

**1.0 SUMMARY OF APPLICATION DETAILS**

Ref: 21/01753/FUL  
 Location: 26 to 52 Whytecliffe Road South and Purley Station Car Park, CR8 2AW  
 Ward: Purley and Woodcote  
 Description: Demolition of the existing three terraces of houses, redevelopment of these and the existing surface level car park. Erection of a part 6/part 8/part 9 storey building and separate part 4/part 5 storey building to provide 238 residential units with replacement station car park, together with ancillary community indoor space, disabled car parking, communal amenity space and improvements to the public realm on Whytecliffe Road South.  
 Drawing Nos: 05100 Rev 10, 05101 Rev 09, 05102 Rev 09, 05103 Rev 10, 05104 Rev 10, 05105 Rev 09, 05106 Rev 08, 05107 Rev 09, 05108 Rev 09, 05150 Rev 08, 05199 Rev 09, 05200 - AB Rev 18, 05200 - CD Rev 17, 05200 - E Rev 09, 05201 - AB Rev 07, 05201 - CD Rev 09, 05201 - E Rev 05, 05202 - AB Rev 05, 05202 - CD Rev 08, 05202 - E Rev 05, 05203 - AB Rev 05, 05203 - CD Rev 08, 05203 - E Rev 05 , 05204 - AB Rev 05, 05204 - CD Rev 08, 05204 - E Rev 07, 05205 - AB Rev 05, 05205 - CD Rev 08, 05206 - AB Rev 10, 05206 - CD Rev 08, 05207 - AB Rev 08, 05207 - CD Rev 08, 05208 - AB Rev 07, 05299 - AB Rev 14, 05299 - CD Rev 18, 05299 - E Rev 10, 05500 Rev 05, 05501 Rev 04, 05502 Rev 05, 05503 Rev 06, 05504 Rev 05, D5506 Rev 02, D5507 Rev02, D5508 Rev 01, D5509 Rev 01, 05700 Rev 08, 05701 Rev 09, D5702 Rev 07, D5703 Rev 06.  
 Applicant: RAA Development Group Ltd, Regent Land and Fund  
 Agent: Mr Richard Quelch of Q Square  
 Case Officer: Barry Valentine

	<b>Market Housing</b>	<b>Affordable Rent</b>	<b>Intermediate</b>	<b>TOTAL</b>
<b>Studio</b>	24	4	5	33
<b>One-bed</b>	50	2	8	60
<b>Two-bed</b>	41	30	14	85
<b>Three-bed</b>	49	9	2	60
<b>TOTAL</b>	164	45	29	238

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
<u>Residential</u> 7 disabled residential parking spaces	413 long stay and 7 short stay on site cycle parking spaces
<u>Station</u> 125 station car parking spaces 17 station motorcycling parking spaces 2 car club spaces	<u>Cycle Hub</u> 101 space cycle hub, including 15 e-scooter.

- 1.1 This application is being reported to Planning Committee because:
- Objections above the threshold in the Committee Consideration Criteria have been received.
  - Ward Councillor representation and referral request (Cllr Badsha Quadira and Cllr Holly Ramsey) in accordance with the Committee Considerations Criteria.
  - It is a residential development containing 200 or more dwellings

## 2.0 RECOMMENDATION

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

A. Any direction by the London Mayor pursuant to the Town and Country Planning (Mayor of London) Order (2008)

B. The prior completion of the legal agreement to secure the following planning obligations:

### Affordable Housing

1. 31.7% affordable housing (by habitable room) with 65.4% at London Affordable Rent (LAR) and 34.6% Shared Ownership (SO).
2. Early and late stage affordable housing reviews.

### Transport

3. Highway works (through S.278 highways agreement) - to include (but not limited to):
  - a. Removal of heavy duty crossover and reinstatement as footway,
  - b. Removal of redundant crossovers (dropped kerbs) and reinstatement as footway,
  - c. Construction of vehicular crossover to suit new site layout
  - d. Resurfacing the footway and carriageway to the extents of the Planning Application Site,
  - e. Remedying any damage to the carriageway resulting from construction activity,
  - f. Revision of existing on-street parking arrangement and amendments of associated traffic orders,
  - g. Relocation/Installation of street lighting to suit new site layout,
  - h. Installation of street trees and associated drainage (soil cells if required),

- i. Adoption of new roads/paths, subject to technical approval,
  - j. Improvements to road drainage,
  - k. Revision of cycle lane to suit new site layout.
4. Potential to enter into S.38 agreement for adoption by the Council of reconfigured footway (with maintenance contribution secured)
  5. Permit free development
  6. Controlled Parking Zone (CPZ) expansion financial contribution (£25,000)
  7. Onsite car club spaces (two) and residential occupiers' membership for three years where requested by resident
  8. Residential travel plan
  9. Railway Station travel plan
  10. Railway Station car park monitoring and review mechanisms
  11. Cycle hub
  12. Sustainable travel contribution (£357,000)
  13. Funding of upgraded bus stand shelter with countdown timer.

#### Environmental

14. Financial contribution to street tree planting including maintenance (£2,610)
15. Carbon offset financial contribution (£176,823)
16. Be Seen monitoring clauses
17. Air quality contribution (£24,200)

#### Design

18. Retention of scheme architects
19. Public art clauses

#### Public realm

20. Public realm delivery

#### Employment and Training

21. Local Employment and Training Strategy (LETS)
22. LETS contribution – construction phase (£143,599)

#### Other

23. Community use (including securing free use for 20 hours per week)
24. Monitoring fees
25. Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration.

- 2.2 That the Director of Planning and Sustainable Regeneration has delegated authority to negotiate the legal agreement indicated above.
- 2.3 That the Director of Planning and Sustainable Regeneration has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

## Conditions

1. In accordance with the approved plans.
2. Development to be implemented within three years.

### Pre-commencement (pre-demolition)

3. Demolition and construction logistics plan.
4. Archaeology.
5. Station car parking mitigation strategy during construction.

### Pre-commencement (save for demolition)

6. Groundwater flooding investigation and mitigation.
7. Land contamination – site investigation and remediation.
8. Fire strategy.

### Prior to above ground works

9. Samples and details (as appropriate) of materials including window frames and balustrades. Brick sample panel.
10. Detailed design drawings.
11. Station car park entrance design and legibility.
12. Secure landscaping proposals including replacement trees, with additional details secured via condition including on play space detailed design. Must meet minimum Urban Greening Factor of 0.5.
13. Secure by Design and Park Mark Safer Parking Scheme for station car park.
14. Agent of change conditions in regard to aggregates site.
15. BRE solar dazzle report.
16. Wind mitigation to balconies.
17. Ecological mitigation and enhancement scheme including bat protection measures (where necessary).

### Prior to occupation

18. Delivery service plan and loading bays.
19. Secure lighting plan.
20. Balcony and terrace management plan.
21. Installation of privacy screens and obscured glazing.
22. Station car park management plan including car club.
23. Communal area management plan stipulating access to all communal areas (rooms and outside space) for all residents within both blocks.
24. Building maintenance strategy including cleaning.

### Compliance

25. Provision of on-site car parking – prior to occupation and permanently retained thereafter. Electric vehicles charging point for all disabled parking spaces, with 20% active and 80% passive provision for station car park.
26. Cycle parking – implementation.
27. Secure energy assessment.
28. Secure noise impact assessment, acoustic design statement, ventilation strategy.
29. Secure air quality assessment and air quality neutral assessment.
30. Secure whole life cycle.

31. Secure circular economy statement.
32. Refuse to be built and completed prior to occupation.
33. Secure arboricultural method statement.
34. Secure flood risk assessment and drainage strategy.
35. Noise from any plant and machinery.
36. 90% of units to meet M4 (2) accessibility standard.
37. 10% of units to meet M4 (3) accessibility standard, with minimum set percentages of unit types in terms of bedrooms.
38. Water use target.
39. Removal of permitted development rights for telephone masts.
40. Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration.

### **Informatives**

1. Community Infrastructure Levy.
  2. Subject to legal agreement
  3. Thames Water Advice
  4. Pollution and Noise from Demolition and Construction Sites Guidance.
  5. Waste Informative
  6. Refuse Informative
  7. Removal of site notices
  8. Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration.
- 2.4 Furthermore, the Planning Committee confirms that the Director of Planning and Sustainable Regeneration has delegated authority, prior to issuing of planning permission, to consider further bat survey(s) to be carried out and to impose appropriate conditions, if necessary, in regard to mitigation measures dependant on the result of the bat survey(s). Any survey(s) will be reviewed by an appropriately qualified ecologist on behalf of the Local Planning Authority. In the unlikely event that the appropriately qualified ecologist is of the opinion that conditions would not be sufficient to mitigate the harm, the Director of Planning and Sustainable Regeneration has delegated authority to refuse planning permission, or in the event that the recommendation would be to grant planning permission despite the advice of the ecologist, then the application shall return to Planning Committee to receive a fresh resolution.
- 2.5 That the Planning Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.6 That the Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the Webb Estate and Upper Woodcote Village Conservation Area as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.7 That, if within 4 months of the planning committee meeting date, the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration has delegated authority to refuse planning permission.

### **3.0 BACKGROUND**

#### **Place Review Panel** (now known as Design Review Panel)

3.1 The proposal was presented to the Place Review Panel (PRP) on three occasions.

3.2 The proposal was first presented to Place Review Panel on the 21<sup>st</sup> February 2019. The site was presented as part of a larger masterplan, which also included nos. 64 to 74 Whytecliffe Road North and land between the two sites i.e. the vacant health centre, Purley Social Club and Elysuim House. The comments most relevant to this development were as follows:

- The Panel felt the scheme had great potential to make a very positive contribution to the townscape of Purley and provide high quality residential accommodation and supported some of the approaches towards the elevational treatment, in particular the subtle use of brickwork.
- The Panel felt that all efforts should be taken to encourage Network Rail to bring forward its site simultaneously to allow for a comprehensive development of the 'masterplan' area.
- The amenity and play space provision required further development.
- Given its central location, the development requires its own unique character and to avoid overly repetitive elevational treatments which were giving the development a monolithic appearance.
- The height should vary more within the development to provide design interest.
- Prominent corners should be given considerable attention.
- The public realm and landscape design requires substantial development.

3.3 On the 29<sup>th</sup> May 2020, a larger version of the scheme was presented for a second time to PRP. The scheme was up to ten storeys high, consisting of 272 residential units and 179 car parking spaces.



Figure 1 – Scheme presented to PRP on the 29<sup>th</sup> May 2020

3.4 The PRP in their response were pleased to see a comprehensive redevelopment which included the car park; but they considered the scheme to be an overdevelopment. It was felt that 10 storeys was too tall, and that the top floor elements did not work well in terms of their proportion or architecture. Whilst it was felt that the “Mansion Block” typology could work, there were concerns on whether it was contextually appropriate for Purley. It was felt that the design would need to work harder to prevent a dominating street frontage and break down the long continuous frontage. Further development of communal spaces, design of refuse/cycle stores, servicing and giving entrances prominence was identified as necessary.

3.5 On the 29<sup>th</sup> October 2020, a version similar to the current scheme was presented to PRP. The development was one storey lower than the scheme previously considered by PRP in May 2020, with the final storey also set back further than the previous final storey. There was also additional design development.

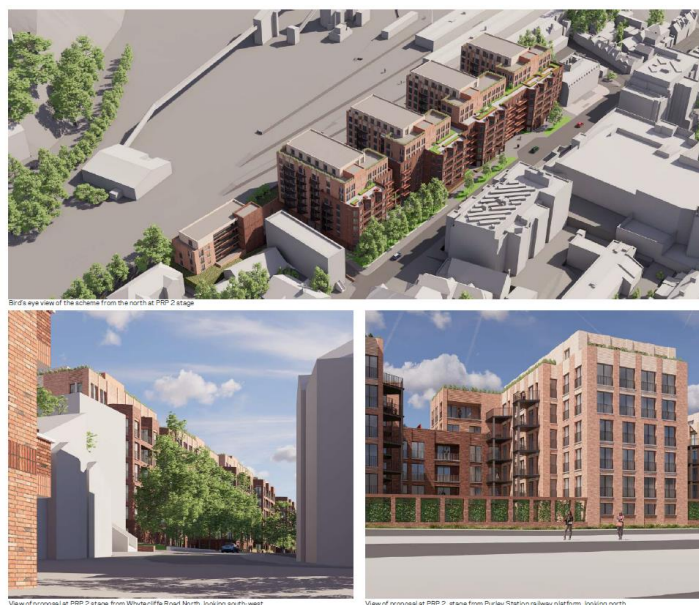


Figure 2 – Scheme presented to PRP on the 29<sup>th</sup> October 2020

3.6 The scheme was positively received by the PRP panel. A summary of the advice is outlined below:

- The panel commented that the massing appeared much more comfortable, with proportions more resolved. Whilst the 8 storey limit set by the place specific policy was technically breached, the panel was encouraged by how the top floor was recessed to minimise it's visual impact. The height, despite the policy breach, and subject to other issues being resolved, was considered by the panel to be acceptable.  
*Officer response: officers assessment aligns with the views of the panel.*
- The panel suggest exploring further amendment to the massing of the upper floors to create sky gaps, exploring greater separation between the fingers and having a more rectilinear plan form.  
*Officer response: the creation of sky gaps and introduction of greater separation distances would reduce the number of residential units proposed, especially the latter. This in turn is likely to have significant impacts on viability and the affordable housing offer. Sky gaps in particular are considered to offer very little design benefit, given visibility and common experience perception of the development. A more rectilinear form would reduce opportunities for secondary aspect and could make development more monotonous and imposing.*
- The panel agreed with the applicant that the mansion block bays should be the main focus of the form. They felt the car park entrance detailing was inadequate, and that there was need for more distinction between public and private on the elevation. Further detail exploration was recommended in terms of brick texture, design quality of rear elevation, window alignment and balcony design.  
*Officer response: Design has continued to evolve through the process to add interest and differentiation. Public art commitments also provide further opportunity to enhance the design and create interest.*
- The panel were supportive of the landscape narrative, including different character to each courtyard, but questioned how these were linked. They asked for landscape quality to be further improved given number of users and for consideration to be given to the interface between homes and communal spaces.  
*Officer response: The landscaping design has continued to evolve. The communal spaces will be interlinked by generous passageways, details of which have been provided. Officers are satisfied that there would be sufficient protection offered by landscaping to protect resident windows that looks onto communal spaces.*
- The panel raised concerns over tightness of the standalone northern block, including communal space provision, servicing arrangements, entrance arrangements, pavement routing/arrangements and placement of street furniture.  
*Officer response: Block E is considered appropriate response that utilises this challenging part of the site.*
- The panel were encouraged by the further reduction of single aspect units. They highlighted that it was important to ensure that balconies comply with space standards.



*Officer response: Further reductions in the number of single aspect unit has occurred since PRP. The balconies/terrace/garden areas are appropriately designed and sized.*

- 3.7 Officers are satisfied that the PRP response, which were generally minor points of detail, have been addressed as far as reasonably possible. Any outstanding issues can be satisfactorily secured by condition or are necessary parts of the scheme to optimise development potential.

### **Pre-Application Planning Committee**

- 3.8 The proposal was presented to the Planning Committee as a Developer Presentation on two occasions.

- 3.9 An earlier version of the proposal was presented to Planning Committee at pre-application stage on the 11<sup>th</sup> April 2019. It was presented as part of a larger redevelopment that also included nos. 64 to 74 Whytecliffe Road North and land between the two sites i.e. the vacant Health Centre, Purley Social Club and Elysuim House. A summary of the advice that members gave is outlined below:

- Positive feedback on the proposal with it being noted that the scheme was developing well. Members liked the idea that the sites were to be used for residential, which would help revitalise the local economy.
- Some members suggested the applicant should explore additional height on sites A (application site), B and C (26 to 52 Whytecliffe Road South) and address the issue of stepping down and whether this was an appropriate design solution, subject to daylight and sunlight.
- Members welcomed the 30% affordable housing offer and would welcome more.
- The balconies must be useable and recessed. Glass balconies and screens are not supported by Members.
- The building rhythm is working well with the height and massing. The applicant should explore distinct brickwork and detailing to help with the architecture and rhythm.
- Members were satisfied with the level of parking given the accessible location.
- The play areas should not be segregated between market and affordable housing and the access to these areas must be well considered.
- Mitigation for the site from railway noise must be designed at an early stage.

- 3.10 An earlier version of the proposal was presented for a second time to Planning Committee at pre application stage on the 23<sup>rd</sup> September 2020. It is worth noting that this meeting took place after the first Place Review Panel (May 2020), and before the second Place Review Panel (October 2020). The main difference being the scheme presented at the first Place Review Panel and one presented at committee was the two end main blocks had been reduced in height from 10 storeys to 9 storeys, with the final storeys also further recessed. However, the two central blocks remained at 10 storeys high. Following Committee and before the second Place Review Panel, these middle block were dropped to 9 storeys.



Figure 3 - Scheme presented to Committee at pre application stage on the 23rd September 2020.

### 3.11 A summary of the Committee's feedback is as follows:

- There were mixed views on scale and mass. Some members felt that the scheme was developing well and supported the mansion block typology, which they felt was well considered. There was support for the fact that comprehensive redevelopment was being put forward, as well as some support for going taller. Other members felt it was overdevelopment and felt that the opinion of the PRP should be listened to more closely, especially given their expertise. There were concerns over the 10-storey height that breached place policy. The development was felt to be out of context and there were concerns over how it would appear at street level.

*Officer response: The proposed development had been reduced by a storey since Committee. This amended scheme was presented to Place Review Panel who were generally supportive of the development including its height. The development appropriately balances optimising the site, whilst delivering a locally responsive form that has a positive relationship to the context.*
- Members welcomed the improvement to public realm, and highlighted how this was necessary to support the increased footfall.

*Officer response: This welcomed improvement forms part of the current planning application and is a significant benefit in the application's favour.*
- Some members felt that materiality should be explored further, including different material for the top. Members wanted Purley character to be incorporated into the scheme more. Further consideration should be given to how the scheme would appear from the train line and station.

*Officer response: The scheme has evolved with additional detail added with areas of public art also proposed that can further help connect the development with its locality. The materials are high quality and robust, and the use of brick is considered successful, especially in the context of proportions and mansion block typology.*

- Members wished for the community use, that was previously proposed to be reinstated.  
*Officer response: This has been reinstated, with a 148 sq.m space provided that would be available to be used by the community free of charge for 20 hours per week.*
- A number of members expressed their disappointment by the low number of three beds (just 23 homes).  
*Officer response: This has been increased to 60 homes, but this remains below policy expectations This shortfall is considered to be outweighed by the benefits that the scheme would deliver.*
- There was support for public realm and biodiversity measures. Although the use of green roofs and green walls was felt needed to be developed further.  
*Officer response: Roof areas have been developed further and their utility has been maximised balancing amenity space provision, urban greening and sustainable energy generation.*
- There were concerns over lack of playspace provision and quality of amenity space, including light they would receive. Concerns on air quality, noise and dust from day aggregates.  
*Officer response: The proposed development exceeds policy in terms of playspace provision. The amenity space is generously sized, featuring high quality landscaping, and main communal amenity space due to their positive orientation would receive excellent sunlight levels. External amenity spaces would have acceptable air quality and noise environments, due to existing controls around the aggregates site.*
- Concern over single aspect units, and impact of the development on neighbouring properties' light.  
*Officer response: The number of single aspect units has been reduced. Those homes that do remain as single aspect are justifiable balancing up townscape and design considerations, and need to optimise number of homes that this highly sustainable location can supply.*
- Stressing of importance of affordable housing offer, with a particular need for London Affordable Rent.  
*Officer response: The development has a 31.7% affordable housing offer by habitable room, of which 65.4% is London Affordable Rent.*
- Concern over infrastructure in terms of schools and GP availability.  
*Officer response: The application would be liable for CIL, which will mitigate the impact of the development on local infrastructure.*
- Support for the public consultation carried out by the applicant.  
*Officer response: noted.*

3.12 A number of key changes have been made to the scheme following PRP and Planning Committee feedback, as well as ongoing dialogue with officers, summarised below:

- The proposed development has reintroduced a community use and increased the number of three bed residential homes.
- A reduction in height of the development from 10 storey to 9 storey resulting in improved proportions and relationship with context. Introduction of increased set back particularly on southwestern elevation to improve

relationship in views from street. Public art area has been enlarged, with draft strategy developed. Improvements to architectural detail including architectural expression of entrance.

- Reduction of number of single aspect units, and improvement to residential quality through layout modifications and design evolution. Increased in extant of playspace and improved connectivity between communal spaces including quality of spaces. Landscaping development including planting of additional trees.
- Improved sustainable transport provision, including provision of cycle hub.
- Changes to ensure that development complies with latest policies, notably London Plan (2021).

#### **4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- 4.1 The provision of 238 high quality residential homes would make a notable contribution to housing delivery in a highly sustainable location that has very good access to shops, facilities and public transport.
- 4.2 The proposed development would provide 31.7% affordable housing by habitable room, which amounts to 74 homes, at a 66:44% split between London Affordable Rented (LAR) homes and intermediate shared ownership (SO) homes. This offer has been independently scrutinised and is the maximum reasonable affordable housing policy compliant provision.
- 4.3 The proposed development would provide 60 three bed units, which amounts to 25% three bed offer, which is below policy requirements of 40%. However, the planning benefits of the scheme, specifically the affordable housing offer, outweigh this.
- 4.4 The proposed development, at a maximum height of nine storeys, is in excess of the height parameter set out in the Purley Place policy (development should complement the existing predominant building heights of 3 to 8 storeys). Nevertheless as confirmed through case law, the fact that the scheme does not comply with the locational aspects of the tall building policy are not necessarily fatal to the scheme. In this instance the proposed development has a high quality design with an appropriate visual and townscape relationship, with well-considered appropriate form, that is a site specific design led response to the site's potential. The development does not cause harm to views, including preserving the setting of designated heritage assets. There would be less than substantial harm to non-designated heritage assets, namely Local Heritage Area and Purley Station, but this would be outweighed by the benefits the development provides. The development features high quality detailing and robust attractive and contextually appropriate materiality. There would be significantly enhanced public realm and enhance pedestrian experience, in an important location on a notable pedestrian route to station.
- 4.5 The proposed development would cause a significant loss of light to neighbouring properties. However, the cause of this is not from an overdevelopment of the site, but from design and layout of the impacted

properties. Any impact is largely unavoidable if the site is to be meaningfully developed and the benefits of the site optimised. The proposed development would not cause demonstrable harm to neighbouring privacy and outlook.

- 4.6 The standard of residential accommodation would be acceptable, with all homes meeting the Nationally Described Space Standards (NDSS), having sufficient private amenity space and access to well-designed communal amenity which includes large areas of child play space. All homes would have an acceptable level of access to light and outlook.
- 4.7 The proposed development is in a highly sustainable well-connected location which makes the residential element suitable to be car free, with exception of disabled parking provision. The level of Purley Rail station car parking provision is an appropriate balance between conflicting objectives, ensuring an improvement over the current status quo in terms of reducing car reliance, whilst ensuring an allocated site can be delivered, importantly securing significant public benefits including significantly improved and maintained public realm/pedestrian environment, affordable housing and cycle hub.
- 4.8 The proposed development would result in the loss of largely low-quality trees. These trees would be replaced with a greater number of trees, including the provision of a tree lined public realm.
- 4.9 The proposed development would be environmentally sustainable, enhancing biodiversity through urban greening, achieving as close to possible greenfield water run-off rates (thus ensuring a significant betterment over the current status quo) and would meet zero carbon targets via offsetting contribution.
- 4.10 Suitable planning obligations and conditions have been recommended in order to ensure that the proposed development does not have an adverse impact upon either air quality and would result in a betterment in terms of surface water flooding. The development subject to condition, would not unduly impact the operation of the aggregates site.

## **5.0 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

- 5.1 Planning permission is sought for the demolition of the existing three terraces of houses, redevelopment of these and the existing surface level Purley Rail station car park. with the erection of a part 6/part 8/part 9 storey building and separate part 4/part 5 storey building to provide 238 residential units together with replacement station car park, ancillary community indoor space, disabled car parking, communal amenity space and improvements to the public realm on Whytecliffe Road South.



Figure 4 – CGI of the proposed scheme

5.2 The proposed development is made up of four main mansion blocks, which for the purpose of this submission have been named blocks A to D, with block A located at the southern end. There is a separate detached block (known as block E) that would be located within a northern spur of the site, that runs northeast behind 58 Whytecliffe Road South's rear elevation (and beyond).

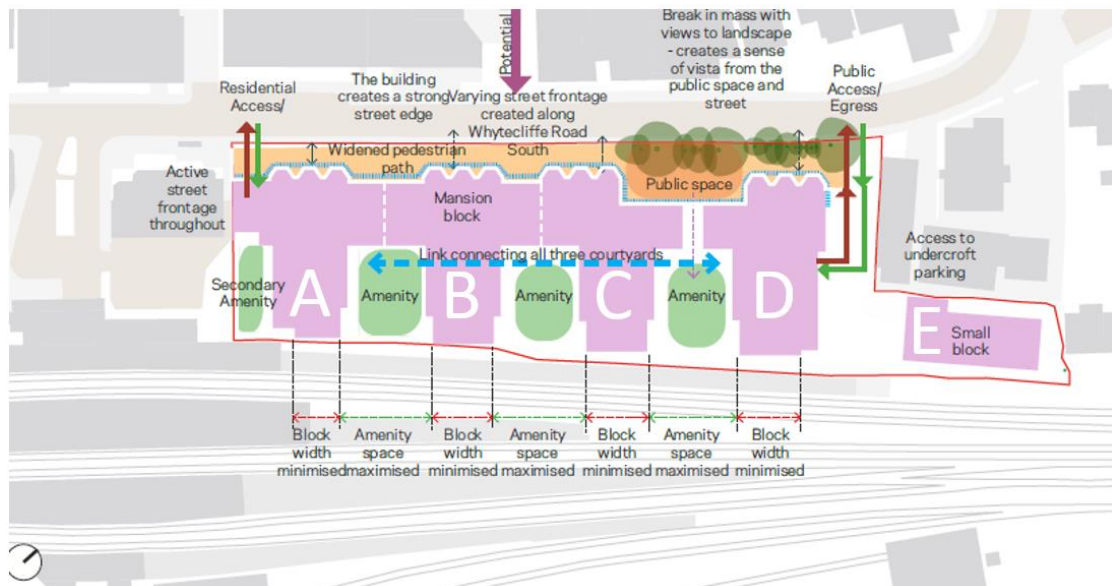


Figure 5 – Illustrative layout drawing with block name label

- 5.3 Each of the main mansion block buildings have a broad T shape, with the horizontal element of the T running parallel to Whytecliffe Road South, and the vertical finger like element extending southwest towards the rail line. In between the fingers elements are courtyard amenity spaces.
- 5.4 The mansion blocks main bulk that faces onto Whytecliffe Road South are six storeys high, before forming an additional two storey set back storey. There is then a final ninth storey located predominantly over the finger like elements.
- 5.5 There are level changes across the site, with the street being approximately 3m higher at the southern end than it is at the northern end. The massing responds

to this by stepping down half a storey, halfway along the length of the front façade. The rear of the site is up to 6m higher at the rear than it is at the front.

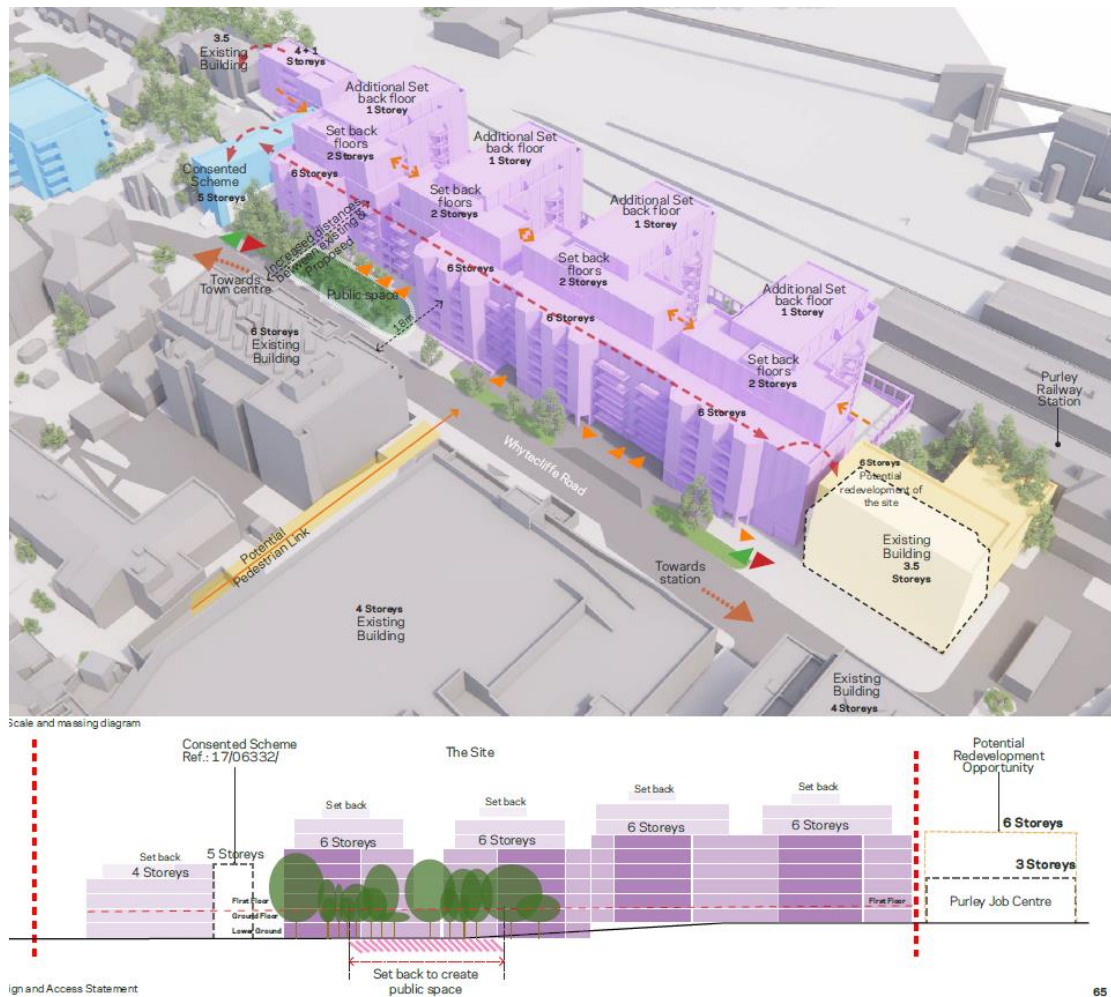


Figure 6 – Illustrative heights (note this does not include revisions to the massing made post submission)

- 5.6 The development is largely residential, but with a car park for Purley Railway station that would be set over lower and ground floor level, utilising the changing land level. The station car park is accessed from the northern end of the site. There is a separate residential car park containing disabled parking accessed from the southern end. There is a community use located in the centre of the site, in the frontage of block B, shown in blue below.



Figure 7 – Lower ground and ground proposed floor plans

- 5.7 The northern rear detached block E is a part 4/part 5 storey building that has a lower ground floor projecting entrance element.

### Amendments

- 5.8 The scheme has evolved during the course of the application due to ongoing engagement. Re-consultation was carried out on the 14<sup>th</sup> August 2023. A summary of the main amendments are set out below:

#### Design

- The seventh and eighth floor southern end has been set back further, with the setback increased from 1.5m to 5.5m. There was a reduction in height of lift overruns.



Figure 8 – CGI showing prior (left) and after 14<sup>th</sup> August 2023 amendment (right)

- Introduction of bay window features and obscure glazing on block E's northern elevation to help reduce the development's impact on privacy.
- Amendments to the layout and introduction of openings to increase the number of homes with a secondary aspect.
- Introduction of a second core to blocks A to D for fire safety, with associated reconfiguration of unit types.
- Introduction of brick detail coursing above window openings echoing historic brickwork patterns found in the area.
- Additional refinement of floor design including installation of additional windows to cycle stores, community space and blank frontage areas,



modification to ground floor perforated screen designs and redefining pre cast plinth design and increasing shadow gap sizes. Additional windows have been added to block E.

- Enlargement of potential public art area to include large parts of the ground floor main street facing elevation.
- Privacy screen design improvement and modification to balcony design to increase density of railing at lower portion to assist privacy.

#### Broader Changes

- Reduction in the number of homes from 244 to 238, and alterations to the unit mix including an increase in the number of three bedroom homes.
- Reduction in the number of station car parking spaces from 175 to 125.
- Small reduction in affordable housing offer from 32.3% to 31.7%.
- Alterations to a number of technical documents to improve compliance with policy or to provide clarifications.

5.9 A further set of revision were received on the 21<sup>st</sup> March 2024. The revisions proposed very minor elevation changes (and hence formal re-consultation was not required), which are summarised below:

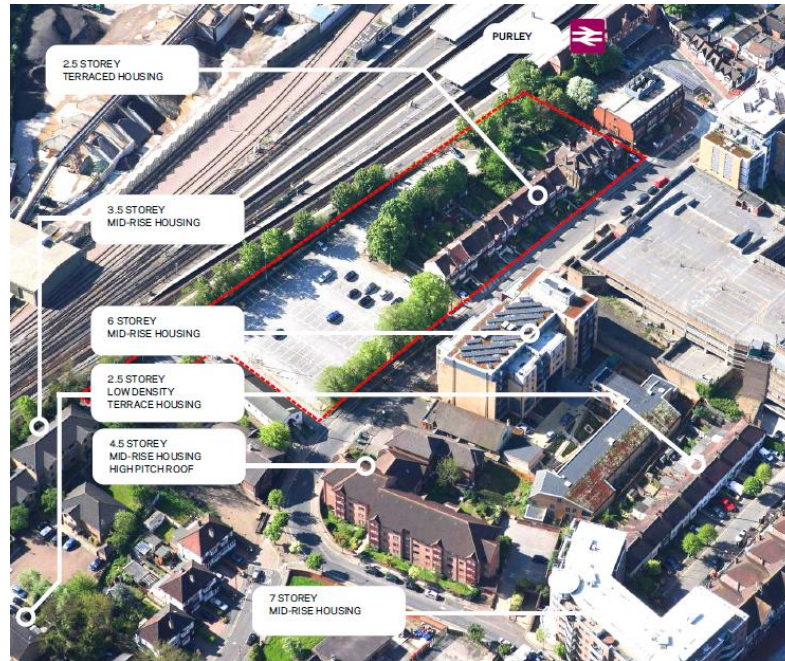
- Introduction of window header detail to first six storeys.
- Fluting ribbed header to entrances.
- Alterations to balcony base colouring on front elevation.
- Introduction of folded screen instead of hit and miss brick for bicycle stores.
- Greater consideration to signage strategy.



*Figure 9 – CGI showing latest 21st March 2024 amendments.*

### **Site and Surroundings**

5.10 The site lies on the south eastern side of Whytecliffe Road South, approximately 30m north east of Purley Train Station. The site is made up of two distinctive parts; a car park which primarily serves Purley Railway station, and a series of residential terrace properties. The site has an area of 0.75 hectares.



*Figure 10 – Site and Context*

5.11 The residential properties are located at the southwestern end of the site and made up of two property types. At the closest point to the train station there are a terrace of four two storey houses (nos. 26 to 32), which on their front elevation feature distinctive gabled red bricked dormer windows. Immediately adjoining to the north east are two sets of terraced properties, each consisting of five houses (nos. 34 to 52). These properties feature two storey square gabled bay windows with tile hung detailing. All the aforementioned properties are set above the street level, with the majority having off street parking within their front garden areas and a series of retaining walls. These properties have good sized rear gardens that extend approximately half the depth of the site. A series of trees are located along the rear boundary of these properties.



*Figure 11 – Photos of the terraced properties to be demolished*

5.12 At the north eastern end of the side is the Network Rail station car park for Purley Train Station. This consists of a main central square car park fronting Whytecliffe Road South, with two arms to the rear. One of the arms extends along the south western boundary next to the railway line, behind the rear of nos. 26 to 52, with the other arm extending to the north east next to the railway

line, behind Purley Social Club. The car park has one vehicular entrance from Whytecliffe Road South, located at the northern western end, with a pedestrian entrance to the south western end. To the front of the car park are a series of fifteen mature Lime trees.

5.13 The site has a PTAL (Public Transport Accessibility Rating) rating of 5, is located within an area at risk of surface water and critical drainage flooding and within an area where there is potential for groundwater flooding to occur at surface.

5.14 The Purley District Centre site lies on the opposite side of Whytecliffe Road South, with primary shopping area and retails frontages beyond.

5.15 The site lies within the Place Specific Policy Area: DM42, Purley. The car park portion of the site is allocated (no.61) in the Croydon Local Plan (2018) as follows:

61: Car park, 54-58 Whytecliffe Road South

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Purley	CR8 2AW	0.46ha	Car Park	Urban	High	Institutions with associated grounds; Mixed type flats; Planned estates of semi detached houses; Terraced houses and cottages; Transport Nodes	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Residential use with retention of car parking spaces		The site will help to meet the need for homes and potential for public parking in the borough after 2026. A Transport Assessment will be required of redevelopment proposals for the site to consider possible impacts on local streets in the vicinity of Purley Railway station arising from any reduction in parking.			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	21 to 119

5.16 Directly opposite the site is a multi-storey car park, which is an allocated site (no.30) within the Croydon Local Plan (2018) as follows:

30: Purley Leisure Centre, car park and former Sainsbury's Supermarket, High Street

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Purley	CR8 2AA	0.66ha	Swimming pool, multi-storey car park and former supermarket	Urban	High	Large buildings in an urban setting; Mixed type flats; Terraced houses and cottages; Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Mixed use redevelopment incorporating public car park, new leisure facilities, including a swimming pool, and other community facilities, healthcare facility, creative and cultural industries enterprise centre, retail or residential accommodation.		The community use of the site is protected by Policy SP5 of the Croydon Local Plan 2018. A commitment to deliver a creative and cultural industries enterprise centre in Purley District Centre is set out in Croydon Local Plan 2018. As it is in the Primary Shopping Area retail is an acceptable use. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities.			2021 - 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	30 to 171

### *Relevant Planning History*

5.17 Relevant planning history for this and adjoining sites is as follows:

26 to 52 Whytecliffe Road South (terraced houses only)

- 5.18 There is a current planning application reference 19/03142/FUL that is under consideration for the 'Demolition of existing terraced houses and erection of part 6/part 7/part 8/part 9 development to provided 106 residential units, together with five wheelchair parking spaces and landscaping.'



Figure 12 – CGIs and plan of current planning application at no.26 to 52 WRS

64 to 74 Whytecliffe Road North (to north)

- 5.19 Planning permission reference 19/02678/FUL was granted on the 28/08/2020 for the 'Demolition of the existing three pairs of semi-detached houses and the erection of a part 3/part 5/part 6 storey building with part basement to provide 39 residential units, together with associated terraces, disabled car parking spaces, amenity space and landscaping'. This consent is currently being implemented on site.



Figure 13 – CGIs and plan of approved planning application at no.64 to 74 WRN

53 to 61 Whytecliffe Road South (opposite)

- 5.20 Planning permission reference 05/00914/P was granted at appeal for the 'Demolition of all buildings except No 53; erection of 1 two/three storey building and 1 six storey building comprising 25 one bedroom, 40 two bedroom and 5 three bedroom flats; alterations and extension to no 53 and use of ground floor for commercial purposes with 1 one bedroom and 1 two bedroom flats over; formation of vehicular access and provision of associated car parking and cycle parking'. Implemented and occupied.

58 Whytecliffe Road South (site immediately to north)

- 5.21 Planning permission reference 15/04252/P was granted on the 12/11/2015 for the 'Use of front of ground floor as a community centre.'
- 5.22 Planning permission reference 18/02340/FUL was granted on the 29/08/2018 for the 'Demolition of the existing single storey office building (Class B1) and the erection of a four/five storey building providing 9 residential units (Class C3) comprising 7 x two bed units and 2 x one bed units, including private amenity space for each unit, refuse and recycling storage and secure cycle storage.' A non-material amendment reference 19/02829/NMA was approved on the 26/07/2019. Implemented.

63 Whytecliffe Road South (opposite)

- 5.23 Planning application reference 19/02109/FUL was granted on the 14/05/20 for the 'Demolition of existing mosque and erection of mixed use mosque

development comprising public worship spaces, function areas and one floor of residential use (3 x studio flats) with associated landscaping.' Implemented.

67 Whytecliffe Road South (opposite)

- 5.24 Prior Approval application reference 17/06410/GPDO was approved on the 06/02/2018 for the 'Conversion of existing B1 (a) office to form two 2 bedroom and two studio flats'.
- 5.25 Prior Approval application reference 19/01859/GPDO was approved for the 'Change of use from existing B1 offices to C3 residential use. Provision of 3 flats.'

50 High Street (Leisure Centre, Car Park and Former Sainsbury Car Park)

- 5.26 Pre-application discussion (reference 23/00486/PRE) for 'Demolition of the existing buildings and erection of 4 buildings of 5-12 storeys to provide a leisure centre, commercial unit, approximately 246 age-restricted and care units (Use Classes C2 and C3) with associated facilities, public square and route through the site, and car park'. The scheme was presented to Committee as a Developer Presentation in August 2023.
- 5.27 A current planning application has recently been validated reference 24/00775/FUL for 'Demolition of the existing buildings and erection of buildings of 5 to 12 storeys to provide a leisure centre (Use Class F2), commercial unit (Use Class E), an Integrated Retirement Community comprising a mix of Specialist Older Persons Housing and Care Accommodation for older people (Use Classes C2 and C3), car parking, landscaping, and associated works.'

## **6.0 CONSULTATION RESPONSE**

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

### **Greater London Authority (Statutory Consultee)**

- 6.2 A summary of stage one response and follow up correspondence is set out below:

Principle

GLA welcome the residential led intensification of the site, noting its accessible town centre location, and that it is currently underutilised.

*OFFICER COMMENT: noted and supported.*

Housing, Affordable Housing, Residential Quality

There is no strategic concern in regard to housing mix. Confirmation that the development's affordable housing offer is not fast track eligible. The GLA initially raised concern over the quantum of play space, but this was misunderstanding. They raised concerns over north facing units.

*Officer response: The GLA have subsequently confirmed that they are satisfied that the affordable housing offer is the maximum reasonable. The north facing*

*units have been confirmed as not technically north facing, and justification has been provided in the report for the extent of single aspect units.*

### Urban Design

Support the strong street edge the scheme provides, especially given current absence/lack of consistency at present. Welcome the attention given to articulation and how this creates a varied massing and rhythm along the street. They support the generous pathway created by the development, but felt the design, landscaping and function of the public space should be given further consideration. There were concerns regarding the length of inactive frontage at the western end of the development.

They note that the building meets the definition of a tall building, and that place-specific Local Plan Policy DM42.1 supports development that complements the predominant heights of 3 to 8 storeys and a new development of up to 16 storeys and considers that the area *“has a varied topography which presents opportunities for tall buildings”*. They state the following *“Whilst it is understood that the envisaged 16 storey building has already been approved at another site, Local Plan Policy DM42.1 clearly identifies this area as suitable for taller buildings, and the proposal for a 9-storey building is therefore considered to comply with London Plan Policy D9(B3).”*

They consider that in terms of visual impacts, the proposed massing responds positively to the surrounding context. The introduction of a significant set back on the 3 upper storeys allows for a good transition with adjacent buildings, and that it would generally have an acceptable impact on views from different distances. They welcome that the material palette responds to the area's character.

*Officer response: The support for the scheme is noted. Officers have worked with the applicant to improve the design and create more activation at ground floor level by increasing extent of glazing, introduction of more detailing, creation of new cycle hub and enlarging extent of public art area.*

### Heritage

They consider that the change in townscape and setting would not be so significant as to affect the appreciation and significance of the Grade II listed Russel Hill School or locally listed buildings. It was also considered that the development would not cause harm to the heritage significance of the Webb Estate Conservation Area.

*Officer response: This is noted.*

### Transport

The GLA required further consideration by the applicant on mode share, and trip generation of the existing station car park. They requested further information on bus stop relocation.).

They support that the residential element is car free, with exception of disabled parking provision, but the development should be subject to a permit free agreement, and appropriate contribution toward reviewing and implementing local parking controls. They state that the initially proposed 15 disabled

residential parking spaces, that amounts to 6% of total units, should be reduced to 3%.

They requested an increase in cycle parking space by 2 and modifications made to the design. They request a robust assessment of delivery and servicing demands, and that a full delivery and servicing plan be secured by condition. A construction logistics plan is also required to be secured by condition.

*Officer response: Additional information has been provided where requested. Modal share information will be collected more accurately through the travel plan, secured through the legal agreement. The relocation of the bus stop has been explored further by TfL, applicant and LPA, and agreed to be unfeasible. However, upgrading of the existing stand to include a shelter and countdown timer is recommended to be secured through the legal agreement. The level of disabled parking has been reduced in line with TfL's comments. Cycle parking provision is in line with policy. Additional delivery and servicing information has been provided, with final delivery and servicing strategy recommended to be secured by condition. A construction logistics plan is recommended to be secured via condition.*

#### Station Car Park

The GLA welcomed the reduction in station car parking (from circa 195 currently on site (please note the actual number is 166 as later clarified by the applicant post GLA's stage one response) to 165 when application was submitted) but was concerned that the provision of such parking would not achieve a strategic modal shift in line with London Plan (2021) policy T1 or support the delivery of the Mayor's Healthy Street approach in line with policy T2. London Plan (2021) states that car parking should be dealt with on a case-by-case basis, giving regard to PTAL (current and future), public transport, walking and cycling connectivity. They felt that given the site had a PTAL of 5, located within Purley Town Centre and proximity to a constrained part of the TLRN, that the development should be fully car free, including commuter parking.

*Officer response: Following on submission of further evidence from the applicant and engagement, and further reduction in car parking to 125 spaces, the GLA's current position is understood to be that some station car parking may be acceptable, but consider the quantum, in line with TfL's view, to be excessive. They note that whilst they consider the parking provision contrary to policy and that this weighs against the scheme in the overall planning balance, there are other aspects of the scheme that will weigh in its favour, such as additional housing and affordable housing. The overall planning balance will be/can only accurately considered at stage 2.*

#### Sustainability

In recent comments the GLA have raised significant concern over the incorporation of comfort cooling. Concerns are raised over the high level nature of the Whole Life Carbon Assessment submitted. Further clarifications on heat networks, extent of PV panels and whether this has been maximised and on ASHPs. There are also additional technical comments on Circular Economy.

*Officer response: Comfort cooling has been removed from the proposal. Additional information has been supplied to the GLA to address their concerns.*



### Other Matters

- Note proximity to railway line and aggregates facility, and that scheme needs to be considered/designed in context of agent of change principle.
- Comments on fire safety statement, and amendments/clarifications needed. Subsequently confirmed amendments have addressed concerns.
- Need further details on equality impacts from station car park and initially proposed bus stop changes.
- Request that UGF be secured by condition.
- Required further development of SUDS strategy.
- Community space should be secured by legal agreement.

*Officer response: Officers have worked with the applicant and the agent for the aggregates site to ensure that the development would not impact the operation of the aggregates site and to ensure an acceptable standard of residential accommodation. Concerns on fire safety have been addressed. An equality impact assessment has been provided by the applicant that has satisfied the GLA's concerns. UGF recommended to be secured via condition. The SUDS strategy has been revised, addressing the GLA's concerns. Community space is recommended to be secured through the legal agreement.*

### GLA Viability

GLA viability team have confirmed that the affordable housing offer seems the maximum viable but wish for reasonable basis for reviews to be agreed.

*Officer response: This is noted. Early and late-stage reviews are being secured through the legal agreement, the wording of which will be agreed between the applicant, GLA and LPA.*

### **Transport for London (TfL) (Statutory Consultee)**

6.3 TfL have raised an objection and make the following comments:

- The provision of 144 parking spaces (125 commuter car parking spaces, 2 car club parking spaces, 17 motorcycle parking spaces) is not a large enough reduction in parking spaces and does not go far enough to install sustainable and active travel patterns in line with London Plan and Mayor's Transport Strategy policies, that seeks for 80% per centre of all journeys to be made by walking, cycling and public transport. The expectation is that car free development should be the starting point. They challenge the applicant's interpretation of the travel data sent.
- Welcome the suggested parking review mechanism but should not be seen as alternative to further reducing parking provision at the site. Concern that the mechanism is unlikely to be successful in reducing parking numbers due to Network Rail's consultation procedure.
- 5 percent of parking in the commuter car park should be designated disabled parking and 5 percent enlarged bays.
- Level of cycle parking acceptable in regard to residential. A cycle space for community use should be provided. Minor amendment to the cycle hub design suggested.

- Unclear if the applicant is providing segregated cycle lane to station entrances. Contribution towards upgrading bus stand should be secured.
- Construction Logistic Plan, delivery and servicing plan, a parking design and management plan and Travel Plan should be secured via condition. Travel plan should be split into two, one for residential and one for commercial.

*Officer response: Whilst a further reduction in station parking numbers would undoubtedly further increase the use of sustainable and active travel, ultimately the site allocation allows for the retention of the car park, the proposal would result in improvement over the current status quo and the scheme delivers a number of benefits, notably a cycle hub, that would support active sustainable travel both to the station, but also be of benefit to Purley more generally. On balance the level of station parking is acceptable. The concerns of the review mechanism are noted, but it is still beneficial to have one and those limitations are largely beyond the applicant's control. 5% (7) blue badge parking spaces are being provided in the commuter car park, but no enlarged spaces are proposed. It is recommended that this be explored in the future if a reduction in car parking is achieved through the review mechanism. Further design details of the cycle hub are recommended to be secured through the legal agreement. The segregated cycle lane does not form part of the application, but something understood that Network Rail are exploring separately. It is not considered necessary as part of the application, given that residents of the development would not access the station by bike given the proximity. A contribution to the bus stand is recommended to be secured through the legal agreement. A combination of conditions and legal agreement are recommended to secure the documents requested.*

#### **Lead Local Flood Authority (LLFA) (Statutory Consultee)**

- 6.4 No objection and the submitted drainage strategy is acceptable.  
*Officer response: Condition is recommended to ensure implementation of submitted drainage strategy.*

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

- 6.5 They advise that the development could cause harm to the archaeological remains and field evaluation is needed to determine appropriate mitigation. The archaeological interest can be appropriately safeguarded through condition. An informative has also been recommended.  
*Officer response: Condition and informative are recommended.*

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

- 6.6 No objection and have recommended informative regarding waste water assets.  
*Officer response: Informative is recommended.*

#### **Network Rail (Statutory Consultee)**

6.7 No comment received.

**Metropolitan Police/Designing Out Crime Officer**

6.8 No objection subject to condition to achieve secure by design accreditation.

**London Fire Brigade**

6.9 No response to date.

**Building Control**

6.10 Advise that the proposal appears to be satisfactory. Positions on operation of evacuation lifts and protection of waiting areas is reasoned and reasonable that correlates with stairs and corridor capabilities. In terms of fire safety and evacuation lift they are satisfied that policy objectives are achieved, that a suitably qualified individual has written the statement, and that the proposal is capable of accommodating changes that may emanate from Building Regulations and Fire Service consultation without significant change. Some additional details required would be expected to be available once detail design commences.

*Officer response: Condition recommended to secure revised fire statement.*

**7.0 LOCAL REPRESENTATION**

7.1 A total of 133 neighbouring properties were notified about the application and invited to comment by the way of letter, site notices were erected and a notice published in the press. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

Individual responses: 224    Objections: 103    Support: 109

1    Petition containing 120 expressions of support

7.2 The following issues were raised in representations that are material to the determination of the application, which are addressed in substance in the next section of this report:

<b>Summary of Objectors Concerns</b>	<b>Officer's Response</b>
Not in keeping with the area, impact on views and development is too high.	The proposed development is a contextually responsive modern contemporary design that appropriately draws on features of area whilst also working in a complementary manner with the evolving context. The proposed development would improve the appearance of the site and surrounding area and has a well-considered height

	that would not have an unacceptable impact on views.
Concern over loss of railway cottages.	The terrace properties are not subject to any form of protection, nor are they considered to be of merit necessary to justify protection. These properties could be demolished under permitted development rights, in which their appearance and history would not be a relevant consideration. Notwithstanding this, their demolition is considered justified, given the substantial benefits that the development provides, and as way of optimising the capacity of the site.
Loss of family homes.	The proposed development would increase the number of family homes available.
Poor quality of accommodation and poor layouts.	The provide development would provide high standard of residential accommodation with all homes meeting internal and external space standards, would be well lit and have access to high quality communal amenity space that includes play provision.
Too many flats in Purley.	Flats provide an important source of homes. This site is a suitable location for flats, and the provision of flats is needed in order to optimise the potential of site and ensure the delivery of affordable housing.
Loss of privacy.	The proposed development provides good separation distances to neighbouring properties such that their privacy would not be significantly harmed.
Impact on light to neighbouring properties.	The proposed development would cause a significant loss of light to neighbouring properties. However, the cause of this is not from overdevelopment of the site, but from design and layout of the impacted properties. Any impact is largely unavoidable if the site is to be meaningfully developed and the benefits of the site optimised, which includes the delivery of much needed affordable homes.
Wind impact.	The submitted desktop assessment demonstrates that wind conditions around the development would be appropriate.
Traffic generation.	The proposed development would not generate significant level of trips, and likely to decrease, due to the residential element being car free (except disabled parking provision), and there being a reduction in the size of the station car park.
Lack of parking for residential development.	The provision of car free development in this highly accessible and well-connected location is supported and in line with policy. It supports several sustainable and active healthy lifestyle objectives that are set out in more detail within the report. A contribution to consultation and potential implementation of expanded CPZ has also been

	secured, that could help control parking stress in the area in the future.
Concern for loss of station car parking.	The proposed quantum of station car parking is considered to strike an appropriate balance between serving the needs of the area, whilst encouraging and promoting sustainable modes of transport, that have wider sustainable and health benefits. It should be noted that TFL/GLA position is that they wish to see a further reduction.
Impact on station car parking during construction.	Network Rail are looking at a number of strategies to mitigate the impact of the development during construction. A condition is recommended to ensure this is appropriately considered.
Impact on aggregates site operation.	Engagement with the aggregates site has been undertaken, who are generally satisfied, but have placed a holding objection that would be removed subject to an agreement of an appropriately wording of condition. A condition is recommended that in officers view meets their requirements. Officers have sent the wording of the condition to the aggregates site and are awaiting their response.
Developer needs to do more in terms of cycling.	Further improvements have been made since the objector's comments. A new cycle hub is proposed, and improvements have been made to cycle parking provision design. In addition, a significant financial contribution will be secured through the legal agreement that will go towards sustainable initiatives, a number of which benefit/improve cycling infrastructure.
Impact on flooding.	The submitted drainage strategy would result in a 92% betterment over the existing site performance in terms of surface water flooding.
Concern over boilers.	Boilers are not proposed as part of the development. The development will be heated through sustainable methods such as air source heat pumps and PV panels.
Lack of trees.	The development will retain trees of most visual importance and provide new trees along the frontage. There would be a net increase in the number of trees post development.
Money from this development should be used to fund Purley Pools.	It is considered that direct funding would not be reasonable. The impact of the development on local infrastructure and facilities would however be mitigated through the collection of CIL and Section 106 (where relevant). CIL in accordance with national legislation is collected borough wide for assignment to infrastructure to mitigate, in part, the impact of the Local Plan 2018.
Pollution impacts including air quality.	By locating homes in a highly sustainable location with low car provision would contribute to developing an environmentally sustainable development.

Insufficient capacity in the water network.	Thames Water have been consulted and have confirmed they have no concerns regarding this.
Impact of development on services such as schools, doctors, dentists.	The proposed development would require CIL contribution that would support the provision of services in the area.
Impact of development due to construction.	Conditions are recommended to ensure that this impact is mitigated as far as reasonably possible.

7.3 Councillor Badsha Quadir objected on the following grounds:

- Development is taller than agreed.
- Lack of car parking for residents of development.
- Poor quality of residential accommodation and lack of amenity space, with poor outlook of traffic and train station.

7.4 Councillor Holly Ramsey objected on the following grounds:

- Loss of family homes.
- Overdevelopment and lack of amenity space.
- Cumulative impact.
- Not in keeping with the area.
- Obtrusive by design.
- Vehicular access.
- Overlooking and privacy.
- Loss of car parking and lack of car parking spaces.

7.5 There are 109 letters of support; the comments are summarised as follows:

- Good for local businesses.
- More homes are needed to combat housing crisis. This will help young people.
- More affordable housing needs to be built.
- Will help to reduce rent in the area.
- Support the new public areas that will improve the look and feel of Purley.
- Support for environmental credentials of the development.

7.6 One petition was received, containing 120 expressions of support. The comments are similar to those received in direct letters of support summarised above.

## **8.0 RELEVANT PLANNING POLICIES AND GUIDANCE**

8.1 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 1.

### *National Guidance*

8.2 The National Planning Policy Framework (NPPF (2023)) and online Planning Practice Guidance (PPG), as well as the National Design Guide (2019) are material considerations which set out the Government's priorities for planning and a presumption in favour of sustainable development.

8.3 The following NPPF (2023) key issues are in particular relevant to this case:

- Delivering a sufficient supply of homes
- 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

#### *Development Plan*

- 8.4 The Development Plan comprises the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). The relevant Development Plan policies are in Appendix 1.

#### *Supplementary Planning Document/Guidance*

- 8.5 The relevant SPGs and/or SPDs are listed in Appendix 1.

#### *Emerging Development Plan Review*

- 8.6 A partial review of Croydon's Local Plan commenced in 2019. It went through the first stage of review and associated consultation known as regulation 18 between November 2019 and January 2022, and the second stage of review and associated consultation, known as regulation 19, between January 2022 and February 2022. As part of regulation 19 consultation, a Draft Croydon Local Plan Revised (Regulation 19) (December 2021) was published. This version of Draft Croydon Local Plan carries very limited weight. The draft Croydon Local Plan is currently being reviewed, and it is expected to go through another round of public consultation, prior to the submission to Secretary of State and public examination.

## **9.0 MATERIAL PLANNING CONSIDERATIONS**

- 9.1 The main planning issues raised by the application that the Planning Committee are required to consider are:

1. Principle of development.
2. Affordable housing, housing mix and quality of residential accommodation.
3. Impact on the appearance of the site, surrounding area and heritage.
4. Impact on neighbouring properties' living conditions.
5. Transport, parking and highways.
6. Trees and biodiversity.
7. Sustainable design.
8. Impact on surrounding environment.
9. Other planning issues.

### **Principle of development**

#### *Residential*

- 9.1 The London Plan (2021) sets a minimum ten year target for the borough of 20,790 new homes over the period of 2019-2029. The Croydon Local Plan (2018) sets a minimum twenty year target of 32,890 new homes over the period of 2016 to 2036, with 6,970 homes of that being delivered on allocated sites that

lie outside of the Croydon Opportunity Area and 10,060 homes being delivered across the borough on windfall sites.

- 9.2 The principle of a form of residential development is supported.
- 9.3 Only the station car park part of the site is allocated (approx. 0.49 hectares), with the remaining residential terrace properties (approx. 0.26 hectares) not forming part of the site allocation. There are approximately 138 homes proposed on the allocated part of the site, which exceeds the allocation of 21 to 119 homes set out in Croydon Local Plan (2018).
- 9.4 The stated allocated number of homes set out in the Croydon Local Plan (2018) should not be applied mechanistically and is indicative. The range provided in allocations is indicative. The actual number of homes which may come forward on an allocated site will be based on, amongst other factors, the design and viability of a scheme. The allocated number of homes was arrived at using a methodology based on the former London Plan density matrix. The current London Plan (2021) requires a new design led site optimisation approach to arrive at an allocated number. As set out in further detail later in the report, the mass/design placed forward is in line with that design led site optimisation approach, and the number of homes therefore delivered is appropriate.
- 9.5 The provision of approximately 100 homes on an unallocated part of the site would be classed as windfall housing, contributing to the 10,060 homes windfall target, as well as the borough's wider housing targets.
- 9.6 London Plan (2021) Policy GG2 'Making the best use of land' states that to create successful sustainable mixed-use places that make the best use of the land, those involved in planning and development must enable the development of brownfield land particularly on sites within and on the edge of town centres, and which is surplus. London Plan (2021) Policy H1 states that boroughs should optimise the potential for housing delivery on brownfield sites which have a high PTAL (3 to 6), or which are located within 800m distance of station, and/or which are low density retail parks.
- 9.7 The site has the optimum characteristics outlined above, with its PTAL rating of 5 (in line with H1) that means it has very good access to public transport including being only a short walk to the train station, with very good access to local shops and services; and near the edge of Purley District Centre. The provision of 238 homes on site with these substantial positives/benefits, whilst also delivering a site allocation, including as part of that making a notable contribution to achievement of the borough's housing targets, is a significant benefit and positive in the application's favour.

#### *Community Use*

- 9.8 Policy DM19 of the Croydon Local Plan (2018) states that the Council will support applications for community uses where they:
  - a. Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion;



- b. Comply with the criteria for D1 class uses in industrial locations set out in Table 5.1;
  - c. Are accessible to local shopping facilities, healthcare, other community services and public transport or provides a community use in a location and of a type that is designed to meet the needs of a particular client group; and
  - d. Are for a use that is a town centre use, as defined by the National Planning Policy Framework, are located within Croydon Metropolitan Centre or a District or Local Centre, have no more than 280sqm of floor space (net) and are in the vicinity of a Neighbourhood Centre, or are a change of use of an existing unit in a Shopping Parade.
- 9.9 The proposed community use is located outside of the district centre, and therefore contrary to DM19 (d). Members requested a community facility be provided within the development at pre-application committee to help support residents within the development, and as it was felt despite being strictly contrary to policy, given the District Centre location is on the opposite side of the road it would form a valuable asset to the area. The proposed community use has a tight remit, being available to local community groups and charities for 20 hours per week free of charge for meetings and other associated activities. Outside of this time, the space will form ancillary communal space for residents, to meet and work, thus improving the quality/experience of residents and encouraging interaction across the tenures that facilitates mixed and balanced communities. The very good PTAL rating of the site also ensures that it would benefit from many of the sustainable and accessibility advantages that district centre locations generally benefit from. Given the very specific and defined nature of the community use, it is a benefit, that would not detract from the vitality and function of the district centre. Nor is it considered to impact the community use located opposite the site within the lower ground floor level of 51 to 53 Whytecliffe Road South. The provision of such a community use weighs positively in the application's favour.
- 9.10 The community space is located within an appropriate location at ground floor level, on the main pedestrian route to the station, that would give it visibility, and help create an active frontage. It is appropriately sized (148 sq.m), such that it would be a local benefit, but not so large that it could impact the vitality of the district centre. The space itself is inherently flexible due to its regular shape and access to natural light.
- 9.11 A basic community use plan has been submitted. However, to ensure that the benefits are realised as intended, it requires further development. Further consideration is required in terms of strategy to inform/engage with local charities and groups (as well as residents), to advertise and develop knowledge/interest in the space/facilities, details on how a broad cross section of the community will benefit/targeted, how the space will be managed/bookable for both residents and community groups/charities, and how the space will be fitted out to meet the needs of charities/ local groups and residents. These additional details are recommended to be secured via legal agreement. The community use also ensures some public access to the building, which is in accordance with London Plan's (2021) tall building policy D9 part D.

### *Commuter car parking*

- 9.12 As a matter of land use principle, the provision of replacement car park is not contentious given there is already an existing larger car park on the site, and the allocation requires the retention of the car park. The appropriateness of the reduction in car park spaces, is considered in greater depth within the Transport, Parking and Highways section of the report.

## **Affordable housing, housing mix and quality of accommodation**

### *Affordable Housing*

- 9.13 The Croydon Local Plan (2018) requires the council to negotiate up to 50% affordable housing (subject to viability), with a minimum of 30% on a habitable room basis. The Croydon Local Plan (2018) requires this to be sought at a 60:40 split between affordable rented homes and intermediate homes. The London Plan (2021) sets a strategic target of 50% but allows a lower provision to be provided dependent on whether it meets/exceeds certain thresholds (known as Fast Track route), or when it has been viability tested. It should be noted as the London Plan (2021) was adopted after the Croydon Local Plan (2018), that where there is a policy difference, then the most recently adopted policy should take precedent.
- 9.14 Policy H6 of the London Plan (2021) requires developments to provide 30% as low cost rented homes, either as London Affordable Rent or Social rent, allocated according to need and for Londoners on low incomes, 30% as intermediate products which includes London Living Rent and London Shared Ownership, with the remaining 40% to be determined by the borough.
- 9.15 The proposed development would provide 31.7% affordable housing by habitable room, which amounts to 74 homes. The tenure splits would be 65.4% London Affordable Rent to 34.6% shared ownership by habitable room, which translates to 45 London Affordable Rent homes and 29 shared ownership homes. Shared ownership homes are contained in blocks B and C, with London Affordable Rent homes contained in block C. Private units are found in blocks A, B, D and E. The tenure split is broadly in accordance with policies SP2.4 of the Croydon Local Plan (2018) and H6 of the London Plan (2021).
- 9.16 London Plan (2021) Policy H5 states that to be eligible for the 'Fast Track route', a minimum provision of 50% affordable housing that utilise public land, with 35% on other sites, is required. In this instance as the site is made up of both public land (station car park) and private land (terrace houses), a blended rate based on site area is adopted. This results in a target figure of 45% affordable housing offer being required to be eligible for the 'Fast Track route'. As the development with its 31.7% affordable housing offer, is below this target figure of 45%, it is required to be subject to a viability appraisal.
- 9.17 A viability appraisal was submitted at both pre-application and application stages, which has been scrutinised independently by Savills. The independent viability assessor has confirmed that there would be a significant viability deficit, and therefore it would not be viable to provide an increased amount of affordable housing beyond the offer of 31.7%.

9.18 The proposed affordable housing offer is acceptable, as no additional affordable housing could be viably provided. Early and late-stage review mechanisms are recommended to be secured through the S.106 legal agreement, to capture any changes (for example increase in house prices), which may result in increased affordable housing provision and/or contribution. The early stage review would be triggered if works on site had not reached an agreed point within 24 months of permission being granted (usually works above first floor level) and the late stage triggered at the point of 75% of the homes are sold or let.

#### *Housing Mix*

9.19 Croydon Local Plan (2018) policy SP2.3 states the Council will seek to ensure that a choice of homes is available in the borough, which will address the borough's need for homes of different sizes. Croydon Local Plan (2018) policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Croydon Local Plan (2018) policy DM1 of the Croydon Local Plan (2018) requires major developments in an urban setting with a PTAL of 4, 5, 6a or 6b to have 40% of the homes as three bedroom or larger. The site is considered by officers to be urban as the surrounding area is predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and buildings of 2 to 4 storeys, located adjacent to Purley District Centre.

9.20 25% (60) of the homes would be three beds or greater, thereby not meeting either the strategic or site-specific major application policy standard. There is an exception within policy DM 1.1, where an alternative mix can be justified. These states (a) *where there is agreement with the associated affordable housing provider that three or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal.*

9.21 Seventy-four homes make up the affordable element of the proposal; eleven of these homes are three beds, which amounts to 14.9% of the affordable housing element being three beds. The applicant has provided a letter from Redloft. Redloft are not a registered provider, but are a housing, regeneration and development practice that specialise in affordable housing providing a range of services for many registered providers. They do not meet the requirements of policy, which only allows agreement between the LPA and registered provider to justify a lower percentage of three bed units making up the affordable housing offer provision. The letter sets out generic challenges that RPs face in the current market, in essence that an increase in the provision of three bedroom properties would attract lower offer prices for registered providers, which in turn would impact viability and reduced affordable housing provision. This in turn would make the scheme less attractive to RPs as larger unit number schemes are more efficient from a management and service charge perspective. The letter can be given limited weight and provides general background, but its usefulness is reduced as it is not from an RP, does not provide any viability testing to establish what impact it would have on viability and does not address the issue of need, especially given that the viability circumstances set out are standard. The proposed three bed offer in regard to affordable housing element is therefore concluded not to be in accordance with policy.

- 9.22 In regard to the private element, 49 of the homes are three beds, which amounts to 30%. Whilst the private provision percentage of three beds is in line with strategic policy, it falls 10% short of the site-specific target. Whilst noting there is no provision within policy for viability to provide an exception, officers acknowledge the significant viability deficit, and that the provision of further three bed homes (which achieve a lower price per square foot compared to one and two beds), would further decrease viability. Requiring a greater number of three beds to be provided could lead to a reduced affordable housing offer.
- 9.23 In conclusion, both the private and affordable housing three bed offering is below policy expectations. How this shortfall weighs in the overall planning balance, will be returned to in the conclusion section at the end of this report. However, in simplest terms, the affordable housing offer, which is offered and maintained despite the substantial viability deficit, technically exceeds the quantum required by policy. The additional benefits from having an affordable housing offer above policy requirements, outweighs the benefits that would be provided by providing additional three bed units.
- 9.24 Policy DM1.2 seeks to prevent the loss of small family homes by restricting the net loss of three bed homes (as originally built) and the loss of homes that have a floor area less than 130 sq.m. The existing homes at 34 to 52 Whytecliffe Road South are likely to originally have been three bed units with two main bedrooms, and a box room. Nos.26 to 32 Whytecliffe Road South are originally likely to have been two beds. All properties are likely to be under 130sq.m when originally built. There would be a net gain (+50 increase) in the number of three beds, whilst also a substantial uplift in properties smaller than 130sq.m. The proposal complies with Croydon Local Plan (2018) policy DM1.2.

#### *Quality of Residential Accommodation*

- 9.25 All of the proposed residential homes meet, and many exceed minimum floorspace standards set out in Policy D6 the London Plan (2021). All homes would have private amenity space that meets or exceeds Croydon Local Plan (2018) and London Plan (2021) standards.
- 9.26 London Plan (2021) states that developments should maximise the provision of dual aspect units, with single aspect units only provided where it considered to be a more appropriate design solution in order to optimising capacity, and where it can be demonstrated they will have adequate passive ventilation, daylight, privacy and avoid overheating.
- 9.27 130 (54.6%) of the units are single aspect as defined in Mayor of London's Housing Design Standards LPG. None of these units are defined as being north facing. 95 of the single aspect units, although technically single aspect under the LPG guidance, do benefit from a limited secondary aspect. Such limited secondary aspect openings do not meet the definition of being dual aspect set out in the LPG guidance due to angle which they face (i.e. not on a perpendicular plane) or location within the unit (not deep enough within floorplate); officers consider these to be 'enhanced' aspect units. This results in 35 (14.7%) single aspect, 95 (39.9%) enhanced aspect and 108 (45.4%) dual aspect. As set out in paragraphs 9.76 to 9.78, the applicant has followed an appropriate design process as advocated in the 'Optimising Site Capacity: A

Design-Led Approach' LPG that has led to form and density of development proposed. The applicant has submitted a single aspect unit audit, that considers each single aspect unit and sets out justification for them.

- 9.28 Requiring a greater proportion of dual aspect units that meet the guidance would significantly reduce the number of homes that would be delivered (including corresponding number of affordable homes), likely reduce viability, which could decrease the overall percentage of affordable housing and potentially prevent the scheme being delivered. It could compromise the design quality of the scheme, for example the desire to present a coherent and defined street edge, as alternative more broken up individual building forms would likely need to be adopted.
- 9.29 Deck access is often used as way of creating dual aspect units on mansion block typologies. Page 47 of the applicant's design and access statement has explored the consequences of implementing such a form. It would result in an estimated loss of 55 homes, a 23% reduction. There would still be some single aspect units due to stair cores (at least 24 units). Officers are satisfied that there is sufficient justification for the number of single aspect units. Notwithstanding this, when taken the residential units are considered as whole, they still deliver a good standard of residential accommodation.
- 9.30 The applicant has submitted a sunlight and daylight report that has been carried out in accordance with the latest BRE guidance. In terms of internal illuminance, there is a 94% compliance rate if the alternative 150 Lux value is adopted for shared living/kitchen/dining rooms, as allowed for under BRE guidance. Where values are not met, the rooms are generally located within corners between the main bulk and finger elements, and/or at lower levels which are generally harder to light. The quality of light that these spaces receive is an acceptable compromise to optimising the potential of the site and ensuring its delivery, as well as presenting a coherent overall design. The applicant also states that where compliance is not achieved, the room itself is served by external balcony or winter garden that are generally well-lit. Residents perception of the space will be improved, and any deficit would be offset by the provision of a well-lit amenity space.
- 9.31 In terms of sunlight, 92% of dwellings within the development would have a window that would receive direct sunlight for hours in excess of BRE standards. Given the orientation of site and need to respect existing townscape/street pattern, as well as the site's urban location, this is very high and significant positive in the application's favour in terms of unit quality.
- 9.32 A noise impact assessment was submitted, considering internal noise limits within the homes. Facades facing Brighton Mainline and the aggregates site, and those which face directly onto street on Whytecliffe Road South, have been designed to contain high acoustic specification. Some units would need to be supported by cooling (through use of cooling trim) to allow them to close their windows in order to block out noise and not overheat. This strategy ensures good noise environments within the homes. The strategy also ensures compliance with the agent of change principle, that includes not compromising

the operation of the aggregates site and railway line. The aggregates site have been consulted in connection with the application and raise a holding objection, which they would remove subject to condition. A condition has been recommended that in officer's view meets the requirements of the representation received from the aggregates site. The relevant condition wording has been sent to the agent of the aggregates site, and officers await their response.

- 9.33 All habitable rooms would have good levels of privacy. This is because they would be well separated from neighbouring properties and there are reasonable separation distances between the blocks themselves.
- 9.34 Paragraph 6.56 outline how the London Housing Design Guide identified that 'in the past, planning guidance for privacy has been concerned with achieving a visual separation between dwellings by setting a minimum distance of 18-21m between facing homes'. It says that 'these are useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaced and housing types in the city and can sometimes unnecessarily restrict density'.
- 9.35 In terms of privacy relationship with neighbours, there is a minimum 18m separation distance to neighbouring properties on the opposite side of Whytecliffe Road South. The windows on the southwestern flank of 58 Whytecliffe Road South are required to be (as secured by condition 8 of planning permission 18/02340/FUL) obscurely glazed and serve non habitable rooms or small secondary windows in any event, as such would not result in any significant privacy conflict. 24 Whytecliffe Road South that is in use as job centre/office has two windows located on its flank elevation that are obscured glazed.
- 9.36 In terms of privacy within the development itself, the finger blocks have good separation distances internally of at least 17m. There are some potential conflicts between terrace areas and adjacent windows to the terraces. The locations of the privacy screens are indicated on plans and are recommended to be secured by condition. Balconies have been designed to have a denser lower portion of railing to their base, to help assist with residential privacy. On main frontage facing Whytecliffe Road South, there are no homes that are directly located at pavement level, with homes either at upper raised ground floor level or first floor level. Planters and planting would be used within communal spaces to ensure appropriate privacy relationships to homes.



Figure 14 - CGI image showing balcony and privacy screen design.

- 9.37 10.1% (24) of homes will be Wheelchair User Dwellings and meet Building Regulations M4(3) and 89.9% (214) of homes will be accessible and adaptable, and meet Building Regulations M4(2). This is in line with policy and is recommended to be secured by condition. The M4(3) homes are located throughout the development and there is a broad range of types (9 studios/ 1 one bed, 8 two beds and 6 three beds). Final details would be secured through building regulations.
- 9.38 The development has been designed to ensure the safety of future residents in terms of fire. Each core would contain a fire evacuation lift, and two stairs, ensuring safe and dignified emergency evacuation for all building users in line with Policy D5 of London Plan (2021).
- 9.39 London Plan (2021) Policy D12 Fire Safety requires all major developments to be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The applicant has submitted a Fire Strategy produced by FDS Consult (UK) Ltd. The strategy has been written by Granville Harris CEng, MSc, BEng (Hons), MIFireE whom also has extensive experience and is a suitably qualified assessor.
- 9.40 Officers have reviewed the information alongside our Building Control colleagues and consider the report is generally reasonable. Fire evacuation lifts are proposed in each core ensure safe and dignified emergency evacuation for all users in line with London Plan (2021) policy D5. The development has been revised to ensure that it has two stair cores within each block. Whilst this safety measure is not technically required for this scale of building, it does demonstrate a commitment to high standards of fire safety. Some minor issues have been identified and clarifications are required, what is to be expected given the design stage of the development, and importantly all represent solvable issues and in part resultant from stage of development which the scheme is at and information that would be reasonably available and are recommended to be secured via condition. For future note and clarity, the development was not eligible under Planning Gateway One, as the application was submitted prior to the gateway process Building Safety Bill coming into force, on the 1<sup>st</sup> of August 2021.

*Private and Communal Amenity Space, and Playspace*

- 9.41 All homes would have access to private amenity space in the form of a balcony/terrace/garden, which meets policy standards.

9.42 There is 1,791sq.m of communal amenity space, which has been designed to provide spaces for resting, socialising and play, whilst also increasing biodiversity. The community amenity spaces between the blocks are interconnected via covered passageways, so residents of the blocks can access them all. There is a mixture of both large communal garden courtyard spaces and communal roof terraces. Each of the three main courtyard spaces has been designed to have their own character (Downland, Heathland and Great Northwood) that seeks to respond to the natural landscape character of Purley and the surrounding area.



*Figure 15 – Inner courtyard design (between block C and D) illustration showing what the courtyard would look like in the 5<sup>th</sup> year following planting.*

9.43 877.3 sq.m of child playspace is required based on the London Plan (2021). The proposed development would provide 1,009 sq.m of play areas identified, spread throughout the landscape. In addition, there is a further 476 sq.m of sensory space, that provides a mixture of play and amenity space. Examples of play equipment are provided in the landscape design and access statement, which includes both formal equipment (playhouses and four in row games) and informal play opportunities (boulders/sensory path/log piles). The relatively flat topography of the landscape would create the appropriate base to ensure the provision of accessible play for a range of abilities. Detailed plans and specifications are recommended to be secured via condition to ensure any play provision is in line with Mayor of London ‘Shaping Neighbourhoods: Play and Informal Recreation SPG’.

9.44 Overall, the proposed development would provide well-designed homes that would provide a high standard of residential accommodation that are supported by high quality communal spaces.

### **Impact on the appearance of the site, surrounding area and heritage**

#### *Heritage and Impact on Wider Views*



9.45 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 the building or its setting or any features of special architectural or historic interest which it possess. 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.

9.46 The NPPF (2023) places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets and affords great weight to the asset's conservation. At paragraph 205 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”*

9.47 Any harm to a designated heritage asset, including from development within its setting requires “clear and convincing justification” (paragraph 206), with less than substantial harm weighed against the public benefits delivered by the proposed development (paragraph 207).

9.48 NPPF (2023) paragraph 196 (d) requires ‘opportunities to draw on the contribution made by the historic environment to the character of place.’

9.49 With regard to non-designated heritage assets, paragraph 209 of the NPPF (2023) states that:

*“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing...applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

9.50 Policy DM18 of the Croydon Local Plan (2018) permits development affecting heritage assets, where the significance of the asset (and setting) is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets.

9.51 There are no heritage assets on the site, but there are a number of heritage assets in the area that have the potential to be affected. A heritage statement has been undertaken and this, in conjunction with the townscape views analysis in the Design Access Statement as well as verified visual montages is sufficient to understand the likely impact on the setting of local heritage assets.

9.52 The proposed development would have no adverse impact or harm to the setting of listed buildings, or on conservation areas. There is some limited visibility of the development in setting views of listed buildings (Grade II Purley Library, Grade II Purley United Reformed Church, Grade II Russell Hills School) and from within the conservation area (Webb Estate), however these views would be at significant distance and the development would form an

insignificant background element that would be read in the general context of Purley skyline/development pattern, and in many instances obscured by trees/buildings. The development would not affect how these heritage assets and their significance would be experienced. In the future, consented development if delivered (such as Mosaic Place, formerly Purley Baptist) would further obscure any visibility, and if such visibility still existed, then the development would appear minimal in comparison to these often much larger and closer buildings. The proposed development would preserve the character and appearance of adjacent conservation area, and the setting of all listed buildings, including any special architectural and historic interest that they possess.



*Figure 16 – Verified montage from Furze Lane (within Webb Estate Conservation Area). Blue line shows other approved development, white indicates development's mass (when submitted).*

- 9.53 Locally listed buildings close to the development in order of proximity are - Purley Train Station (immediately to the south), 1 to 13 High Street (90m to the north-west) and 960 Brighton Road (200m to the west). The buildings on the High Street and Brighton Road views towards the site would be obscured by existing buildings, so their setting would not be harmed. From Purley Train Station, which dates from 1899, extends behind 24 Whytecliffe Road South (Purley Job Centre). The station is of historical and architectural interest, designed in red brick and stone with domestic period style characteristic of suburban stations of the time. Although the area has developed over the last century the building still retains a local landmark status and its setting is an important part of its overall character. There are three main vantage points where the station and development would be read together. One being close to station forecourt, where the development would rise above the Job Centre, one from within the station forecourt itself and the final view from the raised platforms of the station itself. There would be some harm to the setting of locally listed building due to the height and bulk of the development, although due to distance and established altered setting, this would be at the lower end of less than substantial harm.
- 9.54 Purley Local Heritage Area sits to approximately 100m north/northwest of the development, focused largely on the historic core that runs along Brighton Road. Due to the surrounding built form, the development would largely not be visible from the Purley Local Heritage Area. There would be some visibility near the junction of High Street/Woburn Avenue/Brighton Road, however the view

would be oblique/limited, and in the majority of views, the view would be in large part defined by the bulk of the multistorey car park and leisure centre. In this context, the proposed development would cause minimal harm (at the lower end of less than substantial) to the Purley Local Heritage Area, and its setting.



Figure 17 – Verified Montage View (of scheme as originally submitted) from Brighton Road (within Local Heritage Area)

9.55 In terms of design and its relationship to the historic environment, as set out in the sections below, the design does draw on historical reference points from the local area that have been integrated sensitively into the design, that allows the creation of successful harmony between the historic environment and more contemporary approach.

9.56 It should be noted that the conservation officer has reviewed the submitted documentation and their assessment of the proposal heritage impacts align with those set out in this section of the report.

#### *Archaeology*

9.57 The site lies outside the Archaeological Priority Area but was referred to the Greater London Archaeological Advisory Service (GLAAS), due to being a major development. The applicant has submitted a desktop-based assessment that indicates that the archaeological potential of the site is low to moderate, with remains expected to be found based on the sites and area's history of local to regional significance. GLAAS have advised that development could cause harm to the archaeological remains and therefore field evaluation is needed to determine appropriate mitigation. They advise that archaeological interest can be appropriately safeguarded through a pre-commencement condition, and as such a condition is recommended to this effect.

#### *Height*

9.58 Croydon Local Plan (2018) policies SP4, DM15 and place policy DM42: Purley and London Plan (2021) policy D9 are the most relevant policies in regard to the consideration of tall buildings in this location.

9.59 Policy SP 4.5 states:

*“Proposals for tall buildings will be encouraged only in the Croydon Opportunity Area, areas in District Centres and locations where it is in an area around well-connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or District Centres. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and/or in District Centres, will be contained in the Croydon Local Plan’s Detailed Policies and Proposals. Furthermore the Croydon Opportunity Area Planning Framework should be referred to when considering the location and design of tall buildings in the Croydon Opportunity Area.”*

9.60 Policy DM15 states:

*“To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they meet the following criteria:*

- a. They are located in areas identified for such buildings in Policies DM34 to DM49;*
- b. They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4, with direct public transport connections to the Croydon Opportunity Area;*
- c. The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale;*
- d. The building height, footprint and design relates positively to any nearby heritage assets, and conserves or enhances the significance and setting of the assets of the wider historic environment;*
- e. To improve the quality of and access to open space, developments including buildings taller than 40 storeys will need to incorporate amenity space, whether at ground level such as atria or above ground level, such as sky gardens and roof terraces, that is accessible to the public as well as residents of the development; and*
- f. To ensure tall and large buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm.”*

9.61 In the context of policy SP4 of the Croydon Local Plan (2018), the proposed development is classed as a tall building as it is higher than six storeys or 25m. It would also meet the broader definition set out in Croydon Local Plan (2018) policy DM15.

9.62 Policy DM42: Purley states that within Purley District Centre and its environs, to ensure that the proposals positively enhance and strengthen the character and facilitate growth, developments should *‘Complement the existing predominant building heights of three to eight storeys, with a potential for a new landmark of up to maximum of 16 storeys’*.

9.63 Supporting text to policy DM42 of Croydon Local Plan (2018) notes that the area has a varied typography, which presents opportunity for tall buildings.

- 9.64 The proposed development has a maximum height of nine storeys. The implemented and extant Mosaic Place (formerly Purley Baptist) development (planning reference 16/02994/P) has a tall building element that is up to 17 storeys in height, which fulfils the landmark height exception set out in DM42 (noting the policy says up to maximum of 16 storeys). Officers therefore consider the 9-storey height of the development to be contrary to policy DM42, as it exceeds the three to eight storey height parameter.
- 9.65 It should be noted that planning permission (reference 20/06224/FUL) has been granted at 922 to 930 Purley Way, for three apartment blocks that were 6, 9 and 12 storeys in height. The officer's report produced for the Planning Committee on the 26<sup>th</sup> of August 2021 sets out that whilst the development would exceed the height, it was not considered to create 'a landmark building' which competes with the Mosaic Place development. Instead, it was considered that the 9-storey building would complement predominant building heights that included an 8-storey flatted block set at higher land level on Russel Hill Road. The 12-storey element was however considered a departure.



*Figure 18 - CGI of granted planning permission 20/06224/FUL taken from junction of Foxley Land, Purley Way and Pampisford Road junction.*

- 9.66 Similar reasoning given for the 9-storey element in planning permission 20/06224/FUL summarised in the paragraph above could also be applied to the current development for consideration. As set out in greater depth below, the ninth floor is heavily recessed ensuring it forms a non-dominant part of short, medium, and long-range views. The 6-storey main bulk of the development seeks to respond to the prevailing height, and then steps back to form a two plus one storey roof level. The approach to massing seeks to complement existing heights and form, rather than being a landmark building, where the associated design rationale would be to stand out and be recognised from a significant distance. It would not compete with the intended landmark of the Mosaic Place development, or impact associated townscape legibility. The increase in height of the building towards its rear, is also reflective of change in land levels which increase to the rear of the site. So, whilst the height does exceed the 8-storey place policy when measured from the street, this is largely not the case when the height is measured from the respective/adjacent current land level. This reduces the experience of the height, making for example the building read as six/seven storeys from the rear.

9.67 Officer's, in judging the acceptability of this scheme, have taken a different approach. This, in part, has been informed by useful clarification around the interpretation of the tall building policy, and specifically London Plan (2021) policy D9, provided by case law. The relevant case law being a High Court judgement, commonly referred to as Master Brewer case (London Borough of Hillingdon, R (on the application of) versus Mayor of London (2021)). This judgement was issued on the 12<sup>th</sup> of December 2021, which is after the Officer's Committee Report referenced above in connection was 20/06224/FUL was written, published and considered, although the actual decision was issued after this judgement.

9.68 The London Plan (2021) policy for tall buildings, D9, is detailed and provides an appropriate framework for the consideration of tall buildings. London Plan (2021) policy D9 can be broadly defined into two main parts, Parts A and B which relates to the locational aspect of tall buildings, Part C which is broader and captures a number of planning considerations. There is also part D, which relates to public access (for note the development is considered to comply with part D due to the proposed community use – see relevant section).

9.69 Part A and B of London Plan (2021) policy D9 provides a definition for tall building, as well as appropriate locations for tall buildings that are to be defined through the local plan. In the context of Croydon Local Plan (2018), officers consider that the development, whilst located in a highly accessible location, with direct links to Croydon Opportunity Area, exceeds the height requirements of place policy DM42. As such the development does not comply with the locational aspect of London Plan (2021) policy D9, specifically parts A and B. It should be noted that the GLA take a different view, and in their stage one response considered that the development did comply with D9 (B).

9.70 The Master Brewer High Cour however clarified that a proposal can still comply with Policy D9, when read as a whole, where it does not meet parts A and B, but does meet the tests of Part C. The fact that the scheme does not comply with the locational aspects of the policy are not fatal to the scheme.

#### *Views*

9.71 In terms of long-range views, the development is not of height that would rise significantly above prevailing heights, that it would form a high-rise landmark. The height instead forms part of a logical established layering of heights, where heights are lower within the local heritage area/district centre and increase towards the periphery. This layering/massing approach will become more apparent and strengthened once consented schemes such as Moasaic Place, are fully constructed.



Sketch of proposal amongst Purley as existing

*Figure 19 – Illustrative sketch of proposal in context of surrounding heights*

9.72 As demonstrated through model testing done by the applicant, in the majority of views from surrounding streets, the height of the development is hidden behind existing buildings and trees. Where long and mid-range views are possible, they are generally limited to certain positions/angles, and as such have limited impact on how places would be experienced in general. Even in such views, in townscape legibility terms, the position of height adjacent to the train station is useful and logical, serving a wayfinding purpose and as way of marking presence of the town centre, without significantly compromising on the local heritage area itself (noting the heritage conclusion above).



*Figure 20 – Verified Montage View of development (when it was submitted) from Gyratory where Brighton Road meets Banstead Road.*

9.73 In short range views, the first six storeys echo the form and experience of a mansion block typology, creating a coherent urban form and defined street edge. The six-storey height of the building's base compliments the six-storey height of surrounding buildings, notably 17 to 23 Whytecliffe Road South and 51 to 53 Whytecliffe Road South that are found on the opposite side of the street, as well as being read in the general height context of six storeys of Astoria Court at the junction of Whytecliffe Road South and High Street. When standing immediately in front of the building, the upper three storeys (i.e., storeys seven to nine) will not be visible. At angled views from the periphery to

the north and south, the seventh and eighth storey would be visible, where it will be seen as a coherent set back roof form. The ninth floor is heavily recessed, such that it will be barely visible in short range views, to such an extent that it would not significantly erode how the building is experienced.



*Figure 21 – CGIs of the development when viewed from Whytecliffe Road South, both north and south*

9.74 From rear views, most notably Purley Train Station platforms, the development would appear as seven storeys in height (with one of those levels being recessed). This is due to land level changes with the station platform being approximately 2.5 storeys higher than the street level on Whytecliffe Road South. Such height is common next to stations (especially in the context of needing to optimise sites with very good transport connections as enshrined in London Plan (2021) policy), and useful wayfinding to passengers, marking a sense of arrival into Purley.



*Figure 22 – CGI of the rear elevation from station platform*

### *Topography*

9.75 The land level increases to the rear of the site by up to 6m, which helps reduce the impact of the height of the development when viewed from the rear, most notably from the station platforms (as shown in the image above). There is a level change of approximately 3m at the front of the site along the street, with the highest point located closest to the station (so to the south), descending down towards the current station car park entrance. The massing successfully responds to this by stepping down half a storey, halfway along the length of the front façade.





Figure 23 – Proposed front elevation drawing.

### *Design Process/Site Optimisation*

9.76 A central component of the London Plan (2021), that forms a thread in several policy requirements, is that development must make the best use of land by following a design led approach, that optimises the capacity of the site.

9.77 The Mayor of London's 'Optimising Site Capacity: A Design-led Approach' London Planning Guidance provides guidance on how to undertake this process. The design led approach advocated seeks to establish good growth to optimise site capacity, rather than maximising density. This requires a response to existing character and distinctiveness of the surrounding context, and balancing the capacity of growth, need for increased housing supply, and key factors such as access by walking, cycling and public transport. The document is of direct relevance to the assessment of quality of residential accommodation, and associated London Plan (2021) Policy D6.

9.78 The guidance sets out a step-by-step design approach, to arrive at what can be classed as the optimum form. The scheme was developed through extensive pre-application engagement prior to the formation of such guidance and adoption of policy. Nevertheless, as the applicant has followed good design practice, with robust processes, as illustrated through their detailed design and access statement, as well as having attended two Place Review Panels (now renamed as Design Review Panels), officers consider that the development is still in conformity with the guidance. A summary of the guidance provided by the Optimising Site Capacity: A Design-led Approach LPG, and how the applicant/application has met that guidance, along with examples of the applicant's work is provided in appendix 3 Officers are satisfied that the form presented to members represents good growth, makes the best use of the land, optimising the site's capacity.

### *Architectural Form*

9.79 The proposed development adopts a mansión block typology. Whilst mansión blocks are not currently common in Purley, they are a form that are highly compatible with urban environments and have the significant benefit of allowing site optimisation and density to be delivered in this sustainable location, whilst being a form that is flexible enough to respond to heights, general urban grains and patterns. They help to create a strong street edge that helps forms an attractive urban environment and can pick up on architectural language and materiality of its surrounds, whilst also having their own individual architectural

treatment and character. It is a form that is particularly suited to the characteristics of this site as it has a long street edge, but a relatively narrow depth in comparison.

- 9.80 Balancing the need to create a strong street edge, whilst also preventing the development appearing monotonous or overwhelming, the scheme has been developed with a varied roof line, with distinct breaks between each of the taller setbacks. There is a fuller height break between blocks C and D, to help create space and relief, strengthen the quality and reflecting the importance of the enlarged public realm set between the façade and retained street lime tree, creating potential framed views of Purley Hills beyond.
- 9.81 The proposed front building line and street frontage varies along its length to help break up the massing, create identity and variation through the introduction of bay windows, but also to sensitively respond to and allow the retention of the important street facing lime trees. The required retention of these trees provides the opportunity for an enlarged public realm space. The façade is set back, aligning closely at the south-western end with the facade of 24 Whytecliffe Road South. At the north-eastern end, the façade is set back from the adjacent 58 Whytecliffe Road South front building line, in large part to ensure the retention of the large lime trees. However, this set back also reduces the visibility of the upper storeys, supporting the transition in height from the five storeys of 58 Whytecliffe Road South, whilst also reducing the prominence of the station car park entrance. The set back building line from the site edge allows the creation of the space for substantially improved public realm, greening of the street and widened pavement widths.
- 9.82 From the main frontage extends a series of four characteristic finger block forms. This allows the depth of the site to be utilised, whilst also providing space for the creation of pleasant and generous sized external courtyard spaces between them. These courtyards have open aspect to the southeast, that seeks maximisation of sunlight, ensuring the external spaces and units which look into them are well lit and pleasant. The finger blocks reduce in width as they extend towards the rear boundary, to support the sense of openness and increase sunlight penetration. There is a gap between the rear of the blocks and the rear boundary, so that the development does not adversely impact on the operation of railway, but also allows the creation of a biodiversity corridor.

#### *Elevation Design*

- 9.83 The strength of the mansion block typology, including the staggered layering, creates a high-quality design foundation that is then enhanced through detailing. Bay windows are utilised that are a common feature in the locality, but also draw from historic mansion blocks forms. The bay features, combined with the setbacks in facade, help articulate the composition of the façade, adding depth and interest, whilst also improving the living conditions of the residents themselves. They add vertical emphasis, and their repeating pattern at irregular intervals echoes the way that pediment gables are used within the Local Heritage Area. The creation of base, middle and top, that reflects a common townscape characteristic of surrounding and emerging buildings, is emphasised through different materiality and detailing. The base is made of

dark red precast concrete, with the middle (storeys one to six) a dark red brick of similar tone to the base, and top (storeys seven and eight) with a red brick. The rear elevation adopts this same red brick as found on storeys seven to eight, with a light red brick forming the final ninth storey. The dominance of brick as elevation material ensures robustness, but also creates direct reference to historic materiality of the area.



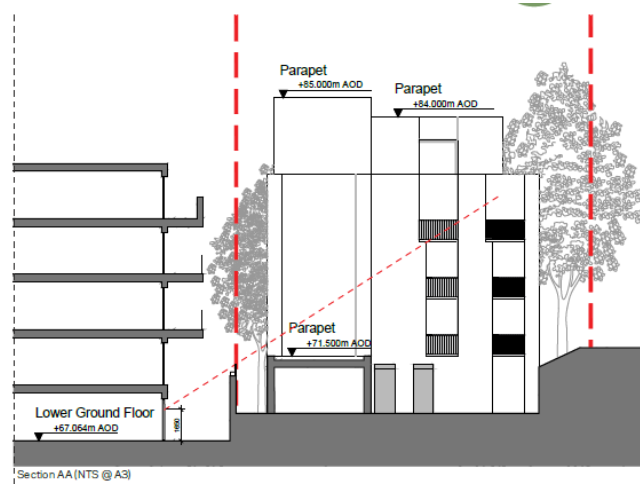
*Figure 24 – Examples of proposed detailing and materiality.*

9.84 Entrances have generosity and prominence, enhanced through the use of green glazed tiles/bricks and fluted heading details, that helps to create activation and legibility. Folded metal panels are used to the cycle stores, to ensure that they form a decorative feature, rather than purely functional ones. Decorative panels and detailing would also be applied to façade, to prevent featureless walls.

9.85 The architectural language and approach have similarities with other development approved, most notably planning permission 20/06224/FUL (see figure 18) which relates to a site at the junction of Foxley Lane, Purley Way and Pampisford Road junction. This will help create a visual coherence to the area and helps shape identity. It is an important justifier for the design of the scheme, as consistency in decision is central component of planning system reinforced through case law.

### *Block E*

9.86 Block E utilises the north eastern wing of the existing car park. It is a relatively modest block of five storeys that is not widely visible, apart from some acute angles and to passengers of the train line. It is a similar height in storeys and scale to the recently constructed 58 Whytecliffe Road South, whilst its design and materiality relates to the larger mansion blocks that would be delivered by the development. The form has been devised to ensure it has a balanced amenity relationship with its neighbours. This block's amenity space would be in the form of winter gardens due to the proximity of the railway line, as required by Network Rail. Walkways have been designed to provide pleasant experience and protection from vehicles utilising the car park. This walkway benefits from natural surveillance from residents within block D, with additional safety provided by lighting and CCTV.



*Figure 25 – Section showing relationship of block E to 58 Whytecliffe Road South*

### *Public Realm/Landscaping*

9.87 The existing public realm along the site's frontage is very poor, defined by narrow pavement widths of 1.7m to 2m, that create an unpleasant pedestrian experience, dominated by passing traffic. The proposed development presents a significant opportunity to substantially resolve this and improve the experience. This is a substantial benefit in the application's favour given the importance of this stretch of public realm as a way of accessing Purley Train Station. It would be an important piece of the public realm infrastructure and the promotion of active lifestyles and sustainable modes of travel.

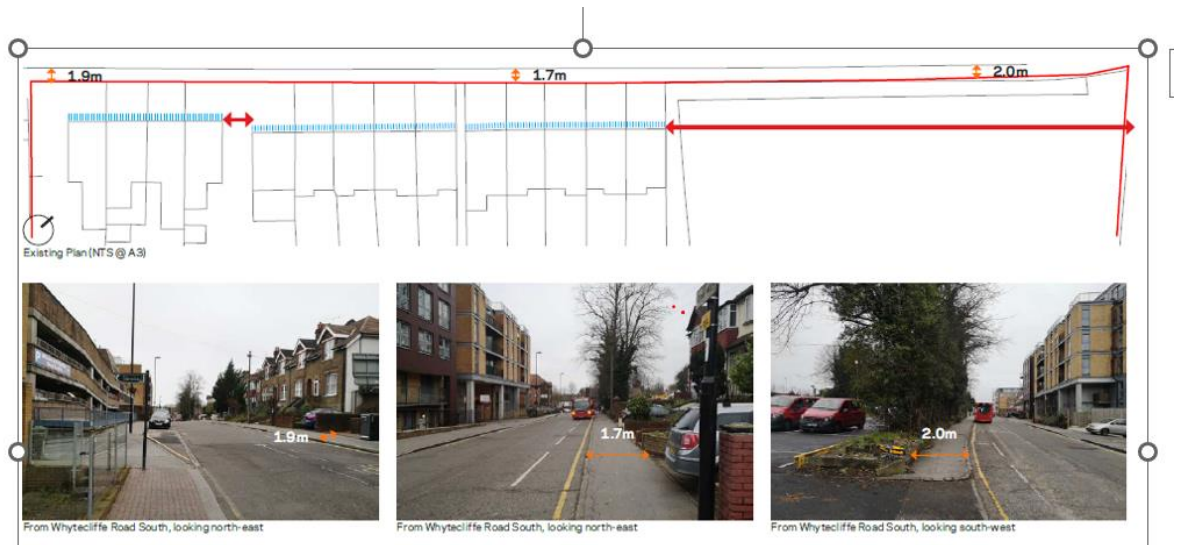


Figure 26 – Plan of existing pavement widths and photos of relevant pavement section

9.88 The proposed development would create a generous frontage that ranges between 6.1m to 14.6m in depth. The increased width allows the greening of the street, with planting used to help provide a visual and amenity buffer between pedestrians and passing vehicles, whilst also enhancing biodiversity. The approach allows additional tree planting, helping to facilitate tree lined streets, in line with the general objectives of the NPPF (2023). The final design of the landscaping to the former pavement may vary from what is currently indicatively shown, as it will need to go through technical review and highway safety audits but would still be an improvement compared to the existing. Given pedestrian footpaths would be reconfigured into the current applicant's ownership area, these are likely to need a S.38 agreement (for adoption by the Council) with a maintenance contribution secured which is normally for a period of 30 years. At the northern end of the frontage, utilising the benefits of the retained lime trees, an enlarged green public space would be provided, creating a much-needed respite for pedestrians, as well as potentially sitting and dwelling space, away from the noise of the street.

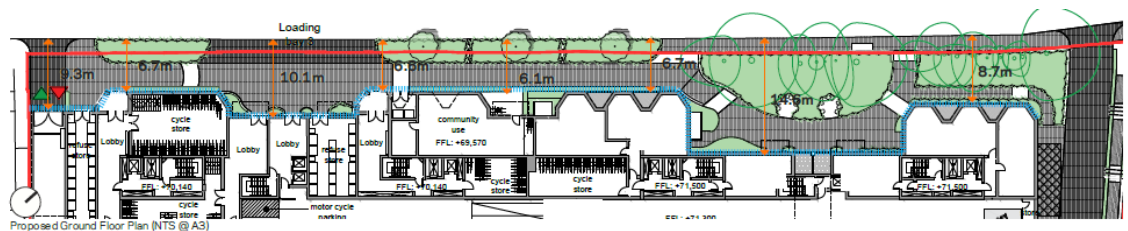


Figure 27 – Proposed plan showing proposed pavement widths

9.89 Surfaces treatments and patterns are used within the paving to define difference purposes of spaces, whilst also adding visual interest to create active engaging public realm. Raised planters are used to help. Sustainable urban drainage systems will be integrated into the public realm, to help assists water quality, add interest, and improve flooding performance.

### Public Art

9.90 A public art brief has been produced by the applicant. The aim of the public art brief is to knit the public realm together, through the creation of a continuous theme. There are two main areas identified for public art; the enlarged public space at the northern end, and within the ground floor façade itself, including but not limited to residential entrances, cycle store screens, bin stores and car park gates. The brief sets out the project aims, including the use of local artists and resident engagement, sets out a number of expectations around the competency of the artist and a number of objectives, including ensuring the art relates to the social, cultural and architectural heritage of Purley. It sets out some precedent examples and strategy for implementation. The brief is sufficiently detailed for this stage of the development, and further development and implementation is recommended to be secured by legal agreement and/or condition.

#### *Designing Out Crime*

9.91 The application has been reviewed and discussed with Metropolitan Police Designing Out Crime officer. They raise no significant concerns and have recommended conditions be applied to both the residential and community elements of the development to secure further consideration and design development, and in turn expected secure by design accreditation. Such conditions are recommended.

9.92 In conclusion, the proposed development would form a high quality, contemporary and contextual sensitively designed building that would improve the public realm and improve the appearance of the site, street and surrounding area.

#### **Impact on Neighbouring Properties' Living Conditions**

##### *Daylight and Sunlight Impacts*

9.93 The applicant has submitted a sunlight and daylight study that tests the scheme against guidance contained with BRE's 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' End Edition, 2022'. See Appendix 2 for BRE sunlight and daylight definitions. The assessment measures the impact of the development on the following properties: 51 to 53, 58 (consented scheme), 62 (consented scheme), 65, 67, 75 Whytecliffe Road South and 43 to 49 Redbarn Close. Consideration has also been given to the emerging scheme at Purley Multi Storey Car Park.

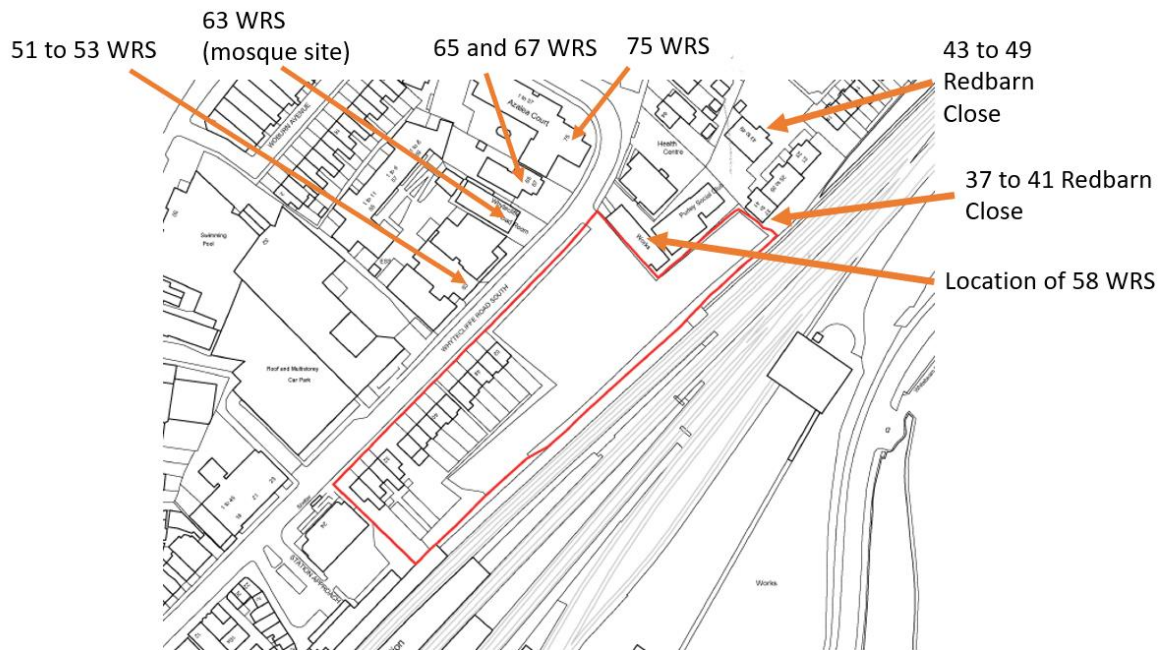


Figure 28 – Map indicating relevant neighbouring property locations.

9.94 The Mayor of London’s Housing SPG states the following:

9.95 *“Policy 7.6Bd requires new development to avoid causing ‘unacceptable harm’ to the amenity of surrounding land and buildings... An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time. The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.”*

9.96 The site, with its highly sustainable location, very good public transport links, brownfield characteristics and close proximity to town centre, is one where policy directs high density residential development towards. In addition, the car park is an allocated site, which adds to the intrinsic policy expectation for high density development to occur. Officers therefore consider it is a site where flexibility to BRE standards should be applied.

*51 to 53 Whytecliffe Road South*

9.97 In terms of existing residential properties, the flats most impacted by the development are located within nos.51 to 53 Whytecliffe Road South, that sit opposite the site. At present flats within this building experience excellent sunlight and daylight, as they only face onto an open car park and modest two storey houses. This needs to be given suitable weight. Any meaningful redevelopment of this site would have a noticeable detrimental impact on these properties' light and outlook, with the potential to result in failure of BRE guidelines.

9.98 The development would have a significant impact on light of no.51 to 53 Whytecliffe Road South, particularly windows located at ground and first floor level. The Vertical Sky Component (VSC) results for windows which serve living kitchen dining room for flats located at ground and first floor level are presented below.

Room/window reference	Existing VSC	Proposed VSC	Reduction Factor
R2/20 W5	25	10.4	0.42
R5/20 W8	31.2	16.5	0.53
R5/20 W9	15.2	8.3	0.55
R1/21 W1	19.5	6.6	0.34
R1/21 W2	14.4	4.5	0.32
R5/21 W6	17.0	3.5	0.21
R8/21 W9	17.9	4.5	0.25
R8/21 W10	3.6	1.7	0.47

*Figure 29 - Impact of development on light of living kitchen dining areas located at ground and first floor level within 51 to 53 Whytecliffe Road South*

9.99 Officers consider that the development's impact on daylight to flats within nos. 51 and 53 is not being caused by an excessive or aggressive approach to massing by the development, but instead the main factor is the design and form of nos. 51 to 53 Whytecliffe Road South, specifically the overhang at first floor level and balconies, as seen in the image below, and the fact the application site is largely open car park opposite these properties.



*Figure 30 – Photo of lower two floors of Whytecliffe Road South*



9.100 BRE guidance recognises significant light challenges such features present. BRE guidance states the following: *“Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, with the balcony in place. For example, if the proposed VSC with the balcony was under 0.8 times the existing value with the balcony was under 0.8 times the existing value without the balcony was under 0.8 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.8, this would show the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light.”*

9.101 In order to help demonstrate that the balconies/overhang is a sizeable contributor to light performance, the applicant has run a model which removes the balconies/overhangs. Most of the windows when measured on an unfettered façade (a façade where balconies/projections are removed), would receive a retained VSC of 18% or more, which is common for an urban environment. The exceptions are shown in the image below highlighted by yellow and red. For these windows a significant contributing factor for their poor performance is due to the opening’s location in a corner. BRE guidance highlights that such scenarios make compliance difficult to achieve.



Figure 31 – Colour coded model showing retained VSC values once impacts of balconies/overhangs is removed. Green windows are those with retained values over 18% VSC.

9.102 To further support the case that the development’s mass and its associated impact is not an unreasonable one, the applicant has tested the impact of a six-storey benchmark development and has compared it to the impact of the proposed development. There is merit in using a six-storey building as a benchmark, given that the Purley Place policy advocates for a development between 4 and 8 storeys in height, given this height is comparable to other

surrounding buildings (and therefore a form of development that would be entirely reasonable to expect) and the same height as the main property being impacted. The six-storey model is shown below.

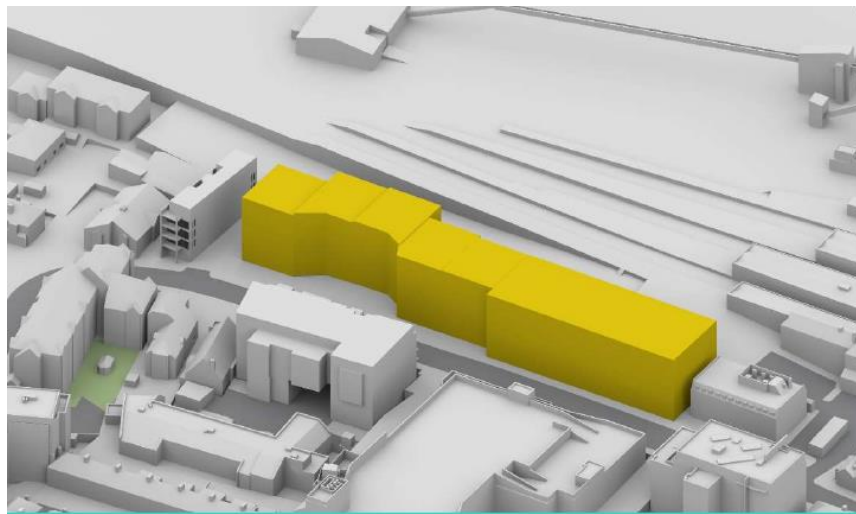


Figure 32 - Showing the baseline model used to inform benchmark/alternative values.

9.103 The applicant states that when the development is compared to six storey massing, the variations in the retained VSC values are less than 2%, with many of the ground and first windows performing better under the development than compared to the benchmark. The table below provides window VSC performance for the most relevant living kitchen dining rooms, where light is considered to be most important, compared against the benchmark scheme. There would be little noticeable difference between the benchmark scheme and that proposed, whilst the benefits of the larger scheme are numerous.

Room/window reference	Existing VSC	Proposed VSC	Reduction Factor	Benchmark VSC	Benchmark VSC Factor
R2/20 W5	25	10.4	0.42	10.6 (+0.2)	0.42 (0)
R5/20 W8	31.2	16.5	0.53	16.5 (0)	0.53 (0)
R5/20 W9	15.2	8.3	0.55	8.2 (-0.1)	0.54 (-0.01)
R1/21 W1	19.5	6.6	0.34	5.9 (-0.7)	0.3 (-0.04)
R1/21 W2	14.4	4.5	0.32	3.7 (-0.8)	0.26 (-0.08)
R5/21 W6	17.0	3.5	0.21	4.3 (+0.8)	0.25 (+0.04)
R8/21 W9	17.9	4.5	0.25	5.1 (+0.6)	0.29 (+0.04)
R8/21 W10	3.6	1.7	0.47	1.3 (-0.5)	0.36 (-0.11)

Figure 33 - Impact of development on light of living kitchen dining areas located at ground and first floor level within 51 to 53 Whytecliffe Road South, compared to benchmark model.

9.104 To help visualise what the above numbers translates to in terms of impact, the applicant has used their model to demonstrate what the view out of window R1/21 W1 would theoretically be like (see image below). The grey is the underside of existing balcony that has baseball hat like effect over the window blocking light and outlook, the yellow is the benchmark scheme massing, and blue is the additional impact of the development versus the benchmark.



Figure 34 – Visualisation showing view of benchmark development (yellow) with proposed development (blue) to R1/21 W1 highlighting minimal difference.

9.105 In terms of impact of sunlight on 51 to 53 Whytecliffe Road South, as the impacted property currently faces an undeveloped site, it would experience a higher proportional loss of sunlight. However, once consideration is given to balconies/overhangs, and the impact of these are removed, the sunlight performance would be good for an urban environment, for example with all living kitchen dining rooms receiving 5% of Winter Annual Probable Sunlight Hours (APSH) and 25% on annual basis.

#### *58 Whytecliffe Road South*

9.106 58 Whytecliffe Road South lies immediately to the north of the site. The south-west facing windows located on the flank elevation of 58 Whytecliffe Road South that directly face towards the development shown on approved plans are either non-habitable or are secondary windows serving dual aspect living rooms or bedrooms and are required to be obscurely glazed. The impact of the development on these windows is acceptable.

9.107 Each storey at first floor level and above at 58 Whytecliffe Road South has a living kitchen dining room located on its rear elevation that is served by a terrace, that runs three-quarters of the elevation. The windows at first floor level and above that are not located beneath a balcony (i.e. on the remaining quarter of the elevation), that also serve the same living kitchen dining area, would continue to receive good retained VSC levels of 18% and above.

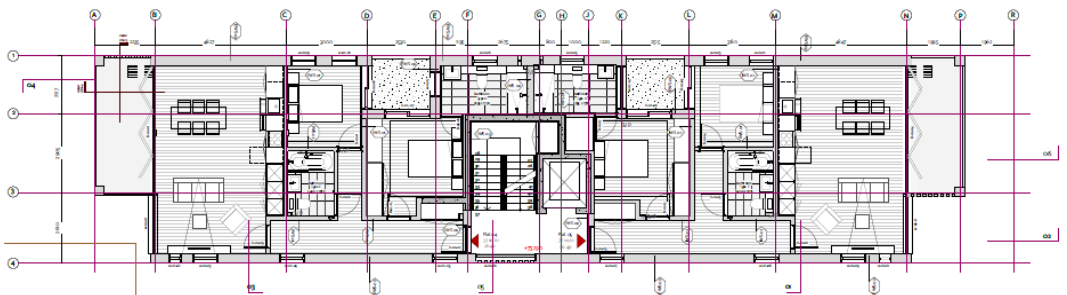


Figure 35 – Showing floorplan approved under Non-Material Application for 58 Whytecliffe Road South.

9.108 The windows at ground floor level within 58 Whytecliffe Road South have different circumstances to those above. The windows serve a bedroom and living kitchen dining room and are situated in a lightwell (see figure 36) that is close to the boundary that results in them already receiving poor levels of light (VSC of circa 9%), as well as being sensitive to change. There are three windows serving the living kitchen dining area, two of these would not experience any reduction in VSC, but one window VSC would reduce from 9% to 4.8% (conflicting with BRE guidance). The change to this one window's light would not significantly impact overall quality of light to this space and how it would be experienced. The remaining bedroom window has an existing VSC of 8.9%, which would reduce to 5.7%. Given the poor light to this room and its use, as well as characteristic of this window's location that makes it overly sensitive to change, no objection is raised.

9.109 In conclusion, the resulting poor quality of light within this unit is largely a result of the design/massing approach of 58 Whytecliffe Road South, due to the limited distance the development is from the boundary that makes it overly reliant on light over land not within its control.



Figure 36 – Rear of 58 Whytecliffe Road South showing balcony/lightwell relationship to windows.

9.110 In terms of sunlight to 58 Whytecliffe Road South, all relevant windows would continue to receive sunlight in accordance with BRE guidance, except those at ground level, which will have APSH values of 14% and 16% on an annual basis against a target of 25%. The performance of these windows is largely accredited to their position within a lightwell that makes them overly sensitive to development.

*63 Whytecliffe Road South (Mosque site)*

9.111 Planning permission has been granted and implemented for a new mosque, with two studio units at third floor level facing towards the site. Given that these units are located at third floor level and size of openings, the proposed development would not have an unacceptable impact on their light, especially in the context of urban environment. The proposed development would also not have an unacceptable impact on light serving the mosque.

*65 and 67 Whytecliffe Road South*

9.112 65 and 67 Whytecliffe Road South are former offices that have been converted to residential under permitted development, where quality of accommodation at the time was not a material planning consideration.

9.113 65 Whytecliffe Road has a corner location, with a cantilevered bay at first floor level. Four windows would have a retained VSC of over 14%, with exception of the ground floor level which is under the cantilevered bay. This ground floor opening scores a retained VSC value of 9%. Given their corner location and ground floor windows position under a cantilevered bay, the impact of the development on their VSC is justifiable.

9.114 In terms 67 Whytecliffe Road South, the vast majority of windows comply with BRE guidance. There are three window exceptions, all of which serve bedrooms, and with all these windows still receiving over 16% VSC, which is good for an urban environment.

9.115 The impact of the development on both 65 and 67 Whytecliffe Road South sunlight complies with BRE guidance.

#### *75 Whytecliffe Road South*

9.116 In terms of 75 Whytecliffe Road South, the vast majority of windows would retain VSC of 18%. The exceptions are secondary windows in bay windows or windows which are located in a corner, where the form of the building is a significant contributing factor to the resulting performance. These corner windows only marginally fail the VSC ratio reduction test, with windows retaining 73% to 79% of their existing VSC (with 80% being compliance). All rooms would comply with BRE sunlight guidance.

#### *43 to 49 Redbarn Close*

9.117 In terms of 43 to 49 Redbarn Close, these properties retain very good level of VSC of at least 24% and retain over 80% of their previous VSC value. Whilst there is non-compliance with the No Skyline Line test (NSL), which prevents compliance in regard to BRE, the failure is very minor (lowest reduction of 0.73 against target of 0.8). In terms of sunlight, the property would be BRE compliant.

#### *37 to 41 Redbarn Close*

9.118 There are two small high level rectangular windows located on the flank elevation of this property that face over the car park. These windows serves bathrooms, that are classed as non-habitable rooms. Given the characteristics of these windows, the development's impact on their amenity including light is acceptable.



*Figure 37 – Window on side elevation of 37 to 41 Redbarn Close*

#### *Purley Multi Storey Car Park*

- 9.119 The applicant has considered the impact of the development on the allocated site at Purley Multi Storey Car Park to ensure that the development does not prejudice its future redevelopment. Measuring two hypothetical windows at ground floor level on the existing car park, the results show that these windows would have a VSC of 19%. The development is therefore not considered to unduly prejudice the redevelopment of the allocated site.
- 9.120 Planning application reference 24/00775/FUL was recently submitted and made valid for the Purley Multi Storey Car Park/Purley Pool site. The application contains a sunlight and daylight assessment that measures the impact of its development (if approved) on this currently proposed planning application. Use of this assessment should be approached with caution, given that the application for the Purley Multi Storey Car Park/Purley Pool site does not at this stage benefit from planning permission, and officer's assessment of the scheme (including associated submitted sunlight and daylight assessment) is still at an early stage.
- 9.121 The current sunlight and daylight assessment for the Purley Multi Storey Car Park/Purley Pool site outlines that the proposed development, if adopting the lower 150 Lux value for living kitchen dining rooms, would see 113 of 181 measured rooms passing. The remaining 77 rooms that fail consist of 38 bedrooms, 27 living kitchen dining rooms/studio and 12 living dining rooms. Focusing on the rooms that contain the main habitable living area (i.e. living kitchen dining rooms/studio and living/dining rooms), 15 of these would have a median illuminance below 87 lux, with the lowest being 41 lux.
- 9.122 Given the status of the Purley Multi Storey Car Park/Purley Pool site application, it would be inappropriate to make premature judgements on the appropriateness of the proposed mass/bulk of the Purley Multi Storey Car Park/Purley Pool site scheme on this application. Instead, an inward focus on this planning application for consideration is necessary, considering whether the scheme is appropriately designed, has an appropriate form/layout/mass, in context of the site allocations, given policy directs intensification to such areas and given the likelihood of some form of development. As set out throughout

this report, the bulk and form represent the optimum form of development for the site, taking a balanced approach to growth, density, design, impact on neighbours and residential quality.

- 9.123 The design of the application scheme has taken reasonable steps to future proof itself. Balconies for example can make rooms more sensitive to change, but at the same time are necessary to meet private amenity space policy requirements. To reduce their sensitivity, the vast majority of rooms that are served by balconies have alternative window(s) that do not face directly onto a balcony. The bay form that serves some of the units also helps ensure that light comes from multiple angles.
- 9.124 Steps that could be utilised to reduce sensitivity further, include (but not limited to) reducing floor plate depths, increasing the number/size of windows that would serve rooms, increasing the range of aspects or proposing a larger number of bigger units. However, all would likely have significant implications in terms of housing numbers that would be delivered, which in turn are likely to impact on the affordable housing offer. It may also create design challenges, given the benefits associated with delivering a coherent frontage. Officers are satisfied that the proposed development is a sustainable site solution, that does not unduly prejudice adjacent development opportunity.

#### *Commercial Properties*

- 9.125 There are a number of commercial properties surrounding the site, including a nursery at 62 Whytecliffe Road South, Job Centre at 24 Whytecliffe Road South, and a community use at the lower ground floor level of 51 to 53 Whytecliffe Road South. The mass of the development, and associated impact, would not be such to compromise the operation and viability of these commercial/community uses.

#### *Outlook and Privacy*

- 9.126 As set out in the quality of residential accommodation section, there is good separation distances between the development's window and neighbouring properties' windows. The proposed terraces would reduce these separation distance marginally, but not unacceptably, especially giving regard to the nature of terrace use and window impacted (often secondary), and that the impacted properties have terraces themselves, some of which directly overlook the applicant's land. It is noted that the walkway to Block E would run adjacent to a window serving 58 Whytecliffe Road South. However, these windows are obscurely glazed, and the situation is not dissimilar to the current situation with these window/openings currently adjacent to a public car park where people can walk passed.

#### *Noise and Disturbance*

- 9.127 The proposed development would be in residential use and as such would not generate significant levels of noise disturbance. Terraces are also modestly sized, which would prevent them causing significant levels of noise disturbance. Noise impacts during construction are also recommended to be mitigated by condition. Overall, the proposed development, subject to condition, would not have a significant impact on neighbouring amenity. The impact of the car park

and walkway on no.58 Whytecliffe Road South is comparable to the existing situation, with the development potentially offering an improvement due to reduced car parking numbers.

## **Transport, Parking and Highways**

### *Station Car Parking – Quantum*

9.128 Policy DM30 criterion (d) states that if a development results in the loss of existing car parking spaces, it must be demonstrated that there is no need for these car parking spaces at peak times. The site allocation requires the retention of public car parking spaces, with any car parking loss justified through a transport statement, considering the impacts on local streets.

9.129 London Plan (2021) plan policies GG2 making the best use of land and T1 strategic approach to transport set out a commitment to a strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Policies GG3 creating a healthy city and T2 Healthy Streets set out a commitment to the Health Streets Approach to improve health, reduce inequalities, reduce car dominance, road danger, severance, vehicle emissions and noise, increase walking, cycling and public transport use, improve street safety, comfort, convenience, and amenity.

9.130 TfL in coordination with the Mayor of London has publicised Healthy Street for London (2017), which sets out further detail on Healthy Street Approach. It highlights the following:

*“Roughly half of all walking journeys in London are part of longer public transport journeys – walking to or from the bus stop or Tube station. This means an efficient and affordable public transport system is just as important as great walking and cycling routes to both the health of Londoners and the smooth functioning of the city’s streets. Developing new housing around stations and improving connections to town centres will mean more people have the things they need within walking or cycling distance, while destinations further afield will be easily accessible by public transport”.*

9.131 There is no London Plan (2021) policy that outlines parking provision at railway stations. For such instances where there is no direct policy, the London Plan (2021) paragraph 10.6.5 advises as follows:

*“Where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity.”*

9.132 Policy T6 starts from the presumption of car free in well-connected places, and in other locations with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).

9.133 The above sets out an inherent policy tension between the Croydon Local Plan (2018) site allocation and Policy DM30, which both place a presumption on the retention of car park (although numbers of spaces are not defined), and London



Plan (2021) policies that places a presumption on a car free scheme or at very least a 'car lite' scheme.

- 9.134 At present the existing car park provides in the region of 166 car parking spaces. When the application was submitted 166 car parking spaces plus a motor cycle parking area were proposed. The GLA in their Stage 1 raised concern over the extent of such provision, given the conflict with London Plan (2021) policies that seek to minimise car parking provision. Extensive dialogue between the GLA/TfL/Network Rail and applicant, in an attempt to address those concerns, has occurred during the application. Following on from those conversations, the applicant revised their scheme to further reduce the extent of car parking on site. The proposal for determination would provide 125 commuter car parking spaces, 2 car club bays and 17 motorcycle parking spaces within the station car park. It should be noted that London Plan (2021) requires motorcycle parking space to be counted towards the maximum for car parking spaces (so totalling 144 car parking including motorcycle and car club).
- 9.135 GLA/TfL continue to raise concerns with the extent of car parking, suggesting that a further reduction is realistic and achievable, and that car park users have a reasonable alternative to driving to Purley Station (for example based on survey data collected by the applicant 24% of current users are within a 15 minute walk of Purley Station, a further 33% are within a 15-minute walk to their closest station, and 93% of all car park users are within a 15-minute cycle ride of Purley Station). TfL's position is that a lower car parking number would force those that are reluctant to change into a more sustainable mode of transport.
- 9.136 The applicants' position is that they wish to retain a sufficient level of car parking on site, pointing to historically high occupancy rates, with passengers overflowing into neighbouring car parks and on street. They forecast that parking demand could rise in the next 10 years to 175 car parking spaces, and therefore the proposed parking number is still a challenging step that will help facilitate a modal shift.
- 9.137 The question of reducing car parking quantum appears to be further complicated by the legal framework Network Rail, as a public body, have to act within. Network Rail has obligations under the Office of Rail and Road (ORR) Section 4 duties of the Railways Act to: 'protect the interests of users of railways services'.
- 9.138 Before land is disposed of, Network Rail are required to ensure, and provide evidence, that there is sufficient provision of services for users to access the railway – through parking and public transport. This includes consultation with stakeholders such as third-party railway operators, the Department for Transport and consumer organisations such as London Travel Watch, on what parking is appropriate, and take account of various Network Rail and external guidelines.
- 9.139 Guidance referred to by Network Rail has been reviewed by officers. The guidance is largely centred on the viewpoint that car parking provision at

stations is sustainable, as it still results in curtailing extent/distance of car journeys, deriving environmental benefits 'up stream' from the station.

- 9.140 Network Rail advise, based on consultation done to date with London Travel Watch and Govia Thameslink Railway (GTR) who are the relevant train operating company, that in the face of expected increase in demand, and based on other land disposal decisions, they are of the view it is unlikely that they will be able to obtain consent to dispose of the land if a lower parking number is provided. Officer's hold no evidence to contest Network Rail's advice.
- 9.141 The question of likelihood of land disposal, as matter of planning balance, is particularly relevant here as the site is allocated. Allocated sites make a key contribution to the borough's five-year housing supply. If a sufficient number of sites that are allocated become undeliverable, this could in turn result in our five-year housing supply being eroded, that could result in tilted balance being applied to decision making (as per paragraph 11(d) of the NPPF (2023)). A neutral balance where if the harms outweigh the benefits planning permission is usually refused, to a tilted balance where the harms should significantly and demonstrably outweigh the benefits in order for planning permission to be refused.
- 9.142 The applicant is proposing a review mechanism of the car park use. An occupancy count would take place every year, for a four-year period. A passenger survey would be undertaken twice, once prior to the two years and once prior to four years. Depending on the survey results and consent of stakeholders, a further reduction could come forward. The transport assessment sets out some options to reutilise the space if a reduction was needed, which include improvement to electrical cycle and other facilities for cyclists, for example changing rooms. The mechanism proposed by the applicant is relatively limited and weak, in part due to legislative process, but is of some benefit in finding a pragmatic solution. The process for this, alongside interconnected revised station travel plan is recommended to be secured through the S.106 legal agreement.
- 9.143 On the basis that the site is allocated, and that the allocation requires retention, then the proposed development would result in an improvement over the existing situation (i.e. a reduction) and giving regard to the benefits that the scheme derives (including the delivery of a cycle hub as outlined in paragraph 9.158 below), these factors outweigh the non-compliance with the London Plan (2021) (including relationship to other interlinked Croydon Local Plan (2018) policies).
- 9.144 The applicant has highlighted that money from the sale of the car park would be reinvested into the station and its approaches. Whilst this is actively encouraged, ultimately these are not secured through the planning application or associated S.106, so cannot be given any meaningful weight in the decision-making balance.

#### *Station Car Parking - Operation*

- 9.145 The station car park would be operated 24 hours a day, and be maintained by Network Rail, and would be for rail users. It is currently intended that it would operate through a pre booked system, with entry only possible through fob/key code. This would ensure that the car park use is secure and enforceable.
- 9.146 A car club has confirmed that the access arrangements are workable. The final car park management plan is recommended to be secured via condition.

*Station Car Parking – Electric Charging Provision*

- 9.147 There is no set standard for electric charging provision for railway station car parks within the London Plan (2021), with Policy T6.4 being for leisure uses the closest standard. Policy T6.4 requires all car parking spaces to be provided with electric infrastructure. Policy T6.4 does not define percentages in terms of active/passive provision that should be provided.
- 9.148 20% of the station car parking spaces will be installed with active parking charging provision, with all accessible bays being installed with active charging provision. Network Rail are proposing a 20% passive provision. The justification for the non-policy compliance that presumes some sort of ECV provision be applied to every space is unclear. A condition is recommended imposing policy requirements, i.e. 80% to be installed with passive provision and 20% active.

*Station Car Parking – Disabled Parking Provision*

- 9.149 London Plan (2021) Policy T6.5 non-residential disabled persons parking sets out the appropriate level of disabled parking applicable for a station car park. The policy requires 5% of total parking provision to be designated bays, with 5% enlarged.
- 9.150 The applicant would provide 5% blue badge bays, with no enlarged bays. Disabled parking bays are located at the south-eastern end of the car park, where there would be the shortest distance to the station. The offer, due to lack of enlarged bays, is not in compliance with policy, but would be an improvement over the current status quo (with no known disabled spaces in the 166-space car park). As such, refusal is not recommended on this basis. However, it is noted that space within the car park may be freed up by future reduction. The consideration of providing enlarged bays at this stage is therefore recommended and recommended to be secured through the legal agreement. All blue badge bays would have active charging provision, which is recommended to be secured via condition.

*Station Car Parking – Mitigation during construction*

- 9.151 The applicant states that during construction the station car park would be unavailable. They are looking at strategies to increase car parking provided on the opposite side of the station off Approach Road (for example installing decking), and potentially use of other car parks. This is a complex matter, due to Network Rail's extensive permitted development rights that limits LPA control, given many of the options lie outside of the red line, that the availability of car parks is not fixed with some of those car parks being explored for development/allocated for development, and that in policy terms, removal of car parking is encouraged to change behavioural patterns. However, to ensure that

this aspect of construction process is actively considered and communicated, further details are recommended to be secured by condition.

#### *Residential Parking*

- 9.152 The site has a Public Transport Accessibility Level of 5 (very good) and being located just outside of the edge of the Purley district centre, is close to a wide range of facilities and services. The site is located within the Purley Controlled Parking Zone (CPZ).
- 9.153 London Plan (2021) policy T6 states that car free developments (with exception of disabled parking provision) should be the starting point for all development proposal in places that well connected by public transport, and the absence of local on street parking controls should not be a barrier to new development.
- 9.154 The provision of a car free development, with exception of disabled parking spaces, given the high PTAL is supported. Residents' eligibility for parking permits is recommended to be restricted through legal agreement. A contribution is also sought to facilitate the potential expansion of the CPZ to the west/north, which if agreed, would further aid the transition to sustainable modes of transport.
- 9.155 London Plan (2021) Policy T6.1 Residential Parking on disabled parking requires a minimum 3% of dwellings to be provided with a car space, with a potential further 7% provided in the future. Seven disabled parking spaces would be provided on site for the residential use, which complies with the 3% requirement. It should be noted this was originally provided at 5% but was reduced following TfL's objection on car parking numbers. All seven bays will be provided with active electric vehicle charging provision. The M4(3) units within blocks A and B would have direct access to the blue badge spaces, whilst the ten M4 (3) units in blocks C and D would be made aware of their location during purchasing. A spread of M4 (3) units throughout the development is preferred, and therefore the proposed accessing strategy is on balance acceptable. The applicant has stated that they do not feel it necessary to provide a further 7%, given the high accessibility of the site, however, have highlighted the potential for additional disabled parking on Whytecliffe Road North.
- 9.156 At present there are 14 car parking spaces serving the existing terrace houses. The development would therefore result in net loss of 7 car parking spaces associated with the residential element. The removal of the dropped kerbs, and other highway works, are recommended to be secured through the legal agreement.

#### *Trip Generation*

- 9.157 The reduction in station car park capacity during the assessment of the application from 166 car parking spaces (as submitted) to 125 car parking spaces (plus motorcycling parking and car club), is expected to result in 20 to 54 less car movements a day. Car use generation from the residential element, given the car free nature is likely to be small (estimated to be between 8 to 27 car journeys at morning peak dependant on whether using adjusted census data or TRICS data to estimate). There is expected to be around 2 to 3 service

vehicles movement per hour. The development would not therefore generate notable traffic demand, which in turn could adversely impact the operation of the highway.

#### *Public Transport Impact*

- 9.158 The development is expected to result in 32 additional residents travelling to work by bus and 112 residents in the morning peak. Given the presence of 10 bus routes in vicinity of the development and the railway station has 10 trains per hour in either direction, the development would not have an unacceptable impact on the operation of public transport in the area.

#### *Car Club*

- 9.159 Croydon Local Plan (2018) SP 8.13 requires new development to contribute to the provision of car clubs and car sharing schemes. Table 10.1 requires on site car club/pool car club spaces for non-residential development to be provided at rate of 5% of all spaces, with minimum of 2 car parking spaces.
- 9.160 Two car club parking bays would be provided within the station car park, close to the entrance, meeting the policy requirement. This car club bay would also be installed to ensure that it has electric vehicle charging provision. This is recommended to be secured via legal agreement.
- 9.161 It is noted that Table 10.1 requires car club provision of 1 space for residential element. In this instance, it is preferable that the car club is provided within public station car parking to increase its use and long-term viability. The occupiers of the residential homes would have access to this car club for their use (with membership paid for an initial 3 year period where resident requests it) but it would also be available to members of the public.

#### *Residential Cycle Parking*

- 9.162 A total of 413 long-stay and 7 short-stay cycle parking spaces would be provided on site for residents, which complies with policy requirement set out in the London Plan (2021). 21 of the cycle parking spaces will be designed to accommodate larger cycles. Cycle parking is located at ground level throughout the development where it can be conveniently accessed and used. Short term cycle spaces are located adjacent to entrances as far as reasonably practical.
- 9.163 No cycle parking is proposed for the community use on the basis that there is low anticipated staff numbers. However, there are two Sheffield stand cycle parking immediately adjacent to the front of the entrance to community use, within the courtyard area. Whilst cycle parking provision in the community unit would be preferred, no objection is raised.

#### *Commercial/Station Cycle Parking*

- 9.164 As part of the railway car park provision, there would be a 101 cycle space cycle hub that is located at the centre of the site, adjacent to public car park lobby and public realm area. The cycle hub would supplement the existing 70 cycle parking spaces that are located adjacent to the front entrance of the station. The cycle hub would provide the following:
- 6x Oversized Cycles

- 20x Sheffield Stands
- 15x E-Scooters
- 60x Two tier/Upper tier Stands.

9.165 The cycle hub would help support the move to sustainable modes of transport. Purley station has relatively poor sustainable transport options, and this would represent a significant improvement of its facilities. Purley town centre was identified in the 'Biking Borough Study' July 2010, which was produced by 'Cycling Study Alliance', as a location where the provision of a cycle hub would likely have the greatest benefit. The cycle hub has the potential for forming part of a coherent cycle parking strategy (noting that Whytecliffe Road South forms part of London Cycle Network Route 23), that could benefit both the station and Purley town centre. Usage of the cycle hub would form part of the station car parking monitoring at 2 and 4-year intervals. The proposed cycle hub is a significant benefit in the development's favour. Further details, similar to that for the community use, are required to ensure that the cycle hub provides the benefits intended. These details, along with its provision is recommended to be secured through the S.106 legal agreement.

#### *Deliveries/Servicing*

9.166 Three loading bays are proposed for the development. Two are located fully within the site, adjacent to the access road on the north-eastern side of the development. These two bays would be responsible for servicing blocks C, D and E. The other loading bay is being created on Whytecliffe Road South, within a newly formed lay-by style loading bay, that would serve blocks A and B. The loading strategy along with loading bays' location will ensure the continued operation of Whytecliffe Road South during collection times for cars and cycles. TRICS data has been used to establish likely use (4 Ordinary Goods Vehicles and 34 Light Good Vehicle per day) thereby ensuring sufficient loading bay provision. Whilst the loading bay serving block A and B would partly compromise the pedestrian environment during times of collection of refuse, it would still be a substantial improved experience than the current status quo, given improved public realm and increased pavement width. A draft delivery and servicing plan has been submitted with the application, with a condition recommended to secure the final version prior to occupation.

#### *Waste and Recycling*

9.167 Capacity for 33,100 litres of general waste, 30,464 litres of dry recycling waste and 2,285 litres of food recycling are provided for within the ground floors of each block. The quantum of provision accords with the Council's guidance.

#### *Sustainable Transport*

9.168 Given that the development would be car-free, increased walking, cycling and public transport use is expected. The impact of additional development within the area, including the proposed development, is expected to require upgrades to existing services and therefore a sustainable transport contribution is to be secured in the s.106 agreement to mitigate the impacts of this scheme and secure improvements, to include highway and bus infrastructure.

- 9.169 A Healthy Streets Transport Assessment (TA) including Active Travel Zone (ATZ) assessment has been submitted to support the application in line with TfL's guidance. The Active Travel Zone Assessment outlines several ways in which the development meets Health Street's requirements whilst also proposing a number of mitigation measures to improve performance further. One of the significant benefits of the development in sustainable transport terms is the provision of public realm and street frontage, that would create an improved pedestrian environment, that is of benefit to residents but also significantly improves a key pedestrian route from the north/town centre to the train station. This improvement further encourages healthy active lifestyles and sustainable modes of transport.
- 9.170 Some of the improvements are already secured through other developments' such as provision of a bench/cycle stand in the area between Whytecliffe Road South and North, some are not feasible (for example moving a bus stop onto private land not in the applicant's ownership), or which could be implemented from sustainable contributions or CIL.
- 9.171 Draft residential travel plans and station car park travel plans were submitted with the application. The draft residential travel plan sets out a number of measures such as appointment of a Travel Co-Ordinator, who would promote sustainable modes of transport through measures such provision of residents' packs, display of notice boards, sending email/newsletters and three-year paid for car club membership (secured through legal agreement). In order to ensure that the identified modal shift is adequately supported, and barriers to uptake of more sustainable transport modes can be addressed, final separate residential and station travel plans and monitoring for five years is to be secured through the S.106 agreement. The residential travel plan is proposed to be monitored at 3 and 5 years.

#### *Construction Traffic*

- 9.172 A draft construction logistics plan has been submitted with the application to help mitigate the impact of the development during construction on both highway and amenity. Measures include entering considerate constructor scheme, appropriate FORS accreditation, noise reduction measures, dust mitigation measures, delivery restrictions outside of peak hours and staff travel plan. A final demolition and construction logistics plan is recommended to be secured via condition.

#### **Trees and Biodiversity**

- 9.173 Croydon Local Plan (2018) policy DM28: Trees, states that the council will not permit "*development that results in the avoidable loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area*". This is further expanded in G7 of the London Plan (2021). The NPPF (2023) recognises the important contribution that trees make to character and quality of urban environments and can also help mitigate and adapt to climate change. Decisions should ensure that new streets are tree lined (unless there are clear, justifiable and compelling reasons why this would be inappropriate), that appropriate measures are in place to secure the long-term

maintenance of newly planted trees, and that existing trees are retained wherever possible.

9.174 In line with the NPPF (2023), three new trees, consisting of two Acer and one Lime tree, are proposed to line the enlarged pavement area, to supplement the retained existing lime trees that currently front the car park area. The trees when planted would be between 3.5m and 4.25m in height, with 12 to 14cm girths. These proposed trees in their publicly prominent locations, would make a positive contribution to visual amenity, improving the context in which the development would be experienced in, whilst improving public realm and pedestrian environment, aiding the promotion of active travel.

9.175 Fifty trees and eighteen tree/shrub groups are located within the site or immediately adjacent to the site. There are broadly three tree groups, firstly those along the street frontage that are being largely retained as far as practical, secondly trees between the Purley Social Club and the north-eastern wing of the car park, and finally a group of trees that are located along rear boundaries of the terrace houses and south-eastern edge of car park. None of the trees are formally protected. In forming a balanced opinion of development, it is important to give weight to the fact that these trees could be removed without any consent or permission.

9.176 Thirty seven trees and eighteen tree/shrub groups would be lost as part of the proposal, two of which are category B, thirty one trees and eighteen groups are category C and four trees are category U. 39 Hedgerows and 34 shrubs would be also lost. Fifty three trees/tree groups (categories C and U) are of low quality or no quality, making little contribution to the character of the area, and any appropriate replanting scheme can compensate for their loss. The two category B Sycamore trees (T72 and T74) that would be lost are located between Purley Social Club and the north-eastern wing of the development. Their visual amenity, given their non street facing location and visual quality, is not such to merit being protected under a TPO. Their loss would facilitate meaningful development of the north-eastern corner, allowing the development to optimise the capacity of the site, and prevent this area being undesirable leftover land with limited purpose. Officers are therefore satisfied that their loss is justified.

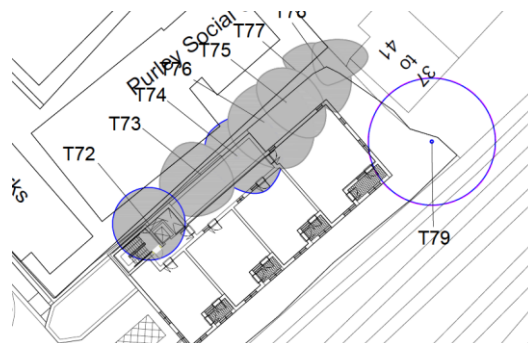


Figure 38 – Tree locations relative to proposed block E.

9.177 In addition to the three trees planted to the front of the site, sixty-seven new trees are proposed throughout the development. Furthermore, the applicant has agreed a contribution of £2,610 towards the planting and maintenance of



approximately 6 trees in the local area. Locations provisionally identified include:

- 4 no. trees opposite the Purley Leisure Centre
- 1 no. tree opposite the Purley War Memorial Hospital/facing Sainsburys Local
- 1 no. Astoria Court adjacent to the building

9.178 The proposed development would result in more trees being replanted than groups of/trees being lost. The proposed development, therefore, subject to condition has an acceptable impact on trees.

9.179 Policy G5 of the London Plan (2021) states that major development proposal should contribute by including urban greening. The London Plan (2021) set out that boroughs should develop their own urban greening factor, but in the interim suggest a target score of 0.4 for developments, which are predominantly residential. Policy G6 of the London Plan (2021) sets out proposals should manage their impacts on biodiversity and aim to secure net biodiversity gain.

9.180 The current Urban Greening Factor of the proposed development is 0.501, thus significantly exceeding London Plan's target. A condition is recommended to ensure the development delivers in line with this commitment.

9.181 A preliminary ecological appraisal report was carried out in March 2020 and December 2023. The latest survey identified that the existing terrace properties (26 to 52 Whytecliffe Road South) as having a low potential for roosting bats. Bat surveys were previously carried out in 2019, which found no evidence of roosting bats. Given the length of time since the 2019 surveys were conducted, updated nocturnal surveys in accordance with BCT survey guidelines are required to be carried out between May to August to re-confirm this remains the case. These surveys, as set out in paragraph 2.4, are recommended to be secured and considered prior to issuing of a decision by officers in consultation with an appropriately qualified ecologist, with appropriate mitigation and compensation measures secured via condition. In the unexpected and unlikely event that the council's appropriately qualified ecologist is of the opinion that conditions would not be sufficient to mitigate any harm identified, then Committee is requested to allow the Director of Planning and Sustainable Regeneration to refuse planning permission, or in the event the recommendation was still to grant planning permission, to return the application to Committee to receive a fresh resolution. Conditions are also recommended to control light, to prevent the development causing harm to forage and commuting bats.

9.182 The site broadly has a low ecological value, due to the absence of notable areas of habitat, other than habitats found widely in the surrounding landscape, such as vegetated gardens, scrubs and buildings. It is considered unlikely that the proposed development will impact great crested newts, reptile populations, badgers, hazel dormice, water vole/otters, or white-clawed crayfish. Common invertebrates are likely to be found on the site, but as the habits are common, the development is unlikely to have a significant impact on important populations of invertebrates. Recommendations are also made in regard to

nesting birds, and removal of scrub/shrub vegetation in order to avoid harm to hedgehogs that could be present, as well as removal of invasive species such as buddleia. The recommendations set out in the preliminary ecological appraisal report are recommended to be secured via condition. The proposed development subject to the procedures set out within the report and conditions, would ensure the adequate protection of protected species.

- 9.183 London Plan (2021) policy G6 requires that any development seeks to provide biodiversity net gain. The existing site with its large areas of hardstanding and residential gardens has limited biodiversity value. The applicant has submitted an Ecological Enhancement strategy which outlines the way in which the proposed development will seek to enhance the biodiversity value. The report recommends a number of mitigation/enhancement measures including the provision of bat boxes, swift nest boxes, house sparrow and invertebrate boxes, extensive green roofs, log piles, vegetated swales and extensive tree and shrub planting. The development also includes a biodiversity corridor along the rear boundary that will provide a pollinator route for bees and other insects, and introduction of wildflower species. Some of these features are indicatively shown on landscaping plans. Conditions are recommended to ensure the enhancement measures are incorporated into the final scheme, implemented and maintained so that they become established.

### **Sustainable Design**

- 9.184 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, of which 10% and 15% respectively for residential and commercial elements, achieved through the use of passive and energy efficiency measures, with the remaining CO<sub>2</sub> emissions to be offset through a financial contribution. The policy also requires major developments to be enabled for district energy connection unless demonstrated not to be feasible.
- 9.185 The energy strategy for the development is based on a well-insulated and airtight development that reduces the requirement for mechanical heating, utilising low carbon and renewable technologies (such as heat pumps and PV panels to blocks A to D) in the heating strategy, with the majority of the building naturally ventilated through openable window and/or trickle vents that help prevent overheating. Mechanical ventilation heat recovery will be used where this is not possible, for example in noise sensitive locations.
- 9.186 The residential element of the scheme is expected to achieve at least a 69% reduction in regulated carbon emission and up to 10% through a combination of energy demand reduction measures, thus meeting GLA targets. The commercial element of the scheme is expected to achieve at least a 15% through energy demand reduction, and up to 1225% taking everything into account including the utilisation of renewable energy, thus meeting/exceeding GLA targets. The commercial reduction percentage is high due to low relative emissions that this element of the development would emit. The remaining regulates CO<sub>2</sub> emission shortfall would be covered by a carbon offset payment

which would be secured through a S.106 Agreement. A total of 1,861 tonnes of CO2 would be required to be offset, amounting to a contribution of £176,823. Be seen obligations that require post completion monitoring, are recommended to be secured through the S.106 legal agreement.

9.187 The site is outside of any zone considered for a future heat network, so no conditions or legal clauses in regard to district energy are required.

#### *Circular Economy Statement and Whole Life Cycle Carbon*

9.188 Policy SI 7 Reducing waste and supporting the circular economy of the London Plan (2021), requires referable applications to promote circular economy outcomes and aim to be net zero-waste. This includes reusing/recycling of material from demolition, how the design and construction would reduce material demands and how waste/recycling would be managed as much as possible on site, adequately stored and managed in accordance with the waste hierarchy. The applicant has submitted a circular economy statement that sets out how the development would and could meet these objectives. Appropriate conditions are recommended.

9.189 Policy SL 2 Minimising greenhouse gas emissions of the London Plan (2021) criterion F requires development proposal referable to the Mayor to calculate the whole life carbon emission through a whole life carbon assessment.

9.190 A whole life cycle assessment has been submitted. It outlines a series of considerations to reduce carbon emission through selection of appropriate materials at detailed design stage, however, highlights that potential for significant reductions could be limited due to other considerations, such as structural and design issues.

#### *Water Use*

9.191 A planning condition is recommended to secure compliance with the domestic water consumption target of 110 litre/person/day, to ensure sustainable use of resources.

### **Impact on Surrounding Environment**

#### *Wind*

9.192 A desktop wind assessment of the impact on local wind conditions has been undertaken. During the windiest season, it is expected that the majority of the site including the pavement would have wind conditions suitable for standing, to strolling use during the winter, with betterment over an empty site scenario in the summer season, where conditions for sitting and standing use are expected. No strong wind conditions for prolonged periods (more than are expected to normally occur). The large communal gardens to the rear of the development would be suitable for sitting during summer. There are some upper floor balconies and terrace areas where wind conditions are windier than suitable for the intended use, however, these conditions can be improved through minor mitigation measures, such as balcony design/heights. Further details and implementation of these are recommended to be secured via condition.

### *Contamination*

- 9.193 A phase 1 Environmental Risk Assessment report was submitted with the application. The submitted report outlines that in general risk ranges between very low to moderate and recommends further site investigations to be carried out. A condition is recommended to ensure that further investigation and mitigation is carried out as required.

### *Air Quality*

- 9.194 Policy SL 1 Improving Air Quality of the London Plan (2021) states that development proposal should be at least 'air quality neutral'. The site is in an Air Quality Management Area (AQMA). An Air Quality Assessment and Air Quality Neutral Assessment has been submitted and is recommended to be secured via condition. The development would have a negligible impact on the surrounding area in terms of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. No mitigation measures are also required for new residents within the development to ensure acceptable air quality. In terms of Transport Emission and Building Emission the development would be classed as Air Quality Neutral, in line with policy.
- 9.195 The main air quality impacts would be from construction, which can be appropriately mitigated through routinely used methodologies, secured through condition. The Air Quality Assessment also confirms that National Air Quality Strategy (AQS) objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are likely to be met at the facades of the proposed development, and as such future occupants of the development would be exposed to acceptable air quality. In regard to communal external spaces, the aggregates site as part of their existing permit arrangement would need to ensure that the risk of dust on existing receptors is not significant. As there are already existing receptors closer to the aggregates site than proposed, the development and associated spaces would be protected by these existing measures. As such air quality within communal amenity spaces would be acceptable. A contribution towards air quality improvements to mitigate against non-road transport emissions is recommended to be secured via the S.106 agreement, and a condition is recommended to ensure that the construction impacts on air pollution are mitigated.

### *Flooding*

- 9.196 The site is located in Flood Risk Zone 1 as defined by the Environmental Agency, where the annual probability of fluvial and tidal flooding is classified as less than 1 in 1000 years. In terms of surface water, the site itself is at very low risk of surface water flooding, which amounts to a 1 in 1000-year flood risk. The site is located within the Purley Cross Critical Drainage Area. The site is also located within a High Groundwater Vulnerability Area, where there is potential for groundwater flooding to occur at surface.
- 9.197 The PPG states that '*the aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible (such as surface water flooding or ground water flooding)*'. The applicant in line with guidance has submitted a sequential test to show whether there are potential development sites with a lower probability of flooding that could be developed instead, to help meet the five-year housing supply. The site fails the sequential test as the council can

meet their five-year housing land supply on sites with a lower groundwater flood risk and also in Flood Zone 1.

- 9.198 The NPPF (2023) states that when it is not possible, following the application of the Sequential Test, for a development to be located in zones with a lower probability of flooding, the Exception Test should be applied. In order to pass the Exception Test the following must be met:
- a) It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a SFRA where one has been prepared; and
  - b) A site specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 9.199 The application complies with part (a) of the Exception Test. The development increases social provision through the delivery of further housing (31.7% of which would be affordable by habitable room), in a sustainable location close to local services and transportation links. There are some economic benefits, with employment opportunities being generated through construction that through the S.106 agreement would directly benefit local people and suppliers. New residents are likely to help the vitality of local shops and economy through the goods and services they purchase. There is also a community facility and significantly improved public realm that will support healthier lifestyles.
- 9.200 In regard to (b), a site specific Flood Risk Assessment has been submitted which correctly identifies the proposed flood risk and suggests appropriate mitigation measures that demonstrate that the development will be safe for its lifetime, without increasing flood risk elsewhere. Further details of mitigation measures are outlined below. The application passes part (b) and therefore passes the Exception Test.
- 9.201 Flood resilience and resistance measures are recommended to be incorporated in the construction of the lower ground and ground floor levels of the building including flood proof airbricks, damp proof membranes, raising of floor level 150mm above ground floor thresholds, installation of non-return valves, raised water, electric and gas meters, and raised electric sockets.
- 9.202 In regard to groundwater flooding, the development itself is not at significant risk from groundwater flooding, as long as appropriate mitigation is included. Borehole investigation has been carried out, which did not encounter significant groundwater levels. The layout of the site, in which car park and ancillary areas form the majority of lower ground floor levels helps provide a barrier to upper floor residential units. The FRA outlines that further ground investigations are required, to devise the finalised groundwater mitigation strategy. This is recommended to be secured via condition.
- 9.203 In regard to surface water flooding, the application has been reviewed by the Lead Local Flooding Authority (LLFA) who found the strategy outlined acceptable and accordance with policy. Infiltration is not feasible due to the site

being located in a groundwater source protection zone, as such controlled discharge into the surface water sewer is proposed. The discharge rate of 1.0l/s is proposed on the site, which represents a feasible discharge rate that allows self-cleansing of the system and is a approx. 92% betterment over the existing site performance. Rainwater butts, green roofs, permeable pavement, swale along the street edge and underground attenuation tanks are proposed to manage surface water. Conditions are recommended to ensure design is further developed, and to secure implementation.

- 9.204 Thames Water were consulted on the application, have advised they have no objection in regard to foul water and surface water capacity. They have not recommended the imposition of any conditions.

#### *Light Pollution/Light Glare*

- 9.205 Croydon Local Plan (2018) policy DM10.9 requires lighting schemes not to cause glare and light pollution. A Lighting Impact Assessment has been submitted which is appropriate and would ensure that the development would not cause excessive light pollution. Further details are also recommended to be secured in regard to light glare to ensure that development would not cause public safety issue, especially in regard to the operation of railway line. This is not expected to be a significant issue given the building materiality largely consists of brick that has low reflectivity, and as such resolvable by condition.

#### **Other Planning Issues**

- 9.206 In line with policy DM16 of the Croydon Local Plan (2018), the proposal will provide high standard of housing, which helps promote sustainable travel through the provision of policy compliant cycling offer and due to its appropriate location and would minimise car usage, would reduce flood risk through the integration of SUDS, has good access to health, social and retail facilities, open space, and would be environmentally sustainable. Local employment opportunities (in line with Croydon Local Plan Policy SP3.14), along with financial contribution towards construction phase, would be secured through the S.106. The proposal complies with Policy DM16.
- 9.207 A TV and Radio Signal assessment has been submitted with the application. The statement outlines there will be occasions when signal may be affected due to crane activity, but these are short periods and cannot be mitigated against. Once complete, due to good signal strength and limited receptors south/southwest of the site, the development should not have an adverse effect on local television. No further mitigation is required.
- 9.208 The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act. It sets out the different ways in which it is unlawful to treat someone. The legislation requires local authorities to fulfil a public sector equality duty by considering the impact of policies and proposals on people with protected characteristics. London Plan (2021) Policy GG1 Building strong and inclusive communities sets out that good growth is inclusive growth. It sets out a series of requirements to ensure this. The NPPF (2023), as well as Mayor's

Accessible London: Achieving an Inclusive Environment SPG and Mayor's Planning for Equality and Diversity on London SPG (2007) are also of relevance.

- 9.209 The applicant has submitted an inclusive design statement. The development proposes a number of measures that would improve inclusivity, including widening and improvement of pavements, variety of unit types including range of M4 (3) wheelchair units, with the remaining units designed to meet M4 (2) with communal amenity spaces also designed to be accessible. Fire evacuation lifts are provided to ensure dignified emergency exit. The station car park will be improved significantly under the development, improving its accessibility and safety, that will benefit all parts of the community. A community use is also proposed that will give meeting space for local groups and charities, with further details recommended to be secured to ensure that this facility is available to broad range of people as reasonably possible.
- 9.210 It is considered that the development proposals could have a negative impact on some protected groups, but only over a temporary period. There would be temporary negative impact on groups due to disruption in the area surrounding the site during the construction phase. However, suitable mitigation measures, secured through condition, will be put in place during the construction process to reduce the adverse effects on these groups as far as reasonably possible.
- 9.211 The proposed development is considered to have had due regards to inclusivity, diversity and equality, often improving the situation over the current status quo, with further mitigation measures recommended to be secured through condition to further reduce the likelihood or extent of impact of the development on individual protected groups where considered necessary. The proposed development meets the requirements of London Plan (2021) Policy GG1.
- 9.212 Croydon Local Plan (2018) policy SP3.14 and the Planning policy including the adopted Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy – Review 2017 sets out the Councils' approach to delivering local employment for development proposal. A financial contribution and an employment and skills strategy would be secured as part of the legal agreement.
- 9.213 The development would be liable for both Mayoral Community Infrastructure Levy (CIL) and Croydon CIL. The collection of CIL would contribute to provision of infrastructure to support the development including provisions, improvement, replacement, operation or maintenance of education facilities, health care facilities, and opens space, public sports and leisure, and community facilities.

## **10 CONCLUSION**

- 10.1 The proposed development, on a partially allocated site, would provide a large number of high quality homes, a significant number of which are affordable homes (at a viability deficit) on a highly sustainable brownfield site with very good access to public transport, local shops and services. The proposed development would provide a space that would be available for use by the

community for free for minimum of 20 hours week, that whilst not in line with policy, is of social benefit. The proposed development has a contextually responsive form and is of high architectural quality, with significantly improved public realm on a key pedestrian route to and from the station. The provision of the latter would encourage sustainable travel and active/health lifestyles both for residents of the development and beyond. The proposed development would improve sustainable transport options, through the provision of on-site car club and cycle hub. The development would result in a betterment of surface water flooding performance. Employment and training opportunities including appropriate proportion of which be made available to Croydon residents.

10.2 The positives of the scheme need to be weighed against areas of harm and policy non-compliance, notably a non-policy compliant quantum of three bed homes (although still a net gain), a technical breach of the Purley place policy height limitation, that the development causes less than substantial harm (at the lower end) to the non-designated heritage assets of Purley Train Station and Purley Local Heritage Area, a significant impact to neighbouring properties amenity (particularly their sunlight and daylight) and a station car park that whilst an improvement over the current status quo (and in line with policy allocation) insufficiently promotes sustainable and active travel by providing a large number of car parking spaces, whilst also not providing enlarged spaces in line with policy.

10.3 In officer's view the substantial benefits and positives of the scheme outweigh the area of harm and non-policy compliance. As such, planning permission is recommended to be granted as per the terms set out in the recommendation section above.

## **Appendices**

### **AP1: 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 (2021)**

- GG1 Building Strong and Inclusive Communities
- GG2 Making Best Use of Land
- GG3 Creating a Healthy City
- GG4 Delivering the Homes Londoners Need
- GG5 Growing a Good Economy
- GG6 Increasing Efficiency and Resilience
- SD6 Town Centres and High Streets



- 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
- D10 Basement Development
- D11 Safety, Security and Resilience to Emergency
- D12 Fire Safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing Housing Supply
- H4 Delivering Affordable Housing
- H5 Threshold Approach to Applications
- H6 Affordable Housing Tenure
- H7 Monitoring of Affordable Housing
- H8 Loss of Existing Housing and Estate Redevelopment
- H10 Housing Size Mix
- S4 Play and Informal Recreation
- E11 Skills and opportunities for All
- HC1 Heritage Conservation and Growth
- HC3 Strategic and Local Views
- G1 Green Infrastructure
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI 1 Improving Air Quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy Infrastructure
- SI 4 Managing Heat Risk
- SI 5 Water Infrastructure
- SI 7 Reducing waste and supporting the circular economy
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T1 Strategic approach to Transport
- T2 Healthy Streets
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car Parking
- T7 Deliveries, Servicing and Construction

## **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 DM8: Development in Edge of Centre and Out of Centre Locations
- Policy DM10: Design and Character
- Policy DM13: Refuse and Recycling
- Policy DM14: Public Art
- Policy DM15: Tall and large buildings
- Policy DM16: Promoting Healthy Communities
- 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 DM32: Facilitating Rail and Tram Improvements

### Place-specific policies

- Policy DM42: Purley

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

#### London Plan

- Planning for Equality and Diversity in London (October 2007)
- Play and Informal Recreation (September 2012)
- Sustainable Design and Construction (April 2014)
- Character and Context (June 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- Crossrail Funding (March 2016)
- Housing (March 2016)
- Affordable Housing & Viability (August 2017)
- Be Seen Energy Monitoring LPG (September 2021)
- Fire Safety LPG (February 2022)
- Urban Greening Factor LPG (February 2022)

- Circular Economy Statement LPG (March 2022)
- Whole Life Carbon LPG (March 2022)
- Sustainable Transport, Walking and Cycling (December 2022)
- Air Quality Neutral LPG (February 2023)
- Characterisation and Growth Strategy LPG (June 2023)
- Optimising Site Capacity: A Design-led Approach LPG (June 2023)
- Housing Design Standard LPG (June 2023)

#### Draft Documents

- Affordable Housing LPG (May 2023)
- Development Viability LPG (May 2023)

#### Croydon Development Plan

- Designing for community safety SPD
- SPG 12: Landscape Design

### **AP2: BRE 2022 Daylight/Sunlight 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 “NSL test” (no sky line).

#### 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

The vertical sky component (see above) may be used to calculate daylight into new buildings.

For daylight provision in buildings, BS EN 17037 provides two methodologies. One is based on target illuminances from daylight to be achieved over specified fractions of the reference plane for at least half of the daylight hours in a typical year. One of the methodologies that can be used to interrogate this data is Spatial Daylight Autonomy (sDA).

The Spatial Daylight Autonomy (sDA) seeks to establish how often each point of a room's task area sees illuminance levels at or above a specific threshold. BS EN 17037 sets out minimum illuminance levels (300lx) that should be exceeded over 50% of the space for more than half of the daylight hours in the year. The National Annex suggest targets comparable with the previous recommendations for Average Daylight Factor (ADF). The targets considered relevant for this application are:

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for living/kitchen/diners, kitchens, and studios.

Paragraph C17 of the BRE states that *“Where a room has a shared use, the highest target should apply. For example in a bed sitting room in student accommodation, the value for a living room should be used if students would often spend time in their rooms during the day. Local authorities could use discretion here. For example, the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design”*.

#### Sunlight to new buildings

The BRE guidelines state that in general, a dwelling or non-domestic building which has a particular requirement for sunlight, will appear reasonably sunlit provided that:

- At least one main window faces within 90 degrees of due south, and
- a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s); sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.

#### 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.