

PART 5: Planning Applications for Decision

Item 5.1

1 APPLICATION DETAILS

Ref: 24/00775/FUL
 Location: Purley Leisure Centre, 50 High Street, Purley, CR8 2AA
 Ward: Purley and Woodcote
 Description: Demolition of the existing buildings and erection of buildings of 5 to 12 storeys to provide a leisure centre (Use Class F2), an Integrated Retirement Community comprising a mix of Specialist Older Persons Housing and Care Accommodation for older people (Use Classes C2 and C3), car parking, landscaping, and associated works.
 Drawing Nos: See Appendices
 Applicant: Polaska Assets Limited
 Agent: Tom Roe of Avison Young
 Case Officer: Thomas Wilson

Proposed Housing and Care Mix (all age restricted)							
	Studio (1p)	1 bed (1p)	1 bed (2p)	2 bed (3p)	2 bed (4p)	3 Bed (5p)	TOTAL
Care suites	40	0	0	0	0	0	40
Extra care homes	0	17	33	0	7	0	57
Independent homes	0	13	58	3	48	1	123
Total	40	30	91	3	55	1	220

Existing and Proposed Vehicle Parking (PTAL: 5)			
	Existing	Proposed	Policy Standard
Public Car Park	412	50	N/A
Residential (IRC) Car Parking	N/A	24 (+ 4 blue badge)	Car-free / 3-10% blue badge
Total	412	78*	Car-free / 4-12 blue badge (IRC)

**The officer recommendation is to permit the IRC blue badge parking, with all other parking spaces made available to the public.*

Proposed Cycle Parking				
Land Use	Short Stay min	Short Stay proposed	Long Stay minimum	Long Stay Proposed
Residential	6	10	24	20 + 18 (shared with IRC)
IRC	22	16	15	18 (shared with residential)
Leisure Centre	28	36	4	8
Total	56	62	43	46

2 EXECUTIVE SUMMARY

- 2.1 Planning permission is sought for the redevelopment a prominent site within Purley Town Centre. Following the demolition of the existing leisure centre, a vacant supermarket, and a multi-storey car park, the proposal will deliver a modern leisure centre, an Integrated Retirement Community (IRC), and associated amenities, alongside a public square and improved pedestrian routes.
- 2.2 The development will provide a new leisure centre with a swimming pool, gym, fitness studio, café, and soft play area, overlooking a new public square.
- 2.3 The leisure centre is proposed to be provided to the Council at a subsidised cost, funded by an Integrated Retirement Community (IRC) which comprises 180 age-restricted homes (arranged as 57 extra care homes, and 123 for independent living) alongside 40 care suites. The IRC will include high-quality communal amenities, including a spa, fitness studios, and roof terraces.
- 2.4 The buildings would be arranged logically, maintaining and enhancing pedestrian connections through the site. A new public route will link Whytecliffe Road South and the High Street, alongside a public square designed to revitalise the town centre, which is a key objective of the Purley Regeneration Framework.
- 2.5 The proposal has attracted significant public interest, and substantial local opposition has been received to the reduction in public car parking spaces from local residents and visitors to the local mosque (currently being redeveloped). Following the demolition of the 412-space car park, a new 78-space car park will be provided, with 4 blue badge spaces reserved for new residents (increasing up to 12 depending on demand). The applicant has proposed the remaining spaces being provided as 24 private IRC parking spaces and 50 public parking spaces. However, to mitigate harm to the vitality of the town centre officers have recommended a condition securing all remaining spaces (initially 74) for public use.
- 2.6 The proposal will deliver substantial public benefits. The leisure centre and public square will support town centre regeneration, and provide 180 new homes, of which 10% would be affordable.
- 2.7 The proposal will also cause some harm. The scale and massing are substantial and will impact the setting of locally listed buildings and the Local Heritage Area. The design detailing and materials would reflect the local character alongside substantial new landscaping, urban greening, and open space, mitigating that harm.
- 2.8 Some neighbouring properties will experience significant losses of daylight, and some of the new homes will have limited aspect and daylight, partially mitigated by exceeding space standards, private outdoor amenity spaces, and the range of IRC facilities. The Local Plan generally resists additional care units, although again this is somewhat mitigated by their modern design and inclusion within an IRC.
- 2.9 The substantial public benefits are considered to outweigh the identified harms. The new leisure centre, public square, and improved public realm will deliver significant regeneration benefits and enhance the town centre's vitality. The housing provision, including affordable units, will make an important contribution to local needs. On balance, the proposal is considered acceptable, and approval is recommended subject to the planning conditions and Section 106 obligations set out in the report.

3 REASON FOR PLANNING COMMITTEE CONSIDERATION

3.1 This application is being reported to committee because:

- The ward councillor Cllr Brew made representations in accordance with the Committee Consideration Criteria and requested committee consideration
- Objections above the threshold in the Committee Consideration Criteria have been received.
- It is for the erection of a building or buildings with a gross floor space of 10,000 square metres or more or, where the floorspace is not given, the site area is 2 hectares or more.

4 RECOMMENDATION

4.1 That the Committee resolve to GRANT planning permission

4.2 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission subject to:

A. Any direction by the London Mayor pursuant to the Mayor of London Order (2008)

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

Planning Obligations

a) Affordable Housing and care provision

1. 10% intermediate affordable housing
2. Early and late-stage affordable housing review mechanism.
3. Marketing plan for all open market and affordable homes, requiring 6 months marketing to local residents prior to completion.
4. Requirement that all care users from outside of the borough can demonstrate funds for occupancy.

b) Transport

5. Highway works (through S.278 highways agreement) - to include (but not limited to):
 - a. Re-surfacing of footpaths adjacent to the site and re-paving of damaged highway
 - b. At least 9 new trees on High Street and Whytecliffe Road South
 - c. Removal of redundant dropped kerbs
 - d. Provision of new dropped kerbs and vehicle access
 - e. Revision of existing on-street parking arrangement and amendments of associated traffic orders
 - f. Provision of visitor Sheffield stands on High Street
 - g. Whytecliffe Road South partially widened, raised surface extended, taxi bay repositioned, relocated parking bays
 - h. Relocation/Installation of street lighting to suit new site layout
 - i. Remedying any damage to the carriageway resulting from construction activity

- j. Stopping up existing public highway and adoption of new paths/public highway, subject to technical approval.
- 6. Potential to enter into S.38 agreement for adoption by the Council of reconfigured footway (with maintenance contribution secured).
- 7. Review of on-street car parking on High Street and Whytecliffe Road South and payment of necessary s278 works (to off-set loss of 2 bays on High Street and 1 on Whytecliffe Road South).
- 8. Restriction on residential parking permits in CPZ and town centre car parks.
- 9. Provision of car club (subject to review of local need 6 months prior to completion) and Residential occupiers' membership of car club for three years where requested by resident.
- 10. Leisure centre travel plan (including minibus provision).
- 11. IRC travel plan.
- 12. Car parking provision, management and monitoring.
- 13. Sustainable travel contribution (£270,000).

c) Environmental

- 14. Carbon offset financial contribution (estimated £375,751).
- 15. Be Seen monitoring clauses.
- 16. TV signal mitigation.

d) Design

- 17. Retention of scheme architects.
- 18. Placemaking and Cultural Strategy including public art clauses and Safety review including Women's Safety Audit and implementing any suggested mitigation for the public footpath between High Street and Whytecliffe Road.

e) Public realm

- 19. Permissive public realm – to secure public access to the public realm.
- 20. Public realm delivery.
- 21. Public square use strategy.
- 22. Maintenance and management of public spaces, landscaping and public lifts.

f) Employment and Training

- 23. Local Employment and Training Strategy (LETS).
- 24. LETS contribution – construction phase (£430,000).
- 25. LETS contribution – operation phase (£109,000).

e) Other

- 26. Contribution of £228,000 towards investment at GP practices in the Selsdon Purley & Coulsdon Health Primary Care Network.
- 27. Development phasing plan to ensure delivery of the leisure centre before occupation of the IRC.
- 28. BNG monitoring.
- 29. Monitoring fees.
- 30. Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration

- 4.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.
- 4.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

Standard (Compliance)

1. Commencement time limit of 3 years
2. Carried out in accordance with the approved drawings

Pre-commencement including demolition

3. Demolition and construction logistics plan inc. Dust Management Plan
4. Construction Environmental Management Plan including Precautionary Method of Working, Re-survey of site, appointment of ecological clerk of works and in accordance with recommendations in ecological appraisal
5. Phasing plan
6. Site levels
7. Tree protection (demolition, and construction phase)
8. Details of hoardings

Pre-commencement (except for demolition)

9. Updated drainage strategy.
10. Land contamination – site investigation, remediation and validation.

Prior to above ground floor slab level

11. Samples and details (as appropriate) of materials including window frames, balustrades, and full sized material sample panels constructed on-site.
12. Detailed design drawings
13. Detailed design of the leisure centre frontage including restrictions on screening or obscured glazing to ensure passive surveillance.
14. Secure landscaping proposals including materials, planting, furniture, green roofs and walls, wayfinding, drinking fountains, boundary treatments, external walls to public route (facing footpath etc) biodiversity measures, cycle parking, external equipment (including power and water supply) and anti-terrorism measures. Must provide maintenance for these, plus meet minimum Urban Greening Factor of 0.4 and have tree contingency.
15. Wind mitigation to balconies and terraces
16. Biodiversity enhancement strategy
17. Secure by Design details and certification (pre-occupation)
18. Updated noise assessment in relation to Purley Depot and associated acoustic design statement, ventilation strategy and overheating strategy

Pre-occupation/installation

19. Delivery and servicing plan
20. External lighting plan
21. External plant and renewable technology (noise and appearance)
22. Privacy screens and obscured glazing

23. Operation management plan including stipulating access to all communal areas (rooms and outside space) for all residents within both blocks
24. Building maintenance strategy including cleaning
25. Digital connectivity
26. Foul water infrastructure
27. SuDS maintenance strategy
28. Details of cycle parking
29. Updated Refuse strategy
30. Provision of all on-site parking for public use, except for blue badge provision for the independent living homes.

Post-occupation

31. Report on the development's actual whole life cycle emissions
32. Post-construction monitoring report for circular economy
33. Leisure centre management plan including noise and vibration mitigation for those living above.
34. Demonstrate BREEAM Excellent compliance
35. Details of energy savings
36. Mini-bus parking

Compliance / Additional requirements

37. No piling unless method statement submitted
38. Electric vehicles charging point for all disabled parking spaces, with 20% active and 80% passive provision for car park
39. Secure air quality assessment and air quality neutral assessment
40. Secure whole life cycle emissions
41. Secure circular economy statement
42. Secure fire statement and evacuation lift
43. At least 10% of homes to meet M4 (3) accessibility standard with the remainder achieving M4(2).
44. NRMM air quality
45. Water use target
46. No screening to the leisure centre frontage
47. No external equipment other than rainwater pipes on elevations
48. Removal of permitted development rights for telephone masts
49. Age restriction (55+).
50. Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Biodiversity Net Gain

1. BNG standard condition

Informatives

1. Community Infrastructure Levy
2. Subject to legal agreement
3. Thames Water Advice
4. Pollution and Noise from Demolition and Construction Sites Guidance
5. Waste Informative
6. Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration.

- 4.5 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest and has paid special attention to the desirability of preserving or enhancing the character and appearance of the Webb Estate and Upper Woodcote Village Conservation Area as required by Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.6 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.
- 4.7 That, if within 6 months of the planning committee meeting date, the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.
- 4.8 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 PROPOSAL AND LOCATION DETAILS

Proposal

- 5.1 Planning permission is sought for the demolition of the existing leisure centre (circa 2,518sq.m), vacant supermarket and multi-storey car park, and the erection of four linked blocks (A-D) of 5-12-storeys to provide:
- Leisure centre (2,597sq.m comprising 2,186sq.m main leisure centre on ground floor and 411sq.m of plant space on basement and mezzanine levels) including a 25m long swimming pool, training pool, fitness studio, 80-100 piece gym, café and soft play.
 - Integrated Retirement Community (IRC) totalling 220 units comprising a 40-room care facility and 180 (age-restricted) homes of which 57 would be extra care homes and 123 independent living homes. 10% of homes would be affordable (intermediate) housing.
 - Associated amenities including restaurant, bar/bistro, village shop, spa, aquafit pool, movement studio, fitness studio, games room, multi-purpose studio, lounges and meeting rooms
 - 78 space car park
- 5.2 The four blocks would all be linked and span between Whytecliffe Road South and the High Street. The existing public footpath along the site boundary would be retained and improved, and a new public route would link the two roads alongside a public square fronting High Street.
- 5.3 Block A would front High Street and would be 5-storeys tall. It would contain a part of the leisure centre on the ground floor and 19 independent living units above. A three-storey link would join it to Block B.
- 5.4 Block B would be a 10-storey building that includes a 2-storey podium with mezzanine level that contains a leisure centre and car park over the lower level and mezzanine, and restaurant, bistro, spa and other 'later living' amenities on the upper level. Above podium level would contain 40 care units and 57 extra care units. The building would adjoin Blocks C and D, which would be 9-storeys and

Block D 12-storeys respectively, fronting Whytecliffe Road South. They would sit above the podium and contain 104 independent living units on the upper floors.

- 5.5 The roofs would be used as communal terraces and to house associated plant.
- 5.6 There would be a rear courtyard serving as a secondary access to the development.



Figure 1: Layout



Figure 2: CGI

Amendments

- 5.7 During the course of the application amendments to the scheme were secured as a result of officer feedback. A full re-consultation exercise took place from 9th January 2025.
- 5.8 The amendments broadly comprise:
- Unit mix slightly changed – 3 x 1-bedroom units enlarged to 2 x 2-bedroom units and 1 x 3-bedroom unit (within Block A)
 - Affordable housing provision of 10%
 - Ground floor of Block A and leisure centre reconfigured. Commercial unit omitted and Leisure centre extended below Block A, increasing size by approx. 290sq.m.
 - Block A re-designed with chamfers added to both corners on the high street, height increased to 5 storeys adjacent to public square, darker brick used, faced detailing refined and upper floors simplified.
 - New placemaking and public realm design and strategy.

Site and Surroundings

- 5.9 The site is approximately 0.72ha. It is located within Purley District Centre, spanning between the High Street and Whytecliffe Road South. The site is made up of a number of different uses notably the now closed Purley Leisure Centre, Purley Multi-Storey Car Park providing 414 car parking spaces and a former supermarket.
- 5.10 The site currently comprises one large sprawling building of brick and concrete construction that ranges in height from a single storey on the north eastern flank, adjacent to the 2-storey residential terrace on the south side of Woburn Avenue, to approximately 5-storeys in the middle of the site.
- 5.11 The site is unusually shaped owing to the existing two buildings on the High Street which do not fall within the red line boundary, which appear to be in mixed use with residential above ground floor commercial uses.
- 5.12 There is a significant change in levels across the site of approximately 6m from Whytecliffe Road South down to the High Street.
- 5.13 The surrounding streets are a mix of commercial and residential buildings of 2-6 storeys.
- 5.14 A planning application (21/01753/FUL) for a 9-storey development on the site opposite at nos. 26-52 Whytecliffe Road South was resolved to grant by the planning committee on 4th April 2024.
- 5.15 A 5-storey development (19/02109/FUL) that includes Purley Mosque is currently under construction at no. 63 Whytecliffe Road South.



Figure 3: Aerial view of the site and surroundings

Planning Designations and Constraints

5.16 The site is subject to the following formal planning constraints and designations:

- The site is within Purley District Centre
- The site is not within a conservation area.
- The existing buildings are not listed.
- The adjacent and opposite buildings on High Street fall within a Local Heritage Area (LHA), with locally listed buildings within the vicinity and the Grade II listed Purley United Reformed Church, north of the site.
- The site has a Public Transport Accessibility Level (PTAL) of 5.
- Largely within Flood Zone 1 (low), partially within Zones 2 and 3
- Medium risk from surface water flooding (with areas of high risk adjacent to the site).
- Potential for groundwater flooding to occur at surface
- Critical drainage area
- The site is allocated in the Local Plan (site 30) for “a mixed-use redevelopment incorporating public car park, new leisure facilities, including a swimming pool, and other community facilities, healthcare facility, creative and cultural industries enterprise centre, retail or residential accommodation”
- Place specific policy, DM42 (Purley) requires buildings to “Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys” (which has already been consented at Purley Baptist Church).

Planning History

- 5.17 There is no planning history on the site itself of relevance. However, the following recent applications relating to surrounding sites are considered to be of relevance:

26-52 Whytecliffe Road South, Purley, CR8 2AW

- 5.18 21/01753/FUL - Demolition of the existing and erection of a part 6/part 8/part 9 storey building and separate part 4/part 5 storey building to provide 247 residential units. Pending consideration.

63 Whytecliffe Road South Purley CR8 2AZ

- 5.19 19/02109/FUL - Demolition of existing mosque and erection of mixed-use mosque development comprising public worship spaces, function areas and one floor of residential use (3 x studio flats) with associated landscaping. Approved and implemented.

Pre-Application Advice

- 5.20 Several meetings were held between the developer and planning officers. These are highlighted within the application submission, and the Council's pre-application advice was made public. The pre-application advice generally supported the principle of the mixed-use development, focussed on the delivery of key public benefits including the leisure centre and public square. Officers also advised the developer of the need to minimise harm caused to the townscape and supported the distribution of massing across the site whilst expressing a preference for reduced height. Officers also advised that the accommodation should be of high quality, and that harm to surrounding occupiers should be minimised. The pre-application advice has been published online for transparency.

Pre-Application Planning Committee Presentation

- 5.21 The proposal was presented to the committee on 3rd August 2023. A summary of the main points is outlined below:
- Members queried parking demand in the town centre and whether there was scope to increase parking provision. They suggested that further research on parking need is undertaken and that parking demand from the leisure centre must be considered.
 - Suggested that cycle parking provision and enhancements could be improved.
 - Queried whether homes (in particular affordable homes) for people under 50 could be included.
 - Impact of development on local amenities and services must be considered.
 - Queried the demand for such a development and encouraged the involvement with adult social services. Noting already a lot of care homes in the area.
 - Suggested family units are included to create a more diverse community for the residents and bigger units for intergenerational use.
 - Queried the number of dual aspect units.

- Queried the need for daylight to the pool and maintenance requirements.
- Consider school children drop-offs and communal area for kids within the facility, and also external children's play space.
- Stated that 12-storeys may be too high within Purley, and the height may be better suited within the middle of the site. Highlighted the needs to have high architectural quality.
- Function of public square including overlooking, active frontages, legibility, accessibility and lighting. Potential inclusion of water feature.
- Noted the carbon impact of redeveloping the site and explained that it must ensure that the scheme is low energy, where appropriate using natural ventilation with efficient heating of the swimming pool.

5.22 Design Review Panel

5.23 The proposal was presented to the Design Review Panel (DRP) on two occasions.

5.24 The first took place on 18th May 2023. The panel strongly recommended the applicant to:

- Consider the whole façade as important.
- Ensure the architectural approach is of high quality to justify for greater massing and height and to make it into an attractive place of joy with sufficient daylight and direct sunlight.
- Consider breaking up the mass to avoid the megastructure nature of the current development.
- Confirm through a high-level viability study that the refurbishment of the existing leisure centre is not possible.
- Refine the landscape strategy to create a strong story that also contributes to the public realm in the surrounding streets and in particular high street.
- Consider an affordable element of accommodation.
- Further understand the local needs in terms of what the commercial units may be and the amount of parking spaces.

5.25 The second DRP took place on 7th December 2023. The summary from the panel was:

- Acknowledge the site is complex, but there are opportunities for improvement including the public square and community offer, which should be the key driver.
- Concerns regarding the colonnades of Block D and the entrance route from Whytecliffe Road South. Emphasised that the ability to create a positive public space where everybody feels welcomed is more important than fitting in more units.
- Current proposal seems like overdevelopment in the way the massing is presented and any way it could be pulled back/reduced would help.
- Applicant should further refine the architectural and material detailing with regard to how the buildings touch the sky and the ground, addresses anti-social behaviour and safety, and how the buildings are broken down.
- Consider how the elevation from Woburn Avenue is seen and felt, how the different characters of each of the blocks could be articulated, and how the entrance corner of Block D could be celebrated and seen more as an arrival point.

- To better inform the character of the public realm, provide clarity in the language of the different blocks and celebrate the civic quality of the leisure centre more.
- Recommend that a landscape narrative be told through the public realm and takes into account the practicalities of greening.

6 CONSULTATION RESPONSES

- 6.1 The application was subject to a statutory consultation process. The application was publicised from 22/03/2024 to 25/04/2024. Following receipt of amended plans and documents, a second consultation period took place from 09/01/2025 to 06/02/2025.

Statutory and Non-Statutory Consultees

- 6.2 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.
- 6.3 The following were consulted regarding the application:

Greater London Authority (GLA)

- 6.4 A summary of the Stage one response and follow up correspondence is set out below:

Land Use Principles

- The proposal for the comprehensive redevelopment of the site for a mixed-use development, re-providing the existing leisure centre meets with the London Plan objectives of a Brownfield site and District Centre location.
- The extent of public car parking should be reduced to car-free and Specialist Older Persons Housing uses.

Affordable Housing

- The introduction of affordable housing (previously a nil offer) is welcomed. There are a number of elements in the viability assessment in which GLA officers disagree with the applicant's viability consultant. However, overall, it is acknowledged that, with the costs of the leisure centre significantly affect the scheme's viability, the proposed development is likely to be providing the maximum viable amount of affordable housing at the application stage. The proposed development would be subject to early and late-stage review.

Urban Design:

- Development layout, internal quality, architecture, materials do not raise strategic concern, nor does the broad massing principles and height distribution across the site.
- Fire safety and inclusive access dwellings should be secured.

Heritage:

- No harm is identified to heritage assets.

Transport:

- Development should be car-free development and drop-off spaces should be internal to the development.
- The Council is encouraged to secure further commitments to reducing the extent of car parking by condition/S106.
- Some concerns remain regarding the safety of the remaining existing public footpath and arrangement and layout of cycle parking these could be resolved via conditions and/or S106 obligations

Sustainable development and environmental matters:

- Energy strategy, circular economy, whole life-cycle carbon and air quality are acceptable subject to conditions and S106 obligations.

Adult Social Care & Health (ASCH)

- 6.5 Croydon currently has the 49th most residential care per 1000 people over 65, in the country (out of 329) and is ranked 1st in London. ASCH are looking to reduce this number.
- 6.6 Assisted living/Extra Care, can help with this reduction. However, more care suites are not required, although more social (affordable) extra care is required.
- 6.7 Removing the care suite and repurposing them to extra care units would be beneficial.

Environment Agency

- 6.8 No objection subject to contamination conditions (remediation strategy, verification report and contingency) and piling condition.

Carter Jonas (Independent Viability Consultant):

- 6.9 The proposed development would generate a deficit of approximately £5m and it would not be viable to provide more affordable housing.
- 6.10 Recommend the Council includes both an early and late-stage review mechanism within the Section 106 Agreement.

Counter Terrorism Security Advisor

- 6.11 Whilst there is no intelligence to suggest that the new building will be a specific target, it is recommended that the site undertake mitigation against the most common and current attack methodologies used by terrorists.

Designing out Crime Officer

- 6.12 No objection subject to secure by design conditions.

Historic England – GLAAS (archaeology)

- 6.13 No objection and no condition required.

Housing LIN (The Housing Learning and Improvement Network)

- 6.14 The balance of the type and number of units for each accommodation type are appropriate for this type of specialist older person's accommodation. The tenures are consistent with current specialist accommodation types and standards. The mix of housing and accommodation types proposed are reasonable and appropriate.
- 6.15 The percentage of wheelchair units is appropriate. The communal facilities for residents of the IRC are typical in relation to current good practice. The size of the units is supported, and the development is consistent with the HAPPI design principles.
- 6.16 The roof level external amenity space for the intended mix of older residents is consistent with current good practice. The external courtyard has limited amenity value for residents, although it does provide an alternative to the roof garden.
- 6.17 The needs assessment for care home beds to 2033 is based on a simple calculation using LaingBuisson's 'Age Standardised Demand'. There is no evidence provided as to why LaingBuisson's ASD provides a reliable and robust method for assessing need for care home beds. The reliability and validity of the estimates of future need should be reviewed.

HSE (Gateway One)

- 6.18 The substantive response is 'content' in relation to fire safety matters affecting land use planning. It will be for the applicant to demonstrate that appropriate means of escape are provided at subsequent regulatory stages.

Job Brokerage Officer

- 6.19 No objection subject to submission of a local employment and training strategy, contributions to cover employment and training of £430,000 at construction stage and circa £109,000 contribution at end use phase, all to be secured within a legal agreement.

Lead Local Flood Authority (LLFA)

- 6.20 The submitted strategy and overall approach meet most of the LLFA requirements. However, the information submitted is not adequate to fully demonstrate the compliance. Clarifications and additional information are still required in some aspects of the strategy before this can be approved. An updated strategy should be secured by condition.

Network Rail

- 6.21 Potential for noise/vibration impacts to future occupiers of the site. Appropriate building materials should be used to reduce any potential noise disturbance from the railway.

NHS London Healthy Urban Development Unit

- 6.22 No objection subject to a contribution of £228,000 towards the expansion of local GP surgeries, to be secured within a legal agreement.

Place Services (biodiversity/ecology)

- 6.23 No objection subject to conditions requiring all mitigation measures to be carried out in accordance with the submitted report, submission of a Construction Environmental Management Plan for Biodiversity and submission of a Biodiversity Enhancement Strategy. Biodiversity Net Gain has been demonstrated and should be secured.

Pollution Control Officer (air quality, noise and light)

- 6.24 No objection subject to conditions requiring submission of updated Construction and Environmental Management Plan, and plan for managing noise from fitness studio/gymnasium/leisure centre. Conditions requiring compliance with air quality assessment and noise assessment.

Principal Building Control Surveyor (fire safety)

- 6.25 No objection subject to a condition requiring compliance with Fire Statement.

Sport England

- 6.26 No objection, although note lack of buggy store, limited office space and no First Aid room. Fully supports the need to secure the replacement for this important community facility, which has now been closed for a number of years. However, suggest the Council seek further advice on these points, particularly where they relate to health and safety.

Sports & Leisure Manager

- 6.27 Overall satisfied with the design of the leisure centre. Suggest further consideration at detailed design stage to consider incorporating a dedicated First Aid Room, refining the provision for offices, staff rooms, and cleaning stores, and carefully reviewing the soft play inclusion to ensure it aligns with operational needs. GLL (the current operator of Council leisure centres) should check and agree the final calculations for the changing facility areas. The comments from Sport England and Swim England should be read alongside these comments.

STM Environmental (contamination)

- 6.28 No objection subject to a condition requiring site investigation, remediation and verification.

Street Tree Officer

- 6.29 Objects to loss of street trees but notes mitigating planting.

Sustainable Development & Energy Team

- 6.30 Notes that achieving the target “Be Lean” reduction using the new Part L 2021 (with 2023 amendments) is difficult. This is because the ‘baseline’ assumption is now use of heat pumps (rather than gas boilers) which will have a low carbon factor due to decarbonisation of the grid. Note proposed communal heat pump system which would be compatible with any future heat network in that area.
- 6.31 The Be Lean has been improved from 2.3% to 5.5% (it’s still far from the 15% GLA target) and the average space heat demand has reduced from around 13 kWh/m² to 8.86. Given the leisure centre is the dominant share of the non-domestic space, this may well be the limiting factor of what more can be achieved.
- 6.32 There is a significant Carbon Offset contribution which will need to be included within the S106 agreement.
- 6.33 The standard Carbon Offset clauses should be included with payment trigger points of 50% on commencement on site, with the remaining 50% on practical completion.
- 6.34 There are no DHNs in that area – and no planned networks either.

Thames Water

- 6.35 No objections subject to foul water upgrades and piling conditions, and informative.

Transport for London (TfL)

Healthy Streets

- Route through the site is a welcomed addition and supports the Healthy Streets approach
- Improvements to the existing public right of way to improve personal safety/security must be secured. Should undertake a Women’s Safety Audit.
- Drop-off should be contained within the northern courtyard serving the IRC
- No major concerns with slight relocation of the taxi rank and reduction by 2m.
- The existing vehicle dominance on Whytecliffe Road South is contrary to the Healthy Streets approach

Cycle parking

- All cycle parking should be in line with the London Cycling Design Standards, including a mix of stands and at least 5% able to accommodate larger and adapted cycles.

Car parking

- The significant reduction in car parking from the existing multi-storey car parking is acknowledged, although the location requires a car-free development.

Therefore, all car parking should be removed except for disabled persons parking

- The parking capacity analysis suggests that there would be spare capacity, therefore supporting a further reduction in overall town centre parking provision.
- The applicant should explore opportunities to repurpose car parking in the future to sustainable travel.

Trip Generation and impact

- The net trip generation is considered to reflect a worst case. At a strategic level the additional demand is not expected to have a significant impact, although a further shift away from car travel may need to be supported by enhancements for walking, cycling or public transport.
- Justification for additional car parking based on the expected vehicle movements, is not supported. The strategic mode shift targets seek to achieve 80% of all trips by walking, cycling or public transport by 2041. As such, encourage the Council to consider further reductions to car parking in Purley.

Deliveries and construction

- Additional servicing could take place from the taxi ranks, although preference would be for all vehicles to use on-site provision wherever possible. A detailed Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition. Not supportive of using bus stop for mini-bus drop-off.

Waste and Recycling

6.36 No objections.

LOCAL REPRESENTATION

6.37 A total of 330 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to the first notification and publicity of the application were as follows:

No of individual responses: 1255 Objecting: 1101 Supporting: 141

6.38 A Petition signed by 26 in support of the application was received.

Local Representations

- 6.39 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Objection	Officer comment
Character and design	
Too tall and crowds the sky-line. Should be no higher than existing Whytecliffe Road South buildings	Concerns about the design impacts are assessed within the Height, Scale and Massing, and Impacts on Local Character and Townscape and Character and Appearance sections of this report.
Out of keeping / Imposing, and Out of character with the area	
Poor design – lack of visuals	
Overdevelopment / Purley is already over-developed	
Concerns about the wider impacts, including the public realm, local heritage and wider views are considered in the Layout, public realm and landscaping section, the Heritage Impacts section, and the Tall Building Policies section.	
Neighbouring amenity	
Overshadowing neighbouring land/property	Concerns in this respect are covered in the Impact on neighbouring residential amenity section of the report.
Overlooking / loss of privacy to neighbouring land/property	
Loss of daylight and sunlight	
Oppressive/intrusive	
Increased noise and air pollution	
Noise and disturbance during construction	
Noise from use of service yard at unsocial hours	
Transport and Highways impacts	
Loss of car parking and insufficient replacement provision. Increased parking demand and traffic on local streets.	Concerns in this respect are covered in the Access, parking and highway impacts section of the report.
Potential loss of blue space parking	
Parking survey of the area ignores long-stay requirements	
Application is understating usage of the car park and overstating local parking capacity. Survey demonstrates that there is insufficient capacity on some days.	
Lack of parking will impact local businesses whose staff drive to work, visitors to the shops, hospitals, leisure facilities, mosque, community engagement with local activities (Purley farmers market, fun fair and other events)	
Existing car park supports commuting into London. Commuters must then use other stations or drive to their destination.	

Lack of car parking would be detrimental to the high street.	
Tesco parking would be overburdened or inadequate as it is short stay only.	
Increased traffic and congestion (during and post-construction)	
Too much car parking proposed, should be more cycle parking	
Car parking needed for visitors to the proposed mosque notably over festive periods and on Fridays.	
Existing car park used by disabled and elderly	
Trees and ecology	
Needs more green space	Concerns in this respect are covered in the Trees, landscaping and biodiversity section of the report.
Environment and Social	
Excessive carbon footprint of tall building	Concerns in this respect are covered in the Energy efficiency and sustainability section of the report.
Impact on climate change	
Wind tunnel between buildings	Concerns in this respect are covered in the Microclimate section of the report.
Impact on flooding	Concerns in this respect are covered in the Flood risk and SuDS section of the report.
Additional pressure on limited wastewater capacity	
Create antisocial behaviour between buildings	Secure by design accreditation to be secured by condition
Impact on local services: doctors, dentists, libraries and public transport	Concerns in this respect are covered in the Access, parking and highway impacts and Health sections of the report. The recommended s.106 agreement includes a financial contribution to increase local GP capacity.
Additional strain on health facilities from older residents	
Leisure Centre	
Leisure Centre: Better to have one changing village for all users, require group changing rooms (for schools), sauna and a steam room should be included	Extensive negotiations have taken place with Sport England and the Council's leisure centre operator GLL to optimise the layout.
Leisure centre is no bigger than the original	The leisure centre is slightly bigger and will be up to modern standards.
Pool should be open whilst remaining parts of the development are built	The intention is for the construction to be phased, with the leisure centre, car park and Block A built first.
Swimming pool is basic. Water Polo swimming and other potential activities should be considered, as well as features such as slides and waves.	The constraints of the site and finances limit the scale of the proposed facility; the proposed leisure centre would be larger than the existing and would include 2 swimming pools.
Olympic dimensions should be considered or the full potential will be lost and regretted.	

Re-open existing leisure centre	A decision must be made on the planning application, any alternative options are separate to this application.
Housing	
Should be affordable. No social or affordable rent housing	Affordable housing now provided.
Purley already has a number of approved high-rise flats	Flats provide an important source of homes. This site is a suitable location for flats, and the provision of flats is needed in order to optimise the potential of site.
Overprovision of retirement flats already within Purley	Concerns regarding need and mix are covered in the Local Need for Older Persons Housing section of the report.
The housing should be for everyone. Need better housing mix.	
Potentially a large number of the units would remain empty. Retirees likely to prefer quieter locations. Questionable whether down-sizers will be attracted to a development in this location	The development offers a range of amenities and is located within a town centre with good transport links and facilities. This proposal offers an alternative to the out of centre provision.
Procedural matters	
Inadequate public consultation	The applicant has undertaken extensive public consultation as detailed in their Statement of Community Involvement. The Council has publicised the application in accordance with statutory requirements.
General Concerns	
Are there sufficient carers in Purley given the number of older living developments within the area	The location supports people commuting to the site for work.
The library should be moved to this site	There is insufficient space to accommodate additional facilities, and they are not a planning policy requirement for this site.
Other activities should be considered including a cinema, bowling alley	
Must ensure that the plumbing and boiler for the swimming pool is easily accessible	This is within the basement and accessible.
Spectator seats should be over the main pool rather than the training pool – better for school galas	The viewing area allows for parents to watch their kids whilst they are having lessons in the training pool.
Pool facilities should include easy access	Concerns in this respect are covered in the Leisure Centre and Equalities sections of the report.
Low level of parking spaces should be supported by improved public transport	There would be extensive cycle parking across the site. TfL have reviewed the proposals and not requested a contribution towards improving public transport.
Need to compulsorily purchase the funeral parlour and cafe buildings on Purley High Street to create a comprehensive development of the site	This was suggested by officers at pre-application stage, but is not a policy requirement and the site has been designed to allow adjacent redevelopment in future.

Potential to prejudice the existing and future operation of the Purley Rail Depot by introducing new sensitive receptors	Concerns in this respect are covered in the Quality of residential accommodation section of the report.
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Support
Rejuvenate/regenerate Purley town centre/high street
Attract people to the town centre
Swimming pool for local community – presently a lack of facilities in the area
Will increase footfall, supports local business, boost local economy
Provision of public square
Retirement accommodation will support an ageing population
Commercial space will add to local businesses
Will provide full time and part time jobs throughout the construction process and once the site is operational
Fit well with existing development
The existing car park is a dirty, smelly and intimidating environment
Supports improved health and fitness, and mental health
Supports competition, child and youth development

Additional matters
Ownership and financial background of company is unclear (transparency, financial resourcing and taxes)
Must minimise risks associated with financing / liability remoteness in a developer failure / bankruptcy scenario
Loss of property value
There should be free parking facilities during all stages of the development.

Re-Consultation

- 6.40 Following the receipt of amendments, a further consultation exercise was carried out in January 2025. The number of representations and additional comments for the amended consultation period are set out below.

No of individual responses: 1014 Objecting: 606 Supporting: 403

The number of representations received in total across both consultation exercises is as follows:

No of individual responses: 2269 Objecting: 1707 Supporting: 544

- 6.41 The following additional issues were raised in representations that are material to the determination of the application (note only new material matters from those previously raised are covered below), and they are addressed in substance in the next section of this report:

Objection	Officer comment
Character, design, layout	
Placemaking strategy is insufficient	Further details of the placemaking strategy and maintenance of the public spaces will be secured within the legal agreement.
Insufficient clarity on how the public square will be managed and maintained.	
Missed opportunity to be distinctive and enhance Purley as a 'place'	

Design a missed opportunity to create something truly distinctive and forward-looking	Concerns in this respect are covered in the Character and appearance section of the report.
Insufficient external amenity	Concerns in this respect are covered in the Amenity Space section of the report.
Leisure Centre	
Imbalance between male and female changing and showering facilities Mixed dry changing is unsatisfactory	The layout has been reviewed by Sport England, Swim England and GLL (Council's leisure centre operator) who are generally satisfied with the provision. The planning application is for the use of the building as a leisure centre; the detailed layout will be considered further at detailed design stage.
Pool area is small and underground with no natural light	The main pool is a standard 25m length. It will receive some natural light from high-level windows.
Transport and Highways impacts	
Does not detail where visitors, tradesmen, staff will park.	There would be many parking opportunities within the town centre including within the proposed car park.
Using public transport as alternative to driving is not safe for some.	This a wider issue and beyond the scope of the application.
Over-reliance on Tesco Car Park	Concerns in this respect are covered in the Access, parking and highway impacts section of the report.
Economical, Environment and Social	
Removal of commercial units from Building A limits opportunities for local businesses and reduces the vibrancy of the High Street. Should be more restaurants and café around the square	There are several vacant units within Purley and also many food outlets. The proposal includes a café fronting the square, and there is a café adjacent to the site on High Street.
Location of bin store on Woburn Ave will lead to traffic, pollution, noise, disturbance and smells.	This store is primarily to serve the 19 units in Block A. The associated impacts of a store of this size would not be unduly harmful.
Leisure centre could be a potential financial drain	The leisure centre has been enlarged partly to ensure it is as financially viable as possible.
Housing	
Low level of affordable housing and does not address local demand.	It is the maximum reasonable amount.
Pepper-potted distribution of AH: concerns about long-term management and accessibility	The rent levels will be inclusive of service charges.
Already many unoccupied retirement properties in the Borough	The applicant considers there is a market for this product, it would be a different housing community to other retirement properties, and there is a evidenced housing shortage.

Support
Provision of outside public toilets
Security to flats
Support
Improved design, more in-keeping with the area.
Removal of the existing ugly car park is good
Will free up larger dwellings for families.
Soft play a good, needed addition
A lot of the parking in the MSCP are commuters who do not spend money or use the High Street

Additional Matters
Significant numbers of objections received.
The development opposite should not go ahead, as not appropriate to have tall buildings on both sides of the road
Lack of investment from the Council in the south of the borough
Council should receive a share of the profit.
Applicant has no track record of building such a development.

Residents Associations

6.42 The following local groups/societies made representations:

6.43 Riddlesdown RA, Hartley & District RA, East Coulsdon RA, Selsdon RA, Croham Valley RA, Old Coulsdon RA and Coulsdon West RA object on the following grounds:

- Very supportive of rebuilding a new leisure centre, although at expense of viability and success of the town centre, primarily in relation to loss of public parking.
- The proposed scheme must take into account the development at Purley Station Car Park will also involve the loss of some public parking for commuters.
- Site used as a car park since at least the 1950's. Used by businesses for staff parking including previously for hospital staff, and patients going to the hospital.
- Our own monitoring of the car park shows it is more that 50% full at certain times - so over 200 vehicles.
- Rail station does not serve passengers who live away from the station in poor PTAL areas. Even bus routes which go to Purley town centre, do not cover those areas.
- Difficulty negotiating local hills other forms of transport, like cycling or walking, especially with shopping and/or young children in buggies, the elderly etc.
- Town centre trade will suffer financially due to lack of car parking. Pressure on other car parks and on-street bays. Residents will be attracted to the proposed development and will drive from other areas of the Borough (and from outside).
- Unclear what the other 28 parking spaces will be used for. No details of parking for emergency doctors, care workers and other medical staff. There are no visitor or delivery parking bays for the flats.
- The availability of Council public car parking within the Town Centre will be reduced from 547 spaces to 173 spaces. The Council should not rely on other private car parks to provide the shortfall in public parking.

- The parking numbers supplied by the applicant about the availability of other public parking are overstated.
- Largest private car park is Tesco with site designated for redevelopment in the Local Plan, which would lead to parking being severely reduced. Tesco may try to curtail the free public parking (up to 3 hours) or could close.
- Purley Mosque site in Whytecliffe Rd South is currently being constructed, has no parking and has a significant parking demand, that should be taken into account.
- Significant reduction compared to site opposite where parking would be reduced from 165 to 125 parking spaces, plus 17 motorcycles and 2 car club spaces.
- Lack of parking when public car park unavailable until the completion, plus if Rail station car park constructed at same time further 175 parking spaces removed.
- Fire risk from car park below residential units and charging of batteries for e-bikes and mobility scooters. Parking should be separate from the blocks with flats.
- Query the demand for these type of flats for the elderly.
- Pressure on both the foul and surface water sewer systems, water supply and increase flood risk from this and other planned developments.
- Wind and daylight report should take into account the impacts upon the development opposite. Wind tunnel effects
- Overlooking between habitable rooms of blocks either side of Whytecliffe Road South.
- Lack of affordable housing.
- Relocation of existing mobile masts.
- Height of the four blocks between 9 and 12 storeys contravenes policy.
- Excess cycle parking for elderly residents.
- Provision should be made for a bus stop in the High Street.

Additional comments following re-consultation:

- Difficult to manage or control the 'flexible' IRC parking spaces
- CLP out-of-date.
- Unsure car park will be open at same time as leisure centre
- Impact of loss of car parking on future Purley Mosque
- Lack of parking will harm the town centre
- Viability of the units
- Strain on NHS and GPs
- Impact to daylight between app ref. 21/01753/FUL and proposal

6.44 Purley and Woodcote RA supports on the following grounds:

- Closure of pool removed a significant community resource to the detriment of residents and reduced footfall in Town Centre harming local businesses. Led to an increased number of empty retail units and the erosion of historic appearance of the town centre, with residents then seeking better retail experiences further afield.
- Presently a significant parking resource for the area. However, car park feels unsafe and has experienced crime. Presently the thoroughfare between the train station and the High Street is via a dimly lit and narrow footpath.

- The pool would require an investment of circa £3.4m to bring it back into operation. Opportunities for a complete redevelopment could provide represent better value.
- New leisure facilities will be a valuable amenity resource. Improved route between train station and High Street, culminating in a public square (can host community events and gatherings). Catalyst for investment and regeneration of town centre.
- Welcome the significant tree planting, habitats and biodiversity.
- Applicants have been exemplary in their community engagement and have listened to feedback and made changes where they have been able.
- Consider whether two hours for parking is sufficient and whether merit increasing to three hours to allow users of the pool to enjoy other amenities.
- London Plan has heavily influenced the number of spaces included in the application. Given PTAL rating of 5, the benefit of the development to locality and public, in terms of amenity, it is considered on balance acceptable.
- Need effective management of parking and possible mitigation solutions during construction, noting the likely closure of the Network Rail car park.

Councillors and MP

6.45 The following Councillors and MP made representations:

6.46 Chris Philp MP supports on the following grounds:

- Welcome new leisure and pool as well as older living accommodation. Very supportive of this regeneration opportunity for Purley Town Centre
- Would like more parking spaces, although acknowledge constraints imposed by the London Plan.
- Following re-consultation, supports addition of soft play, larger gym space and alterations to changing rooms, revised proposals potentially increase the amount of parking spaces available to the public, and building fronting High Street better reflects the Local Heritage Area.

6.47 The MP has a started a petition supporting the proposal which 2,311 people have signed that states:

"To Croydon London Borough Council, the petition of Croydon residents, asks Croydon Council to approve the planning application for a new pool and leisure centre in Purley, with surrounding regeneration, as soon as possible.

A pool for Purley is essential, for local schools and people of all ages across Croydon South. We also welcome that the construction cost of the new pool and leisure centre will be covered by the revenue from the flats and care home rooms for older people, thus not costing Croydon taxpayers anything, but the ownership and management of the leisure centre and pool will still transfer to the Council once it is built, so we urge the Council to take swift and appropriate action to approve this."

(Officer note: the financing of the leisure centre is subject to commercial discussions between the developer and the Council in its capacity as landowner. The planning application viability appraisal assumes a cost to the Council for the leisure centre. The contract for the leisure centre is separate to the planning decision and subject to commercial agreement).

6.48 Councillor Brew supports on the following grounds:

- Site has been idle for 25 years
- Vastly improved leisure experience adds an attractive square to the public realm and access from the High Street to the station is greatly improved.
- Leisure centre, shops and restaurants will add to the quality of the offering and likely to generate extra footfall which will benefit local businesses.
- Final design is a significant improvement on earlier iterations.
- Welcome the concept of an integrated retirement community, though I have concerns at its affordability for local residents.
- Concerned car parking provision is inadequate with no all-day parking used by rail commuters and lack of alternatives.
- Increased population of the town centre (inc. other developments) would impact the capacity of the local GP surgeries.
- Following re-consultation, welcomes provision of affordable housing

6.49 Councillor Dwesar supports on the following grounds:

- Delivery of a brand-new leisure centre and other valuable amenities, including soft play and a public square
- A revitalised and enhanced district centre, with improved links between Purley Station and High Street
- Likely increased footfall
- An increase in trees/biodiversity
- No viable alternative
- Following re-consultation, supports enlarged leisure centre, but remains concerned about parking provision

6.50 Councillor Ramsey supports on the following grounds:

- Echo Cllr Dwesar's comments
- Would like to see more public car parking

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (LP) (2021)

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- SD6 Town centres and high streets

- D1 London's form, character and capacity 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 Agent 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
- H13 Specialist older persons housing
- S2 Health and social care facilities
- S5 Sports and recreation facilities
- E11 Skills and opportunities for all
- HC1 Heritage Conservation and Growth
- HC3 Strategic and Local Views
- G1 Green Infrastructure
- G4 Open space
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and Woodlands
- SI1 Improving air quality
- SI2 Minimising Greenhouse Gas Emissions
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI8 Waste Capacity and Net Waste Self-Sufficiency
- SI12 Flood Risk Management
- SI13 Sustainable Drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car Parking
- T7 Deliveries, servicing and construction

Croydon Local Plan (CLP) (2018)

- SP2 Homes
- SP3 Employment
- SP4 Urban Design and Local Character

- SP5
- SP6 Environment and Climate Change
- SP7 Green Grid
- SP8 Transport and Communication
- DM1 Housing Choice for Sustainable Communities
- DM2 Residential care and nursing homes
- DM4 Development in Croydon Metropolitan Centre, District and Local Centres
- DM10 Design and Character
- DM11 Shop front design and Security
- DM13 Refuse and Recycling
- DM14 Public art
- DM15 Tall and large buildings
- DM16 Promoting Healthy Communities
- DM17 Views and Landmarks
- DM18 Heritage assets and conservation
- DM19 Promoting and Protecting Healthy Communities
- DM23 Development and Construction
- DM24 Land contamination
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- DM27 Biodiversity
- DM28 Trees
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and Cycle Parking in New Development
- DM42 Purley

- 7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF) (2024)

- 7.3 Government Guidance is contained in the NPPF and accompanied by the online Planning Practice Guidance (PPG). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a Sufficient Supply of Homes
- Promoting Sustainable Transport
- Achieving Well Designed Places

SPDs and SPGs

- 7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- London Housing SPG (2016)
- Mayor of London: Affordable Housing SPG: Homes for Londoners (2017)
- Mayor of London: Planning for Equality and Diversity in London SPG (2007)
- Housing Design Standards (HDS) LPG (2023)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- National Design Guide (2021)

Other relevant documents

- Adult Social Care & Health Croydon Council Market Position Statement (2023)
- Local Housing Needs Assessment (LHNA, 2023)
- Design Principles for Extra Care Housing for the Housing Learning and Improvement Network (2020)
- Purley Regeneration Framework (2021)
- Mayor of London: Safety in Public Space – Women, Girls and Gender Diverse People (2022)
- Part L 2021 and the Energy Assessment Guidance (2022) – cover note
- London Cycling Design Standards (Transport for London, 2014)
- Care Homes for Older People National Minimum Standards (Department of Health, 2003)
- Design Principles for Extra Care Housing (3rd edition, Housing LIN and PRP Architects, 2020)

8 MATERIAL PLANNING CONSIDERATIONS

Key Issues

- 8.1 The main planning issues raised by the application that the committee must consider are:

1. Land Use
2. Specialist Accommodation (including needs)
3. Housing mix
4. Affordable housing
5. Height, Scale and Massing, and Impacts on Local Character and Townscape
6. Character and Appearance
7. Layout, public realm and landscaping
8. Heritage impacts
9. Tall Building Policies
10. Quality of residential accommodation
11. Aspect, outlook, privacy, daylight and overheating
12. Inclusion and Accessibility
13. Impact on neighbouring residential amenity
14. Trees, landscaping and biodiversity
15. Access, parking and highway impacts
16. Flood risk and SuDS
17. Energy efficiency and sustainability
18. Environmental impacts
19. Fire safety
20. Health
21. Employment and skills
22. Archaeology
23. Telecommunications

- 24. Equalities
- 25. Financial Considerations and CIL
- 26. Human Rights

Land Use

Key Objectives and Site Allocation

- 8.2 At the heart of the NPPF (National Planning Framework) (2024) is a presumption in favour of sustainable development which meets social, economic and environmental objectives. A key objective is to significantly boost the supply of homes.
- 8.3 The site is located within Purley Town (District) Centre and is subject to a site allocation (site 30) both of which support mixed-use residential development.
- 8.4 The site is allocated in the Local Plan (Croydon Local Plan) (2018) (site 30) with the proposed use set out as “a mixed-use redevelopment incorporating public car park, new leisure facilities, including a swimming pool, and other community facilities, healthcare facility, creative and cultural industries enterprise centre, retail or residential accommodation”. It anticipated that the site would deliver between 30 to 171 homes.
- 8.5 The proposal comprises a car park, new leisure facilities including a swimming pool, retail and residential accommodation. The residential accommodation is in the form of an IRC (integrated retirement community) comprising care accommodation, extra care (assisted-living) units and independent living (residential older persons accommodation) – all restricted to people older than 55 years and supported by a range of communal facilities, some of which are open to the public.
- 8.6 The proposed mix of uses is broadly in accordance with the type of mixed-use development specified in the site allocation, and subject to compliance with the relevant development plan policies would accord with the presumption in favour of sustainable development.

Loss of retail

- 8.7 The site is within a Town Centre and Main Shopping Area, but not within a main retail frontage. There is an existing retail unit which was used as a Sainsburys supermarket until 2001 and has since been vacant.
- 8.8 Local Plan Policy SP3.12 notes that across the borough the Council will seek to maintain as a minimum, the current amount of retail floor space in Croydon, enhance the quality of retail floor space in Croydon and seek to reduce A Use Class vacancy. The detailed policies set out provisions to achieve this, including DM Policy (DM4.1) which resists the loss of ground floor Class A uses within Main Retail Frontages.
- 8.9 As the existing unit is not within a main retail frontage, the loss of retail floorspace is compliant with Policy DM4.1.

Replacement of Multi-Storey Car Park

- 8.10 The proposal would demolish the existing multi-storey car park and replace it with a smaller car park.
- 8.11 The general thrust of development plan policies is to encourage modal shift away from private car use, towards more sustainable forms of transport. London Plan Policy T6 encourages car-free development in town centres, stating that “where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy”. The Local Plan echoes this approach, although Policy SP8.17 explains that in District Centres there may be a more flexible approach based on criteria which include the need for regeneration, impacts on congestion, and lack of existing parking. Local Plan Policy DM30(d) also states that if a development results in the loss of existing car parking spaces, it must be demonstrated that there is no need for these car parking spaces at peak times.
- 8.12 The site allocation explains that the inclusion of a public car park would be acceptable as part of the redevelopment of the site but does not specify how large.
- 8.13 Whilst the direct re-provision of public car parking at previous levels would not be supported by the London Plan, a smaller car park which accords with the detailed policies of the Local Plan could therefore be justified and would be acceptable in land use terms.
- 8.14 However, the proposed new car park would be much smaller, and the impacts of the development on the transport network and the regeneration of the town centre are material planning considerations. These are assessed within the access, parking and highway impacts section of this report.

Leisure centre

- 8.15 The existing leisure centre is a community use which is protected by Policy SP5 of the Local Plan.
- 8.16 The NPPF sets-out that decisions should aim to achieve healthy, inclusive and safe places. These should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, and enable and support healthy lives, through both promoting good health and preventing ill-health.
- 8.17 It also details that to provide the social, recreational and cultural facilities and services the community needs, decisions should:
- plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments;
 - take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
 - guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;
 - ensure that established shops, facilities and services are able to develop and modernise and are retained for the benefit of the community.

- 8.18 In relation to ensuring the vitality of town centres the NPPF specifies that decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
- 8.19 The existing leisure centre was a vital community facility within the heart of the town centre, which has been closed since 2020, during the Covid-19 pandemic. It has not reopened, due to the cost of bringing it to a safe and modern standard. The proposed leisure centre would reinstate this valuable amenity and once again place it at the heart of the town.
- 8.20 The provision of the leisure centre and variety of facilities it offers (gym, swimming pool, flexible studio space, café and soft play) would help draw members of the local community together, support health and well-being, and attract visitors to the town centre (adding significant vitality). The reinstatement of this crucial social and communal hub would be a significant public benefit of the proposal.

Public Open Space

- 8.21 Part of the vision for Purley within the Local Plan is an enhanced public realm with improved accessibility and good links to open space. Policy SP7.3 in the Local Plan seeks the provision and creation of new green spaces. With particular focus for areas deficient in access to nature, play areas, and publicly accessible recreational open space.
- 8.22 The Purley Regeneration Framework notes that Purley Leisure Centre is a key development site on High Street which if redeveloped could provide good quality outdoor public space. It identifies it as a potential permanent space for community and cultural spaces. In relation to the public realm, it suggests developing a central public space on the High Street that focusses on the pedestrian experience and encourages people to stay in the area longer. It notes that this central space could also provide better connections through the District Centre. It also suggests improving pedestrian connections to and from the High Street and to improve pocket sites and lanes that will help make the town centre safe and accessible.
- 8.23 The document also notes that only 3% of Purley is defined as accessible open space.
- 8.24 The proposed development would introduce a new public space and route through the site connecting Whytecliffe Road South to the High Street. The public square would measure approximately 540sq.m. It would be well-landscaped and curated and potentially be used for a number of community events including markets. It would also act as a focal point for the town centre and from which the community activities can flourish. The planting through the route and the square gives a connection to the natural environment, and there will be opportunities for interactive play and seating. The provision of the public space and route would contribute significantly to delivering the vision within the Purley Strategic Framework and could potentially be the catalyst for the wider objectives beyond the site being brought forward.
- 8.25 It is noted that a lot of the surrounding area is categorised as having a local park deficiency and also appears to be deficient in small open spaces and pocket parks. The London Plan Policy G4 explains that particularly in areas of open space

deficiency, development should create areas of publicly accessible open space. It explains that such spaces provide a wide range of social, health and environmental benefits, and are a vital component of London's infrastructure. The creation of open space is viewed as essential and the proposed provision of open space weighs heavily in favour of the proposal, further analysis of this aspect of the proposal can be found further down the report under the "Layout, Public Realm and Landscaping" section of this report.

- 8.26 The proposed public open space would not only be acceptable, but it would also be a significant public benefit.

Integrated Retirement Community.

- 8.27 The proposal includes an Integrated Retirement Community which is intended to be managed and operated by a single operator – as a single fully integrated community.
- 8.28 As part of the IRC 40 full-time care bedrooms (use class C2) have been included within the development. These are with en-suite and approximately 28sq.m in size.
- 8.29 There are also 57 extra care (also known as assisted living) units (use class C2/C3). These are a mix of one- and two-bedroom self-contained units ranging from 40sq.m to 80sq.m and served by a balcony. Extra care is defined as personal care and support for people in need of such care by reason of old age, disablement or past or present mental disorder. Generally, residents receive at least 4 hours of personal care per week.
- 8.30 There are also 123 independent living (also known as supported living) units (use class C3). These are a mix of one- and two-bedroom standard C3 sized units served by a balcony. They are designed and laid out as typical residential accommodation, although have the option of some care provision.
- 8.31 The application sets out information about how an IRC works, explaining that by providing older people with purpose-built accommodation and shared communal facilities, they encourage people to retain their independence for longer and help to combat loneliness. The three types of accommodation provided mean that residents may be able to move between these as their needs change over time. This type of development means residents may receive increased levels of care within their own home over time (due to the presence of on-site carers), or move into the care accommodation, either temporarily (for example whilst recovering from injury or illness) or permanently, all whilst remaining within their community and support networks.
- 8.32 The Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year. The principal of new housing is therefore supported.
- 8.33 Local Plan Policy DM2.2 explains that proposals for supported living and sheltered accommodation will generally be supported in accordance with the London Plan, Annex A5, Specialist Housing for Older People (superseded by Policy H13).

- 8.34 London Plan Policy H13 specifies that in relation to specialist older persons housing boroughs should take account of local housing need, location (being well-connected to facilities, social infrastructure, health care and public transport) and provision of people with dementia. It also sets out housing quality and facilities requirements and a requirement to deliver affordable housing.
- 8.35 London Plan Policy H13 also notes that London is a 'young city' but is expected to experience substantial growth in its older population, and that care home accommodation (C2) is an important element of the suite of accommodation options for older Londoners.
- 8.36 Local Plan Policy DM2.1 specifies that new residential care or nursing homes will only be granted if there is a need for the particular services provided by the home in supporting with the care of residents of Croydon.
- 8.37 The Local Plan notes that analysis of changing needs for services supplied by the nursing and residential care home market evidences a 'saturation point' has been reached for some customer groups or categories of people in need. It then goes on to explain that Croydon experiences a range of challenges arising from the significant number of nursing and residential care homes that continue to be sited in the borough. These challenges include excess demand on a range of local health and social care services.
- 8.38 The principle of residential accommodation is acceptable, in particular where it supports the needs of older people in the borough. As part of this residential development, a component of care accommodation is also acceptable, subject to it meeting an identified local need. Whilst it is therefore important to establish the borough wide need for the type of proposed accommodation, the principle of an IRC which addresses local needs is acceptable.
- 8.39 The IRC at ground level would include a range of communal and commercial uses bar/bistro, restaurant, spa etc), some of which will be open to the public. Policy DM4.2 (and Table 5.3) set out acceptable ground floor uses within town centres. As the site is within the Town Centre, but not within a main or secondary retail frontage, all uses as long as they comply with Policy DM4.3, which requires demonstration of how the ground floors will be used.
- 8.40 The end users occupying the ground floors will be the leisure centre (operated by the Council) and the other spaces will be used under the wider operation of the IRC. The proposal is therefore in accordance with Policy DM4.3.

Specialist Accommodation

Local Need for Older Persons Accommodation

- 8.41 The projected need can be estimated by looking at current supply and demand, and projected population growth and life-expectancy. As part of the need assessment Officers have considered forecasts from the Council's Local Housing Assessment (LHNA), the London Plan and the applicant's own research.
- 8.42 The LHNA (2023) analysed need for specialist accommodation from 2021-2040. It shows that there would be significant increases in the older population over that period, with the number of those aged over 65 expected to increase by 58%

(30,800 additional people) and aged over 75 expected to increase by 75% (18,270 additional people).

- 8.43 Over the period to 2040 there is a projected need for around 2,300 additional housing units with support (e.g. sheltered) – with the majority as affordable housing and around 1,500 additional housing units with care (e.g. extra care) – with the majority as market housing.
- 8.44 There will also be a need for additional residential and nursing care bedspaces, although the current Adult Social Care and Health (ASCH) strategy is to transfer some of the need for residential care towards extra care.
- 8.45 There are already a large number of care homes covering extra-care, residential and nursing care around Purley. The proposal is for an IRC of which there are none presently within the borough. Furthermore, it is noted that none of the existing care facilities are within the town centre. Therefore, it is considered that the proposal offers an alternative to the existing care homes by virtue of its housing model and its location.
- 8.46 Specialist Older Persons Housing units (SOPH)
- 8.47 The proposed extra care and independent living units fall under the umbrella of SOPH under the definition of the London Plan. However, within the LHNA these are separated into supported housing (independent living) and extra care, which allows for more specific targeting of needs.
- 8.48 The following current (as of 2021) and future need projections for SOPH within the LHNA (2023) shows a significant requirement for additional bedspaces for both supported housing and extra care (other than the present surplus of affordable supported housing).
- An 84-unit shortfall for market supported housing increasing to 823 by 2040, which equates to 43.3 needed per year from 2021-2040
 - A 65-unit surplus for affordable supported housing changing to 1470 shortfall by 2040 which equates to 77.37 needed per year from 2021-2040
 - A 496-unit shortfall for market extra care housing increasing to 898 by 2040 which equates to 47.26 needed per year from 2021-2040
 - A 207-unit shortfall for affordable extra care housing increasing to 624 by 2040 which equates to 32.9 needed per year from 2021-2040
- 8.49 The London Plan sets an annual benchmark of 225 new Specialist Older Persons Housing units per annum to be provided in Croydon (period up to 2029).
- 8.50 The proposal does exceed the current (2021) shortfall identified in the LHNA for market supported housing (independent living units), although by averaging the projected demand by 2026 there would be sufficient demand for the number of these units proposed.
- 8.51 The proposal does not exceed the current (2021) shortfall identified in the LHNA for extra care units when taking into consideration extant permissions for this type of accommodation (21 rooms approved at 36 - 38 Smitham Bottom Lane ref. 21/05039/FUL).

8.52 Further the London Plan benchmark does not appear to have been met for the overall provision of Specialist Older Persons Housing units (London Plan does not differentiate between supported housing and extra care).

8.53 It is also noted that the ASCH team raise no objection to the provision of the extra care units.

8.54 Overall, it is considered there is a demonstrable need for the proposed provision of SOPH in accordance with Local Plan and London Plan policy.

8.55 Care accommodation

8.56 The proposal includes 40 beds for care. The applicant has set out that the current intention is for these to be equally split between neurological and memory care. They require some flexibility to ensure that the scheme can respond to emerging requirements, and this will be a matter for the operator to determine. The bedspaces must therefore be considered as a flexible care use that could cover either nursing or residential care.

8.57 Croydon's Market Position Statement notes that Croydon has the largest care market in London (and is a net importer of placements into care homes), with 124 registered care homes made up of 92 residential and 32 nursing homes. By comparison Bromley has 54 care homes and Sutton 73 care homes.

8.58 The LHNA (2023) shows that for residential and nursing care there is presently (2021) a surplus of 12 bedspaces, although that can be broken down into an under supply of residential by 297 bedspaces and over supply of 309 nursing bedspaces.

8.59 Future projections show a need for care with the Council's LHNA showing 1,534 (1,025 residential and 510 nursing) additional bedspaces are required by 2040, resulting in an annual need of 81 bedspaces. Presently, potentially 90 additional care bedspaces are in the pipeline of extant permissions. By 2026 (expected completion of development) there would be a projected need of 156 care bedspaces, and therefore the provision of the proposed 40 care bedspaces would likely still meet a need (noting the current surplus and pipeline bedspaces and subject to its type and affordability).

8.60 The London Plan states that to meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year.

8.61 The applicants research shows that circa 14.1% of the Croydon population is aged 65+ compared to 19.1% in the UK. By 2028, the borough is expected to see an increase of 2,747 in the 75+ age group, a 10.6% increase on the 2023 level, and the population aged 85+ to increase by circa 29.1% between 2023 and 2033 (increase of 2,182) individuals. This demonstrates a clear trend towards an ageing population.

8.62 The applicant has undertaken their own analysis of the estimated care need of Croydon. They initially note that older care home stock is generally substandard and that there has been an increased preference for care homes to be fully en-suite, and that this is now standard for all new care homes.

- 8.63 When adjusting the applicant's data to the correct number of bedspaces in the pipeline, their analysis suggests a 107 oversupply of single care bedspaces rising to a 94 bedspaces shortfall by 2028. It also shows a 191 undersupply of en-suite single bedspaces, which is set to rise to 392 by 2028. This suggests that 33.5 single care bedspaces a year should be built between 2023 and 2028. Therefore by 2026, 134 bedspaces would be needed, which the pipeline bedspaces (90) combined with the proposed bedspaces (40) would be slightly under.
- 8.64 Overall, both the evidence from the LHNA and the applicant suggests an increased need for appropriately designed care bedspaces that this proposal could meet.
- 8.65 However, the LHNA mentions that many recent market extra care schemes have tended to be focused towards the 'top end' of the market and may have significant service charges (due to the level and quality of facilities and services). Such homes may therefore only be affordable to a small proportion of the potential market, and it will be important for the Council to seek a range of products that will be accessible to a wider number of households if needs are to be met. The care units must be viewed within the wider context of the IRC and the different levels and stages of care it offers. It is logical from a business and operational approach to cater for a wide spectrum of care needs from minimal to full-time care. This allows for people to transition between the different care components of the development based on their needs and thereby reduces the stress and disruption moving may otherwise. The quality of facilities and accessibility would generally be superior to older care homes and therefore more sought after; the effect of this would be to add choice to the market.
- 8.66 The Housing Learning and Improvement Network (Housing LIN) who are recognised by government and the housing with care sector as a leading 'knowledge hub' on specialist housing have assisted the Council with considering the care components of the development. They have reviewed the proposal and noted that there did not appear to be any comparable facilities currently in Croydon, or in neighbouring areas, suggesting potentially that this proposal will address unmet need in this niche market locally.

Summary

- 8.67 Overall, evidence suggests there will be a future need for the proposed supported housing. Furthermore, there is also a continual need for additional housing (including the proposed independent living homes) throughout the country as outlined in the NPPF. The evidence available suggests that would be a future quantitative need for the proposed extra care units. The provision of these units also aligns with the Council's ASCH team's strategy to increase the number of extra care units. The development of a community with different levels of care that can be adjusted to an occupant's evolving needs would meet the ASCH teams desire for the level of care to grow with the resident's needs.
- 8.68 The evidence available suggests that there would be a future quantitative need for the proposed care units. The provision of these would be at odds with the Council's Adult Social Care team's strategy to reduce the number of care units. The Market Position Statement explains that Croydon is a net importer of placements into that market which puts a huge financial pressure on social care and health provision in the borough, therefore it is important that any future development avoids exacerbating this.

- 8.69 The evidence available suggests that would be a future quantitative need for the proposed extra care units, and that they would provide an alternative form of care due to their integration within the IRC and access to its facilities.
- 8.70 The provision of within an IRC also aligns with the Adult Social Care team's strategy to increase the number of extra care units. The development of a community with different levels of care that can be adjusted to an occupant's evolving needs would meet the ASCH teams desire for the level of care to grow with the resident's needs.
- 8.71 Officers must take a balanced approach between the quantitative evidence and the housing offer as a whole, and the strategy of the Council's ASCH team. The care units must be viewed within the wider context of the IRC and the different levels and stages of care it offers. It is logical from a business and operational approach to cater for a wide spectrum of care needs from minimal to full-time care. This allows for people to transition between the different care components of the development based on their needs and thereby reduces the stress and disruption moving may otherwise. The quality of facilities and accessibility would generally be superior to older care homes and therefore more sought after.
- 8.72 To minimise the impact of importing residents from outside of Croydon, a marketing plan can be secured by a legal agreement to ensure that the units are initially marketed at Croydon residents. Furthermore, to reduce the potential for future residents from other boroughs becoming a financial burden on the borough, future residents from outside the borough should be able to demonstrate additional financial security, which again can be secured within the legal agreement.
- 8.73 Given that the proposal is intended to be age restricted and has been assessed as such, to ensure that the provisions in relation to matters such as play space, unit mix, etc. are appropriate for the development an age restriction condition is recommended. The development is for those over 65, but the recommended condition would restrict it to those over 55 to avoid excluding younger partners of older residents, or those close to retirement age.
- 8.74 Whilst the provision of care accommodation is generally not supported by the Local Plan, the integration of the care facility within the IRC would temper that harm, and overall the proposed IRC would provide a mix of housing, extra care and care units which would contribute positively to the supply of accommodation within the borough.

Housing Mix

- 8.75 Strategic Objectives 3 and 7 of the Local Plan seek a choice of housing for people at all stages of life, that foster safe, healthy and cohesive communities.
- 8.76 Local Plan Policy SP2.7 states that the Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes. Policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms, and Local Plan Policy DM1.1 requires major housing developments in this location to provide at least 40% of homes with 3-bedrooms or more.

- 8.77 Only one 3-bedroom home has been provided within the proposal. However, in addition, 55 of the 180 units are large 2-bedroom/4-person units that exceed 74sq.m, which is the minimum size for a 3-bedroom unit. Within the submitted DAS the applicant explains how these are designed to provide larger homes to older people with a lifetime of possessions (rather than young children at home) and also shows that some of these units can be remodelled to become 3-bedroom units. Overall, 56/180 (31%) of homes would be at least the minimum size of a 3-bedroom home.
- 8.78 The need for larger homes was identified in the Croydon LHNA to address overcrowding and to provide housing for families with children. Whilst significant overcrowding exists, the LHNA also identifies that 57% of older person households in Croydon have at least 2 spare bedrooms (compared with 21% for non-pensioner households).
- 8.79 Within their submission the applicant has argued that there is not a market for three-bedroom apartments within IRC's. They note that older households are typically smaller and need 1-2 bedrooms. They also highlight that the House of Commons Briefing Paper on Housing an ageing population (2021) identifies that 45% of households led by someone aged 65 or over were single-person households and 55% of households led by a 65+ year old had at least two spare bedrooms by this measure.
- 8.80 The LHNA explains that the provision of a choice of attractive housing options to older households is a component of achieving a good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run, and it follows that this may free up under-occupied homes for families.
- 8.81 The proposed housing mix will therefore offer an appropriate mix of homes for older people and contribute to the Local Plan's strategic objectives 3 and 7. In order to ensure that this benefit is delivered and justify the alternative mix of homes, a condition is recommended to restrict the ages of occupiers to 65s+.

Affordable housing

- 8.82 Both the London Plan and Local Plan require affordable housing, with a shared strategic target of 50%. It should be noted that as the London Plan (2021) was adopted after the Croydon Local Plan (2018), where there is a policy difference, the most recent adopted policy should take precedence.
- 8.83 The London Plan (2021) sets a strategic target for 50 % of all new homes to be affordable. London Plan Policy H5 sets a threshold approach to viability at a minimum of 50% for residential development on public sector land. London Plan Policy H6 refers to affordable housing tenure. The split should be a minimum of 30% low-cost rented homes as either London Affordable Rent or Social Rent, a minimum of 30% intermediate products including London Living Rent and London Shared Ownership and the remaining 40% to be determined by the borough as low cost rented homes or intermediate products based on identified need; in Croydon this is the 60:40 ratio (affordable rent: intermediate) set out in Policy SP2.4.

- 8.84 In line with the Viability Tested Route set out in London Plan Policy H5(F), the applicants submitted a financial viability appraisal prepared by Avison Young which has been independently assessed by Carter Jonas and the GLA. The various inputs to the appraisal have been scrutinised and agreed, and following the GLA's methodology for viability reviews, the appraisal has revealed that with no affordable homes, the scheme would realise a deficit of £2,869,966.

Affordable housing offer

- 8.85 Affordable housing is a key strategic aim of the London Plan and the Local Plan. The developer cannot meet the strategic level of affordable housing as sought by Policy H4 of the London Plan or SP2.5 of the Local Plan. However, the scheme proposes to provide 10% affordable housing on site (by habitable room and units). This includes 18 affordable units (3x 2-bedroom, and 15x 1-bedroom), all of London Living Rent tenure. These units would be pepper-potted throughout Blocks C and D. The affordable unit mix has been supported by the Council's Senior Affordable Housing and Enabling Officer, noting that the greatest need for older peoples affordable housing in the borough is for 1-bedroom homes.
- 8.86 With these affordable homes, the viability appraisal outturns a deficit of £5,130,432.
- 8.87 The appraisal adopts a standardised profit margin of 17.5% for residential (6% on affordable) and 15% for the commercial , which would provide the developer with a profit of circa £30m (less the deficit). The deficit is smaller than the profit, meaning that although the reduced profit would be less attractive for the developer, it is still deliverable.
- 8.88 It is clear that the development is not viably able to provide additional affordable housing, and therefore it would provide the maximum viable amount of affordable housing in compliance with Policy H5 of the London Plan.

Table: Viability Assessment

Affordable housing	Benchmark land value	Gross development value	Total Development Costs (inc. BLV)	Surplus / deficit	Viable Yes/No
None	£2,101,000	£180,282,072	£183,152,038	£2,869,966	No
10%	£2,101,000	£176,831,292	£181,961,724	£5,130,432	No

- 8.89 As the scheme is in significant deficit prior to any affordable housing deductions, the proposed offer can be considered the maximum reasonable amount of affordable housing.

- 8.90 A key consideration within the viability appraisal, is that the new leisure centre has been modelled as having a build cost of approximately £19m and being leased to the Council for approximately £830,000. This figure is subject to commercial discussions between the Council and the developer and may change (with those changes reflected in a future viability review). It is however clear that the development viability has modelled a substantially subsidised leisure centre, being funded by the IRC. Therefore, the development can be considered “enabling” development and rather than providing a substantial amount of affordable housing, a key benefit is the delivery of the leisure centre.
- 8.91 The provision of a new leisure centre is a significant public benefit and must be weighed against the shortfall in affordable housing.
- 8.92 An early-stage review mechanism should be secured within the s106 agreement should an agreed level of progress on implementing the scheme have not been achieved within 18 months of signing the s106 agreement. Furthermore, a late-stage viability review should be secured within the s106 agreement to determine whether at that stage further contributions to affordable housing can be made. Noting that areas such as rights to light claims and build costs will be more certain at that stage. The GLA’s guidance will be followed when drafting the review mechanism clauses within the s.106 agreement. As the development is a specialist IRC, and older persons housing typically uses different funding models to conventional residential development (sometimes including an “exit fee” payable on sale, which provides the landowner with additional income, an additional clause is recommended to ensure that the exit fee is accounted for within the appraisal.
- 8.93 In addition to the above the following matters would need to be secured in the s106 agreement:
- Maximum Exit Fees of 1%
 - The Owner will submit a marketing plan for all the open market and affordable homes to the Council 6 months before practical completion as to how they will market and promote the units in Croydon as well as more widely.
- 8.94 Overall, the proposed level of affordable housing falls short of the targets set out in the London Plan and Local Plan policies. However, the financial viability assessment demonstrates that the affordable housing offer is the maximum reasonable level of affordable housing achievable. The provision of the leisure centre has a significant impact upon the ability to deliver a policy compliant level of the affordable housing and these matters must be weighed in the planning balance.

Height, Scale and Massing, and Impacts on Local Character and Townscape

- 8.95 The NPPF states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities
- 8.96 London Plan Policy D3 requires all developments to make the best use of land by following a design-led approach that optimises site capacity whilst responding to the site’s context and capacity for growth. Policy D9 refers to tall buildings and provides

criteria for assessing the visual, functional and environmental impacts of such buildings.

- 8.97 Local Plan Policy SP4.1 states that the Council will require development proposals to respect the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Furthermore, the proposals should have regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportions and mass. Development proposals should also make a positive contribution to a coherent public realm, streetscape and wide cityscape, and incorporate the highest quality materials and design appropriate to its context. Policy SP4.1 states that development proposals should be of a high quality, which respect and enhance Croydon's varied local character and contribute positively to public realm and townscape. In addition, Policy SP4.2 requires development proposal to be informed by the distinctive qualities and identity of the relevant Places of Croydon.
- 8.98 Policy DM10.1(c) specifies that development proposals should respect, the pattern, layout and siting of development, and the scale, height, massing, and density. It should also respect the appearance, existing materials and built and natural features of the surrounding area, and the Place of Croydon in which it is located.
- 8.99 Policy DM10.7(b) and (d) outline that in order to create a high-quality built environment, proposals should demonstrate that high quality, durable and sustainable materials that respond to the local character are incorporated and the roof-form positively contributes to the character of the local area and responds to local context.
- 8.100 The Local Plan place-specific policy, DM42.1 requires buildings to "Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys", which has already been consented (The Purley Baptist Church). The local plan review version of this policy suggests that within the Tall Building Zones (of which much of the site is within) building heights of 6-12 storeys are appropriate.

Existing Building

- 8.101 The existing leisure centre, whilst somewhat utilitarian in its appearance, does have some architectural merit. Although its style contrasts dramatically with the predominant traditional architectural styles of the town centre the façade directly facing the High Street is stepped and of proportions which echo a high street scale and configuration. This section of the existing building is equivalent of three storeys in height with a glazed top floor frontage and brick lower storey, with pillars and transoms which give a nod to shopfront design but mostly now contain vents for the leisure centre.
- 8.102 That said, the multi-storey car park is a prominent and unattractive structure within the town centre, detracting from its appearance. As such, overall, the loss of these buildings is considered acceptable in design terms.

Tall Building Policy Context

- 8.103 London Plan Policy D9 requires locations appropriate for tall buildings to be identified through the development plan and requires assessment of impacts from a

visual, functional and environmental impact. All these aspects are considered throughout the various sections of this report and summarised at the of this section. Policy SP4.5 of the Local Plan relating to tall buildings states that they 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. The application site lies within Purley District Centre and has a very good PTAL being sited very close to Purley Station, as such the proposal meets the locational requirements for the provision of a tall building.

8.104 Local Plan Policy SP4.6 states four criteria for tall buildings in order for them to be acceptable in these locations:

- 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.

8.105 Local Plan Policy DM15 states that 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.

8.106 In the context of policies SP4 and DM15 of the Local Plan, a tall building is classified as tall if it is higher than six storeys or 25m.

8.107 The Local Plan place-specific policy, DM42.1 requires buildings to “Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys”, which has already been consented (17-storey The Purley Baptist Church).

8.108 The Draft Local Plan review currently carries no planning weight. However, it is noted that the revised version of this policy suggests that within the Tall Building Zones (of which much of the site is within) building heights of 6-12 storeys are

appropriate. This is based on the Allies and Morrison 2024 Tall Buildings Study which identifies up to 12 storeys as appropriate for the site's location based on factors including the context and local character.

- 8.109 The supporting text to Policy DM42 of the Local Plan notes that the area has a varied topography, which presents opportunity for tall buildings.
- 8.110 In this location a building is considered tall at 6-storeys and above, and the height parameter of the area set by Local Plan Policy DM42 is 8-storeys. The proposed development is up to 12-storeys and therefore would be considered tall and also beyond the local height parameters set by Policy DM42.
- 8.111 The London Plan policy for tall buildings, D9, is detailed and provides an appropriate framework for the consideration of tall buildings. London Plan Policy D9 can be broadly defined into two main parts, Parts A and B which relates to the locational aspect of tall buildings, Part C which is broader and captures a number of planning considerations. There is also part D, which relates to public access (for note the development is considered to comply with part D due to the proposed leisure centre, public route and square – see the relevant assessment below).
- 8.112 Part A and B of London Plan Policy D9 provides a definition for tall building, as well as appropriate locations for tall buildings that are to be defined through the local plan. In the context of the Local Plan, the development, whilst located in a highly accessible location, exceeds the height requirements of place Policy DM42. As such the development does not comply with the tall building designation aspect of London Plan Policy D9, specifically parts A and B (that said the Local Plan review would designate buildings up to 12-storeys as appropriate in this location).
- 8.113 It is important to note that the Master Brewer case (London Borough of Hillingdon, R (on the application of) versus Mayor of London (2021)) clarified that a proposal can still comply with Policy D9, when read as a whole, where it does not meet parts A and B, but does meet the tests of Part C. The fact that the scheme does not meet a specific tall building designation is not fatal to the scheme.
- 8.114 It should be noted that planning permission (ref. 20/06224/FUL) has been granted at nos. 922 to 930 Purley Way, for three apartment blocks that were 6, 9 and 12-storeys in height. The report produced for the Planning Committee in August 2021 sets out that whilst the development would exceed the height, it was not considered to create 'a landmark building' which competes with the Mosaic Place development. Instead, it was considered that the 9-storey building would complement predominant building heights that included an 8-storey flatted block set at higher land level on Russel Hill Road.



Figure 4 - CGI of development ref. 20/06224/FUL taken from junction of Foxley Land, Purley Way and Pampisford Road junction.

8.115 Furthermore, in April 2024 the Planning Committee resolved to grant a 9-storey development (ref. 21/01753/FUL) on the site opposite the application site (nos. 26-52 Whytecliffe Road South). The committee report commented that the development is not of a height that would rise significantly above prevailing heights, that it would form a high-rise landmark.



Figure 5 - CGI of development ref. 21/01753/FUL on Whytecliffe Road South.

Height and massing

- 8.116 The immediate townscape is very varied with remnants of the original late nineteenth century plots giving a fine grain to this area of the town centre in part. Later commercial, residential and infill development is characterised by larger footprint buildings of varying height. High Street and Whytecliffe Road South both have a relative eclectic mix of earlier buildings (both Victorian and Mock-Tudor styles) coupled with more significant development infills from the 1980's to the present day. The heights range from typically 2/3-storeys for earlier buildings rising to up to 6-storeys for more recent developments.
- 8.117 In massing terms, the proposal comprises four blocks. These have evolved through pre-application discussions in terms of the modulation and variance in height across the site.
- 8.118 The four blocks have been labelled A-D.
- Block A would front High Street and would be 5-storeys tall with a two-storey link to Building B.
 - Block B: 10-storey building that fronts the proposed public square and the public route linking Whytecliffe Road South to High Street. The building would adjoin Buildings C and D.
 - Blocks C and D: Building C is 9-storeys and Building D 12-storeys fronting Whytecliffe Road South.



Figure 6 – Layout of the blocks.



Figure 7 – Massing of the blocks

Block A

- 8.119 In the immediate context it is considered that the height and scale of Block A is appropriate. The massing and steps presenting a 4-storey height to Woburn Avenue provides a suitable transition from the 3-storey (with roof) to the adjacent Purley Parade. The full 5-storeys fronting the corner of the high street announces a gateway point into the public space and leisure centre setting. The proposed public square gives the building a suitable degree of prominence and the significant gap to no. 48 High Street (2-storeys tall) ensures the disparity would not be visually jarring. The 4/5-storeys is also read in the context of the 4-storey (with roof) building opposite (nos. 909-921 Brighton Road). The chamfers on the corners of the building appear proportional to both the building and the other existing chamfers on the high street parade.
- 8.120 The amended drawings have helped consolidate the massing and form of this block, which was previously overly complex. The form now appears to respond better to its context and varying conditions across the site.

Block B

- 8.121 This building would be set back from the High Street between Block A and Whytecliffe Road South behind. Its siting helps to reduce the overall impact of the scale and design on the surrounding area. However, the 10-storey scale within the middle of the site is at odds with the established development pattern and dwarfs the adjacent two-storey homes. The DRP noted that the design of the new building should reflect the transition between fine grain of high street and wider grain of Whytecliffe Road.

- 8.122 Its mass and height would be readily visible from Woburn Avenue and when you arrive at the public square. The scale of the development and its linear massing, notably this component, was described as a mega-structure by the DRP and it continues to have this form. Despite some efforts to vary the architectural dressing of the tiers of the building and create a gap to Block D, the elevations still appear monolithic within the context of Purley Town Centre. The applicant has indicated that the amount of development is necessary to meet the critical mass needed to deliver the scheme as a whole and its wider benefits.

Block C

- 8.123 Block C would be 9-storeys (7-storeys with a further 2-storeys set-back) high. Its form is relatively simple with the set-back storey's typical of development of this scale (to limit the visual mass at street level). The adjacent building (no. 51-61 Whytecliffe Road South) is 6-storeys tall, and the planning committee have approved a 9-storey development opposite. Overall, the massing of this block is relatively comfortable with both the current and emerging development context on Whytecliffe Road South.

Block D

- 8.124 Block C would present a continuous 12-storeys with no setbacks. It would act as a marker for the route to the public square and the focal point of the development. It would sit adjacent to a 6-storeys tall building (no. 21 Whytecliffe Road South), although with a reasonable degree of separation, and opposite the approved aforementioned 9-storey development. Whist sat amongst the taller buildings within the town centre, it would stand appreciably higher than all of these and appear as a focal point along Whytecliffe Road South. Given the higher and more varied roofscapes of Whytecliffe Road South compared to the High Street, and its position at the gateway to the public route to the square, it is considered appropriate for the tallest element of the proposal to be sited here.
- 8.125 The proposed block reads as relatively bulky, particularly the depth of the block when viewed from Purley Station, which is partly due to its footprint relative to its height. However, the kink in the building on the southwest elevation does help to alleviate the bulkiness to some extent.
- 8.126 Officers have stated through the pre-app process that to justify Block D being a tall building (and therefore not policy compliant), the architectural design must be exemplar and provide a positive contribution to the wider townscape. As discussed, further down, the block has a distinctive basketweave design and officers are relatively comfortable with the architectural approach of this block.

Views

- 8.127 In terms of long-range views, the development would rise above prevailing heights, and the 12-storeys would appear as a relative high-rise landmark, albeit lower than the 16-storey Mosaic Place (formerly Purley Baptist Church) and 12-storey nos. 922-930 Purley Way, both of which are under construction. The proposed layering of the heights is logical with the height of Block A relating to the lower scale of the Local Heritage Area (LHA) and the height increasing towards the taller buildings of Whytecliffe Road South on the periphery. This is reflective of the emerging

townscape with the lower height of the LHA in the centre remaining fairly consistent and taller developments emerging in the surroundings.

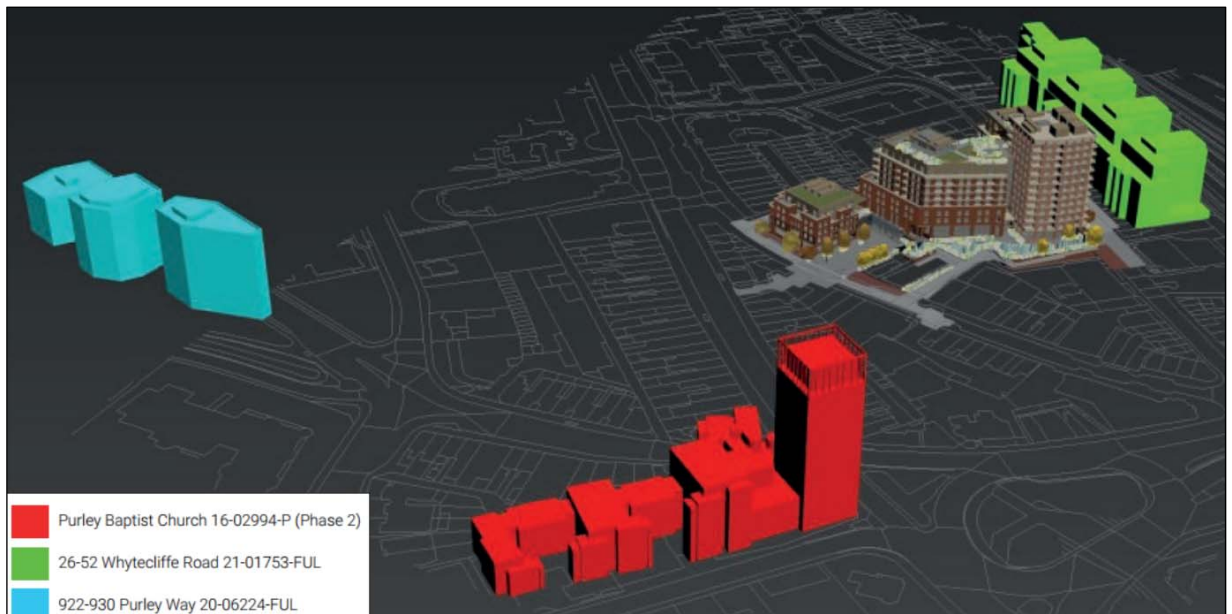


Figure 8 – Purley Town Centre massing context

- 8.128 The applicant has undertaken model testing to demonstrate the visual impact of the proposed development from different viewpoints. They have used a mix of wirelines and actual visual representations to show these.



Figure 9 – Map of location of verified views

- 8.129 Six views were taken of the development from the northeast of the application site. The furthest view (no.4) from the NE is from Christchurch Road at the junction with Whytecliffe Road north. This view looking south westwards shows that the existing car park is not visible, but that the proposal would be clearly visible above the intervening 4-storey buildings on Whytecliffe Road South. In this view the linear mass of Blocks B, C and D is apparent.
- 8.130 From a closer view (no. 5) from a similar perspective from Whytecliffe Road South next to Astoria Court, the mass of the proposal would be apparent through the large gap between Astoria Court and no. 75 Whytecliffe Road South. Looking in the same direction from Woburn Avenue almost the entire mass above the 2-storey terraces would be apparent (see below).



Figure 10 – View 5

- 8.131 When initially travelling south down Brighton Road the development would not be immediately visible with only the tallest most parts peaking above Purley Parade (view no. 6 – see below). As you move closer more becomes partially visible but still Purley Parade largely obscures the view. Once you reach outside (nos. 909-911 Brighton Road) the height and mass become more visible behind Block A (view no. 12).



Figure 11 – View 6

- 8.132 Looking south eastwards from Brighton Road towards Downslands Shopping Precinct (view no. 10), where there are breaks in the terrace and lower heights, both the 10-storey and 12-storey element are seen above the roofs (it is unlikely to be visible behind the 3 and 4-storey sections of terrace along this section of Brighton Road (between Andrews Estate Agents and the gyratory)).

- 8.133 A further view (no.8) from the LHA looking north eastwards from the high street outside no.1 High Street. Shows that the mass of the 12-storey element would be visible over nos. 24 and 26.
- 8.134 Two views (nos. 1 and 2) looking northeast along Whytecliffe Road South shows that the 12-storey element would be prominent in views along the street.
- 8.135 When viewed (no. 9 – out of shot of above map) from Approach Road looking north the 12-storey element would be visible above the train station. In the emerging context the 9-storey development would also be visible from this view, so these developments would be read together.
- 8.136 When viewed (no. 13) looking north eastwards from outside the former Baptist Church development on Brighton Road the mass of both the 10-storey and 12-storey elements would be prominently visible above the LHA.



Figure 12 – View 13

- 8.137 In a view from Croham Hurst Woods the proposal would be large and prominent but also read within the emerging context of the other taller developments within or close to the town centre.

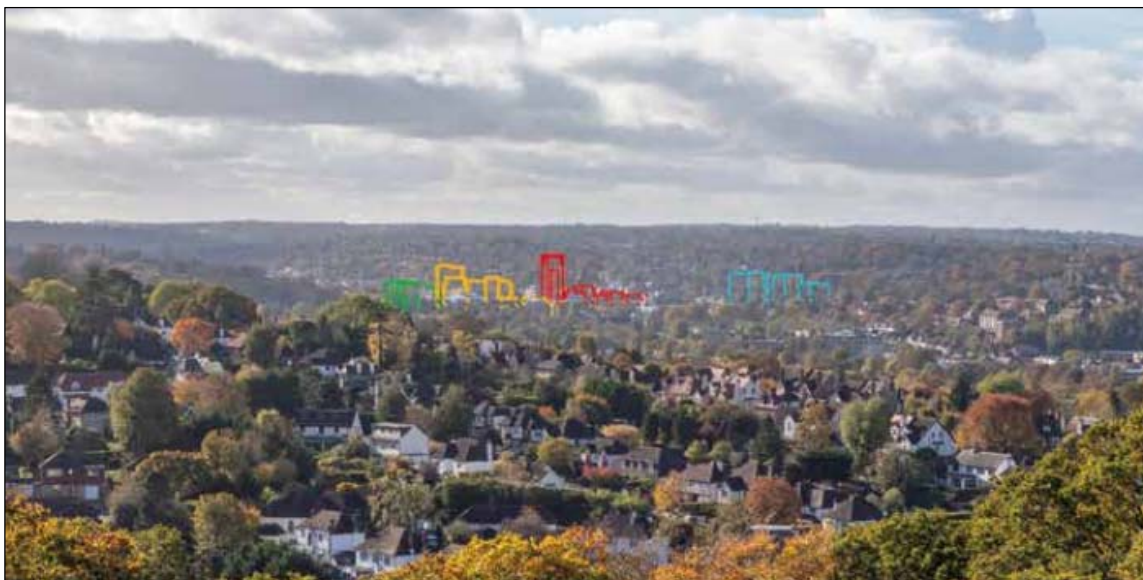


Figure 13 – View from Croham Hurst Woods

- 8.138 Overall, the proposed massing across the site is significant and as a result has the potential to dominate the Purley Town Centre townscape. There is little to no relief between the proposed blocks which are bulky in comparison with the buildings across the wider townscape. This is particularly problematic from views: 4 Whytecliffe Road South, 8 High Street, 13 Brighton Road at Purley Road.

Height and mass conclusion

- 8.139 The proposal would undoubtedly have a significant impact upon the Purley Town Centre skyline. There are other large buildings of a similar height either approved or under construction within the town centre and therefore the height, whilst slightly taller than others and lower than the tallest landmark building, would not appear incongruous. However, the volume of the mass, notably Block B and the large continuous form of Blocks B, C and D combined would result in a very large volume of unbroken mass. The aforementioned taller buildings tend to sit on the edge of the town centre and slightly within their own context, whereas the development and Block B in particular is stitched within the once tight grain and refined massing of the historic core of the town centre and adjacent to the LHA.
- 8.140 Overall, the massing of the development would be substantial and would result in some harm to the established local character and streetscape. It should be noted that the viability appraisal has demonstrated that this amount of development is required to make the benefits of the scheme deliverable, and the massing needs to be considered alongside detailed design, public realm and landscaping, and the provisions of the Tall Buildings Policy which are assessed below, before then making a decision based on the overall planning balance (set out in the final section of this report).

Character and Appearance

- 8.141 The applicant has developed a materials and detailing strategy within the design framework in the DAS (Design and Access Statement). This helps draw the different blocks together and establish a hierarchy of buildings. The two standout buildings are Block A given its prominent position on the High Street and Block D

due to its height. The other blocks should then be subservient and simpler in their appearance to ensure deference.

- 8.142 The strategy develops ideas about how the blocks respond to the varying conditions across the site i.e. responding to the craft and vernacular of the LHA on the High Street end, whilst carefully considering how the taller elements contribute distinctive architecture to the wider townscape.

Block A

- 8.143 The traditional suburban high street character of the area is tiled pitched roofs and shops fronts at ground floor, with either mock Tudor appearance (bricks at first floor and render with timber beams above, and Crittall windows) or Victorian (brick finish, window dressings and sash windows). The mock Tudor buildings within the existing shopping parades are predominantly quite heavy at lower levels with brick predominant (including brick piers to the shopfronts) and light at the upper floors, and generally quite playful in design.
- 8.144 The scale and mass of Block A makes it difficult to incorporate a pitched roof and it is noted that there are other flat roofed buildings along the High Street. The use of a flat roof, whilst not traditional, would not appear incongruous within the High Street setting.
- 8.145 Appropriately shopfronts would be provided along High Street and on to the square (the uses behind these are discussed in the layout section below). The applicant was encouraged to 'wrap around' the ground floor of Block A and Block B to incorporate the entire leisure centre frontage. The approach to this idea remains unclear as although the 'wrap around' is acknowledged in the DAS Addendum, the articulation of Block A's ground floor appears to have been developed in isolation of the leisure centre entrance (which remains indicative). Presently, the leisure centre façade lacks the fun and energy that you would associate with such a distinct facility. A whole placemaking and culture strategy is to be secured by condition that will need to encompass the entire frontage of the leisure centre.
- 8.146 Brick is proposed for most of the elevations other than metal cladding on the recessed sections of the top floor. The predominant use of brick is considered appropriate within the High Street context.
- 8.147 The darker tone to this building helps to differentiate Block A from Block B and begins to address comments in the DRP report (which noted the approach to materiality was too homogenous between Blocks A and B), by adding to a lack of relief between the connected massing.
- 8.148 Although the contrasting brickwork does visually break up the façade, it may appear overall relatively heavy. It is therefore important that an appropriate tone of brick is secured by condition. It is important to note that there are darker bricked buildings along the High Street including on the traditional mock-Tudor buildings.

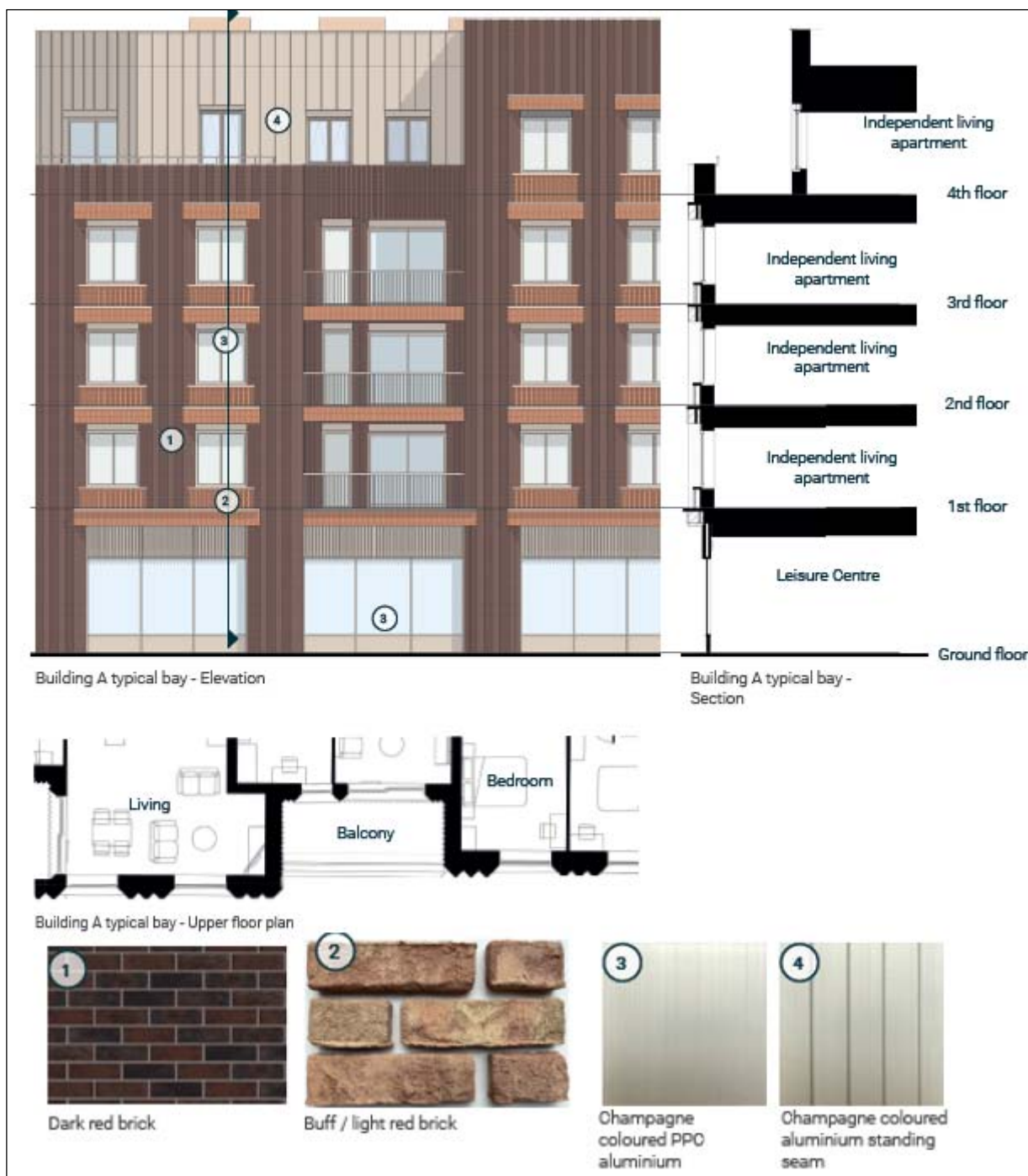


Figure 14 – Block A detailing

- 8.149 The champagne tone of the metal cladding and windows could appear particular stark against the darker brickwork. Further details of this should be secured by condition.
- 8.150 Overall, subject to further details to be secured by condition the design response is considered of a sufficiently high standard and Block A should be a positive addition to the High Street.

Block B

- 8.151 Preferably the design of Block B should ensure that it sits back / is subservient to both blocks A and D. The amended approach to the architectural expression has been simplified to move away from the previous 'layer cake appearance'
- 8.152 The elevation is broken-down into three components, the ground floor comprising the leisure centre is heavily glazed, the middle comprising the upper ground floors up to the sixth would feature red brick, pink concrete bands and red textured concrete beneath the windows, and the top recessed floor would feature champagne coloured metal cladding. All metal works including window frames and railings would be finished in champagne colour.
- 8.153 The tonality of the pre-cast horizontal bands contrasts relatively starkly with the brickwork. It would be preferable for these to be more tonally similar to ensure the architecture of Block B visually sits back in comparison with Blocks A and D. In addition, the pink tones of the pre-cast concrete appear to clash with the champagne metal cladding of the top tier setback. Samples must therefore be secured by condition to ensure a suitable blend and quality of materials.
- 8.154 The leisure centre entrance would be two storeys high and front onto the public space, providing an opportunity for an imposing and locally distinctive civic space. However, at this stage the detailed design of its frontage remains under-resolved. The applicant has explained an intention to carry out the detailed design of the leisure centre frontage as part of their placemaking strategy, to ensure that its position, with two sides fronting the square, is considered as part of the wider public realm strategy. Whilst more detail at planning application is preferable, officers are supportive of the intention to integrate the façade design with the overall public realm strategy as it will likely result in a more cohesive solution overall. Therefore, a condition is recommended to secure details of the appearance of this specific part of the building.
- 8.155 The signage of the leisure centre needs further refinement, and officers suggest a graphic designer is appointed as part of the placemaking and cultural strategy.
- 8.156 To ensure the development presents as an all-sided building, there was some focus on the view from Woburn Avenue. This elevation has evolved and does now present a degree of visual interest, although is relatively complex, particularly around the middle of the façade where various stepping occurs.

Block C

- 8.157 The elevations and materials are similar to Block B in appearance comprising red brick, pink concrete bands and red textured concrete beneath the windows and the recessed top floor featuring champagne coloured metal cladding. Appropriately, the composition of the elevation gives it a simple and consistent rhythm, and ensures it is deferential to Block D.

Block D

- 8.158 As the tallest block and a marker buildings there is greater emphasis for this block to be of a high-quality design. More intricate detailing and modelling have been incorporated into the façade. The horizontal concrete banding of Blocks B and C

remain but these appear to weave in and out of the vertical brick piers. The vertical piers would feature vertical lines of protruding bricks to add a further layer of texture to the elevations. This would result in a basketweave design, which as explained within the DAS would respond to a locally distinctive feature of the architecture within the town centre. The brick would be a slightly lighter buff brick to help differentiate the block from Blocks B and C.



Figure 15 – Block D articulation

- 8.159 Overall, it is considered that the design of the building is of a sufficiently high standard for its relatively important status within Purley Town Centre.
- 8.160 The blocks would sit within the relatively varied and evolving streetscape of Whytecliffe Road South and therefore have greater design freedom. The architectural approach to Block D works well when paired with Block C, and the appearance of the two would complement the varied character of the street.
- 8.161 The relationship with Block B is somewhat complicated. There is a concern that the lack of sufficient break between Block B and D, and the scale of Block B does negatively impact the slenderness and elegance of Block D as a tall building in the wider townscape, although it is noted that this would be mostly perceived within the site rather than affecting views of the site.
- 8.162 The materials for Blocks B-D are set out below. The lighter tone of the metal is considered to work well with the brickwork. However, there is some concern that other material colours may clash, notably the pink and yellow tones. Subject to further testing of the texture and tone, the general blend of materials is considered suitable.



Figure 16 – Materials and Blocks C and D

Layout, public realm and landscaping

Site Layout

- 8.163 Public realm is a key driver for the scheme. The provision of public space is highlighted in the Purley Regeneration Framework and is both expected and supported on this site.
- 8.164 Through the pre-app process various site configurations were explored, and the proposed siting of the buildings and square, and route through the site are considered the optimum layout for the site.



Figure 17 – Public realm layout

- 8.165 Block A continues the strong building line along the High Street and is suitably positioned so as not to project too far forward. Due to the need to increase the size of the leisure centre the commercial units fronting the High Street have been removed and replaced with a resident's lounge and leisure centre (gym). Unfortunately, the lounge is likely to offer only limited activity to the frontage. The leisure centre will offer some activity, and it is important that the gym uses within the High Street windows are conducive to an active and engaging frontage (secured as part of placemaking strategy). There also needs to be a clear relationship between the ground floor of Block A and the layout of the public square, providing space for external recreational activity directly adjacent to the gym inside.
- 8.166 The placement of active uses (restaurant, bistro etc) within Block B along the public route will ensure there is activity and passive surveillance along this elevation. However, it is worth noting that the level change across the route reduces the impact of this overlooking.
- 8.167 Blocks C and D continues the consistent building line along Whytecliffe Road South, with a small set-back to facilitate a wider pavement and landscaping.

Public Space

- 8.168 The proposed location and orientation of the leisure centre entrance fronting a public square that is directly adjacent to the High Street provides an appropriate setting for this important civic facility. The scale of the public space would be appropriate for the scale of the town centre, and would provide a useful and flexible space which can accommodate various activities whilst maintaining Purley's human scale environment. The placement of active frontage including the entrance to the leisure centre along the northern and eastern edges will positively activate the space, and the leisure centre has been amended to include a café which overspills into the square, providing activity and passive surveillance.

- 8.169 The proposed public realm design has also been amended. Whereas previously the layout felt rather corporate and lacking identity, the proposed concept is for the square to be 'a front room for Purley'. This is appropriate to the scale of Purley Town Centre and incorporates positive principles for communal and social activity.
- 8.170 The proposed public square measures approximately 540sq.m, in a rectangular shape, and fronts onto the high street. This potentially allows future activities to spill out onto the high street. The square is opposite the route to the Downlands Shopping Precinct creating a joined-up route through to Brighton Road. The square will have planting and benches and is laid out to ensure that there is a large open space in the middle to accommodate community activities.
- 8.171 The surface of the public realm would be a mix of grey granite and a blend of red clay pavers. Some of these would be arranged in a herringbone pattern and the different materials would be weaved together to create a 'carpet pattern'.

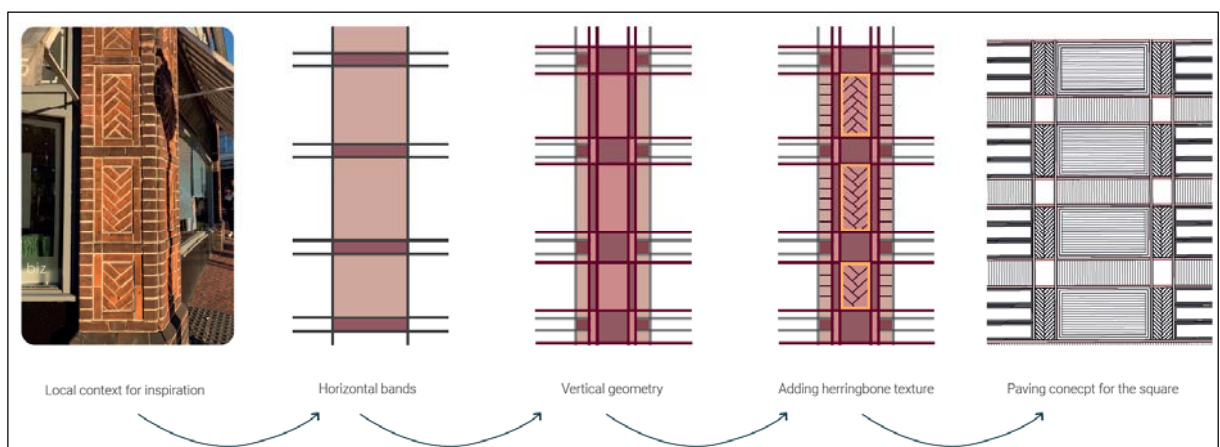


Figure 18 – Public square layout 'carpet pattern'

- 8.172 The amended material palette and detailing across the public realm is considered to positively respond to and take cues from the High Street public realm
- 8.173 The 'carpet' concept could be successful in marking spaces for different social activity, incorporating more intimate spaces and communal spaces for a range of ages and backgrounds. The layout and function of the square are still a work in progress and given the presence of the leisure centre it would be beneficial to incorporate opportunities for play and recreation to establish the square as a destination for leisure and recreation. Positively, opportunities for play would be integrated along the public route to the square.
- 8.174 The layout of furniture across each of the pocket spaces in the square requires further detail (as part of the placemaking and cultural strategy) to ensure the layouts are conducive to positive activity. Arrangement of seating should offer varied uses such as respite, interactions ('chatty benches'), and informal and playful seating for younger use. The spill out seating from the café has the potential to consistently animate the square if the café is suitably designed and manages to attract a customer base outside of leisure centre users. The public square is well orientated to receive good levels of sunlight throughout the year and relatively low levels of wind, and therefore would be a space conducive to sitting out in.
- 8.175 The DAS details different potential uses within the square including a market and cinema screening. Details for the activation, curation and year-round management

of events in the square, to ensure referenced uses are realistic and long-lasting should be secured within a management plan.

Public Art

- 8.176 Local Plan Policy DM14 requires all major developments to provide public art that enhances and creates local distinctiveness, reinforces a sense of place and responds to local character, makes a positive contribution to the public realm and engages the local community in its creation. Opportunities for public art include a curation wall along the south boundary wall of the square and within the paving. The identified locations have some rationale as they incorporate opportunities for wayfinding and gateway moments across the site. Further details of the exact locations and their content will need to be developed as part of the placemaking and cultural strategy. As will the signage and lighting across the site. These will need to be done in collaboration with a local artist and informed by public engagement.
- 8.177 There would be a generous pedestrian route from Whytecliffe Road South down to the square. The route should be apparent as you leave the station and reach the end of Station Approach. It would be framed by the proposed development and a linear strip of soft landscaping. Integrated within the strip of soft landscaping would be 35sq.m of 'play along the way' features that includes a mix of sensory and active equipment. This route would provide stepped access to both the existing footpath (where it dog-legs) and the public square.
- 8.178 An important driver in the layout was to ensure that there was a clear sightline between the start of the public route on Whytecliffe Road South to the public square. The submitted views show that Block A would be visible, but owing to the level changes of the site it is still difficult to have full sightlines from one end to another. It is important that clear wayfinding components are included in the placemaking and cultural strategy to draw people through the site. The route does have a gentle gradient down before meeting the steps to the square. This level change will create a slightly awkward relationship between those inside and outside the building walking along the public route.
- 8.179 The public route is generous and allows for a good level of landscaping and activity. The proposed playable interactions such as 'play-on-the-way' are supported and should be developed in the placemaking and cultural strategy to ensure it extends for as much of the public route possible and down into the public square. The final distribution of the planting will need to ensure that there are no hidden spaces that could pose a risk to public safety. This route should make for a pleasant way to navigate between Whytecliffe Road South and the High Street and represents a significant upgrade on the existing narrow lane ways.
- 8.180 The steps down from the public route would include integrated seating which is supported. The original steps had a continuous flow but have since been amended to include a blind bend, the suitability of this should be reviewed at condition stage. Due to the size of the change in levels it was proven difficult to have a step-free access route through the site. To compensate there would be a lift next to the steps allowing people who cannot navigate steps to access the square from the public route. In addition, the existing step-free footpath from Whytecliffe Road South to the High Street will remain. At the dog-leg of that existing route a set of steps will link to the public route allowing some inter-connectivity between the two routes and adding

some additional passive surveillance to that route. Concerns have been raised by TfL that the existing footpath is at risk of becoming less attractive as a route once the new link is available, and this could increase the risk of crime. A risk assessment (incorporating a women's risk assessment to discourage violence against women and girls in line with the Mayor of London's Planning for Equality and Diversity in London SPG) should be undertaken and any necessary upgrades secured within the legal agreement. Further information is also required in regard to elevations, the materiality and design approach of external walls facing onto the lower route which should be secured by condition.

- 8.181 The NPPF seeks developments that create places where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. The layout has been reviewed by the designing out crime officer who notes that there are potential crime risks with developments where there is access into the interior. They recommend a condition is attached requiring the scheme achieve secure by design accreditation. As part of any final landscape layout details of mitigation to manage the threat posed by malicious vehicles, notably to the public square and the public route, should be included.
- 8.182 Overall, the provision of a well landscaped and curated pedestrian through route from Whytecliffe Road South to High Street, the public square plus other highway improvements would transform the feel and give greater purpose and impetus to the town centre, which would be a considerable public benefit.

Heritage Impacts

- 8.183 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. With regard to conservation areas (at section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance. In this context, "preserving" means doing no harm.
- 8.184 The NPPF explains that any harm to a designated heritage asset, including from development within its setting requires "clear and convincing justification" with less than substantial harm weighed against the public benefits delivered by the proposed development. In relation to harm to non-designated heritage assets, the NPPF requires its significance to be taken into account and a balanced judgement to be reached having regard to the scale of any harm or loss and the significance of the heritage asset.
- 8.185 London Plan Policy D3 states development should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. It should incorporate the highest quality materials and design appropriate to its context. Policy HC1 requires development proposals affecting heritage assets and their setting to conserve their significance and the cumulative impacts of incremental change should be actively managed.
- 8.186 Local Plan Policy DM10 requires the siting, layout and form of new development to respect the character and appearance of existing areas. Local Plan Policy DM18

requires development to preserve and enhance the character, appearance and setting of heritage assets.

- 8.187 There are no heritage assets on the site, although the site is not within a Conservation Area or Local Heritage Area it is immediately adjacent to the Brighton Road LHA which includes most of the historic town centre of Purley. The area was designated in 1992 and forms a suburban centre with associated shops and amenities.
- 8.188 The architectural significance of the area is described in the summary document for LHAs as: 'The Brighton Road and High Street area in Purley represents a well-preserved collection of shopping parade buildings dating from between the late 19th and late 20th Century. The quality of architectural detailing and the variety of styles including Victorian Mock Tudor and Art Deco inspired features creates a parade of imposing buildings. The area is distinctive and retains the historic pattern of development.'
- 8.189 Nearby designated heritage assets include the Grade II listed Purley United Reform Church that is located to north of the site on the opposite side of Brighton Road, and the Webb Estate Conservation located approximately 500m to the west. Nearby non-designated heritage assets include several locally listed buildings (Purley Railway Station, 960 no. Brighton Road and nos. 1-13 High Street) and Brighton Road Local Heritage Area.

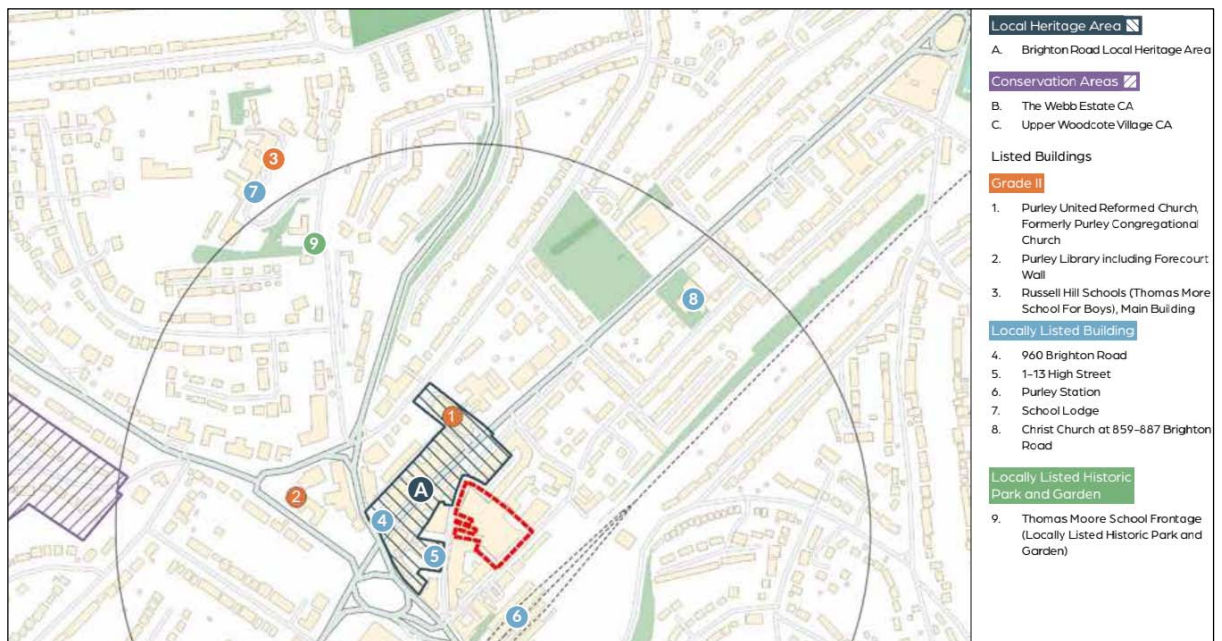


Figure 19 – Heritage assets map

- 8.190 The submitted Heritage, Townscape and Visual Impact contains townscape views and verified visual montages to understand the likely impact on the setting of heritage assets.
- 8.191 The proposed development would have no adverse impact or harm to the setting of listed buildings, or on conservation areas. Given the siting of the development relative to the Grade II Purley United Reformed Church, there is likely to be very limited near-views where they would be read together. There would potentially be some limited visibility of the development in wider setting views of the Purley United Reformed Church and other nearby listed buildings (Grade II Purley Library and

Grade II Russell Hills School) and from within the Webb Estate Conservation Area. However, these views would be at significant distance where the development would form a background element that would be read in the general context of the Purley skyline/development pattern, if not obscured by trees/buildings. Overall, the proposal would therefore not harm any designated heritage assets.

- 8.192 As discussed earlier, Block A is generally of a suitable siting, size and appearance and would complement the LHA. The biggest visual impact upon the LHA and the locally listed buildings within it is largely from the proposed taller buildings and this would be most pronounced from View no. 13 when looking north eastwards from outside the former Baptist Church development on Brighton Road. The mass of both the 10-storey and 12-storey elements would be prominently visible above the LHA and would detract from what is a fairly consistent roofscape across the LHA. The taller buildings would be visible in other views where it sits in context with the LHA notably, views nos. 8, 10 and 12, although these views are more glimpsed.
- 8.193 The proposal would sit in the background above the locally listed station when viewed from the southeast side of the station. It would rise quite prominently above the station and would clearly impact upon its setting. However, when read together with the proposed development at nos. 26-52 Whytecliffe Road South, the visual impact would be greatly reduced and not unduly harmful.
- 8.194 Overall, there would be some harm to non-designated heritage assets which must be weighed in the planning balance.
- 8.195 Archaeology is addressed in the archaeology section below.

Tall Building Policies

- 8.196 As detailed earlier in the report, there is potential for tall buildings in locations outside of specific designations, where they can meet the relevant criteria.
- 8.197 London Plan Policy D9 part C, as a detailed criteria for assessing tall buildings the covers visual impacts, functional impact, environmental impact and cumulative impacts.

Visual Impact

- 8.198 As detailed above there would be some harm to the skyline in both immediate and mid-range views. The tiering of the building heights upwards towards Whytecliffe Road South and the siting of the tallest element at the gateway to the public route is appropriate. Architectural quality is of a sufficient standard. Harm to heritage assets and their settings must have clear public benefits that outweigh that harm (see Conclusion and Planning Balance section of report). Glare is unlikely to be harmful and external lighting would be secured by condition.

Functional Impact

- 8.199 Subject to further detail of materials (secured by condition) and further fire safety scrutiny at Gateway Two, the proposal would ensure the safety of all occupants. Servicing, maintenance and building management arrangements would be secured condition. The location of routes and entrances is appropriate and should not lead to overcrowding or isolation. The area has sufficient capacity for the anticipated

impact upon facilities, services, walking and cycling networks, and public transport (subject to contribution towards local GP practices). The proposal appears to maximise the jobs, services, facilities and economic activity potential of the development. The building would unlikely interfere with aviation or navigation. The existing telecommunication equipment would need to be re-located, which will be for providers to manage. There may be some impact upon the solar panels on the roofs of nos. 51-61 Whytecliffe Road South and nos. 32-42 High Street, although given the relative siting and the placement of mass, it would not be to an excessive extent.

Environmental impact

- 8.200 Wind, daylight, sunlight penetration and temperature conditions around the development have been considered in relation to outdoor spaces. The development is set away from the main road, so should not experience a high-level of pollutants. The air movements around the development would not be significant and noise from plant would be considered at condition stage.

Cumulative impact

- 8.201 The cumulative impact with other developments has been considered and suitable mitigation measures to address the visual, functional and environmental impacts of the proposed development would be secured by condition and planning obligations.

Tall Building Policy Conclusion

- 8.202 In relation to Local Plan Policy DM15, the application site has a sufficiently high PTAL with direct public transport connections to the Croydon Opportunity Area. The design, whilst not exceptional, is of a sufficiently high quality. Block D would provide a highly distinctive local landmark as a gateway between the station and the public route to the town centre and would be acceptable. The bulkier (and more visually harmful) parts of Block B located within the middle of the site would be more visually harmful in longer views, and the overall proposed footprint and scale would not respond positively to nearby heritage assets, notably the adjacent LHA, although it should be noted that this and the affected locally listed buildings are non-designated heritage assets and the harm would be limited.
- 8.203 The proposal provides a significant amount of publicly accessible outdoor and indoor amenity space, and an active ground floor and inclusive public realm.
- 8.204 The proposal would partly comply with the criteria within London Plan Policy D9. Block D is generally compliant, with the visual harm in longer views (and harm to the non-designated heritage assets) resulting in Blocks B and C being only partially compliant.
- 8.205 Whilst the development would not be fully compliant with the London Plan tall buildings policy, in their response, the GLA note that the broad massing principles and height distribution across the site do not raise strategic concern, logically responding to typography and context. They will reach a final conclusion with regards to compliance with Part C of London Plan Policy D9, and as to whether a tall building could be considered to be acceptable when the application is assessed as a whole at the Mayor's Stage II consideration.

8.206 Overall, the proposal would cause some visual harm due to its scale and massing, although given that this harm is necessary to deliver the scheme's benefits this needs to be weighed in the overall planning balance. The functional, environmental and cumulative impacts would be generally acceptable with regard to London Plan Policy D9.

Quality of residential accommodation

8.207 London Plan policies D5 inclusive design, D6 housing quality and D7 accessible housing seek the highest standards of accommodation for future occupiers. The policies set out quantitative and qualitative standards, including minimum floor space and amenity standards for new builds in order to promote high quality living accommodation.

8.208 The below table shows the care units in the top row. The remainder of the units are the SOPH (extra care and independent living) units combined, both reviewed as residential for the purposes of this assessment.

Number of Units	Size (bedroom/person)	GIA (sqm) proposed	Min. GIA (sqm)	Best Practice GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. built in storage space (sqm)
40	Studio (care)	28-32	n/a	n/a	0	n/a	n/a	n/a
30	1b/1p	40.7-43.8	39	43	5.2-10.5	5	1.5+	1
80	1b/2p	50-58.9	50	55	5-8.1	5	2+	1.5
8	1b/2p	53.2-61.5	50	55	11.9-13.8	5	2+	1.5
3	1b/2p	54.8-61.2	50	55	47-50	5	2+	1.5
3	2b/3p	71.2	61	67	7.7	6	4	2
39	2b/4p	74.4-81.3	70	77	7.6-7.9	7	3.5+	2
3	2b/4p	77-79.6	70	77	17.5-52.5	7	3.5+	2
12	2b/4p	77-87.2	70	77	7-11	7	3.5+	2
1	2b/4p	88.4	70	77	37	7	6.2	2
1	3b/5p	95.6	86	97	14	8	4.3	2.5

Table 1: scheme considered against London Plan Policy D6 and Table 3.1

Unit and room sizes

8.209 Local Plan policies SP2.8 and D6 of the London Plan require new homes to be of high quality and achieve the minimum standards set out in the National Technical Standards (2015). This includes achieving ceiling heights of 2.5m.

8.210 All of the proposed residential units meet, and many exceed minimum floorspace standards, and a large number are over-sized and meet/exceed the Housing Design Standards (HDS) LPG best practice size.

8.211 The smallest proposed space standard for a 1-bed/2-person extra care unit is 57.7sq.m, which is consistent with the Housing LIN/PRP Architects Extra Care Housing Design Guide which suggests 54sq.m.

8.212 The smallest proposed space standard for a 2-bedroom independent living unit is 71sq.m, which exceeds the Housing LIN/PRP Architects Extra Care Housing Design Guide which suggests 68sq.m.

8.213 There is no set standard size for care units under planning legislation. However, Housing LIN note that National Minimum Standards for Care Homes for Older People has set levels at 12sq.m of usable space (excluding ensuite facilities) and 17sq.m of usable space (excluding ensuite facilities) for a wheelchair user. The proposed units measure at least 28sq.m so comfortably meet this requirement.

Amenity space

8.214 Policy DM10.4 requires 5sq.m of private amenity space per 1–2-person unit and an extra 1sq.m per extra occupant thereafter. It also stipulates that the minimum depth and width for all balconies and other private external spaces should be 1.5m. All the units achieve the minimum size and functionality.

8.215 Policies DM10.4 and DM10.5 of the Local Plan require all flatted developments to provide functional and high quality private and communal amenity space, in addition to child play space.

8.216 The proposals have several communal external amenity spaces.

Location	Size (sqm)
Courtyard	150
Winter gardens Block B (care only)	2 x 45
Roof Block B	630
Roof Block C	203
Roof link from Block A	80
Total	1,153

Table 2: Communal external amenity spaces

8.217 The largest space is a roof terrace over Block B that can be accessed from the cores in Blocks B and D. This terrace includes planting, landscaping, sensory garden for dementia care, kitchen garden/BBQ area, food growing areas, multiple seating areas, garden room and potting shed. The other terraces have landscaping and seating.

8.218 The applicant was encouraged to provide external amenity space at the lower floors for the IRC residents. The only area that this could potentially be provided was in the courtyard at the rear of Block B. However, the usability of this space for the residents will be somewhat limited as it is mostly occupied by access and servicing routes. Furthermore, this space is to the north of the development so would receive limited sunlight and therefore may not be attractive to use outside of summer months.

8.219 The occupants would also have access to internal amenities including restaurant, bar/bistro, spa, aquafit pool, changing facilities, fitness studio (gym), movement studio, village shop, meeting rooms, lounges, games room and multi-purpose craft studio. These would also be available for public use. Housing LIN note that these communal facilities are typical in relation to current good practice in the specialist older person's housing sector.

- 8.220 Given the age profile of the future residents (age 65+) it is not considered necessary for dedicated children's play space to be provided. It is noted however that some play space is proposed within the public realm, for the benefit of residents with visiting family and friends, and for the wider community.
- 8.221 The combined proposed private amenity spaces and the communal spaces are considered to provide a good amenity space provision for the future occupants.

Aspect, outlook, privacy, daylight and overheating for future occupants

- 8.222 Policy DM10.6 of the Local Plan requires developments to provide adequate sunlight and daylight to potential future occupants. Paragraph 6.81 of the Local Plan notes that designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight.
- 8.223 The London Plan states that developments should maximise the provision of dual aspect units, with single aspect units only provided where it is considered to be a more appropriate design solution in order to optimise capacity, and where it can be demonstrated they will have adequate passive ventilation, daylight, privacy and avoid overheating.

Aspect

- 8.224 The Housing Design Standards LPG explains that where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces; should not face north; and must demonstrate that the units will: have adequate passive ventilation, daylight and privacy; and not overheat.
- 8.225 Only 10% (4 of 40) of the care units are dual aspect. Furthermore, a high number of these single-aspect units are also northeast or north west facing. Given the small size of these units it makes it difficult to optimise the site capacity and achieve dual aspect. It should be noted that these units do benefit from large open internal communal circulation space.
- 8.226 Only 37% (67 of 180) of the SOPH units are dual aspect as defined in Mayor of London Housing Design Standards LPG. A number of these single-aspect units face north-east or north-west, although they all accommodate no more than two-bedspaces.
- 8.227 To improve the quality of environment for some of the extra care units they are centred around a large open hallway served by an atrium that brings light down to this space via a rooflight and a large side window. The 33 units (all single aspect) facing onto this space have a window which affords those properties an additional outlook and access to light.
- 8.228 Requiring a greater proportion of dual aspect units that meet the guidance would significantly reduce the number of homes that would be delivered (including corresponding number of affordable homes), likely reduce viability, which could decrease the overall percentage of affordable housing and potentially prevent the scheme being delivered.

Outlook

- 8.229 The majority of the units have good access to outlook with primary windows placed a reasonable distance from neighbouring development. That said, a high number of the units face into the 'U' shape created by Blocks C and D. This results in a constrained aspect when looking out towards at least one side direction from some of the units. It is therefore important that the courtyard is well landscaped to ensure that the direct views down offer some relief. Lastly the outlook from the second bedroom of 8 units within Block D facing the cut-out with Block B has a limited outlook of only 4.5m onto a blank wall, which would result in a poor living environment for these rooms. However, it is noted that this is the secondary bedroom to these units.

Privacy

- 8.230 All habitable rooms would have good levels of privacy. This is because they would be well separated from neighbouring properties and there are reasonable internal separation distances between the blocks themselves.

Daylight

- 8.231 To assess the interior daylight levels for the proposal the applicant has used Climate Based Daylight Modelling (CBDM) to determine average natural lighting conditions throughout the year. The BRE guidance supports this approach, and suggests using the UK National Annex for minimum illuminance recommendations. These are 100 lux in bedrooms, 150 lux in living rooms and 200 lux in kitchens, and are the median illuminances, to be exceeded over at least 50% of the assessment points in the room for at least half of the daylight hours. The applicant has undertaken the assessment both with and without the proposed development at nos. 26-52 Whytecliffe Road South.
- 8.232 The BRE guidance explains that these values are purely advisory, and different targets may be used based on the special requirements of the proposed development or its location.
- 8.233 The BRE states that "where a room has a shared use, the highest target should apply." However, they then go on to state that "Local authorities could use discretion here. For example, the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design." This approach is considered relevant in this instance as the applicant could otherwise create a non-habitable galley kitchen, which would ultimately reduce the overall quality of living environment. For the Living/Kitchen/Dining rooms LKDs the applicant has suggested using a target of 150 Lux rather than 200.
- 8.234 In total, 431 habitable rooms comprising 251 bedrooms, 151 living/kitchen/dining rooms (LKD's), and 29 studios were assessed.
- 8.235 When using the higher target of 200 lux for LKDs 359 of the 431 rooms assessed meet the minimum suggested levels. A further 16 rooms are slightly below the target achieving the required illuminance across between 40-50% of the floor area, with a further 23 rooms achieving it across 30-40% of the floor area. The remaining

33 (29 x LKD and 4 x bedrooms) would achieve the target illuminance across 0-30% of the floor area (when the target minimum is across 50% of the floor area).

- 8.236 With the reduced target of 150 lux, 15 of those 33 LKDs would achieve median lux levels of between 132.9-158.1, and a further 4 between 108.8-122.3. These levels are lower than the target but are not considered so poor as to offer unacceptable living conditions (given their compliance with space standards, provision of private amenity spaces, and additional communal facilities). There are however 14 LKDs with more concerning lighting levels, assessed as follows.
- 8.237 Two bedrooms (both secondary rooms within 2-bedroom flats) in Block D serving separate units stacked on top of each other would achieve only the target lux across 11.8% and 20% of the room and would have a median lux of 34.1 and 40.1. However, these are the second bedrooms to dual-aspect flats, which have well-lit LKDs and well-lit main bedrooms, and therefore the overall living conditions in those flats would be acceptable.
- 8.238 Two LKDs serving units stacked on each other would be hampered by overhanging balconies and the room depth. They would achieve only the target lux (200) across 1.8% and 11.6% of the room and would have a median lux of 49.8 and 89.9. These rooms serve one-bedroom southwest facing single-aspect flats where the bedroom has a good level of daylight. Given, this and that they are served by private balcony, the overall quality of living environment is satisfactory.

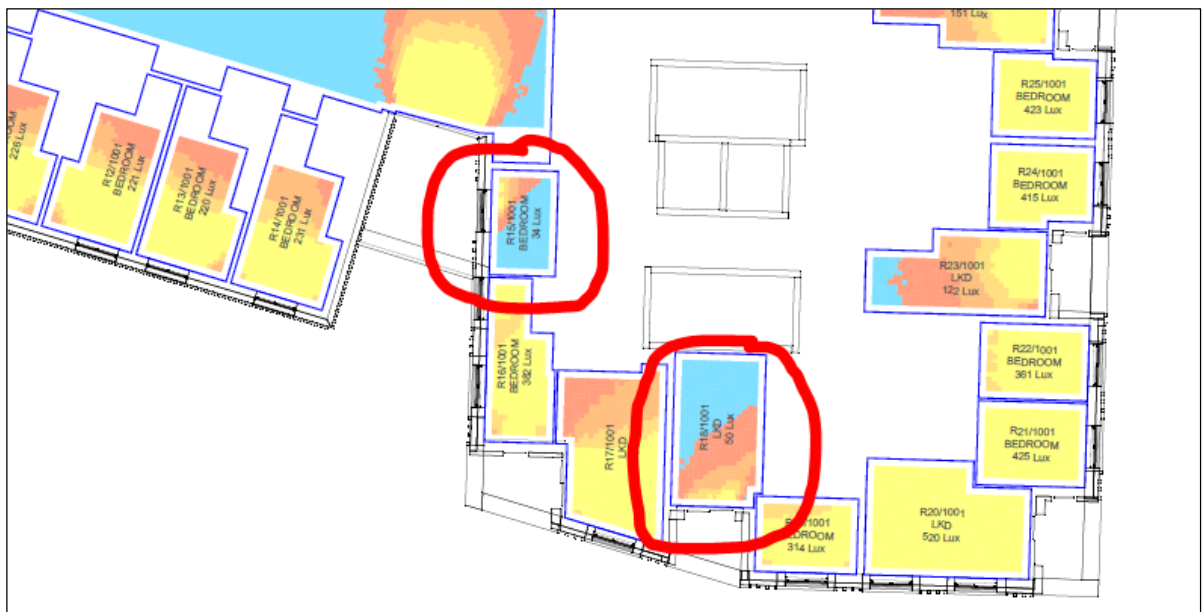


Figure 20 – Internal layout and poor daylight to Block D

- 8.239 Two units one-bedroom units within Block A would be hampered by overhanging balconies and the room depth. The LKDs would achieve only the target 200 lux across 17.7% and 28.1% of the rooms and would have a median lux of 94.1 and 133.2. The two bedrooms would achieve the target lux across 17.6% and 26.8% of the room and would have a median lux of 60.6 and 75.5. The levels of daylight would be reasonably low and the units single-aspect, they would also be west facing with an open-aspect and have private amenity space, which should ensure the overall quality of living environment is satisfactory.



Figure 21 – Internal layout and poor daylight to Block A.

8.240 The remaining seven rooms with poor daylight would be LKDs stacked upon each other in the 'internal junction between Blocks B and C (see image below). They would be hampered by the corner siting, overhanging balconies and the room depth. The median lux to these windows would be between 37.4-94.9 (they would achieve the target lux of 200 across just between 0-12.2% of the floor area when the minimum is 50%). The daylight to some of these rooms would be very low and they are unlikely to receive any sunlight. These rooms serve one-bedroom north-west facing single-aspect flats with outlook also partially constrained. These would therefore not achieve the relevant standards and would deliver lower living conditions than expected. This is to some extent mitigated by the fact that they are served by private balcony and are over-sized, with access to a range of communal indoor and outdoor spaces, however the quality of these units weighs against the proposal in the planning balance.



Figure 22 – Internal layout and daylight to 'armpit' of Blocks B and C.

Future Daylight Conditions

- 8.241 The development at nos. 26-52 Whytecliffe Road South, if built, would have a much greater impact on the daylight to the rooms facing Whytecliffe Road South than the existing row of houses opposite the site.
- 8.242 The applicant has tested the daylight to these rooms in this scenario. Daylight to some of the side windows to Blocks C and D would be slightly impacted. However, the daylight levels to some of the front facing windows would be greatly reduced. Thirty rooms would fail to achieve the target lux across 50% of the floor area and receive significantly less daylight than in the current situation, and all except one would be a studio or LKD. All of these rooms would be quite deep and overhung by balconies.

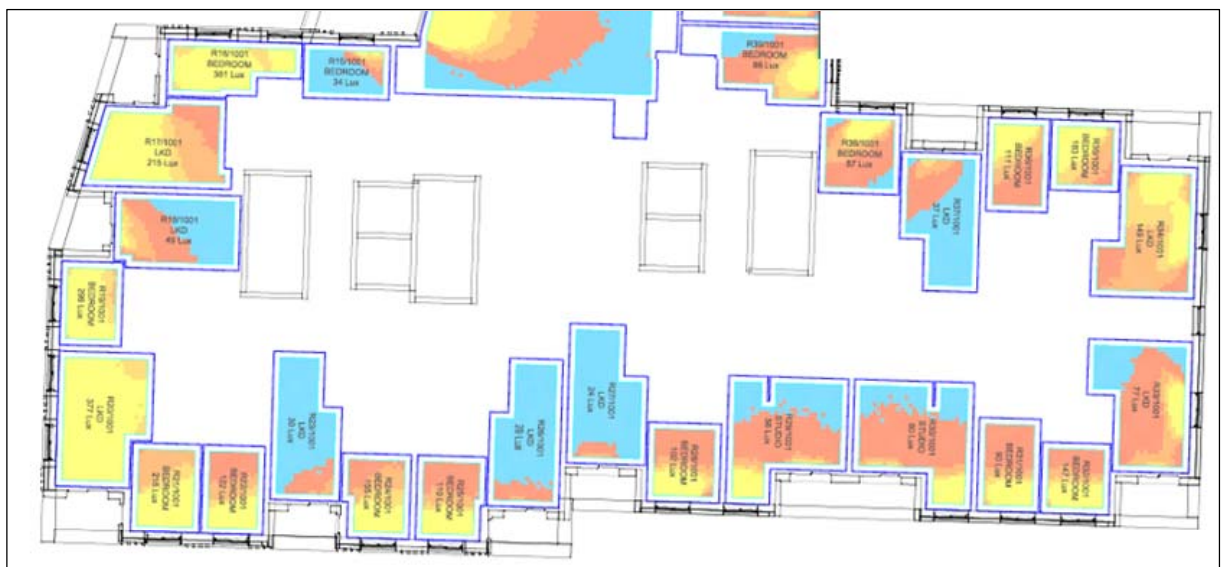


Figure 23 – Internal layout and poor daylight to Blocks C and D due to proposed development at nos. 26-52 Whytecliffe Road South.

- 8.243 Of these 4 would achieve the target lux across 40-50% of the floor area and 3 others (2 x studios and an LKD) across 30-40% of their area (although median lux would be reasonable lying between 138.9-166.9).
- 8.244 Of the remaining 23 rooms 5 would achieve the target lux across 20-30% of the room and would achieve a median lux of between 111-129.5. Another 5 would achieve the target lux across 10-20% of the room and would achieve a median lux of between 76.1-90.8. A further ten would achieve the target lux across 0.1-10% of the room and would achieve a median lux of between 32-58. Lastly three rooms (LKDs) would not achieve the target lux across any of their area and would achieve a median lux of between 23.5-29.9.
- 8.245 It is noted that all these rooms are constrained by overhanging balconies which in turn afford them private amenity space and they are southeast facing so will receive sunlight in the mornings. However, some of the daylight levels would be very low which would result in a gloomy internal environment in several rooms.

Internal Daylight summary

- 8.246 Whilst the majority of rooms would provide good access to daylight, the above assessment highlights that there are several instances where the access to daylight would be lower than the recommended targets, which need to be considered alongside other factors to determine whether the quality of accommodation would be acceptable. Given the site's urban location, and the emerging context, lower daylight levels may be acceptable when balanced against the benefits of living in a more urban environment, including access to the local shops and facilities, and transport links. Therefore, whilst officers are of the view that not all of the proposed accommodation would achieve the highest standards, the quality of the proposed accommodation should be balanced against the benefits of the development within the overall planning balance.

Communal Spaces

- 8.247 There are a number of shared communal spaces throughout the development. On the ground floor there are two lounges, games room and craft room. One lounge would achieve the target lux in both the current situation (100% of the floor area) and with the proposed development at no. 26-52 Whytecliffe Road South (50% of the floor area).
- 8.248 The other three spaces are side-by-side and face into the courtyard so have constrained access to daylight. They would each achieve a median lux in excess of 100 and the target lux over between 22.5-25.2% of the floor area. These would be slightly reduced by the proposed development at no. 26-52 Whytecliffe Road South.
- 8.249 The large communal areas on the care floors would suffer from poor daylight in the interior parts but those parts closer to the windows would have good levels of daylight.

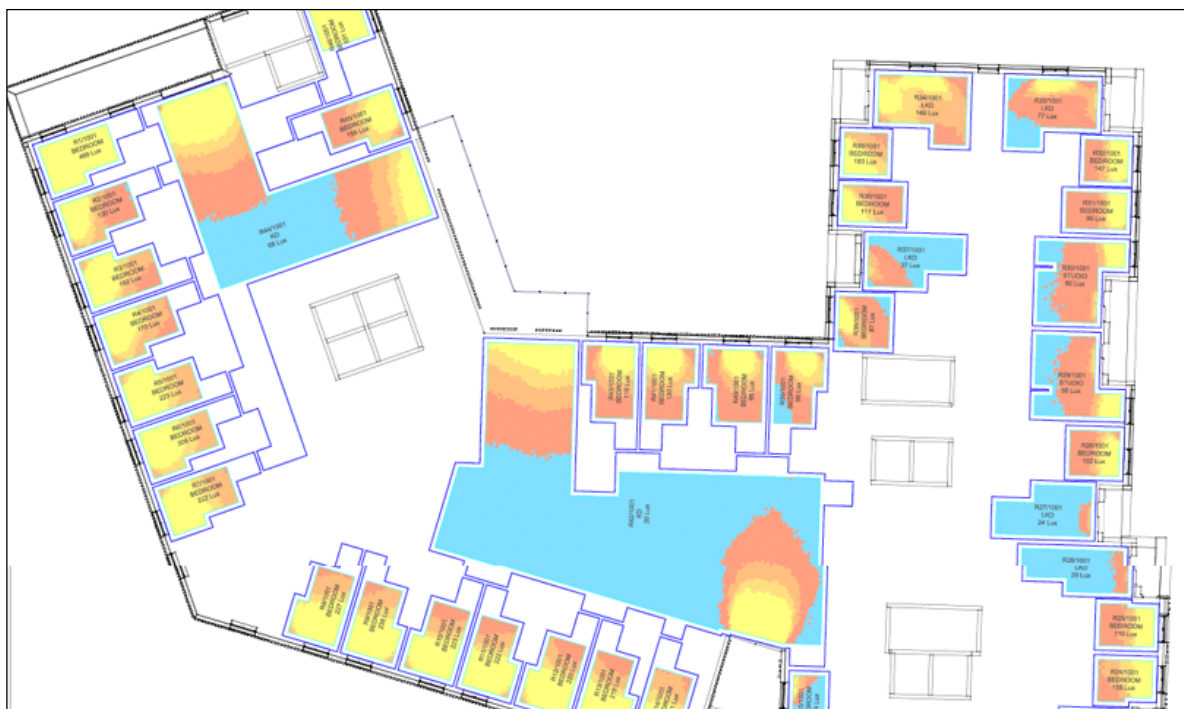


Figure 24 – Internal layout and daylight to communal spaces serving care units.

- 8.250 Three of the five lounges on each of the extra care floor would not meet the target 200 lux over 50% of the floor area. However, they would achieve a median lux of at least 139 and achieve the target lux over at least 34% of the floor area. These are large spaces, and it is expected that the areas deeper within the building would have reduced access to daylight; however, they would all have large areas of glazing and areas which provide access to daylight for residents. Given the size of the spaces the level of daylight is sufficient.

Overheating

- 8.251 London Plan Policy SI 4 requires developments to reduce potential overheating risk and reliance on air conditioning systems. It sets out a 'cooling hierarchy' that encourages minimising heat gains and passive ventilation through design and views active cooling as the last resort.
- 8.252 An overheating assessment was undertaken by the applicants that details how each stage of the cooling hierarchy has been considered. It notes that due to noise constraints passive ventilation cannot be used and as some rooms have been shown to have the potential to overheat additional cooling measures are required. The proposed design solution is to use a cooling module mounted on top of MVHR units to temper the incoming air when required.
- 8.253 The results of the Dynamic Overheating Analysis, using CIBSE TM54 methodology show that the units tested pass DSY1 with a tempered air-cooling approach. In the more severe scenarios (DSY2 and DSY3) there are a small number of relatively minor failures, whereby the rooms may overheat for a short periods. Therefore, further details of overheating mitigation measures for these rooms should be secured by condition.

Conclusion: Standard of Accommodation

- 8.254 The standard of accommodation should be considered as a whole. All the units have good access to privacy, sufficient private amenity space, a good level of communal amenity space, and mostly appreciably exceed the minimum internal unit sizes. Most units also have good outlook, although some units within Blocks B and C that look into the courtyard are somewhat constrained.
- 8.255 The BRE guidelines apply across the country, to developments in rural or suburban areas where greater access to daylight is usually expected, and to urban developments where greater density may result in reduced compliance. As noted above, they are advisory, and different values may also be acceptable. The proposed development is located within a town centre, and provides an urban scale of development. There would be a large number of homes, on a site where the surrounding buildings rise up to 6 storeys and consent exists for a 9-storey building opposite. The homes are generally designed with their main sitting areas and bedroom spaces closest to the windows, with large windows and private amenity spaces contributing to their overall living environments. Where substantial failures to meet the targets have been identified, the above assessment identifies that these generally affect the rear portions of deep LKD rooms; and it is further noted that the homes have been designed so that the main living spaces have the greatest access to daylight, with circulation, storage and bathroom spaces located in the areas without direct daylight access. The development also has access to several communal spaces where residents are expected to spend time.
- 8.256 There would be some significant shortfalls in the expected level of daylight to a number of the habitable rooms, although this is largely as a consequence of having a recessed balcony, which afford the occupants their own dedicated private amenity space. However, in addition, a number of those units (notably within the armpit of Blocks B and C) are also northerly facing single-aspect with little chance of receiving any direct sunlight.
- 8.257 Whilst some units, particularly on the lower levels, would experience a reduced standard of internal daylighting and aspect compared to the rest of the development, overall they would be part of a purpose built retirement community where homes would all comply with the relevant space standards, each home would have access to private and communal outdoor spaces, and a range of facilities would be available. Communal facilities are included which are intended to help tackle loneliness amongst older people, and the development's urban location, which offers a range of local facilities and transport links which will assist in combating isolation. As such, the significant shortfalls against the relevant standards would be somewhat mitigated by the overall offer of the IRC, which would temper the harm. However, the identified shortfalls should still be weighed in the planning balance.

Inclusion and Accessibility

HAPPI (Housing our Ageing Population Panel for Innovation)

- 8.258 The HAPPI principles are guidance for design for older people, based on 10 key design criteria:
- Space and flexibility

- Daylight in the home (and in shared spaces)
- Balconies and / or outdoor space
- Adaptability and 'care ready' design
- Positive use of circulation space
- Plants, trees, and the natural environment
- Energy efficiency and sustainable design
- Storage for belongings and bicycles
- (External shared surfaces and 'home zones' – for communal living)
- (Shared facilities and 'hubs' – for communal living)

- 8.259 The development has largely met these principles. In addition to what has been covered above, lightwells and windows provide natural light to some of the circulation spaces. The care home design seeks to avoid an 'institutional' feel, such as long corridors, by having 'clusters' of 10-11 rooms with a dedicated dining and living spaces. Adaptability and personalisation of the units for example front door niche, sliding partitions and assisted window opening would be incorporated. Provision has been made for both cycle storage and mobility scooter storage.
- 8.260 Housing LIN note that the design of the IRC component of the development is consistent with the HAPPI design principles and contemporary good practice in the specialist older person's housing sector.

Inclusive Access

- 8.261 The London Plan requires 10% of homes to be designed to be wheelchair accessible (units that are designed for wheelchair users to live in – Building Regulation requirement M4(3)) or easily adaptable for residents who are wheelchair users (Building Regulation requirement M4(2)).
- 8.262 A large number of units could achieve M4(3) by virtue of their size and layout, although 12 (10%) have been specifically identified on the plans. All other units appear capable of achieving M4(2). All entrances across the site will have level access. These levels of wheelchair use and adaptability should be secured by condition.

Noise

- 8.263 London Plan Policy D13, covers agent of change and puts the responsibility for mitigating impacts from existing noise generating uses (in this case noise from Purley Rail Depot) on the proposed noise-sensitive development.
- 8.264 The application is accompanied by a Noise Assessment which indicates that the internal noise conditions for future residents will be acceptable provided that appropriate noise mitigation measures are put in place in the form of appropriately specified façade elements (i.e. insulation, glazing and ventilation). The report outlines appropriate noise level limits for any fixed / mechanical plant and commercial operations that may be introduced as part of the development and that suitable conditions should be incorporated to ensure a commensurate level of protection for both existing receptors and those that would be introduced as part of the scheme. However, there is some concern regarding potential noise from the Purley Depot and therefore it is recommended that additional testing is undertaken

to ensure that there would be risk of undue noise to future occupants. Further detail should be secured by condition.

Impact on neighbouring residential amenity

8.265 Policy DM10.6 of the Croydon Local Plan states that The Council will support proposals for development that ensure that:

- The amenity of the occupiers of adjoining buildings are protected.
- They do not result in direct overlooking at close range or habitable rooms in main rear or private elevations.
- They do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling.
- They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

Daylight, sunlight and overshadowing

8.266 The applicant has submitted a sunlight and daylight study that tests the scheme against guidance contained with BRE Guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2022). The submitted report applies the Vertical Sky Component (VSC) test and No Sky Line (NSL) also known as Daylight Distribution test. It also applies the Average Sunlight Hours (APSH) and Average Winter Sunlight Hours (APSH) tests for sunlight to rooms and overshadowing test for sunlight to gardens and amenity spaces. The study has assessed the impacts upon 36 surrounding buildings.

8.267 The Vertical Sky Component (VSC) is an external daylighting calculation that measures the amount of direct daylight to a specific window point on the outside of a property. 27% VSC is a good level of daylight. If a window does not achieve 27% VSC in the proposed scenario and is reduced by less than 0.8 times its former value (i.e. the reduction is greater than 20%) then the diffuse daylighting of the existing area lit by the window would be likely to appear more gloomy, and electric lighting would be needed more of the time.

8.268 In terms of No-skyline (NSL)/Daylight Distribution, this measures the distribution of daylight on the 'working plane'. In a dwellinghouse, the working plane means a horizontal 'desktop' plane of 0.85m from floor level – the approximate height of a table or kitchen work surface. If a significant area of the working plane lies beyond the 'no sky line', then the distribution of daylight in the room would appear gloomy when compared to the rest of the room; irrespective of how bright it is outside. This is calculated by the BRE to amount to reductions of less than 0.8 times its former value (i.e. the reduction is greater than 20%), then supplementary electric lighting would be required if greater than 20%.

8.269 For houses this would include living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are less important. It should be noted that NSL tests can only be carried out if the layout of the room is known of which the window in question serves.

8.270 For the impact upon daylight the applicant has also undertaken additional analysis demonstrating the mass of a scheme where there would be negligible impact (in

relation to VSC) to neighbouring windows. They have also looked at a hypothetical 8-storey scheme across the site and also undertaken further analysis where the impact upon overhanging balconies and other similar features have been removed.

- 8.271 The London Plan Housing SPG notes that an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.
- 8.272 The site is brownfield, in a highly sustainable location within a town centre and with very good public transport links. In such locations policy directs high density development and therefore greater flexibility in daylight standards should be exercised.
- 8.273 Appendix F of the BRE guidance does recognise special requirements for setting alternative targets which respond to the existing nature and pattern of development surrounding a proposal. Appendix F provides an example where a mews or historic city centre would have been planned to achieve VSC targets of 18%. The site lies within what the London Plan considers an urban location where planning appeals in London have established retained VSC values between 15% to 20% may be seen as acceptable and a VSC in excess of 20% seen as reasonably good.
- 8.274 Additionally, Paragraph 2.2.13 of the BRE states that existing windows with balconies above them typically receive less daylight and that any modest obstruction opposite may result in a large relative impact on the VSC of this window. In order to address this, the BRE states that an additional calculation should be carried out that tests whether the presence of the balcony, rather than the size of the new obstruction, is the main factor in the relative loss of daylight.

Assessment

- 8.275 The submitted report assesses the changes in the daylight/sunlight when compared to the existing arrangement, as well as a comparison between the proposed and the emerging context including the 9-storey development at nos. 26-52 Whytecliff Road South (ref. 21/01753/FUL).
- 8.276 As mentioned above in this location VSC values between 15% to 20% may be seen as acceptable and a VSC in excess of 20% seen as reasonably good. The following properties have been identified to experience reductions in VSC or NSL, or both. If a property has not been identified below, then the retained levels of VSC are greater than 20% or overall losses are less than 20%, and NSL losses are less than 20%.
- 8.277 The following assessment explains the individual impacts on nearby buildings, followed by a summary of the overall impacts to be weighed in the planning balance.

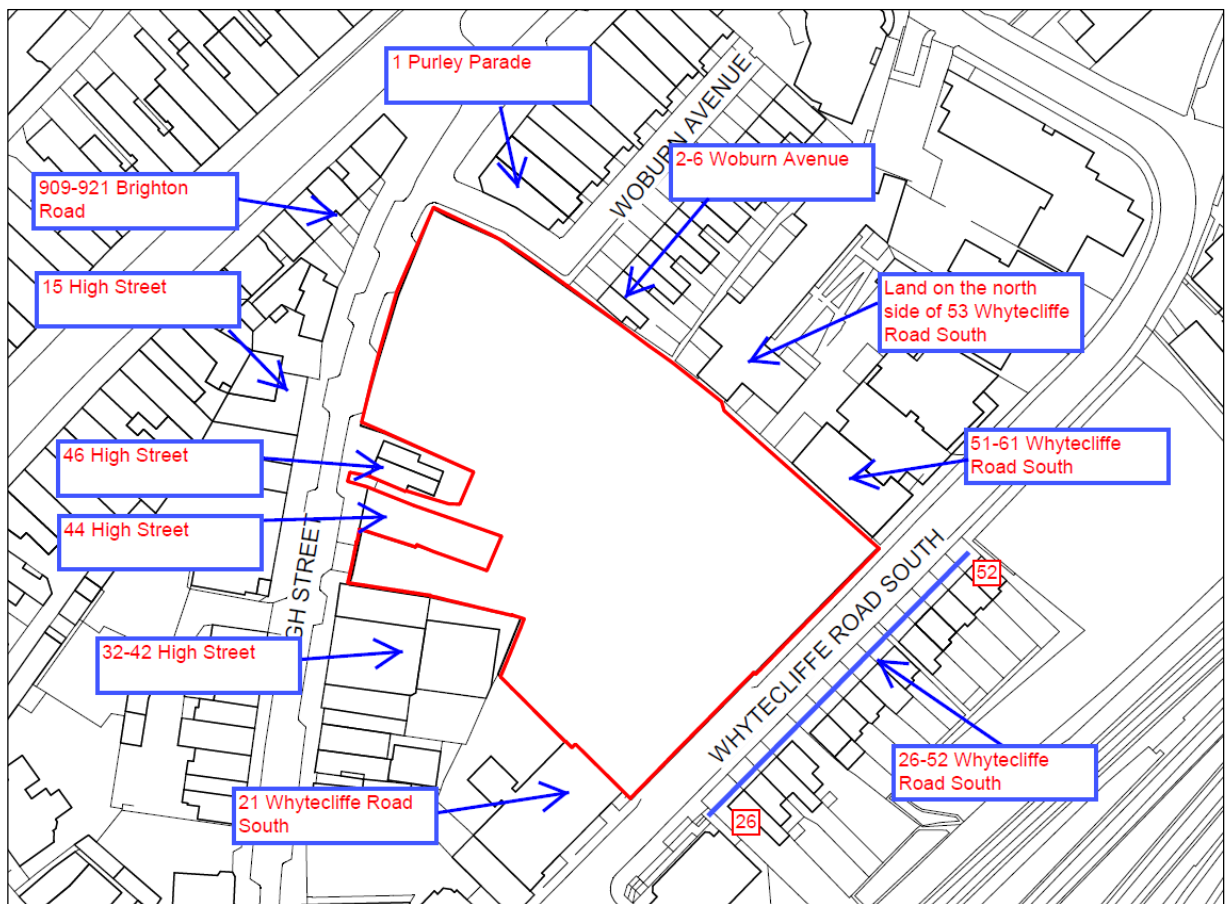


Figure 25 – Location of surrounding properties.

No. 15 High Street (Venture Lofts)

- 8.278 Three-storey block with commercial at ground floor and residential above, located to the west of the site on the opposite side of High Street.
- 8.279 15 windows would experience losses of VSC of just over 20% which are not considered significant. Seven rooms would experience losses in NSL of 20%-30% and five of between 30%-38.2%. Overall, these losses are not considered overly harmful given the context.
- 8.280 None of the tested rooms would fail the APSH test for sunlight.

Nos. 909-921 Brighton Road

- 8.281 Four-storey block with commercial at ground floor and residential above, located to the west of the site on the opposite side of High Street.
- 8.282 Two windows would experience losses in VSC of just over 20% which are not considered significant. One window would experience a 43% loss in VSC, although this window already has a very low existing VSC of 4.1. Furthermore, it serves a dual-aspect living room where the overall reduction in NSL is negligible. One room would experience a minor reduction in NSL of 21.6%. The losses of daylight are not considered overly harmful given the context.
- 8.283 None of the tested rooms would fail the APSH test for sunlight.

No. 1 Purley Parade

- 8.284 Three-storey block with commercial at ground floor and residential above, located to the north of the site on the opposite side of Woburn Avenue.
- 8.285 Six windows would experience a noticeable reduction in VSC, one with a minor breach of 25.7% and the other five by 40-48%. Three of the windows retain VSC levels above 15%, although the other two VSCs of between 7.33-13.84%. However, all the windows serve dual aspect rooms were the overall reduction in NSL is limited.
- 8.286 The NSL results show that none of rooms would experience a discernible loss of daylight. The losses of daylight are not considered overly harmful given the context.
- 8.287 None of the tested rooms would fail the APSH test for sunlight.

Nos. 2-6 Woburn Avenue

- 8.288 Two-storey terraced houses on the south east side of Woburn Avenue, located to the north east of the site.
- 8.289 Three windows would experience losses in VSC of no more than 22.5% which are not considered significant. A side facing window would experience a loss of 31%, which given its constrained location is not considered to be unduly harmful. Another would experience a loss of 62.5%, although it has an extremely low existing VSC of 0.16.
- 8.290 A kitchen would experience a loss in NSL of 22% and a living room a loss of 30.5%. The remaining rooms would not experience a noticeable loss in NSL. Overall, these losses of daylight are not considered overly harmful given the context.
- 8.291 Four rooms would fail the APSH test for sunlight. The main losses being winter losses of between 50-66.7%, annual losses are lesser (between 18.6-32.6%). Furthermore, all but one room (24%) would achieve annual APSH of above 25%, which is the level of APSH recommended by the BRE. The losses in sunlight are not considered to be unduly harmful.

Block on the north Side of 53 Whytecliffe Road South

- 8.292 Three-storey residential block to the rear of 53 Whytecliffe Road South, located to the northeast of the site.
- 8.293 There are seven flats that would be impacted by the proposal. Three on the ground floor, three on the first floor and one on the second floor. The layout of the first floor (the ground has the same layout) and location of the most affected windows are below.



Figure 26 – Location of impacted windows within block to the rear of 53 Whytecliffe Road South.

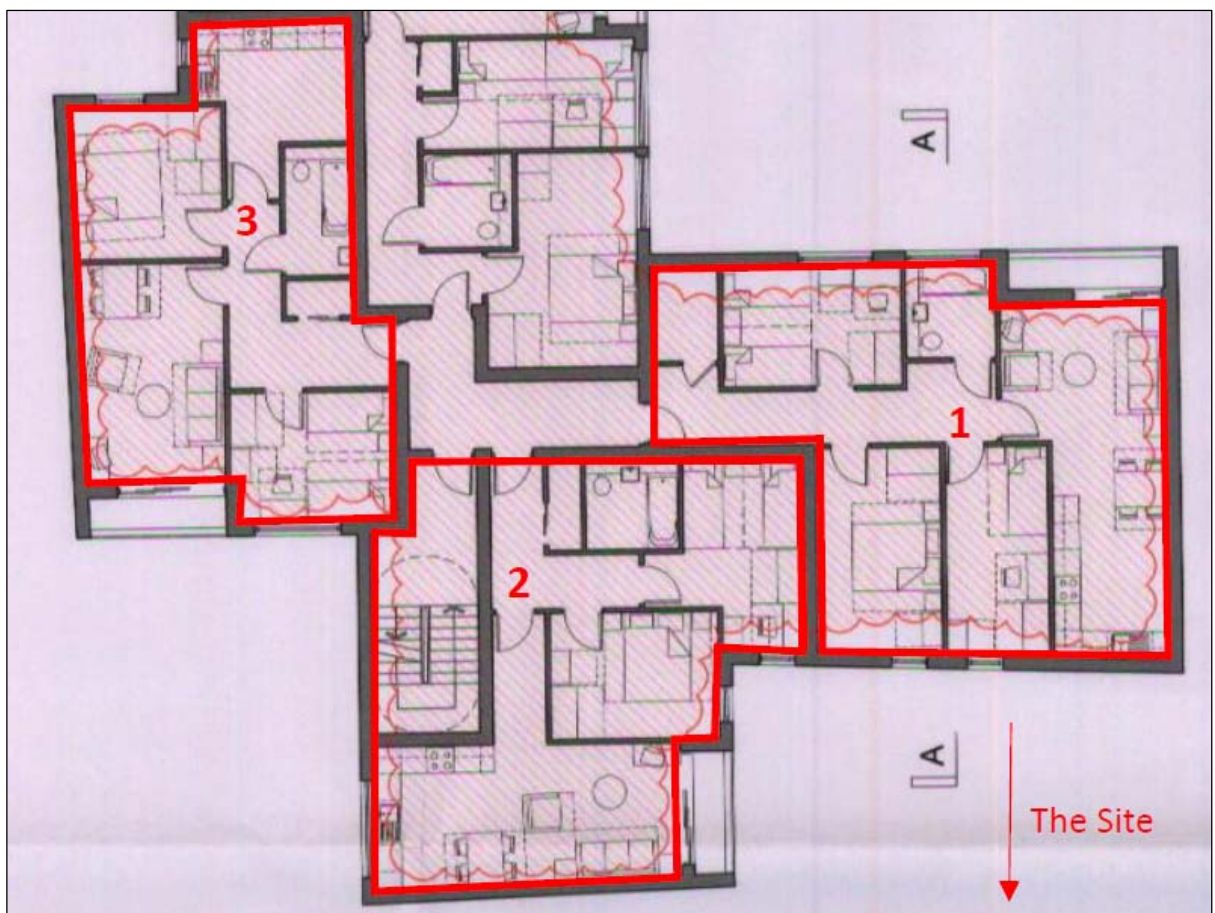


Figure 27 – Layout of impacted units within block to the rear of 53 Whytecliffe Road South.

8.294 The below table shows there are reductions in VSC to 14 windows greater than 20% and with a retained VSC of less than 20%. Of these, two windows would experience minor reductions of between 20-30%, with a further four windows

experiencing more significant reductions in VSC of 30-40%. Beyond these are major reductions with four windows experiencing reductions of 40-50% and another four windows reductions of over 50%.

VSC analysis

Room	Use	Window	ex VSC	pr VSC	Loss	%Loss
R1/320	LD	W2/320	14.3	9.62	4.68	32.73
R2/320	BEDROOM	W1/320	12.08	8.59	3.49	28.89
R4/320	BEDROOM	W5/320	12.02	8.16	3.86	32.11
R5/320	BEDROOM	W6/320	12.65	7.34	5.31	41.98
R6/320	BEDROOM	W7/320	16.75	9.16	7.59	45.31
R7/320	BEDROOM	W8/320	17.23	9.36	7.87	45.68
R1/321	LD	W1/321	8.62	3.19	5.43	62.99
R2/321	BEDROOM	W2/321	15.74	10.89	4.85	30.81
R3/321	LKD	W4/321	6.29	3.62	2.67	42.45
R4/321	BEDROOM	W5/321	20.02	15.21	4.81	24.03
R5/321	BEDROOM	W6/321	15.82	7.57	8.25	52.15
R6/321	BEDROOM	W8/321	20.12	9.11	11.01	54.72
R7/321	BEDROOM	W7/321	20.32	9.17	11.15	54.87
R1/322	BEDROOM	W1/322	21.44	14.92	6.52	30.41

Table 3: Losses of VSC to windows within block to the rear of 53 Whytecliffe Road South

- 8.295 Of these 8 windows, 6 serve bedrooms and two serve LD (living dining) and LKD (living/kitchen/dining). The LKD is dual aspect and the NSL analysis shows only a 0.5% reduction. The LD is overhung by a balcony and in the balcony-off analysis the loss would be 30% with a retained VSC of 14.7%.
- 8.296 The losses to the six bedroom windows would be significant and the retained levels of VSC low at between 7.34% to 9.36%.
- 8.297 The development at 103-111a High Street (in central Croydon) (LPA ref. 20/03841/FUL and appeal ref. APP/L5240/W/22/3296317), which was dismissed at appeal on daylight grounds, is a useful comparison. In that case there were rooms that also experienced reductions in VSC of more than 40% and retained levels less than 40%, that the Inspector found to result in significant harm to the living environment conditions. An important difference between the two cases is that those flats were single-aspect and therefore the majority of windows to each of those flats would have been detrimentally affected. Whereas, with this scheme the affected units are dual-aspect. In this case, four of the six worse affected windows serve 3-bedroom flats (2 bedrooms each) where the third bedroom and living room would be unaffected by the proposal. The other two windows each serve a two-bedroom flat where the LKD is dual-aspect and the losses in NSL to the LKDs are very minor.
- 8.298 Additionally, the applicant has undertaken some sensitivity analysis to demonstrate that due to the siting of these windows directly facing the site at close proximity, a significant amount of mass would have to be removed from the proposal to ensure that the windows remained in rigid compliance with BRE guidelines. In such cases, Appendix F of the BRE Guidance explains that where an existing building has

windows that are unusually close to the site boundary and taking more than their fair share of light, a lower target value could be accepted.

- 8.299 Overall, whilst, there are some mitigating circumstances, and the development (along with its benefits) would not be able to come forward without causing this harm, these losses are significant, resulting in harm and must be weighed in the planning balance.

NSL analysis

Room	Use	Size	Existing	Proposed	Loss	%Loss
R1/320	LD	201	73.4	49	24.5	33.4
R2/320	BEDROOM	112.2	78	60.8	17.2	22.1
R4/320	BEDROOM	113.9	74.1	52.1	22	29.7
R5/320	BEDROOM	125.1	41.2	17.4	23.8	57.8
R6/320	BEDROOM	124.2	57.3	29.7	27.6	48.2
R7/320	BEDROOM	109	39.1	19.3	19.8	50.6
R1/321	LD	177	80.4	45	35.4	44
R2/321	BEDROOM	112.2	109.7	73.8	36	32.8
R4/321	BEDROOM	113.9	82.8	62.5	20.3	24.5
R5/321	BEDROOM	125.1	22.3	5.5	16.9	75.8
R6/321	BEDROOM	136.9	31.2	7	24.2	77.6
R7/321	BEDROOM	113	25.4	7.3	18	70.9
R1/322	BEDROOM	160.8	90.2	55.2	35	38.8

Table 4: Losses of NSL to rooms within block to the rear of 53 Whytecliffe Road South

- 8.300 The NSL results largely reflect the VSC results, showing reductions of between 48.2%-77.6% for the same 6 bedrooms, which are major reductions in daylight. Again, these losses are significant, resulting in harm and must be weighed in the planning balance.
- 8.301 In addition, three bedrooms would experience minor losses (20-30%, two-bedrooms and a LD moderate losses (30-40%) and another LD a major loss of 44% (although this is impacted by the overhung balcony).
- 8.302 Three LKDs/LD would fail the APSH test for sunlight. The winter losses experienced would be 85.7%-100% and the annual losses to the three rooms are 52.2%-66.7% The retained APSH would be between 7-11%. The losses in sunlight are significant, resulting in harm and must be weighed in the planning balance.

Nos. 51-61 Whytecliffe Road South

- 8.303 Six-storey residential block on the west side of Whytecliffe Road South, located to the north east of the site. Six flats would be noticeably impacted by the proposal. These are all two-bedroom with the same layout and stacked from ground to fifth floor. The layout of the first floor and location of the most affected windows are below.



Figure 28 - Location of impacted windows within no. of 51 Whytecliffe Road South.



Figure 29 – Layout of impacted units within no. 51 Whytecliffe Road South.

8.304 The below table shows there are reductions in VSC to 12 windows greater than 20% and with a retained VSC of less than 20%. Given the existing height and siting of the car park all of these would experience major reductions of between 41.41-67.94%. Three windows would retain a VSC in excess of 15, seven a VSC in excess of 10 and two windows between 8.39-9.35%.

Room	Use	Window	ex VSC	pr VSC	Loss	%Loss
R2/300	BEDROOM	W4/300	19.15	11.22	7.93	41.41
R3/300	BEDROOM	W5/300	23.19	8.39	14.8	63.82
R2/301	BEDROOM	W3/301	28.58	12.19	16.39	57.35
R3/301	BEDROOM	W4/301	27.31	9.35	17.96	65.76
R2/302	BEDROOM	W2/302	33.66	13.87	19.79	58.79
R3/302	BEDROOM	W3/302	32.72	10.49	22.23	67.94
R2/303	ASSUMED BEDROOM	W2/303	37.41	15.03	22.38	59.82
R3/303	ASSUMED BEDROOM	W3/303	37.02	11.94	25.08	67.75
R2/304	ASSUMED BEDROOM	W2/304	39.01	16.72	22.29	57.14
R3/304	ASSUMED BEDROOM	W3/304	38.96	13.48	25.48	65.4
R2/305	ASSUMED BEDROOM	W2/305	39.42	18.05	21.37	54.21
R3/305	ASSUMED BEDROOM	W3/305	39.4	15.41	23.99	60.89

Table 5: Losses of VSC to windows within no. 51 Whytecliffe Road South

- 8.305 These reductions are very significant and would see a very noticeable reduction in daylight to these bedrooms.
- 8.306 It is important to note that the existing building at nos. 51-61 is poorly laid out with the affected windows being side-facing and only 1-2m from the boundary with the application site. These windows place a significant burden on the application site, when it is usually expected that habitable windows are placed on the front and rear elevations to avoid such scenarios.
- 8.307 Importantly the proposal has been set-away from the boundary by approximately 8.5m (increased since pre-application stage) to reduce the impact to these windows and therefore a not insignificant level of daylight to these windows would still be achieved.
- 8.308 As noted above Appendix F of the BRE Guidance explains that where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light, a lower target value could be used. An alternative approach that the BRE guidance supports is mirror-massing, where a building of the same height, size and equal distance away as the massing on a neighbouring site is used. In such a scenario the daylight to the affected windows would be diminished to extremely low levels of VSC for those on levels ground to third floor.
- 8.309 In the aforementioned appeal at 103-111a High Street there was a similar scenario whereby there were unneighbourly windows very close to the site boundary. In that instance, VSC levels were as low as 0% due to the proximity of the proposed building. The Inspector remarked that “whilst I acknowledge that the loss of light to a bedroom may not have the same impact as that of a LKD, there would nonetheless be an almost total loss of light to these rooms. This would significantly harm living conditions for the occupiers of these flats.”
- 8.310 Whilst the development would cause harm, the harm would be lower than that caused at 103-111a High Street by setting the development a reasonable distance off the boundary, where typically you would expect to build much closer to a neighbour’s flank.

8.311 Overall, whilst, there are some mitigating circumstances, these losses are significant, resulting in harm and must be weighed in the planning balance.

NSL analysis

Room	Use	Size	Existing	Proposed	Loss	%Loss
R3/300	BEDROOM	125.6	79	42	37	46.8
R3/301	BEDROOM	125.6	112.3	51.8	60.5	53.9
R2/30	BEDROOM	142.8	122.4	86.1	36.3	29.7
R2/302	BEDROOM	142.8	123.4	75.3	48.1	39
R3/302	BEDROOM	125.6	104.1	29.4	74.7	71.8
R2/303	ASSUMED BEDROOM	142.8	134.2	88.8	45.4	33.8
R3/303	ASSUMED BEDROOM	125.6	114.9	55.6	59.3	51.6
R2/304	ASSUMED BEDROOM	142.8	123.4	76.6	46.8	37.9
R3/304	ASSUMED BEDROOM	125.6	104.1	36.4	67.7	65
R2/305	ASSUMED BEDROOM	142.8	134.3	87.7	46.6	34.7
R3/305	ASSUMED BEDROOM	125.6	114.9	60.8	54.1	47.1

Table 6: Losses of NSL to rooms within no. 51 Whytecliffe Road South

8.312 The NSL analysis larger mirrors the VSC analysis with 10 rooms experiencing at least a 30% reduction in NSL of which 6 of those would be major reductions in excess of 40%, with the highest being a 71.8%. These losses are significant, resulting in harm and must be weighed in the planning balance.

8.313 The context around these reductions detailed in the VSC analysis above is also applicable for this test.

8.314 None of the tested rooms would fail the APSH test for sunlight.

Nos. 26-52 Whytecliffe Road South

8.315 Rows of two-storey terraced houses on the southeast side of Whytecliffe Road South, located to the south east of the site. It is noted that they face the existing car park which is relative low in height and ensures they presently experience high levels of daylight.

8.316 Importantly the planning committee has resolved to grant planning permission for these homes to be redeveloped as part of a wider scheme that includes the train station car park for a 9-storey residential development (ref. 21/01753/FUL). The impact to both the existing homes and the potential future homes will therefore be assessed.

Existing Houses - Nos. 26-52 Whytecliffe Road South

8.317 Ten windows would experience losses in VSC of no more than 20-30% which are not considered significant. Three windows would experience losses in VSC of between 30-40%, although these would retain a VSC of at least 20%.

8.318 Six windows would experience losses in VSC of between 40-50%, with these retaining a VSC of at least 15%.

- 8.319 Twenty windows would experience losses in VSC of between 50-68.7%. Of these five would retain a VSC of at least 15%, with the remaining 15 retaining a level between 10-15% VSC.
- 8.320 The NSL results similarly show quite large losses to the daylight of rooms (2 x 20-30%, 5 x 30-40%, 1 x 40-50%, 6 x 50-60%, 5 x 60-70% and 1 x 70.8% (although serves a box room).
- 8.321 It is important to note that the existing daylight levels to these rooms is high due to the low height of the car park, raised level of the houses and separation distance between the two. Furthermore, the rear windows/rooms to these properties would be unaffected and should retain high levels of daylight.
- 8.322 That said, these losses to VSC and NSL do result in some harm and must be weighed in the planning balance.
- 8.323 In terms of sunlight, none of the windows within this property are orientated to within 90 degrees of due south and no assessment is required as such.

Proposed development - (ref. 21/01753/FUL)

- 8.324 The planning committee resolved to grant planning permission for a 9-storey development with the s106 legal agreement presently being finalised. The development includes flats across part of the ground floor and then across all floors above. These are all single-aspect, although designed with bay windows to improve internal daylight levels.
- 8.325 To assess the interior daylight levels for this, yet unbuilt, scheme the applicant has used CBDM. As detailed earlier, the recommended levels are 100 lux in bedrooms, 150 lux in living rooms and 200 lux in kitchens, and these are the median illuminances, to be exceeded over at least 50% of the assessment points in the room for at least half of the daylight hours.
- 8.326 In total, following the proposed development, 80 rooms serving this development would not achieve the relevant lux target across at least 50% of the area. As approved it would only be 15. The table below shows the extent of these shortfalls:

% of area = Target Lux (Guidance min. = 50%)	No. of rooms
40-50%	13
30-40%	18
20-30%	25
10-20%	13
0-10%	10
Total	79

Table 7: Achieving lux target for windows within proposed development opposite.

- 8.327 Some of these can be seen as relatively modest shortfalls with 13 rooms achieving the lux target across 40-50% of the area and 18 rooms achieving the target across 30-40% of the rooms. However, there are also some very significant shortfalls, notably 13 rooms achieving the target over 10-20% of the room and 10 rooms achieving the target over less than 10% of the room.

8.328 This development has also been split into 4 blocks (A-D), which will be referred to the next section. Other than two bedrooms within Block C (achieving target lux only across 14.7% and 17.4% of the room), the worst achieving rooms are within Blocks A and B. The layout below shows how the rooms are affected. The top row is the quality of daylight with the car park in situ and the bottom row following the proposed development. The yellow areas show where at least 200 lux is achieved with the colour scaling down to blue where less than 50 lux is achieved.

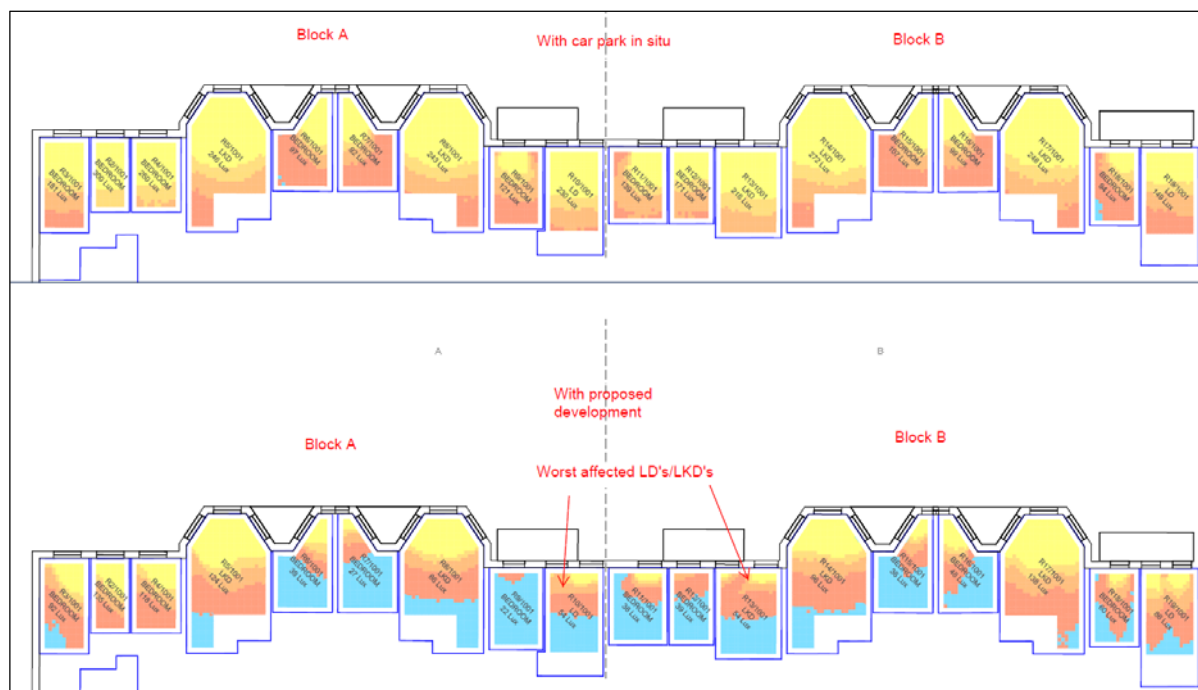


Figure 30 – Layout of impacted units within development at nos. 26-52 Whytecliffe Road South.

8.329 The siting of some of the windows next to the bays and the presence of overhanging balconies does contribute to the low levels of daylight to the worst affected rooms. As does the depth of the rooms.

8.330 Of the 23 worst affected rooms achieving the target lux across less than 20% of the room, 17 are bedrooms and 6 are (LDs or LKDs). As noted above these rooms are impacted by the overhanging balconies and depth of the rooms. Two LDs are stacked and four LKD's are stacked. The two affected LD's serve dual-aspect 3-bedrooms units, where one bedroom is front facing none of the area of the room achieves the minimum target lux, although there are also two rear bedrooms that would be unaffected. The four LKD's each serve 2-bedroom single-aspect units where both bedrooms are significantly impacted. The remaining bedrooms serve single-aspect units where the LKD's achieve target lux over at least 25% of the room area.

8.331 The applicant has undertaken an analysis of an alternative 8-storey development. Whilst not directly a mirror-mass, it is similar in scale to the application at nos. 26-52 Whytecliffe Road South and is also within the parameters of the heights specified within the Local Plan and site allocation.

% of area = Target Lux (Guidance min. = 50%)	Hypothetical 8-storey	Proposed	Current
40-50%	9	13	7
30-40%	14	18	7
20-30%	21	25	1
10-20%	20	13	0
0-10%	20	10	0
Total	84	79	15

Table 8: Achieving lux target for windows within proposed development opposite – hypothetical 8-storey development.

- 8.332 The hypothetical development would overall have a worse impact than the proposal. This is largely due to the proposal tapering down towards and then having a gap to nos. 51-61 Whytecliffe Road South.
- 8.333 The hypothetical development scenario demonstrates that were a similar scaled development to that at nos. 26-52 Whytecliffe Road South (also within the maximum height specified within local plan policy) to be constructed on this site then there would still be significant reductions to the proposal. Whilst this is a mitigating consideration, the reductions to the daylight to the potential future occupants of this development must be weighed in the planning balance.
- 8.334 In terms of sunlight, none of the windows within this property are orientated to within 90 degrees of due south and no assessment is required a such.

No. 21 Whytecliffe Road South

- 8.335 Up to six-storeys block of flats on the north west side of Whytecliffe Road South, located to the south west of the site.
- 8.336 Nineteen windows would experience losses of VSC of between 35-71% with retained VSC's also less than 15. Of these, three windows would have retained VSC's between 8.45-9.9%. However, eighteen of these windows are either small secondary windows or serve dual-aspect rooms where the NSL results show minor losses (all under 20% except one at 23.7%),
- 8.337 It is noted that a bedroom would experience a 57% loss and a retained VSC of 12.96%. However, it is does have an overhanging balcony which if removed (as suggested in BRE paragraph 2.2.13) would result in a 43.9% loss, but a retained VSC of 21.9%. In relation to NSL this room would experience a moderate loss of 33.1%. Overall, these losses of daylight are not considered overly harmful given the context.
- 8.338 In terms of sunlight, none of the windows within this property are orientated to within 90 degrees of due south and no assessment is required a such.

Nos. 32-42 High Street

- 8.339 Up to six-storeys block of flats on the south west side of Whytecliffe Road South, located to the west of the site.

- 8.340 In total thirty-six windows would experience reductions in VSC in excess of 20%. Thirteen windows would experience losses of VSC of between 20-30% which are not considered significant.
- 8.341 Twenty-three windows would experience losses in VSC ranging from 33.39%-83.48%. Of these, nineteen serve dual-aspect rooms where the NSL reductions are less than 20%, suggesting that the rooms themselves should still receive adequate daylight.
- 8.342 Three of the remaining four windows (reductions of 82.72%, 47.01% and 43.43% and retained VSC of 1.92%, 5.85% and 7.53% respectively) would have constrained access to daylight as they are overhung by balconies.
- 8.343 The applicant undertook a 'balconies-off' assessment which showed these reductions would reduce to 45.94%, 22.73% and 24.33%, with retained VSC's of 11.1%, 17.68% and 18.6% respectively. These results show that an LKD would still experience quite a significant loss (reduction 45.9% and retained 11.1%) even in the balcony-off scenario. Importantly the NSL results also show this room experiencing a 68.7% reduction (59.7% with balcony-off).
- 8.344 The remaining window, which serves an LKD would experience a 42.26% reduction and a retained VSC of 13.5%. The room would experience a 41% reduction in relation to NSL.
- 8.345 Overall, these two are the only rooms that would experience reductions in NSL in excess of 20%.
- 8.346 The losses of daylight, particularly to the two aforementioned LKD's are harmful and must be weighed in the planning balance.
- 8.347 Four rooms would experience a complete loss of their APSH, although the existing levels were already relatively low (between 10-13). These windows were already achieving 0 for the winter hours. One room would experience a moderate loss of 36.4% from 22% to 14% (its winter hours would remain unaffected). The proposal would be harmful in this respect, which must be weighed in the planning balance.

No. 48 High Street

- 8.348 This property would not be materially impact in relation to losses of daylight or sunlight.

No. 46 High Street

- 8.349 Two-storey building with commercial at ground floor and residential above, located to the south and west of the site on the same side of the High Street.
- 8.350 Two rear windows facing into the side return would experience reductions of 39.44% and 43.95% with retained VSC's of 5.36% and 8.11%. They would also experience reductions in their NSL of 45.5% and 52.35 respectively. Whilst the reductions are significant and should be weighed against the proposal the position of the windows in a very constrained location with low existing daylight levels is a mitigating factor.

- 8.351 Two rooms would experience losses of between 50% and 62.5% in APSH (with the retained levels between 6%-12%). These windows would experience complete loss of winter APSH although these were already achieving low levels (2% and 3%). One room would experience a minor loss of 20.7% (23% retained) and a winter loss of 40%, although from an already low level of 5%. The proposal would be harmful in this respect, which must be weighed in the planning balance.

No. 44 High Street

- 8.352 Three-storey building with commercial at ground floor and residential above, located to the south and west of the site on the same side of the High Street.
- 8.353 Four windows would experience losses in VSC of between 34.67%-38.99% which are fairly significant losses. However, they would all retain a VSC of at least 15% which should ensure adequate levels of daylight for the VSC test. The NSL results for four rooms shows that they would experience losses between 51.4%-59.3% which would be moderately harmful and should be weighed in the planning balance.
- 8.354 One room would experience a moderate loss of 37.8% from 37% to 23% (and its winter hours would reduce from 4% to 3%). The room would only be 2% below the 25% threshold and therefore the loss would not be unduly harmful.

Nos. 24 High Street

- 8.355 Two-storey building with commercial at ground floor and residential above, located to the south and west of the site on the same side of the High Street.
- 8.356 One room would experience a loss in NSL of 37.1%, although the VSC loss would be only 10.09%. This moderate loss must be weighed in the planning balance.
- 8.357 None of the tested rooms would fail the APSH test for sunlight.

Overshadowing of Gardens

- 8.358 Ten gardens lying to the north of the site were tested for BRE compliance in terms of sunlight hours. These properties gardens are identified on green in the plan below (2-12 Woburn Avenue and Block on the north Side of 53 Whytecliffe Road South).

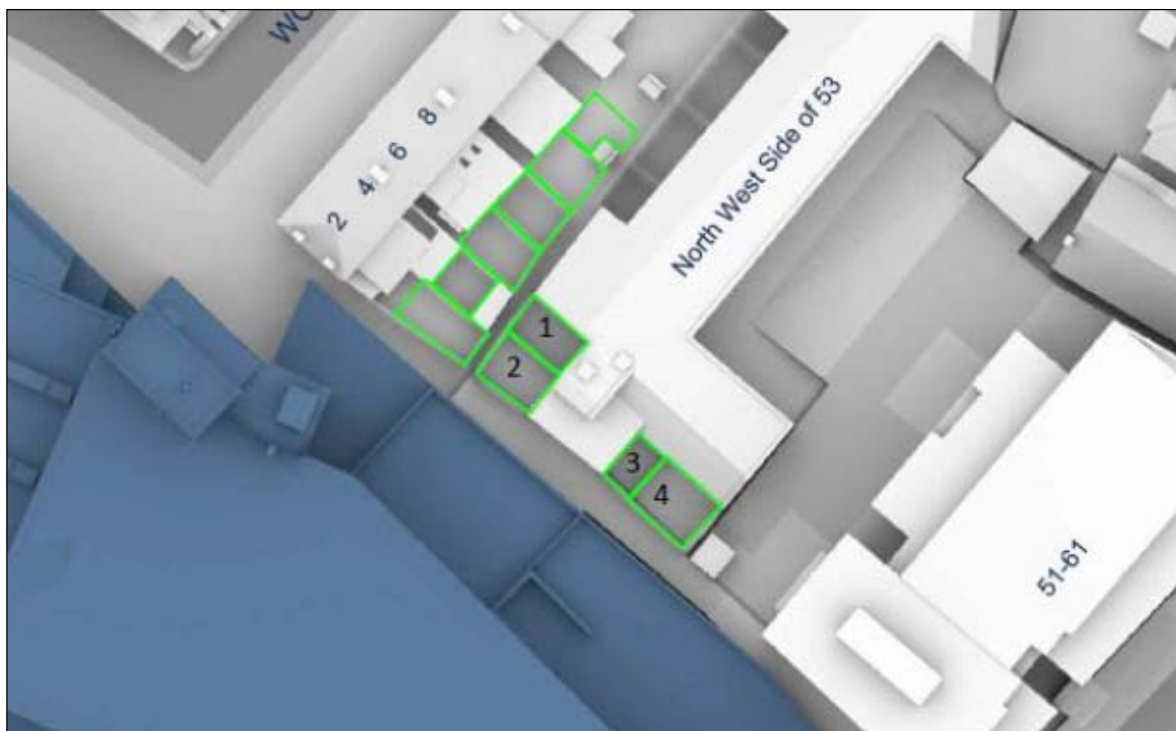


Figure 31 – location of impacted gardens within Woburn Avenue and block to the rear of 53 Whytecliffe Road South.

- 8.359 Three of these gardens serving flats in the block on the north side of no. 53 Whytecliffe Road South already fail to achieve any of the requisite sunlight on any of their areas, therefore the proposal would not unduly worsen the overshadowing in this scenario. One garden presently achieves the hours over just 3% of its area and this would be completely lost following the proposal.
- 8.360 Six gardens serving nos. 2-12 Woburn Avenue would experience significant reductions of which only no. 12 would retain a BRE compliant level of sunlight. It should be noted that none of the gardens achieve the 2 hours of sunlight over 50% of the garden on 21st March. That said two gardens would experience a total reduction (from 20% and 23% to 0%). Two other gardens would experience reductions of 56.6% and 58.7%, with another a 32% reduction. These losses are harmful and must be weighed in the planning balance, although it should be noted that in the height of summer all but two of these spaces would achieve at least 2 hours of sunlight over at least 50% of the garden area (Woburn Avenue properties at least 79%).

Daylight and Overshadowing Impacts conclusion

- 8.361 The proposed development would result in some harm to the surrounding properties, in varying degrees. Within an existing urban environment, some harm to surrounding daylight is almost inevitable, but planning decisions should seek to minimise the harm caused.
- 8.362 It is understood that the quantum of development proposed is required in order to deliver the scheme's benefits without compromising financial viability, and therefore, if the scheme is to be delivered, that harm caused is necessary and thus intrinsically linked with those benefits.

- 8.363 The site is within a town centre and allocated for redevelopment so therefore you could reasonably expect some losses of daylight beyond BRE guidelines. Since the pre-application stage, the massing has improved, with daylight improved accordingly, especially for the closest existing residents. Its massing has been designed to follow the contours of the land, and the site already contains a significant amount of development which means that its immediate neighbours exist within a compromised urban setting. To some extent, the replacement of the unattractive existing buildings and replacement with a new development with high quality facing materials, improved passive surveillance, and public realm, will improve the wider environment in which they exist.
- 8.364 There would be significant losses of daylight to neighbouring occupiers as well as the potential development on the site opposite, which are beyond the normally accepted levels of harm. The amount of harm is however commensurate with the size of the building, and there would also be significant impacts which need to be weighted into the planning balance section at the end of this report.

Outlook and privacy

- 8.365 The planning system cannot protect specific views from private properties but can consider whether a proposed development is intrusive or overbearing to the outlook of a property, particularly residential properties, due to the massing and proximity of a proposal, and whether this would cause demonstrable harm to the amenity of that property.
- 8.366 The London Housing SPG under Standard 28 (Privacy) notes that 'in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes'. It says that 'these are still useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density'.

No. 15 High Street (Venture Lofts)

- 8.367 Three-storey block with commercial at ground floor and residential above, located to the west of the site on the opposite side of High Street.
- 8.368 Block A would be at least 20m from the nearest front window of this building in a cross-street relationship and at an angled view, and therefore would not result in a significant loss of outlook or privacy to the occupants of this building.

Nos. 909-921 Brighton Road

- 8.369 Four-storey block with commercial at ground floor and residential above, located to the west of the site on the opposite side of High Street.
- 8.370 Block A would be approximately 18m from the nearest rear window of this building in a cross-street relationship, and therefore would not result in a significant loss of outlook or privacy to the occupants of this building.

No. 1 Purley Parade

- 8.371 Three-storey block with commercial at ground floor and residential above, located to the north of the site on the opposite side of Woburn Avenue.
- 8.372 Block A would be approximately 10.8m from the nearest side window of this building in a cross-street relationship. Whilst these side windows would experience some loss of outlook and privacy, it is noted that these windows are all either secondary or serve non-habitable rooms and therefore these losses are considered acceptable.
- 8.373 Block B would be at least 24m from the nearest rear window of this building in a cross-street relationship and at an angled view, and therefore would not result in a significant loss of outlook or privacy to the occupants of this building.

Nos. 2-6 Woburn Avenue

- 8.374 Two-storey terraced house on the south east side of Woburn Avenue, located to the north east of the site.
- 8.375 Block A would be over 14m from the nearest front window of this building and sited at an angle to it. These windows would experience some loss of outlook and privacy, although given their relative positioning, not to an unacceptable extent.
- 8.376 Block B would be visible from the rear windows and gardens of the Woburn Avenue properties as it would be positioned along their southern flank. The mass of Block B has been broken-up along this section in part to avoid it appearing too overbearing upon these properties (and the block on the north Side of 53 Whytecliffe Road South).
- 8.377 The existing building is between approximately 2m-2.9m (tapering) from no. 2's rear boundary at ground floor level and it runs the length of their garden (former supermarket). At the end of their garden (southern corner), the building appears as two-storeys with a railing on top and is only 2.9m away. Beyond this the car park would appear as 5-storeys plus parapet around 13.3m away.
- 8.378 By comparison the proposed leisure centre (effectively two-storeys) would be between approximately 2.6m-3.5m (tapering) from no. 2's rear boundary at ground floor level and it runs the length of their garden. There is therefore some improvement in terms of separation distance. However, it would effectively be a storey taller. In addition, there would be a further third storey along the flank that would be between 4.9m-7m from their boundary. Above this there is further mass that tapers away from the boundary as it rises (see below).



Figure 32 – Massing of north elevation of development.

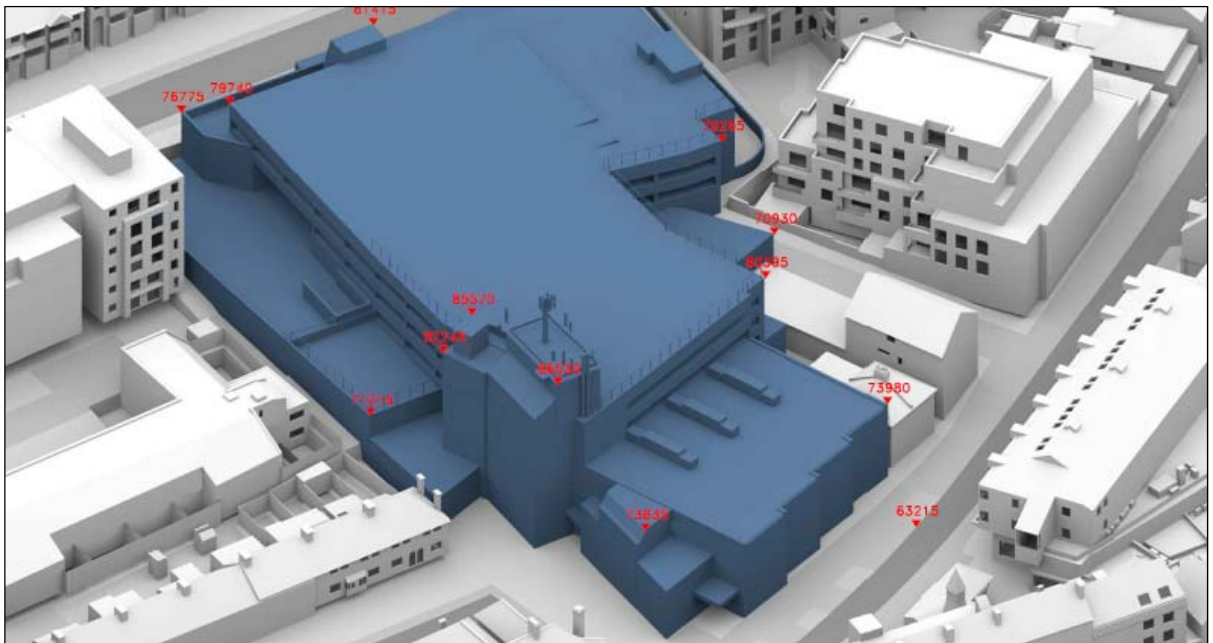


Figure 33 – Existing massing of site.

- 8.379 The proposal would clearly increase the mass quite considerably towards the south of no. 2 and the other properties along Woburn Avenue, although it would be at an angle rather than directly ahead of their rear windows. Overall, the loss of outlook and additional overbearing presence adjacent to no. 2 must be weighed in the planning balance.
- 8.380 There are side windows within the flank of Block B that are either secondary or serve non-habitable spaces and therefore a condition should be attached requiring these to be obscure glazed. Otherwise, there would be no privacy concerns.
- 8.381 Block on the north Side of 53 Whytecliffe Road South
- 8.382 Three-storey residential block to the rear of 53 Whytecliffe Road South, located to the north east of the site.
- 8.383 Presently eight bedrooms and two LD's face onto a two-storey wall at least 8.3m away with the gardens almost abutting the two-storey wall.

- 8.384 Block B would also present a two-storey wall in a similar position. There would also be significant additional mass beyond the initial two-storey wall that would impact the outlook, notably from the one sited on the north west end of the elevation that would partially look directly on to the 10-storey mass of Block B. This impact upon outlook must be weighed in the planning balance.
- 8.385 The balconies within Block B are approximately 18m from the nearest windows facing towards the development. The fence to the rear courtyard should be at least 1.7m high to avoid overlooking towards these properties. Otherwise, there would be no privacy concerns.

Nos. 51-61 Whytecliffe Road South

- 8.386 Six-storey residential block on the west side of Whytecliffe Road South, located to the north east of the site. Six flats would be noticeably impacted by the proposal. These are two-bedroom with the same layout and stacked from ground to fifth floor.
- 8.387 Block C would be positioned 9.8m from the side windows of this property at 7-storeys with a 2-storeys above set-in a further 3.45m. Importantly, nos. 51-61 is only between 0.7m-1.2m from the shared boundary, therefore relying on the application site to provide adequate outlook. The outlook to these rooms would be foreshortened, particularly the upper floor windows that presently experience a clear open outlook across the car park. However, it is considered a reasonable balance has been achieved between ensuring that these windows (all serving bedrooms) have some outlook (albeit looking onto the flank of Block C) and not unduly constraining the development potential of the site, noting that the site has been formally allocated for redevelopment within the Local Plan.
- 8.388 Floors 1-6 have secondary side facing windows that should be conditioned to be obscure glazed to avoid mutual overlooking. The sides of the balconies would also require screening to avoid overlooking, which should be secured by condition. The seventh floor has a terraced area, although given the angle to down to nos. 51-61 side windows, it is not considered that this would result in any significant overlooking.

Nos. 26-52 Whytecliffe Road South

- 8.389 Rows of two-storey terraced houses on the southeast side of Whytecliffe Road South, located to the south east of the site. It is noted that they face the existing car park which is relatively low in height and ensures they presently experience high levels of daylight.
- 8.390 Importantly the planning committee has resolved to grant planning permission for these homes to be redeveloped as part of a wider scheme that includes the train station car park for a 9-storey residential development (ref. 21/01753/FUL). The impact to both the existing homes and the potential future homes will therefore be assessed.
- 8.391 The establishment of a street frontage, with the proposed windows set between 18.5m-22m from the windows of the existing buildings on the opposite side of Whytecliffe Road South and 18.5m-20.5m from the proposal opposite (ref. 21/01753/FUL) is considered a typical across-street relationship in a town centre

context and would not result in a significant loss of outlook or privacy to the occupants of these buildings.

No. 21 Whytecliffe Road South

- 8.392 Up to six-storeys block of flats on the north west side of Whytecliffe Road South, located to the south west of the site.
- 8.393 Block D would be positioned 10.8m from the side windows of this property at 12-storeys.
- 8.394 Floors 1-3 of no. 21 Whytecliffe Road South have side facing windows that are secondary windows or serve non-habitable spaces and appear to all be obscure. Therefore, there would not be a loss of outlook or privacy to these flats.
- 8.395 Floor 4 has two units which would have primary windows serving living rooms facing Block D and associated terrace areas. The window-to-window separation distance would be approximately 18m which would ensure a sufficient degree of outlook and privacy. The distance to the edge of the terrace would be approximately 15.7m which would provide a sufficient degree of privacy for these amenity spaces.

Nos. 32-42 High Street

- 8.396 Up to six-storeys block of flats on the south west side of Whytecliffe Road South, located to the west of the site.
- 8.397 There would be a separation distance from the windows and balconies of Blocks B and D of at least 18m to the windows serving within nos. 32-42 High Street. This should ensure that these units retain a reasonable level of outlook and privacy.

No. 46 and 48 High Street

- 8.398 Two-storey building with commercial at ground floor and residential above, located to the south and west of the site on the same side of the High Street.
- 8.399 Presently they have the three-storey flank of the existing leisure centre to their north and the car park to the rear. The proposed development should improve the outlook from these properties.
- 8.400 There would be a separation distance from the windows and balconies of Block B of approx. 14-15m to the nearest rear windows, although these are obscure glazed. The distances to the other windows serving nos. 46-48 High Street are in excess of 18m. This should ensure that these units retain a reasonable level of privacy.

No. 44 High Street

- 8.401 Three-storey building with commercial at ground floor and residential above, located to the south and west of the site on the same side of the High Street.
- 8.402 There would be a separation distance from the windows and balconies of Block B of at least 18m to the windows serving within no. 44 High Street. This should ensure that these units retain a reasonable level of outlook and privacy.

Nos. 24 High Street

- 8.403 Two-storey building with commercial at ground floor and residential above, located to the south and west of the site on the same side of the High Street.
- 8.404 The separation distances are significant ensure that this unit retain a reasonable level of outlook and privacy.

Noise, Disturbance and Lighting

- 8.405 The proposed private balconies/terraces are typically between 5sq.m- 9sq.m in size and not capable of hosting large gatherings of people. They are all a sufficient distance from neighbouring properties to ensure that the occupants would not experience excessive levels of noise and disturbance.
- 8.406 On the seventh floor there are larger private terraces as the buildings steps in from the sides. These are between 10sq.m-52.5sq.m and could host quite larger gatherings. However, given their elevated position, siting relative to neighbouring residents' windows and the town centre location, it is not considered they would result in excessive levels of noise and disturbance.
- 8.407 The communal terraces at eighth and ninth floors would be sizeable with capacity to host large groups and generate high levels of noise and disturbance if not managed properly, although it is noted that they are sited relatively far from neighbouring windows. Details of how the external communal spaces would be managed should be included within an operation management plan, further details of which should be secured by condition.
- 8.408 Conditions should be attached requiring the submission of details of any plant equipment to be accompanied by a noise impact assessment and requiring the applicant to adhere to the recommendations within the submitted Noise and Vibration Assessment. A noise management plan for the leisure centre should be secured by condition ensuring that suitable insulation is installed to the residential units above, suitable consideration and mitigation given to free-weight areas, details of opening and closing of doors and windows and ventilation levels and details of amplified noise and opening hours.
- 8.409 Further details of a lighting strategy should be secured by condition to ensure any lighting would not cause undue nuisance to neighbours.
- 8.410 Noise during construction would need to be managed through a construction management plan to control hours of work, and statutory nuisance legislation would apply through Environmental Services. A construction and environment management plan would be secured through a condition.

Trees, landscaping and biodiversity

- 8.411 The NPPF stipulates that decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long term maintenance of newly-planted trees, and that existing trees are retained wherever possible

- 8.412 Policy DM28 of the Local Plan seeks to protect and enhance the borough's woodlands, trees and hedgerows.
- 8.413 Policy DM27 of the Local Plan aims to enhance biodiversity across the borough and improve access to nature.

Trees

- 8.414 It proposed that two street trees close to the corner of Woburn Avenue and High Street would be lost as a result of the proposed development. They are both category B trees (one an Italian alder and the other a False acacia), with the Alder in particular a tall and prominent street tree that contributes to the visual amenity of the street. However, the tree is poorly positioned within the middle of the pavement and cannot be saved without pulling Block A back several meters. Whilst the loss is unfortunate, the proposal includes three additional street trees along Woburn Avenue and six street trees along Whytecliffe Road South. This would contribute to the NPPF's aspiration for tree-line streets. Details of protection measures for the remaining street trees should be secured by condition.
- 8.415 Within the site 85 trees and 106sq.m of hedge/scrub are proposed. This includes approximately 30 trees within the public realm on the site. This includes a broad mix of tree species across the site and a mix of cherry's in the square. The final selection of planting species will need to evidence climate resilience, visual quality and seasonality, play consideration, ecological value, locality, safety considerations and a realistic response to future maintenance constraints. The proposed greenery would help break up the proposed built form, soften its appearance and contribute to a pleasing pedestrian route to the square. Stand-out species would help denote the status of the square as a focal point for Purley. It would also have sustainability and environmental benefits including improving air quality and reducing the urban heat island affect.
- 8.416 The proposed development would result in vastly more trees being replanted than trees being lost which would be a significant public benefit to the area.
- 8.417 The courtyard at the rear of Block B is mostly occupied by access and servicing routes. Due to its siting to the north of the large mass of proposed development it is important that planting to this space is shade tolerant. Planning conditions are recommended to secure the details of planting to ensure acceptability.

Urban Greening

- 8.418 Policy G5 of the London Plan provides guidance on urban greening. It states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping. In the absence of local targets, the Mayor recommends an Urban Greening Factor (UGF) target score of 0.4 for developments that are predominately residential.
- 8.419 The Urban Greening Factor of the proposed development is 0.4, thus meeting London Plan's target. It is noted that the scheme includes large areas of green wall that are likely to be shaded. If these locations prove incapable of supporting the green walls there is potentially scope for additional roof level bio-diverse layers. A

condition is recommended to ensure the development delivers in line with the submitted assessment.

Ecological Impact

- 8.420 A PEA (Preliminary Ecological Appraisal) was undertaken and submitted as part of the application. The ecology consultant to the Council reviewed the report and is satisfied that there is sufficient ecological information.
- 8.421 The site broadly has a low ecological value, due to the absence of notable areas of habitat.
- 8.422 The PEA notes that there is potential for bats to roost on site, although likely considered absent. There is also potential for there to be nesting birds. The PEA recommends that a Precautionary Method of Working is produced once a contractor has been appointed and details of the proposed demolition works are known, and that demolition / site clearance works take place outside of bird nesting season (March-September) or an ecologist is appointed to check for nesting birds.
- 8.423 Conditions are recommended requiring the development to be built in accordance with the ecological appraisal recommendations and for the submission of a construction environmental management plan.
- 8.424 Enhancements include biodiverse green roofs, roof gardens, street trees, green walls (climbing plants) and hedges, and the provision of bird and bat boxes. Eight bat boxes have been proposed, although this is below guidelines, and it is recommended that 13 are provided. Further details of biodiversity enhancement measures including maintenance should be secured by condition.

BNG (Biodiversity Net Gain)

- 8.425 BNG is a requirement to make sure that habitats for wildlife are left in a measurably better state than they were before the development. In England it is a mandatory requirement to deliver a BNG of at least 10%.
- 8.426 A Biodiversity Net Gain Assessment including a Statutory Biodiversity Metric Calculation has been submitted with the application and has been reviewed by the Council's ecology consultant.
- 8.427 The ecologist is satisfied that there is sufficient information at application stage and notes that the development would likely result in a significant biodiversity net gain of +1.64 habitat units (+417.19%). A Habitat Management and Monitoring Plan should be in line with the approved Biodiversity Gain Plan, with the maintenance and monitoring secured via legal obligation for a period of up to 30 years.

Access, parking and highway impacts

Connectivity

- 8.428 The site is located in an area with a Public Transport Access Level (PTAL) of 5 (very good) with the site in easy walking distance of local amenities, as well as bus services and Purley Train Station.

- 8.429 Purley Train Station is part of the Thameslink network, and provides direct services to local destinations as well as other town centres, including several central London stations, Horsham, Reigate, Luton, and Gatwick Airport.
- 8.430 Within 400m of the site are stops for the 407, 412, 434, 455, 405, 127, 289, 166, 466, and 60 buses, providing access to a wide range of destinations.
- 8.431 Cycle storage facilities are available at Purley Station and on-street near the site, and there is a taxi rank at the station entrance accessed from Whytecliffe Road South.
- 8.432 Purley also has several town centre public car parks, including the existing multistorey car park on the site.

Policies

London Plan

- 8.433 The London Plan's overarching modal shift ambition is to reduce reliance on cars, promoting cycling, walking, and public transport use instead. The plan sets maximum parking standards to ensure that new developments do not contribute to excessive car parking provision, which could undermine these sustainable transport objectives.
- 8.434 London Plan Policy H1 (Increasing housing supply) requires boroughs to optimise potential for housing delivery through planning decisions, including mixed-use redevelopment of car parks (Policy H1(B)(2)(b)). Within town centres, Policy SD7 requires boroughs, within development plans, to identify sites suitable for higher density redevelopment, including comprehensive redevelopment of low-density supermarket sites, surface car parks (Policy SD7(C)(6)(a)).
- 8.435 Policy T6 explains that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. Where sites are redeveloped, parking provision should reflect the current approach (i.e. car-free) and not be re-provided at previous levels where this exceeds the standards set out in this policy.
- 8.436 TfL in coordination with the Mayor of London has published Healthy Streets for London (2017), which highlights that "roughly half of all walking journeys in London are part of longer public transport journeys – walking to or from the bus stop or Tube station. This means an efficient and affordable public transport system is just as important as great walking and cycling routes to both the health of Londoners and the smooth functioning of the city's streets. Developing new housing around stations and improving connections to town centres will mean more people have the things they need within walking or cycling distance, while destinations further afield will be easily accessible by public transport".

Croydon Local Plan

- 8.437 Local Plan policies SP8 (Transport and Communication), DM29 (promoting sustainable transport) and DM30 (car and cycle parking in developments), are relevant to the proposal.

- 8.438 Policy SP8.15 explains that the Council will encourage car free development in Centres, where there are high levels of PTAL and Policy SP8.16 states that the Council and its partners will seek to limit parking spaces in the borough. The supporting text explains that the requirement to reduce car use and promote low emission vehicles and alternative forms of transport originates from the need to improve the borough's air quality, reduce carbon emissions and achieve a shift to more sustainable lower impact modes of transport in order to improve quality of life in Croydon. In locations with high public transport accessibility and good connections to walking and cycling routes, housing developments that are car free or have low car ownership, or car clubs can provide a feasible option.
- 8.439 The Local Plan broadly accords with the London Plan's approach in supporting a car-free development.
- 8.440 However, the Local Plan does lend some support to the provision of some public parking where there is evidence of need.
- 8.441 The site allocation accords with London Plan Policy SD7, identifying potential for redevelopment, but it also permits some car parking to be provided as part of that redevelopment.
- 8.442 Local Plan Policy DM30 explains that, to reduce the impact of car parking, development which results in the loss of existing car parking spaces, must demonstrate that there is no need for these car parking spaces at peak times.
- 8.443 The Local Plan does not define "need" for car parking spaces, but the supporting text at paragraph 10.45 explains that:
- 8.444 *"Not all existing car parking is needed and sometimes the redevelopment of an existing car park (either public or private) will help to provide much needed homes, social infrastructure and employment. In order to ensure that sufficient car parking is provided in schemes involving the redevelopment of an existing car park, applicants will need to demonstrate that there is no need for any car parking spaces that are proposed to be lost. Need should be demonstrated through occupancy surveys of both the existing car park and other car parks serving the same area and must cover a range of times and dates such that peak operating times are surveyed."*

National Policy

- 8.445 Further to the policies in the Development Plan, the NPPF (2024) explains that in town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists. It stops short however of setting out a position on the amount of parking within town centres, remaining neutral on this point.
- 8.446 It also explains that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Parking for the Leisure Centre and IRC

- 8.447 London Plan Policy T6 states that car free developments (with exception of disabled parking provision) should be the starting point for all development proposal in places well connected by public transport, and that the absence of local on street parking controls should not be a barrier to new development.
- 8.448 The provision of a car free development, with the exception of disabled parking spaces, given the high PTAL is supported. Residents' eligibility for parking permits is recommended to be restricted through a legal agreement.
- 8.449 London Plan Policy T6.1 on disabled parking requires a minimum 3% of dwellings to be provided with a car space, with a potential further 7% provided in the future. Based on the development providing 123 independent living homes, this would be a minimum of 4 spaces to be provided at the outset, and a maximum of 12 spaces depending on need. The submitted plans show 4 blue badge spaces for the IRC, and a planning condition will be used to secure these spaces and allow the submission of revised plans to increase the number of blue badge spaces as required in future.
- 8.450 The applicant has proposed to provide up to 28 car parking spaces for the operation of the IRC (including the aforementioned four blue badge bays). These would be initially made available for use by the public, but they would reserve the right to annex up to 24 of those at their behest, which could conceivably be on the first day of the IRC opening.
- 8.451 The applicant has failed to evidence the need for the additional 24 bays for the IRC, stating that they would be for visitors/carers to the extra care and care suites. They explain that there are several scenarios, such as out of hours visiting, care workers, visiting specialists with equipment, family members travelling from locations with poor access to public transport, in which the use of the parking spaces will be necessary. However, it is not clear why visitors could not use the car parking provision within the proposed car park, as can care workers arriving at night when the occupancy will be lower.
- 8.452 There is little justification for the level of private parking proposed and as such it would fail to comply with the London Plan which seeks the new IRC to be car-free.
- 8.453 No parking is proposed for the Leisure Centre, with visitors expected to park within the public parking within the town centre or use more sustainable forms of transport. This approach accords with London Plan Policy T6.4 (Hotel and leisure uses parking) which explains that for leisure uses in locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.

Town Centre Public Parking

- 8.454 At present the existing multi-storey car park (MSCP) provides 412 car parking spaces comprising 325 long-stay and 87 short-stay bays. There are also 12 motorcycle bays.
- 8.455 The proposal would demolish the car park, and replace it with a smaller car park with 78 spaces in total (split between private and public parking). The applicant's

submission proposes that 50 spaces would be public, and their assessment was undertaken on that basis.

- 8.456 The existing car park has both long and short stay bays. When assessing the need for parking, short-stay parking is considered to support the viability of the town centre, promoting a high turnover of customers and visitors to local businesses and services. There is a clearly defined need and rationale for ensuring that parking exists to support the facilities, services and businesses within the town centre, supported by the NPPF.
- 8.457 Given Purley's good connectivity, local residents and those commuting into the town centre (or using the station to commute elsewhere) can access it using other forms of transport. Whilst long-stay parking may be desirable for local residents and commuters, the need for it is therefore less apparent. The town centre's accessibility reduces the reliance of its residents on private car use, and the accessibility of the station by other forms of public transport means that most commuters, residents and longer-stay visitors can access it without needing long-stay car parking. Furthermore, whilst the car park accommodates long-stay parking, the surveys carried out by the applicant demonstrate that only 4-5% of car park users stayed for more than 5 hours, (and 85-86% of users stayed for less than 2 hours) meaning that the impact on long-stay parking patterns in the town centre would be limited.
- 8.458 Whilst acknowledging the existing provision of both long-term and short-term parking spaces, this assessment therefore concentrates on short-stay parking which is needed to support the function of the town centre.
- 8.459 The applicant has calculated the provision of car parking within the wider town centre. This shows that there are currently up to 1214 parking spaces including on-street parking. This includes up to 479 spaces provided for the existing Tesco superstore, which are intended for customer use only, but are not monitored.
- 8.460 To demonstrate the existing need for town centre parking the applicant undertook parking beat surveys of the MSCP (412 spaces), Russell Hill Place car park (56 spaces) and Tesco car park (479 spaces) totalling 947 spaces. It did not include any on-street parking spaces or the Station Car Park (as primarily commuter parking). The survey data was obtained using ANPR cameras monitoring daily entry/exit counts and duration of stay.
- 8.461 The data showed that there is a peak weekday requirement between 1pm-2pm of 447 parked cars (50% of the total), with a residual capacity of 470 spaces; and a peak weekend (Saturday) requirement between 11am-12pm of 502 parked cars (53% of the total), with a residual capacity of 445 spaces. This demonstrates that even at peak time there was a residual capacity of 445 parking spaces in the town centre.
- 8.462 Following the proposed development the combined capacities of the Russell Hill Place and Tesco car parks plus the 50 public spaces proposed within the development would provide a capacity of 585 spaces.
- 8.463 As mentioned earlier, ensuring adequate provision of short-stay spaces is viewed as the priority as they are most likely to contribute to the vitality of the town centre.

- 8.464 The applicants assessed short-stay demand, classifying vehicles parked for less than five hours in the existing MSCP and Russell Hill Place car park as short-stay, as well as all spaces within Tesco car park. The future leisure centre demand was also projected using comparable facilities.
- 8.465 This showed in relation to short-stay parking that there would be a peak weekday capacity between 1pm-2pm of 279 parked cars (47.6% of the total) and a peak weekend (Saturday) capacity between 11am-12pm of 470 parked cars (80.3% of the total). This demonstrates that even at peak time there was a residual capacity of short-stay car parking spaces in the town centre.
- 8.466 Whilst Tesco presently offers town centre car parking, in the future it could potentially close and remove the car parking, change the terms of use, or as an allocated site could be redeveloped with a smaller car park. Therefore, a further analysis has been undertaken by the applicant to demonstrate the impact without the Tesco car park.
- 8.467 Removing the Tesco car park from the analysis (and also any cars that were parked in it as it is difficult to distinguish between those solely shopping in Tesco and those visiting the wider town centre), it shows that there would be a 14 space shortfall during the peak weekday occupancy (between 3pm-4pm) and a 8 space shortfall during the Saturday peak.
- 8.468 It is noted that Purley Mosque is under construction close to the site on Whytecliffe Road South, which has not been reflected in the parking surveys. The applicant has obtained expected car parking demand for the mosque from the Transport Statement submitted in support of the planning application (ref. 19/02109/FUL) for its redevelopment.
- 8.469 This demand combined with the expected future scenario would result in there being residual capacity of 336 spaces with Tesco and a 30 space shortfall without.
- 8.470 Representations have been made stating that the demand for car parking from the mosque has been under-estimated within the applicant's supporting data.
- 8.471 The data for the mosque application (ref. 19/02109/FUL) suggests that for the maximum of 250 visitors (on a Friday lunchtime), in a worst case scenario, there would be potentially 158 car drivers (139 existing plus 19 additional)). In this scenario, which is a worst case, there would be 148 spaces with Tesco and a 165 space shortfall without.
- 8.472 This scenario is unrealistic as it fails to reflect the impacts of the Green Travel Plan which is required to be submitted prior to first occupation to promote sustainable modes of transport, noting the high level of public transport accessibility of the location. Policy T1 of the London Plan sets out a strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041, the evidence from application ref. 19/02109/FUL is that only 32% of trips to the mosque are by such modes, meaning there is significant scope to reduce car journeys to the mosque. Furthermore, parking spaces will still be available for use by attendees to the mosque most in need (those with accessibility requirements or the elderly) in addition to other parking which is further afield but within walking distance (such as Tesco, or on-street parking on nearby streets). The site has a PTAL of 5, as does the mosque, and future visitors who are unable to find car parking will be able to

travel using local buses and trains, and emerging sustainable formats such as car clubs, as well as cycles and e-bikes (for which substantial amounts of parking are proposed within the development).

- 8.473 Whilst it is noted that following the proposed development short-stay town centre car parking would rely on the Tesco car park to meet peak occupancy rates, this would be event-based parking, rather than continuous, and it is noted that the mosque application also includes a travel plan with the aim to reduce car usage over time. The overspill parking from visitors to the mosque within the town centre would put pressure on car parking levels, however it would not cause an unacceptable impact on highway safety, and the residual cumulative impacts on the road network, following mitigation, would be not severe (taking into account all reasonable future scenarios, including the potential for further town centre redevelopment, and the impacts of the mosque's green travel plan).
- 8.474 It is also important to re-iterate that whilst the development would reduce the amount of car parking available to visitors of the town centre, London Plan policy is to discourage car use and encourage people to use more sustainable modes of transport.
- 8.475 Overall, the reduction in public car parking and the proposed provision of 50 short stay spaces would result in under-provision of short-stay car parking within the town centre, meaning that there would be loss of parking spaces for which need has been demonstrated. Without the mosque in operation, and omitting the Tesco Car Park, there would be an undersupply of up to 14 spaces (peak weekday); and 165 spaces at peak mosque attendance.
- 8.476 The amount of public parking proposed by the applicant would therefore conflict with Local Plan Policy DM30.
- 8.477 The NPPF explains that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.
- 8.478 In this case, the proposed car park would have 78 spaces. As explained above, the applicant's proposal to provide 24 spaces for the IRC (in excess of the 4 blue badge spaces) is not policy compliant.
- 8.479 As a result, officers have recommended a planning condition which would secure all of the parking as public parking, except for the IRC blue badge parking (for which there is justification).
- 8.480 This means that the development would provide 74 public parking spaces rather than the applicant's proposal of 50.
- 8.481 With this condition in place, and omitting the mosque and Tesco Car Park, there would no longer be an undersupply of short stay parking spaces within the town centre during the weekend and weekday peaks.
- 8.482 In a future scenario with the mosque constructed and opened, there would still be a projected worst-case scenario shortfall of 141 short stay spaces on a Friday lunchtime. However, as noted above this is an unrealistic projection as there will be a green travel plan in place to reduce car use by visitors to the mosque.

- 8.483 Furthermore, in a worst case scenario this number would be accommodated by the Tesco Car Park, which means that there would be no severe impact on the highway network, and in line with the NPPF planning permission should not be refused on this basis.
- 8.484 As a result, the reduced amount of parking at the site would not result in the loss of short-stay parking for which there is demonstrable need.
- 8.485 The proposal would lead to a significant loss of long-term car parking which is used by (amongst others) commuters, local residents and local businesses. Whilst there is some justification through supporting the vitality of the town centre to retain short-stay car parking, there is less justification to retain long-stay parking. Maintaining long-stay spaces for local residents living in the town centre in 'car free' developments conflicts with the relevant development plan policies as it undermines their car-free nature and fails to discourage private car ownership.
- 8.486 Following the development, there would still be a high-level of commuter parking space availability at the station car parks, which would total approximately 183 spaces (were the re-development of the north car park to proceed). The expectation for businesses located in areas with a high PTAL is that staff would travel to and from work via public transport, although there is still long-stay parking available within Russell Hill Place car park and on surrounding streets.
- 8.487 In their responses both the GLA and TfL suggest that all car parking should be removed, and no public parking provided given the high PTAL. They did acknowledge that there would be a significant reduction in the amount from the existing parking, which would bring the site closer, if not completely, in line with their preference. TfL also recommended the applicant explores opportunities to repurpose the car parking in the future to sustainable travel (for instance additional cycle parking, e-bike hire and public storage, or cycle maintenance) to create a more sustainable travel hub. This could be secured within the legal agreement.
- 8.488 Policy T6 of the London Plan requires that a Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design (with reference to private spaces, i.e. the blue badge spaces for the IRC). This will be secured within the s.106 agreement to ensure that the car park is managed appropriately, and to accommodate specific needs (for example care workers seeking to park within the public car parking spaces when working overnight).

On-street Parking and Public highway works

Whytecliffe Road South

- 8.489 Along Whytecliffe Road South the pavement would be widened and resurfaced. The taxi bays will be relocated and shortened (following agreement with TfL) and three on-street bays (including one blue badge) will be re-provided (overall net loss of one parking bay). The existing granite raised surface adjacent to Station Approach would be extended.

- 8.490 Existing access from Whytecliffe Road South to the MSCP would be removed. New vehicular access points would be provided on Whytecliffe Road South for the car park and access to the rear courtyard.

High Street and Woburn Avenue

- 8.491 Sections of land including the public realm along Woburn Avenue that have become permissive highway through the passage of time will be stopped-up and small areas adopted.
- 8.492 Extension of red paving along adjacent pavement of Woburn Avenue. Provision of cycle stand along High Street.
- 8.493 Two car parking bays will be removed to allow access to the proposed square and one re-positioned to allow clear turning out of the servicing access route.

Car Club

- 8.494 Local Plan Policy SP 8.13 requires new development to contribute to the provision of car clubs and car sharing schemes. Table 10.1 requires on site car club/pool car club spaces for non-residential development to be provided at rate of 5% of all spaces, with a minimum of 2 car parking spaces, and for residential development to be at rate of 5% of the total spaces, with a minimum of 1 car parking space plus additional spaces at a rate of 1 space for every 20 spaces below the maximum overall number of car parking spaces.
- 8.495 Two car club spaces have been sought but not provided. The applicant has suggested that the proposed two car club bays within the proposed development at no. 26-53 Whytecliffe Road South are sufficient. However, there is no certainty that the scheme would be delivered, nor is there sufficient evidence that having an additional two car club spaces here would lead to an over-supply. Were car club spaces proposed their usage could be monitored and if there is insufficient demand then removed. It is recommended that the provision of a car club either on or off site is secured within the legal agreement (unless it is demonstrated that there is no demand for such a facility).
- 8.496 Membership to a car club paid for an initial 3-year period for future residents should be secured within a legal agreement.

Parking Summary

- 8.497 Subject to the recommended condition, the proposed development would accommodate the majority of short-stay parking needs of the town centre and provide a car-free residential and leisure development, in accordance with the development plan policies. When considered cumulatively with the consented mosque on Whytecliffe Road South, there is the potential for a weekly Friday shortfall in public car parking in the town centre, although this would be mitigated by the presence of the Tesco Car Park which could accommodate the overspill, and the requirement for a green travel plan which aims to reduce car use over time.
- 8.498 In addition, there would be a loss of up to 3 on-street spaces and a requirement for at least 2 car club vehicles, so the potential displacement of up to 5 parking spaces,

which would be mitigated by the proposed public car parking spaces and a review of the layouts of High Street and Whytecliffe Road South.

8.499 As a result, the proposed parking provision would be acceptable.

Mini-bus/coach parking

8.500 It is noted that the existing facility did not have a dedicated parking bay for a mini-bus. Furthermore, the applicants transport consultant suggests schools tend to prefer to use either public transport or walk children to swimming pools rather than using a minibus or coach.

8.501 Nonetheless, they have explored some potential options for minibus parking, which includes using the bus stop on Whytecliffe Road South or temporarily stopping on the High Street. There may also be potential to wait (with the driver present) for a short period outside the public square as a clear area needs to be maintained for fire access. It is suggested that as part of the travel plan the applicant explore demand once the leisure centre is open and then justify and confirm which is the preferred approach.

Trip Generation

8.502 The applicant has used trip rate data to estimate the demand of the proposed development. The proposed travel demand (all uses) compared to the existing would result in less internal trips in both the AM and PM and less vehicles movements in the AM, although 9 additional vehicle trips in the PM peak. There would be a significant increase in pedestrian trips, but a fairly modest increase in public transport use (12 trips in the AM and 9 in the PM). Overall, the proposed development would not generate notable traffic or public transport demand, and therefore would not adversely impact the operation of the highway and public transport network. TfL has not identified any requirement to contribute towards transport capacity improvements.

Cycle Parking

8.503 London Plan Policy T5 sets out that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This policy sets out the required number of spaces and explains that it should be fit for purpose, secure and well-located.

Long Stay Cycle Provision Proposed

- Block A = 20 spaces
 - Next to Leisure Centre (Woburn Ave) = 8 spaces
 - Block C = 18 spaces
- Total = 46 spaces

Long Stay Cycle Provision Needed

- Block A (35 x bedrooms) = 4 spaces
- Next to Leisure Centre = 4 spaces
- Block B/C (205 x bedrooms) = 20 spaces

- Block B/C (care) = 10 spaces
 - Block B/C (ancillary) = 5 spaces
- Total = 43 spaces

8.504 The proposal would over-provide on long-stay cycle spaces. However, the provision would not be equitably split. There would be an overprovision of spaces in Block A and a shortfall serving Blocks B/C. This would result in some residents having to travel a long distance to store their bikes. It would also result in workers in the IRC and the residents having to share a store. However, overall, on-balance, the provision is adequate and further details of the stores and parking can be secured by condition.

Short Stay Cycle Provision Proposed

- Courtyard = 16
 - Public Square = 16
 - High Street = 20
 - Woburn Avenue = 10
- Total = 62

8.505 Only 56 short-stay cycle parking spaces are required therefore this would be an over-provision. In addition, there are 10 existing spaces adjacent to the existing leisure centre which could potentially be deducted from the total required. The proposed provision is reasonably well spread across the site, although there would be an expectation for some parking to be on Whytecliffe Road South. Furthermore, the proposed provision along both High Street and Woburn Avenue is poorly located likely to result in excessive clutter and impede pedestrian movement. Therefore, further details of the short-stay cycle parking should be secured by condition.

Servicing and access

- 8.506 The access to the car park and rear courtyard for the IRC would be via Whytecliffe Road South, with access to the basement service yard use the existing car park access from High Street (albeit adapted). There would be pedestrian access to the square via High Street. There would be a private pedestrian (e.g. staff) access to the leisure centre via Woburn Avenue.
- 8.507 Most of the servicing and deliveries are expected to take place from the servicing yard beneath Block B and the public through route. Some additional servicing, mostly picking-up and setting-down care residents would happen via the rear courtyard. There would be limited servicing from Woburn Avenue (refuse collection) and on-street loading can take place from existing locations on Whytecliffe Road South, such as the taxi rank during daytime.
- 8.508 A delivery and servicing plan shall be secured through condition.

Waste and Recycling

- 8.509 The applicant has submitted an operational waste management strategy.

- 8.510 There will be some refuse collection off Woburn Avenue. Currently refuse vehicles (including Council residential collections) access this road for collection so no additional arrangements are required. However, the majority of collection would be from the main servicing yard, accessed via High Street. Swept path analysis demonstrates that refuse vehicles can get direct access to the refuse stores and enter and exit the site in forward gear.
- 8.511 For Block A, residents will deposit their waste within the bin store on the ground floor of the building, which will then be directly accessed by the Council's team on collection day. For Blocks C and D residents will deposit their waste within bin stores located on each floor. The management team will then transfer that waste to the main bin store within the servicing bay to then be collected by the Council's team. The proposed bin store is of an insufficient size to accommodate the necessary waste and recycling bins; therefore the applicant has suggested paying for additional waste collections to meet the shortfall. The additional collections would ensure that there is adequate space for the necessary bins within this store. Further details of the waste management strategy should be secured by condition.

Sustainable Transport

- 8.512 Given that the residential component of the development would be car-free, increased walking, cycling and public transport use is expected. The impact of additional development within the area, including the proposed development, is expected to require upgrades to existing infrastructure and therefore a sustainable transport contribution is to be secured in the legal agreement to mitigate the impacts of this scheme and secure improvements, which could include highway and bus infrastructure.
- 8.513 A Healthy Streets Transport Assessment (TA) including Active Travel Zone (ATZ) assessment has been submitted to support the application in line with TfL's guidance. The Active Travel Zone Assessment reviews key local pedestrian routes and identified improvements. One of the major benefits of the development in sustainable transport terms is the provision of the public square and public route from Whytecliffe Road South to the High Street. This would create a vastly improved pedestrian environment, that is of benefit to residents but also significantly improves a key pedestrian route through the town centre thereby supporting the Healthy Streets approach. This improvement further encourages healthy active lifestyles and sustainable modes of transport.
- 8.514 A framework Travel Plan was submitted with the application that covers the entire development. A Sustainable Travel Manager (STM) will be appointed to take responsibility for the Site-wide management of the TP and for ensuring its delivery. To ensure that there is Site-wide adoption of the TP, the STM will be assisted in delivering the measures by Travel Plan Co-ordinators.
- 8.515 It is noted that the Travel Plan could be much more ambitious given the development location, with regard to travel by car and have a greater than 75% travel by sustainable modes target. In addition, the car share mode for the leisure centre does not change over the 5 years of the Travel Plan monitoring, when they should be facilitating a drop in the use of cars to access the leisure centre. The Travel Plan could also be more ambitious in terms of cycle travel to the site both by residents and staff.

- 8.516 Further details of the Travel Plan and monitoring for five years is to be secured through the legal agreement.

Construction Traffic

- 8.517 A draft construction logistics plan has been submitted with the application to help mitigate the impact of the development during construction on both the highway and residents' amenities. Measures include entering the considerate constructor scheme, appropriate FORS accreditation, noise reduction measures, dust mitigation measures, delivery timings and working hours. Further details of the existing highway condition and utility connections is necessary. There is also the potential for this development and the site opposite to come forward at the same time. Provision must be made for this eventuality and cooperation sought to ensure that the two can proceed concurrently with minimal inconvenience to local residents and highway users. An update construction logistics plan should be secured via condition.

Flood risk and SuDS

- 8.518 The NPPF explains that Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 8.519 Local Plan Policy DM25.1 requires development to take account of all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses.
- 8.520 Local Plan Policy DM25.2 requires development at risk from flooding to be safe for the lifetime of development and to incorporate flood resilience and resistant measures.
- 8.521 The site is almost entirely within Flood Zone 1, with only a small portion (corner of Woburn Avenue and High Street) within Zones 2 and 3 (associated with the culverted River Wandle). The portion within the flood zone would appear to just cover the pavement with the remainder of the site within Flood Zone 1 and at a very low risk from fluvial flooding.
- 8.522 The site is at a low-medium risk from surface water flooding with the High Street at a high risk. The site is also located within a High Groundwater Vulnerability Area, where there is potential for groundwater flooding to occur at surface and lies within the Brighton Road Critical Drainage Area.

Caterham Bourne Flooding

- 8.523 A sequential test is required for major development if any proposed building, access and escape route, land-raising or other vulnerable element will be in flood zone 2 or 3.
- 8.524 Whilst the site small corner of the site would fall within flood zones 2 and 3, it is a very small area relative to the size of the site and would not accommodate any built development. It is therefore not considered necessary to apply the sequential or

exception tests, also noting that the site has been allocated for the development proposed.

- 8.525 In accordance with paragraph 181 of the NPPF, appropriately the most vulnerable development is located in areas of lowest flood risk.
- 8.526 The proposal has been reviewed by the EA who have not raised any concerns regarding the proximity of the proposal to nearby flood zones.

Groundwater and surface water flooding

- 8.527 A sequential test is required for major development if any proposed building, access and escape route, land-raising or other vulnerable element will be subject to sources of flooding other than rivers or sea. Exemptions include where the proposal is consistent with the sites allocated use, as is the case in this instance.
- 8.528 The layout of the site, in which car park and leisure centre help form the majority of ground and lower ground floor levels helps provide a barrier to the upper floor residential units. It is therefore considered that the risk to the residential occupants is low.
- 8.529 The proposal has been laid out to ensure that the area with the higher risk near the High Street is predominately the public square. The care suites are the most vulnerable part of the development, and they are located in an area with lower flood risk, and their escape route is via Whytecliffe Road South.
- 8.530 To help minimise the potential of surface water flooding and ground water flooding a range of SuDS measures are proposed and set out below.

SuDS

- 8.531 Local Plan Policy DM25.2 requires development to incorporate Sustainable drainage systems (SuDS). The London Plan specifies that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 8.532 In terms of constraints the underlying bedrock is white chalk, which is not suitable for infiltration. The site is within Source Protection Zones 1 -3 and is an area at medium to high groundwater vulnerability. The existing site is almost entirely hardstanding.
- 8.533 The submitted Flood Risk Assessment & SuDS Report follows the drainage hierarchy within London Plan Policy SI13, explaining why certain SuDS techniques are not included or cannot be achieved. The Lead Local Flood Authority (LLFA) is satisfied with this approach and the conclusion that the use of blue roofs (230.52cbm), permeable paving (67.6cbm) and below ground attenuation tanks (481.84cbm) prior to discharge into Thames Water's sewer along Purley High Street is the most appropriate form of attenuation. There will be additional discharge from the car park basement and mezzanine level into the sewer along Whytecliffe Road South, although all rainfall related run-off will be funnelled towards the attenuation tanks.

- 8.534 The proposed drainage strategy demonstrates that the surface water discharge into Purley High Street sewer would be limited to 3.59l/s for all events up to and including the 1% (1 in 100) plus 40% climate change allowance. For discharge to the sewer network along Whytecliffe Road South it would be 1l/s.
- 8.535 The greenfield run-off rates are $Q_{bar} = 1.10$ l/s, $Q_{1yr} = 0.93$ l/s and $Q_{100yr} = 3.50$ l/s, which the proposal would not achieve. The existing run-off rates are $Q_{1yr} = 101.7$ l/s and $Q_{100yr} = 288$ l/s. Whilst the proposal would not achieve greenfield run-off rates it would represent a significant improvement over the existing rates. The LLFA acknowledge the constraints of the site and overall are satisfied with the run-off rate proposed.
- 8.536 The proposed attenuation would meet not greenfield run-off rates but would represent a significant improvement on the current rates and is considered acceptable in this instance. Further details are required by the LLFA including a topographical survey. A condition should be attached requiring the submission of an updated SuDS Strategy.
- 8.537 Thames Water has identified an inability of the existing foul water network infrastructure to accommodate the needs of this development proposal. They therefore recommend a condition requiring that all necessary network upgrades required to accommodate the additional flows from the development have been completed or that a development and infrastructure phasing plan is agreed.

Energy efficiency and sustainability

- 8.538 The NPPF explains that the planning system should support the transition to net zero by 2050 taking full account of all climate impacts and help to shape places in ways that contribute to radical reductions in greenhouse gas emissions.
- 8.539 London Plan Policy GG6 explains that developments must seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050. They also must ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.

Zero Carbon

- 8.540 Local Plan Policy SP6.2 requires new development to minimise carbon dioxide emissions, including that new dwellings (in major development proposals) must be Zero Carbon. As a minimum a 35% reduction in regulated carbon emissions over Part L 2021 is required, of which 10% and 15% respectively for residential and commercial elements, achieved through the use of passive and energy efficiency measures, with the remaining CO₂ emissions to be offset through a financial contribution. The policy also requires major developments to be enabled for district energy connection unless demonstrated not to be feasible.
- 8.541 The submitted energy strategy sets out how the proposed development would aim to reduce carbon emissions through the “lean, clean, green, seen” energy hierarchy. The energy strategy demonstrates that CHP would not be suitable.

- 8.542 The London Plan stipulates that 10% of residential and 15% of non-residential Be Lean CO2 savings (from energy demand reduction) should be achieved. Through energy efficiency measures the residential component would achieve 15.8% savings. At the Be Green stage, the residential component, through renewable technology (ASHP - Air source heat pumps) would save a further 53.9%, therefore overall, this component would achieve a 69.7% CO2 emission reduction against Building Regulations 2021, Part L, significantly exceeding the minimum 35% reduction.
- 8.543 The non-residential component (including the leisure centre) would only achieve a 5.5% reduction at Be Lean stage – somewhat short of the 15% target. The non-residential component, through renewable technology (PV panels) would save 12.3% at Be Green stage, therefore overall, the non-residential component would achieve only a 17.8% CO2 emission reduction against Building Regulations 2021, Part L, significantly falling below the 35% target.
- 8.544 The largest element of the non-residential floorspace is the leisure centre. It is acknowledged that a leisure centre and particularly a swimming pool will inevitably be energy intensive as it must maintain a warm environment with high humidity plus maintain the temperature of the pool.
- 8.545 The applicant has incorporated a number of energy efficiency measures including triple-glazing, wastewater heat recovery and external shutters. The estimated EUI (Energy Use Intensity) for the proposed leisure centre is 184 (GLA suggests a target of 55) and the space heating demand is 8.9 (GLA suggests a target of 55). This suggests that energy demand as expected would be high, but space heating demand would be reasonably low suggesting an efficient building.
- 8.546 The Note to accompany GLA Energy Assessment Guidance 2022 explains that, 'initially, non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35 per cent improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments.' The GLA therefore acknowledge that presently the non-residential energy requirements are difficult to achieve. In their response they note that the energy efficiency measures used are good. Therefore overall, noting that the swimming pool is very energy intensive (heating of pool and high-level of humidity), the proposed non-residential energy measures are considered acceptable in this instance.
- 8.547 Combined, overall, there would be a 11.5% reduction at Be Lean stage and 36.5% reduction at Be Green stage, achieving a total reduction of 48%.
- 8.548 These reductions exceed the minimum on-site requirement of a 35% reduction. However, there would still be a shortfall of 52% against the London Plan Zero Carbon Policy requirements, which the applicants propose to off-set through a payment in lieu to the Council that is estimated to be £375,751 (secured through the legal agreement). This figure could be reduced if additional on-site savings were made later down the line.
- 8.549 A condition should be imposed on any permission requiring the applicant to demonstrate that the CO2 emission on-site reductions have been met as a minimum.

- 8.550 Overall, these reductions exceed the London Plan Zero Carbon Policy requirements and would be viewed as a public benefit of the proposal.

Whole Life Carbon

- 8.551 Applications referable to the mayor should calculate whole lifecycle carbon emissions, which should fully capture a development's carbon impact. This approach should capture its unregulated emissions (i.e. those associated with cooking and small appliances), its embodied emissions (i.e. those associated with raw material extraction, manufacture and transport of building materials and construction) and emissions associated with maintenance, repair and replacement as well as dismantling, demolition and eventual material disposal.
- 8.552 The submitted Whole Life-cycle Carbon Assessment considers the embodied carbon within the proposed development from construction frame to fixtures and fittings, the materials lifespan, level of maintenance, recyclability at the end of life and transportation of the materials to site.
- 8.553 The proposal falls short against some of the GLA benchmarks, although the GLA are satisfied with the applicant's justification for this and encourage them to consider further ways of reducing carbon throughout the detailed design stage. The applicant set-out further opportunities to improve their performance including exploring cement replacement within the structural concrete.
- 8.554 A condition should be imposed requiring the submission of a post-completion whole life carbon report.

Circular Economy

- 8.555 London Plan Policy SI7 identifies a circular economy as one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. It places an emphasis on creating a built environment where buildings are designed for adaptation, reconstruction and deconstruction.
- 8.556 A Circular Economy Statement (CE) has been submitted. The submission includes a Pre-Demolition Audit which explored retaining some of the existing buildings but largely discounted them for structural and logistical reasons. At present the basement box and concrete walls have been identified as reusable on site. The audit suggests that approximately 98.5% of demolition waste has the potential for material recovery which exceeds the 95% target. The Applicant has committed to achieving the 20% recycled content target for the construction of the whole building.
- 8.557 The CE Statement confirms that the approach for the proposal will centre on being designed for building replaceability and appropriately it will apply the six CE principles, including disassembly, adaptability, material reuse on-site and recycling.
- 8.558 The CE Statement explains that the use of the building is not anticipated to change in its lifespan. The focus is therefore on disassembly, adaptability, and material reuse.

8.559 Within the CE Statement the applicant commits to the following:

- To target diversion of a minimum of 95% of non-hazardous demolition waste from landfill for reuse, recycling, or recovery.
- To target diversion of a minimum of 95% of inert excavation waste generated from the Proposed Development from landfill for beneficial use.
- To target diversion of a minimum of 95% of construction waste generated by the Proposed Development from landfill for reuse, recycling, or recovery.
- To facilitate recycling levels in operation, which will exceed the municipal waste recycling target of 65% by 2030.
- To specify a minimum 20% of the total value of the selected products and materials to include recycled and reused content.
- Provide a post-construction report to the GLA.

8.560 The CE Statement has been reviewed by the GLA who are satisfied by its contents. considered appropriate and meet the requirements of London Plan Policy SI7. A Post Completion Report condition should be secured.

BREEAM

8.561 Local Plan Policy SP6 requires non-residential development with a floor area above 500sq.m to achieve BREEAM Excellent. To achieve Excellent a minimum score of 70% is required, 85% and above is an Outstanding score.

8.562 A BREEAM pre-assessment report has been submitted with the application. The fully fitted development is assessed with a targeted BREEAM score of 73.7% (Excellent), although there is potential to deliver up to 82%. The Excellent BREEAM rating will be secured by condition.

Water Use

8.563 In accordance with Local Plan Policy SP6.3, a planning condition is recommended to secure compliance with the domestic water consumption target of 110 litre/person/day, to ensure sustainable use of resources.

Environmental impacts

8.564 Policy DM23 states that the Council will promote high standards of development and construction throughout the borough by:

- a. Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land; and
- b. Ensuring that developments are air quality neutral and do not lead to further deterioration of existing poor air quality.

8.565 Policy SI1 of the London Plan sets out the spatial implications of the Mayor's Air Quality Strategy and how development and land can help achieve its objectives.

Air Quality

- 8.566 An Air Quality Assessment has been submitted with the planning application. The assessment acknowledges that the entire borough is declared as one Air Quality Management Area (AQMA).
- 8.567 The building will be entirely electric with no gas, or emergency generators and therefore there will be no building emissions associated with the development. The proposed development would be air quality neutral in respect of both building and transport emissions in accordance with London Plan requirements.
- 8.568 The assessment has been reviewed by the Council's pollution team and the GLA and is found to be acceptable. They request that the recommendations within the report be secured by condition. In addition, a Dust Management Plan shall be submitted as part of a Construction Environmental Management Plan in accordance with The Control of Dust and Emissions during Construction and Demolition SPG. A condition requiring details of the ASHP and other plant should be attached.
- 8.569 It is also recommended that restrictions on the use of Non-Road Mobile Machinery (NRMM) used during the course of the development are secured by condition.
- 8.570 Subject to the recommended conditions being secured on any permission, the proposal is considered to have an acceptable impact on air quality.

Contaminated Land

- 8.571 Local Plan Policy DM23 requires developments on or near potentially contaminated land to undertake a site investigation prior to the start of construction and to undertake any necessary remediation and aftercare measures.
- 8.572 A Geotechnical and Geo-environmental Desk Study Report has been submitted with the application.
- 8.573 It appears that the site comprised open undeveloped land until residential development occurred around the turn of the last century. By the 1950's the site was partially demolished, with full demolition occurring by the 1960s. After this the site was used as a car park until the MSCP, supermarket and leisure centre were built in the 1980's, matching the present-day layout.
- 8.574 The site has been assessed to have a very low to moderate/low risk, and as such a Phase 2 intrusive ground investigation is recommended, which should include soil sampling and ground gas/groundwater monitoring.
- 8.575 The report has been reviewed by the Council's contamination consultant and is found to be acceptable. They request a condition be secured requiring the submission of an intrusive site investigation and risk assessment, followed by remedial measures for the works and a validation report.

Microclimate

- 8.576 Local Plan Policy SP4.6 states that tall buildings will be required to minimise their environmental impacts. The applicant has submitted a wind report that assesses the impact of the proposal on nearby and surrounding land using a wind tunnel. The wind assessment looks at the expected existing and proposed wind levels in and

around the site in two scenarios (summer scenario and worst-case scenario). Scenarios with just the proposed development and also with the cumulative development (proposed development at no. 26-52 Whytecliffe Road South) were tested. The assessment ranks the impact of the wind from best 'suitable for long-term sitting and standing' to worst 'uncomfortable' with 'suitable for strolling' as a mid-point.

- 8.577 The assessment demonstrates that the existing site and surrounding area has wind conditions suitable for sitting and standing use during the windiest season, which are further improved in summer with much of the surroundings suitable for sitting.
- 8.578 In the proposed development only scenario the wind conditions would worsen around the site. However, the worst case in the windiest scenario would be 'suitable for strolling'. This would generally be along the public route adjacent to Block B and the corner of Block D, and this would be tempered to suitable for standing with the proposed landscaping. The majority of the site would be suitable for standing with the courtyard suitable for sitting. In the summer these would improve, with only the middle of the Whytecliffe Road South experiencing higher wind levels, with much of the surrounding area achieving a mix of suitable for sitting/standing. Importantly the area of the square identified for outdoor seating for the café would be suitable for seating. The balconies would achieve a mix of suitable for sitting and standing, which is expected given they are on elevated levels. A 1.5m balustrade to the terrace on Block B and screens to the seating areas are suggested as mitigation measures and should be secured by condition.
- 8.579 In the cumulative scenario the interaction with the proposed development at nos. 26-52 Whytecliffe Road South results in higher wind speeds, notably along Whytecliffe Road South. Here levels will be largely suitable for strolling during winter which reduces to standing during summer. However, with the proposed landscaping to the front of Blocks C and D it would be suitable for standing in winter.
- 8.580 Overall, subject to suitable mitigation the impact from wind would be acceptable.

Light Pollution and glare

- 8.581 Local Plan Policy DM10.9 and London Plan Policy D9 require developments to consider lighting schemes to minimise light pollution and not cause adverse reflected glare. Details of an external lighting scheme should be secured by condition to ensure that development would not cause a nuisance or harm ecology.
- 8.582 The predominantly brick finish with typical amounts of glazing should ensure that there would not be adverse reflective glare.

Fire safety

- 8.583 London Plan Policy D12 requires a fire statement to be submitted with all major applications. This should cover matters including the buildings materials, means of escape, features to reduce risk to life (e.g. fire alarms), access for fire service personnel and equipment, access for fire appliances and consideration of potential future modifications.

- 8.584 A Fire Safety Statement has been submitted with the application. The Building Safety Act 2022 introduced Planning Gateways which are a set of regulatory requirements designed to ensure safety is considered at every stage of a building's lifecycle.
- 8.585 The scheme is a 'relevant building' under Planning Gateway One and hence the Health and Safety Executive (HSE) were consulted. At Gateway One, site access, design principles, and impacts on nearby buildings and routes are considered.
- 8.586 The GLA has confirmed they are satisfied with the submission in relation to fire. Neither the HSE nor the Council's Principal Building Control officer raise an in-principle objection to the proposed strategy, although both note that the approach deviates from standard guidance. This carries a risk that at Gateway Two that the strategy may not satisfy all the necessary requirements, and the layout would therefore need to be re-considered.
- 8.587 It is proposed to adopt a 'stay-put' evacuation strategy within the SOPH residential areas, with only the occupants of the apartment of fire origin evacuating. For the care areas in Block B, it is proposed to adopt a progressive horizontal evacuation strategy. The blocks will be provided with at least one dedicated evacuation lift associated with each stair core. The building would be provided with a sprinkler system throughout.
- 8.588 The main issue of contention is regarding the progressive horizontal evacuation of the care units and staircases serving a mix of uses, however these are detailed design matters which sit beyond the remit of Gateway One. At Gateway Two, detailed fire safety design and specifications must be submitted to the Building Safety Regulator, and Construction cannot begin until they are satisfied and issue a building control approval. The applicant will need to provide further justification and detail of the suggested approach to the HSE at Gateway Two. Occupation then cannot take place until Gateway Three. There are therefore sufficient safeguards in place to ensure that fire safety will be appropriately regulated, and the development has considered the matters required in relation to the London Plan and HSE requirements.

Health

- 8.589 The NPPF embeds the importance of strong, vibrant and healthy communities by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. It goes to state that decisions should aim to enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities. Local Plan Policy DM16 encourages healthy behaviours and lifestyles by requiring developments to ensure access to open spaces and facilities, promote active travel and physical activity, create spaces for social interaction and mitigate pollutants. This policy explains that Health Impact Assessment's (HIA) should detail how positive impacts have been maximised and how any negative impacts have been mitigated. This is supported by London Plan Policy GG3.
- 8.590 The submitted HIA reviews the demographics and health of Croydon, and where data is available Purley and Woodcote ward. It identifies that local practices are

currently operating above the recommended capacity level of 1 GP to 1,800 patients at a combined ratio of 1 GP to 1,988 patients. The HUDU (Healthy Urban Development Unit) model determines that the development would result in a likely population gain for Croydon of 245, although maximum development capacity is circa 370. All future residents will be over the age of 65, which is the age demographic that places the most demand and pressure on NHS infrastructure and services. The NHS has assessed the HIA and scheme as a whole and identified that a contribution of £228,000 would be required in this case to expand and reconfigure a number of local surgeries to meet the increased demand. This should be secured through the legal agreement.

8.591 The HUDU rapid HIA Tool recommends the assessment of potential health impacts under 11 topics or broad determinants, which the HIA has considered the development against. It notes that there would be no potential health impacts during construction subject to mitigation measures. Largely the health impacts at operation stage would be positive including meeting accessible design requirements, adaptable homes, meeting housing needs, providing a range of housing types, the layout of some units, energy efficiency, providing social infrastructure, shared community uses, providing new open, natural and multi-use space, meeting healthy streets indicators, encouraging walking and cycling, connecting public realm, connected to public transport, local services and facilities, reduces car use, provision provides for people with mobility problems, aims for design out crime, employment opportunities, potential supply of local food with farmers market, connects with existing and makes provision for community facilities, optimise use of existing land, encourages recycling, incorporate sustainable design and renewable energy, responds to the seasons, enhances biodiversity and incorporates SuDS. As noted above a negative will be the impact upon healthcare services which would be mitigated through a financial contribution. It should be noted that impacts to neighbouring properties, the scale of the proposal and poor quality of accommodation to some of the units were not addressed in their assessment.

8.592 Taking all of the above into account, it is considered that the proposed development would contribute towards positive health outcomes within the population.

8.593 Planning obligations and conditions are recommended to secure measures to avoid any potential for unacceptable health impacts, for example implementation of appropriate air quality mitigation measures during construction and the contribution to upgrade existing health care facilities. The development is also liable for a Community Infrastructure Levy (CIL) payment.

Employment and skills

8.594 Local Plan Policy SP3.14 sets out the Councils' approach to delivering local employment for development proposals. An employment and training strategy and contribution would be secured through a legal agreement to ensure the employment of local residents during construction.

8.595 A Socio-Economic Impact Assessment was submitted with the application. This sets out the proposal would potentially create between 87-116 jobs at the operation stage and up to 236 jobs at construction stage.

8.596 A financial contribution of £430,000 would be required to cover the Council's costs in the identification, initial pre-employment training and on-going skills development

and sustained employment for local people working in construction jobs on the development. This is based on a standard charge for training of £2,500 per £1 million of capital construction costs and would be secured through a legal agreement. A further operational contribution of £109,000 would be required.

Archaeology

- 8.597 As the site is within an Archaeological Priority Area an Archaeological Desk-Based Assessment was submitted with the application. The assessment notes that the site has been previously disturbed through the construction of the present leisure centre and car park. Further, the existing basement areas would be retained with disturbance only likely through additional piled foundations. It notes that there is potential for previously unknown archaeological assets dating to the post medieval period within the ground.
- 8.598 Paragraph 216 of the NPPF notes a balanced judgement to the scale of any harm or loss non-designated heritage assets, such as the potential archaeological interest of this site, must be taken.
- 8.599 Having reviewed the submitted assessment and other sources Historic England, noting the site is located within Tier IV (the lowest level of Archaeological Priority Area), consider the proposed development will not have a discernible archaeological remains impact and no further action is therefore required.

Telecommunications

- 8.600 London Plan Policy D9 states that tall buildings, including their construction, should not interfere with telecommunication. A Television/Radio Signal Survey and Reception Impact Assessment shall be secured by legal agreement with any potential adverse impact mitigated at the applicant's cost.

Temporary Impacts

- 8.601 The redevelopment of the site will result in the loss of the existing car park, without any re-provision during the construction phase. This is a temporary impact, and other car parking in the town centre would still be available. Conditions are recommended to secure a Demolition and construction logistics plan (including Dust Management Plan) and a Construction Environmental Management Plan to manage the impacts.
- 8.602 During the construction of the development, hoardings will be needed to keep the site safe and secure. A condition is recommended to secure details, ensuring that these minimise visual impacts on the town centre, take opportunities to maintain a tidy and attractive town centre environment, and minimise any access obstructions.

Equalities

- 8.603 The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It sets out the different ways in which it is unlawful to treat someone. The legislation requires local authorities to fulfil a public sector equality duty by considering the impact of policies and proposals on people with protected characteristics. London Plan Policy GG1 Building strong and inclusive communities sets out that good growth is inclusive growth. It sets out a series of requirements to ensure this. The NPPF, as well as Mayor's Accessible London: Achieving an

Inclusive Environment SPG and Mayor's Planning for Equality and Diversity on London SPG (2007) are also of relevance.

- 8.604 The applicant has covered different areas of equality within the DAS, HIA and the Socio-Economic Impact Assessment. The development proposes a number of measures that would improve inclusivity, including widening the pavement to Whytecliffe Road South, and providing a gentler gradient pedestrian route between Whytecliffe Road South and High Street with lifts to navigate the stepped change in levels. There would be a variety of unit types including range of M4 (3) wheelchair units, with the remaining units designed to meet M4 (2) with communal amenity spaces also designed to be accessible. There would be level access across the site and fire evacuation lifts are provided to ensure dignified emergency exit.
- 8.605 Within the public space, safety for all users is important.
- 8.606 The proposed leisure centre would have accessible toilets and a changing places toilet (larger accessible toilet for severely disabled people, with equipment such as hoists, curtains, adult-sized changing benches and space for carers). There will be a mix of changing room types including separate male and female facilities, group changing and family changing rooms. There would be a pool entry lift to the main pool and both pools will feature a moveable floor to allow pool depths to be set according to user group requirements. The pool viewing area would accommodate blinds for privacy when required. The studio is separate from the main gym so allows for private classes. The café and soft play are accessible directly from the foyer and allows people to use part of the centre without paid entry. Overall, the leisure centre provides a highly accessible facility with access for all.
- 8.607 Inevitably limiting the age of the occupants of the IRC to 65 and over does exclude a large portion of the population. Similarly, the restricted range of unit sizes would preclude multi-generational or extended families, although their needs can be met elsewhere, and the unit sizes have been designed to cater to their users' needs. Furthermore, the facility would potentially free-up other housing for younger residents and addresses the needs of an ageing population. By applying a condition which restricts users to 55+ the restrictive nature of the development is appropriately limited. Whilst the housing would be age restrictive, the proposed leisure centre would be available to various sections of the population, and the open space would not only be accessible to various users, but it would contain elements of play facilities to support a range of age groups.
- 8.608 The reduction in car parking would be significant and impact a large number of people. However, for some there is the alternative option of using more sustainable modes of transport to reach the town centre and for others there are alternative car parks. There would be three Blue Badge spaces outside the development for those less mobile.
- 8.609 A number of users of the future mosque would need to park further away than originally anticipated or use alternative modes of transport. However, the expectation is that the mosque will be encouraging their visitors to use sustainable modes of transport through their Travel Plan and encouraging those who choose to drive and are capable of walking longer distances to park further away thereby ensuring that there are spaces available within the proposed car park for those most in need. The existing multi-storey car park is not the only parking available to

visitors to the mosque, and they would not be discriminated against more than other groups as a result of the reduced car parking.

- 8.610 It is considered that the development proposals could have a negative impact on some protected groups, but only over a temporary period. There would be temporary negative impact on those living in the town centre, or requiring town centre parking, due to disruption during the construction phase which includes the temporary complete loss of car parking.
- 8.611 The proposed development is considered to have had due regard to inclusivity, diversity and equality, often improving the situation over the current status quo, with further mitigation measures recommended to be secured through condition to further reduce the likelihood or extent of impact of the development on individual protected groups where considered necessary. The proposed development meets the requirements of London Plan (2021) Policy GG1.

Financial Considerations and CIL

- 8.612 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that a local planning authority must have regard to local finance considerations as far as it is material.
- 8.613 The development would be liable for both Mayoral Community Infrastructure Levy (CIL) and Croydon CIL. The collection of CIL would contribute to provision of infrastructure to support the development including provisions, improvement, replacement, operation or maintenance of education facilities, health care facilities, and opens space, public sports and leisure, and community facilities. CIL payments can be phased so they come forward alongside the relevant phases of the development to avoid harming viability. A condition is recommended to facilitate this.
- 8.614 The officer recommendation is subject to several s.106 planning obligations as detailed within this report, which would mitigate the impacts of the development.
- 8.615 The proposed development includes the provision of a Council-run leisure centre. Whilst commercial discussions are separate to the planning application, the submitted viability appraisal assumes that the leisure centre will be provided to the Council at substantially less than its (estimated) ca.£19m construction cost. The provision of the leisure centre is a significant public benefit which weighs in favour of the proposed development, and the benefit of its delivery is considered to outweigh the limited amount of affordable housing. There will be financial review mechanisms within the s.106 agreement to ensure that should development viability change over time (for example the availability of new grant funding, changes in values, or a finalised commercial agreement between the Council and developer), any increased viability will be captured through an increased proportion of affordable housing.
- 8.616 The proposed development will result in the loss of a substantial amount of public car parking, and the associated parking income for the Council. The relevant values have been accounted for within the financial viability appraisal. As above, the development will require separate commercial negotiations with the Council as freeholder.

- 8.617 The proposed development includes public spaces which will require ongoing maintenance. These will be the responsibility of the developer, and whilst public access is to be secured through the s.106 agreement, the planning application will not result in a maintenance cost burden for the Council.
- 8.618 This report sets out several necessary financial contributions to be secured within the s.106 agreement. Whilst without these obligations the development the application would not be acceptable, the applicant's agreement to the s.106 obligations, and the requirement for the CIL payment, mean that the development is acceptable with regard to the relevant local finance considerations.

Human Rights

- 8.619 In making this recommendation, regard has been given to the provisions of the Human Rights Act 1998, particularly Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, and Article 8, which protects the right to respect for private and family life. Officers have balanced the applicant's reasonable development rights and expectations against the wider community interests, as expressed through third-party representations, the Development Plan, and the referenced Guidance.
- 8.620 Whilst some harm has been identified in this report, mostly due to the size of the development, the financial viability assessment has demonstrated that it would not be viable to deliver the same benefits with a lower quantum of development.
- 8.621 It is considered that any resultant interference with the rights of individuals is both necessary and proportionate in the context of securing the significant public benefits arising from the proposed leisure centre and associated regeneration.

9 CONCLUSION AND PLANNING BALANCE

- 9.1 The proposed development has been shaped through collaborative engagement, incorporating feedback from key stakeholders, including the Council's Design Review Panel and Planning Committee.
- 9.2 The principle of the proposed development is consistent with the site allocation, replacing the existing supermarket, leisure centre, and public car park with a new public car park, leisure centre, and residential accommodation, as set out in the site-specific allocation.
- 9.3 The development will deliver a modern purpose-built integrated retirement community, which has been assessed against guidance for design for older people. Whilst its design and location within an urban setting means some policy targets regarding daylight and aspect would not be achieved, it would provide homes which achieve space standard requirements, foster a sense of community, and provide its residents with a range of private and communal outdoor spaces. This, alongside the range of internal facilities and the range of facilities, services and transport links available within the town centre will result in an inclusive and well-designed community providing specialist housing for an ageing population and encouraging downsizers to free up larger homes elsewhere.
- 9.4 The new housing will positively contribute to the borough's housing land supply, and whilst the 10% affordable housing provision falls short of policy targets, it would

exceed the minimum requirements of the London Plan's viability tested route whilst also contributing to the delivery of a new leisure centre.

- 9.5 The provision of a new, modern leisure centre for Purley constitutes a significant public benefit. The new facility would provide a high-profile presence on the high street, and provide modern facilities including a new gym, studio, two swimming pools and a soft play area. These are proposed alongside a café which will allow overlooking of the training pool, soft play and the new public square. The leisure centre will also provide accessible WC and changing facilities and step-free access throughout, offering a high quality modern civic building for the local community.
- 9.6 The proposed public realm improvements, including a new public square and a pedestrian through route connecting Whytecliffe Road South and the High Street, will further enhance the town centre and deliver on the aspirations of the Purley Regeneration Framework.
- 9.7 The scheme incorporates significant planting across the site, resulting in a considerable net gain in biodiversity.
- 9.8 The reduction in public car parking, whilst not supported by objectors to the planning application, aligns with policies aimed at reducing car use and promoting the use of more sustainable transport modes. The impact on short-stay visitors to the town centre has been assessed through an evidence-based approach and would be mitigated through planning conditions and s.106 obligations.
- 9.9 The proposal encourages active and healthy lifestyles for both residents and the wider community.
- 9.10 The proposed leisure centre would exceed the minimum building regulations energy standards but fall short of the London Plan's more ambitious targets, and the IRC would be built to high sustainability standards and would surpass energy reduction targets and achieves a BREEAM Excellent rating. Those energy savings combined with a carbon offset payment would result in a carbon neutral development.
- 9.11 The development improves surface water flood performance and provides employment and training opportunities, with a proportion reserved for Croydon residents, alongside financial contributions to local infrastructure, including towards investment in local GP practices.
- 9.12 The following disbenefits weigh against the proposal:
- 9.13 While the provision of specialised older persons' housing (both independent living and extra care units) is generally supported, the proposed additional care units are not aligned with Croydon's Market Position Statement for Adult Social Care and Health, which indicates no desire to further extend the care market without addressing gaps in standard beds, complex needs, or respite provision. Given the care facility's position within an Integrated Retirement Community, and alongside the recommended s.106 obligations, this is considered only a minor policy conflict and as such the harm would be limited.
- 9.14 While certain aspects of the proposed development exhibit contextually responsive design and high architectural quality, the overall mass of the development, particularly Block B, would, in some views, dominate the town centre and negatively impact the setting of the Local Heritage Area and some locally listed buildings. The

design detailing and materials seek to reflect the local character alongside substantial new landscaping, urban greening, and open space, somewhat mitigating that harm. When considered against the existing buildings and public realm on the site, the development would ultimately deliver a much higher quality pedestrian experience, with new public spaces, landscaping, a safe and accessible route and passive surveillance, to some extent mitigating the harm caused.

- 9.15 The amenities of some surrounding properties would be negatively affected, particularly in relation to significant daylight and sunlight impacts.
- 9.16 The standard of accommodation is generally good, with most units meeting or exceeding minimum internal area standards and offering access to private and communal amenity space and good access to privacy. However, a significant number of single-aspect units, particularly those facing northeast and northwest, would experience very low levels of daylight.
- 9.17 The NPPF advises that planning permission should not usually be granted for applications that conflict with an up-to-date development plan. However, local planning authorities may make decisions that depart from an up-to-date development plan if material considerations indicate that the plan should not be followed.
- 9.18 In this finely balanced case, officers recognise that the scheme would provide features that align with the development plan and others which cause harm.
- 9.19 When considering the primary harms caused by the development, the massing of the development, the impacts on surrounding daylight, and limitations on internal daylighting and aspect, it is clear that these are caused by the size of the development in relation to its setting. The scheme's viability assessment makes it clear that the development would not be viable if reduced in scale, and as such it would not be viable to deliver the benefits without causing that harm. Therefore, the harm caused by the development is not unnecessary or without justification.
- 9.20 As explained above, that massing would result in enabling development which would offer significant public benefits. Most significantly, the provision of a new leisure centre, and the regeneration of the town centre with the new public square and pedestrian through route. These benefits would substantially benefit the local community and are unlikely to come forward without a deliverable redevelopment proposal at this key town centre site. As such, these benefits provide justification for the harm identified in this report.
- 9.21 In addition to those benefits, the scheme would deliver additional benefits, including the delivery of the new housing within new IRC and affordable housing, both of which would contribute positively to addressing the shortage of specialist, market and affordable housing. The inclusion of these means that the overall package of benefits can be considered to outweigh the identified harms.
- 9.22 Section 38 (6) of the Town and Country Planning Act requires that the development be assessed against the development plan as a whole, considering all relevant material planning considerations.
- 9.23 While the decision is finely balanced, it is considered that the identified harms would be both justified and outweighed by the benefits. Therefore, the proposal is

recommended for approval subject to the proposed conditions and a Section 106 agreement.

- 9.24 This report summarises the officer assessment, providing detail proportionate to the complexity of the matters involved.
- 9.25 All relevant policies and considerations, including statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Considering the scheme's consistency with the Development Plan and weighing this against all other material planning considerations, the proposal is deemed acceptable in planning terms, subject to the detailed recommendation in Section 2 (RECOMMENDATION).

APPENDIX 1: Drawing numbers

Existing plans	
A2103-ASA-ZZ-00-DR-A-0100 P02	Existing Location Plan
A2103-ASA-ZZ-00-DR-A-0101 P02	Existing Site Topographical Plan
Existing floor plans	
A2103-ASA-ZZ-00-DR-A-0102 P02	Existing Plan _Ground Floor
A2103-ASA-ZZ-00-DR-A-0103 P02	Existing Plan _First Floor
A2103-ASA-ZZ-00-DR-A-0104 P02	Existing Plan _Second Floor Car Park Level 1-2
A2103-ASA-ZZ-00-DR-A-0105 P02	Existing Plan _Third Floor Car Park Level 3-4
A2103-ASA-ZZ-00-DR-A-0106 P02	Existing Plan _Fourth Floor Car Park Level 5-6
A2103-ASA-ZZ-00-DR-A-0107 P02	Existing Plan _Roof Plan
A2103-ASA-ZZ-00-DR-A-0110 P02	Demolition Ground Floor Plan
A2103-ASA-ZZ-00-DR-A-0111 P02	Demolition First Floor Plan
A2103-ASA-ZZ-00-DR-A-0112 P02	Demolition Second Floor Plan
A2103-ASA-ZZ-00-DR-A-0113 P02	Demolition Third Floor Plan
A2103-ASA-ZZ-00-DR-A-0114 P02	Demolition Fourth Floor plan
A2103-ASA-ZZ-00-DR-A-0115 P02	Demolition Roof plan
Existing sections and elevations	
A2103-ASA-ZZ-00-DR-A-0120 P02	Existing Site Section AA/BB/CC
A2103-ASA-ZZ-00-DR-A-0130 P02	Existing Site Elevation WCRS
A2103-ASA-ZZ-00-DR-A-0131 P02	Existing Site Elevation High Street
Block plan	
A2103-ASA-ZZ-ZZ-DR-A-0150 P03	Proposed Block Plan
Floor plans	
A2103-ASA-ZZ-B1-DR-A-0200 P03	Basement Level
A2103-ASA-ZZ-LG-DR-A-0201 P03	Lower Ground Floor Level
A2103-ASA-ZZ-M1-DR-A-0202 P03	Mezzanine Level
A2103-ASA-ZZ-UG-DR-A-0203 P03	Upper Ground Floor Level
A2103-ASA-ZZ-01-DR-A-0204 P03	Level 01
A2103-ASA-ZZ-02-DR-A-0205 P03	Level 02
A2103-ASA-ZZ-03-DR-A-0206 P03	Level 03
A2103-ASA-ZZ-04-DR-A-0207 P03	Level 04
A2103-ASA-ZZ-05-DR-A-0208 P03	Level 05
A2103-ASA-ZZ-06-DR-A-0209 P03	Level 06
A2103-ASA-ZZ-07-DR-A-0210 P03	Level 07
A2103-ASA-ZZ-08-DR-A-0211 P03	Level 08
A2103-ASA-ZZ-09-DR-A-0212 P03	Level 09
A2103-ASA-ZZ-10-DR-A-0213 P03	Level 10
A2103-ASA-ZZ-11-DR-A-0214 P03	Level 11
A2103-ASA-ZZ-RF-DR-A-0215 P03	Level 12
Sections	
A2103-ASA-ZZ-AA-DR-A-0300 P03	Section AA
A2103-ASA-ZZ-BB-DR-A-0301 P03	Section BB
A2103-ASA-ZZ-CC-DR-A-0302 P03	Section CC
A2103-ASA-ZZ-DD-DR-A-0303 P03	Section DD

Elevations	
A2103-ASA-ZZ-NE-DR-A-0400 P03	North East Elevation
A2103-ASA-ZZ-SE-DR-A-0401 P03	South East Elevation
A2103-ASA-ZZ-WO-DR-A-0402 P03	West Elevation
A2103-ASA-ZZ-SW-DR-A-0403 P03	South West Elevation
A2103-ASA-BA-BA-DR-A-0404 P03	Building A Elevations
A2103-ASA-BB-BB-DR-A-0405 P03	Building B Elevations
A2103-ASA-ZZ-ZZ-DR-A-0406 P03	Building C & D Elevations
Bay Studies	
A2103-ASA-BA-ZZ-DR-A-0450 P03	Bay Study 01 - Building A Typical Lower
A2103-ASA-BA-ZZ-DR-A-0451 P03	Bay Study 02 - Building A Typical Upper
A2103-ASA-BB-ZZ-DR-A-0452 P03	Bay Study 03 - Building B Typical Lower (Public Realm)
A2103-ASA-BB-ZZ-DR-A-0453 P03	Bay Study 04 - Building B Middle
A2103-ASA-BB-ZZ-DR-A-0454 P03	Bay Study 05 - Building B Typical Top
A2103-ASA-BB-ZZ-DR-A-0455 P03	Bay Study 06 - Building B Leisure Centre Entrance
A2103-ASA-BC-ZZ-DR-A-0456 P03	Bay Study 07 - Building C Typical Lower
A2103-ASA-BC-ZZ-DR-A-0457 P03	Bay Study 08 - Building C Typical Middle
A2103-ASA-BC-ZZ-DR-A-0458 P03	Bay Study 09 - Building C Typical Top
A2103-ASA-BD-ZZ-DR-A-0459 P03	Bay Study 10 - Building D Typical Lower
A2103-ASA-BD-ZZ-DR-A-0460 P03	Bay Study 11 - Building D Typical Middle/Upper
Leisure Centre	
2307-LAA-LF-B1-DR-A-02100 P02	Leisure Facility - Basement
2307-LAA-LF-00-DR-A-02101 P15	Leisure Facility - Ground Floor
2307-LAA-LF-M1-DR-A-02102 P04	Leisure Facility - Mezzanine GA

APPENDIX 2: BRE 2022 Daylight/sunlight 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 “NSL test” (no sky line).

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.

Daylight to new buildings

The vertical sky component (see above) may be used to calculate daylight into new buildings.

For daylight provision in buildings, BS EN 17037 provides two methodologies. One is based on target illuminances from daylight to be achieved over specified fractions of the reference plane for at least half of the daylight hours in a typical year. One of the methodologies that can be used to interrogate this data is Spatial Daylight Autonomy (sDA).

The Spatial Daylight Autonomy (sDA) seeks to establish how often each point of a room's task area sees illuminance levels at or above a specific threshold. BS EN 17037 sets out minimum illuminance levels (300lx) that should be exceeded over 50% of the space for more than half of the daylight hours in the year. The National Annex suggest targets comparable with the previous recommendations for Average Daylight Factor (ADF). The targets considered relevant for this application are:

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for living/kitchen/diners, kitchens, and studios.

Paragraph C17 of the BRE states that *“Where a room has a shared use, the highest target should apply. For example in a bed sitting room in student accommodation, the value for a living room should be used if students would often spend time in their rooms during the day. Local authorities could use discretion here. For example, the target for a living room could*

be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design”.

Sunlight to new buildings

The BRE guidelines state that in general, a dwelling or non-domestic building which has a particular requirement for sunlight, will appear reasonably sunlit provided that:

- At least one main window faces within 90 degrees of due south, and
- a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s); sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.

Sunlight to gardens and outdoor spaces

The BRE guidelines look at the proportion of an amenity area that received at least 2 hours of sun on 21st March. For amenity to be considered well sunlight through the year, it stipulates that at least 50% of the space should enjoy these 2 hours of direct sunlight on 21st March.