

Fair Field Masterplan & Phase 1a Development, Croydon

in the London Borough of Croydon

Planning application no.16/00944/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

A hybrid application consisting of the following:

1. Outline planning permission for demolition and redevelopment to provide class C3 (residential dwellings) and flexible class A1 (shops) and or class A2 (financial and professional services) and/or class A3 (food and drink); class B1 (business) class C1 (hotel) class D1 (non-residential institution) and D2 (assembly and leisure) public realm and landscaping; and associated car and cycle parking, servicing and access arrangements (with all matters reserved); and
2. Full planning permission for the demolition including multi storey car park and Barclay Road Annexe; extensions and alterations to Fairfield Halls including class A3 (food and drink) erection of buildings to provide Class C3 (residential dwellings) and for flexible class A1 (shops) and or class A2 (financial and professional services) and or class A3 (food and drink) and or D1 (non-residential institution) and or class D2 (assembly and leisure) ; change of use of basement car park to class D1 (non-residential institution) public realm and landscaping and associated car and cycle parking, service and access arrangements.

The applicant

The applicant is **Croydon Council**, the architect is **Rick Mather Architects** (full application) and the agent is **Turley**.

Strategic issues

The principle of mixed use development proposed by the masterplan and the detailed application for phase 1a is accepted.

The Masterplan has issues to be resolved in relation to **housing mix, affordable housing, density, urban design, play space provision, inclusive design & access, energy & sustainability, ambient noise, flood risk and transport**.

The phase 1a has issues in relation to **affordable housing, density, urban design, access, children & young persons play, energy 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 221 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 28 April 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A, 1B, 1C, and 3F of the Schedule to the Order 2008:

- *'1A: Development which comprises or includes the provision of more than 150 houses, flats, or flats and houses.*
- *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.*
- *1C(c). Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London".*
- *3F: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.'*

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 masterplan site comprises land bound by George Street, Park Lane, Barclay Road and the London to Brighton line railway line to the east. land to the south-west of East Croydon Station. The Phase 1a details development proposal for the southern portion of this site area.

6 Park Lane 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 A232, Barclay Road and Park Lane Gyratory to the southeast of the site, forms part of the Transport for London Road Network (TLRN). There are a number of bus stands on Park Lane in front of the development and there are a number of coach parking spaces at the front of the site.

7 Several bus routes can be accessed from the site and from East Croydon bus station, with the nearest bus stop located on Park Lane adjacent to the development. East Croydon Railway

Station is located approximately 100 metres to the northeast, providing access to the Tram network and trains to London Victoria and many other destinations. 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.

The masterplan

8 The outline masterplan comprises development sites in six defined clusters these are defined as George Street frontage; Croydon College and surrounds; College Green, multi-storey car park and surrounds; Croydon's Magistrate Court and Family Court; Barclay Road annexe (Croydon College); Fairfield Halls; and Car Park areas.

George Street frontage

9 The George Street frontage cluster consists of five existing buildings these are: Suffolk House a low rise (four-storey) 1960s building with offices and a gym occupying the upper floors and retail units at ground floor; 96 George Street (11 storeys) comprising office space and St Matthew's House (three storeys) which at ground floor accommodates the Diocese of Southwark's Croydon Area Mission Team (including a chapel and a meeting room) and six residential properties on long leases. Both buildings have a combined floorspace of approximately 4,508sq.m. (GIA); and 101 George Street site, previously occupied by an office building also known as Essex House, but now cleared and the subject of a planning permission (D&P/1585c). Further to the east and separated by a pedestrian route connecting George Street with College Road is Mondial House which is a 15- storey office building containing 8,204 sq.m. GIA of floorspace which is subject to a current application (D&P/3480).

Croydon College and surrounds

10 To the south of George Street is College Road providing access from/to Park Lane. Facing onto College Road is the Croydon College Fairfield Campus building completed in the early 1960s. This has a 'moat' around most of its perimeter revealing the basement level of the building and surrounding car parking areas. The car parking extends beneath part of College Road which is constructed on a podium structure which wraps around the western end of Croydon College and to the south of it. The building comprises approximately 40,593sq.m. (GIA) of floorspace.

11 To the east of College Campus building is an open air basement level car park formerly owned by Croydon College but now in the ownership of Phoenix Logistics. This land ('Land adjacent to Croydon College') is subject to planning permission (D&P/3322) granted in December 2015 for the *'Erection of part 16/38 storey building (plus basement and mezzanine levels) comprising 159 residential units, 225 bedroom hotel and restaurant (within use class A3); provision of associated amenity areas, landscaping and car/cycle parking and alterations/partial enclosure of access ramp'*.

12 At the other end of the College building, fronting onto Park Lane, planning permission was granted on 13 August 2015 for *'Erection of single storey extension to the western end of Croydon College's Fairfield Building to provide new hair and beauty reception and salon and new cafe/bistro, as well as new entrance and external landscaping'*.

College Green, multi-storey car park and surrounds

13 To the south of Croydon College Fairfield Campus building is College Green (also known as Fairfield Gardens) which together with adjacent public realm, occupies the ground level of the podium structure which separates Croydon College from Fairfield Halls further to the south. College Green comprises a series of lawns with raised brick planters containing soft landscaping laid out in a formal and orthogonal style.

14 At the eastern end of College Green is a 1960s-built multi-storey car park operated by NCP but owned by Croydon Council. At basement level the car park extends beneath the podium structure extending slightly beneath Park Lane to the west. There are two vehicular accesses to the car park, one via an access road off Barclay Road into the basement level car parking area and the other from Hazledean Road via Hazledean railway bridge and a bridge link providing direct access to the upper levels of the multi-storey car park.

15 The College Green podium structure wraps around the multi-storey car park to the west and north, separated by a gap of approximately 3 metres with three bridges linking the structures. An existing timber staircase provides pedestrian access between the College Green podium structure to the north of the multi-storey car park and the lower ground level. West of this area is a UK Power Networks ('UKPN') substation for which access for UKPN must be retained.

16 To the north of the multi-storey car park is the Arnhem Gate, which fills the gap between the multi-storey car park and Croydon College Fairfield Campus building. The Arnhem Gate forms a series of vertical concrete panels as is so called in reference to Croydon's twin link to Arnhem.

17 A separate stand-alone planning application was submitted in January 2016 for the demolition of the NCP multi-storey car-park, including part of the bridge link connecting the multi-storey car park with Hazledean railway bridge, and associated access staircase. The anticipated programme for the demolition of the NCP car park is five months and the application proposals would therefore be completed at the end of 2016/early 2017.

Croydon's Magistrate Court and Family Court

18 To the south of the multi-storey car park, separated by a retaining wall, is the Croydon Magistrates' Court and Family Court ('the Courts') building which occupies the southeastern corner of the application site, fronting on to Barclay Road. It was built in the late 1960s and is on 'Crown land' (in the meaning of Section 229 of the Town and Country Planning Act 1990 (as amended)), being in the ownership of the Ministry of Justice. It has a floorspace of approximately 8,943sq.m. (GIA).

Barclay Road annexe (Croydon College)

19 The Barclay Road Annexe was built in the 1970s and provides education and associated office space for Croydon Art College (approximately 7,788sq.m. GIA). The building abuts part of the southern edge of College Green between the multi-storey car park and Fairfield Halls. A wing of the building extends southwards between the Courts site and the vehicular ramp leaving from Barclay Road to the basement level car park. The Annexe has been under-utilised since 2013 when the Arts department relocated to the Fairfield Campus building.

20 To the east of the main portion of the Annexe building, between it and the multi-storey car park, the basement level is open to the air providing what appears as a sunken plot of land, occupied by temporary storage cabins.

Fairfield Halls

21 At the south-western corner of the application site is Fairfield Halls which is owned by the applicant and currently leased and operated by Fairfield (Croydon) Limited, a registered charity. Fairfield Halls is a regional venue for professional music, plays, musicals, stand-up comedy and classical music and community events.

22 The building comprises approximately 16,378 sq.m. (GIA) of community floorspace and consists of three main elements in a symmetrical arrangement. In the central and largest element,

is the Concert Hall, beneath the auditorium of which is a shared foyer to the building. In the subsidiary wing to the north is the Ashcroft Theatre and the subsidiary wing to the south the Arnhem Gallery which is a multi-functional space used for a range of types of events including conferences. The frontage to Fairfield Halls is laid out as a car park but no longer in use. Vehicular access for coach and other drop-offs is provided via an internal access road accessed from Barclay Road at one end and onto Park Lane at the other.

Car Park areas

23 The application site has five existing car parking areas for public use including: multi-storey car park (see above), basement car park and College Road which also provides non-public car parking. Other private car parking is provided in the Croydon College car park (98 no. spaces) and on the Mondial House site (circa. 47 no. spaces).

Details of the proposal

24 The application proposals are for a hybrid application consisting of the following:

1. Outline planning permission for demolition and redevelopment to provide class C3 (residential dwellings) and flexible class A1 (shops) and or class A2 (financial and professional services) and/or class A3 (food and drink); class B1 (business) class C1 (hotel) class D1 (non-residential institution) and D2 (assembly and leisure) public realm and landscaping; and associated car and cycle parking, servicing and access arrangements (with all matters reserved); and
2. Phase 1a full planning permission for the demolition including multi storey car park and Barclay Road Annexe; extensions and alterations to Fairfield Halls including class A3 (food and drink) erection of buildings to provide Class C3 (residential dwellings) and for flexible class A1 (shops) and or class A2 (financial and professional services) and or class A3 (food and drink) and or D1 (non-residential institution) and or class D2 (assembly and leisure); change of use of basement car park to class D1 (non-residential institution) public realm and landscaping and associated car and cycle parking, service and access arrangements.

Outline masterplan

25 The masterplan built elements are designed as linked individual sites defined as Blocks 1-6 that are delivered over three phases. The delivery strategy also identifies phase overlap areas (A-G) where the parcels of land that are subject to both the full and outline elements of the proposed development meet, this is provided because of different phases of development proposed at different levels and/or 'meanwhile' development of Phase 1A being removed through a later phase. An illustrative landscape and public realm scheme has been produced in the outline part of the application site and it is intended that these works come forward as part of the development of Blocks 1-6 however flexibility is maintained for landscape details to be submitted as a separate reserved matters applications.

Relationship to existing proposals

26 The masterplan proposed development represents an alternative form of development to the consented schemes for 101 George Street/ Former Essex House (D&P/1585c) and Land east of Croydon College (D&P/3322) and the application for Mondial House (D&P/3480). The masterplan parameter plans and guidance however does allow for the same quantum of uses and building height.



Block 1

27 Block 1 is located in the northwest corner of the site in a prominent position at the junction of George Street and Park Lane currently occupied by Suffolk House. It will be bounded on the other sides by College Road to the south and the proposed St Matthew's Walk to the east.

28 The building height parameters are proposed to range between approximately 18-27 metres at the lowest to approximately 33- 41 metres at the highest from existing adjacent ground level. Retail (classes A1 and/or A2 and/or A3) and/or and commercial (class B1) uses are proposed at ground floor providing an active frontage along George Street and Park Lane. The parameter plans establish guidance that 76-95% of these frontages in Block 1 are to be active frontage with the St Matthew's Walk frontage being 41-75% active and College Road at 20-40% (see Parameter Plan 6). Commercial uses will be provided on the upper floors, whilst basement floorspace may also be provided for disabled, cycle and service parking with vehicle access provided via the Barclay Road ramp (ground level disabled parking to College Road and cycle parking is also proposed). At roof level green roofs are proposed as well as space for plant.

Block 2

29 Block 2 is presently occupied by the existing 96 George Street and St Matthew's House buildings as well as the 101 George Street site and surrounding land. It is bounded by George Street and College Road and the proposed Station Link North and St. Matthew's Walk.

30 The building height parameters are proposed to be approximately 17-25 metres at the lowest to approximately 33-41 metres at the highest from existing adjacent ground level with a taller element on the south-eastern corner extending to an approximate height of between 63 and 65 metres. Retail (classes A1 and/or A2 and/or A3) and/or commercial (class B1) and/or class D1 and/or class D2 and/or residential uses are proposed at ground floor with commercial and/or residential at upper floors. The George Street frontage as with Block 1 has an active frontage (76-95%) with St Matthew's Walk and Station Link frontages being 41-76% active and the College Road frontage 20-40%.

31 Basement floorspace may also be provided for disabled, cycle and service parking with vehicle access provided via the Barclay Road ramp (ground level disabled parking to College Road and cycle parking is also proposed). At roof level green roofs are proposed as well as space for plant and sufficient amenity space to support residential uses.

Block 3

32 Block 3 proposals are for the north east corner of the application site on the site of the existing Mondial House site and part of the existing public realm. It is to be a landmark building marking the entrance to the application site from East Croydon Station, referred to as Station Link. Block 3 incorporates three towers extending from a lower 'plinth'.

33 The plinth portion will be approximately 23-31 metres high from existing adjacent ground level with the tallest tower at the George Street end of the block which will extend to approximately 98-108 metres with the other two towers stepping down in height in a southerly direction, to approximately 77- 86 metres and approximately 62 -64 metres respectively.

34 Flexibility is sought for the use/s of the ground floor units with A1/and/or A2 and/or A3 and/or B1 and/or residential and/or hotel. Active frontages within Block 3 are to be maximised on the George Street frontage (76-95%) with activity reducing along Station Link from 41-75% at the northern end to 20-40% towards the south in recognition of the transitional character of this route, going from high activity to the residential character within the Phase 1A residential development to the south. Upper floors of all buildings are to be residential and/or hotel use. Although some basement level space exists already, the masterplan seeks flexibility for additional basement space to be provided in order to accommodate disabled parking and servicing for the potential residential and other uses within the block.

Block 4 and 5

35 Blocks 4 and 5 are the replacement buildings on the existing Croydon College Fairfield Campus site (which is locally listed). The height parameter range for these blocks is between approximately 18-24 metres at the lowest to 27-40 metres at the highest, from existing adjacent ground level. Minimum and maximum height parameters and the Design Guidelines are intended to ensure an appropriate level of articulation and each Block will provide an internal courtyard space to serve the proposed residential use at first floor and above.

36 At ground floor flexibility is sought for residential and/or retail and/or D1 and/or D2 uses with the highest proportion of active frontage (76-95%) on Block 4 fronting onto Park Lane and College Green to the south. St Matthew's Walk which will pass between the two blocks connecting George Street with College Green will have a lower level of active frontage of 20-40% activity creating a transition from the commercial nature of George Street anchored by a higher level of activity in College Green to draw people into the application site. Permeability between Blocks 4 and 5 will be supplemented by pedestrian routes through the courtyards of each block.

Block 6

37 Block 6 is proposed in the south east corner of the application site currently occupied by the existing Court buildings and is a longer term aspiration reflected in this constituting a likely Phase 3 of the Proposed Development.

38 Development of this block will complete the wider pedestrian connections between central Croydon and Park Hill with a continuation of the proposed Station Link, which leads from George Street to Barclay Road through the Phase 1A residential development.

39 Block 6 is proposed to continue the stepping down in scale and height from the George Street frontage blocks to ensure an appropriate relationship with Fairfield Halls and the low-rise residential properties on the southern side of Barclay Road. Block 6 comprises two elements which together a height parameter range between approximately 8-23 metres at the lowest to approximately 14-25 metres at the highest, from existing adjacent ground level with the tallest element being located adjacent to the railway.

40 This block is effectively an extension of the Phase 1A residential development to the north with one element providing a continuation of the residential street and the other element providing a residential courtyard. Non-residential uses (D1 and/or retail) are proposed for the ground floor Barclay Road frontage with a proposed 41-75% active frontage. In the westernmost element of Block 6 (which fronts onto the proposed Fairfield Walk) flexibility is sought for D1 and/or residential use at ground level and above.

41 The proposed development includes potential basement space through possible excavation in the eastern part of the block to provide blue badge/cycle parking and servicing in connection with the uses above. At roof level flexibility is sought to allow for the provision of green roofs, private amenity space, photovoltaics and/or plant.

Block 7

42 Block 7 comprises two building elements one on the eastern end of the existing College Green ('the east building') and one adjacent and to the east of Fairfield Halls ('the west building'), separated by Fairfield Walk and proposed southern extension to College Green. A bridge link could be incorporated to connect the two elements.

43 The east building will form an edge to the Phase 1A residential development. The building height parameter is for a development of between approximately 24-26 metres in height. The west building will be developed above elements of the proposed external alterations to the Fairfield Halls and will have a height range between approximately 5-23 metres at the lowest to approximately 16-29 metres at the highest, from existing ground level. The Parameter Plans and Design Guidelines have been developed so that this building will have an appropriate relationship to Fairfield Halls ensuring a degree of separation at upper levels through reduced heights and articulation of the building mass.

44 Block 7 is proposed as use class D1 only, reflecting the intention that it will provide replacement accommodation for Croydon College. The active frontages are proposed on the elements fronting onto College Green and also provide a backdrop at the southern end of St Matthew's Walk which would give the College prominence from George Street. Basement level space is proposed which may include accommodation for workshops.

Phase 1a (full application)

45 Full planning permission is sought for Phase 1A (which adjoins Block 6 and 7) of the masterplan and comprises four distinct but interrelated elements of new development consisting of residential development (194 dwellings), external alterations to Fairfield Halls, landscaping and public realm improvements to College Green and adjacent areas and a new gallery and basement car park. Phase 1a is not included in the aforementioned blocks in the outline masterplan application because it is planned for immediate delivery.

46 The Phase 1A residential development will require demolition of the multi-storey car park (and associated bridge link to the Hazledean railway bridge), the Annexe and parts of the podium structure and excavation at basement level. Four buildings are proposed Buildings A and B are adjacent to the eastern boundary of the site with the railway and Buildings C and D are to the west in a U-configuration forming three sides of a residential courtyard.

Building A

47 Building A in the north east corner of the Phase 1A residential development is a 21-storey tower with a slenderness ratio of between 1:3 and 1:4. It has recessed balconies located at the corners of each elevation with the top of the building featuring a large recessed window frame on each elevation spanning the top three storeys.

48 Access to Building A is from the street at ground level and the car park at basement level and with a central core providing access to each floor (serving a maximum of four dwellings per floor). Both stairs and a lift is incorporated into the northern elevation of the building at basement to first floor levels to facilitate level access from Hazledean bridge to street/ground level and the basement car park. The lift will also allow access for residents into the building foyer.

49 Building B abuts Building A extending to the south along the eastern boundary of the application site it has a maximum height of eight storeys with the top two storeys stepped back. Private amenity space is provided with front gardens for the ground floor units and balconies for upper floors. The balconies are protruding on all floors above ground level except for the maisonettes at the top which utilise the set back to create balcony space.

50 Each ground floor dwelling has its own street level entrance. Upper floors dwellings are accessed from shared deck terraces at the railway side of the building via a central core, with entrances in the car park at basement level and from the street at ground level. The southern elevation of Building B contains no windows or openings so that part of Block 6 may be built adjacent (or abutting) in Phase 3.

Building C

51 Building C is part six and part eight-storey with the tallest element addressing Building A. The six-storey element extends westwards towards College Green, stepping down at each level on the southern elevation towards the residential courtyard. Each ground floor dwelling has its own entrance from the courtyard. Upper floors are accessed via a core accessed via entrances in the car park at basement level and from the street at ground level.

52 Private amenity space is provided for the ground floor dwellings with front gardens on the courtyard side. Upper floor balconies are formed within the stepping down of levels or protruding structures on the courtyard side and/or recessed into the northern façade, and are uniformly spaced along most the building length.

53 The northern part of the ground floor provides five non-residential units. These are proposed as class A1 and/or A2 and/or A3 and/or D1 and/or D2 uses and servicing will take place from the basement level with a second core providing access to the non-residential units via an internal corridor. The westernmost elevation of Building C contains no windows or openings to allow part of Block 7 to be built adjacent (or abutting)

Building D

54 Building D comprises two parts, the first is aligned with the taller part of Building C but stepped down to predominately six storeys with an additional roof top element extending to an extra storey. The second part to the south is four-storeys and forms the southern edge of the residential courtyard and the building elements adjoin with a slightly greater than 90 degree angle with an opening at ground floor allowing pedestrian and cycle access between the buildings.

55 Each ground floor dwelling has its own entrance from the street or in the case of the southern part, from the courtyard. Upper floors are accessed via two cores with entrances in the car park at basement level and from the street at ground level. A row of maisonettes top (second and third) floors of the southern part of Building D are accessed via a shared deck terrace on the courtyard side. Private amenity space is provided for the ground floor dwellings with rear gardens either courtyard side for those accessed from the street or to the south for those accessed from the courtyard and upper floor balconies protrude from front and rear elevations.

External alterations to Fairfield Halls

56 The proposed external alterations to Fairfield Halls are part of a wider package of internal works to ensure the venue is fit for purpose, efficient to operate and to strengthen its offer in the context of its regional status as a cultural and entertainment destination. Key design features of the proposals are:

- Remodelling the service areas and 'get-ins' at the eastern end of the building at basement, ground and first floor levels.
- Removal of the 1990s extension to the east elevation of the Arnhem Gallery and the introduction of a new multi-function extension to the upper level.
- Extension of the Ashcroft flytower to provide improved operational facilities.
- A glazed extension to the northern elevation to introduce an active frontage onto College Green including class A3 (restaurants and cafes) uses and space in connection with the proposed gallery beneath College Green.
- Works to the roof terraces and façades including repair and refurbishment where necessary and improved lighting.
- Existing flue extended within louvered enclosure in association with a new energy centre within the basement which will serve the Fairfield Halls building, the Phase 1A residential development and other elements of the masterplan as well as the potential to export hot water and electricity offsite.

Landscaping and public realm improvements

57 Full planning permission is sought for landscaping and public realm works within the Phase 1A area of the application site. The landscaping and public realm works are largely a comprehensive site-wide scheme but part are in the outline area and are illustrative. Approval of reserved matters relating to landscape for the outline element will be sought in the future and it is envisaged that such applications will be made in parallel with the reserved matters Blocks 1-7 but with potential to come forward independently.

58 The proposed landscaping/public realm works will replace the part of the Local Open Land area which will be lost through the Phase 1A residential development including a small increase in the amount of landscaped, attractive and useable open space available to the public.

59 The proposed layout of the new College Green area allows for a mix of uses for active and passive recreation and opportunities for informal sport, including features for skateboarders. The space will comprise soft and hard landscape areas to include space for events such as markets and outdoor theatre performances. Three raised planters will provide soft landscaped grass areas totalling approximately 1,530 sq.m. with proposed tree planting and timber benches will be integrated into the planter edges to provide seating opportunities.

60 At the western end large structural steel light columns are proposed which as well as providing functional lighting will provide a sense of enclosure to this end of the open space without interrupting views into Fair Field. The columns are designed and located to relate to Fairfield Halls and the existing Croydon College frontage and proposed Block 4 to provide a unified frontage when the site is viewed from the west.

61 A further key element of the proposed landscape and public realm works is to the Fairfield Halls frontage. The existing car park (now closed) will be removed and the area resurfaced with a natural stone emphasising the remodelled entrance to Fairfield Halls. Further seating areas and sculptural lighting are provided with the existing drop-off facility retained but revised with two coach and three taxi waiting spaces to be provided, together with cycle stands. The existing cluster of trees on the edge of the application site will be retained but a second cluster of trees to the east will be removed to increase the visibility of the Fairfield Halls frontage. The existing trees along the Barclay Road frontage will be also be retained.

62 Other elements of the public realm proposals which would be provided as part of the Phase 1A development but will be removed in later phases are: a pedestrian ramp to provide level access from George Street to the Phase 1A residential development; temporary hoarding of the Block 7 site; and a temporary screening fence 3 metres high and planted with flowering climbing plant to the south of the Phase 1A site to provide an attractive edge to the circulation route and for the outlook of the ground floor dwellings, which will be removed on development of Block 6.

Gallery

63 Phase 1A includes the provision of a large flexible D1 gallery space and ancillary facilities within the existing basement car park beneath College Green covering an area of approximately 2,229sq.m. A large entrance foyer of approximately 348 sq.m. will be incorporated within the cloister extension to the northern elevation of Fairfield Halls. The gallery space will be designed with moveable and adaptable walls to provide flexibility for displays and the ancillary facilities at basement level will include storage area, a designated loading/unloading area, offices and toilets.

Case history

64 The application has been subject to the GLA pre-application process and an advice report was issued on 18 December 2015. The case history of the sites have been included in the former text as this is integral to how the application proposals are interpreted.

Strategic planning issues and relevant policies and guidance

65 The relevant issues and corresponding policies are as follows:

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

66 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).

67 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 land use

68 The principle of development of both outline and full applications is considered against the guidance relating to London Plan policy for the Croydon Opportunity Area and the Croydon Opportunity Area Planning Framework (COAPF). As this is a hybrid application the land use mix is set out for the overall scheme and further broken down separately between outline masterplan and phase 1a full application floorspace.

69 The hybrid application is proposing a high degree of flexibility in relation to floorspace and has set two parameters, a minimum of 152,268 and a maximum of 423,131 sq.m. (table 1), which are separated into floorspace delivered by the outline masterplan part of the application and that delivered by the full application for phase 1a.

Table 1: Hybrid application overall land use mix

	Hybrid application use Min (Sq.m)	Hybrid application use Max (Sq.m)	Differential max/ Min (Sq.m)
Retail/financial and professional services/ food & drink and or Non-residential institutions/ Assembly & leisure (A1/A2/A3 and /or D1 and or D2)	515	515	0
Retail/financial and professional services/ food & drink (A1/A2/A3)	3,217	18,415	15,198
Food & drink (A3)	139	139	0
offices (B1)	30,842	96,651	65,809
Hotels (C1)	0	8,342	8,342
Residential (C3)	79,621	216,523	136,902
Non-residential institutions (D1)	23,430	47,687	24,257
Assembly & leisure (D2)	1,284	11,842	10,558
Car Park	13,220	23,285	10,065
Total	152,268	423,399	271,131

Masterplan

70 The outline masterplan proposes a range of uses including residential, commercial, retail, leisure, education and community uses and flexibility is sought for between 128,765 sq.m. and 399,895 sq.m. of development (table 1) .

Table 1: Masterplan land use mix

	Masterplan use Min (Sq.m.)	Masterplan use Max (Sq.m.)	Differential max/ Min (Sq.m.)
Retail/financial and professional services/ food & drink (A1/A2/A3)	3,217	18,415	15,198
offices (B1)	30,842	96,651	65,809
Hotels (C1)	0	8,342	8,342
Residential (C3)	60,510	197,412	136,902
Non-residential institutions (D1)	19,692	43,948	24,256
Assembly & leisure (D2)	1,284	11,842	10,558
Car Park	13,220	23,285	10,065
Total	128,765	399,895	271,130

Phase 1a (full application)

71 The phase 1a full application is for 28,079 sq.m. of development and will deliver the early phased redevelopment of Fairfield Halls and a mixed use scheme of 194 residential units other uses (table 3).

Table 3: Phase 1a full application

	Full application use Min (Sq.m)
Retail/financial and professional services/ food & drink and or Non-residential institutions/ Assembly & leisure (A1/A2/A3 and /or D1 and or D2)	515
Food & drink (A3)	139
offices (B1)	0
Hotels (C1)	0
Residential (C3)	19,111
Non-residential institutions (D1)	3,739
Assembly & leisure (D2)	0
Car Park	4,575
Total	28,079

Land use evaluation

72 The hybrid application for the outline master plan and the full application for phase 1A are 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.”

73 This proposal would deliver significant regenerative benefits within the opportunity Area and is supported by London Plan policy.

Residential

74 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.

75 The masterplan proposal has set a minimum and maximum floorspace for the residential aspect of the development this would deliver between 677 and 2,209 units. The minimum floorspace would deliver approximately 47% towards Croydon's annual target, whilst the delivery maximum floorspace would deliver 150%. It would also deliver 9% -30 % of the indicative minimum housing target for the Opportunity Area. The application for Phase 1a is for 194 residential units would deliver approximately 13.5% towards Croydon's annual target or 2.6% of the indicative minimum housing target for the Opportunity Area. The delivery of the residential units is supported by strategic planning policy.

Office

76 The masterplan mixed-use development proposals include the provision and re-provision of 30,842 sq.m (minimum) to 96,651 sq.m. of office floorspace located in blocks 1, 2 and 3 and on the upper floors of blocks 1 and 2 focusing provision at George Street. London Plan policy 4.2 offices states in relation to the loss of office floorspace:

77 The replacement office floorspace 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 masterplan site is located outside this area.

Community uses

78 The application proposals will result in a net loss of community floorspace, but sufficient evidence and mitigation has been provided in relation to the floorspace at Croydon College & Annexe, Fairfield Halls, The Court buildings and College Green to support the masterplan approach to redevelopment through either re-provision, renovation and an agreed relocation process. These issues are addressed in detail later in this report.

Conclusion

79 The applicant's planning statement sets out the existing, approved and proposed uses and analysis of the land use proposal which indicate that the quantum of floorspace is broadly consistent with OAPF and London Plan policy. The quantum of floorspace and land uses proposed is substantial, but the optimisation of residential and non-residential output and densities is expected in Opportunity Areas and the overall floorspace and land use mix is supported. Sufficient information has been provided to give assurance the loss and re-provision of community floorspace to not raise strategic concerns in relation to London Plan policy.

Community use

80 At the pre-application stage GLA raised issues with the potential loss of existing community uses in the masterplan area. This was because the London Plan identifies various types of social infrastructure, namely health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports, sports, places of worship, policing and other criminal justice or community safety facilities, and children and young people's play and informal recreation facilities (paragraph 3.86).

81 London Plan Policy 3.16 (Protection and enhancement of social infrastructure) states that '*Proposals which would result in the loss of social infrastructure without realistic proposals for re-*

provision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.'

82 The supporting text to London Plan Policy 3.16 also makes the following statements of particular relevance:

- Paragraph 3.87 states: *'Loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure re-provision (in health and community safety, for example) to ensure continued delivery of social infrastructure and related services'.*
- Paragraph 3.88 states: *'Open space in all its forms represents an important component of social infrastructure and its protection and enhancement is an integral part of Policy 3.16.'*
- Paragraph 3.89 states: *'Shared and extended use of facilities, including those of schools, commercial and community-based organisations can help ensure the effective use of resources and land, encourage joined-up and coherent service delivery and shared maintenance and management costs'.*

83 Furthermore, London Plan Policy 3.18 states that *"Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand"*.

84 Supporting London Plan policy The Mayor's Social Infrastructure SPG (2015) states "London Plan policy 3.16 allows the loss of social infrastructure where this is part of an overall programme for re-provision, and in doing so responds to the need to rationalise property portfolios across the public estate. In the context of the significant increase in housing targets identified by the plan, more efficient use of land by social infrastructure providers offers the opportunity to address housing and social infrastructure needs at the same time, and also to help fund this reorganisation of infrastructure provision" (pages 20-21).

85 The applicant's planning statement sets out thoroughly the existing and proposed communal D1 and D2 floorspace and it is accepted that the masterplan proposed development will result in a net reduction in the overall floorspace of existing community facilities of between 1,005sq.m. and 35,608sq.m.

Croydon College & annexe

86 The masterplan development proposals would result in a net loss of between 19,815sq.m. and 29,988 sq.m. (inclusive) of education floorspace associated with the Croydon College site which will be redeveloped for blocks 4 and 5 for a residential led development. The applicant has put forward the case for the Fair Field campus redevelopment and that this is supported by a letter in the applicant's Planning Statement (appendix 4) that sets out the case for a new build education facility replacing the existing Fairfield Campus buildings and annexe in the block 7 development proposals. These are primarily based on the inefficiency of the existing buildings which have large areas of underutilised space and that the existing building is too outdated to meet modern education needs.

87 The inefficiency case is that the building has a total of c48,381sq.m. (GIA) and this includes basement level floorspace of 5,463sq.m. (GEA), the floorspace provided at ground level and above is 35,130 sq.m. (GIA). This means that only 28,104 sq.m. (NIA) is useable floorspace and this ratio of GIA to NIA is evidence of the buildings' inefficient use of space (by approximately 20%).

88 The outdated facility arguments are that the Fairfield Campus was built in the late 1950s and completed in the early 1960s and as a result of the building's age it has become expensive to operate and maintain and Croydon College's annual budget for maintenance does not allow for larger capital costs which would be required to improve the efficiency of the building. Approximately 26,000 sq.m. (GIA) has been refurbished over the last 15 years with approximately 10,000 sq.m. remaining to be refurbished with a potential cost of around £20 million. The approach of continuing the renovation and modification of the existing building would not address the fundamental problem which is the existing space within the building are no longer configured appropriately for modern further and higher education delivery with too many small rooms and outdated services provision.

89 The Annexe building is also viewed as being underutilised and is in a poor condition and comprises approximately 7,788sqm (GIA) which includes basement level floorspace of 1,367sqm GEA. The primary educational purposes of the building has been substantially reduced since early 2013 when the arts department relocated to the Fairfield Campus building and is currently used for occasional teaching space, storage and on an ad hoc basis for various film and media activities.

90 In both cases it is argued that the evolving further education environment means that colleges have to be positioned to react positively to changes in the Government initiatives such as investing in further education and skills, apprenticeships and working with employers to provide training opportunities and responding to movements in curriculum popularity and content. One important aspect of this is the ability to provide high quality accommodation consistent with modern learning and commercial training environments.

91 The re-provision of the education floorspace is proposed to be accommodated in Block 7 of the outline masterplan. This allows for a minimum of 18,383 sq.m. and a maximum of 28,566sq.m. of class D1 floorspace within two buildings. It is also relevant that Block 6 allows for up to 3,541sqm of D1 floorspace, which due to its adjacency to Block 7 may provide an opportunity for College expansion if required in the future.

92 The applicant is working with Croydon College in progressing detailed plans for the new college within these parameters and this is explained in Croydon College's position statement (Appendix 4) which indicates that the College is fully supportive of these proposals – the submitted documentation sets out a range of College building re-provision options. It is accepted that the masterplan offers an opportunity to provide a modern College building to meet its aspirations, because the demolition and development of the existing site for housing would help fund the new campus buildings and it is made clear that this would not occur until the new buildings are delivered. This requirement should be included as either a condition or as a clause in the s106 agreement.

Fairfield Halls

93 At the pre-application stage specific issues were raised in relation to the renovation and redevelopment of Fairfield Halls. This was because concerns were raised over the closure of the facility, whether a phased redevelopment could be adopted and what interim steps have been put in place in regards to the Croydon cultural offer whilst the redevelopment was being undertaken. The applicant has in response provided in its planning and design & access statement assurance over the renovation and development proposals to address the issues raised by GLA officers.

94 Fairfield Halls is identified in Croydon's Council's Infrastructure Delivery Plan (2014) (IDP) as being Croydon's '*principal cultural venue and community meeting place for over 50 years*', it further notes that the building is in need of investment and parts are nearing the end of their useful life and that '*the inflexibility of the spaces makes the venue increasingly difficult to remain economically viable*'. These issues are addressed in Croydon Local Plan CLP1 Policy SP3 which states '*The Council will promote the remodelling of the Fairfield Halls for its retention and ongoing development as a performance Facility*'. The planning statement also states that '*Fairfield Halls management has confirmed that the proposed works are critical for the Halls to continue operating in a sustainable way*'.

95 The application proposals establish that in addition to the extensive refurbishment works taking place to the exterior and interior of Fairfield Halls, approximately 3,739 sq.m. of new floorspace is to be added to Fairfield Halls although 220 sq.m will be removed, a net gain of space of 3,519 sq.m. will be achieved. In addition to the new floorspace, additional useable roof terrace space is also proposed and at the completion of Phase 1A works Fairfield Halls will comprise 23,266sqm GIA of community/cultural floorspace.

96 The Phase 1A residential development and the development of Block 4 and Block 5 will contribute to cross-funding these essential works to Fairfield Halls. The complete package of works to Fairfield Halls (internal and external) is an integral part of the business case for the ongoing economic viability of Fairfield Halls and at the pre-application stage it was made clear by the applicant that a phased renovation and development of Fairfield Halls would be more expensive and logistically problematic.

Gallery

97 Phase 1A development proposal includes a gallery comprising 2,577sq.m. of D1 space and this will contribute community floorspace. The gallery will be linked to Fair Field Halls and the delivery of this cultural attraction demonstrates a commitment to renovate the existing building and create a stronger cultural offer at Fairfield Halls.

The Courts

98 The outline masterplan in phase 3 proposes the demolition and redevelopment of the Courts site to create Block 6, which would result in the loss of 8,943sqm of D1 floorspace. The applicant's planning statement establishes the mechanism by which Court buildings can be relocated to a new building or the activities absorbed into existing facilities.

99 Croydon Magistrates' Court and Family Courts (the Courts) is identified as one of two sites owned by Ministry of Justice in Croydon, the other being on Altyre Road. The mechanism identified by the applicant to free up the site for development is the One Public Estate (OPE) programme, which is a pioneering initiative funded by the Cabinet Office Government Property Unit (GPU) and delivered in partnership with the Local Government Association (LGA). The programme is designed to facilitate and enable local authorities to work with central government and local agencies on public property and land issues through sharing and collaboration.

100 Croydon Council has been working with the OPE programme to bring forward relocation and co-location proposals for the large central government estate based in Croydon town centre. There are a series of co-location proposals for central government services within Croydon Council's portfolio of offices and redevelopment plans emerging for three major government properties, with a new co-location hub proposed. The Council is exploring opportunities to work with the Ministry of Justice, through OPE to review its needs and aspirations for its sites in

Croydon and the applicant's planning statement indicates that *'further discussion with Ministry of Justice will take place through the application determination period and beyond.'*

101 The masterplan quite rightly places the court relocation site (Block 6) into the final phase of development due to the complexity of the relocation process. It has however as required by The Mayor's Social Infrastructure SPG and London Plan Policy 3.16 identified a mechanism by which the floorspace and use can be relocated. The applicant should however make contingencies in its plan to account for the Court buildings remaining and what impact this would have in the masterplan proposals.

College Green

102 College Green is designated as Local Open Land in Croydon Council's Proposals Map and the masterplan and Phase 1a application includes the redevelopment of this space. London Plan Policy 7.18 (Protecting open space and addressing deficiency) states in relation to the redevelopment of this space:

"The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate".

103 The existing provision within the application site has been confirmed by Croydon Council to comprise approximately 5,750 sq.m and the application proposals propose to reconfigure and re-provide parts of this space so that there is no net loss. Importantly the proposals will result in a much improved space through a new landscape strategy and the creation of new active frontages facing onto the public realm.

Other community uses

104 The Diocese of Southwark's Croydon Area Mission Team is based at St Matthew's House. The Croydon Area Mission Team comprises a group of people whose charge is to serve the clergy, parishes and institutions of the Croydon Episcopal Area of the Diocese of Southwark. It is understood that their office also allows space for a chapel and a meeting room comprising approximately 211 sq.m. (GIA). The masterplan proposals will provide replacement accommodation for use by the Mission Team within Block 2 which incorporates the same amount of D1 floorspace (211sq.m.).

Conclusion

105 Sufficient evidence has been provided to support the redevelopment of Croydon College's existing Fair Field Campus buildings and annexe and their replacement with the residential led mixed use development and the re-provision of replacement of this floorspace within block 6 of the masterplan. This approach is importantly supported by a letter from Croydon College that sets its support for the approach and the on-going discussions with Croydon Council on securing new buildings to form a campus that meets its current requirements.

106 The issues relating to Fair Field Halls have been addressed and sufficient assurance has been provided that the cultural facility will re-open and be much enhanced through additional floorspace. This is demonstrated by phase 1a providing funding for the renovation and upgrade works, the addition of a new gallery space and the full application schedules the external works as the first phase of the masterplan and this removal of later extension and addition of glazed elevation to the north elevation.

107 Assurance has been given that there will be no loss of public space through the masterplan proposals and a comprehensive landscaping strategy has been established Phase 1a includes the delivery of a rejuvenated civic space at College Green to the north of Fairfield Halls which wrap around the building.

108 At the pre-application stage concerns were raised in relation to the loss of community floorspace and this related primarily to the net loss of education floorspace with the demolition of Croydon College Fairfield building and annexe and the impact of the temporary closure of Fairfield Halls. The applicant has addressed these specific concerns and the wider issue of the net loss of D1 community floorspace and this aspect of the application is compliant with the London Plan.

Housing

109 London Plan Policy 3.3 confirms the pressing need for more homes in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. Part B of this policy states that the Mayor will seek to ensure that the housing need identified in paragraphs 3.17 and 3.18 of the London Plan is met, particularly through provision consistent with at least an annual average of 42,000 net additional homes across London.

110 Furthermore, London Plan policy 3.8 encourages a full range of housing choice. This is supported by the Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social and affordable 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.

111 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).

112 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.

113 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. Furthermore a minimum of 15% affordable housing is expected in all developments and account needs to be given that the OAPF is now three years old and the housing market has since seen an up-lift.

Masterplan (outline application)

114 The applicant's planning statement for the outline masterplan provides very limited information on housing mix and affordable provision. The statement does provide a minimum of 60,510 sq.m. and maximum of 197,412 sq.m and it is calculated the scheme would deliver 677 to 2,209 residential units. GLA officers, following discussions with Croydon Council officers, have subsequently been informed that unit numbers are based on a unit average size unit of 89.4 sq.m

(GIA). and that the affordable housing viability assessment used an average size of 75.4 (GIA) sq.m. There is clearly a need for some consistency between the residential quantum to be delivered by the masterplan.

Housing mix

115 The outline masterplan application does not provide any indication of housing mix and an indication of the target mix should be provided as the Mayor's powers to not allow comment on subsequent reserved matters application. It is understood that some flexibility on housing mix is required but there is a need to identify an initial benchmark from the scheme to evolve from for the Mayor to understand how the scheme will comply with London Pan Policy.

Affordable housing

116 In relation to affordable housing the applicant's development specification establishes guidance on affordable across the outline masterplan sites this is as follows:

'15% affordable housing target across the application site with an aspiration to meet 30%, dependent upon viability. Form and nature of affordable housing is to be considered on a block by block basis as reserved matters applications come forward.'

117 It is welcome the applicant is exploring affordable housing review mechanism options and this is in line with Policy 3.12 and guidance in the Housing SPG, where large multi-phased scheme such as this should be subject to periodic review mechanisms. The affordable housing mechanism proposals would secure reassessments of scheme viability prior to each phase of development to more closely reflect likely costs and values at that future time with the aim of achieving the maximum reasonable amount of affordable housing at that time.

118 The masterplan affordable viability assessment should be subject to independent review and the findings should be shared with GLA officers prior to stage 2 referral and whilst this is welcome a review mechanism will be adopted GLA officers require further details of approach before stage 2 referral and that the finalised affordable offer and affordable housing delivery mechanism should be secured by condition.

Phase 1a (full application)

Housing mix

119 The development housing mix for phase 1a allows for 22.5% three bed units and 48.5% two bed units with 65% of the two beds being designed for four people. This proposed housing mix exceeds the OAPF guidance providing a good balance and choice of accommodation that is compliant with London Plan policy.

Table 4: Housing mix (full-application)

	Number	%
Studio	17	9
1 Bed	39	20
2 Bed	94	48.5
3 bed	32	16.5
4 bed	12	6
Total	194	100

Affordable housing

120 The applicant has completed an affordable housing viability assessment and the initial offer is the provision of 15% or 29 intermediate affordable units (shared ownership) and there are no social/affordable units included in the development. This offer although contrary to London Plan policy, which sets a requirement of 60% social and affordable rent and 40% for intermediate rent or sale, is acceptable in this instance because the profits from this development will be recycled to fund the renovation and redevelopment of Fairfield Halls to re-provide community use facilities for Croydon. The affordable housing viability assessment should however be subject to independent review and the findings should be shared with GLA officers prior to stage 2 referral.

Housing density

121 London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, the design principles in Chapter 7 and public transport capacity. Table 3.2 provides density guidelines in support of this and should be read alongside the opportunity area policies, which expect high density development in such locations.

122 The applicant has not completed an assessment of density for masterplan site and phase 1a development. This should be completed and the density justified in context of the site PTAL, Croydon OAPF and London Plan policy.

Urban design: Masterplan (outline application)

123 Chapter 7 of the London Plan sets out a series of policies about the places and spaces in which Londoners live, work and visit. Policy 7.1 sets some overarching design principles for development in London. Other relevant design policies in this chapter include specific design requirements relating to: inclusive design (Policy 7.2); designing out crime (Policy 7.3); local character (Policy 7.4); public realm (Policy 7.5); architecture (Policy 7.6); tall and large scale buildings (Policy 7.7); heritage assets (Policy 7.8); and heritage-led regeneration (Policy 7.9).

Layout

124 The masterplan proposals are structured around creating new access routes, enhancing the existing public space of College Green and both enhancing the setting and upgrading of Fairfield Halls as a cultural attraction. The overall adopted approach is supported but there are aspects of the layout that require further consideration.

125 A key feature of the masterplan proposals is the breaking of the barrier of the Croydon College Campus building to create a new route and development blocks 4 and 5. The introduction of this new north-south link St Matthew's Walk through the existing Croydon College Campus building is supported as this provides a strong physical and visual linkage to the heart of Fair Field, College Green and Fairfield Halls that area currently lacks.

126 A similar route to the south (from Barclay Road) which is slightly offset from St Matthew's Walk, runs between the two parts of the proposed replacement Croydon College building in Block 7 and also improves the physical and visual connection to the enhanced College Green. It is officer opinion however, that one of the few weaknesses of the masterplan is the necessity of the bridge connection between the two college buildings as this both reduces the visual link to College Green and St Mathew's Walk and introduces unnecessary over shadowing of a primary pedestrian connection.

127 The eastern edge route formed by Station Link North and Station Link South will improve connections to East Croydon Station and the tram interchange. The proposals for the north link require the redevelopment of the Mondial House site which is very different in layout but not in parameter height from the recently submitted application (D&P/3480/01) and those in the consented schemes for 101 George Street site (D&P/1585c) and land adjacent to Croydon College (D&P/3322).

128 Pivotal to the masterplan is the re-design of College Green and renovation and redevelopment of the Fairfield Halls building. Currently College Green fails to function effectively as one of the largest civic spaces in Croydon due to inactive building edges, a limited number of poor unattractive pedestrian linkages and a lack of attractors to generate footfall. The masterplan seeks to enhance the setting of College Green and create active edges and this it does effectively. Most notable is the addition of a new north extension Fairfield Halls that offer both a glazed edge building containing a new entrance to the Ashcroft Theatre, cafe, retail unit and entrance to the new proposed Gallery in the basement level car park. Phase 1B provides a new eastern edge which will be activated through a frontage provide by new replacement Croydon College building (which will complete the courtyard edge to phase 1a). Whilst the northern edge has a parameter plan that indicates a 50-100% active edge and western edge although kept open is addressed through the locating of sculptural light columns that define the edge.

129 The masterplan has based the residential development in perimeter blocks with courtyards or podium level spaces and creates a strongly defined edge to the railway through a linear form development where the tallest buildings are located. This approach is strongly supported as the perimeter block form allows for a clear definition of public and private space, but the applicant should reconsider the need for permeability through the blocks 4 and 5 as this effectively removes the effectiveness of the design solution.

130 At pre-application stage discussion focused on the importance of residential blocks having entrances to the street and ground floor activation on the key pedestrian routes. The masterplan has addressed this issue very effectively and the outline masterplan has demonstrated this through indicative layouts and guidance that establishes this principle of active commercial edges on the ground floors in key locations on George Street (blocks 1 and 2) and facing College Green (blocks 4 and 5).. Furthermore as requested the applicant has highlighted potential core locations and how eight units per floor accessed from a single core can be achieved and the importance of identifiable entrances and defined access cores.

Height & Massing

131 The massing approach is based on the maximum of height of buildings being to the north and east of the masterplan area facing George Street and defining north-east edge to the London to Brighton railway line and intermediate heights dropping from north to south around Fairfield Halls. This overall strategic approach is supported as it provides a strong edge and barrier to the railway line and insures overshadowing is limited to the edge of the masterplan and does not over dominate the setting of Fairfield Halls and rejuvenated College Green civic space. The parameter plans seek a high degree of flexibility, but the indicative masterplan and design guidance does provide clear enough guidance to secure this principle.

132 The adoption of perimeter block and/or podium form of development across the masterplan urban blocks is supported as this allows for clearly defined private amenity space and door-step play areas (subject to resolving areas of blank ground floor facade). Notwithstanding this there is some concern with the maximum parameter massing for Blocks 4 and 5 and whether the internal courtyards will receive a sufficient level of daylight penetration into the shared communal courtyard spaces and the applicant should provide some assurance on this issue – as

stated in the section below in relation to Phase 1a the stepping of massing in the courtyards would improve the nature of this enclosure.

Securing design quality

Design/ residential quality

133 The outline masterplan sets out broad layouts for each of the development blocks with the access and the floorplan arrangements for all development blocks. These show the location of primary and secondary entrances are to be located either to street or public space across the whole development; the possible location of cores and how eight units per floor can be achieved; and where active commercial frontages should be located; and where shared amenity space can be located at podium level and shared courtyards.

Parameter plans & development specification

134 As requested at the pre-application stage the applicant has provided a range of parameter plans, development specification and design guidelines document that secure the masterplan layout, development features, residential quality and compliance with London Plan and Housing SPG guidance. The parameter plans are as follows:

- Parameter Plan 1: Application site boundary.
- Parameter Plan 2 and 3: Maximum extent of demolition
- Parameter Plan 4a, b and c: Minimum and maximum building footprints.
- Parameter Plan 5: Public realm and open space
- Parameter Plan 6: Active frontages, ground floor
- Parameter Plan 7 and 8: Minimum and maximum building heights
- Parameter Plan 9, 10, 11 and 12: Basement, ground floor, first floor and mezzanine, typical upper floor uses.
- Parameter Plan 13: Land uses, roof
- Parameter Plan 14: Pedestrian and cycle access, ground floor
- Parameter Plan 15: Vehicular access and circulation, ground floor

135 The parameter plans and design guidelines provide sufficient detail to secure the layout as presented in the masterplan and the overall development quality of potential development within these parameters has been demonstrated in the individual block plans and street/pedestrian route design guidelines which set out how site options that can be achieved and coordinated.

136 There are however some additional guidance that GLA officers require to be added to the development specification General Commitments:

- A parameter plan should be provided that secures broad locations for children's playspaces and expected size of space to be accommodated.
- Principles of residential design should include an additional paragraph that establish that the residential blocks should aim to achieve maximum number of 8 units per floor from a single access core unless exceptional design reasons is demonstrated.
- Layouts should ensure no studio units are single aspect and north facing. Also include text that single aspect flats will need to demonstrate that all habitable rooms are provided with adequate ventilation, privacy and daylight.

- Principles of residential design should include an additional paragraph that secures a minimum finished floor level and finished ceiling heights of 2.5 metres in residential units.

137 The finalised parameter plans and development specification should both be secured by condition in the planning permission Heads of Terms.

Heritage & views

138 The applicant has provided some views of the masterplan and phase 1a development together with a broad overview of heritage impacts, but there is a lack of detail on how the detail scheme and wider masterplan will sit in the wider Croydon townscape and in panoramic views. The applicant should complete rendered views and wireframes of the detailed scheme and maximum parameter built form to have a greater understanding of the masterplan in its strategic context.

Urban design: Phase 1a (full application)

139 The phase 1a application will set the benchmark for the remainder of the residential development and the overall approach is supported. It delivers the external works to Fair Field Halls and much of the new public realm related to the rejuvenation of College Green as a civic space.

Layout & public realm

140 The Phase 1a layout will bring forward the eastern part of Block 7 with the western part of the block being formed by the proposed new Croydon College Campus building. It also creates the first part of Station Link South with a linear residential development running parallel to the London to Brighton railway line. A perimeter residential block forms part of development providing part of a street edge and whilst a clear definition of the railway line is created. The layout appears robust enough to function as a free standing scheme should the Block 6 (occupied by the Court buildings) phase either be delayed or not delivered. The perimeter block should however work as part of the townscape as in the short to medium term the block will be incomplete and it is important that the gable ends, temporary edge has a permanent feel with a high quality landscaped edge and fencing enclosure – this is important given any potential delay in delivering the eastern edge (block 7).

141 As requested at the pre-application stage the applicant has addressed the need to create an inclusively designed accessible link to the Hazeldean Bridge connection across the London to Brighton railway line with the integration of a glazed lift in the proposed tower (Block A) and this is welcome.

Farfield Halls renovation

142 The renovation and external works to Fairfield Halls and the proposed new glazed extension on the north elevation and the linked addition of a new gallery utilising the existing car park basement are strongly supported. The design proposals effectively reinstate the integrity of the original design whilst enhancing the buildings relationship to its surroundings. Additional new build elements are a light touch additions to the building and improve its ground floor layout enhancing the public realm interface through the new glazed north extension, enhancement of existing entrances, the tucking away of the service yard and the addition of the new roof top gallery on top of the Ashcroft Theatre.

Landscape proposals

143 The landscaping proposals delivered by the phase 1a application include a rejuvenation of College Green, the public realm wrapping around Fairfield Halls and the residential led proposals and definition of key linkages to the west of Croydon College Campus Building and the Hazledean Bridge. The division of the former green into a fragmented soft/hard landscape is supported as this allows for improved permeability through the space, allows the retention of raised grass and tree planted areas, whilst also creating spaces for outdoor events linked to Fairfield Halls and the new Gallery. A materials palette of bands of high quality/durable natural stone with concrete pavers and a lighting strategy of sculptural light columns, recessed lighting on planter bases and on handrails at key entry point to Hazledean bridge as well as those to be mounted on the building will ensure the public spaces are secure and safe throughout the day.

Height, scale & massing

144 The massing approach secures the linear edge to the London to Brighton railway line proposed by the masterplan and is support as the tall building of 21 storeys (block A) marks the entrance to the Hazeldean Bridge and continues the cluster of tall buildings emerging around East Croydon railway station and the adjoin eight storey linear block B offering an appropriately scaled block to the railway line that also acts as a sound buffer to the rest of the masterplan area. The development also delivers in Block C (8 storeys) and D (4-6 storeys) three quarters of a perimeter block and the height and massing is supported as this allow for generous internal communal amenity space and allows a high degree of daylight penetration (once the block is complete).

145 Despite the 21 storey tower being located on the outer edge the OAPF tall building area locations, its height is supported as it forms part of a planned linear edge of tall buildings on the edge of London to Brighton railway line and defines a key entry point to the masterplan area. The proposed sequence of building blocks are scaled appropriately to define to Hazledean Walk, Station Link South and future definition of Fairfield Walk (through Phase 1B). The dropping of height to 4 storeys facing the Law Court (masterplan final phase) is of a suitable scale to allow the narrow route of College Walk (before the final phase) not to overshadow or dominated and in the short to medium term not overlook the operational Croydon Court buildings.

146 The courtyard block massing adopts a stepped back form and this allows for both improved openness to the space and private amenity spaces to the blocks and this approach is commended and should be considered as an exemplar for later outline phases of the masterplan.

Layout and residential quality

147 The phase 1a is of a good residential quality and this is welcome as it sets a number of appropriate benchmark for later phases of the masterplan. The applicant as requested at the pre-application stage has ensured that residential cores are prominent in the street/ public realm network and are from the street.

148 The tower (Block A) has due to it slimness ratio has a maximum of four units per floor from the single core and all units are compliant with London Plan space standards. There is however some concern over the single aspect studio units facing the railway line the plans should be amended to allow for additional elevation windows or floor plans reorganisation to provide alternative orientation.

149 Block B has ground floor unis access from Station South link as well as access core to upper floor units from the street that allow for deck access from the railway line edge. This layout approaches is welcome as it provides a good degree of active street frontage and all units are dual

aspect and substantially exceed London Plan unit space standards with the deck access providing an important degree of separation from the railway line.

150 The first phase of the perimeter block residential units are of a good quality design based around a well proportion central amenity space with further amenity space at roof level. Block C is designed to accommodate ground floor commercial units facing Hazledean Walk frontage with the access core from Station South Link to the deck access units above. This is supported given the active edge created to the public realm by the retail units and that all the units exceed London Plan space standards and are nearly all are dual aspect (with the exception of two units).

151 Block D provides street edges to Hazledean Walk and College Green Walk. The Hazledean Walk residential block have two prominent access cores onto street and through to the courtyard, the three units wrap around the cores and all exceed London Plan space standards with a proportion that are single aspect (but all face the courtyard and offer an acceptable outlook) and the majority are dual aspect. The residential block facing College Green walk are access from the courtyard and again all exceed London Plan space standards and are dual aspect, however it is officers opinion that the proposals would benefit from the units these units being accessed from the street as this would improve surveillance and activity.

Building appearance & materials

152 The design & access statement clearly sets out the building appearance with a consistent palette of materials used across all blocks but varying in degree on dominant material. Key features of the development appearance are as follows:

- The 21 storey tower is predominantly precast concrete clad with some brick panels with glazed window openings to the residential units on alternate half or edge of the elevations with a glazed active ground floor frontage that also accommodates a lift access up to Hazledean Bridge. It is officer opinion that the building would benefit from a warmer palette of materials and although it has a well-defined based and middle section there is a need for more emphasis on the crown of the building.
- Block C elevation has a northern elevation has grid structure which accommodates ground floor commercial units, with grid form bayed balconies in the middle portion and an all glass frameless facade at upper levels. The north east corner steps up in height where the block is predominantly concrete panelling with the only break being a corner glazed opening. The design approach is welcome as it provides a strong active frontage in a key location on the masterplan, but the applicant should consider using the expanses of panelling for public art as a feature on the north south route.
- Blocks B and D both have predominantly clay facing brick elevations with well proportion window spacing and both blocks facing Station Link South having prominent glazed access cores in the facades with lit panelling at the entrances. The ground floor units also have well defined landscaped privacy area from the street. Internal elevations are also clay facing brick and only the upper rooftop areas are precast concrete.

Access

Masterplan

153 The Fair Field – Stage 2 Access Statement positively received, but it does not use the most recent GLA guidance has recently been up dated or the recently revised Housing SPG. The principle concerns raised in relation to eth masterplan are:

- There is a query over which tactile paving is proposed to segregate path routes and functions in shared streets and kerb free areas. This detail is missing and what the material is will be paramount to its acceptability for visually impaired users of the area.
- All seating in public spaces should include accessible seating but this isn't mentioned.
- If the residential blue badge parking does not have transfer zones on both sides as per Part M then there should be an Access Management Plan to ensure that spaces are allocated according to need. It should be confirmed that there is one blue badge parking bay per M4(3) unit as required by the Housing SPG.
- The changing places facility is very much welcomed. It would be better if there could be a local agreement to ensure that it was open during the day when the cafe was in use but theatre performances were not so it opened up the café as an accessible venue.
- There is no mention of handing the new accessible WC's so that there is a choice of transfer. The back of house accessible shower, changing and toilet facilities are being provided.
- The section on play areas should refer to the Play and Informal Recreation SPG.
- Some of the M4(3) layouts show the wheelchair storage area overlapping with the 1,500mm turning circle by the entrance door, these should not be overlapping.

Children & young person's play

154 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.”*

155 Children and young people need free, inclusive and accessible spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan seeks to ensure that all children and young people have access to such provision. The challenge facing boroughs and their partners in play provision will be to find opportunities to retain and increase the provision of play and informal recreation, particularly in housing developments.

Outline Masterplan

156 The applicant has completed an assessment of child yield based on assessment of all the development blocks which estimates a total requirement of 2,637 sq.m. of playspace Its play strategy envisages the provision of play opportunities through a two-tiered approach Fair Field:

- Improving connectivity to the network of green open space and to overcome barriers to movement such as busy roads.
- Providing on site playspace within the residential courtyards for doorstep play add the public realm of College Green.

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- Providing on site playspace within the residential courtyards for doorstep play add the public realm of College Green.

158 The play space strategy by age group established by the applicant's design & access statement is as follows:

- Infants & Toddlers (0-5): Playspaces for this age group will be provided as part of doorstep-play, with playspaces within the development blocks. Besides play in the private gardens, the communal courtyards allow for play outside the immediate home in a safe environment that allows for passive supervision. Communal courtyards will be provided with small scale play equipment as well as build-in play features and additionally, supervised visits to the equipped play area in the public space (e.g. In Park Hill Park) complement play provisions.
- Young children (5-8): The play of young children is characterized by first unsupervised forays into the public realm. While communal courtyards allow for an easily accessible play environment, equipped play areas in the public space (e.g. Park Hill Park) as well as the pedestrian friendly qualities of the Residential Link will provide varied play opportunities. Older children (8-14): A mobility radius that spans beyond the immediate neighbourhood allows this age group to access to a wide variety of play and sports facilities within context of Fair Field and beyond. These allow for passively supervised play and sport during this age.
- Teenagers and young adults (12 onwards): The College Green, Residential Link and Park Hill Park provide space for different activities while simultaneously ensuring public supervision and existing facilities outside the neighbourhood.

Full application

159 The applicant has completed an assessment of child yield and converted this in to a playspace requirement for the phase 1a residential development. In order to provide on-site facilities a total area of approximately 207 sq.m. dedicated to play within the phase 1 residential element is required. This doorstep play requirement has been met in part through a courtyard playspace, the applicant should however detail how doorstep play will be met for the 21 storey tower (building A) and building D.

Energy

160 The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

161 The applicant should provide the carbon emission figure in tonnes per annum for each stage of the energy hierarchy for each part of the site as well as for the total site. The applicant is also required to provide the carbon savings after each stage of the energy hierarchy for the site-wide detailed and outline parts of the development. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

162 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 efficient plant and lighting.

163 The applicant has stated that Criterion 3 has been used as a form of overheating analysis for the extension to Fairfield Halls, The Gallery and Phase 1A of the Residential Development. The applicant has outlined the measures proposed which include passive design (window size and orientation), local shading, effective solar protection (g-values) and internal blinds. All non-residential spaces will have sufficient ventilation either via mechanical ventilation and comfort cooling or by the aid of opening windows and natural ventilation. Evidence should be provided to demonstrate that the cooling hierarchy in Policy 5.9 has been followed and that the dwellings are not at risk of overheating now and in the future. Dynamic thermal modelling in line with CIBSE guide TM52 and TM49 for the detailed phase of the development should be provided to support any statements made.

164 The outline part of the development is estimated to achieve a reduction of 5,625 tonnes per annum (34%) in regulated carbon dioxide (CO₂) emissions compared to a 2013 Building Regulations compliant development. The expected carbon savings for the detailed part of the development have not been provided on a site wide basis. The applicant should provide the carbon emission figure and the carbon savings in tonnes per annum for each stage of the energy hierarchy for each part of every phase of the site as well as for each phase of the total site.

165 The applicant has used IES Virtual Environment software to estimate the CO₂ emissions of both the non-domestic and the residential elements of the site. This is not in accordance with the GLA guidance. The applicant should revise the calculation methodology associated with the residential elements and use the relevant Part L approved software (SAP 2012) in order to establish the residential CO₂ emissions and savings under each stage of the Energy Hierarchy. Sample SAP worksheets (both DER and TER sheets) for the detailed phase including efficiency measures alone should be provided to support the savings claimed.

166 The applicant has calculated the savings from the incorporation of the CHP during the 'baseline' or 'be lean' scheme. This is not in accordance with the Mayor's Energy Hierarchy. Following the GLA guidance, any savings from low-carbon heat sources should be taken into account during the second step of the energy hierarchy i.e. the 'be clean'. The applicant should revise any models where the CHP savings have been included in the 'baseline' or 'be lean' scheme and provide revised output files and results where the 'be lean' scheme includes passive design and energy efficiency measures only.

167 The applicant has referred to the London Heat Map which indicates that the application site is located in area that has been identified as an opportunity area for district heating. The applicant has undertaken discussions with Croydon Council's Sustainable Development & Energy Department about the proposed central Croydon district heating network scheme. The applicant has stated that it was agreed that the application site district heating network will be left with a valve set to allow for the future connection of the proposed central Croydon district heating network into the application site network once it becomes operational. The applicant should provide evidence of this correspondence and should continue to prioritise connection to DH networks.

168 The applicant is proposing to install a site heat network. The applicant has stated that the Fairfield Halls, Phase 1A Residential Development and the Gallery, which form the detailed element of the application, will initially be connected to the district heating network. Blocks 1, 2, 3, 4, 5, 6 & 7, which form the outline element of the application, will be connected onto the district heating network as the future phases 1B, 2 and 3 of the Proposed Development are established. A drawing showing the route of the heat network linking all buildings on the site should be provided.

169 The site heat network will be supplied from a single new energy centre which will be located within the existing boiler house of the Fairfield Halls. Further information on the floor area and

location of the energy centre should be provided. An indicative energy centre layout should also be provided.

170 The applicant is proposing to install two number 800kW heat output gas fired CHP units which will be located in the energy centre and will act as the lead heat source for the site heat network.

171 A reduction in regulated CO₂ emissions of 4,044 tonnes per annum (24%) will be achieved through this second part of the energy hierarchy for the outline phase of the development. The applicant should provide the carbon emission figure and the carbon savings in tonnes per annum for each stage of the energy hierarchy for each part of every phase of the site as well as for each phase of the total site.

172 As stated above, the applicant has calculated the savings from the incorporation of the CHP unit during the 'be lean' scheme. This is not in accordance with the Mayor's Energy Hierarchy. Following the GLA guidance, any savings from low-carbon heat sources should be taken into account during the second step of the energy hierarchy i.e. the 'be clean'. The applicant should revise any models where the CHP savings have not been included in the 'be clean' scheme and provide revised output files and results.

173 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install photovoltaic (PV) panels on the roof of the Arnhem Gallery to generate electricity for the Fairfield Halls Extensions and the Gallery. The PV arrays will be 50 sq.m. and 30 sq.m. respectively. The applicant is required to provide a Phase 1 site-wide roof layout indicating the available roof spaces for PV installation and any likely constraints, in order to demonstrate that the carbon savings have been maximised through the incorporation of renewable energy technology.

174 For the outline part of the development, a reduction in regulated CO₂ emissions of 993 tonnes per annum (6%) will be achieved through this third element of the energy hierarchy. The expected carbon savings for the detailed part of the development have not been provided on a site wide basis. The applicant should provide the carbon emission figure and the carbon savings in tonnes per annum for each stage of the energy hierarchy for each part of the site as well as for the total site.

175 The applicant has stated that ASHPs are proposed to be used for the Fairfield Halls Extension and Gallery. The applicant should clarify if the ASHPs will be used for space heating/domestic hot water or just for cooling. If the ASHPs are only proposed for cooling purposes, the applicant should take into account the savings from the ASHP during the 'be lean' scheme as cooling from ASHPs is not considered renewable source.

176 Based on the energy strategy submitted at stage I, the development will produce a reduction of 10,662 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 64% for the outline phase of the development. The applicant should provide the same information for the detailed phase of development as this has been omitted from the submitted information.

177 The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan for the outline phase. The savings need to be determined for the detailed phase 1a in isolation. The comments above should be addressed before compliance with London Plan energy policy can be verified.

Ambient noise

178 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.

179 The applicant has completed noise and vibrations studies in relation to the London to Brighton railway line and surrounding road traffic. These studies advised mitigation measures for detail design and support the overall massing approach which screens the railway to minimise the impact across the site. Croydon Council should consider an independent review of these studies to ensure that the development is not adversely impacted upon.

Flood risk/drainage

Flood risk

180 The site is within flood risk zone 1 however, the Environment Agency mapping identifies a significant area of surface water flood risk to the east of the Croydon college site. This should be considered by the Flood Risk Assessment and it is likely that some mitigation measures would be needed to reduce the likelihood and/or impact of any such flooding.

Sustainable drainage

181 There are large areas in the local catchment, notably further west around Purley Way, that are at significant risk of surface water flooding, therefore the application of London Plan drainage policy 5.13 will be important for this development and other developments in and around Croydon Town Centre. Given the scale of the development proposals it is considered that a greenfield run-off rate can readily be achieved and the following techniques are likely to be viable:

- Green roofs
- Infiltration/soakaways – subject to infiltration testing
- Landscaping specifically designed to maximise rainwater absorption/attenuation
- Rainwater harvesting
- Permeable pavements
- Design for exceedance – it areas of public realm that are design to flood in the rarer storm events (say 1 in 10 year or less often)

182 The achievement of a successful integrated and sustainable drainage solution will require appropriate consideration of drainage aspects at an early stage in the planning and design process.

Transport

183 The site is found within the 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. The site is also within the Fairfield Masterplan which was also adopted in 2013 and this document also identified a number of transport capacity and infrastructure issues that would need to be addressed through the planning process. Since then the council, GLA and TfL has developed a Development Infrastructure Funding Study (DIFS) which was adopted in 2014 and 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. It should be noted that the Fairfield/ College Green masterplan area represents around a quarter of the developable area and residential numbers within the OA.

184 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.

Trip generation

185 TfL welcomes the Transport Assessment (TA), which has been submitted in support of the application. It is understood that the TA considers the worst case scenario in transport terms which is the maximum residential scenario.

186 Whilst the trip generation assessment provided as part of the TA appears reasonable, given the limited survey samples used TfL has requested further details on the compatibility of the TRICS sites used along with narrative as to why a first principles approach was not used for the office and college uses. Further details of the information required to enable TfL to fully assess the impact was sent to Croydon in a letter dated 24 March 2016.

Car parking

187 The multi-storey car park, accessed from Hazeldean Road will be demolished during phase 1A. Therefore, all parking will be provided within the remodelled Fairfield Halls basement car park. The development proposes a total of 350 public car parking spaces, 19 Blue Badge spaces allocated to the 194 residential units, 38 staff and artist spaces for Fairfield Halls, 30 Croydon College Staff spaces and 2 staff, with an additional 2 Blue Badge spaces provided for the proposed gallery.

188 The TA states that the excellent 6b PTAL of the site has dictated the low level of parking provision proposed, so as to not undermine the travel plan objectives of reducing car travel. TfL supports this approach, and therefore is disappointed that staff parking spaces have been allocated to Fairfield Halls, Croydon College and the Gallery. Although the number of spaces allocated to each use has been reduced from the existing provision, TfL would expect only Blue Badge parking for employees and visitors to be provided, with no standard spaces allocated to staff. This would further encourage sustainable travel and help to meet the Travel Plan's targets as mentioned above. The applicant should review the number of spaces provided for each of the above land uses and reconsider the Blue Badge provision taking London Plan standards into account. The applicant's commitment to provide Electric Vehicle Charging Points (EVCP) is welcomed, however 20% active with a further 20% passive should be provided for the residential aspect.

189 London Plan policy 6.13 requires one Blue Badge parking space to be provided for every accessible unit, 10% of the total number of units should be accessible. Phase 1A proposes 19 Blue Badge parking spaces for the 197 residential units which meets the London Plan standards.

190 It is understood that for phases 2 and 3 the car parking provision will remain the same, except for additional residential Blue Badge parking spaces, all welcomed by TfL. The maximum number of residential units proposed within the masterplan area is 2,403, meaning a maximum of 240 Blue Badge spaces would be required. The TA states that parking provision will be monitored throughout phase 1A and this will inform the parking provided for phases 2 and 3. Whilst TfL stated at the pre-application stage that given the proximity of the station and if there was a step free route to the station and to services there, it may be acceptable to include a lower level of Blue Badge Parking, TfL would not support general residential parking to be provided instead as suggested in 4.97 of the TA.

191 It is understood a Car Parking Management Plan (CPMP), to be secured by condition will provide details on the management and allocation of the spaces. The applicant is reminded that the spaces should all be leased rather than sold with the individual residential units to allow for future flexibility.

192 The information on the displaced commuter parking spaces estimates that out of the total 242, whilst most will use existing town centre car parks, some will alternate their journey to a non-car mode of travel. Therefore, the Travel Plan for the development should also carefully consider the loss in parking spaces, encourage and support alternative modes of travel.

193 It is understood that through discussions with Zipcar and it has been confirmed that one car club spaces is sufficient to accommodate the demand generate from phase 1A. This space will be provided on College Road and should be secured through the section 106 agreement. The discussions also informed the applicant that up to four car club spaces are likely to be required if the maximum residential scenario is implemented. TfL understands that if needed, all spaces will be provided at street level and the exact locations will be agreed later.

194 The applicant has also confirmed that up to three years Car Club Membership will be available for all residential units and this will also be secured through the section 106 agreement, welcomed by TfL. The legal agreement should also include a clause restricting residents from applying for parking permits within the local CPZ area. This should apply to on street spaces as well as council car parks for all residents.

Cycle facilities

195 The TA states that phase 1A will consist of a total of 370 long stay cycle parking spaces will be provided, with an additional 123 short stay. This is in accordance with the London Plan policy 6.9 and welcomed by TfL. The proposed locations for both the short and long stay parking is considered satisfactory and TfL welcomes the security measures put in place for long stay storage.

196 TfL requests more information is provided on the quantum, location and management of the cycle parking for the later phases. As previously stated at the pre-application stage, information on how the phasing of the cycle parking will work and allocated across the different land uses should be provided. As the site will be constructed in phases it is essential the cyclists are considered throughout the construction planning, for both parking and routes, with temporary arrangements made for this time if necessary.

197 It is noted that during phase 2 of the development the Cycle Hub located at the junction of College Road and George Street may need to be relocated. Any relocation of existing cycle parking should be agreed with the Council and TfL and users should be made aware of any changes with sufficient signage in place. TfL welcomes the applicant's plans to retain the existing cycle parking in the north-east corner of the development. The cycle hub should be enhanced and expanded where possible.

198 The improved connectivity through the site and cycle routes is welcomed. The applicant is reminded the site layout should consider connecting cyclists to the existing London Cycle Network in the surrounding area.

Public transport capacity

199 As stated above further clarification is required on the trip generation and mode share. Given the very low car parking levels, it is considered that the majority of trips and impacts will be on public transport services, for example buses and trams. TfL requests further clarification on these impacts and how the cumulative impact of this significant development on public transport services, representing a third of the development in the OAPF, will be mitigated. This includes trips for all uses and as a result of the existing car parks being closed. Once this information is provided TfL will be in a position to request s106 contributions towards bus and tram capacity and infrastructure as identified in the OAPF and DIFS study. These changes will be required to ensure accordance with London Plan policy 6.3.

Pedestrian environment

200 TfL welcomes the applicant's commitment to enhance the pedestrian links through the site and improved accessibility, in line with London Plan policy 6.10. It is understood that two new north-south pedestrian and cycle links will be provided through the site with one east-west route. These additional links and improvements, along with areas of public realm are welcomed by TfL. It is suggested a contribution is secured towards Legible London signage to reflect the changes to the site and encourage walking in line London Plan objectives.

201 As the development is to be built out in three phases, it is important pedestrian and cycle access is provided throughout construction and temporary arrangements are put in place if needed. Whilst information on the phasing of the routes has been provided within the TA, this should also be reflected with the CLP for the site.

Coach and taxi facilities

202 The existing site provides a coach and taxi area to the front of Fairfield Halls, which can be accessed from Park Lane gyratory and egressed to the southbound Park Land carriageway. The application proposes to retain this area, but improve the access arrangements for vehicles entering and existing the site and formulise the space allocation for coach and taxi facilities. The access areas will also be shared surfaces to prioritise pedestrian and cycle users.

203 The TA considers the proposals for the Park Land / Barclay Road gyratory put forward as part of the application for the Whitgift Centre and states that the proposed access arrangements for Fairfield Halls have been designed to accommodate these proposals. However, TfL welcomes further discussions with the application on these designs.

204 A Forecourt Management Plan (FMP) has been submitted with the application and identifies management techniques that will be put in place for performances at Fairfield Halls, this is welcomed by TfL and should be secured by condition. It is understood that additional off site coach parking locations for busier periods are been discussed with the council, this is welcomed and in accordance with London Plan policy 6.8.

205 A total of three taxi parking spaces will be provided within this area alongside the coach parking. Whilst this provision is welcomed by TfL, it is considered that the FMP should consider taxi drop off / pick up facilities in more detail. The expansion of the Fairfield Halls and the new development at the site will have an impact taxi trips and this should be recognised within the design.

Bus standing

206 In the pre-application meeting the option of redesigning the Park Lane side of the scheme was suggested by the applicant. Whilst it was confirmed in the follow up letter that TfL would not be able to relocate the routes currently standing on Park Lane to Wandle Road as there would not be sufficient capacity, it was stated that TfL was open to further discussions about the location of the existing standing space. There is no mention of any redesign to Park Lane, however further discussions on the options for buses around the site are welcomed. Considering the number of developments in the area and planned growth for the town centre, and in accordance with London Plan policy 6.2 and 6.7, TfL would welcome any additional standing space and requests this is investigated in the plans for the wider site.

Trams infrastructure

207 It should be noted that the Tram Substation is located adjacent to Mondial House under Hazledean Road and College Road. Therefore, this needs to be considered for any proposals for this section of the site and the developments should be discussed in detail with TfL and agreed prior to submitting full planning application to ensure any Tramlink requirements are included in the design.

Travel planning

208 TfL welcomes the framework Travel Plans submitted in support of the application. The final version should ensure measures to encourage sustainable travel are included and realistic, such as cycle vouchers/free bicycles, marketing and promotional events along with subsidised car club membership as mentioned above. The Travel Plan should then be secured, delivered, monitored and funded through the section 106 agreement.

Delivery, servicing and construction

209 It is understood that the existing servicing areas will be maintained, but reconfigured to make it easier and more accessible for vehicles serving the development. TfL welcomes the improvements and the applicant's approach to servicing with a separate access lane from College Road. Further comments will follow on this aspect of the scheme once TfL has assessed any potential impact the proposal may have on traffic flow. It is requested a Delivery and Servicing Plan (DSP) in accordance with TfL guidance is secured by condition.

210 The draft Construction Logistics Plan (CLP) is welcomed and 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.

211 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.

212 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

213 In summary, additional information should be provided on the trip generation assessment and future cycle parking provision. The car parking spaces provided for the Croydon College and Fairfield Halls should be reduced, with consideration given to taxi and coach facilities. The options for bus standing space around the site should also be investigated.

214 Contributions towards transport improvements within the town centre should be secured, with the Borough CIL used to fund wider public realm and cycle improvements. Tram infrastructure needs to be considered within the later stages of the planning process.

215 The Car Parking Management, Forecourt Management, Construction Logistics and Delivery and Servicing plans should all be secured by condition, with the Travel Plan secured through the section 106 agreement. The legal agreement should also include the provision of Car Club spaces and membership, and restrict residents from applying for parking permits for the application to comply with the transport policies of the London Plan.

Community Infrastructure Levy

216 In accordance with London Plan policy 8.3, Community Infrastructure Levy, the Mayor commenced CIL charging for developments on 1st April 2012. It is noted that the proposed developments are within the London Borough of Croydon, where the Mayoral charge is £20 per square metre Gross Internal Area (GIA). Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>

217 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.

218 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

219 Unknown at the time of report preparation.

Legal considerations

220 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

221 There are no financial considerations at this stage.

Conclusion

222 London Plan policies on Opportunity Areas, community use, housing mix, affordable housing, density, urban design, access, children & young person's play, energy, noise, flood risk and transport are relevant to this application. Whilst the principle of development is strongly supported, a number of minor issues are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Principle of development (masterplan and phase 1a):** The quantum of floorspace and land uses proposed is substantial but the optimisation of residential and non-residential output and densities is expected in Opportunity Areas and the overall floorspace and land use mix is supported.
- **Community use:** At the pre-application stage concerns were raised in relation to the loss of community floorspace and this related primarily to the net loss of education floorspace with the demolition of Croydon College Fairfield building and annexe and the impact of the temporary closure of Fairfield Halls. The applicant has addressed these specific concerns and the wider issue of the net loss of D1 community floorspace and this aspect of the application is compliant with the London Plan.
- **Housing (masterplan):** The information provided in relation to housing mix and affordable housing is not compliant with the London Plan policy as insufficient information and detail has been provided for the outline application to be determined in relation to London Plan policy.

The affordable housing viability assessment should however be subject to independent review and the findings should be shared with GLA officers prior to stage 2 referral.

- **Housing (Phase 1a):** housing mix exceeds the OAPF guidance providing a good balance and choice of accommodation that is compliant with London Plan policy. The applicant has completed an affordable housing viability assessment and the initial offer is the provision of 15% or 29 intermediate affordable units (shared ownership) and there are no social/affordable units included in the development, this is accepted as the funds will be recycled to the fund the renovation of Fairfield Halls which is a clear link to community benefits to Croydon. The affordable housing viability assessment should however be

subject to independent review and the findings should be shared with GLA officers prior to stage 2 referral.

- **Density:** The applicant has not completed an assessment of density for masterplan site and phase 1a development. This should be completed and the density justified in context of the site PTAL, Croydon OAPF and London Plan policy.
- **Urban design (masterplan):** The overall approach of the masterplan layout is strongly supported but the applicant should address the issues raised by the report.

Layout: the applicant should reconsider the need for permeability through the blocks 4 and 5 as these would work more effectively as private amenity spaces and the outer street network would be more strongly emphasised.

Layout & massing: It is GLA officers opinion that one of the few weaknesses of the masterplan layout and massing is the bridging of the route to connect two buildings as this both reduces the visual link through space and introduces unnecessary over shadowing.

Massing & light: There is some concern with the maximum parameter massing and whether the internal courtyards will receive a sufficient level of daylight penetration into the shared communal courtyard spaces and the applicant should provide some assurance on this issue.

Design principles: The applicant should include the additional proposed design principles in its documents that secure development quality.

Heritage & views: The applicant should complete rendered views and wireframes of the detailed scheme and maximum parameter built form to have a greater understanding of the masterplan in its strategic context.

- **Urban design (phase 1a):** The overall approach to the phase 1a design is supported by the applicant should address the proposed amendments to the scheme.

Tall buildings: The tower has due to its slimness ratio has a maximum of four units per floor from the single core and all units are compliant with London Plan space standards. There is however some concern over the single aspect studio units facing the railway line that should be amended to allow for additional elevation windows or floor plans reorganisation to provide alternative orientation.

It is officer opinion that the building would benefit from a warmer palette of materials and although it has a well-defined base and middle section there is a need for more emphasis on the crown of the building.

Residential/ layout quality: The residential block facing College Green walk are accessed from the courtyard and again all exceed London Plan space standards and are dual aspect, however it is officers opinion that the proposals would benefit from the units these units being accessed from the street as this would improve surveillance and activity.

- **Access:** The applicant should respond in full to issues raised.
- **Children & young person's play (full application):** The applicant should detail how doorstep play will be met for the 21 storey tower (building A) and building D.

- **Energy:** The applicant should respond in full to issues raised and provide the requested verification information. The applicant should provide the same information for the detailed phase of development as this has been omitted from the submitted information.
- **Noise:** Croydon Council should consider an independent review of these studies to ensure that the development is not adversely impacted upon.
- **Flood risk:** The site is within flood risk zone 1 however, the Environment Agency mapping identifies a significant area of surface water flood risk to the east of the Croydon College site. This should be considered by the Flood Risk Assessment and it is likely that some mitigation measures would be needed to reduce the likelihood and/or impact of any such flooding. The achievement of a successful integrated and sustainable drainage solution will require appropriate consideration of drainage aspects at an early stage in the planning and design process.
- **Transport:** Additional information should be provided on the trip generation assessment and future cycle parking provision. The car parking spaces provided for the Croydon College and Fairfield Halls should be reduced, with consideration given to taxi and coach facilities. The options for bus standing space around the site should also be investigated.

Contributions towards transport improvements within the town centre should be secured, with the Borough CIL used to fund wider public realm and cycle improvements. Tram infrastructure needs to be considered within the later stages of the planning process.

The Car Parking Management, Forecourt Management, Construction Logistics and Delivery and Servicing plans should all be secured by condition, with the Travel Plan secured through the section 106 agreement. The legal agreement should also include the provision of Car Club spaces and membership, and restrict residents from applying for parking permits for the application to comply with the transport policies of the London Plan.

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