

D&P/2229a/01

7 April 2016

Lansdowne Road, Croydon**in the London Borough of Croydon****planning application no. 16/00471/P****Strategic planning application stage 1 referral**

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

The proposal

The proposal is for a residential led mixed-use development of 917 residential units, 22,305 sq.m. office and 2,415 sq.m. retail floorspace arranged on a podium based development with two towers of 64 and 37 storeys with a shared communal gardens.

The applicant

The applicant is **Guildhouse Rosepride**, the architect is **CZWG** and agent is **MRPP**.

Strategic issues

This application raises issues in relation to **housing mix, affordable housing, density, urban design, heritage, children & young person's play, inclusive access, energy, flood risk and transport**.

Recommendation

That Croydon Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 126 of this report; but that the possible remedies set out in the paragraph could address these deficiencies.

Context

1 On 26 February 2016 the Mayor of London received documents from Croydon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 7 April 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A and 1c of the Schedule to the Order 2008:

- 1A. Development which comprises or includes the provision of more than 150 houses, flats or houses and flats.
- 1C. Development which comprises or includes the erection of a building of one or more of the following descriptions: (c) the building is more than 30 metres high and is outside the City of London.

3 Once Croydon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is located at the corner of Wellesley Road and Lansdowne Road in central Croydon. The existing buildings on site currently accommodate a hotel, café, gymnasium, hostel and offices, range from four to eleven stories.

6 The site is bounded by Lansdowne Road to the south, Wellesley Road to the west and commercial developments to the north and east. The A212, Wellesley Road forms part of the Strategic Road Network (SRN). The nearest section of the Transport for London Road Network (TLRN) is the A232 Barclay Road, located approximately 500 metres to the south.

7 East Croydon Rail Station is less than 500 metres to the southeast of the site providing national rail services to several destinations, including trains to central London. Approximately 500 metres to the north, West Croydon Station provides access to rail and TfL Overground services. Wellesley Road Tram Stop is the nearest located less than 100 metres to the south providing eastbound services to Beckenham Junction, Elmers End and New Addington. George Street provides westbound services to Wimbledon located approximately 300 metres to the southwest of the site. Over 30 bus routes can be accessed within a reasonable walking distance from the site, with the nearest stop located on Wellesley Road. Consequently, the site has an excellent public transport accessibility (PTAL) of 6a on a scale of 1 to 6, where 6 is the most accessible.

Details of the proposal

8 The proposal is for a residential led mixed use development of 917 residential units, 22, 305 sq.m. office and 2,415 sq.m. retail. Key elements to the design are as follows:

- Podium based development accommodating two residential towers of 64 and 37 storeys.
- Vertical mixed use.
- Shared communal gardens/spaces on levels 4 and 11 (linked to internal crèche/play areas) and a smaller terrace on level 28.
- Swimming pool/gym between the two towers on level 12.
- Double height ground floor accommodating retail and residential entrance foyers.
- Three full floors of office floorspace (levels 1-3) and a further 7 floors of office in the Eastern tower (levels 4-11).
- West Tower residential floors 12 to 37 and East tower floors 13 to 64/65
- Roof top restaurant and viewing gallery (floors 64-67).



Case history

9 The application has been subject to the GLA pre-application process and an advice report (D&P/2229/01) was issued on 18 December 2015.

10 An extant permission is in place on part of the site (1-5 Lansdowne Road), under Croydon Council planning ref. 11/02986/P, for a mixed-use development (residential, office, café/restaurant, leisure, and hotel) in a tall building rising to 55 storeys over basement level. This consent does not expire until March 2017. The current proposal is a significant revision of this consent and incorporates the Voyager House site to the immediately to the north.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

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|---------------------------|--|
| • Land use principles | London Plan; Mayor's Town Centres SPG; |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; draft Interim Housing SPG'; Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Heritage | <i>London Plan</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;</i> |
| • Tall buildings/views | <i>London Plan</i> |
| • Heritage | <i>London Plan</i> |
| • Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |
| • Transport and parking | <i>London Plan; the Mayor's Transport Strategy;</i> |

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Croydon Local Plan: Strategic Policies DPD (April 2013), the 'Saved' policies of the Croydon Replacement UDP (July 2006) and London Plan (with consolidated alterations since 2011).

13 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- Croydon Opportunity Area Planning Framework (OAPF) (January 2013).

Principle of development

14 The development proposals are for a mixed-use scheme of 917 residential units, 22,305 sq.m. office and 2,415 sq.m. retail floorspace.

Extant consent

15 The March 2012 extant consent (Croydon planning ref. 11/02986/P and D&P/2225)) was for a smaller site area excluding Voyager House this was for the demolition of existing buildings and erection of a part 12, part 16, part 55 storey building, comprising residential (Use Class C3), office (Use Class B1), café/restaurant (Use Class A3), leisure (Use Class D2), and hotel (Use Class C1); with associated parking, landscaping and access. The consent expires in March 2017 and is unlikely to be implemented due to development viability.

16 There are significant land use changes from the extant consent and these are the removal of the hotel, an increase in office floor space and a substantive increase in the number of residential units from 397 to 917 dwellings.

17 The extant consent is a material consideration, however changes in national, regional and local planning means the increase in the site area, the addition of a further tower and increase in the height of the main tower and in the land use mix should be considered as a new application on its own merits.

Residential

18 London Plan policy 3.3 seeks to increase London's supply of housing and in doing so sets borough housing targets. The London Plan (2015) sets Croydon's target at 1,435 additional homes per year between 2015 and 2025. The OAPF provides a further policy target capacity of a minimum of 7,300 new homes for central Croydon. The proposals seek to deliver 917 units, which will contribute approximately 64% towards Croydon's annual target, and approximately 12.5% of the indicative minimum housing target for the OA. Although the increase in the number of residential units from 397 to 917 dwellings is supported, this support is subject to achieving a policy compliant scheme with a high residential design quality throughout the development.

Office

19 The applicant has substantially increased the office floorspace to 22,305 sq.m. and this according to the applicant is a result of an identified uplift in the Croydon office market. The office floorspace will have a large floorplate format allowing for adjustment to floorplans meeting modern occupier need for flexible layouts. London Plan table A2.1 identifies Croydon town centre as being in need of regeneration and the office market in need of rejuvenation through speculative office developments and as in the case of the proposed scheme promoted as part of wider residential or residential and retail/leisure mixed use development. The office floorspace is strongly supported.

Retail

20 The applicant is proposing 2,415 sq.m. of retail floorspace on the ground floor, this will contribute to the vitality and viability of Croydon metropolitan centre, which London Plan table A2.1 identifies as being in need of regeneration. The scheme will provide important active retail/leisure frontage on the strategically proposed east-west link between the Whitgift Centre and East Croydon Station and is therefore supported.

Loss of hostel

21 As with the extant consent the scheme will result in the loss of a hostel. As this use is protected by London Plan policy 3.14C (existing housing). The applicant will therefore need to ensure, as with the extant consent, that a hostel is re-provided off-site.

Conclusion

22 The land use mix complies with the guidance set out in the Croydon Opportunity Area Planning Framework (adopted January 2013). The site is located in the Central Croydon character area where the land use approach is to encourage office, retail and residential uses. The increase in the quantum of residential floorspace from that in the extant consent is supported subject to the scheme achieving a high residential quality and compliance with the affordable housing guidance in the Croydon AAP. The office and retail floorspace is strongly supported, as this floorspace will contribute to the vitality and viability of Croydon Metropolitan regional centre.

Housing mix

23 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing.

24 In this instance the Croydon Opportunity Area Planning Framework provides further area specific policy guidance, with the West Croydon character area having a requirement of 20% three bed+ units in all developments, but it is also accepted that this is not required in all schemes or appropriate to all sites.

Table 1: Housing mix

	No.	%
Studio	180	19.6
1 bed	362	39.5
2 bed	314	34.1
3 bed/	53	5.9
3 bed/6 person apartments	8	0.9
Total	917	100

25 The proposed housing mix is heavily weighted towards studio and one and bed units which of 59% of all dwellings with just 6.8% three-bed accommodation. This provision is substantially less than the 20% sought by the Croydon OAPF. The applicant has argued that the limited number of three-bed units is a result of viability, market demand and the site location. Whilst it is accepted that the OAPF allows for a degree of flexibility in housing unit mix given different site location, it is GLA offices opinion that the housing mix is too imbalanced towards studio and one bed unit provision. This has impacted on residential quality with more than eight units per floor across the development and a number of north east facing single aspect studio units. It is noted in similar very tall buildings across London and recent consents in Croydon have achieved a more balanced housing mix. Therefore this mix should be revised.

Affordable housing

26 London Plan policy 3.12 requires that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use

schemes. Negotiations on sites should take account of their individual circumstances including development viability, resources available from registered providers (including public subsidy).

27 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit or other recognised appraisal methodology is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation.

28 In this instance the Croydon Opportunity Area Planning Framework provides further area specific policy guidance that includes the objective of securing as a minimum 15% affordable housing. Whilst Croydon Council local requirement in its Core Strategy is for 50% of any future housing development to be affordable housing.

Extant consent affordable offer

29 The extant scheme was determined in January 2012 and the Croydon Core Strategy policy was still emerging, but required 20% in the Croydon Opportunity Area (COA) by the date of the committee meeting (12th January 2012), emergent policy proposed to seek 15% affordable in the COA.

30 The applicant claims this was wrongly cited and the change that occurred between the Proposed Submission for Publication Draft (September 2011) and the Minor Factual and Evidence Based Changes made in December 2011 was ignored. The applicant further draws attention to the emerging policy which contains a review mechanism to allow 10% of the required affordable housing to be delivered on site and the remainder to be calculated on the basis of future viability. The applicant also argues that The Inspector's Report (17th December 2012) into the submission Core Strategy notes that there were a number of schemes within the COA where the policy had been "applied to and adhered", and the extant scheme was listed as one of these schemes.

31 It is GLA officers opinion that the application will be treated as a fresh application and that the Croydon AAP requirement to secure as a minimum 15% affordable residential units. Also given the OAPF has now been policy guidance for 3 years and changes in the residential market have pushed values to a significantly higher level thereby improving development viability generally and at least 15% should be pursued in this instance.

Current affordable offer

32 The applicant's initial affordable housing offer is being negotiated with Croydon Council, but the applicant's planning statement has indicated that the scheme will deliver 15% of total provision as affordable housing on-site (based on the number of habitable rooms). Across the development, this would equate to 316 habitable rooms or 107 affordable units (11.6%).

33 The proposed affordable housing offer is, at the time of report drafting, still to be subject to the findings of an affordable housing viability assessment. The applicant claims this offer is in excess of the COA policy that allows only 10% to be delivered on site with the balance, up to 15%, to be delivered off-site or via a commuted sum. This offer is made because it considers that delivering 15% on site, or 10% on site with 5% through a commuted sum, is not viable and that provision on-site is preferable to an entire delivery off-site.

34 At the present time the applicant considers that the scheme will not be able to support the Croydon Council's preference and London Plan policy requirement for 60% affordable rented and 40% shared ownership. It is currently proposing, subject to a final Viability Appraisal, that the

provision of 42 affordable rented (40%) and 63 (60%) shared ownership units will be deliverable. This offer is not compliant with the London Plan and will need to be fully justified in the viability assessment and be shown to meet Croydon's local housing needs.

Table 2: Affordable housing mix

	Affordable Rent	Shared Ownership	Total Affordable	Total habitable rooms
1 bed/	14	21	35	70
2 bed	16	26	42	126
3 bed	13	17	30	120
Total	43	64	107	316

35 The applicant is proposing that the affordable units will be “pepper-potted” (so as to be tenure blind) in both the East and West buildings and transferred to a Registered Provider. It proposes that both the shared ownership and rented accommodation is provided on the following basis:

i) Affordable rented accommodation:

- Rents fixed at 80% of market rents, uplifted by CPI + 1.5% per annum and market tested every five years;
- No nominations agreement with the Croydon Council;
- Tenants to be identified by reference to a maximum household income level for each unit type (studios, one, two three and four bed apartments); the income levels will be increased in line with CPI + 1.5%

ii) Shared ownership:

- Equity in shared ownership units to be sold at prices equivalent to market values;
- Rents on the balance initially to be set at 3% of the market value of unit times the percentage of the unit unsold; thereafter rents to increase in line with CPI plus 1.5%;
- No nominations agreement with Croydon Council

Scenario testing

36 As part of the proposal's pre-application process, the applicant states in its planning statement that it provided some initial viability modelling, comparing affordable outcomes from the proposed tall building scheme of 917 units against a hypothetical mid-rise scheme. This was based on the acceptance that construction costs per unit for a building of the height proposed are greater than for low and mid-rise developments.

37 The applicant claims that as a result (because after a certain height costs significantly escalate), it will not be readily viable to deliver affordable units against a given, fixed percentage requirement. But by maximising the delivery of housing numbers by quantum, a substantially greater number of affordable units can be delivered (if not by proportion), than from a smaller scale mid-rise scheme.

38 In the scenario testing the mid-rise scheme indicated it could deliver c.23% affordable provision, because it would provide a much smaller number of units overall, the realisable number of affordable housing units would also be much smaller than the proposed scheme. The applicant

argues that as well as delivering less affordable housing, the lower cost, mid-rise scheme would also fail the key policy test in relation to overall housing delivery and not optimise the development potential of the site.

Evaluation of affordable offer

39 The Croydon OAPF guidance is for a minimum requirement of 15% affordable dwellings for the first three years after its adoption. This level of affordable housing has been achieved in three recent tall building approvals within Croydon at Land Adjacent to Croydon College, St Michael's Square and Former Essex House, which had similar (if not identical) challenges to the applicant's proposals. Although the applicant has argued that the initial offer is a reflection of viability issues relating to high development costs and a relatively low value housing market location. It is officer opinion that the support given to increased building height and intensification of development density should be reflected in a minimum OAPF policy compliant provision of 15% affordable housing on site, as a starting point of negotiation rather than the target. This is a reflection of the degree of change in the area including the redevelopment of the Whitgift Centre /Croydon Westfield scheme which will have significant impact on the nature of the site's location and in turn its market desirability and viability of development.

40 The applicant has made reference to a medium height scheme that was tested at pre-application with Croydon Council and GLA officers require a copy of this work before stage 2 to fully understand the arguments relating to affordable housing delivery.

41 The applicant is proposing to 'pepper pot' the affordable housing throughout towers A and B. Whilst it is welcome that on-site delivery is being achieved there is concern of the acceptability of this proposed approach to Registered Providers (RPs) given the service charge and whether this can actually be achieved. The applicant is required to provide evidence from RPs to support this approach and its viability and if this proves unacceptable an alternative arrangement should be established for some on site provision. It is officer opinion that a number of options can be achievable through modifying the existing layouts, but there are concerns how amenity space and child playspace can provided for the on-site affordable units.

42 The applicant's affordable housing viability assessment should be independently reviewed on behalf of Croydon Council and shared with GLA before any revised offer is accepted. Given the schemes sensitivity it is suggested that a meeting should be held between the applicant, Croydon Council officers and GLA officers to achieve an agreed approach to affordable housing provision.

43 There is also concern regarding the affordability of the affordable units as 80% local market rents, in particular whether the larger units will fall within the local housing allowance cap.

44 If a commuted sum for off-site provision is viewed as part of the final option to achieve policy compliant delivery of intermediate and affordable housing, this should be secured within the s106 agreement. Furthermore, Croydon Council should provide details of mechanism by which the commuted sum will be used to provide off-site affordable housing.

Housing density

45 London Plan Policy 3.4 seeks to optimise the potential of sites having regard to local context, design principles and public transport accessibility. The application should be accompanied by an estimate of development density and this should relate to table 3.2 of the London Plan and the PTAL.

46 The site is located in an area of high public transport accessibility with a PTAL level 6b. For central sites with such a PTAL range, the London Plan seeks a density of between 650 and 1,100

habitable rooms per hectare. The proposed residential density for the development is 6,020 hr/ha which substantially exceeds the London Plan benchmark.

47 In this instance the principle of a high-density scheme exceeding the London Plan benchmark has been established for the site by the extant consent. Furthermore, London Plan OAPF policy carried forward by the Croydon OAPF establishes the strategic aim to *‘seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses’* (Policy 2.13)

48 Although a high-density scheme that exceeds the London Plan benchmark is supported, there is an issue in relation to the proposed further increase in density compared to the extant consent. The further increase in site density will need to demonstrate exemplary design quality and compliance with policy guidance in the Croydon OAPF. At present there remains a significant concern with affordable housing provision and residential design quality (as set out below) which until resolved satisfactorily would not justify such high density

Children & young person’s play

49 Policy 3.6 of the London Plan sets out that *“development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.”*

50 The applicant has used the methodology within the Mayor’s supplementary planning guidance to calculate a child yield of 97 children within the development (based on current housing mix).

Table 3: Playspace child yield

Age group	Total Affordable Rent	Total market shared ownership	Total	%
0-4	21.1	27.7	48.8	50.7
4-10	13.3	10.5	23.7	24.6
11-15	7.4	4.2	11.6	12
16-18	3	9.1	12.1	12.5
Total	44.8	51.5	96.2	100

51 The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. Furthermore the SPG sets out the differing types of playspace that it suggests should be required to be provided for new developments to cater for differing age-groups.

52 It is estimated that the scheme will need to provide 730 sq.m. of doorstep and Neighbourhood Playable Space and 240 sq.m. youth space with a total requirement of 970 sq.m.

53 The applicant states that a total of area of 1,095 sq.m. of play space is included in the development with the East tower containing 136 sq.m. internal playspace and 288 sq.m external playspace with West Tower accommodating 330 sq.m. internal playspace and 341 sq.m. external playspace.

54 Whilst playspace provision is identifiable on floorplans for level 4 (East and west towers) and at East tower level 11 and the applicant states that the playspace requirements are exceeded. GLA officers require further assurance on play provision and the applicant should provide more

detail on the play facilities by age group and in with Croydon Council explore whether a financial contribution is required is required for off-site play for the 11+ age group.

55 In this instance given concerns raised in relation to affordable housing the applicant should also confirm whether the amenity spaces and play spaces will be accessible to affordable housing tenants, as the provision needs to be fully inclusive to all tenants. If this is not the case the applicant should provide details of how this provision will be met within the development.

Urban design

Layout and context

56 The development site is located to the east of the Westfield/Whitgift shopping centre which is subject of major redevelopment proposals and to the west of East Croydon Station. A key strategic proposal for this area of Central Croydon is creation of a new east-west linkage between the station and shopping centre incorporating a new footbridge across the railway line. At ground floor level the proposals fit positively with this strategic ambition by bringing forward a pivotal site on Lansdowne Road and the applicant has ensured that the revised ground floor plan has active retail frontages or residential/office lobbies. These provide active edges to the new proposed east-west route as well other surrounding routes, which have been aided by the inclusion of the Voyager site. Notwithstanding this, attention should however be given to how the northern lane edge development is delivered as this is reliant on the cooperation of surrounding landowners and evidence of how the this can be delivered should be provided.

57 The development proposals include a roof top cafe/restaurant with a public viewing deck and the inclusion of these facilities are welcome; given the impact of the development on the Croydon skyline should the benefit of public access to the views from the top of the building should be secured as with other recent tall building proposals and delivered schemes (One Blackfriars, Bishopgate/Leadenhall building and 22 Bishopsgate) the suitable and genuine public viewing access should be secured in the s106 agreement.

Residential quality

58 The development design quality is very high but there is a need for further work on the residential quality.

59 The applicant appears to have taken the previous floor plan for hotel floors in the 64 storey East Tower and converted this into the residential layout. This has resulted in a predominant residential floorplan having in excess of eight units per floor from the cores and has resulted in a high proportion of single aspect studio units whose floorplan appear quite deep and raise issues over the quality of living space. The West Tower raises further concern due to the high proportion of studio units reflecting in the exceeding of eight units per floor from the access core. Whilst it is accepted the benchmark should not be applied mechanistically, the large number of north-east facing studios of varying sizes with deep floorplans appear to show a maximising of unit numbers over floorplan quality. In particular there is a concern that those at lower floors would have particularly poor living environments in terms of light penetration through narrow deep floorplans and the applicant is required to reconsider the removal of some of these units.

60 As stated at the pre-application stage it remains officer opinion that given the substantive increase in residential numbers and density, a scheme of this landmark design quality should aim to achieve the highest residential quality and seek to exceed where possible GLA minimum space standards (policy 3.5/ table 3.3) as has been achieved in other landmark schemes such as at One Blackfriars. The proposals are a step change in tall buildings in Croydon and will be amongst the tallest residential towers in London and the applicant should strive to achieve excellence in the

residential quality of all units. This has yet to be achieved and as it stands the scheme is not supported. These issues must therefore be addressed before the scheme is referred back to The Mayor at stage 2.

Height, Scale and Massing

61 The application proposals are for a part 11, part 37 and part 64 storey scheme and this is a substantive increase in height and massing approach to the extant consented scheme which has part 12, part 16 and part 55 storey massing.

62 The Croydon Opportunity Area Planning Framework identifies three building height areas defined as “central area”, “edge area” and “outer area”. The development proposals are located on a site that is situated in the “central area” – where new tall building are justified and building heights can be maximised. The site is half way between East Croydon and West Croydon railway stations and adjacent to the Westfield development where further c30 storey towers are proposed and will have limited impact on low rise residential buildings other than recent office to residential conversions. The building of this scale can be viewed as the highest point in the central building cluster of Croydon.

63 The inclusion of the Voyager site has allowed a more comprehensive massing approach to be adopted with the addition of a 37 storey tower alongside the landmark 64 storey tower. In the extant scheme this change in height is abrupt and the tower appears isolated, with the proposed scheme the addition of a further tall building alongside the tower gives the scheme a greater balance in its form – especially with other c30 storey towers in adjacent proposed schemes. The increase in building height to 64 storeys does not raise any strategic concern and the introduction of an additional tower alongside is supported.

Public realm interface and amenity space

64 As stated in the layout section it is welcome that the building ground floorplan shows active edges to the surrounding streets and pedestrian routes. The applicant has provided a broad outline of the quality of landscaping strategy, it is however important that given the landmark status of the building that more detail is provide on the landscaping quality and how it is secured. Particular attention should be given to the issues raised by TfL regarding access, design and landscaping.

65 The sequence of podium level amenity spaces both internal and external on the 4 and 11 floors are a welcome feature of the development as is the less substantive space on level 28. The applicant should however provide assurance that these spaces are accessible to affordable housing tenants. Should an alternative arrangement be put in place for affordable housing provision, the applicant should set how amenity space requirements can be met by the design layout on site.

Building articulation/materiality

66 The Design & Access Statement sets out in detail architectural appearance of the building and sufficient information has been provided to understand the rationale behind the adopted elevational design and treatment which is essential for such a prominent landmark building. Key elevational features of the building are as follows:

- The base building and the two towers segue into each other on the West-East elevation. This is most evident on the principal south front addressing Lansdowne Road where two curved bronze fins, projecting 1.65 metres play against each other to form a sweeping composition and the fins define differing projecting elements.

- The south elevation of the two towers is united with the base building into an uneven U-shaped composition.
- To the east, the east tower makes an L shape with the base building.
- The exterior envelope of the building consists of a universal elevation wrapping around the accommodation spaces. On the face are functional external elements that protrude in the form of brises soleil, balconies and winter gardens and where these are not required the external buildings wrapping appears.
- The facade treatment also reflects different uses with the vertical brises soleil of the East Tower and the horizontal brises soleil of the West Tower base defining the offices. Whilst, the residential element to the two towers have balconies or winter gardens to most flats, with amenity terraces for the use of all the residents. These are more fragmented to suggest individual residential character.
- The north facade of the West Tower the core wall is clad in metallic-grey aluminium rainscreen cladding with fine joints. A bronze-coloured strip sits flush in the facade to form an edge to this material.
- A cantilever over sails Wellesley Road at the junction with Lansdowne Road which will act as a marker of the cross route of Lansdowne Road on the long block to the north.
- The appearance of the east and west elevations are emphasised by tall narrow vertical rectangles of glazing.

67 It is officer opinion that the development has a striking appearance and a strong character that a landmark building should achieve. Its emphasis on glass and protruding offset elements and the sweeping ribbon that runs through and 37 and 64 storey towers are very strong features. The base middle and crown are clearly defined and the building responds positively in scaling the lower floors to the streets in its architecture and detailing.

68 It is important that the design quality and external appearance of the tower is not diminished. To meet this requirement and ensure the highest quality of development is achieved, the project architect (CZWG) should be retained throughout the development delivery process. Detailed drawings demonstrating the geometry of reflective glass facade of the tower together with material samples of the glass skin should be provided and agreed upon before final submission and the granting of consent.

Impact on local views

69 The proposed development of a part 37 and 64 storey will have major impacts on Croydon's panoramic views and local views. The applicant has set out a detail analysis of views and provided massing models of the development in context of the wider town centre setting.

70 In assessing the addition of one of the tallest residential tower in London on Croydon's skyline and local views consideration should be given to Croydon's planning history of leading the way in accommodating tall buildings in London. In this context the proposed 64 storey tower is the tallest element and focal point of a new phase and cluster of tall buildings within the centre of Croydon and this is shown in both panoramic and local views. The new cluster will include tall buildings associated with the proposed Croydon Whitgift/Westfield scheme and the completed or approved tall buildings of The Morello Tower (54 storeys), Saffron Square (43 storeys), St Michael's Square (6-44 Station Road), Land West of Croydon College (16 and 38 storeys), Former

Essex House (15 and 31 storeys). It is officer opinion that subject to resolving issues identified the design quality of the tall building design is of a high quality and merits this prominent position.

Heritage

71 London Plan policy 7.8 requires development affecting heritage assets and their settings to conserve their significance by being sympathetic to their form, scale, materials and detail; it also encourages the reuse and incorporation of heritage assets where appropriate. There is also a statutory duty to have specific regard to the desirability of preserving the setting listed buildings and special attention paid to the desirability of preserving or enhancing the character of conservation areas.

72 The principle heritage impact of the proposed 11, 39 and 64 storey development is that the taller elements will impact on the 16th Century Whitgift Almshouses which are a significant heritage asset. The building will appear as the taller of two tower developments that rise above the roofscape of the Grade I listed late 16th Century Whitgift Almshouses on the corner of George Street and North End. Views that are impacted upon are those just south and west of the junction of George Street, North End, Church Street and the High Street; and also from within the central landscaped courtyard, a private open space. These views have already been compromised by the tall c1970s Central House Tower which is clearly visible as a backdrop to the gabled facade of the Almshouses, which may be joined by another tower recently consented on the Westfield/ Whitgift site. The 39 and 69 storey towers proposed as part of this development on Wellesley Road would compound this situation further.

73 Historic England has raised strong concerns that these proposed towers will harm the setting of the Grade I listed almshouses and are seeking a justification for the increase in the height of the towers on the basis of perceived increased public benefits being unable to be delivered without this greater scale. GLA officers however are of the view that the medium-distance backdrop of the Almshouses has already been compromised by high-rise development for over 40 years and this will be compounded by the recently consented scheme of The Westfield/ Whitgift south tower, and by the extant consent for Lansdowne Road site if this project had not been superseded by the current application.

74 The current proposals will result in a greater presence of development above the roofline of the Almshouses than the existing/recently consented schemes, but it would be some distance away and would cause less than substantial harm to their setting when viewed from these positions. The development public benefits also outweigh this impact as the scheme will deliver 917 residential units, a to be negotiate percentage of affordable housing (currently 107 units), open up a new pedestrian route between Westfield and Croydon East Station, provide an active frontage to Lansdowne Rd and Wellesley Road (with new landscaping) and provide Croydon's first public accessible viewing deck given panoramic views of London and the home counties.

Inclusive access

75 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, Deaf, disabled people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

Residential units

76 The applicant's design and access statement demonstrates that all residential units meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% meets

Building Regulation requirement M4 (3) designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users

77 Typical flat layouts and plans of the wheelchair accessible homes have been provided to illustrate the relevant features. It is also clear on plans where the wheelchair accessible homes are located and how many there are. These are distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people, the applicant has excluded studio units from this choice and this is supported.

Public Realm

78 The design and access statement incorporates the principle that disabled people can access each of the entrances safely and that the site is relatively level and no steps or ramps are anticipated as part of the public realm.

79 The setting out of lampposts, trees and other street furniture will be designed so as to be consistent and clear of main pedestrian desire lines which will mitigate the risk of collision by visually impaired users. Contrasted surfacing and tactile blister paving will be used to highlight the vehicular crossing over the pavement area and tactile blister paving will be used to highlight other drop kerb points around the site in compliance with best practice.

80 The applicant design & access statement states that part of the street furniture and seating opportunities will be provided both with formal benches and informal perch opportunities and that the design of the seating will be developed at the detailed design stage but the intention is that seating opportunities will be made available at 50 metre intervals.

81 The upper level amenity spaces are to be design has yet to be developed but it is confirmed that each area will achieve level access from the interior at a single level and will incorporate hard surfacing suitable for a wheelchair user. These areas will also incorporate both formal and informal seating opportunities to allow rest breaks by elderly or mobility impaired users. The applicant should ensure seating includes back and arm rests.

Energy

82 The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

83 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations, although the wall U-value proposed for the non-domestic units exceeds the limiting building regulations value. Other features include low energy lighting with suitable light controls, enhanced or accredited construction details (ACDs) with an overall y-value of 0.04 and provision for smart metering.

84 The demand for cooling will be minimised through solar control glazing, high performance g-value of 0.34, whole-house mechanical ventilation with heat recovery (MVHR) and efficient cooling system. An Overheating Analysis using thermal dynamic modelling has been undertaken to assess the overheating risk within the conditioned areas of the building; its results demonstrate that there is chance of overheating in certain cases. The applicant should investigate further design measures in order to reduce the unwanted solar gains entering the building (i.e. additional shading).

85 The development is estimated to achieve a reduction of 34 tonnes per annum (2%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development. The applicant should further review the proposed 'Be Lean' scheme and model additional passive design measures in order to provide higher carbon savings through passive design and energy efficiency measures alone for both residential and commercial elements of the development. Options that should further be investigated include lower U-values (i.e. floors, walls), and improved efficiencies of the building servicing systems, where possible.

86 The applicant should also provide further information on the construction type for the scheme as ACDs are only currently compatible with traditional methods of construction, such as masonry, and therefore ACDs may not be suitable for the building types on the site. The applicant should also explain the processes in place in order to ensure that achieving this challenging performance level will be possible.

87 The applicant is required to provide information on the light transmittance of the glazing, due to the low g-value proposed, in order to ensure that any visual discomfort issues will be avoided for the residents.

88 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The applicant has also provided evidence of communication with the Croydon Council.

89 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network on the development should be provided. The site heat network will be supplied from a single energy centre. This will be located at basement level as indicated in Figure 5.6 of the Energy Statement.

90 The applicant is proposing to install a 450 kWe gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load. A reduction in regulated carbon dioxide emissions of 342 tonnes per annum (23%) will be achieved through this second part of the energy hierarchy. Further information on the CHP should be provided including the size of the engine proposed (kWth), the thermal and electrical efficiency of the engine, the total space heating and domestic hot water (DHW) demand of the development (MWh annually) and the proportion of heat met by the CHP. The plant efficiencies used when modelling carbon savings should be based on the gross fuel input for gas rather than the net values often provided by manufacturers.

91 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. As the London Plan target has not been met through the previous stages of the Energy Hierarchy, the installation of compatible renewable technologies is strongly supported. The applicant should further investigate the inclusion of solar PV technology in the design and provide a detailed roof plan demonstrating the available roof space that could be utilised for PV installation.

92 Based on the energy assessment submitted at Stage I the energy strategy results in a reduction of 376 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 25%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

Flood Risk and drainage

93 There are wider surface water flood risks within the local catchment area, with significant risks to the west of Croydon town centre, to which drainage from this site will contribute. Therefore the application of London Plan Policy 5:13 will be important.

94 The Flood Risk Assessment sets out that the proposals will reduce surface water run-off by at least 50%. This will be achieved using a combination of green roofs and a rainwater harvesting system.

95 Given the nature and location of the proposed development, this is considered to be an acceptable implementation of London Plan Policy 5:13 and the details should be secured via an appropriate planning condition along the following lines:

‘No development shall commence until a sustainable drainage regime meeting the requirements of London Plan policy 5:13 has been submitted to and approved by the Local Planning Authority in consultation with the London Borough of Croydon Lead Local Flood Authority’.

REASON: To ensure the sustainable management of water and minimise the potential for surface water flooding.

Transport

Dingwall Loop

96 As the applicant is aware and as stated in section 5.6 of the Transport Assessment (TA), TfL has undertaken public consultation on the Dingwall Loop, and received overwhelming support for the proposal. The consultation resulted in the decision to progress with the option to develop a new tram loop via Lansdowne Road and Dingwall Road. The improvements are necessary to provide enhanced resilience to the network and enable TfL to run additional trams which are required as a result of demand created by development in the Opportunity Area, as identified in Table 6.1 and policies 6.1 and 6.2 of the London Plan which seeks to safeguard land for transport. A TWAO application will be submitted in 2016 with construction expected to be complete in 2020. The Loop proposes a new tram stop adjacent to the development at 1 Lansdowne Road and therefore would benefit directly from the enhanced tram service. The concept of a new tram stop supports the high profile destination nature of the proposed 1 Lansdowne Road development, and the proposals are considered mutually compatible. The Dingwall Loop cannot progress without s106 funding from private sector development, and importantly the tram network cannot meet new demand from development without enhancements to the network.

Trip Generation

97 The Transport Assessment is in need of further work and updating to reflect current guidance and best practice, and to ensure that it is reflective of existing baseline and future public transport network conditions. Details of the information required has been sent directly to the council and the applicant in a letter dated 16/03/16. These matters will need to be resolved to the satisfaction of TfL prior to determination, as required by London Plan policy 6.3.

98 It is noted that the proposed development will include a viewing tower similar to that provided at the Shard, London Bridge. The Shard has become a major attractor due to the viewing tower and provision of restaurants in the building. Given that the development proposed at One Lansdowne is taller than the Shard and is proposing to be a similar attraction, the visitor trip generation will need to be taken into account as part of the assessment.

99 Once the additional information has been provided, TfL will be able to advise on the precise impact of the development and how this relates to the cumulative effect of numerous developments coming forward. TfL will then decide on an appropriate package of mitigation measures and financial contributions. However, it should be noted the development is considerable and will generate a high number of associated public transport trips on rail, tram and bus services as well as public realm and cycling.

Car Parking

100 The low level residential parking ratio proposed of less than 0.1 spaces per unit is welcomed by TfL given the highly accessible town centre location. It is understood that 34 spaces, including 28 accessible will be provided at level one, with a further 32 spaces and 28 accessible at level two, providing a total of 66 car parking spaces. This is in accordance with London Plan 6.13.

101 The London Plan Policy 6.13, Table 6.2 requires one Blue Badge space to be provided for every accessible unit, which should be 10% of the overall residential provision. On this basis the London Plan standards require all car parking to be Blue Badge compliant. A Car Parking Management Plan (CPMP) is required to identify how all spaces should meet Blue Badge and Electric Vehicle Charging Points (EVCP) standards, with no other spaces provided. It is stated in the Travel Plan that a CPMP will be implemented and the applicant should ensure this sets out a management strategy for the allocation of spaces, monitors the usage and ensures disabled users of all aspects of the development have access to a Blue Badge bays as required. TfL expects all spaces to be rented rather than sold with individual apartments to allow for further flexibility, this should be secured through the section 106 agreement with the CPMP secured by condition.

102 It is understood that the applicant will provide two years free Car Club Membership for any residents interested in the scheme. Whilst TfL is satisfied with this approach, the s106 agreement should secure a contribution to cover all residential units and measures embedded into the travel plan to promote the scheme and take up of the membership. The Travel Plan also states that separate parking spaces dedicated to the Car Club will be provided, but no additional information is included within the TA. Considering the scale of the development and the high demand for Car Club schemes in this area of Croydon, the applicant should investigate options for providing a Car Club space, either within the development or on street in the vicinity of the site. The provision of an on street bay would obviously have to be agreed with Croydon Council Highways. TfL would also expect the applicant to enter into a section 106 agreement with a clause to exclude all residents from applying for parking permits within the local CPZ.

103 The number of motor cycle parking spaces provided should be confirmed and justified. As stated in the TA, the London Plan does not include any standards for motorcycles. The applicant should ensure these spaces are also included and managed through the CPMP.

Cycle parking

104 The London Plan states that one long-stay cycle parking space should be provided for each studio and one bedroom unit with two parking spaces provided for all other dwellings. One short-stay parking space should also be provided for every 40 units. Cycle parking in accordance with the London Plan is also required for the office and gym aspects of the development, both long and short stay. Therefore, the London Plan requires 1292 long stay residential cycle parking spaces to be provided along with 155 long stay spaces for other uses, not including the 1 space per 8 staff requirement for D1 land use. A total of 73 short stay cycle parking spaces are also required as stated in Table 6.3 of London Plan policy 6.9.

105 The application proposes 1,500 cycle parking spaces to be provided within the site, this includes 1450 long-stay spaces that will be located within the basement and a further 50 short-

stay that will be located within the courtyard area and close to the entrances. However, the TA states that given the high number required, and to ensure the space is well utilised, the provision will be phased with 573 stands provided initially. The usage will then be monitored, with additional racks provided if the parking demand reaches 80%. This is not acceptable to TfL and is contrary to London Plan policy 6.9.

106 Whilst it is understood that 1500 cycle parking spaces requires a large amount of floor space, the proposal to provide only 573 spaces initially is unacceptable to be contrary to London Plan standards and policy 6.9. The applicant should ensure the number of short-stay spaces meets minimum London Plan standards, with long-stay provision increased and plans provided and the spaces/ stands clearly identified on the submitted plans. Additional information should also be provided on the type of storage and it is encouraged that long stay parking areas are split into small sections to increase security.

Access design & landscaping

107 The developer will need to take into account committed and emerging plans for Lansdowne Road, Wellesley Road and key junctions in the vicinity of the site. All works will need to be programmed to enable comprehensive delivery of town centre projects and proposals.

108 It is understood all vehicle access to the site will be from Lansdowne Road, the three existing access points will be replaced by one, which leads into a central area within the development, providing access to the car lifts and servicing area. Whilst the reduction in number of access points is welcomed TfL does have concerns with the gated approach and impact this may have on the highway, traffic flow and implications for the bus and Tram Network, if permitted. The applicant should provide additional plans showing there is sufficient space for cars to wait for street for the gates and car lift.

109 The previous application for this site also included a vehicle access point along Lansdowne Road and loading bay, however the design and location of these has now changed considerably. TfL had incorporated the previous proposals in the original plans for the Dingwall Loop, with access to the development opposite Walpole Road in a fully signalised crossroads. This appears now to have changed location removing this possibility, having implications on vehicle and tram operation along Lansdowne Road.

110 TfL also has strong objections to the 1m high brick planters and trees to be installed on Lansdowne Road as these will be incompatible with the OLE required for tram operation along this road and could also potentially obscure sightlines for vehicles emerging from the access points. In addition the presence of the brick planters and other infrastructure in the footway would appear to necessitate utilities diversions, given the known concentration of utilities in the north footway of Lansdowne Road and east footway of Wellesley Road. Diversion of these utilities, or lack of access to them due to new obstructions placed by One Lansdowne could complicate the utilities diversions required for the Dingwall Loop project. There appears to be a lack of information concerning the utilities diversions and connections that the One Lansdowne project will require.

111 Considering the concerns and points above, and to ensure accordance with London Plan policies 6.1 and 6.3, TfL welcomes further discussions with the applicant on the proposed layout of the scheme and the design of the access points and public realm areas. These matters will need to be resolved to the satisfaction of TfL prior to determination, as required by London Plan policy 6.3.

Travel planning

112 TfL welcomes the draft Travel Plan that has been submitted in support of the application. However, there are differences in key information in the TA and Travel Plan, therefore the final

plan should ensure it reflects the development and any changes. Measures to reduce car usage and encourage sustainable travel have been included but the final plan needs to include targets and more information on how these will be monitored and met. As discussed above the Car Club membership is welcomed and should be embedded into the Travel Plan along with other measures, such as cycle vouchers/free bicycles, marketing and promotional events. The final Travel Plan should then be secured, delivered, monitored and funded through the section 106 agreement. Some further incentives for cycling should also be considered to assist in relieving congestion on bus, train and tram services. These changes will be required to ensure accordance with London Plan policy 6.3.

Delivery Servicing and Construction

113 The scale of development activity projected in Croydon town centre over the next 5 years is unprecedented. An example of where this level of construction activity is taking place is in the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area, and this has required an advanced and highly detailed area wide construction management framework to be developed. This will require commitment from developers to programme their works and to minimise impacts and share construction and servicing information and infrastructure. Further discussions are required in this regard.

114 The draft Delivery and Servicing Plan (DSP) is welcomed, and TfL expects the final DSP, in line with TfL's guidance to be secured by condition. The robust plan should cover all of the points included within the letter to the council. TfL welcomes further discussions with the applicant on these matters to deliver the best option for all parties.

115 The site of the development is adjacent to Lansdowne Road where TfL plans to construct a tramway as part of the Dingwall Loop project. From the planning information submitted, there is a lack of information surrounding construction logistics, site operation, site compound location and timescales for construction. TfL requests more details on these key aspects to fully assess the impact. Further details regarding construction vehicle access, crane management, hording line and any proposed overhang over the highway all need to also be considered in detail by TfL. If both granted permission, it is predicted that the construction timelines of this development and the Dingwall Loop may overlap, so the interface will need to be carefully managed so that both schemes can be successfully facilitated, potentially through a more integrated design approach. As much information as possible is required from an early stage in order to facilitate this.

116 TfL requests a Construction Logistics Plan (CLP), in line with London Plan, is secured by condition and discharged by Croydon Council in consultation with TfL. It is strongly suggested that the plan is prepared through discussions with TfL to ensure the SRN and Tramlink networks are taken into account. Whilst it is understood that detailed construction plans are not known at this stage, TfL requests a draft CLP is provided to set out high level proposals and additional information on the construction plans is provided when available. These matters will need to be resolved to the satisfaction of TfL prior to determination, as required by London Plan policy 6.3.

Conclusion

117 In summary, the TA needs to be updated, including trip generation, committed development, mode share with further justification and revised methodology. Cycle parking should be provided in accordance with the London Plan standards. The Vehicle parking provision including Blue Badge and EVCP should be confirmed, with the CPMP secured by condition. The S106 should include Car Club Membership for all residents, Car Club spaces and restrict residents from applying for parking permits within the local CPZ.

118 Discussions should be held about the Tramlink Infrastructure and Dingwall Loop proposals to ensure compatibility of design and works for both projects can be facilitated. The public realm proposals and vehicle access points also need to be clarified and may need to be reviewed.

119 More information should be provided on the construction plans, phasing and logistics, with the final CLP and DSP secured by condition. The final Travel Plan should be secured through the S106 agreement, along with contributions towards Dingwall Loop and/or other tram and bus improvements for the proposals to comply with the transport policies of the London Plan.

The Mayor's CIL/DIFS

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

121 The Croydon Development Infrastructure Funding Study (DIFS) identified a number of critical transport projects and concluded that there is a significant funding gap that must be filled through a range of funding sources. The Croydon CIL was adopted in 2013 but this only currently allows for collection of funding for specific walking and cycling projects and does not include tram or bus infrastructure. TfL notes that CIL should not be used for mitigation.

122 Given TfL has identified a number of key tram projects in Croydon and in accordance with London Plan policy 8.2, TfL requests that section 106 contributions are also secured in order to help close the funding gap identified in the DIFS. Further discussions with the applicant and the council are requested on the appropriate level of contribution.

Local planning authority's position

123 Croydon Council have raised a number of issues with the application prior to stage 1 report drafting.

Legal considerations

124 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 and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

125 There are no financial considerations at this stage.

Conclusion

126 London Plan policies on housing mix, affordable housing, density, urban design, heritage, play space provision, inclusive design & access, energy, flood risk and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The principle of development of a residential led mixed-use development is accepted given the Croydon OAPF and local plan policy guidance. The increase in the quantum of residential floorspace from that in the extant consent is also supported subject to the scheme achieving a high residential quality and compliance with the affordable housing guidance in the Croydon AAP.
- **Housing mix:** The housing mix is too imbalanced towards studio and one bed unit provision and this has had impacted on residential quality and the applicant should review the current proportion of small units.
- **Affordable housing:** The initial affordable housing offer of c10% on site affordable rent/ shared ownership is too low and it is officer opinion that the support given to increased building height and intensification of development density should be reflected in a minimum OAPF policy complaint provision of 15% affordable housing on site, as a starting point of negotiation rather than the target for the scheme.

The applicant has made reference to a medium height scheme that was tested at pre-application with Croydon Council and GLA officers require a copy of this work before stage 2 to fully understand the arguments relating to affordable housing delivery.

The development proposals are to pepper pot the affordable housing throughout towers A and B. The applicant is required to provide evidence from RPs to support this approach and its viability and if this proves unacceptable an alternative arrangement should be established that includes some on site affordable housing provision.

If a commuted sum for off-site provision is viewed as part of the final option to achieve policy compliant delivery of intermediate and affordable housing, this should be secured within the s106 agreement. Furthermore, Croydon Council should provide details of mechanism by which the commuted sum will be used to provide off-site affordable housing

The applicant's affordable housing viability should be independently reviewed on behalf of Croydon Council before the offer is accepted and the findings should be shared with GLA officers before stage 2 referral.

- **Density:** Although a high-density scheme that exceeds the London Plan benchmark is supported, there is an issue in relation to the proposed further increase in density compared to the extant consent. The further increase in site density will need to demonstrate exemplary design quality and compliance with policy guidance in the Croydon OAPF. At present there remains a concern with affordable housing provision and residential design quality.
- **Playspace:** GLA officers require further assurance on play provision and the applicant should provide more detail on the play facilities by age group and in with Croydon Council explore whether a financial contribution is required is required for off-site play for the 11+ age group.

- **Urban design:** It is officer opinion that the development has a striking appearance and a strong character that a landmark building should achieve.

The ground layout approach is supported but attention should be given to how the northern lane edge development is delivered as this is reliant on the cooperation of surrounding landowners and evidence of how this can be delivered should be provided.

As with other recent tall building proposals and delivered schemes (One Blackfriars, Bishopgate/Leadenhall building and 22 Bishopsgate) the public viewing access should be secured in the s106 agreement.

The residential quality of both towers raises significant concern due to the high proportion of studio units reflecting in the exceeding of eight units per floor from an access core which deep narrow floor plans. In particular the West Tower has a large number of north-east facing studios of varying sizes with deep floorplans appear to show a maximising of unit numbers over floorplan quality. Unless this is addressed officers will be unable to support this scheme.

More detail is provide on the landscaping quality and how it is secured and particular attention should be given to the issues raised by TfL regarding access, design and landscaping.

The sequence of podium level amenity spaces both internal and external on the 4 and 11 floors are welcome. Should an alternative arrangement be put in place for affordable housing provision, the applicant should set how amenity space requirements can be met by the design layout on site.

The project architect (CZWG) should be retained throughout the development delivery process and detailed drawings demonstrating the geometry of reflective glass facade of the tower together with material samples of the glass skin should be provided and agreed upon before final submission and the granting of consent.

The impact on panoramic and local views is viewed as acceptable as it is officer opinion that subject to resolving issues identified the design quality of the tall building design is of a high quality and merits this prominent position.

- **Heritage:** GLA officers are of the view that the medium-distance backdrop of the Almshouses has been already been compromised by high-rise development for over 40 years and this will be compounded by the recently consented scheme on a nearby site, and by the extant consent for Lansdowne Road site if this project had not been superseded by the current application. The current proposals will result in a greater presence of development above the roofline of the Almshouses than the existing/recently consented schemes, but it would be some distance away and would cause moderate rather than substantial harm to their setting when viewed from these positions.
- **Access:** The design & access statement has included the design principles and provided the relevant information requested at the pre-application stage.
- **Sustainable energy:** The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions. It should also provide the requested verification information before stage 2 referral.
- **Flood risk:** The proposed condition relating surface water flooding should be accepted.

- **Transport:** Discussions should be held about the Tramlink Infrastructure and Dingwall Loop proposals to ensure compatibility of design and works for both projects can be facilitated and the public realm proposals and vehicle access points also need to be clarified and may need to be reviewed. The applicant should also respond to points raised on the TA trip generation, construction and delivery plans as requested. Cycle parking and EVCPs provided in accordance with the London Plan should be secured, with Blue Badge provision agreed. Car Club spaces and membership should be included within the s106 along with a robust Travel Plan and contributions towards transport improvements secured before stage 2.

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