

## Taberner House, Croydon

in the London Borough of Croydon

planning application no. 14/00196/P

### Strategic planning application Stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### The proposal

Demolition of the existing 19 storey Croydon Council office building (Class B1) and its replacement with a residential led mixed use development comprising 420 residential units (Class C3) and 465 sq.m. of commercial floorspace (Classes A1-A5) within 5 blocks, together with landscaping, servicing, new access and associated highway works.

### The applicant

The applicant is **Croydon Council Urban Regeneration Vehicle** and the architect is **Make Architects**.

### Strategic issues

The principle of a **housing led redevelopment** of the site of Taberner House is strongly supported in strategic planning terms. Concerns are however raised in respect of the proposed levels of **affordable** and **family housing, urban design**, and the proposed approach to **inclusive design**, in particular the low-level of onsite **disabled parking spaces** proposed. The **energy** and **transport** matters raised within the report also require further clarification.

### Recommendation

That Croydon Council be advised that the on-going regeneration of Croydon Town Centre is strongly supported, and whilst the application is generally acceptable in strategic planning terms, it currently does not fully comply with the London Plan for the reasons set out in paragraph 62 of this report but the possible remedies set out in this paragraph could address these deficiencies.

## Context

1 On the 20 January 2014 the Mayor of London received documents from Croydon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until the 28 February 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B and 1C of the Schedule to the Order 2008:

### Category 1A

*"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*

### Category 1B

*"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— (c) outside Central London and with a total floorspace of more than 15,000 square metres."*

### Category 1C

*"Development which comprises or includes the erection of a building where - (c) the building is more than 30 metres high and is outside the City of London."*

3 Once Croydon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The main application site (including The Queens Garden) is approximately 1.279 hectares in size and located on the western side of Park Lane. It has a substantial frontage onto Croydon Flyover to its south and Fell Road bounds the site to its west. The application site includes Taberner House, a 19 storey office building currently occupied by Croydon Council. This building will become vacant when the Council relocates its office functions to Bernard Weatherill House on the opposite side of Fell Road - which commenced in September 2013. The application site also includes The Queens Gardens, an important public open space that faces Taberner House and which is designated as Local Open Land by the Council.

6 The surrounding area is predominantly commercial and contains a number of office and civic buildings. Croydon Town Hall (a Grade II Listed building) is situated to the west of the application site and Seagas House, situated to the north of The Queens Garden, is also Grade II Listed. The northern part of The Queens Gardens is within the Central Croydon Conservation Area. There are also a number of substantial trees within The Queens Gardens, including memorial trees which the Council wishes to be retained.

7 The site is also located within the Croydon Opportunity Area Planning Framework (OAPF) which indicates that the site falls within the Mid Croydon and Fairfield character area.

8 Numerous bus services are accessible from the site on the High Street, Park Street and Katharine Street. East Croydon station interchange is also within walking distance to the north-east of the site, providing access to mainline rail services, additional bus routes and tram services. This generates an excellent public transport accessibility level (PTAL) of 6b, on a scale of 1 to 6b, where 6b is the most accessible.

## Details of the proposal

- The applicant is proposing to demolish an existing Council office building (Taberner House) to create a residential led mixed use scheme comprising 420 residential units and associated landscaping, servicing access and highway works within the following five elements:
- Block A: A 32 storey building (13,795 sq.m.) providing 230 private residential units.
- Block B: A 9 storey building providing 61 residential units (4,252 sq.m.) and 242 sq.m. of commercial floorspace (Classes A1-A5).
- Block C: A 9 storey building (2,806 sq.m.) providing 38 residential units.
- Block D: A 6 storey building providing 33 residential units (2,276 sq.m.) and 223 sq.m. of commercial floorspace (Classes A1-A5).
- Block E: A 13 storey building (4,348 sq.m.) providing 58 residential units.

## Strategic planning history

9 The applicant has engaged with the GLA pre-application process and an advice report (D&P 3245) was issued on the 15 October 2013 following a meeting at City Hall on the 24 September 2013. The applicant was advised that a residential led mixed use scheme was acceptable in principle subject to the satisfactory resolution of a number of matters including level and type of affordable housing, housing mix, density, urban design, inclusive design, sustainable development, energy and transport.

## Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- |                            |   |
|----------------------------|---|
| • Principle of development | <i>London Plan;</i>   |
| • Housing                  | <i>London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy;</i>  |
| • Density                  | <i>London Plan; Housing SPG;</i>  |
| • Urban design             | <i>London Plan;</i>   |
| • Inclusive design         | <i>London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM);</i>                                   |
| • Sustainable development  | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;</i> |
| • Transport                | <i>London Plan; the Mayor's Transport Strategy;</i>   |
| • Parking                  | <i>London Plan; the Mayor's Transport Strategy ;</i>  |
| • Crossrail                | <i>London Plan; Mayoral Community Infrastructure Levy.</i>  |

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Croydon Council replacement UDP 2006, the Croydon Council Local Plan (April 2013), and the 2011 London Plan (with 2013 Alterations).

12 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- The Croydon Opportunity Area Planning Framework (January 2013).
- The Mayor's draft Further Alterations to the London Plan (January 2014)

## **Principle of development**

13 The provision of new residential accommodation is supported by London Plan policy 3.3, which seeks to increase London's supply of housing and in doing so sets a London-wide housing delivery target of 32,210 additional homes per year up to 2021. Table 3.1 sets borough housing targets, of which Croydon's is 1,330 additional homes per year between 2011 and 2021. The FALP proposes a new target of 1,435 units per year.

14 As set out above, the site is located within the Croydon Opportunity Area, which is identified in the London Plan as being capable of accommodating at least 7,500 new jobs and a minimum of 10,000 new dwellings by 2031. The Croydon Opportunity Area Planning Framework (OAPF) was jointly prepared and published by the Mayor and Croydon Council in January 2013 and strongly supports the regeneration of Croydon Town Centre. This OAPF locates the application site within the Mid Croydon and Fairfield Character Area which it is anticipated will retain its civic and community functions, but would also include a mix of residential and leisure uses, as well as small-scale shopping and commercial space, (Croydon OAPF, Fig 4.3 – proposed land use approach).

15 The primarily residential use of this site is supported in strategic planning terms subject to satisfactory resolution of the detailed points set out in the GLA's pre-application advice note, this report, and confirmation that all the proposed housing units demonstrate full compliance with relevant Mayoral policy and guidance. However, as set out below, the design quality and amenity of the residential units, in particular at the bases of the proposed towers and between them, needs very careful design attention in order to ensure satisfactory residential quality, not least in terms of outlook, amenity and daylight and sunlight. The approach to inclusive design also fails to fully comply with the London Plan.

## **Housing**

### Affordable housing

16 London Plan policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale. The Mayor's Early Minor Alterations to the London Plan address the introduction of affordable rent.

17 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The Croydon OAPF seeks to secure a minimum of 15% affordable housing within the area its covers. This approach is expanded in Croydon's Local Plan: Strategic policies, which whilst repeating a minimum affordable housing requirement of 15% (in the period 2013 – 2016), also states that "the Council will negotiate to achieve up to 50% affordable housing within the Croydon Opportunity Area" (Table 4.1).

18 The applicant did not confirm its approach to affordable housing at the pre application stage, other than acknowledging Croydon Council's targets, suggesting that it may propose an off-site element, that any on-site affordable housing units would be "tenure blind", and that a substantial private rented component might be included. The applicant was therefore advised that the London Plan requires the maximum reasonable level of affordable housing from schemes and resists the off-site provision, and in any exceptional circumstances where this may be acceptable, specific schemes should be identified and any section 106 constructed to ensure transparent delivery.

19 The applicant was also advised that a full breakdown of affordable housing mix and quantum would be needed at submission stage, and that it should submit a detailed viability assessment that showed that the proposed level of affordable housing was the maximum reasonable amount the scheme could deliver, and that this should then be independently assessed by the Council's planning service.

20 In response the applicant has submitted an "Affordable Housing Statement" within its application that sets out that it is proposing to provide 14.3 % of the units as affordable (60 units/15% by habitable rooms). These would comprise 35 affordable rent units (61%) and 25 shared ownership units (39%) and be transferred to a Registered Provider (Places For People) upon completion.

21 The applicant also indicates that it has prepared "a robust Financial Viability Report which justifies in viability terms the overall level of affordable housing". This however has not been shared with GLA officers, nor has any independent assessment of it been provided.

22 As advised at pre-application stage, the applicant should therefore provide its viability study this study to the GLA to in order to allow officers to take a view on the proposed level of affordable housing and this should then be independently assessed by the Council's planning service and the results shared with GLA officers to allow officers to reach a view on advise the Mayor on the level of affordable housing proposed by the Mayor. It should also agree a review mechanism with the Council in order to ensure that higher levels of affordable housing would be provided should house values rise relative to costs.

#### Housing choice

23 London Plan policy 3.11 accords priority to family housing within provision. In addition, policy 3.8 and the Mayor's associated Supplementary Planning Guidance promotes housing choice and seeks a balanced mix of unit sizes in new developments. Policy 3.8 also sets out that the provision of affordable family housing is a strategic priority.

24 It is noted that Croydon Council's Local Plan and OAPF requires a mix of housing within the Croydon Opportunity Area that includes 20% three bedroom units (Croydon OAPF – paragraph 4.43). The OAPF also envisages that the Mid and Fairfield Character Area would meet this target across its entirety. The suggested provision of 9% family housing units (which is unchanged since the pre-application meeting) is therefore disappointing. It is also acknowledged that the OAPF does note that the exact level of family housing will be determined on a case-by-case basis informed by site context, site history, design potential and building height, (Croydon OAPF – paragraph 4.48). However, it is still suggested that further efforts be made to increase the proportion of family sized units within the scheme in order to better comply with the London Plan and Croydon OAPF.

25 A significant element of privately rented accommodation (230 units) is proposed which is supported in strategic planning terms.

## Density

26 London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and the public transport capacity; Table 3.2 provides density guidelines in support of this. The site has a public transport accessibility level (PTAL) of 6(b) and has characteristics of a central setting, as defined by the London Plan and therefore has a density range of 650-1100 hr/ha. The applicant was asked at pre-application stage to confirm the density of the proposal having regard to the above policy and the guidance contained in paragraph 1.3.47 of the Housing SPG.

27 The applicant suggests that the scheme's density is 1,944 hr/ha, though it is not immediately clear how this figure was arrived at, but it is very significantly above the London Plan's density guidelines. Furthermore, the applicant has incorporated the existing public open space to the north of the existing Taberner House (The Queens Gardens) of the site within its density calculation. The gardens are approximately 0.875 ha and should not be included to calculate a London Plan residential density. If this part of the application site is excluded, the actual developable site area is approximately 0.381 ha. This would mean that the correct residential density of the proposals (not taking account of the small quantum of commercial space) is in fact around 2,816 units per hectares, an even further deviation from London Plan guidelines.

28 Whilst there is not an in principle objection to high density developments – not least in Opportunity Areas with very good public transport accessibility, London Plan Policy 3.4 requires that housing output should be optimised taking into account, amongst others, the design principles of the London Plan. Paragraph 1.3.41 of the Mayor's Housing Supplementary Planning Guidance, establishes further guidance with regards to high density development, stating that such development will need to be of the highest standards of design, and provide high quality residential accommodation that is well designed, and delivers an appropriate mix of units, with sufficient play and amenity space. As detailed in the relevant sections of this report, the scheme's current design does not yet demonstrate such quality.

## **Urban design**

29 The overall bulk and massing of the scheme does not raise strategic concerns. The proposed elevations are well considered, the use of brick is welcomed, and the simple massing of the development would create an elegant and legible built form which is supported. Whilst the height of the scheme is not in itself an issue, for a building of this height to be acceptable its design needs to be of an outstanding quality, in particularly how the buildings meet the ground. As set out below, this still requires further work and refinement.

30 Specifically, whilst the approach of allowing public access to the proposed courtyard is acceptable, as was highlighted at pre-application stage, it is important to ensure that this does not result in an inward looking scheme where the quality of the frontages looking into the courtyard is prioritised over the quality of the frontages looking onto surrounding streets.

31 Officers are therefore concerned that the access to the core of north eastern building is from the internal edge of the block and not from its more public facing northern or western edges. An extensive and continuous stretch of blank frontage is also located along Fell Street. The latter matter is of particular concern as it will significantly undermine the quality of this street in this location. Fell Road is identified in the Croydon OAPF as an important route through the area that needs to be improved. The current agglomeration of back of house uses proposed undermines this and the applicant will therefore need to address this for the scheme to be considered acceptable in design terms. One potential solution would be to replace the three surface level disabled parking bays with a car lift (to basement disabled parking spaces), and to then provide additional ground floor residential or commercial accommodation in this location as set out below.

32 A number of aspects of the residential layout are well considered - such as the limited number of households sharing each landing, individual entrances for ground floor units, and cores accessed directly from the public realm. However there is concern that the scheme still has a large number of single aspect units, some of which are north facing, and also that many of the dual aspect units are compromised by their close proximity to adjacent blocks (6 metres in some cases). The applicant is therefore asked to reconsider this aspect of the scheme and provide information on floor to ceiling heights and plans showing daylight values within all such units to ensure these are of a satisfactory quality.

## **Inclusive design**

33 The applicant confirmed that all residential units will be designed to the Lifetime Homes standard and that 10% will be wheelchair accessible or easily adaptable homes. The applicant has also indicated in its Design and Access Statement that the residential units would meet the 16 Lifetime Home standards. This is welcomed.

34 However, it is not clear that the proposed wheelchair accessible homes would meet the standards set out in Annex 2 (Best Practice Guidance for Wheelchair Accessible Housing), of the GLA's Housing Supplementary Planning Guidance, nor have typical flat layouts and plans of the wheelchair accessible homes and the Lifetime Homes been provided to illustrate the relevant features, or plans provided showing where the wheelchair accessible homes would be located and how many there would be.

35 Furthermore, despite clear pre-application advice, the applicant is only proposing 3 onsite disabled parking bays. This represents less than one percent of the proposed 420 units and is unacceptably low and contrary to the Mayor's 2012 Housing SPG that states that each designated wheelchair user dwelling should be allocated a designated parking space, (Annex 3, paragraph A10). The applicant has explored options to meet this requirement and is currently suggesting that the possible provision of disabled car parking spaces within the Fairfield Halls forecourt car park (subject to agreement with Fairfield Halls and parts of Croydon Council, and also some 180m from the site) offers a satisfactory alternative to onsite provision. The applicant has also recently suggested the possibility of a dedicated disabled drivers valet service. However, neither approaches are considered appropriate solutions to the need to provide dedicated disabled parking facilities for future residents.

36 The applicant has though suggested that it could incorporate a car lift to the proposed basement should future demand arise. However, possible future provision is not considered an acceptable solution given uncertainties whether a lift might be provided could discourage and disadvantage disabled people considering whether to choose to live in the development.

37 The applicant should therefore significantly increase the number of on-site disabled carparking spaces, ideally providing in the region of 40 spaces. One approach would be to provide the basement car lift at the outset, which as set out above, would also have urban design advantages and possibly allow additional ground floor accommodation to be provided. As currently configured, the application does not comply with the London Plan in respect of inclusive design.

## **Sustainable development**

38 The climate change policies as set out in chapter 5 of the London Plan collectively require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions. All development should be undertaken with regard to the Mayor's Sustainable Design and Construction supplementary planning guidance, with the aim of achieving the highest possible level within the Code for Sustainable Homes and BREEAM. The incorporation of other sustainability features, such as SUDS and other water retention/recycling features, would be supported. The occupation of all practical areas of roof space with green/brown roofs or photovoltaic panels, in line with the London Plan's policies on urban greening and renewable energy, is also encouraged. The applicant has satisfactorily addressed these matters from a strategic perspective.

## **Energy**

### Energy efficiency standards

39 The applicant's modelling suggests that the development's energy efficiency measures will achieve a reduction of 32 tonnes per annum (6%) in regulated CO<sub>2</sub> emissions compared to a 2010 Building Regulations compliant development, as shown in the table below. However, the applicant should provide further information on the passive design features and demand reduction measures actually proposed. The demand for cooling will be minimised through optimising the glazing type and design. This will include inter-pane blinds to reduce unwanted solar gain.

### District heating

40 The applicant has carried out an investigation and there are no existing district heating networks within the vicinity of the proposed development. However, several studies into district heating in the area have been undertaken and it is possible that a heat network will be developed in the future. The applicant has, therefore, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. An existing tunnel runs into the basement opening in to the energy centre and this would be used for pipework from an external district heating network.

41 The applicant is proposing to install a site heat network linking all parts of the development. A drawing showing the route of the heat network linking all buildings has been provided. The site heat network should be secured by condition. The site heat network will be supplied from a single energy centre. This will be 270m<sup>2</sup> in size and located in the basement of the retained Taberner House. This single energy centre should be secured by condition.

### Combined Heat and Power

42 The applicant is proposing to install a 230kW<sub>e</sub> gas fired CHP unit with a 20m<sup>3</sup> thermal store as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO<sub>2</sub> emissions of 178 tonnes per annum (37%) will be achieved through this second part of the energy hierarchy (see table below).



### Renewable energy technologies

43 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. A reduction of 210 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. The CO<sub>2</sub> savings exceed the targets set within Policy 5.2 of the London Plan.

### Conclusion

44 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO<sub>2</sub>) emissions and sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the CO<sub>2</sub> savings can be verified.

## **Transport**

### Access arrangements

45 The proposals are car free except for three spaces for disabled users, which will be located within Block C of the development and accessed from Fell Road. Servicing vehicles will park on street on Fell Road, with goods transferred across the site as required. In order to reduce conflict with pedestrians and impact on the public realm, vehicles will not be permitted within the site.

46 The applicant will be required to enter into a section 278 agreement with TfL for any works to the carriageway or footway of the A232 Croydon Flyover, for either the construction or permanent phases of the development.

### Car and cycle parking

47 The site will be car free except for disabled parking provision. This is welcomed by TfL. Three spaces for disabled users are currently proposed within the site with additional spaces possibly provided within the NCP car park at Fairfield Halls. TfL is however concerned about the suggested provision of spaces within Fairfield Halls due to the distance from the site, the need to cross a major road, and the fact that the immediate or long term provision of these spaces cannot be guaranteed.

48 A total of 491 cycle parking spaces are proposed, including 461 for the residential units and 30 within the public realm for visitors. The residential provision is in line with London Plan standards. The Transport Assessment (TA) states that commercial staff will use the visitor spaces. However, TfL requests that secure cycle parking spaces are provided for staff.

### Public transport impact

49 The proposed development will create additional passenger demand on bus and tram services in the town centre. Whilst the forecast increases are not large in themselves, the cumulative impact of this and other developments in the OA is potentially significant. TfL is currently working with the Council and the GLA on a Development Infrastructure Funding Study (DIFS), which will determine the improvements required to deliver the OA growth forecasts and assess potential funding streams, including section 106 contributions. Given that this study has not yet been completed, TfL requests that an appropriate sum is secured towards future public transport capacity enhancements. TfL would welcome further discussions with the Council and the applicant on this issue.

### Cycling and walking

50 TfL welcomes the improved permeability that will be delivered as a result of the redevelopment. The site is very well connected to the local cycle and pedestrian networks and these should be appropriately signed from within the site. TfL recommends that the Council should secure an appropriate contribution towards updating the existing Legible London signage and providing additional signs within the site where appropriate.

### Servicing and construction

51 A Construction Logistics Plan (CLP) should be secured by condition and approved prior to commencement of the development. The CLP should include the impact of construction traffic, likely construction trips generated and mitigation proposed. It should also include details of site access arrangements, booking systems, construction phasing, vehicular routes and scope for load consolidation in order to reduce the number of road trips generated.

52 A Delivery and Servicing Plan (DSP) should be secured by condition and approved prior to commencement of the development. The DSP should identify efficiency and sustainability measures to be undertaken once the development is operational.

53 It is imperative that road safety measures including for cyclists are considered at the application stage and preventative measures delivered through the construction and operational phases of the development. TfL encourages the use of contractors who are registered on the FORS system. In addition details of the consideration of routes, any conflict points identified on these routes, safe loading and unloading facilities, traffic and pedestrian management equipment and cycle specific safety equipment should be provided through the CLP and DSP. Contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with other road users and pedestrians on the capital's roads.

### Travel Plan

54 TfL welcomes the inclusion of a Framework Travel Plan for the residential and commercial uses within the TA. The Travel Plan should be secured, monitored and enforced through the section 106 agreement.

### Community Infrastructure Levy

55 The Mayor of London introduced his Community Infrastructure Levy (CIL) on the 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL. The charging rate for Croydon is £20 per square metre.

56 The Council adopted their borough CIL on the 1 April 2013. The Council's regulation 123 list does not currently allow CIL to be used for transport improvements but does allow for public realm improvements for chargeable uses. Therefore section 106 contributions can still be used to mitigate the specific impacts of the development. The Council should inform TfL of their intention to collect contributions either from CIL or using conventional section 106 and this should be consistent with delivering the objectives of the OAPF and masterplans and having regard to cumulative impacts, as discussed above.

### Summary

57 The development is considered to be in general conformity with the London Plan, subject to the issues above being satisfactorily addressed prior to consent being granted – in particular the low level of disabled parking. TfL would also welcome further discussions on contributions towards public transport improvements, given the potential cumulative impact of this and other developments in the OA.

## Local planning authority's position

58 This is not known at this stage.

## Legal considerations

59 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

60 There are no financial considerations at this stage.

## Conclusion

61 London Plan policies on the principle of development, housing, density, urban design, inclusive design, sustainable development, energy and transport are relevant to this application. The application complies with some of these policies but not with others. On balance it does not yet comply with the London Plan. The reasons and the potential remedies to the issues of non-compliance are set out below:

- **Principle of development:** The proposed demolition of the existing Council offices and redevelopment of the site for a residential led mixed use scheme is supported in strategic planning terms.
- **Housing:** The applicant's viability study and Croydon Council's independent assessment should be made available before the application is referred back to the Mayor at Stage 2. The Council should also ensure that the maximum reasonable amount of affordable housing is achieved in accordance with strategic and local policy and incorporate a review mechanism should it decide to approve the application. Further efforts should be made to increase the level of family housing.
- **Urban design:** The overall design approach is supported but concerns are raised regarding access and public realm, the number of single aspect units (some of which are north facing), and the very small distances between some of the proposed blocks. All these matters should be satisfactorily addressed before the application is referred back to the Mayor at Stage 2.

- **Inclusive access:** The applicant has not demonstrated how the proposed wheelchair accessible homes would meet the standards set out in Annex 2 (Best Practice Guidance for Wheelchair Accessible Housing), of the GLA's Housing Supplementary Planning Guidance. Nor have typical flat layouts and plans of the wheelchair accessible homes been provided to illustrate the relevant features, or plans provided showing where the wheelchair accessible homes would be located. The substantial shortfall in onsite wheelchair parking spaces is contrary to the London Plan. Appropriate plans should therefore be provided to remedy these matters, and it is strongly suggested that the applicant provide a car lift to its proposed basement to very significantly increase the number of onsite disabled car carparking spaces the scheme would provide.
- **Energy:** The additional details set out above should be provided to allow the proposed CO2 savings to be verified.
- **Transport:** The transport section of this report details further work which is required to demonstrate full compliance with the London Plan.

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