments coming forward would not result in the application site requiring any mitigation to achieve appropriate Lawson comfort levels. Therefore, no mitigation is needed in this regard.

8.229 The wind safety and comfort assessment results of the proposed balconies and terraces shows that the large majority of receptors would be comfortable and safe during the whole year, however the communal terrace on Floor 17 would experience windier conditions in exceedance of the safety criteria without appropriate mitigation in place. Mitigation of this area is therefore required to bring the wind conditions within the recommended threshold for safety and comfort. The mitigation strategy comprises the introduction of an additional 2m high perimeter screen which would mirror the approach taken to the upper terrace (roof top amenity area of the frontage block). This mitigation will be secured via condition.

Sustainable Design and Construction

Energy efficiency

8.230 Croydon Local Plan (2018) Policy SP6.3 seek high standards of sustainable design and construction from new development to assist in meeting local and national carbon dioxide reduction targets. New-build residential development of 10 units or more should achieve London plan requirements for energy performance, and new-build non-residential development of 1000sqm and above should achieve a minimum of 35% carbon dioxide reduction beyond Building Regulations Part L (2013). Policy SP6.2 expects high density residential development to incorporate site wide communal heating systems.

8.231 London Plan (2021 Policy SI 2(A) (minimising greenhouse gas emissions) requires all major development to be net zero-carbon, reducing greenhouse gas emissions and minimise both annual and peak energy demand in accordance with the energy hierarchy: (1) Be Lean, (2) Be Clean, (3) Be Green and (4) Be seen. In line with Policy SI 2(C) major development should be net zero-carbon with a minimum on-site reduction of at least 35% beyond Building Regulations Part L (2013), with any shortfall to be offset through a financial contribution. Policy SI 2 (F) requires submission of a whole life-cycle carbon emissions which demonstrate actions taken to reduce life-cycle carbon emissions. Policy SI 7 requires schemes to promote circular economy outcomes and aim to be net zero-waste.

8.232 The Energy Strategy submitted demonstrates that the proposal has been prepared in accordance with relevant strategic and local planning policies to provide a high quality and sustainable building in this key central location. The design approach aligns with the principles of the energy hierarchy, achieving a total reduction in regulated carbon dioxide emissions of 46% over the Target Emissions Rate (TER) through Be Lean, Be Clean and Be Green measures. A combination of Be Lean measures include energy-efficient building fabric, insulation to all heat-loss floors, double-glazed windows, low-energy lighting and efficient heating and ventilation systems. In terms of

Be Clean measures, in order to future proof the development so that connection to a district heat network is viable (should one become available in the future), a hybrid air system heat pump/gas boiler system (70/30 split respectively) to serve the heating and hot water demands for all parts of the development is proposed. The renewables contribution will be maximised by the inclusion of solar photovoltaics to suitable roof space.

8.233 The strategy has been reviewed by the Council's Sustainable Development and Energy Team who have confirmed that the strategy is fully compliant with London Plan /GLA targets and requirements. Both the domestic and the non-domestic parts meet the minimum fabric efficiency and minimum on-site reduction targets. The remaining regulated carbon dioxide emissions shortfall would be covered by a carbon offset payment (calculated at £338,854) which would be secured through the S106 legal agreement.

8.234 Whilst no existing district heating networks currently exist, the site is within an area where one is planned. The s.106 legal agreement will ensure the development makes provision to facilitate the future connection to a proposed heat network, should one come forward. The obligation requires connection to the District Heating System if the Council has appointed an operator before commencement on site. On this basis, as the proposal complies with the above requirements regarding carbon reduction and a CO2 offset payment, subject to a condition requiring the above standards to be achieved and the financial contribution secured, the proposal is considered acceptable.

8.235 In addition to the high energy efficiency and fabric performance, the dwellings will also have a water consumption limit of 110 litres/person/day using water efficiency fittings and secured by condition.

Whole Life-Cycle Carbon Assessment

8.236 A Life Cycle Carbon Assessment (WLCA) has been provided to capture the developments carbon impact, as required by Policy SI 2 of the London Plan (2021). A WLCA assesses the environmental impacts of a building over its life cycle. It includes activities from all stages of a building's life cycle, from the extraction of raw materials and their production and the distribution of energy, through the use, reuse, and final disposal.

8.237 The proposed design includes the following measures, intended to reduce the whole life carbon emissions:

- Recycled binders within the concrete
- Reduced volume of concrete is possible
- Façade design – the proposed brickwork cladding system requires little to no maintenance over its life and can often be reclaimed at the end of the buildings life.
- Construction materials to be sourced from suppliers as close to the site as possible,
- Best practice procedures to be followed when installing refrigerant pipework for heat pump
- Comprehensive maintenance and repair schedule to ensure all equipment and materials last their full lifespan.
- Energy strategy follows the energy hierarchy 'Be Lean, Be Clean, Be Green'. The development employs an efficient building fabric, including well insulated walls and highly efficient glazing, efficient systems, heat pumps and PV Panels to maximise carbon savings for the site.
- Low flow fixtures and fitting for water usage

8.238 The GLA have responded to the application at Stage 1 and explained that the assessment provides results that generally align with the GLA benchmarks, and on that basis, officers are satisfied that the building's whole lifecycle environmental impacts have been considered. The GLA have requested further clarification which the applicant will be asked to provide ahead of the Stage 2 referral; and given that the assessment is a "planning application stage" assessment, a condition is recommended requiring additional detail when the exact building materials and equipment have been specified.

Circular Economy

8.239 London Plan Policy S17 requires referable applications to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process to demonstrate how waste will seek to be minimised.

8.240 In order to achieve its circular economy goals, the proposed development will adopt or consider adopting the following measures:

- The design of the proposed development will consider opportunities to reduce material demand and conserve resources. Specifically, this project will aim to reduce material demand by using materials with recycled content, with a target of minimum 20% by material value.
- The use of post-tensioned superstructure elements (slabs and concrete frame) which can reduce the amount of material demand and on-site wastage is included in the design.
- Low-carbon, healthy and low-VOC materials will be explored during later design stages, where feasible.
- The proposed development is seeking to use precast columns and walls, which will contribute towards reducing waste generation during construction.
- Adaptability and flexibility can be considered for the design of the Services and Space layouts, to minimise waste generation during maintenance and future reconfigurations.
- A series of best practice construction measures (specified in the Construction Environmental Management Plan) will be considered when appropriate.
- Measures to substantially reduce excavation waste have been considered (i.e. the basement has been removed and the pile caps and core bases are designed with a minimum depth)
- To sustainably manage municipal waste during operation stage, an on-site segregation system is currently included in the scheme consisting of bins for refuse, recycling and food waste composting.
- The Energy and Sustainability Statement provides details on the energy and carbon targets and strategies for the proposed development.

8.241 The Circular Economy Statement sets out key commitments in line with the principles of conserving resources, increasing efficiency and source sustainability, eliminating waste and managing site waste. Officers consider the development has sought to promote circular economy outcomes and seeks to maximise opportunities for longevity, adaptability and flexibility. Recommended conditions will secure final details of the circular economy strategy.

Environmental Impact Assessment

8.242 As part of the previous application submission, an Environmental Impact Assessment (EIA) screening opinion was submitted (17/05476/ENVS). It was concluded that the development and its specific impacts, in this particular town centre location, would not be likely to result in significant effects on the environment (noise, emissions, wind microclimate or other aspects as defined by the Regulations). As such, the proposal is not considered to represent 'EIA Development'.

Fire safety

8.243 Policy D12 (Fire safety) of the London Plan requires all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

8.244 In relation to the initially proposed information, the Council's Building Control initially raised some concerns with the proposed fire strategy. Further to this, regulations have changed during the course of the application whereby a second stair core is required in tall buildings. This necessitated an internal redesign. A second stair core is now provided within both blocks. The applicant has worked with our Building Control team to form a fire strategy that meets the fire brigade's criteria as far as is practically possible at this stage of the proposals. The scheme shows how the main circulation spaces can be smoke free by separating the lift lobby from the corridors, provision of an evacuation lifts and utilisation of a ventilation system. The Council's building control officer has reviewed and raised no objection to the revised scheme planning application at planning application stage.

Other Planning Issues

Secure by Design

8.245 London Plan (2021) Policy D11 requires development proposals to include measures to design out crime that, in proportion to the risk, deter terrorism and help mitigate its effects. Croydon Local Plan (2018) Policy DM10.8 requires proposals to provide places which are safe for all users.

8.246 The applicant has worked with the MET Police Designing Out Crime Office to substantially improve the security of the site in comparison to the previous permission and current application as it was first submitted.

8.247 Most significantly, MET Police predominately raised concern to the open nature of the site, given the inclusion of the future through route to Southern House at the rear. The layout includes a large undercover parking/serving area which would not be visible within the public realm, which therefore posed a significant threat in terms of potential for crime. A gated access is now proposed which would only allow access to residents and other users of the site. The enclosure of this space has greatly relayed MET Police concerns.

8.248 It is noted that the inclusion of the through-route is seen as a benefit of the redevelopment of this site, improving pedestrian permeability from the station to the main town centre. It will be required that provision of the route be secured via a Section 106 agreement, however its implementation which will be dependent upon a future redevelopment of Southern House or agreement with neighbouring landowners. Were the route to be realised in the future, a condition/ the s106 would be appropriately worded to ensure the gate remains open at only certain times of the day to allow the public access through.

- 8.249 Other amendments to the scheme have been undertaken in response to comments from the MET Police. This includes the provision of fencing along the rear boundary of the site, alterations to the location of accesses to cycle stores and doorways to reduce accessibility to the covered undercroft as far as possible. The cycle storage areas have also been broken up to limit the number of cycles in each space.
- 8.250 The proposed building would have a sensitive relationship to other adjacent buildings in this metropolitan part of central Croydon and as such a condition will be imposed to secure safety and resilience measures for the building.
- 8.251 In terms of the healthcare facility, there is limited detail at this stage to enable the MET Police to provide comment. A condition would be imposed on any planning permission requiring the internal layout of the healthcare facility to be submitted and approved by the local planning authority in conjunction with the MET Police to ensure the proposal does not pose a risk in terms of safety and security. A condition requiring the development to achieve Secured by Design accreditation will also be imposed.

Tall Buildings- Telecommunications and aircraft

- 8.252 London Plan Policy D9 states that tall buildings, including their construction, should not interfere with aviation, navigation, or telecommunication. A Television/Radio Signal Survey and Reception Impact Assessment has been provided. The assessment confirms that the development could cause minor short-term interference to digital satellite television reception to localised areas to the immediate north-northwest of the site. However, a S106 legal agreement clause is recommended to ensure that any potential adverse impact is mitigated at the applicants cost.
- 8.253 Tall buildings also have the potential to pose hazards to aircraft, and for this reason aviation bodies within this region have been consulted. None have raised concerns, subject to the imposition of conditions and informatives, and the development is therefore considered acceptable in this regard.

Solar Glare

- 8.254 The purpose of a solar glare assessment is to consider the potential risk of glare interfering with visual performance thus creating the risk of accidents. The likelihood or significance of such a risk is dictated by the number of local receptors and the regularity of the phenomenon occurring and the materiality of the proposals.
- 8.255 The façade of the proposed building is predominantly brickwork which is not a specular or reflective material. The potential risk of any glare is considered to be too limited to present a potential risk. Further, there are no immediate receptors that would be sensitive to glare effects. The scheme is significantly offset from any road junction and approximately 140m away from the rail line serving East Croydon Station.

Health Impacts

- 8.256 DM16 of the Croydon Local Plan seeks to ensure promotion of healthy communities through the planning system. A Health Impact Assessment was submitted to assess and identify the potential positive and negative impacts and likely effects of the proposed development on health and wellbeing in accordance with the National Planning Policy Framework, the London Plan 2021, and the Croydon Local Plan 2018.

- 8.257 The scheme provides a new healthcare facility alongside a mix of private and affordable housing accommodation of 1, 2 and 3 bedrooms. All dwellings have level access and 10% are wheelchair adaptable. The development is suitable for a wide range of occupants including older people, those with reduced mobility and families with young children. The proposal provides a good quality of accommodation for future occupiers, meeting London housing design standards. It provides external and internal communal facilities for future residents (children's play space, hard and soft landscaping, a gym, resident's lounge, cycle storage).
- 8.258 The development will improve and enhance the existing landscape by creating green amenity spaces, additional soft landscaping and biodiversity enhancements. The applicant has worked with the Met Police to improve the safety and security of the site.
- 8.259 The development is energy efficient and incorporates renewable energy in the form of solar PV. The Energy Strategy has been structured in accordance with the GLA's energy hierarchy. Whilst the site is located in area with poor air quality, submitted information shows how the scheme will incorporate measures to ensure that the development is air quality neutral. The development is car free with the exception of 3 blue badge parking spaces. The proposal prioritises walking and cycling and the site is centrally located in easy access to public transport and amenities. Best practice will be adhered to during construction to ensure noise and emissions during the construction phase are minimised as far as possible.
- 8.260 Taking all of the above into account, it is considered that the proposed development will contribute towards positive health outcomes within the population, particularly through the provision of an additional healthcare facility for the local area and the provision of new homes, supported by improved public realm and residential amenity spaces.
- 8.261 Planning obligations and conditions are recommended to secure measures to avoid any potential for unacceptable health impacts, for example implementation of appropriate air quality mitigation measures during construction. The development is liable for a Community Infrastructure Levy (CIL) payment to ensure that development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities.

Employment and training

- 8.262 As required by SP3.14 of the Croydon Local Plan and E11 of the London Plan, developers will be required to produce a Local Employment and Training Strategy (LETS) for the Construction Phase and/or End-use Phase as appropriate, outlining the approach they will take to delivering employment, training and apprenticeship outcomes and engagement with schools and education providers for the development.
- 8.263 In order to ensure that the benefits of the proposed development (including those required to mitigate the harm caused) reach local residents who may be impacted directly or indirectly by the proposal's impacts, a skills, training and employment strategy (both operational and construction phases) will be secured through the S106 legal agreement. The legal agreement will secure contributions of £141,500 for the construction phase and require that 20% of the jobs created from the commercial activity will be filled by Croydon residents.

Conclusions

- 8.264 The site has extant permission for a 24 storey building containing 181 residential units and some commercial space. In terms of general site layout and massing of the built form, the proposed scheme is similar.
- 8.265 The scheme proposes 199 new residential units in a highly sustainable location. The units all meet required space standards and as outlined above, overall, a good quality of accommodation is proposed. Adequate communal amenity space will be provided including a policy compliant amount of play space, a residents gym and lounge. The residential element will contribute to the Council's housing targets, which is seen as a significant benefit of the development.
- 8.266 The scheme has also been amended to include a much-needed healthcare facility in central Croydon. The amount of space proposed for the facility meets NHS general requirements. The fit out will be undertaken to accord with the future needs of the facility however it is considered that the internal configuration is flexible and adaptable for the needs of the end user. This public benefit is considered to have substantial weight in the planning balance.
- 8.267 Whilst affordable housing provision does not meet policy requirements, the submitted viability information justifies the shortfall and this has been reviewed and agreed by an independent viability consultant. The provision of the healthcare facility is a contributor to the lower offer and officers consider that the benefits of this provision are valuable.
- 8.268 The proposed building has been designed to respond to the surrounding context successfully, using high quality design, detailing and materials to enhance the street scene of Dingwall Road. New public realm is created to the front of the built form to respond to the emerging character of this side of Dingwall Road that would enhance a sense of place. Additional trees and landscaping will be provided and biodiversity net gain will be achieved in line with policy requirements.
- 8.269 It is recognised that the ground floor area needs to work hard to accommodate the competing demands of the different uses and that as a result some compromise has been made. Blue badge parking does not meet policy requirements, however information has been provided by the applicant to justify the shortfall. Given the highly sustainable location and accessibility to public transport and surrounding services, on balance, officers are satisfied with the details as submitted. All deliveries and servicing can take place on site to minimise any impact on the existing road network.
- 8.270 It has been found that the proposed building does not harmfully impact on the amenity of adjacent occupiers.
- 8.271 The building will accord with the London Plan energy hierarchy and will be air quality neutral. Suitable SuDs measures will be incorporated to ensure that the proposal will not increase risk of flooding. Further it has been demonstrated that the proposal will not cause any additional harm to the wind microclimate of the surround area.
- 8.272 With conditions and mitigation, the proposal is considered to have economic, environmental, and social benefits. It is considered that the proposal would constitute sustainable development. Residual planning impacts would be adequately mitigated by the recommended S106 legal agreement and planning conditions.

8.273 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).