**Please give details of why you consider this part of the revised Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate**

The proposed housing target for Purley is unrealistic at 5,735 new units. This is the third highest target across the Borough, after Croydon Town Centre (14,500) and the Purley Way (7,515). For context, the Council have approved 1,544 new housing units in Purley since 2018, and there are planning applications for a further 807 housing units yet to be determined (as at 1st February 2022). The vast majority of the approved housing units for Purley, and those that are proposed, are from so-called ‘windfall sites’. For the reasons expanded upon below (infrastructure provision, emergency service provision, public transport, car parking, provision of accessible leisure facilities) additional housing units in the Purley area at the level proposed would be unsustainable, irresponsible, and potentially dangerous. Furthermore the new housing units proposed for Croydon Town Centre, and especially for the Purley Way, must be considered speculative numbers, as the Council has little direct control over these areas, and no money for Compulsory Purchase Orders. Consequently it is likely that there will be additional pressure to at least deliver the ‘windfall sites’ target of 10,897 new housing units, if not exceed it, adding additional pressure for yet more of such developments in areas like Purley.

1,544 new housing units have already been approved for Purley, with planning applications for a further 807 yet to determined. Irrespective of any additional housing unit targets being applied to Purley, all those already approved, including very significant developments (100+ housing units) in the town centre, have been approved without the provision of any additional infrastructure, such as GP Surgeries, provision of police and emergency services, schools (note: the new school at Reedham has a Borough wide catchment), and also basic infrastructure such as drainage, water, gas electricity, and broadband. Further intensification of the Purley area without additional infrastructure is unsustainable, irresponsible, and potentially dangerous.

The Council make a number of statements about new developments needing to respect the local character and distinctiveness of Purley (paragraph 11.154, Policy SP5.4). Numerous, usually ‘windfall sites’, have been developed which patently do not respect local character, especially outside the Town Centre. In part this is due to the poor and weak wording of the Croydon Suburban Design Guide. Paragraph 11.154 refers to the Design Guide as a mechanism by which local character will be maintained, and if it is to achieve this it must be updated and strengthened, and Planning Officers must ensure this is understood by developers.

Realistic car parking numbers for new developments need to be adopted. The Council have allowed housing developments to proceed with less than 1 car per housing unit. This is justified by reference to proximity to public transport, availability of on-street car parking, and the need to ‘force’ people on to public transport to help the environment. The council acknowledge throughout the Purley section of the proposed Local Plan Update that Purley is both a hilly area (eg paragraphs 11.154A and 11.154b), and that public transport needs improvement (paragraphs 11.152 and 11.161). This makes car ownership more of a necessity in the area, added to which it appears that people are now more likely to ‘swap their petrol and diesel vehicles for electric ones to help the environment, rather than move 100% to public transport.

The Council acknowledge that public transport needs improvement in Purley for the town to grow (paragraphs 11.152 and 11.161). Vague statements are made about improvement are made (eg ‘To enable growth a transportation corridor will be promoted…’ (paragraph 11.152); ‘The council will work with TfL…/ The Council will work with Network Rail…’ (paragraph 11.161)). No definitive or tangible proposals are set out. Consequently, any growth in Purley should be linked to public tangible transport improvements.

The Council, together with local Purley organisations like Purley B.I.D., The Purley Panel, and the Purley & Woodcote Residents Association, spent considerable time and resource in reaching out and engaging with the Purley community to produce the Purley Strategic Framework. The Purley Strategic Framework sets out a vision for Purley Town Centre, supported by residents, covering the area that the Council wish to designate as an area for ‘Focused Intensification’. Much more prominence should be given to the Purley Strategic Framework and its’ objectives in the Local Plan. Developers seeking to (re)develop in Purley Town Centre / Focused Intensification area should be required to adhere to the Purley Strategic Framework, and the Council should look for, and actively encourage, such adherence, and proposals to assist delivery of the Purley Strategic Framework, in considering planning applications for this area. Paragraphs 11.154D and 11.67A should be amended to reflect this requirement.

Reference is made in paragraphs 11.151 and 11.153 to a new ‘Enterprise Centre’ for Purley (which might include a relocated Library). Paragraph 11.153 describes this as, ‘a multi-purpose space that facilitates commercial, community and cultural activities’, which will be, ‘located as part of a newly provided leisure centre’. Whilst the implication from these paragraphs is that the ‘Enterprise Centre’ should be centrally located in Purley Town Centre, Figure 11.10 shows it proposed further East on Brighton Road. It might be that two ‘Enterprise Centres’ are being proposed for Purley:

1. Purley Leisure Centre / Car Park / former Sainsbury’s Supermarket, located on Purley High Street (Site 30 in Table 11.10). Indeed for a faction of the price of building a new leisure centre, as this local plan update proposes, the Council could have refurbished this current facility, rather orchestrating its inappropriate closure.
2. Dairy Crest Dairy at 823-825 Brighton Road, described as having potential as, ‘a creative and cultural Industries Enterprise Centre’ (Site 495 in Table 11.10).

Clarity is required. The proposal for two ‘Enterprise Centres’, as described in Table 11.10, is a good one to be supported. It is also essential that Purley has accessible leisure facilities for both current and new residents.

Policy DM 42.1 refers to a 16 storey landmark development in Purley town centre. Construction of this (now being 17 storeys) is underway, and therefore this ‘proposal’ should be deleted.

**Please set out the modification(s) you consider necessary to make the revised Local Plan legally compliant and sound, in respect to the matters you have identified above.**

Housing targets – Review and reduce new housing unit targets to realistic levels, given the number of additional housing units already approved, or for which there are current planning applications, in Purley, and the lack of infrastructure and public transport to support additional growth. Additional housing unit numbers should be linked to infrastructure provision.

Purley Strategic Framework – Developers should be guided by the Framework in producing proposals for Purley Town Centre / Focused Intensification area, and the Council should look for, and actively encourage, such adherence, and proposals to assist delivery of the Purley Strategic Framework Paragraphs in considering Purley planning applications. 11.154D and 11.67A of the proposed Local Plan should be amended to reflect this requirement.

Enterprise Centre(s) – Clarify what is proposed, and where, under this heading: Purley Leisure Centre / Car Park / former Sainsbury’s Supermarket, located on Purley High Street or, Dairy Crest Dairy at 823-825 Brighton Road, or both.

Further intensification of the Purley area without additional infrastructure is irresponsible – Include realistic proposals for additional infrastructure, including accessible leisure facilities, and phasing for any housing targets to enable infrastructure provision to keep up.

Realistic car parking numbers for new developments need to be adopted, recognising the topography of the Purley area, and growing use of electric vehicles.

Delete reference to a 16 storey ‘landmark’ building in Purley Town Centre (as it is under construction).

The Council acknowledge that public transport needs improvement in Purley for the town to grow - Any growth in Purley should be linked to public transport improvements.

Protecting local character and distinctiveness – Update and strengthen the current Suburban Design Guide.