

PART 5: Development Presentations

Item 5.1

1. DETAILS OF THE DEVELOPMENT

Ref: 19/02988/PRE
Location: 443A Brighton Road, South Croydon, CR2 6EU
Ward: Purley Oaks and Riddlesdown
Description: Proposed redevelopment of the site to provide a residential led, mixed-use development comprising 75 residential units (C3) and 338sqm GIA of flexible commercial space (B1b, B1c and D1), with building heights ranging between 4 and 7 storeys, associated parking and landscaping, and all necessary ancillary and enabling works.
Applicant: Mr N Lawrence, Ironwood Works
Agent: Ms Lucy Howes, Icen Projects
Case Officer: Samantha Dixon

- 1.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent application, including any comments received as a result of consultation, publicity and notification.
- 1.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 1.3 The report covers the following points:
 - a. Site briefing
 - b. Summary of matters for consideration
 - c. Officers' preliminary conclusions
 - d. Specific feedback requests

2. EXECUTIVE SUMMARY OF KEY ISSUES WITH SCHEME

- 2.1 As existing the site is a car show room which is a sui-generis use. There is no protection of such uses in the Croydon Local Plan (CLP) and as such there is no objection to the loss of this use.
- 2.2 The site is within the Brighton Road Area of Focussed Intensification so the proposed residential development and active ground floor commercial frontage

is welcomed. CLP states that development in this area may be significantly larger than existing and should be double the predominant height of buildings in the area. The Suburban Design Guide says that development should seek to significantly intensify the area through the development of flats and increased heights. The height of new development should respond to the context and streetscene. Heights should therefore vary from 3 to 6 storeys. Officers are of the view that the proposal broadly accords with these requirements.

- 2.3 The application has been considered by Place Review Panel and the application has been amended to address the comments that were raised (discussed below). Officers current opinion is that the proposed bulk, mass and appearance of the development is generally acceptable, although some further amendments are required and discussions are ongoing with the applicant.
- 2.4 A policy compliant amount of affordable housing is proposed at a tenure mix that has been preliminarily agreed with a registered housing provider (30% of units by habitable room, at a 50:50 split of social rent to intermediate housing). The scheme provides policy compliant amount of family units and the accommodation for future occupiers is good.
- 2.5 At this stage officers are satisfied that the development can be accommodated without causing undue harm to the amenities of the adjacent residential properties, and without prejudicing the future development of the immediate commercial site on Brighton Road.
- 2.6 A Transport Statement has been provided and given the good access to public transport and services, officers are satisfied with the level of on-site parking proposed, as well as other mitigation measures.
- 2.7 The site is within Flood Zone 3 And a Flood Risk Assessment and Drainage Strategy has been provided. Consultation is ongoing with the LLFA.

3. SITE BRIEFING

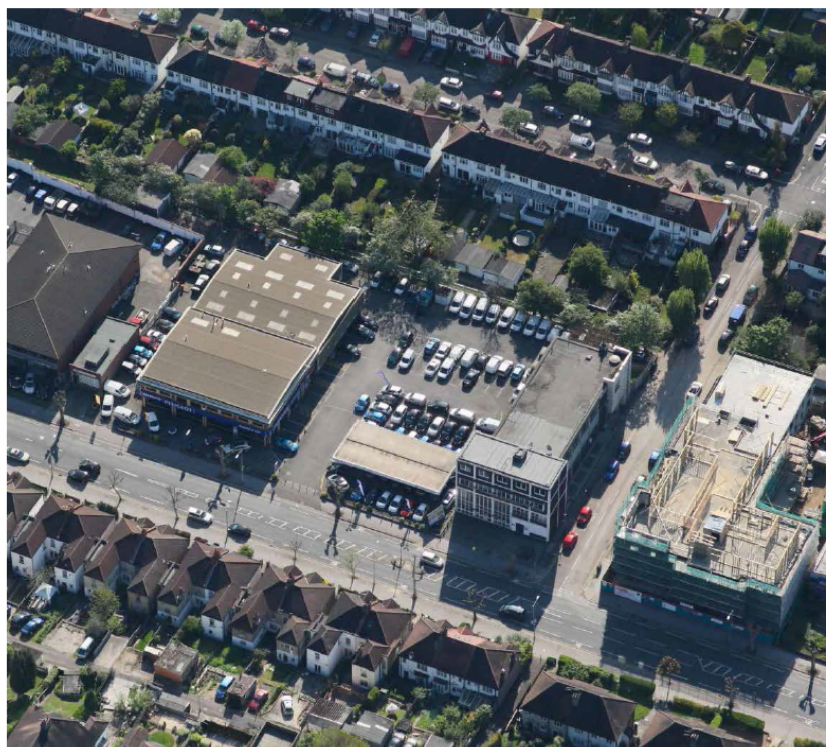
- 3.1 The site is located to the east side of Brighton Road and comprises a two storey car sales show room with ancillary repairs workshop and offices, and a vast amount of hardstanding for the display of vehicles. Directly to the north of the site is another car showroom and to the south a three-four storey building which accommodates a church/community facility. To the east of the site are two storey terraced dwellings located on Grange Road, and the opposite side of Brighton Road is also defined by two storey dwellings.



Figure 1 and 2: Ariel Images of site



Key
 — Site boundary



- 3.2 The site is located in an Area of Focussed Intensification as defined by the Croydon Local Plan (2018) (CLP) whereby new development may be significantly larger than existing.
- 3.3 The site is also located within Flood Zone 3 and within an Archaeological Priority Zone.

- 3.4 Brighton Road is part of the Strategic Road Network. The site has a PTAL of 3 (moderate). Despite this rating the site is well connected being a 2 minute walk from Purley Oaks Railway Station and 5 bus routes along Brighton Road. There is a parade of shops 80m from the site which includes a convenience store etc and the site is approximately 1 mile from Purley Town centre. It's also a 160m walk from South Croydon Recreation Ground.
- 3.5 The site is not within a Conservation Areas and there are no Listed Buildings within the site, or whose setting would be impacted by the proposed development.

Relevant Planning History

- 3.6 Planning permission was granted for the use of the site as a car showroom and workshop in 1988 (ref. 88/01739/P)

4 PROPOSAL

- 4.1 The proposal is currently for:

- Demolition of existing car showroom and ancillary buildings
- Proposed redevelopment of the site to provide a residential led, mixed-use, development comprising 75 residential units (C3) and 338sqm GIA of flexible commercial space (B1b, B1c and D1)
- The commercial use would be located at ground floor level fronting Brighton Road
- Service areas for the commercial and residential uses would also be located at ground floor level
- The first to seventh storeys would comprise the residential units. These would be accessed from two main cores with lift and stair access to all levels. All units would have private amenity areas.
- The building height ranges between 4 and 7 storeys
- The building has an 'L' shaped form, an area of landscaped private communal garden located to the rear which has a secondary pedestrian access from Allenby Avenue
- 25 parking bays are proposed within the site along an access road at the north of the site and to the rear of the building.

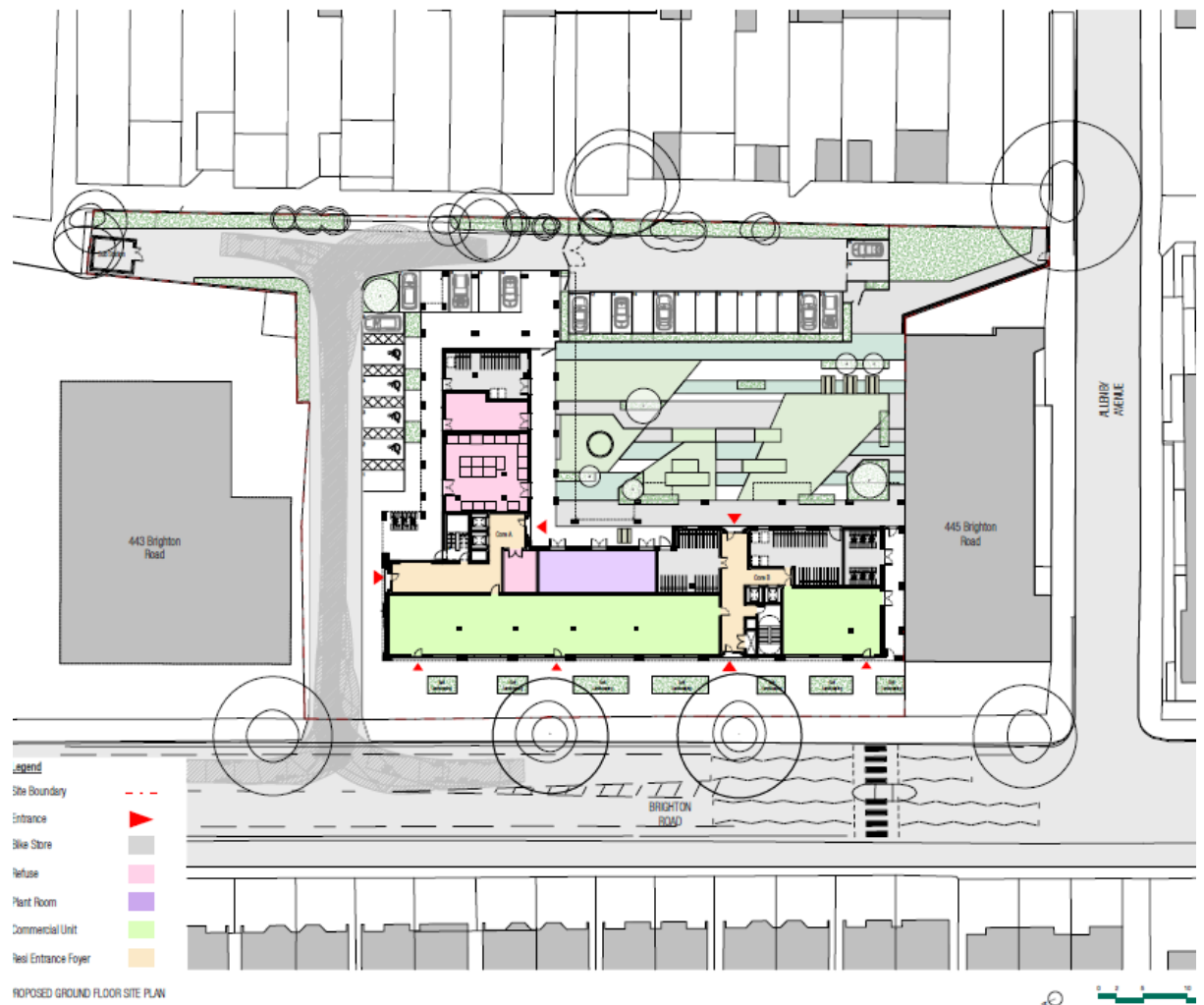


Figure 3. Proposed site layout plan

4.2 It is understood that the applicant is intending to submit their planning application imminently.

5 PLACE REVIEW PANEL (PRP) RESPONSE

5.1 The scheme was presented to PRP on 15th August 2019. Their comments on the emerging scheme were:

- The building line of the development should be set back to line up with the historic building line and give the important existing street trees the space they need to grow.
- The proposed height requires further townscape justification. Additional height may be acceptable.
- Public access into the development is not recommended.
- The colonnade at the front of the development is not acceptable.
- The stepping in of the south-western corner is not supported.
- There needs to be more certainty regarding the viability of the proposed commercial use of the ground floor. Maisonettes may be a more reliable way of ensuring active frontages.

- The development should be extended closer to the northern boundary.
- Exploration of relocating the car-parking along the northern frontage to the rear of the development.
- A continuous footway along Brighton Road is necessary.
- The entrances should be more prominent
- The landscape strategy requires further development
- The roofscape design requires development

6 SUMMARY OF MATTERS FOR CONSIDERATION

6.1 The main matters for consideration in a future submission are as follows:

- Land Use and the principle of development
- Affordable housing, housing mix and standards of accommodation for future occupiers
- Design and visual amenity
- Impact on neighbouring amenity
- Flood risk and sustainable drainage
- Highway and Parking
- Other Considerations

Land Use and the principle of development

Use

- 6.2 The site is currently in use as a car showroom and workshop which was granted permission in 1988 (ref. 88/01739/P). Policy SP3 (Employment) of the CLP outlines that the Council will adopt a '4-Tier' approach to the retention and redevelopment of land and premises relating to industrial/employment activity. Table 5.1 explains that the approach taken for scattered employment sites is to protect industrial and warehousing activities with allowances made for some Class B and community uses to locate in the more accessible locations.
- 6.3 It is understood that the site consists of a mix of uses including car sales area, showroom and a car repair/workshop, parts store, bodyshop and ancillary offices. The applicant views the use as Sui Generis (predominantly car showroom with ancillary workshops and office) and on this basis the use would not be protected as a Tier 4 site (which seeks to protect industrial and warehousing activity). As part of any formal application the applicant has been advised to prove that the whole site has a Sui Generis use (e.g. demonstrate that the workshops and offices are all incidental to the car showroom use), to demonstrate that it is not protected by Tier 4 status.
- 6.4 If the site is proven to be in Sui Generis use, it is not protected by Tier 4 status and therefore there is no policy requirement for a commercial use at the site. However, the site is located in an area of Area of Focussed Intensification which requires an active frontage to be provided and is also within Flood Zone 3 and

as such it is unlikely that residential use would be found acceptable at ground floor level.

- 6.5 Within Tier 4 sites, permitted uses include Class B1 (excluding B1a office), B2 and B8 uses, employment generating sui-generis uses and Class D1 (Education and Community Facilities). Planning permission for residential development will also be acceptable if it can be demonstrated that a) there is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and b) residential use does not harm the wider location's business function.
- 6.6 338sqm of flexible commercial and community space (B1b, B1c and D1) is proposed, which is acceptable in policy terms in this location. The applicant has been asked to demonstrate that there would be an end user for a B1b and c, or D1 use, as the Council (and applicant) would need to be satisfied that the completed commercial space does not sit empty in the long term.
- 6.7 The proposed loss of a 'sui generis' use and introduction of a residential led, mixed-use, development comprising of 75 residential units (C3) and 338sqm GIA flexible commercial or communal space (B1b, B1c, D1) is likely to be acceptable in principle.

Area of focussed intensification

- 6.8 The site is located within the Brighton Road (Sanderstead Road) Intensification Area, as outlined within Policy DM10.11 of the Croydon Local Plan (CLP) and Chapter 3 of the Suburban Design Guide (SDG) 2019.
- 6.9 Section 3.11 of the SDG outlines that redevelopment in the Intensification Area should deliver increased housing density, supported by an active and vibrant local centre of mixed uses and recreation areas in conjunction with the existing recreation ground. Section 3.14 further states that large, underutilised sites provide potential for the creation of mixed-use developments. These may include active frontages along Brighton Road, with associated public realm improvements. Development should seek to significantly intensify the area through the development of flats and increased heights. The height of new development should respond to the context and streetscene. Heights should therefore vary from 3 to 6 storeys. Development facing onto Brighton Road may seek to be up to 6 storeys tall.
- 6.10 Policy DM10.11 of The Local Plan 2018 further outlines that new development in areas of focussed intensification may be significantly larger than existing and should be double the predominant height of buildings in the area. Development should further take the form of one of three different character types; "Medium-rise block with associated grounds", "Large buildings with spacing", or "Large buildings with Continuous frontage line".
- 6.11 The proposed development would consist of a 4 - 7 predominately 4 and 6 storey building, with a 7 storey element to the north west corner facing Brighton Road. The immediately adjacent site to the south, No. 445 consists of a 3 - 4 storey building, with the frontage to Brighton Road, 4 storeys. The site beyond this is a

residential development of four storeys. The adjoining site to the north is a two storey development and the properties to the west side of Brighton Road and on Grange Road to the rear of the site are two storey semi-detached dwellings. Whilst the scale of built form is varied, the predominant height is therefore 2 storeys.

- 6.12 The proposed height of the development would comply with the Local Plan policies surrounding Intensification Areas. Whilst the proposed development would partly exceed the height guidance within the Suburban Design Guide at its north west corner, given the varied scale, height and massing of the immediately adjacent buildings, particularly to the south, officers raise no objection to this in principle, subject to satisfaction of all other relevant planning considerations. An increase in height on the corner is desirable in urban design terms.

Affordable housing, housing mix and standards for accommodation for future occupiers

Affordable housing

- 6.13 CLP Policy SP2.5 states that to deliver affordable housing in the Borough on sites of ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rents homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified. CLP Policy SP2.5 requires a minimum provision of affordable housing to be provided either:

a) Preferably as a minimum level of 30% affordable housing on the same site as the proposed development or, if 30% on site provision is not viable;

b) 15% if the site is in the District Centre and 15% affordable housing on a donor site with prior planning permission within the same place as the District Centre; or

c) As a minimum level of 15% affordable housing on the same site as the proposed development, plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on site provision is not viable and construction costs are not in the upper quartile.

- 6.14 The applicant is offering 30% affordable housing on site on a habitable room basis (24 units) with a 50/50 split between social rent and shared ownership. The mix of affordable units proposed is 12 x 1beds and 12 x 2bed 4P.

- 6.15 A full viability appraisal has been provided which concludes that the provision of affordable housing of this amount is unviable and that the developer will incur a deficit. However, the applicant is prepared to deliver the scheme with the policy compliant amount of affordable rooms as set out above. The applicant has confirmed that they have a provisional agreement in place with a registered

provider who have confirmed their acceptance of the proposed affordable mix and tenure split.

- 6.16 At this stage the appraisal has not been assessed by an independent viability consultant. If more affordable housing can be delivered by the scheme it could be accommodated by reason of the split of units across two cores.
- 6.17 The level of affordable being offered would comply with policy requirements as set out in Policy SP2.5 and the agent has confirmed that a provisional agreement has been made with a Registered Provider to take on the affordable units. The delivery of affordable housing is clearly a very important consideration. The developer has committed to providing at least the policy compliant minimum of affordable housing. The scheme viability now needs to be reviewed at pre-application stage before officers can reach conclusions on the acceptability of this element of the scheme, or the scheme overall.

Housing Mix

- 6.18 Policy SP2.7 seeks to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings is 60% in areas with this PTAL level (PTAL 3). The policy allows exceptions to this where a registered provider confirms the housing mix meets their requirements and 2bed 4person units can be considered family units where supported by viability information.
- 6.19 The proposed scheme of 75 units provides 6 x 3 bedroom 4 person units (8%), 39 x 2 bedroom 4 person units (52 %) and 30 x 1 bedroom 2 person units (40%). The number of three bedroom units falls significantly below the policy requirement however including 2B4P units the scheme provides 60% family units, which meets the policy requirement for this type of area (urban setting with PTAL of 3).

Quality of Residential Units

- 6.20 All the proposed residential units meet minimum floorspace standards set out in the London Plan. The Mayor of London Housing SPG advises that developments should minimise the number of single aspect dwellings, and that north facing units should be avoided. During the course of the pre-application process, the layout has been amended to include an external decked access to the rear units which ensures there are no single aspect north facing units. There are a number of single aspect units with in the scheme (31). The positioning and orientation of the site and the layout of development is considered the most appropriate to maximise development whilst not causing harm the amenities of adjacent properties and in design terms. As such a number of single aspect units would always need to be provided. The units would receive good levels of privacy and outlook.



Figure 4. Typical floor plan

6.21 A Daylight, Sunlight and Shadowing Report has been provided. The internal daylight adequacy analysis illustrates that over 95% of rooms would satisfy the BRE guidelines for daylight. A small proportion of rooms would not achieve the internal daylight adequacy target criteria (mostly bedrooms which are considered to be less important in this regard). In terms of sunlight, 50% of the main living room windows satisfy guidelines (please note only the first floor units have been modelled and therefore the assessment provides a worst case scenario). The deficits are partly a result of the inclusion of winter gardens which limit direct access to light to some windows of the rooms, as well as overhead private amenity for units on upper levels. The frontage of the site faces north west and the logical layout of development to maximise the development potential of the site requires the proposed units to front the highway meaning that the layout is somewhat unavoidable. The primary main gardens/amenity space at ground level within the site will comfortably satisfy the BRE guidelines for sun on ground. Based on the site constraints (orientation and benefits of winter gardens), in officer's opinion, some sunlight infringements are likely to occur and do not necessarily make the scheme unacceptable but further testing is required to quantify this and ensure all mitigation has been undertaken.

6.22 All units have their own private external amenity space in the form of balconies or winter gardens. The amenity space for the units facing onto Brighton Road have been designed as winter gardens to minimise noise disturbance and

pollution to the future occupiers from the heavy traffic on this main thoroughfare. The majority of private amenity areas exceed or meet the required standard however a number of the winter gardens facing Brighton Road fall under the minimum requirements (no.16). The related units all exceed the minimum technical internal floor space and therefore there is scope with the existing footprint to provide amenity area that accord with planning policy requirements for all units. This needs to be addressed for officers to support the scheme.

- 6.23 There would a generous communal garden of approximately 700sqm within the enclosed area provided to the rear of the building. The communal space would benefit from good sunlight and would be well overlooked by the proposed development. It also serves a gated pedestrian access to and from the site to Purley Oaks train station. Integrated play areas for different ages and abilities amounting to approximately 271sqm have been included within the shared garden (policy requirement for the mix and tenure proposed is 167.7sqm). Officers welcome this approach. Further design work is required on the landscaping strategy, biodiversity and the relationship of the communal amenity area and the parking area.
- 6.24 The London Plan Policy 3.8 and the London Housing SPG Standard 11 requires 90% of the dwellings to be Category 2 'accessible and adaptable' M4(2), with the remaining 10% of the dwellings designed to be Category 3 'wheelchair user dwellings' M4(3). Two lifts are proposed in each stair core. 8 units (10.6%) are shown to be wheelchair accessible.

Design

- 6.25 Following the SDG recommendation that *'redevelopment in the Intensification Area should deliver increased housing density'* the proposed quantum of development and density is likely to be acceptable. As stated above, The SDG states that the height of new development should respond to the context and streetscene and suggest that heights should therefore vary from 3 to 6 storeys and that development facing onto Brighton Road may seek to be up to 6 storeys tall. Policy DM10.11 of The Local Plan 2018 further outlines that new development in areas of focussed intensification may be significantly larger than existing and should be double the predominant height of buildings in the area. Development should further take the form one of three different character types; "Medium-rise block with associated grounds", "Large buildings with spacing", or "Large buildings with Continuous frontage line".
- 6.26 The proposed building predominantly has a height of 6 storeys. Towards the rear (north east) of the site, the massing is reduced to 4 storeys, to respond to the local context of two-storey terraced houses on Grange Road. The corner point of the building comprises 7 storeys, which is one storey taller than the SDG recommended height along Brighton Road. This element is situated in a corner position and has a small footprint in comparison to the overall scheme. Given the height and massing of the immediately adjacent buildings, particularly to the south, it is considered that this element is successfully incorporated into the wider streetscene contributing to the current and emerging character of the area. The Place Review Panel (PRP) suggested that additional height could be

incorporated on the corner however the applicant has not followed this suggestion to ensure the proposal accords as far as possible with policy requirements. Members' views on this are sought.

- 6.27 The buildings to the north and south of the site on the eastern side of Brighton Road vary in height but predominantly have flat roofs and are constructed of varying external materials. In this context, officers feel that the proposed flat roof form sits comfortably and appropriately. External materials of buildings also vary considerably, some the buildings having commercial appearances and some finished in materials which are considered to detract from appearance of the public realm, including the block immediately to the south and the timber cladding found on the building to the southern side of Allenby Avenue. Brick can be found in the elevations of the residential properties on the eastern side of Brighton Road and in officers' opinion are a durable material that provide a good quality finish to the proposed building.



Figure 5. Visual of Brighton Road frontage



Figure 6. Visual of rear elevation and communal garden

- 6.28 The building has been laid out in the site with an 'L' shape form. This development along with the existing community building to the south create a horseshoe layout with communal space at the heart. The building footprint has been designed to ensure that the development does not prejudice the development of the adjacent sites in the future. The communal building could be redeveloped for residential purposes and share the communal garden space. The proposal provides a vehicular access that could be shared with the site to the north and the layout does not prevent this site from being developed in a similar fashion.
- 6.29 The layout allows the Brighton Road frontage to be activated with commercial uses at ground level with residential above. The servicing for the development is contained to the rear of the site (not viewable in the public realm). The layout allows a quality private communal garden to be provided for residents. This layout allows a footpath to be provided from the communal space to Allenby Avenue which provides quick access to the railway station.
- 6.30 Brighton Road has a wide footpath to the front of the buildings which contains mature and attractive street trees. As initially submitted, the proposed front building line sat forwards of the established historic building line and encroached into the canopy of the trees. The PRP were strongly of the opinion that the development should be set further back to align with the existing building line to help integrate the development with the neighbouring development and give coherence to the street scape. This would also ensure the trees are retained with space to grow. The applicant has undertaken this amendment, the building now aligning with the adjacent buildings.
- 6.31 At ground floor level, a colonnade was initially proposed along Brighton Road. The PRP did not support this approach as there is no precedent for such a feature in the local context, the covered walkway would hide the ground floor commercial units of the building and could also attract anti-social behaviour. The

applicant has therefore removed the colonnade from the scheme. The commercial units directly front the highway creating an active frontage to the street scene as required by Policy DM10.11. It is considered that the frontage of the commercial units should be further developed to clearly distinguish between the commercial and residential uses with space for signage. The wide pavement would be retained and the public realm would be enhanced with soft landscaping planters.

- 6.32 There are two cores to the building with two residential entrances; one on the Brighton Road frontage and one to the northern side. These entrances have been emphasised using recessed brick detailing which officers consider to be welcoming and attractive features of the scheme.



Figure.7 Visuals of the residential entrances

- 6.33 Refuse/recycling and cycle stores and the plant room are also found at ground floor level. Covered walkways are proposed to the side and rear elevations which provide shelter to and screen these service areas from being overly dominant. In the elevations facing the communal garden, to prevent these service areas from having an unappealing presence, large glazed openings facing the internal green space are featured in the store facades to animate the blank walls. White brick is proposed to be utilised to brighten these spaces. It is considered that further work is required to ensure these areas are secure as currently the scheme does not provide any natural surveillance of these areas.

- 6.34 In terms of massing, officers and the PRP are supportive of the general approach taken. The development has a simplified form, with clearly defined volumes. Officers consider this form to work well having a strong visual appearance. The south west corner of the building is stepped back which has a weaker visual appearance, accentuated by small windows, however as this is set behind the adjacent building line could be acceptable. Officers suggest this part of the development is further considered. The windows in this part of the building are unduly small in comparison to the rest of the building and enlarging them would enhance the overall cohesiveness of the building.

- 6.35 The northern elevation slightly differs in character from the other elevations as comprises decked access to the residential units in order to prevent and north facing single aspect units. Officers are of the opinion that this adds interest to the elevation and the landscaped areas along the external accesses successfully green the elevation. The material palette and size of window openings follows that of the rest of the building.



Figure 8. Proposed northern elevation

6.36 The material palette consists of two principal materials; multitonred red brick as the main cladding material and light coloured brick for ground floor and recessed walls, including balconies and external walkways. The brass colour for window frames and railings creates an interesting palette against the light and red brickwork.

6.37 The roof of the building would be visible from the ridge opposite the site to the west (Mount Park Avenue, Blenheim Park Road and Kingsdown Avenue). The majority of the roof would be used to accommodate solar PV's which, whilst the necessity is understood, does not create a very attractive townscape. The appearance of this roofscape should be enhanced as far as possible and officers suggest this element requires further development. The rear most element of lower roof is shown as an 'ecology flat roof' and further details of this area should be provided as part of any formal application.

6.38 At this stage officers are of the opinion that the design is mostly acceptable however some issues have been raised as outlined above which officers are having ongoing discussions about with the applicant. It is expected that these issues will be addressed and resolved as part of future negotiations. Members' views are sought.

Impact on Amenity of adjacent properties

Residential dwellings on Grange Road

6.39 The dwellings on Grange Road are located to the east/south east of the site. The rear gardens of these dwellings are approximately 20m long and many have detached outbuildings at the rear end. Many of these are garages which are accessed via a vehicular track from Allenby Avenue.

- 6.40 The rear element of the scheme (north east) closest to these dwellings is limited to four storeys in height to prevent the development from appearing visually intrusive or overbearing from the rear gardens. Given the location of the existing access track and garages, the proposed parking area would not be overly prominent from these gardens and it is noted that the current commercial use on site uses this area for the storage/display of vehicles.
- 6.41 The development would be located approximately 10m from the rear boundary of these dwellings at its closest point and therefore approximately 30m from the rear windows. This distance is great enough to ensure that the proposal would not cause any significant loss of privacy, in accordance with SDG guidance. There are no balconies proposed in the nearest elevation to respect the neighbouring properties as far as possible.
- 6.42 Given the location of the mass of the development in comparison to the dwellings on Grange Road, the submitted Daylight, Sunlight and Shadowing Assessment demonstrates that the proposal is unlikely to cause harmful loss of light.

Residential dwellings on Brighton Road

- 6.43 Whilst the dwellings to the west side of Brighton Road are also two storey, their relationship with the development site differs in that they front the busy main road which generally has a far less residential character. The outlook from the frontage of these dwellings facing the site is of this busy thoroughfare and the existing commercial units to the eastern side of Brighton Road. As such, outlook from these dwellings is unlikely to be harmed by the proposal.
- 6.44 The front of these dwellings face the public realm and therefore concerns regarding loss of privacy are less relevant. Notwithstanding this, these dwellings are located 24m from the front site boundary (approx. 30m from the front elevation of the proposed building) and as such a sufficient distance to ensure there would be no harmful loss of privacy.
- 6.45 A Daylight, Sunlight and Shadowing Assessment has been provided. In terms of impact on daylight, 6 rooms in 6 different properties would not satisfy the daylight tests for vertical sky component (VSC) and no-sky line (NSL) indicating that these rooms will be adversely affected. These rooms are living areas and bedrooms. The Average Daylight Factor (ADF) however shows that the retained light in these rooms will achieve the required target and therefore despite the reductions, the amount of retained light will remain adequate. In terms of sunlight, 94% of windows meet the Annual Probably Sunlight Hours (APSH) requirement, the only infringements being to one side of the existing bay windows. The dwellings will retain good levels of sunlight. The overshadowing analysis illustrates that the neighbouring amenity spaces will achieve the BRE criteria in shadowing terms.

Adjacent commercial/community sites

- 6.46 The proposed development should not prejudice the ability of these sites to be developed in the future. The access and parking arrangement has been arranged with this in mind. During the pre-application process the access and parking

arrangement has been altered to allow for the access to this development to be able to also be used by the site to the north to prevent the need for separate accesses to be required onto Brighton Road, which may need to be secured through the planning permission. Distances to boundaries and location of openings have been designed to ensure future development can come forward in a similar fashion. Indicative drawings showing how the adjacent sites could be developed have been submitted.



Brighton Road Elevation of proposal and potential future developments



Aerial view of proposal and potential future developments

Figure 9: Images of proposal and potential future development of the adjacent sites.

Noise

- 6.47 The impact of noise activity from any commercial activity will need to be considered as the applicant develops the scheme. The most likely protection would be in the form of conditions that control aspects such as hours of operation. The noise levels from any air handling units, mechanical plant or other fixed external machinery will also be expected not to increase background noise levels when measured at the nearest sensitive residential premises. In effect, this means the noise levels from any new units will need to be at least 10dB below existing background noise levels. In terms of light pollution, the development will be expected to comply with guidance contained within '*Guidance Notes for the Reduction of Obtrusive Light GN01:2011*'. The development would need to be constructed in accordance with the Councils '*Code of Conduct for Construction Sites*'.

Flood Risk

- 6.48 The site is within Flood Zone 3. The proposal would provide a more vulnerable use in an area susceptible to flooding. The applicant has provided Flood Risk Assessment (FRA) and Drainage Strategy. The FRA outlines that Finished Floor Levels (FFLs) of the proposed ground floor commercial units would be set a minimum of 150mm above existing floor level. This would raise the residential accommodation (which sits at first floor level) above the residual flood level. Therefore safe refuge is afforded to the residential development. The occupants of the commercial units will be provided access to the upper floors via the staircases, within the building cores. In terms of sustainable drainage, storage will be provided in SuDS options for this site in the form of living roofs, permeable paving, a geocellular attenuation tank (option1) or soakaway (option 2) and a proprietary SuDS feature in the form of a downstream defender, if required.
- 6.49 The LLFA are yet to provide comments on the submitted information. This is a matter to be resolved and finalised during the pre-application process as is the view of the Environment Agency.

Highways and Parking

- 6.50 The site is located on the Strategic Road Network and is located in an area with the PTAL level of 3 (moderate). The site is within close walking proximity of bus services (4 routes) on Brighton Road which provide an average of 23 services per hour. The site is within short walking distance (0.3km) from Purley Oaks Railway Station and 1.6km from Purley Town Centre. Brighton Road is generally level and has cycle lanes and the site therefore has good cycling opportunities for future residents/users. There are local shops almost directly opposite the site on Brighton Road. Despite the moderate PTAL rating, the site is very well connected to public transport and local shops and services.
- 6.51 The number of trips expected to be generated by mode by the proposed scheme has been calculated using the TRICS database. Given the existing use of the site, the analysis finds that the development would have an immaterial impact on the operation, capacity or safety of the local transport networks. Officers will fully consider this at application stage.
- 6.52 Access arrangement – The site currently has two dropped kerbs onto Brighton Road. The southernmost access is currently in use by the car showroom business. The northern access is blocked by metal bollards and not currently used for vehicular movements. The southernmost crossover would be stopped up and the northern access reinstated and widened/improved to provide the only vehicular access for the new development.
- 6.53 The London Plan sets out maximum car parking standards based on public transport accessibility levels and local character. For residential developments, 1-2 bedroom units should provide less than 1 space per unit and 3 bedroom units up to 1.5 spaces per unit. For commercial uses, provision should be made of 1 space per 100-600sqm of GIA.

- 6.54 On-site parking provision is provided at a rate of 25 spaces including 4 spaces for disabled bays, all for the residential element of the scheme. The commercial element is proposed to be car free.
- 6.55 Analysis of Census Ward data for Purley suggests that a development of this size and mix could potentially generate parking demand from occupants of up to 42 vehicles. This means that as a worst-case scenario there could be potential overspill of 17 vehicles onto the surrounding road network. Parking stress surveys have been carried out which have recorded maximum overnight parking stress to be between 78-85% which equates to 67 - 99 spare spaces within 400m of the application site. Daytime surveys have also been taken which record stress to be 80 – 90% equating to 43 – 87 spaces available. Whilst this represents a snapshot in time, it demonstrates that there is capacity on the surrounding highway to accommodate any potential overspill vehicles from the development.
- 6.56 The amount of parking provision needs to be carefully considered given the good level of connectivity of the site, which is in an area where sustainable travel options should be fully promoted. Mitigation measures are also proposed by the applicant; a Green Travel Plan would be implemented, a car club bay considered, and the applicant is willing to provide contributions towards the introduction of a CPZ in the vicinity of the site, or a study to determine the need for this.
- 6.57 Given the public transport opportunities in the area, it is acceptable for the commercial element to be car-free if a high quality Travel Plan with a package of sustainable measures is provided
- 6.58 Local Plan Policy DM30 states that 20% of parking bays should have Electric Vehicle Charging Points (EVCP) with future provision available for the other bays. The Transport Assessment states that 20% of the car parking spaces would have electric vehicle charging points and the remaining 80% would have passive provision (in accordance with draft London Plan requirements).
- 6.59 The Draft London Plan States that there is a requirement that disabled parking is provided for 3% of dwellings from the outset, with an additional 7% which could be provided if needed in the future. Four of the parking bays (5% of the units) are Blue Badge bays all with step free access from the main building which would be provided from the outset of the development. On balance this arrangement is considered likely to be acceptable, the remaining 5% (4 bays) could be provided on street if there is future demand.
- 6.60 In terms of the cycle parking provision the London Plan requires a minimum of 139 spaces for the residential element and a minimum of 4 spaces for the commercial element. Residential provision will include 144 long stay cycle parking spaces and 6 short stay for visitors and commercial provision will include 12 cycle parking spaces in total. Electric sockets will be provided for ebike charging and space for a small number of inclusive bikes such as tricycles, hand cycles and cargo bikes (i.e. at least 5 per cent of all spaces will be capable of accommodating a larger cycle). The cycles would be stored within the envelope of the building for the residential element in excess of the required amount. The Transport Statement also states that visitor cycle parking provision would be

accommodated along the Brighton Road frontage for the benefit of the commercial units.

- 6.61 Refuse for the residential and commercial elements would entirely be stored within the envelope of the building. Refuse vehicles would be able to access and manoeuvre within the site and collect the refuse within the site off of Brighton Road. Other service and deliver vehicles would be able to manoeuvre in the same way. The scheme has been designed to enable all servicing activity within the site in order to minimise any impact on the local road network. Some further work is required regarding the location of bin stores and how the commercial elements integrate with the residential areas.

Other Considerations

- 6.62 There are mature London Plane street trees to the front of the site on Brighton Road which are very mature and greatly enhance the appearance of the street scene. A tree survey and tree protection plan has been provided which shows that the development would be located outside of the root protection area of these trees and that the trees would be protected during development.
- 6.63 The site is entirely covered in hard surfacing and therefore the proposal creates the opportunity to greatly improve the landscape quality of the site. The landscaped communal garden is strongly welcomed and additional soft landscaping is proposed in the proposal parking areas.
- 6.64 Major residential schemes are required to meet Zero carbon. Non-residential buildings should achieve a 40% carbon dioxide emissions reduction over the Target Emissions Rate (TER) set out in the Building Regulations (2010). The London Plan Sustainable Design and Construction SPG (2014) sets out that this is broadly equivalent to a 35% reduction over the 2013 Building Regulations Part L, which is the most up-to-date standard. New build non-residential developments of 500sqm or above will be expected to achieve a minimum of BREEAM Excellent.

Mitigation

- 6.65 At this stage it is envisaged that planning obligations will be required to mitigate the impacts, with the following Heads of Terms:
- Affordable housing (30% on-site at 50/50 split)
 - Employment and training (contribution and commitments both construction and operation)
 - Air quality contribution (£500 per unit)
 - Zero carbon off-setting (if required, dependant on energy strategy)
 - Car club bay in vicinity of the development with first 3 years operating costs and membership for all occupants
 - Car parking permit free for future occupiers (if required)
 - Highway s278 works including contribution towards implementation of CPZ in and around the site
 - Travel Plan monitoring

7. PRELIMINARY CONCLUSIONS ON KEY ISSUES

- 7.1 The proposed development would result in the loss of a non-protected sui-generis use (car show room) and there is no policy objection to this. The site is within the Area of Focussed Intensification whereby the proposed residential development and an active ground floor commercial frontage is welcomed.
- 7.2 An affordable housing offer which complies with the policy minimum is proposed at a tenure mix that has been preliminarily agreed with a registered housing provider. Further testing is required to be satisfied with the affordable housing provision. The scheme provides a policy compliant amount of family units and the accommodation for future occupiers is good.
- 7.3 Overall the proposed bulk, mass and appearance of the development is acceptable. The detailed design of the development has progressing in an appropriate manner and discussions are ongoing.
- 7.4 The development can likely be accommodated without causing an undue harm to the amenities of the adjacent residential properties, and without prejudicing the future development of the immediate commercial site on Brighton Road.
- 7.5 Assessment of flood risk is ongoing with the LLFA.
- 7.6 The level of on-site parking proposed is appropriate in this area and would be mitigated by contributions towards the introduction of a CPZ in the vicinity of the site, a car club bay and Travel Plan.

8 SPECIFIC FEEDBACK REQUESTED

- 8.1 In view of the above, it is suggested that Members focus on the following issues:
 - The initial design approach of the scheme in particular height (but also siting, scale, mass, use of materials) and treatment of south west corner.
 - The affordable housing offer and split
 - Whether car parking provision indicated is appropriate.
 - Any other matter that Members see as important to secure if this development was to come forward.