

**1 SUMMARY OF APPLICATION DETAILS**

Ref: 20/06224/FUL  
Location: 922 - 930 Purley Way, Purley, CR8 2JL  
Ward: Purley and Woodcote  
Description: Demolition of existing 5 residential dwellings and erection of residential development formed of 3 blocks of flats ranging from 6 - 10 storey's comprising 141 flats with associated land level alterations, landscaping, access, cycle and car parking  
Approved: See Appendix 1  
Documents:  
Applicant: Justin Homes (Purley Way) Ltd  
Agent: Icen Projects Ltd  
Case Officer: Tim Edwards

1.1 This application was originally presented to Planning Committee on 25<sup>th</sup> February 2021. The original committee report for the application is included as Appendix 3.

1.2 The Planning Committee deferred making a decision on the application so the applicant could address the following points:

- Allow further discussion of the 3-bed and larger units
- Improve the tenure split to be a closer 60/40 split in favour of rented accommodation;
- Review of the height of the development.

1.3 The proposal has since been amended in response to the deferral with the main alterations highlighted below:

- Reduced the height of Block A from 12 to 10 storeys;
- Reduced the number of homes from 155 to 141;
- Increased the number of 3 bedroom homes (from 14 to 37);
- Increased the provision of affordable rented accommodation offered as part of the affordable homes offer (previously proposed to be 35% by habitable rooms overall with the tenure mix of 70% - London Shared Ownership and 30% - London Affordable Rent). The proposed overall affordable homes offer would remain at 35% by habitable room with the tenure mix now 64% - London Shared Ownership and 36% - London Affordable Rent.



*Figure 1 – Originally submitted scheme at 12 Storeys (left) and the now proposed reduced 10 storey height of Block A (right)*

- 1.4 It is noted that since the scheme was presented to Planning Committee, the London Plan 2021 has been adopted. An updated list of relevant development plan policies and Supplementary Planning Guidance (SPG)/ Documents (SPD) are listed in the appendix 2 of this report.
- 1.5 This application was originally reported to Planning Committee in accordance with the Committee consideration criteria:
- The scheme was referred by Councillor Quadir
  - The scheme was referred by the Director of Planning and Strategic Transport.
- 1.6 It is noted that following re-consultation on the scheme following the proposed deferral from planning committee the proposal is also being reported to Planning Committee in accordance with the following committee consideration criteria:
- The scheme was referred by Chris Philp MP.
  - Objections above the threshold in the Committee Consideration Criteria

## **2 RECOMMENDATION**

- 2.1 That the Planning Committee resolve to GRANT planning permission subject to:
- A. Any direction by the London Mayor pursuant to the Mayor of London Order

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

- 1) 35% Affordable Housing provision (35% London Affordable Rent, 65% London Shared Ownership)
- 2) Air quality contribution of £14,400
- 3) Local employment and training strategy (construction) including a financial contribution of £95,000
- 4) Zero Carbon off-set contribution of £113,620
- 5) Sustainable transport contributions including towards off-site car clubs and car club memberships for future occupiers of £112,500
- 6) Car parking permit free restriction for future residents
- 7) Travel Plan and monitoring
- 8) Public realm and highway works to ensure safe ingress and egress onto Purley Way
- 9) Section 278 agreements
- 10) Green Travel Plan
- 11) Retention of scheme architects, both in relation to the buildings and the landscaping respectively (or suitably qualified alternative architect)
- 12) TV and digital mitigation
- 13) Monitoring fees and payment of legal fees
- 14) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate detailed terms of the legal agreement, securing additional/amended obligations if necessary.

2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

### **Conditions**

- 1) Commencement within three years (compliance)
- 2) Approved Plans (compliance)
- 3) Construction and Environmental Management Plan (prior to commencement)
- 4) Archaeology (prior to commencement)
- 5) Biodiversity – bat licence (prior to commencement)
- 6) Contamination (prior to commencement)
- 7) Remediation Strategy (Prior to commencement)
- 8) Piling (prior to specific works)
- 9) Aviation warning lights, construction and on building (prior to commencement)
- 10) Detailed fire safety measures in accordance with Fire Safety Strategy (prior to superstructure)
- 11)

- 12) Typical façade materials/detailing – 1:20 details used to produce 1:1 mock-ups, with 1:5 details to confirm following approval (prior to superstructure)
- 13) External facing materials, including physical samples and detailed drawings of design elements (prior to superstructure)
- 14) Sample panels on site (prior to superstructure)
- 15) Balcony and balustrading design (including those requiring additional wind mitigation owing to their location) (prior to superstructure)
- 16) Wind tunnelling and mitigation measures outlined with detailed landscaping scheme (prior to superstructure)
- 17) Public art (prior to superstructure)
- 18) Hard and Soft Landscaping details of all Public Realm, communal amenity spaces and Children’s Play Spaces (prior to superstructure)
- 19) Biodiversity enchantment strategy including lighting design. (prior to superstructure)
- 20) Landscape and public realm management plan(prior to occupation)
- 21) Flues and Ventilation (prior to occupation)
- 22) Façade maintenance and cleaning strategy (prior to occupation)
- 23) Landscape and public realm management plan (prior to occupation)
- 24) Biodiversity (prior to occupation)
- 25) Public Realm and External Building Lighting (prior to occupation)
- 26) Delivery and Servicing (prior to occupation)
- 27) Car Park management plan (prior to occupation)
- 28) Refuse storage (prior to occupation)
- 29) External Noise Mitigation (prior to occupation)
- 30) Hard and Soft Landscaping details of Public Realm and Children’s Play Spaces (prior to occupation)
- 31) Step free access to all amenity spaces shall be provided to all future occupiers regardless of tenure (compliance),
- 32) The ‘pocket park’ between Blocks B and C shall be publicly available (compliance)
- 33) Detailed Surface Water Drainage Scheme (compliance)
- 34) Tree Protection (compliance)
- 35) Water use (compliance)
- 36) Noise limits (plant) (compliance)
- 37) Secured by design (compliance)
- 38) Accessible Homes (M4) (compliance)
- 39) Lifts (compliance)
- 40) Electric charging (compliance)
- 41) Cycle Storage (compliance)
- 42) All features and materials must comply with Part B of the Building Regulations in relation to fire safety (compliance)
- 43) Submitted Air Quality assessment (compliance)
- 44) Thames Water (Protection and upgrade of water supply infrastructure)
- 45) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

## **Informatives**

- 1) Granted subject to a Section 106 Agreement;
  - 2) Community Infrastructure Levy;
  - 3) Code of practice for Construction Sites;
  - 4) Nesting birds in buildings/trees;
  - 5) Light pollution;
  - 6) Requirement for ultra-low NOx boilers;
  - 7) Thames Water informatives regarding underground assets and public sewers;
  - 8) Highways informative in relation to works required.
  - 9) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.
- 2.4 That the Planning Committee confirms that it has had special regard to the desirability of preserving the settings of (including views of) listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.5 That the Planning Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the settings (including views of) of the Central Croydon Conservation Area, the Croydon Minster Conservation Area and the Chatsworth Road Conservation Area as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF.
- 2.6 That, if by within 6 months of the planning committee meeting date, the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

## **3 LOCAL REPRESENTATION**

- 3.1 The application has been publicised by site notices, a local press notice, and letters to Neighbours. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows (noting that multiple representation were received from the same person). This total also includes the additional late representations which were summarised within the addendum prior to the scheme being presented to Planning Committee on 25<sup>th</sup> February:

No of individual responses: 59 Objecting: 59 Supporting: 0

The following issues raised by the additional representations and not included within the original report as summarised below. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Summary of objections	Response
Loss of Light to Coldharbour Lane	Coldharbour Lane is currently heavily planted and includes large mature street trees. Whilst there would be some impact on this route, there would be natural surveillance of this existing route created by the proposal which would improve this public route.
Impact upon parking pressure in Russell Hill Road, potentially leading to residents parking on Coldharbour Lane	Russell Hill Road, directly adjacent to the rear of the site is located within the Purley Permit Zone. Whilst some of the wider area currently sits outside of the permit zone, as part of the developments approved at 29 - 35 Russell Hill Road i.e (ref. 19/03604/FUL) a financial contribution was secured via s106 to allow a review of the surrounding streets and the controlled hours of parking to inform future CPZ provision. In relation to residents parking within Coldharbour Lane, whilst this does allow access to existing garages, this is a public bridleway and this could be enforced through additional signage and bollards, which can be secured via s278 agreement.
Given the scale of the development, the application over the Christmas period with little/no publicity is very dubious	The application has been consulted upon in line with statutory and local legislation/guidance. This included neighbour notification letters being sent to 67 of the closest adjoining occupiers (originally) and subsequent re-consultation with all those neighbours and anyone that has commented on the proposal, email notification to local Councillors and MP as well as press notices being included with the local press and site notices being erected surrounding the site.
The air quality document in this application is not applicable. No assessment was made anywhere near the site	The air quality assessment has been assessed accordingly and is considered to have been conducted in accordance with national regional and local legislation/guidance and is further

	discussed within paragraphs 4.26 – 4.31 of this report.
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3.2 As set out by paragraph 1.5 Chris Philp MP has objected to the proposal following the re-consultation on the amended plans and referred the application to planning committee for the reasons set out below:

1. Substantial concerns regarding the level of built form and quantum of development proposed which would appear cramped and excessive - It would fail to integrate successfully within the immediate surroundings and would be detrimental to the street-scene,
2. The proposal for three blocks of accommodation – a 10 storey, a 9 storey and a 6 storey building - is completely out of character with the local area in terms of style, height, density, size, footprint and massing.
3. Lack of any significant balancing in the visual impact of the transition stepping from 10 to 9 to 6 storeys and thus detrimental to the streetscene
4. The proposal to build 141 homes on a site currently hosting 5 houses constitutes very considerable over-development and completely fails to respect the character of Purley
5. 10 storeys is still far too high for this site and completely out of character with the local surrounding area.
6. The proposal for a 10 storey block falls into a tall building category. Croydon Local Plan only allows for one high rise building in Purley and that has been taken by the approval of **16/02994/P** – Purley Baptist Church
7. The three blocks of flats proposed fail to respect the transition from an urban to a suburban character.
8. Poor quality amenity for occupiers of some of the proposed units in terms of accommodation and environment
9. Poor landscaping design within the scheme; inadequate children's play area and quality amenity space
10. Inadequate information on air quality for occupiers
11. No car parking provision for residents and visitors – other than 6 Blue Badge holder spaces

#### **4. MATERIAL PLANNING CONSIDERATIONS**

4.1 The main planning issues detailed additionally since Planning Committee deferral are set out below:

- Unit Mix
- Tenure Mix
- Height of the development
- Housing Quality
- Landscaping and Biodiversity
- Fire Safety

- Air Quality

### Unit Mix – 3 bedroom units.

- 4.2 The scheme when original presented to Planning Committee on 25<sup>th</sup> February was as such:

	1 bed		2 bed		3 bed		Total
	1p	2p	3p	4p	4p	5p	
<b>Market Housing</b>	11	61	0	36		3	111
<b>Affordable Rent</b>		5	0	4	4	1	14
<b>Intermediate</b>		16	0	8	3	3	30
<b>All Tenures</b>	<b>93</b>		<b>48</b>		<b>14</b>		<b>155</b>

Table 1 – Unit Mix as presented on 25<sup>th</sup> February

- 4.3 The scheme unit mix has now been amended and is now proposed as such:

	1 bed		2 bed		3 bed		Total
	1p	2p	3p	4p	4p	5p	
<b>Market Housing</b>	9 (-2)	54 (-7)	0 (-)	19 (-17)	18 (+18)	0 (-3)	100 (-11)
<b>Affordable Rent</b>	1 (+1)	4 (-1)	0 (-)	2 (-2)	7 (+3)	1 (-)	15 (+1)
<b>Intermediate</b>	2 (+2)	11 (-5)	0 (-)	2 (-6)	10 (+7)	1 (-2)	26 (-4)
<b>All Tenures</b>	<b>81 (-12)</b>		<b>23 (-25)</b>		<b>37 (+23)</b>		<b>141 (-14)</b>

Table 2 – Unit Mix now proposed with alterations from 25<sup>th</sup> February shown.

- 4.4 As set out by Policy, DM1 requires appropriate housing choice for sustainable communities and within urban areas of high public transport accessibility, states that at least 40% of units should have three or more bedrooms.
- 4.5 The proposed unit mix would now include 26% of the units with three bedrooms. This is up from the previously presented 9% provision of 3 bedroom units (which was supplemented by 31% 2b, 4p units and in compliance with Policy DM1 which until the end of February 2021 supported the replacement of 3 bedroom units with 2 bedroom, 4 person units subject to viability).
- 4.6 It is noted that the now proposed provision does not meet the policy as set out, however officers are mindful of the previous deferral and that the scheme was developed, submitted and considered prior to the February 2021 change in policy position. As such, this suggests that some flexibility should be provided on this matter. Additionally, and arguably more tellingly, the changes to the scheme post deferral have reduced the height, reduced the number of units, increased the amount of London Affordable Rent accommodation and increased family units. All

of these changes decrease the developers return on the development and a balance needs to be struck between housing delivery, affordable housing delivery and family housing delivery. Officers are satisfied that the proposed level of family housing is acceptable on this basis taking into account the specific individual circumstances of this application are considered acceptable on balance.

- 4.7 Alongside this, a letter of support has been received from Optivo which sets out that they are currently in advanced stages to purchase the site as a whole delivering it as a 100% affordable development solely as affordable rented homes (although as set out below the application will only be securing 35% of the development by habitable rooms through the s106). Optivo have also set out that they prefer to minimise 3 bedroom properties and therefore this is of note to the proposed unit mix set out.

### **Tenure Mix**

- 4.8 The proposed scheme was originally presented to planning committee with 35% of the overall development, by habitable rooms, proposed to be affordable homes comprising 30% London Affordable Rent (LAR) and 70% London Shared Ownership (LSO) accommodation. This equates to a 30:70 (LAR:LSO) split which does not accord with local Policy SP2 (which sets out a provision of 60/40% split) but which did accord with the Mayor's Affordable Housing SPG which sets out that tenures in a Fast Track application, such as this, are acceptable if they meet a ratio of 30:30:40 (affordable rent: intermediate: tenure to be agreed with local planning authority), which this scheme did, although members expressed concern with the level of affordable or low cost rent units in the scheme The proposed quantum of affordable housing was considered to weigh significantly in favour of the scheme and to be a public benefit to the overall scheme.
- 4.9 The application now proposed continues to offer 35% of the overall development by habitable rooms as affordable rent but with an improved 35% London Affordable Rent (LAR) and 65% London Shared Ownership (LSO) split (36:64 improved from 30:70). Taking into account the scheme had already been shown not to be viable to provide any affordable housing on-site, that the scheme has been reduced in overall unit numbers, that more family units are proposed and that Block A has been reduced by 2 storeys which reduced the number of the most valuable units, this is considered to represent a good affordable housing offer. It should also be noted that the London Plan 2021 has been adopted since the previous report to Planning Committee. Policy H6 enshrines a tenure split of 30:30:40 in policy (as opposed to in Supplementary Planning Guidance) and supersedes the local policy. The proposed affordable housing offer is in accordance with this tenure split requirement and so accords with policy.
- 4.10 Taking into account the now improved affordable housing offer, the proposed quantum of affordable housing continues to be considered acceptable and to weigh significantly in favour of the scheme and the public benefit it offers overall.

### **Height of the Development**

- 4.11 It is important to reiterate the policy position of the proposal, especially noting the adoption of the London Plan 2021, which was still in draft form when this application was original presented to planning committee in February 2021.
- 4.12 London Plan Policy D9 (Tall Buildings) states that 'Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London. The relevant point of the policy (part 3) goes on state that Tall buildings should only be developed in locations that are identified as suitable in Development Plans.
- 4.13 Supporting text within paragraph 3.9.3 states that tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should define what is a 'tall building' for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable and such proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.
- 4.14 Policy SP4.5 of CLP 2018 sets out that tall buildings will be encouraged in the Croydon Opportunity Area, areas in District Centres, locations in areas well connected to public transport interchanges and where there are direct physical connections to one of the above. Policy SP4.6 is also of note and applications for tall buildings will be required to: respect and enhance local character/heritage assets, minimise environmental impacts, respond sensitively to topography, make a positive contribution to the skyline and image of Croydon and include high quality public realm in their proposal.
- 4.15 When considered in relation to this proposal, the relevant parts of Policy DM15 set outs that tall or large buildings must respect and enhance local character proposals and will be permitted where they are located in place specific areas as outlined by policies DM24 – DM49, located in a minimum Public Transport Accessibility Level (PTAL) rating of 4, of exceptional design quality and that the building height, footprint and design relates positively to any nearby heritage assets.
- 4.16 The relevant place specific policy of the CLP 2018 is DM42.1 which details that within Purley District Centre and its environs developments should complement the existing predominant building height of 3 to 8 storeys with a potential for a new landmark building of 16 storeys. It is important to note the accompanying text to Policy DM42 which states that the district centre and its environs has a varied topography which presents opportunities for tall buildings.
- 4.17 It is clear that the proposed landmark building which Policy DM42.1 relates to has been approved as part of the Mosaic Place / Purley Baptist Church scheme. However, it is important to separate the two points of "how a building complements

the existing building heights” and “a landmark building”. This proposal having been reduced in its maximum building height for Block A from 12 to 10 storeys ensures this does not create a separate landmark building and therefore does not compete with Purley Baptist Church and the policy allocation.

4.18 The site now includes three blocks of 6, 9 and 10 storeys with the approved schemes within Russell Hill Road to the west of the site (as highlighted in the relevant planning history of the original officer report) being up to 8 storeys in height and set at a higher land level. Therefore buildings with the proposed height of 6, 9 and 10 storeys are considered to be appropriate with their response to the emerging character stepping down to the north where there is a more suburban context. The 6 and 9 storey building (Blocks C and B respectively) in this location would be considered to complement this predominant building height and fully accord with policy DM42.1 highlighted in 4.14. The deferral from Planning Committee did not express significant reservations with the heights of buildings B and C.

4.19 However, a 10 storey block would continue to be considered a departure from policy, when considering the place specific policy, DM42 from the Croydon local Plan 2018 and D9 from the London Plan. As set out previously:

*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 in Directions 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.*

4.20 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 this case, the site meets many of the criteria’s set out by both the strategic and detailed Tall Building policy. It is located in an area with good access to public transport (PTAL 4/5), as well as local shops and services within the District centre. As discussed below the proposal is considered to be of exceptional design quality when considered holistically and whilst the proposal is considered to cause less than substantial harm to the grade II Purley United Reform Church’s setting and that such harm is outweighed by public benefits (detailed within points 9.39 – 9.57 heritage section of the original officer report).



*Figure 2: Amended Eastern Elevation facing towards Purley Way*

- 4.21 As set out by Policy D9 of the London Plan and of which is now a material consideration (linked to DM15 of the Croydon Local Plan 2018), whilst the proposal would not meet this criteria, the stage 1 referral received by the GLA, when the scheme was proposed at 12 storeys set out:

*“At 12 storeys, Block A would represent a step change in the height in the edge of town centre context. However, given the effect of the site’s topography, this is a modest adjustment which does not adversely impact on local or strategic views as demonstrated in the supporting HTVIA... The proposed height strategy optimises the site whilst moderating the difference between the low-to mid-rise surrounding contexts. Noting the positive evolution of the scheme in response to pre-application and design review processes, and having regard to the urban design and residential quality considerations within this report more generally, the proposed height could be supported.”*

- 4.22 The three buildings proposed as part of the development are designed to step down in height (from 10 to 9 and then 6 storeys), south to north, responding to the site’s location between urban (Purley District Centre) and its evolving suburban residential contexts with the proposed developments on Russell Hill Road to the west of the site currently under construction. Whilst the proposed alteration in height for Block A does alter the way in which the development would be read within the streetscene, this response is directly linked to proposed reasons for deferral and taking into account the high quality landscaping scheme and the proposed design response to the surrounding areas evolving nature, overall the proposal is considered to be of holistically exceptionally designed. To ensure that Block A and Block B are not read as one bulk, variations to the tonal brick work have been employed alongside the geometric shapes which form the basis for the blocks original design intent continuing to ensure that the proposal reads as three distinct but linked buildings. The reduction in height alongside these proposed design moves aid the development in responding to the site and its surroundings both from a townscape and massing perspective.



*Figure 3: View looking west towards the site.*

### **Housing Quality**

- 4.23 Owing to the three proposed alterations set out above, primarily the increase in the number of three bedroom units, the internal layouts of the blocks have changed to accommodate these larger units. All units would continue to provide good quality living accommodation, with no single aspect north facing units proposed throughout the development.
- 4.24 An updated daylight, sunlight and overshadowing assessment addendum has been submitted which details that due to the proposed internal alterations to increase the number of three bedroom homes, living/kitchen and dining spaces within 2 (C.1.2 and C.2.2) of 141 units now proposed have been altered and would now fail to receive the annual level of sunlight during the summer months owing to the recessed nature of the balconies and primary windows within that recess. Whilst this is regrettable, considering that these living spaces are dual aspect and would receive the recommended level of sunlight during winter months overall this is considered acceptable on balance.

### **Landscaping and Biodiversity**

- 4.25 Since the scheme was previously presented to committee, the London Plan has now been adopted and therefore the proposals requirement to meet Policy G5 in regards to the urban greening factor. The proposal would meet the recommendations of the policy in meeting the target score of 0.4 for predominately residential, by achieving an Urban Greening Factor (UGF) figure of 0.41.

- 4.26 In line with this point, the proposal has been submitted with a detailed ecology appraisal. The ecology appraisal identifies that 930 Purley Way supports bats and therefore as a European Protected Species Licence is required prior to commencement and is proposed to be secured via condition.
- 4.27 The site is also noted to currently have 9 invasive species and 3 species of special concern which are considered to be detrimental to the ecological value of the site and are proposed to be removed further improving the potential ecological benefits of a scheme on this site. The proposal also includes biodiversity net gains on site in the form of new planting, bat boxes, bird boxes and green/living roofs throughout all 3 of the blocks in line with policy G6 of the London Plan.

### **Fire Safety**

- 4.28 In line with Policy D12 of the London Plan, a fire statement has now been provided with details fire detection, alarm system and evacuation strategy, means of escape and structural protection. The statement has had regard to materials and methods of construction and information pertaining to external fire spread. The details have been reviewed by the Councils Building Control department who consider the proposed strategy acceptable subject to the other relevant legislations that will be expected of the applicant and a condition is recommended to control the detailed design. The fire strategy will also form of the stage 2 submission to the GLA for their comment also.

### **Air Quality**

- 4.29 Late representations were received prior to the application being presented to planning committee on 25<sup>th</sup> February and have again been made in relation to the proposed developments lack of information in regards to air quality as well as the general acceptability of this.
- 4.30 As part of the application, an air quality assessment has been submitted and assessed. The study area for the assessment has been identified using professional judgement, focussing on the areas where impacts are anticipated to be greatest. Specifically, the assessment has mainly focussed on Purley Way and the gyratory on the A23 to the south of the proposed development, and sections of Brighton Road, Pampisford Road and High Street. Concentrations of nitrogen dioxide, PM10 and PM2.5 have been predicted at a number of locations within the proposed development. Receptors have been identified to represent a range of exposure, including worst-case locations (these being at the façades of the residential properties closest to the sources).
- 4.31 Seventeen residential receptor locations have been identified within the new development, which represent exposure to existing sources. In addition, concentrations have been modelled at the diffusion tube monitoring site (CY41)

located at the Brighton Road/Old Lodge Lane junction, in order to verify the model outputs. This is correct and typical for an air quality assessment.

- 4.32 Concentrations have been predicted using the ADMS-Roads dispersion model, using traffic data, and vehicle emissions derived using Defra's Emission Factor Toolkit (EFT) (v10.1) (Defra, 2020b). This is the industry standard model.
- 4.33 The assessment has considered the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction and emissions from road traffic generated by the completed and occupied development. It has also identified the air quality conditions that future residents will experience and whether or not the proposed development is air quality neutral (as required by the London Plan).
- 4.34 The assessment was conducted in accordance with national, regional and local legislation and guidance. The methodology and approach was standard, and correct as agreed by the Pollution Control Officer. The predicted annual mean pollution concentrations are accurate. The assessment has recommended mitigation measures as required, during the construction phase.

## **Conclusion**

- 4.35 The proposed development would introduce a significant amount of new housing, including a mix of unit sizes and genuinely affordable housing in the form of London Affordable Rent units, as well as London Shared Ownership units. The proposed development is of a high quality design and would ensure a good standard of accommodation for new residents and their neighbours. There would be harm to heritage assets, but that harm is considered to be minimised and necessary to deliver the development's benefits (and therefore is justified), and the harm caused would be outweighed by the development's public benefits. The development would be a car-free, environmentally sustainable development and would comply with the aspirations of the Development Plan. The proposal constitutes a departure in a limited fashion, but this is outweighed by other material considerations. The residual planning impacts would be adequately mitigated by the recommended s.106 obligations and planning conditions.
- 4.36 The scheme has been amended to respond to the deferral from Planning Committee with an increase in the number of family homes, an increase in the affordability of homes and a reduction in the massing to respond to townscape terms.
- 4.37 All other relevant policies and considerations, including equalities, have been taken into account.
- 4.38 It is recommended that planning permission is granted in line with the officer recommendation for the reasons summarised in this report (and original officer report highlighted).



## Appendix 1: Approved documents

### Plans:

Drawing No	Plan Title	Revision
D1000	Existing location plan	00
D1100	Existing site plan	00
D1700	Existing elevations	00
D6100	Proposed G.A. Plan Ground floor	01
D6101	Proposed G.A. Plan Level 01	01
D6101	Proposed G.A. Plan Level 02-05	02
D6106	Proposed G.A. Plan Level 06	01
D6107	Proposed G.A. Plan Level 07-08	01
D6110	Proposed G.A. Plan Level 10	01
D6150	Proposed G.A. Plan Roof Plan	01
D6199	Proposed G.A. Plan Lower Ground Floor	01
D6200-A	Block A Floor Plan Level 00 – Ground	01
D6200-B	Block B Floor Plan Level 00 – Ground	02
D6200-C	Block C Floor Plan Level 00 – Ground	02
D6201-A	Block A Floor Plan Level 01	01
D6201-B	Block B Floor Plan Level 01	02
D6201-C	Block C Floor Plan Level 01	02
D6202-A	Block A Floor Plan Level 02 – Level 11	01
D6202-B	Block B Floor Plan Level 02 – Level 08	02
D6202-C	Block C Floor Plan Level 02 – Level 05	02
D6299-A	Block A Floor Plan Level 00 – Ground	02
D6500	Site Section proposed	01
D6520	Block B Proposed Section	01

D6710	Site Elevations Proposed	01
D6711	Site Elevations Proposed	01
D6720	Block A proposed Elevations	01
D6721	Block A proposed Elevations	01
D6722	Block A proposed Elevations	01
D6723	Block A proposed Elevations	01
D6726	Block B proposed Elevations	01
D6727	Block B proposed Elevations	01
D6728	Block C Proposed Elevations	01
D6729	Block C Proposed Elevations	01
D6750	Materials and Architectural Details Block A	01
D6751	Materials and Architectural Details Block B	01
C0115 L099	Lower ground floor general arrangement plan	1
C0115 L100	Ground floor general arrangement plan	1
C0115 L101	1 <sup>st</sup> floor general arrangement plan	1
C0115 L120	Combined roof plan	1
C0115 L999	Lower ground floor illustrative masterplan	1
C0115 L1000	Ground floor illustrative masterplan	1
C0115 L1001	1 <sup>st</sup> floor illustrative masterplan	1
C0115 L1200	Combined roof plan illustrative masterplan	1
C0115 L500	GF Sections Sheet 01 of 01	1
C0115 L501	GF Sections Sheet 02 of 02	1
C0115 L1300	Urban Greening Factor Landscape Areas	00
CCL 10520 TCP	Tree Constraints Plan	2
CCL 10520 IAP	Impact Assessment Plan	2
CCL 10520 TPP	Tree Protection Plan	3

### **Documents:**

- Covering Letter

- Update Covering Letter
- Amendments Covering Letter received 22/07/21
- CIL Forms
- Planning Application Form
- Planning Statement
- Design and Access Statement
- Landscape Design and Access Statement
- Energy Strategy v2
- Daylight Sunlight v2
- Daylight, Sunlight and Overshadowing Assessment Addendum.
- Air Quality Report v2
- Archaeological Written Scheme of Investigation
- Archaeological Desk Based Assessment
- Ecological Appraisal
- Flood Risk Assessment and SuDS Strategy
- Croydon SuDS proforma
- SuDS developer checklist
- Health Impact Assessment
- Noise Impact Assessment
- Statement of Community Involvement
- Sustainability Statement
- Heritage and Townscape Visual Impact Assessment
- Transport Statement
- Framework Travel Plan
- Framework Construction Logistics Plan
- Stage 1 Road Safety Audit
- Covering letter response to TfL.
- Arboricultural Method Statement
- Tree Report
- Tree Schedule
- Financial Viability Assessment
- Pedestrian Wind Environment Statement
- Updated Fire Strategy
- Whole Life Carbon Assessment v.1 – July 2021
- Circular Economy Statement

## Appendix 2: Planning Policies and Guidance

The following lists set out the most relevant policies and guidance, although they are not exhaustive and the provisions of the whole Development Plan apply (in addition to further material considerations).

### London Plan 2021

- SD1 Opportunity areas
- SD6 Town centres and high streets
- SD7 Town centres: development principles and development plan documents
- SD10 Strategic and local regeneration
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agents of change
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix
- S1 Developing London's social infrastructure
- S4 Play and informal recreation
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- S11 Improving air quality
- S12 Minimising greenhouse gas emissions
- S13 Energy infrastructure
- S14 Managing heat risk
- S15 Water infrastructure

- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T6.3 Retail parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations

## **Croydon Local Plan (2018)**

### Strategic Policies

- Policy SP1: The Places of Croydon
- Policy SP2: Homes
- Policy SP3: Employment
- Policy SP4: Urban Design and Local Character
- Policy SP6: Environment and Climate Change
- Policy SP7: Green Grid
- Policy SP8: Transport and Communication

### Development Management Policies

- Policy DM1: Housing choice for sustainable communities
- Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres
- Policy DM8: Development in edge of centre and out of centre locations
- Policy DM10: Design and character
- Policy DM11: Shop front design and security
- Policy DM13: Refuse and recycling
- Policy DM14: Public Art
- Policy DM15: Tall and Large Buildings
- Policy DM16: Promoting Healthy Communities
- Policy DM17: Views and Landmarks
- Policy DM18: Heritage assets and conservation
- Policy DM23: Development and construction

- Policy DM24: Land contamination
- Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk
- Policy DM27: Protecting and enhancing our biodiversity
- Policy DM28: Trees
- Policy DM29: Promoting sustainable travel and reducing congestion
- Policy DM30: Car and cycle parking in new development
- Policy DM33: Telecommunications

#### Place-specific policies

- Policy DM42: Purley District Centre and its Environs

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

#### London

- Culture and Night-Time Economy (November 2017)
- Affordable Housing & Viability (August 2017)
- Crossrail Funding (March 2016)
- Housing (March 2016)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Town Centres (July 2014)
- Character and Context (June 2014)
- London Planning Statement (May 2014)
- Sustainable Design and Construction (April 2014)
- Play and Informal Recreation (September 2012)
- All London Green Grid (March 2012)
- London View Management Framework (March 2012)
- London's Foundations (March 2012)
- Planning for Equality and Diversity in London (October 2007)

#### Croydon

- Croydon Opportunity Area Planning Framework 2013 (adopted by the Mayor and Croydon)
- Designing for community safety SPD
- SPG 12: Landscape design
- Public Realm Design Guide 2019
- Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy– Review 2019