

PART 6: Planning Applications for Decision

Item 6.4

1 SUMMARY OF APPLICATION DETAILS

Ref: 20/06224/FUL
 Location: 922 - 930 Purley Way, Purley, CR8 2JL
 Ward: Purley and Woodcote
 Description: Demolition of existing 5 residential dwellings and erection of residential development formed of 3 blocks of flats ranging from 6 - 12 storey's comprising 155 flats with associated land level alterations, landscaping, access, cycle and car parking
 Approved: See Appendix 1
 Documents:
 Applicant: Justin Homes (Purley Way) Ltd
 Agent: Icen Projects Ltd
 Case Officer: Tim Edwards

	1 bed		2 bed		3 bed		4 bed +	Total
	1p	2p	3p	4p	4p	5p		
							5	5
Market Housing	11	61		36		3		
Affordable Rent		5		4	4	1		
Intermediate		16		8	3	3		
All Tenures	93		48		14			155

Number of car parking spaces	Number of cycle parking spaces
6 Blue Badge	262 (258 long stay and 4 short stay)

1.1 This application is being reported to Planning Committee in accordance with the Committee consideration criteria:

- The scheme was referred by Councillor Quadir (Ward Councillor)
- The scheme was referred by the Director of Planning and Strategic Transport

2 BACKGROUND

2.1 An earlier iteration of this proposal was presented to the Planning Committee at pre-application stage on 22nd October 2020. This proposed the erection of 3 blocks ranging from 6 – 14 storeys, 149 units with associated land level alterations, landscaping, access, cycle and car parking.

2.2 The main issues raised were as follows:

Landscape

- There was general concern expressed by Members regarding the height of Block A. There was support for the place review panel suggestion to reduce the height of the front from building Block A, with more work to be done on how it fits within the landscape to contribute the gateway and exit of Purley.
- Members supported the local space and play space provisions and were reassured with the quality and how it operated between the blocks, public accessibility and seating.

Adjoining Occupiers

- There were concerns expressed with the development of Block C on the detached unit to the north, and the 45 degree compliance rule, separation and the daylight and sunlight assessment.

Character and Design

- There was a request for more information on the individual and cumulative impact of the development on amenity, character and infrastructure.
- Members stated they would like further insight to the treatment of the façades and whether Block A should have a unique architectural finish or more uniform to Block A, B and C.
- Some Members were satisfied that this was in a sustainable location, though there was tension noted with the landmark building for Purley as set out in the Croydon Local Plan 2018. Other Members questioned whether there was a market appetite for the volume of 1-bedroom homes in Purley.

Wheelchair Accessibility

- There was support for the 10% wheelchair provision compliance and encouragement to exceed the requirement.

Affordable Housing

- The 35% was broadly supported by Members, with some Members keen to see more of an increase of the 35% policy compliance.

Living Conditions

- There were concerns across the Committee with the mix of the units. Members welcomed more family units beyond the 2 bed 4 person unit provisions in the local plan.

Car Parking

- There was appreciation to the parking provided for occupants and the self-employed.

Other:

- There was concern that there was no provision for the proposed loss of 24 trees.

2.3 The scheme was presented to the Place Review Panel (PRP) on two occasions during the pre-application stage. The main issues raised by the Panel following the second discussion were as follows:

- The Panel agree that Blocks B and C are working more successfully than Block A at present.

- It is recommended to reconsider the overall massing strategy; exploring a transitional height of 12-8-6 storeys. Block A footprint should be simply extruded with no horizontal split to the massing as this will emphasize its strong form and corner condition, and reduce any sense of a “thin” facade.
- The Panel reiterates that Block A will need to be of exceptional architectural quality in order to justify its height. The scheme should aspire to match the quality of architecture of Purley Baptist Church on its own terms.
- The Panel are not convinced that the vertical splits and contrasting brick tones in all the buildings are helpful in breaking up the massing. More subtle alternatives should be tested.
- Further work is needed regarding the Base, Middle and Top articulation throughout the scheme, and how this relates to the character of Purley.
- The Panel are broadly happy with the emerging landscape design; however they stressed that play areas etc. should be publically accessible in order to “give back” to the existing residents of Purley.
- The Panel encourages the Applicant to further consider the interface between architecture and landscape and how this can be enhanced to create an integrated design.
- The Panel also encourages further consideration of the blank ground level frontages on Purley Way.

2.4 Since the Committee and presenting to the PRP, the proposal has been further developed in consultation with officers and the above comments (where possible) have been addressed in amendments and additional justification provided for the scheme.

3. RECOMMENDATION

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

- A. Any direction by the London Mayor pursuant to the Mayor of London Order
- B. The prior completion of a legal agreement to secure the following planning obligations:
 - 1) 35% Affordable Housing provision (30% London Affordable Rent, 70% London Shared Ownership)
 - 2) Air quality contribution of £15,500
 - 3) Local employment and training strategy (construction) including a financial contribution of £95,000
 - 4) Zero Carbon off-set contribution of £71,759
 - 5) Sustainable transport contributions including towards off-site car clubs and car club memberships for future occupiers of £112,500
 - 6) Car parking permit free restriction for future residents
 - 7) Travel Plan and monitoring
 - 8) Public realm and highway works to ensure safe ingress and egress onto Purley Way
 - 9) Section 278 agreement

- 10) Green Travel Plan
- 11) Retention of scheme architects (or suitably qualified alternative architect)
- 12) TV and digital mitigation
- 13) Monitoring fees and payment of legal fees
- 14) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

3.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate detailed terms of the legal agreement, securing additional/amended obligations if necessary.

3.3 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) Commencement within three years (compliance)
- 2) Approved Plans (compliance)
- 3) Construction and Environmental Management Plan (prior to commencement)
- 4) Archaeology (prior to commencement)
- 5) Biodiversity – bat survey (prior to commencement)
- 6) Contamination (prior to commencement)
- 7) Remediation Strategy (Prior to commencement)
- 8) Public art (prior to commencement)
- 9) Wind tunnelling and mitigation measures outlined for landscaping scheme (prior to commencement)
- 10) Aviation warning lights, construction and on building (prior to commencement)
- 11) Typical façade materials/detailing – 1:20 details used to produce 1:1 mock-ups, with 1:5 details to confirm following approval (prior to superstructure)
- 12) External facing materials, including physical samples and detailed drawings of design elements – including interim wind break (prior to superstructure)
- 13) Sample panels on site (prior to superstructure)
- 14) Balcony and balustrading design (including those requiring additional wind mitigation owing to their location) (prior to superstructure)
- 15) Hard and Soft Landscaping details of all Public Realm, communal amenity spaces and Children’s Play Spaces (prior to superstructure)
- 16) Biodiversity enchantment strategy including lighting design. (prior to superstructure)
- 17) Landscape and public realm management plan(prior to occupation)
- 18) Flues and Ventilation (prior to occupation)
- 19) Façade maintenance and cleaning strategy (prior to occupation)
- 20) Landscape and public realm management plan (prior to occupation)
- 21) Biodiversity (prior to occupation)
- 22) Public Realm and External Building Lighting (prior to occupation)
- 23) Delivery and Servicing (prior to occupation)
- 24) Car Park management plan (prior to occupation)
- 25) Refuse storage (prior to occupation)
- 26) External Noise Mitigation (prior to occupation)
- 27) Hard and Soft Landscaping details of Public Realm, Roof Top Amenity Spaces and Children’s Play Spaces (prior to occupation)
- 28) Piling (prior to specific works)

- 29) Step free access to all amenity spaces shall be provided to all future occupiers regardless of tenure (compliance),
- 30) The 'pocket park' between Blocks B and C shall be publicly available (compliance)
- 31) Detailed Surface Water Drainage Scheme (compliance)
- 32) Tree Protection (compliance)
- 33) Water use (compliance)
- 34) Noise limits (plant) (compliance)
- 35) Secured by design (compliance)
- 36) Accessible Homes (M4) (compliance)
- 37) Lifts (compliance)
- 38) Electric charging (compliance)
- 39) Cycle Storage (compliance)
- 40) All features and materials must comply with Part B of the Building Regulations in relation to fire safety (compliance)
- 41) Submitted Air Quality assessment (compliance)
- 42) Thames Water (Protection and upgrade of water supply infrastructure)
- 43) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

Informatives

- 1) Granted subject to a Section 106 Agreement;
- 2) Community Infrastructure Levy;
- 3) Code of practice for Construction Sites;
- 4) Nesting birds in buildings/trees;
- 5) Light pollution;
- 6) Requirement for ultra-low NOx boilers;
- 7) Thames Water informatives regarding underground assets and public sewers;
- 8) Highways informative in relation to works required.
- 9) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

- 3.4 That the Planning Committee confirms that it has had special regard to the desirability of preserving the settings of (including views 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.
- 3.5 That the Planning Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the settings (including views of) of the Central Croydon Conservation Area, the Croydon Minster Conservation Area and the Chatsworth Road Conservation Area as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF.
- 3.6 That, if by within 6 months of the planning committee meeting date, the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

4. PROPOSAL AND LOCATION DETAILS

Proposal



Image 1: Proposed Site Plan

4.1 A residential development is proposed at 922, 924, 926, 928 and 930 Purley Way. The 0.45 hectare site currently has 5 detached dwelling houses and is located within the environs of Purley District Centre as identified by Policy DM42.1 of the Croydon Local Plan 2018 (CLP). The scheme would comprise

- Three apartment blocks, ranging from 6, 9 and 12 storeys and containing a total of 155 residential homes. The 12 storey block would comprise 79 homes, the 9 storey block would comprise 47 homes and the 6 storey block would include 29 units.
- The proposal would provide 40% family units onsite.
- 35% affordable housing offer (by habitable rooms), providing 14 London Affordable Rent and 30 London Shared Ownership units, which equates to 44 units

- The proposal would be a car-free development providing 6 wheelchair accessible car parking spaces only.
- The proposal includes varying public realm and amenity spaces throughout the development which have different purposes and provide break-out areas, planting 40 trees and providing additional ecology benefits.

4.2 Additional information has been provided since the planning application was originally submitted. This includes further clarification on the daylight and sunlight assessment, alterations to the proposed ingress and egress and cycle stores following discussions with TfL and details relating to the energy strategy/urban greening factor as requested by the GLA.

Site and Surroundings

4.3 The site consists five detached houses, which front towards Purley Way. As you go north of the site, past 920 Purley Way, the other properties front towards Coldharbour Lane. To the east of the site, across the Purley Way are a number of 4 storey flatted developments which front towards Pampisford Road as well as the bungalow of 25 Hereward Avenue all of which are set at a lower land level than the site. To the south of the site is the Purley Way/Pampisford Road/Russell Hill Road Junction and the district centre beyond. Then to the west is Coldharbour Lane, an old bridleway and now pedestrian/cycling route, notably to and from Thomas More School, as well as a mature row of existing street trees which site above Coldharbour Lane. On the opposite side of these mature street trees is Russell Hill Road where there is extant consent for 7/8 storey flatted development (highlighted within the planning history section) at 29 – 37 Russell Hill Road. Land levels throughout the site and its surroundings rise from south to north and then also from east to west.



Image 2: Existing Site Location Plan

- 4.4 Whilst the immediate surrounding area is primarily residential, the character of the area has evolved significantly with no set typology and form of development. Owing to the site's location in close proximity of the District Centre the wider surrounding area is very mixed in character and uses.
- 4.5 The site has a Public Transport Accessibility Level (PTAL) of 4/5 (on a scale of 0-6b, where 6b is the most accessible). The site is well served by public transport, in close proximity to Purley Railway Station, a number of bus routes and the local amenities/shops located within the District Centre. The site fronts onto Purley Way which is part of the Transport for London (TFL) Strategic Road Network.
- 4.6 The site is not in a Conservation Area and there are no heritage assets on the site, nor directly adjoining. Purley Library and Purley United Reform Church (Grade II* listed) and the Brighton Road Local Heritage Area are located within the District Centre whilst the Upper Woodcote and Webb Estate Conservation Area is within the wider area.
- 4.7 The site is within an Archaeological Priority Area (APA) Tier II location. It is also within Flood Zone 1 with there being potential for groundwater and surface flooding. The whole borough is an Air Quality Management Area (AQMA).

Planning History

- 4.8 The following planning history is relevant for this site:

20/06030/ENV - EIA screening opinion under the Town and Country Planning - Environmental Impact Assessment - regulations 2017 - as amended - regulation 6.
Environmental Impact Assessment not required.

- 4.9 The following planning is relevant within the surrounding area:

29-35 Russell Hill Road - Ref: 19/03604/FUL

This scheme was granted planning permission in February 2020 and proposed the demolition of four existing houses and the development of a scheme of 106 flats which reaches up to 8-storeys in height. **Currently under construction.**

37 Russell Hill Road - Ref: 19/00467/FUL

This scheme was granted permission in December 2019 and proposes the demolition of 1 existing house and the development of a scheme of 47 flats, up to 8-storeys in height. **Currently under construction.**

Purley Baptist Church - Ref: 16/02994/P

This scheme was recently granted permission by the Secretary of State in July 2020 having been called in by the Secretary of State initially in 2017. The scheme proposes a residential development with community floorspace, 200 homes and up to 17-storeys in height. **Pre-commencement condition applications relating to this have begun to be submitted to the LPA for consideration.**

1 – 3 Pampisford Road – Ref: 12/00291/P

This scheme was granted permission June 2012 and proposes the demolition of the existing building erection of a three storey building with accommodation in roofspace comprising of 14 two bedroom flats and provision of associated parking spaces. **Currently under construction.**

5 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 5.1 The site is considered to be in a sustainable location and suitable for a significant development. It is on the edge of a District Centre, with good public transport accessibility and in an area with a mixed character.
- 5.2 The proposal constitutes a Departure from the local plan by virtue of being a tall building in an area which is not designated for tall buildings. For the reasons above and as expanded on in the “Considerations” section, the proposal is however considered to be appropriate and there are material considerations which outweigh the development plan.
- 5.3 The development is considered to be a high quality landscape and design led scheme, subject to detailing which is proposed to be secured by planning conditions. The heights of the proposed buildings would result in some less than substantial” to the Grade II listed Purley United Reform Church. However, with regard to the relevant legislation, policies and guidance, the harm is considered to be accompanied by clear and convincing justification with the harm being outweighed by the public benefits provided in the form of new housing, affordable housing and public amenity space.
- 5.4 35% of the proposed homes (by habitable room) would be affordable housing, of which 14 would be London Affordable Rent and 30 would be intermediate London Shared Ownership.

- 5.5 The new dwellings would provide good quality accommodation. The impacts to neighbours would be limited, and the proposal would comply with the Council's policies with regard to transport, environmental impacts and sustainability, subject to the recommended planning conditions and s.106 obligations.



Image 3: CGI Image of the development viewed from the Foxley Lane/Purley Way/Pampisford Road Junction

6 CONSULTATION RESPONSES

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

- 6.2 The following were consulted regarding the application:

Mayor of London (GLA) (Statutory Consultee)

- 6.3 The GLA (referred due to the proposal being more than 30m high, including more than 150 flats) made the following comments:

- London Plan policies on housing, design, heritage, access, energy, and transport are relevant to this application. The application is broadly supported in strategic planning terms, but the following matters should be addressed to ensure full compliance with the London Plan and the Mayor's Publication London Plan.

- **Principle of development:** The proposed redevelopment of the site for 155 residential homes and the optimisation of this underutilised brownfield site is strongly supported in strategic planning terms.
- **Affordable housing:** The development proposes 35% affordable housing by habitable room split 70:30 in favour of intermediate housing. The overall quantum of affordable housing is broadly supported. In order to follow the Fast Track route, the tenure of the affordable component must provide a minimum of 30% as low-cost rent (London Affordable Rent or Social Rent), the shared ownership component must also meet the definition of genuinely affordable housing, as set out in Policy H6 of the Publication London Plan.
- **Urban design and heritage:** The general layout and massing are supported. Measures to ensure a high quality pedestrian environment to the front of the site should be secured. A fire statement should also be provided. Less than substantial harm would be caused to the Purley United Reformed Church (Grade II). Further information is required to establish if the full potential of public benefits has been realised.
- **Inclusive access:** The scheme provides appropriate levels of accessible accommodation. This is supported and should be secured by condition, along with Building Regulations standards M4(2) and M4(3) in line with London Plan Policy 7.2 and policy D3 of the Mayor's Publication London Plan.
- **Climate Change:** Further information in relation to minimising energy cost, overheating risk, demonstrating potential for a DHN in the future, the proposed site heat network and energy centre, and ASHP system are required. A circular economy statement and whole-life carbon assessment are also required.
- **Transport:** Further work is required concerning the site access arrangement to address safety concerns and to ensure it is in line with the Mayor's Vision Zero approach, facilities to assist pedestrians crossing are required, clarifications on access to cycle stores in Block A Further work is also required to ensure the protection of TfL Street Trees (Paragraphs 52-61). [Officer Comment: TfL's comments are highlighted below and since these comments from the GLA, TfL have commented further].

Transport for London (TfL) (Statutory Consultee)

6.4 In general, whilst TfL raised concerns to the scheme they have not objected to the proposal. The following points were raised:

- Insufficient evidence has been provided to demonstrate that access cannot be achieved from Russell Hill Road / Coldharbour Lane. (*Officer Comment: This application proposes an access from Purley Way and this is what is being considered. However officers are of the opinion that any proposed access from Coldharbour Lane to this site specifically would detrimentally impact pedestrian safety on a key pedestrian link and owing to the significant land levels and the risk to the existing council owned street trees, an access from Coldharbour Lane would not be feasible*).

- The service vehicle trip generation for the site highlights there will be a significant daily uplift compared to the existing situation.
- Concerns were raised in relation to the potential right turns out of the site, despite mitigation measures. The proposal could result in a potential decrease in safety on Purley Way without mitigation. TfL request that the feasibility of a potential reduction in speed limit to reduce potential risk / severity is secured. These speed reductions measures could include for example signing, 30mph road marking roundels, coloured surface and rumble devices.
- Further consideration is required to determine if facilities to assist pedestrians crossing are required, notably towards Hereward Avenue and the potential cut through towards to Pampisford and facilities such as Hospital, School, Church and Nursery. *[Officer Comment: The applicant has set out the reasons why a proposed pedestrian crossing across Purley Way to link with Hereward Avenue is not a reasonable, required or possible in this location considering the 4 lane nature of the road. Considering the nature of the road, the limited permeability of a route which is only accessible via stairs and that the likely pedestrian trips are towards the district centre and towards the existing traffic lights south of the site overall this approach is considered appropriate].*
- Further work is required to ensure that the street trees root protection areas are acceptable *[Officer Comment: The applicant has now updated this accordingly].*
- Detailed design requirements relating to sizing of disabled parking bays, routes to cycle stores and cycle parking design requirements. *[Officer Comment: The applicant has now updated these accordingly].*
- Following matters to be secured: Detailed Travel Plan, Delivery and Servicing Plan, Construction Logistics Plan, s278 Highways Agreement, restriction on apply from parking permits

Local Lead Flood Authority (LLFA) (Statutory Consultee)

- 6.5 LLFA initially objected to the scheme, pending additional drainage details relating to on-site capacity (OFFICER COMMENT: The Council's Drainage Engineer subsequently confirmed that this information can be addressed by the recommended pre-commencement condition).

Designing Out Crime Officer

- 6.6 No objection subject to Secured by Design condition (OFFICER COMMENT: A condition is recommended).

Thames Water

- 6.7 No objection. Conditions and informative recommended (OFFICER COMMENT: The recommendation includes the Thames Water condition and informative).

Historic England

- 6.8 No objection subject written scheme of archaeological investigation condition (OFFICER COMMENT: This condition is recommended).

7 LOCAL REPRESENTATION

7.1 The application has been publicised by site notices, a local press notice, and letters to neighbours. 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: 7 Objecting: 7 Supporting: 0

7.2 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:

Summary of objections	Response
<i>Principle</i>	
Cumulative impact of development.	The cumulative impact of development is considered in points 9.2 – 9.3, 9.11 – 9.38, 9.122 and generally throughout the report.
Impact upon adjoining sites development potential	The proposed development has been designed to limit, where appropriate, overlooking north towards 920 Purley Way ensuring that the adjoining site is not prejudiced for future development.
Destruction of garden space	The site is considered to be a previously developed site in a sustainable location and as seen throughout the surrounding area (along Russell Hill/Russell Hill Road including Oscar Close/Highbarrow Close), the re-development of gardens has provided sustainable development.
<i>Scale and massing</i>	
The buildings would be an overdevelopment of the site.	This is discussed in points 9.2 – 9.3 and 9.11 – 9.67
<i>Impact upon the adjoining occupiers</i>	
Tower over properties on Pampisford Road	This is discussed in points 9.81 – 9.105

Impact upon amenity of adjoining occupiers	This is discussed in points 9.81 – 9.105
<i>Future Occupiers</i>	
Proximity of the proposed development to Purley Way and Air Quality	This is discussed in points 9.113 – 9.114.
<i>Transport and Parking</i>	
Safe use of car park not possible.	This is discussed in points 9.119 – 9.134
Turn onto Russell Hill Road is already dangerous and adding another left turn will create further issues.	The proposed development would not alter the existing access onto Russell Hill Road and would alter, rather than create new accesses to and from the site.
No car policy discriminates against those that require a vehicle	This is discussed in points 9.119 – 9.134
Proposal would create extra traffic and pollution	This is discussed in points 9.113 – 9.114 and 9.119 – 9.134
Future residents will park in Hereward Avenue	Whilst Hereward Avenue is relatively close as the crow flies, it is physically separated by a four lane road which will act physical barrier with a safe route, involving crossing at the pedestrian crossings would be an approximate 400 metre walk.
<i>Other matters</i>	
Impact upon flooding – why isn't there rainfall harvesting on-site?	This is discussed in points 9.115 – 9.116.
Impact upon local infrastructure owing to rise in population	The development is liable for a Community Infrastructure Levy (CIL) payment to ensure that development contributes to meeting the need for physical and social infrastructure,

	including educational and healthcare facilities across the borough.
Cumulative impact of construction in regards to noise, dust, pollution and air quality.	The building works will be temporary, and subject to conditions to limit inconvenience to neighbours and the highway network.
Where is the bulky waste collection point? Fly-tipping will occur	There is a bulky waste store located internally within Block A. A waste management strategy is proposed to be secured via condition to ensure access for all future residents.
<i>Non-material issues</i>	
The proposal would impact upon property prices	This is not a material consideration.

7.3 Chris Philp MP has objected to the proposal and referred the application to planning committee for the reasons set out below. Whilst the case is presented to committee accordingly, it is noted however that the referral was received outside of the timeframe set in the Council's Constitution.

- The proposal for three blocks of accommodation – a 12 storey, a 9 storey and a 6 storey building - is completely out of character with the local area in terms of style, height, density, size, footprint and massing.
- The proposal to build 155 homes on a site currently hosting 5 houses constitutes over-development and completely fails to respect the character of Purley.
- 12 storeys is far too high for this site and completely out of character with the local surrounding area.
- The proposal for a 12 storey block falls into a tall building category. Croydon Local Plan only allows for one high rise building in Purley and that has been taken by the approval of 16/02994/P – Purley Baptist Church
- The three blocks of flats proposed fail to respect the transition from an urban to a suburban character.
- Poor quality amenity for occupiers of some of the proposed units in terms of accommodation and environment.
- Poor landscaping design within the scheme; inadequate children's play area and quality amenity space
- No car parking provision for residents and visitors – other than 6 Blue Badge holder spaces

7.4 Councillor Quadir has objected to the proposal and referred the application to planning committee for consideration:

- Previously, this planning proposal was for a 9 storey building which is deemed to be too high. So it is very surprising that the response has been proposed to 3

blocks of 12, 8 & 6 storeys. One tall landmark building was allowed in Purley which is Mosaic Place.

- It is an over intensive development with poor ratio of housing mix proposed. Mainly single bed homes, a few two and three bed homes.
- Loss of natural habitat and trees in the local area.
- Purley provides 50% of the new home requirement for the whole of Croydon. By doing this Purley does not have the infrastructure to deal with this. There is a lack of schools, surgeries etc to deal with the new influx of people coming to Purley causing an accumulative impact.

7.5 The Purley and Woodcote Residents Associated have objected to the scheme on the following grounds:

- Loss of a family homes and not contributing to providing family accommodation in conflict with adopted policies and guidance.
- Overdevelopment of the site with the proposed development significantly increasing the built area of the existing family home, and with this overdevelopment of the site resulting in inadequate amenity space for potential occupiers contrary to adopted policies and guidance.
- The design submitted is out of keeping with the locality and surrounding townscape, as a result of its massing, form and overall development layout and appearance, contrary to adopted policies and guidance.
- Detrimental to the amenity of occupiers of adjoining properties. Given the size and scale of this proposed development the occupiers of neighbouring properties will suffer visual intrusion, increased noise and, for those adjacent to the proposed development, loss of privacy contrary to adopted policies and guidance.
- Inadequate car parking for a development of the size and scale proposed, resulting in additional on street parking, putting parking pressure on the surrounding area, and increased traffic movements so greatly endangering road safety, especially with schools close by, contrary to adopted policies and guidance.

8 RELEVANT PLANNING POLICIES AND GUIDANCE

In determining any planning application, the Council is required to have regard to the provisions of its Development Plan and any other material considerations. Details of the relevant policies and guidance notes are attached in Appendix 2.

National Guidance

8.1 The National Planning Policy Framework 2019 (NPPF) and online Planning Practice Guidance (PPG) are material considerations which set out the Government's priorities for planning and a presumption in favour of sustainable development.

8.2 The following NPPF key issues are relevant to this case:

- Delivering a sufficient supply of homes
- Building a strong, competitive economy
- Ensuring the vitality of town centres
- 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
- Conserving and enhancing the historic environment

Development Plan

- 8.3 The Development Plan comprises the London Plan 2016 (“London Plan”), the Croydon Local Plan 2018 (“Local Plan”), and the South London Waste Plan 2012.
- 8.4 The Local Plan supports the delivery of new homes across the borough, and identifies that at least 10,760 additional homes will be delivered on allocated sites in the Croydon Opportunity Area by 2036. Whilst the emerging New London Plan is a material consideration, the weight afforded is down to the decision maker linked to the stage a plan has reached in its development. The Plan appears to be close to adoption. The Secretary of State has commented on the Mayor’s Intend to Publish version and so it would appear to be nearing adoption. Therefore, the New London Plan’s weight has increased following on from the publication of the Panel Report and the London Mayor’s publication of the Intend to Publish New London Plan. The Planning Inspectors’ Panel Report accepted the need for London to deliver 66,000 new homes per annum (significantly higher than existing adopted targets), but questioned the London Plan’s ability to deliver the level of housing predicted on “small sites” with insufficient evidence having been presented to the Examination to give confidence that the targets were realistic and/or achievable. This conclusion resulted in the Panel Report recommending a reduction in London’s and Croydon’s “small sites” target.
- 8.5 The Mayor in his Intend to Publish New London Plan has accepted the reduced Croydon’s overall 10 year net housing figures from 29,490 to 20,790 homes, with the “small sites” reduced from 15,110 to 6,470 homes. Crucially, the lower windfall housing target for Croydon (641 homes a year) is not dissimilar to but slightly larger the current adopted 2018 Croydon Local Plan target of 592 homes on windfall sites each year.
- 8.6 It is important to note, should the Secretary of State support the Intend to Publish New London Plan, that the overall housing target in the New London Plan would be 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore, even with the possible reduction in the overall New London Plan housing targets, assuming it is adopted, Croydon will be required to deliver more new homes than our current Croydon Local Plan 2018 and current London Plan (incorporating alterations 2016) targets. The relevant Development Plan policies are listed in Appendix 2
- 8.7 The relevant Development Plan policies are listed in Appendix 2.

Supplementary Planning Guidance (SPG) / Document (SPD)

- 8.8 The relevant SPGs and/or SPDs are listed in Appendix 2.

9 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of development
- Affordable housing
- Housing Mix
- Character and appearance
- Heritage
- Public Realm and Landscaping
- Housing Quality
- Impacts on neighbours
- Impacts on the surrounding environment
- Transport, parking and highways
- Sustainable design

Principle of development

- 9.2 Paragraph 11 of the NPPF 2018 applies a presumption in favour of sustainable development which means approving development proposal which accords with an up-to-date development plan without delay. Paragraph 68 acknowledges the contribution of small and medium size sites can make in meeting the housing requirements and supports the development of windfall sites.
- 9.3 Policy SP2.1 of the Croydon Local Plan (2018) (CLP 2018) sets out that the Council will apply a presumption in favour of new homes. Policy SP2.2 commits to the delivery of 10,060 homes across the borough's windfall sites by concentrating development in the places with most capacity to accommodate new homes whilst respecting local distinctiveness of the Places, protecting the physical, natural and historic environment whilst recognising that Places change.

Existing Homes

- 9.4 Policy DM1.2 of the CLP (2018) permits residential redevelopment where it would not result in the net loss of three-bedroom homes or the loss of homes smaller than 130 sqm. The existing five homes are all four bedroom plus homes with a minimum gross internal area of 201 sq m and so are not protected by this policy. 62 family homes are proposed as part of the development and therefore the proposal would be in accordance with the requirements set out by Policy DM1.2 and provides a good amount of family homes.
- 9.5 The existing buildings do not hold any special significant architectural merit and are neither locally nor statutorily listed. Therefore, there is no objection to their demolition.

Proposed Homes

- 9.6 The proposal constitutes a residential development. Being a residential area, with existing homes on site, the principle of the proposed uses is supported.

Affordable Housing

- 9.7 The Local Plan requires the Council to seek a minimum of 30% affordable housing, but negotiate to achieve up to 50% affordable housing (subject to viability), and seek a 60:40 split between affordable rented homes and intermediate homes.

- 9.8 From the outset the applicant has proposed that 35% of the development, by habitable rooms, shall be affordable homes comprising 30% London Affordable Rent (LAR) and 70% London Shared Ownership (LSO). Block C would include a mixture of LAR and LSO units – the 6 storey block with its own lifts, service facilities and entry but having been designed to mirror the other blocks, in design detail, internal quality, entrances and access to amenity spaces. Block B would be made up of a mixture of LSO and market housing and Block A would be entirely market housing.
- 9.9 As the applicants proposed offer was below 50% affordable housing set out by Policy SP2.4 of CLP 2018, their offer has been independently viability tested to ascertain the quantum of affordable homes on-site. The applicant's viability appraisal, concluded that the development would make a deficit of over £17million without providing any affordable housing units. This appraisal was subject to a third party review which agreed that the scheme would not be viable, but seriously questioned that a developer would be willing to deliver a scheme which make no profit and incurring a net loss of over £6million pounds. These independent consultants have concluded that whilst they believe the proposal would still not be viable, they believe the deficit could be reduced to £1.16 million (whilst not providing any affordable housing) and with alterations to the proposed sales values this could reduce further/remove this deficit entirely. Therefore, whilst there is some disagreement about the overall viability of the scheme, the proposed affordable housing offer is well above the amount which can be assumed to be easily provided on site and so is acceptable.
- 9.10 Whilst the split proposed being 30% (LAR)/ 70% (LSO) does not adhere with local Policy SP2, the Mayor's affordable housing SPG sets out that tenures in a Fast Track application are acceptable if they meet a ratio of 30:30:40 (affordable rent : intermediate : tenure to be agreed with local planning authority), which this scheme does. Considering this and that the scheme has been shown not to be viable to provide any affordable housing on the site, in this specific scenario this split is accepted and the proposed quantum of affordable housing is considered to weigh significantly in favour of the scheme and to be a public benefit to the overall scheme.

Housing Mix

Housing Mix

- 9.11 Policy DM1 requires appropriate housing choice for sustainable communities and within urban areas of high public transport accessibility, states that at least 40% of units should have three or more bedrooms, although some of those homes can be provided as 2 bedroom 4 person homes during the first three years of the Local Plan subject to viability. The strategic borough wide target is 30% 3-bedroom units.
- 9.12 As outlined by the table below, 40% of units would be family units when including the 2b, 4p units on site (which is all of the 2 bedroom units on-site) and therefore meeting Policy DM1 requirements.

1 bedroom	2 bedroom	3 bedroom
93	48	14
60%	31%	9%

Housing Density

- 9.13 The site falls in an urban setting under The London Plan (2016) terms and has a PTAL score of 4/5. Table 3.2 of The London Plan identifies the optimum sustainable residential quality density; this table sets the density for such setting within a range of 200-700 hr/ha. The proposal would result in a density of 872hr/ha, which officers notes exceeds density when compared with the London Matrix.
- 9.14 As Members will be aware, the London Plan indicates that it is not appropriate to apply these ranges mechanistically, as the density ranges are broad, to enable account to be taken of other factors relevant to optimising potential such as local context, design and transport capacity. The acceptability of the development in terms of scale, mass, layout and appearance is discussed below and which represents an important dimension when determining the acceptability of a particular density of development. This project has clearly emerged out of a design-led response to the site and its highly sustainable location in close proximity to local bus services, Purley train station and within the environs of the District Centre is considered appropriate.
- 9.15 In summary, the proposed residential mix and its density are acceptable. The proposal would accord with the National and Local requirements and would optimise the delivery of additional housing in the borough. The provision of housing, and affordable housing are public benefits to the scheme.

Character and Appearance

Site Layout

- 9.16 The site is laid out in the form of three distinct buildings, which would read as a 'family of buildings'. They all have consistent overarching characteristics and unique differences informed by their particular siting within the site.

9.17 Generous entrance lobbies with waiting areas have been introduced to allow a comfortable welcome and place to pause on entry and exit to each block. Furthermore each block has an additional secondary accessible entrance to allow greater permeability from other approaches, from the south for Block A and from Coldharbour Lane to the west for Block B and C.



Image 4: Entrances and access to amenity spaces

9.18 Each building has a carefully considered building footprint and is chamfered according to the specific constraints of the sites. Block A is sited on the southern corner close to the site boundary with an ‘arrowhead’ footprint which presents a slender form to the southerly approach from the gyratory and centre and positively addresses this junction. Block B is angled towards the pedestrian entrance to the site on Coldharbour Lane and Block C is angled to reduce impact and views from the neighbouring property, 920 Purley Way and provide wider views through the site to the retained greenery beyond. Between the three blocks is generous space for communal outdoor amenity, play space, public art and landscaping providing a series of “outdoor rooms” for various activities while utilising and celebrating the significant

slope across the site with further communal space located towards the rear of the site (as seen in image 4).

Image 4 - Proposed Site Layout (and block labels)



Tall Building

- 9.19 Policy SP4.5 of CLP 2018 sets out that tall buildings will be encouraged in the Croydon Opportunity Area, areas in District Centres, locations in areas well connected to public transport interchanges and where there are direct physical connections to one of the above. Policy SP4.6 is also of note and applications for tall buildings will be required to: respect and enhance local character/heritage assets, minimise environmental impacts, respond sensitively to topography, make a positive contribution to the skyline and image of Croydon and include high quality public realm in their proposal.
- 9.20 When considered in relation to this proposal, the relevant parts of Policy DM15 set outs that tall or large buildings must respect and enhance local character proposals and will be permitted where they are located in place specific areas as outlined by policies DM24 – DM49, located in a minimum Public Transport Accessibility Level (PTAL) rating of 4, of exceptional design quality and that the building height, footprint and design relates positively to any nearby heritage assets.
- 9.21 The relevant place specific policy of the CLP 2018 is DM42.1 which details that within Purley District Centre and its environs developments should complement the existing predominant building height of 3 to 8 storeys with a potential for a new landmark building of 16 storeys. It is important to note the accompanying text to Policy DM42 which states that the district centre and its environs has a varied topography which presents opportunities for tall buildings.
- 9.22 It is clear that the proposed landmark building which Policy DM42.1 relates to has been approved as part of the Mosaic Place / Purley Baptist Church scheme. However, it is important to separate the two points of “how a building complements the existing building heights” and “a landmark building”, with this proposal not considered to

create a separate landmark building which competes Purley Baptist Church and the policy allocation.

- 9.23 The site does however include a 9 and 12 storey building. Taking into account the site adjacency to the approved schemes within Russell Hill Road (as highlighted in the relevant planning history) with these flatted blocks being up to 8 storeys in height and set at a higher land level, buildings of the proposed heights are considered to be appropriate – they respond to the emerging character, whilst stepping down to the north where there is a more suburban context. There is a clear rationale for why they are set out in the manner they are on the site. A 9 storey building in this location would be considered to complement this predominant building height and fully accord with policy.
- 9.24 However, the 12 storey block is considered to be a departure from policy, when considering the place specific policy and part of the Tall Building policy. A Local Planning Authority may depart from development plan policy where material considerations indicate that the plan should not be followed, subject to any conditions prescribed in Directions by the Secretary of State. The power to depart is set out in Article 32 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. It is important that the Croydon Local Plan is read as a whole, and that failure to comply with a single policy within the plan would not necessary lead to a sustainable reason for refusal. An assessment of whether the scheme demonstrates these material considerations is made at the end of the Character, Appearance and Heritage sections.
- 9.25 In this case, the site meets many of the criteria's set out by both the strategic and detailed Tall Building policy. It is located in an area with good access to public transport (PTAL 4/5), as well as local shops and services within the District centre. As discussed in detail within the design section of this report, the proposal is considered to be of exceptional design quality and whilst the proposal is considered to cause harm to the grade II Purley United Reform Church's setting, that setting is less than substantial and is outweighed by public benefits (detailed in the heritage section of this report).
- 9.26 Overall, the acceptability of this particular tall building is determined by how well it fits into its surroundings when viewed from both near and from a distance. To establish this, a number of verified views were submitted from various important vantage



points. These views demonstrated how the height, mass and design of the scheme would contribute positively to the skyline as seen in image 5.

Image 5: Looking south towards the site and the district centre from Purley Way

Townscape and Visual Impact

- 9.27 The elongated triangular site is bounded by Purley Way, Coldharbour Lane and No.920 Purley Way. All boundaries have significant green frontages, a key feature of the site particularly at the southerly apex of the site where prominent trees play an important part in the local character with the adjacent parcel of land to the west between Coldharbour Lane and Russell Hill Road where the majority of these mature trees are located.
- 9.28 Due to the sites location at the point of two intersecting and steeply graded roads leading out of the valley where Purley district centre is situated the site has fairly complex topography (approximately resulting in 5.75 metre rise from south to north and then 3.70 metres rise from east to west) which the applicant has worked through in its design iterations and has greatly informed the final siting and design of the buildings and adjoining landscaping.
- 9.29 The proposal has been accompanied by a detailed contextual analysis which has considered the site, the surrounding area and how their proposed design concept has evolved from this analysis.

Height, Scale, Massing and Design

- 9.30 The three buildings proposed as part of the development are designed to step down in height (from 12 to 9 and then 6 storeys), south to north, responding to the site's location between urban (Purley District Centre) and its evolving suburban residential contexts with the proposed developments on Russell Hill Road to the west of the site currently under construction.
- 9.31 The variations in height are also united by a consistent and legible top, middle and base façade treatment with clearly defined details including the fluted metal panels beneath the full height glazing of the top floors of Blocks A and B are present accentuate the building crowns as seen in image 6.

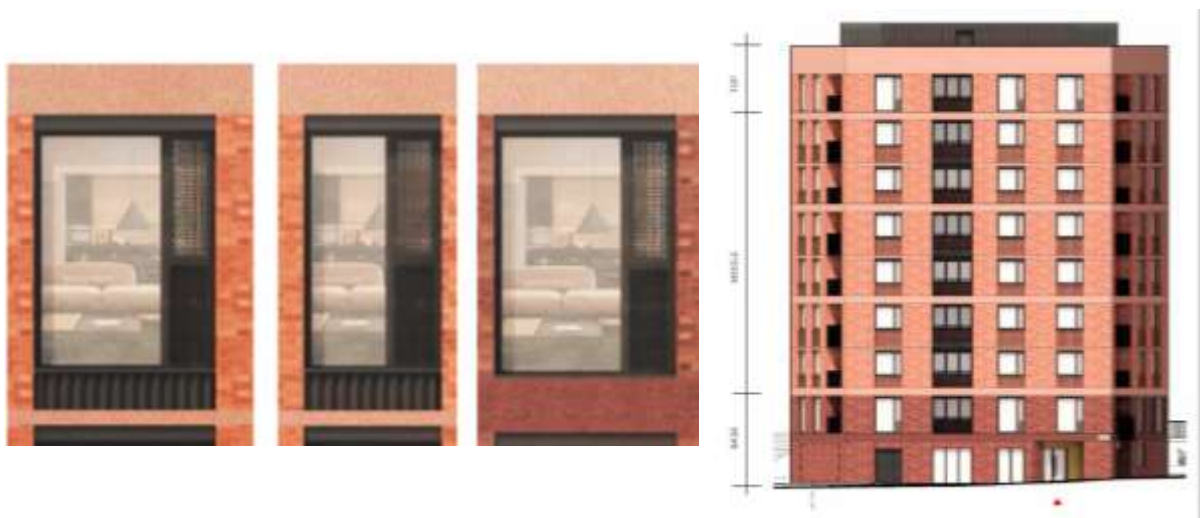


Image 6: Fluted Metal Panel details (left) and 'legible differentiation between the top, middle and bottom element of the proposed elevations' (right)

- 9.32 The proposal has a distinctive, contemporary massing with strong geometric forms that help to create a sense of openness and views between the blocks in keeping with the local character while the additional chamfers helping to maximise light in the centre of the site as seen in CGI image 7. The proposed form of the building adds interest, variations in the elevations and the additional benefit of natural surveillance throughout the site, over Purley Way and Coldhabour Lane to the rear.



Image 7: CGI Image looking south west towards the site from Purley Way.

- 9.33 The massing and layouts of the scheme responds skilfully to the complex topography of the site. This is illustrated in detail through a series of long and detailed sections and 3d views which indicate how the buildings intersect with the sloping ground at a human scale.

9.34 To reinforce differentiation between the three blocks subtle brick tone variation across the blocks, responding to brick tones found in local buildings and material palettes identified through character studies. The first two storeys are differentiated in a darker tone of brick so that they are read as plinths grounding the base of each block and breaking their homogeneity as shown in image 8.



Image 8: Purley Way Elevation detailing the proposed principle tonality across the site (top) and proposed main entrances (bottom)

9.35 Each main entrance is made legible and accentuated through generous chamfered surrounds treated with the same brick fluting. This then transitions into glazed brickwork, the colours of which are unique to each block to give a sense of individuality to each entrance as seen in image 8. The glazed finish and green colour palette was chosen to stand out and compliment the warm matte brick tones and reflect the soft landscape within and around the site. The shades of green and the warm hues of brick are also a subtle reference to the coat of arms of Coulsdon and Purley.

9.36 The proposed development reflects the surrounding Purley character through its material and façade detailing. Reconstituted stone banding and reinterpretation of local herringbone brick bond detail (found throughout the western side of Russell Hill Road including the Foxley Hatch Public House) in the form of fluted brickwork providing texture and visual richness across the facades as detailed in image 9.

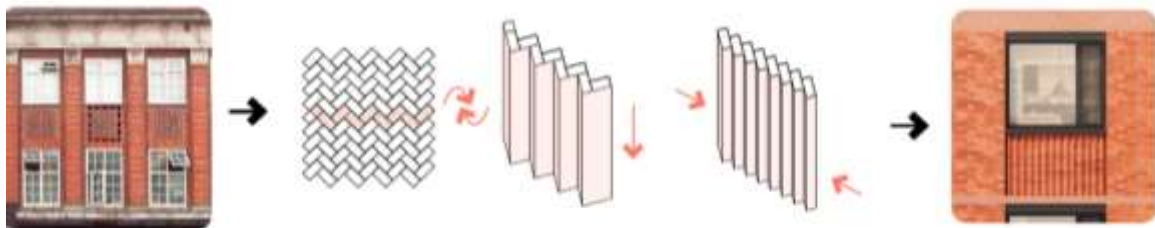


Image 9: Herringbone brick bone design development.

- 9.37 As seen in image 10, the design development has considered the use of hung tiles found in elevations throughout Russell Hill Road, and how these common features which form part of the areas character can be incorporated into this proposal in the form of added details to fenestration but also within privacy screening between the amenity spaces located at the 'arrowhead of Block A'. The proposed privacy screening would incorporate less porosity, limiting views through whilst the proposed window detailing larger in scale, allowing for improved light into the internal spaces whilst still taking into account prominent features which form the character of the area.

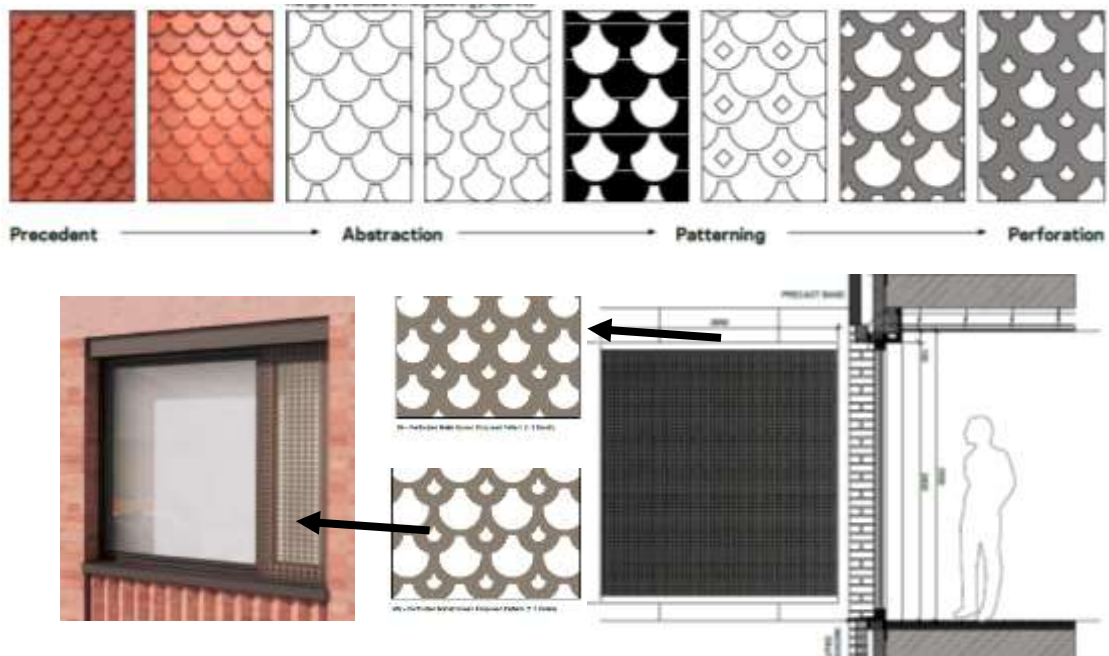


Image 10: Privacy and Window Screening Design Development

- 9.38 As set out by the local plan policy DM10, the cumulative impact of development must be considered. In this circumstance the proposal is considered to be a high quality design, which has not only considered but positively responds and reinforces the evolving nature of the local area, taking into its location within an urban location but the change to suburban characteristics which are north of the site. Overall the proposal is considered to further define and add new architectural layers to the locations sense of place.

Heritage

- 9.39 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving or enhancing the building or its setting or any features of special architectural or historic interest which it possesses. With regard to conservation areas (at section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance.

- 9.40 The NPPF places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets and their settings, and affords great weight to the asset's conservation. At paragraph 193 it states that:
- “great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm”*
- 9.41 Any harm to a designated heritage asset, including from development within its setting requires “clear and convincing justification” (paragraph 194), with less than substantial harm weighed against the public benefits delivered by the proposed development (paragraph 196).
- 9.42 Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets, and Policy DM15 permits tall buildings which relate positively to nearby heritage assets.
- 9.43 The setting of a building is defined in the glossary to the NPPF as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’. The site is not within a Conservation Area and there are no designated heritage assets either on or immediately adjacent to the site. However, due to its height, design and prominence, it would interact with the setting and views of a number of heritage assets.
- 9.44 A number of views have been assessed throughout the course of the application, including verified views, and computer modelled views. A heritage assessment has also been submitted.

Purley United Reform Church

- 9.45 Purley United Reform Church is a Grade II listed building constructed in 1904 and is located on Brighton Road, approximately 100m to the south east of the application site. The Church is a ‘Free Gothic’ style building comprising of red/orange brickwork with stone banding, tracery and details and is listed due to the architectural interest of the strong and lively architectural expression of ‘Free Gothic’ architecture, which has not been diminished through later alterations.
- 9.46 The proposed development is visible in the background between 908 Brighton Road (in the left of the image below) and the Purley United Reform Church as illustrated by image 11 with the stepped form of the blocks still allowing the Church to retain its prominence from this vantage point. Given that there are not currently any existing buildings of the scale of the development proposed present in this view, it is recognised that the proposed development would alter the setting of the church, however given that the proposals would be in the background of this building, off to its side and below the roofline of the church, the level of heritage harm caused to the setting and significance of Purley United Reform Church would be less than substantial, minor and localised, with the public benefits being delivered through the proposed development outweighing this level of harm, as discussed later in this report.



Image 11: View of Purley United Reform Church illustrating the proposed development

Purley Library

- 9.47 Purley Library is a Grade II listed building constructed in 1936 and is located at the junction of Banstead Road and Foxley Lane, approximately 140m to the south west of the application site. The building is constructed of brown facing brick with stone dressings and features large steel framed windows of a 'Crittall' style that are a key feature of the building's appearance and is listed due to both its architectural interest and local interest as a building of civic importance.
- 9.48 A portion of the upper floors of Block A of the proposed development will appear in the background just above the Sunrise retirement apartment block as illustrated by Image 12 below. Given however that this would sit off to the side of the library and would effectively form an additional layer to a pre-existing mass of built form, the impact on the library would be limited and would not constitute heritage harm as the change to the setting of the heritage asset would be within its wider setting and would be of no material impact.



Image 12: View of Purley Library illustrating the proposed development (indicated by the green wireline)

Webb Estate

- 9.49 The Webb Estate Conservation Area is a residential estate constructed between 1898 and 1925 consisting of large detached houses and defined by its 'Garden First' approach and is located approximately 410m to the west of the application site. The special interest of the Webb Estate Conservation Area includes its significance in respect of the UK's town planning and landscape history, the landscaping present across the estate, and the unique character of the estate primarily embodied through its relative secluded tranquillity. Whilst the pattern of development within the Webb Estate Conservation Area is that of large plots with extensive landscaping, the surrounding area leading to the town centre is better characterised in contrast by a denser urban grain with plots dominated by housing rather than their gardens.
- 9.50 A portion of the upper levels of both Blocks A and B would be visible in the background above 4 Furze Lane and the existing and established mature tree planting and landscaping as illustrated by image 13 below. Given however that this is an isolated view and that the proposed development would only be visible during the winter months (due to increased tree cover at other times of year), with the extent of the development visible being limited, the proposed development would not adversely impact upon the special interest of the Webb Estate Conservation Area.



Image 13: View from the junction of Furze Hill and Furze Lane illustrating the proposed development (indicated by the green wireline). Other consented developments are indicated by pink wirelines.

Brighton Road Local Heritage Area (LHA)

- 9.51 The site lies adjacent to the Brighton Road LHA which is primarily made up of the Brighton Road and Russell Hill Road shopping parade. The site is visible primarily from Russell Hill Road (in addition to the view from Brighton Road beyond the Purley United Reform Church previously discussed). Whilst the proposed building will be visible from within the LHA, overall its role would be minimal and where visible would contribute positively to the wider townscape of these non-designated heritage assets which have taken design cues from the positive buildings located within the local area.

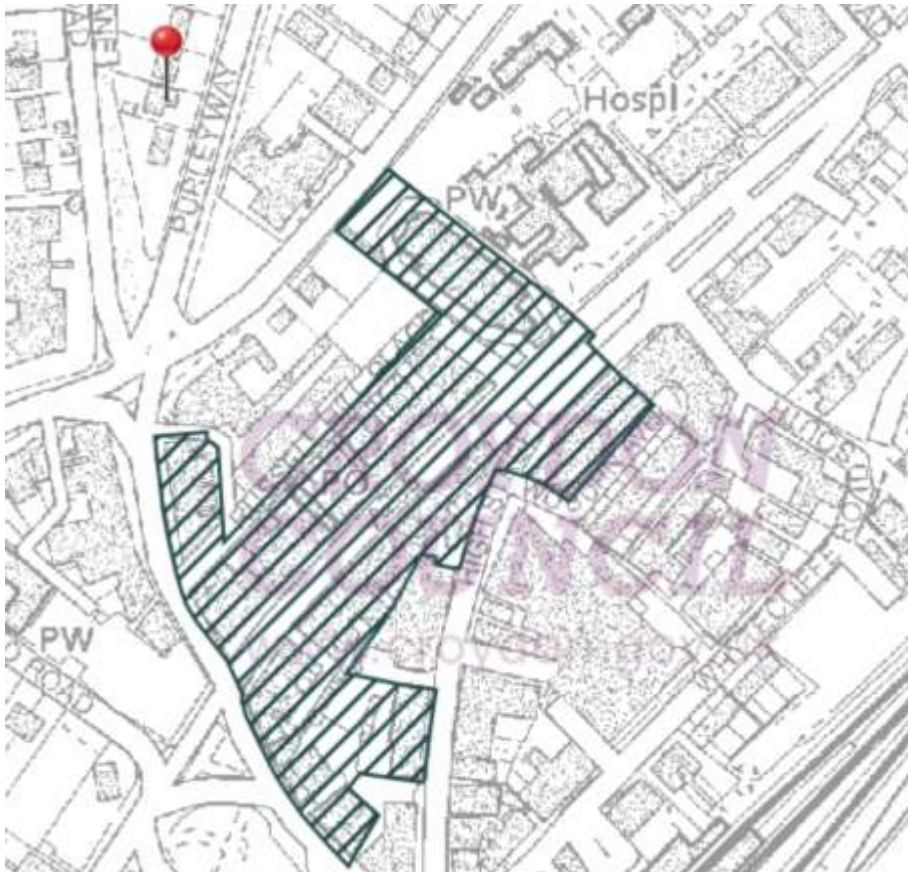


Image 14: Brighton Road Local Heritage Area.

Harm and Public Benefits

- 9.52 No direct harm to the fabric of any heritage assets would occur as a result of the proposal, however it would cause less than substantial harm to the settings of the Purley United Reform Church as set out above.
- 9.53 A much smaller development (or no development) may avoid harm to heritage assets, but that would not deliver the scheme's benefits in terms of housing, and specifically, affordable housing. Officers are of the view that the benefits of the proposal could not be achieved, without that level of harm. Those benefits, accompanied by the minimisation of the accompanying harm, offer clear and convincing justification for the harm to heritage assets identified above.
- 9.54 Having concluded that the scheme gives rise to "less than substantial harm", and that there is clear and convincing justification for that harm, it is necessary to weigh that harm against the public benefits. The public benefits weighed against the scheme are as follows:
- the delivery of a significant quantum of housing contributing positively to the borough's housing stock;
 - and a significant proportion of affordable housing, including 14 at London Affordable Rent and 30 at London Shared Ownership; and the delivery of a new publicly accessible pocket park within the sites frontage.

- 9.55 Officers are of the view that those public benefits would outweigh the harm caused to the various heritage assets.
- 9.56 As the site lies within the London to Brighton tier II Archaeological Priority Area and adjacent to tier I area, an Archaeological Assessment was undertaken and submitted as part of the application. The findings of the assessment revealed that there is a moderate potential for Roman and/or Saxon period archaeology. To safeguard any archaeology, a planning condition is recommended requiring a written scheme of investigation to safeguard the archaeological interest.
- 9.57 Subject to the recommended conditions, the proposed buildings would result in a high-quality design which contributes positively to the skyline and surrounding townscape, provides a set of high quality environments, reflects the materiality and richness of detailing within its local context, and successfully balance intensification with high quality active frontages and pedestrian design features. The development would therefore result in a high quality environment which contribute positively to the character and appearance of its setting.

Public Realm and Landscaping including trees

- 9.58 The landscape approach successfully nestles the development into its surrounding context taking advantage of the significant slope on site and providing a series of spaces for various scales of outdoor activities including, a slide and formal play area (as seen in image 15).



Image 15: Main playspace amenity between Block A and B (site layout left and section right)

9.59 A rockclimbing wall, a range of intimate small-scale outdoor areas with seating, and larger lawned areas located between Blocks B and C as well as to the rear of the site. There is also a publicly accessible play space between Block B & C which would be accessed from Purley Way and shown in image 16. This innovative use of the topography embedding the playspaces and communal areas within the topography is considered to provide high quality soft landscape which adds character and definition to the development but allows it to play a role within the wider area.

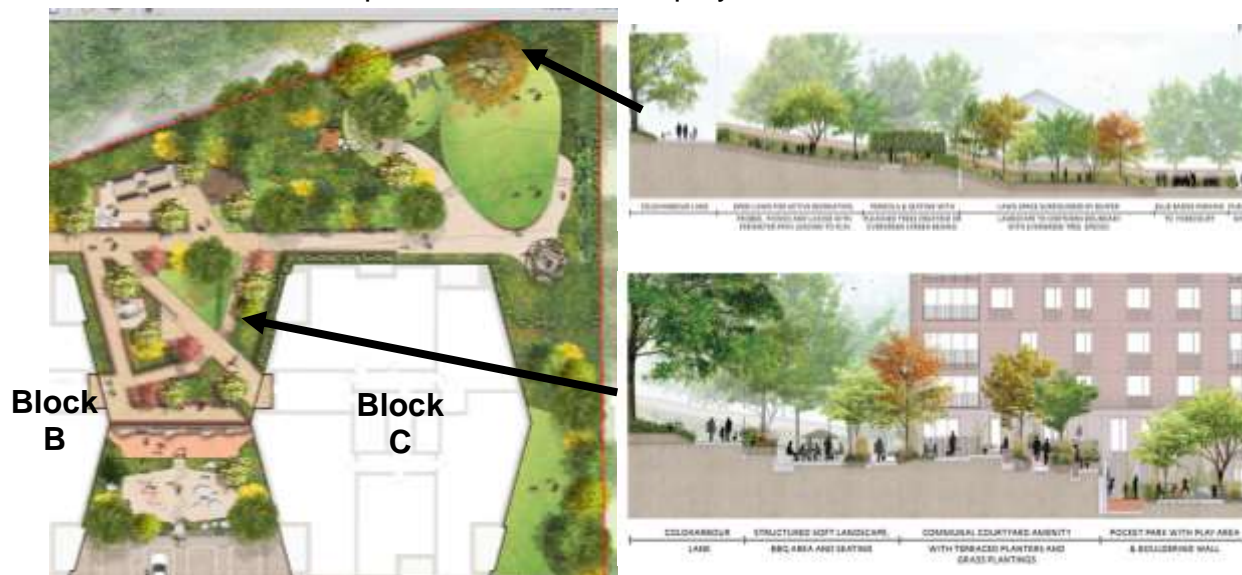


Image 16: Proposed landscape masterplan between and to the rear of Blocks B and C (left) and section details between Block B and C (top right) and Block C and 920 Purley Way (bottom right)

9.60 The landscape designs successfully maintains and enhances the mature planted character of the site and its boundaries including an improved corner treatment with landscaping and seating adjacent to the existing bus stop on Purley Way. Detailed conditions will ensure the landscape has adequate impact on day one and the ability to mature comfortably over time. As part of the surface water strategies nature based SUDs in the form of rain gardens have been designed into the landscape at its easterly and southerly extents at the lowest levels of the sloping topography.

9.61 There are currently 32 trees or groups of trees/hedges on-site, with 29 street trees located west of the site within Coldharbour Lane. None of these are subject to a TPO. The street trees will be protected throughout the construction process with none of them being removed. 10 trees, 3 groups of trees and 3 hedges (totalling 24 in quantity) are proposed to be removed as part of the development (none of which are formally protected), with one of those trees noted to be a B grade trees. This B grade tree is located in the rear garden of 926 Purley Way, and has little visual amenity value and therefore is not considered to be worthy of protection. The proposal includes the planting of 40 trees located throughout the site, with larger, pollutant resistant species proposed at the front facing onto Purley Way with a wide range of species in principle proposed within the other amenity spaces. Taking into account this significant replanting and proposed development of the wider landscaping masterplan overall the proposal is considered to provide a high quality environment for future occupiers as well as the wider character of the area.

9.62 The proposed boundary treatment along Coldharbour Lane will have a number of setbacks from the boundary to enhance the green fringed character of the lane. The

inset fence will be further developed through the public art condition. It will incorporate a bespoke design, forms and range of materials to create relief and visual interest along the boundary.

Public Art

- 9.63 Local Plan Policy DM14 requires the inclusion of public art, which is to be secured by a planning condition. Although no specific form of public art has been proposed, the applicant has committed to the provision of design elements within both the public realm and the building itself that will contribute to the aesthetic quality of the locality. The use of elements such as unique paving design, areas located at the northern elevation of Block B and southern elevation of Block C as well as decorative boundary treatments have been identified as ways to achieve this. The condition will include review of the public art strategy, brief and final designs and include physical samples and proofs of concept where appropriate.

Designing Out Crime

- 9.64 The proposal was considered by the Metropolitan Police Service's Designing Out Crime Officer who advised that the site should be well thought out to minimise the risk of criminal activity. They identified potential concerns which will require additional detail to be provided (relating to cycle and refuse stores as well as landscaping across the site) which they suggest should be addressed through planning conditions. In order to ensure a safe, inclusive and accessible development where crime and disorder, and the fear of crime, do not undermine the quality of life, Secured by Design accreditation is recommended to be secured by a planning condition, alongside security measures across the site.

Conclusions on Tall Buildings, Heritage and Departure

- 9.65 The scheme constitutes a Tall Building, is a Departure from the local plan and creates some harm to heritage. As set out in the above report, these issues require careful consideration as to whether the proposal is acceptable. Taking the heritage implications, the harm caused is less than substantial and is limited to the Purley United Reformed Church's setting. It is outweighed by the public benefits set out at paragraph 9.54. The scheme is not in an area identified for tall buildings, but all the other criteria set out in policy DM15 are met (such as the high PTAL of the site, quality of the scheme etc). Therefore, whilst not being in an area identified for tall buildings, a tall building is acceptable as policy DM15 is met apart from DM15a.
- 9.66 Turning finally to the issue of a Departure, the policy departed from is the requirement in DM15 for tall buildings to be located in areas identified (policy DM15a) and the Purley place specific policy for buildings to be up to 8 storeys in height complementing the character of the area. A Departure must be justified by material considerations that outweigh the departure. Officers consider that there are material considerations outweigh the departure as follows:
- The scheme's contribution to sustainable development through its use of a well located accessible site,

- The high quality of design and landscaping proposed throughout the site and its benefits through the provision of publically accessible pocket park area (climbing wall)
- The good provision of residential units and affordable housing units

9.67 Therefore, officers are satisfied that a Departure is justified in accordance with the requirements of the Development Management Procedure Order.

Quality of Accommodation

9.68 Policy SP2.8 of the Croydon Local Plan 2018 indicates that housing should cater for residents' changing needs over their lifetime and contribute to creating sustainable communities. Individual units should meet the standards set out in the London Housing SPG and Nationally Described Space Standards.

9.69 The proposed building would have legible and well-designed entrances, with overlooked and attractive frontages. Internally, the communal spaces would have sensible layouts, generous entrances, and spaces for internal letterboxes. No flat would be more than twelve metres from the nearest lift. All of the blocks would have a maximum of seven units per floor allowing the opportunity for future residents to know their closest neighbours. There would be easy access for residents to bin stores, cycle storage and all communal amenity areas.

9.70 All units would comply with the Nationally Described Space Standards, with sensible layouts, storage space and well-proportioned rooms. Many would be dual aspect. There would be some single aspect units, which would mostly be one-bedroom flats, and all of which would be no deeper than they are wide thereby allowing good access to natural light. No north facing single aspect units are proposed.

9.71 A daylighting assessment was undertaken demonstrating that all of the tested rooms met or exceeded the BRE guidelines for average daylight factor (ADF). In terms of sunlight, all assessed rooms will receive levels of sunlight (APSH and WPSH) that satisfy recommended targets throughout the year including during winter. The daylight and sunlight levels afforded to future occupiers of the development would be acceptable.

9.72 The site fronts onto Purley Way and this is an obvious source of noise pollution. To ensure that a reasonable level of amenity for future residents is obtained throughout the year, the noise mitigation measures (double glazing and ventilation systems) will be secured by way of condition.

9.73 The proposed units would also experience good levels of privacy, with all windows being at least 12m from the directly opposite windows. Due to the orientation, chamfered elevations and layout all units would benefit from acceptable levels of privacy and outlook for an urban location.

Accessible Housing

9.74 Level access is proposed to all buildings from Purley Way, with all blocks including dual lifts to ensure step free access to all homes. Blocks B and C have internal step free access to both front and rear amenity spaces. Block A, would have secure fob

access for residents with step free requirements to travel through Block B to the rear amenity areas. This approach is considered acceptable and is proposed to be secured via condition.

- 9.75 16 (or 10.3%) of the proposed units are designed to be accessible 'wheelchair user' dwellings, which satisfies the Local Plan requirement for new homes to comply with Building Regulation Part M4(3) (Wheelchair User Dwellings). The remaining 89.7% of units would be accessible and adaptable M4(2) dwellings. Planning conditions are recommended to secure compliance with Parts M4(2) and M4(3) of the Building Regulations. The site offers level access routes to wheelchair accessible public transport (including buses, trams and trains) and therefore wheelchair users would not be wholly car dependent. Six accessible parking spaces are proposed within the sites frontage and which will be allocated to future occupiers who are blue badge permit holders.

Outdoor Amenity Space and Playspace

- 9.76 All units are required to have access to private and communal amenity space which meets the requirements of the London Housing SPG in terms of size.
- 9.77 All units have direct access to private balconies ranging from 5 to 9sqm and the building also include significant amenity spaces (as detailed within the public realm and landscaping section). The main communal spaces provide a combined area of 980sq m of communal amenity spaces (including child play spaces). These areas allow opportunity for residents to access to areas of open space with direct sunlight throughout the day.
- 9.78 In terms of play space, the child yield calculator expects 37 children to reside in the development, with the development required to provide 256.2 sqm of play space and 30 sqm of doorstep play. The proposal includes 414.7sqm of play space and doorstep play, across the site in a number of communal areas and this combined with the shared landscape amenity areas and the private amenity spaces (balconies) would meet with the minimum benchmarks for the play space requirements for 0-17 year olds on-site.
- 9.79 An overshadowing assessment was carried out for all outdoor communal amenity spaces located between and to the rear of the buildings. All tested areas meet the BRE's Sun Hours on Ground test, which requires that more than 50% of each area receives at least two hours of direct sunlight on 21st March.

Housing Quality Summary

- 9.80 Overall, the proposed development would provide well-designed homes which would offer a sense of arrival and place of retreat, in line with the aspirations of the London Housing SPG. The homes themselves would offer residents a combination of good outlook, privacy, sunlight and daylight, internal spaces and private amenity spaces. There would also be well-designed communal landscaped gardens and playspace. Overall, the proposal would all offer an acceptable standard of accommodation.

Impacts on Neighbours

Privacy, Outlook, Noise and Disturbance

- 9.81 The site is surrounded by a number of neighbours (as shown in image 17) that could be affected by the development during demolition, construction or on completion. Care should be taken to ensure that there isn't a loss of amenity for current or future occupiers that may arise from noise and disturbance, impacts on privacy and outlook. Rigorous construction environmental management plans would be required to detail a range of mitigating measures to reduce these impacts insofar as possible.
- 9.82 The separation distances between the highlighted plots and the application site are compliant with the minimum distances set out in the in the Suburban Design Guide SPD, although directly linked to an application of this scale these standards these continue to be useful guidelines for all developments to follow and each relevant site is discussed in more detail below.

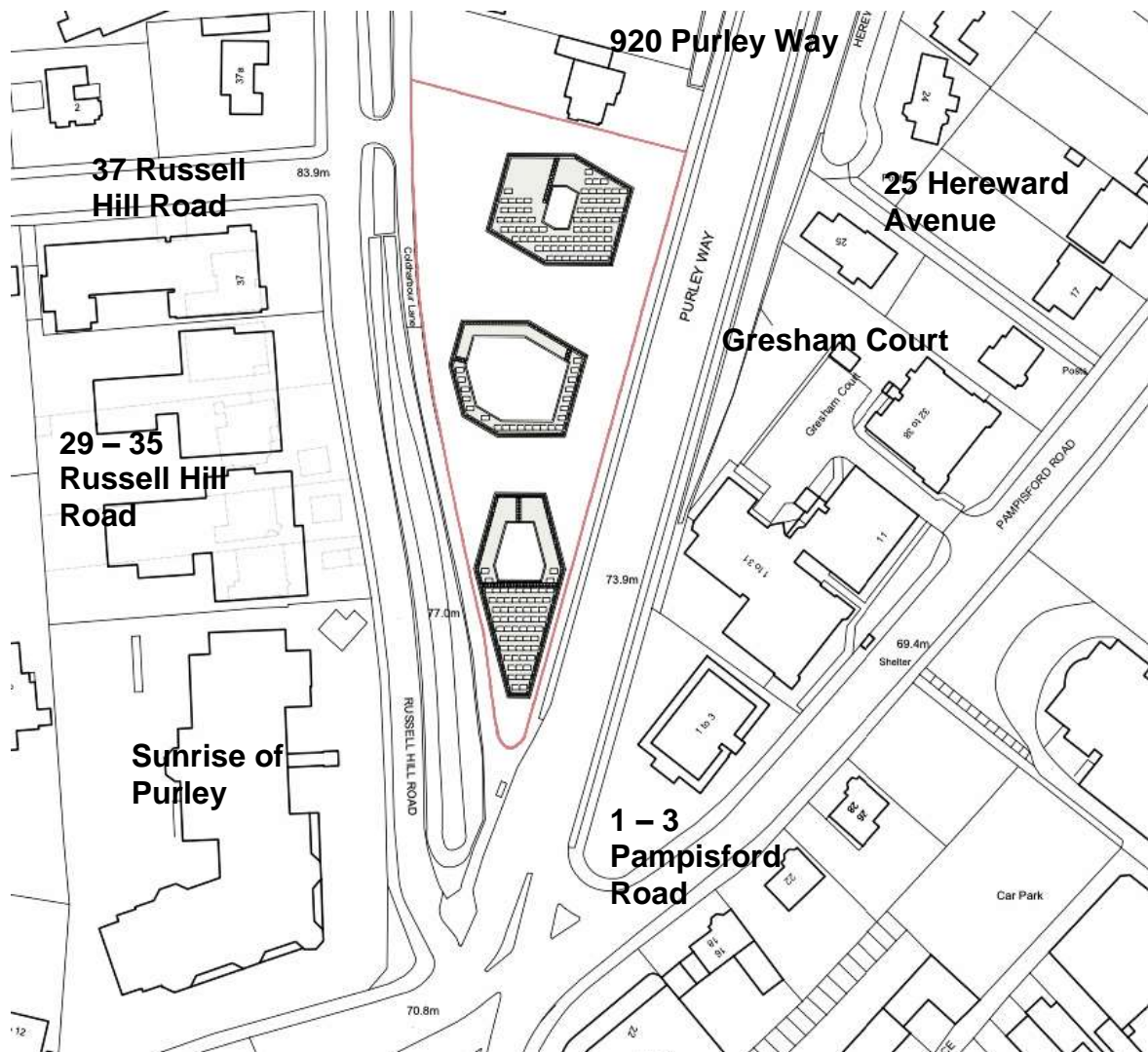


Image 17: Proposed Site Plan with adjoining occupiers highlighted.

Sunrise of Purley

- 9.83 Sunrise of Purley is a care home for the elderly and is located to the south west of the application site and is approximately 40m away from the proposed building. Given the generous separation distances it is unlikely that there would be any material impact on overlooking from the proposed development to this neighbouring site. The angled façade would only allow oblique views into the site and is therefore considered to be acceptable with notably the private amenity space to the rear of this care home being unaffected.

29 – 35 Russell Hill Road

- 9.84 As detailed within the planning history section the site has gained planning permission for 106 flats to replace the four single family dwelling houses. As above there is approximately 40m separation from the development site. It is important to note that although there would be windows facing each other, the separation distances negate any harm to future occupiers of both development sites.

37 Russell Hill Road

- 9.85 Alongside 29 – 35 Russell Hill Road, 37 Russell Hill Road has gained planning permission for the construction 2-8 storey flatted development, comprising 47 units. The consented scheme would be approximately 50m away from the smaller of the blocks within the development site. Given the site conditions and separation distance it is again unlikely that there would be any adverse impact on amenity for future occupiers.

920 Purley Way

920 Purley Way lies directly to the north of the site and has the closest proximity/relationship with the smallest Block (C). Block C has been designed with neighbour amenity in mind and so alongside the design intent of the scheme, the chamfered built form steps away from this adjoining occupier. Windows have been inset and angled with the larger of the two panels to be obscurely glazed on the north western elevation. This would prevent undue overlooking into the adjoining occupiers rear garden for the first 10m and habitable spaces as seen in image 18.

- 9.86 The north eastern elevation would have views onto the public facing elevation of No. 920 Coldharbour Lane. Although it is acknowledged that there will be views onto the front of the property it is not considered to cause undue harm to privacy and overlooking given the existing condition is the same with views from Purley Way. Officers are satisfied that the design interventions that have taken place are satisfactory to preserve the amenity of these adjoining occupiers and not prejudice the adjoining site from future development.



Image 18 – Site Layout planning detailing Block C and 920 Purley Way (top left), close up of inset windows (top right) and CGI visualisation of this approach (bottom)

25 Hereward Avenue

- 9.87 25 Hereward Avenue lies to the north east of the site separated by Purely Way. The Block C would be approximately 35m away from this neighbouring property, further separated by a dense embankment of trees. It is recognised that as the proposed site sits at a higher level to the neighbouring sites to the east, careful consideration of neighbour amenity is undertaken. However, given the site condition and separation distances it is unlikely that there would be any material impact on amenity to this neighbour.

Gresham Court

- 9.88 Gresham Court refers to, two linked three storey, residential blocks and a smaller, two storey residential block that have their principal elevations on to Pampisford Road. There would be approximately 25m separation distance from the nearest corner point of Gresham Court and the proposed development. This site would interact with the tallest building (Block A) that has been proposed. However much of the rear elevation on Gresham Court is obstructed by a retaining wall and so the closest, visible window on the rear elevation would be approximately 37m away. Given the chamfered edge condition of the building, separation over Purley Way and the dense, embankment, tree coverage, officers are satisfied that an acceptable level of neighbour amenity will remain in terms of overlooking, privacy, noise and disturbance.

1 – 3 Pampisford Road

- 9.89 This neighbouring site is approximately 37m away from the closest edge of the proposed development. It is recognised that as the proposed site sits at a higher level to this neighbouring property and that Block A is the tallest element of the proposed development. Whilst it is acknowledged that the new development will inevitably impact upon this adjoining site, overall, this is an urban location with 1 – 3 Pampisford Road being surrounded by existing public vantage points from Purley Way and Pampisford Road. Therefore, the proposal is not considered to detrimentally impact the amenities of these adjoining/future occupiers to an unacceptable degree.
- 9.90 Overall, the individual design of the proposed building has been designed to reduce impacts to neighbouring properties. Taking this and the separation distances into account it is considered that the development would have minimal impact on neighbour amenity for existing and future occupiers

Daylight and Sunlight Impacts

- 9.91 An amended sunlight and daylight assessment was submitted with the application, to take into account the approved developments within Russell Hill Road. It considers the impacts of the proposed development on the adjacent residential neighbours in accordance with the 2011 Building Research Establishment (BRE) guidelines. The neighbouring residential properties facing the site were tested for daylight impacts. Those residential windows which were also within 90 degrees of south (i.e. those receiving sunlight) were also tested for sunlight impacts. See Appendix 3 for BRE Guidance terms.

Applying the BRE Guidance

9.92 As shown in image 13, the daylight and sunlight assessment identify the 8 neighbouring properties tested for sunlight and daylight and which are discussed individually below:



	Neighbouring Building	Use	Assumed sensitivity
1	Sunrise of Purley	Residential: Assisted living complex	High
2	29 – 35 Russell Hill Road	Residential: one 5 -7 storey apartment block, and one 6 -7 apartment block*	High
3	37 Russell Hill Road	Residential: 2-8 storey apartment block**	High
4	1 Coldharbour Lane	Residential: 2-storey house	High
5	920 Purley Way	Residential: 2-storey house	High
6	25 Hereward Avenue	Residential: 1-storey house	High
7	Gresham Court	Residential: Retirement home complex	High
8	1 – 3 Pampisford Road	Residential: 3-storey apartment block***	High

* Consented development (ref. 19/03604/FUL); assumed complete within models

** Consented development (ref. 19/00467/FUL); assumed complete within models

*** Consented development (ref. 12/00291/P), currently under construction; assumed complete within models.

Image 13: Diagram showing locations of neighbouring properties (top) and table of these properties (bottom)

Sunrise of Purley

- 9.93 8 windows, located within the northern element of the building located in the eastern elevation with 7 of those windows meeting the meet BRE baseline guidance for VSC, in regards to daylight. Noticeably one window will fall below to 0.73 of its former value and 26.1% maintains an acceptable level of daylight marginally below however, considering this is relatively minor reduction overall the proposal is not considered to be significantly detrimental to this adjoining occupier.

29 – 35 Russell Hill Road

- 9.94 26 windows were tested in regards to VSC, with 6 of those windows meeting the BRE guidance for daylight. The other 20 windows, are located in 17 rooms within this proposed development and therefore were tested for average daylight factor (ADF) considering the internal room arrangements were known. All of these rooms would meet the ADF for their specific use (kitchen, living room, bedroom etc) and therefore the proposal is not considered to detrimentally impact the future occupiers of this development.

37 Russell Hill Road

- 9.95 6 windows were tested in regard to daylight with all windows meeting the BRE's guidance. The proposal is not considered to impact the future occupiers daylight.

1 Coldharbour Lane

- 9.96 Considering the orientation of this adjoining occupier (fronting towards Coldharbour Lane rather than Purley Way) 3 of their rear windows have been assessed for daylight and sunlight impact. All 3 windows would continue to meet the BRE guidance and therefore there is not considered to be detrimental impact in the way of daylight or sunlight for this adjoining occupier.

920 Purley Way

- 9.97 With this adjoining occupier to the north of the site and abutting the northern boundary, 10 windows have been tested for daylight impact. All ten continue to achieve a VSC of greater than 27% or 0.8 times its former value.
- 9.98 The garden space of this adjoining occupier have also been tested for overshadowing impact but would remain unchanged with 100% of the garden space achieving 2 hours of sunlight on 21st March. The proposal is therefore considered to be acceptable and in accordance with the guideline set by the BRE.

25 Hereward Avenue

- 9.99 Across Purley Way, 5 windows within this single storey bungalow were tested and would maintain a VSC valuer greater than 27% for daylight levels. Owing to the orientation of this bungalow, 1 window has been tested in regard to sunlight impact with that window continuing to achieve the BRE's criteria. The proposal is therefore not considered to detrimentally impact daylight and sunlight levels of this adjoining occupier.

Gresham Court

- 9.100 East of the site is Gresham Court, a flatted development where 56 windows have been tested for VSC. 37 of those windows meets the BRE's guidance with 19 windows having a VSC value less than 0.8 its former value. Considering the sites age, floorplans have been sort for some of the units. 9 windows of the 19 windows which fall below 0.7 times their former value area and are located in 6 rooms. These rooms have therefore been considered in regard to the ADF and would continue to meet the ADF levels point post development. Therefore, whilst there would remain a minor impact upon 10 windows which fall between 0.7 and 0.8 times their former value overall considering the sites urban location, the proposals impact upon daylight is acceptable.
- 9.101 Due to the T shaped nature of this building 24 windows have been tested for sunlight impact with all windows achieving the BRE's guidance for annual and winter sunlight hours.
- 9.102 An overshadowing study has reviewed the proposed sunlight for the communal amenity space within this development. 83% (down from 87%) of the space would continue to meet the 2 hours of sunlight on 21st March, as specified by the BRE's guidance and is therefore considered acceptable.

1 – 3 Pampisford Road

- 9.103 8 windows within this flatted development, currently under construction have been tested for daylight impact. Whilst only 1 of the 8 windows would meet VSC guidelines, again as the floorplans are available, the 6 rooms to which these 8 windows have been tested for ADF and they continue to meet the guideline for average daylight factor post development.
- 9.104 The communal amenity space located in the north west of the site has been tested for an overshadowing impact and there would be no change from the existing situation for this space. The proposal is therefore considered to be acceptable.

Daylight and sunlight conclusions

- 9.105 Whilst the proposed development would result in some daylight and sunlight impacts for the surrounding properties, in the vast majority of instances where impacts beyond BRE guidelines occur, these are only minor in nature and where these impacts occur, good levels of daylight and sunlight are generally still maintained, especially considering the urban location of the affected properties. As such the daylight and sunlight implications of the proposed development for surrounding properties are acceptable.

Impact on the Surrounding Environment

Microclimate

- 9.106 The wind conditions around the scheme were assessed through wind assessment which considered the existing conditions surrounding the site and the affect the development may cause. The proposed assessment details that the wind conditions

surrounding the site for both pedestrians and cyclists would be unchanged by the development.

- 9.107 Notably there is potential for an impact within the development itself and notably in locations between the blocks including the children's playspace between Block A and B during the winter months as well as the private balconies of residents within Blocks A and B.
- 9.108 The report sets out proposed mitigation methods in the form of appropriate landscaping should mitigate the microclimate within these spaces to an acceptable standard.
- 9.109 The report suggests that the balcony spaces which are noted to be potentially impacted by wind (notably those that are either within the northern and/or western elevation) should have balustrading which has 30% porosity. The agent has stated that owing to concerns relating to what impact this would have on the overall design approach as well as the impact being largely restricted to winter months, when balcony spaces are not as likely to be used this mitigation has not be introduced.
- 9.110 Whilst the LPA acknowledge this point, future occupiers should be able to use their balconies accordingly throughout the year and with a continuation of the design intent considered for the proposed privacy screening, believe that a design led solution to this can be included.
- 9.111 In conclusion, as no wind tunneling exercises have been undertaken and considering the changing environment to ensure that the appropriate landscaping and design mitigations are included within the relevant conditions, a wind tunneling condition is proposed accordingly so these can be detailed appropriately.

Contamination

- 9.112 The site historically has been residential in nature, however considering the scale of the development a full site investigation should be undertaken, assessed and approved by the LPA prior to the commencement of work on-site. This is proposed to be secured via conditions accordingly.

Air Quality

- 9.113 The site is in an Air Quality Management Area (AQMA). The submitted air quality assessment demonstrates that there would be no exceedances of either short term objectives for NO₂ or particulate matter and that the development would be neutral in terms of construction and transport impacts.
- 9.114 The air quality assessment found that there is no requirement for mitigation measures such as mechanical ventilation. Notwithstanding this, in addition to openable windows and balcony doors, units can be ventilated via a ducted ventilation system. A contribution of £15,500 towards air quality improvements to mitigate against non-road transport emissions will be secured via the S.106 agreement, and a condition is recommended to ensure that the construction impacts on air pollution are mitigated.

Flood Risk and Sustainable Drainage

- 9.115 The application site is located within Flood Zone 1, which has a low probability of flooding from a tidal event. The submitted Flood Risk Statement concluded that the

site has a low risk of flooding from all sources. Initial concerns were raised by LLFA regarding details on proposed mitigation measures particularly with regard to details of surface water drainage/run-off attenuation rates. To overcome concerns raised, additional details were raised and LLFA now recommends the proposed to be delivered in accordance with those set out with the amended FRA submitted. Thames Water have also requested conditions (which is proposed to be added) concerning any potential piling on site owing to the location of main pipe within 5 metres of the site and to ensure that this is protected during any construction works.

- 9.116 The site is in a prominent position and owing to the known flooding history in the wider area, the development has included SuDS proposed include rainwater harvesting, green roofs and permeable paving. The site would also be capable of storing water volume for a 1/100 year rain event plus a climate change storm events. The proposed measures are expected to have a positive impact to flood risk in the area and accord with the NPPF and Policy 5.12 of the London Plan. Subject to the recommended condition, the proposal would be acceptable in terms of drainage and flood risk.

Construction Impacts

- 9.117 A Construction Environmental Management Plan is to be secured by a condition, to ensure adequate control of noise, dust and pollution from construction and demolition activities, and to minimise highway impacts during the construction phase.

Light Pollution

- 9.118 To avoid excessive light pollution, a condition is recommended requiring details of external lighting, including details of how it would minimise light pollution.

Transport, Parking and Highways

- 9.119 The site has a Public Transport Accessibility Level (PTAL) of 4/5 (on a scale of 0-6b, where 6b is the most accessible). The site is well served by public transport, in close proximity to Purley Railway Station, a number of bus routes and the local amenities/shops located within the District Centre. The site fronts onto Purley Way which is part of the Transport for London (TFL) Strategic Road Network.

Parking

- 9.120 Policy DM30 of the CLP 2018 requires that the impacts of car parking are reduced within areas of good public transport accessibility (PTAL 4+). The only on-site parking spaces proposed are 6 wheelchair accessible spaces located at the front of the site. The blue badge provision exceeds the 3% requirement as outlined within both the adopted and draft London Plans.
- 9.121 A contribution shall be sought and secured via s.106 agreement to fund off-site car clubs space and membership for future residents within the wider area.
- 9.122 Whilst the site is not located within a Controlled Parking Zone, it is in close proximity to the Purley Permit zone, and therefore to ensure the proposed development would not increase pressure on parking availability in the wider area, residents' eligibility for parking permits would be restricted by the s.106 agreement. Residents have raised concerns that future occupiers could decide to park within Hereward Avenue, directly east of the site across Purley Way. Whilst parking is currently unrestricted in Hereward Avenue, it is located approximately 140 metres away across the 4-lane

carriageway and only accessible directly via a set of stairs. Taking into account these specific scenarios which would act as a barrier overall there is considered to be a negligible impact upon parking availability within Hereward Avenue. As with other permitted sites within Russell Hill Road, residents from these developments are restricted from applying for parking permits and therefore there is not considered to be any cumulative impact created in the way of parking availability within the wider area.

- 9.123 In line with Policy DM30 20% of the proposed vehicle spaces shall have active charging points for electric vehicles with the other 80% being constructed within passive charging points should additional electric charging infrastructure be required.
- 9.124 This overall approach to parking, subject to the recommended conditions and s.106 obligations is considered acceptable.

Access, Deliveries and Servicing

- 9.125 The existing site is made up of 5 houses, all of which front towards Purley Way and where their vehicular accesses are taken. This proposal would utilise two of the existing accesses as an ingress and egress for the new development. TfL initially raised concerns regarding the lack of information provided by the applicant about the potential delivery and servicing needs for the site and how this may impact upon the amount of rights turns into the site and onto Purley Way itself.
- 9.126 Following discussion between the applicant and TfL, an agreement has been reached in regards to the number of vehicular trips to and from the site. It was agreed that 70 one-way service trips and 4 car trips per day could occur. At peak time this could result in 10 trips (made up of 9 service trip and 1 car trip). Following these discussions TfL asked the applicant to justify why vehicular access was not taken from the west of the site off Russell Hill Road/Coldharbour Lane and subsequently the LPA their opinion on this point. Firstly, it is important to state that this application does not propose an access off Coldharbour Lane, it proposes it off Purley Way and that is the point under consideration as part of this application. Secondly, whilst it is not a consideration for this application, the LPA have informed TfL that taking access from Coldharbour Lane due to the topography and access arrangements required for this site, it would likely have a direct negative impact upon the existing mature street trees as well as in this location a negative impact upon key pedestrian and cycling route to and from Purley District Centre. Therefore, the LPA would not encourage a vehicular access in this location.
- 9.127 TfL have continued to maintain their concern over the potential uplift in service trips to the sites, following the agreement of service trips which would lead to the potential for right turns to and from the site and potentially decreasing safety on Purley Way. TfL acknowledge that the applicant has proposed measures to discourage rights turn movements (including additional signage and proposed alterations to the kerbs which direct vehicle traffic to turn left into and out of the site) however, owing to the potential de-tour requirements needed these could potentially be ignored.
- 9.128 However, TfL have not objected to the scheme taking into account the developments use of existing accesses, the LPA's positions on other accesses and that no proportionate or viable engineering solutions to prevent vehicles from turning right to and from the site is possible. To mitigate any potential impact a contribution and condition is proposed to investigate the feasibility of a reduction in speed limit

surrounding the site to potentially include interventions such as additional signage, 30mph markings, coloured surfaces and rumble device to help reduce any potential risk.

- 9.129 Therefore, as TfL are the highway authority for this site and they have not objected to the scheme, on balance the approach proposed subject to highway feasibility and potential mitigation improvement works is considered acceptable.

Cycle Parking

- 9.130 258 long stay cycle parking spaces and 4 short stay cycle parking spaces in line with the draft London Plan requirements are proposed for the residential development. Each residential block would have its own cycle storage. Following TfL comments, then internal stores have been amended to provide 30% of the cycle provision as Sheffield stands with varying separations between 1.2m and 1.8 metres to accommodate larger bikes. The proposed layouts are considered acceptable, and to ensure ease of access for Blocks B and C, an internal access for future residents shall be secured via condition.

Deliveries and Servicing

- 9.131 Delivery and Servicing will take place on-site within the sites frontage and as already discussed are an important consideration for this scheme. Alongside the external/access details proposed in line with TfL recommendations a delivery and servicing strategy shall be secured via condition to ensure this has been fully considered.

Refuse and Recycling Storage

- 9.132 The proposal includes specific refuse and recycling storage areas within each block. Collection of refuse would be collected from the front of the site with the proposed arrangements considered sufficient capacity for food, mixed dry recycling and landfill waste. A bulky waste store is proposed within Block A which is considered appropriate. As part of the servicing and delivery strategy, the applicant will be expected to clarify how Blocks B and C will access this area accordingly.

Sustainable Transport

- 9.133 Given that the development would be car-free, increased walking, cycling and public transport use is expected. Therefore, a sustainable transport contribution is to be secured in the s.106 agreement to mitigate the impacts of the development and secure improvements to include pedestrian and cycling improvements, highway or bus infrastructure.
- 9.134 In order to ensure that the identified modal shift is adequately supported, and barriers to uptake of more sustainable transport modes can be addressed, a Travel Plan and monitoring for three years is to be secured through the s.106 agreement.

Sustainable Design

Carbon Emissions

- 9.135 Policy SP6.2 requires new development to minimise carbon dioxide emissions, including that new dwellings (in major development proposals) must be zero carbon.

As a minimum a 35% reduction in regulated carbon emissions over Part L 2013 is required, with the remaining CO₂ emissions to be offset through a financial contribution. The development also includes improvements within the 'Be Lean' and 'Be Green' stages in accordance with the energy hierarchy 'Lean, Clean, Green' outlined in Policy 5.2 of the London Plan by providing high levels of building fabric insulation to minimise heat loss, mechanical ventilation with heat recovery, communal air source heat pump (ASHP) system and photovoltaic panels at roof top level.

- 9.136 The scheme is expected to achieve at least a 70% reduction in on-site regulated emissions through a combination of energy demand reduction measures and the heat network. The remaining regulated CO₂ emissions shortfall would be covered by a carbon offset payment of £71,759 which would be secured through the S.106 agreement. This will be used towards funding off-site energy efficiency projects within Croydon.
- 9.137 Policy SP6.3 requires a high standard of sustainable design and construction. The sustainability statement outlines a range of measures, such as fitting water efficient fittings, diverting construction waste away from landfill, installing solar panel, green roofs, improved glazing performances, and additional planting through detailed landscape scheme as well as bird/bat boxes to enhance ecology on the site.
- 9.138 In order to ensure that the above measures are secured conditions are recommended. In addition, S.106 obligations, in the form of a carbon offsetting payment.

Water Use

- 9.139 A planning condition is recommended to secure compliance with the domestic water consumption target of 105 litre/person/day, to ensure sustainable use of resources.

Other Planning Issues

- 9.140 The Health Impact Assessment outlines how elements of the building both promote and contribute to a healthier life style for both future residents and the wider community. The car free approach, provision of substantial cycle facilities, the use of environmentally friendly techniques together with comparatively high level of open space (both communal and private) within its urban context results in a development that promotes and contributes to a more healthy lifestyle.
- 9.141 A fire safety assessment shall be conditioned to be submitted as Policy D11 of the Draft London Plan to ensure that appropriate fire safety measures have been incorporated into the building to minimise the risk of fire spread, ensure appropriate means of escape for residents and provided suitable and compliant access for firefighting equipment.
- 9.142 A TV and Radio signal impact assessment shall be conditioned and secured via s.106 to ensure that there is no interference to the reception of digital terrestrial television services or digital satellite television services.
- 9.143 In order to ensure that the benefits of the proposed development (including those required to mitigate the harm caused) reach local residents who may be impacted indirectly or directly by the proposal's impacts, a skills, training and employment strategy (for the construction phase) and a contribution towards training are to be secured by s.106 obligations.

9.144 The development is liable for a Community Infrastructure Levy (CIL) payment to ensure that development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities across the borough.

10. CONCLUSIONS

- 10.1 The proposed development would introduce a significant amount of new housing, including a mix of unit sizes and genuinely affordable housing in the form of London Affordable Rent units, as well as London Shared Ownership units. The proposed development is of a high quality design and would ensure a good standard of accommodation for new residents and their neighbours. There would be harm to heritage assets, but that harm is considered to be minimised and necessary to deliver the development's benefits (and therefore is justified), and the harm caused would be outweighed by the development's public benefits. The development would be a car-free, environmentally sustainable development and would comply with the aspirations of the Development Plan in this regard. The proposal constitutes a departure in a limited fashion, but this is outweighed by other material considerations. The residual planning impacts would be adequately mitigated by the recommended s.106 obligations and planning conditions.
- 10.2 All other relevant policies and considerations, including equalities, have been taken into account.
- 10.3 It is recommended that planning permission is granted in line with the officer recommendation for the reasons summarised in this report.

Appendix 1: Approved documents

Plans:

Drawing No	Plan Title	Revision
D1000	Existing location plan	00
D1100	Existing site plan	00
D1700	Existing elevations	00
D6100	Proposed G.A. Plan Ground floor	00
D6101	Proposed G.A. Plan Level 01	00
D6102	Proposed G.A. Plan Level 02 – 03	00
D6104	Proposed G.A. Plan Level 04 – 05	00
D6106	Proposed G.A. Plan Level 06 – 08	00
D6109	Proposed G.A. Plan Level 09 – 11	00
D6112	Proposed G.A. Plan Level 12	00
D6150	Proposed G.A. Plan Roof Plan	00
D6199	Proposed G.A. Plan Lower Ground Floor	00
D6200-A	Block A Floor Plan Level 00 – Ground	00
D6200-B	Block B Floor Plan Level 00 – Ground	01
D6200-C	Block C Floor Plan Level 00 – Ground	01
D6201-A	Block A Floor Plan Level 01	00
D6201-B	Block B Floor Plan Level 01	00
D6201-C	Block C Floor Plan Level 01	00
D6202-A	Block A Floor Plan Level 02 – Level 11	00
D6202-B	Block B Floor Plan Level 02 – Level 11	00
D6202-C	Block C Floor Plan Level 02 – Level 11	00
D6204-C	Block C Floor Plan Level 04 – 05	00
D6206-B	Block B Floor Plan Level 06 – 09	00
D6299-A	Block A Floor Plan Level 00 – Ground	01
D6500	Site Section proposed	00
D6520	Block B Proposed Section	00
D6710	Site Elevations Proposed	00

D6711	Site Elevations Proposed	00
D6720	Block A proposed Elevations	00
D6721	Block A proposed Elevations	00
D6722	Block A proposed Elevations	00
D6723	Block A proposed Elevations	00
D6726	Block B proposed Elevations	00
D6727	Block B proposed Elevations	00
D6728	Block C Proposed Elevations	00
D6729	Block C Proposed Elevations	00
D6750	Materials and Architectural Details Block A	00
D6751	Materials and Architectural Details Block B	00
C0115 L099	Lower ground floor general arrangement plan	1
C0115 L100	Ground floor general arrangement plan	1
C0115 L101	1 st floor general arrangement plan	1
C0115 L120	Combined roof plan	1
C0115 L999	Lower ground floor illustrative masterplan	1
C0115 L1000	Ground floor illustrative masterplan	1
C0115 L1001	1 st floor illustrative masterplan	1
C0115 L1200	Combined roof plan illustrative masterplan	1
C0115 L500	GF Sections Sheet 01 of 01	1
C0115 L501	GF Sections Sheet 02 of 02	1
C0115 L1300	Urban Greening Factor Landscape Areas	00
CCL 10520 TCP	Tree Constraints Plan	2
CCL 10520 IAP	Impact Assessment Plan	2
CCL 10520 TPP	Tree Protection Plan	3

Documents:

- Covering Letter
- Update Covering Letter
- CIL Forms
- Planning Application Form
- Planning Statement
- Design and Access Statement
- Landscape Design and Access Statement
- Energy Strategy v2

- Daylight Sunlight v3
- Air Quality Report v2
- Archaeological Written Scheme of Investigation
- Archaeological Desk Based Assessment
- Ecological Appraisal
- Flood Risk Assessment and SuDS Strategy
- Croydon SuDS proforma
- SuDS developer checklist
- Health Impact Assessment
- Noise Impact Assessment
- Statement of Community Involvement
- Sustainability Statement
- Heritage and Townscape Visual Impact Assessment
- Transport Statement
- Framework Travel Plan
- Framework Construction Logistics Plan
- Stage 1 Road Safety Audit
- Covering letter response to TfL.
- Arboricultural Method Statement
- Tree Report
- Tree Schedule
- Financial Viability Assessment
- Pedestrian Wind Environment Statement

Appendix 2: Planning Policies and Guidance

The following lists set out the most relevant policies and guidance, although they are not exhaustive and the provisions of the whole Development Plan apply (in addition to further material considerations).

London Plan (2016)

- Policy 1.1 Delivering the strategic vision and objectives for London
- Policy 2.1 London in its global, European and United Kingdom context
- Policy 2.2 London and the wider metropolitan area
- Policy 2.3 Growth areas and co-ordination corridors
- Policy 2.6 Outer London: vision and strategy
- Policy 2.7 Outer London: economy
- Policy 2.8 Outer London: transport
- Policy 2.15 Town centres
- Policy 2.18 Green Infrastructure
- Policy 3.1 Ensuring equal life chances for all
- Policy 3.2 Improving health and addressing health inequalities
- Policy 3.3 Increasing housing supply
- Policy 3.4 Optimising housing potential
- Policy 3.5 Quality and design of housing developments
- Policy 3.6 Children and young people's play and informal recreation facilities
- Policy 3.7 Large residential developments
- Policy 3.8 Housing choice
- Policy 3.9 Mixed and balanced communities
- Policy 3.10 Definition of affordable housing

- Policy 3.11 Affordable housing targets
- Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 Affordable housing thresholds
- Policy 3.15 Co-ordination of housing development and investment
- Policy 4.1 Developing London's economy
- Policy 4.7 Retail and town centre development
- Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services
- Policy 4.12 Improving opportunities for all
- Policy 5.1 Climate change mitigation
- Policy 5.2 Minimising emissions
- Policy 5.3 Sustainable design & construction
- Policy 5.7 Renewable energy
- Policy 5.8 Innovative energy technologies
- Policy 5.9 Overheating and cooling
- Policy 5.10 Urban greening
- Policy 5.11 Green roofs and development site environs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.14 Water quality and wastewater infrastructure
- Policy 5.15 Water use and supplies
- Policy 5.16 Waste net self-sufficiency
- Policy 5.17 Waste capacity
- Policy 5.18 Construction, excavation and demolition waste
- Policy 5.21 Contaminated land
- Policy 6.1 Strategic approach
- Policy 6.2 Providing public transport capacity and safeguarding land for transport
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.4 Enhancing connectivity
- Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
- Policy 6.7 Better streets and surface transport
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.11 Smoothing traffic flow and tackling congestion
- Policy 6.12 Road network capacity
- Policy 6.13 Parking
- Policy 7.1 Lifetime neighbourhoods
- Policy 7.2 An inclusive environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Policy 7.6 Architecture
- Policy 7.13 Safety, security and resilience to emergency
- Policy 7.14 Improving air quality
- Policy 7.15 Reducing noise and enhancing soundscapes
- Policy 7.19 Biodiversity and access to nature
- Policy 7.21 Trees and woodlands
- Policy 8.1 Implementation
- Policy 8.2 Planning obligations
- Policy 8.3 Community infrastructure levy

Emerging New London Plan

- SD1 Opportunity areas
- SD6 Town centres and high streets
- SD7 Town centres: development principles and development plan documents
- SD10 Strategic and local regeneration
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agents of change
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix
- S1 Developing London's social infrastructure
- S4 Play and informal recreation
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- S11 Improving air quality
- S12 Minimising greenhouse gas emissions
- S13 Energy infrastructure
- S14 Managing heat risk
- S15 Water infrastructure
- S16 Digital connectivity infrastructure
- S17 Reducing waste and supporting the circular economy
- S112 Flood risk management
- S113 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T6.3 Retail parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations

Croydon Local Plan (2018)

Strategic Policies

- Policy SP1: The Places of Croydon
- Policy SP2: Homes
- Policy SP3: Employment
- Policy SP4: Urban Design and Local Character
- Policy SP6: Environment and Climate Change
- Policy SP7: Green Grid
- Policy SP8: Transport and Communication

Development Management Policies

- Policy DM1: Housing choice for sustainable communities
- Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres
- Policy DM8: Development in edge of centre and out of centre locations
- Policy DM10: Design and character
- Policy DM11: Shop front design and security
- Policy DM13: Refuse and recycling
- Policy DM14: Public Art
- Policy DM15: Tall and Large Buildings
- Policy DM16: Promoting Healthy Communities
- Policy DM17: Views and Landmarks
- Policy DM18: Heritage assets and conservation
- Policy DM23: Development and construction
- Policy DM24: Land contamination
- Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk
- Policy DM27: Protecting and enhancing our biodiversity
- Policy DM28: Trees
- Policy DM29: Promoting sustainable travel and reducing congestion
- Policy DM30: Car and cycle parking in new development
- Policy DM33: Telecommunications

Place-specific policies

- Policy DM42: Purley District Centre and its Environs

Supplementary Planning Guidance (SPG) / and Documents (SPD)

London

- Culture and Night-Time Economy (November 2017)
- Affordable Housing & Viability (August 2017)
- Crossrail Funding (March 2016)
- Housing (March 2016)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Town Centres (July 2014)
- Character and Context (June 2014)
- London Planning Statement (May 2014)
- Sustainable Design and Construction (April 2014)
- Play and Informal Recreation (September 2012)

- All London Green Grid (March 2012)
- London View Management Framework (March 2012)
- London's Foundations (March 2012)
- Planning for Equality and Diversity in London (October 2007)

Croydon

- Croydon Opportunity Area Planning Framework 2013 (adopted by the Mayor and Croydon)
- Designing for community safety SPD
- SPG 12: Landscape design
- Public Realm Design Guide 2019
- Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy–Review 201

Appendix 3: BRE Guidance Terms

Daylight to existing buildings

The BRE Guidelines stipulate that the diffuse daylighting of the existing building may be adversely affected if either:

- the vertical sky component (VSC) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value (or reduced by more than 20%) known as “the VSC test” or
- the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value known as the “daylight distribution” (DD) test.

Sunlight to existing buildings

The BRE Guidelines stipulate that the sunlight of an existing window may be adversely affected if the centre of the window:

- receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of annual winter probable sunlight hours between 21 September and 21 March (WPSH); and
- receives less than 0.8 times its former sunlight hours (or a 20% reduction) during either period; and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

If one of the above tests is met, the dwelling is not considered to be adversely affected.

Daylight to new buildings: Average Daylight Factor (ADF)

The ADF test calculates the average illuminance within a room as a proportion of the illuminance available to an unobstructed point outdoors, under a sky of known illuminance and luminance distribution.

The BRE Guidelines stipulate that kitchens should attain at least 2% ADF, living and dining rooms at least 1.5% ADF and bedrooms at least 1% ADF.

Sunlight to gardens and outdoor spaces

The BRE guidelines look at the proportion of an amenity area that received at least 2 hours of sun on 21st March. For amenity to be considered well sunlight through the year, it stipulates that at least 50% of the space should enjoy these 2 hours of direct sunlight on 21st March.