

Arcadia House, Cairo New Road
Old Town Croydon, CR0 1XP
in the London Borough of Croydon
planning application no. 15/04748/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

Redevelopment of the site to comprise a new part 4, part 14 storey building containing 113 residential units, an A1/A3/D1 unit at ground floor level and a new public square.

The applicant

The applicant is **Cairo Properties Limited** and the agent is **MRPP**. The architect is **S Williams Architects**.

Strategic issues

The principle of the residential-led mixed use redevelopment of the site is supported. Outstanding strategic issues with regards to **housing and affordable housing, climate change and transport** should, nevertheless, be resolved before the application is referred back to the Mayor.

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 86 of this report; but that the possible remedies set out in the same paragraph could address these deficiencies.

Context

1 On 30 November 2015 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 8 January 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 1C of the Schedule to the Order 2008:

Category 1C

1. 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 triangular application site is located within the Old Town area of Croydon and has frontages to both Cairo New Road and Tamworth Road, with the Wimbledon/Croydon tramline running along the site. The site is currently occupied by Arcadia House, a two storey building currently used as a place of worship with parking to the rear. To the north of the site is another two storey building also used as a place of worship and further to the east on Tamworth Road is a former school building that is locally listed and is now used by the NHS. On the corner of Cairo New Road and Tamworth Road lies a former mission chapel building which is also locally listed with a small green area. Roman Way, an elevated flyover with parking underneath also fronts the site to the west. The site's surrounding buildings comprise retail units, office and some residential homes.

6 The London Plan identifies the site as being part of the Croydon Opportunity Area and Croydon Metropolitan Centre. The site is on the edge of two conservation areas, east and south of the site and is also in the setting of Croydon Minster (Grade I listed).

7 In terms of transport, Roman Way forms part of the Strategic Road Network (SRN) and runs parallel to Cairo New Road. The A232, Duppas Hill Road is the nearest section of the Transport for London Road Network (TLRN), located approximately 500 metres to the south. Reeves Corner Tram Stop is adjacent to the site and West Croydon interchange is located approximately 500 metres to the north east, providing access to several bus routes and national rail services. Consequently, the site has an excellent public transport accessibility level (PTAL) of 6a on a scale of 1 to 6, where 6 is the most accessible.

Details of the proposal

8 The proposal seeks the demolition of the existing building and the construction of a part four, part fourteen storey building, containing 113 residential units, 170 sq.m. of A1/A3/D1 space at ground level, car and bicycle parking and enhanced public realm, including the creation of a new public square.

Case history

9 The applicant site has no relevant strategic planning history, however, the proposal was discussed at pre-application stage with GLA officers on 20 August 2015.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Principle of uses *London Plan; Land for Industry and Transport SPG*
- Mix of uses *London Plan; Town Centres SPG*
- Housing/affordable housing *London Plan; Housing strategy; Housing SPG and draft Interim Housing SPG; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG*
- Urban design *London Plan; Housing SPG; draft Interim Housing SPG*
- Historic environment *London Plan; Shaping Neighbourhoods: Character and Context SPG*
- Tall buildings/views *London Plan*
- Access *London Plan; Accessible London SPG: Achieving an Inclusive Environment*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Transport Functions SPG*
- Parking *London Plan; the Mayor's Transport Strategy*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Croydon's local plan: strategic policies (2013); the saved policies of Croydon's Unitary Development Plan (2006) and the London Plan 2015 (Consolidated with alterations since 2011).

12 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
- Minor Alterations to the London Plan – draft Housing standards and Parking standards (May 2015);
- The Mayor's draft Interim Housing Supplementary Planning Guidance (May 2015);
- Croydon Opportunity Area Planning Framework (January 2013)
- Croydon Old Town Masterplan Supplementary Planning Document (December 2014)
- Croydon's local plan: strategic policies (partial review) and detailed policies and proposals (preferred and alternative options).

Principle of development

13 The site lies within the Croydon Opportunity Area as identified in the London Plan. London Plan Policy 2.13 and Table A1.1 state that the Croydon Opportunity Area is capable of accommodating at least 7,300 new homes and 7,500 jobs up to 2031. As set out in Croydon Opportunity Area Planning Framework (OAPF), the proposed land uses for the southern and northern areas of Croydon where the site lies in, are for 'residential-led with some opportunity for small-scale high street uses where there is a need'. At the local level, the site is identified in the Old Town Masterplan Supplementary Planning Document (SPD) with the objectives to deliver new residential units, re-provide community facilities and create high quality public realm in the surrounding area.

14 The existing site is currently used as a place of worship. A temporary planning permission secured the use of the space for this purpose until January 2015 but has now expired and has

not been renewed. The existing lawful use of the building has therefore reverted to its historic employment use as a factory/light industrial unit with ancillary offices.

Loss of existing social infrastructure

18 London Plan Policy 3.1 states that development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Whilst it is noted that the Old Town Masterplan SPD only requires existing community uses that have permanent planning permission to be incorporated into the future redevelopment of the site or to be provided elsewhere, given the difficulties for worshippers to find suitable premises in London and the Mayor's concern for this issue, the applicant was advised at pre-application stage to help assist the Mountain of Fire and Miracle Ministries, which currently occupy the site, in seeking alternative accommodation.

19 The applicant has acknowledged the Mayor's concern for this issue, and is willing to assist the Mountain of Fire and Miracle Ministries in seeking alternative accommodation in the event of planning permission being granted. This is welcomed and the owner is required to appoint an agent to help the Mountain of Fire and Miracle Ministries relocate somewhere else in the borough. This should be secured by the Council in the S106 agreement.

Release of industrial land

20 The London Plan promotes a rigorous approach to industrial land management to ensure sufficient stock of land and premises is provided to meet the future needs of different types of industry and related uses in different parts of London, including good quality and affordable space. London Plan Policy 4.4 promotes an evidence based approach to reconcile demand and supply of industrial land through three types of location:

- Strategic industrial locations
- Locally significant industrial sites, and
- Other industrial sites (non-designated).

21 At the local level, and based on the historic use of the site which is for employment, the site could be interpreted as falling within the categorisation of a 'Tier 3' Town Centre Industrial Locations under Policy SP3 of Croydon Core Strategy (2013). The designation provides protection for industrial/warehousing activities in order to bring forward opportunities for town centre workshops/studios.

22 The Old Town Masterplan (OTM) which was adopted as a Supplementary Planning Document on 1 December 2014 provides additional site-specific detail and identifies objectives for the Cairo New Road site (OT16) which focus on the delivery of new homes on the site. As the OTM SPD carries *significant weight*, it is therefore accepted that the move away from employment use on the site is in accordance with the development plan. Furthermore, the applicant has carried out a market demand for the existing premises which confirms that there is no realistic prospect of demand for employment use of the existing premises and that, in the absence of redevelopment for a more appropriate use (as is proposed), the existing building is likely to remain vacant or to be used on a short term basis for alternative non-employment purposes, thereby continuing a downward spiral of decline that would conflict with the Council's objective to regenerate and enhance the local area.

23 In determining the application, and in accordance with London Plan Policy 4.4, the Council should take account of the loss of industrial land against the indicative industrial land release benchmark figures set out in the Mayor's Land for Industry SPG for the borough.

Provision of non-residential floorspace

24 In addition to new housing, the applicant has applied for 170 sq.m of flexible A1/A3/D1 floorspace at ground floor level. It is proposed that the unit opens onto a new area of public space that will be created to the rear of the former Mission Hall. The applicant has advised that this use would support the needs of the occupiers of the proposed development and would seek to maximise the effectiveness of the public space, bringing enhanced street level activity and contributing to the new development's sense of place.

25 The inclusion of a D1 use in the proposed location would be supported. Given the size of the proposed unit, the provision of a retail unit would not raise any strategic issues. However, given that the site lies outside of the Primary Shopping Area, the Council should be satisfied with any proposed retail use and the evidence provided by the applicant to justify its location. The applicant has advised the Council that, should officers have a concern about permitting retail floorspace in the proposed location, the applicant would be content to accept a planning condition limiting the use of the unit to A3 and D1 use classes only. This would be supported.

Residential use

26 Strategic policy promotes development capacity for housing in opportunity areas and town centre locations with good public transport accessibility. London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The proposal will contribute towards the delivery of London's housing requirements and the Council's minimum annual housing target of 1,435 homes between 2015-2025 in line with London Plan Policy 3.3. The proposal for 113 residential units is therefore supported in strategic planning terms.

Summary

27 The principle of the redevelopment of the site for a residential-led mixed use development is acceptable in strategic terms, subject to the Council being satisfied with the non-residential element of the proposal.

Housing and affordable housing

28 The application considered here seeks permission for 113 residential units. A detailed housing schedule is provided below:

Unit type	No of apartments	%
studio	32	28
one-bed	30	27
two-bed	43	38
three-bed	8	7
Total	113	100%

Table 1: housing schedule

Affordable housing

29 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units taking into account; the

need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and; the specific circumstances of individual sites.

30 As part of the development it is proposed that just over 15% of affordable housing (by habitable rooms) is delivered on site. The delivery of affordable home on site is strongly supported. A confidential viability appraisal of the scheme has been submitted to the Council, and is being independently assessed by the Council. It is therefore not possible at this stage to comment on the applicant's affordable housing offer and determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12 and the Council's affordable housing policy. The results of the independent report will need to be shared with GLA officers before the application is referred back to the Mayor at stage 2.

31 It is also proposed that the affordable tenure split will be 61.5% rented and 38.5% shared ownership. This is broadly in accordance with the strategic tenure split target established in London Plan Policy 3.10 and is supported.

Housing Choice

32 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority should be afforded to the provision of affordable family homes. Croydon's Core Strategy aspires to 20% of all new homes within Croydon Opportunity Area having three or more bedrooms by 2031 and to 35% of all two bedroom homes providing four bed spaces. At the strategic level, the Croydon OAPF suggests a strategic target of 45% of three bedroom homes across the Southern/Old Town. The Council's Old Town Masterplan SPD also makes clear that the delivery of new family homes and smaller apartments should be the focus of developments at site OT16 Cairo New Road.

33 Table 1 above sets out the scheme's proposed mix of units, which comprises a mix of studio, 1, 2 and 3 bed units. The applicant has advised that its mix of two bed four persons and three bed units, equivalent to 45% of the total units, would be suited to family use. The applicant also advised that given the highly accessible location of the site and current demographic trends, its mix of unit types would meet the needs of single people, couples and families.

34 Given the site's town centre location and accessibility, GLA officers would accept the applicant's proposed mix, subject to the Council confirming that the proposed mix meets local needs.

35 London Plan Policy 3.8 also requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan in line with new national housing standards, the draft Minor Alterations to the London Plan (MALP) proposes to replace this with "ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'". Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with "ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users". In advance of the MALP, a Housing Standards Policy Transition Statement sets out how the existing housing standards should be applied from October 2015. This is also set out in the draft Interim Housing SPG, alongside the other London standards which are not affected by the introduction of national standards.

36 The applicant has advised that all residential units comply with the Lifetime Homes standard, and 10% are wheelchair accessible. The Council should secure M4(2) and M4(3)

requirements by condition, including the submission of a plan to identify which units will be 'wheelchair user dwellings', prior to commencement, to ensure the design of the scheme has considered the standard.

Density

37 As noted in paragraph 7 the site has an excellent public transport accessibility level (PTAL) of 6a and has the characteristics of a central area. The site is also located in the Croydon Opportunity Area. The London Plan density matrix in Table 3.2 suggests in this location a residential density of between 650-1100 habitable rooms per hectare and 140 to 405 units per hectare for this site.

38 The density of the development is 315 units per hectare (or 705 habitable rooms per hectare). The density falls within the guidance range of the London Plan, and is therefore acceptable in principle.

Housing quality

39 London Plan Policy 3.5 and Table 3.3 set out requirements for the quality and design of housing developments. London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Housing SPG. The treatment of London Plan housing standards in relation to new national housing standards is set out above.

40 The residential quality of the proposed units is high. The introduction of a deck access and the limited number of units per core allow all of the units to be dual aspect. The provision of ground floor duplexes with individual entrances is also strongly supported. The applicant was asked at stage 1 to reconfigure the layout of the proposed studios in the tower to improve their residential quality. The applicant has responded positively to this comment and is now proposing to provide studios with external or internal amenity space which overall exceed the Mayor's space standards. This is welcomed. All balconies within the scheme have also been designed to achieve depths of 1,500mm in response to the pre-application discussions. The applicant should confirm that the floor to ceiling height of the units is no less than 2.5 metres in accordance with the Mayor's standard.

Children's play space

41 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. The Mayor's 'Shaping Neighbourhoods: Play and Recreation' SPG requires proposals that include housing to provide 10 sq.m. of playspace per child, with play space for children under the age of 5 on site as a priority.

42 The child yield of the development is estimated at 19, and a play strategy has been developed accordingly to comply with the Mayor's SPG. On-site doorstep play space of 270 sq. m. is to be provided in the residents' garden podium on the first floor and on the roof garden on the fourth floor. The amount of play space for the under 5 exceeds the Mayor's play requirements and is welcomed. The play strategy also shows that off-site play provision suitable for older children is located within 400 metres of the site. This is acceptable. The applicant's intention to create playful design elements through the public realm is also welcomed.

Urban design and historic environment

43 Good design is central to the objectives of the London Plan.

44 The scheme is well developed through significant consultation and design development with the Council. The east/west route through the site is recognised as an important element of the proposals and will contribute to meeting the aspirations of the Council's masterplan and OAPF. The applicant has shown indicative proposals to complete the route in its Design and Access Statement and has committed to working with Croydon Council and key stakeholders to secure the delivery of this route. This is strongly supported. It has been proposed that a shared surface be provided to the access road to enable the future connection through the site from Tamworth Road to Wandle Park. An entrance has also been added at the rear of the taller building in readiness for the improved link. This primary point of access to the tower at ground floor level will animate any future east-west route through the site and will remove the need for residents to traverse across the podium deck to gain access to the tower units. This issue was raised at pre-application stage and the positive response from the applicant is welcomed. As sought during the pre-application discussions, the refuse-related frontage at the base of the tower has also been minimised by incorporating the bin storage area within the fabric of the building, adjoining the undercroft car parking area.

45 The applicant was asked to give further consideration to the New Cairo Road frontage and demonstrate how sufficient privacy levels for ground floor duplex units would be achieved, taking into account the positioning of tram infrastructure including lighting and ticket machines. The applicant has worked closely with the Council to finalise design proposals for this area, taking into account the above. A strip of defensible space is proposed along the length of the units, with landscape planting providing a buffer between it and the tram stop. Each unit will have its own individual access gate, however the design of the paved area in front of the units will enable residents to gain access to their homes in the event of tram stop maintenance works causing obstruction. This is acceptable.

46 The form and massing strategy is supported. The architectural response is high and GLA officers welcome the removal of the brick slips from the lower levels of the buildings to secure the highest standards of architecture and materiality. The final choice of materials and the quality of detailing will have a significant impact on the overall quality in the completed scheme. As such, the applicant is asked to include a commitment to this by including a clause in the S106 agreement that will ensure the same architects, or ones of a similar calibre, are retained to produce all construction drawings or a budget is allocated to allow them to review these when they get produced.

47 In terms of heritage, as mentioned in the site description section of this report, the scheme is in close proximity to a number of heritage assets. A heritage appraisal has been submitted by the applicant assessing the effects of the proposal on the setting of these historic assets. This has been assessed in the context of the relevant statutory tests that are required to be applied, when considering development affecting conservation areas and listed buildings. The appraisal confirms that the proposed development will have less than substantial harm on the setting of relevant heritage assets. The Council should be satisfied that the proposed development would not have a detrimental impact on the setting of the nearby listed buildings.

Inclusive Access

48 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion. The applicant's Design and Access Statement discusses accessibility in terms of Lifetime Homes requirements and wheelchair accessibility. As discussed under 'Housing choice' above, the applicant should provide further detail, and as a minimum it should detail how the proposals respond to Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. The wheelchair accessible units should be identified on floorplans and typical flat layouts

provided. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people.

49 The applicant has advised that the public realm will be accessible to all with step free access and that pedestrians will be given priority over vehicles. This is welcomed.

50 Furthermore, as noted in the transport section of this report, an additional two Blue Badge parking spaces should be provided to comply with the London Plan.

Climate change adaptation

51 A flood risk assessment and drainage statement has been undertaken by Wardell Armstrong. This confirms that the site is within Flood Zone 1 and that the site is at low risk of surface water flooding as the site is at a higher ground level than the surrounding roads and that any surface water flooding will be routed along Cairo New Road, the A236 and Church Road. The area to the south of the development is also an area of open space. The drainage statement states that the volume of attenuation will be increased to 76m³ in the form of tanked attenuation. Whilst tanked attenuation is not the normally preferred method of sustainable drainage, the increase in storage volume is welcomed, especially given the significant surface water risks in the wider local catchment and the applicant has accepted that a suitable planning condition be applied to any planning permission requiring the detail of the sustainable drainage measures to be agreed at a later stage. The application complies with London Plan Policies 5.12 and 5.13.

52 The proposal also incorporates a significant amount of urban greening, including a biodiverse roof. This is in line with London Plan Policy 5.10 and should be secured by condition by the Council.

Climate change mitigation

Energy efficiency standards

53 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and reduced thermal bridges. The demand for cooling will be minimised in the dwellings through brise soleil for shading, dual aspect dwelling design, solar control glazing and louvered ventilation systems to allow secure natural ventilation. The applicant should provide evidence that sufficient analysis has been carried out to ensure that the dwellings are not at risk of overheating. In line with the GLA Guidance on preparing energy assessments it is recommended that overheating modelling is carried out in line with CIBSE guides TM52 and TM49 under current and future climate conditions.

54 For the non-domestic element the applicant should specify how the design has been developed in line with the cooling hierarchy given in Policy 5.9 to reduce the demand for active cooling.

55 The development is estimated to achieve a reduction of 7 tonnes per annum (5%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. Sample DER and TER sheets for the 'be lean' case should also be provided (as well as the Compliance Checklists provided).

District heating

56 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.

57 The applicant is proposing to install a site heat network serving all the apartments in the building. Given that the non-domestic unit is small (170 sq.m.) and is expected to have a very low heat demand, it is accepted in this instance that it will not be connected to the site heat network.

58 The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

Combined Heat and Power

59 The applicant is proposing to install a 35kW 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, as well as a proportion of the space heating. A reduction in regulated CO₂ emissions of 47 tonnes per annum (35%) is claimed through this second part of the energy hierarchy.

60 Further information should be provided on how the heat profiles for the development were derived and how it was estimated that 85% of the heat demand could be met by the CHP, as this proportion seems high for a relatively small, domestic only development.

61 Further information should also be provided on the proposed management arrangements for the CHP and the intended use for the electricity generated. If an Energy Service Company will be engaged, has the applicant made preliminary enquiries to identify a potential partner? The management arrangements should be investigated and established at an early stage as they can have a significant impact on long term financial viability of small scale CHP.

Renewable energy technologies

62 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install an air source heat pump to provide heating and cooling to the small non-domestic unit at ground level.

63 The applicant has also identified that solar PV would be a feasible option but is not proposing to install any. The installation of PV to further reduce the site's carbon emissions would be welcomed.

64 A reduction in regulated CO₂ emissions of 0.1 tonnes per annum (0.07%) will be achieved through this third element of the energy hierarchy.

Summary

65 Overall, it has been calculated that a reduction of 55 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. The carbon dioxide savings exceeds the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Transport

66 The Old Town Masterplan SPD includes aspirations to deliver green and improved tram infrastructure, consideration for a new tram stop on the westbound Wimbledon line and the possibility of turn back facility at the site to enable a higher frequency of trams on the network.

Car parking

67 The application proposes to provide nine Blue Badge parking spaces and no standard spaces. This is welcomed, however for the development to be in accordance with the London Plan one Blue Badge parking space should be provided for every accessible unit. Therefore, an additional two Blue Badge parking spaces should be provided for the development. Sufficient Blue Badge parking should also be provided for the A1/A3/D1 land uses.

68 The applicant's commitment to provide two active electric vehicle charging points (EVCPs) and a further two passive spaces is welcomed and meets the London Plan requirements.

69 The applicant's discussions with Zip Car have concluded that the existing demand in this area and uplift from the development would not be sufficient to make new Car Club space viable. However, each residential unit will be offered 2 years free Car Club membership for the existing schemes in the area. More information on how this will be managed has been requested and the contribution should be secured through the section 106 agreement. The legal agreement should also include a clause to exclude all residents from applying for parking permits within the local CPZ.

Cycle & Pedestrian facilities

70 Whilst the 171 cycle parking spaces are welcomed, additional visitor parking spaces are required. These should be located in an accessible area close to the building entrances. Considering the detailed public realm strategy that has been developed for the area, it is advised that short-stay spaces are included in this. It is also suggested that the long-stay cycle storage is split into smaller section areas to increase security.

71 The applicant's commitment to improve the pedestrian and cycle links through the site and develop the public realm areas is welcomed. The applicant is also encouraged to provide Legible London Signage to further increase sustainable movement.

Public transport

72 The trip generation provided in the transport statement has been assessed and there is sufficient capacity on the existing transport network to accommodate any uplift in trips.

Tram infrastructure

73 TfL is owner of the Tramlink network and has an obligation to maintain safety and protect existing infrastructure assets and safeguarding of future operations. As stated earlier in this report, the Reeves Corner Tramlink Stop is adjacent to the west side of the site and the Croydon Old Town Masterplan identifies this site for Tramlink improvements. As part of the Tramlink upgrade programme, TfL is considering the provision of a Westbound Tram stop at Reeves Corner, opposite the existing stop. TfL is keen to discuss the benefits for the new development and potential construction synergies with the applicant. The issues relating to the construction constraints have been set out in a letter to the Council.

74 As part of the development the applicant proposes to change the layout of the existing Tram stop boundary in order to provide access to the new development. The applicant must ensure that any changes to the landscaping are equal to, if not a higher standard than the existing layout and should meet Tramlink infrastructure requirements. TfL previously requested that the access arrangements to the residential properties be reconsidered to ensure access is not restricted if any works are required to the tram stop. The applicant has now redesigned this area providing a route to all units fronting the tram stop that can be accessed without having to use the tram stop. Plans have been amended to reflect this, and TfL is now satisfied with the access arrangements.

Travel planning

75 The interim travel plan that has been submitted in support of the application is welcomed. Measures to reduce car usage and encourage sustainable travel should be included in the final version, such as cycle vouchers/free bicycles, marketing and promotional events along with subsidised car club membership as mentioned above. The travel plan should then be secured, delivered, monitored and funded through the section 106 agreement.

Delivery, servicing and construction

76 As stated at the pre-application stage, TfL has concerns with construction logistics and these will have to be discussed in detail and agreed with TfL. The preliminary construction management plan identifies a number of concerns and outlines conditions TfL wish to see applied to this site should it progress to construction. However, the plan does not cover information on the height of construction vehicles, such as mobile cranes and any other abnormal vehicle loads that may require Tramlink to cut the current to the Overhead Line Equipment (OLE). Any suspension of the OLE would obviously have significant implications to the Tram operations; these must be discussed and agreed with TfL and form part of the final document. Additional information on the requirements for the final CLP have been sent to the Council in a letter dated 08/12/15 and it is essential construction team considered them in their plans.

77 The construction logistics plan and delivery and servicing plan should be finalised in accordance with TfL's guidance and secured by condition. Both documents should be discharged by the council in consultation with TfL.

Community Infrastructure Levy

78 In accordance with London Plan Policy 8.3, 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).

79 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 allows for collection of funding for specific projects and does not include tram or bus infrastructure. Given TfL has identified a number of key tram projects in west Croydon, TfL requests that a s106 contribution is secured in order to help close the funding gap. Further discussions with the applicant and the Council are requested on the appropriate level of contribution.

Summary

80 In summary, the applicant should enter into discussion with TfL regarding the Tramlink infrastructure safeguarding and proposals. Additional Blue Badge spaces and short-stay cycle parking should be provided. Residents should be excluded from applying for parking permits through the legal agreement, along with Car Club membership and the final travel plan. A contribution towards strategic tram improvements is also required in accordance with the DIFS study. The final CLP should be agreed with TfL and secured by condition along with the DSP for the proposals to comply with the transport policies of the London Plan.

Community Infrastructure Levy

81 The site is also in the central London area where section 106 contributions for Crossrail will be sought, in accordance with London Plan Policy 6.5 and the associated SPG 'Use of planning obligations in the funding of Crossrail' (April 2013). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability, and this should be reflected in the wording of the section 106 agreement.

Local planning authority's position

82 It is understood that officers at Croydon Council are broadly supportive of the scheme.

Legal considerations

83 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.

84 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

85 There are no financial considerations at this stage.

Conclusion

86 London Plan policies on the principle of development, urban design and inclusive design, climate change and transport are relevant to this application. Whilst the application is supported in principle, however, the following issues should be addressed:

- **Principle of development:** The principle of the redevelopment of the site for a residential-led mixed use development is acceptable in strategic terms, subject to the Council being satisfied with the non-residential element of the proposal. The Council should take account of the loss of industrial land against the indicative industrial land release benchmark figures set out in the Mayor's Land for Industry SPG for the borough. The applicant is required to assist the Mountain of Fire and Miracle Ministries find an alternative accommodation; this should be secured through the s106 agreement.
- **Housing and affordable housing:** It is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12. The Council should confirm it is satisfied with the proposed mix of units and secure Building Regulation M4(2) and M4(3) requirements by condition.
- **Inclusive design:** Further information should be provided on the wheelchair user dwellings.
- **Climate change adaptation:** The proposed climate change adaptation measures should be secured by condition.
- **Climate change mitigation:** The carbon dioxide savings exceeds the London Plan targets, however, further information should be provided on overheating and cooling, the proposed energy centre and CHP and to demonstrate the energy efficiency savings claimed. The installation of PV would be welcomed.
- **Transport:** The applicant should enter into discussion with TfL regarding the Tramlink infrastructure safeguarding and proposals. Additional Blue Badge spaces and short-stay cycle parking should be provided. Residents should be excluded from applying for parking permits through the legal agreement, along with Car Club membership and the final travel plan. A contribution towards strategic tram improvements is also required in accordance with the DIFS study. The final CLP should be agreed with TfL and secured by condition along with the DSP for the proposals to comply with the transport policies of the London Plan.

For further information, contact GLA Planning Unit (Development & Projects Team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Hermine Sanson, Senior Strategic Planner

020 7983 4290 email hermine.sanson@london.gov.uk
