

## **Opening Statement and Case by the Rule 6 Party**

The four of sitting us here as the Rule 6 Party are representing seven local Residents' Associations in Purley, all of Coulsdon, Kenley, and Sanderstead, who have come together as one to raise concerns about this proposal for the Purley District Centre (PDC).

As a group, the RAs are closely located to Purley town centre, many of our residents have Purley postal addresses and we represent a combined total of about 15,000 households in the locality of Purley, Sanderstead, Kenley and all of Coulsdon.

As representatives of local residents, the RAs are not opposed to new development, as we understand that growth will be key to the future vitality and viability of suburban District Centres like Purley. The RAs recognise the acute housing needs in the area and wish to see more new homes that are genuinely affordable provided for local people and we are not anti-development. We support new development that has a positive impact on the area's urban environment, public realm and provides social and economic benefits to the wider community.

The RAs are also aware there is a petition with 9,211 responses, of which 95.44% oppose the scheme and 4.56% are in favour. So it is obvious there is large local public opposition to this scheme and in particular a 17 storey tower for the town centre. And these objections are still being submitted, with many further written objections being received by the Planning Inspectorate in the last few days.

The Rule 6 Party believe this proposed scheme raises three key interrelated planning issues;

- I. The significant long-term impact on economic growth and meeting housing needs across a wider area than a single local authority;
- II. Have significant effects beyond the immediate locality;
- III. Raises significant architectural and urban design issues;

which, when considered together, demonstrate that the proposal will have an unacceptably harmful impact upon the Purley District Centre.

Both sites are key regeneration opportunities for the PDC and the broader urban area which are critical to the future development of Purley. As proposed, the scheme does not clearly demonstrate its potential long term economic impact or regeneration benefits.

It is not clear what the environmental, economic and social benefits and impacts of the scheme will be for the PDC and the broader urban area. For example, traffic congestion is already an issue in respect to Purley Cross and the four-year construction period for the scheme is likely to have a significant impact on all the major trunk roads in and beyond Purley, in terms of increased traffic.

The RAs have held two meetings in June and October 2019 with representatives from the Purley Baptist Church and the developer Thornsett, to try to take forward and progress matters and keep the length of this Inquiry to the minimum. We all believe it is in our interests that these sites do not remain vacant and dormant for longer than is necessary and to the detriment of Purley District Centre.

We have now agreed a number of matters previously in dispute with them and, to assist the Inspector, we set out below issues that were considered at the previous Inquiry but are not matters of dispute between the parties:

1. The parties agree that the proposed 220 units would make a significant contribution to Croydon's housing stock, at these two highly sustainable location sites and they are suited to a residential - led mixed use development.
2. The principle of development on the Island Site for the Church, community facilities, retail space, and residential development is supported by all three parties. It is also agreed that the redevelopment of the long term vacant, highly prominent Island Site in Purley is long overdue.
3. The principle of development for housing on the 'South Site' is agreed by all parties. No issues are raised in relation to the proposed design and layout of the South Site.
4. No issues are raised on relation to the quantum of affordable housing to be secured.

Following the technical advice submitted at the last Inquiry we have dropped our objection about flooding of the sites, in particular of the island site and also the surface water run off to these sites which could cause local surface water flooding. However, we are not totally convinced that flooding will not occur to and near to the tower site and we still have reservations about this issue.

We have also dropped our objection about the insufficient on site parking because of the new and impending London Plan but we believe the lack of on site parking for both sites will create huge issues for local residents in nearby streets and also shoppers in the nearby public car parks.

However the Rule 6 Party are still of the view that there are still a number of matters of dispute.

These are:

1. Effect of the Proposals on the Character and Appearance of the Area;
2. Tall and Landmark Buildings, Height of the Tower and Wind Conditions and Top of the Tower Design.  
The Rule 6 Party does not agree that some of the residential units should be housed within a 17 storey tower. We consider the units should be spread over both sites, without the need for a 17 storey tower;
3. Consistency with Development Plan policies;
4. Impact on Heritage Assets, in Particular to the Brighton Road Frontage;
5. Vehicular Access/Exit to and from Russell Hill Rd on the Island Site and On Street Parking;
6. Air Quality – principally in relation to the previous point, associated air quality with traffic movements to and from the island site;
7. Traffic congestion in PDC and Transport links.

We will elaborate on the points referred to above as we present our case.

That concludes the opening statement of the Rule 6 Party.

## **CASE FOR THE RULE 6 PARTY**

### **1. Effect of the Proposals on the Character and Appearance of the Area**

In paragraph 11.158 of the Croydon Local Plan 2018 CLP1 – “The Places of Croydon” – Purley: - “Character, Heritage and Design” states;

*“11.158 - New development will respect the existing local character and distinctiveness of Purley, referring to the Borough Character Appraisal to inform design quality, with opportunities for public realm improvements primarily focussing on the District Centre whilst seeking to improve links to open space. Any buildings and conversions should be of a high standard of design to ensure the character of the Centre and the Conservation Area are respected.”*

We believe there is absolutely no harmonisation of the aesthetic external design in terms of detailing or styling so that it respects the local character and distinctiveness of Purley as required by paragraph 11.158 in the CLP 2018. It would have been more appropriate in terms of massing if the elements of the building conceived to be around 4 storeys high were positioned along the Brighton Road frontage and styled to reflect and not copy, the distinctive fine looking early 20th century parades further along the Brighton Road in the district centre.

### **2. Tall and Landmark Buildings, Height of the Tower and Wind Conditions and Top of the Tower Design**

- **Tall and Landmark Buildings**

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 regeneration of PDC and the wider locality. In this respect, we do not believe that sufficient robust evidence has been presented in respect to:

1. Does Purley need “landmark” buildings from an environmental, economic or social perspective?
2. What is the evidence that a tall “landmark” building would make a positive contribution in terms of economic benefits and the long-term regeneration of PDC?

3. Why are tall “landmark” buildings considered to be the most appropriate form of development for both sites?
4. How will the proposal provide a “gateway” to PDC in terms of improved connectivity and accessibility?
5. How will it increase the viability and vitality of PDC, particularly given the negative impact that the existing Tesco development has had on the district centre?

The proposal does not present convincing evidence as to why the “landmark” building as proposed at 17 storeys is appropriate, particularly given their size and massing in relation to the existing Purley townscape. In particular, it is not clear how the proposal will form a positive relationship with the form and character of surrounding buildings in the PDC or indeed how it will enhance the public realm (including landscape features) at street level.

We believe it is vital that this site, given its strategic location in Purley, is appropriately developed both in terms of the mix of uses and the physical form of development. Our concern is that it will undermine the viability and vitality of PDC and actually prevent regeneration of the area by further exacerbating the negative impact that the Tesco’s development has had on the range and quality of shops in the district centre.

Croydon Council’s Local Plan Strategic Policies (CLP1) 2018 supports regeneration of the Purley District Centre (PDC) and identifies both sites as appropriate for a comprehensive mixed-use scheme.

DM42.1 of the CLP 2018 supports a new landmark building of up to 16 storeys - DM42.1(b) but the Plan gives no indication of the exact location of this landmark building in Purley.

The principle of a comprehensive mixed-use development on this site is accepted and supported by the seven RAs. There is a recognised need for an appropriate scheme given that this is a significant development opportunity for Purley reflecting the site’s highly accessible location. However, it is not accepted by the RAs, nor does the proposal provide evidence, that Purley requires a tall building of this scale. The size and massing is inappropriate in terms of having a negative impact on Purley’s urban environment and streetscape.

The RAs are of the opinion that the proposed tall building is not in accordance with the current London Plan and in particular Policy 7.7. We are aware this Plan will be superseded early next year by the new London Plan and Policy D8 – tall buildings.

However, the Current London Plan states in:

*7.7A: Strategic “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.”*

We believe this proposal will have an unacceptably harmful impact on the PDC and the surrounding townscape by virtue of it being at least 5 times higher than the immediate and surrounding buildings in the district centre. The 17 storey tower will be at least twice as high as the proposed development on the south site and, in our view, will have a detrimental impact through its lack of legibility and positive relationship with the PDC. The tower will not enhance the skyline, rather it will fragment the townscape through its bulky and dominant appearance. Moreover, the design and materials proposed do not enhance Purley and its skyline, they appear incongruous and do not seek to form a positive relationship with the townscape. The tower feels ‘imposed’ upon the area reflecting the lack of architectural or design relationship with the surrounding environment.

*7.7C “Tall and Large buildings should:*

*(b) only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building.”*

We believe the 17 storey tower, would have a detrimental effect upon the PDC and wider urban environment by virtue of its bulk, scale and massing. Given the nature and location particularly its relationship to the PDC, we believe that a more sensitive and considered approach is required where the scale, massing and size of any buildings do not detract from, and overly dominate, the PDC and immediate environment as this proposal does. .

*7.7C “Tall and Large buildings should:*

*(c) relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;”*

For the reasons given above, we do not believe that these proposals seek to form a positive relationship with the PDC, principally the Victorian shopping parades. The bulk and massing of the buildings proposed mean that they will dominate the townscape and skyline, which is exacerbated by the lack of any architectural rhythm or shared detailing. The contrast between the proposed development and the existing urban grain is jarring rather than striking reflecting the lack of any positive relationship between the proposal and the PDC. In addition, we believe that for tall buildings to function best and sit within an urban environment, they require public open space at ground level

with good connectivity to and with the surrounding uses, both of which this proposal fails to provide given the tight, restricted nature of both sites.

*7.25 “Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor. Whilst high density does not need to imply high rise, tall and large buildings can form part of a strategic approach to meeting the regeneration and economic development goals laid out in the London Plan, particularly in order to make optimal use of the capacity of sites with high levels of public transport accessibility. However, they can also have a significant detrimental impact on local character. Therefore, they should be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations, are able to enhance the qualities of their immediate and wider settings, or if they make a significant contribution to local regeneration.”*

The term ‘landmark’ implies a prestigious building set on a site with adequate room to achieve an architectural presence. The building as proposed, is cramped, built up to the site boundary and would dominate the nearby three to four storey shopping parade in the PDC. The main entrance would be inappropriately located on the corner of Russell Hill Road and the Brighton Road, given the constant heavy and noisy traffic. We also have serious reservations about balconies immediately abutting the adopted highway and footways and items dropping down or thrown onto pedestrians and vehicles below.

*7.27 “The location of a tall or large building, its alignment, spacing, height, bulk, massing and design quality should identify with and emphasise a point of civic or visual significance over the whole area from which it will be visible. Ideally, tall buildings should form part of a cohesive building group that enhances the skyline and improves the legibility of the area, ensuring tall and large buildings are attractive city elements that contribute positively to the image and built environment of London.”*

The massing of the proposal in relation to the South site which as proposed, will be 7 to 8 storeys on Brighton Road, reducing down to 4 to 5 storeys facing Banstead Road and will be out of scale with the PDC whilst the blank, flat facades do not respect the local character, which the CLP DM15 expressly requires.

The Council say in the Officer’s report; we quote - *“The London Plan encourages proposals for tall buildings in town centres which have good access to public transport; accordingly the principle of a tall building is acceptable. CLP1 policy SP4.5 also encourages tall buildings in District Centres where there is well-connected public transport. At 17 storeys, the*

*tower would be distinctly taller than the surrounding built form and would make a significant change to the townscape, visible from many vantage points.”*

A tall ‘landmark’ building requires space to achieve an architectural presence. The 17 storey tower is confined to a very restricted site and is therefore cramped for space making it over dominant and completely out of scale with the PDC.

- **Height of the Tower**

There is no actual reference in the Agent’s Planning statement, or on the application form, in the Planning Officer’s Committee report in December 2016, or in the last Inspectors report what the actual height of this tall building will be, facing and looking at it on the Brighton Road elevation.

Internal heights of each storey can vary and constant reference is made to a tall, landmark building and 17 storeys in height, but there is no actual indication as to what the height will be. With the campanile appearing to extend above the 17th floor, the height could actually be equivalent to an 18 storey (or more) building.

Perhaps, more importantly in light of the Grenfell tower tragedy, will the London Fire Brigade be able to access all the exterior of the building with their hydraulic ladders in a safe and orderly manner bearing in mind this tower will be built right on the junction of three very busy roads. Any fire incident in the tower will also cause major disruption to traffic in and around the PDC, with road closures.

- **Wind Conditions and Top of the Tower Design**

The LPA say in their report *“London Plan Policy 7.7 states that tall buildings should not have an unacceptable harmful impact on their surroundings and should not adversely affect micro climate or wind turbulence.”* The RAs are of the view, regardless of the computer module predictions, that significant wind tunnels will be created in surrounding streets and in particular on Banstead Rd and Brighton Rd, below the proposed tall buildings. We believe this will be particularly bad in gale force winds, in whichever direction the wind is blowing. This could cause considerable inconvenience and danger for pedestrian and high sided HGV’s.

It is also noted that pine trees/conifers will be planted at high level of the ‘landmark’ building. There is no shelter at this height, from surrounding buildings. Is this wise and safe for pedestrians and vehicles and other nearby

properties, with the risk of the trees being uprooted or branches being snapped off and blown over the side of the building, in gale force winds onto two major roads and footways? Whilst the applicant has advised at the previous Inquiry that the trees will be wired and bolted to the structure, there is still a health and safety risk that any debris, or branches from the trees will in high winds be blown into the streets below the tower causing possible damage or injury (or even a fatality) to the public. Is this a risk worth taking?

The RAs do have particular reservations about the top portion of the tower. To reinforce this point Lewis White, a Purley Landscape Architect, who spoke at the last Inquiry has made this public observation in July 2019 to the online publication "Inside Croydon."

The Rule 6 Party do have his permission to reproduce this opinion;

We are quoting him;

*"I am totally in favour of the architectural quality of the design, which features attractive brickwork, excellent detailing, and good-quality fine concrete expressed framing to the main block, which will all weather well, totally avoiding the problem evident around the borough with "rendering" and "timber cladding" surfaces – which look grubby after just a few years.*

*The architects have taken the trouble, in my opinion, to step down the height of the blocks along Banstead Road and Brighton Road to the Coulsdon side, to meet the lower buildings adjoining the redevelopment area. This is architectural "good manners" and should be applauded.*

*The sticking point in my opinion, is not so much the height of the main block, it is far more about the weird cage-like design of the top.*

*A close inspection of the design will show a "top" comprising of tall vertical fins, topped with a horizontal bar, forming a portal rather like a thinner version of Stonehenge. The strong vertical emphasis makes the tower look far, far higher than it really is.*

*It looks to me like a cage– a hamster or old-style circus animal cage. And a ludicrously tall cage.*

*Inside the cage lurks a penthouse, probably containing lift rooms and water tanks, plus some penthouse flats. Plus a "landscape in the sky feature," some pine trees in a narrow bed around the perimeter, with the trees glimpsed between the gaps in the portal frame, like exhibits or prisoners. An architectural or landscape design "bright idea", which no doubt will have been marketed as "taking the trees from the ground into the sky!"*

*The idea started off, as shown in most of the original artist impressions, with something much more abundant – big, bright green, egg-shaped trees. I saw some photos in the background documentation showing a real Italian Renaissance tower topped with trees. Fine, perhaps, for Italy, but not likely to survive the English winter winds. These big green eggs would have either blown away and landed in the street below, or lost branches in the wind.*

*No doubt, someone in the landscape design team did a reality check to find out what types of trees could survive in the UK climate at such a height, with high winds focused between the portals.*

*The submitted drawings for the last Inquiry showed pine trees, much more realistic and probably about the only trees able to survive drying, cold winds in the Purley winter. If they survive, they would probably end up as giant bonsai trees, wind pruned. No guarantees can be given. It might be a total flop. They might end up as gaunt pine skeletons.*

*They will look rather dark and rather non-abundant in terms of greenery. Which is a far cry in design terms from the big blobby bright green trees of the proposals. Misleading too, which in my view is wrong, as the public really depend on the accuracy and honesty of such architect drawings.*

*I had the good fortune to be able to speak at the Inquiry and 15 minutes to present my views to the Inspector. I mentioned to him that the simple fact is that the block is not really a very tall block. It is the design of the top that makes it look much taller than it is. It looks industrial and harsh, not elegant. Very unlike other portal frames at the top of real tower blocks such as Lunar House in Croydon, which are not backed by dark-glazed penthouse floors, but show up against the sky like an aerofoil.*

*In my considered view, as someone who thinks constantly about landscape and architecture, and the scale of what looks right or wrong, the truth in this case is simple and blindingly obvious – for goodness sake, can the developer and architect please just get rid of the penthouse top floor and the ugly cage-like portal frame on top, and the prisoner trees? Set them free, plant them in the ground, or indeed, have green roofs on the many lower blocks in the development, where trees and green roofs would be welcome and have a nice, smaller parapet to the feature tall block. It will then look far smaller and lower. I think it would not look “in your face” or demand attention, or dominate the surrounding streets. It would be quite acceptable to look at.*

*Yes, and just two normal storeys lower than the current building. Surely that would be viable in terms of developed units?” End quote.*

The Rule 6 Party fully endorse Mr White's points about the design of the top storeys and the “cage-like structure” and its stark and industrial appearance

and his conclusions that its impact on Purley would be destructive and that the structure should be removed. We agree the design at the top of the tower should be amended on the lines he suggests.

Whilst the RAs would wish to see more than just two storeys removed, in order to reduce the height and looming impact of the current proposal, we would also endorse his suggestion about adding green roofs to the lower blocks. That was not an issue fully discussed at the last Inquiry, but we would like the idea to be considered in any re-assessment of the overall design that might be forthcoming.

### **3. Consistency with Development Plan policies**

Since the last Public Inquiry, a planning application was submitted in March 2018 for 11 Banstead Road, immediately adjoining the south site – application No. 18/01377/FUL. The proposal was to demolish the existing dwellings and the erection of four and five storey building comprising of 34 retirement living apartments including communal facilities, the formation of vehicular accesses and the provision of associated car parking.

The application was refused in September 2018 by Croydon Council and their decision upheld by the Planning Inspector on appeal in late September 2019.

In the Planning Inspectors' report he said in para 27;

We quote:

*"However, I conclude that my findings on these matters does not outweigh the significant collective harm that the proposed development would cause to the character and appearance of the area through its layout, scale and massing. For these reasons, the proposal would not accord with CLP policies SP1.2, SP4.1, SP4.2, DM10.1a) and c), London Plan Policies 7.4 and 7.6, Framework paragraphs 124 and 127, the SPG, and DLP Policy CG1, which carries limited weight. Jointly these policies and guidance, whilst recognising the need for growth, and the place specific scale set out in CLP Policy DM42.1, among other things, seek the creation of high quality buildings and places that function well and respect the scale and massing of the area's character, so that the development positively enhances and strengthens that character, and creates places with a high standard of amenity for future users."*

For information CLP - Policy SP1.2 - says and we quote:

*“Place making*

*SP1.2 - The Council will require all new development in the borough to contribute to enhancing a sense of place and improving the character of the area, whilst acknowledging the need for growth:*

*a. Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon;*  
*and b. Development proposals should be informed by the 16 Places of Croydon - The Places of Croydon, the Borough Character Appraisal and other place-based evidence.*

*SP4.1 The Council will require development of a high quality, which respects and enhances Croydon’s varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities. The Council will apply a presumption in favour of development provided it meets the requirements of Policy SP4 and other applicable policies of the development plan.*

*SP4.2 The Council will require development to*

*a. Be informed by the distinctive qualities, identity, topography and opportunities of the relevant Places of Croydon;*

*b. Protect Local Designated Views, Croydon Panoramas, the setting of Landmarks, other important vistas and skylines;*

*and c. Enhance social cohesion and well-being.*

*DM10.1 Proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:*

*a. The development pattern, layout and siting;*

*c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.*

*London Plan 7.4*

*Policy 7.4 Local character  
Policy and Strategic*

*A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with*

*natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.*

*Policy 7.6 Architecture  
Policy and Strategic*

*A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.*

*Planning decisions*

*B Buildings and structures should:*

- a) be of the highest architectural quality*
- b) be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm*
- c) comprise details and materials that complement, not necessarily replicate, the local architectural character*
- d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.*
- e) incorporate best practice in resource management and climate change mitigation and adaptation.*
- f) provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces.*
- g) be adaptable to different activities and land uses, particularly at ground level.*
- h) meet the principles of inclusive design.*
- i) optimise the potential of sites.”*

*End of quote.*

It is the view of the Rule 6 party that if Croydon Council refused this application and this Planning Inspector has upheld their decision, then we believe this particular application should also not be allowed for the reasons stated above.

#### **4. Impact on Heritage Assets, in Particular to the Brighton Road Frontage**

In relation to this tall building we are also concerned with the overshadowing effect on the Purley District Centre.

Whilst the proposal includes hourly approximate shadow plans relative to the surrounding buildings and streets, these understate the true impact of the lack of direct sunlight on the PDC.

The plans only show the hours between 8 am and 4 pm on 21 March, which is a week before British Summer Time starts. The biggest shadowing period in the summer months would occur from early afternoon on Russell Hill Road, mid-afternoon across the main Brighton Road shopping parades and late afternoon on Purley Road and the Jolly Farmers public house.

We believe the effect of the proposals, darkening the streets in the PDC could have an adverse subliminal effect on pedestrians acting as further deterrent to shopping in the centre.

The submitted daylighting drawings should have accurately shown the overshadowing effect in all four seasons. The submission is therefore inadequate and unreliable as a true picture of the daylighting impacts. It is impossible, as a result, for the Inspector or the public, or the Council, to fully understand the impact of the proposals. The RAs strongly believe the development will have a severe adverse impact on the daylighting of the town centre, and the ambience and attractiveness of central Purley for the next 80 to 100 years, which could quite easily be the real life of this tower.

The RAs do not agree that there will be no harm to the heritage assets of the PDC, or that the height and massing of the blocks are acceptable because of the tracery façade. The massing and the 17-storey height will make it difficult to appreciate the detailing at this height, particularly when in shadow, or **subject to the direction of the sun and time of day.**

The proposals will severely reduce direct sunlight and the overall ambient light levels, in the shopping areas of Brighton Road and the adjacent portion of Russell Hill Road, during all seasons, but particularly in winter.

This lack of sunlight could make the area near the tower unattractive to shoppers and visitors to cafes, restaurants, when the town centre is naturally

at its daytime busiest. The existing daylighting is enjoyed in winter as well as the other three seasons, which is a real benefit for the ambience of Purley as a town centre shopping environment in the bleaker months. This will make the street chilly and lose appeal. In our view, this is going to make Purley far less attractive to shoppers and people seeking refreshment.

## **5. Vehicular Access/Exit to and from Russell Hill Rd on the Island Site and On Street Parking**

There are no on street visitor vehicle bays for the island site, which will prohibit emergency parking for doctor, care workers and other medical staff to visit.

There is only one goods vehicle parking bay available on Banstead Road, nearest to the tower, which will probably be able to accommodate an ambulance, removal, or one delivery lorry. This means vehicles would need to take turns to deliver for the island site. In view of the increased trend for on-line deliveries and internet shopping, where are other vehicles going to park if the loading bays are occupied for deliveries to the residential residents?

To exit the car park for the island site for both the church and the 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 towards the M25; 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. We do not consider that this is safe and could increase the 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, wheelchair users and parents with buggies etc, walking on that side of the footway and trying to cross the access road to and from the Island site.

## **6. Air Quality – principally in relation to the previous point, associated air quality with traffic movements to and from the island site.**

### **PARTICLE POLLUTION PM2.5 - Particulate Matter**

The Mayor of London's Map of Air Quality and pollution showing PM2.5 map and exposure data for London published in 2014 updated in October 2017.

This report contains an introduction to PM2.5, and summarises current understanding of PM2.5 concentrations and exposure. It discusses the

findings of research undertaken by the GLA and TfL into the extent of PM2.5 pollution in London and assesses the potential for meeting World Health Organisation guidelines by 2030. Analysis found that at present all Londoners are exposed to concentrations higher than WHO air quality guidelines, but, if PM2.5 reduction measures within the Mayor's Transport Strategy and London Environment Strategy are accompanied by co-operation on a national and international level, the guideline limit is achievable by 2030.

The map shows the Purley area is 2 levels above at 15 – 16 PM2.5. Purley town centre and Purley Cross Gyratory is 3 levels above at 16 - 17 PM2.5 at a level more in line with inner London.

Placing the entry and exit to the Island site, with traffic joining existing stationary traffic with idling engines can only increase the levels of PM2.5. A number of studies by Local Authorities, including Lambeth and Dudley, have concluded that stationary cars idling engines produces more than twice as much pollution than they do when in motion. Exhaust emissions contain a range of air pollutants such as carbon monoxide, nitrogen dioxide, and particulate matter. These can affect the air quality of the surrounding environment and the air.

As traffic enters and exits the site, the vehicles will have to cross the footway on the southern side of Russell Hill Road and wait until there is a convenient gap in the traffic to merge into the A23 traffic flow. As Russell Hill Rd has a high pedestrian footfall due to the location of restaurants, retail and office units and a pub, this will inflict additional exhaust fumes affecting both users of the pavement but also nearby buildings.

Croydon Council's Air Quality Action Plan 2017 to 2022 published by them in the summer of 2018 identifies a 'focus area' of five places in Croydon which were failing to meet the EU's annual average limit for nitrogen dioxide – 40 micrograms per cubic metre. Purley Cross and Russell Hill are listed as one of those five places in the Borough of Croydon.

Indeed it was only reported last week (November 2019) that researchers led by a team at King's have analysed studies combining medical records and air pollution data across nine English cities including London. They found those living within 50 metres of busy roads in London had a 9.7 per cent higher risk of lung cancer than those on quieter streets, based on long-term average pollution levels. The pollution particles from exhaust fumes, among other sources, are easily inhaled – potentially damaging lung cells' DNA, which can lead to cancer. The study concludes the capital's major roads may contribute to 390 lung cancer cases.

## **7. Traffic congestion in PDC and Transport Links**

- **Traffic Congestion in PDC**

The RAs have major concerns about the effect that the development will have on the existing Purley Gyratory System during construction and after construction. The Purley Gyratory System is made up of two TfL trunk roads consisting of the A23 from Central London/Brighton and also the M23; and the A22 from Eastbourne including the M25 at Junction 6 for Godstone. In addition two Class A Roads, the A235 and the A2022 along with the unclassified Pampisford Road, which acts as an alternative route to central Croydon. This road is also used by two major bus routes.

The RAs believe that the approved Westfield scheme in Croydon town centre is likely to put even more pressure on the already congested road network in Purley, which this proposal is likely to exacerbate still further.

Such a large development on the island site could 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 the M23 and also the M25 at Junctions 6 and 7.

TfL in 2017 started a second consultation on the A23/A232 junction improvement at Fiveways, to the north of this proposal. Changes have since been made to the design and they hope to begin construction in late 2021, or early 2022.

TfL have also stated that Purley Cross will be under review at some time in the near future. Purley Cross is one of the most congested junctions on the A23 in the Croydon and TfL area. This was highlighted in 2009 in a report; by Peter Brett for Croydon Borough Transport Strategy.

Although traffic in Greater London fell from 2008 onwards, this changed in 2012, when traffic levels began to rise again. In TfL's Travel in London, Report 7 2014; Clauses 3.13 & 3.14, it is clear that traffic in outer London has increased in the last two years and is now back to 2008 levels. Indeed, TfL forecast that it may rise by 5% or more in outer London and according to TfL Travel in London 2017, this has continued to rise since 2014.

This was also confirmed by a subsequent study by the DfT; Road Traffic Estimates: Great Britain 2014 which showed traffic increased in London by 1.8% and SE England covering Surrey by 2.3%. In the latest update of Provisional Road Traffic estimates for Great Britain published in September 2017, the DfT provisional figures showed that 325.1 billion vehicle miles travelled on Great Britain's roads in the year ending June 2017. Traffic has now increased each quarter in succession for over four years.

Not only does the Gyratory at Purley Cross experience large volumes of traffic but it also suffers from a large number of accidents. This is partly due to the volume of traffic and also the layout of the gyratory with its many junctions where traffic has to cross to different lanes.

From information on the Crashmap website which records all injury accidents for accidents over the last 5 years up to 2018, at the Gyratory, there have been 25 accidents within the area covered by the Gyratory. Of these, fourteen occurred in Russell Hill Road on the approach to the traffic signals with Brighton Rd and three on the exit from Russell Hill Rd into Purley Road, where it is proposed all traffic to the island site, will enter and exit from. It is suggested by the RAs that if traffic from all approach roads has to cross a number of lanes to enter or exit the island site, it will greatly increase the risk of further accidents, whilst also hindering the flow of traffic on the A23 in Russell Hill Rd.

Russell Hill Rd, for many hours of the day and night has three lanes of traffic queuing at the traffic signals. The exit from the proposal will require drivers to try and nudge their vehicles out into the traffic flow, potentially across to the central or nearside lane. This changing of lanes is likely to be the main causes of low speed accidents. Not only this, it will also interrupt the flow of traffic in Russell Hill Road and reduce the volume of traffic that can cross the junction with the Brighton Road causing further tailbacks up the Purley Way - and also on Foxley Lane. In addition to this, Russell Hill Rd has a high pedestrian footfall due to the location of restaurants, retail and office units and a public house. The entry and exit placed here will also restrict pedestrian flow along this side of Russell Hill Rd.

Traffic is constantly stacking at all times for long periods in the day to the three lanes at the traffic signals in Russell Hill Rd to the Brighton Rd junction at and well past the proposed entry and exit location for the island site. It only reduces late evening until early morning.

The RAs do not understand why the vehicle entry and exit to the island site is not located in Banstead Road, which would allow an easier access to and from site. There is usually a pause in the traffic when the traffic signals are red at the junction of Brighton Road, near to the Library and also at the junction of Foxley Lane. Not only this, but as can be seen from Crashmap there have been no reportable accidents in Banstead Road in the last 5 years at the RAs suggested point of entry/exit to the island site. In addition, Russell Hill Rd has a much higher pedestrian footfall due to the location of restaurants, retail and office units and a pub compared to that in Banstead Road that has none of these facilities.

- **Transport Links**

Purley has good public transport links running north to south, although this is not the case in terms of west to east. For example to travel to Bromley which is 9 miles by road from Purley Cross, will take in excess of an hour off peak by public transport and will involve either two bus changes, or two train changes.

The likelihood of residents travelling to Croydon for their retail and leisure needs is likely to be further increased by the forthcoming Westfield development in Croydon town centre, meaning that this scheme will not improve the viability and vitality of PDC and is only likely to add to the decline of the centre in terms of falling retail sales, reduced footfall, increased business failures and rising vacancies.

That concludes the case for the Rule 6 Party.