

Mr Pete Smith  
Head of Development Management,  
Place Department  
London Borough of Croydon,  
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8 Mint Walk,  
Croydon, CR0 1EA

By e-mail from;  
Riddlesdown Residents' Association  
(Riddlesdownresidents@gmail.com)

9 July 2016

Dear Mr Smith

**MOSAIC PLACE, PURLEY Application No 16/02994/P**

We the undersigned members of the seven Residents' Associations (Riddlesdown, Hartley & District, Kenley & District, Sanderstead, Old Coulsdon, Coulsdon West, and East Coulsdon) and abutting Purley Town Centre, lodge our objections to the above application.

We set out our reasons why, below:

1. The developer has presented no Design & Access Statement with the planning application. There is only a Planning Statement. This is required to gather a clear overview of this development.
2. The scheme at 717 habitable rooms per hectare (hrh), is beyond the density range in the London Plan density matrix which identifies "urban" areas with a PTAL score of 4-6, as being appropriate for schemes between 200 -700 hrh. Reflecting this, the scheme does not present convincing evidence that it represents an appropriate configuration in terms of scale, massing and layout given the existing Purley townscape.
3. Croydon Council's Local Plan Strategic Policies (CLP1) supports regeneration of the **Purley District Centre (PDC)** and identifies the sites as appropriate for a comprehensive mixed use scheme. CLP preferred and an alternative option (draft November 2015) supports landmark buildings of up to 16 storeys but has limited weight given it is a consultation document.
4. The key issue with this proposal is whether it represents an appropriate use of both sites given their location and significance in terms of the future regeneration of **PDC** and the wider locality. For example, does Purley need "landmark" buildings? What is the evidence that these would make a positive contribution in terms of economic benefits and the long term regeneration of **PDC**? Why are the landmark buildings considered to be the most appropriate form of development for both sites?
5. Linked to the above, how will the proposal provide a "gateway" to **PDC** in terms of improved accessibility? How will it increase the viability and vitality of **PDC**, particularly given the impact that the existing Tesco development has had on Purley? Rather than using the town centre, we believe that residents of the scheme are more likely to use public transport to travel to Croydon, London and the south coast etc.

6. It is accepted the proposal could potentially make a significant contribution to Purley's housing needs. The question is whether it represents the optimum configuration in terms of scale, massing and layout given the nature of both sites on the edge of the **PDC**.
7. Both sites could potentially make a significant contribution to housing needs in the area. The level of affordable housing at 18% (39 units) is low in terms of the total of 220 residential units proposed, the existing need for affordable housing across the housing market area and current residential land values. The proposal states that mitigating factors for the level of affordable housing provision include the need for high quality design and construction, abnormal housing and financing costs and the provision of church/community facilities. It is not clear how these factors, even when considered together, account for the low level of affordable housing proposed. As the proposal represents a key regeneration opportunity for Purley, there needs to be greater transparency as to why higher levels of affordable housing cannot be provided, particularly when considered against CLP1's target of negotiating up to 50% affordable housing on residential schemes.
8. Flooding – the proposed sites are on the edge of the Environment Agency's Zones 2 & 3 Flood Risk map in Purley town centre. The proposals have the potential to increase surface run off in an area already experiencing severe significant flash flooding and drainage issues. The site is also within 100 metres of the Caterham Bourne, which is prone to periodic extensive flooding, the last significant occasion being in February 2014. There are no soakaways on the sites, only surface water (sw) drainage into Banstead Rd (450mm dia sw drain) via two on site sw storage tanks (210m<sup>3</sup>) on the island site and one on site sw storage tank on the south site (170 m<sup>3</sup>) limiting flow at 5 litres/sec into the sw drains. Will this put additional pressure on already well used existing sw drains and create more flooding? Will the existing nearby foul water sewers cope with all these additional residential units and community facilities?
9. The proposed development will be a phased construction and is expected to take at least 47 months to complete. This construction period will have a significant effect on traffic, on both the major routes of the A23 (which passes between the two sites) and also the A22, which converges on Purley Cross.
10. Such a massive development on the island site will prevent future strategic modification of the Purley Cross gyratory system and an improved solution for managing the ever growing volume of traffic passing through the Borough, via the Purley crossroads, from Junctions 6 (A22) & 7 (A23) of the M25. Any future redesign of the A23 & A22 Purley Cross junction could now be thrown into doubt because of this development, as TfL will not CPO a new development. Should the Westfield Development also take place soon in central Croydon, then this will no doubt have a potential major impact on Purley Cross and add to what is an already congested part of the South London road network (i.e. the A235, A23/A22 network to and from the M25 & M23). What are the views and policies of both Croydon Council and TfL on highway improvements to benefit the traffic flow at this Purley Cross junction and the environment of Purley Town Centre, prior to possibly granting approval?

11. Non-compliance with Croydon Local Plan Places of Croydon – Policy SP 7 – Purley: items 7.57 to 7.60. “Retaining and respecting local heritage, character and distinctiveness”. The exterior fenestration proposed is considered to look like a “bog-standard” design style of urban mass development, so typical of the 1970’s property boom era. There is absolutely no harmonisation of aesthetic external design in terms of detailing or styling to provide any of the local contextual qualities the CLP requires. The elements of the building conceived to be around 4 storeys high should be positioned at the Brighton Road frontage and styled to reflect (not copy) the fine looking early 20<sup>th</sup> century parades. The highest 17 storey building should be set back nearer to the existing Baptist Church building to reduce their visual impact on the local heritage and character of Purley. This is an elementary rule in architectural design and good town planning, which has, very strangely, been disregarded here.
  
12. Car Parking: Inadequate residents parking provision for 220 units on both sites, is a major deficiency. There should be recognition that despite the excellent and convenient bus and rail services in Purley, there can be no restrictions on residents desiring to own and use cars for domestic and business purposes, despite a lack of parking facilities within their development. The consequences of not providing additional car parking capacity within a major development for the benefit of both residents and the district centre, will result in serious negative factors for Purley and surrounding area. Also the proposal for only 50 parking spaces for the Church and community use, which will have an auditorium to accommodate 500 people, will put pressure on already well used public carparks nearby, as well as nearby residential on street parking. Banstead Rd (A23) in particular is already heavily parked on Sundays and causes traffic hindrance because there is no red route parking restriction on this day. There are no visitor car bays which will prohibit emergency parking for doctor, care workers and other medical staff to visit. Whilst one large vehicle is parked in the limited area of the entrance it would prevent other vehicles from entry because of the need to use all the available space to reverse in the turning head to egress the building. There is only the one space available for an ambulance, removal or delivery vehicles, which would need to take turns to deliver. There are also very few on street parking bays in Banstead Rd for deliveries. Should the limited parking be approved from the island site (church & flats), vehicles will be exiting the site into Russell Hill Rd and will have to turn right into three lanes of traffic already stacking for the traffic lights on Brighton Rd. If site traffic wishes to go along the A22 (southbound) then it will have to cross at least one lane, if not two lanes, in order to be able to proceed straight on at the second and third set of traffic lights. There is very little option for drivers to ensure they get into the correct lane before the traffic lights on Russell Hill Rd. Is this safe and will it increase risks of accidents at this location? In addition, vehicles, (in particular lorries) whilst stacking to exit the island site and waiting for the traffic lights to turn green, will be a hindrance to pedestrians, wheel chair users, and parents with buggies etc, walking on that side of the footway!
  
13. Overshadowing Effect: Though the submission includes hourly approximate shadow plans relative to surrounding buildings and streets, these understate the true impact of the lack of direct sunlight into the existing district centre. They show only the hours between 8 a.m. and 4 p.m. on 21 March (Springtime), a week before British Summer Time starts. The biggest shadowing period in summer months would occur from early afternoon in Russell Hill Road and mid-afternoon across the main Brighton Road parades and later afternoon in Purley Road (Godstone Road) across the pedestrian

underpass amenity areas in front of Tesco's and the Jolly Farmers public house. The effect of darkening the streets in the town will have an adverse subliminal effect on pedestrians and be further deterrent effect on shoppers and diners.

14. The "South Site" Block, 1-9 Banstead Road fronting Brighton Road: Scale, Massing and Design Appearance. The massing of this large "square block" 7 to 8 storeys to Brighton Road reducing down to 4-5 storeys facing Banstead Road is just over-large and out of scale, motivated by maximising the end capital value with quantity over quality. The proposed rather blank, flat facades do not respect or harmonise with the long established street scene, which the CLP expressly requires. As proposed, this development is not an attractive addition to Purley.
15. The excessively high density of the island scheme, 114 dwellings on an area of 0.86 hectare, built on a very restricted site is a major factor in the serious disadvantages of the development.
16. The term "Landmark" indicates a prestigious building set on a site with adequate room to achieve an architectural presence. The building is cramped, built to the back edge of the pavement and would over dominate the nearby, three to four storey shopping area. The main entrance is positioned on the corner of Russell Hill Road and the Brighton Road with its constant heavy and noisy traffic.

We trust the Council will consider these objections and comments and refuse the application as it stands. The Riddlesdown RA as a registered Residents' Association would ask that if Officers are recommending for approval, and if it hasn't been done already, that the application is referred to the Planning Committee.

Yours sincerely,

*Phil Thomas*

Phil Thomas - Riddlesdown RA

*Brian Longman*

Brian Longman – Riddlesdown RA

*Dennis King*

Dennis King - Sanderstead RA

*Rita Barfoot*

Rita Barfoot – Coulsdon West RA

*Diane Hearne*

Diane Hearne – Hartley & District RA

*Chris Stanley*

Chris Stanley – Kenley & District RA

*Jan Stollery*

Jan Stollery – Old Coulsdon RA

*Charles King*

Charles King – East Coulsdon RA