

**PART 5: Development Presentations**

**Item 5.1**

**1. DETAILS OF THE DEVELOPMENT**

Ref: 19/05882/PRE  
Location: 26-52 Whytecliffe Road South and Purley Station Car Park  
Purley, CR8 2AW  
Ward: Purley and Woodcote  
Description: Demolition of existing terrace properties, redevelopment of site with buildings ranging between six and ten storeys in height and with a rear five storey building, providing 262 residential homes and replacement station car park.  
Drawing Nos: Design and Access Statement dated August 2020.  
Applicant: RAA Ventures/Regent Land/V Fund Purley 3  
Agent: Kevin Goodwin, KG Creative Consultancy Limited  
Case Officer: Barry Valentine

**2. PROCEDURAL NOTE**

- 2.1 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.
- 2.2 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.
- 2.3 The report covers the following points:
- a. Executive summary of key issues with scheme
  - b. Site briefing
  - c. Place Review Panel feedback
  - d. Summary of matters for consideration
  - e. Officers' preliminary conclusions
  - f. Specific feedback requests

**3. EXECUTIVE SUMMARY OF KEY ISSUES WITH SCHEME**

- 3.1 The provision of 262 homes that exceeds the policy allocation requirements, within an area that is well placed for high density residential led development due to its high PTAL, good access to public transport, local shops and services, is actively welcomed. The affordable housing offer will need to be finalised, but would meet or exceed the 30% minimum policy requirement (dependent on

confirmation of tenure). The station car park is retained in line with allocation requirements.

- 3.2 The height of the development, whilst in excess of the Purley place-specific policy, is well considered and forms an appropriate site specific response to the site's potential. The eventual affordable housing offer, along with public realm improvements, will need to be balanced against the exceedance of the Purley place-specific policy. Whilst further design development and confirmation on quality of living accommodation and external spaces is still required, the development does appear to take a logical and well considered approach to massing, bulk and design. Further refinement and greater clarity of detailing and materiality is necessary.

#### 4. SITE BRIEFING

- 4.1 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 the station, and a series of residential terrace properties. The site has an area of 0.75 hectares.

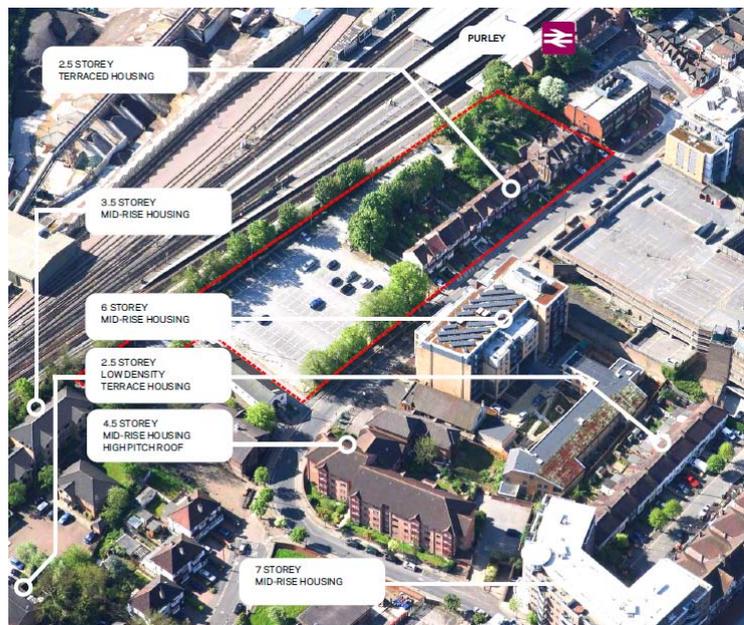


Fig 1 – Site Location Photo

- 4.2 The residential properties are located at the south western end of the site, and made 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 gabled distinctive red bricked dormer windows. Immediately adjoining to the north east are two sets of terraced 1930s 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. These properties have modest 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.



Fig 2 – Photo of terrace properties

- 4.3 At the north eastern end of the site is the Network Rail car park for Purley Train Station. This consists of a main central square car park, with two arms that extend along the south eastern boundary, with one of the arms extending behind the rear of nos. 26 to 52, with the other to the north east extending behind Purley Social Club. The car park has one entrance from Whytecliffe Road South, located at the northern western end. To the front of the car park are a series of fifteen mature Lime trees. There is a change of land level across the site sloping down to the north.
- 4.4 The site has a PTAL (Public Transport Accessibility Rating) rating of 5. The site is located within an area at risk of surface water and critical drainage flooding and is located within an area where there is potential for groundwater flooding to occur at surface.
- 4.5 The site lies within the Place Specific Policy Area: DM42, Purley. The car park part of the site is allocated (no.61) in the Croydon Local Plan 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

- 4.6 Directly opposite the site is a multi-storey car park, which is an allocated site (no.30) within the Croydon Local Plan (2018). The allocation is 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*

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

#### 26 to 52 Whytecliffe Road South

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.'



Fig 3 – CGIs and plan of current planning application at no.26 to 52 WRS

### 64 to 74 Whytecliffe Road North

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.'



Bird's eye view of 64-74 Whytecliffe Road (Planning Ref: 19/02678/FUL)



First Floor Plan of 64-74 Whytecliffe Road (Planning Ref: 19/02678/FUL)



CGI of 64-74 Whytecliffe Road (Planning Ref: 19/02678/FUL)

Fig 4 – CGIs and plan of approved planning application at no.26 to 52 WRS

### 53 to 61 Whytecliffe Road South

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'

### 58 Whytecliffe Road South

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.'

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. It is understood that this planning permission has been implemented.

### 63 Whytecliffe Road South

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.'

### 67 Whytecliffe Road South

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'.

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.'

### *Proposal*

- 4.8 The proposal is currently for demolition of the existing terrace properties and redevelopment with buildings ranging between six and ten storeys in height and with a separate rear five storey building, providing 262 residential homes and replacement station car park.



Fig 5 – 3D View of the Scheme

- 4.9 The development on its Whytecliffe Road South frontage adopts a mansion block typology, with a series of continuous buildings that run parallel to the street. The buildings are nine storeys in height at their northern and southern ends, stepping



Fig 7 – Lower ground and ground proposed floor plans.



Fig 8 – Massing Section of front elevation showing land level changes and relative floors.

4.11 To the front of the site the development would provide an enlarged pavement area, which would increase the pavement width from its current depth of 1.7m and 2m, to between 6.7m to 9.3m. The development would create a newly formed public space at its northern end that incorporates the large retained trees that currently front the car park.



Fig 9 – CGIs showing public realm landscape improvements.

4.12 The development would provide 126 one bedroom units, 113 two bedroom units and 23 three bedroom units.



4.13 It is worth noting that part of this site was previously presented to Planning Committee at pre application stage in April 2019. At this stage, the pre application was only for 26 to 52 Whytecliffe Road South (now granted under planning reference 19/03142/FUL) and 64-74 Whytecliffe Road North (subject to a current planning application 19/03142/FUL), with the car park area of the current site only shown indicatively. The applicant has subsequently secured an option to develop the car park, so can now provide a comprehensive redevelopment.



Fig 11 – Extracts from the scheme presented to committee in April 2019

4.14 It is understood that the applicant is intending to submit their planning application by the end of the year.

## 5. PLACE REVIEW PANEL FEEDBACK

5.1 An earlier iteration of the scheme was presented to the Council's Place Review Panel in 20<sup>th</sup> April 2020. The Panel's main comments were:

- The Panel were pleased to see a comprehensive development which includes the car park. However, they were concerned that this proposal represents overdevelopment of the site.
- Panellists felt that 10 storeys was very difficult to justify in townscape terms for a peripheral street such as this. They recommended to follow the massing guidance in the Place Specific Policy, and commented that 6-7 storeys would be more achievable and would mitigate some of the other issues raised. The Panel felt that the additional height would not necessarily improve viability due to the increased construction costs associated.
- It was felt the top floor elements did not work well in terms of their proportion and architecture. The relationship between top and bottom was felt to require more resolution.
- It was strongly suggested that any amendments to the massing are based on assessment of townscape views and the pedestrian experience at street level.
- Whilst it was felt that the "Mansion Block" typology could work well, they questioned 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. One way of overcoming this may be to redefine the uses at ground floor to deliver more activated frontage. The communal use was felt to appear as residual and leftover and there were concerns this space may be left empty if it cannot be let.

- Refuse and cycle stores should be less prominent on the main frontage. The Panel strongly recommend that the servicing strategy be interrogated further and taken off-street if possible.
- The Panel felt that the entrances were severely underplayed. The Panel stated that the lobbies should be far more generous and legible.



Fig 12 – Images of scheme presented to PRP

5.2 The scheme has progressed since Place Review Panel, with the key changes as follows:

- The ninth storey on the two end blocks has been recessed and stair core reduced to help address concerns over bulk and proportionality of upper floors.
- A viability study has been submitted.
- Communal use removed from the proposal.

## 6. SUMMARY OF MATTERS FOR CONSIDERATION

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

- Land Use
- Height, Bulk and Design
- Impact on Neighbouring Properties Living Conditions
- Highway and Parking
- Trees/Biodiversity

### Land Use

#### *Residential Use*

6.2 The London Plan sets a minimum ten year target for the borough of 14,348 new homes over the period of 2015-2025. The Croydon Local Plan (2018) sets a minimum twenty year target of 32,890 homes over the period of 2016 to 2036.

The proposed development would create additional residential units that would make a significant contribution to the borough achieving its housing targets as set out in the London Plan (2016) and Croydon Local Plan (2018).

- 6.3 The Draft London Plan is nearing adoption, the Mayor of London in his 'Intend to Publish London Plan 2019' sets a 10 year target for Croydon of 20,790 homes. The Draft London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on sites with high PTAL (3 to 6).
- 6.4 The site has a high PTAL, good access to public transport, local shops and services and is well placed for high density residential-led development. The density of the development would 350 units/hectare, with the current London Plan depending on number of habitable rooms per unit, recommending between 45 to 260 u/ha for a central location with PTAL of 4 to 6.

#### *Site Allocation*

- 6.5 Part of the site is allocated in the Croydon Local Plan (2018) and requires between 21 to 119 residential units to be delivered. The precise number of proposed units within the allocation area is not clear, but it appears to be in excess of 119 units required. There are no in principle concerns with going above the allocation as it would increase residential supply within the borough, subject to details later in this report.
- 6.6 The site allocation requires the retention of the public car parking spaces, with any reduction appropriately justified through a transport assessment. The merits of the proposal in regards to this are discussed within the transportation section.

#### *Affordable Housing*

- 6.7 Policies SP2.4 and 2.5 of the Croydon Local Plan (2018) set out that a minimum of 50% of units must be secured as affordable housing on sites of ten or more homes. Policy seeks a 60:40 tenure split between affordable rented homes and intermediate (including starter) homes, unless there is agreement between Croydon Council and Registered Provider that a different tenure split is justified. The split seeks to provide a range of housing types to help ensure the creation of mixed and balanced communities.
- 6.8 The applicant has submitted a viability statement that indicates that the scheme would be unviable at a 31% affordable housing offer, with a 60:40 split, producing a significant deficit. Despite this the applicant has indicated that they will take a business decision to offer 30% affordable housing, at 59% London Affordable Rent and 41 % shared ownership. The applicant viability review has been independently reviewed, and as it currently stands, the independent assessor considers that the development could provide up to 35% affordable housing at a 60:40 split. Further discussions, prior to submission will be needed between the viability consultants to establish what the maximum reasonable affordable housing offer is, and in turn, along with any other benefits, this will then need to be balanced against any exceedance of the Purley place-specific policy.

#### *Unit Mix*

6.9 Policy SP2.7 sets a strategic target of 30% of all new homes up to 2036 to have three beds or more. SP2.5 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. Policy DM1 of the Croydon Local Plan (2018) requires developments located within an Urban Area with PTAL 5 to provide 40% of the units as three bedroom or larger. Policy DM1 does outline some exceptions where this quantum of larger units would not be sought. These exceptions are as follows:

- a) Where there is agreement with the associated affordable housing provider that three or more bedroomed dwellings are neither viable nor needed as part of the affordable housing element or any proposal, or
- b) Within three years of the adoption of the plan, where a viability assessment demonstrated that larger homes would not be viable, an element may be substituted by two bedroom, four person unit comply with the floor space specifications of national Technical Standards or the London Mayor's Housing SPG or equivalent.

6.10 At present 9% (23 homes) would be three beds, and 31% would be two bed four person (82 homes). The proposal would be policy compliant if the exceptions outlined in the policy above are met.

#### *Quality of Residential Units*

6.11 All of the proposed residential units meet minimum floorspace and private amenity spaces standards set out in the London Plan (2016). 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. North facing is defined as having an orientation less than 45 degrees either side of north (i.e. between north west and north east).

6.12 A large number of the units are dual aspect. There are some exceptions, most notably close to the access road on the north east elevation. Given that these units represent a low proportion and are in part driven by a logical response to the site constraints, then on balance the quality of these units may be considered acceptable. The applicant should continue to look at ways to improve the standard of these units especially given their main view is over car park entry point. To date, no sunlight and daylight data has been provided for the residential units. Officers consider that the massing of the development cannot be fully agreed until this has been provided.

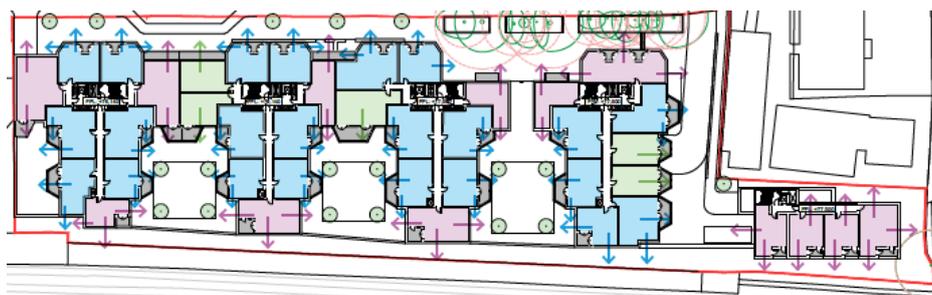


Fig 13 – Plan showing aspect/outlook of each unit.

- 6.13 Further details and reassurances will also need to be provided as to the quality of remaining residential units located at lower ground floor level facing onto Whytecliffe Road South within the centre of the site.
- 6.14 In terms of privacy between the units, the courtyards are approximately 17m wide, ensuring good window to window relationships. The design of the terraces will need to be carefully considered due to the closer proximity of terrace areas to other flats windows within the development.
- 6.15 In terms of noise, it is likely that the station car park would be 24 hours a day, so further details will be required on how the car park could be operated in a way that would not cause noise disturbance to those units that face over the access road, or which are close to pedestrian access points. The development will also need to adopt the 'Agent of Change' philosophy given its close proximity to the road, busy railway line and aggregates, placing the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new development.
- 6.16 Further details on the quality of communal amenity space provision will be required to ensure that it is adequately lit, well designed, accessible and contains high quality child playspace in line with policy.
- 6.17 Further details are required on the pedestrian route to the rear building, to ensure this is an attractive, welcoming and safe environment, given its close proximity to the car park access road and the tall wall of the adjoining no.58 Whytecliffe Road South.
- 6.18 In regards to accessibility, London Plan Policy 3.8 'Housing Choice' requires 90% of dwellings to meet M4(2) 'accessible and adaptable dwellings' Building Regulations requirement, with the remaining 10% required to meet M4(3) 'wheelchair user dwellings'. It is understood that the development would comply with these policy requirements, but it is unclear at what mix in terms of bedroom types and tenure.

### Height, Bulk and Design

#### *Policy Principle of Height*

- 6.19 Croydon Local Plan (2018) Policies SP4, DM15 and Place Policy DM42: Purley are the most relevant policies for considering the principle of a tall building within Purley. These policies will be analysed in turn below:

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.”*

- 6.20 The site is not within the Croydon Opportunity Area, and lies (just) outside the Purley District Centre. However it is well connected to public transport interchanges with Purley Train Station 30m to the south east, which provides quick convenient connections into the Croydon Opportunity Area, Croydon Metropolitan Centre and other district Centres. The proposal as such does not conflict with the requirements of SP 4.5.

SP 4.6 states:

*“Some locations within the areas listed in SP4.5 will be sensitive to, or inappropriate for tall buildings and applications for tall buildings will be required to:*

- a. Respect and enhance local character and heritage assets;*
- b. Minimise the environmental impacts and respond sensitively to topography;*
- c. Make a positive contribution to the skyline and image of Croydon; and*
- d. Include high quality public realm in their proposals to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area”*

- 6.21 The above criteria will be considered in further depth within the rest of this report. In conclusion, it is considered that there is a reasonable prospect that a tall building in this location could meet the requirements of the policy.

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.*

The relevant part of Policy DM42: Purley states:

*DM42.1 Within Purley District Centre and its environs, to ensure that proposal enhance and strengthen the character and facilitate growth, developments should:*

*a. Reinforce the continuous building line which responds to the street layout and include ground floor active frontages;*

*b. Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys; and*

*c. Demonstrate innovative and sustainable design, with special attention given to the detailing of frontages.*

6.22 The approved Purley Baptist Mosaic Development (Planning reference 16/02994/P), which includes a 17 storey building, is considered to have taken the policy allocation for a landmark tall building.

6.23 Given that the proposed buildings are over 8 stories, the development is likely to be considered a departure from Croydon Local Plan (2018). A Local Planning Authority may depart from development plan policy where material considerations indicate that the plan should not be followed, subject to any conditions prescribed by direction by the Secretary of State. The power to depart is set out in Article 32 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

6.24 It is important that the Croydon Local Plan is read as a whole, and that failure to comply with a single policy within the plan would not necessary lead to a sustainable reason for refusal. In order to justify the departure the council will need to be satisfied that the development is able to demonstrate clear benefits that actively and incomprehensively outweigh the areas of non-compliance.

6.25 It should be noted that the policy requires development to complement the existing building heights, rather than it must be 3 to 8 storey height. It could be argued that whilst the development is taller than the 8 storey height, it is still complementary, and therefore within the spirit of the policy parameters.

#### *Townscape Impact of Height*

6.26 The two ends of the development read as eight storeys, with a six storey frontage, two storey upper level, containing a less visible ninth storey that is set back over the wings of the development. This approach to height ensures that the building reads predominantly as eight storeys from key street views, and seen as complimentary to the existing heights found in Purley. The building then steps up to ten storeys in the centre, with the most visually prominent frontage building being maintained at six storeys, with a three storey upper level and a further recessed level over the perpendicular wings. The full ten storeys would be rarely read and would generally only be seen in glimpse views over the Purley roofscape or in long distance views, or in certain periphery views, where the development would read as a gentle transition from the eight plus one storey height of the adjacent block. The height of the development is, in officer's view, an appropriate response.



Fig 14 – CGI view from junction of Whytecliffe Road North and Whytecliffe Road South.

6.27 The six storey frontage block has a linear form, which helps create a defined street edge that corresponds directly with heights of buildings already found along Whytecliffe Road South. The six storey height of this frontage block is the maximum that can be achieved, and any additional increase in height to the frontage block would begin to have unacceptable impacts on neighbouring properties' sunlight and daylight.



Fig 15 – CGI view looking north along Whytecliffe Road South

6.28 Compositionally the six storey, two storey top and one storey recessed form at each end achieves a successful balance. However, there still remain some concerns on the central two blocks upper levels in proportion to the lower levels and their impact on Whytecliffe Road South and the wider townscape. These are of most concern when viewed from the northern approach and are not helped by the amount of blank elevation. If this is addressed and additional views provided then these concerns may be able to be resolved.



Fig 16 – CGI showing elevation proportionality

### *Heritage*

- 6.29 There are several notable heritage assets within proximity of the development, setting of several heritage assets including Grade II listed Purley United Reformed Church, Grade II listed Purley Library, Grade II Listed Russell Hill Schools Main Building, Webb Estate Conservation Area, Purley Local Heritage Area, Royal Russell School Locally Listed Park and Garden.
- 6.30 The proposed massing has been tested from agreed points to establish the visual impact in views of/from these assets, and has been refined accordingly. The new building would be minimally visible or not visible in most of the tested views and officers do not think there would be any adverse impact on views.
- 6.31 The most impacted would be the setting of Purley Station, which is locally listed. The proposed development has the potential to enhance the existing street character and pedestrian journey to the station, and help provide legibility, but only if the design and landscaping, especially at human level achieves a sensitive contextual response.

### *Massing Approach/Layout/Form*

- 6.32 On the Whytecliffe Road South frontage, the massing steps in and out helping to emphasise the bay form, whilst also breaking up the massing to prevent it feeling overbearing. The bay form is also a feature of properties in Purley. At the northern end the building line steps back significantly to retain the trees and provide a new public space. The creation of public spaces in other locations was explored, namely to the rear and closer to the station, but it was felt to be of most benefit to the front of the site and to ensure the retention of key trees. A generous pavement width was also considered important given the existing shortcoming and poor pedestrian environment of this part of Purley.
- 6.33 The perpendicular wings extend to the rear of the site and stop short of the railway line to provide a building free buffer as required by Network Rail. The end of the perpendicular blocks taper in to give greater sense of space, and also to allow greater levels of light in. The orientation of the site is favourable with the rear elevation facing south east, ensuring that light will be able to penetrate into

courtyard spaces and hopefully providing good daylight and sunlight conditions to the homes. Although the latter needs to be confirmed through an appropriate sunlight/daylight study before the massing and approach can be agreed. There is sufficient spacing of circa 17m between the blocks to be able to provide good living conditions in terms of outlook and privacy.

*Elevational Treatments*

6.34 The applicant has chosen to use the mansion block typology as a means of expressing the massing of the development. Whilst the mansion block typology is acknowledged as not being prevalent within Purley at present, it is a well-established and successful way of achieving good density which has character and adds visual interest. The applicant has studied the existing character of Purley and has made a case for the appropriateness of the typology within its context. This has been aided by a study of the existing architectural features of Purley in terms of architectural proportions, materials and detailing. These features have been translated into the design relatively successfully, although some refinement is still required.



Fig 17 – showing the detailed design and materials of elevations

6.35 Officers consider that the mansion block typology adopted by the applicant is an appropriate way of sensitively intensifying and evolving Purley, and is a significant improvement on other earlier attempts to intensify on Whytecliffe Road South, which the officers would not want to see replicated.

6.36 The main frontage building would be a brown brick, with a red colour brick on upper floors. Stone would form the base storey of the building. The lower six floors would have a stone sill, with the upper floors and rear would have with a concrete sill. In general the palette of materials is supported and appears well rooted in the character of Purley town centre. Further refinement of the expression of the materials are needed as part of design development, in particular the upper levels of blank façade (core location), the entrances and the bike stores. Similarly more detail and understanding of how the development would be perceived at human scale, including key lobby areas is required, as highlighted by the Place Review Panel.

6.37 There is a variety of fenestration types between the base, top and recess level which is supported, however further clarity is still required on reveal depths, which should be generous. Officers have concerns over the extent of the blank façade in the centre of each section, which is making the top storey appear excessively heavy.

6.38 Given that the car park would be publically accessible, it is considered important that the development incorporates the principles of secure by design.

#### *Ground Floor Activation and Legibility*

6.39 The ground floor of the development is required to host a number of functionary uses, such as bin stores and cycle stores. Similarly residential uses in close proximity to the street is also problematic. This does provide a challenge in terms of activation. Earlier proposals did include a community use, but this was discounted following concerns raised by PRP and the regeneration team, as well as the fact that it was not policy compliant, with community uses preferred within the district centre. The applicant is exploring methods for improving activation, including looking at providing some views or illuminance into/from the bicycle store, increasing entrance lobby sizes, looking at landscaping solutions and public art.

6.40 The car park main entrance will be from the enlarged public space area. Legibility has been provided from its location and by creating a gap, archways above and generous lobby areas. It will be expected that this is developed further and the scheme design progresses post committee.

#### *Landscaping, Public Realm & Outdoor Amenity Space*

6.41 The applicant has identified that Purley sits within the Downlands, specifically Chalk Downlands of the Green Grid, whilst also comprising additional landscape typologies such as the Great Northwood and Heathland. They have also drawn on local landscape context that is most significantly identified within The Webb Estate and Upper Woodcote Village Conservation Area. Reference has also been made to Croydon Public Realm Design Guide, and associated material palette. The frontage would have a 'nature in the city' theme, whilst each of the courtyards would have a separate theme; consisting of Great Northwood, Heathland and Downland.

6.42 Initial thematic ideas for the landscaping have been developed, which appear to be strong and relevant to the local landscape characters. However, these do not appear to have been translated into the design of the landscaping in a clear and obvious way. SUDS appear to have been well integrated into the design. The interconnectedness of the three courtyard spaces and biodiversity buffer to the rear are both welcomed. Officers have raised concern over the large area of hardstanding/decking within the shared courtyards, and have asked for this to be greened further.

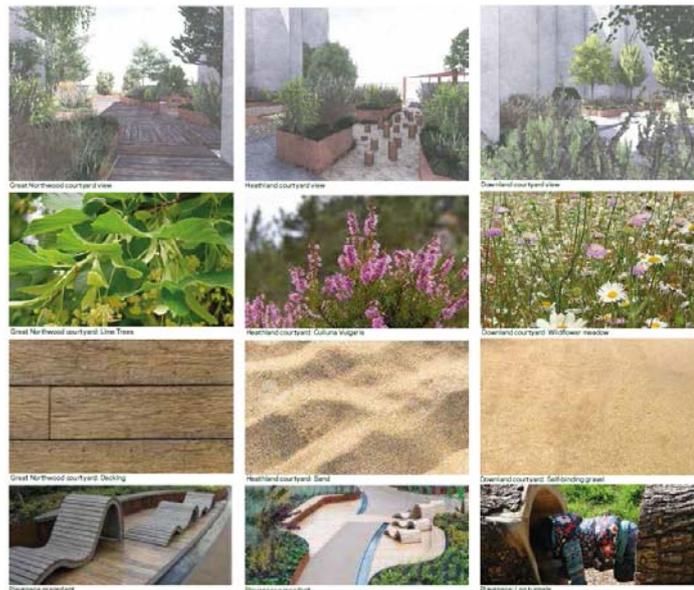


Fig 18 – Courtyard Landscape Design Images

6.43 A public art strategy will also need to be outlined and developed, and this could help improve the schemes contextuality.

Impact on Neighbouring Properties Living Conditions

6.44 One of the critical considerations for this site is the potential impact of the development on living conditions of existing and potential neighbouring properties. In terms of existing residential properties, the most sensitive are flats located within nos.51 to 53 Whytecliffe Road South, that sit opposite the site (see photo below). 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. Any meaningful redevelopment of this site would have a noticeable detrimental impact on these properties’ light and outlook, and likely to result in failure of BRE daylight and sunlight guidelines.



Fig 19 – Birds eye view showing location of nos. 51 to 53 WRS

6.45 The site, with its highly sustainable location, excellent public transport links, brownfield characteristics and close proximity to town centre, is one where policy directs high density residential development. In addition the car park is an allocated site which adds to the intrinsic development policy expectation. In light of this it is a site where there is sufficient justification to accept lower alternative BRE target values.

6.46 The applicant has undertaken some initial testing of the proposed development. The vast majority of windows when measured on an unfettered façade (a façade where balconies/projections are removed), would receive a vertical sky component (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.

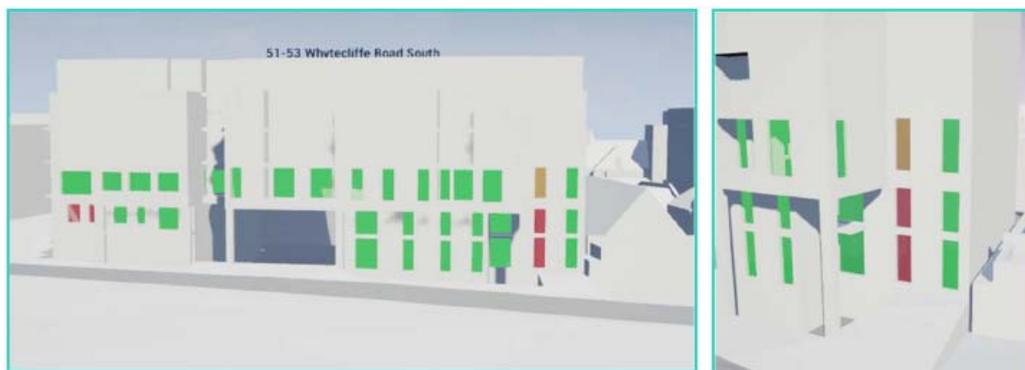


Fig 20 – Model shot showing locations of windows that receive less than 18% VSC.

6.47 To establish an acceptable benchmark/alternative value, the applicant has tested the impact of a six storey 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 would be comparable to other surrounding building and given the wider policy context. The six storey model is shown below.

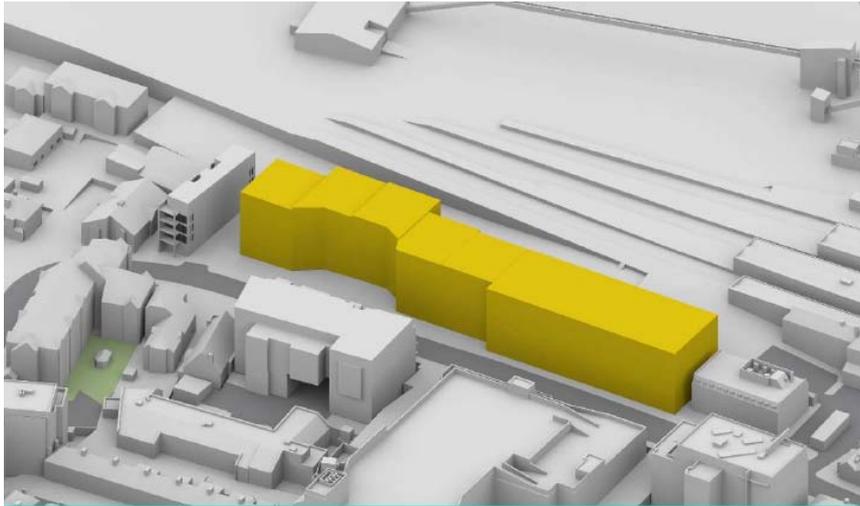


Fig 21- Showing the baseline model used to inform benchmark/alternative values.

- 6.48 The applicant states that when the development is compared to six storey massing, the variations in the retained VSC values are less than 1% to most windows, with many windows in nos. 51-53 Whytecliffe possibly retaining higher VSC values.
- 6.49 In term of sunlight, the applicant has indicated that the impact of the development will be minimal and fully compliant with BRE Guidelines, with the retained annual sunlight hours to the living room windows remaining good for an urban location.
- 6.50 The rear block would not cause significant harm to the amenity in terms of light and outlook of the adjacent Redburn Close property due to the appropriate front and rear building lines of this block, the spacing to the side boundary and absence of habitable windows on the flank elevation of this property. Care will also be needed on design of the terrace areas adjacent to this property to prevent loss of privacy to the neighbouring garden.
- 6.51 In regards to the impact of the development on the under construction no.58 Whytecliffe Road South; the west facing windows are non-habitable or are secondary windows serving dual aspect living rooms or bedrooms, and the impact of the development on these windows would be acceptable. Whilst there would be windows within the development that would breach BRE guidelines in terms of VSC and no-skyline (NSL), they would still provide high quality accommodation as they would achieve high average daylight factor (ADF) values.

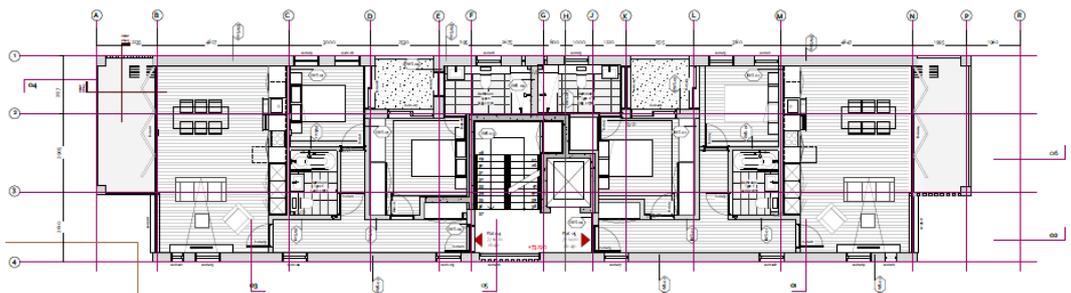


Fig 22 – Showing floorplan approved under NMA for 58 WRS.

6.52 Whilst further information and work needs to be undertaken by the applicant, officers consider that there is a reasonable prospect that the impact of the proposed development on neighbouring light could be justified. Similarly officers are likely to be satisfied that the development would not compromise the delivery of the multi storey car park allocation. It is also likely that the current proposal, especially in regard to height of the street facing front building, represents the maximum permissible envelope. It is within this restraint that has led to many of the massing and design choices presented by the applicant in this scheme.

*Privacy, Outlook and Sense of Enclosure*

6.53 The separation distance between the front elevation of the proposed development and properties opposite is a minimum of 17m, ensuring good window to window privacy relationships.

6.54 In regards to under construction no.58 Whytecliffe Road South, the south eastern flank elevation of this development largely features openings which serve non habitable rooms (corridors) or secondary windows, as such the development's impact on outlook of these windows is acceptable.

6.55 The five storey block would be to the rear of the 58 Whytecliffe Road South. The western wall of this new block does not extend directly in front of the rear wall of no.58. Whilst this would limit the eastern aspect and outlook of the units within no.58 given that no.58 features a balcony which limits its aspect to some extent, and given the close proximity of no.58 itself to its rear boundary, which is somewhat unneighbourly, the relationship is considered acceptable. No.58 will still experience good level of outlook commensurate with its location in an urban environment.



Fig 23 – Showing relationship between rear block and rear of 58WRS

Highways and Parking

6.56 The proposed development significantly improves the pedestrian environment on a key pedestrian route to the train station. This is a significant public benefit, which will help to promote sustainable modes of transport both within the development and Purley generally, whilst also helping facilitate future development.

- 6.57 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 by reference to occupancy rates at peak times. The site allocation requires the retention of public car parking spaces. It is understood that the proposed parking area is the same size, but the number of car parking spaces will be reduced from 195 to 175 spaces, in order to ensure that modern parking standards are met. Given that planning policy generally seeks to reduce reliance on car use, and the deficiencies of the current car park, the modest reduction in number of car parking spaces is likely to be acceptable.
- 6.58 All the car parking spaces, apart from some of the disabled car parking spaces, are for the general public. Given the high PTAL rating, the provision of a car free development is deemed acceptable. Residents will not be entitled to parking permits and the applicant will also need to agree to fund the extension of CPZ area to the north of the site.
- 6.59 The car park area has two entrances. The entrance to the south which is closer to the rail station is understood only to access the disabled residential car parking spaces, with the main car park entrance accessed from the north. The access strategy to the car park is considered appropriate, ensuring limited car movements close to the station where there is increased activity, including pedestrian movement.
- 6.60 Given the characteristics of Whytecliffe Road South, and also to ensure that healthy streets and public benefits of the scheme are delivered, ensuring a well thought through and practical servicing strategy will be essential. Blocks C to E (those at the northern end) would be serviced internally from within the site. Blocks A and B, would be serviced from the street from a newly created servicing inlet. The development would require a Construction Logistic Plan, which would be expected to be submitted at draft stage upon application. Key consideration as part of this would be how the development would be phased and potentially allow for the retention of some station car parking during construction.

#### Trees/Biodiversity

- 6.59 None of the trees within the site are subject to a tree preservation order, and as such could be felled without further consent. The applicant has not confirmed yet formally which of the trees would be retained, removed and what tree planting will be proposed to mitigate the loss. However, the development has been designed to respond and retain the majority of the prominent good quality trees located to the front of the existing car park. At the north eastern end, some tree removal is likely to be required due to the new car park access point. Whilst regrettable, given that the access to the car park is in a logical place, and the massing proposed is a logical response to the site, this loss is justifiable. The biggest potential loss of trees would be in the centre of the site to the rear of the existing terrace properties. However these trees are poor quality and their loss is necessary to achieve a comprehensive and meaningful redevelopment and the benefits associated with that. New trees will be planted to the front, which would contribute to visual amenity of the public realm. Similarly there is scope for

tree planting within the courtyards, although this will need to be balanced with providing good sunlight to the spaces/units and practical provision of playspace.

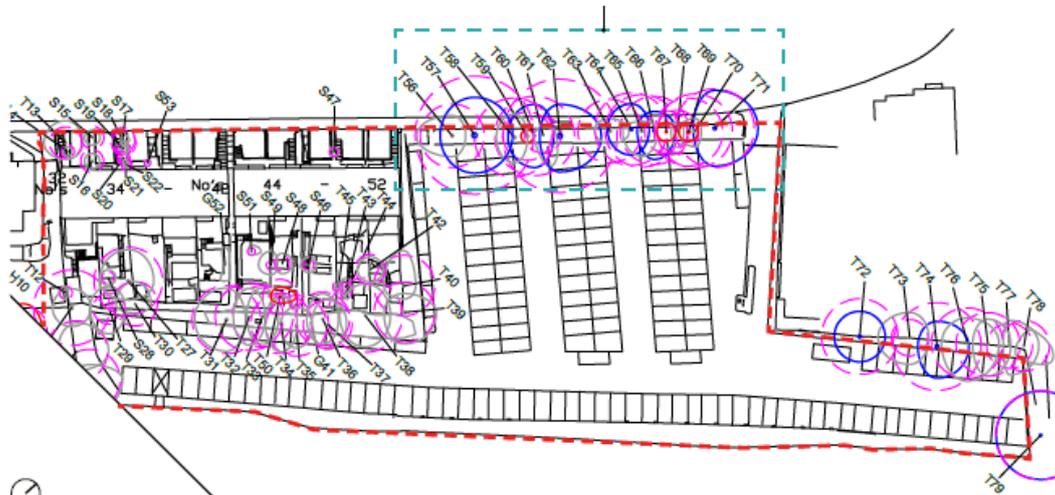


Fig 24 – Extract from tree survey with category B trees shown with blue circle

6.60 In terms of biodiversity measures, a wildlife buffer strip will be provided along the rear of the development, along with green roofs, which will have their species chosen to reflect the downland which Purley is located within.

#### Other Considerations

6.61 A wind study has been provided, which shows that wind microclimate at ground level is expected to be acceptable for sitting and standing use during the windiest season, and there are no instances of strong winds. All the internal communal garden courtyards provided within the development would be suitable for sitting during the summer season. The report identifies a few instances within the site where windier conditions than ideal would be experienced, which are as follows:

- a. Entrances to the proposed development on the north-western façade;
- b. Balconies with strolling conditions during winter at seventh to ninth floor levels; and
- c. Roof terrace amenity spaces with standing and strolling conditions during summer at fifth to ninth floor levels.



**Table 1: Lawson Comfort Criteria**

Key	Comfort Category	Threshold	Description
●	Sitting	0-4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods
●	Standing	4-6 m/s	Gentle breezes acceptable for main building entrances, pick-up/drop-off points and bus stops

Fig 25 – Proposed Summer Wind Conditions Ground Floor

6.62 Further discussion with the applicant will be required to see if the conditions in these locations can be improved, as well as to explore whether the wind conditions within the newly created public space could be improved further.

6.63 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.

6.64 All major developments are required to provide a Flood Risk Assessment (FRA). This will need to consider all sources of flooding and suggest appropriate mitigation measures. A Sustainable Urban Drainage System (SUDS) strategy will also be required so that the development achieve greenfield runoff rates.

6.65 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions are forthcoming in relation to the heads of terms, but it is anticipated that these would include the following:

- Affordable housing (on site)

- Affordable housing review mechanisms (early and late stage)
- Employment and Training strategy and contribution (construction)
- Air Quality
- Zero carbon off-set
- Securing potential links to district heating
- Car club (provision and membership)
- Travel Plan
- Car permit restrictions
- Public Realm improvements and maintenance
- Highway works

## **7 SPECIFIC FEEDBACK REQUES**

7.1 In view of the above, it is suggested Members focus on the following issues:

- i. The principle of a high density residential development in a PTAL5 location.
- ii. The height and bulk of the development, especially in the context of the Purley place-specific policy, and whether the development can deliver sufficient benefits to justify a departure from policy.
- iii. Whether the proposed design direction and elevational treatment is an appropriate response to its context.
- iv. The emerging landscape design and the increased public realm to Whytecliffe Road South.
- v. The level of affordable housing and whether an alternative mix to deliver 30% is acceptable.
- vi. The likely impact on neighbouring living conditions and whether alternative BRE daylight/sunlight targets are appropriate.
- vii. Whether a car free development, with disabled parking provision only for the residential component, is acceptable given the PTAL 5 location.

## Appendix 1: BRE Guidance Terms

### Daylight to existing buildings

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

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

### Sunlight to existing buildings

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

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

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