

PART 6: Planning Applications for Decision**Item 6.3****1.0 SUMMARY OF APPLICATION DETAILS**

Ref:	19/02109/FUL
Location:	63 Whytecliffe Road South, Purley, CR8 2AZ
Ward:	Purley and Woodcote
Description:	Demolition of existing mosque and erection of mixed use mosque development comprising public worship spaces, function areas and one floor of residential use (3 x studio flats) with associated landscaping.
Drawing Nos:	PMJx1250.p0, PMJ.x.100.e1, PMJ.x.100.e2, PMJ.x.100.e3, PMJ.x.100.e4, PMJ.x.100.p1, PMJ.p.50.mp, PMJ.p.100.e1, PMJ.p.100.s1, PMJ.p.100.s1, PMJ.x.100.p0, PMJ.p.100.e2, PMJ.p.100.e4, PMJ.p20.e1, PMJ.p20.e2 Rev A, PMJ.p20.e3 Rev A, PMJ.p20.e4 Rev A, PMJ.p20.e5 Rev A, PMJ.p20.e6 Rev A, PMJ.p20.e7 Rev A, PMJ.p20.p0, PMJ.p20.p1, PMJ.p20.p2, PMJ.p20.p3, PMJ.p5.p0, PMJ.p5.p1, PMJ.p5.p2, PMJ.p5.p3, PMJ.p5.p5, PMJ.p5.p6, PMJ.p50.AC.p0 Rev A, PMJ.p100.p0 Rev A, PMJ.p100.p1 Rev A, PMJ.p100.p2 Rev A, PMJ.p100.p3 Rev A, PMJ.p100.p4 Rev B, PMJ.p100.p5 Rev A, PMJ.p100.sp, PMJ.p100.pb Rev C.
Applicant:	The Trustees of the Purley Mosque
Agent:	Mr Benedict O'Looney
Case Officer:	Samantha Dixon

	Studio	1 bed	2 bed
Existing			
Proposed flats	3		

Number of car parking spaces	Number of cycle parking spaces
1	14

- 1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission subject to the completion of a unilateral undertaking to secure the following heads of terms:
- Removal of parking permits for future occupiers
- 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. Time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
3. Construction Logistics Plan to be submitted
4. Details of site specific SuDS to be submitted prior to any development
5. Details of design of forecourt area, including CCTV, lighting, boundary treatment and hostile vehicle movement control measures to be submitted and agreed in writing following completion of a vehicle dynamics assessment and implemented prior to the occupation of the building
6. Details of building management (including handling of post, access to residential areas of the building (including residential stores), signage and ability to lock down parts of the building) and vehicular access management arrangements (including a physical barrier and control point to access the forecourt and provision for emergency service access) to be submitted to and agreed prior to commencement of development and in place prior to first occupation of the building.
7. Details of glazing and construction of the front elevation to be submitted and agreed following completion of a Blast Mitigation Impact Assessment and implemented in accordance with agreed details
8. Details of obscure glazing to windows in flank elevation to be submitted and approved prior to first occupation
9. Hard and soft landscaping including boundary treatment, retaining walls and maintenance to be submitted prior to and provided prior to first occupation
10. Full details of cycle and bin stores to be submitted to and provided prior to first use
11. Details of electric vehicle charging point to be submitted and provided prior to first occupation
12. Submission of Parking/Travel management plan for approval – and implementation prior to first occupation
13. Submission of Green Travel Plan for approval and implementation prior to first occupation
14. 19% Carbon reduction for residential development
15. Minimum of 35% CO2 reduction beyond the Building Regulations Part L (2013) for non-residential development.
16. Secured by Design to be submitted to, approved and implemented prior to first occupation.
17. External materials as on approved plans
18. Accordance with measures outlined in Acoustic Assessment and submission of other noise mitigation measures
19. No sound amplification
20. Ground floor doors in side elevation to be kept shut and used for emergency access only and no other purpose.
21. External terraces of fourth floor community hall to be kept shut and used for emergency and maintenance access only and no other purpose.
22. Restrict hours of use for communal element
23. Vehicle parking bay to be provided as specified
24. Stopping up of existing extent of vehicle crossover
25. Accord with Delivery and Servicing Plan
26. Flood resistance and resilience measures to be provided as specified in FRA
27. 110litre Water usage for residential development
28. Sound Insulation (floor/ceiling/wall) to accord with building regulation requirements

29. Noise standard for living rooms and bedrooms (proposed residential units) to accord with British Standards
30. Noise levels from Air handling units/Plant/Machinery
31. Illuminance in accordance with guidance from the Institution of Lighting Professionals
32. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Community Infrastructure Levy
- 2) Code of practise for Construction Sites
- 3) Highways works
- 4) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

3.1 The proposal includes the following:

- Demolition of existing mosque
- Erection of mixed use mosque development comprising public worship spaces, function areas and communal hall
- One floor of residential use (3 x studio flats) with associated landscaping.
- Provision of associated refuse and cycle stores and landscaping

3.2 During the course of the application amended plans and additional information has been received as follows:

- Amended floor plans
- Larger scaled drawings of elevations and plan detailing
- Transport Statement
- Delivery and Servicing Plan
- Daylight and Sunlight Assessment

Site and Surroundings

- 3.3 The site is located on the north-west side of Whytecliffe Road South. It current contains a single storey community building which has been used by the current occupiers as a mosque since 2015. The site is entirely surrounded by flatted residential development with the neighbouring buildings all significantly varying in height, scale and appearance.
- 3.4 Whytecliffe Road South is a one-way street with yellow line restrictions. Opposite the site is a bus waiting area and Purley Station Car Park. The site is located within in an area of PTAL 5 (very good) - being approximately 160 metres walk from Purley Station and only 50 metres from Purely District Centre and its primary shopping area.
- 3.5 The site falls within an area at low risk of surface water flooding with potential for groundwater flooding to occur at the surface.

Planning History

- 3.6 11/02095/P: Demolition of existing community hall and erection of a 6 and 7 storey building incorporating a community hall (D1) use on ground and lower ground floors and 8 two bedroom and 1 three bedroom flats on upper floors with associated refuse and recycling and cycle parking facilities and landscaping. Planning permission was refused on 23rd January 2012
- 3.7 12/01149/P: Demolition of existing community hall and erection of a 6/7 storey building incorporating a community hall (D1) use on ground and lower ground floors and 8x2 bedroom and 1x3 bedroom flats on upper floors with associated refuse and recycling and cycle parking facilities and landscaping. Planning permission was refused on 6th August 2012 and the subsequent appeal dismissed.



Figure 1: Aerial street view highlighting the proposed site within the surrounding street-scene

- 3.8 13/02973/P: Demolition of existing community hall; erection of a 5/6 storey building incorporating a community hall (D1) use on ground and lower ground floors and 6x2 bedroom and 1x3 bedroom flats on upper floors with associated refuse and recycling and cycle parking facilities and landscaping. Planning permission was granted on 3rd March 2014 although now works commenced and the planning permission has since expired.
- 3.9 14/05046/P: Demolition of existing community hall; erection of a 5/6 storey building incorporating 6 two bedroom and 3 three bedroom flats with associated refuse and recycling and cycle parking facilities and landscaping. This was granted planning permission on 30th January 2015 and has since expired.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the development is acceptable. The proposal creates an improved community facility in a highly accessible location close to the district centre.

- The proposed development would have an acceptable impact on the visual amenities of the area.
- On balance, the living conditions of adjoining occupiers would be protected from undue harm, subject to conditions.
- The development would provide three new residential units of an acceptable standard for future occupiers.
- The proposal would have no significant adverse impacts on the existing highway network, subject to conditions.
- Sustainability and flood risk aspects can be controlled by conditions.

5.0 CONSULTATION RESPONSE

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

Metropolitan Police Service

- 5.2 Detailed comments have been received from the Metropolitan Police, including their Counter Terrorism Security Advice service. They have provided advice following a review of any crime or terrorist risks associated with the proposed development. The majority of their advice relates to opportunities to minimise the risk of crime through the use of lighting, CCTV, access controls and other management arrangements and boundary treatments. They advise that there is risk that a place of worship could be a target for terrorist attack and have recommended measures, including the above alongside an assessment of vehicle-borne risks and other improvised explosive risks and the extent to which these will need to be mitigated. [OFFICER COMMENT: well-designed schemes should minimise the likelihood and impact of crime occurring, including terrorism and this is a material consideration. The use as a place of worship does result in the risk of it potentially being a target for such activity and conditions are recommended to control elements of the development as detailed in the report. These will need to be captured as the scheme progresses through the planning condition discharge process].

6.0 LOCAL REPRESENTATION

- 6.1 The application was publicised through the dispatch of 135 letters to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours in response to notification and publicity of the application are as follows:

No of individual responses: Objecting: 187 Supporting: 641 Comment: 3

- 6.2 All of those who objected were re-notified following receipt of the amended plans and a site notice was displayed. The number of further representations received in response to notification and publicity of the application were as follows. Any further comments received will be included as part of a subsequent addendum:

No of individual responses: Objecting: 18 Supporting: 0 Comment: 1

- 6.3 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:

Objection	Officer comment
<i>Design and appearance</i>	
Overdevelopment of the site	Addressed in Section 8.10 of this report.
Scale and appearance out of keeping/incongruous	Addressed in Section 8.9 – 8.15 of this report.
Unattractive design	Addressed in Section 8.12 - 8.13 of this report.
Minaret out of keeping	Addressed in Section 8.10 and 8.13 of this report.
Too large for the plot	Addressed in Section 8.10 of this report.
Loss of residential character	The existing building is a community facility.
Has a better appearance than the existing building. Has an attractive design.	Addressed in Section 8.9 – 8.15 of this report.
Doesn't exceed the height of adjacent building	Noted and addressed in Section 8.10 of this report.
Better use of space than the existing building	Noted
<i>Impact on amenities of neighbouring properties</i>	
Overlooking adjacent properties	Addressed in Sections 8.20 - 8.28 of this report.
Visual intrusion/overbearing	Addressed in Sections 8.20 - 8.28 of this report.
Loss of light	Addressed in Sections 8.20 - 8.28 of this report.
Daylight and Sunlight Assessment doesn't take into account the building to the rear of the site and demonstrates that the proposal will cause a loss of light to 65-57 Whytecliffe Road South	Addressed in Sections 8.20 - 8.28 of this report.
Extra noise and disturbance – acoustic report inadequate	Addressed in Sections 8.16 and 8.19 of this report. Condition proposed
Hours of use should be restricted	Addressed in Sections 8.16 and 8.17 of this report. Condition proposed
Light pollution to adjacent properties	The main prayer hall areas and located to the front of the building and service

	areas are generally provided to the rear. The residential element would have no more of an impact than existing residential properties in the area. Condition proposed to ensure luminance from the development accords with guidance from the Institution of Lighting Professionals.
Construction noise and disturbance	Addressed in Section 8.41 of this report. Condition proposed
<i>Transport and parking</i>	
Exacerbate existing traffic and parking issues	Addressed in Sections 8.33 - 8.36 of this report.
Insufficient parking	Addressed in Sections 8.33 - 8.36 and 8.38 of this report.
Well served by nearby car parks	Noted
Will cause more traffic accidents	Addressed in Section 8.34 of this report.
More cars stopping on yellow lines will block the main arterial route. Opposite bus stand. Block emergency access	Addressed in Sections 8.34 and 8.35 of this report.
Affect access to Purley Station	Addressed in Sections 8.34 and 8.35 of this report.
Inadequate parking will impact local businesses	Addressed in Section 8.34 of this report.
Expecting people to cycle is unrealistic	Cycle parking is provided in line with Draft London Plan requirement
<i>Other matters</i>	
Necessary to accommodate the growing needs of the local community	Addressed in Section 8.4 of this report.
Not just for Muslim community, provides community services for all including food bank, scouts group, mother and toddler group, exercise classes, sewing class.	Noted
Uplift local area	Noted

The existing mosque should be upgraded instead of demolished	The existing building is not large enough for the needs of the existing users.
Inadequate outlook for Flat A	Addressed in Section 8.29 of this report.
Result in loss of living accommodation	The existing building has a community use (no residential)
Purley already overdeveloped with flats	The main use of this development is community use.
Does not minimise pollution contrary to SP6.3 and DM16. No consideration of renewable energy	Addressed in Section 8.44 of this report. Condition proposed
Net loss of land value for residential homes. Will destroy property values	Not a material planning consideration
Not in keeping with the local culture of Purley	The development would provide enhanced amenities for the needs of the local community.
Disturbance to existing Muslim worshippers	The application is proposed by the current occupiers of the site

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 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 2015, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. 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:

- Ensuring the vitality of town centres
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places

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

7.4 Consolidated London Plan 2015

- 2.15 Town centres
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.16 Protection and enhancement of social infrastructure
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture

7.5 Croydon Local Plan 2018

- SP2 - Homes
- DM1 - Housing choice for sustainable communities
- DM8 – Development in edge of centre and out of centre locations
- SP4 – Urban Design and Local Character
- DM10 - Design and character
- DM13 - Refuse and recycling
- DM16 – Promoting healthy communities
- SP5 – Community Facilities
- DM19 - Providing and protecting community facilities
- SP6 – Environment and Climate Change
- SP6.3 - Sustainable Design and Construction
- DM23 - Development and construction
- DM25 – Sustainable drainage systems and reducing flood risk
- SP7 – Green Grid
- DM27 – Biodiversity
- SP8 – Transport and communications
- DM29 - Promoting sustainable travel and reducing congestion
- DM30 - Car and cycle parking in new development
- DM42 – Purley

7.6 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Croydon Suburban Design Guide Supplementary Planning Document April 2019

7.7 Emerging New London Plan

- 7.8 Whilst the emerging New London Plan is a material consideration, the weight afforded to it is down to the decision maker, linked to the stage a plan has reached in its development. The Mayor's Intend to Publish version of the New London Plan was submitted to the Secretary of State who has now issued a direction and one awaits to hear how the London Mayor responds. The New London Plan remains at an advanced stage of preparation but full weight will not be realised until it has been formally adopted. Despite this, significant weight can be applied to those policies to which the Secretary of State has not directed modifications to be made.
- 7.9 For clarity, the Croydon Local Plan 2018, current London Plan (incorporating alterations 2016) and South London Waste Plan 2012 remain the primary consideration when determining planning applications.

8.0 MATERIAL PLANNING CONSIDERATIONS

- 8.1 The main planning issues raised by the application that the Planning Committee are required are as follows:
1. Principle of development
 2. Townscape and visual impact
 3. Residential amenity for neighbours
 4. Housing quality for future occupiers
 5. Access and parking
 6. Landscaping and ecology
 7. Sustainability and environment
 8. Other matters

Principle of Development

- 8.2 Paragraph 92 of the NPPF states that to provide the social, recreational and cultural facilities and services the community needs, planning decisions should positively provide community uses (including meeting places, cultural buildings and places of worship) to enhance the sustainability of communities and residential environments. London Plan Policy 3.16 states that social infrastructure facilities should be accessible to all sections of the community and be located within easy reach by walking, cycling and public transport and that the multiple use of premises should be encouraged.
- 8.3 Croydon Local Plan 2018 (CLP) Policy SP5 states that there is a presumption in favour of community facilities and SP5.6 outlines that the Council will support and enable the provision and improvement of places of worship. DM19.2 advises that the Council will support applications for community use where the proposals include buildings which are flexible, adaptable, capable of multi-use and are accessible to local shopping facilities, healthcare, other community services and public transport or provide a community use in a location and of a type that is designed to meet the needs of a particular client group.
- 8.4 The proposed development seeks to improve and expand the existing community use at the site. The existing building is inadequate for the needs of the community it serves, in terms of its size and access for individual users (e.g. women and the disabled). The scheme would provide enlarged prayer hall facilities, including a designated space for women as well as space for teaching and community group activities. A further community spaces (at fourth and lower ground floor level) is also proposed which could facilitate wider community functions.

- 8.5 The proposed use of the site is entirely supported by National, London and Local Plan policies. The site is located in easy access of good public transport links and Purley District Centre.
- 8.6 As well as the community use, the scheme proposes to provide 3 residential units. CLP Policy SP2.1 states that in order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of development of new homes. The “Places of Croydon” section of the CLP identifies that the main focus of major residential growth in Purley will be in and around the District Centre with high quality residential development that would respect the existing residential character and local distinctiveness. The application proposes additional homes within the borough in a sustainable location which the Council is keen to promote and as such the principle of the residential element of the development is also supported.

Townscape and Visual Impact

- 8.7 CLP Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys whilst respecting a) the development pattern, layout and siting; b) the scale, height, massing and density and c) the appearance, existing materials and built and natural features of the surrounding area. Policy DM42.1 states that within Purley District Centre and its environs, to ensure that proposals positively enhance and strengthen the character and facilitate growth, developments should 1) reinforce the continuous building line which responds to the street layout and include ground floor active frontages; 2) complement the existing predominant building heights of 3 to 8 storeys, and c) demonstrate innovative and sustainable design, with special attention given to the detailing of frontages.
- 8.8. The existing building on site does not hold any significant architectural merit and therefore there is no objection to its demolition. The principle of its demolition was established under the previous permission (LBC Ref 14/05046/P).
- 8.9 As evidenced in the photos below, the site is surrounded by taller buildings of varying scale, height and character. In this particular location there is no clear established character or building typology. The flatted block immediately to the south west comprises 6 storeys and has a flat roof contemporary appearance with a multi-storey car park beyond. To the rear is a 3 storey flatted block with a mostly flat roof. To the north-east of the site lies 65-67 Whytecliffe Road South which was a previous office - now in residential use comprising 2-3 storeys with a pitched roof. The adjacent Azalea Court is 3-4 storeys with a pitched roof. The only real feature linking the buildings is the use of red/brown brick to the elevations



Figures 2 and 3: Images of existing buildings surrounding the site.

8.10 It is proposed to erect a 6 storey building (the lower ground floor not being visible from the street-scene) on the site to accommodate the expanded community and residential use. The height of the proposed building has been largely derived out of the massing of the previously approved scheme at the site as can be seen in Figure 4 below. The height would sit below that of the adjacent building to the south west and the inclusion of the minaret feature would give the proposed building a more vertical appearance, with the development seeking to optimise the use of this brownfield site, located within a highly sustainable location.

Front elevation of approved application (14/05046/P)



Front elevation of new Mosque proposal

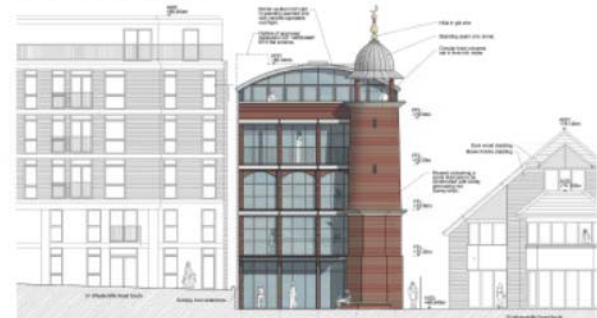


Figure 4. Proposed front elevation in comparison to previous planning permission (LBC Ref 14/05046/P)

- 8.11 The front building line would align with the front of the adjacent building to the south west with the minaret protruding further forwards, thereby providing a marker within the street-scene. The positioning of the building would respect that of the established building line on this side of Whytecliffe Road South.
- 8.12 The building has been designed to provide for the functional needs of the users and to blend into the surrounding area as far as possible. The external material pallet has been chosen to respond to the more traditional decorative brick buildings found in Purley Town Centre.
- 8.13 The minaret is a main feature of the building and has been designed to have a strong and prominent presence in the street scene. It provides a symbolic reference to the main use of the building and is connected to the main building, providing the main access point for women and an emergency staircase. The elevations would be heavily glazed with the curved roof profile, set back from the front façade, to limit its visual impact. The rear elevation would also incorporate a curved bay to the rear. Like the other buildings, the use of brickwork to the elevations will tie the building into the street scene.



Figure 5 and 6. CGI images of proposed building

- 8.14 To the front of the building, the site is proposed to be hard landscaped. This again is to fulfil the functional needs of the use, including pedestrian access, the provision of an off-road parking bay for deliveries and servicing alongside providing space for cycle and bin stores. The frontage has been designed with decorative paving and a reflecting pool, designed to enhance the appearance of the frontage in comparison to the existing. It is considered that soft landscaping should be incorporated in to this area of the proposal.
- 8.15 This area is where some congregation of attendees could occur as people move in or out of the building. The area is also the location where there might be some risk of crime and sadly, terrorist threats. Mitigating this risk can be achieved by making crime less likely to occur by ensuring the area is actively and passively overlooked and well-lit with controlled access to the building, including the residential elements. Planning conditions are recommended to ensure these matters are suitably accommodated.
- 8.16 In view of the nature of the proposed use there is also some risk from vehicle or other improvised explosive devices and hostile vehicle movements (deliberately overrunning the forecourt area by vehicle). This can be mitigated through the use of reinforced boundary treatments along the front and side boundaries of the forecourt, following an assessment of how such an event could occur. The safety and security of users of the forecourt needs to be balanced against other elements of the design of this area, such as its visual appearance, accessibility of the forecourt area for deliveries, servicing and disabled drop off and impact on the character of the area. A planning condition is therefore recommended to secure the detailed design of the forecourt area, including the front and side boundary treatments, materials and vehicular access arrangements, following completion of a Vehicle Dynamics Assessment. Other measures to reduce risk such as ensuring that the glazing at the front of the site has been assessed and designed to a specification to reduce its risk of injury following a blast, alongside measures to handle post and building management more generally are proposed to be managed through the use of planning conditions.
- 8.17 Overall, whilst the proposed building would have a unique appearance, it would respect existing building lines and height and the use of external material would ensure it complies with the objectives of the above policies in terms of respecting local character.

Residential Amenity for Neighbours

Noise and Disturbance

- 8.18 The existing building is not adequate for the needs of the current users. The internal space is too small to accommodate the congregation at main prayer times and users often have to assemble outside of the building. Whilst supporting information from the applicant advises that the building is capable of accommodating 200 people, during Friday Prayers and during Ramadan, approximately 400 people might well attend. Moreover, there are currently no separate areas for men and women, meaning that the building is not functional for all the Islamic community. The main purpose of the proposed building is to provide additional accommodation for the needs of the current congregation in the form of larger and separate prayer halls and entrances for men and women and space for educational purposes and community groups that also currently use the hall. It is therefore positive that all activities would be able to be contained within the building. Given that the existing building has been operating for 5

years, it would be suitable for the premises to be used for religious practices for the similar hours as existing.

8.19 As well as the prayer halls at the lower levels, the application also proposes a community hall on the upper storey that could potentially be used by the wider community. Whilst an external terrace was originally proposed in association with this hall, officers were concerned that this could cause unacceptable noise disturbance to adjacent residents. The terrace is now proposed to be used for emergency purposes only which would be secured by condition. Given that the hours of use for the religious purposes of the building are wide ranging (to accommodate Islamic prayer times) it is considered prudent to limit hours of the fourth floor community hall use (more stringently) in order to protect the adjacent residential occupiers. Environmental Health have recommended these hours be restricted to those of other community uses in Purley centre (Monday to Saturday 07:00 to 23:00, Sunday 08:00 to 21:30 and Bank Holidays 08:00 to 20:00).

8.20 An Acoustic Assessment has been produced that provides some limited detail of noise control measures. The Council's Environmental Health Team have required that the measures contained in the assessment are secured by planning condition. As well as this, they have requested that for all communal areas of the building, if amplified music or speech is to be played, then sound insulation should be provided to ensure that no nuisance is caused to neighbouring residents. Such measures should include:

- Adequate noise insulation to all exit doors, windows and walls;
- Exit doors and windows should remain closed while any of the halls are in use and adequate alternative ventilation should be provided to ensure these doors and windows remain closed;
- A noise limiting device should be fitted to the electrical supply, which will cut out the supply to amplified music if noise levels exceed a certain level, which would be agreed with the Council;
- A cut-out device fitted to exit doors so that if they are opened, the electrical supply to amplified music is ceased;
- Strict management of the premises will be necessary in order to minimise noise from persons entering and leaving.

A noise management plan shall be required to be submitted by condition to specify the requirements and controls for this.

8.21 Doorways are shown to be provided into the ground floor hall in the side elevation of the building and the agent has confirmed that these are for emergency access only. Any permission would be conditioned to ensure the doors are kept shut and only used in case of emergency. A condition is also recommended to ensure that the minaret only has a symbolic function and is not used for call to prayer and that there is no sound amplification outside of the building.

8.22 The main residential properties that would be affected by the proposed development are flats at 53 Whytecliffe Road South, flats at 65-67 Whytecliffe Road South and block to the rear 55-59 Whytecliffe Road South.

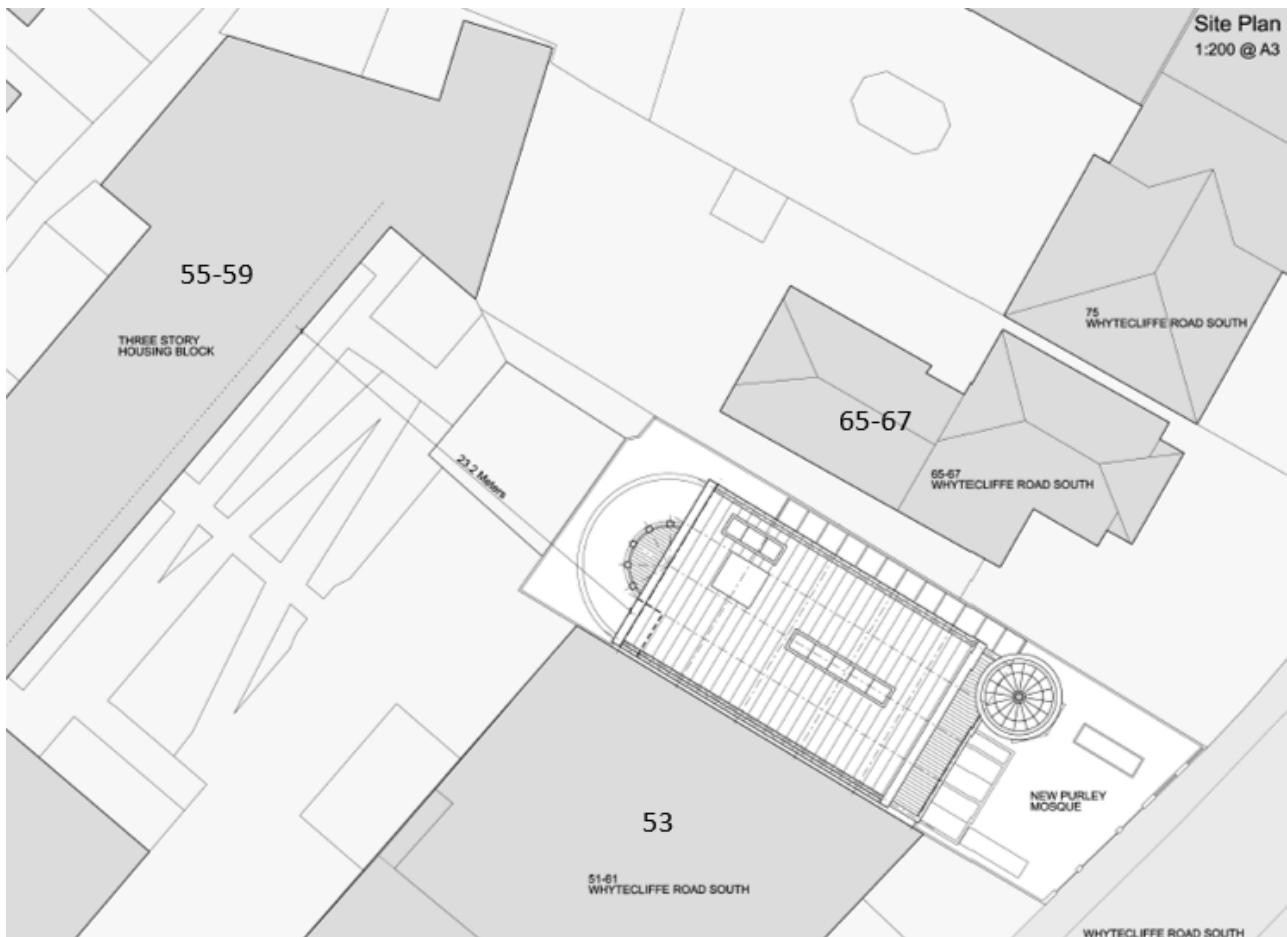


Fig 4: Plan highlighting the relationship with the adjoining occupiers.

Flats at 53 Whytecliffe Road South (to south west)

- 8.23 This 6 storey building abuts the site to the south west. There are no windows in its side elevation but there are windows and balconies to the front and rear, immediately adjacent to the development site. The proposed building would sit in line with the front elevation of this neighbouring property. To the rear and as originally submitted, the development encroached into the 45 degree angle, viewed from the middle of the balconies of the adjacent development which was deemed to be unacceptable, causing harm in terms of visual intrusion. The building depth have been reduced (adjacent to 53 Whytecliffe Road South), ensuring that no part of the building would encroach into the 45 degree angle. The windows in the rear semi-circular bay would not directly face any private amenity areas or windows and therefore the proposal would cause no loss of privacy to this neighbouring property.
- 8.24 A Daylight/Sunlight Assessment has been submitted that shows there will be some daylight transgressions to 2 bedrooms in this block (daylight distribution inside the rooms) although one of these transgressions would be very marginal. All widows are acceptable in terms of the vertical sky component test. Bedrooms are considered to be less sensitive than main living spaces and overall, this transgression would not be so significant to suggest that planning permission should be refused.

65-67 Whytecliffe Road South

- 8.25 Whilst this building originally provided office accommodation, since the previous planning permission was granted in January 2015 (LBC Ref 14/05046/P) the building has been converted to residential use under permitted development rights (LBC Ref 17/06410/GPDO).
- 8.26 The proposed development would not encroach into the 45 degree angle from the front or rear windows of this neighbouring property. There is an entrance to the existing mosque to the side of the existing building (adjacent to the boundary with 65-67 Whytecliffe Road South). An access would be re-provided in a similar location, with a glazed canopy over and it is considered that this would have no more of an impact on the adjacent properties than the existing situation. There are currently a number of clear glazed windows contained within the side elevation of the mosque from which one can directly see into the side facing windows of 65-67 Whytecliffe Road South. Whilst it is noted that there are a lot of windows proposed in the side elevation, it is proposed that they all be obscure glazed to limit harmful loss of privacy and full details can be secured by condition. As noted above, the ground floor doors in this side are proposed for emergency access only and would be conditioned to remain closed (except in case of emergency). The rear windows would allow oblique overlooking of the communal garden of 65-67 Whytecliffe Road South. The SDG outlines that communal gardens are less protected than private gardens and it is noted that this area is more directly overlooked by the existing flatted block to the north.
- 8.27 The side facing windows to 65-67 Whytecliffe Road South serve bathrooms and bedrooms for the flats to the rear and serve a secondary window to the studio flats that face towards the front of the site. It was noted at the planning officer's site inspection that given the current layout of development across the sites (where access to the mosque and windows already face the residential units - which were created after the mosque use was established) occupiers of these units tend to keep curtains closed for the majority of the time (day as well as night). A Daylight/Sunlight Assessment has been submitted which has concluded that that daylight would be reduced to four of these windows, three of these are bedroom windows and one is a secondary window which is also served by a window in the front elevation. As noted above, bedroom windows are considered to be less sensitive than main habitable spaces and further, the occupiers often leave the curtains closed. Whilst one of the units would experience a loss of sunlight to the side facing window, this is secondary to the window in the front elevation with sunlight already restricted by an existing overhang. The Suburban Design Guide refers to un-neighbourly windows which directly face out onto an application site. The windows place undue restraints on the development and as such, the light and outlook they receive does not enjoy as much protection as would have otherwise been the case. Given the SDG advice and the current situation between the sites, it is not considered that the impact on the side windows to these flats would be so severe to suggest that planning permission should be refused. In any case, BRE guidance suggests that some loss of light infringements might well be acceptable in built up situations such as this.

Block to rear (55-59 Whytecliffe Road South)

- 8.28 This three storey block is situated to the rear of the application site, separated by a bin store structure that appears to serve the apartment block. At its closest point the proposed building would be 20.5 metres from existing rear windows of this neighbouring apartment block and as such, should maintain reasonable levels of privacy for existing neighbours. The relationship of the proposed building to this

neighbouring block would be very similar to the existing situation found between 53 and 55-59 Whytecliffe Road (in terms of the distance between buildings and building height) and as such, officers are satisfied that the proposal should have no significantly adverse impact by way of causing any undue loss of outlook.

- 8.29 The submitted Daylight/Sunlight Assessment has not assessed the impact of the development on this block. However, given that the height and distance would be similar to that found with 53 Whytecliffe Road South, the impact would not be significantly different than the current situation. Moreover, the impact would also be similar to the permission that was granted in 2015 on the site and in that case the impact was considered acceptable.
- 8.30 Overall, the development would cause no unduly harmful impact on any adjacent residential properties.

Housing Quality for Future Occupiers

- 8.31 The proposed residential units would meet internal dimensions required by the Nationally Described Space Standards (NDSS) for 1 bedroom 1 person units; the quality of proposed internal amenity space is considered acceptable.
- 8.32 With regard to external amenity space, the London Housing SPG states that a minimum of 5 square metres of private outdoor space should be provided for 1-2 person dwellings. Whilst two of the units have external balconies which would exceed this requirement, the amenity space for the rear unit would be 3 square metres – although the terrace would provide a depth of 1.5 metres which would be usable. On balance, given that the units are for single occupancy and likely to be occupied in association with the mosque use, the space provided would be acceptable. It is also noted that the space would be comparable with the size of the balconies found with the adjacent building.
- 8.33 In terms of accessibility, step-free access would be provided – with a lift provided to all levels.
- 8.34 The proposed residential use would have communal uses above and below. As such sound insulation to Building Regulation Requirements should be provided between the separating floors of the premises to ensure appropriate noise levels for the new residents.

Parking and Access

- 8.35 The site has a PTAL rating of 5 which means that it has very good access to public transport links. It is approximately 160 metres walk from Purley Station and only 50 metres away from Purely District Centre and primary shopping area. Whytecliffe Road South is a one-way street in the Controlled Parking Zone (CPZ) which is operational from Monday to Saturday 9am-5pm. The site has an existing vehicle access.
- 8.36 A Transport Statement (TS) has been provided which assesses any new impacts from the proposed development. Existing parking requirements during the busiest time for the Mosque (during Friday prayers) are for the majority of the period contained off street in local car parks. This is likely to continue into the future. The proposed development will continue to host the same events as existing and the TS outlines possible increases in users as a result in the additional space provided in the building.

The resultant impacts on the local road network have been shown to be minimal and would be outside the main morning and peak hours. As such, the impact on the flow of the highway network is considered to be acceptable.

- 8.37 The TS outlines that staff members monitor parking activity on Whytecliffe Road South to ensure visitors do not park informally and block traffic. Despite this, local residents have raised much concern, stating that vehicles stop on the highway and block traffic on the one-way street. Officers consider that a formal travel/parking management plan should be put in place and enforced and full details of how this will be achieved should be approved by condition.
- 8.38 It is noted that the majority of existing users travel to the mosque by private car. The development should promote sustainable travel options and as such, details of and adherence to a Green Travel Plan for staff and visitors will be secured by condition.
- 8.39 An informal parking bay is proposed to the front of the building to enable delivery/loading, servicing and disabled access. This space will enable essential servicing to take place off the highway. There is existing vehicular access to the site and therefore manoeuvring into and out of the site will have no more of an impact than the current situation. This bay should be provided with an Electric Vehicle Charging Point, the details of which will be secured by condition.
- 8.40 No parking provision is proposed for the 3 residential units. Given the highly sustainable location of the development in the CPZ and that the units would be single occupancy, car free residential development would be entirely appropriate. Access to resident parking permits will need to be restricted – controlled through a Unilateral Undertaking.
- 8.41 Cycle parking is provided for visitors of the scheme in the form of Sheffield stands on the front forecourt. The amount proposed would accord with Draft London Plan requirements. Whilst cycle parking for the residential units is also shown to be provided on the front forecourt, it is not covered and the only security is in the form of CCTV cameras. Officers are of the opinion that this layout could deter use by residents and consider that a more secure storage solution should be provided. Details of the cycle store for residents will therefore be requested by condition.
- 8.42 Bin storage is also located to the front of the site adjacent to the side boundary. The store is separated for the commercial and residential uses and is in a position that would be easily collectable by refuse operatives.
- 8.43 A Construction Logistics Plan (CLP) will need to be submitted and approved by the local planning authority by condition.

Trees, Landscaping and Ecology

- 8.44 As existing, there are no trees or any soft landscaping at the site and it is noted that there is little scope within the site to provide any meaningful soft landscaping. The applicant has amended the lower ground floor plan and shown a small amount of soft planting in the rear courtyard. Full details of hard and soft landscaping including future maintenance will be secured by condition.

- 8.45 Ecology – The site is entirely hard surfaced and is not located near an area of special scientific interest or a site of nature conservation value. As such, it is not considered likely to support protected species' habitat. An informative would be included on any decision making the applicant aware that it is an offence to harm protected species or their habitat and in the event that protected species are found on site the applicant should refer to Natural England standing advice.

Environment and Sustainability

- 8.46 In order to accord with CLP Policy SP6, conditions can be attached to ensure that the residential element of the scheme achieves a 19% reduction in CO2 emissions over 2013 Building Regulations and that mains water consumption would meet a target of 110 litres or less per head per day. The non-residential development will need to achieve a minimum of 35% CO2 reduction beyond the Building Regulations Part L (2013).
- 8.47 The site is located within a critical drainage area with potential for groundwater flooding to occur at the surface. A Flood Risk Assessment has been submitted that outlines flood resilient construction techniques that will be incorporated into the lower ground and ground floors of the building. These measures can be secured by condition and include:
- Where feasible and appropriate, tanking of the lower ground flood
 - Non-return valves / suitable pump to be fitted in order to prevent sewer surcharging
 - Flood resilient building materials and fittings
 - New power sockets raised above 300mm
- 8.48 The site is in an area at very low risk of surface water flooding and the development will not result in an increase in hardstanding areas. CLP Policy DM25 requires sustainable drainage techniques to be incorporated into all development. The FRA outlines that the site has potential for simple rainwater attenuation in the form of a water butt. Whilst it is acknowledged that the site is constrained in size, officers consider that further consideration of other possible SuDS measures should also be explored. This should include a full assessment of the underlying ground conditions to explore measures such as use of permeable paving or soakaways – especially in the front forecourt. This further assessment will be required by condition.

Other matters

- 8.49 The residential part of the development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area.

Conclusions

- 8.50 The principle of provision of improved community facilities and residential development is welcomed in this highly sustainable location. The development would not have an adverse impact on the character of the area. Subject to conditions, the development would have an acceptable impact on the amenity of adjacent residential properties, would not cause any harm the highway network and is able to properly mitigate any risks associated with crime and safety (including ant-terrorist mitigation). The proposal is therefore considered to be in accordance with the relevant policies.

8.51 All other relevant policies and considerations, including equalities, have been taken into account.