

## Ruskin Square

in the London Borough of Croydon

planning application no. 11/00631/P

### Strategic planning application stage 1 referral (new powers)

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

### The proposal

The applicant proposes the total redevelopment of a brownfield site adjacent East Croydon Station. This is an outline application with a series of parameter plans and a detailed development specification that sets out the quantum of development for the various land uses.

The application proposes; a range of commercial space of between 88,855 sqm. and 151,420 sqm; a range of residential units between 550 and 625; a series of public and private amenity spaces; 256 car parking spaces with associated servicing space. Building heights range between 4 and 22-storeys for the residential buildings; and 9 and 16 storeys for the commercial buildings.

### The applicant

The applicant is **Stanhope and Schroder** and the architect is **Foster + Partners**.

### Strategic issues

This is a vacant brownfield site within the Croydon Opportunity Area for which an Opportunity Area Planning Framework is currently being prepared. The site has been vacant for a number of years. Its redevelopment to include a mix of uses such as housing, commercial, retail, and community and amenity space is acceptable in strategic planning policy terms and would help the redevelopment of the town centre.

However, there are a number of details that need to be addressed in more detail before this application can be considered acceptable. These include; some detailed design issues; the affordable housing offer and tenure split; the housing mix; the transport strategy, and the energy strategy.

### 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 123 of this report; but that the possible remedies set out in paragraph 125 of this report could address these deficiencies.

## Context

1 On 17 March 2011 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 27 April 2011 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 Notwithstanding the requirements of the order, on 4 April 2011 Croydon Council and the applicant agreed to an extension in the 6 week timeframe and it was agreed that comments would be provided on 4 May 2011.

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

- *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *"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 outside Central London and with a total floorspace of more than 15,000 square metres."*
- *"Development which comprises or includes the erection of a building of one or more of the following descriptions the building is more than 30 metres high and is outside the City of London."*
- *"Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use."*

4 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.

5 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

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

## Site description

7 The application site is located on the eastern edge of the Croydon Metropolitan Centre and is a total of 3.59 hectares in size. The site is currently vacant and has been cleared for a number of years. The only building on-site is the Warehouse theatre and bar, located at the junction of Dingwall Road and George Street. The applicant proposes to relocate the theatre elsewhere within the final scheme, which is supported.

8 The site is bound by East Croydon station and train line to the east, and there are plans to build a new footbridge over the train line to improve east/west connections across this site. To the west, the site is bound by Dingwall Road, which houses a number of 1960's office buildings with varying levels of occupation and design quality as well as some vacant plots. To the south, the site

is bound by George Street, which houses a mix of office, education and retail space and the Croydon tram line and tram station. George Street currently provides the only access point into East Croydon Station. To the north, the application site is separated into two areas by Lansdowne Road, which runs on an east/west axis through the site. Further north the area has residential, commercial and car parking space.



*Plan 1: Site location*

9 Croydon Council controls the roads in the immediate vicinity of the site. The nearest Transport for London Road Network is the A232 Fairfield Road, which is approximately 350-metres to the south of the site. The A212 Wellesley Road, which forms part of the Strategic Road Network is also located approximately 350 metres west of the site. The site is immediately adjacent East Croydon station and transport interchange, which offers frequent and direct rail services to central London and south east England, as well as taxis, tram and bus services. As such, the site records an excellent public transport accessibility level of 6b, out of a range of 1 to 6.

## **Details of the proposal**

10 This is an outline planning application (reserving details of layout, scale, appearance, means of access and landscaping) for a minimum floorspace of 152,670 sqm and a maximum floorspace of 242,150 sqm comprising:

- Five buildings with a minimum floor area of 53,880 sqm and maximum of 62,080 sqm to provide a minimum of 550 and a maximum of 625 residential units;
- Six office buildings for a minimum of 88,855 sqm and a maximum of 151,420 sqm
- The provision of a minimum of 7,285 sqm and a maximum 10,900 sqm of retail
- The provision of a maximum of 400 sqm of Community use
- Provision of a replacement theatre of 200 seats
- Provision of energy centre and estate management facilities
- The provision of public open space and pedestrian routes
- New vehicular access points into the site

- Car parking not to exceed 256 spaces

11 The application proposes two new pedestrian routes across the site, including; a new north/south route connecting Lansdowne Road to George Street called Ruskin Walk; and a new east/west route, connecting Lansdowne Road with the new footbridge over the train line. This east/west route divides the site into two separate areas. The design for the northern site is being led on by HMAA architects and is focussed on residential, while the southern site is being led by Fosters + Partners architects and is primarily commercial.

12 The southern commercial area includes six new buildings (blocks 1 to 6) providing office, retail, leisure and servicing space. Blocks 1 to 4 are located along Dingwall Road and blocks 5 and 6 are located along the train line.

13 The northern area is largely residential with two new buildings separated by a new public amenity space and Ruskin Walk. The buildings include retail and community space at ground levels with residential and private amenity space above.

14 The scheme also includes a range of car and cycle parking and associated servicing space.

## Case history

15 In 2002 an application for full planning permission was submitted on behalf of Arrowcroft Ltd. The application proposed the demolition of existing buildings and the erection of commercial buildings of a total gross floorspace of 57,800m<sup>2</sup> to include retail (including food-store), restaurants, leisure, nightclub, health and fitness and station ticket/concourse buildings, a 12,500 seat arena of 21,043m<sup>2</sup> gross floorspace, 834 flats including a 165 metres in height, 1286 parking spaces. In 2005, the Council was minded to approve the application; however, it was 'called in' by the Secretary of State and was dismissed. A subsequent appeal was also dismissed.

16 In November 2004 an application was submitted on behalf of Croydon Gateway LP for 9 new buildings (of 10 – 32 storeys); comprised of 4 new office buildings, a 26 storey gateway tower adjacent to East Croydon Station, 560 residential flats, restaurant and café uses, health and fitness club, a replacement of a 200 seat theatre, public realm and associated landscaping and parking landscaped public realm including a winter garden and associated parking. An appeal was submitted against the Council's failure to determine application and following an inquiry the scheme was allowed on appeal in June 2006.

17 In the last year, there have been two pre-application meetings held between the applicant and the Greater London Authority. Officers from Croydon Council also attended these meetings. The meetings were held on 16 September 2010 and 20 December 2010. At these pre-application meetings the following issues were discussed in detail; housing delivery, family housing, affordable housing, design, building heights, access energy and climate change, transport and parking.

## Strategic planning issues and relevant policies and guidance

18 The relevant issues and corresponding policies are as follows:

- Land use principle *London Plan, PPG13, PPS4*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Urban design *London Plan; PPS1*

- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13;*
- Energy and climate change *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*

19 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 2006 Croydon Council Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

20 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- Croydon Council preferred options Core Strategy.
- Croydon Council East Croydon Masterplan – adopted as interim planning guidance 2011
- A Croydon Town Centre Opportunity Area Planning Framework (OAPF) is currently being prepared by Croydon Council and the Greater London Authority. No formal public consultation has taken place.

## **Land use principle**

### Opportunity area

21 In line with the London Plan's desire to further develop London's world city status, London Plan policies 2A.5 and 5E.2 identify Croydon as an Opportunity Area with the capacity to provide 5,500 new jobs and a minimum of 2,700 new homes by 2026. The draft replacement London Plan (2009) increases these figures to 10,000 new homes with an indicative employment capacity of 7,500 new jobs by 2031. Based on these London Plan housing figures, the Croydon Council preferred options Core Strategy (September 2010) proposes a housing figure of 8,000 new homes in the Town Centre, and this figure is based on local evidence that is still under review.

22 In addition, London Plan policy recognises Croydon as London's largest Metropolitan Centre and is one of the capital's two strategic office centres outside of the Central Activities Zone.

23 The Mayor, GLA, TfL and LDA are working closely with Croydon Council to prepare an Opportunity Area Planning Framework (OAPF) for the Croydon Metropolitan Town Centre, and work on this plan has already begun. It is expected that a draft OAPF will be ready for initial consultation in late 2011. This planning framework will seek to optimise planning and design outputs from new development in the Town Centre, whilst at the same time ensuring deliverability. The preparation of this framework is on-going and the applicant should continue to work closely with both Croydon Council and the GLA family to ensure cohesion between the framework and the emerging plans for this site.

24 Croydon Council has now adopted an East Croydon masterplan for the area around East Croydon station, and the GLA family have been involved in this work, with TfL sitting on the board. This joined up working between the applicant, the Council, TfL and the East Croydon masterplan stakeholder group is strongly supported and should increase certainty in the planning process.

25 Within this policy context, the proposed mix of commercial (office, retail, leisure, community) and residential is supported.

#### Retail impact

26 The application proposes a range of retail space, starting at a lower threshold of 7,285 sqm. and up to 10,900 sqm.

27 The site is located circa 200 metres to the east of the primary shopping area as defined in the Council's adopted UDP and circa 400 metres from the primary shopping frontage on the corner of North End Road and George Street. In line with PPS 4, the applicant has carried out a retail impact assessment. The report is acceptable and concludes that there would be a negligible impact on the existing retail area. In addition;

- Previous planning permission, granted in 2006, already establishes the principle of new retail floorspace on this site. The 2006 permission permitted 4,800 sqm.
- This application site is a significant brownfield site within the Croydon Opportunity Area and Metropolitan Town Centre that would make a positive contribution to the role of Croydon as a town centre.
- The provision of ground level retail space on this site, adjacent East Croydon station, would help regenerate this area and make a positive contribution to this key entry/exit site to the centre.
- The proposed level of retail space is also in line with Croydon Council's masterplan for East Croydon, which has now undergone a public consultation event and has been adopted as interim planning guidance.

## **Housing**

28 The application proposes a range of housing numbers, from 550 to 625 units. The exact quantum of housing would be determined at the detailed design stage.

#### Affordable housing

29 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

30 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified

31 Where borough councils have not yet set overall targets as required by Policy 3A.9, they should have regard to the overall London Plan targets. It may be appropriate to consider emerging

policies, but the weight that can be attached to these will depend on the extent to which they have been consulted on or tested by public examination.

32 A detailed financial appraisal has been submitted to the Council. The appraisal examines; sales values, construction costs, returns, fees, contingency, land cost, comparables and the current market. The report concludes that the scheme is unable to provide any affordable housing. The appraisal includes only limited detail about the possible availability of affordable housing grant, and this needs to be addressed in more detail.

33 Croydon Council has already appointed an independent consultant to carry out a detailed review of this appraisal. An initial review has been carried out and the report concludes that the application cannot afford to make an affordable housing contribution.

34 Discussions are still underway between all parties, however, no firm level of affordable housing has been proposed. A meeting is required to address this issue in more detail. The potential to include a review mechanism as part of the final affordable housing offer should be further investigated.

#### Housing grant

35 The availability of affordable housing grant funding is no longer a certainty. The applicant should consider the impact of not securing grant funding on the delivery of affordable housing on this scheme.

#### Tenure split

36 The final tenure split is still under discussion and will need to be agreed as part of on-going affordable housing discussions.

#### Housing mix

37 The development specification includes a housing mix;

- 10%: Studio
- 30%: 1 bed
- 30%: 2 bed (small)
- 28%: 2 bed (large)
- 2%: 3 bed

38 The proposed number of studio units is high. However, London Plan policy 3.5 does not preclude the development of single person homes of less than 50 sqm. but makes it clear that this should only be in cases where there is a clear local need and where the units achieve an exemplary design standard. In the case of the Croydon Town Centre there is a clear local need for a proportion of smaller single person dwellings, this is due to the commercial nature of the town centre, its good access to the central London market, and the high provision of larger family housing immediately surrounding the town centre.

39 While the principle of providing 10% studio units on site; can be accepted in this instance, the applicant has not demonstrated how the proposed studio 'single person' dwellings would achieve an exemplary design standard. As per the Mayor's Housing Design Guide, the applicant must provide further detail showing how the design standards would be achieved, including indicative flat outs. This should be secured through the development specification or design code. A further discussion on this is required.

40 The Mayor has published his statutory Housing Strategy. Policy 1.1C of this strategy identifies a demand for more family sized homes in London, particularly affordable homes. The policy states that 42% of social rented homes and 16% of intermediate homes should be three bed housing. In this regard, the proposed level of 3 bed units for this application at 2% is low. The applicant should confirm how many of these 3-bed units would be provided as affordable housing. The overall level of 3-bed family accommodation should be increased.

41 The proposal does include a 28% provision of larger 2 bed units. The applicant should confirm that these units are in fact 2-bed, 4-person units. In the case of Croydon Town Centre, this type of unit could provide some of the town centre's family housing need. However, a further discussion on this issue is required before it can be considered to be acceptable.

#### Residential design standards

42 The application includes a range of unit types. The proposed sizes accord with the residential space standards in table 3.3 of the draft replacement London Plan, which is acceptable;

- 1 Bed 2 person: 50 sq m
- 2 Bed 3 person: 61 sq m
- 2 Bed 4 person: 70 sq m
- 3 Bed 4 person: 74 sq m

43 The design code also includes a requirement to provide balconies for each of the residential units, and these would be sized in accordance with the Mayor's Housing Design Guide, which is acceptable.

44 However, there is limited other information about the final design of the residential, which raises a concern. The applicant must demonstrate how and the proposed units would meet the Mayor's Housing Design Guide standards and these measures should be secured as part of the design code. Currently there is limited information provided, which does not allow a detailed understanding as to the quality of the proposed units. Indicative flat layouts should be provided and included as part of the design code. This issue needs to be addressed.

45 The design code states that residential block 1 would have single aspect units facing directly over the train line. These units would be sealed with internal ventilation and heat recovery to address the noise impacts from the train line. This approach is disappointing and the applicant should aim to increase the number of dual aspect units. This would require a rethink of the internal layout for block 1.

#### Residential density

46 The application site is 3.59 hectares with a potential range of units from 550 to 625. This equates to a residential density of between 153 and 174 units per hectares. However, this is a mixed use site, where the residential and the commercial spaces are clearly separated into two parts. To allow a residential density to be calculated, the applicant should provide detail on the size of the residential part of the site. This issue will need to be addressed before the application is returned to Mayor.



## Urban design

47 The general design approach, the layout of the buildings, spaces and routes is broadly in line with the East Croydon masterplan guidance, as adopted by Croydon Council. This masterplan has been prepared collaboratively between the Council, landowners, stakeholders and TfL with involvement from the GLA. However, there are some detailed aspects of the scheme that could benefit from some further work and consideration, and further comments on these areas are set out below.

### New east/west route and footbridge

48 The provision of a new east/west connection across the site from the new footbridge to Dingwall Road is welcomed, and the joint work between the applicant, the Council and Network Rail is commended. Planning permission for this new bridge has been secured and its detailed design is underway.

49 It is important that a legal agreement for this application secures a publicly accessible route across the site, to allow a connection from Dingwall Road to the new bridge before this site is fully built out. Further detail on the management and treatment of this route should be secured through this application.



### Ruskin Walk

50 This new route provides a clear connection between George Street in the south and Lansdowne Road in the north. The general approach of providing a route with a series of connected spaces along it is supported. The width and level changes have been presented in more detail and it is now clear that the route would only be enclosed by tall buildings for short sections of the walk and would have a more open feeling for a good portion of the route, which is acceptable.

51 Ruskin Walk is approximately 500 metres long and would be lined with retail units. The majority of these retail units would be closed at night time, and the office space above would also be empty at nighttime. As such, there is a concern that there may be limited activity along the edge of the building at nighttime. Whilst the area has been designed as a permeable space that would attract some degree of footfall throughout the area at nighttime the applicant is required to provide further detail showing how the space would operate at nighttime and how the treatment and management of the area would ensure safety after dark.

### Dingwall Road

52 Along Dingwall Road the scheme proposes four new office buildings that add to the commercial character of the street. The design code provides further detail about the treatment of

the elevation of these commercial blocks, which seeks a 'familial approach' to the treatment, which is acceptable.

53 There is still a need to further consider the potential introduction of additional bus stops, stands and taxi ranks along Dingwall Road, which is an option currently being considered by TfL and the Council and further discussion on this is required.

#### Public amenity spaces

54 The scheme includes a series of new public amenity spaces spread across the site. The spaces vary in size, proportion and definition and will offer users with choice, which is welcomed.

55 Lansdowne Square (located at the base on the new footbridge) - this space has the potential to be heavily traversed with movement to and from the bridge. It is expected that this space would be one of the key new focal spaces within the site. The space is well proportioned and scaled, with active uses surrounding it. The design code begins to set out the character of this area. However, further detail should be provided on the boundary treatment between the square and the rail line.

56 Station Square (adjacent East Croydon station) - the space will act as a focal point for this part of the town centre. The space would have people spilling out into it from the station concourse and will be a busy arrival point. The design code provides further detail on the character of this space. It is disappointing that this space is not larger in size, thereby helping to create a greater sense of arrival.

57 Ruskin Square (located between office blocks 2 and 3) - the space provides a connection between Ruskin Walk and Dingwall Road. Croydon Council is keen to secure a new route between Dingwall Road and Wellesley Road in the future, and so Ruskin Square could tie in well with this new route in the future. The space also offers relief in the building line along Dingwall Road. However, given its location the space will be less well used than the other key public spaces, and it is important that the space is adequately managed and maintained throughout the day.

58 Ruskin Walk amenity space (located between residential blocks 2 and 3) - includes a public amenity space between two residential block that provides a space for residents and the public, which is welcomed.

59 The burden of delivering these amenity spaces will be shared across the various phases. The applicant should explain what would happen in these spaces between the delivery of phases to ensure that these spaces can be used before the full scheme is built out. This should be secured by a space management plan and through the design code, which is not clear at this stage.

#### Private amenity spaces

60 The provision of a residential courtyard space in phase 1 is welcomed. The courtyard is 20-metres wide and while it is a north facing U shaped courtyard, the building to the south of the courtyard would only be up to 2-storeys in height and so there would be a good level of sunshine during the day. The layout and design of the courtyard is acceptable.

61 The development specification indicates that approximately 1,000 sqm. of amenity space would be provided on the site to the north of Lansdowne Road. It is unclear where this quantum of amenity space would be provided. The space in between the two residential blocks is largely provided as a car parking space. Given the high density nature of this development and the limited provision of private/communal residential amenity space within the scheme and in the surrounding

area, it is very disappointing that this space is not provided as a meaningful amenity space. This issue should be addressed before this application is returned to the Mayor.

62 The applicant has indicated that roof space would be made available as residential amenity space, which is welcomed. However, additional detail on the design of this roof space is required.

63 Balconies are provided for each residential unit, with a minimum size of 5 sqm. for a one bed unit up to 7 sqm. for a three bed unit.

#### Building height and form

64 The building heights range from 4 to 22-storeys. In general the proposed heights accord with existing building heights in the immediate area and across the Croydon town centre. The applicant has also carried out a detailed visual impact assessment of the proposed heights from the surrounding area, which shows the impact of the bulk and scale of the scheme. In the views provided, the height and scale of the proposed buildings have less of a visual impact than the 2006 permitted scheme.

65 For the commercial space the application proposes a range of office heights from 9 to 16 storeys. The design code and development specification set the location of the commercial buildings within the site, and also sets their heights i.e. a taller commercial building in one location would result in a shorter commercial building in another location. However, the final height and size and detail of the floorplates would be determined by the end occupier.

66 For the residential component, the buildings range in height from 4 to 22-storeys approximately. The taller residential elements have been located in the most prominent locations to mark views and the entrance to the new footbridge. The approach is supported. Similarly to the commercial buildings the location and heights of these buildings are set through the design code and development specification, which is acceptable.

67 However, there is limited information provided on the final design treatment and visuals for the taller buildings. This does raise a concern and this is expanded on in paragraph 70 and 71.

#### Play space

68 Policy 3D.13 of the London Plan sets out that *"the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs."* The Mayor's supplementary planning guidance *'Providing for Children and Young People's Play and Informal Recreation'* includes a methodology that anticipates the number of children that could potentially live in developments. At this stage the applicant has not provided a detailed schedule of accommodation and so the potential number of children cannot be predicted. However, the SPG sets a benchmark of 10 sq.m. of useable child playspace to be provided per child. This space should be provided as a range of different spaces to accommodate the varying needs of all children up to the age of 16.

69 As the final housing breakdown has not been agreed, the final population make up and number of children cannot yet be determined. This will need to be addressed in greater detail. The applicant must demonstrate on plan that sufficient space can be provided to accommodate the play needs of the children living within this scheme. This issue has not yet been addressed.

### Design code and development specification

70 The design code is welcomed, and the local planning authority should secure the proposed design code and development specification by an appropriate planning condition. However, there are aspects of the code that need further detail. This detail needs to be secured to provide certainty to the Mayor that the proposed approach achieves a suitable quality of design.

71 For the taller residential buildings, the design code includes some detail about the need to break down the mass, express the base of the buildings, materials, and expression of the balconies. However, this is limited for the taller buildings, and further detail would be expected. The applicant should demonstrate what the application of these design code principles would result in for the treatment of the residential buildings. This could be indicative, but should be included as an indicative drawing within the design code.

72 For the commercial buildings, the design code does include detail about the treatment of the elevations, which is welcomed, but again these principles should be shown in an indicative visual that could then be included in the design code.

### **Access**

73 Previously the main concern was the level changes along the main Ruskin Walk and the connection into Ruskin Square. The applicant has reduced the impact of this level change. The height of the steps at the centre of the scheme has been reduced by 1 metre which would help to reduce the feeling of a barrier in the centre of the main walkway. This advancement is welcomed.

74 The applicant should provide further design detail on the treatment of the steps and the associated lifts. Currently the scheme only includes one lift at this location, which is disappointing. It is strongly recommended that two lifts be secured in this location, in a similar manner to what has been proposed for the base of the steps in the Cherry Orchard Road scheme.

### Residential

75 The applicant has indicated that 100% of units would be designed to meet 'Lifetime Homes' standards and that 10% of units are provided as wheelchair accessible units. These requirements should be secured by condition.

### Blue badge car parking

76 In line with London Plan policy the provision of a wheelchair accessible unit should be accompanied with a blue badge car parking bay. A policy compliant scheme would range between 55 and 62 spaces, dependent on the final agreed quantum of residential. However, this is a highly accessible location with direct access to an accessible train station; a lower level of accessible car parking may be acceptable.

77 However, the applicant should clarify what level of residential accessible car parking is proposed and this should be shown on plan.

### **Transport**

#### Car Parking

78 As discussed at pre-application stage, TfL would have expected a car free development in recognition of the site's excellent accessibility. Whilst the low level of residential parking provision (0.06 spaces per unit) is supported, the 216 spaces proposed for the commercial element still

remains a concern, despite being in line with the London Plan standards, given the congested nature of the transport network. Allowing such a provision on site will also raise the risk of setting an undesirable precedent for redevelopment sites within the town centre.

79 The applicant had previously agreed that this level of commercial provision will only be used where it is contingent on securing an occupier. It was subsequently informed at pre-application stage that the wording for a legal agreement would be prepared that prohibited the development to be marketed as providing parking facilities. This agreement was intended to also control how parking could be provided as the development progress. The applicant was advised that while it was not the objective to stifle the development of this site, TfL would require to be consulted on the wording of the legal undertaking before confirming that such provision is acceptable. This is still outstanding and as such, the drafting needs to be provided to TfL urgently.

80 In addition, TfL requests that the commercial parking provision be expressed as a maximum parking ratio rather than number of spaces. This will ensure that, should a lower amount of floorspace be provided than permitted or only part of the floorspace requires parking, quantum of provision will remain in line with this initial agreement.

81 TfL also requires that occupiers of the residential units be restricted from applying for parking permits in the surrounding Controlled Parking Zone (CPZ).

82 The provision of electric vehicle charging points, in accordance with consultation draft replacement London Plan policy 6.13 'Parking', dedicated blue badge and car club spaces are all welcomed.

#### Trip Generation and Traffic Impact

83 TfL is concerned that the trip generation currently presented does not represent the worst case scenario and is therefore not considered robust enough to be acceptable. This assessment needs therefore to be revised, assuming all retail floorspace to be A1 retail use. Alternatively, in the absence of this revised assessment, TfL will request that the split of uses assumed in the report (i.e. 10% food retail, 30% non-food retail and 60% restaurant/pub) be fixed and secured by way of planning conditions.

84 In addition, no detail has been provided on potential unit size and given that this would also impact on the assumptions made with regard to linked trips and modal split, TfL would therefore expect this to be addressed.

85 Residential population has been used as a basis for modal split for all land uses. Given that the majority of trips will be generated by the B1 use, TfL recommends that daytime population census data should be used to derive the mode split for this specific use. Initial assessment would however suggest that this methodology is expected to result in a higher car driver and bus mode share than the ones presented in the report.

86 Furthermore, car mode share for the non-residential uses has been reduced to a low level due to the limited level of car parking provided as part of the scheme. Whilst it is accepted that the development proposes a relatively lower parking provision than would be found at most other office developments in central Croydon, the opportunity remains for workers in the development to drive and park in nearby facilities, such as at the adjacent NCP car park on Lansdowne Road. As such, TfL considers that the car driver mode share currently appears too low and should be increased.

87 As required during pre-application discussions, although the use of turning counts carried out in 2006 for assessing the highway impact has been justified through comparison with

Automatic Traffic Count carried out in 2007 and 2010 which show decrease in traffic volume, these have not however been related to the 2006 initial counts. This comparison should therefore be carried out before TfL can confirm its acceptability. Further comments on highway impact will be provided by TfL in due course once the above issues surrounding the trip generation have been resolved.

88 It is also worth mentioning at this stage in relation to the development traffic impact that there will be some increase in movements along the tracks south of the development, assuming extra trams are secured, which will add a little to the time when other traffic must stop to let the tram pass. This will therefore need to be taken into account.

### Public Transport

89 The additional work carried out as part of the submission in relation to bus stops potential locations, as recommended at pre-application stage, is welcomed. However TfL expects discussion to be on-going on this matter to ensure that a satisfactory solution for Dingwall Road as a whole, including the pedestrian crossing location, is secured in accordance with revised draft London Plan policy 6.1 *'Integrating Transport & Development'*.

90 As previously advised, TfL would require clarification from the applicant that any mitigation required on the bus network will be pump primed, through fully funding any necessary improvements, for a period of five years. Whilst it is acknowledged that any such improvements would generate revenue, this would not be sufficient to cover the cost of mitigation without the applicant's significant subsidy. Any mitigation will also need to take into account of subsequent necessary infrastructure to support the forecast growth in the CMC, particularly in the event that no bus standing is to be provided on Dingwall Road.

91 TfL would welcome further discussions over bus mitigation when the issues relating to mode share, as stated above have been resolved. At present, TfL anticipates that the development will generate a significant number of additional bus trips and given the already congested nature of east and west bus services, it is expected that the network would not be able to accommodate these extra trips during the peak periods. It is therefore very likely that TfL will be seeking for mitigation in accordance with London Plan policy 3C.2 *'Matching development to transport capacity'* and revised draft London Plan policy 6.3 *'Assessing effects of development on transport capacity'*. Where bus infrastructure is required, TfL would expect the applicant to fund those through the s106 agreement.

92 The TA identifies that there is a significant amount of reverse commuting to the town centre. As the land use split currently stands, the majority of the trips will be generated by employment on the site and as such, the high proportion of commuting to Croydon is not considered to have a significant impact on train crowding. TfL is therefore satisfied that there will be sufficient capacity to accommodate the additional trips made. However, if the land use split were to change, the impacts of more residential units on train crowding would need to be assessed. No analysis was carried out to assess the development impact on tram line capacity at East Croydon tram stop. This should be addressed and as stated at pre-application stage, TfL is likely to be seeking for s106 funding towards tram service enhancements.

93 The applicant's commitment to land swap with Network Rail along the eastern side of the site, on the edge of the railway line, to deliver an extra platform, as part of the East Croydon masterplan is supported, although understood not to be part of the s106 agreement. TfL is also pleased that the developer is making a contribution towards the East Croydon masterplan proposals, including the new entrance of the station, which will see improved station access to and from the development area. The improvements will also relieve station congestion.

## Taxis & Interchange

94 A feasibility assessment has been provided that assesses the provision of a new taxi rank on Lansdowne Road. A new taxi rank on this side of the site is supported and would provide a connection with the new station foot bridge. The report indicates that the provision of on-street taxi parking spaces may be more appropriate than taxi spaces located in a lay-by. However, there is still a concern about the impact of taxis queuing on Lansdowne Road and the possible impact on the access to the NCP car park. It may be worth considering whether the rank could be part-time. This could avoid peak a conflict with peak hour parking at the car park. However, consideration will need to be given to taxi demand for this and further information is required to address this concern.

## Pedestrians

95 The development will have a positive impact on the pedestrian environment in the area around East Croydon station. This is welcomed in accordance with revised draft London Plan policy 6.10 '*walking*', particularly the opening of a number of new pedestrian links which will address most of the various desire lines in the area. However, there are still some issues that will require specific consideration, as detailed below.

96 The Design and Access Statement makes reference to ensuring that a consistent approach to way-finding is taken across the East Croydon Masterplan area. TfL is currently working with Croydon Council to implement 'Legible London' around the town centre and this should also be implemented within the development site and secured through the s106. TfL can provide further information in this matter.

97 The pedestrian analysis undertaken as part of the Transport Assessment demonstrates that the area around the crossing at the southern end of Dingwall Road will suffer from high levels of pedestrian overcrowding, even when considering the diversion of the some walk trips away from this area as a result of the new pedestrian links. As such the applicant must ensure that the maximum amount of space is made available for pedestrians at this particular location. A wider crossing point may also need to be considered to accommodate the flows. Additionally, step free pedestrian routes within and around the site should be provided.

98 The TA also identifies that the eastern footway on Dingwall Road, immediately outside the site, is narrow for the flows it experiences. This can particularly cause issues at the existing bus stop. Considering the potential relocation of the bus stops in the future to reflect the demand caused by the provision of the new footbridge at the station, TfL requests that the applicant consider the scope for providing additional footway space along the eastern side of Dingwall Road. This request is further justified by TfL's Pedestrian Comfort Analysis which reveals that at least a 3m footway width and up to 6m near the proposed bus stops is required along Dingwall Road.

99 Concerns also remain over the phasing of the opening of the new pedestrian connections through the development site linking the new railway bridge to Dingwall Road. If opened without appropriate and implemented mitigation from the development site, it is likely to lead to safety issues including pedestrians attempting to cross the Dingwall Road / Lansdowne Road roundabout without any formal crossing facility in place. Although improvements to Dingwall Road are outside the applicant's boundaries, in accordance with revised draft London Plan policy 6.10 '*walking*', it seems vital to the success of the new pedestrian bridge that a scheme is brought forward for the safe operation of this link in advance of it being opened. A planning condition should therefore be sought to address this.

100 TfL would also recommend that the need for a pedestrian crossing on Lansdowne Road to serve the future desire line between the new station entrance and the pedestrian access to the northern residential blocks proposed across Lansdowne Road be further investigated.

101 In addition, a stage 1 safety audit will also be required, and should be secured through condition, once arrangements for crossings, taxis bays and bus stops have been finalised.

### Cycling

102 It is understood that cycling will be prohibited within the site, with cyclists being encouraged to dismount before entering the site. Whilst it is accepted that in some locations within the site this might be appropriate, TfL objects to a blanket ban on cycling within the site, particularly as there is a current bid for Croydon to become a 'biking borough', with cycle improvements such as a cycle hub concentrated around East Croydon station, and the adopted East Croydon Masterplan which envisaged the east-west pedestrian bridge being used by cyclists. TfL requests that at as a minimum cycling should be permitted on Lansdowne Walk and Ruskin Walk, although it is accepted that this would comprise a shared use area with priority given to pedestrians.

103 Cycle parking is to be provided in accordance with TfL's cycle parking standards and London Plan Policy, 3C.22. '*Improving Conditions for Cycling*' and draft replacement London Plan policy 6.9, '*Cycling*', which is supported. However, for the larger units it is unclear where the additional cycle spaces would be located and this concern should be addressed.

104 The location of much of the cycle parking remains unclear from the submission and should be clarified. TfL questions how access would be gained to different areas of cycle parking if cycling is limited within the development site. As previously advised, showers and lockers should be provided for all employment uses on site to encourage cycling to work. This should be secured by conditions or within the s106 agreement.

### Travel Planning

105 In order to manage travel demand, and to accord with London Plan policy 3C.23C.2 '*Matching development to transport capacity*' and revised draft London Plan policy 6.3 '*Assessing effects of development on transport capacity*', TfL welcomes the submission of site wide travel plan. Whilst the Travel Plan is generally of a good quality, it was drafted before the publication of TfL's latest guidance. As such it is missing some information which should be provided at this stage. This includes details on how the Travel Plan will be secured, how the development will be phased which may have an effect on interim targets, and the number of anticipated visitors to the development, as at present, only mode share data has been provided. The travel plan should be secured and monitored through the section 106 agreement. The result of the ATTrBuTe assessment is enclosed to this letter.

### Servicing and Construction

106 In order to comply with London Plan policy 3C.25 '*freight*' and draft revised London Plan policy 6.14 '*Freight*' TfL welcomes the submission of delivery and service plan (DSP) and a construction logistics plan (CLP), to be secured by condition.

107 Swept paths showing a 10m vehicle accessing the service area have been submitted as part of the application. As stated at the pre-application stage, there is a concern that, in particular food retail operators, would need to use vehicles that are larger than this. TfL therefore requires that the service access be checked with a 12m vehicle and that a condition be placed on any consent



restricting service vehicles to this size at most. Additionally, vehicle swept path analysis do not show movements in all permissible directions and this should be provided.

108 The draft CLP provides information on construction access and vehicle routings, which is welcomed. The final plan will however need to ensure that any potential impacts on the bus network due to construction accesses located on Dingwall Road are satisfactorily managed. In addition, the CLP will need to take into account pedestrian impacts, particularly if the Lansdowne Walk link between Dingwall Road and East Croydon station is delivered in advance of completion of construction work. The final CLP must also contain information on how the number of vehicle movements to and from the site can be managed and reduced through measures such as booking systems, load consolidation and off site fabrication.

109 The applicant has now responded to these issues, however, there has not been sufficient time to review this response and comment. These discussions will continue.

## **Energy and climate change**

### Energy efficiency standards

110 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 parameter will be improved beyond the minimum backstop values required by building regulations.

111 It is not clear from the information provided what the level of carbon dioxide saving is achieved from energy efficiency alone. The applicant should commit to, measures that can be adopted to enable the development to exceed 2010 Building Regulations compliance through energy efficiency alone. Given the outline nature of the building the applicant should provide the result of 2010 modelling that is representative of the type of spaces proposed in the development.

### District heating

112 The applicant states that Croydon Council is seeking to develop a district energy network to serve Croydon Metropolitan Centre which the development will connect to should the Croydon network be available. This should be secured as part of the legal agreement.

113 Should connection to the Croydon heat network prove unviable or timescales prove incompatible, the applicant should provide a stronger commitment to adopting a single site wide heat network linking all apartments and other building uses served by a single energy centre. This should be secured via condition.

114 The applicant has provided an indicative location for the energy centre. The applicant should confirm the size and proposed layout of the energy centre.

### Combined Heat and Power

115 A total of capacity of 750 kilowatt gas fired combined heat and power plant is proposed to supply a proportion of the heating requirements of the development. Indicative heat profiles have been provided, which is acceptable. The applicant should provide an estimate of savings achieved with this option after energy efficiency has been taken into account.

## Cooling

116 The proposed cooling strategy should be provided in greater detail. The applicant should outline passive measures to be adopted to minimise cooling demand. Where passive cooling is not sufficient the applicant should identify the areas that will require active cooling and provide further information on how this will be provided.

## Renewable energy technologies

117 The strategy outlines an options appraisal with no firm commitment to adopting any particular renewable option.

118 The applicant states that both the residential and commercial elements provide suitable roof level locations for photovoltaic panels due to the lack of over-shading. The applicant should provide a minimum commitment to adopting some photovoltaic panels. Roof drawing showing areas available and should provide an estimate of carbon dioxide savings and electricity generation.

## Climate change mitigation

119 35% of the roof area would be green or brown roofs. This level of green roof is low, and the applicant should seek to increase this figure, it is unclear why a greater amount of green roof cannot be achieved. In addition, the application proposes that 50% of surface water run off attenuated through sustainable urban drainage techniques. To ensure delivery the detail of these measures should be secured by an appropriate planning condition.

## **Local planning authority's position**

120 At the time of writing this report, the view of the local planning authority is not known.

## **Legal considerations**

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

## **Financial considerations**

122 There are no financial considerations at this stage.

## **Conclusion**

123 London Plan policies on; land use, opportunity areas, housing, design, access, transport and energy & climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Land use:** The proposed mix and quantum of use are acceptable.

- **Housing:** The level of affordable housing, tenure split and housing mix are unresolved.
- **Design:** Additional detail on the design code, single aspect units onto the train line, typical flat layouts, indicative visuals of the tall buildings, amenity spaces, and child play space is needed.
- **Access:** level of blue badge car parking.
- **Transport:** There are a number of detailed transport issues that need to be addressed.
- **Energy and climate change:** further detail on the energy strategy needs to be provided.

124 On balance, the application does not comply with the London Plan.

125 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Housing:** Finalise the level of affordable housing and the tenure split, increase the quantum of 3 bed units.
- **Design:** Provide further detail on the design code, provide further detail on the layout of the residential units, further visual information on the treatment of the taller buildings (particularly the residential buildings), address concerns about play space provision and the treatment of the car park between the two residential blocks on the northern part of the site, minimise the number of single aspect units facing onto the train line.
- **Access:** Clarify the quantum of blue badge residential space.
- **Transport:** address the transport issues relating to modelling, car parking, bus stands, taxi interchange and financial contribution as set out above.
- **Energy and climate change:** further detail on the energy efficiency measures and modelling, secure a connection to a future district energy system as part of the legal agreement, provide further detail on the cooling strategy, commit to the provision of a quantum of photovoltaic, secure planning conditions on the proposed green roofs and sustainable urban drainage techniques.

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