

# Royal Mail Delivery Office, 1-5 Addiscombe Road, Croydon

in the London Borough of Croydon

planning application no. 13/03126/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 building and the development of a building arranged in three blocks ranging from 8-21 storeys to provide 201 residential units (1-3beds), up to 1,760sq.m (GIA) of retail floor space (use classes A1-A5) at ground floor level, access, car parking, landscaping and works to the public realm.

## The applicant

The applicant is **Royal Mail Estates Limited** and the architect is **Allies and Morrison Architects**

## Strategic issues

The principle of this proposal is acceptable and welcomed as it brings about the redevelopment of a soon to be vacant office block (the post office site) in the **Croydon Opportunity Area** and will bring forward new and much needed residential development and some convenience retail provision. Outstanding information is required to be provided on **housing viability** to demonstrate the maximum reasonable amount is being secured. The economic viability assessment results are also required to confirm that **employment loss** is justified. **Energy** and **transport** matters raised within the report also require further clarification before a stage two referral can be made.

## 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 73 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.

## Context

1 On 25 September 2013 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 6 November 2013 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 application site is 0.43 hectares and is located between Addiscombe Road, Cherry Orchard Road and Billinton Hill. These are local authority roads, with the nearest part of the Transport for London Road Network (TLRN) being the A232 Fairfield Road 350m away. The site is located within the Croydon Metropolitan Centre, and is adjacent to East Croydon station.

6 East Croydon station is served by numerous national rail services as well as London Tramlink and nine different bus routes. In addition, three bus services operate along Cherry Orchard Road, with a further 14 services running along Wellesley Road 600m to the west of the site. As a result, the site records an excellent public transport accessibility level (PTAL) of 6b, the highest rating possible.

7 The site is bound by No.1 Croydon (also known as the NLA Tower) to the south, which is a twenty four storey locally listed office block, identified by its distinctive faceted elevation. To the east of the site, on the opposite side of Cherry Orchard Road is a large modern commercial building called Stephenson House, which ranges between 9 and 12 storeys. To the north of the site is the Porter and Sorter public house, which is outside the development site boundary.

8 The site is currently occupied by a 7 storey building (including basement) and is used as a delivery office by Royal Mail. This building was constructed between 1962 and 1967 and designed by E.T Sargent for the Ministry of Public Buildings. The building occupies most of the site with exception to the north which is used as a surface car park for employees.

9 The site's topography is highest at the south western junction between Addiscombe Road and Billinton Hill, and lowest on Cherry Orchard Road, where the landscape falls by 4m towards the north, and again at the bottom of Billinton Hill, by 3.6m.

10 The site is located within the Croydon Opportunity Area Planning Framework (OAPF) which indicates that the site falls within the Commercial Core character area and the central height area.

## **Details of the proposal**

11 The scheme comprises a total of 201 residential apartments across all tenures (described in detail within the housing section of this report) in a building arranged in three blocks ranging from 8-21 storeys, and 1,760sq.m of one ground floor retail unit. Three communal gardens are also proposed in the development at the podium level, roof garden at the eight floor and a roof terrace at the nineteenth floor.

### Contributions towards the East Croydon Masterplan initiatives:

12 There are a number of initiatives under way around the site, particularly around the station to create an east-west link between the land either side of the station, joined up public realm, station renewal and clear 'way finding' to make the transport interchange legible. Various land owners have agreed to contribute towards these public realm improvements and the applicant also proposes to contribute towards these.

## **Case history**

13 The applicant has engaged with the GLA pre-application process and an advice report (D&P 3174) was issued on 15 July 2013, following on from a meeting on 17 June 2013.

14 The applicant was advised that the principle of a residential led mixed use scheme on this site is supported. The applicant was asked to provide further information regarding housing mix, further detailed design and residential quality, play space, energy, sustainable development and transport before the scheme was referred to the GLA at stage 1.

15 Adjacent to the site are two recently approved applications at Ruskin Square, to the north west and Morello London, to the north. These proposals establish a new urban context within the area, which meet the expectations of the masterplans for the area, creating landmarks in the form of mixed use towers.

## **Strategic planning issues and relevant policies and guidance**

16 The relevant issues and corresponding policies are as follows:

- Principle of development London Plan;
- Mix of uses London Plan;
- Housing London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy;
- Affordable housing London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy;

- Density London Plan; Housing SPG
- Urban design London Plan;
- Access London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Sustainable development 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
- Transport London Plan; the Mayor's Transport Strategy;
- Parking London Plan; the Mayor's Transport Strategy
- Crossrail London Plan; Mayoral Community Infrastructure Levy

17 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, and the Croydon Council Local Plan 2013, and the 2011 London Plan (with 2013 Alterations).

18 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 (adopted January 2013)

## **Principle of Development**

### Residential

19 The provision of residential accommodation on this site 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.

20 As set out in paragraph 10, 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 over the plan period to 2031.

21 Within the Croydon Opportunity Area Planning Framework Document (OAPF) the site is located within the New Town and East Croydon Character area and within the commercial core where a mix of office, hotel and high density residential development is encouraged; up to 755 new homes are expected in this area by 2017 and up to 2,045 homes by 2032, with regards to commercial space a net uplift of 230,000 sq. m. is expected. The principle to deliver 201 units on this site is therefore acceptable and welcomed.

## Commercial/retail

22 The applicant is also proposing to deliver 1, 760sq.m of retail floorspace at the ground floor, which will accommodate A1-A5 uses. The applicant proposes to provide this space as one single area, with the option to subdivide this into a number of smaller units. It is anticipated that a supermarket will be situated here amongst restaurants/cafes, and small independent shops. The Council will ensure that the applicant is conditioned to provide convenience shopping opportunities here so as to not compromise Croydon's core retail area. This is a requirement set out in the OAPF to secure appropriate provision of convenience floorspace, and to limit the quantum of comparison floorspace delivered on the site.

23 The principle to include retail floorspace is considered to be acceptable based on the outcome of the sequential test analysis undertaken by the applicant.

## Employment loss

24 At the pre-application stage, the applicant had proposed to provide 600 sq.m of floorspace for employment use (creative industry uses). However, this has now been excluded and thus there will be a loss of employment floorspace (Use Class B8). It is understood that the applicant has undertaken an economic viability assessment to justify this loss, and the Council has commissioned this to be independently assessed. The Council's Core Strategy policy SP3.3 indicates that the Croydon Metropolitan Centre is a desired location for employment opportunities, and further, policy SP3.2 of the Core Strategy also suggests that there ought to be like-for like replacement of employment floor space unless it can be demonstrated that there is no demand for the floorspace in the proposed location or that it would make the scheme unviable.

25 Whilst this loss does not raise any concern at a strategic level given that the site is not located within Strategic industrial Land; the Council will need to be satisfied that the loss of this commercial space is acceptable in this location given its local 'Town Centre Industrial Location' classification.

26 Preliminary assessment findings from the Council's independent assessors suggest that the proposal is a viable use for the site, and that alternative industrial/employment uses would not help regenerate and redevelop this soon to be vacant site, in viability terms. This information still needs to be verified at this stage. The Borough is nevertheless retaining the post office facility through its proposed relocation to the Wandle Park Trading Estate.

27 Overall the principle of a residential led mixed use development is supported in strategic planning terms.

## **Housing**

28 The scheme, in total will deliver 201 residential units, which as set out in paragraphs 18 to 20 of this report is acceptable and in line with London plan policy; the proposed total residential mix is as follows:

<b>Tenure</b>	<b>studio</b>	<b>1bed</b>	<b>2b/3p</b>	<b>2b/4p</b>	<b>3bed</b>	<b>Total of units</b>
Private	20	69	14	62	6	171
intermediate		10	0	2	0	12
Affordable		0	0	6	12	18
<b>Total</b>	<b>20</b>	<b>79</b>	<b>14</b>	<b>70</b>	<b>18</b>	<b>201</b>
percentage	10	39	7	35	9	%

#### Maximum reasonable amount of affordable housing/tenure split

29 The applicant is proposing 15% affordable housing (per habitable room) or 30 units. The remaining 85% will be private market housing. A 60:40 tenure split is proposed between affordable rented and intermediate provision, comprising 18 affordable rent apartments and 12 intermediate. The affordable units will be provided within block B, of which 18 of the 28 units will be affordable.

30 The applicant's proposal is policy compliant in tenure mix terms however the viability assessment results will help to ensure that the maximum reasonable amount of affordable housing is being delivered in light of the other viability issues addressed earlier in the report. At this stage the minimum 15% is being delivered and it may be appropriate for the Council to implement a review mechanism to identify whether an uplift of affordable units upto 50% could be achieved, should higher development values be realised at a later stage and given the site's location in the opportunity area.

#### Housing choice

31 London Plan policy 3.11 accords priority to family housing within provision. In addition, policy 3.8 and the associated supplementary planning guidance promote housing choice and seek 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.

32 With regards to housing mix, the Croydon OAPF expects the provision of family housing to be 10% as the site is located within the central area as designated by Figure 4.9 of the OAPF.

33 Further the applicant is providing 35% 2 bed/ 4 person units which is in line with the local policy requirement (policy 2.5, CLP) for the proportion of 2bed family sized units catering for 3-4 people. The proposal provides 9% three bedroom units, which is below the target of 10%, however this difference by one unit is considered to be marginal by the Council, given the high proportion of 2bed/4person units being provided.

As stated above, the scheme will provide for 9% of 3 bed units and that 42% of the scheme will be 2 bed units (7% 2bed/3 person and 35% 2 bed 4 person). Whilst 20 studios and 79 one bed room units are also proposed, the overall proportion of family units is above the number expected in this area. This is welcomed and in line with local policy needs.

## Density

34 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. As stated in paragraph 6, the site has a public transport accessibility level (PTAL) of 6b. The site lies in a central setting, as defined by the London Plan and based on the sites PTAL range, a density range of 650 - 1100 habitable rooms per hectare (hr/ha) should be applied to the scheme as indicated by Table 3.2.

35 Based on the applicant's accommodation schedule, the density is approximately 1,167 habitable rooms per hectare, which is broadly in accordance with the guidance range within the London Plan. Given the high public transport accessibility of the site, and its location within the Croydon OAPF area, it is acknowledged that it is an appropriate location for a high density development. As detailed in the relevant sections of this report the design of the proposal delivers good residential quality, a range of units, childrens playspace and appropriately responds to the emerging context. The proposed density is therefore acceptable in strategic planning terms.

## Residential quality

36 The residential quality is generally good; a very high proportion of the apartments are dual aspect, there are no north facing single aspect homes, and all units meet the London Plan Space Standards. However, as set out at the pre-application meeting, there is concern that the apartments to the north of the site are all served by a single core, resulting on a very high number of units sharing the same landing, against advice set out in the Housing SPG. The applicant is advised to turn the north-western fire core into a primary vertical circulation core and split the proposed corridors so that no more than eight units share the same landing.

37 The applicant has carefully laid the development out so the number of single aspect units facing the railway line has been minimised to only one unit per floor. Officers are satisfied that given the low number of units and that the building is a significant distance from the railway line itself this does not present a concern.

## **Urban design**

38 The proposed 20 storey building is supported in the context of the emerging townscape within the town centre. Whilst its appearance is simple and elegant, and the predominant use of brick is strongly supported, for a building of this height and prominence to be acceptable, its overall design will need to be of an outstanding quality. However a number of aspects discussed at pre-application stage have not been addressed and need further work. These are set out below:

39 There was concern that the service yard located to the north of the development is not an effective use of land and will impact negatively on the public realm and this remains unresolved. The applicant has stated that the site cannot be redeveloped at this stage due to existing rights to light constraints posed by the adjacent Porter and Sorter Public House (confirmed by the Transient Overshadowing Assessment). The applicant has sought to overcome this issue in the short to medium term through good design, namely:

- by locating the concierge office in the north eastern corner to provide overlooking and to manage this space;

- boundary treatment consisting of a green wall constructed in facing brickwork mounted by a series of vertical metal rods and behind this, a raised planting bed with shrubs and climbers and a series of trees - this treatment has been subject to further post-submission discussions with Croydon Council to ensure that a richer and more dense foliage climbing plant species is used to the full height of the proposed wall;
- high quality surface treatment (asphalt with a grey chipping mix within it); and
- covered bin storage.

Whilst this is an acceptable mitigation in the short term, there remains concern regarding the lack of activity and overlooking on Cherry Orchard Street and Billinton Hill.

40 Officers have been informed that the public house adjacent to the site will soon be demolished, allowing for a comprehensive redevelopment including and a 17 storey office block which will be built over the service yard. Further information relating to this future development is required, in particular illustrations showing how this will appropriately generate pedestrian activity and overlooking of Cherry Orchard Street and Billinton Hill.

41 Further work was required at the pre-application stage to demonstrate how the proposed large retail unit is likely to be used by future occupiers, as concern was raised that important aspects of the frontage would become inactive if used for back of house uses. The applicant's design and access statement has reviewed a possible option to subdivide the retail floor into a number of units that front on onto the whole of Addiscombe Road, Billinton Hill and Cherry Orchard Road. These smaller individual self-contained units, each with their own individual entrance, would provide active frontage and contribute to an improved public realm which is welcomed. However, whilst officers understand the need for flexibility, and individual unit facing Cherry Orchard Road is critical and needs to be fully incorporated into the application.

42 The station forecourt edge of the building is mostly inhabited by parking and servicing uses that create a poor quality edge to this space which is concerning given the importance of this space as an arrival point into Croydon. Whilst the location of the residential core on this edge is welcomed, as it will help activate this edge of the development, further consideration of how the scheme can provide activity and overlooking on to the station forecourt is required. The applicant is advised to treat the north eastern core as a primary entrance to apartments above, and includes a small foyer at street level. This helps improve the quality of the public realm, in particular in the evenings, as well as dealing with residential quality issues raised previously.

### **Children's play space**

43 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." Using the methodology within the Mayor's supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation, September 2012' it is anticipated that there will be approximately 41 children within the development, of which 18 will be within the 0-5 age range. 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. As such the development should make provision for 409 sq.m. of playspace of which at least 204 sq.m should be on-site provision for under 5s.



44 This development proposes three community gardens- at the podium level, which will be accessible to all three residential blocks/cores via lift or stairs, at the eight floor from the northern core, and on the nineteenth floor, with access from the tower core. Soft landscaping, private amenity spaces, in the form of balconies or terraces (of 5sq.m and with a minimum depth of 1.5m), and play space provision for under fives is also to be provided on site. Informal and formal children's accessible playspaces are provided in the courtyard and roof garden. The courtyard play space is overlooked by the residential units, to create natural surveillance, which is welcomed. The playspace provision exceeds the Mayor's requirement and is therefore in compliance with the SPG.

### **Inclusive access**

45 The aim of Policy 7.2 is that proposals aim for the highest standards of accessibility and inclusion (not just the minimum) and that the design process has, from the outset considered how everyone, including disabled and Deaf people, older people, children and young people, will be able to use the places and spaces that are proposed.

### Residential

46 Policy 3.8 requires that all new housing is built to Lifetime Homes standards. The applicant has stated that the units will be 100% compliant with Lifetime Homes standard and that 10% (20 units) provision of wheelchair accessible housing is provided in the scheme.

47 The applicant has indicated that this provision will be as follows:

- 1bed/1 person units in core A - 8 units on mezzanine to level 4;
- 2 bed/4person duplexes in core A - 2 units on levels 1 to 4;
- 3bed/ person in core B-three units on levels 1,3, and 5; and
- 1bed/1 person units in core C-7 units on levels 1-7

48 The provision of these units is distributed throughout the development and represents various sizes and types of unit in the development which is welcomed.

49 The proposal has been revised to have two lifts within each block/dwelling and since there are many level changes across the site, the applicant will ensure that access between carparking areas is level (avoiding the need for ramps), both measures ensuring compliance with the Wheelchair Housing Design Guide and Lifetime Homes standards respectively. The Council should ensure that the applicant is conditioned to ensure delivery of the inclusive access proposals set out for the scheme in its internal arrangement, the commercial element and the public realm.

### **Sustainable development**

#### Flood Risk/surface water run-off management

50 The site is within Flood Zone 1 and as such the principle of the development is acceptable. The application includes a drainage management plan, which is welcomed because whilst the site itself is not at a particularly high risk of flooding, other areas within and near to Croydon town centre are at high risk of surface water flooding. The plan proposes to capture and attenuate rainwater to reduce the discharge from the site by 50%. This will be achieved using two tanks situated below a pedestrian area and a storage area within the development. This approach is considered an acceptable application of London Plan Policy 5.13 and the Mayor's Sustainable Design and Construction SPG. These measures should be secured using an appropriate planning condition.

## **Climate Change/Mitigation**

51 A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide 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 low energy lighting and controls and natural ventilation for the residential. The demand for cooling will be minimised through openable windows.

52 The applicant should provide further details on the efficiency measures implemented for both domestic and non-domestic and on how the cooling hierarchy (policy 5.9) has been followed to reduce cooling demands. SBEM and SAP outputs for the efficiency only case (i.e. excluding CHP) should also be provided to evidence the carbon savings achieved by efficiency alone, as the 23.4% quoted appears high based on the fabric information provided.

53 The applicant has estimated a 23.4% reduction in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development, further information needs to be provided to verify this figure.

### District heating

54 The applicant has carried out an investigation and there are no existing or planned 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.

55 The applicant is proposing to install a site heat network. The applicant has confirmed that a single network will serve all apartments and non-domestic building uses for domestic hot water, however the applicant should confirm that the space heating will be served by the same network, or at least the same plant room. A drawing showing the route of the heat network linking all buildings on the site should be provided.

56 The site heat network will be supplied from a single energy centre, however the report suggests that more than one boiler room will be provided for the domestic space heating. Taking into account the proposed phasing of the development, the applicant should aim to serve the site by a single energy centre and a single heat network. Further information on the floor area of the energy centre should also be provided.

### Combined Heat and Power

57 The applicant is proposing to install gas fired CHP unit to meet the domestic hot water demands from the domestic and non-domestic buildings on site and to meet the space heating with communal gas boilers.

58 The applicant should provide further information including monthly energy load profiles (including electricity) for the development to demonstrate how the CHP engine has been sized and the savings quantified. The proposed installed capacity for the CHP should also be provided. Given the likely small size of the system, further information should be provided on the electricity sale strategy and likely management arrangements for the system.

59 The applicant should provide carbon emissions and carbon savings associated with this step of the energy hierarchy following the methodology given in the GLA Guidance document.

## Renewable energy technologies

60 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. This is acceptable as long as, after addressing the comments above, it can be demonstrated that the 25% carbon reduction target is achieved by the first two steps of the energy hierarchy.

61 After addressing the comments above the applicant should provide tables of carbon emissions and savings at each step of the energy hierarchy as described in the GLA guidance document. These are required to verify the savings and confirm whether the scheme complies with Policy 5.2 of the London Plan.

## **Transport for London**

62 The low level of car parking provision (28 spaces) is welcomed, and cycle parking, blue badge parking and electric vehicle charging points are to be provided in accordance with London Plan standards. Suitable conditions or planning obligations should secure a car park management plan and prevent residents from applying for on street parking permits given the high PTAL of the site.

63 Given its scale and the frequency of public transport available compared to expected demand from the development there should be a negligible impact on the transport network. However, the Council should consider the cumulative impact of this and other development anticipated in the Croydon OA on both the highway and public transport networks.

64 It is proposed that Croydon's CIL will be used to improve the pedestrian environment around the site, which is welcomed. However, some changes to the design of the area outside the proposed food store are requested to minimise the chances of pedestrians and cyclists crossing or using the tram tracks to access it, which would pose a safety risk.

65 A travel plan has been provided and should be secured through the section 106 agreement. TfL would also encourage the applicant to work with the Council to identify a suitable on street location for a car club space and to offer free membership as a measure to support the travel plan's objective to encourage a car free lifestyle.

66 A delivery and servicing plan and construction logistics plan should be secured by condition, along with a further condition restricting the maximum size of service vehicle to avoid servicing on street due to the constraints of the basement loading bay. Further discussion on construction arrangements will also need to take place post consent to minimise impacts on trams, buses and taxis.

67 In accordance with policy 8.3 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100sq.m. or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £20 per square metre of additional floor space in Croydon.

68 Croydon Council adopted its borough CIL on 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. The Council should confirm the amount and purpose of contributions to be collected via CIL or section 106 and this should be consistent with delivering the objectives of the OAPF, having regard to cumulative impacts.

69 In summary, this development's restrained approach to car parking is welcomed by TfL in line with London Plan Policy 6.13 and it is accepted that the proposals will not have a significant transport impact in their own right. However, some changes to the layout of the public realm on Addiscombe Road are recommended to ensure pedestrian and cyclist safety.

## Local planning authority's position

70 It is understood that the Council is awaiting the results of their independent assessments of the applicant's economic and housing viability assessments. Whilst the Council would favour an employment related development to comply with policy SP3 of the Croydon Local Plan 1 (Core Strategy), it is also adopting a flexible approach to meet the requirements of the OAPF, which suggests that residential uses can also be acceptable subject to considerations. The Council have been had some indication from their independent assessors that employment provision would deem the scheme to be unviable.

## Legal considerations

71 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 (the next bit is optional) 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

72 There are no financial considerations at this stage.

## Conclusion

73 London Plan policies on principle of development-loss of employment, housing, housing density, children's playspace, urban design, inclusive design, climate change mitigation and transport are relevant to this application. The application complies with some of these policies but not yet with others and on balance 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 principle to demolish a soon to be vacant office building and redevelop the site for a residential led development is supported in London Plan policy terms for this location. This is also compliant with local policies specified in the Croydon OAPF although the Council should be satisfied that the loss of office is not detrimental to local needs as specified in it's Local Plan.
- **Housing:** The applicant's viability assessment should be made available before the application is referred back at stage two. The Council should ensure that the maximum reasonable amount of affordable housing is achieved through implementing a review mechanism. The viability justifications should confirm whether the optimum number of units are being secured at the site.

- **Urban design:** The overall design approach is supported. The design amendments have addressed the concerns raised at the pre-application stage and the Council should ensure that the various access arrangements and temporary screening proposed at the rear of the site are conditioned.
- **Children’s playspace:** The scheme is compliant with the Mayor’s policy on individual
- **Inclusive access:** The proposal meets lifetime homes standards and allows for accessibility through the site given the level changes. All parking is also for blue badge holders. These measures are welcomed. The various proposals outlined by the applicant in the design and access statement to make the scheme accessible to all, should be conditioned by the Council.
- **Sustainable development:** The Council should secure the proposals to mitigate surface water runoff in appropriately worded conditions, in light of the site’s varying gradients and potential impacts elsewhere.
- **Climate change mitigation:** The applicant has broadly followed the energy hierarchy to reduce carbon dioxide emissions. However further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified as detailed in the energy section of this report. The applicant should provide tables showing the site wide carbon emissions (in kgCO<sub>2</sub>/year) and carbon savings achieved at each step of the energy hierarchy as detailed in the GLA guidance on completing energy assessments (<http://www.london.gov.uk/sites/default/files/Energy%20Planning%20Guidance%20update%20%2C%20Aug%202013.pdf>).
- **Transport:** The transport section of this report details some further work which is required, namely a travel plan and car club facilitation, a delivery and servicing plan and construction logistics plan, which should be secured by condition. Restrictions are required to avoid large servicing vehicles on the street and CIL contributions need to be quantified. The relevant public realm improvements need to be specified by the Council and secured to make this proposal acceptable in transport terms and to ensure the safety of pedestrians and cyclists at Addiscombe Road.

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