

PART 5: Development Presentations

Item 5.2

1. DETAILS OF THE DEVELOPMENT

Ref: 19/05195/PRE
Location: 550 to 550A Purley Way, Croydon, CR0 4RF
Ward: Waddon
Description: Demolition of existing commercial properties, erection of two blocks, a southern block of 8 storeys, and northern block up to 15 storeys, providing 125 homes including 4 live/work units, with car and cycle parking and associated landscaping.
Drawing Nos: 6851 DAS, 002 J, 003 F, 005 G, 006 G, 007 G, 008 H, 009 G, 010 G, 013 F, 014 F, 015 F, 016 D, 017 B, 0100, 0102, 0201, 0202, 0203, 0204, 0205, 0206, 0400 B, 0401 B, 0402 A, 0403 A, 0404 A, 0410 A, 0500 A, 0501 A, 0502 A.
Applicant: Stonegate Homes Limited
Agent: Nik Smith, Nexus Planning
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 125 homes would make a significant contribution to the council achieving its housing targets. The applicant is currently offering 20 units at

London Affordable Rent, and 16 at Intermediate levels, which is a 30% affordable housing offer by habitable room. This offer will be independently reviewed.

- 3.2 The height of the development, whilst in excess of that set out in Croydon Local Plan (2018) policies, has the potential to form a landmark building that will help define the future development of the Purley Way. The eventual affordable housing offer, along with public realm improvements, will need to be balanced against the exceedance of the tall building policies set out in Croydon Local Plan (2018). Whilst further improvement and justification in regards to the quality of living accommodation and external spaces is required, the development does appear to take a logical approach to massing and bulk. Significant design development (including in regards to landscape design) is needed, with the development needing to take a more refined and nuanced contextual response to the site, design and materiality in order to achieve exceptional design.
- 3.3 The quantum of car parking provision is a fine balance between promoting sustainable modes of transport, and not leading to a development which causes significant levels of parking stress, which in turn either compromises the quality or leads to highway safety issues. Increasing the ratio of space to units is likely to result in the loss of units, which in turn may effect viability and affordable housing provision.

4. SITE BRIEFING

- 4.1 The site subject to the pre-application lies on the western side of Purley Way (A23), 150m south of Five Ways junction, and opposite Harris Primary Academy Purley Way. The site currently consists of two large approximately two storey A1 retail units, which are currently occupied by Halfords and Natuzzi. Parking is located to the front of Halfords store, and to the northern side of Natuzzi. Vehicular and pedestrian access to Halfords is from a shared private road at the southern end that also serves the goods entrance to Wing Yip. Natuzzi store vehicular access is from the centre of the site.

Neighbouring Buildings

The site is situated in a built up area and is surrounded by buildings of differing scale and use.

Morrisons

The warehouse, where Morrisons now reside, was an Iron Foundry built in the 1920s.

1930s Row of Houses

The houses are located fronting onto Stafford Road.

153,155 Stafford Road

A modern flat complex was completed in 2017 and is located adjacent to the 1930s houses.

Wing Yip

Is a large and widely recognised oriental grocer, with a newly extended warehouse and parking facility.

Old Tithe Barn

This building is Grade II listed and is currently used as a place of worship.

Waddon Leisure Centre

The Leisure Centre opened in January 2013, forming part of the Waddon Masterplan.

Harris Primary Academy

The school opened in 2016 forming part of the Waddon Masterplan.

Cottages

The Cottages are adjacent to the south boundary and used for residential purposes



Fig 1 – Site Location Photo (site outlined in red and Wing yip outlined in green)

- 4.2 The area has a mixed character that features two storey residential properties immediately to the south, a seven storey high newly created (as well another building under construction) residential development and school on the opposite (eastern) side of Purley Way, with commercial/industrial uses located to the south, west and north.



Fig 2 – Google Earth 3d image of the site looking west

- 4.3 The site has a PTAL (Public Transport Accessibility Rating) rating of 3 and Purley Way is a classified Red Route.
- 4.4 The sites lies within the Tier II ‘The Mere Bank Archaeological Priority Area’. The Mere Bank was a raised earthwork or dyke which ran in a north south direction between Waddon and Purley, and possibly extended further north into Mitcham Common. The APA has potential for prehistoric finds, and finds related to Croydon Airport.

4.5 The site is located within an area at Flood Risk Zone 1 (low) and is at High Risk (1 in 30 years) from Surface Water Flooding. The site is located in an area where there is potential for groundwater flooding to occur at surface.



Fig 3 – Photos of site

4.6 The application site is not located within a designated conservation area, nor is the building statutorily listed. The development would not impact the setting of any adjacent conservation areas, but it is likely to impact the setting of Grade II listed Old Tithe Barn, Waddon (520 Purley Way), which is to the north of the site.

4.7 The application site is located within the boundary of the emerging Purley Way Masterplan and Local Plan Chapter which identifies this site as part of an area for transformation.

4.8 There is a moderate slope across the site, which slopes south to north.

4.9 The site lies within the Place Specific Policy Area of Waddon (Policy DM49). Whilst the site itself is not allocated, the adjacent Wing Yip site which surrounds the site on its northern, western and southern sides, is allocated in the Croydon Local Plan (2018) as follows:

350: Wing Yip, 544 Purley Way

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Waddon	CR0 4NZ	1.53ha	Wing Yip retail warehouse & car park	Urban	Medium	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community		<p>Potential for a new Local Centre in the Five Ways area of Waddon is identified in the Croydon Local Plan 2018. Over the lifetime of the Croydon Local Plan, reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential and retail use alongside new community and leisure uses. As the site is a scattered employment site, the employment use will need to be retained as a mitigation of the potential loss of employment and as part of any redevelopment, enable inclusion of attenuation SuDS where possible.</p> <p>Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'</p>			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	69 to 260

Fig 4 – Wing Yip Site Allocation in Croydon Local Plan (2018)

Relevant Planning History

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

Planning permission reference 84/01000/P was granted on the 13/07/1984 for the 'Use of premises for the sale of car and motor cycle components.'

Planning permission reference 84/02481/P was granted at appeal for the 'Use as a retail showroom for sale of leather furniture.'

Planning permission reference 04/01414/P was granted on the 09/12/2004 for the 'Variation of condition 2 of planning permission 84/1000/P to allow the sale of furniture, carpets, floorcoverings and electrical and gas products and any other goods which are related and ancillary to the main goods permitted.'

Planning permission reference 04/03573/P was granted on the 20/01/2005 to the Halford's store for 'Alterations to include recladding and installation of mezzanine floor.'

Proposal

4.11 The proposal is currently for the demolition of existing commercial properties, erection of two blocks; a southern block of 8 storeys, and northern block up to 15 storeys, to provide 125 homes including 4 live/work units, with car and cycle parking and associated landscaping.

4.12 The taller element at 15 storeys, sits at the northern end of the site, and has a north south axis that runs parallel to the Purley Way. On the southern side of the site is an 8 storey element, which is located at angle to road, running in a south east to north westerly direction. The two towers are connected with a continuous frontage at ground/mezzanine floor level, with a further set back link at first floor level. To the front of the site at its southern end there would be an enlarged public realm, which is approximately 8.5m wide (11.5m wide including existing pavement).



Fig 5 – 3D CGI of proposed scheme

4.13 At ground floor level at the northern end of the site is the work element of four live/work units, with 'live' element at mezzanine level. Adjacent and looking into the newly created enlarged public realm is ancillary residential space, which sits over ground/mezzanine levels, which is intended to provide breakout, work space and meeting rooms for the residents. To the rear sits a car park for the residential units, which is accessed by a shared service road that runs along the southern boundary. Cycle and refuse stores, with the latter collected from the car park area, also occupy the ground floor level. Residential units are located at first floor level and above. To the western rear edge of the site, principally above the car park area on a newly created podium, sits a communal external amenity space.

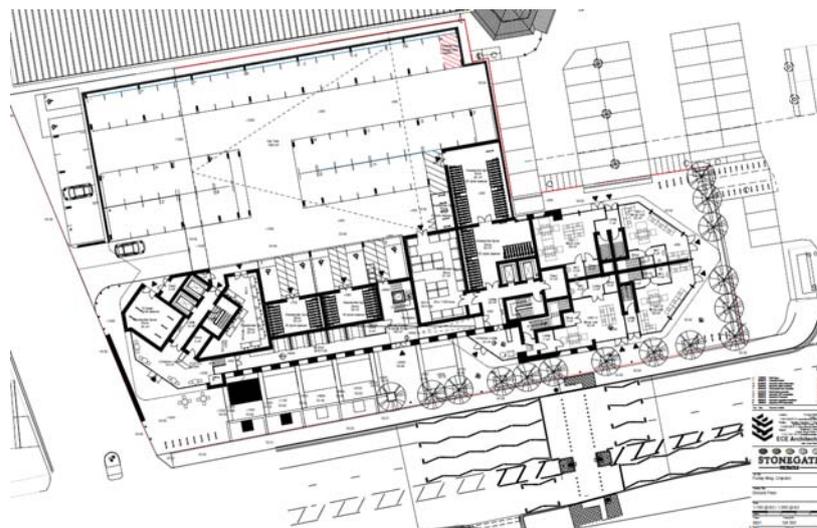


Fig 6 – Proposed Ground Floor Plan

4.14 The proposed residential element is made up of twenty six 1 bed 2 person homes, one 2 bed 3 person homes, sixty seven 2 bed 4 person homes, thirty 3 bed 5 person homes and one 3 bed 6 person homes.

4.15 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 (PRP) on 19th March 2020. The scheme has significantly evolved since the PRP and it is intended to take the scheme back for a second review following this committee.



Fig 7 – Scheme presented to PRP

5.2 The Panel's main comments were:

- Stressed the importance of engaging with the development of the Purley Way Masterplan. The panel hoped that the emerging Purley Way Masterplan could inform aspects of the design, such as access, building height, street frontage, land use etc. through the development of a wider strategic context. Currently the proposal is isolated and more prone to criticism due to the lack of context. The panel understood the justification for the height proposed at present, as a marker for a transition from the Strategic Industrial Land to a more residential area of Croydon. They felt the proposal should be considered as the corner of a much bigger site. Height, massing, and scale were noted as being quite different to the surroundings, which was not necessarily felt to be a bad thing. The panel recommended exploring a lower rise, compact development option as an alternative.
- It was felt that there were strategic moves in the planning of the scheme which were at that stage yet to be resolved, such as the proximity to the adjacent Wing Yip site.
- It was felt that without the context of the masterplan, the justification for the height of the development will have to be well made, which may be made, for example, through bringing on board a high quality commercial

space with an innovative operator, and providing a high amount of affordable housing.

- Raised that commercial spaces under residential developments are often not let because they are badly designed or the wrong use class. It was felt that this was a vibrant commercial quarter on a very busy road, so a commercial use in this location could work, and could act as a destination point, which may help justify the height of the development.
- The panel felt that the design was overcomplicated. They felt that the complexities should be designed out to drive better quality in the rest of the scheme. The form and material approach should undergo simplification, with former be informed by wider masterplan developments. They felt there was a need for a higher proportion of dual aspect units, and a greater rationality to the apartment types.
- Stressed the importance of getting the design of the podium right. It might be through a gesture towards the ground, which could be quite complex, or the podium offered as a great garden space, separated from the noise and bustle of the Purley Way.

5.3 The scheme has evolved in response to PRP's comments as follows:

- The developer has engaged as far as reasonably possible in helping the development of the Purley Way Masterplan, including having met the project team to discuss their site, their proposals and challenges they have faced. This has been of great help to the project team associated with the masterplan. However, both the new Local Plan policy and the Purley Way Masterplan are still at development stages where they cannot be widely shared, including to the developer. It should be recognised that in officers view given the limited land use restrictions, and the need for housing, that the site in question is a potential development site irrespective of the Purley Way Masterplan formulation and hopeful future adoption.
- The applicant continues to test the height in a range of views, and shaped the form of the development so that it more comfortably responds to the context, although further more rigorous testing is still required. The applicant has altered the orientation of the southern block so that it engages with the ground and corner of the site better, and allows smoother transition in scale. There is also greater spacing from the Wing Yip site. The applicant felt that they had already previously explored a compact lower height development, but this was discounted on the basis of unit numbers and/or that compacted form reducing light entering into spaces between buildings.
- The design has been simplified in line with PRP advice, both in form, fenestration and materiality.
- Commercial units, with the exception of work/life spaces, has been removed from the proposal. This in part due to lack of space, heavy servicing/parking demands, and in order to make the scheme simpler in line with PRP advice. Many of the commercial uses explored were not policy compliant.
- The podium has evolved in order to provide residents with additional communal space, to act as an appropriate pleasant green space away

from the busy Purley Way. Further development however is still required in its design and landscaping.

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 with its PTAL rating of 3 (in line with H1) has good access to public transport, local shops and services and is therefore reasonably well placed for high density residential-led development.

Commercial Uses

6.5 The existing A1 retail uses, as they are not located within a designated town centre, are not protected, and therefore no objection is raised to their loss.

6.6 The live/work units would provide some employment opportunities. In addition the communal spaces will help support residents to work from home. Conditions and restrictions through the legal agreement will be required to ensure that the work element of live/work units is marketed, retained and managed in an appropriate way. The current design of the live/work units are as duplexes which directly conjoin the work and live elements. This greatens the risk of tenants using the workspace element as living space / residential conversion. Residential use at the ground floor of the scheme will be unacceptable owing to the poor conditions of the Purley Way (caused by heavy traffic), and the close proximity of the proposed building to the road. It will also create inactive frontage within an areas where an emerging new centre is being proposed (as part of the Purley Way Masterplan), so careful controls will need to be in place as well as active marketing to ensure the units are occupied.

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 an affordable housing offer of 29% by unit and 30% by habitable room, with 20 units provided at London Affordable Rent Levels, and 16 units at Intermediate tenure. With this offer the applicant claims that there would be a deficit of £1.89 million from the benchmark land value. It should be noted that the affordable housing offer was upped on the 01/10/20 from an initial offer of 15%, at a 60:40 split. Due to the recentness of this revised offer the independent review of the viability assessment has not been completed.
- 6.9 It is officers' opinion that the affordable housing offer is the central part of whether a tall building in this location could be supported, and a reduction in offer would fundamentally change the balance consideration of the application.

Unit Mix

- 6.10 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 3 to provide 60% 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.
- 6.11 At present 25% (31 homes) would be three beds, and 54% would be two bed four person (67 homes). This includes live/work units. The proposal would be policy compliant if the exceptions outlined in the policy above are met.

Quality of Residential Units

- 6.12 All of the proposed residential units meet minimum floor space standards set out in the London Plan (2016). There are a couple of exceptions where the proposed development does not meet private amenity space standards. It is understood

that the applicant is targeting full compliance and will develop the design further so that this is achieved.

6.13 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).

6.14 There are a number of single aspect units, six of which are north facing. It is not clear how the applicant has sought to avoid north facing units as far as reasonably possible, nor sought to minimise the number of single aspect units through the design and form of the building. However, officers do accept that in order to maximise the potential of the site, due to its shape and orientation, specifically its narrow shape at its northern end, a certain quantum of the units would inevitably be single aspect. Further work and justification by the applicant on this is required.



Fig 8 - Plan indicated the single aspect units which are either not north facing (yellow dot) or which are north facing (red dot) on typical floorplan.

6.15 A sunlight and daylight assessment has been submitted as part of the pre-application. However this is not complete and only measures up to first floor level. From the limited information provided, all but two rooms appear to have acceptable average daylight factor values, but there are a significant number of living/kitchen/dining rooms that do not meet BRE sunlight guidance. A more comprehensive sunlight and daylight assessment is required, as well as further justification submitted in regards to the orientation of units which accounts for the breach of BRE sunlight guidance.

6.16 In terms of privacy between the units, good window to window relationship are achieved, with the closest point the two buildings being 13m apart. Windows are angled away from each other so as not to result in direct overlooking. Care will be needed in the design of some walkway areas and terraces to ensure that

privacy of the units is safeguarded. The work element of the live/work units is also located purposefully at ground floor level in order to prevent privacy issues which can be problematic when key residential rooms are located at ground level. Concern, however, is raised regarding the mezzanine residential level being fully glazed.

- 6.17 In terms of noise, the development will also need to adopt the 'Agent of Change' philosophy given its close proximity to the busy Purley Way and given the location of adjacent strategic industrial land, placing the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new development. Through appropriate design measures, supported by a robust noise impact assessment, it is expected that this can be demonstrated upon application.
- 6.18 Given the site's location adjacent to the Purley Way, air quality within the units and communal spaces will be a critical factor. A detailed air quality assessment will need to be submitted with the application, with measures such as winter gardens and mechanical ventilation likely to be required.
- 6.19 Further details on the quality of communal amenity space provision will be required to ensure that it is adequately lit, well designed, and accessible and contains high quality child playspace in line with policy.
- 6.20 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

- 6.21 Croydon Local Plan (2018) Policies SP4, DM15 and Place Policy DM49: Waddon are the most relevant policies for considering the principle of a tall building in this location.
- 6.22 Paragraph 6.9 states 'In the context of this policy (i.e. SP4 – key extracts below) is one that is significantly taller than most of the surrounding buildings or in excess of six storeys or 25m.'
- 6.23 Paragraph 6.152 in regards to policy DM15, states 'Tall and large buildings have been defined as those which are significantly taller and larger, in terms of scale, mass and height than the predominant surrounding buildings, causing a significant change to the skyline.'
- 6.24 Paragraph 6.153 states 'When assessing whether a development can be considered to be tall or large, the context within which the building is situated must be taken into account. This would mean that a proposal for six storeys, in

an area where predominant building heights are two storeys, would be considered to be a tall building. In an area where an urban block comprising with narrow frontages, a proposal for a building with a scale that differs from this would be considered to be large.'

6.25 Policy SP 4.5 states:

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

6.26 The site is not within the Croydon Opportunity Area, nor does it lie within a District Centre. However, it is situated within an area of transformation within the emerging Purley Way Masterplan and officers do consider the site to be well connected, with its PTAL rating of 3, and convenient transport links into Central Croydon.

6.27 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”*

6.28 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.

6.29 In terms of the policy, a fifteen storey building would be considered a tall building and as such the above policies are applicable, and the development would run contrary to those policies. Other 'tall buildings' that do not meet the policy requirement (although notably smaller than proposed) have been approved in the vicinity of the site that are up to eight storeys. The site is situated within the emerging Purley Way transformation area which, as highlighted within the Local Plan Review: Issues and Options, will help towards the borough's housing target. Evidence may come forth through the masterplan that may also support the provision of taller buildings than currently found within the local area, albeit the development of the masterplan is still at its preliminary stages and this cannot be given any significant weight.

6.30 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.

Heritage

6.31 In terms of impact on heritages asset, the main impact is likely to be on setting of the Grade II listed Old Tithe Barn. The applicant will submit a heritage assessment with the application which will set out the significance of the asset, as well as consider the impact on the asset. It is acknowledged that the setting of Old Tithe Barn has been compromised by existing built form around it. Whilst the development would cause some harm to the setting of this listed building, principally because of the impact on views from the north with the development in the background, the harm is likely to be minor. Officers feel that it will likely be possible to justify this harm through public benefits that the scheme can derive. A more comprehensive townscape and views testing is required.

6.32 It is understood the application will be supported by archaeological appraisal. Greater London Archaeological Appraisal Service of Historic England would be consulted at application stage.

Massing Approach/Layout/Form

6.33 The proposed tower would form a prominent landmark building, marking the entrance to emerging Five Ways local centre. The building has the potential to add character and visual interest that would be valuable to help create a sense of place, while also informing the future development of Purley Way. A basic model analysis has been provided by the applicant; see extract below. A more detailed and through analysis, including contextual rendering, is advised to be submitted upon application so a full picture of impact on the townscape and long range views can be formed.

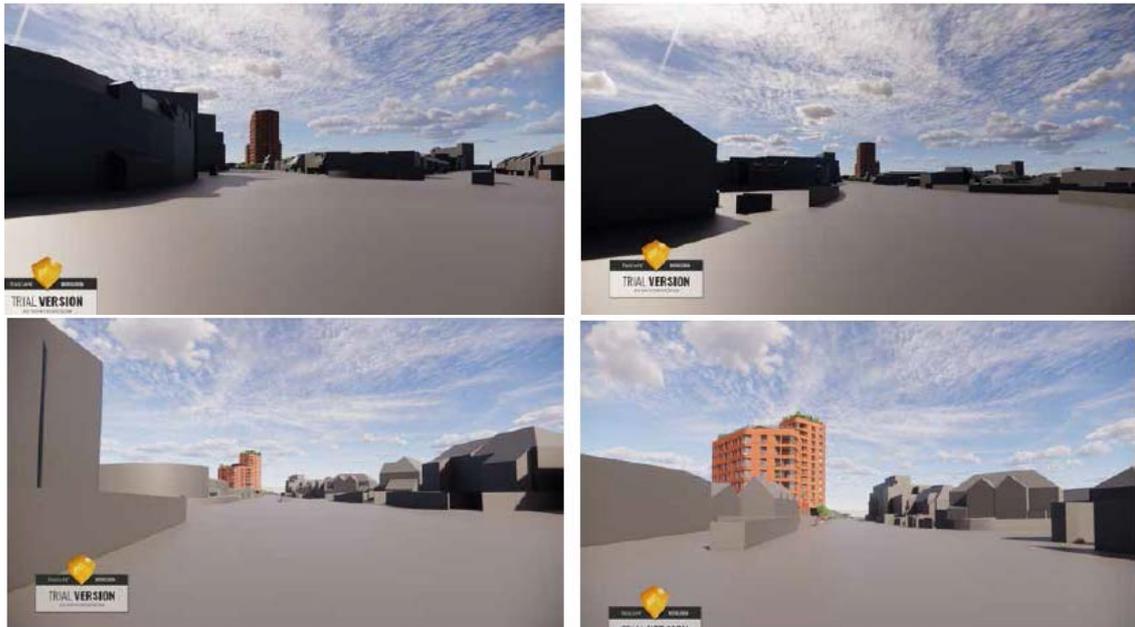


Fig 9 – Views from Applicant's model looking north and south

6.34 The reduced height of the southern tower compared to the northern tower allows a smooth transition in scale in long views from the south. The strong differentiation in height combined with both elements being set at different angles, allows a visually pleasing differentiation that helps break up the massing, whilst also preventing a canyon effect. The irregular shapes of the buildings adds further interest, whilst also helping to soften the edges of the development, reducing the visual impact of the massing.



Fig 10- CGI of the proposed development taken at street level

- 6.35 The southern tower successfully grounds itself much better compared with previous iterations by virtue of its angle, and its set back cantilevered entrance level. A continuous frontage connecting the two towers helps created a defined urban edge and setting to the enlarged public space.
- 6.36 The locations of the buildings, and placement of height at the northern end should ensure that units and private communal areas receive good levels of sunlight and daylight.
- 6.37 The 'link' building between the towers has progressed positively and its form has been rationalised to simplify the form, and address awkward pinch points at the first floor that previous iterations created.
- 6.38 Officers do have some concerns over the sloped roof form of the tallest tower, as it adds further complication, and is somewhat out of character with other tall buildings, including those on the opposite side of the street in Croydon that tend to have flat roofs.
- 6.39 London Plan (2016) policy 3.4 outlines what it considers to be appropriate density of development based on urban type and PTAL rating. The London Plan outlines that this table should not be used mechanistically. This policy should also be used with some caution as it is proposed to be removed under the emerging draft London Plan. For an urban area with PTAL rating of 3, it recommends that development has between 45 to 170 units per hectare. The proposed development is calculated as having 337 units per hectare. This must be considered against a design-led approach (which the emerging draft London Plan endorses over the density matrix) in an area of transformation within the emerging Purley Way Masterplan.

Elevational Treatments

- 6.40 The elevations since the PRP have been on the whole successfully simplified, with a more logical and calmer fenestration pattern that also makes features of the balconies. The material treatment of the building has continually changed since the PRP, with a range of materials explored by the applicant from using different tones of brick to the current iteration that proposes a brick base and terracotta panels. For each of these iterations the applicant has not provided a clear strategy that demonstrates how local character and heritage has informed material choices.



Fig 11 – Images showing design development

6.41 Officers do have concerns about terracotta, as it is not clear how this relates to or has been informed by the existing context and lacks a clear design narrative. The precedents provided to date are of a questionable design quality and do not appear to have been critically analysed. Many of the examples are taken at close range, and it is not clear whether these work on a grander scale. Terracotta is very varied material and can have rich interesting detailing, however the panels shown on submitted CGIs lack variation in tone, texture or detailing. They could give the building quite a commercial appearance, which would be at odds with the residential nature of the intended use and could potentially exaggerate the massing. It is expected that the applicant will further develop their proposal and the scheme presented to committee be more refined than versions presented to date to officers.

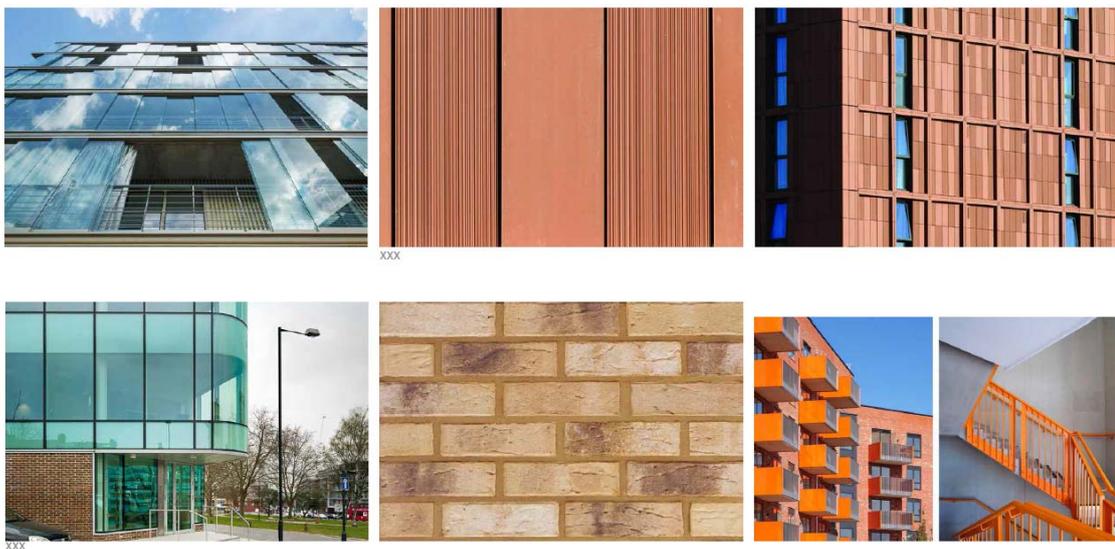


Fig 12- Appearance and Material Precedents Provided by Applicant

Ground Floor Activation and Legibility

6.42 The work element of the live/work units at the north have been designed with large continuous glazed elements, not only to prevent them being easily converted to residential in the future, but also to help provide a level of activity. Although this is a positive design decision, there is still a risk that tenants may cover the glazed façade to enable the reversion of the work space to residential use, potentially creating a messy and inactive frontage. Therefore previous comments around marketing and management of the live/work are still vitally important. Concerns are also raised regarding the practicality of having a fully glazed mezzanine level for the live element.

6.43 At the southern corner is the main lobby area for the southern tower, which adds activity on this prominent corner. Flanking the public space within the connecting element there would be double height space with communal residential areas that are intended to provide work space for residents within the block. This is both a response to changing work patterns, but also to help provide activity. Inactive uses, such as cycle stores and refuse, have been placed centrally within the building and serviced from within the site, to help create an active frontage. However the layout of this communal work space appears compromised and

narrow with poor access. This is primarily caused by the quantum of parking, bin stores and cycle parking, needed to support the proposed number of residential units.



Fig 13 – CGIs showings public realm and internal double height internal communal work areas.

Landscaping, Public Realm & Outdoor Amenity Space

6.44 Positive strategic moves have been made through the design, such as ensuring servicing can take place within the development. This should help create a solid foundation in which a visual pleasing and stimulating public realm and landscaping can be created and start the move away from the current vehicular dominance of the Purley Way.

6.45 At this stage landscaping proposals are quite basic, with spaces in around building lacking a clear contextual narrative or purpose. The latter is problematic given the harshness of the current Purley Way environment and the need for this space to offer a genuine public benefit that can be used to justify the proposed height of the development and support the scheme being a gateway into the emerging Fiveways centre. The landscaping within the public realm, combined with structures such as bicycle stands within it, have not quite achieved a successful balance between creating a permeable green buffer for pedestrians walking through, but also a successful barrier to prevent vehicles entering into this space in an inappropriate manner as can be witnessed in properties opposite. At the moment the landscaping appears too defensive and blocks access for pedestrians which undermines a welcoming engaging public

environment that helps embed this development into its context. The layout of components appears cluttered and creates unnecessary barriers for pedestrians. It is also not clear how the space has been designed to respond to and improve microclimate conditions. Officers have recommended that the applicant seeks inputs from a landscape designer to deliver a clear landscape and public realm strategy which identifies a detailed material and planting palette and layout plan. This should clearly demonstrate a response to local character, complement the building design, and support the function of the different spaces across the scheme.

Impact on Neighbouring Properties Living Conditions

- 6.46 The applicant has submitted a sunlight and daylight assessment, which has been carried out in accordance with BRE guidance. The submitted study demonstrates that the proposed development will not cause an unacceptable loss of sunlight or daylight to existing neighbouring properties.
- 6.47 In terms of Vertical Sky Component (VSC) test, there are only three minor failures to surrounding existing residential properties, a window on nos. 453 to 461 Purley Way, and two flank windows located on the side elevation of no.590. The failing window on nos. 453 to 461 is a bedroom window located at third floor level highlighted below. This window would experience a ratio reduction of 0.7, compared to 0.8 target recommended. The bedroom window sits recessed within a balcony, which makes it overly sensitive to change. BRE notes that guidance should be applied more flexibly in such instances. Officers consider that this bedroom would retain good levels of daylight, and that the marginal breach in VSC value to this window is acceptable. The failing windows on no.590 are located on the flank elevation, but both these windows would retain VSC values in excess of 23%, which is considered good, especially given their location on a flank elevation which makes them reliant on light coming over the applicant’s site. There are currently no known sunlight failures to existing residential properties, but there are failures noted in properties that are currently under construction (see paragraphs below).

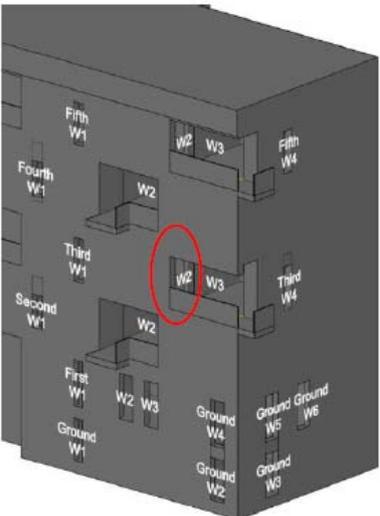


Fig 14 - Showing location of affected window within nos. 453 to 461.

6.48 Opposite the site is no.459 Purley Way, which is currently under construction, but appears to be close to completion. On the basis that this scheme has not been completed or occupied, the applicant has used Average Daylight Factor (ADF) test that applies to new units. Under this test, and once the impact of the balconies has been removed, the applicant states all rooms would achieve 100% compliance. Officers have expressed some reservations over the use of ADF, given that no 459 is close to completion. We have asked the applicant to further justify the impact in terms of VSC/NSL, in the event that circumstances at 459 have changed upon application.



Fig 15 – Showing flank windows of no.590

In terms of sunlight there appears to be two notable failures at 459, but the precise windows and their location are not known. Further information is required on these before further judgements can be made. There is no significant overshadowing of neighbouring gardens due to orientation of the site in comparison to surrounding residential properties, separation distances and nature of surrounding uses.

6.49 In conclusion, at this early stage of the scheme's development it appears to have an acceptable impact on existing properties' sunlight and daylight. The applicant needs to provide further information and justification of the impact on no.459 Purley Way, and the need for this in part will be based on the status of the site at the point of the application's formal determination.

Privacy, Outlook and Sense of Enclosure

6.50 The separation distance between the south elevation of the southern tower and no. 590s' boundary would be 15.5m. The separation distance ensures that there is not an unacceptable loss of privacy, or unacceptable loss of outlook/sense of enclosure, to either no.590s windows or garden. Care will be needed on the design of terraces on the podium to reduce overlooking and ensure good neighbourly relationships. There is a separation distance of over 30m between the towers and properties on the opposite side of Purley Way.

Highways and Parking

- 6.51 The proposed development has the potential to significantly improve the public realm to the front of the site, which would improve the pedestrian environment and is therefore welcomed.
- 6.52 Servicing for the development would be done from within the site's car park which is fully supported. Swept path analysis has been undertaken to show that this is feasible. Servicing from within the site will both ensure high quality public realm to the front helping to promote healthy streets, whilst also ensuring that the operation of the highway, including key bus routes, is not compromised. Officers have expressed some concerns about the lack of servicing and parking for visitors or clients associated with the workspace element of the live/work units as this could affect the marketability and function of these components.
- 6.53 A critical consideration is the level of car parking provision that the development would provide, as it will need to maintain a balance between promoting sustainable modes of transport, but not lead to significant levels of parking stress, which in turn either compromises the quality of development or leads to highway safety issues. The aforementioned issues can already unfortunately be witnessed on the other side of the street, where cars mount the pavement to park in open area in front of nos. 453 to 461.
- 6.54 Census data indicates that car ownership for flats in the ward is 0.56 cars per unit. This would suggest that the development would generate a total parking demand of 70 vehicles. The applicant has also carried out a parking survey, which was taken during the standard weekday night, as well as during the day. The survey area is shown below:



Fig 16- Parking Survey Areas

6.55 The surveys shows the following:

- During the overnight (00:30) parking beats, the overall parking stress across the study area was recorded between 66-68%, with some 64-67 available spaces;

- During the daytime parking stress levels across the study area were observed to be between 62-68%, with some 64-76 available spaces;
- Kings Way recorded consistently high (over 85%) parking stress across all time periods; and
- Queensway recorded a reduced parking stress in the overnight parking beats (43% across both days) and evening (64%) compared to the daytime parking stress of 79% and 86% recorded at 10:00 and 14:00 respectively.

6.56 The survey data is set out over 500m, which is considered too large given the severance effect of Purley Way and the Lambeth methodology states 200m. As a result it is difficult to interpret the data provided by the applicant, but it appears to show that parking stress across the area does vary, but there is some evidence, both within the parking survey and from on site observations, that roads most convenient to the site have a high level of parking stress. This would suggest a more conservative approach to car parking provision on the site may be appropriate.

6.57 The proposed development is proposing 66 car parking spaces, 4 of which would be designated for the live/work units. 7 of the car parking spaces would be designated as Blue Badge parking spaces. 20% of the car parking spaces will be installed with active electric charging vehicle provision, with the remaining 80% passive in line with Draft London Plan standards. There would therefore be 0.53 car parking spaces per unit. The applicant's justification for this level of provision is as follows:

- There is an increasing demand for apartments without car parking provision. This market is supported by younger generations who have different attitudes to car ownership;
- The site is in an accessible location to public transport with bus stops within 150m of the site on Purley Way. This will contribute to lower levels of car ownership and use;
- Waddon Railway Station is some 700m walk from the site. This offers direct and frequent services to destinations including London Bridge, London Victoria, Epsom, Sutton and Croydon;
- The site is a mixed use development and services and facilities will be provided as part of the development. The site is also located within a 'comfortable' walk of a range of services and facilities to cater for everyday needs;
- 49% of households living within flats and maisonettes are car free within the ward where the site is located. This demonstrates the existing market for car free dwellings; and
- To further encourage occupants of the proposed development to adopt more sustainable travel patterns, a Travel Plan will be produced.

6.58 In addition in order to support the proposed level of parking space provision, officers have asked the applicant to explore the provision of a car club bay in the external parking spaces at the southern end of site. It has been calculated by COMO (charity supporting sustainable modes of transport) that for every car club

vehicle, it leads to a removal of 10.5 private cars from the road network. Officers welcome members view on the unit to car parking space provision. However, it is important to note that if member's direction is to increase the level of parking provision per unit, the most likely responses to that will be to either drop unit numbers or increased building costs, which in turn could potentially reduce viability. It should also be noted that TFL/GLA will be a statutory consultee on the application and generally seek a low level of car to unit provision.

- 6.59 Pre-application discussion with TFL have been undertaken given the site's location on a red route. Many of their comments have been taken into account in the scheme, including the loss of on street/within the public realm servicing bay. TFL have also accepted the unit to parking space ratio. They have requested a Parking Management Plan, which would be securable via condition.
- 6.60 Officers have expressed concerns regarding the location, pedestrian route to the building and visibility of cars reversing out of the space from the disabled parking bays located at the south western corner of the site.

Trees/Biodiversity

- 6.61 There are no known trees on the site which could be impacted by the proposed development. There is a significant potential through landscaping to provide substantial tree planting, which could help make significant contribution to the public realm and the quality of communal amenity space being provided. In addition, there is also potential for substantial increase in urban greening. This could be a potential significant benefit to the scheme, but to date, the applicant's landscaping proposal are not sufficiently developed to ensure that benefit is fully realised. A more nuanced and detailed approach to landscaping is required and is expected to be developed by the applicant prior to application.

Other Considerations

- 6.62 An initial desktop based wind study has been provided which has identified several areas in which the scheme needs to further develop in order to ensure good standards of wind conditions. It does not appear to have accessed the wind conditions within the newly created public realm. Measures identified that may be required include:
- Wind conditions on the footpath are currently (under the existing condition) only suitable for strolling. Further mitigation in the form of additional landscaping along the footpath may be required.
 - Some further mitigation at the entrances of the southern building may be required.
 - Wind on the external amenity spaces at podium level, level 2 and at 12th floor level may exceed sitting comfort levels. Mitigation in the form of horizontal shielding and windbreaks, and increased balcony balustrade heights are likely to be required.

- Upper level balconies are likely to exceed sitting comfort conditions, so mitigation measures in the form of louvres, screens or winter garden is likely to be required

6.63 The submitted wind study at this early stage is relatively basic, and more detailed testing, including wind tunnel testing, will be required upon application. Clearly the factors above will need to be factored into the design and elevations going forward.

6.64 Major residential schemes are required to meet Zero carbon. Non-residential buildings should achieve a 40% carbon dioxide emissions reduction over the Target Emissions Rate (TER) set out in the Building Regulations (2010). The London Plan Sustainable Design and Construction SPG (2014) sets out that this is broadly equivalent to a 35% reduction over the 2013 Building Regulations Part L, which is the most up-to-date standard.

6.65 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. Due to ground water flooding risk, the development would need to pass a sequential test, and failing that an exception test.

6.66 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
- Sustainable transport contributions
- Public Realm improvements and maintenance
- Highway works
- TFL contributions and associated clauses.

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 tall building in this location and whether a departure from the Local Plan could be justified through the affordable housing offer and other benefits the scheme will bring
- ii. The current height, mass, design and elevation details of the development

- iii. The site layout, including enhanced public realm proposals
- iv. The current level of affordable housing.
- v. The likely impact on neighbouring living conditions.
- vi. Whether the level of car parking provision per unit (0.4 per unit) is appropriate, and if not, how the development should appropriately respond to this.

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.