

Crystal Palace Football Club

in the London Borough of Croydon

planning application no. 18/00547/FUL

Strategic planning application stage 1 referral

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

The proposal

Demolition of 6 existing houses and the extension of the Main Stand to increase the stadium's capacity by c. 8000 seats and provide an additional 24,522 sq.m of internal floor space.

The applicant

The applicant is **CPFC Limited** and the architect is **KSS**.

Strategic issues summary

Loss of housing: It is proposed to demolish 6 existing homes to accommodate the proposed Main Stand; 5 of these homes are confirmed to be existing affordable properties. The applicant must confirm the ownership of unit 6 as a priority. The lack of strategy for the re-provision of these homes and the rehousing of the existing tenants is unacceptable; the strategy should have been far more advanced on submission of any planning application to ensure clarity for the Mayor, the Council and the residents. GLA officers will continue to engage with the applicant on this as a priority, noting that draft London Plan Policy H10 and London Plan Policy 3.14 require no net loss of both affordable and market housing. The housing strategy must be agreed prior to the determination of the application and appropriately linked to the stadium's construction and occupation within any S106 agreement.

Sports stadia: The principle of the extension of the Main Stand is supported; it will enhance CPFC's facilities and enable more fans to visit; however, this is subject to the resolution of the housing issue, securing community uses and ensuring wider regenerative community benefits.

Transport: The applicant must seek to reduce the car parking, given local junction capacity and congestion as well as to encourage sustainable transport modes. The Travel Plan must be strengthened and secured through any S106, including all associated funding. Further information is required on: other events that will take place; pedestrian and cycle routes; cycle parking; car parking management; coach parking; taxi drop off and pick up; and construction, delivery and servicing. Financial contributions towards step-free access at Norwood Junction and expanding the local CPZ are required.

Outstanding **urban design** and **energy** issues must also be addressed.

Recommendation

That Croydon Council be advised that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 61. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.

Context

1 On 19 February 2018 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 must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and draft 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 consideration in deciding what decision to make.

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

- Category 1B(c): Development outside Central London and with a total floorspace or more than 15,000 square metres.
- Category 3F: Development for a use, other than residential use, which includes the provision of more than 200 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; 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 Selhurst Park stadium has been the home of Crystal Palace Football Club (CPFC) since 1924. CPFC are currently south London's only Premier League team, following promotion in 2013.

6 The site is bound by Park Road to the east, Whitehorse Lane to the north, Holmesdale Road to the south and an internal road, which runs from Whitehorse Lane to Holmesdale Road. The site is tightly bound into the existing urban fabric: immediately to the north of the site, and sitting partially beneath the Whitehorse Lane stand, lies a Sainsbury's supermarket and Crystals nightclub with 1980s residential units fronting Whitehorse Lane; and two-storey Victoria terraces lies to the south of the site on Holmesdale Road and to the east on Park Road.

7 The site lies within an area of high density, as designated by Croydon Council. The stadium is not listed and does not lie within a conservation area. Croydon Council has designated the north side of Park Road, opposite the site, as an area of Special Character, which is an area that has special local character in terms of its townscape, architectural or landscape character and is, therefore, worthy of conservation.

8 The stadium itself has four stands, all of which were constructed at separate times, with a total capacity of approximately 26,000: Main Stand, fronting the car park and internal road; Whitehorse Lane Stand, accessed from Whitehorse Lane; Holmesdale Road Stand, accessed from Holmesdale Road; and Arthur Wait Stand, accessed from Park Road. Figure 1 shows a plan of the existing stadium.

Figure 1: Existing stadium



9 On home game match days, Park Road, Holmesdale Road and Clifton Road, which runs to the south of the site, are temporarily closed. The Sainsbury's supermarket is also closed on these days. For reference, in the 2015/2016 season, there were 22 first team home games, and 21 for the 2016/2017 season.

10 The site lies approximately 600 metres from Selhurst Station, 615 metres from Norwood Junction Station and 900 metres from Thornton Heath Station. The accessibility rating varies across the site, ranging from 2 and 5 (where 1 is poor and 6b is excellent).

Details of the proposal

11 It is proposed to develop a semi-circular extension to the Main Stand to create a three-tier, 5-storey stand, rising to 41 metres and accommodating approximately 8,000 additional seats, of which 2,500 would be hospitality seats; table 1 details the existing and proposed capacities. The total internal floorspace of the Main Stand will rise to 25,072 sq.m, comprising 24,522 sq.m of football club and ancillary floorspace (Class D2), and a 550 sq.m retail unit (Class A1/A3).

12 The proposed stand will have a larger footprint than the existing stand. To accommodate the increased footprint, it is proposed to demolish 6 homes on Wooderson Close, immediately to the southwest of the existing car park. In addition, the proposals involve the loss of some car parking spaces in both CPFC's car park and the neighbouring Sainsbury's car park.

13 In addition to an enlarged seating capacity, the proposed Main Stand will contain the following internal facilities:

- Ground floor – General admission access, the official CPFC shop, museum, ticket box-office, a retail unit, improved and enlarged 'back of house' players, officials and team staff facilities, a media centre and matchday staff and stewards' facilities;
- Mezzanine level – Hospitality seating access, reception and lounge;
- First floor – General admission concourse and two separate club lounges;
- Second floor – Silver and gold hospitality zones, including boxes, bar and a terrace;
- Third floor – Platinum lounge, directors dining room, boxes and a lounge;

- Fourth floor – General admission concourse; and
- Fifth floor – Media access to press tribune.

14 As illustrated in Table 1, the additional capacity is primarily provided within the enlarged Main Stand; however, approximately 683 additional seats will be provided in the Holmesdale Road Stand due to infilling between the stand and the adjacent Arthur Wait Stand. Capacity is lost within the Whitehorse Lane stand due to the increase in the pitch’s length

Table 1 – Existing and proposed seating capacity

	Seating capacity		
	Existing	Proposed*	Change +/-
Main Stand	5,627	13,500	+ 7,873
Whitehorse Lane	2,725	2,131	- 594
Arthur Wait	9,769	9,769	-
Holmesdale Road	8,176	8,859	+ 683
Total stadium capacity	26,297	34,259	+ 7,962

* approximate number

Case history

15 A pre-application meeting was held at Selhurst Park on 15 January 2018, which comprises a site visit and a presentation of the scheme by the applicant’s architects, KSS. The written pre-application response, which was issued on 15 March 2017, confirmed that the redevelopment of Crystal Palace Football Club’s main stand was supported in principle but noted that any support is subject to the re-provision in size, quality and tenure of any existing residential units demolished. In addition, the note stated that issues relating to housing, affordable housing, football stadia, design and inclusive access must be addressed. Whilst the pre-application advice note was issued on 15 March 2018, after the planning application was submitted, it is based solely on the pre-application discussions and had no regard to the content of the planning application. A separate pre-application meeting was held on 22 January 2018 with TfL and a written response issued by TfL on 2 February.

Strategic planning issues and relevant policies and guidance

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Croydon Strategic Policies Document (2013) and Detailed Policies and Proposals Document (consultation draft, September 2016) and the 2016 London Plan (Consolidated with Alterations since 2011).

- The National Planning Policy Framework and draft amended National Planning Policy Framework;
- National Planning Practice Guidance; and
- Draft London Plan (consultation draft, December 2017).

17 The relevant strategic issues and corresponding policies are as follows:

- Housing *London Plan; Affordable Housing and Viability SPG.*

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*
- Inclusive design *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.*
- Sports facilities *London Plan;*
- Culture *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

Principle of development

18 The redevelopment of the Main Stand is supported in principle, as it will enhance the stadium in terms of quality and in terms of the number of spectators; however, this support is subject to the re-provision in size, quality and tenure of any existing residential units that are to be demolished. Furthermore, any support is contingent on securing a package of wider community benefits as well as addressing outstanding issues within this report.

Loss of existing housing

Policy context

19 Draft London Plan Policy H10 and London Plan Policy 3.14 resist the loss of existing housing, including affordable units, unless the dwellings lost are replaced at the existing, or higher densities, with an equivalent amount of floorspace. Draft London Plan Policy H10 provides further context, stating that any proposal that results in the loss of existing affordable housing will be expected to provide at least an equivalent quantum of floorspace, but should seek to provide an uplift. Any such proposal will be required to submit a financial viability assessment (FVA), in accordance with the threshold approach to viability, as set out in draft London Plan Policy H6 and the Mayor's Affordable Housing and Viability SPG.

20 The need to provide more homes in London is a central tenet of both the draft London Plan and London Plan; at a local level, the draft London Plan sets Croydon Council an annual target of 2,949 homes. Therefore, in addition to replacing any homes that are lost, it is necessary to demonstrate that the proposals will not result in a net loss of housing, with any offsite provision required to be genuinely additional, above that already secured, for example through an extant consent. For the avoidance of doubt, the same additionality principle applies to affordable housing: rehousing social rented tenants in existing affordable housing units within the borough would result in a net loss of affordable units overall and would be unacceptable.

21 In addition to planning policy, the Mayor's draft Good Practice Guidance to Estate Regeneration is also a relevant consideration. The Mayor's draft Guidance provides principles for estate regeneration in London, where estate regeneration is defined as the physical renewal of social housing. As five of the six homes earmarked for demolition are Council owned with social housing tenants, it could be considered to fall within this broad definition of estate regeneration. The Guidance stresses the importance of ensuring transparent, extensive, responsive and meaningful consultation with residents, including clearly articulating all options, consulting residents on options and incorporating residents' views into any strategy to ensure that tenants get a 'fair deal'. The applicant should, therefore, have regard to the broad principles of the Good Practice Guidance.

Assessment of proposals

22 The applicant proposes to demolish 6 houses to accommodate the enlarged Main Stand footprint. With the exception of unit 6, all of the properties are owned by Croydon Council and let as social housing. It is understood that it is unclear whether unit 6 is privately owned and occupied, or privately owned and leased to an RP; clarity on this must be provided as a priority. Table 2 details the existing homes to be demolished for reference.

Table 2 – Existing homes proposed for demolition

Wooderson Close						
Unit number	1	2	3	4	5	6
Tenure	Affordable	Affordable	Affordable	Affordable	Affordable	unknown
Unit size	4-bed	4-bed	4-bed	4-bed	4-bed	4-bed
Gross internal area	595 sq.m*					115 sq.m

*total GIA of all 5 properties

Rehousing of existing tenants

23 The applicant states it will rehouse the 5 existing social tenants in existing homes within the surrounding three wards of Selhurst, Thornton Heath and South Norwood, and Woodside. It is understood that the club intends to purchase 5 market priced homes and then transfer these to the Council, who will rehouse the existing tenants within these properties; this would ensure that the affordable homes are re-provided, albeit in existing housing stock, prior to the redevelopment of existing homes (however, should unit 6 be confirmed as affordable housing, it will be necessary to purchase 6 homes locally). The applicant must provide timescales for this process.

24 Notwithstanding the intentions set out above, the final relocation strategy has not been confirmed. It is acknowledged that the applicant and Council are liaising with existing occupiers and that it was not possible to make re-location plans without understanding each occupier's specific needs; however, it is considered that this process should have begun much earlier than it did, to both provide residents with certainty but also to provide greater clarity when assessing the planning application. The applicant's Statement of Community Involvement does not discuss consultation with the residents of Wooderson Close who it is proposed to displace. GLA officers consider that this is crucial and information on this process must be provided, including: measures to ensure that residents are consulted on the various re-provision options as they are developed; whether the tenants have any specific housing requirements; and confirmation of their successful relocation. In addition, the applicant must detail how the proposals broadly comply with the Mayor's Good Practice Guidance.

Reprovision of existing homes

25 In addition to rehousing the existing social housing tenants, the applicant must re-provide at least the existing quantum of floorspace in Croydon, in both the affordable and market tenures, to ensure that there is no net loss of housing within the borough, in accordance with draft London Plan Policy H10 and London Plan Policy 3.14. The strategy for re-providing the homes that are proposed for demolition has not been finalised. The lack of clarity on the proposed housing strategy is unacceptable as it fails to comply with London Plan Policy 3.14 and draft London Plan Policy H10.

26 The applicant has outlined two high-level strategies for replacing the existing homes in their planning statement: developing 6 homes “on another, yet to be identified site, for which a residential planning permission or allocation does not exist”; or on a site “where residential development would not otherwise have occurred”. The applicant has confirmed that it will not be possible to develop homes on the CPFC site, which was a further option discussed at pre-application stage, due to the constrained nature and the impact of the stadium on these homes.

27 Of the two strategies now presented, the preferred option would be for the applicant to acquire a site, which is not presently allocated for housing or does not benefit from an extant planning permission, and then gaining residential planning permission. Before GLA officers could comment on the second option, developing replacement homes on a site “where residential development would not otherwise have occurred”, further details would be required on the reason for the lapse of planning permission. In accordance with draft London Plan Policy H10 and the Affordable Housing and Viability SPG, a financial viability assessment must be submitted alongside any planning application for the re-provision of the existing homes and any S106 must be linked back to the present application.

28 If the applicant purchases 5 (or 6) suitable market homes and transfer these to the Council, who then lease these properties to the existing social rented tenants, as discussed above, then the affordable homes could be considered to have been adequately re-provided, in accordance with the no net loss principle set out in draft London Plan Policy H10 and London Plan Policy 3.14. As such, it would be necessary to develop 6 market homes elsewhere to ensure no net loss of market housing, as per draft London Plan Policy H10.

29 GLA officers will continue to engage with the Council and the applicant on the strategy for re-providing the existing homes, which must be progressed as a priority and must be detailed prior to the determination of the planning application. The housing strategy must then be secured and linked within any S106 to ensure that the replacement homes, equivalent in tenure, size and quality to those demolished, are provided prior to the stadium’s completion. A payment-in-lieu or a cascade mechanism within the S106 is not considered to be suitable. The S106 agreement, including full details of the re-provision of the existing homes, must be finalised prior to the scheme being referred at Stage 2.

Sports stadia

30 London Plan Policy 4.6 supports the continued success of professional sporting venues, whilst draft London Plan Policy HC5 states that London’s cultural offer, including spectator sports, will be protected and new facilities will be encouraged in areas with good accessibility. London Plan Policy 3.19 and draft London Plan Policy S5 seek to enhance sports facilities, including specialist sporting venues, and maximise the multiple use of facilities. Supporting paragraph 5.5.1 of the draft London Plan states that sports facilities should offer a range of formal and informal social, health and wellbeing benefits to communities.

31 The principle of the enhancement of the football stadium is supported, subject to a full resolution of the above housing issue, securing appropriate community uses and ensuring wider regenerative community benefits, as it will enhance CPFC’s facilities, enable more fans to visit and will ensure the club remain in this part of Croydon.

Community facilities

32 The applicant’s planning statement and socio-economic value assessment note that the proposed stand will allow the Club’s community Foundation to expand. No details, however, have been provided on the space that the Foundation presently occupies or the extra space for the Foundation, and other community groups, that will result from the proposals. In accordance with London Plan Policy

3.19 and draft London Plan Policy S5, the applicant must confirm the existing community uses within the stadium and the extended proposed uses. The re-provision of existing facilities as well as additional community uses must be secured via any S106.

Wider regeneration

33 The existing stadium has grown incrementally since 1924, with no substantial planning applications; as such, there have been limited opportunities to regulate the club's use or improve the quality of spaces surrounding the site. The proposals now present an opportunity to generate a broad masterplan, beyond the application boundary itself, to enhance public realm as well as routes, connectivity and wayfinding, in accordance with draft London Plan Policies D1, D7 and T2 and London Plan Policies 6.7, 6.10, 7.1 and 7.5. GLA officers will engage with the applicant, in conjunction with the Council, to secure a package of wider benefits for the surrounding area.

Urban design

34 Good design is central to all objectives of the London Plan and draft London Plan. Whilst the applicant has engaged at pre-application stage, there remain outstanding concerns relating to materials, impact on neighbours, public realm and wider connectivity.

Architecture, height and massing

35 The overall layout and massing principles are supported, as they respond well to the existing scale of the stadium and also introduce an enhanced sequence of public realm, as well as new points of access, along the base of the proposed stand. The simple building form is supported, including the height of the brick plinth to respond to neighbouring properties and the arched form of the top of the stand, and should other stands come forward for development in the future, it would enable the elliptical shape to continue. Notwithstanding this, the applicant must continue to engage with Croydon Council on the detailing of the facade and the materials to ensure the highest possible built quality. In addition, the applicant must demonstrate that the level of glazing will not result in overheating.

36 The scale broadly follows that of the existing stadium, with the height stepping down to meet the scale of the existing stands on either end; this approach ensures that the junctions of the existing stands and the proposed Main Stand create a cohesive design overall, rather than resulting in stark contrasts in scale. The applicant has provided CGI views of the scheme from the surrounding streets, as discussed at pre-application stage and the impact of the bulk and massing does not raise any strategic concerns, subject to addressing outstanding issues contained within this report.

37 The applicant's daylight/sunlight assessment states that there are some negative impacts on a retained property on Wooderson Close; the applicant must provide the extent and locations of reduced ADF levels in this unit to ensure that the living standards are not compromised. The draft London Plan introduces Policy D12 on the agent of change, which places the onus on a proposed development to mitigate against adverse effects on the surrounding noise-sensitive developments; therefore, in this instance, it is the applicant's responsibility to ensure impacts are minimised on the surrounding homes. The applicant must therefore confirm that the remaining terraced homes on Wooderson Close can remain occupied whilst the 6 homes are demolished and appropriate mitigation measures for the remaining residents, including any necessary interim agreements, must be appropriately secured.

Public realm and connectivity

38 The applicant must ensure that both the entrance from Whitehorse Lane and the entrance from Holmesdale Road are suitably demarcated and of a high quality architectural design. The applicant must ensure that safety measures including Hostile Vehicle Mitigation are sensitively designed and integrated in the public realm. Furthermore, the proposals present an opportunity to generate wider regenerative benefits for the surrounding area (Selhurst, Thornton Heath and South Norwood district centres); as discussed above, the applicant must fully explore options for wider public benefits with both GLA and Council officers.

39 The width of the pavement along the stand's frontage must be sufficient to accommodate the safe movement of pedestrians at all times, including match days. The new public realm off Holmesdale Road is welcomed as it will provide a transition space and will manage crowd flows; however, in addition to this, the applicant must consider how the proposals relate to the public realm more widely, including routes to and from the surrounding train stations and, as discussed above, how the proposals can enhance these routes.

40 The applicant must explore options to consolidate the club's parking, which is presently proposed at the base of the new stand and within the Sainsbury's site. It is understood that discussions with Sainsbury's are on-going it is suggested that a more generous pedestrianised public realm zone opposite the general admission cores and club lounge is provided.

Energy

41 The applicant has broadly followed the energy hierarchy; however, further information is required before the proposals can be considered compliant with London Plan Policy 5.9 and draft London Plan Policy S12. In terms of 'be lean', the applicant must demonstrate how solar gains from the significant glazing will be managed, cooling information is required, an overheating analysis is required and full BRUKL reports must be provided. With regard to 'be clean', the applicant has demonstrated that a Combined Heat and Power Network is not suitable. On the 'be green' element of the hierarchy, the applicant must provide further details on the proposed heat network and must undertake the proposed further investigations on the locations of the PV panels.

42 As presently proposed, the scheme will achieve an overall saving of 15%; this does not meet the target set out in London Plan Policy 5.2 and draft London Plan Policy S12. The applicant must consider the scope for further measures to reduce carbon emissions, including investigating the feasibility of PV panels. Following the resolution of the outstanding energy issues, any shortfall in carbon savings should be offset through financial contributions to the Council's carbon offset funds. The detailed technical comments have been sent to the applicant and the Council.

Transport

Site access

43 It is proposed to retain the existing vehicle and pedestrian access points, with amendments to the Holmesdale Road opening, internal road layout and car parking spaces rearranged due to the extension and proposed public realm improvements. The design of all external spaces must follow the healthy streets approach set out in Policy T2 of the draft London Plan.

Transport Assessment

44 Whilst TfL officers are satisfied with the trip generation data provided for the match day and non-match days, further information is required on other events, including conferences held at the site, in accordance with TfL's Transport Assessment guidance and Policy T6 of the draft London Plan. In the absence of information on other events, including European level matches, TfL recommends that a cap is secured against the number of alternative events that could be held at the stadium to control potential impact. In addition, further information is required on the conference use and proposed location of the Palace for Life Foundation.

Healthy Streets

45 A PERS audit has been undertaken, which identified potential highway improvements and signage to and from the site; however, further information is required to understand how the 'next match' will be advertised on the streets surrounding the site. Once further information has been provided, the nature, location and costs of these advertisements must be agreed with the Council and secured and funded through the S106 agreement to further encourage sustainable travel, in line with London Plan Policy 6.10 and draft London Plan Policy T2.

46 To ensure that any barriers to walking to the site are removed, the applicant must provide a Pedestrian Comfort Level Assessment (PCL) to fully understand routes to and from the site on match days. Furthermore, to encourage sustainable travel by bicycle, a Cycling Level of Service (CLOs) assessment must be undertaken, which should review all cycle routes to and from the site and identify improvements. The improvements must then be agreed with the Council and secured through a S106 or, where relevant, a S278 agreement.

Car parking

47 The club's car park will provide 126 spaces, with a further 353 available on match days and located within the Sainsbury's car park. The total provision includes 28 Blue Badge spaces, two active and 20 passive Electric Vehicle Charging Points (EVCP). On match days, however, it is proposed that the club car park will operate at a reduced capacity to enable some space to be used for the 'Fan Plaza'; as such, all spaces in club car park will be restricted to broadcasters, players, managers and VVIPs. The number of car parking spaces must be further reduced, in accordance with London Plan Policy 6.13 and draft London Plan Policy T2, Policy T5 and Policy T6, in recognition of the Healthy Streets approach, mode share and active travel targets as well as the aims to improve public transport reliability, reduce congestion and reduce traffic. Furthermore, reducing the car parking will enhance the public realm surrounding the main stand. Whilst the provision of EVCP car parking spaces is welcomed, the provision should be increased in line with employment parking standards set out in London Plan Policy 6.13.

48 Junctions surrounding the site are currently over capacity, which reinforces the need to reduce car parking and focus on other modes of transport. Car parking spaces should be reduced, with operational spaces kept to a minimum to discourage car usage. The existing match-day Controlled Parking Zone (CPZ) should be extended in agreement with the Council; this must be secured within any S106.

49 At present, car parking spaces are on a 'first come, first serve' basis, which is not considered to be an appropriate way to manage the car park. The applicant should manage, charge and allocate all parking spaces in advance as part of a Car Parking Management Plan, which would be secured by condition and linked to the Travel Plan. Extending the CPZ will also discourage further car trips.

Coach parking

50 Coaches currently park on the street and there is no formal management strategy in place. Whilst this is considered acceptable for away-team coaches, the applicant must provide designated home team coach and minibus parking on the site. It is considered that space for coach and minibus parking could be made available through reducing the car parking, as discussed above. In addition, any offsite car parks that could be made available for coach parking should be investigated and secured through the plan.

Cycle parking

51 It is proposed to provide 200 cycle parking spaces outside on the corner of Holmesdale Road and the internal service road. The cycle parking provision has been calculated based on demand for that mode of transport; however, there are currently no cycle parking spaces provided on the site. As no cycle parking spaces exist, it is difficult to infer staff or supporters desire to cycle to the site; as such, further information is required on the level of parking spaces provided. The proposed cycle parking spaces will be for the whole stadium, yet will all be located on the corner of Holmesdale road; the applicant should consider alternative areas to house cycle parking around each stand and ensure that cycle parking will not conflict with pedestrian routes and desire lines. Whilst the cycle parking provision is appropriate for the short stay spaces, long stay provision should be provided for employees, with lockers and showers, in accordance with London Plan Policy 6.13 and draft London Plan Policy T5.

52 Furthermore, review mechanisms are required to be secured and funded through the Travel Plan, with additional parking spaces provided if required, in line with London Plan Policy 6.9 and draft London Plan Policy T5.

Rail

53 Norwood Junction, Selhurst and Thornton Heath stations are all used by supporters to get to the site; however, Thornton Heath is the only station with full step free access to all platforms. Improvements to Norwood Junction are being considered as part of the upgrade of the Brighton Mainline Upgrade; a minimum contribution of £100,000 towards these improvements is required. Supporting the upgrading of Thornton Heath station would improve travel options for fans who have a disability as well as encouraging sustainable modes of transport, in accordance with London Plan Policy 6.7 and draft London Plan Policy T3.

54 The existing match day management and controls for all stations should be reviewed and potential improvements agreed with the relevant operators; this must then be secured and funded within any S106.

Taxi and private hire

55 As a result of the increased hospitality offer on the site, the number of taxi and private hire tri[ps] will increase. At present the drop off / pick up is from surrounding roads; however, the applicant has provided no details on where this will take place once the stadium is extended and this information must be provided. To ensure that the designated drop off / pick up location is appropriate, the applicant should engage with private hire vehicle companies to agree a location which can be programmed into relevant apps to further ease congestion.

Travel Planning

56 The submitted Travel Plan must be significantly strengthened to encourage sustainable modes of transport for employees, fans and visitors and reduce car dependency, with estimated costs stated for each measure. The Travel Plan should be developed in consultation with TfL, the Council and the Metropolitan Police. Once a final Travel Plan has been agreed, it must be secured, delivered and monitored through the S106 agreement.

Construction, Delivery and Servicing

57 The Construction Logistics Plan must be revised to provide more detail, in line with TfL guidance and secured by condition. In order to minimise the impact of delivery vehicles, a Delivery and Servicing Plan must be provided, in accordance with London Plan Policy 6.14 and draft London Plan Policy T7; this must also be secured by condition.

Community Infrastructure Levy

58 In accordance with London Plan Policy 8.3 and draft London Plan Policy T4, a contribution to Mayoral CIL must be secured; the level required should be confirmed by the applicant and Council once the components of the development have been finalised. The full transport comments have been sent to the applicant and the Council.

Local planning authority's position

59 Croydon Council Planning Officers are reviewing the scheme and a committee date has not yet been scheduled.

Legal considerations

60 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. 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.

Conclusion

61 London Plan and draft London Plan policies on housing, affordable housing, sports stadia, urban design, inclusive access, energy and transport are relevant to this application. The proposals do not comply with the London Plan and draft London Plan. The following changes, however, might lead to the application becoming compliant:

- **Principle of development:** The principle of quantitative and qualitative improvements to the Main Stand are supported, subject to securing an adequate strategy for the re-provision of homes and relocation of tenants, provision of community facilities within the enlarged Main Stand and wider regenerative benefits for the surrounding area.

- **Loss of housing:** It is proposed to demolish 6 existing homes to accommodate the proposed Main Stand; 5 of these homes are confirmed to be existing affordable properties. The applicant must confirm the ownership of unit 6 as a priority. The lack of strategy for the re-provision of these homes and the rehousing of the existing tenants is unacceptable; the strategy should have been far more advanced on submission of any planning application to ensure clarity for the Mayor, the Council and the residents. GLA officers will continue to engage with the applicant on this as a priority, noting that draft London Plan Policy H10 and London Plan Policy 3.14 require no net loss of housing, in both the affordable and market tenures. The housing strategy must be agreed prior to the determination of the application and appropriately linked to the stadium's construction and occupation.
- **Sports stadia:** The principle of the extension of the Main Stand is supported, as it will enhance CPFC's facilities, enable more fans to visit and will ensure the club remain in this part of Croydon; however, this is subject to confirming and securing a suitable housing strategy, securing appropriate community uses and ensuring wider regenerative community benefits.
- **Urban design:** The applicant must: provide further details of the facade and materials; demonstrate that the amenity of residents of Wooderson Close will not be compromised, in accordance with draft London Plan Policy D12; and provide further details on public realm, connectivity and wider regeneration.
- **Energy:** Further information is required on: 'be lean' energy efficiency savings, including demonstrating that the glazed facade will not cause overheating; the proposed heat network; and evidence that renewables have been maximised. The scheme does not yet comply with London Plan Policy 5.9 and draft London Plan Policy S12; therefore, further measures must be included to reduce carbon emissions.
- **Transport:** The applicant must seek to reduce the car parking, given local junction capacity and congestion as well as to encourage sustainable transport modes. The Travel Plan must be strengthened and secured through any S106, including all associated funding. Further information is required on: other events that will take place; pedestrian routes; cycle parking; car parking management; coach parking; taxi drop off and pick up; and construction, delivery and servicing. Financial contributions towards step-free access at Norwood Junction and expanding the local CPZ are required.

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