

PLANNING APPLICATIONS COMMITTEE

23rd May 2016

UPRN	APPLICATION NO. 15/P3197	DATE VALID 14.08.2015
Address/Site	68-70 Meopham Road, Mitcham, CR4 1BJ	
(Ward)	Longthornton	
Proposal:	Demolition of existing buildings and redevelopment of the site to provide 14 x town houses.	
Drawing No's	Site location plan and drawings; 1669 6. 1E, 1669 9 1D, 1669 9 2D, 1669 9 3D, 1669 6 2E, 1669 6 7F, 1669 6 8D, 1669 6 0F & 1669 17, Ecological Report dated Jan 13 th 2016, Arboricultural Impact Assessment & Method Statement dated 15 th October 2015	
Contact Officer:	Leigh Harrington (020 8545 3836)	

RECOMMENDATION:

GRANT PLANNING PERMISSION SUBJECT TO A SECTION 106 AGREEMENT AND CONDITIONS.

CHECKLIST INFORMATION.

- S106 Heads of agreement: Yes
 - Is a screening opinion required: No
 - Is an Environmental Statement required: No
 - Has an Environmental Impact Assessment been submitted – No
 - Design Review Panel consulted – No
 - Number of neighbours consulted – 113
 - Press notice – Yes (Major)
 - Site notice – Yes
 - External consultations: Two
 - Number of jobs created – n/a
 - Density 66 units per ha
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1. Introduction.

1.1 The matter is brought before Members to seek approval to enter a s106 agreement for an off-site contribution towards affordable housing.

2. SITE DESCRIPTION.

- 2.1 The rectangular shaped proposal site covering 0.21 hectares is located on the south west side of Meopham Road close to the junction of Woodstock Way. Streatham Park Cemetery is located to the side and rear of the site.
- 2.2 There are two detached properties at the front of the site separated by a 7 metre wide shared private drive providing vehicle access from Meopham Road to the rear of the site. The property at 70 Meopham Road provides two floors of accommodation with a pitched roof. The second property at 68 Meopham Road provides accommodation at ground floor level and within the building roof space. The large area of land to the rear of the two buildings provides garden space and includes a number of ancillary residential outbuildings.
- 2.3 The local area includes a mixture of different building designs. These buildings include the adjacent three storey detached building at 72-88 Meopham Road which is of a contemporary design and provides sheltered residential accommodation in the form of 8 flats. To the north west of the site are the rear gardens of residential properties in Woodstock Way, these buildings in Woodstock Way and the property at 58-60 Meopham Road are of a simple design and each provide two maisonettes. On the opposite side of Meopham Road are two storey terraced houses mainly consisting of a first floor bay window and a pitched roof over a ground floor front addition.
- 2.4 The area is not at risk from flooding, an Archaeological Priority Area or a Conservation Area: and it has Public Transport Accessibility level of 2 which is low.
- 2.5 The site is relatively open as the established buildings are to the front of the site and benefits from a number of trees on the site which have been surveyed and categorised as part of the Arboricultural assessment of the application.

3. PROPOSAL

- 3.1 The application was originally submitted for the demolition of the existing buildings and the redevelopment of the site to provide 12 x town houses and 3 x flats. Following protracted discussion with officers and in response to neighbour concerns the proposals have been revised to provide 14 x townhouses and no flats and the layout of the road has been reversed. These amendments have also been the subject of a further re-consultation exercise.
- 3.2 Access to the site will now be to the south with an access roadway and footpath separating a terrace of five houses facing Meopham Road from the flats on the southern boundary. The northernmost of these houses adjacent to 58-60 Meopham Road will now be a two storey house, the others being three storeys.

3.3 The access road would then serve another terrace of five three storey townhouses which face the access road and now have back gardens abutting the rear gardens of the houses in Woodstock Way.

3.4 The access road and parking bays will separate this terrace from the terrace of four town houses located by the back boundary of the site with their rear gardens facing the cemetery.

3.5 Accommodation schedule (NB There is no Unit 6)

Unit	GIA	LP Standard	Garden Area Minimum size	Garden standard
1 3B 4P (2F)	84sqm	84	45	50
2-5 2B 3P (3F)	83sqm	83	42	50
7-9 2B 4P (3F)	102	92	50	50
10-11 2B 4P (3F) + Bay	102	92	47.5	50
12-15 3B 5P (3F)	102	99	50	50

4. **CONSULTATION**

4.1 A site notice was posted and letters sent to 113 neighbouring residents. 5 objections were received raising concerns relating to;

- Pressure on parking
- Subsidence
- Loss of privacy
- Noise and disturbance
- Increased anti-social behaviour
- Pressure on local services from increased numbers of residents
- Loss of biodiversity
- Loss of historically interesting buildings
- Scale, bulk and massing inappropriate
- Loss of light and visual intrusion
- Smells from the bin store
- Not correct mix of properties
- Impact on vehicle crossing
- Needs a construction management plan
- There are covenants on developing the land
- No mention of the wells on site
- Issues of not having a designated footpath
- Cemetery should not be considered public open land
- Will impact on privacy of people visiting the cemetery

- 4.2 The revised scheme was re-consulted upon to which the only response was a set of comments stating that the revisions were an improvement but there were still issues relating to;
- Loss of light compared to the existing situation as rear of the house by 60 Meopham protrudes beyond the rear elevation.
 - Impact of excavations on neighbouring houses
 - Flat roof adjacent to 60 could be an amenity space and needs a condition to prevent it.
 - The French doors could cause more overlooking
 - Needs a construction management plan
 - Details of materials and fenestration to be approved
 - Tree protection schemes are needed
 - PD rights should be removed given proximity to neighbours
- 4.3 The Longthornton Redevelopment Working Party responded to this consultation raising concerns relating to;
- Density is such that neighbours would be close to the development
 - Can drains and sewers cope
 - Restricted access to the site for emergency vehicles
 - Virtual footpath may be dangerous
 - Overlooking the cemetery has impact on privacy of mourners
- 4.4 Transport Planning. The proposals have undertaken a number of revision to address points of concern such that no objections are now raised to the proposals subject to the imposition of suitable conditions.
- 4.5 Trees Officer. No objections subject to conditions being imposed in relation to tree protection and site supervision including a 'no-dig' construction method for the root protection areas.
- 4.6 Future Merton - Open Space policy officer. Initial concerns relating to some inadequacies in the bio diversity mitigation measures. As a result further details were submitted in January and found to be acceptable.
- 4.7 Environmental Health. No objection to the proposals but requested a condition be imposed relating to external lighting and an informative in the event unexpected contamination was found on site.
- 4.8 Flood Risk engineer. No objection to the scheme. A Sustainable Urban Drainage Scheme should be provided for the site to be secured by means of a condition.
- 4.9 Structural engineer. (consulted in light of comments from neighbours regarding subsistence and soil slip). A full borehole investigation report with recommendations for the allowable bearing capacity to be used in the design of foundations from a chartered geotechnical engineer would be required for compliance with Building Regulations whilst a

condition dealing with demolition and construction method statements is recommended.

4.10 The Metropolitan Police Safer by Design officer.

There should be sufficient space for both pedestrian and vehicular access

- Efforts should be made to protect the flank walls against graffiti and vandalism
- The cycling parking and storage should incorporate ground anchors or stands secured into concrete foundations
- Shrubs and trees should be of a height not to interfere with natural surveillance
- Alleys leading to the rear of properties should be gated for security.

4.11 The Environment Agency. No objections

5. PLANNING HISTORY.

5.1 Proposal site

15/P1177 Application for the demolition of the existing 2 two bedroom detached houses at 68 and 70 Meopham Road and the construction of three residential terraces providing a total of 20 residential units (19 two bedroom houses and 1 one bedroom flat) with a part two, part three storey terrace fronting Meopham Road with under croft vehicle access to the rear of the site, a four storey terrace including a semi basement running parallel with Woodstock Way, a four storey terrace including a semi basement at the rear of the site and provision of 31 off street car parking spaces and parking for 20 cycles. Withdrawn by applicant.

5.2 Site at 72-88 Meopham Road

Planning permission was approved in March 2009 [LBM reference 08/P2830] for the demolition of the existing building and erection of a part 2 / part 3 storey building to provide 8 one bedroom self-contained flats for persons with learning disabilities with ancillary accommodation together with associated car and cycle parking and landscaping.

6. RELEVANT POLICIES

6.1 London Plan (2015)

Relevant policies include:

- 3.3 Increasing housing supply
- 3.5 Quality and design of housing developments
- 3.11 Affordable housing targets.
- 3.16 Protection of social infrastructure.
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction

- 5.7 Renewable energy
 - 5.10 Urban greening
 - 5.11 Green roofs and development site environs.
 - 5.13 Sustainable drainage
 - 6.3 Assessing effects of development on transport capacity
 - 6.9 Cycling
 - 6.10 Walking
 - 6.11 Smoothing traffic flow and tackling congestion
 - 6.12 Road network capacity
 - 6.13 Parking
 - 7.2 An inclusive environment
 - 7.3 Designing out crime
 - 7.4 Local character
 - 7.5 Public realm
 - 7.6 Architecture
 - 7.14 Improving air quality
 - 7.15 Reducing noise and enhancing soundscapes
 - 8.2 Planning obligations
- 6.2 London Housing Supplementary Planning Guidance 2012.
- 6.3 Merton Local Development Framework Core Strategy (2011)
 Relevant policies include:
 CS 2 Mitcham Sub-Area
 CS 8 Housing choice.
 CS 13 Open space and leisure
 CS 14 Design
 CS 15 Climate Change
 CS 18 Transport
 CS 19 Public transport
 CS 20 Parking servicing and delivery
- 6.4 Merton Sites and Policies Plan (2014)
 Relevant policies include:
 DM D1 Urban Design and the public realm
 DM D2 Design considerations
 DM EP4 Pollutants
 DM O1 Open space
 DM O2 Trees, hedges and landscape features
 DM T1 Support for sustainable travel and active travel
 DM T2 Transport impacts from development
 DM T3 Car parking and servicing standards
 DM T5 Access to the road network.
- 6.5 Merton SPDs
 Planning Obligations (2006),
 Design (2004).

7. PLANNING CONSIDERATIONS.

- 7.1 The key issues for consideration include establishing the principle of this development that will involve the loss of the two existing family houses; the design and appearance of the proposed buildings, the potential impact on the adjacent open space, the standard of the residential accommodation, the potential impact on residential amenity and on car parking and traffic generation.

Provision of housing.

- 7.2 Policy 3.3 of the London Plan 2015 states that development plan policies should seek to identify new sources of land for residential development including intensification of housing provision through development at higher densities and that the Council will work with housing providers to provide a minimum of 4,107 additional homes [411 new dwellings annually] between 2015 and 2025. Merton LDF Core Strategy policies CS8 & CS9 also seek to encourage proposals for well-designed and located new housing that will create socially mixed and sustainable neighbourhoods through physical regeneration and effective use of space. This proposal will provide 14 new units of family accommodation and is therefore considered to accord with these policies. Consequently the use of the site for residential purposes is supported.

Affordable housing

- 7.3 LDF Core Planning Strategy policy CS.8 seeks the provision of a mix of housing types including affordable housing. The Council seeks on site provision of affordable housing for schemes with 10 or units and London Plan policy 3.12 accords with that but does state that there is the possibility to provide an off-site contribution in exceptional circumstances where it can be demonstrated robustly that this is not appropriate. The applicant originally submitted a viability report that stated the proposal could not sustain an affordable housing contribution. This was independently assessed by a third party assessor who stated that the development could be viable and following further discussions with the assessor and the Council's Housing Needs manager it was considered that the applicant's proposal to allocate three of the three bedroom units on site for affordable housing was reasonable. However to date it has not proved attractive to find a Registered Provider willing to take on just three houses on this site. Consequently it was determined that a contribution of £261,500 towards the provision of off-site housing may be a satisfactory alternative that still met the overall goal of providing additional affordable housing within the borough.

Housing mix

- 7.4 Policy CS. 8 within the Council's Adopted Core Strategy [July 2011] states that the Council will seek the provision of a mix of housing types sizes and tenures at a local level to meet the needs of all sectors of the

community. This includes the provision of family sized and smaller housing units.

7.5 The application site is located in an area which provides a mixture of housing with maisonettes provided in Woodstock Way, flats at 72-88 Meopham Road and 123-128 Meopham Road and family housing on the opposite side of Meopham Road. The current revised proposal no longer includes the flats and now provides 14 houses; 4 three bedroom houses and 10 two bedroom houses.

7.6 It is considered that the proposed accommodation will increase the variety of residential accommodation available locally. It is considered that the current proposal will contribute towards the creation of a socially mixed and sustainable neighbourhood in accordance with Core Strategy policy CS8.

Layout, scale and design

7.7 Policy 7.4 of the London Plan requires buildings, streets and open spaces to provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in terms of orientation, scale, proportion and mass. Policy 7.6 sets out a number of key objectives for the design of new buildings including that they should be of the highest architectural quality, they should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm, and buildings should have details that complement, but not necessarily replicate the local architectural character. Policy CS14 of the adopted Core Strategy states that all development needs to be designed to respect, reinforce and enhance local character and contribute to Merton's sense of place and identity. This will be achieved in various ways including by promoting high quality design and providing functional spaces and buildings.

7.9 The articulation of the buildings fronting Meopham Road shown on the revised plans is welcomed, with the height, which has been reduced from the four storeys originally submitted at pre application stage, reflecting the adjacent maisonettes to the north and the flats to the south and the width of the houses is also comparable to the plot widths of nearby buildings in a similar way to the design of the adjacent building at 72 - 88 Meopham Road.

7.10 The layout of the site originally proposed meant that an access road would lead along the back gardens of the houses in Woodstock Way. This was considered inappropriate and to cause unnecessary noise and disturbance from traffic and so the road layout was flipped around to impact the fewest number of local residents. The layout has been further amended and improved through removing flats from the scheme thereby reducing the proximity of a third storey of development on the northern boundary and replacing them with a smaller two storey house and it also allowed for the removal of a poorly sited communal refuse

store, elements that all initially resulted in objections but have now been addressed.

- 7.11 Although each of the three terraces are different in terms of layout and internal configuration the design overall retains a similarity of design and material choices to create a sense of coherence for the development.
- 7.12 Following comments from the Police Safer by Design Officer it is recommended that various Safer by Design Principles be incorporated into the proposals particularly in respect of the exposed gable ends of the buildings and the alleyway to the rear of the houses facing Meopham Road. Consequently a condition that addresses issues of graffiti and crime prevention effect is recommended to ensure as far as possible that the development is safe, secure and attractive place to live.

Neighbour Amenity.

- 7.13 The application has been assessed against adopted planning policies in particular London Plan policy 7.6 and SPP policy DM D2 in terms of possible impacts such as loss of light, privacy and visual intrusion on neighbour amenity.
- 7.14 The site layout has been amended to reflect neighbour and officer concerns at the potential impact on neighbour amenity. In terms of visual intrusion and loss of light the block of flats that would have been close to the occupiers of 58-60 Meopham Road has been replaced with a two storey house which has the upper level virtually in line with that neighbour and a larger floor area at ground level. The other two terraces are largely separated from the boundaries of the site by either gardens or the access road. In order to ensure good levels of privacy the relevant windows are either in excess of the Council's standards for separation distances or have had the windows angled so that they look further away than they would otherwise.
- 7.15 Concerns raised as a result of consultation regarding the impact of building on this site due to the nature of the land with its wells and other features are matters that would be dealt with under the applicant's submission under the Building Regulations.

Standard of accommodation.

- 7.16 Sites and Policies Plan policy DM D2 seeks to ensure good quality residential accommodation with adequate levels of privacy, daylight and sunlight for existing and future residents, the provision of adequate amenity space and the avoidance of noise, vibration or other forms of pollution.
- 7.17 The same policy also sets a requirement for 50 sqm of private amenity space per house in a single usable plot and the application demonstrates that each house would provide at least this amount of

space. However as the development does not greatly exceed the minimum standard for external amenity space a condition removing permitted development rights for extensions is also recommended. This will ensure adequate garden space is not only provided but retained.

- 7.18 The Gross Internal Areas of the houses are required to comply with the minimum standards required by policy 3.5 of the 2015 London Plan. The London Housing Supplementary Planning Guidance 2012 establishes minimum room size standards and the minimum Gross Internal Area that a new property should achieve in order to provide a satisfactory standard of occupier amenity. Annex 4 of the London Housing Supplementary Planning Guidance 2012 sets out the minimum requires GIA which all the units exceed. Modest shortfalls below the Council's adopted standards for gardens are not considered to be a basis to withhold permission.

Parking, servicing and deliveries.

- 7.19 Core Strategy Policy CS 20 considers matters of pedestrian movement, safety, servicing and loading facilities for local businesses and manoeuvring for emergency vehicles as well as refuse storage and collection. The revised layout will provide a dedicated parking space for each house as well as 5 visitor spaces. The Council's Transport planning officer has no objection to the scheme subject to conditions relating to EV charging, and road surfacing treatment to ensure pedestrian safety.

Refuse and recycling

- 7.20 The refuse and recycling facilities will take the form of bin stores located alongside the access road. As no specific details have been provided it is recommended that a condition be attached requiring details to be approved.

Trees and Biodiversity

- 7.21 Core strategy policy CS 13 expects development proposals to incorporate and maintain appropriate elements of open space and landscape features such as trees which make a positive contribution to the wider network of open spaces whilst SPP policy DM 02 seeks to protect trees that have a significant amenity value as perceived from the public realm. The desire to retain as many high quality trees has been an important factor in the design of the proposals. The proposals involve the retention of all Category A and B trees, which are of the highest standard of tree. The proposal will involve the removal of 9 lower standard category C trees, the majority of which are situated at the rear of the site along with two category U trees which are deemed to be in very poor condition. To mitigate the loss two heavy standard replacement trees, a Blue Atlas Cedar and a Purple Beech are proposed. The revised proposal has placed the roadway closer to the existing trees on the southern side of the site which require protection during and after the construction process. The Council's Arboricultural officer was satisfied with the proposed tree works and tree protection

schemes as shown in the Arboricultural Impact Assessment and conditions to that effect are recommended.

- 7.22 Given the open nature of the site and its proximity to the open spaces of the adjacent cemetery the Council's open spaces policy officer was involved in discussions with the applicant's agents to ensure that the biodiversity of the site was not harmed by the development. Following the submission of further information from the applicant's ecological advisor, (Ecologic January 13th 2016) the officer is satisfied that these matters (hedge planting, wildlife friendly fencing and bird and bat roosting boxes) will be adequately addressed subject to a condition requiring those elements be implemented.

Sustainable design and construction.

- 7.23 New buildings must comply with the Mayor's and Merton's objectives on carbon emissions, renewable energy, sustainable design and construction, green roofs, flood risk management and sustainable drainage. To that end Officers would seek confirmation that the development would achieve not less than the CO2 reductions (ENE1) and internal water usage (WAT1) standards equivalent to Code for Sustainable Homes level 4. Evidence requirements are detailed in the schedule of evidence required for the post construction stage from Ene1 & Wat1 of the Code for Sustainable Homes Technical Guide. Evidence to demonstrate a 25% reduction compared to 2010 part L regulations and internal water usage rates of 105 litres/person/day would also need to be demonstrated. Conditions to this effect are recommended.

8. SUSTAINABILITY AND ENVIRONMENTAL IMPACT ASSESSMENT REQUIREMENTS

- 8.1 The proposal does not constitute Schedule 1 or Schedule 2 development. Accordingly, there are no requirements in terms of an Environmental Impact Assessment (EIA).

9. CONCLUSION

- 9.1 The proposed development will provide fourteen new family houses on a large site currently only occupied by two houses. The scheme has been designed to exceed the minimum standards in terms of internal and external space as well as parking provision. The design and materials are modern but the area has an eclectic range of styles of housing whilst the scale, bulk and massing are considered appropriate and in keeping with the local area and not to present harm to the amenity of neighbouring residents. Subject to the imposition of suitable conditions the proposals are recommended for approval.

RECOMMENDATION

Grant planning permission subject to planning conditions and the completion of a S106 agreement covering the following heads of terms:

- 1) Affordable housing contribution of £261,500;
- 2) The applicant agreeing to meet the Council's costs of preparing drafting and monitoring the section 106 obligations.

Conditions

1. A1 commencement of works
2. A7 Build to plans; Site location plan and drawings; 1669 6. 1E, 1669 9 1D, 1669 9 2D, 1669 9 3D, 1669 6 2E, 1669 6 7F, 1669 6 8D, 1669 6 0F & 1669 17, Ecological Report dated Jan 13th 2016, Arboricultural Impact Assessment & Method Statement dated 15th October 2015
3. B1 The materials to be approved.
4. B.4 Site and surface treatment.
5. B5 Details of boundary walls and fences.
6. C1 No permitted development for extensions
7. C8 No use of flat roofs
8. D10 Amended Any external lighting shall be positioned and angled to prevent any light spillage or glare beyond the site boundary and shall comply with BS 5489:2013
8. D11 Construction times.
9. F1 Landscaping details.
10. F2 Landscape implementation
11. The details and measures for the protection of the existing retained trees, including the no-dig method of construction within the root protection area of the retained trees as contained in the approved document 'Arboricultural Impact Assessment & Method Statement' dated 15th October 2015 shall be fully complied with. The approved methods for the protection of trees shall follow the sequence of events as detailed in the document and as shown on the Tree Protection Plan numbered 'P2428.2.002' including the provision of a protective wooden box around the street tree marked T2 and shall be retained and maintained until the completion of all site operations. Reason to protect and safeguard the existing retained trees in accordance with the following Development plan policies for Merton; policy 7.21 of the London plan 2015, policy CS 13 of Merton's Core Planning Strategy 2011 and policies DM D2 and DM O2 of Merton's Sites and Policies Plan 2014.
12. F9 Hardstandings

13. H1 Details of new vehicle access
14. H2 Vehicle access provision
15. H4 Provision of parking spaces.
16. H5 Visibility splays Prior to the occupation of the development 2metre x 2 metre pedestrian visibility splays shall be provided either side of the vehicular access to the site. Any objects within the visibility splays shall not exceed a height of 0.6 metres.
17. H10 Construction Vehicles, Washdown Facilities, etc (major sites)
18. H13 Construction logistics plan
19. Non Standard Condition (Sustainability) No part of the development hereby approved shall be occupied until evidence has been submitted to the Local Planning Authority demonstrating that the development has achieved not less than the CO2 reductions (ENE1) (a 25% reduction compared to 2010 part L regulations), and internal water usage (WAT1) (105 litres/p/day) standards equivalent to Code for Sustainable Homes level 4. Reason for condition: To ensure the development achieves a high standard of sustainability and makes efficient use of resources and to comply with policies 5.2 of the Adopted London Plan 2015 and CS 15 of the Merton Core Planning Strategy 2011.
20. Prior to first occupation of the development hereby approved the applicant shall have entered into and completed an agreement under s278 of the Highways Act with the Highways Authority to secure the installation of the new vehicle crossover at the location shown on the site plan 16696.0F and those works shall have been completed. Reason. To ensure the safe and efficient operation of the public highway in accordance with policies CS 20 of the Core Strategy 2011 and DM T2 of the Adopted Merton Sites and Policies Plan 2014.
21. H3 Redundant crossovers.
22. Prior to the occupation of the development hereby approved details of methods for protecting the gable end walls from graffiti and vandalism and methods for gating the access to the rear of gardens on the Meopham Road elevation in accordance with Safer by Design Principles shall be submitted and approved in writing by the Local Planning Authority. Reason to ensure a safe and secure layout for the development that takes account of crime prevention and to comply with policy DM D2 of the Adopted Merton Sites and Policies Plan 2014

23. Sustainable Urban Drainage H.18.
24. Prior to the occupation of the development hereby approved the ecological recommendations relating to the new hedgerow, wildlife fencing and roosting boxes detailed in the Ecological Mitigation & Enhancement Plan compiled by Ecologic Consultant Ecologists LLP dated 13th January 2016 shall be implemented in accordance with that report and maintained thereafter. Reason. To protect the ecology of the open space in accordance with policy CS 13 of the Merton Core Strategy 2011 and policy DM O2 of the adopted Sites and Policies Plan 2014
25. Demolition method statement. Reason; To ensure that neighbourhood amenity and safety is not harmed at any stage by the development proposal in accordance with policies DM D2 and DM EP 4 of the adopted Merton Sites and Policies Plan 2014.
26. Prior to the commencement of above ground construction works, details of proposed on-site electric charging points shall be submitted to and approved in writing by the Local Planning Authority. Reason; to ensure the adequate provision of electric charging points and to provide a safe on-site road layout in accordance with policies 6.13 of the London Plan 2015 and CS 20 of the Merton Core Strategy 2011.