PART 5: Development Presentations

Item 5.1

1. DETAILS OF THE DEVELOPMENT

Ref: 20/00549/PRE

Location: 922-930 Purley Way, Purley, CR8 2JL

Ward: Purley and Woodcote

Description: Erection of three apartments blocks to provide 149 homes with a

maximum height of 14 storeys with alterations to the land levels associated landscaping, continued use of the existing highway

accesses and car/cycle parking as well as bin storage.

Applicant: Justin Homes Agent: Iceni Projects Case Officer: Tim Edwards

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 A planning application for the proposed development would be referable to the Mayor of London under the Mayor of London Order 2008.
- 2.4 The applicant has submitted a pre-application enquiry to the Greater London Authority (including consideration by Transport for London) for an opinion. A meeting is due to take place on 6th October. If required a planning addendum shall provide an update accordingly on the GLA verbal feedback from this meeting.
- 2.5 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) Specific feedback requests

3. EXECUTIVE SUMMARY

- 3.1 The proposed scheme is for the erection of three blocks ranging from six to fourteen storeys in height. This would comprise 149 units across the site with associated communal areas and amenity space alongside wheelchair accessibility parking spaces and an access from Purley Way.
- 3.2 The scheme has developed through a series of pre-application meetings with officers and consideration by the Place Review Panel (PRP) on two occasions (with the second PRP discussion also taking place on 15th October 2020). A summary of the Panel's first feedback is included within this report and a verbal overview of the feedback provided following the second review shall be provided to Planning Committee.
- The site is well located within a high PTAL, closely located to public transport, local shops and services and is adjacent to a prominent intersection. It is just beyond the District Centre boundary and falls within the environs of the Purley place specific policy. Due to its location it is considered to be a suitable site for an intensive development to make best use of sustainable transport and services but an appropriate development also needs to respond to the suburban context (detached two storey houses) adjacent. The scheme forms a series of three buildings increasing in height from the north (6 storeys, adjacent to a detached house) a middle block of 9 storeys and a corner block of 14 storeys. The increasing heights is felt to be a good mechanism for responding to the change in character and site geometry to the south. This element of the proposal would exceed place specific policies but this is considered to potentially be appropriate if a scheme of very high quality can be secured (subject to townscape views), owing to the sites shape and location within Purley. 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 the site layout, massing, bulk and design, although further refinement is required in regards to detailing and materiality is necessary, as well as some additional testing.
- 3.4 As currently set out the proposed affordable housing offer would exceed the minimum 30% policy requirement, with this currently proposed at 35%.

4. SITE BRIEFING

4.1 The site lies on the western side of Purley Way, within 400 metres of the District Centre and approximately 600 metres walk from Purley Railway Station, as well as being within close proximity to numerous bus routes at its furthest point.

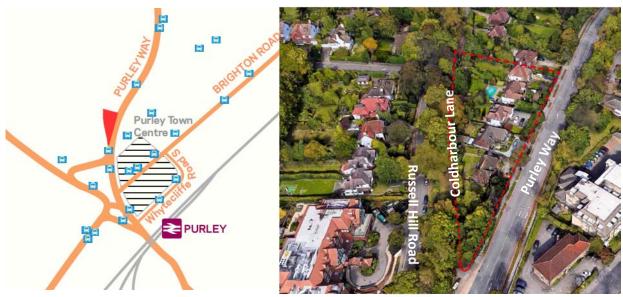


Figure 1: Site Location (shown in red triangle) left and Google Map (right)

- 4.2 The site currently includes 5 detached dwellings which front onto Purley Way where their vehicular and pedestrian accesses are located. The houses also back onto Coldharbour Lane, which is a former bridle way now used as a pedestrian and dedicated cycle way. The overall site has an area of 0.45 hectares.
- 4.3 The existing properties are a mixture of styles and forms, with land levels stepping up from the southern tip of the site, where part of 930 Purley Way's garden is currently situated to the northern boundary of 922 Purley Way, by approximately 5 metres. The site also steps by approximately by 3 metres from front (east) to the rear (west).



Figure 2: From Left to Right – 930, 928, 926, 924 and 922 Purley Way

4.4 All five homes have existing vehicular access from Purley Way and varying forms of trees located across the sites. None of the trees are protected formally through

Tree Preservations Orders (TPO's). There are also street trees located along the grass verges at the front of the site.

4.5 The site PTAL (Public Transport Accessibility Rating) ranging from 5 at the southern end of the site to 4 at the northern end. The site is located within an area at risk of surface water and is located within an area where there is potential for groundwater flooding to occur at surface.

Relevant Planning History

4.6 There is no relevant planning history for this site but there a relevant history from the adjoining sites which are:

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

This site, is directly west of the proposed scheme. It was granted planning permission in February 2020 and proposed the demolition of four existing houses and the development of a scheme of 106 flats which reaches up to 8-storeys in height.

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

This site is also directly west of the proposed scheme. It was granted permission in December 2019 and proposes the demolition of 1 existing house and the development of a scheme of 47 flats, up to 8-storeys in height.



Figure 3: CGI image detailing the developments at 29 - 35 and 37 Russell Hill Road

Purley Baptist Church - Ref: 16/02994/P

This scheme was recently granted permission by the Secretary of State in July 2020 after having been called in by the Secretary of State initially in 2017. The scheme proposes a residential development with community floorspace, 200 homes and up to 17-storeys in height.



Figure 4: CGI image of Purley Baptist Church Scheme.

Proposal

- 4.7 The proposal currently includes the demolition of the five homes and redevelopment with buildings ranging between six and fourteen storeys in height to provide 149 residential homes.
- 4.8 The development fronts both onto Purley Way to the east, Coldharbour Lane/Russell Hill Road to the west and being located within a prominent position within the wider district centre owing due to the land levels prevalent within and surrounding the District Centre.
- 4.9 The proposal would include three distinct flatted blocks with chamfered elevations to create views through and beyond the development from both directions. Block A would be split height a maximum of 14 storeys, then stepping down to 10 storeys at the rear.



Figure 5: Proposed Site Layout (left) and CGI Image of the proposed scheme (right).

4.10 Block B would be 9 storeys in height with Block C being 6 storeys. Owing to the land levels on site Block A would be set below that of the other two blocks as the land rises to the north of the site. The lower ground floor of Block A and ground floor of Blocks B and C would utilise the land levels to position plant, cycle and refuse stores within the buildings.



Figure 6: Proposed Eastern Elevation fronting onto Purley Way

4.11 At the southern tip of the site would be an enlarged pavement area/public space which is currently proposed to external seating and planters. This is close to the bus stops which sits just outside the site and adjacent to Coldharbour Lane.



Figure 7: Proposed site layout and landscaping around Block A

4.12 In-between Block A and B, would be a dedicated child playspace with level access provided to this space from the front (east of the site). Stepped access then allows movement around Block B and towards a rear communal space, with hard landscaped and soft landscaped areas provided primarily between Block B and C as well as to the rear of Block C. One other area is located between Block B and C and would primarily be accessible from the front of the site due to the 3 metre change in the land levels from east to west. Indicatively the landscaping scheme aims to utilise this land level and include a climbing wall. Another soft landscaped area is proposed with additional tree planting between Block C and 920 Purley Way.

4.13 Each block proposed would include two entrances, Block A, having a primary entrance facing towards the District Centre and then a rear entrance which allow access to the communal areas. Blocks B and C have entrances both to the front and rear of the site from Colharbour Lane.



Figure 8: Proposed land levels at the rear of Block C and adjacent to 920 Purley Way

- 4.14 The development would provide 49 one bedroom units, 94 two bedroom units and 6 three bedroom units.
- 4.15 The proposal would include on-site servicing with an ingress and egress provided from Purley Way. The development would retain two of the existing crossovers for this.
- 4.16 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 on 18th June 2020, in which the tallest part of the proposal was 9 storeys.



Figure 9: Proposed Eastern Elevation (top), Proposed site layout (bottom left) and Sketch image (bottom right).

5.2 The Panel's main comments were:

There is generally some support for the scheme. However there are many other items still to be resolved:

- 9 storeys constitutes a tall building and therefore requires clear justification in townscape terms. The Panel commented that just because this is a corner plot, it doesn't necessarily mean there is a need for a tall building. There is no justification of why this particular corner needs any kind of landmark.
- As well as no convincing arguments for the tall building there is also no evidence of exceptional architecture at present. The recommendation is to rethink the appropriateness of the tall building on this site.
- With regards the height transition between blocks, the 8 storey block is almost
 as tall as the 9 storey due to the sites topography. Therefore, it is suggested
 that the 8 storey building height is lowered to 7 or 6. It would appear much better
 as a pair of the 6 storey buildings which relate to each other, and one prominent
 (taller) building to the corner. These could have a different materiality.
- The applicant is advised to reconsider how the buildings are approached in terms of access, front doors and the relationship with landscape.

- The design should be amended to improve the legibility of entrances from the street, considering whether entrances should be grouped in a common lobby. Further investigation is needed regarding the "front" and "back" relationships.
- Regarding the lack of play space, the Panel noted that there is a potential for a large number of children in the scheme. It is currently difficult to identify where play might occur.
- The landscape looks somewhat leftover, leaving amenity spaces compressed between Block A and B and Russel Hill Road. All outdoor amenity spaces should be carefully designed and not be negatively affected by overshadowing of blocks.
- The front towards Purley Way is predominantly hard landscaped. Generally, there is a lack of well-designed open space, with lots of paths and retaining walls.
- Currently there is ambiguity and lack of definition on which spaces are publicly accessible and which are private for residents.
- There is very little information relating to the homes themselves, although the 70% dual aspect is promising. The applicant should consider the quantity and quality of facilities are proposed. It may be that in order to deliver successful amenity spaces, the quantum of accommodation on site should reduce. 133 homes on a site of 5 houses would appear over-development and a reduced scheme would more easily deal with the numerous design challenges.
- It was suggested that many of the above issues could be resolved if the scheme shifted into a two buildings rather than 3 blocks.
- The proposed architectural treatment at the corners appears to undermine the geometry of the plan form. Solid corners should be employed so as the blocks read as volumes rather than planes.
- The Applicant should undertake further contextual analysis to inform the architectural expression, fenestration, detailing and materiality. At present this looks generic and should be more place-specific. The recommendation is to review and revise the architecture approach and see how the contextual characteristics and local heritage can help to inform the proposal.
- 5.3 The scheme has progressed since Place Review Panel, with the key changes as follows:
 - A contextual analysis has begun to influence the architectural expression of the scheme.
 - Block A, has now increased in height from 9 to 14 storeys, with alterations to the massing. Justification for this height has started to take place and has been led by a number of Registered Provider interest in the scheme.
 - Blocks B and C have been simplified.

 A 35% affordable homes offer is now proposed (the tenure mix is yet to be confirmed).

6. SUMMARY OF MATTERS FOR CONSIDERATION

Land 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 331 units/hectare, with the current London Plan depending on number of habitable rooms per unit, recommending between 45 to 260 u/ha for a urban location with PTAL of 4 to 6

Affordable Housing

- 6.5 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.
- 6.6 To date no viability information has been provided however the applicant has stated that the proposal will meet the minimum 35% affordable housing level set by the GLA and the draft London Plan. As such, under the London Plan, this would take a fast-track route and not require viability testing for the GLA, subject to affordable tenure discussions. The applicant has stated that the tenure split will be agreed with the planning department with officers expecting further details on this point accordingly.

Unit Mix

6.7 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 4/5 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.
- 6.8 At present 4% (6 homes) would be three beds, and 63% would be two bed four person (94 homes). The proposal would be policy compliant if the exceptions outlined in the policy above are met which if relying on point b) above includes determination within three years of the adoption of the plan by February 2021.

Quality of Residential Units

- 6.9 All of the proposed residential units meet minimum floorspace and private amenity spaces standards set out by the National Housing Space Standards. The proposal provides a number of communal spaces/with child playspace opportunities. At this stage, although 35% of the units are stated to be provided as affordable housing tenures, no clarification has been provided in regards to which units are proposed to be which tenure and therefore the amount of child playspace cannot be confirmed to be compliant with Policy DM10.4d of CLP2018 until this has been undertaken.
- 6.10 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).
- 6.11 A large number of the units are dual aspect (stated to be 70% as currently designed). There are some exceptions, most notably the middle units of Blocks B and C, with one unit proposed at lower ground floor within Block C which is north facing. Overall, whilst the other single aspect units are understood as they are not north facing and make up a low proportion of the overall unit numbers, the one proposed ground floor within Block C which is north facing is a concern to officers. Whilst this unit's orientation is led by the proposed servicing needs for the site and with outlook onto a potential open communal green space at this time with the information presented to officers, this unit is a concern.
- 6.12 To date, only indicative sunlight and daylight data has been provided for the residential units with a brief statement detailing that with the appropriate scaled fenestration all units could meet the BRE standards. At this stage officers consider that the massing of the development cannot be fully agreed until this has been provided.

- 6.13 Further details and reassurances will also need to be provided as to the quality of remaining residential units located at lower ground/ground floor level facing both onto Purley Way and Coldharbour Lane owing to the land levels and proximity of the building (Block A and the rear of Block B) to the footpath. The applicant needs to demonstrate that these future occupiers' amenities will be protected whilst ensuring that they have good levels of outlook.
- 6.14 In terms of privacy between the units, the blocks are separated by approximately 12 metres in line with the guidance set out by the Suburban Design Guide for relationships between new to new buildings. Further details are required to fully demonstrate this relationship, in-line with the proposed massing and height for the scheme.
- 6.15 The site is notably in close proximity to a busy road junction and therefore officers have requested noise and air quality assessments are undertaken. Whilst to date these assessment have not been submitted for consideration the architects have begun to incorporate these points into their design, with winter gardens as opposed to open balconies facing onto Purley Way (apart from where open balconies are proven to be acceptable for future occupiers). The landscape proposal has also considered tree locations and pollution tolerant tree species.
- 6.16 Owing to the site location, the sense of arrival to each building will be important, notably for Blocks B and C. Front and rear entrances have therefore been included, with dedicated pedestrian routes within the site.
- 6.17 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

6.18 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 polices 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."

6.19 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 600m at its furthest point from the site, 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"
- 6.20 The above criteria will be considered in further depth within the rest of this report. It is considered that there is a reasonable prospect that a tall building (subject to detailed townscape analysis) 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.
- 6.21 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.
- 6.22 Given that two of the three blocks 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.
- 6.23 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.
- 6.24 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, especially noting the recently approved 8 storey schemes located within Russell Hill Road, west of the site and located at a high land level than the site, Block B being 9 storeys would therefore still be complementary to the site and surrounding, it would therefore be within the spirit of the policy parameters set out.
- 6.25 At this time whilst a taller element within Block A is considered appropriate, subject to detailed townscape views to ensure it is complimentary to the surrounding context, as well as noting the sites location at a higher level than that consented scheme at Purley Baptist. Officers are of the opinion that any height proposed within this corner will need to be carefully considered alongside the consented scheme at Purley Baptist.

Townscape Impact of Height and Massing

6.26 As highlighted above, there is a need to demonstrate within massing studies that any height within this corner must be of an exceptional quality which respects

- and enhances the local character of the area by successfully mediating between the Purley District Centre and the suburban character found north of the site.
- 6.27 Whilst height maybe considered acceptable within Block A (dependent on the points above), Officers have outstanding concerns regarding the proposed height and bulk of Block A combined regardless of the eventual height of the scheme. Officers are of the opinion that the tallest section of Block A should be revised to be a slimmer element at the corner of the site, with a more substantial step down that aligns with the current height of Block B (not as currently proposed being slightly unaligned).

Heritage

- 6.28 There are several notable heritage assets near to the development: the 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.
- 6.29 The proposed massing has yet to be tested from these points with the latest iteration of the scheme. Officers consider that the height, massing and bulk of the development cannot be fully agreed until this has been provided.

Layout/Form

- 6.30 The proposed layout and form of development has evolved through the preapplication process, providing breaks between the built form to allow views
 through the development to the trees to be retained within the site and those
 prominent street trees seen within Russell Hill Road directly west of the site as
 well as improving the quality of spaces around the building. Whilst the form of
 the buildings, being chamfered is not common within the surrounding context,
 officers are overall supportive of the approach subject to architectural detailing
 as it allows for improved connectivity through the site, outlook for future residents
 as well as sensitively intensifying a highly sustainable location.
- 6.31 Block A is noted to be located in close proximity to the public footpaths on both sides which will need to be carefully treated to ensure that it is of human scale so that it interacts within the adjoining public spaces, whilst protecting the amenities of any future occupiers located at lower levels within the building.

Elevational Treatments and Character

6.32 The applicant has begun to reference and consider the context immediately surrounding the site, most notably the parade located on Russell Hill Road. Whilst this may be appropriate for the 'urban' Block A, due to its location at the southern corner facing in part towards Russell Hill Road, Block B and C should seek to respond to the more relevant and immediate suburban context and character on Purley Way and Coldharbour Lane. Notably Block A, has been influenced by 960 Brighton Road (a locally listed building) which incorporates stone detailing, chamfered corners and deep reveals. Officers are strongly of the opinion that significant works are required, at a much finer detail to create a scheme which is truly of exceptional quality which responds to the local character to justify support for a taller element significantly beyond that identified within the

place specific policy already identified. Considering that some elements of the layout of the site and form of the buildings does not respond to the character of the area, it is necessary for the architectural appearance and detailing to show a clear response.



Figure 10: 960 Brighton Road (left), proposed materiality/details for Block A.

- 6.33 The proposed principle of one taller building seen within Block A and two well designed, but respectful blocks which are designed as a 'family of buildings' which allow the taller building prominence is considered appropriate. Officers however still consider that further differentiation between Blocks A and B/C is required as the design develops.
- 6.34 Whilst the red brick is seen within the wider area, officers are currently of the opinion that notably within Block A this overcomplicates the massing, form and shape. Alterations to the materiality should to be sought to create clear horizontal banding in the sites urban/suburban context having been further led by a detailed Character Appraisal.
- 6.35 Blocks B and C are currently articulated through two different forms of Brick. Officers again feel the approach undertaken here further accentuates the vertical impact of the scheme and requires revision and is replicated/ throughout all three blocks by the window treatment which also emphasises the building verticality. Officers believed that any proposed design should include stronger horizontal banding to reduce verticality whilst responding to suburban scale and proportions. Again, officers are of the opinion that more work is required in regards to how the proposal responds to the local character of Purley.



Figure 11: Foxley Hatch Public House (left), proposed materiality/elevational treatment for Block B/C.

- 6.36 Entrances should be clearly indicated as part of the façade approach. At current the proposed entrance treatment on Block B and C across two storeys are not supported. Officers are of the opinion that these should be revised to reflect pedestrian, suburban scale taking into account the existing character and material prompts found on the existing building within the site or immediate suburban context. These include but are not limited to curved entrance doorways, brick treatment, stepped rooflines and planting.
- 6.34 Given the sites location both fronting onto Purley Way and Russell Hill Road it is considered important that the development incorporates the principles of secure by design.
 - Ground Floor Activation and Legibility
- 6.35 The ground floor of the development is required to host a number of functional uses, such as bin stores and cycle stores. Similarly residential units in close proximity to the street are also problematic. This does provide a challenge in terms of activation. The schemes entrances have been increased in scale for both Blocks B and C and is welcomed however fine grain detail is required to show that the proposed site entrances are activated, legible and welcoming for future occupiers.

Landscaping, Public Realm & Outdoor Amenity Space

6.36 The applicant has developed an urban to suburban approach to their landscaping scheme, with the southern end of the site being more urban in nature whilst as the site moves north, this becomes more suburban its approach. This results in a variety of spaces, visual connections through the site and play features which utilising the varying topography.



Figure 12: Proposed Section and Indicative Site Layout of play spaces.

6.37 The landscaping approach has developed well, with connection through the site. SUDS appear to be beginning to be integrated into the design at the front of the site which is welcomed but clarification is required around how these work within the proposed site wider drainage strategy. It noted that the proposed flat roofs provided ample opportunity for green roofs to be integrated into the scheme, to further 'green' the proposal and provide improved drainage strategies.



Figure 13: Emerging Landscaping Masterplan.

6.38 A public art strategy will also need to be outlined and developed, and this could help improve the schemes contextuality. Officers are of the opinion that this should form part of the site wider landscaping strategy rather than being a standalone 'piece of public art'.

Impact on Neighbouring Properties Living Conditions

- 6.39 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 is 920 Purley Way, although the residential amenity of those occupiers located within the consented flats at 29 37 Russell Hill Road as well those east of the development and which front onto Pampisford Road.
- 6.40 No recent daylight and sunlight assessments have been provided accordingly and therefore the applicant will need to demonstrate that this proposed relationship as well as with all other surrounding occupiers would continue to protect the amenities of the adjoining occupiers to an acceptable degree.
 - Privacy, Outlook and Sense of Enclosure
- 6.41 The separation distance between the flank elevation of Block C and 920 Purley Way is approximately 7 metres at its closest point. However, owing to the shape of the proposed blocks and potential internal layout of Block C, officers are of the opinion that all primary facing windows can be orientated away from overlooking 920 Purley Way. It is noted that as currently set out a unit within Block C does have potential to overlook the adjoining occupier and would require alterations accordingly to protect the amenities of this adjoining occupier. Alongside this

further clarification is required to demonstrate that this adjoining occupiers retains acceptable outlook.



Figure 14: Eastern elevation (top), Vu-city views of the proposed developments with surrounding consented schemes (bottom)

Highways and Parking

- 6.42 The site is located on Purley Way, for which TfL are the highways authority. Therefore, they will need to comment accordingly in regards to the acceptability of the impact upon the highway network.
- 6.43 All the car parking spaces to be provided on-site are proposed as wheelchair accessible car parking spaces in line with the draft London plan policies. Given the high PTAL rating, the provision of an otherwise car free development is deemed acceptable. Residents will not be entitled to parking permits and the applicant will be expected to contribute to the further extension of the existing Purley Permit Zone around Russell Hill/Russell Hill Road/More Close to the west of the site as well as a number of other sustainable travel initiatives.
- 6.44 Given the characteristics of Purley Way, and also to ensure that healthy streets and public benefits of the scheme are delivered, notably at the southern tip of the site, a practical servicing strategy will be essential. At current all blocks are proposed to be serviced on-site. The development would require a Construction Logistic Plan, which would be expected to be submitted at draft stage upon application, considering the strategic importance of the road network surrounding the site.

Trees/Biodiversity

6.45 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 stated to date that 24 trees are proposed to be removed across the site (as indicatively shown in figure 13) with the majority of these located within the existing rear gardens of the houses on-site and having little amenity value. It is also notably that the footprint of Block B has been reduced at the rear, so may enable more of the existing trees to be retained since figure 13 was provided.



Figure 15: Existing trees on and off-site (NOTE: proposed block footprint has changed).

6.46 The applicant is proposing to replace those removed with like for like tree replacements. Officers welcome this approach and the consideration of the types of trees to be planted especially within the areas adjacent to Purley Way where they will be provide improved visual amenity to the wider area.



Figure 16: Proposed Tree Strategy

- 6.47 At this stage it is envisaged that planning obligations will be required to mitigate the impacts of the development. 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
 - Sustainable travel
 - Highway works and public realm improvements

7 SPECIFIC FEEDBACK REQUESTED

- 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 PTAL 4/5 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 urban gateway space at the southern tip of the building.
- v. The level of affordable housing and whether an alternative mix to deliver 35% 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 location.