

Development, Enterprise and Environment

Sabah Hill
Merton Council
Merton Civic Centre
London Road
Morden
Surrey
SM4 5DX

Our ref: D&P/3130b/JF01
Your ref: 14/P4361
Date: 4 February 2015

Appendix 5 Wimbledon Stadium Committee Report

Dear Sabah,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 Wimbledon Stadium, Plough Lane, Tooting, SW17 0BL
Local authority planning application reference: 14/P4361**

I refer to the copy of the above planning application, which was received from you on 19 December 2015. On 4 February 2015, the Mayor considered a report on this proposal; reference D&P/3130b/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that while the principle of development is in general accordance with strategic and local planning policy, the application does not comply with the London Plan, for the reasons set out in paragraph 111 of this report; but that the possible remedies set out in that paragraph could help address these deficiencies. Notwithstanding this, the Mayor raised specific concerns with regards to the potential lack of animation along the proposed north-south pedestrian route as a result of the long, inactive frontage provided by the eastern stadium elevation and requested that the applicant should explore the opportunity of providing some active uses within it. Furthermore, the Mayor requested to see visitor attendance figures for the Greyhound Stadium over the last three years and these should therefore be provided.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose

and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Mark Day, e-mail: mark.day@tfl.gov.uk, telephone: 020 3054 7025.

Yours sincerely,



Colin Wilson

Senior Manager– Development & Projects

cc Richard Tracey, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Duncan Parr, Savills, 74 High Street, Sevenoaks, TN13 1JR

Wimbledon Greyhound Stadium, Plough Lane, Wimbledon

in the London Borough of Merton

planning application no. 14/P4361

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

The proposals comprise the demolition of the existing buildings and the erection of a 20,000 seat football stadium (initially 11,000 seat) with hospitality and coach parking, pedestrian streets, 1,273 sq.m. retail unit, 1,730 sq.m. squash and fitness club, 602 residential units with basement parking, refuse storage, 297 car parking spaces, cycle parking, and associated landscaping/open space and servicing.

The applicant

The applicant is **Galliard Homes** and the architect is **Sheppard Robson**.

Strategic issues

The proposed **sporting intensification** of the site, to provide a **professional sports venue** enabled by **mixed-use redevelopment** comprising **residential**, improved squash club and **fitness facilities** and **small scale retail** is supported in principle by strategic and local planning policy. However, this is subject to it being demonstrated that the proposals are acceptable from a **flood risk** perspective and the issues outlined above regarding **density, design** and **transport** being adequately addressed.

In addition to the above, there are a number of outstanding issues regarding affordable housing, children's play space, urban design and sustainable development that need to be addressed before being referred back to the Mayor.

Recommendation

That Merton Council be advised that while the principle of development is in general accordance with strategic and local planning policy, the application does not comply with the London Plan, for the reasons set out in paragraph 111 of this report; but that the possible remedies set out in that paragraph could help address these deficiencies.

Context

1 On 19 December 2014 the Mayor of London received documents from Merton Council notifying him of a planning application of potential strategic importance to develop the above

site for the above uses. The Mayor is required to provide the Council with a statutory report setting out whether he considers that applications comply with the London Plan. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B and 1C of the Schedule to the Order 2008:

- 1A 1. *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"; and*
- 1B(b). *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres"; and*
- 1C(c). *"Development which comprises or includes the erection of a building... more than 30 metres high and is outside the City of London".*

3 Once Merton Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The 5.1 hectare site is located in the north east corner of the London Borough of Merton and is bordered by the London Borough of Wandsworth on its northern and eastern boundaries. The site is bounded by Riverside Road to the north, Summerstown Road to the east, Plough Lane to the south and the National Grid Substation to the west. Beyond the site boundary; the River Wandle navigation is approximately 200 metres to the west of the site and Lambeth Cemetery is a short distance to the south. As a result of the close proximity to the River Wandle, the site and its surrounds are situated within its functional floodplain (Flood Zone 3b) and the majority of the site is within a critical drainage area for surface water flooding.

7 The nearest part of the Transport for London Road Network is the A24 Tooting High Street which is approximately 1.2 kilometres south-east of the site, although the A217 Garratt Lane, which forms part of the Strategic Road Network is less than 100 metres north-east of the site. A bus route runs along Plough Lane with a further four routes on Garratt Lane. A further route runs along Gap Road which is 500 metres to the west of the site. Haydon's Road rail station is located 800 metres south of the site. As such, the majority of the site records a public transport accessibility level (PTAL) of three, on a scale from one to six where six is excellent, representing average access to public transport. However, the northern most part of the site only records a PTAL of two.

8 The western portion of the site is currently occupied by the existing Wimbledon Greyhound Racing Stadium and Christopher's Squash and Fitness Club, and a small three storey building is situated to the south east of the site. The remaining area of the site is covered by hard standing

and car parking. The sites immediate context is comprised of light industry and warehouse uses, with residential beyond to the east and south west.

9 The site is allocated with the Council's recently adopted Sites and Policies Plan (July 2014) for redevelopment by the *"intensification of a sporting activity (D2 Use Class) with supporting enabling development"* and goes further to state that *"development that facilitates more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation."* The parcels of land surrounding the site on all sides are identified as Strategic Industrial Locations.

Details of the proposal

10 The proposal is for the demolition of the existing buildings on site and redevelopment to provide a 20,000 seat football stadium for AFC Wimbledon, which will initially be constructed to 11,000 seat capacity, including hospitality and coach parking, a 1,273 sq.m. retail unit, a 1,730 sq.m. squash and fitness club, 602 residential units with basement parking and refuse stores, associated car parking, servicing and landscaping.

11 It is proposed that the development will be delivered in phases, with an interim stadium of 11,000 seat capacity to be constructed initially with the ability to increase capacity to 20,000 seats within the physical envelope of the structure. It is understood that the stadium will be complete prior to the occupation of the residential units which are situated to the north, south and east of the proposed stadium. The stadium will be orientated on a north-south axis in order to provide an optimum orientation of the playing surface.

12 The proposals are submitted as a full planning application with all elements proposed in detail with the exception of the later phases of the stadium, which would be controlled by a phasing plan secured by planning condition.

AFC Wimbledon

13 Wimbledon Football Club historically played at a site on Plough Lane, to the south-west of the application boundary, at the corner of Plough Lane and Haydons Road (A218) for over eighty years. This ground is understood to have had a capacity of approximately 16,000 spectators. In August 2001, the club announced its intentions to relocate to Milton Keynes and Wimbledon FC entered administration in June 2003. The club played their first match in Milton Keynes in September that year and was brought out of administration at the end of the season; subsequently rebranded as Milton Keynes Dons. The fans in opposition to the club's relocation to Milton Keynes reacted by founding their own club named AFC Wimbledon in 2002.

14 The club plays in League Two of the Football League and currently play at the Kingsmeadow Stadium in the Royal Borough of Kingston Upon Thames which is shared with Kingstonian FC. The proposals are driven by the club's ambition to return to a stadium in its home borough.

Case history

15 The applicant engaged in pre-application discussions with GLA officers regarding the proposals for the application site in September 2014. The discussions concluded that the principle of the sports-led mixed-use redevelopment of the site that would provide a new professional sporting venue was in general accordance with local and strategic planning policy. However, as outlined in the report further information and clarification was sought regarding the proposed affordable housing offer, urban design, inclusive design, sustainable development and transport. A number of these issues remain and are reiterated within this report.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan; the Mayor's A Sporting Future for London*
- Flood risk *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG*
- Density *London Plan; Housing SPG*
- Urban design *London Plan;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy;*
- Parking *London Plan*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Merton Core Strategy, 2014 Sites and Policies Plan and Policies Map and the London Plan (with 2013 Alterations).

18 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The Draft Further Alterations to the London Plan, intend to publish version as submitted to the Secretary of State, December 2014.

Principle of development

Loss of greyhound stadium and retail impact

19 As set out above the Wimbledon Greyhound Stadium is an allocated site (Site 37) within the recently adopted Merton Sites and Policies Development Plan Document (2014), which supports the "*intensification of a Sporting Activity (D2 Use Class) with supporting enabling development*" at this location. The Mayor made formal representations to the Council throughout the consultation process for the DPD and while the document was considered to be in general conformity with the London Plan he raised specific concerns over the potential loss of a greyhound racing use at the site. However, after further discussions with the Council, the landowners and further information regarding the aspirations for the site, the Mayor was of the final view that while the retention of a greyhound stadium use at the site would be ideal, the intensification of a sporting use at the site in the form of other financially viable stadia uses, where feasible, would ultimately be acceptable in strategic planning terms, subject to the proposals satisfying London Plan policy on retail and town centre development (Policy 4.7) and supporting London's cultural, sport and entertainment provision (Policy 4.6).

20 London Plan Policy 4.6 seeks to support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural and economic benefits they offer to its residents, workers and visitors. In accordance with this policy, such developments should also have regard to London Plan Policy 4.7 regarding retail and town centre development and complete an impact assessment where necessary, be located on sites with good access by public transport, be accessible to all sections of the community and address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities. In addition to the above, London Plan Policy 3.3 which provides strategic support for the provision of housing within London and Policy 3.19 which supports the provision and enhancement of sports facilities are also relevant to the proposals.

21 The proposals will deliver a new 20,000 seat football stadium (initial capacity 11,000) for AFC Wimbledon on the existing greyhound racing stadium site, reprovide a new squash club and fitness centre, and provide 1,273 sq.m. of retail floorspace plus 602 residential units. Due to the out of centre location, in accordance with local planning policy which sets a floorspace threshold of 280 sq.m., the proposed element of retail to be provided as part of the sports-led mixed use redevelopment will be subject to a retail impact assessment.

22 The applicant has carried out such an assessment in support of the proposed retail unit which is intended to be used as a small format foodstore, although an operator has not yet been finalised. The assessment has been carried out in accordance with the guidance in the NPPF and Planning Policy Guidance and based on empirical data contained within the Merton Retail Study (2011) and Wandsworth Retail Study (2012). The sequential test demonstrates that there are no suitable alternative sites of an adequate size to accommodate the retail element and furthermore that it is not appropriate to disaggregate the retail element from the rest of proposals as this would not meet the needs of the proposed residential population. In accordance with guidance, the assessment has also analysed the potential impact of the retail floorspace on existing, committed and planned public and private investment on allocated sites within Wimbledon and Tooting Town Centres and any potential impact on the vitality and viability of these centres. The assessment concludes that due to the small scale and intended role of the retail floorspace, it will not have a significant adverse impact on the allocated sites and furthermore that it will not have a large enough retail draw as to have a significant adverse economic impact on the on any of the defined centres in the London Boroughs of Merton or Wandsworth. Officers are therefore content that the proposed amount of retail floorspace satisfies the requirements of London Plan Policy 4.7.

23 The proposals will provide sporting intensification of the site through the provision of a professional sporting venue and improved squash club and fitness centres facilities thus continuing a sports use at this location, which will be enabled by the provision of new homes and small scale retail development and is therefore supported in principle by strategic and local planning policy. However, given the site's location within the functional floodplain of the River Wandle and an area with high probability for flooding, the introduction of a significant amount of residential development does raise some concerns. Therefore, before the proposed development can be considered fully acceptable, it will be necessary for the applicant to demonstrate that the proposals are acceptable from a flood risk perspective and as set out below, further information and discussion is required before this can be appropriately assessed.

24 Also, as set out at the pre-application stage, any development of the high density proposed will need to be of the highest standards of design and provide high quality residential accommodation that is well designed, and delivers an appropriate mix of units, with sufficient play and amenity space, in order to be acceptable. The applicant is therefore strongly advised to address those issues regarding affordable housing, play space and design set out within the following paragraphs.

25 While it is noted that the applicant intends to complete the stadium prior to the occupation of the residential units, the Council should include a clause within the associated section 106 agreement or an appropriate planning condition that secures this and the GLA would welcome consultation on the final wording.

Flood risk

26 As set out above and within the site description set out in Council's site allocation for the Greyhound Stadium site, the site and its surrounds are within the functional floodplain of the River Wandle, which is identified as being within the highest flood risk category; Flood Zone 3b. The majority of the site is also in a critical drainage area for surface water flooding. Therefore, the proposals would significantly increase the number of people and properties exposed to potential fluvial and surface water flood risk which raises strategic concerns and this is reflected in national, strategic and local planning policy regarding flood risk assessment. As set out below, further information is required before the proposals can be appropriately assessed against London Plan Policy 5.12.

Flood risk assessment framework

27 On assessment of the London Borough of Merton Level 2 Strategic Floodrisk Assessment, July 2009 (SFRA) and the applicant's Flood Risk Assessment (FRA), it has become unclear to officers as to which flood zone category the application site actually falls within. Figure A1 of the SFRA suggests that the entire site is within Flood Zone 3b which is consistent with the description in the Council's recently adopted Site Allocations document. However, at the site-specific level, Table A.6 suggests that while the majority of the site is within Flood Zone 3b, the eastern part of the site is within 3a or 2, however, it is not clear from the map gradients and the associated key. The document goes further to state that residential development may be appropriate in Zone 3a, subject to passing the Exception Test required by National Planning Policy Guidance (NPPG) (see below), and that development in the functional floodplain should be restricted to water compatible uses only. Further clarification is therefore required on the extent to which Flood Zone 3b covers the site as the supporting FRA does not make this distinction either and how this classification corresponds spatially with the proposed landuses on site, as this has a significant bearing on the proposed approach to assessment set out within the National Planning Policy Framework (NPPF) & National Planning Policy Guidance (NPPG).

28 As set out in the supporting FRA, the NPPF follows a sequential risk-based approach to determining the suitability of land for development with the intention of steering all new development to the areas of lowest flood risk, by seeking to identify the most suitable sites for each use at the lowest risk of flooding. As part of this assessment, Table 2 of the NPPG for Flood Zone and Flood Risk classifies the relevant flood risk vulnerability of various development types, which are then applied to Table 3: Flood risk vulnerability and flood zone compatibility, to assess whether a proposed landuse is compatible with the flood zone which it is potentially located. It also identifies whether it is necessary to apply the Exception Test to certain land uses in each flood zone. In order for the Exception Test to be passed it must:

- a) be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- b) a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

29 The mixed-use proposals fall within two different categories; the stadium (non-residential institution) is defined as a 'less vulnerable' use and the residential element is defined as a 'more vulnerable' use. If one applies Table 3 strictly, then national policy states that neither a stadium use nor residential use should be permitted within Flood Zone 3b. With regards to Flood Zone 3a, the table does suggest that 'more vulnerable' uses may be acceptable subject to satisfying the Exception Test. This framework is also reflected Merton's local planning Policy DM F1: Support for flood risk management which requires that development in Flood Zones 1, 2, 3a and 3b meet similar criteria where relevant.

30 As set out above, the submitted FRA does not differentiate between categories 3a and 3b and on this basis the applicant has applied the Exception Test to the development. Furthermore, the applicant argues that there is a conflict between the compatibility test and the intentions of the sequential test which form part of the assessment tools set out in the NPPG, as the framework provided by Tables 2 and 3 takes a more absolutist approach that seeks to 'bar' certain types of developments from sites in certain flood zones regardless of whether they are the preferred sites as an outcome of the sequential test; albeit this only applies to the most vulnerable landuses in the highest flood risk zones. The applicant goes further to argue that while it is accepted that development in Flood Zone 3b is undesirable, if it presents the only opportunity for development, has wider benefits which outweigh the flood risk and those risks can be successfully managed, then there is no absolute reason that it should not be permitted.

31 Given the uncertainty over the extent to which Flood Zone 3b (or 3a) covers the site due to the disparities between the maps in the SFRA, the site description in the Site Allocations document and the lack of clarity within the FRA, further discussion is required with the applicant, the Council and the Environment Agency as to the actual flood zone allocation and whether the Exception Test is indeed applicable or appropriate in this case. While it is noted that the applicant has addressed the test in the FRA, it is not considered appropriate to assess the justifications provided until further clarification has been gained.

General comments on submitted FRA

32 Notwithstanding the above, it is noted that the FRA comments that no flooding has been recorded on site since 1968 and questions whether in fact the site really is within Flood Zone 3b. The fact that there has been no flooding for forty years does not of itself mean that the site is not within the one in twenty year Flood Zone 3b and this comment should be disregarded, unless revised modelling backs up the point. It could easily be the case that the site gets flooded several times in relatively quick succession and the assessment also notes that the site has frequently been affected by surface water flooding. The FRA states that the Environment Agency flood model for the River Wandle was due to be updated by the end of 2014, however, no further information has been provided to suggest that this modelling has been completed. If this model were to demonstrate that the extent of Flood Zone 3b is significantly less than the current extent, then this may help clarify the above issues and allay the current concerns.

33 It is understood from the assessment that the maximum duration of a flood is likely to be less than twelve hours but that during the peak flood depth (which may be up to ten hours) the site will be inaccessible for emergency services either by foot or by vehicle. This appears to be an unsatisfactory position for any new development. The basement parking, squash club and ancillary elements of the football stadium will be significantly below the all flood levels and would present particular hazards to anyone occupying these areas at times of flooding.

Flood mitigation and management

34 In response to the high flood risk of the site a number of mitigation measures for both the residential and stadium elements of the development.

35 The residential element of the site is to be constructed on a podium at least 0.6 metres above the predicted 1 in 100 year flood level and the football stadium concourses will be partly above the 1 in 100 flood level and partly 1.4 metres below that level, the retail unit will also be below the 1 in 100 level.

36 The FRA states that the residential blocks will have power and other services sited within non-floodable plant rooms, thereby enabling residents to remain safely within the building with full access to residential amenities. This aspect of flood risk management is welcomed and appears to be reasonably well thought through, although there are limited numbers of previous developments where such an approach has been implemented. It would also need to be clear to any occupants that the Flood Emergency Plan is to remain on site.

37 The principles of a Flood Warning and Evacuation Plan (FWEP) have been agreed with the Council's Emergency Planning Team. For a managed site such as the football stadium, which is used for a relatively small proportion of time and actively managed, the flood warning and emergency evacuation procedures are likely to be capable of being implemented. The FWEP is also proposed to provide a car park management plan. This would need to consider how such a space could be managed given that the car park is likely to be inundated to a significant depth and that vehicles are likely to be floating. In addition it will be a significant challenge to prevent people accessing such a dangerous area if they feel that they could "rescue" their vehicles and this should be considered within the plan.

Surface water run-off

38 It is proposed that the residential area will achieve a 65% reduction in surface water discharge by using cellular storage and a restricted flow discharge to the culverted watercourse/sewer that runs under the stadium element of the site. The stadium element of the site will achieve a greenfield run-off rate by utilising approximately 1,500 cubic metres of storage and a restricted discharge to the culverted watercourse/sewer running under the stadium.

39 The FRA references a possible rainwater harvesting system but makes no commitment. However, there are other sports stadia/training grounds which have implemented rainwater harvesting systems on the basis that these prove cost effective given the high irrigation requirements of a professional sports pitch and this should be pursued further.

40 Notwithstanding the above comments, the overall the proposed approach to surface water management could be considered acceptable in terms of London Plan Policy 5.13.

Housing

41 As set out above, the proposals would deliver 602 residential units via the mix illustrated in the table below.

Unit type	Total no. units	% units
Studio	13	2
One bed	212	35
Two bed	245	41
Three bed	127	21
Four bed	5	1
Total	602	100

Affordable housing

42 It is understood that the applicant intends to provide an element of affordable housing, but this is subject to scheme viability and ongoing discussions with the Council. As set out at the pre-application meeting, in accordance with London Plan Policy 3.12, officers expect that any proposed affordable housing contribution represents the maximum reasonable amount and is underpinned by a detailed and robust financial viability appraisal. The supporting viability report is expected to be independently assessed on behalf of the Council to verify whether the proposed affordable housing provision would be the maximum reasonable, with the results to be shared in full with GLA officers. The applicant has previously suggested that options for locating affordable housing within residential Block B to the north of the stadium were being explored; however, no information with regards to the quantum and tenure was presented due to the ongoing viability work.

43 The London Plan clearly establishes affordable rent within the definition of affordable housing set out in Policy 3.10, and makes clear that for the purposes of affordable housing targets, and specifically the 60:40 affordable housing split, affordable rent is categorised as helping to meet the 60% social housing component. Given that, as noted in the Mayor's Housing Supplementary Planning Guidance, Government anticipates that funding of social rent provision will only be supported in limited circumstances, in order to maximise overall affordable housing delivery in line with London Plan requirements, the proposal is expected to maximise the delivery of affordable rent units.

44 Further discussions with the Council and GLA officers regarding the provision of affordable housing are strongly encouraged as the scheme progresses. The applicant should also seek expressions of interest from Registered Providers regarding the delivery of the affordable housing units as soon as possible. At this stage it is not yet possible to determine whether this application accords with London Plan policy 3.12.

Housing choice

45 London Plan Policy 3.8, together with the Mayor's Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. Subject to the outcome of the ongoing affordable housing discussions, the applicant should take account the strategic priority afforded to affordable family accommodation.

Residential standards

46 As set out in the urban design section below, the indicative residential quality of the units appears to be high and further detailed comments are provided in the design section below. The design and access statement provides a range of average unit sizes for each type that demonstrates that all the units will comply with and exceed the minimum space standards set out in table 3.3 of the London Plan, which is welcomed. In addition to this, given the proposed high

density, the applicant should also provide an assessment of the units against the baseline and good practice standards set out within the Mayor's Housing SPG.

Children's play space

47 Using the methodology in Appendix Two of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), the applicant has calculated an expected child yield for the development of 69 children, which generates a play space requirement of 688 sq.m. Of the 68 children expected to live within the development, 39 of them are estimated to be aged under five years old and therefore at least 390 sq.m. of play space should be provided as door-stop play.

48 It is proposed that the development would provide 900 sq.m. of door-stop play within the individual residential courtyards of the development, that have been designed as multifunctional spaces. While the space provision for young children is considered generous and is welcomed, other than a sample of precedent images, limited information has been provided on the actual design of these courtyard spaces and how the proposed landscape features will provide genuinely stimulating and engaging play space and this should be provided to support the proposed vision. As encouraged at the pre-application stage, this information should also demonstrate how inclusive design principles have been integrated into the site wide play strategy.

49 In addition to the onsite provision, the applicant has identified existing local and neighbourhood play facilities within 400 and 800 metre radiuses that are equipped with play facilities and MUGA's, that could be suitable to meet the needs of older children that live within the development. There are also other open recreational spaces in the vicinity but these do not provide any specific recreational equipment. As requested at the pre-application stage, further information regarding the identified local and neighbourhood playable spaces, such as their size, condition and facilities should be provided in order for officers to assess their suitability as it is not clear from the material provided. Following an audit of the existing facilities, it may be necessary for the development to make a financial contribution towards improvements/upgrades.

50 While the approach set out within the design and access statement is considered generally positive, further detailed information regarding the detailed design of the proposed onsite play space features and the existing off site provision is required before this aspect of the scheme can be considered fully acceptable.

Residential density

51 Given the characteristics of the site, the public transport accessibility level (PTAL) of three, and its urban location, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density of between 200 to 450 habitable rooms per hectare (hr/ha) for this development. The applicant has provided a residential density figure of 590 hr/ha, excluding the stadium footprint. The applicant should clarify that the method used to calculate this figure has been based on net residential area, in accordance with guidance in London Plan paragraphs 3.30 and 3.31 in support of London Plan Policy 3.4, and paragraph 1.3.47 of the Mayor's Housing SPG (2012).

52 As acknowledged within the planning statement and set out at the pre-application stage, the density ranges recommended in Table 3.2 of the London Plan should not be applied mechanistically and that PTAL alone is not an appropriate measurement to inform residential density. However, in accordance with paragraph 1.3.41 of the Mayor's Housing SPG, in order to be acceptable, any development will need to be of the highest standards of design, and provide high quality residential accommodation that is well designed, and delivers an appropriate mix of units, with sufficient play and amenity space. Given the information submitted thus far, the indicative residential quality appears to be of a generally high standard. However, as per the comments below, further information is required regarding the outlook of those units facing onto the stadium wall, the site's integration into the wider area and those issues raised in the transport section need to be addressed. This is in addition to those points raised above regarding housing and play space. The applicant should therefore support the requested density calculation by a robust justification of the proposed residential density against the principles set out in London Plan Policy 3.4 and paragraph 1.3.41 of the Mayor's Housing SPG.

Social infrastructure

53 In accordance with London Plan Policy 3.16, given the potential increased demand on social infrastructure in the area as a result of the proposed new residential population, the applicant and the Council should ensure that the necessary measures or financial contributions are secured to mitigate any impact on local facilities, particular schools and healthcare facilities.

Urban design

54 The design of the proposed development has been discussed at pre-application stage where it was set out that in order for a scheme of this scale and density to be acceptable its design needed to be of an outstanding quality, and further work on this was required. While the applicant has sought to address some of these issues raised with the GLA pre-application advice, a number have not been adequately addressed and further work is still required. These are reiterated in the section below.

Wider context

55 Given the largely industrial context of the site, it is critical that the proposal is based on a comprehensive understanding of how the wider area is likely to change and how the proposed scheme does not compromise this. Without this wider understanding the scheme is at risk of becoming a segregated high density enclave surrounded by hostile and unfriendly industrial streets which is a significant concern. As requested at the pre-application stage, the applicant is required to provide an indicative masterplan for the wider area to illustrate how the development form will successfully integrate with the surrounding sites now and in the future and not become isolated. Sites such as those along Summerstown, south of Riverside Road and south of Copper Mill Lane are critical to how well the development will integrate to the wider area and indicative proposal for these sites should be illustrated.

Layout

56 The provision of a north south route through the site is welcomed, breaking down an otherwise large and impermeable block and making the area significantly more permeable. This route is flanked to the east by stepped entrances to maisonettes on the ground floor which will provide important levels of activity and animation critical to making this route feel safe and well used. However, the western edge of this route is flanked by the stadium wall, which provides little in terms of animation or outlook to help ensure the route feels active and inviting as well as creating a poor outlook for the residential units opposite. As requested at the pre-application

stage, the applicant has provided a number of precedent studies showing existing streets and developments in London with similar distances of separation (12-15 metres). While the studies are welcomed in demonstrating the proposed proportions and level of enclosure, the streets shown in the images are successful due to the presence of active uses on both sides, which is not the case for this proposal. The issues regarding the lack of animation and poor outlook provided by the stadium wall remain to be adequately addressed and the indicative views of this route provided in the supporting material are orientated away from the stadium elevation. The applicant should therefore provide indicative views along this route orientated towards the stadium wall and elevation studies in order to demonstrate how the stadium wall will be designed to respond to the adjacent residential use and provide visual interest to those using the route and the residential units that face directly on to it. This needs to be provided before the quality of this route can be appropriately assessed.

57 Whilst north-south permeability is improved by the proposed layout, the size of the stadium is such that it is not possible to get a continuous east-west route across the site. At the pre-application stage, officer's raised concerns that a potential street linking Somerstown to the new north-south route had not been explored, although this route is currently subject to the future redevelopment of a site which is not in the applicant's control (the Volante building). The applicant has suggested that the residential courtyards for Building A which back onto the existing building could be linked into the north-south route to provide a new link from Somerstown, should this site come forward for redevelopment. This consideration of future opportunities to further increase permeability and to knit the development into the wider urban context should be demonstrated as part of the indicative masterplan information requested above in paragraph 54.

Residential quality

58 Notwithstanding the issues of the proximity of units looking at the stadium wall, the residential quality appears to be high. The generous provision of vertical circulation cores allows for a high proportion of dual aspect units and limits the number of units sharing each landing which is strongly supported. The provision of through units avoids any north facing single aspect units, and the south facing single aspect units are all relatively shallow, mitigating the issues usually associated to them.

Appearance

59 The architectural appearance of the development is characterised by the simple gridded brick elevations of the residential element which is welcomed. The use of brick is supported as is the simple palette of materials and lack of superfluous articulation. However, critical to the elegance of the final building will be the quality of the construction details and officers strongly encourage the applicant to retain the same architect through to construction stage.

Height and scale

60 In summary, whilst a development of up to nine storeys in height on this site is significantly taller than the contextual height of the area, given the scale of the stadium, this does not present any strategic concern. Nonetheless for any development of this scale and prominence to be acceptable its design needs to be of an outstanding quality and as set out above and at pre-application stage, further work on this is required at this stage.

Inclusive design

61 The proposal is not currently considered to be compliant with London Plan Policy 7.2 Inclusive Environments. The scheme is considered to meet the minimum requirements of accessibility but does not meet the criteria of the policy. The design and access statement does not adequately demonstrate that inclusive design principles are embedded into every aspect of the design process and that best practice access standards are met.

Consultation and access consultant

62 The pre application report recommended that due to the complex nature of the site and the broad range of development proposed, the appointment of an access consultant and specific engagement with disabled people be carried out. The applicant identifies that they will consult with the disabled supporters for the stadium, but no commitment is made for the wider masterplan nor does it appear any consultation has been considered prior to the submission. Further commitment and information is therefore required regarding a thorough consultation strategy.

Public realm, landscaping and amenity space

63 The transport assessment identifies that a PERS audit is to be carried out, however, in addition to this it is recommended that an assessment be made of the accessibility of the surrounding public access routes in order to identify any possible improvements, for example the provision of dropped kerbs, tactile paving or accessible bus stops.

64 The pre application report noted that the switchback ramps provided to the residential courtyards meet minimum standards in regards to access, but are not considered an inclusive solution and further detail/justification was required. The design and access statement states that:

‘The internal courtyards of Building A are accessible for wheelchair users by ramps provided in the north-west (gradient of 1:15) and south-eastern corners of the site (gradient of 1:16), while the courtyard of Building B accommodates a ramp on the eastern side, towards the north south street (gradient 1:15). The gradient of these ramps vary from 1:15 to 1:16, complying with the Accessible London SPG requirements and Part M from Building Regulations.’

65 Approved Document to Part M Building regulations identifies that for level changes over two metres ramps are not appropriate for wheelchair users. Further the Accessible London SPG states that gradients should be minimised, and formal ramps (gradients between 1:20 and 1:12) in addition to steps should only be considered as a last resort. Therefore these ramps are not acceptable.

66 In addition to the above, the landscape strategy and precedent images suggest that no accessible seating would be provided and it is important that seating is accessible to disabled and older people. The applicant should refer to the Accessible London SPG for further information.

Residential units

67 It is proposed that the development would provide sixty wheelchair accessible or easily adaptable units which equates to 10% of the overall provision, which is welcomed. These should be provided across tenures, once the affordable housing provision has been finalised. However,

a further detailed assessment of the accessible units is required as not all of the example units provided are compliant with wheelchair housing design standards. For example the unit 'Building A: Typical 2 bed/3 person unit'; it is unclear whether the second bedroom meets the necessary requirements and for unit 'Building C: Typical 2 bed/3person'; if the charging point is utilised then the table would not be accessible and an unobstructed 300 mm to the leading edge of the door would not be achievable. In addition, the numbering of the diagrams intending demonstrating wheelchair adaptability does not necessarily relate to the requirements and appears confusing. This assessment should therefore be revised to address the above concerns and resubmitted for further assessment.

68 The pre-application report identified that the ground-level maisonettes are accessed via stairs, but also have secondary access from the residential courtyards (accessed via the lifts). The current proposals appear to suggest that the step-free access is not the main entrance and as set out at the pre-application stage it is important that the main entrance to the units is step-free to comply with inclusive design principles. The applicant has stated the maisonettes have been designed flexibly to allow either door to be the principal entrance. However, from assessment of the plans this is not considered to be the case. The design and access statement states wheelchair access is through the back garden, this is not the principal entrance. The maisonettes are therefore not considered to be compliant with Policy 3.8 and the typology is not supported in its current form from an inclusive design perspective.

Parking

69 Of the sixty wheelchair accessible units 22 will be provided with a car parking space. This is noted as being London Plan compliant in the transport assessment. However, Lifetime Homes standards require that one parking bay should be provided for every wheelchair accessible or easily adaptable home and therefore this provision does not comply with the standard. As such, in the pre-application report it was recommended that a parking management plan be provided to identify how the bays will be allocated to residents of the wheelchair accessible units and that it should include a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced. The design and access statement identifies that this will be provided with the application, but the transport assessment states it is yet to be developed. Therefore, this should be secured by planning condition.

Sport

70 The squash club plans do not provide any accessible facilities and the design and access statement only identifies there is space for accessible shower facilities. This is not considered to be sufficient evidence that policy will be met. The design and access statement should clearly identify how the design of the facilities will meet Sport England's guidance on Accessible Sports Facilities.

New stadium

71 The design and access statement commits to Accessible Stadia and the UEFA and CAFE Good Practice Access for All in response to the GLA pre-application comments. However, the section on the Stadium within the design and access statement does not refer to meeting these standards. Furthermore, the development proposes the use of platform lifts for spectators. These are not considered a suitable solution for any modern stadia and as such the applicant should reconsider the approach to an inclusive solution. There are no elevated viewing areas proposed for disabled away fans and all accessible viewing areas are at pitch level. The UEFA

and CAFE Good Practice Guide 'Creating an Accessible Stadium and Matchday Experience' clearly discourages the provision of pitch level viewing areas and notes that some elevated positions should be provided. Therefore, further information and justification is required to demonstrate why the good practice standards committed to by the applicant cannot be met in the proposed design.

72 The applicant should also consider further good practice points, such as changing places facilities, which are recommended to be provided in Stadia by BS8300 and the Accessible London SPG. The design and access statement should also demonstrate that the back of house and players facilities will be accessible as only front of house areas are discussed.

73 As set out above, further information and revisions are required before the both the stadium and residential development can be considered acceptable in inclusive design terms.

Sustainable development

Climate change mitigation

74 The applicant has applied the energy saving hierarchy detailing savings from energy efficiency measures of 3% and savings of 20% through the provision of Combined Heat and Power (CHP) and 19% through the use of renewable technologies which results in a total carbon reduction of 38% compared to a 2013 Building Regulations compliant development. However, there are inconsistencies in the reporting of carbon emission tables, including slightly different figures and also labels including both Part L 2010 and Part L 2013. The applicant should confirm the version of Part L that was used in the assessment and provide the final carbon emission figures for each step of the energy hierarchy in line with GLA Guidance on preparing energy assessments. The carbon emissions should be assessed against a Part L 2013 baseline and sample DER and TER sheets and BRUKL worksheets including efficiency measures alone should be provided to support the savings claimed.

75 Notwithstanding the above, as a result of the high number of dual aspect units, the demand for cooling will be minimised through the incorporation of cross ventilation in 90% of dwellings. Where it is not appropriate to rely on opening windows to reduce hot air due to noise or security concerns it is proposed that Mechanical Ventilation Heat Recovery with boost facilities to provided sufficient ventilation. The applicant should provide the specification of the solar control glazing used in the assessment. The applicant has stated that initial analysis using SBEM software has been undertaken and shows that the solar gain limits in summer have not been exceeded for the commercial spaces. In addition the applicant also states that for the residential spaces the SAP Appendix P (Assessment of Internal Temperature in Summer) shows that the threshold of internal mean temperatures has not been exceeded on the hottest summer days. Part L compliance data sheets of the sample dwellings should be provided to demonstrate that there is only a slight risk of high summer temperatures. If the modelling outputs show a medium risk, further passive measures in line with Policy 5.9 should be integrated to reduce the risk of overheating.

76 The spreadsheets results provided in the appendix detailing the carbon performance of the sample model refer to older modelling versions associated with the previous revision of Part L (2010). The applicant should confirm that SAP and SBEM modelling was carried out following Part L 2013 methodology.

District heating and site heat network

77 The applicant has carried out an investigation and has identified that there are no existing or planned district heating networks within the vicinity of the proposed development. St Georges Hospital has been identified as the closest CHP system but connection is not considered feasible due to the distance from the site.

78 The London Heat Map shows that there is a decentralised energy opportunity area at Plough Lane adjacent to the site. The applicant should provide evidence that this opportunity has been investigated and evidence of correspondence with the Borough energy officer should be provided to confirm whether any progress has been made on this opportunity area and whether there is an opportunity to connect. However, the applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available which is welcomed.

79 The applicant is proposing to install a site wide network although it is proposed that only the residential units and the squash & fitness leisure area will be connected to the network. The retail units and stadium are not currently included in the heat network as the applicant claims that connection for these buildings is not appropriate due to their intermittent usage pattern, however, no evidence has been provided to support this statement. This approach is not policy compliant, the applicant should commit to connecting all domestic and non-domestic building uses with a heat demand to the site heat network.

80 The site heat network will be supplied from a single energy centre. This will be in the basement of Building A. The applicant should provide the indicative floor area of the energy centre and a layout of the heat network connecting all the buildings on site.

Combined heat and power

81 The applicant is proposing to install a 135 kW_e gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating for the residential units and the squash & leisure centre (65% of the total). The applicant is requested to provide further information on the sizing of the CHP as a 135 kW_e engine appears small relative to the carbon savings claimed and the demands to be met. The applicant should provide a monthly load profiles (in kWh/month) for the site showing the proportion of load to be met by the CHP and proposed running hours. Enough information should be provided to support the carbon savings claimed.

Renewable technologies

82 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels across the development and Air Source Heat Pumps (ASHPs) to provide heating and cooling to the retail units and stadium. The applicant is proposing to install 124.2 kWp on the roofs of the residential blocks and 450 sq.m. of higher efficiency PV panels (125kWp) on the roof of the stadium. The installation will be split in two phases with half the panels to be installed during phase one and the other half during phase two. The installed capacity of the PV should be secured by planning condition to ensure the proposed carbon saving are delivered.

83 The applicant is proposing ASHP with a Seasonal Co-efficient of Performance (SCoP) of 4.5 to meet 75% of heat demand for the retail and stadium with the remaining 25% to be provided by high efficiency gas boiler. The ASHP will also provide cooling to the stadium, retail and leisure centre at Seasonal Energy Efficiency Rating (SEER) of 6.5. The use of ASHPs for

heating does not follow the energy hierarchy and should be reviewed to address the comments set out above on connection to the district heating network.

84 The carbon dioxide saving proposed meet the target set within London Plan Policy 5.2, however it is unclear whether this has been calculated against Part L 2010 or against Part L 2013. Therefore, this should be clarified and the comments set out above addressed before compliance with London Plan energy policy can be verified.

Climate change adaptation

85 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. The residential element will be designed to meet Code for Sustainable Homes Level Four and the non-residential element is on target to achieve BREEAM 'Very Good' rating. Other measures proposed than those set out above, include the provision of green/brown roofs, water efficient fixtures and fittings, recycling facilities, the provision of a and the promotion of sustainable urban drainage techniques. The proposed measures set out within the sustainability statement should be secured by the Council through condition.

Transport

Football stadium

86 A total of 73 car parking spaces are proposed of which four will be for blue badge users. It is acknowledged that this level of provision is relatively low but some further information on the anticipated use of these spaces would be welcomed. Electric vehicle charging points should also be provided for 10% of these spaces. It is also welcomed that the transport assessment identifies potential locations for off-street car parking that may be available to spectators. It will be necessary for the club to work with any landowners that express an interest in opening their sites for matchday parking so that car parks can be allocated to spectators to minimise journey lengths and that agreements can be put in place to ensure impacts are minimised. Other football clubs have also introduced charging regimes to encourage car sharing, with higher tariffs imposed on cars with a single occupant and the use of this kind of incentive would also be supported here. All such measures will need to be secured in the section 106 agreement.

87 It appears that no stadium cycle parking is proposed. This is not acceptable, and as per Transport for London's pre-application advice, cycle parking should be secured for an absolute minimum of 2% of spectators. However, given that 2.8% of current supporters have expressed a preference for cycling, a higher level of provision is strongly encouraged and this should be secured through planning condition.

88 It is intended that coaches will drop off away spectators on Riverside Road before parking on an industrial estate in the vicinity of the site. This approach is used by other stadia in London, and is therefore acceptable in principle. However, as a site for parking has not been specifically identified, a coach management plan should be secured by section 106 agreement. More detail on the required contents of this plan has been provided in TfL's response individual to the Council.

89 Use of taxis or private hire vehicles on match or other event days has not been considered. Demand for taxis on these occasions could be significant and consideration should therefore be given to provision of a temporary taxi rank and a pick up and drop off area for private hire vehicles at these times.

90 Although some minor details require clarification, the approach to stadium trip generation is generally robust. This does however assume that the stadium is not used for concerts or other sporting events, although the hospitality facilities would be opened up for conferencing use outside of match days. This should be confirmed and secured with appropriate planning conditions.

91 The applicant accepts that the availability of on and other off street car parking will have a significant impact on how spectators choose to travel to the stadium and has assessed different mode choice scenarios dependent on whether existing parking restrictions are retained, or whether both Merton and Wandsworth councils choose to change the hours of local Controlled Parking Zones (CPZs) and single yellow line restrictions to discourage parking on matchdays. Given that this will have a significant impact on mode share and therefore the transport impact of the stadium, dialogue between the applicant, TfL and Merton and Wandsworth councils to test the robustness and deliverability of this approach is encouraged. TfL would welcome any measures introduced to encourage non-car modes but there would have to be a commitment to undertake a wider CPZ review and consultation. This would also require a commitment by the developer to fund this process and the implementation of CPZ and other parking measures. Work has also been carried out to identify possible locations for privately owned off street car parking and TfL would encourage the applicant to work with landowners that express an interest in this to ensure that any such parking can be appropriately managed. However, it should be noted that the public transport impact assessment has been carried out based on the high car / low public transport scenario with existing parking restrictions retained, and comments below on transport impacts are caveated on that basis.

92 Analysis of matchday impacts on the surrounding pedestrian network has been undertaken. At football matches, a certain amount of crowding is to be expected, particularly at the end of matches. However, even with the lower 11,000 capacity stadium, a number of footways around the stadium would be unacceptably crowded. This analysis suggests that temporary road closures are very likely to be required on match days for safety. Further pedestrian analysis is needed to enable TfL and the relevant councils to understand the extent and length of any road closures that may be required, their subsequent impact on the highway and bus operations and any mitigation that may be necessary. To minimise impacts it would be sensible to develop a spectator retention strategy in order to try and spread the departure of spectators over a period of time at the end of matches and this and any other measures deemed to be necessary would subsequently need to be formalised through a Local Area Management Plan (LAMP), which will need to be secured by condition. It is requested that TfL is consulted on the detail of the LAMP prior to its approval.

93 The number of bus trips anticipated on a matchday in the 20,000 capacity scenario is unlikely to be accommodated on the local bus network. Given that home matches will be infrequent, TfL does not provide additional scheduled bus services for events at sports stadia. This does however mean that some trips currently taken by bus are likely to instead use trains or cycle, increasing these numbers respectively.

94 The greatest matchday station impact is predicted to be at Haydons Road and Earlsfield stations. However, TfL does consider that more spectators are likely to use Earlsfield station than predicted given the greater frequency of services in comparison to Haydons Road. Even with the spectator numbers outlined in the transport assessment, the applicant accepts that station management measures will be necessary on matchdays at Haydons Road, Earlsfield and Wimbledon stations. Measures have been outlined in the LAMP, and these broadly seem sensible. However, it does not appear that the respective station operators have been consulted on these measures, or whether there is sufficient capacity within the stations at gatelines, stairs

and platforms to accommodate the anticipated demand. As such, consultation with the station operators must take place before a decision is made on the application.

95 Equally, no assessment has been carried out on the background demand on rail or underground services and whether there is sufficient capacity to accommodate the additional matchday demand. Should this capacity not be available, queues at stations would last for longer than the hour at Haydons Road suggested within the transport assessment. An analysis of this background demand on rail is considered necessary, although underground services are likely to be able to accommodate the anticipated demand based on the data provided.

96 A stadium management plan, covering both the LAMP and a Stadium Travel Plan, has been provided. However, although it is accepted that the stadium travel plan will need to be developed in further detail once the constraints around the site are better known, it would be useful to understand the sorts of soft measures that the club is willing to commit to in order to promote sustainable transport. Mode share targets should be set out along with contingency plans should these fail to be reached. These may take the form of further financial contributions to address issues that may be identified around the site. The stadium management plan will need to be secured and monitored through the section 106 agreement.

Non-stadium uses

97 For the residential units, 222 car parking spaces are proposed at a ratio of 0.37 spaces per unit. It is proposed that residents will be exempt from applying for parking permits in surrounding CPZ via the section 106 agreement. This relatively low level of car parking is supported by TfL, as is the proposal that commercial parking will be for blue badge use only. However, the number of blue badge spaces for the proposed retail store should be confirmed. Within the parking provision, 20% of spaces will be provided with an electric vehicle charging point with passive provision for a further 20% of the spaces. This meets with London Plan policy and is supported.

98 A minimum of one publically accessible car club space is to be provided and TfL understands that the Council will seek three years membership of the car club for new residents as part of the commitments made through the travel plan. This is supported by TfL and should be secured through the section 106 agreement. A residential car park management plan should also be secured by condition.

99 A total of 685 cycle parking spaces are proposed across the three proposed residential buildings. This should be increased to a minimum of 992 spaces in line with the FALP standards, which are due to be adopted shortly.

100 Some further work on residential trip generation is required. On the basis of the figures presented in the transport assessment, the development will generate a number of trips on bus routes operating along Garratt Lane which are already at capacity and because of the nature of those routes, such a frequency increase would result in a requirement for an additional five buses to operate. The cost of these additional buses is £1.25m per year, and given the anticipated construction programme, TfL seeks £3.75m for a three year period. However, non-matchday impacts on rail and underground services are not considered to be significant.

101 The highway impact of the residential development is primarily an issue for the two local councils to comment on as the impact on the Transport for London Road Network has been considered acceptable, although TfL will be keen to ensure that the proposals do not have an adverse impact on bus operations. It is understood that Merton council may ask the applicant for further information to be provided in relation to highway impact, although it is accepted by all

parties that the local highway network, and particularly the junction of Plough Lane with Durnsford Road, is congested. Suggested mitigation has been put forward by the applicant at this junction, and TfL is happy to work with Merton Council to ensure that this will mitigate the impact of the scheme and provides adequate pedestrian and cycle facilities.

102 A pedestrian audit has been carried out on the main routes surrounding the site and whilst a number of them have scored well, the area immediately around the stadium has scored relatively poorly. Given this, the proposed alterations to Plough Lane and Riverside Road are welcomed. However a more comprehensive approach to pedestrian improvements is recommended to address concerns raised through the audit, in particular improvements to bus stops, the rationalisation of street clutter, provision of tactile information and enhancements to lighting and CCTV coverage. These improvements should also extend to Summerstown given proximity to the site. A signalised pedestrian crossing is also proposed on Plough Lane, allowing access to the proposed north-south spine road adjacent to the stadium. Whilst this seems reasonable, the applicant should analyse the proposed crossing against TfL criteria for new crossings.

103 A two metre cycle lane is also proposed adjacent to the northern footway of Plough Lane, linking the site to the Wandle Trail and National Cycle Route 20. This part of the Wandle Trail is part of the emerging proposals for a network of Quietways, and therefore measures to improve connections to it are welcomed. Nevertheless, the applicant and Merton Council may wish to assess the design in light of the emerging Quietways designs which look to introduce shared space on the footways rather than a dedicated cycle lane, which given the constraints in this area is likely to be difficult to implement with an adequate width for two-way cycling.

104 Travel Plans for the residential and retail uses have been submitted, and are generally of a good quality. These should be secured through the section 106 agreement for the site.

Construction and servicing

105 The transport assessment includes an outline construction logistics plan (CLP), which contains a number of welcome measures designed to reduce the number of vehicle movements associated with construction and to ensure the safety of local road users. These include commitments to encourage non-car travel by construction workers, to ensure that all bulk transit traffic is made away from highway peak hours, promotion of more efficient vehicles and promotion of FORS. The applicant should consider a further commitment to TfL's Standard for Construction Logistics, developed in partnership with the construction industry to reduce risks to vulnerable road users of construction vehicles. A condition securing a detailed CLP, including these measures, should be secured on any consent in addition to a delivery and servicing plan.

Community Infrastructure Levy

106 The London Borough of Merton adopted its CIL on the 1 April 2014. Residential development is charged at £220 per square metre and superstores at £100 per square metre. The associated Regulation 123 list identified improvements to Wimbledon station as one of the transport priorities for the CIL charge.

107 The Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL. The proposed development is in the London Borough of Merton, where the charging rate is £35 per square metre of chargeable floorspace.

Local planning authority's position

108 The local planning authority's position is not known at the time of writing this report.

Legal considerations

109 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

110 There are no financial considerations at this stage.

Conclusion

111 London Plan policies on culture, sport and entertainment provision, retail and town centre development, flood risk, housing, affordable housing, play space, urban design, inclusive design, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others and on balance does not comply with the London Plan. However, the possible remedies set out in this report could address these deficiencies.

- **Principle of development:** The principle of the sports-led mixed use redevelopment of the site that will be enabled by the provision of new homes and small scale retail development is generally supported in accordance with strategic and local planning policy. However, this is subject to it being demonstrated that the proposals are acceptable from a flood risk perspective and the issues outlined above regarding density, design and transport being adequately addressed.
- **Flood risk:** It is not clear as to the extent to which Flood Zone 3b (or 3a) covers the site due to the disparities between the supporting material and local policy documents and therefore further discussion is required with the applicant, the Council and the Environment Agency before the proposals can be appropriately assessed with regards to flood risk. The applicant should also address those comments regarding the proposed flood mitigation and management measures.
- **Affordable housing:** It is understood that the applicant intends to provide an element of affordable housing, but this is subject to scheme viability and ongoing discussions with the Council. In accordance with London Plan Policy 3.12, the supporting financial viability appraisal report is expected to be independently assessed on behalf of the Council to verify whether the proposed affordable housing provision would be the maximum reasonable, with the results to be shared in full with GLA officers. At this stage it is not yet possible to determine whether this application accords with London Plan policy 3.12.

- **Housing:** The indicative residential quality appears to be high and it has been demonstrated that all of the proposed units will meet or exceed the Mayor's minimum space standards, which is welcomed. Given the proposed high density, the applicant should also provide an assessment of the units against the baseline and good practice standards set out within the Mayor's Housing SPG.
- **Children's play space:** The development will meet the space provision for the onsite play requirements. However, while the approach set out within the design and access statement is considered generally positive, further detailed information regarding the proposed design of the onsite play space and existing off site provision is required before this aspect of the scheme can be considered fully acceptable.
- **Residential density:** The proposed density will exceed the guidance set out with the London Plan for a site of this character in this location. The applicant should confirm that the density figures are based on net residential area, in accordance with guidance in London Plan paragraphs 3.30 and 3.31 in support of London Plan Policy 3.4, and paragraph 1.3.47 of the Mayor's Housing SPG (2012). In order to be acceptable, any development of the proposed high density will need to be of the highest standards of design, provide high quality residential accommodation that is well designed, is accessible and delivers an appropriate mix of units, with sufficient play and amenity space. However, as set out within this report, further work is required with regards to these points and therefore further discussions are required before this can be appropriately assessed.
- **Urban design:** The provision of a new north-south route through the site is welcomed, as is the general architectural appearance of the residential element of the development. However, while the applicant has sought to address some of those issues raised at the pre-application stage, further work is still required in some areas. The applicant should provide an indicative masterplan for the wider area to illustrate how the development form will successfully integrate with the surrounding sites now and in the future and not become isolated. Furthermore, in order to address the concerns previously raised, the applicant should provide further information to demonstrate how the stadium wall will be designed to respond to the adjacent residential use and provide visual interest to those using the route and the residential units that face directly on to it. Notwithstanding the above,
- **Inclusive design:** The proposal is not currently considered to be compliant with London Plan Policy 7.2. The scheme is considered to meet the minimum requirements of accessibility but does not meet the criteria of the policy. The design and access statement does not adequately demonstrate that inclusive design principles are embedded into every aspect of the design process and that best practice access standards are met and therefore the applicant is required to address the comments set out above.
- **Climate change mitigation:** The carbon dioxide saving proposed meet the target set within London Plan Policy 5.2, however it is unclear whether this has been calculated against Part L 2010 or against Part L 2013. Therefore, this should be clarified and the comments set out above addressed before compliance with London Plan energy policy can be verified.

- **Transport:** As set out above, further work is needed across some key areas before the application is referred back to the Mayor at for his final decision. These include cycle parking, match day rail and pedestrian impacts and the impact of any subsequent temporary road closures, match day taxi and private hire facilities and development of soft measures to encourage sustainable travel by spectators. Discussions will also need to be had with Merton and Wandsworth councils on matchday parking controls, local highway impacts and mitigation for pedestrians and cyclists. TfL are happy to provide support on these matters where necessary. Bus capacity mitigation will also need to be secured.

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