

1 DETAILS OF THE DEVELOPMENT

Ref: 17/05144/PRE
Location: 4-20 Edridge Road, Croydon CR0 1EE
Ward: Fairfield
Description: Erection of a part 36, part 9, part single storey building comprising approximately 230 dwellings (Use Class C3), with undercroft car parking and associated works.
Applicant: Croydon Tower One Ltd
Agent: Martin Robeson Planning Practice
Case Officer: Jan Slominski

2 EXECUTIVE SUMMARY

- 2.1 The site is currently vacant, although planning permission was previously granted (and expired in May 2017) for a part 9 and part 23 storey building. The site is allocated in the Croydon Local Plan (2018) for an indicative 180-220 residential units.
- 2.2 A residential development of 230 dwellings is proposed, effectively subdivided into two blocks; a 36 storey tower, and an attached 9 storey block. Each block would have its own circulation core, communal roof terrace, and entrance fronting Edridge Road. There would also be an attached single storey undercroft area to the rear with parking, plant, cycles, waste storage and additional amenity space at first floor.
- 2.3 The principles of redeveloping the site have been discussed at a series of pre-application meetings, and initial drawings of the proposal have been reviewed by the Council's planning officers, the Place Review Panel (PRP), and the Greater London Authority (GLA). The proposal has also been subject to initial viability testing.
- 2.4 Discussion has been focussed on appropriate heights and massing; heritage impacts (in particular in long views); and affordable housing delivery.
- 2.5 The views of members are sought on the proposal, with particular regard to the following key issues:
- Affordable Housing
- 2.6 Initial high level viability testing has been undertaken, and further information has been requested before a formal opinion can be provided; however the initial feedback supports the applicant's intention to provide approximately 20-25% of habitable rooms as affordable housing (with a policy compliant 60:40 tenure split). The committee's views are sought on the quantum and tenure of affordable housing.
- Design and Heritage
- 2.7 The Development Plan supports tall buildings on the site in principle. Having reviewed the applicant's baseline heritage statement, PRP comments and CGI heritage views, and the verbal feedback from the GLA, officers are of the view that a

tall building on the site would be acceptable, but the proposed height should be reduced by at least 2 storeys to avoid unacceptable harm to the setting of (including views of) the Grade I listed Croydon Minster.

- 2.8 There are further impacts on townscape and heritage, in particular on the locally designated view of the Town Hall Clock Tower from North End, and the views of members are sought as to the proposed height and design of the proposal.

Highway Safety

- 2.9 The proposal would introduce up to 747 new residents onto the site, with little parking provision. People currently cross the Croydon Flyover at the north end of Edridge Road into fast moving traffic due to the lack of a direct crossing between Edridge Road and Fell Road. There are concerns that the proposed development will introduce unacceptable highway safety risks which need to be mitigated.

3 BACKGROUND

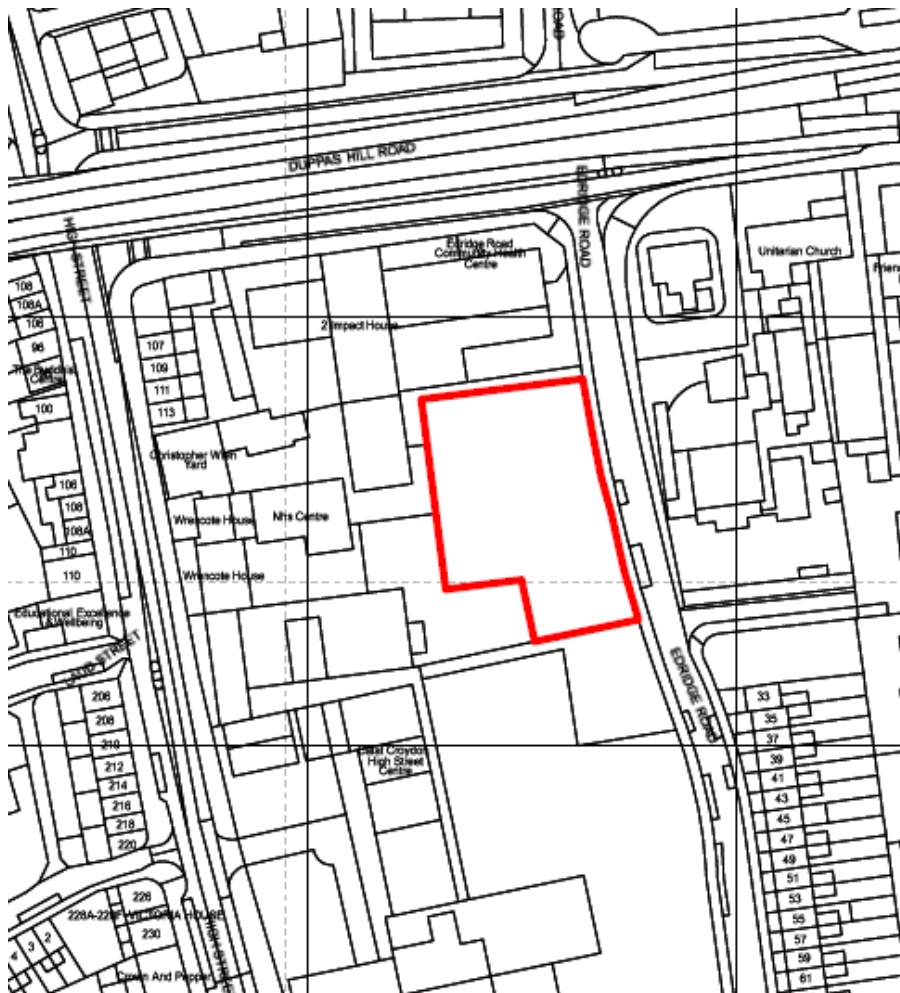


Figure 3.1 Annotated Site Plan

Site and Constraints

- 3.1 The site is on the western side of Edridge Road, south of the Town Centre's Main Retail Frontage and within the Croydon Metropolitan Centre (CMC) and the Croydon Opportunity Area (COA).

- 3.2 The site is allocated by the Croydon Local Plan for residential development. Site allocation 32 states an indicative number of homes of 180-220. The previously consented scheme was for 133 homes.
- 3.3 To the north is the Croydon Town Hall complex and the southern end of the Town Centre's Main Retail Frontage.
- 3.4 The COA Framework places the site in the "Southern and Old Town" area and the Croydon (Housing) Typologies Report (Maccreanor Lavington, 2010) identifies the site within the "Southern Gateway area" and potentially attractive to family dwellings.
- 3.5 To the south is the Grosvenor House Car Park on Edridge Road; it is not owned by the site's owner and they have been encouraged to try and purchase it.
- 3.6 Further to the south is Leon House; a 22 storey former office building which is currently being converted to residential accommodation. Pre-application discussions are taking place on a proposed scheme for the site between Leon House and 4-20 Edridge Road; which was considered by the Planning Committee on 7th June 2018. Although separate proposals, their cumulative impacts should be considered.
- 3.7 Edridge Road itself is a quiet one-way street with split character, with larger buildings adjacent to the site, and a tightly defined street edge with modest 2-storey terraced houses to the south and south east. The site has excellent public transport accessibility (PTAL 6A). Edridge Road is a Classified Road which joins Park Lane (the flyover) to the north; which is part of the TFL Strategic Road Network.
- 3.8 The site is not within a Conservation Area and there are no heritage assets on the site. It is in an Archaeological Priority Area.
- 3.9 A tall building on the site would be visible from the setting of a number of heritage assets, including Wrencote House (Grade II* Listed), St. Andrew's Church (Grade II), and Whitgift Hospital (Almshouses) (Grade I). Notably, the view of the Town Hall Clock Tower from North End is a designated view, and the view of Croydon Minster (Grade I) from Rectory Grove is identified in the Croydon Minster CAAMP SPD.
- 3.10 The site is within Flood Zone 1 (Low Risk) and partially within an area where there is potential for groundwater to occur at the surface.

Planning History

- 3.11 The site is in a heavily built up area and a number of sites nearby have been (or are currently) subject to redevelopment works.
- 3.12 Planning permission 07/05042/P was granted on the site in 2009, renewed in 2013 (12/01033/P) and expired in May 2016 for:

"Erection of a building of part 9 and 23 storeys with basement comprising offices on part ground and first floor level and 61 two bedroom, 60 one bedroom and 12 three bedroom flats; formation of vehicular access and provision of 27 parking spaces with ancillary cycle and refuse areas."

- 3.13 Impact House, 2 Edridge Road (adjacent to the north) is currently being converted to flats, following applications 16/04750/FUL, 16/02182/P and 15/02723/GPDO for change of use from offices to residential units, and external alterations.

- 3.14 The 22 storey 1960s Leon House building to the south of the site is being converted (predominantly from offices) to 258 flats, following applications 15/02926/GDPO, 15/02927/GDPO, 15/02928/GDPO, 16/01467/P and 17/04817/FUL for change of use; applications 16/01467/P and 16/06157/FUL for external alterations, and application 17/04817/FUL pending for 14 no. further residential units (272 in total).
- 3.15 Bauhaus / Centrillion Point on Mason's Avenue was extended and refurbished to provide 189 dwellings and a community/retail unit following planning application 04/03575 (approved 29 Sep 2005).
- 3.16 Other large scale proposals within close proximity include the residential-led Taberner House scheme (13 - 35 storeys, 17/01046/FUL, approved 18 Aug 2017) and residential-led Wandle Road Car Park scheme (up to 5, 22 and 25 storeys, 17/06318/FUL, planning committee resolution to grant 07/06/2018).

4 PROPOSAL

Proposal

- 4.1 The proposal is for a part 36, part 9 and part single storey residential building. The site layout is similar to the 2009 consent, although the tower element would be taller (than the approved 23 storeys) and closer to the pavement.
- 4.2 There would be communal internal spaces at ground level (residents gym, entrances, residents workspace/lounge), and outdoor amenity spaces at all three roof levels.
- 4.3 There would be vehicular access from Edridge Road to a rear single storey rear wing, with waste and cycle storage, and accessible parking spaces.

5 MATERIAL PLANNING CONSIDERATIONS

Principle of the Proposed Development

- 5.1 The site is not within a Conservation Area, and is within an area where tall buildings are acceptable in principle. There is good access to public transport, and the site allocation(s) support high density residential development. In principle, the erection of a high density residential development is acceptable.

Affordable Housing

- 5.2 The Council's planning policies in the site's location require 15% affordable housing on-site (as a policy compliant 60:40 mix of affordable rent: shared ownership) as a baseline minimum, with donor sites or a review mechanism required where less than 30% is provided on-site, and a target for individual sites of 50%.
- 5.3 Although no Registered Provider is yet involved with the proposal, the development has been designed with two cores to enable separated management and control over service charges if required. The design intention is for the lower block to accommodate affordable rent units, the taller block to accommodate market housing, and intermediate (shared ownership) units to be flexibly provided within either block.
- 5.4 At pre-application stage, a high-level viability appraisal has been undertaken, and independently assessed. The developer expects to provide 24% affordable housing (by habitable room) which would (subject to a review mechanism) deliver in excess of

the minimum requirement. Officers are working with the applicant to maximise the provision of additional affordable housing, noting the priority for affordable rent.

Townscape and Design

Place Review Panel (PRP)

5.5 The scheme was presented to PRP in June 2018 which, in summary, made the following observations:

- The scheme should not breach the parapet line of the Grade I listed Croydon Minster in Rectory Grove views, as this would set a dangerous precedent which would substantially harm its significance and Croydon's character and skyline.
- The pavement on Edridge Road is too narrow, and the building's footprint should be reduced to allow increased public realm and avoid a cramped setting.
- The lower 3-6 storeys should be improved with a plinth or podium to improve the street relationship. The proposed colonnade may jar with the scale of the two storey houses on Edridge Road, and is too small to offer public realm benefits.
- The general approach to the massing across the site (subject to appropriate height), and framed elevational treatment was supported.
- Further work is required to resolve the heritage impacts, height, detailed design, and the quality of the public and communal amenity spaces.

Townscape and Heritage Impacts

- 5.6 Since the PRP review, additional views have been provided to assess the impact on views of Croydon Minster. The Minster's pinnacles dominate views from various positions in Croydon, and contribute significantly to Croydon's skyline. The Rectory Grove view is of particular importance as it is a rare view of the whole tower. The proposal would be behind the Minster in the Rectory Grove views, and Officers are of the opinion that if the proposal "pops up" behind the pinnacles and erodes this view, the Minster's setting (which includes views) will be significantly eroded, and there is no justification for that harm. The proposal therefore needs to be reduced by at least 2 storeys to avoid completely unacceptable harm to views of Croydon Minster.
- 5.7 Even then, the proposal would be visible alongside the Minster in certain views; and there would be further, less than substantial, harm to the settings of other heritage assets and townscape impacts, for which clear and convincing justification is required (in particular the locally designated view of the Clock Tower from North End). Some of those impacts would result in "less than substantial harm" which may be justified if minimised and if sufficient benefits arise from the proposal.
- 5.8 Where a proposal leads to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. In addition to the harm to views and setting of Croydon Minster, the proposal would result in less than substantial harm to the settings of further heritage assets which must be minimised and may only be justified if sufficient benefits arise.

Layout and Massing

- 5.9 Other than the overall height, officers are broadly comfortable with the proposed massing and layout. However, there are concerns that the adjacent pavement is too narrow for a building of the proposed height, and the proposal should be amended to allow improved public realm and avoid an oppressive pedestrian environment.
- 5.10 There are also some reservations about the unusual shape of the proposed building. Whilst the “slipped” form of the building results in slender north and south elevations, the tower’s east and west elevations would be wide and care needs to contribute positively to the emerging skyline and avoid visual clutter or detracting from the central cluster of tall buildings (noting that the site is in an edge-of-centre location).

Materials, Elevations and Detailed Design

- 5.11 The proposed building would have brick elevations in a contextual “framed” design, and is supported in principle. There would be inset balconies and winter gardens which would provide a range of amenity spaces for residents, and simple elevations.

Public Realm

- 5.12 No public realm is proposed on Edridge Road, other than an enclosed colonnade in front of the entrances. Communal amenity spaces for residents would be provided at roof level. The developer has been encouraged to make improvements to the public realm to offset the townscape impact of the proposed height (noting that the proposal would be closer to the pavement than the previously approved 23 storey scheme).

Highways and Transport

- 5.13 The proposed development would permit-free and would house 747 new residents who would depend on the transport links and services in Croydon Town Centre, and will need to cross the Croydon Flyover regularly. Currently, people cross along a desire line between Fell Road and Edridge Road, where there is fast moving traffic and no crossing. A substantial increase in pedestrians walking onto this busy road would increase the risk of accidents. A potential crossing is identified within the Council’s CIL reg. 123 list, although it is not straightforward, is on a TFL road, and is easy to deliver in the short term (although there is an aspiration for it to come forward as part of the future Croydon gyratory works). The proposed development would not be liable for a CIL payment so any works necessary for the development to be acceptable in planning terms would require a separate s106 contribution.
- 5.14 The development would be permit-free, and on-site servicing is being explored. Blue badge parking and cycle parking would be provided in accordance with the relevant standards. Car club bays would also be provided (locations still being considered).

Quality and Mix of Accommodation

- 5.15 The proposed unit mix would be as follows:

Studio (1p)		1 bedroom (2p)		2 bedroom (4p)		3 bedroom (5p)	
15 units	6.4%	89 units	38.2%	91 units	39.1%	38 units	16.3%

- 5.16 Policy DM1 of the Croydon Local Plan expects 20% of units in the site's location to have 3 or more bedrooms, although before February 2021 some of those may be 4-person 2-bedroom units (subject to an absolute minimum 5% 3-bedroom units). 55.4% of units would be either 3-bedroom or large 2-bedroom units.
- 5.17 The majority of units would provide dual aspect accommodation, and either balconies or winter gardens. The applicant has been advised of the Council's expectation that all units have private amenity space, in addition to communal amenity spaces and playspace (which is to be provided at roof level). The proposed units would comply with the London Plan / Nationally Described Space Standards, and officers have provided advice on internal layouts to ensure a good standard of accommodation.
- 5.18 A sunlight and daylight assessment has not yet been undertaken, and further information has been requested to explain the impacts on neighbours.

The Impact on Adjacent Occupiers

- 5.19 The nearest adjacent residents will be at Impact House to the north, which is being converted to residential use following an application for prior approval. Those units will be mostly single aspect with poor amenity, and affected by the proposed development. Information (including a sunlight and daylight assessment) has been requested to explain the impacts on the surrounding neighbours; it is expected that those impacts will not be substantially greater than the previously consented scheme.

Environmental Impact and Sustainability

- 5.20 The applicant has been made aware of the requirements for passive design, zero carbon development, and connection to the forthcoming Croydon Decentralised Energy Network. Discussions are forthcoming in relation to air quality, overheating, surface water drainage, micro climate and lighting impacts.
- 5.21 The site is within Flood Zone 1 (Low Risk) and partially within an area where there is potential for groundwater to occur at the surface.
- 5.22 An Environmental Impact Assessment (EIA) Screening Opinion will be carried out on (or prior to) submission of a formal planning application.

Efficient Use of Land

- 5.23 To the south west of the site, is the Leon House Car Park, which along with Leon House itself is subject to Site Allocations 190 and 195, for an indicative 82-307 homes. A pre-application proposal was presented for that site at the 7th June 2018 Planning Committee meeting. Both developers have been encouraged to amend their designs to maximise space between buildings and avoid uncomfortable proximity.
- 5.24 The Grosvenor House Car Park is directly to the south, and to promote good placemaking and future regeneration and avoid planning blight, the lower floors of the proposed tower should retain the potential for future development on the Car Park
- 5.25 The applicant is aware of the need to discuss their proposal with the adjacent landowners, and to demonstrate that the proposed development would not prejudice the development of nearby sites, or result in diminished delivery of housing (in particular affordable housing) across all three adjoining sites (or the area as a whole).

Mitigation

5.26 At this stage it is envisaged that planning obligations will be required to mitigate the impacts, with the following Heads of Terms:

- Affordable housing (on-site, with a review mechanism)
- Employment and training
- Air quality
- Zero carbon off-setting (if required)
- Car club
- Travel Plan
- Transport for London contributions (if required)
- Highway works (including junction works to ensure highway safety)
- Public realm works (including paving to Edridge Road outside the site)

6 SPECIFIC FEEDBACK REQUESTED

6.1 In view of the above, it is suggested that members focus on the following issues.

1. The proposed height, including the impact on the North End designated view; Croydon Minster from Rectory Grove, and other heritage and townscape impacts.
2. The proposed quantum and tenure mix of affordable housing.
3. The design the townscape impact on Edridge Road.
4. Provisions to maintain highway safety following the proposed development.
5. The requirement for adjacent landowners need to work together to ensure that joined-up development, and to demonstrate cumulative impacts on daylight and sunlight; microclimate; and views of heritage assets.

7 PROCEDURAL NOTE

- 7.1 This is the first presentation of the scheme to the Planning Committee. The proposal is reported to Planning Committee to enable Members to view and comment on it prior to submission of a formal application. The proposal is not a planning application. Any comments are provisional and subject to full consideration, including public consultation and notification as part of any subsequent application.
- 7.2 A planning application for the proposed development would be referable to the Mayor of London under the Mayor of London Order 2008. The Mayor's views have not yet been formally sought, but the applicant has met with the Greater London Authority's officers through their pre-application advice service (including consideration by Transport for London), prior to the submission of a formal planning application.