

1. DETAILS OF THE DEVELOPMENT

Ref: 21/06269/PRE
Location: Croydon Park Hotel, 7 Altyre Road, Croydon, CR9 5AA
Ward: Addiscombe West
Description: To demolish the existing buildings and erect a development to provide approximately 450 residential units (Use Class C3, as build to rent), internal and external amenity space, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas and works.
Applicant: Amro Flemyn Croydon Limited
Agent: Newsteer Real Estate Advisers
Case Officer: Georgina Betts

2. PROCEDURAL NOTE

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre-application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent applications, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 The report covers the following points:
- a. Executive summary
 - b. Site briefing
 - c. Place Review Panel feedback
 - d. Matters for consideration and officers' preliminary conclusions
 - e. Specific feedback requests
 - f. Procedural matters

3. EXECUTIVE SUMMARY

- 3.1 The scheme has so far been developed through a number of pre-application meetings with officers. It was considered by the Place Review Panel (PRP) on 20th October 2022 and their views are covered in section 5.
- 3.2 Discussions so far have focused on the principle of the development, the scale/height/massing, the design approach, impact on the streetscape and the adjacent conservation area and heritage assets (including non-designated), impact on the skyline from longer range views, impacts on neighbouring buildings (in terms of

light/outlook/privacy etc.), transportation matters, and discussions are ongoing in relation to affordable housing provision.

3.3 Due to its height the proposed development is referable to the Greater London Authority (GLA). The applicants have had pre-application discussions with officers of the GLA on the 28th October 2022 (with the LBC case officer in attendance) but the written response has not been received at the time of writing this report.

3.4 It is anticipated that a single full planning application will be submitted to cover the whole site.

4. SITE BRIEFING

- The existing site currently houses a large purpose-built hotel covering. Croydon Park Hotel opened in 1984 and was previously operated under an international hotel brand, which in recent years the hotel has closed and become disused and dilapidated. The building comprises of two sections, the primary accommodation block is constructed over ground and five upper floors. A further block is built over two floors comprising of both front and back of house facilities.
- A public car park is provided partially at ground level and within the basement of the existing Hotel, providing 87 parking bays.
- The site is located approximately 200m south of East Croydon Station, on the south-eastern corner of Altyre Road and Hazledean Road. The site forms part of an existing perimeter block with the site directly to the south occupied by Altitude 25, a 25 storey residential tower, with lower elements to the east.
- The remaining edges to the block are formed by linear buildings ranging from 9-4 storeys.
- The surrounding streets are predominantly residential buildings of 4-2 storeys, with Croydon Crown Court located directly opposite the Hotel on Altyre Road and the large Park Hill Park to the south off Barclay Road.



Image 1: aerial photograph

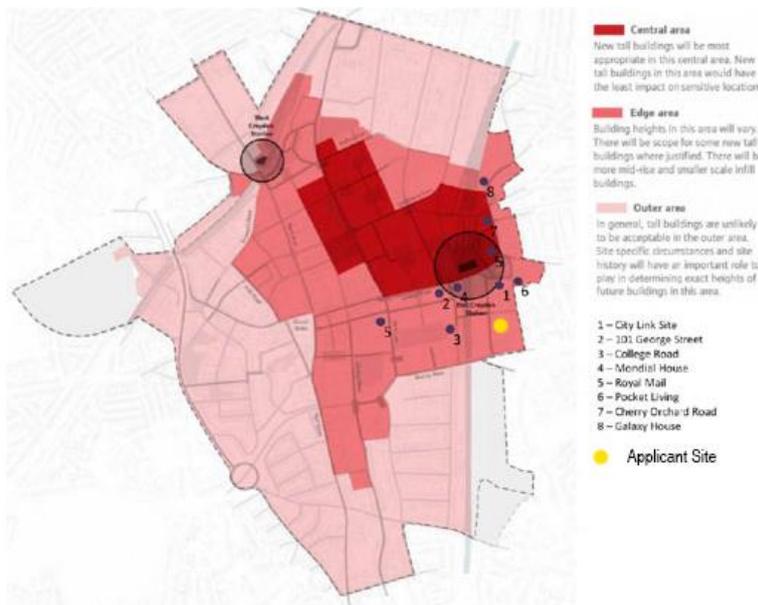
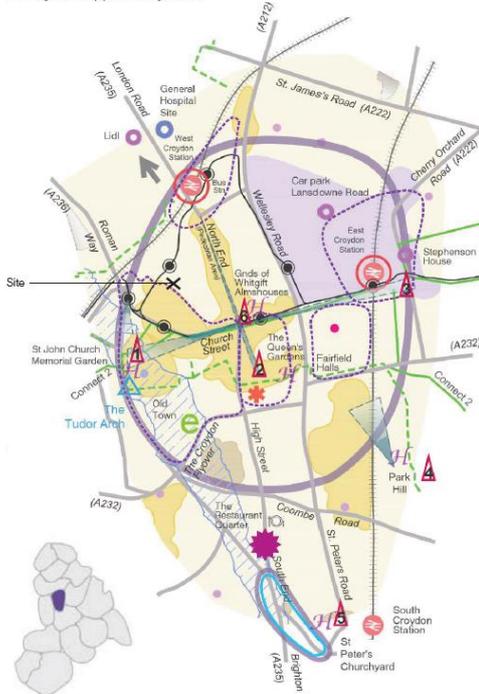


Images 2 and 3: birds eye views of the existing building

Designations

- The site is located within the Croydon Opportunity Area (so policy DM38 applies) and within the 'Edge Area' for tall buildings (See Images 4 and 5: Extracts from Croydon Local Plan 2018).
- The site has excellent Public Transport Accessibility (PTAL 6B), being in close proximity to East Croydon Station and numerous bus and tram links.
- The site in totality, is at a 1 in 100 year and a 1 in 1,000 year risk of surface water flooding and is at risk of ground water flooding.

Croydon Opportunity Area



Images 4 and 5: Extracts from Croydon Local Plan 2018

- All the roads around the site are within the Central Croydon Controlled Parking Zone.
- The site is not subject to a Tree Preservation Order although there are a number of established trees towards to the northern boundary.
- The site lies near to the Chatsworth Road Conservation Area (approximately 74m to the south of the site) and the NLA Tower which is a locally listed building (approximately 127m to the north of the site).

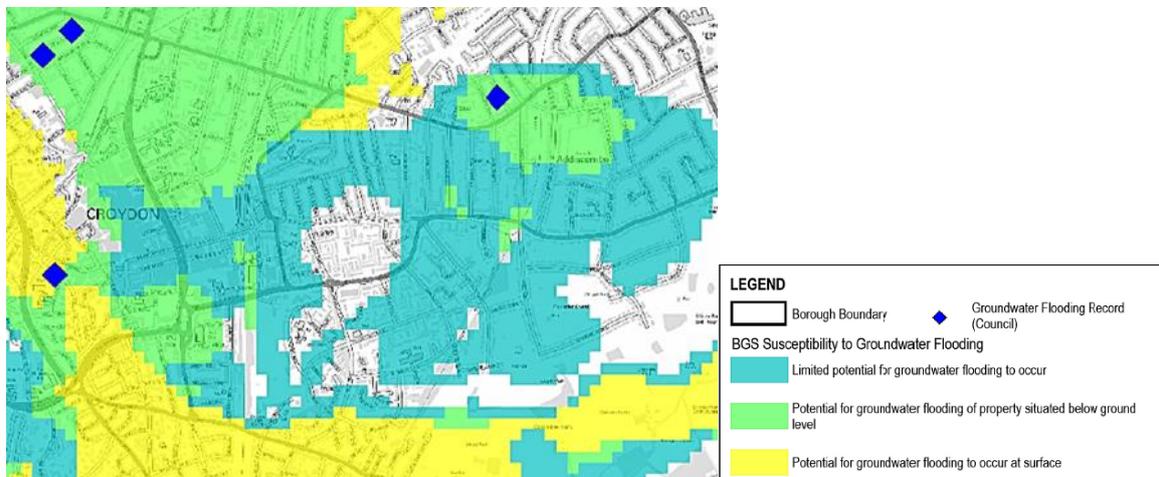


Image 6: Ground water Flood Map

Surrounding Area

- The surrounding area contains a wide variety of building types and scale, within the central cluster a number of tall buildings are either under construction or benefit from planning permission. Those either under construction or with planning permission range in height up to 49 storey (College Tower).

Relevant Planning History

| | | |
|---------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 22/04535/ENVS | Not required | Environmental Impact Assessment (EIA) Screening Opinion Request for the demolish all structures on site and construct two new buildings (linked by basement and ground floor) with the tallest building up to a maximum 43 storeys. The Proposed Development will provide: Up to approximately 500 residential build-to-rent (BTR) dwellings within three building blocks, Accessible parking spaces incorporating active or passive EV charging, Bicycle parking facilities and new landscaping and publicly accessible formal and informal play space, new tree planting and quality hard landscape areas at ground floor level. |
| 21/06269/PRE | | To demolish the existing buildings. To erect buildings to provide approximately 550 residential units, internal and external amenity space, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas and associated works. |
| 97/01367/P | PG | Alterations; erection of two single storey ground floor extensions to include installation of rotary and automatic doors |

Erection of five/six/seven storey hotel extension comprising 115 bedrooms, syndicate and function rooms and additional underground parking for 37 cars; erection of 2/3 storey and 4 storey buildings comprising 1 two bedroom, 13 one bedroom and 24 studio flats with underground parking for 45 cars

Proposal

4.1 The proposal has been amended during the course of on-going discussions. The current proposal is for the following:

- Demolition of the existing building.
- Erection of a building linked at ground/first floor, divided into two distinct elements:
 - Part 10, 12, 38 and 39 storey building, with the tallest element to the north-western corner.
 - A 9 storey linear building (with recessed top floor) fronting onto Altyre Road.
- Provision of (circa) 450 flats (Use Class C3, as Build to Rent).
- 43 basement car parking spaces, 14 blue badge spaces accessed from the existing basement crossover.
- Provisions of 718 cycle parking spaces and refuse storage at basement level.
- Communal outdoor amenity space within the courtyard and on rooftops.
- Indoor communal space.

4.2 The current unit mix comprises:

| Occupancy | Units | % Mix |
|-------------|-------|-------|
| 1 bedroom | 210 | 49% |
| 2 bedroom | 148 | 34% |
| 3 bedroom | 72 | 17% |
| Total units | 430 | 100% |



Image 7: current visual from Barclay Road



Image 8: current visual, north of Altyre Road

5. PLACE REVIEW PANEL FEEDBACK

5.1 An earlier iteration of the scheme was presented to the Council's Place Review Panel on 20th October 2022, see images and plans below. Note the scheme will be taken back for a second PRP in the New Year.



Image 9: Previous iteration presented to PRP

5.2 Strategy and Design Principles

- The Panel noted that as the Fairfield scheme had a resolution to grant but is not consented, it should not form part of the emerging context.
- The Panel commented on a need to concentrate on the fundamentals and principles as the level of resolution and detail in the façade outstrips the acceptability of other decisions that have been made.
- The Panel struggled to see the relationship with the Victorian character, stating that it seemed abstract, particularly from the Queen's Garden view.

- The Panel commended the commitment to net zero but noted that this has to be better defined and detailed at the next PRP.

5.3 Heritage

- The Panel were concerned that the heritage and townscape impacts do not seem appropriately assessed given how far everything else has progressed. They noted that there must be a proper photo montage and verified views showing seasonal and diurnal changes.
- The Panel commented that it is not just views that are important, but also the kinetic pedestrian experience, particularly in the Chatsworth Road Conservation Area.
- The Panel noted that guidance from Historic England would further inform what is required for a TVIA.

5.4 Massing

- The Panel's main concern is that the scheme is too high. The Panel noted the site's policy designation as an "Edge" location and guidance from Policy DM15 in Croydon's Local Plan. The site is outside of the central zone for tall buildings where the cluster should be a key focus. The Panel commented that the scheme's height does not make an appropriate transition to the low level residential nearby and would create wind problems. A 31-storey tower height would be more appropriate.
- The Panel noted that the mansion block should be a maximum of 9 storeys (8 storeys and setback) and set back more than 10m from the edge of Altitude 25 as 8 to 9m is far too close.
- Notwithstanding comments above, the Panel stated that should the height be acceptable, a higher tower and lower mansion block would be preferred and would give back to the street in a more positive way.
- The Panel were concerned about the width of the tower from certain views. It will appear particularly wide in diagonal views (South East and North West)
- The Panel commented that the footprint is not very efficient as it would naturally get smaller if larger units are removed from the tower and put into the mansion block instead.
- The Panel discussed how the tower grounds on Hazledean Road. It was recommended that the Applicant explore using a lower plinth on this edge to create a better relationship to the surrounding buildings.

5.5 Site Layout

- The Panel recommend providing some bike storage on the ground floor to encourage walking and cycling and for convenience. They also discussed the access to the basement cycle store and how this could be improved. Bicycles should not need to come up through the main lift or lobby.
- The Panel encourage providing extra amenity space on the roof of the mansion block, such as a café as there will be over 1,000 residents on this site.

5.6 Landscape & Public Realm

- The Panel commented that the ground floor amenity space needs better articulation and does not seem to create a positive street environment. The Applicant is encouraged to provide a more public offer, potentially something that integrates more with the cultural quarter.
- The Panel suggested taking a closer look at the ground floor experience as a pedestrian and improvements to the public realm, including the connection and existing crossing to Park Hill Park. The Panel asked if there was opportunity to upgrade the crossing point to Park Hill to improve this link.

- The Applicant should consider whether all play should be provided on site given the green route and connection to the park.
- The Panel also noted that all weather spaces are important and that covered social spaces should be provided in the courtyard.

5.7 Design

- The Panel noted the lack of dual aspect flats and encouraged increasing the proportion of dual aspect in the mansion block, which could be done if new cores are introduced. The Panel noted that whilst there are single aspect homes on the lower level of the mansion block, it is good to have duplexes at the ground floor level facing the street.
- The Panel suggested that some family units be redistributed into the mansion block.
- The Panel believe that it is difficult to justify not providing private amenity and balconies, especially at the lower levels and in the mansion block. Providing these would create a more sociable and community feel and the improve the experience of fresh air for all the family.
- The Panel stressed the importance of every tower core having natural light.
- The Applicant should consider revisiting the composition of the three forms with only the canopy linking them at ground floor. The Panel suggest introducing what is done at the top and overlaying the lower level.
- The Panel were not convinced at how the chamfered corners would translate externally despite the cut-off corner. The Panel recommend more testing to define the forms better.
- The Panel suggested considering whether the entrance should have another function that is more public.
- The panel suggested pulling the 7-storey tower down to ground level to terminate this elevation providing some relief to the bulk and massing. This could also have benefits in terms of wind mitigation.
- The Panel stated that the entrance of the mansion block was not shown and needs resolution.

5.8 Affordable Housing

- The Panel acknowledged the perceived difficulty in providing affordable housing above 15% given the market and viability assessment, however it is important that the development is design-led rather than profit-led. Generally, it was felt that the offer needs to substantially increase.

5.9 Architectural Expression

- The Panel acknowledged the reference to the Seifert building (No. 1 Croydon); however, that is a mass concrete building. The scheme proposes a white unitised system, which would result in staining around the joints. The Panel recommend considering different materials.
- The Panel noted that the material tone contrast is too stark.
- The Panel commented that the entrance on the corner becomes very formal with its art deco style and suggest introducing a bit of looseness at the top crown area.
- The Panel recommend embracing the opportunity and challenge of making the cluster (this site, 101 George Street, and College Tower) work together.

Summary

- 5.10 The Panel are very concerned with the tower's height and width and the lack of private amenity, as well as the mansion block's height and distance from Altitude 25. There is a lot of potential for connections with the cluster and with the public realm, making the scheme attractive for over 1,000 people. The Panel encourage the Applicant to think

more about the users of the building and the sense of community and shared amenity spaces. A summary of comments and key recommendations are given below:

- The Panel noted the need to revisit the principles that guide the design and massing with sufficient assessment of the environmental and townscape impacts.
- Specific commitments to energy need to be detailed with specification.
- More external private balcony space for fresh air and sitting out for residents.
- The Panel strongly recommend lowering the height of the tower due to its “Edge” location by 10 storeys and of the mansion block to a maximum of 9 storeys considering the 9-storey flank of Altitude 25.
- The Panel strongly advocate for significantly increasing the proportion of dual aspect units and the redistribution of some family units into the mansion block.
- The Panel recommend revisiting the form and function of the corner entrance area to be more public and sociable.
- Natural daylight to the tower core and all cores is vital and essential.
- The Panel emphasised the need to have some bike storage on the ground floor.
- The Panel advised that improvements to the public realm would enhance the pedestrian experience.

5.11 Further to the feedback from PRP, a number of amendments have been made, the key moves being identified below:

- Change in the footprint of the towers to allow for double form as opposed to the tripartite tower.
- Overall tower height increased from 31, 36 and 38 storeys to 38 and 39 storeys.
- Design, articulation and material amendments
- Increase in the height of the shoulder from 7 to 12 storeys.
- Linear block reduced to 9 storeys, including a set back at the 9th floor.
- Relocation of family units into the lower shoulder and linear buildings.
- Incorporation of external private amenity space to the linear building flats.
- Incorporation of a second core into the linear building, allowing more dual aspect flats.
- Affordable housing confirmed as 20%, which is an uplift from the initial offer of 15%
- Additional landscaping details provided
- Additional details in respect of the type, nature and use of the communal areas.



Images 10 and 11: PRP scheme (l) and current scheme iteration (r)

6. SUMMARY OF MATTERS FOR CONSIDERATION

6.2 The main matters for consideration in a future submission are as follows:

- Principle of Development
- Design, Townscape and Heritage
- Impact on Adjoining Occupiers Living Conditions
- Mix and Quality of Accommodation Provided
- Highways
- Environment
- Other matters
- Mitigation

Principle of Development

Loss of Hotel

6.3 There is no policy that would seek to protect existing hotel uses within the Croydon Metropolitan Centre.

Loss of Car Park

6.4 Part of the site is currently occupied by a Public Car Park. Policy SP8 of the Croydon Local Plan 2018 states that land used for public transport and land required to facilitate future transport operations will be safeguarded unless alternative facilities are provided to enable existing transport operations to be maintained. The applicant has undertaken a parking stress survey (outside of school holidays and formal industrial action) which demonstrates that the loss of the public car park would not result in an unacceptable loss of parking spaces across the Croydon Metropolitan Centre. The surveys have been reviewed by Officers and by colleagues within the Transport Planning Team and appear acceptable at this stage.

Residential Development

6.5 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year.

6.6 The scheme is for Use Class C3 residential, provided as 'Build to Rent'. Policy H11 of the London Plan 2021 covers this form of housing, listing criteria that must be met for proposals to qualify as build to rent. Given the early stage of the proposals, Officers are yet to discuss these matters with the developer, but in order to be policy compliant, the following criteria must be met:

- 1) the development, or block or phase within the development, has at least 50 units
- 2) the homes are held as Build to Rent under a covenant for at least 15 years
- 3) a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
- 4) all the units are self-contained and let separately
- 5) there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
- 6) longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months

- 7) the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked
- 8) there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence
- 9) providers have a complaints procedure in place and are a member of a recognised ombudsman scheme
- 10) providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

6.7 In addition to the above, a balanced approach must be adopted as to developing land for more efficient housing use while protecting character/heritage/neighbouring amenity etc. Therefore, the principle loss of the hotel and car park, and subsequent provision of a circa of 450 homes can be supported.

Design, Townscape and Heritage

General

- 6.8 Croydon Local Plan 2018 states that a tall building is a building that is 6-storeys high (25 metres) or which is significantly taller than its surrounding buildings.
- 6.9 The development plan contains a plan-led approach to guiding the location of new tall buildings, which in the case of Croydon would be within the Opportunity Area Planning Framework (OAPF). The site lies within the defined Edge area of the OAPF. Policy DM38.4 of the Local Plan states that within the Edge Area of Croydon Opportunity Area tall buildings may be acceptable where it can be demonstrated that there will be limited negative impact on sensitive locations and that the form, height, design and treatment of a building are high quality. The proposed height of up to 39 stories significantly exceeds the height of the immediate neighbours. Officers are of the opinion that a tall building could be supported given the sites OAPF location, relationship to heritage assets and proximity to the central cluster of tall buildings. Officers would welcome comments from Members on this matter.

Massing

- 6.10 The principle of a tower to the north-western corner of the site with lower shoulder and a linear building fronting onto Altyre Road is acceptable subject to the requirements of Policy DM38.4.
- 6.11 Whilst the building would be visible from a number of viewpoints officers are of the opinion that two interlocking towers could be acceptable subject to further design development. A full townscape assessment of these wider viewpoints has not yet been undertaken for the current scheme iteration. Officers are comfortable with a height exceeding that of Altitude 25 but feel that a balance needs to be struck between the sites edge of centre, transitional relationship to the central tall building cluster and wider suburban location. The tower would currently be a storey higher than Ten Degree's which would weaken the hierarchy given to the taller building cluster and surrounding urban form. The NPPF and London Plan encourages the best use of urban land in well-connected locations; the site benefits from excellent public transport links and government policy would support the optimisation of this site.
- 6.12 The overall massing has seen ongoing development which has amended the tower form from one split into three elements into two, as can be seen at 'Ten Degrees' further west

(and can be seen in images 9 and 10 above). Officers do have concerns over the revised massing with particular concerns in relation to the Altyre Road (south view) and the Hazledean Bridge view to the west. In these views the bulk and massing is more challenging although it is noted that the views from East Croydon Train Station are more slender in appearance.



Images 12 and 13: CGI view from Altyre Road (l) and Hazledean Bridge (r)

6.13 It is positive to see that the applicant team have reduced the height of the linear block from 10 storeys to 9 storeys and would now sit comfortably with the 9 storey blank façade of Altitude 25. Further work is required in terms of facade treatment and Officers are divided as to whether the design cue of the linear block should be taken from the residential scale of the wider suburban context or whether the linear building should align more with the design of the tower. As such Officers would welcome the views of Members in respect of the external appearance of the linear block.

6.14 The villa block attached to the side of the tower on Hazledean Road has risen from 7-12 storeys within the latest scheme. This villa building has transitioned into more of a low shoulder. Adverse impacts upon neighbouring buildings, and those on the opposite side of Hazledean Road, have yet to be fully assessed. This relationship is likely to be more challenging due to orientation, overshadowing and the potential for overbearing conditions within the street.

Active frontage

6.15 The reuse of the existing basement is encouraged whilst Officers are pleased to see an active frontage to the north-eastern entrance. Further information has now been received that indicates multiple communal uses on the ground floor that would align with a build to rent scheme, similar to the provision offered by 'Ten Degrees'.

6.16 There would be a gap of 7-10 metres between the tower and linear block while the two buildings would be linked on the ground/first floor, allowing for better management of the two buildings and shared amenities. Incorporating a gap between the tower and the linear block breaks down the massing of the development while also ensuring that the development would respect the lower heights of nearby buildings. Amenity areas would be provided within the ground floor of the towers, whilst private entrances to the ground floor units in the linear block would be provided alongside the communal entrances, activating the ground floor. Cycle and refuse stores would be provided within the basement area with a separate servicing left providing access onto the western/Altyre Road elevation.

6.17 The recent design iteration has reduced the pavement depth and generosity of public space at the base of the tower, especially around the corner entrance. As such, there is less scope for softening the landing of the tower through mature tree planting, landscape and public uses. As this is an Edge Area, this transition to the wider street scape and scales needs careful consideration. This will require further development and we would welcome Members thoughts on the matter.

6.18 Officers would like to see further information in regard to the public offer given that the former Hotel use was open to the wider public and that Policy DM15 (e) requires public access to buildings taller than 40 storeys (noting the scheme is currently to a maximum 39 storey). Officers would appreciate Members thoughts on this matter.



Image 14: CGI showing tower to left, mansion block centrally and Altitude 25 to right

6.19 The introduction of a second core to the linear block is a positive step and it is noted that the latest iteration now includes more dual aspect units, enhanced aspect units and the relocation of the family units to the lower levels of the shoulder and linear block.

Layout

6.20 The proposed layout consists of a tower to the north-western corner of the site which contains two interlocking floorplates with heights varying from 12, 38 and 39 storeys. To the north-east a 12 storey shoulder would sit adjacent to the properties on Addiscombe Grove while a 9 storey linear block proposed to the west fronting onto Altyre Road. A large communal space would be provided to the east and a parking area would be provided within the existing basement area; this would provide parking for disabled persons only. Visual permeability would be provided between the tower and linear building at second floor level, with the ground and first floor levels providing amenity to future occupiers. Officers are comfortable with the overall layout of the site and necessary amenity.



Images 15: Proposed site layout

Landscaping and Public Realm

6.21 The layout of the proposal allows for an improvement to the public realm to the north and western boundaries. The Hazledean Road frontage is currently a combination of public car park and end elevation of the vacant hotel building, whilst the Altyre Road frontage was used for the servicing of the former hotel, so there are opportunities for improvements as a result of the scheme. The proposal seeks to incorporate green corridors to Altyre Road and an improved public realm/square to the north-eastern corner of the site. Further extending this green corridor the length of Altyre Road would enable a green link between East Croydon Station and Park Hill and tie in with wider Green Grid planning. This wider public benefit and improvement to the street scape would help mitigate some of the impacts to existing neighbours caused by the scale of development. A multi-use communal amenity area is provided centrally within the site and would offer environmental benefits over and above the existing provision. Officers support this approach.

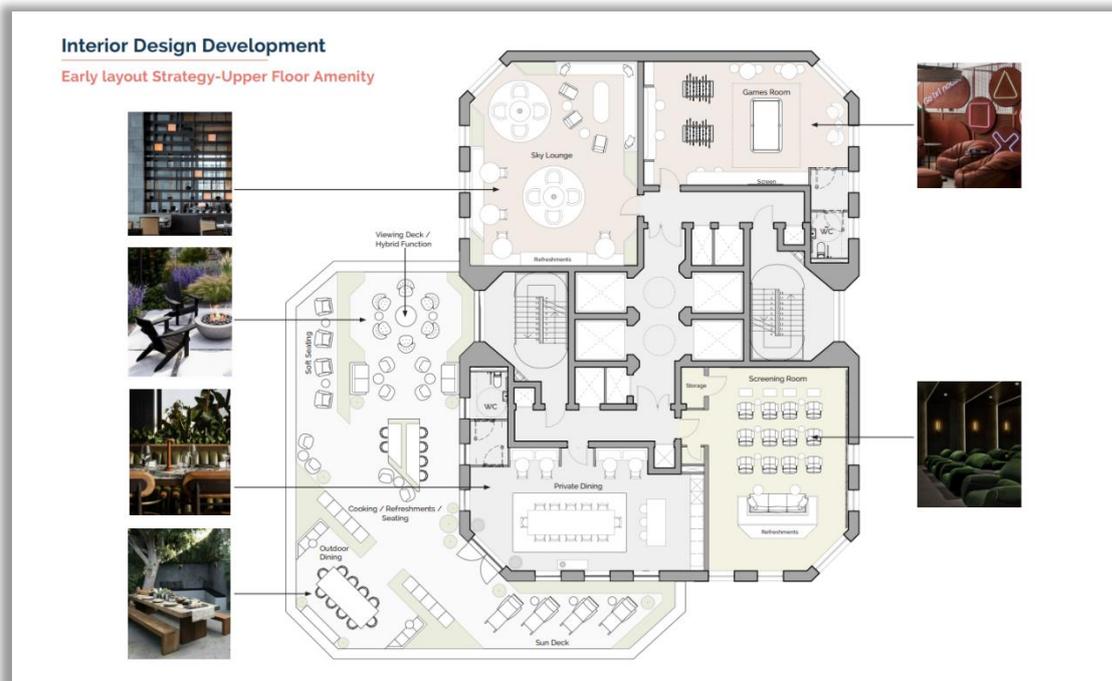


Image 16: Green corridor to Altyre Road



Image 17: New public square to Hazledean Road (example of amenity area to north-eastern corner)
 N.B the shoulder to the right has since increased in height since this image was produced

6.22 External communal amenity space will be provided in the central part of the site and on the roof of the 39 storey tower, with internal amenity provided on the 38th floor of the taller tower (linking to the external as shown in the image below). Given the build to rent typology, there would also be internal resident amenity at ground floor, with plans currently showing co-working spaces, gym/fitness centre, greenhouse/entertainment spaces, pet spa, children’s play and community facility, as well as servicing facilities for the building. The initial indicative layout of these spaces are encouraging and seek to provide a wide offer for future occupiers.



Images 18: Roof top amenity (assumed 39th floor)

6.23 The scheme has been designed to allow for the retention of street trees and additional tree planting to the northern and western boundaries. Such retention and provision would also result in benefits such as urban greening, street scape improvement works, ecological and/or biodiversity enhancement and wind mitigation (if needed).

Architectural Expression

- 6.24 The current scheme proposes different material approaches for the tower and the linear block, with the tower built using a mix of red terracotta and red coloured concrete cladding system, whereas the linear block primarily uses brick. The latest iteration has reduced the contrast and number of materials, both between and within each building, resulting in a calmer and more rational arrangement. This is seen as a positive step although further development is needed to balance the compositional relationship of façade forms and materials between the tower and linear block. Generally, the material palette is supported as if references the widespread buildings within the edge of centre and suburban locations, in particular the Grade II listed water tower within Park Hill. The grid like approach to the tower is reminiscent of the post war and emerging character of the wider metropolitan centre and the architectural rationale is supported. The underlying design principles guiding the architectural expression of the tower uses a tripartite approach that defines the base, body and crown with strong vertical expression within an underlying façade grid, helping to elongate the massing forms. The grid subtly changes to define each one of the conjoined tower forms and adapts to different elevational aspect to deal with challenges such as overheating and internal daylight conditions. Whilst Officers are supportive of these generally principles, further development is required.
- 6.25 However, Officers have concerns regarding the form and architectural expression of the linear block. At 9 storeys, the linear block would be classed as a tall building in its own right and a balance needs to be struck between the hierarchy given to the vertical and horizontal expressions. The principle of some divergence from the architectural design of the tower is supported, as the approach should look to compliment rather than copy. Currently the linear block appears too detached from the language of the tower and would benefit from further consideration i.e. sharing of facade proportions and a closer material tone. Officers are of the opinion that the linear block should have a better relationship to the tower whereas currently the two-design options compete with each another. This concern was supported by PRP and should be a key focus moving forward. Officers would welcome the comments of Members in this respect.



Image 19: Image depicting the relationship between the linear block and the tower

- 6.26 A public art strategy will need to be formed as part of any submission and the earlier that this is considered the more holistically it can be integrated with the architectural and landscape designs.

Heritage

- 6.27 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. With regard to conservation areas (at section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance. Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets.
- 6.28 The site does not lie within a Conservation Area but is close to the Chatsworth Road Conservation Area (150m to the south-west). In terms of non-designated heritage assets, the NLA Tower (local listed building) lies 160m to the north and Fairfield Halls (local listed building) lies 270m to the west. Park Hill Locally Listed Historic Park and Garden lies 80m to the south. Views from these assets are in the process of being tested and the design rationale is being informed by such. In this case the proportions of the tower have reduced to ensure that the tower is slender in the views from these assets. It is however noted that the view from the Chatsworth Road has altered and from some oblique views the tower appears wider than in previous iterations. The scheme is progressing well from these viewpoints however further testing is required to ensure that the towers do not appear overly dominant. Officers have agreed a provisional list of verified views with the applicant.

Impact on Adjoining Occupiers Living Conditions

- 6.29 During the course of pre-application discussions concerns were raised in regard to the separation distance to the properties on Addiscombe Grove (to the east) and those to the north of Hazledean Road. It is noted that due to the reduction in tower form from 3 to 2 elements and with the increase in the height of the shoulder from 7 to 10 storeys, the footprint has increased as a direct consequence. Careful consideration will be required as to the direct impact on these neighbours. The applicant has undertaken high level daylight and sunlight assessments, but Officers are pursuing the full results to fully understand the extent of impact.
- 6.30 The height of the linear block has been reduced to nine storeys to address concerns of PRP and Officers. Officers are comfortable with the separation distances between the linear block and the residents on Addiscombe Road. In addition, the applicant has demonstrated that the linear block would not prejudice the redevelopment of the law courts should this come forward at a later date (regardless of the law courts not being identified as a site allocation).
- 6.31 Turning to the tower itself, Officers currently have some concerns in respect of the impact on the daylight and sunlight of the neighbouring properties to the north of Hazledean Road. This is currently being tested by the applicant however initial studies suggest that vertical sky component (VSC) levels in the mid-teens could be maintained which is generally accepted in urban environments. Separation distances between these residents and the tower are acceptable and while the tower will be visible, and the neighbouring outlook will change, Officers are currently of the view it would not be to a degree that would result in significant harm to the residential amenities, when assessed in the planning balance. It is noted that there are a number of trees to the northern boundary of the site that will be retained and enhanced as part of the proposal while there are a number of trees to the south of the Hazledean Road properties.

- 6.32 The twelve-storey element to the east of the tower would sit relatively close to the Longitude Apartments on Addiscombe Road, with a separation distance of approximately 13 metres. It is noted that an enhanced public realm and/or square would be provided between the twelve-storey shoulder and Longitude Apartment which would not only benefit future residents but would allow access to the existing residents. Further work is required here to ensure that the amenities of Longitude Apartments are protected from significant harm. Officers are relatively comfortable with this relationship given its urban context, but a full contextual evaluation will be required to demonstrate impacts have been limited as far as practicable.
- 6.33 Based on the direction of the proposals Officers are generally supportive of the adopted approach; however further information is required to demonstrate that any harm has been limited as much as possible.
- 6.34 Third party comments received on any formal application will also need to be considered as part of any future scheme assessment.

Mix and Quality of Accommodation Provided

Mix

- 6.35 Croydon Local Plan 2018 (adopted February 2018) policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 allows for setting preferred mixes on individual sites via table 4.1. The provision of 20% 3-bedroom or larger units is the policy target for sites with a PTAL of 4 or higher within in a 'Central' setting. The Croydon Opportunity Area Planning Framework (2013) defines the site within 'Mid Croydon and Fairfield' where the requirements is for 20% of homes to be for families, consistent with DM1.1. The scheme currently provides for 17%, which is slightly short of the policy requirement.

Affordable Housing

- 6.36 Based on the applicant's financial viability assessment, they suggest that the scheme is not viable to deliver any affordable housing. Officers have sought independent review of this document and this work is progressing. There are some matters not in agreement, such as the benchmark land value. Key matters such as rental values, build costs and operational costs are still being worked through.
- 6.37 Notwithstanding the viability position above, the applicant is offering 20% affordable housing at a split of 70:30 in favour of discounted market rent vs London living rent. Whilst the split would accord with H11 of the London Plan (given the scheme is build to rent), Officers have concerns with the 20% and would need to work with the GLA on this, but are alive to the current economic climate and would welcome feedback from Members.
- 6.38 It is therefore very likely the scheme will need to be viability tested (on the basis it will not meet 50% on-site to be eligible for fast-track). Officers will seek to secure the maximum level of affordable housing deliverable on the scheme.

Quality

- 6.39 The current proposal is to provide circa 450 homes, which has been reduced significantly from the initially presented 550 homes. The tower would be accessed via a single core with two stair cores. The residential levels in the lower portion of the building would contain 11 units per core, with 6 from the northern side (with its own stair core) and 5 from the southern side (again with its own stair core). This would reduce to 8 units overall

in the 38/39 storey element, with 4 from the northern side of the core and 5 from the south. Officers understand the approach adopted.

- 6.40 Officers and PRP have challenged the applicant to maximise dual aspect homes. With the exception of one southern aspect studio home, all units within the 38/39 storey tower would be either dual aspect or provided with an enhanced aspect (so not strictly dual aspect, but a degree of alternative outlook) given the interlocking floor plates. Officers support the improvements made to this scheme in this regard.
- 6.41 The linear block, currently at nine storeys, would have two distinct cores. Officers welcome the introduction of a second core to the linear block which has allowed for more dual aspect units and better sited family homes. These units are now provided with private outdoor amenity space (in the form of balconies at upper floors) which is an improvement upon previous iterations. Except for two units in the eastern elevation, all units would be either dual aspect or provided with an enhanced aspect. Officers support the improvements made from previous versions of the scheme.
- 6.42 It has been made clear that minimum floor areas (London Plan and National Standards) must be achieved, and private amenity space must meet the minimum required size relevant to the unit. The applicant has provided oversized units within the tower, given the air quality and usability of balconies within the tower form; further justification is required on these points for officers to support no private external amenity. The units within the linear building have now been provided with private balconies while the ground floor units would be provided with private terrace areas.
- 6.43 Regardless of the final layout, daylight and sunlight adequacy analysis must be submitted to illustrate that all habitable rooms within the development achieve the minimum targets set by BRE Guidance. This should assess the future occupiers' light receipt against both 2011 and 2022 BRE Guidance.
- 6.44 Preliminary landscaping plans have been provided demonstrating that communal amenity space and playspace would be provided within the central courtyard and on the roof top amenity. Further details are required, and the final layout and quantum of external amenity space is yet to be confirmed, but an initial assessment looks positive.
- 6.45 The main communal entrance to the tower is well situated and clearly visible from the street. The two entrances to the linear block are sited approximately equally along the front façade, although the point of arrival needs further design work to improve its legibility in the street scene.
- 6.46 The applicant is aware that housing should cater for residents' changing needs over their lifetime and that 10% of units would need to be wheelchair accessible and 90% adaptable. Appropriate facilities, furniture, storage and turning space must be demonstrated on the plan's come submission. It is noted that 6 lifts are included in the tower and 4 within the linear block, two per core of the linear block. The applicant should note D5 of the London Plan in relation to the need for a fire evacuation lift per core, and a fire statement will be required as part of any formal submission (D12 of the London Plan). The applicant has advised that the buildings have been designed to meet current fire regulations, including Gateway One. The Health and Safety Executive will be a formal consultee on any future planning application.
- 6.47 The impact of noise and air quality on residential amenity will need to be considered, especially as the surrounding roads make up a busy part of the road network. The

applicant will need to demonstrate how internal areas and balconies achieve an acceptable standard; accordingly, noise and air quality assessments are expected with any future application. Suitable passive ventilation and avoidance of overheating will need to be demonstrated.

Highways

6.48 The roads around the site fall within a controlled parking zone while the site currently provides a public car park at both basement and ground levels.

6.49 The site is situated in an area with an excellent public transport accessibility level of 6b and is within a short walk of East Croydon Train Station.

Loss of public car park

6.50 A Parking Survey has now been submitted and Officers are satisfied that the loss of the public car park can be supported.

Residential Parking

6.51 Given the sites highly accessible location the scheme would be expected to be car free, with the exception of only blue badge parking within the site in line with London Plan and Local Plan policy. The applicants have complied with this requirement and only blue-badge parking is currently provided within the basement. On the basis the site is within a CPZ, and the development is proposed to be car-free, it is expected that the developer enter into a legal agreement to ensure future residents will be prohibited from applying for on-street parking permits, thereby controlling parking availability and parking stress within the CPZ.

Car Clubs

6.52 A car club space would be provided on street to the northern boundary in the location of an existing crossover, so there would be no loss of on-street parking. The costs of providing this would be borne by the developer. Discussions have taken place throughout the course of various meetings which have sought to move the car club bay off site. This has been achieved to reduce levels of hardstanding on site while providing a high-quality public realm. Zip Car operates in the Croydon area and as such this demonstrates a demand for car clubs within the area. In addition, membership for three years for all future occupiers would be secured within any legal agreement.

Cycle parking

6.53 Based on the current number and mix of units proposed, the London Plan minimum cycle parking standards for the are as follows:

- 755 long-stay spaces for residents.
- 88 short-stay spaces for visitors.

6.54 A number of built-in cycle storage spaces have been shown in the basement and at surface level. At this stage the storage capacity is not known, but the applicants have been made aware of the above requirements and have indicated their intention to meet them. Provision of larger adaptable bicycles (5%), as well as electric bicycles, must be incorporated.

Access/Servicing

6.55 Access to the basement will remain as existing but may be subject to alteration to allow for smaller delivery vehicles. A servicing bay would be provided on Altyre Road and is at

this time considered appropriate for refuse collection and other larger servicing requirements. Further details would be secured as part of a S278 agreement with the Highways Team at the legal obligation stage. Subject to full details the access and servicing arrangements are considered appropriate for a site of this size and scale.

- 6.56 An Active Travel Zone assessment will be required, in accordance with TfL's latest guidance, to demonstrate that there are suitable opportunities for all future users of the proposed development to access local amenities by walking, cycling or public transport in line with the Mayor's Healthy Streets approach. This may require improvements to routes to East Croydon Station and the town centre beyond, born by the developer.
- 6.57 Details of delivery and servicing will be required, as well as construction logistics. A Travel Plan for future occupiers will need to be worked through.

Mitigation

- 6.58 Contributions (starting point being £1,500 per unit) towards improvements in sustainable transport will be required, along with restriction of access to parking permits in the Central Croydon CPZ, car club provision / membership and EVCP infrastructure. Highway agreements will be required for all changes to the public highway and the adoption of widened footways, as well as upgrades to pavements around the site required as a result of the provision of a tall building.
- 6.59 Transport for London are likely to have further requirements and financial obligation requests.

Environment

Building performance

- 6.60 All major development, such as this, should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- 6.61 The applicant has indicated that the proposed development would be Net Zero Carbon which is welcomed. As this scheme will be referable to the Mayor the whole life-cycle carbon emissions should be calculated through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate action taken to reduce life-cycle carbon emissions. As a GLA referable scheme it will also need to include a Circular Economy Statement that aims to be net zero-waste. Heat Risk needs to be managed and water consumption restricted.
- 6.62 Given that work is mainly still on going in relation to the townscape and transportation matters the majority of these elements are still being developed and further detail will be known when the scheme is advanced. The scheme should be able to meet these requirements.

Flooding

- 6.63 The site is located within in a 1 in 100 year and 1 in 1000 year surface water flood risk and is also subject to critical drainage flooding. In accordance with Policy DM25.1 and

Table 8.1 of Croydon's Local Plan all development on sites at risk from other sources of flooding area required to run a sequential test and exception test.

- 6.64 A site-specific Flood Risk Assessment proportionate with the degree of flood risk posed to and by the development, taking account of the advice and recommendations within the Council's Strategic Flood Risk Assessment and Surface Water Management Plan, is required.
- 6.65 Subject to satisfying the above requirements and priority given to the provision of Sustainable Drainage Systems (SuDS) unless demonstrated to be inappropriate, the principle of residential development would be acceptable.
- 6.66 The applicants have been advised to undertake separate pre-application consultation with the Lead Local Flood Authority (LLFA).

Air

- 6.67 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). As indicated above an air quality report will need to be submitted with any application. This must include how the ground floor residential units, amenity areas and balconies fronting the adjoining roads are suitable from an air quality perspective. Should the development increase air pollution or be located in an area subject to breaches then mitigation will be required.

Microclimate

- 6.68 The applicant has begun to explore wind impacts and what mitigation would be required. This is critical given wind conditions near East Croydon station and the applicant must work carefully with Officers to ensure the correct scenarios are tested, with the correct cumulative schemes in place and wind tunnel tested. Officers have advised that any mitigation must be designed in from the outset as opposed to being an afterthought. PRP's suggestions may help to integrate such requirements into the design with the termination of the tower at ground floor level. Officers are comfortable that discussions are progressing well.

Trees

- 6.69 There are two prominent street trees on the northern Hazledean Road frontage; these must be safeguarded and protected during any works. There are several trees with the application site along the northern boundary that appear less prominent. These will need to be surveyed and if any removed, this justified and additional planting secured. To the Altyre Road frontage there are no street trees, but there are two prominent specimens within the application site that should be retained.
- 6.70 Additional planting is proposed and would be an integral element of the design of the scheme. Such details are capable of being secured through condition however Officers are comfortable that sufficient space is available for meaningful planting.
- 6.71 It is understood why an 'Urban Greening Factor' has not been produced at this stage, but evidence will be required showing how a future scheme meets the minimum target of 0.4.
- 6.72 The NPPF and London Plan policy G6 requires that any development seeks to provide biodiversity net gain. Such details will need to be worked through as the scheme progresses but is considered possible given the current building and car park on site.

6.73 An EIA Screening Opinion (22/04535/ENVS) was issued prior to the submission of the planning application. The development was not considered to require an EIA, taking account of its location, nature, scale, and characteristics.

Other Matters

6.74 Both the NPPF and London Plan Policy seeks to create safe, secure and appropriately accessible environments where crime, disorder and fear of crime do not undermine the quality of environment. Any future application should be mindful of Secured by Design principles and improve natural surveillance / lighting of the area.

6.75 In line with Policy DM16 of the Croydon Local Plan (2018) a health impact assessment will need to be submitted with the planning application.

Mitigation

6.76 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions are forthcoming in relation to the Heads of Terms, but it is anticipated that these would include the following (this is not an exhaustive list):

- Affordable Housing (on-site)
- Affordable housing review mechanisms (early and late stage)
- Build to rent criteria and covenants
- Employment and training contributions and obligations (construction/ operational)
- Air Quality contribution
- Zero carbon offset (if required)
- Future connection to District Heating Network
- Sustainable transport contributions (to include cycling enhancements)
- Car parking permit restrictions
- Car club provision and membership (3 years free)
- Travel Plan
- Transport for London contributions
- Public realm delivery and maintenance
- Street tree provision and maintenance
- Highway works
- Wind mitigation
- Television signal mitigation scheme
- Retention of scheme architects
- Relevant monitoring fees

7 SPECIFIC FEEDBACK REQUESTED

7.1 In view of the above, it is suggested Members focus on the following issues:

1. The principle of tall buildings across the site, with the tallest 38/39 storey tower to the north-western corner.
2. The amount and distribution of scale/bulk/height across the site, particular in the context of adjoining heritage assets.
3. The design approach and elevational detail including materiality of both buildings (the tower and the linear building), as well as their relationship to each other.
4. The 20% affordable housing provision.
5. The 17% family mix and standard of the accommodation provided.

6. The potential impacts on neighbouring residential amenities in terms of light, outlook and privacy.
7. The importance of public realm, urban greening and biodiversity.

8 PROCEDURAL MATTERS

- 8.1 The applicant has submitted a pre-application to the GLA for an initial opinion on the proposals. The meeting took place on the 28th October 2022 and Officers were present at this meeting, no formal response has been received at the time of this writing this report.
- 8.2 Officers at the GLA shared the views of Council Officers and that of the PRP as covered above in the main body of the report. GLA Officers were not concerned with the overall height of the towers and did not raise an issue in terms of the competing height with the central cluster of tall buildings in the CMC. GLA Officers were not convinced in terms of the argument for the lack of private amenity space for upper floors of the towers but acknowledged concerns regarding noise and air quality; further concerns were raised by GLA Officers in regard to single aspect units. GLA Officers were uncomfortable with the offer (at that time) of affordable housing (at 15%) and suggested that the applicant liaise further with the GLA's viability team prior to the submission of a planning application. In conclusion, GLA Officers encouraged the applicant's team to review the comments from Officers and re-engage through their pre-application process prior to the submission of planning application.