

Mondial House, George Street, Croydon

in the London Borough of Croydon

planning application no.16/001180/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

The demolition of the existing building and erection of three linked blocks of 35, 13 and 11 storeys to provide 220 dwellings, office space and retail space at ground floor levels.

The applicant

The applicant is **Bridgewater Properties**, and the agent is **CAPITA**.

Strategic issues

This application raises issues in relation to **housing mix, affordable housing, urban design, play space provision, inclusive design & access, energy & sustainability, ambient noise and transport**.

Recommendation

That Croydon Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 105 of this report; but that the possible remedies set out in the paragraph could address these deficiencies.

Context

1 On 24 March 2016 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 21 April 2016 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 Category 1A and 1c of the Schedule to the Order 2008:

- *1A. Development which comprises or includes the provision of more than 150 houses, flats or houses and flats.*

- *1C. Development which comprises or includes the erection of a building of one or more of the following descriptions: (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.

Site description

5 The site is 0.58 ha site is located on George Street (Croydon) opposite East Croydon railway station/tram link interchange and is currently occupied by an office block known as Mondial House

6 The existing Mondial House building is a fifteen storey office building containing 7,401 sq.m. of B1 office floorspace and defined by George Street to the north, College Road to the west and the main London to Brighton railway line adjoins the site to the east with Croydon College located to the south-west.

7 The applicant's proposals are coming forward in context of two tall building consents, to the west of the site on College Road is a part 15, part 37 storey building (Land adjacent to Croydon College (P&D/3322)) and on George Street a part 32, part 37 storey tower (Former Essex House site (P&D/1585c)) is proposed.

8 Relevant schemes in the wider area of the application site include to the east the redevelopment of the Royal Mail Delivery Office at 1-5 Addiscombe Road for an 8-21 storey residential building approved February 2014, and the development at Ruskin Square (Land at East Croydon Station) approved for a maximum of 625 residential units, 151,000 sq.m. of office space and 10,900 sq.m. of retail. In addition to this, 250 metres to the west of the site is the proposed Whitgift Centre Redevelopment site with the development proposals seeking to provide 140,000 sq.m. of new and upgraded retail space and 600 new residential units.

9 The A232, Barclay Road / Park Lane Gyratory is 250 metres to the south of the site and forms part of the Transport for London Road Network (TLRN), which TfL is the highways authority for. The A212, Park Lane approximately 200 metres to the west of the site, forms part of the Strategic Road Network (SRN) which under the Traffic Management Act 2004, TfL has a duty to monitor the traffic flow and any potential impact. The site is above the network rail lines into East Croydon Station, and Network Rail is currently developing major plans for the area as part of their Sussex Route modernisation plan.

10 East Croydon Transport Interchange is located directly to the north of the site and provides access to several bus, tram and national rail services. The nearest bus stop is located on George Street adjacent to the site. Consequently, the site has an excellent Public Transport Accessibility (PTAL) of 6b on a scale of 1 to 6, where 6b is the most accessible.

Details of the proposal

11 The development proposals are for the demolition of the existing building and erection of three linked blocks of 35, 13 and 11 storeys to provide 220 dwellings, with office floorspace (1,787 sq.m.) and ground floor/first floor retail (490 sq.m.). The key design and development features of the building are:

- A linear stepped development massing form.
- Active ground floor frontage to George Street containing commercial units with a retail ground floor frontage and residential entrance facing onto College Road.
- A landscaped pedestrian area from building entrance on George Street wrapping around southern edge of the building as part of a wider programme of public realm works.
- Lower ground level parking for 23 blue badge/ disabled car parking spaces and 482 cycle parking spaces.
- Amenity space in the form roof terraces are located on the level 13 of block A and the roof tops of blocks A and B these also contain children’s playspaces.

Case history

12 The application has been subject to the GLA pre-application process and an advice report was issued on 30 September 2014.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------------|--|
| • Mix of uses | <i>London Plan</i> |
| • Housing | <i>London Plan; Housing SPG; draft Housing SPG Housing Strategy; Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy;</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;</i> |
| • Tall buildings/views | <i>London Plan,</i> |
| • Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</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> |
| • Ambient noise | <i>London Plan; the Mayor’s Ambient Noise Strategy;</i> |
| • Transport and parking | <i>London Plan; the Mayor’s Transport Strategy;</i> |

14 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 Local Plan: Strategic Policies DPD (April 2013), the ‘Saved’ policies of the Croydon Replacement UDP (July 2006) and 2015 London Plan (with consolidated alterations since 2011).

15 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- Croydon Opportunity Area Planning Framework (OAPF) (January 2013).

Principle of development

16 The development land use proposals are for a residential led mixed use development consisting of 220 residential units, (1,787 sq.m.) B1 office floorspace and 490 sq.m. retail floorspace.

17 The site is located within the Croydon Opportunity Area Planning Framework where development is guided by London Plan policy 2.13 (opportunity areas and intensification areas) and the rationale for the OAPF established in Table A1.1 Opportunity Areas. The Opportunity Area is identified as having employment capacity for 7,500 jobs and 7,300 new homes and the development rationale is defined as the following:

“One of the potential Strategic Outer London Development Centres, Croydon is also recognised as London’s largest ‘Metropolitan’ town centre and one of the capital’s two strategic office centres outside central London. The council’s strategy will need to be built upon to re-brand the offer of Croydon to meet modern commercial needs, realising its competitive advantages and good public transport accessibility. This will entail consolidating its strengths as a strategic office location through mixed-use re-development and enhancements to the business environment. A carefully managed balance must be struck between modernising office provision and encouraging the conversion of surplus capacity to other uses including a significant increment to housing. An integrated approach to a number of sites will be needed, including East Croydon station, Fairfield Halls, Croydon College, Park Place and the Whitgift extension.”

London plan policy 2.13 states: *“Development proposals within opportunity areas and intensification areas should:*

- a support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks*
- b seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses*
- c contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks*
- d realize scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking*
- e support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration”*

Residential

18 London Plan policy 3.3 seeks to increase London’s supply of housing and in doing so sets borough housing targets. The London Plan (2015) sets Croydon’s target at 1,435 additional homes per year between 2015 and 2025. The OAPF also notes that the area has a capacity for a minimum of 7,300 new homes. The proposals seek to deliver 220 units, which will contribute approximately 15% towards Croydon’s annual target, and approximately 3% of the indicative minimum housing target for the OA. The provision of 220 residential units is supported in strategic terms.

Office

19 The mixed-use development proposals include the re-provision of 1,787 sq.m as a proportional replacement of the Mondial House building's 7,401 sq.m. of B1 office floorspace. London Plan policy 4.2 offices states in relation to the loss of office floorspace:

"the Mayor, Boroughs and relevant strategic partners should ensure that:

a support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises

b recognise and address strategic as well as local differences in implementing this policy to:

– meet the distinct needs of the central London office market, including the north of the Isle of Dogs, by sustaining and developing its unique and dynamic clusters of 'world city' and other specialist functions and business environments, and

c consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility

d seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities in the context of policies 2.7, 2.9, 2.13 and 2.15–2.17."

20 At the pre-application stage the applicant presented two options with and without office floorspace, the former development option contained c943 sq.m. of office floorspace. GLA officers raised concern over the complete loss of commercial office floorspace and concluded that there was a need to provide a reasonable level of replacement floorspace. The current proposals include 1,787 sq.m. of B1 office within Block A on ground to the fifth floor an increase of c840 sq.m. of floorspace from the pre-application stage. This increase is welcome as it allows for a genuine mixed-use scheme to come forward that will contribute to the rejuvenation of Croydon office market in a highly accessible location. It is further acknowledged that although the current review of the Croydon Local Plan includes the proposed introduction of an office retention area, the proposals site is located outside this area and there is no need to provide like for like replacement of floorspace.

Fair Field Masterplan

21 The development site is located within the Fair Field masterplan area which was adopted as interim guidance in March 2013, hybrid application for a new masterplan and phase 1A development (D&P/3771a). The proposed scheme will fit with the parameters for the site development proposed in the masterplan.

Conclusion

22 The principle of development of a residential led mixed-use development is accepted given the Croydon OAPF and local plan policy guidance for the site and Mid Croydon Fairfield sub-area. The proposed loss of office floorspace is not in this instance and issue as the site is outside the

currently proposed office retention area and the applicant has provided a reasonable level of replacement office floorspace.

Housing mix

23 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing.

24 In this instance the Croydon Opportunity Area Planning Framework provides further area specific policy guidance, with the Mid Croydon and Fairfield character area having a requirement of 20% three bed+ units in all developments, but it is also accepted that this is not required in all schemes or appropriate to all sites.

Table 1: Housing mix (pre-application)

	Number	%
1 Bed	60	27
2 Bed	119	54
3 bed	41	19
Total	305	100

25 The development housing mix allow for 19% three bed units and 54% two bed units, although the housing mix falls marginally short of OAPF guidance the short fall is not significant and provides a good balance and choice of accommodation that is compliant with London Plan policy.

Affordable housing

26 London Plan policy 3.12 requires that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes. Negotiations on sites should take account of their individual circumstances including development viability, resources available from registered providers (including public subsidy).

27 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 'Three Dragons' development control toolkit or other recognised appraisal methodology is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation.

28 In this instance the Croydon Opportunity Area Planning Framework provides further area specific policy guidance that includes the objective of securing as a minimum 15% affordable housing. The Croydon Council local requirement in the Core Strategy is for 50% of any future housing development to be affordable housing. It is further noted that the OAPF is three years old and the housing market has changed dramatically since the preparation of the affordable housing target.

29 The applicant has completed an affordable housing viability assessment and the initial offer is the provision of 15% or 33 intermediate affordable units (shared ownership) with no

social/affordable units included in the development. This offer is contrary to London Plan policy which sets a requirement of 60% social and affordable rent and 40% for intermediate rent or sale and the applicant should explore options for social/affordable rent units – this should be achievable given the development layout of separately accessed residential blocks. 1

30 The applicant's affordable housing viability assessment should be independently reviewed on behalf of Croydon Council and shared with GLA before any revised offer is accepted. If a commuted sum for off-site provision is viewed as part of the final option to achieve policy compliant delivery of intermediate and affordable housing, this should be secured within the s106 agreement. Furthermore, Croydon Council should provide details of mechanism by which the commuted sum will be used to provide off-site affordable housing.

Housing density

31 London Plan Policy 3.4 seeks to optimise the potential of sites having regard to local context, design principles and public transport accessibility. The application should be accompanied by an estimate of net residential density and this should relate to table 3.2 of the London Plan and the PTAL.

32 The site is located in an area of high public transport accessibility with a PTAL level 6b. For central sites with such a PTAL range, the London Plan seeks a density of between 650 and 1,100 habitable rooms per hectare. The proposed development achieves a residential density of 2,742 habitable rooms per hectare (or 934 units per ha) and this exceeds the density ranges for a 'central' location set out within table 3.2 of the London Plan (2011).

33 The proposed density is considered appropriate in this instance because the Croydon OAPF (including the application site) is identified within the London Plan (2011) where development proposals should '*seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses*' (Policy 2.13). The application site is located within mid Croydon and Fairfield sub area which is identified within the OAPF for housing growth and is well located benefiting from good access to existing public transport facilities and is well designed, as set out below.

Urban design

Height, scale & massing

34 The application proposals have been through a number of design iterations which have adjusted both the building height and massing and Croydon Council have had a number of pre-application meetings with the applicant since the GLA pre-application meeting. At the pre-application stage advice was given in regards to development proposals for three linked blocks of 40, 13 and 6 storeys. The current scheme is for the same linear arrangement but consisting of buildings of 35, 13 and 11 storeys with major changes to the design and appearance.

35 The Croydon Opportunity Area Planning Framework identifies three building height areas defined as "central area", "edge area" and "outer area". The development proposals are located on a site that is situated in the "edge area" - where building heights will vary but there is scope for new tall buildings where justified. The site is in close proximity to East Croydon railway station and very near to the boundary edge of the "central area" where tall buildings are promoted and tall buildings have recently been approved on an adjacent site on George Street for the Former Essex House site (P&D/1585c) for a part 32, part 37 storey tower and to the west on College Road for a part 15, part 37 storey building (Land adjacent to Croydon College (P&D/3322)).

36 The building site is included as part of the outline planning application for the Fair Field Masterplan (D&P/3771a/01) which will establish a development guide to the comprehensive redevelopment of the area. The proposed land use, layout and building height are in keeping with the development parameters set by the masterplan guidance and therefore sits well with the wider strategic redevelopment of Fair Field.

37 Given the OAPF location context, its proximity to East Croydon Station and tram interchange and recent approvals of tall buildings in the immediate surroundings, the proposed maximum height of 35 storeys in terms of its scale relationship to surrounding buildings is supported as it will form part of a new tall building cluster in a highly accessible location.

38 The stepped linear approach to the massing of Blocks A, B and C responds to the form of the site and is an appropriate approach to forming a strongly defined edge to street and railway line. This stepping form is carried through to the tallest element the 37 storey tower and this gives the building a distinctive silhouette and reduces scale of the building.

Layout and residential quality

39 The applicant at ground floor level has the challenge of activating a primary frontage on George Street, provide an active edge to the proposed north-south route between George Street and Barclay Road and deal with the noise and air quality impact of the railway line.

40 The proposed layout has responded positively to these challenges through offering a retail and office frontage which have a double units and entrance to the offices on George Street. As requested at the pre-application stage the applicant has provided a strong activating edge to College Road to ensure the Fairfield Masterplan north-south edge route through the locating a retail units and multiple residential entrances and lobbies to each of the blocks. The ground floor layout has been designed to respond to the railway line by placing the building above a basement car park, locating cycle parking and servicing and the lining rooms of maisonette units to the this edge.

41 The development layout benefits from the being based on three adjoin blocks with separate entrances. This has resulted in a reasonable residential quality with five units accessed from each access core and the number of single aspect units have been kept to a minimum by creation of through units and stacked maisonettes.

Building appearance & materials

42 It is evident form the design & access statement that Croydon Council have worked with the applicant on refining the building appearance. It is evident that the building has its own individual appearance, but a good degree of continuity with the nearby proposed ' Land West of Croydon College' and '101 George Street' towers which together will form a distinctive tall building cluster. Key features of the development appearance are as follows:

- The 35 storey tower has a white masonry frame which is carried through to a distinctive building crown. The frame facing George Street is broken down horizontally and vertically to define the residential floors and with the office and retail space defined by areas of glazing. The College Road and the railway line elevation have more simply designs with two vertical strips of bronze tone cladding panels running from the base to top of the building and joining at the top.
- Block B is elevations of primarily grey brick, broken by balconies with single broad band of bronze tone cladding on both the railway and College Road elevations.

- Block C has darker grey brick elevations with four vertical bands of bronze tone cladding both the railway and College Road elevations

43 The 35 storey tower (block A) has a clearly defined base/middle/crown and this is reflected in the building appearance with the horizontal mixed use arrangement clearly discernible in the primary street front elevations. Blocks, A, B and C have been treated as having distinctive individual character but do have continuity of using light or dark grey brick, this has been effectively achieved and is a commendable aspect of the development. In all the buildings the entrance to the residential, office and retail uses are well defined on the building facades through use of canopies and glazing and this effectively contributes to buildings interface with the public realm.

Public realm interface and landscaping

44 The site is located in the Station Link character area of the Fair Field masterplan which is a key early achievable route from East Croydon Station to College Green and Fairfield Halls. It is therefore welcome that the scheme will contribute to the delivery of the public realm to enhance this key route.

45 The applicant has engaged with Croydon Council and the developer of adjoining sites and this has helped to ensure that the landscape proposals are cohesive and integrate with the adjacent application proposals. Sufficient information has been provided to indicate high quality materials (natural York stone and granite setts), street furniture and soft landscaping are integral to the landscape strategy.

Views and townscape

46 The Croydon Opportunity Area Planning Framework identifies four townscape views that new development proposals should be assessed against these are: Roman Way, Croydon Flyover and Wellesley Road ; The East Croydon train line; The High Streets; and Existing Parks of Wandle Park, Duppas Hill and Park Hill. Analysis of these views establishes the following impacts:

- East Croydon Line (View 05 Lower Addiscombe Road/View 07 Barclay Road/ View 11 Hazledean Road): the building will be highly prominent but it will provide a more visually attractive edge to the railway line and act as a marker to the location of East Croydon Station and its approach.
- The High Streets: *View 02 George Street*: The building will be a prominent addition to the townscape with 101 George Street (Former Essex House), its design responds positively to the street with a scaling of facade treatment on the lower floors offering a strong defining edge to the street with an active retail and office entrance frontage which are clearly brought out in the facade design. The new building will enhance the existing fragmented building line and the architectural quality and facade treatment will enhance the streetscape. *View 10 Dingwell Road*: the building will sit alongside 101 George Street (Former Essex House) effectively marking the gateway into a key pedestrian route identified in the Fair Field masterplan.
- Park Hill (View 14): The prominent view is of the stepped form of the building elevation of the building above the tree line. As other consented tall buildings are developed, cumulatively there will be a new unified urban backdrop to the setting of the park.
- Near Views: *View 15 College Green*: the proposal will be very prominent but with the adjacent to 101 George Street (Former Essex House) and Land adjacent to Croydon College

scheme towers will form part of a cluster of tall buildings marking the location of East Croydon Station.

- Distant Views: *View 11 Biggin Hill/ View 12 Addington Hills/ view 16 Stone Park Avenue/View 17 Pollards Hill/View 18 Purley Way Playing Fields.* The building will appear as part of the cluster of a new generation of tall buildings in the panorama views of the Croydon’s skyline with the tallest point being One Lansdowne Road.
- Listed building: *View 20 Croydon Minster:* the building will not be visible in this view.

Children & young person’s play

47 Policy 3.6 of the London Plan sets out that *“development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.”*

48 The applicant has used the methodology within the Mayor’s supplementary planning guidance to calculate a child yield of 26 children within the development (based on current housing mix).

Table 3: Playspace child yield

Age group	No. of children	Playspace requirement
0-4	16	160
4-11	7	70
11+	3	30
Total	26	260

49 The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. Furthermore the SPG sets out the differing types of playspace that it suggests should be required to be provided for new developments to cater for differing age-groups.

50 It is estimated that the scheme will need to provide 240 sq.m. of doorstep and Neighbourhood Playable Space and 30 sq.m. youth space with a total requirement of 260 sq.m.

51 The applicant states that a total of area of 240 sq.m. of doorstep play space will be provided in Block A roof and podium level Block B (floor 13) and Block C (floor 11), whilst this could meet requirements, the applicant should provide more details on the design of the rooftop amenity spaces and how place space features are incorporated. In relation to older age group playspace provision, in this instance, given the low requirement for 11+ age group, it is accepted that this will be accommodated offsite at The Queens Gardens and Park Hill Park.

Inclusive access

52 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, Deaf, disabled people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

53 The applicant's design and access statement demonstrates that all residential units meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4 (3) designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users

54 Typical flat layouts and plans of the wheelchair accessible homes have been provided to illustrate the relevant features. It is also clear on plans where the wheelchair accessible homes are located and how many there are. These are distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people, the applicant has excluded studio units from this choice and this is supported.

Energy

55 The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

56 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficient light fittings, whole house ventilation with heat recovery (MVHR) and heating and hot water controls linked to charging system.

57 The demand for cooling will be minimised through minimum lighting and tenant equipment heat gains, balconies acting as shading and reduced g-value (i.e. 0.4).

58 The applicant is required to provide information on the light transmittance of the glazing, due to the low g-value proposed, in order to ensure that any visual discomfort issues will be avoided for the tenants.

59 An Overheating Analysis using thermal dynamic modelling has been undertaken to assess the overheating risk within the conditioned areas of the building; its results demonstrate that all apartments meet the TM 52 requirements and that a number of the apartments will experience overheating with increasing temperatures. The applicant has stated that the development could, however, be adapted to encourage air movement within the apartments and reduce temperatures within the living areas further. The applicant has made a few recommendations associated with interior design changes and structural changes. The applicant should consider incorporating a number of the design measures discussed now in order to reduce the overheating risk as it may affect the design of the building.

60 The development is estimated to achieve a reduction of 28 tonnes per annum (8%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

61 Sample SAP calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

62 The applicant should model additional passive design measures and commit to further carbon reduction through the 'Be Lean' scheme. Options that should further be investigated include lower U-values, where possible.

63 The applicant has carried out an investigation and has stated that there are no existing district heating networks within the vicinity of the proposed development. The applicant has,

however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

64 The applicant should carry out an investigation into whether there are any planned district heating networks within the vicinity of the proposed development. According to the London Heat Map the development is also on the border of a district heating opportunity area. The applicant should therefore contact the local borough energy office to determine the current situation of this opportunity area, evidence of any correspondence should be provided to demonstrate that this has been investigated. Evidence of correspondence should be provided to demonstrate that opportunities for connection have been fully investigated.

65 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network should be provided.

66 The applicant should confirm if the site wide heat network will be supplied from a single energy centre. Information on the floor area and location of the energy centre should be provided.

67 The applicant has investigated the feasibility of CHP. However, due the low heat load of the development, CHP is not proposed and this is accepted in this instance

68 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. The applicant has stated that a roof mounted photovoltaic (PV) array, providing renewable electricity is a potentially viable technology. However, according to the applicant, due to limited footprint of the site space the priority for roof space is for communal terraces, children's play areas and secondly plant space. The applicant should demonstrate that the carbon savings on site have been maximised and, following the GLA guidance, on-site renewable energy generation is included, where feasible. The applicant is therefore strongly encouraged to review the proposed renewable strategy and incorporate PVs where feasible.

69 Sample SAP calculation worksheets (both DER and TER sheets) and BRUKL sheets should be provided to support the savings claimed.

70 Based on the energy assessment submitted at stage I, the energy strategy will result in a reduction of 28 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 8%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

Ambient noise

71 London Plan policy 7.15 on noise recommends that noise sensitive development should be separated from major sources of noise wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation.

72 The applicants' Environmental noise survey and train induced noise and vibration assessment establishes that George Street and East Croydon station rail line generally dominate the noise environment around the application site. The assessment concludes that whilst the site is exposed to relatively high levels of noise, there is general compliance with external and internal noise criteria to minimise adverse impacts on health and quality of life.

73 Rail vibration levels will be mitigated by adoption of a heavy stiff form of construction and an avoidance of lightweight long-span construction and an adoption of RC concrete. Whilst, the rail and road noise impacts have been identified and mitigated against through high performance glazing an adoption of acoustic vents that will provide the required internal noise levels for daytime and night-time. The finalised design solution will need to be supported by an appropriately worded condition.

Flood risk/drainage

Flood risk

74 The site is within Flood Zone 1, and borders significant areas of surface water flood risk to the east within the railway cutting and to the south west on the adjacent Fairfield development site. The Sustainability Statement notes that the FRA states that any surface water will be directed away from the buildings and that the development will have no impact on the flood risk in adjoining areas. The proposals are compatible with London Plan policy 5.12.

Sustainable drainage

75 Although the site itself is not at significant risk of surface water flooding, there are significant areas at risk in the local vicinity and surface water from this site will contribute to those risks. Therefore the application of London Plan Policy 5:13 (Sustainable Drainage) will be an important consideration for this site, and the development should achieve at least a 50% reduction in the current discharge rates.

76 There are no sustainable drainage measures referred to at present, these will be determined at a more detailed planning stage. Therefore a suitable planning condition should be applied to any planning permission:

“No development shall commence until a sustainable drainage regime meeting the requirements of London Plan policy 5:13 has been submitted to and approved by the Local Planning Authority in consultation with the London Borough of Croydon Lead Local Flood Authority

REASON: To ensure the sustainable management of water and minimise the potential for surface water flooding.

Transport

Policy Background

77 The site is located within the Croydon Opportunity Area which was subject to a Planning Framework (OAPF), which was adopted in 2013. The OAPF was supported by a transport study which identified a number of specific and cumulative highway and public transport capacity issues on the network. Since then the council, GLA and TfL has developed a Development Infrastructure Funding Study (DIFS) which was adopted in 2014 which identifies key infrastructure and funding required to support development within the Opportunity Area. Development in the OA is set to intensify significantly in the next few years and it is critical that all projects and developments are fully co-ordinated and the impacts addressed on a cumulative basis.

Dingwall Loop

78 TfL has undertaken public consultation on the Dingwall Loop tram extension, and received overwhelming support for the proposal. The consultation resulted in the decision to progress with the option to develop a new tram loop via Lansdowne Road and Dingwall Road. The improvements

are necessary to provide enhanced resilience to the network and enable TfL to run additional trams which are required as a result of demand created by development in the Opportunity Area, as identified in Table 6.1 and policies 6.1 and 6.2 of the London Plan which seeks to safeguard land for transport. A TWAO application will be submitted in 2016 with construction expected to be complete in 2020. The Dingwall Loop cannot progress without s106 funding from developments, and the tram network cannot meet new demand from developments without enhancements to the network.

Site Access

79 It is envisaged that the two of the three exiting access points on College Road will be removed, with the direct access to the basement car park retained. Pedestrian access points for the residential units will also be from College Road, and ground floor family units will have a direct access to street level. The office and retail units will be accessed from College Road and George Street; all points will be linked to the existing public realm and footways.

Transport Assessment

80 Although some additional information has been provided since the applicant was submitted on the trip generation, TfL still has concerns with the methodology and further justification is requested. Details of the information required to enable TfL to fully assess the impact has been sent to the council.

Car parking

81 The development will be car free with the exception of 23 Blue Badge parking spaces. The reduction in the number of parking spaces at the site is welcomed. Out of these 23 spaces, 22 will be allocated to the residential aspect of the development which meets London Plan policy 6.13 requirements. The final space will be provided for any employees of the site requiring a Blue Badge space. If any additional Blue Badge spaces are required, they will be accommodated within the surrounding location, TfL suggests the applicant identifies potential options if this situation does arise. The applicant's commitment to provide 20% active and a further 20% passive Electric Vehicle Charging Points (EVCP) is welcomed, and should be secured.

82 It is understood that the applicant will hold discussions with car club operators to investigate the options of providing a car club space within the local vicinity of the site. TfL requests the provision of a car club space, along with two years free car club membership for all residents is secured through the section 106 agreement. The legal agreement should also include a clause restricting residents from applying for parking permits within the local CPZ area.

Cycle Facilities

83 A total of 445 long stay cycle parking spaces will be provided with a further 19 short stay spaces. This is in accordance with London Plan policy 6.9 for all land uses and welcomed by TfL. As previously requested at the pre-application stage, TfL requests the cycle route to the long stay storage areas are clearly identified and drivers made aware, to minimise any conflicts between vehicles and cyclists.

84 Whilst TfL welcomes the provision of short stay cycle parking, it is requested the spaces are spread around the site, located close to building entrances and access points rather than to the rear of Block C as previously proposed. The location of these stands should consider the public realm strategy for the wider area and the final location should be agreed with the council and TfL.

85 In line with London Plan policy 6.9, consideration should also be given to the new cycle hub in the surrounding area which recently opened and the development site should enhance this where possible. In general, there is a need to provide higher quality and more comprehensive cycle network in the town centre. The applicant has identified cycle routes from the site to the wider area; this information should be included in the travel plan to encourage sustainable travel.

Pedestrian Environment

86 TfL welcomes the applicant's commitment to enhance the pedestrian environment through the site and improved accessibility. The Pedestrian Facilities Review Note states that existing pedestrian routes are of good quality, and in areas where current provision is poor or in a bad state of repair, such as College Road, the planned improvements will resolve any issues. In line with London Plan policy 6.10 it is essential the applicant works closely with Croydon Council to ensure these improvements are undertaken and necessary contributions secured.

87 The proposed active frontages should complement the public realm in the area and provide as much space as possible for pedestrians. Considering the high footfall in the area and close proximity to the transport interchange, TfL requests the footpath of George Street is as wide as possible.

Public Transport

88 Once the additional information on the trip generation methodology has been received, TfL will review and confirm if the data is sufficient, and will then be able to assess the impact the application will have on the networks, and will be able to confirm if any mitigation is required.

89 It should be noted that Croydon Council, GLA and TfL has worked together on a Development Infrastructure Study (DIFS) which has identified a long list of critical infrastructure and sizable funding gap. This work was followed by an exercise to categorise key infrastructure and develop a list of priority projects. The purpose of this study was to recognise that the cumulative effect of numerous developments coming forward in the town centre if not mitigated, will result in an unacceptable impact on the transport network. All development in the town centre will be expected to contribute S106 funding towards key bus and tram infrastructure, as is required by planning policy.

90 TfL welcomes further discussions with the applicant and council on how specific transport projects will be funded.

Tram Infrastructure

91 The Tram Substation is located adjacent to Mondial House, and therefore it is essential the applicant prepares the construction plans through discussions with TfL to ensure that the development does not impact on the existing Tramlink infrastructure, in accordance with London Plan policy 6.2.

Travel planning

92 TfL welcomes the Framework Travel Plan submitted with the application. Measures to encourage sustainable travel should be included, such as cycle vouchers/free bicycles, marketing and promotional events along with subsidised car club membership as mentioned above. The final residential and commercial travel plans should then be secured, delivered, monitored and funded through the section 106 agreement.

Delivery, Servicing and Construction

93 It is understood that the exiting servicing areas will be maintained, and a similar strategy will be put in place. The site will be served from College Road with vehicles entering and exiting in a forward gear. As already stated at the pre-application stage, TfL would prefer the servicing to be undertaken onsite and if this is not possible, justification and information about the site constraints should be provided. A Delivery and Servicing Plan, in accordance with TfL guidance should be secured by condition in with London Plan policy 6.14.

94 Since the application was submitted, information on construction plans and a draft Construction Logistics Plan (CLP) has been provided, this is welcomed by TfL. TfL expects the final versions to also be in accordance with TfL guidance, prepared with input from TfL and the council and secured by condition in line with London Plan Policy 6.14.

95 The scale of development activity projected in Croydon town centre over the next 5 years is unprecedented. An example of where this level of construction activity is taking place is in the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area, and this has required an advanced and highly detailed area wide construction management framework to be developed. This will require commitment from developers to programme their works and to minimise impacts and share construction and servicing information and infrastructure. Further discussions are required in this regard.

96 TfL wishes to ensure that construction vehicles are fitted with cycle specific safety equipment, including side-bars, blind spot mirrors and detection equipment to reduce the risk of collisions on the Capital's roads. For any conflict points identified on the delivery routes associated with the site in its construction and operational state, traffic and pedestrian management measures and cycle specific safety equipment should be considered and the detail provided through the CLP and DSP.

Summary

97 In summary, additional information should be provided on the trip generation and adequately addressed through the section 106 obligations, with contributions secured towards the DIFS. EVCP should be secured by condition, with a car club space and membership included within the section 106 agreement along with restricting residents from applying for parking permits. The locations for short stay cycle parking and cycle routes through the site should be identified.

98 Finally, the Delivery and Servicing Plan and Construction Logistics Plan including information on the tram infrastructure should be secured by condition with the final Travel Plan secured through the section 106 agreement.

Community Infrastructure Levy

99 The Mayor of London introduced his Community Infrastructure Levy (CIL) on 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.

100 The Croydon Development Infrastructure Funding Study (DIFS) identified a number of critical transport projects and concluded that there is a significant funding gap that must be filled through a range of funding sources. The Croydon CIL was adopted in 2013 but this only currently allows for collection of funding for specific walking and cycling projects and does not include tram or bus infrastructure. TfL notes that CIL should not be used for mitigation.

101 Given TfL has identified a number of key tram projects in Croydon and in accordance with London Plan policy 8.2, TfL requests that section 106 contributions are also secured in order to help close the funding gap identified in the DIFS. Further discussions with the applicant and the council are requested on the appropriate level of contribution.

Local planning authority's position

102 Unknown at the time of report preparation.

Legal considerations

103 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 and any connected 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

104 There are no financial considerations at this stage.

Conclusion

105 London Plan policies on housing, affordable housing, urban design, play space provision, inclusive design & access, energy & sustainability and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The principle of development of a residential led mixed-use development is accepted given the Croydon OAPF and local plan policy guidance for the site and Mid Croydon Fairfield sub area.
- **Housing mix:** The development housing mix allow for 19% three bed units and 54% two bed units, although the housing mix falls short of OAPF guidance the short fall is not significant and provides a good balance and choice of accommodation that is compliant with London Plan policy
- **Affordable housing:** The applicant has completed an affordable housing viability assessment and the initial offer is the provision of 15% or 33 intermediate affordable units (shared ownership) with no social/affordable units included in the development. This offer is contrary to London Plan policy which sets a requirement of 60% social and affordable rent and 40% for intermediate rent or sale and the applicant should explore options for social/affordable rent units.

The applicant's affordable housing viability assessment should be independently reviewed on behalf of Croydon Council and shared with GLA before any revised offer is accepted.

- **Urban design:** The application proposals have been through a number of design iterations which have adjusted both the building height and massing and Croydon Council has had a number of pre-application meetings with the applicant since the GLA pre-application meeting. The design approach is well considered and supported but further detail should be provided on the design of the podium level amenity spaces.
- **Play space provision:** The applicant states that a total of area of 240 sq.m. of doorstep play space will be provided in Block A roof and podium level Block B (floor 13) and Block C (floor 11), whilst this could meet requirements, the applicant should provide more details on the design of the rooftop amenity spaces and how play space features are incorporated.
- **Inclusive design & access:** Typical flat layouts and plans of the wheelchair accessible homes have been provided to illustrate the relevant features. It is also clear on plans where the wheelchair accessible homes are located and how many there are. These are distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people, the applicant has excluded studio units from this choice and this is supported.
- **Energy:** Based on the energy assessment submitted at stage 1, the energy strategy will result in a reduction of 28 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 8%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions and provide the request verification information before stage 2 referral.
- **Flood risk & drainage:** There are no sustainable drainage measures referred to at present, these will be determined at a more detailed planning stage. A suitable planning condition as proposed should be applied to any planning permission.
- **Noise:** Rail vibration levels will be mitigated by adoption of a heavy stiff form of construction and an avoidance of lightweight long-span construction and an RC concrete frame has been adopted. Whilst, the rail and road noise impacts have been identified and mitigated against through high performance glazing an adoption of acoustic vents that will provide the required internal noise levels for daytime and night-time. The finalised design solutions will need to be supported by an appropriately worded condition.
- **Transport:** Additional information should be provided on the trip generation and adequately addressed through the section 106 obligations, with contributions secured towards the DIFs; EVCP should be secured by condition, with a car club space and membership included within the section 106 agreement along with restricting residents from applying for parking permits; the locations for short stay cycle parking and cycle routes through the site should be identified; and the Delivery and Servicing Plan and Construction Logistics Plan including information on the tram infrastructure should be secured by condition with the final Travel Plan secured through the section 106 agreement.

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