

**PART 6: Planning Applications for Decision**

**Item 6.4**

**1 SUMMARY OF APPLICATION DETAILS**

Ref: 18/04742/FUL  
 Locations: 1-9 Foxley Lane, Purley, CR8 3EF  
 Ward: Purley and Woodcote  
 Descriptions: Demolition of existing buildings. Erection of a 5/6/7 storey building comprising 8x one bedroom, 36x two bedroom and 5x three bedroom flats. Provision of associated amenity areas, cycle parking, refuse and recycling stores.  
 Drawing Nos: 2796\_EX-SP P1, 2796\_GA-P-500-L00 P3, 2796\_GA-P-500-L01 P3, 2796\_GA-P-500-L02 P3, 2796\_GA-P-500-L03 P3, 2796\_GA-P-500-L04 P3, 2796\_GA-P-500-L05 P3, 2796\_GA-P-500-L06 P3, 2796\_GA-P-500-L07 P3, 2796\_GA-P-L00 P4, 2796\_GA-P-L01 P3, 2796\_GA-P-L02 P3, 2796\_GA-P-L03 P3, 2796\_GA-P-L04 P3, 2796\_GA-P-L05 P3, 2796\_GA-P-L06 P3, 2796\_GA-P-L07 P3, 2796\_GA-E- 01 P3, 2796\_GA-E-02 P2, 2796\_GA-E-03 P3, 2796\_GA-E-04 P2, 2796\_GA-S-01 P3, 2796\_GA-S-02 P3 and 182660-007 REV A  
 Applicant: Foxley Lane LLP  
 Agent: Icen Projects Ltd  
 Case Officer: Georgina Betts

	<b>Studio</b>	<b>1 bed</b>	<b>2 bed (2b3p)</b>	<b>2 bed (2b4p)</b>	<b>3 bed</b>
<b>Market Flats</b>	0	4	6	22	2
<b>Affordable Rented</b>	0	2	2	2	1
<b>Shared ownership</b>	0	2	0	4	2
<b>Totals</b>	0	8	8	28	5

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
0	88

1.1 This application is being reported to Planning Committee because the Ward Councillor (Cllr Simon Brew) made representations in accordance with the Committee Consideration Criteria and requested committee consideration.

**2 RECOMMENDATION**

2.1 That the Planning Committee resolve to GRANT planning permission subject to:

- A. The prior completion of a legal agreement to secure the following planning obligations:
  - a) Affordable Housing delivery
  - b) Enter into relevant Highway agreements to deliver a widened footpath and dual purpose disabled/loading bay.
  - d) Contribution towards EVCP, any relevant TMO and signing and lining associated with the inset dual disable/loading bay

- e) Restriction of Parking Permits
- f) Local Employment and Training Strategy
- g) Local Employment and Training Contributions
- h) Air Quality Contributions
- i) Carbon Off-set Contributions
- j) Relevant monitoring fees.
- k) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.

2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

### **Conditions**

- 1) In accordance with the approved plans
- 2) Details of flood prevention to be submitted and approved
- 3) Submission and approval of a piling method statement
- 4) Construction Logistics Plan/Management Statement to be submitted to and approved
- 5) A Delivery and Servicing Plan to be submitted to and approved in writing
- 6) Air quality dust risk assessment to be submitted to and approved in writing
- 7) Details of landscaping to be approved
- 8) Details of external facing materials to be approved
- 9) Details of playspace and security lighting to be approved
- 10) Travel plan to be submitted to and approved
- 11) In accordance with the air quality assessment
- 12) In accordance with the noise assessment
- 13) Mechanical plan/equipment to be 10db below the background noise
- 14) Water usage of 110 litres per head per day
- 15) 36% reduction in CO2 above the 2013 Building regulations
- 16) Grampian condition to ensure that existing crossovers are returned to highway standards
- 17) Accessible dwellings compliance with M4(2) and M4(3)
- 18) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

### **Informatives**

- 1) CIL
- 2) Site notice removal
- 3) Subject to Section 106 agreement
- 4) Croydon code of Construction
- 5) Party Wall act
- 6) Thames Water – surface water disposal
- 7) Thames Water – public sewers crossing the site
- 8) Any other informative(s) considered necessary by the Director of Planning

2.4 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or

historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.5 That, if by 15<sup>th</sup> May 2019 the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

### **3 PROPOSAL AND LOCATION DETAILS**

#### **Proposal**

3.1 This is a full planning application for;

- Demolition of the existing buildings on site
- Erection of a 5/6/7 storey building comprising of 48 flats.
- Provision of associated amenity areas, cycle parking, refuse and recycling stores.
- Extensive landscape works to include roof top gardens.
- Highway works to include the provision of an inset dual disabled parking/loading bay

#### **Site and Surroundings**

3.2 The site measures 0.16 hectares and is currently occupied by a group of 5 derelict buildings which was last occupied by a care home. The buildings are of a two storey height with hipped rooves and sit between the three/four storey commercial properties on Russell Hill Parade and the Grade II listed Library to the south-west with the Purley Baptist site beyond. The site is generally level however the land falls slightly to the south.

3.3 The site lies within a 'red route' which forms part of Transport for London's (TfL's) road network and is sited on a busy gyratory in Purley Town Centre. As such there is no parking within the vicinity of the site as surrounding roads form part of the controlled parking zone (CPZ).

3.4 1-9 Foxley Lane is an isolated section of residential uses amongst wider commercial and community uses associated within the Purley District Centre. The characteristics of the site are clearly very different to the neighbouring surroundings.

3.5 As well as the designations set out above, Foxley Lane forms part of TfL's road network, the site is within a CPZ and is at an elevated risk of surface water flooding.

3.6 Designations

- Archaeological Priority Area
- Is near a proposal site (Purley Baptist Church site)
- Is adjacent to a listed building (Purley Library)
- Place specific policy (Purley)
- Near to a Primary Shopping Area
- Near to a District Centre

## Planning History

3.7 There is no relevant planning history in relation to this site for the purposes of this application.

### 3.8 Neighbouring Sites – Purley Baptist Church

16/2994/FUL - Demolition of existing buildings on two sites; erection of 3 to 17 storey building with basements comprising 114 flats, community and church space and a retail unit on Island Site and a 3 to 8 storey building comprising 106 flats on south site and public realm improvements with associated vehicular accesses

CGI of the proposal at Purley Baptist



3.9 Planning Permission was refused by the Secretary of State for the above application. An application was lodged with the court of appeal for a Judicial Review and the Council are currently awaiting this outcome.

## 4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

4.1 There is no objection in principle to the proposal. The proposed development will bring forwards the regeneration of a derelict site and is aligned with the desire for growth within Purley Town Centre. A residential scheme is appropriate given the significant housing demand within the Borough.

4.2 The layout, height and massing has been assessed and found to be satisfactory. The appearance and detailed façade treatment of the buildings is considered to be high quality, displaying an appropriate response to the surrounding characters. Good amounts of landscaping have been included across the site and there would be an upgrade to the adjoining highway, which is supported.

- 4.3 The site would adjoin the listed Purley Library. Given the siting, form and elevational treatment of the proposed development this would have limited impact and overall is not considered to result in harm to this heritage asset.
- 4.4 There are some neighbouring buildings that are impacted in relation to sunlight and daylight levels, however, these impacts would not be to such an extent to cause an unacceptable degree of harm to existing occupiers. Outlook and privacy to neighbouring occupiers would be acceptable. The development would also not adversely impact on the future occupiers.
- 4.5 The amount of proposed development is acceptable given the mixed heights of neighbouring buildings and town centre location and is in accordance with the London Plan. However, it is noted that the density matrix should not be applied with rigidity given the Major's intention to remove the matrix in the revised London Plan. Given the context of this site, the proposal is appropriate.
- 4.6 The proposed unit mix includes a family unit provision of 68.75% and meets the Council's aspiration of providing family homes.
- 4.7 The proposal would provide 15 affordable units (which is 30% of units by habitable room), with 7 and 8 units affordable rent and shared ownership respectively. This offer has been subject to extensive viability testing and is considered to be the maximum reasonable level of affordable housing.
- 4.8 The proposed development would meet all relevant residential space standards and the provision for private and communal amenity space and play space proposed is considered to be acceptable with adequate levels of daylight provided within the flats for future residents.
- 4.9 With suitable conditions and obligations (which are recommended) to secure mitigation, the development is considered acceptable with regards to its sustainability, environmental impacts, specifically in relation to internal noise conditions, air quality impacts, dust assessments and flood risk. Microclimate impacts are also acceptable in respect of future and local users.
- 4.10 The highways impacts of the development would be acceptable. As part of detailed discussions with TfL two on site disabled bays have been omitted over fears surrounding pedestrian safety. This matter has been carefully balanced and an inset dual disabled parking/loading bay has been included as requested by TfL. Appropriate levels of cycle parking spaces are provided and highway works would be secured by condition and through the legal agreement. The lack of onsite disabled bays is considered acceptable on balance given the overall benefits of the scheme.

## **5 CONSULTATION RESPONSE**

5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

5.2 The following were consulted regarding the application:

### **LLFA (Statutory Consultee)**

5.3 No objection, subject to condition.

### **Thames Water (Consultee)**

5.4 Thames Water have not raised any objection to the proposal and have requested that should planning permission be granted conditions and informatives are added covering the following;

- Sequential approach to surface water disposal
- No piling shall take place until a piling method statement has been submitted to and approved in writing.
- Advice surrounding public sewers.

### **London Fire Commission (Consultee)**

5.5 No comments received.

### **5.6 Transport for London (Consultee)**

5.7 No objections subject to the removal of the two on site disabled bays and the provision of a dual disabled/loading bay.

### **Greater London Archaeology Advisory Service (Consultee)**

5.8 No objections and/or conditions are considered necessary given the previously developed nature of the site.

### **LOCAL REPRESENTATION**

5.9 The application has been publicised by way of a site notice displayed in the vicinity of the application site, neighbour notification letters sent to 58 adjoining occupiers and the application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 5      Objecting: 5

5.10 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

<b>Summary of objections</b>	<b>Response</b>
<i>Townscape</i>	
<ul style="list-style-type: none"><li>• Excessive height</li><li>• Out of character</li><li>• Over development</li><li>• Poor/obtrusive design</li></ul>	See paragraphs 7.3-7.12
<i>Neighbouring amenity</i>	
<ul style="list-style-type: none"><li>• Loss of privacy/light</li></ul>	See paragraphs 7.22-7.25
<i>Environment</i>	
<ul style="list-style-type: none"><li>• Increased flood risks</li></ul>	See paragraphs 7.42-7.53
<i>Highways</i>	

<ul style="list-style-type: none"> <li>• Impacts on service and delivery of nearby commercial units</li> <li>• Safety fears given the busy nature of gyratory and number of units proposed</li> </ul>	See paragraphs 7.30-7.37
<b>Supporting comments</b>	<b>Response</b>
<ul style="list-style-type: none"> <li>• Redevelopment of the site is a positive step.</li> </ul>	Agreed

5.11 Councillor Simon Brew (Objects) has made the following representations:

- Poor design
- Out of character
- Over development
- Poor light levels for new flats
- Lack of disabled parking

## 6 RELEVANT PLANNING POLICIES AND GUIDANCE

6.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2016, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

6.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in July 2018. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a sufficient supply of homes.
- Promoting healthy and safe communities
- Promoting sustainable transport;
- Making effective use of land
- Achieving well designed places
- Meeting the challenge of climate change, flooding and coastal change

6.3 The main policy considerations raised by the application that the Committee are required to consider are:

6.4 Consolidated London Plan 2015 (LP):

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Play and informal recreation facilities
- 3.7 Large residential developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities

- 3.10 Definition of affordable housing
- 3.12 Negotiating affordable housing
- 3.13 Affordable Housing thresholds
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Tall and large buildings
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise
- 7.21 Trees and Woodland
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

## 6.5 Croydon Local Plan 2018

- SP1.1 Sustainable Development
- SP1.2 Place making
- SP1.3/SP1.4 Growth
- SP2.2 Quantities and locations
- SP2.3-2.6 Affordable Homes
- SP2.7 Mix of Homes by Size
- SP2.8 Quality and standards
- DM1.1 Provision of 3 or more beds
- SP4.1-4.3 Urban Design and Local Character
- SP4.4 Croydon Opportunity Area
- SP4.5/SP4.6 Tall Buildings
- SP4.7-4.10 Public Realm
- SP4.12-13 Character, Conservation and Heritage
- DM13 Refuse and recycling
- DM15 Tall and large buildings
- DM16.1 Promoting healthy communities
- SP6.1 Environment and Climate Change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable Design and Construction



- SP6.4 Flooding
- DM23 Development and construction
- DM25.1 Flooding
- DM25.2 Flood resilience
- DM25.3 Sustainable drainage systems
- SP7.4 Biodiversity
- DM27 Protecting and enhancing our biodiversity
- DM28 Trees
- SP8.3-8.4 Development and Accessibility
- SP8.6 Sustainable Travel Choice – pedestrians
- SP8.12/SP8.13 Motor Vehicle Transportation
- SP8.15/16/17 Parking
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM42 Purley

6.6 According to paragraph 48 of the NPPF, relevant policies in emerging plans may be accorded weight following publication, but with the weight to be given to them is dependent on, among other matters, their stage of preparation. The emerging London Plan has been published for public consultation (1 December 2017 – 2 March 2018). Given the stage of preparation the policies within the emerging London Plan are given minimal weight.

6.7 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Play and Informal Recreation SPG
- Accessible London: Achieving an Inclusive Environment SPG
- Affordable Housing And Viability Supplementary Planning Guidance 2017 (August 2017)
- SPD 3 – Designing for Community Safety
- SPG Note 10 – Designing for Accessibility
- SPG Note 12 – Landscape Design
- SPG Note 17 – Sustainable Surface Water Drainage
- SPG Note 18 – Sustainable Water Usage

## **7 MATERIAL PLANNING CONSIDERATIONS**

7.1 The main planning issues raised by the application that the committee must consider are:

1. Principle of development
2. Density, Housing Mix and Affordable Housing
3. Townscape
4. Impact on adjoining occupiers
5. Quality of living environment provided for future residents
6. Transport
7. The environmental performance of the proposed building
8. Environment
9. Other planning matters

## **Principle of development**

- 7.2 The site lies within an established residential area on the edge of Purley District Centre and was last used as a care home. There is no protection for care homes within Croydon Local Plan, due to an overprovision, while residential development in this location is supported. The site is adjacent to Purley District Centre but not within the centre so a development which makes best available use of the site is considered appropriate.

## **Density, Housing Mix and Affordable Housing**

### Density

- 7.3 Policy 3.4 of the London Plan states that in taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. Based on the public transport accessibility level (PTAL 5) and the site's central characteristics, the London Plan density matrix suggests a residential density of between 650-1100 habitable rooms per hectare.
- 7.4 The residential density of the proposal would be 920 habitable rooms per ha, therefore the overall density can be supported.

### Housing mix

- 7.5 Croydon Local Plan 2018 policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms (or 2b4p within three years of the plan). The Croydon Plan states that within urban areas with a PTAL of 5 sites should achieve a 60% provision of family units. In this case, the development would provide a total of 68.75% of units being classified as family units with the mix supported by a Registered Provider; this provision is acceptable and is in accordance with policy.

### Affordable Housing

- 7.6 During the course of the application the applicant has submitted a financial appraisal of the development which has been independently assessed. The independent appraisal shows that the development could support 30% affordable housing by habitable room. This would result in 7 affordable rent units (2x one bedroom, 4x two bedroom and 1x three bedroom units) and 8 intermediate shared ownership units (2x one bedroom, 4x two bedroom and 2x three bedroom units). This offer meets the minimum percentage of affordable housing outlined in Policy 2.5 of the CLP. The appraisal has been reviewed and officers are satisfied that it has been demonstrated that this is the maximum reasonable amount of affordable housing that can be provided.
- 7.7 To support the proposed unit mix and tenure split of 53.3% to 46.7% in favour of shared ownership the applicant has submitted a supporting letter from L&Q Group to this effect. The minimum policy requirement has been met, which negates the requirement for a review mechanism. Whilst this mix leans more towards intermediate accommodation than the policy split, given the support from the Registered Provider, this is considered to meet a local housing need and represents the best mix in order to provide a good amount of affordable housing. Officers are satisfied that the

affordable housing offer overall is acceptable especially given the level of family accommodation.

## **Townscape**

### Layout

- 7.8 The existing buildings within the site cover a large proportion of the site with the site entrance from Foxley Lane. The proposal before the Committee depicts an urban form similar to the buildings it replaces be it a number of stories taller. The development would result in a positive frontage with the building line respecting neighbouring buildings and stepping back from the library to the west. Pedestrian access is maintained from Foxley Lane with a rear amenity space for future occupiers. The proposed layout respects the sites history and the urban form of the surrounding area and is supported.

### Scale, Height, Massing

- 7.9 The building has a height ranging from five to seven stories stepping up from the north-eastern and south-western boundaries to a central mass of seven stories. The height of the parapets have been kept to a minimum while the roof areas would be used for private and communal amenity areas.
- 7.10 The development would be taller than its immediate neighbours within Russell Hill Parade and Banstead Road and would be comparable to the property to the north, known as 'Sun-Rise of Purley'. The development would sit comfortably within the immediate context given the topographical changes between the north and south.
- 7.11 The gradual stepping in height offers relief from the overall massing of the development and would appear as a positive landmark building when approaching the centre from the west, marking the edge of the District Centre. Given the need for housing in the borough and the Council's aspiration of residential intensification the proposed height and massing is acceptable.

CGI's of the proposal at 1-9 Foxley Lane (left: view from Foxley Lane, right: rear view from the service road to the east)



### Appearance and connectivity

- 7.12 The principle of a two-toned brick building is supported as this reflects the character of the surrounding built form. The strong architectural punched windows which wrap around the corner of the building pick up on the evolution of Purley town centre, interpretations incorporating bold architectural elements. The two wings would be constructed in a lighter tone brick to help break down the mass and respond to the lower height buildings responding to the finer grain and rhythm of some of the buildings in the local area. The dark window frames would complement the geometric form helping to integrate the development into its setting.
- 7.13 Samples of the external facing materials would be required and secured by condition to ensure that a high quality build is delivered.
- 7.14 The development would see improvements to the public realm through alterations to the highway which include soft landscaping and resurfacing as part of these works
- 7.15 The development would be accessed directly from Foxley Lane and would not interrupt or restrict the service road to the east. Access to the rear amenity space would be through the building for the private use by residents.

### Heritage

- 7.16 The site lies adjacent to Purley Library which is a Grade II listed building. The front building line of development at 1-9 Foxley Lane sits behind the front building line of Purley Library. The use of a light toned brick in this area combined with the stepped mass and open balcony areas would ensure that the setting of the listed building is respected.
- 7.17 The relationship between the development and the library has been appropriately addressed through the siting of the development and its design, scale and massing. The scheme would result in a different relationship with the library but as set out above the scheme has responded to this context. The proposal would improve the street frontage and levels of activity along this section of Foxley Lane, which are considered

to have a positive impact on the Listed Building. Therefore overall the proposal is not considered to cause harm to the heritage asset.

- 7.18 Greater London Archaeological Advisory Service consider no further archaeological works are required, so the proposal is considered to have an acceptable impact on heritage in this respect.

### **Impact on adjoining occupiers**

- 7.19 The Croydon Local Plan policy SP4 seeks to respect and enhance character to create sustainable communities and enhance social cohesion and well-being. It ensures that the amenity of the occupiers of adjoining buildings are protected, taking into account the context of a development.
- 7.20 There are no immediate residential properties to the south-west due to the presence of the library and the Baptist church.
- 7.21 To the east neighbouring properties are located above the first floor of the commercial properties along Russell Hill Road. Given the stepped massing of the development and a separation distance in excess of 19 metres between the majority of neighbouring habitable room windows along Russell Hill Road. A habitable room at 10 Russell Hill is closer to the proposed development than the 19 metres specified above. Given the siting of the development, a degree of outlook would be maintained given the angled facades. Given the tight urban grain as a result of the town centre location this relationship is considered acceptable. The development is not considered to appear visually intrusive nor result in a loss of privacy. Balconies would be appropriately screened and would not result in a loss of privacy.
- 7.22 The neighbouring properties to the north are well separated from the development and are sited on higher land levels so would be unaffected by the development. The proposal is therefore considered to have an acceptable impact on neighbouring properties.
- 7.23 It is acknowledged that the adjacent site at Purley Baptist does not currently benefit from planning permission. However, this application has been assessed against the manner in which that site may be developed. Given the indicative layout and siting of both buildings this development is not considered to prejudice the development potential of the adjoining land should this site come forward in the future.

### **The quality of living environment provided for future residents**

- 7.24 Policy 3.5 of the London Plan states that new residential units should provide the highest quality internal environments for their future residents. 10% of new residencies should be wheelchair accessible or easily adaptable for residents who are wheelchair users. All new flatted schemes should be provided with private amenity space and playspace in accordance with Policy DM10.4 of the Croydon Plan.
- 7.25 All units meet the appropriate internal minimal size limits set out in the government's Technical Housing Standards and are provided with private amenity space in accordance with the London Plan standards and have access to a communal garden at the rear which is capable of complying with playspace standards set out in the

Croydon Plan. A small number of units would face due north with secondary windows due west, while this is not ideal these units are not single aspect. Given the size of the window openings and open nature due north this configuration is considered acceptable on balance. Details of boundary treatments, hard and soft landscaping would be secured via condition. Suitable noise insulation can be secured by condition in line with the recommendations within the noise assessment which has been viewed and supported by the Councils Environmental Health Team.

7.26 The applicant has demonstrated that 90% of the units can meet M4(2) with the remaining 10% meeting M4(3) requirements internally. This is achievable on site given the provision of a lift and the level nature of the site.

## **Transport**

7.27 The Croydon Local Plan 2018 policies within SP8 seek to promote sustainable travel choices, require new developments to contribute to the provision of electric vehicle charging infrastructure, car clubs and car sharing schemes, and encourage car free development in areas of high PTAL while still providing for disabled people. Policy DM 29 seeks to promote sustainable travel and reducing congestion by promoting measures to increase the use of public transport, cycling and walking and not have a detrimental impact on highway safety or transport network. Policy DM30 seeks to promote sustainable growth in Croydon and reduce the impact of car parking new development.

7.28 The site is located in an area with a PTAL of 5 with excellent transport links given its town centre location. The site is therefore suitable for a car free development. During the course of the application an objection was received from TfL in relation to pedestrian safety and obstruction to TfL's network from two proposed parking spaces. Having considered the detail of the application TfL concluded that there was insufficient space for disabled vehicles to turn and exit the site in a forward gear and so would reverse on to a very busy distributor road where traffic is moving in lanes and potentially queuing at lights. As such TfL requested the removal of the two on-site disabled bays to safeguard pedestrian safety.

7.29 After extensive discussions with TfL engineers and a site visit an alternative of an inset dual disabled parking and loading bay within the existing footway is proposed. These amendments also relocate existing signage and lamppost while ensuring that a minimum 2 metre wide footway is retained. This approach ensures that the busy gyratory is free of obstructions and would result in an overall improvement to highway safety, this is especially poignant given that the existing bays project into the carriageway.

7.30 The application has therefore carefully considered the provision of disabled parking in accordance with policy SP8 of the Croydon Plan within the immediate vicinity of the site and it is noted that there are two existing blue badge spaces outside Purley Library. In this particular case both TfL and the LPA have weighed pedestrian safety and the operation of the highway above that of on-site disabled parking; this is in line with the Mayor of London's 'Vision Zero' objective (a strategy to eliminate deaths and serious injuries on the road network) and is considered acceptable on balance given the overall benefits of the scheme.

- 7.31 The area previously depicted as two disabled bays will now be incorporated within the overall landscaping scheme having both flooding and streetscene benefits. This will be secured by condition.
- 7.32 A financial contribution towards the provision of EVCP's within the vicinity of the site will be secured as part of the legal agreement. In addition, the legal agreement would seek to restrict future occupiers for applying for residential parking permits.
- 7.33 The secure cycle store satisfies the London Plan requirement in terms of numbers and can be secured by condition. Adequate visitor cycle parking is also provided.
- 7.34 A Delivery and Servicing Plan (DSP), a Demolition/Construction Logistics Plan/Management Strategy and a Travel Plan would be secured via condition.

### **The environmental performance of the proposed building**

- 7.35 Policies 5.2 and 5.3 of the London Plan state that development proposals should minimise carbon dioxide emissions and exhibit the highest standards of sustainable design and construction. Croydon Local Plan 2018 policy SP6.3 seek high standards of sustainable design and construction from new development to assist in meeting local and national CO2 reduction targets.
- 7.36 The energy report identified that a total carbon dioxide saving of 36% is achievable. These savings fall short of the residential policy requirement of zero. The Council would require a financial contribution to offset the failure to meet zero carbon and this would be secured through a S106 legal agreement. The development incorporates the provision of a green roof which would seeks to address and/or mitigate co2 emissions.
- 7.37 In addition a water consumption limit of 110 litres/person/day would be secured by condition.

### **Environment**

#### Surface Water, Drainage and Flooding

- 7.38 London Plan Policy 5.3 states that development proposals should demonstrate that sustainable design standards are integral to the proposal and that major developments meet the minimum standards within the Mayor's SPG. Developers will be expected to clearly demonstrate how all opportunities to minimise final site runoff, as close to greenfield rate as practical, have been taken. Croydon Local Plan policy SP6.4 seeks to reduce flood risk, protect groundwater and aquifers and minimise all forms of flooding. Policy DM25.1 seeks to reduce flood risk and minimises the impact of flooding. Policy DM25.3 requires sustainable drainage systems in all development.
- 7.39 As the application relates to a major application a Flood Risk Assessment and Surface water Management Plan is required under Local Plan policy SP6.4 and London Plan Policy 5.12 and 5.13. FRA and a SuDS strategy have been submitted with the application and reviewed by the Lead Local Flood Authority. The Lead Local Flood Authority have considered the information and found it to be acceptable subject to the inclusion of pre-commencement conditions which require the submission of detailed drainage information. Thames Water have suggested conditions and informatives in the event that the LPA could support the proposals but have not objected to the development.

### Air pollution, noise and vibration

- 7.40 London Plan Policy 7.14 (B) states that developments should minimise increased exposure to existing poor air quality and seek to contribute to addressing local air quality problems and CLP2018 requires development to positively contribute to improving air, land, noise and water quality by minimising pollution.
- 7.41 The Councils Environmental Health Team has raised no objection to this aspect of the proposals, but does suggest that the mitigation measures identified within the air quality report should be secured by condition. Mitigation measures relate to the construction period of the development and primarily to control dust. The development is within an Air Quality Management Area and therefore a contribution is required towards local initiatives and projects in the air quality action plan which will improve air quality targets helping to improve air quality concentrations for existing and proposed sensitive receptors.
- 7.42 Being adjacent to a busy road the local noise levels are relatively high. With carefully considered noise mitigation measures such as trickle or mechanical ventilation and a traditional cavity wall construction the internal noise level can be acceptable; a condition is recommended regarding these matters.
- 7.43 As a large scale development, the construction phase would involve large scale operations and is likely to be elongated, there is the potential for adverse environmental effects, including noise if not properly controlled. Such matters would be secured through condition.

### Microclimate

- 7.44 A study of wind conditions in and around the proposed development has been conducted. This concludes that wind conditions in and around the proposed development are suitable, in terms of pedestrian comfort and safety, for use by the general public.

### **Other Planning Issues**

#### Employment and training

Croydon Local Plan policy SP3.14 and the Planning policy including the adopted Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy – Review 2017 sets out the Councils' approach to delivering local employment for development proposal. A financial contribution and an employment and skills strategy would be secured as part of the legal agreement.

### **Conclusions**

- 7.45 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.