

GREATER **LONDON** AUTHORITY  
Development, Enterprise and Environment

**David Gardener**  
Merton Council  
Merton Civic Centre  
London Road  
Morden, Surrey  
LONDON SM4 5DX

**Our ref:** D&P/3668/TT01  
**Your ref:** 15/P1798  
**Date:** 3 July 2015



Dear Mr Gardener,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**  
**Pinnacle House, 17 Hartfield Road, Wimbledon, SW19 3SE**  
**Local planning authority reference: 15/P1798**

I refer to the copy of the above planning application, which was received from you on 26 May 2015. On 3 July 2015, the Mayor considered a report on this proposal; reference D&P/3668/01. 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.

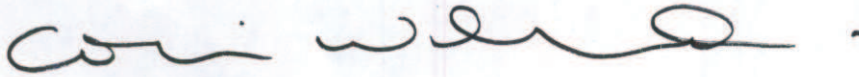
The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 49 of the above-mentioned report; but that the possible remedies set out in that paragraph could address these deficiencies.

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 Beth Havelock (email: BethHavelock@tfl.gov.uk), telephone: 020 3054 7026.



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  
Ms Jennifer Liu, CBRE Ltd, Henrietta Place, London W1G 0NB



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# Pinnacle House, Wimbledon

in the London Borough of Merton

planning application no.15/P1798

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**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**

Redevelopment of an existing office building for continued B1 office use. The proposal includes recladding, enhancement of elevations and erection of additional storeys including green roof and green terraces with reconfiguration of basement level to provide plant and cycle parking.

**The applicant**

The applicant is **Aviva Investors Pensions Ltd**, the agent is **CBRE Ltd** and the architect is **MATT Architecture**.

**Strategic issues**

**Principle of land use, extension of office spaces, urban design, access, sustainable development, and transport** are the key strategic issues relevant to this application.

**Recommendation**

That Merton Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 49 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies.

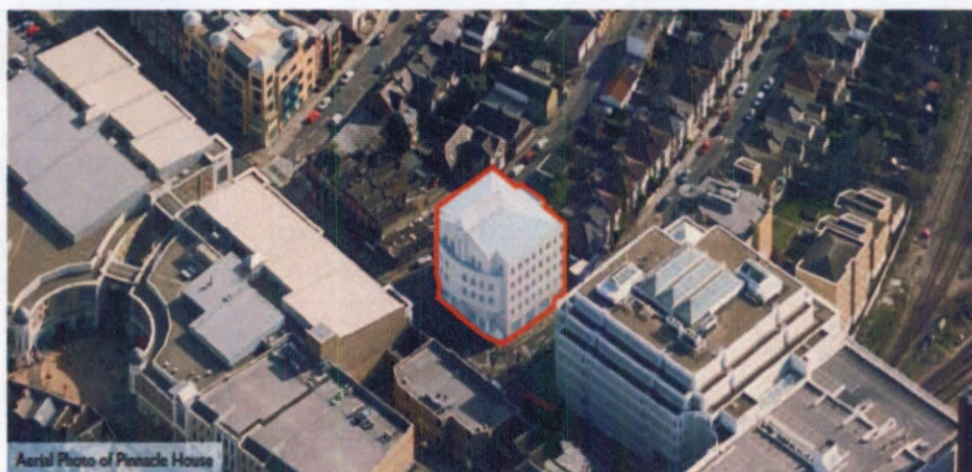
**Context**

1 On 26 May 2015 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. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 6 July 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. 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 Category 1C of the Schedule to the Order 2008: "Development which comprises or includes the erection of a building of one or more of the following descriptions – (c) the building is 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 Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).



*Uses plan diagram and aerial photo of the application site in a wider context: Source – applicant's design and access statement.*

### Site description

5 Pinnacle House which has an existing lawful use (Use Class B1), is located within Wimbledon town centre. The building is approximately 170m from Wimbledon Station. The site is situated on the south side of Hartfield Road (A219). It is bounded by Hartfield Crescent to the north west, the A219 Hartfield Road to the north east, Beulah Road to the south east and a timber yard to the southwest. The nearest conservation area is Wimbledon Broadway Conservation Area which is approximately 50m to the north of Pinnacle House. The site is accessed via Hartfield Road. The building occupies a square shaped plot of land that measures c. 0.07 hectares. The building itself has an existing gross external floor area of 3,878 sq.m.

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6 Pinnacle House is a late 1980s purpose built office building which is 5 storeys with a 2 storey pitched plant roof profile with an additional basement level providing 21 car parking spaces. The House is located in a mixed use area, comprising offices to the west, two storey Georgian-style terraced housing to the south and two to three storey retail units to the north and east. The buildings along Hartfield Road comprise an eclectic mix of styles and of varying height. The taller buildings are located closest to the town centre. The tallest building in the vicinity is Wimbledon Bridge House, a seven storey office building, which lies immediately to the west of Pinnacle House. Further tall buildings are situated to the east of the site along the southern side of Hartfield Road such as 41 Hartfield Road and Regency Court which are both 5 storeys.

7 In terms of the wider context, Victorian shop buildings can be found along The Broadway. These units are typically three storeys high, with a pitched roof concealed behind a parapet. Industrial units line the eastern side of Beulah Road.

8 The A283, Kingston Road, approximately 630m to the south of the site forms part of the Strategic Road Network, (SRN). The nearest section of Transport for London Road Network (TLRN) is located 1km to the south, A24 Morden Road and Morden High Street 1km to the east forms the start of Cycle Superhighway 7 (Merton to the city). The site is served by a total of nine bus routes, with the closest stops located on Hartfield Road 50m to the northwest. Wimbledon Station is approximately 200m to the north of site and provides access to London Underground (District & Circle lines), National Rail services and the Tramlink network (Dundonald Road stop). As such, the site has been estimated to have an excellent public transport accessibility level (PTAL) of 6a, on a scale of 1a – 6b where 6b is most accessible.

### Details of the proposal

9 The application seeks full planning permission for the refurbishment and extension of an existing building for continued office use. The full description of the development is:

- Refurbishment of the existing B1 Office building comprising the reconfiguration of internal spaces,
- recladding of the front elevation to Hartfield Road, enhancements to the other elevations,
- removal of existing roof and replacement with additional floors and a roof level plant room (reaching a total building height of 32.2m (with average storey height of 3.8m) and creating 5,635sqm of office floor space GEA, an increase of 1,756sqm GEA), and
- introduction of a green roof and green terraces, together with a reconfiguration of the basement to accommodate plant and cycle parking together with improvements to the public realm.

### Case history

10 There is no case history relevant to the current planning application.

### Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Offices *London Plan;*
- Employment *London Plan;*
- Town centre uses *London Plan; Town Centres SPG;*
- Urban design *London Plan;*
- Access *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;*



12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the 2011 Merton Core Strategy Development Plan Document and the 2014 Sites and Policies Plan, and the London Plan (Consolidated with Alterations since 2011).

13 The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance are also relevant material considerations.

**Principle of development: redevelopment of office use in a town centre**

14 London Plan Policy 4.2 supports the redevelopment of office provision to improve London's competitiveness and to address the objectives of the London Plan as whole. This policy also encourages the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility as well as seeking increases in the current stock where there is evidence of sustained demand.

15 The supporting text of the above policy indicates that the most viable location for the renewal and modernisation of office stock in outer London include locally oriented, town centre based office provision. As Wimbledon is designated as a major town centre in Merton, there is policy support for the creation of new office space at the application site.

16 The proposed redevelopment will result in an uplift in quantitative terms of 1,756sqm of commercial floorspace compared to the existing buildings. The development will significantly rejuvenate the site and office accommodation that no longer meet modern demands with inefficient layouts. The proposals will deliver high quality, well-designed flexible workspace that will support London's function as one of the world's most attractive and competitive business locations. The uplift in commercial floorspace is therefore strongly supported from a strategic planning perspective.

**Urban design**

17 The proposal involves the extension and refurbishment of the existing Pinnacle House and has been subject to Council pre-application and DRP discussion. The ground floor layout is broadly supported and the applicant has worked to simplify the existing plan, relocating the core to form flexible commercial floorplates and an improved and clearly defined, raised entrance area onto Hartfield Road.



*Existing and proposed development: Source- applicant's design and access statement.*

18 The introduction of a basement level is welcomed and this enables servicing and parking to be contained at this level, with ramped access positioned to the rear of the block to allow active frontages to be maximised.

19 The proposed form and massing is broadly supported and improves on that of the existing building. The proposed scale of the building sits comfortably with its immediate context and it is





noted that the applicant has worked to form an appropriate roofline treatment in response to DRP comments to address longer range views. The clear form and appearance is welcomed and the Council is encouraged to secure key details of curtain walling and in particular, the sloped arrangement of the rear upper levels in order to secure the highest possible quality of architecture.

## Access

20 Policy 7.2 of the London Plan requires all new developments in London to achieve the highest standards of accessible and inclusive design. An access statement needs to be submitted with the planning application that explains the design thinking behind the application and demonstrates how the principles of inclusive design, including the specific needs of disabled people have been integrated into the proposed development and how inclusion will be maintained and managed.

21 Part 03 of the design and access statement states that options are being explored to improve wheelchair access as part of the improved entrance to Pinnacle House and that the new entrance steps will be brought up to current Part M standards in robust high quality materials. It also states that new stainless steel handrails and building signage will create a more accessible and clearer entrance to the building and that the design team has engaged with an Architectural Liaison Officer from the Police force who will be reviewing proposals to meet Secured by Design standards as an ongoing exercise.

22 The preparation of the design and access statement seems at the early stage. However, the applicant should ensure that the statement should incorporate all the features of inclusive access and should demonstrate that disabled people will be able to access the proposed office redevelopment and the public space safely and easily in accordance with Approved Document M & BS 8300. The following matters need to be addressed as minimum requirements:

- The statement should clearly show how disabled people access each of the buildings safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc.
- The entrance to the building should be clearly defined and any glazing to the doors or side screens should incorporate high and low level manifestation in accordance with Approved Document M & BS 8300.
- *Lifts and vertical circulation:* Adequate passenger lifts that accommodate wheelchair/disabled users should be provided. The stairs of the buildings should be suitable for ambulant disabled use in terms of the appropriate rise and going of each step, visually contrasting nosing and handrails.
- *Level change across the site* – consideration should be given to removing the level change in the public realm without introducing substantial flights of steps and introducing physical barriers to the permeability of the site and create accessible public routes across the site (i.e. public realm gradients would not exceed 1:20).
- *Connectivity* - to the surrounding streets and public transport network - key issues are the connectivity to underground stations, bus stops, and taxi drop off, which should be safe and accessible for everyone.
- *Car parking* - provision and future management of blue badge bays taking into account changes in demand for bays in future. The parking plan and travel plan should address the needs of disabled people, such as designing the approach from the designated parking spaces to the entrance to be level with dropped kerbs.
- *Tactile paving* - the statement should set out principles for any shared surface areas that are proposed, making clear that tactile paving and clearly delineated pedestrian safe zones would be provided to ensure the safety of visually impaired and other disabled people.
- *WC facilities:* adequate accessible disabled toilets should be provided in accordance with Approved Document M recommendations.



23 The applicant should at least meet the above standards and agree that they are conditioned in order that the proposed redevelopment of the office complies with policy 7.2 of the London Plan.

## **Sustainable development/energy**

### Energy efficiency standards

24 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. The applicant is proposing improving the fabric performance of the existing elements, this is welcomed.

25 However, the applicant should explain how policy 5.9 of the London Plan has been addressed to avoid overheating and minimise cooling demand. The BRUKL for the new build element show that the solar gain limit is exceeded in a number of zones. Further passive measures should be considered in line with policy 5.9 to avoid the risk of overheating and an updated BRUKL sheet should be provided demonstrating that the solar gain limits will not be exceeded. The development is a mixture of new build (Part L2A) and refurbishment (Part L2B) elements. From the BRUKL sheets provided the modelled area of the new build extension is approximately 30% of the total floor area. As the extension is greater than 25% of the total useful floor area of the existing development then the CO<sub>2</sub> savings for the development as a whole should be calculated relative to the Part L 2013 baseline.

26 The applicant should therefore update the emission figures to a Part L 2013 baseline rather than the BER baseline used. See link for the latest guidance on refurbishment applications: <https://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202015.pdf>

27 The proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The applicant should model additional energy efficiency measures and aim for the development to exceed Part L 2013 Building Regulations compliance through energy efficiency alone. An updated BRUKL sheet for the updated efficiency measures (without ASHP and PV) should be provided to support the savings claimed. It is appreciated that the nature and level of carbon savings that can be achieved from refurbishments can vary considerably, however every effort should be made to improve the energy performance of the building and follow the energy hierarchies in policies 5.2 and 5.6 of the London Plan.

28 The applicant should note that heat pumps are considered a renewable technology in the energy hierarchy and should not be included in the 'be lean' figures. The 'be lean' case should instead assume gas boilers (91%) for both heating and hot water. The applicant should update the carbon emission figures accordingly.

### District heating

29 The applicant has stated that there are no existing or planned district heating networks within the vicinity of the proposed development. However, the development borders the Wimbledon District Heating opportunity area. The applicant should therefore ensure that the development is designed to allow future connection to a district heating network should one become available.

30 The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided

31 As stated above ASHP is considered a renewable and should not be included in the 'Be Clean' emission figures.



### Combined Heat and Power (CHP)

32 Due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

### Renewable energy technologies

33 The applicant is proposing to install Photovoltaic (PV) panels on the roof of the development. A roof layout plan detailing the location of the PV panels has been provided.

34 The applicant is also proposing to install Air Source Heat Pumps (ASHP) to provide heating and cooling. Future information should be provided on how the system will be designed to allow connection to a wider district heating network in the future. As noted above the applicant should revise the development emission figures in the energy statement and include the emission savings from the ASHP in this renewables part of the energy hierarchy.

### Overall carbon savings

35 A reduction of 33 tonnes of CO<sub>2</sub> per year in regulated emissions is expected, equivalent to an overall saving of 25%. However, the baseline needs to be updated using a Part L 2013 compliant baseline for the whole development.

36 The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should address the comments above and consider the scope for additional measures aimed at achieving further carbon reductions.

### **Transport for London's comments**

37 It should be noted that Wimbledon is included in the current Crossrail 2 safeguarding direction which was approved by the government this year. TfL and DfT are working up detailed plans and proposals for the route and development sites and this may result in increased service provision, enhanced accessibility, greater interchange and a need to provide higher density development in the vicinity of the station. The Council is also preparing a masterplan vision for the town centre which would incorporate the application site.

### Parking

38 There are currently 21 car parking spaces available on site, the applicant proposes to reduce this to 3 standard spaces, with one Blue Badge parking space in accordance with the London Plan requirement. Whilst TfL welcomes the reduction in spaces, considering the excellent 6b PTAL and services available in the vicinity of the site, TfL suggests this provision is reconsidered to further promote sustainable travel.

39 The application proposes 60 cycle parking spaces, shower and changing facilities all in accordance with the London Plan and this is welcomed by TfL. The applicant should provide a plan identifying the cycle route to the basement parking, TfL recommends this is segregated to reduce conflicts with vehicles. Additional information on the short stay / visitor parking provision and how this can be accessed is also requested.

40 As stated in the Transport Statement, Merton Council has funding for cycle improvements within the area, discussions are ongoing between the Council and TfL to decide how this money will be spent.

### Public transport

41 TfL has reviewed the predicted trip generation for the site provided within the Transport Statement. Considering the services available in the local area and the additional trips, it is not considered that the development will have a negative impact on the Public Transport Network, therefore no contributions are required. It should be noted that TfL should be consulted on any proposals to the highway or widening the footpath, to ensure that this does not have a negative impact on the bus routes operating in the area.



### Travel planning

42 The submission of a draft travel plan, which aims to promote sustainable travel to and from the site, is welcomed. TfL requests the final version, including all agreed measures therein should be secured, enforced, monitored and reviewed as part of the section 106 agreement. Considering the current car trips to the site, the travel plan should strongly look to reduce car dependency.

43 TfL requests a delivery and servicing plan (DSP) and construction logistics plan (CLP) are secured by condition. Both should be finalised in accordance with TfL guidance to ensure cycle safety measures are identified. For any conflict points identified on the delivery routes associated with the site in its construction and operational state, traffic and pedestrian management measures and cycle specific safety equipment should be considered and the detail provided through the CLP and DSP. Contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with other road users, in particular cyclists and pedestrians on the capital's roads.

### Community Infrastructure Levy

44 The Mayor has introduced a London wide Community Infrastructure Levy (CIL) will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Merton is £35 per square metre (gross internal area). The required CIL should be confirmed by the applicant and council once the components of the development have been finalised. More details are available via the GLA website <http://london.gov.uk/>. Merton Council adopted their Community Infrastructure Levy (CIL) on the 1st April 2014. The associated Regulation 123 list identified improvements to Wimbledon Station as one of the transport priorities for the CIL charge.

45 In summary, TfL expects car parking provision should be reduced and additional information on the short stay cycle parking and route to be provided. The final travel plan should be secure through the section 106, with DSP and CLP secured by condition for the application to be in accordance with the transport policies of the London Plan.

### **Local planning authority's position**

46 Merton Council planning officers have yet to confirm their position.

### **Legal considerations**

47 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**

48 There are no financial considerations at this stage.



## Conclusion

49 London Plan policies on principle of development - office use in a town centre, urban design, access, sustainable development/energy, and transport are the key strategic issues relevant to this planning application. The application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of development - office use in a town centre:** The proposed redevelopment of the building for continued office use is supported.
- **Urban design:** There are no strategic design concerns. The Council is encouraged to secure key details of curtain walling and in particular, the sloped arrangement of the rear upper levels in order to secure the highest possible quality of architecture.
- **Access:** The applicant should demonstrate how the proposed redevelopment of the office complies with policy 7.2 of the London Plan.
- **Sustainable development/energy:** A reduction of 33 tonnes of CO<sub>2</sub> per year in regulated emissions is expected, equivalent to an overall saving of 25%. However, the baseline needs to be updated using a Part L 2013 compliant baseline for the whole development. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should address the comments above and consider the scope for additional measures aimed at achieving further carbon reductions.
- **Transport:** Considering the services available in the local area and the additional trips, the development will not have a negative impact on the Public Transport Network, therefore no contributions are required. TfL requests car parking provision to be reduced and additional information on the short stay cycle parking and route to be provided. The final travel plan should be secured through the section 106, with DSP and CLP secured by condition for the planning application to be in accordance with transport policies of the London Plan.



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For further information, contact GLA Planning Unit (Development & Projects Team):

**Colin Wilson, Senior Manager (Development & Projects)**

020 7983 4783 email colin.wilson@london.gov.uk

**Justin Carr, Strategic Planning Manager (Development & Projects)**

020 7983 4895 email justin.carr@london.gov.uk

**Tefera Tibebe, Case Officer**

020 7983 4312 email tefera.tibebe@london.gov.uk

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