

PART 6: Development Presentations

1 INTRODUCTION

- 1.1 This part of the agenda is for the committee to receive presentations on proposed developments, including when they are at the pre-application stage.
- 1.2 Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
- 1.3 The following information and advice applies to all those reports.

2 ADVICE TO MEMBERS

- 2.1 These proposed developments are being reported to committee to enable members of the committee to view them at an early stage and to comment upon them. They do not constitute applications for planning permission at this stage and any comments made are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
- 2.2 Members will need to pay careful attention to the probity rules around predisposition, predetermination and bias (set out in the Planning Code of Good Practice Part 5.G of the Council's Constitution). Failure to do so may mean that the Councillor will need to withdraw from the meeting for any subsequent application when it is considered.

3 FURTHER INFORMATION

- 3.1 Members are informed that any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in an Addendum Update Report.

4 PUBLIC SPEAKING

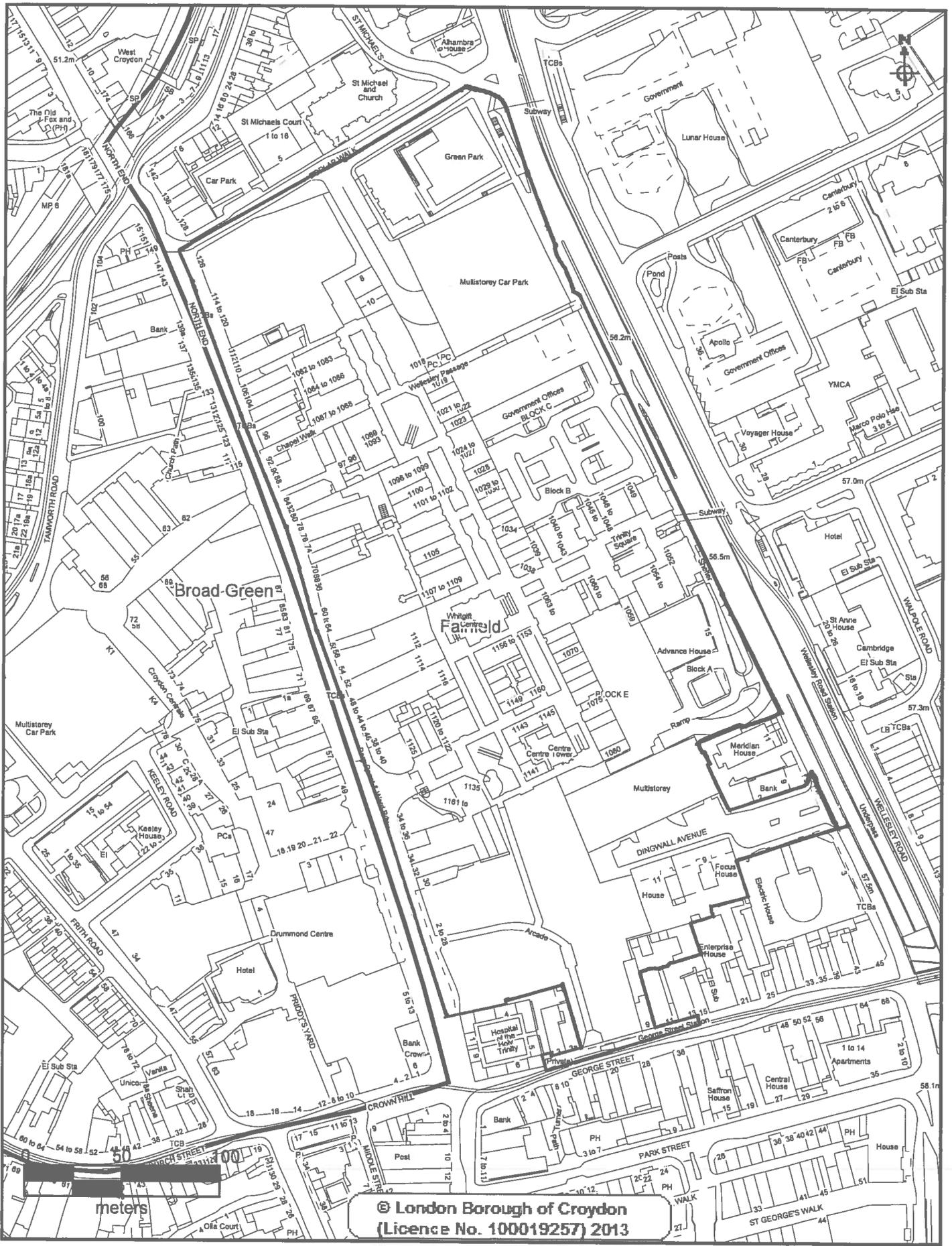
- 4.1 The Council's constitution only provides for public speaking rights for those applications being reported to Committee in the "Planning Applications for Decision" part of the agenda. Therefore reports on this part of the agenda do not attract public speaking rights.

5 BACKGROUND DOCUMENTS

- 5.1 For further information about the background papers used in the drafting of the reports in part 8 contact Mr P Mills (020 8760 5419).

6 RECOMMENDATION

- 6.1 The Committee is not required to make any decisions with respect to the reports on this part of the agenda. The attached reports are presented as background information.



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21-Mar-2016



1 DETAILS OF THE DEVELOPMENT

Ref: 16/01001/PRE
 Location: Whitgift Shopping Centre and Surrounding Land, Croydon
 Ward: Fairfield
 Description: Proposed comprehensive retail-led development to include leisure, offices, community facilities, new residential units (up to 1000) and enhanced public realm and infrastructure improvements.
 Drawing Nos: Pre-application submissions to date.
 Applicant: Croydon Limited Partnership
 Agent: Quod
 Case Officer: Helen Furnell

2 BACKGROUND

- 2.1 The latest draft development plans for the Whitgift Shopping Centre and surrounding land are being reported to Planning Committee to enable Members to view them at an early stage and to comment upon it. These latest development plans do not constitute an application for planning permission at this stage. Comments made upon it at this stage are thus provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
- 2.2 These pre-application discussions follow the granting of outline planning permission in February 2014 for 'Mixed use development of the site through the demolition, alteration refurbishment and retention of existing buildings/structures and erection of new buildings/structures to provide a range of town centre uses including retail and related uses (use class A1-A5) leisure (use class D2) residential (use class C3) community facilities (use class D1) office (use class B1) open space and public realm; vehicular bridge links; alteration of existing and creation of new basements, underground servicing and multi storey car parking; alteration to existing and creation of new vehicular and pedestrian access into the site; utility and energy generation facilities; infrastructure and associated facilities together with any required temporary works or structures required by the development'.
- 2.3 The pre-application discussions in relation to the latest development plans are a result of further scheme development and are detailed below. The scheme continues to evolve and is work in progress. This report has been drafted on the basis of plans presented to officers on 7th April 2016. A new planning application would be lodged for this scheme once pre-application discussions have been concluded.

3 SUMMARY

- 3.1 As with the previous consented application, the pre-application latest plans presented comprise the comprehensive redevelopment of the Whitgift Shopping Centre and surrounding land which would, in overall terms, bring significant economic, social and environmental benefits to Croydon. The latest plans do have a number of positive elements when compared to the consented application but officers nonetheless consider that there are a number of unresolved issues in relation to the latest plans (as set out in this report) which do need to be addressed and resolved in on-going dialogue with the developer. Further discussions are thus required with the developer to satisfactorily resolve these matters which will then be reflected in an overall planning balance assessment when the application is determined.
- 3.2 The consented scheme established that the redevelopment of the Whitgift Shopping Centre in that form would bring significant economic, social and environmental benefits and would create a step change for the vitality and viability of Croydon Metropolitan Centre, supporting the regeneration objectives of the Council. These latest plans for the development continue to be a major mixed-use, retail-led regeneration of a large area of the town centre. On the basis of the information seen to date, it is anticipated that the latest plans would be consistent with the Council's aspiration for comprehensive regeneration across a large part of the Retail Core and the benefits that such development would bring. Whilst the full net benefits come down to the specifics of the proposal (which are discussed further in the sections below), it is clear that the nature and scale of the development proposed would result in significant economic, social and environmental benefits in overall terms, though the scheme needs to be acceptable in massing, design and other terms as set out in this report.
- 3.3 As discussions for a revised scheme at this site are still at an early stage, retail and leisure floorspace, and residential unit numbers and the mix of residential units, have not been finalised. However, the developer has indicated that the amount of overall floorspace and the numbers of residential units would increase in comparison to the consented scheme. This is in part due to the fact the site area has increased to include the site of Green Park House on the corner of Wellesley Road and Poplar Walk. The current proposals are also indicating the demolition of buildings that were previously to be refurbished, in particular the Whitgift Car Park and the Marks and Spencer store. The proposal also includes additional height in some areas. There would be additional retail and leisure floorspace within the proposal. These uses are acceptable in this location as acceptable town centre uses.
- 3.4 The proposal would provide much needed housing in the Croydon Opportunity Area (COA). The potential increase in the number of residential units up to 1,000 (up from 400 to 600 units in the consented application) is in line with the OAPF. As with the approved application there is a desire for the residential element to be brought forward as soon as possible. It will be necessary to make provision regarding the delivery of the residential element (including affordable housing) within a section 106 agreement associated with any future planning

application. Discussions around the level of affordable housing are yet to take place and the developer has not yet appointed a Residential Provider (RP).

- 3.5 On the basis of the current draft plans, issues of concern set out in this report include a significant increase in massing proposed in the latest plans and resultant concern as to the impacts of this additional massing on heritage assets in particular, for example as the Almshouses and St. Michaels and All Angels Church, and in relation to the Central Croydon Conservation Area.
- 3.6 Other key principles forming part of the existing approved scheme (such as 24 hour pedestrian east-west route and two secondary east west routes, high quality public realm on Wellesley Road and the creation of a vibrant urban block lined with active frontages incorporating residential at upper floors) are also issues which need to be resolved satisfactorily. . In addition, officers also consider that, at present, the design approach requires further work to demonstrate to articulate an appropriately balanced and informed relationship between the retail and residential aspirations of the proposal and the wider aims and aspirations for the Opportunity Area and Croydon as a Metropolitan Centre. Continued discussions are required with the developer in this respect to resolve these issues.
- 3.7 As members are aware, the redevelopment of the Whitgift Centre is a very important development for the future of Croydon. A clear progression of the commitment to strong place-making and integration of the scheme as a high quality new piece of the town, including an appropriate relationship with affected heritage assets, is key to the acceptability of these latest plans. Further discussions with the developer will continue.

Outstanding Questions and Way Forward

- 3.8 It is perhaps useful to focus Planning Committee discussion around the following matters:
 - The height of the proposed development and its relationship with the Almshouses, other heritage assets and the impact on other views.
 - The height of residential development on the site of Green Park House and its impact on St Michaels and All Angels Church.
 - The removal of the existing Marks and Spencer building and the form of its replacement in the context of it being assessed as a positive element of the Conservation Area in the Conservation Area Appraisal and Management Plan (CAAMP).
 - Changes to the highway layout on Wellesley Road and revised access arrangements, also affecting the layout of Poplar Walk.
 - The character and quality of the public realm along Wellesley Road and how the proposals contribute to the creation of a new urban space that signals a step change in Croydon.

- The form of the 24 hour east-west route, including the extent of openness, roof glazing, development above it, its role as an important route within the town centre, how level changes on site are dealt with and the introduction of doors at either end.
- The appearance of the residential element on Wellesley Road and how the retail element appears behind it (including the visual impact of the car park ramps).
- The importance of the roof or 'fifth elevation', the need to minimise rooftop clutter and the integration of amenity and biodiversity.
- Phasing of the development: including the phasing relationship of the retail/leisure and residential elements and the extent to which the two elements will be constructed together, including the implications for townscape due to any time lag between the retail/leisure element being constructed and the residential element being constructed.

3.9 Initial commentary on these various points would help inform the on-going dialogue and the significance of the various issues. Officers and the applicant are operating to a tight timeframe and it is the current intention that a further pre application presentation will take place in June 2016 (following further design review, dialogue around planning obligations, further consideration of highway modelling, EIA scoping, related visual impact and heritage assessment, fixing the maximum parameters and drafting of detailed design guidelines).

4 PROPOSAL AND LOCATION DETAILS

Proposal

4.1 The development as proposed is as follows:

- Redevelopment of the Whitgift Shopping Centre and associated office towers, Marks and Spencer, Green Park House and all car parks on the site. The site area has increased from the approved scheme as it now includes the site of Green Park House.
- Provision of a retail led redevelopment with approximately 30,000 square metres additional retail floorspace in comparison to the approved scheme.
- Provision of up to 1,000 residential units (in comparison with 400 to 600 units previously approved). Whilst the form of the residential provision is still to be finalised, there is the possibility of the provision of student accommodation and/or a hotel.
- Provision of a cinema with an IMAX screen or similar offer. This requires additional height to the proposed cinema box beyond the approved scheme.
- Demolition of all car parks on the site, with all car parking now proposed at roof level within one connected car park, rather than two separate car

parks. Car parking is also now proposed above the department store. Final car parking numbers have not been confirmed and negotiations are taking place to fix the parking numbers. The latest proposal by the developer is for a maximum of 3,140 spaces. (The approved scheme had 3,140 car parking spaces with a further 360 car parking spaces being made available 20 days per annum (peak time)).

- Changes to the highway layout on Wellesley Road and Poplar Walk and vehicular access to the site. The approved scheme provided for the northern access to the site off Poplar Walk. This is now off Wellesley Road and requires a southbound right hand turn and the introduction of a new stop line on the northbound carriageway. The proposal also involves the removal of the existing car park ramps on Poplar Walk. The delivery and servicing exit has also been moved from Poplar Walk to an enlarged southern entrance on Wellesley Road.
- Demolition and replacement of Marks and Spencer in an alternative location. The approved scheme was for the refurbishment of the existing store, though the option of demolition and replacement of Marks and Spencer was covered in the CPO inquiry.
- 24 hour east-west pedestrian route proposed with doors at either end (facing North End and Wellesley Road).
- An area of public realm is proposed at the northern end of the site fronting on to Poplar Walk.

4.2 As with the approved scheme, it is intended that the development will be proposed in outline (with access points in detail) and the expectation is that an outline planning application will be submitted later this year. It is envisaged that the application will be a parameter based application.

Site and Surroundings

- 4.3 The Whitgift Shopping Centre is bounded by North End to the west, George Street to the south, Poplar Walk to the north and Wellesley Road to the east. The site comprises the majority of the land within these road boundaries, with the exception of all properties fronting George Street (apart from Allders and 9a George Street), a number of properties along North End and Meridian House, the HSBC building and Electric House on Wellesley Road. It now includes the site of Green Park House. The maximum length of the site (from Poplar Walk to George Street) is 460m and depth (from North End to Wellesley Road) is 190m and the site area covers approximately 7 hectares.
- 4.4 The majority of the site is located within the Primary Shopping Area of Croydon Metropolitan Centre as defined on the Croydon Local Plan Policies Map. As a result, the site is currently occupied by a variety of town centre uses, primarily consisting of the Whitgift Shopping Centre, the former Allders department store, a number of largely vacant office buildings and associated car parking.

- 4.5 The Whitgift Centre (including the former Alders Department Store) provides approximately 128,068 sqm GIA of retail floorspace arranged over two floors, with approximately 41,885 sqm GIA of office space made up of five tower blocks of various heights between 10 and 24 storeys above the shopping centre. The retail offer includes a range of uses from fashion, cosmetics and furnishing to food outlets. Marks and Spencer and the former Alders anchor in the centre to the north and south respectively.
- 4.6 There are three car parks on site: Whitgift Car Park (to the north accessed from Wellesley Road with egress onto Poplar Walk), Whitgift Open Air Car Park (located centrally with access and egress from Wellesley Road) and the former Alders Car Park (to the south of the site with entry and exit from Dingwall Avenue). There are currently 2,142 car parking spaces within the site. The main pedestrian accesses are from North End, George Street and Wellesley Road, whilst there is a narrow access from Poplar Walk beside M&S.
- 4.7 The existing Green Park House, which is a vacant, ten storey office block, would be demolished. It currently provides approximately 7,100 sqm of office space.
- 4.8 Poplar Walk to the north of the site is a part one-way part two-way road that runs between North End and Wellesley Road. Directly opposite the site lies Poplar Walk Car Park, St Michaels Court (4 storey residential building) and beyond the Parish Church of St Michael and All Angels, a Grade 1 Listed Building. Green Park House, on the junction between Poplar Walk and Wellesley Road is a tenstorey office building, with an area of open hard surfacing next to it.
- 4.9 Wellesley Road (A212) to the east of the site forms part of the strategic network and is a dual carriageway with an underpass to the south under George Street. The area beyond is characterised by medium to high rise office/residential buildings, such as Government Offices at Lunar House (22 storeys) and Saffron Square (44 storeys) which is currently under construction. Planning permission has recently been granted at 1 Lansdowne Road for a part 55 storey mixed use building.
- 4.10 George Street to the south is a one-way street characterised by a continuous line of mainly four storey buildings with retail uses at ground floor. Trams run along George Street. The Hospital of the Holy Trinity (Whitgift Hospital), a Grade 1 Listed Building, is located on the junction between North End and George Street.
- 4.11 North End to the west of the site is Croydon's primary pedestrian street with retail uses on either side, characterised by mainly 4 storey buildings. Centrale, a modern enclosed shopping centre, lies opposite the main entrance to the Whitgift Centre from North End.
- 4.12 The application site is located within the Croydon Metropolitan Centre and an Opportunity Area, within an Area of High Density as identified on the Croydon Local Plan Policies Map. The western side of the application site is designated a primary shopping area and contains mainly retail frontages. The southern

portion of the site lies within an Archaeological Priority Zone. The majority of the site lies within the Retail Core as identified in the Opportunity Area Planning Framework (the area that includes Centrale, North End, the existing Whitgift Centre site and former Alders store and the land to the east extending to Wellesley Road).

- 4.13 The properties along the North End and George Street frontages are within the Central Croydon Conservation Area. There are two Grade 1 Listed buildings in close proximity as described above. The Electricity Showrooms and Offices located on the corners of Wellesley Road and Dingwall Avenue are Grade 2 Listed (Wellesley Road) and there are a number of locally listed buildings along North End and George Street. There are two UDP designated local views along North End looking south towards the Croydon Clocktower landmark and along George Street looking east towards the NLA Tower.
- 4.14 The application site has a public transport accessibility level of 6b, which is the highest accessibility rating. The site is located approximately 400 metres west of East Croydon Station and 90 metres south of West Croydon Station. Wellesley Road is part of the Strategic Road Network for which TfL has the traffic management duty. George Street is a Local Distributor Road. The Park Lane Gyratory, approximately 300 metres to the south of the site, is also part of the Transport for London Road Network. The tram network runs along the Wellesley Road and George Street.
- 4.15 The Council's West Croydon Masterplan area lies to the north of the site, the East Croydon Masterplan to the east and the Mid Croydon Masterplan area to the south.

Planning History

- 4.16 It should be noted that there is extensive planning history across the site and surrounding area, so not all are highlighted below. The following previous planning decisions are relevant or provide some relevant context:
- 4.17 60/1885/P Demolition of existing school buildings and erection of office, shops, restaurant, drive in bank, multi-storey garages and lock up garages.
- Outline planning permission granted in February 1962.
- 4.18 63/0171/P Erection of offices, shops, restaurant, multi-storey garage and car park.
- Permission granted in March 1963.
- 4.19 63/0584/P Erection of offices, shops, restaurant, multi-storey garage and car park.
- Permission granted in February 1963.
- 4.20 64/1578/P Erection of multi-storey car park and shops.
- Permission granted in August 1964.

- 4.21 85/01780/P Erection of additional shopping units and specialist food court, enclosure of open shopping areas, alterations to pedestrian circulation and external finishes. This was the first phase of the Whitgift Centre enclosure.

Outline planning permission granted in December 1985.

- 4.22 86/01487/P Erection of additional shopping units and specialist food court, enclosure of open shopping areas, alterations to pedestrian circulation and external finishes. This was the reserved matters pursuant to 85/01780/P.

Permission granted in September 1986.

- 4.23 91/02028/P Refurbishment and enclosure of open shopping areas to North End, south, north, east and west arcades and Whitgift Square, erection of four storey building within Whitgift Square comprising retail units and restaurant/café facilities, use of first floor of Rothschild House for retail purposes and erection of two storey extension to Southside of North End Court for use as retail and restaurant/café.

Permission granted in February 1992.

- 4.24 92/01841/P Refurbishment and enclosure of Whitgift Centre between Rothschild House and North End to include the provision of additional floorspace for purposes within use classes A1 and A3, installation of new escalators, lift and stairs and provision of new entrance feature onto North End.

Permission granted in January 1993.

- 4.25 93/00207/P Extension of basement area to provide retail/storage areas.

Permission granted in April 1993.

- 4.26 95/00646/P Amendment to permission 91/2028/P and 92/0184/P to include extension of glazed roof area to south arcade mall, reduction in height to roof lightwell parapets, new entrance canopy and 2 additional glazed signs to Bishops Court.

Permission granted in July 1995.

- 4.27 01/02116/P Demolition of existing car park between office Blocks B and C on Wellesley Road and associated vehicular access ramp; erection of a five storey extension to the Whitgift Shopping Centre to provide new retail units and extensions to existing shop units at levels 0,1 and 2 comprising a total retail floorspace of 7830sqm, formation of new entrances to office Blocks B and C onto Wellesley Road; alterations to vehicular access and provision of access ramp to serve 255 parking spaces at levels 3 and 4; provision of associated servicing arrangements.

Permission granted subject to a section 106 agreement in December 2004.

This was not implemented.

4.28 12/1518/DT The Council issued a scoping opinion in July 2012 setting out its view of the matters to be covered in the environmental statement.

4.29 13/02536/P Continued use of part of former Alders store for purposes within class A3 (restaurant and cafe) and A5 (hot food take away); siting of extract ducting on frontage.

Permission granted in May 2014

4.30 13/02537/P Continued use of part of former Alders store for purposes within class A3 (restaurant and cafe) and A5 (hot food take away); siting of extract ducting on frontage.

Permission Granted in May 2014

4.31 12/02542/P - Mixed use development of the site through the demolition, alteration refurbishment and retention of existing buildings/structures and erection of new buildings/structures to provide a range of town centre uses including retail and related uses (use class A1-A5) leisure (use class D2) residential (use class C3) community facilities (use class D1) office (use class B1) open space and public realm; vehicular bridge links; alteration of existing and creation of new basements, underground servicing and multi storey car parking; alteration to existing and creation of new vehicular and pedestrian access into the site; utility and energy generation facilities; infrastructure and associated facilities together with any required temporary works or structures required by the development

Permission granted subject to a section 106 agreement in February 2014

4.32 12/02543/CA - Demolition of no 5 and no 9a George Street and nos 2-30 North End but with retention of the building facades at no 5 and no 9a George Street and at nos 2-30 North End; demolition of buildings at no 7 George Street and nos 42, 44-46, 48-50, 52, 54 and 56 North End including walls and fences and part of the rear of no 34 North End/units 135-137 of Whitgift Centre; creation of basements beneath buildings at nos 38-40, 94, 108 and 114-126 North End and no 9a George Street

Consent granted in February 2014

4.33 14/05321/DT - Mixed use development of the site through the demolition, alteration refurbishment and retention of existing buildings/structures and erection of new buildings/structures to provide a range of town centre uses including retail and related uses (use class A1-A5) leisure (use class D2) residential (use class C3) community facilities (use class D1) office (use class B1) open space and public realm; vehicular bridge links; alteration of existing and creation of new basements, underground servicing and multi storey car parking; alteration to existing and creation of new vehicular and pedestrian access into the site; utility and energy generation facilities; infrastructure and associated facilities together with any required temporary works or structures required by the development (amendment to planning permission 12/02542/P)

4.34 Approved in January 2015

96-98 North End and Chapel Walk Entrance to Whitgift Shopping Centre

4.35 14/02824/P - Demolition of existing buildings; creation of enhanced entrance and mall environment

Permission granted in December 2014

Park Place

4.36 99/02350/P Demolition and partial demolition of existing buildings; erection of a four level department store fronting Katharine Street and High Street (on the site of 15-37 (odd) High Street and 1-14 Katharine House); erection of a three level shopping mall with internal mezzanine levels comprising approx 110 units (located between the proposed department store and the Whitgift shopping centre) comprising 75,069sqm of retail floorspace; 7567sqm of A3 (Food and Drink) and 4176sqm of ancillary office floorspace to include part closure of Park Street and St Georges Walk; part demolition, refurbishment and facade retention of nos 2-38 and 3, 3a and 9a George Street; rebuilding of facade at 5-5a George Street on site of 7-7a George Street and retention of existing Allders facade on North End; construction of a glazed pedestrian bridge across George Street and section of mall below George Street; Erection of 5 level extension for office use to St George's House and extension of existing podium frontage on Park Lane; internal and external alterations to Segas House for use as offices with ancillary facilities to include installation of glazed pedestrian link to St George's House and formation of courtyard square at rear; highway alterations including remodelling of existing roundabout at junction of Barclay Road and Park Lane, the pedestrianisation of High Street between George Street and Katharine Street to include the formation of a landscaped civic square, the closing off to traffic of part of Katharine Street with consequent landscaping; construction of a covered bus interchange between Katharine Street and Park Street; construction of a 10 level car park with basement level ingress from Smiths Yard and egress via a tunnel link onto Fell Road; provision of servicing areas in High Street and Dingwall Avenue.

Permission granted subject to a section 106 agreement in May 2004.

This was not implemented.

4.37 99/02352/P Partial demolition of 2-14(even) 20-34 (even) and 3, 3a, 9a George Street involving retention of facades; demolition of remainder of buildings involving reconstruction of facade at 5-5a George Street on site of 7-7a George Street.

Conservation area consent granted August 2000.

This was not implemented.

4.38 01/0984/CA Demolition to the rear of 11-17 George Street; demolition of 29-31 Park Street and boundary features to the front of 15 Park Street.

Conservation area consent granted May 2002.

This was not implemented.

Bishops Court

- 4.39 00/01912/P Demolition and partial demolition of existing buildings including multi-storey car park in Dingwall Avenue; erection of a four level department store with basement, storage and servicing facilities (located between George Street and the Whitgift Centre); erection of two level shopping mall with mezzanine level (located between North End and the Whitgift Centre) comprising a total gross retail floorspace of 62,773sqm; part demolition, retention, refurbishment and relocation of facades at no.s 3- 13 (odd) George Street and retention of Allders facade fronting North End; formation of entrance square in George Street; provision of 3 level car park above department store comprising 660 parking spaces, accessed via a ramp from Dingwall Avenue; provision of servicing facilities at basement level accessed via the Whitgift shopping centre and Dingwall Avenue; provision of parking facilities for the Almshouses and cycle bays in George Street and North End.

Permission refused April 2003.

- 4.40 00/1913/CADemolition of parts of 3, 3a George Street; demolition of 5 George Street with the relocation of its facade to the site of 7 George Street; substantial demolition to the rear of 9a 11,11a & 13 George Street.

Conservation area consent refused April 2003.

- 4.41 03/03064/P Demolition and redevelopment, with a gross floor area of 46,039sqm, to provide a new department store, two storey shopping mall and 9 flats, including alterations to the Dingwall Avenue car park to provide 529 parking spaces; retention of the North End 'Allders facade', demolition of 5-9 George Street and relocation of part of the George Street frontage; demolition of the rear parts of George Street buildings and alterations and relocation of the George Street tramstop (Bishop's Court at the Whitgift 2).

Appeal contested and dismissed October 2005.

- 4.42 03/3063/CA Demolition of no 9 George Street partial demolition of 3,3a,5,7,9-13a George Street at rear buildings and relocation of facade of 5-7 George Street to the position of no 9.

Appeal contested and dismissed October 2005.

Drummond Shopping Centre

- 4.43 98/02558/P Demolition of existing buildings and erection of 37,676sqm of retail floorspace, 1,323sqm of A3 (food and drink) floorspace and 2,991sqm of leisure use floorspace (bingo hall) in a multi-level building with pedestrian malls linking North End, Tamworth Road and the existing Drummond Centre Mall together with 990 public car parking spaces; alterations to and closure of

existing public highways and footpaths and the formation of new roads and footpaths

Permission granted subject to a section 106 agreement in August 1999.

This was implemented.

Centrale Shopping Centre

- 4.44 11/00372/P Partial demolition of the existing building; erection of a three storey building with basement/mezzanine levels; alterations to the existing and use of the new units for mixed use purposes comprising D2 (assembly/leisure), A1 (retail), A3, (restaurants and cafes) and A5 (hot food take-aways); erection of new glazed roof over central link

Permission granted subject to a section 106 agreement in November 2012.

This has not been implemented.

- 4.45 15/05790/P – Installation of roof plant

Permission granted in February 2016

- 4.46 16/00356/LP - Infilling of voids at upper floor level and use for purposes with class A1

- 4.47 Lawful Development Certificate issued 23 March 2016 16/00926/P - Use for purposes within class D2 (Unit 34)

Application under consideration

5 MAIN PLANNING ISSUES AND MATERIAL PLANNING CONSIDERATIONS

- 5.1 The main planning issues raised by the development that the committee should be aware of are:

1. Assessment against Development Plan policy and the OAPF
2. Status of Croydon as an Opportunity Area and Metropolitan Centre
3. Principle of Development
4. Townscape and Visual Impact
5. Heritage Assets
6. Transportation, Access and Parking
7. Public Realm and Landscaping
8. Local Impact
9. Impact on Future Occupiers
10. Phasing
11. Sustainability and Energy
12. Environment
13. Other Planning Matters
14. CIL and S106 Agreement
15. Outstanding Questions and Way Forward

Assessment against development plan policy and the OAPF

- 5.2 The discussion in the following paragraphs includes consideration of policy matters. A full assessment of the relevant development plan policies and OAPF guidance has been provided in Section 6 of this report.

Status of Croydon as an Opportunity Area and Metropolitan Centre

- 5.3 The consented scheme established that the redevelopment of the Whitgift Shopping Centre in that form would bring significant economic, social and environmental benefits and would create a step change for the vitality and viability of Croydon Metropolitan Centre, supporting the regeneration objectives of the Council. Since the approval of this scheme, the Council has also, supported by the developer, obtained a Compulsory Purchase Order for the site and a Stopping Up Order for Dingwall Avenue. These were both confirmed/supported by the Secretary of State/Planning Inspectorate following a public inquiry.
- 5.4 These latest plans for the development continue to be a major mixed-use, retail-led regeneration of a large area of the town centre. On the basis of the information seen to date, it is anticipated that the latest plans would be consistent with the Council's aspiration for comprehensive regeneration across a large part of the Retail Core and the benefits that such development would bring. Whilst the full net benefits come down to the specifics of the proposal, (which are discussed further in the sections below), the scale of the development proposed indicates that this proposal would also result in significant economic, social and environmental benefits.

Principle of Development

- 5.5 The approved scheme established that the retail, leisure, residential, community facilities and office uses that the scheme included were acceptable in this location and that the loss of existing buildings in that permission was acceptable.
- 5.6 As discussions for a revised scheme at this site are still at an early stage, floorspace, unit numbers and the mix of units have not been finalised. However, the developer has indicated that the amount of overall floorspace and the numbers of residential units would increase in comparison to the consented scheme. This is in part due to the fact the site area has increased to include the site of Green Park House on the corner of Wellesley Road and Poplar Walk. The current proposals are also indicating the demolition of buildings that were previously to be refurbished, in particular the Whitgift Car Park and the Marks and Spencer store. The proposal also includes additional height in some areas.
- 5.7 It has been indicated that there would be additional retail and leisure floorspace within the proposal. These uses are acceptable in this location as they are acceptable town centre uses.

- 5.8 The approved scheme resulted in the loss of 39,000 square metres of mainly outdated vacant office space from the retail core. Whilst the loss of Green Park House, in addition to this, is in principle acceptable (as this is also outdated, vacant office space), the Council will need to be satisfied that replacement development on the site is appropriate in the context of its proximity to a Grade I Listed Building (St Michaels and All Angels Church). This is discussed in more detail later in this report.
- 5.9 The proposal would provide much needed housing in the Croydon Opportunity Area (COA) which is fully endorsed by adopted policies.
- 5.10 The principle of residential use in the Retail Core is fully supported by policy at the National, Regional and Local level and the potential increase in the number of residential units up to 1,000 is in line with the OAPF.
- 5.11 As with the approved scheme, there is a desire for the residential element to be brought forward as soon as possible. It will be necessary to make provision regarding the delivery of the residential element (including affordable housing) within a section 106 agreement associated with any future planning application.
- 5.12 Discussions around the level of affordable housing are yet to take place and the developer has not yet appointed a Residential Provider (RP).

Townscape and Visual Impact

Layout

- 5.13 The latest proposals for the site show three full levels of retail floorspace at ground, first and second floor with a mezzanine level above. Servicing would be accommodated in the basement. Above the retail would be the leisure uses on the south western side of the site (towards North End), with additional localised cinema height to accommodate an IMAX screen, in comparison to the approved scheme, and all of the car parking would be proposed at roof level on the eastern side of the site (towards Wellesley Road). It has been indicated that there could be five floors of car parking above the retail uses. Plant would also be accommodated at roof level. The Council would encourage the developer to position as much plant as possible in the basement, but it is recognised that there are certain types of plant that need to be accommodated on the outside of the buildings.
- 5.14 Residential uses would be located within a 25 metre deep strip along Wellesley Road. In addition, there are opportunities for residential use along Poplar Walk and above a replacement for the Marks and Spencer store.
- 5.15 The general layout arrangement of uses follows a similar principle to that on the approved scheme. However, there are some differences. The main changes are that the residential strip fronting Wellesley Road extends further north to incorporate the site of Green Park House, there is no longer car parking at lower levels fronting Wellesley Road as the Whitgift car park would now be demolished and the Marks and Spencer building is also proposed to be demolished and replaced. These changes, which include the removal of the car

parking ramps, also allow the opportunity to improve the visual amenity of Poplar Walk and for an area of public realm to be created at the northern end of the site.

- 5.16 The final position of building elements is still the subject of ongoing discussions, any comments would be welcomed from Members regarding the suitability of the positions of buildings and the location of uses.

Bulk and Massing

- 5.17 Plans that have been discussed to date have shown a significant increase in bulk and massing in comparison to the approved scheme and the existing situation, and in some areas, significant increases in height.
- 5.18 The approved scheme established a principle of building up the massing towards the Wellesley Road frontage and to step the massing down towards the more sensitive areas of George Street, North End and Poplar Walk where heritage assets and the Conservation Area are located. This approach was supported in the approved scheme.
- 5.19 The currently proposed scheme results in a significant increase in massing in certain areas. There is concern over the extent of negative impact on heritage assets (whilst acknowledging further heritage impact assessment work is underway in this respect).
- 5.20 Five floors of car parking are proposed above the retail uses and the additional bulk and massing of these car parking floors compared to the consented scheme is highly visible from certain key viewpoints; there is concern about adverse impacts on the adjacent heritage assets. The car park decks would be located along a north-south alignment, behind the residential uses on Wellesley Road. They would extend north towards Poplar Walk and south, being above the proposed department store at the southern end of the site. Officers are of the view that on the plans seen to date the location of the car parking, along with a residential tower of substantial height on the corner of Poplar Walk and Wellesley Road would have a significant impact on the setting of St Michaels and All Angels Church, which is Grade I listed. Further discussions and refinement of this element of the scheme is required to determine what an acceptable impact would be when balanced against other planning considerations. This should be done alongside the development of the heritage assessment for the site.
- 5.21 It is recognised that the existing relationship of the Grade I Listed church with the existing Whitgift Car Park exit ramps onto Poplar Walk is not ideal, and their proposed removal presents an opportunity to enhance the setting of the church. Further discussion is required to ensure that any development proposed in this area has an appropriate relationship with this church. The latest proposal to have a roof terrace on the proposed adjacent building (which would provide an opportunity for a new view of the church) seems like a positive element of the scheme. Further work regarding the form of buildings in this area could create an improved relationship with the church.

- 5.22 A new building is proposed for the site of the existing Marks and Spencer building. It is currently indicated that this would be set back from the existing corner by 6 metres along North End, to allow an area of public realm to be created along Poplar Walk. The provision of public realm along Poplar Walk presents an opportunity to improve the pedestrian experience in this area, as well as open up new views of St Michaels and All Angels Church and is an improvement on the existing situation. The new building that is proposed on the site of the existing Marks and Spencer has been shown as a part 5, part 7, part 9 storey building fronting on to North End (with the highest part on the corner of North End and Poplar Walk) and is proposed as mostly 9 storeys along Poplar Walk (with a small setback where it meets North End). This building is much higher than the existing Marks and Spencer building (which is 3 storeys). A balance needs to be achieved between the height of this element, the benefit of setting this building back and the fact that the building is located within the Central Croydon Conservation Area. The existing Marks and Spencer building is identified as making a positive contribution to the Conservation Area, which will also be an important factor in achieving the correct balance of development in this location. Further discussion is required to ensure that it does respect the Conservation Area and there is an appropriate relation to adjoining buildings on North End.
- 5.23 The additional bulk present in most views but most notably from views from adjacent heritage assets is attributable to a number of scheme design factors including in particular all of the car parking for the scheme being proposed at roof level and the car parking not extending across the roof of the north-south route.
- 5.24 The approved scheme limited the car parking numbers to 3,140 for the majority of the time, with the numbers permitted to increase to 3,500 spaces at peak times for a maximum of 20 days per annum and this was controlled by planning condition. Whilst the level of car parking in the approved scheme was accepted in the consented scheme in the grant of permission and by the Secretary of State in his approval of the CPO, it did represent a level of car parking that was in excess of the London Plan Parking Standards for the amount and type of floorspace consented. It is understood that the latest proposals have been designed on the basis of providing 3,140 car parking spaces. Whilst it is welcomed that a lower 'upper threshold' is now being proposed, further discussion is required on this matter in relation to the impact of the bulk of the car parking. The car parking numbers also need to be looked at in relation to transportation impacts and this is discussed further in the 'Transportation, Access and Parking' section below.
- 5.25 Further discussions need to be had with the developer in relation to the overall number and location of car parking spaces in the context of the bulk and massing at roof level and concerns over the extent of impact on local heritage assets.
- 5.26 Residential uses would be concentrated along Wellesley Road and on the site of the existing Marks and Spencer building (as discussed above). The residential uses along Wellesley Road would be in the form of towers and infill blocks. The currently proposed minimum parameter plans show three towers

between 25 and 30 storeys in height, and a 12 storey infill block. Two options are currently being proposed for the maximum parameters. The first would have a 35 storey tower proposed as student accommodation or a hotel, with three other towers proposed in similar locations to the minimum parameter plans, but with the heights varying from 40-45 storeys. This option would also have 12 storey infill accommodation between the towers. The second option for the maximum parameter would lose the student accommodation tower and southernmost residential tower would increase its footplate. Heights would remain proposed at 40 to 45 storeys.

- 5.27 Careful consideration needs to be undertaken by the developer to ensure that these towers do not coalesce in viewpoints, especially when viewed from the Almshouses. The height of the tower on the site of Green Park House (currently proposed at 40 storeys), needs to be carefully assessed in the context of the Grade I Listed St Michaels Church to ensure that there would be no significant detrimental harm on this heritage asset. Further work and discussion with officers is required by the developer in this regard, and further information has been provided by the developer recently. Further work is also required in relation to how the heights of the towers relate to one another. This aspect could be controlled through the use of design guidelines (as occurred in the approved scheme) or, if possible, that this is dealt with before the maximum parameters are fixed.
- 5.28 The additional bulk across the site that is currently proposed by the developer would be visible from most of the viewpoints that have been presented to officers. There are concerns that the scale and form of development in its current iteration would not be appropriate and there is concern regarding the impact on adjacent heritage assets. There is also concern that the bulk, massing and form of development as currently shown may be more led by internal space requirements (for the internal layouts of retail and leisure uses and the car parking), as opposed to the form of development being designed in consideration of and in response to the wider urban context. Clearly an appropriate balance needs to be struck and further discussions will continue with the developer.

Architecture

- 5.29 As discussions are still at an early stage, specifics of architectural styles are yet to be discussed. In future design development, regard will need to be had of the proximity of heritage assets, the Conservation Area and that the existing Marks and Spencer building proposed to be demolished is currently a positive element in the Conservation Area.
- 5.30 As with the approved scheme, the intention is to produce a set of design guidelines for the planning application to guide architectural quality when reserved matters come forward. Discussions have not yet commenced on the design guidelines and officers are keen for these to commence soon.

Frontages

- 5.31 The changes to the scheme in comparison to the approved scheme mean that as well as entrances on to North End and George Street and a frontage along the full length of the site on to Wellesley Road, the scheme will also have a frontage along the full length of Poplar Walk. This is welcomed as it presents an opportunity to improve the environment and create improved links with West Croydon.
- 5.32 The design guidelines will need to be crafted to ensure that the frontages of the development relate to the surrounding character and address the street appropriately. This will be particularly important along Wellesley Road given the length of this frontage in the latest plans, and the need to accommodate within this length a complex mix of town centre pedestrian environment, residential entrances, retail frontages, public realm, and vehicular accesses. Particular attention will need to be given to the vehicular access points and ramps up to the car parking decks to ensure that they are appropriately designed in the context of both a completed scheme where the residential element is completed and also in a situation if/where the residential element comes forward as a later phase. Appropriate meanwhile uses for the area of the site to be occupied by the residential uses will be required at an appropriate time should the residential element not come forward at the same time as the main commercial elements.
- 5.33 Further discussions between the developer and officers are required in relation to this matter.

Townscape

- 5.34 Verified views will be required of the scheme to allow a comprehensive visual impact assessment to take place. This will need to form part of the Environmental Impact Assessment which will be required as part of any future application. Initial discussions have commenced regarding the list of views that will need to be tested.

Heritage Assets

- 5.35 This application has the potential to impact a number of heritage assets including the Grade I Listed Hospital of the Holy Trinity (Almshouses), Grade I Listed St Michaels and All Angels Church, the Grade II Listed Electric House and the Central Croydon Conservation Area. There are also a number of Locally Listed buildings along North End and George Street.
- 5.36 The existing Marks and Spencer building that is proposed for demolition is located within the Central Croydon Conservation Area. The Central Croydon Conservation Area Appraisal and Management Plan (CAAMP) 2014 identifies that the building is located in the North End character area and that it makes a positive contribution to the Conservation Area.
- 5.37 This building is considered to be of heritage value and along with other buildings that make a positive contribution to the conservation area, collectively contribute towards the Conservation Area's special interest. The developer will need to justify why this building needs to be demolished in the interests of the

comprehensive redevelopment of the Whitgift Centre (which was discussed at the CPO inquiry) as the planning policy position is that demolition of buildings that make a positive contribution to the special character of the Conservation Area should be resisted. Its replacement must be of sufficient quality alongside the strength of other material planning considerations to outweigh the statutory presumption against granting planning permission referred to below as the Council must pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

- 5.38 The existing Whitgift Car Park is not a heritage asset and it is not located in the Conservation Area. The intention of the developer is for the car parking spaces contained within it to be re-provided in an alternative location within the scheme. The loss of this car park structure is welcomed as it allows the opportunity for a more comprehensive redevelopment of this section of the site and a more positive relationship with Wellesley Road.
- 5.39 Although illustrative heights and maximum parameters have not been finalised, from the information presented to officers to date, the proposals show significant increases in bulk and massing in close proximity to the Almshouses (which would also be visible from the courtyard of the Almshouses), in close proximity to St Michaels and All Angels Church, adjacent to Electric House and within the Conservation Area (specifically on the site of the existing Marks and Spencer building). In relation to the Almshouses, further information has been provided by the developer recently.
- 5.40 A detailed heritage assessment is required to fully assess the impact of the proposals on adjacent heritage assets. It will be important that the impact of the bulk and massing on adjacent heritage assets is acceptable. Discussions are ongoing and these matters will need to be further refined to ensure that impacts on adjacent heritage assets are acceptable.
- 5.41 Officers would strongly encourage early engagement between the developer and Historic England to ensure that matters are addressed prior to the submission of a planning application.
- 5.42 As with the approved scheme, the Environmental Impact Assessment associated with any future planning application will need to make a full assessment of the archaeological implications of the proposed development and identify mitigation measures where required.

Transportation, Access and Parking

- 5.43 How the site is proposed to be accessed by vehicles has evolved since the approved scheme. The car parking arrangements have also evolved. Under the approved scheme there were separate north and south car parks. Cars accessing the development from the north and using the northern car park would have been required to exit towards the north. The equivalent applied to cars entering and exiting the southern car park from the south. The current proposals include one continuous car park at roof level. There will still be a northern and a southern access point, but they differ in form from the approved scheme accesses.

- 5.44 The southern access point will be in broadly the same location as previously approved, but will need to be wider. The consented scheme allowed service vehicles to enter the site at the southern access point and exit at the northern one and the latest plans are that service vehicles will enter and exit the site at the southern access point. This results in a wider junction arrangement on Wellesley Road.
- 5.45 The form of the northern access point has been revised. The approved scheme required vehicles to enter the site via Poplar Walk and exit onto Wellesley Road close to the junction with Sydenham Road. The latest plans are for vehicles to enter and exit the site from Wellesley Road at a point opposite the junction with Sydenham Road. This would require the provision of a right hand turn from the southbound carriageway on Wellesley Road and a new signalised junction at this point. The latest plans show a revised highway layout for Wellesley Road to accommodate this junction, with two lanes of general traffic and a bus lane northbound and on the southbound side of the carriageway, there would be 2 lanes of general traffic and south of the Sydenham Road junction, also a bus lane. The central medial would achieve a width of 7 metres along much of its length, in line with the Council's planned public realm improvement works on Wellesley Road.
- 5.46 The changes to the northern access mean that the eastern end of Poplar Walk can remain as one-way for vehicular traffic. This means that there is opportunity for public realm improvements and the planned contraflow cycle lane (forming part of Quietway 5, between Waterloo and Croydon), can remain and be more readily achieved along the full length of Poplar Walk. This, along with the proposed area of public realm and the potential for improving the setting and views of the Grade I Listed church, is seen as a positive aspect of the proposed changes to the scheme.
- 5.47 The latest plans result in changes to the proposed / indicative layout of Wellesley Road. They also result in service vehicles exiting as well as entering the development from the Wellesley Road. Under the approved scheme, service vehicles would exit into Poplar Walk. Whilst removal of service vehicles from Poplar Walk is positive, it does require a further enlarged combined entrance and exit into the car park and the service area across the western footway on the Wellesley Road at the southern end of the development (as outlined above). This will need to be carefully designed to ensure that there is no significant detrimental impact on the safety of pedestrians using the western footway on Wellesley Road. Further discussion is required with the developer on this matter.
- 5.48 Croydon Council, as part of its planned public realm improvement works, is implementing a public realm scheme for Wellesley Road. This involves the provision of an 'at grade' crossing at the Bedford Park junction, a widened and landscaped central reservation for Wellesley Road and a contraflow cycle lane going east to west along the eastern part of Poplar Walk and along Bedford Park. The latest proposals by the developer acknowledge and work with this public realm scheme and incorporate it into the proposed layout for Wellesley Road. Wellesley Road is proposed to have 2 general traffic lanes in each direction plus a bus lane in each direction (only to the south of the Sydenham

Road junction on the southbound carriageway). This proposed layout means that the pavement on the western side of Wellesley Road would be able to achieve a minimum 5 metre width to the site boundary, which is in line with the pavement width being achieved by the Council's planned public realm improvement works. The implications of this are discussed in the section below. However, it is noted that pedestrian modelling will need to be prepared to assess the acceptability of the proposed pavement widths, and to consider the impact on visitors to the shopping centre and on bus passengers using the stops on Wellesley Road.

- 5.49 The developer has been undertaking traffic modelling work with Transport for London (TfL). This will update the work undertaken as part of the approved scheme, in order to reflect any changes to the base and future networks, and ensure a fully robust transport assessment is produced to support the new application. The VISSIM modelling will be used to determine the acceptability of the revised layout on tram, traffic and bus capacity and movements on Wellesley Road and the surrounding network. Discussions are ongoing with both TfL and the Council's Transportation Officers in relation to validating the traffic modelling and ensuring that the correct scope of information is being used to assess the impacts of the proposals on traffic flows and the operation of public transport in the vicinity of the site.
- 5.50 The developer will need to provide information on the service arrangements for the residential component and how the service vehicles would access and exit the site. Similarly information on the number, location and access to blue badge parking for the residential component is yet to be discussed. It is understood that options for these elements are being worked through by the developer.
- 5.51 All proposed car and cycle parking would need to be fully assessed against the requirements of the London Plan, and any deviations from policy would require strong justifications. A parking strategy detailing management of internal car parking, blue badge, electric vehicles and servicing would be required. All traffic and parking proposals would need to be assessed in relation to achievement of air quality neutral or better objectives.
- 5.52 Coach, taxi, cycle strategy and cycle hub, dial-a-ride etc management were reserved matters under the approved scheme. A delivery and servicing strategy was also secured on the approved scheme.
- 5.53 Construction impacts will need to be identified in the transport assessment and will need to have regard to TfL and Council guidelines and will need to reflect the Council's 5 year delivery plan, including a planned strategy for major regeneration in the town centre. Further discussions with TfL and the Council will be required.
- 5.54 All mitigation measures will be determined following completion of the modelling and transport assessment work. As a minimum the improvements secured via s106 as part of the approved application will be required. Additional appropriate mitigation to reflect the increases in floorspaces and to reflect

resultant growth in demand on the network will be discussed with the Council, TfL and the applicant.

Public Realm and Landscaping

- 5.55 The revised highway layout for Wellesley Road, as discussed in the section above, is likely to have a neutral impact on the Council's planned public realm improvement works that are due to be undertaken imminently. Any future planning application will need to ensure that these works once implemented are retained. The highway layout currently proposed is such that the pavement on the western side of Wellesley Road is proposed as being 5 metres up to the site boundary. Discussions are ongoing with the developer in relation to how the proposed building form will meet the site boundary along Wellesley Road and the back edge of the pavement on the western side of Wellesley Road. The developer is exploring ways to provide an enhanced pedestrian environment as part of the proposals.
- 5.56 The developer has instructed landscape architects to look at the environment of Wellesley Road and a thorough analysis is required. More information is required in relation to understanding pavement widths, the pedestrian environment and how pedestrians are able to cross vehicle access points. Wellesley Road needs to be considered in its entirety to understand relationships between pavement widths, the location of bus stops and how these interact with the entrances to the retail centre and individual residential tower entrances. Options for how the building line can step in and out at lower levels to accommodate entrances, street furniture and landscape proposals and to ensure there is sufficient space on pavements to accommodate uses and users, while maintaining a legible and consistent building line above to define and enclose Wellesley Road needs to be fully examined and justified. Design development by the developer has started looking at how the building line can be set back and landscaping areas created. The locations of bus stops in relation to these areas are also starting to be explored. Discussions are ongoing on this matter and further design development will need to take place to develop initial concepts.
- 5.57 As with the approved scheme, there is an expectation that this scheme will provide public realm improvements to all roads adjoining the site and this can be secured through a section 106 agreement.
- 5.58 The approved scheme established a principle of breaking up the existing large block structure, by introducing a north-south pedestrian route through the scheme that linked George Street with Poplar Walk, having a main east-west 24 hour, covered 'street like' pedestrian route aligned with Lansdowne Road and a two secondary east-west routes to the north and south within the retail area. The design guidelines associated with the approved scheme set out widths, treatments and rules for each of these pedestrian routes.
- 5.59 Discussions have not progressed to a stage where this 'design guideline' level of detail has been finalised for the current proposals. However, the pedestrian north-south route remains and the three pedestrian east-west routes remain in a similar location as that consented. Few details have been provided (with the

exception of their locations), but more detail has been provided in relation to the 24 hour pedestrian east-west route.

- 5.60 The 24 hour pedestrian east-west route in the approved scheme is predicated on a key design principle of a high quality strategic route from East Croydon station to Old Town. A galleria 'street like' character was previously proposed, the character being derived from its legibility, scale, height and openness, albeit in a covered context. There is a concern that doors at either end of the route reduce the extent to which the route could knit seamlessly into surrounding streets and provide an acceptable strategic route in design terms, and most appropriately breaking down the previously impermeable block of the Whitgift Centre. The importance of this route is derived from both its provision of a physical route for pedestrians, but also because it opens up views from one side of the urban block to the other with no walls or doors at either end to impede physical or visual connections. The design guidelines for the approved application reflected the importance of this principle by specifying that this route would be a minimum of 12m wide at ground floor (16m above), open at both ends, covered with a glazed canopy (allowing a maximum of 30% to be non-glazing) and publicly accessible 24 hours a day. This was to ensure an environment and character that read as close as possible as an external space protected only by a glass roof and open at both ends.
- 5.61 However, the information submitted to date for the currently proposed 24 hour pedestrian east-west route incorporates doors at either end of the route and solid spans across the majority of the roof so to accommodate roof level car parking on the eastern side and leisure uses on the western side. This results in development across the roof of the route for the majority of its length. This would mean that the concept of an open galleria street like route would be significantly compromised, without changes to the plans. The doors would provide a physical barrier along this route, impacting on the connectivity of the surrounding townscape, and the predominantly solid roof covering created by the insertion of new food courts at first floor level and above on part of the western side of the 24 hour pedestrian east-west route, which risks creating an enclosed internal mall like character which is contrary to the design guidelines for the approved application. Plans that have been discussed to date show that the height of the roof of this route is only 6 metres high at its lowest point (which is to the west of the north-south route alignment) and also appears narrower than the route in the approved scheme. The resulting scale, nature and roof height of the route as seen at this stage is therefore considered inadequate and unsatisfactory. On a positive note, changes have been made to the internal ground floor level of the route, with it now proposed as being gently sloping up from North End to the Wellesley Road level. This is a great improvement on the approved scheme and the earlier iterations of these proposals, when the level change between North End and Wellesley Road was dealt with by way of escalators and stairs. The gradual change in levels is a more sophisticated design response, facilitating ease of access and is an improvement. However this gradual ramping of floor levels has exacerbated the overall lack of height from floor to ceiling, specifically a pinch point to the western side of the alignment of the north-south route.

- 5.62 Further discussions on this element of the scheme are required as officers remain to be convinced that the currently proposed characteristics of the 24 hour pedestrian east-west route are an acceptable solution. Officers are of the view that the development principles established in the approved scheme for this route should not be compromised and that the route should be open and galleria street like as is the case in the consented application design guidelines, as well as providing a strong visual connection between North End and Wellesley Road.
- 5.63 It is important to avoid creating a preference of the north-south route over the 24 hour pedestrian east-west route in retail attractiveness as far as possible and to avoid an unacceptable detrimental effect on North End.

Local Impact

- 5.64 The tallest elements of the proposed development would be located on the eastern side of the site, closest to Wellesley Road. This principle was also adopted in the approved scheme. A full assessment of the impact on local occupiers will need to be undertaken in any future planning application. Development is now extending further north along Wellesley Road, with the inclusion of Green Park House into the development site. The situation adjacent to this edge of the site has also changed, with the Saffron Square development now completed and Delta Point being converted to residential.
- 5.65 The proposed development will need to ensure that the proposed development limits any detrimental impact on these residential occupiers and appropriate assessments must be included in any future planning application.

Impact on Future Occupiers

- 5.66 Discussions have not yet reached the point where specifics of residential layouts have been discussed. It is noted that the increase in residential accommodation proposed is presented within a scheme which is not yet showing any external communal residential amenity space. The approved scheme utilised the roof of the car park for amenity space; however, no such proposals form part of the latest plans. The developer has stated that it is their intention that the uppermost floor of car parking would be open to the elements, rather than covered by a deck which was a key component of the approved scheme. This removes the possibility of utilising this space for residential amenity or any other use. The developer has indicated that residential amenity space would be provided vertically within the proposed residential towers. However, details of this are awaited. Officers are concerned that the proposed roofscape is a lost opportunity to provide external residential or public amenity space, the incorporation of sustainable design concepts/ green roofs and the encouragement of biodiversity. There are concerns that the visual amenity of the adjacent apartments would be poor.
- 5.67 Given the scale of the roof as a 'fifth elevation', the lack of covering or screening has adverse impacts on the visual amenity of not only future occupants of the residential towers of the scheme but also of other taller adjacent developments. Further work and discussion with officers is required by

the applicant in this regard to assess whether these adverse effects can be mitigated through alternative design solutions.

- 5.68 All residential units will be required to comply with National/London Plan standards as a minimum and will need to be of a sufficient quality. As such, particular attention needs to be given to the location and quality of amenity spaces to ensure that appropriate floorspace and amenity are provided and that innovative design solutions are employed to avoid a proliferation of single aspect units.

Sustainability and Energy

- 5.69 The sustainability aspects of the development have not been discussed in detail at this stage. Adopted policy requires a reduction in carbon dioxide emissions by at least 35% based on 2013 Building Regulations and also requires non-residential parts of the scheme to be constructed to BREEAM "Excellent" standards. This is in line with the levels agreed for the approved scheme and full details will be required on submission of any future planning application. Required elements will be secured by condition
- 5.70 To future proof the development provision, as with the approved scheme, the development would need to ensure that provision is made for connections and space within the buildings to allow connection to any future Croydon District Heating Network, should such a network come forward. This provision would be secured through an appropriate clause in the S.106 Agreement and by conditions to secure all relevant pipe work from the buildings to the edge of the site (to allow easy connection).

Sustainable Drainage

- 5.71 As with the approved scheme, a flood risk assessment will be required as part of any future planning application.
- 5.72 No details have yet been provided regarding sustainable drainage solutions. The developer is encouraged to engage with the Lead Local Flood Authority and details will be required on submission of any future planning application.

Environment

Contaminated Land

- 5.73 The development will require an Environmental Impact Assessment and this will be required to assess the contaminated land impacts of the development. This will need to demonstrate that the necessary investigations have been undertaken and propose necessary remediation which will be controlled by condition.

Air quality

- 5.74 The Environmental Impact Assessment to be submitted with any future planning application will be need to assess the air quality implications of both

the construction phases of the development and also when the development is operational.

Noise and Vibration

- 5.75 No details have yet been provided. However, the Environmental Impact Assessment to be submitted with any future planning application will need to assess the baseline noise and vibration environment and assess predicted likely significant impacts from the proposed development.

Biodiversity

- 5.76 Whilst the Phase 1 habitat survey submitted with the previous planning application concluded that the development did not have the potential to generate significant ecological effects, there are differences between the current proposal and the consented scheme and therefore a Phase 1 habitat survey will be required to assess the new proposals and also to make sure that the nothing has changed on the site that may have an impact on biodiversity.
- 5.77 The roof of the proposal has the potential to incorporate green roofs and improve biodiversity. This needs to be further explored by the developer, particularly when considered against the content of paragraph 5.62 above.

Wind and Microclimate

- 5.78 No details have yet been provided. However, the Environmental Impact Assessment to be submitted with any future planning application will need to assess the microclimatic conditions associated with the proposed development to ensure that there will be a satisfactory environment for pedestrians and future residents. Any mitigation measures would be secured by condition as appropriate.

Electronic Interference

- 5.79 As with the approved scheme, as this scheme will involve the construction of tall buildings, provision will be required to be made in the a S106 agreement associated with any future planning application, for mitigation, should interference or deterioration occur to television signals in the locality

Other Planning Matters

Access and Inclusive Design

- 5.80 As with the approved scheme, the development will be required to adhere to these policy requirements to ensure that the development is accessible to all and an access statement will also be required as part of any future planning application.

Safety and Security

- 5.81 The development should be designed to ensure that it minimises and discourages crime. The developer should engage with the Metropolitan Police

Service, in particular their Crime Prevention Design Advisors and Counter Terrorism Officers to ensure that it achieves this aim.

Phasing

- 5.82 As with the consented scheme, the proposed development is likely to result in the Whitgift Shopping Centre being closed once construction commences. It is likely that existing occupiers will either decant to other areas of the town centre where there are current vacancies or will close. This is evidenced by the recent submission of a Lawful Development Certificate for the food hall within Centrale, for use for retail purposes. This application has been consented. The relocation and decant strategies have been discussed as part of the CPO process.
- 5.83 The approved scheme allowed for a 'two phase' approach for construction of retail/leisure and residential, although the two phases were linked, including by the construction of the podium structure upon which the residential towers were to be constructed. The latest plans are for the residential elements along Wellesley Road to be constructed independently from the retail/leisure elements of the scheme. Whilst this has positive features in terms of ease of construction, sufficient meanwhile uses for the residential land and strong design of the eastern elevation of the retail/leisure element will need to be provided and secured by planning condition to ensure an acceptable appearance until the residential phase comes forward. The separation of the residential and retail uses also puts pressure on the development space which contributes to the identified lack of external amenity space as referred to at para 5.62. Further discussion with the developer is needed in this respect and it will be important to deal with the timing of the residential phase in relation to the retail/leisure phase.

CIL and S106 Agreement

- 5.84 On 1 April 2013 Croydon Council adopted its CIL charging schedule for the purpose of the Community Infrastructure Levy Regulations 2010. The charging schedule sets out the rates at which the levy is to be charged to fund infrastructure set out in Croydon's Regulation 123 List ("relevant infrastructure"). Items of relevant infrastructure will be funded via a CIL payment.
- 5.85 As with the consented scheme, matters that are not covered by the Regulation 123 list and that are required to be mitigated as a result of the development, will require a section 106 agreement.
- 5.86 Discussions have not yet commenced for the specifics of section 106 requirements, but it is anticipated that these discussions will commence shortly. The starting point for these discussions will be the mitigation measures that were secured for the consented scheme. Any additional impacts as a result of the changes will also need to be mitigated.
- 5.87 There is a strong officer expectation that negotiations would need to take place around the delivery and level of affordable housing (in the context of revised

viability considerations) and employment and training clauses alongside an appropriate level of financial contributions to reflect the Council's approach to job brokerage – making sure that training and recruitment is directed proactively towards local people seeking work and related training opportunities. Early discussion in this respect is strongly encouraged.

6 POLICIES

- 6.1 The key policies that the proposal needs to be considered against are as follows:

Status of Croydon as an Opportunity Area and Metropolitan Centre

- 6.2 The National Planning Policy Framework 2012 (NPPF) supports the vitality of town centres through 'the town centres first approach' and requires that retail, leisure and other town centre needs be met in full.
- 6.3 Paragraph 24 states: 'Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered'.
- 6.4 London Plan Policy 2.13 identifies Croydon as an Opportunity Area and states that the Mayor will encourage and support the preparation of area frameworks to realise the growth potential as outlined in the London Plan. London Plan Policy 2.15 defines Croydon as a Metropolitan Centre (and therefore performs a regional function) for the purposes of retail planning alongside the Croydon Opportunity Area (COA) designation. Croydon is recognised in the London Plan as the largest Metropolitan Centre in London.
- 6.5 The Croydon Local Plan: Strategic Policies SP3.1 encourages innovation and investment into the borough to support enterprise and increased employment for the benefit of all Croydon residents and through SP3.9 identifies the Croydon Metropolitan Centre (CMC) as the principal location in the borough for office, retail, cultural (including a diverse evening/night-time economy) activity. SP3.12 states the Council will favourably consider net increases to the stock of retail premises commensurate with Croydon's retail function as a Metropolitan Centre and ensuring the viability and vitality of CMC. Furthermore, SP2.2(b) is clear that it is anticipated the Croydon Opportunity Area will accommodate a net increase of at least 7,300 dwellings over the plan period. Policy SP1.2 of The Croydon Local Plan: Strategic Policies states that development proposals should be informed by the "Places of Croydon". The Croydon Local Plan: Strategic Policies (paragraph 7.30) states that for the COA (one of the 16 "Places of Croydon") the OAPF sets out detailed guidance on how the vision for the COA is to be achieved.
- 6.6 The Croydon Opportunity Area Planning Framework (OAPF), adopted January 2013 as Supplementary Planning Guidance to the London Plan and adopted April 2013 as a Supplementary Planning Document to the Croydon Local Plan:

Strategic Policies, provides a framework for the delivery of this development. It seeks to put in place a flexible plan that will support the growth of the COA. One of the key objectives of the OAPF is to promote reinvigoration of the retail core through development and renewal. Paragraph 5.17 of the OAPF sets principles for improvement of the Wellesley Road to guide future development and investment.

- 6.7 The OAPF acknowledges that over the last 30 years the COA's prominence has declined, largely as a result of a decrease in demand for 'back-of-house' office space in the area and the emergence of Canary Wharf as an alternative office location. This has led to an increase in vacant office space and a related fall in the numbers of people working, and travelling into the COA. During this time there has also been limited investment in the COA. There has been little or no change to the physical make-up of the area. Evidence of this can be seen in the limited improvement in the quality of public realm. This lack of improvement continues to damage people's perception of the area. The COA has been slow to present itself in an alternative, positive light, which it must do if it is to attract the development and investment that is necessary to bring the desired change. Regeneration of the COA has never been more important. A mixture of increased economic, retail, residential, cultural and social activities all set within a pleasant urban environment is the aim. Action and carefully guided development is needed to generate the energy and dynamism required to stem this decline.

Principle of Development

- 6.8 London Plan Policy 2.16 identifies Croydon as a strategic office location. The Croydon Local Plan: Strategic Policies SP3.10 adopts a flexible approach to B1 uses (office, light industry and research & development) within Croydon Metropolitan Centre. This flexible approach is supplemented by the Croydon Opportunity Area Framework, which promotes the removal of redundant office space in the town centre and seeks to focus 95,000sqm of new office space in the New Town and East Croydon character area. The primary objectives of this approach is to consolidate office provision within the COA to improve overall quality, especially in the New Town and East Croydon character area, and provide greater opportunities elsewhere in the COA for residential development through either conversion or redevelopment.
- 6.9 Chapter 6 of the NPPF relates to delivering a wide choice of high quality homes. It states that: 'housing applications should be considered in the context of the presumption in favour of sustainable development' and that it is the role of local planning authorities 'to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities'.
- 6.10 London Plan Policy 3.3 relates to increasing housing supply and states that the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. London Plan Policy 3.4 seeks to optimise housing potential, taking into account local context and character, the

design principles and public transport capacity, development should optimise housing output for different types of location within the relevant density range.

- 6.11 The Croydon Local Plan: Strategic Policies SP2.1 applies a presumption in favour of development of new homes, subject to policy requirements. In order to provide a choice of housing for people in Croydon through SP2.2 the Council will seek to deliver a minimum of 13,300 homes between 2011 and 2021 in line with London Plan target for new homes, achieved by a) concentrating development in the places with the most capacity to accommodate new homes whilst respecting the local distinctiveness of the Places of Croydon and protecting the borough's physical, natural and historic environment; and b) Within the Croydon Opportunity Area the Croydon Local Plan: Detailed Policies and Proposals DPD will be informed by an Opportunity Area Planning Framework and will allocate sites for at least 7,300 net additional homes. The proposal would provide much needed housing in the COA which is fully endorsed by the above policies.
- 6.12 An objective of the OAPF is to support the delivery of 7,300 new homes within the COA over the next 20 years and supplement the evidence demonstrating the deliverability of 7,300 new homes within the COA as outlined in the Croydon Local Plan: Strategic Policies. This equates to 17,000 new residents in addition to the 8,000 already living there (paragraph 4.40). The site lies within the area defined as the Retail Core and paragraph 4.27 of the OAPF sets a series of outcomes that new development in this location should seek to deliver in terms of residential; providing for approximately 1,100 homes to be delivered across the Retail Core as a whole over the 20 year life of plan and the associated amenity and social requirements of a residential population.
- 6.13 Paragraph 50 of the NPPF requires local authorities to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 6.14 London Plan Policies 3.8 to 3.13 relate to affordable housing.
- 6.15 Policy 3.11 of the Further Alterations to the London Plan states that the Mayor will and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing. London Plan Policy 3.12 states 'The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes (having regard to current and future affordable housing requirements, affordable housing targets, the need to encourage rather than restrain, the need to promote mixed and balanced communities, the size and type of affordable housing needed and the specific circumstances of individual sites).

- 6.16 London Plan policies 3.12 and 3.13 indicate that the maximum reasonable amount of affordable housing should be sought on schemes, taking into account viability and other issues.
- 6.17 The Croydon Local Plan: Strategic Policies seeks up to 50% affordable housing provision on sites such as this (SP2.4). Table 4.1 provides flexibility, requiring a minimum level of affordable housing on all sites. On adoption of the plan, this was set at 15%. In the Croydon Opportunity Area, with a minimum of 10% affordable housing needing to be provided onsite with the remainder being provided on-site, off-site or through a commuted sum.
- 6.18 Policy SP2.4 requires the minimum level of affordable housing to be reviewed in the OAPF area on a three yearly basis. From 1st May 2016 the minimum affordable housing requirement will be uplifted to 50%. 10% will need to be provided on site and the remaining 40% will need to be provided either through a review mechanism or via a commuted sum.
- 6.19 Paragraph 4.42 of the OAPF seeks to secure as a minimum 15% affordable housing. It requires applicants to have a combined engagement with Registered Providers and planning authorities, demonstrate that off-site donor sites will contribute to a mixed and balanced community as well as delivering their own affordable housing requirements; and ensure that affordability is adequately considered where sub-market rental schemes are proposed and to demonstrate that rental levels are not out of reach for prospective tenants in the area. Whilst this may be sustainable for smaller homes, rents on larger homes will need to be carefully assessed because of anticipated benefit caps.

Townscape and Visual Impact

- 6.20 Through the NPPF, significant importance is attached to the design of the built environment. Paragraph 61 highlights the importance of the visual appearance and the architecture of individual buildings, but also addresses the importance of connections between people and places and the integration of new development into the natural, built and historic environment. Paragraph 63 places significant weight on outstanding or innovative designs which help raise the standard of design more generally in the area.
- 6.21 London Plan Policies 7.1 to 7.7 set out a series of design principles for development in London. These seek to maximise the potential of sites and improve the quality of development. London Plan Policy 7.2 requires all new development in London to achieve the highest standards of accessible and inclusive design. London Plan Policy 7.3 seeks to create safe, secure and appropriately accessible environments that reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. London Plan Policy 7.4 requires buildings, streets and open spaces to provide a high quality design response that: a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass; b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area; c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel

comfortable with their surroundings; d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area; and e) is informed by the surrounding historic environment. London Plan Policy 7.6 demands the highest architectural quality, to enhance the public realm, use appropriate materials, not harm surrounding amenity, provide high quality indoor and outdoor spaces, be adaptable, inclusive and optimise potential. London Plan Policy 7.7 states that tall and large buildings should: a) be located in town centres that have good access to public transport; b) only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building; c) relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm; d) improve the legibility of an area; e) incorporate the highest standards of architecture and materials, including sustainable design and construction practices; f) have ground floor activities that provide a positive relationship to the surrounding streets; g) contribute to improving permeability; h) incorporate publicly accessible areas on the upper floors where appropriate; and i) make a significant contribution to local regeneration.

6.22 Croydon Local Plan: Strategic Policies require development of high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities (SP4.1). SP4.2 requires development to be informed by the distinctive qualities, identity, topography, protect Local Designated Views, the setting of Landmarks, other important vistas and skylines and enhance social cohesion and well-being. SP4.4 and SP4.5 relate to the Croydon Opportunity Area, supporting high quality, high density developments that are tailored to and help to protect or establish local identity (SP4.4) and encouraging proposals for tall buildings only in the Croydon Opportunity Area (SP4.5). SP4.6 requires tall buildings to respect and enhance local character and heritage assets, minimise the environmental impacts and respond sensitively to topography, make a positive contribution to the skyline and image of Croydon and include high quality public realm.

6.23 The OAPF in paragraph 4.27 sets a series of outcomes that new development in the Retail Core should seek to deliver; in terms of design:

- Secure high quality architecture and design for the built environment across the COA
- Locate tall buildings closest to Wellesley Road away from the most sensitive locations in terms of privacy, heritage security and overshadowing

6.24 UDP Saved Policies 2013 UD1-15 relate to urban design, requiring a high standard of design for all development and require it to respect the existing development pattern. Policy UD1 requires development to be high quality, inclusive and sustainable in design, Policy UD2 requires development to respect the existing development pattern and address street frontages. Policy UD3 refers to the scale and design of new buildings, in relation to height and proportions, character, density, architectural features and the use of materials. Policy UD4 requires shopfronts to respect the building of which they form part,

whilst UD5 requires advertisements to safeguard amenity and public safety. Policy UD6 demands issues of safety and security to be an intrinsic consideration, policy UD7 expects proposals to be designed with ease of access for all users as a prime consideration and policy UD8 seeks to protect residential amenity. Policy UD11 relates to views and landmarks, particularly for high buildings. Policies UD12 and 13 demand that new street and parking must not be allowed to dominate or determine urban form. The Council will have regard to (i) creating a new, appropriate and desirable landmark feature amongst views in the town centre; and (ii) adversely impacting upon, for instance by obscuring or detracting from, designated panoramas, local views and landmarks.

Heritage Assets

- 6.25 The Planning (Listed Buildings and Conservation Areas) Act 1990 is relevant to this proposal. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a general duty as respects listed buildings in exercise of planning functions. It requires the local planning authority to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant planning permission. It goes on to say that a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings when discharging certain other planning functions.
- 6.26 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a general duty as respects conservation areas in exercise of planning functions; with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 6.27 These statutory provisions have been found in case law to amount to a strong presumption against granting permission for any development which would fail to preserve the setting of a listed building or the character or appearance of a conservation area, even if the harm is limited or less than substantial. That statutory presumption may, however, be outweighed by material planning considerations provided they are strong enough to do so.
- 6.28 In Chapter 12 of the NPPF, it states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.
- 6.29 Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this

assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

- 6.30 The existing Marks and Spencer building that is proposed for demolition is located within the Central Croydon Conservation Area. The Central Croydon Conservation Area Appraisal and Management Plan (CAAMP) 2014 identifies that the building is located in the North End character area and that it makes a positive contribution to the Conservation Area.
- 6.31 Paragraph 134 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. However, case law indicates that what is required is not the simple planning balance exercise in which the planning authority may attach such weight to the harm as it sees fit. The planning authority must give "considerable importance and weight" to any harm to the setting of a listed building or to a conservation area, even if it is "less than substantial".
- 6.32 London Plan policy 7.4 demands development to provide a high quality design response that is informed by the surrounding historic environment. London Plan Policy 7.7 requires the impact of tall buildings proposed in sensitive locations to be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, which is relevant to this proposal. 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 architectural detail. The Croydon Local Plan: Strategic Policies seek to promote the use of heritage assets and local character as a catalyst for regeneration (SP4.12), require development to respect and optimise opportunities to enhance Croydon's heritage assets, their setting and the historic landscape, including through high quality new development and public realm that respects the local character and is well integrated (SP4.13) and will strengthen the protection of and promote improvements to Statutory Listed Buildings, Conservation Areas and Local List of Buildings (SP4.14).
- 6.33 The OAPF in paragraph 4.27 sets a series of outcomes that new development in the Retail Core should seek to deliver, which includes locating tall buildings closest to Wellesley Road away from the most sensitive locations in terms of privacy, heritage security and overshadowing. As a principle, the OAPF requires the development of, and building in the setting of, heritage assets to respect and/or enhance or better reveal these assets. New development should seek to stitch these heritage assets into the fabric of the COA, ensuring they can be integral parts of the town. Future protection and/or enhancement of these assets is important.

- 6.34 UDP Saved Policy 2013 UC2 (Control of Demolition in Conservation Areas) states that the Council will not grant Conservation Area Consent for the demolition or partial demolition of buildings unless the building/s: (i) makes no positive contribution to the character and appearance of the conservation area; and (ii) are beyond economical repair; and (iii) re-use has been adequately investigated. Where it is demonstrated that the building/s make no contribution to the character of the area and there are full, acceptable and detailed plans for the site of the building to be demolished or partially demolished, consent will be granted subject to conditions linking demolition to the implementation of an approved redevelopment scheme. Policy UC3 (Development Proposals in Conservation Areas) states that development will only be permitted if all the following criteria are met: (i) It can be demonstrated that the proposal pays special attention to scale, height and massing, historic building lines, traditional patterns of frontages, vertical or horizontal emphasis, plot widths, detailed design and traditional use of materials and detailing, (ii) If outside a Conservation Area, the proposal does not affect its setting or views in and out of the conservation area, (iii) Existing traditional features including boundary walls, ground surfaces, shopfronts and street furniture are retained and where necessary restored, (vi) The character of the area would not be adversely affected because of the traffic generation, vehicle parking and servicing, or noise. UC9 considers schemes affecting buildings on the Local List which is relevant to this proposal.
- 6.35 Also of relevance is Historic England's Tall Buildings Advice Note (No. 4). This provides advice in relation to the impact of tall buildings on the historic environment and highlights that it is good practice to engage with Historic England prior to submitting a planning application. It also states that when considering proposal that has an adverse impact on a heritage asset 'great weight should be given to the asset's conservation with any harm requiring a clear and convincing justification'. Weight should also be attached to the public benefits offered by a tall building proposal and local planning authorities will need to pay particular regard to delivering positive improvements in the quality of the built, natural and historic environment
- 6.36 This application has the potential to impact a number of heritage assets including the Grade I Listed Hospital of the Holy Trinity (Almshouses), Grade I Listed St Michaels and All Angels Church, the Grade II Listed Electric House and the Central Croydon Conservation Area. There are also a number of Locally Listed buildings along North End and George Street.
- 6.37 A section of the site is located within an Archaeological Priority Zone. Therefore, policy 7.8 of the London Plan, SP4.14 of the Croydon Local Plan: Strategic Policies and UDP Saved Policy UC11 are relevant. These policies seek to ensure that the archaeological heritage of the site is properly recorded and if any archaeological remains are found, they are retained in situ where possible. Development should also incorporate measures that identify, record, protect and where appropriate, present the site's archaeology.

Transportation, Access and Parking

- 6.38 Chapter 4 of the NPPF seeks to promote sustainable transport. There are a number of sections relevant to this proposal including:
- 6.39 'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel' (paragraph 29);
- 6.40 'Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion' (paragraph 30);
- 6.41 'All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether: opportunities for sustainable transport modes; safe and suitable access; development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe' (paragraph 32);
- 6.42 'Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised' (paragraph 34);
- 6.43 'Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to: accommodate efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; create safe and secure layouts; incorporate facilities for low emission vehicles and consider needs of people with disabilities by all modes of transport' (paragraph 35);
- 6.44 'Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities' (paragraph 37).
- 6.45 London Plan Policy 6.1 covers the strategic approach to transport across London, encouraging patterns and nodes of development that reduce the need to travel, especially by car, seeking to improve the capacity and accessibility of public transport, walking and cycling, supporting development that generates high levels of trips at locations with high public transport accessibility, improving interchange between different forms of transport, facilitating the efficient distribution of freight, supporting measures that encourage shifts to more sustainable modes, promoting greater use of low carbon technology, promoting walking and seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners. Policy 6.2 requires adequate provision and safeguarding of land with transport functions such as bus and rail infrastructure and coach parking should also be protected. Policy 6.3 requires development proposals to fully assess their impacts on transport capacity and the transport network, at both a corridor and local level and requires that they should not adversely affect safety on the transport network. The cumulative impacts of development on transport requirements must be

taken into account. Where existing transport capacity is insufficient to allow for the travel generated by the proposed developments, and no firm plan exists for an increase in capacity, local authorities should ensure that development proposals are phased until it is known these requirements can be met. Policy 6.9 demands secure, integrated and accessible cycle parking facilities in line with the minimum standards and Policy 6.10 seeks high quality pedestrian environments. Policy 6.11 requires DPDs and Local Implementation Plans to take a co-ordinated approach to smoothing traffic flow and tackling congestion and DPDs to develop an integrated package of land use and transport measures to foster the use of the more sustainable transport modes. When assessing proposals for increasing road capacity, Policy 6.12 supports the need for limited improvements to London's road network to address clearly identified significant strategic or local needs. When considering such improvements it also requires consideration of the contribution to London's sustainable development and regeneration including improved connectivity, the extent of any additional traffic and any effects it may have on the locality, and the extent to which congestion is reduced, how London's environment can benefit, how conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved and how safety for all is improved. London Plan Policy 6.13 states that the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. Maximum parking standards should be applied to planning applications. Policy 6.14 requires development proposals that generate high numbers of freight movements to be located close to major transport routes.

6.46 Policy SP8.4 of The Croydon Local Plan: Strategic Policies requires major development proposals to be supported by transport assessments, travel plans, construction logistics plans and delivery/servicing plans. SP8.6 focuses on improving conditions for walking and enhancing the pedestrian experience, SP8.7 seeks to provide new and improved cycle infrastructure, SP8.8 prioritises tram infrastructure provision and network improvements, SP8.9 encourages rail infrastructure provision and network improvements and SP8.10 encourages bus infrastructure provision and network improvements. SP8.12 requires the delivery of electric vehicle charging infrastructure throughout the borough, as well as car clubs and car sharing schemes (SP8.13). SP8.14 seeks to ensure enough space is provided in the Croydon Opportunity Area for taxi ranks/waiting and coach parking. In terms of car parking, SP8.15 encourages car free development in the CMC, SP8.16 seeks to limit parking spaces in the borough and aims to reduce the overall amount of surplus car parking spaces in the Croydon Opportunity Area, SP8.18 seeks to improve the efficiency with which people and goods are moved and SP8.19 promotes efficient and sustainable arrangements for the transportation and delivery of freight.

6.47 Chapter 7 of the OAPF states that efforts need to be made to mitigate the impact of growth on the transport network. This includes reducing the need to travel by co-locating homes and jobs, improving the walking and cycling environment, and improving access to, and the capacity of, public transport. This will be achieved through a mixture of hard infrastructure improvements, sustainable transport measures and softer behavioural initiatives. In planning

for Croydon's predicted level of growth, the Council's and the Mayor's planning policies have focused a large proportion of the borough's housing and economic growth within the COA. The principle of consolidating growth within the COA should help reduce the need to travel and the length of journeys. By placing homes side-by-side with new and existing workplaces, shops and other services, the OAPF aims to create a walk-able and cycle-able town centre. This report sets out further detail of the OAPF under each of the transport sub-headings below.

- 6.48 UDP Saved Policy 2013 UD12 demands the safety of all users to be maintained and the layout to be based on a series of spaces, rather than a network of roads and UD13 requires car and cycle parking to be designed as an integral part of the scheme and to minimise their visual impact. Policy T2 states planning permission will only be granted where the traffic generated can be satisfactorily accommodated on nearby roads. Policy T4 seeks the provision of cycling and cycle parking facilities. Policy T8 states that development will not be permitted unless it provides car parking in accordance with the adopted standards. These are maximum car parking standards and provision lower than the maximum will be encouraged in areas of good public transport accessibility.

Public Realm and Landscaping

- 6.49 Chapter 7 of the NPPF requires good design; it states that: 'It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes'.
- 6.50 Criteria 2 of paragraph 69 of the NPPF seeks to promote safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
- 6.51 London Plan Policy 7.1 demands the design of new buildings and the spaces they create to help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. London Plan Policy 7.5 relates to public realm, stating: 'Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate'.
- 6.52 London Plan Policy 7.3 requires routes and spaces to be legible and well maintained, providing for convenient movement without compromising security. London Plan Policy 7.6 on architecture requires development to be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. London Plan Policy 7.7 states that tall and large buildings should relate well to the form, proportion, composition,

scale and character of surrounding buildings, urban grain and public realm, improve the legibility of an area, have ground floor activities that provide a positive relationship to the surrounding streets and contribute to improving permeability. London Plan 2011 Policy 7.21 requires trees of value to be retained and any loss to be replaced.

6.53 The Croydon Local Plan: Strategic Policies SP4.7 to SP4.11 relate to public realm, requiring the Council to work with partners to improve the public realm within the borough (SP4.7), create a well-connected network of high quality, well-managed and well-maintained multifunctional hard and soft landscaped public spaces (SP4.8) and will improve Croydon's public realm to respect, enhance, create local character and distinctiveness, and integrate with the historic environment (SP4.9). SP4.14 seeks to strengthen the protection of and promote improvements to Conservation Areas and SP7.3 e) seeks to maximise opportunities for street tree planting, green roofs, green walls and green landscaping to assist urban cooling in a changing climate. The OAPF in paragraph 4.27 sets a series of outcomes that new development in the Retail Core should seek to deliver; in terms of public realm:

- Provide a high quality 24 hour publicly accessible east/west route from Wellesley Road to Old Town
- Provide new and improved east/west and north/south routes
- Enhance the streets and roads within and surrounding the Retail core area including; Wellesley Road, North End, Poplar Walk, George Street, Church Street, Church Lane, Frith Road and Tamworth Road as well as the internal routes

6.54 UDP Saved Policy 2013 UD2 requires development to address the street to provide active frontages and be based on a series of spaces defined by buildings. Policy UD14 requires all landscape associated with new development to be considered as an intrinsic part of the overall design concept and should be considered in detail at the outset. Policy UD15 requires refuse and recycling storage to be appropriately located. Policy NC4 seeks to protect trees from unnecessary harm or loss.

6.55 The revised highway layout for Wellesley Road, as discussed in the section above is likely to have a neutral impact on the Connected Croydon works that are due to be undertaken imminently. Any future planning application will need to ensure that they are retained. The highway layout proposed is such that the pavement on the western side of Wellesley Road can be no wider than 5 metres up to the site boundary.

6.56 Paragraph 5.17 of the OAPF sets principles for improving Wellesley Road to guide future development and investment in and along Wellesley Road. Those principles are:

Principle: Change the character of Wellesley Road. Incorporate a mix of activities, spaces, and facilities to help animate and better define it. Ensure that it can become a focal point at the heart of the COA. Provide a coherent and

vibrant public space. It can be used to drive regeneration and show-case Croydon's enterprising future. •

Principle: Reduce car dominance in accordance with the Public Car Parking Strategy and enhance its role as a highly accessible bus and tram public transport corridor.

Principle: Provide a more pedestrian and cycle friendly environment by ensuring new development and works, to Wellesley Road deliver improved east / west connections and an enhanced north / south environment.

Principle: Use Wellesley Road to help deliver a comprehensive and sustainable approach to infrastructure provision in the COA, including; energy, water, transport movement, drainage, services and broad-band.

Local Impact

- 6.57 One of the core planning principles in the NPPF is that decisions should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings (paragraph 17). Chapter 11 of the NPPF seeks to conserve and enhance the natural environment. It requires planning policies and decisions to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development and to recognise that development will often create some noise.
- 6.58 London Plan Policy 7.1 states that in their neighbourhoods, people should have a good quality environment. London Plan Policy 7.6 relates to architecture, stating that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings. London Plan Policy 7.7 relates to tall buildings, stating they should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference. London Plan Policy 7.15 relates to reducing noise and enhancing soundscapes and seeks to minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals, separate new noise sensitive development from major noise sources and promote new technologies and improved practices to reduce noise at source.
- 6.59 The Croydon Local Plan: Strategic Policies SP4.6 states that applications for tall buildings will be required to, in part, minimise the environmental impacts and respond sensitively to topography.
- 6.60 The OAPF in paragraph 4.27 has a guiding principle for the Retail Core that the tallest buildings should be closest to Wellesley Road away from the most sensitive locations in terms of privacy, heritage security and overshadowing.

6.61 UDP Saved Policy 2013 EP1 states that development that may be liable to cause or be affected by pollution of water, air or soil, or pollution through noise, dust, vibration, light, heat or radiation will only be permitted if the health safety and amenity of users is not put at risk and the quality and enjoyment of the environment would not be damaged or put at risk. Policy UD8 requires adequate sunlight and daylight to penetrate into and between buildings and goes on to state that regard should be had to protecting residential amenities.

Impact on Future Occupiers

6.62 Policy 3.5 of the London Plan states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in the Plan to protect and enhance London's residential environment and attractiveness as a place to live. Homes should meet dwelling space standards and be conceived and developed through an effective design process. Development proposals which compromise the delivery of elements of this policy should be resisted unless they are otherwise of exemplary design and make significant contributions towards achievement of other objectives of this Plan.

6.63 Policy 3.6 requires that children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible. Policy 3.8 states Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. All new housing should be built to 'Lifetime Homes' standards and 10% of new housing should be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

6.64 Policy 7.2 states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. Policy 7.15 sets out the Mayor's expectations with regard to reducing noise and enhancing soundscapes.

6.65 Policy SP2.6 of the CLPSP seeks to ensure that new homes in Croydon meet the needs of residents over a lifetime and contribute to sustainable communities in the borough.

6.66 Policy 3.5 of the London Plan is supported by the Mayor's Housing Supplementary Planning Guidance (adopted March 2016) together with the National Housing Standards. These provide more detailed guidance regarding the quality required from new residential development.

Sustainability and Energy

6.67 At the heart of the National Planning Policy Framework is a golden thread presumption in favour of sustainable development. It states: 'Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure'.

- 6.68 Policies 5.1-5.15 of the London Plan relate to sustainability, seeking to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. Since 2013, Policy 5.2 of the London Plan has required residential buildings to minimise carbon dioxide (CO₂) levels by 40%. By 2016, residential buildings should be zero carbon. Proposals should seek to reduce carbon dioxide emissions through the energy efficient design of the site, buildings and services. Energy assessments should reduce carbon dioxide emissions through the use of decentralised energy where feasible, such as district heating and cooling and combined heat and power. The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new development. Policy 5.9 requires major development proposals to reduce potential overheating and reliance on air conditioning systems and to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs. Policy 5.11 states that major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.
- 6.69 In sustainability and energy terms, the Croydon Local Plan: Strategic Policies applies a presumption in favour of development provided applications meet the requirements of Policy SP6 and other applicable policies of the development plan (SP6.1). SP6.2 seeks to ensure development makes the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan energy hierarchy, which includes promoting the development of district energy networks. SP6.3 seeks high standards of sustainable design and construction from new development.
- 6.70 UDP Policy UD1 requires new development to be sustainable and Policy EP16 requires new development of more than 1,000 square metres of floor space or 10 or more residential units to incorporate renewable energy production equipment to off-set at least 10% of predicted carbon emissions except where a) the technology would be inappropriate; b) it would have an adverse visual or amenity impact that would clearly outweigh the benefits of the technology; and c) renewable energy cannot be incorporated to achieve the full 10%. The policy goes on to state that where the 10% requirement cannot be achieved on major developments, a planning obligation will be sought to secure savings through the implementation of other renewable energy schemes.
- 6.71 OAPF Paragraph 4.27 sets a series of outcomes that new development in the Retail Core should seek to deliver; one of these is to connect to and help deliver a COA wide district energy system where feasible.
- 6.72 The sustainability aspects of the development have not been discussed in detail at this stage. Adopted policy requires a reduction in carbon dioxide emissions by at least 35% based on 2013 Building Regulations and also requires non-residential parts of the scheme to be constructed to BREEAM "Excellent" standards.

Sustainable Drainage

- 6.73 London Plan Policy 5.12 states that development proposals must meet flood risk assessment and management requirements. CLP1 Policy SP6.4 states that the Council will seek to reduce flood risk and protect groundwater and aquifers.
- 6.74 In accordance with the NPPF, Planning Practice Guidance and the ministerial statement published on 18th December 2014, all applicants for major developments must give priority to the provision of sustainable drainage systems (SuDS) unless demonstrated to be inappropriate. The applicant must demonstrate that the proposed minimum standards of operation are appropriate and there are clear arrangements in place for ongoing maintenance.
- 6.75 The proposed development is a major development and therefore, in line with local and national policy, the development must strive to intercept, store and attenuate as much surface water as possible, working to achieve as close to greenfield runoff rates as possible.
- 6.76 The site is located in an area designated as at low risk of flooding (Flood Zone 1) on Environment Agency Flood Maps.

Environment

Contaminated Land

- 6.77 Chapter 13 of the NPPF relates to facilitating the sustainable use of minerals and seeks to (in part) ensure that permitted operations do not have unacceptable adverse impact on migration of contamination from the site.
- 6.78 London Plan Policy 5.21 supports the remediation of contaminated sites and that the development of brownfield sites does not result in significant harm to human health or the environment and to bring contaminated land to beneficial use.
- 6.79 Croydon Local Plan: Strategic Policies 6.3 requires development to positively contribute to improving air, land, noise and water quality by minimising pollution.
- 6.80 UDP Saved Policies 2013 EP2 and EP3 seek to ensure that the land is suitable for the proposed use and require that an investigation into the extent of any possible contamination with any remedial measures is provided before any application can be determined. Policy EP3 allows for remediation to be secured via an appropriate planning condition or planning obligation if appropriate.

Air quality

- 6.81 The NPPF requires both new and existing development not to contribute to or be adversely affected by unacceptable levels of soil, air, water or noise pollution. Chapter 11 of the NPPF seeks to conserve and enhance the natural environment. It states: 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions

should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan' (paragraph 124).

6.82 Policy 7.14 of the London Plan states that the Mayor will work with strategic partners to ensure that the spatial, climate change, transport and design policies of his plan support the implementation of his Air Quality Strategy to achieve reductions in pollutant emissions and public exposure to pollution. It also states that development should be 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas). The whole of Croydon Borough has been designated as an Air Quality Management Area – AQMA.

6.83 Croydon Local Plan: Strategic Policies 6.3 requires development to positively contribute to improving air, land, noise and water quality by minimising pollution. EP1 of the UDP Saved Policies 2013 refers to the pollution of water, air or soil or pollution through noise, dust, vibration, light heat or radiation.

Noise and Vibration

6.84 Chapter 11 of the NPPF requires planning policies and decisions to: avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development; and to recognise that development will often create some noise. Chapter 13 states that when determining planning applications, local planning authorities should ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source.

6.85 London Plan Policy 7.15 seeks to minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals, separate new noise sensitive development from major noise sources and promote new technologies and improved practices to reduce noise at source.

6.86 Croydon Local Plan: Strategic Policies 6.3 requires development to positively contribute to improving air, land, noise and water quality by minimising pollution. 8.385 EP1 of the UDP Saved Policies 2013 refers to the pollution of water, air or soil or pollution through noise, dust, vibration, light heat or radiation.

Biodiversity

6.87 Chapter 11 of the NPPF relates to conserving and enhancing the natural environment. It states that: 'The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'.

- 6.88 London Plan Policy 7.19 relates to biodiversity and access to nature, stating wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity. The Croydon Local Plan: Strategic Policies SP7.4 seeks to enhance biodiversity across the borough, assist ecological restoration and address spatial deficiencies in access to nature.
- 6.89 UDP Saved Policy 2013 NC2 seeks to ensure that specially protected and priority species and their habitats are not harmed.

Wind and Microclimate

- 6.90 London Plan Policy 7.6 requires buildings not to cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings which is covered further on Policy 7.7. This states they should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference.
- 6.91 The Croydon Local Plan: Strategic Policies SP4.6 requires applications for tall buildings will be required to, in part, minimise the environmental impacts and respond sensitively to topography.

Electronic Interference

- 6.92 The NPPF in paragraph 44 requires Local Planning Authorities to ensure they have considered the possibility of the construction of new buildings interfering with broadcast and telecommunication interference.
- 6.93 Policy 7.7 of the London Plan states that tall buildings should not affect adversely their surroundings in terms of telecommunication interference.

Other Planning Matters

Access and Inclusive Design

- 6.94 Paragraph 57 of the NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development.
- 6.95 London Plan Policy 2.15 states, in part, that boroughs should promote the provision of Shopmobility schemes and other measures to improve access to goods and services for older and disabled Londoners. 7.2 of the London Plan states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. Policy 7.8 of the London Plan states that new housing must be built to 'The Lifetime Homes' standards and 10% of new housing must be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
- 6.96 SP8.6 of the Croydon Local Plan: Strategic Policies seeks to improve conditions for walking and enhance the pedestrian experience by, in part, ensuring "access for all" principles are adhered to. UDP Saved Policy 2013

UD7 seeks to ensure new development provides an inclusive environment and the Council's Designing for Accessibility SPG 10 (March 2000) demands development must be accessible to all.

Safety and Security

- 6.97 Paragraph 164 of the NPPF requires Local Planning Authorities to take into account the most up-to-date information about defence and security needs in their area and work with local advisors and others to ensure that they have and take into account the most up-to-date information.
- 6.98 London Plan Policy 7.3 and UDP Saved Policy 2013 UD6 state that the Council will require that issues of safety and security are intrinsic considerations in the detailed design and layout of buildings and spaces around them, helping to deter crime and reduce the fear of crime.
- 6.99 SP4.8 of the Croydon Local Plan: Strategic Policies seeks to create a well-connected network of high quality, well-managed and well-maintained multifunctional hard and soft landscaped public spaces.