

PLANNING APPLICATIONS COMMITTEE 8 MARCH 2018

<u>APPLICATION NO.</u>	<u>DATE VALID</u>
17/P1718	16/11/2017
Address/Site	Ravensbury Estate, Morden, CR4 4DT
Ward	Ravensbury

Proposal: Outline planning application (with layout, scale and access for approval, expect in relation to parameter plans for height) for the regeneration of the Ravensbury Estate (on land to the west of Ravensbury Grove) comprising the demolition of all existing buildings and structures; erection of new buildings ranging from 2 to 4 storeys providing up to 180 residential units (C3 Use Class); provision of replacement community centre (up to 160 sqm of Use Class D1 floor space); provision of new public realm, landscaping works and new lighting; cycle parking spaces (including new visitor cycle parking) and car parking spaces, together with associated highways and utilities works. Landscaping works are also proposed to the east of Ravensbury Grove and along Hengelo Gardens.

Drawing Nos 0100 REV E, 0113 REV E, 0114 REV G, 0115 REV D, 0151 REV E, 0152 REV D, 0153 REV D, 0101 REV E, 0113 REV E, 0114 REV G, 0115 REV D, 0121 REV D, 0151 REV E, 0152 REV D & 0153 REV D.

Documents Submitted;

- Application Form and Certificates Nov-17
- Site Location Plan Nov-17
- Drawing List Feb-18
- Town Planning Statement (including Affordable Housing Statement and draft s106 Heads of Terms) Nov-17
- Open Space Table (Para 4.23) Feb-18
- Design and Access Statement (including Open Space, Lighting and Refuse Strategy) Nov-17
- Design and Access Statement Errata Sheet Nov-17
- Design Code Feb-18
- Townscape and Visual Impact Study Nov-17
- Townscape and Visual Impact Assessment Letter Feb-18
- Air Quality Assessment Nov-17
- Technical Note – Amendments to the Air Quality Assessment from the Maximum Parameters Accommodation Schedule Nov-17
- Statement of Community Involvement Nov-17
- Socio-Economic Analysis Nov-17
- Technical Note – Amendments to the Socio Economic Assessment from the Maximum Parameters Accommodation Schedule Nov-17

- Health Impact Assessment Nov-17
- Health Impact Assessment Addendum Dec-17
- Sustainability Statement Nov-17
- Energy Statement (incorporating Overheating Assessment) Nov-17
- Energy Technical Note Nov-17
- Daylight and Sunlight Assessment (incorporating Overshadowing Assessment) Nov-17
- Daylight and Sunlight Assessment Technical Note Feb-18
- Updated Flood Risk and Drainage Assessment (Issue 4) Feb-18
- Transport Assessment (including Parking Provision and Management, PERS Audit, and Framework Construction Logistics Plan) Nov-17
- Framework Residential Travel Plan Nov-17
- Arboricultural Impact Assessment Feb-18
- Preliminary Ecological Appraisal Nov-17
- Noise Impact Assessment Nov-17
- Demolition and Construction Management Plan Nov-17
- Utility Infrastructure Report Nov-17
- Heritage Assessment (incorporating Archaeological Assessment) Nov-17
- Ground Condition Assessment (Contamination and Stability) Nov-17
- Parking Management Plan Nov-17
- Response to GLA comments Dec-17
- Response to GLA Stage 1 Energy Comments Dec-17
- Overarching approach to energy Dec-17
- Letter Response to GLA Stage 1 Report Feb-18
- Response to TfL Comments Jan-18
- Existing and Proposed High Ways Adoption Overlay Nov-17
- Ravensbury Financial Viability Assessment Sep-17
- Merton Estate Regeneration Programme Financial Viability Assessment Sep-17
- Merton Estate Regeneration Programme Financial Viability Assessment - addendum report Nov-17
- Financial Viability Assessment Summary Report Dec-17
- Merton Estates Housing Tenure and Mix Dec-17
- Net Uplift in Units by Tenure based on Illustrative Maximum Accommodation Schedule Dec-17
- Merton Estates Project - Habitable Room and Floorspace Information for GLA Dec-17
- Internal Layout and Vehicle Movement Strategy Jan-18
- Sports Facilities Assessment Dec-17
- Sports Facility Assessment Dec-17

Contact Officer: Awot Tesfai

RECOMMENDATION

Grant Outline Planning Permission subject to s106 legal agreement and conditions.

CHECKLIST INFORMATION.

- Heads of Agreement: See section 29 for full heads of terms.
- Is a screening opinion required: No
- Is an Environmental Statement required: Yes
- Has an Environmental Statement been submitted: Yes
- Press notice: Yes

- Site notice: Yes, 30, including advertising conservation area and departure from policy
- Design Review Panel consulted: Yes
- Number of neighbours consulted: 8,323 property addresses across Merton including 653 property addresses in the vicinity of Ravensbury Estate
- External consultations: Greater London Authority (GLA), Transport for London (TfL), Environment Agency (EA), Sport England (SE), Department of Communities and Local Government (DCLG), London Borough of Wandsworth Council (LBW), Network Rail, Metropolitan Police, NHS England, Merton CCG, Historic England Greater London Archaeological Advisory Service, British Telecom, National Grid, Natural England, Thames Water, London Power Networks, Woodland Trust; Friends of Ravensbury Park; Wandle Valley Regional Park Trust; Wandle Industrial Museum; Watermeads Residents Association; Ravensbury Residents Association; Merton Centre for Independent Living; Wandle Valley Forum; Canal and Rivers Trust, London Boroughs of Lambeth, Croydon, Wandsworth, Sutton and the Royal Borough of Kingston upon Thames.
- Conservation Area: yes , a small part of the site is within The Parks sub-area of the Wandle Valley Conservation Area
- Public Transport Accessibility Level (PTAL): Level 3 (moderate)/2 (poor) on the TfL Information Database (On a scale of 1a, 1b, and 2-5,6a, 6b where zone 6b has the greatest accessibility)

1. INTRODUCTION

- 1.1 This application seeks outline planning permission with some matters reserved (appearance and landscaping) for the regeneration of Ravensbury Estate as set out in the development description. The parameter plans submitted for approval set out the height parameters. It is intended that the Design Code provides principles for the development through the Reserved Matters stages.
- 1.2 The application is brought before PAC due to the development being a departure from the development plan with regards to Ravensbury being located with a Flood Zone 3. Furthermore, Officers consider it is appropriate for the development to be determined by Committee due to the scale and complexity of the proposals which concern the Council's involvement in subsequent purchase notices being served. This major Outline Planning Application is referable to the Mayor of London for any further direction.

2. SITE AND SURROUNDINGS

- 2.1 The Ravensbury Estate covers a total area of 4.58 hectares (including the buildings which are to remain and the first phase which has secured a separate planning permission (ref: 16/P1968)). The outline application site comprises 3.21 hectares. The estate is situated alongside the River Wandle, between Morden Hall Park and Ravensbury Park with Morden Road wrapping around its western and northern perimeters.

- 2.2 Ravensbury Estate was originally constructed between the late 1940s and mid 1950s as part of the post-World War II housing boom, ownership and management of the Estate was acquired by Circle Housing Merton Priory in 2010 as part of a Housing Stock Transfer Agreement (HSTA) with London Borough of Merton
- 2.3 The existing site comprises of private gardens to houses and green spaces surrounding the flatted blocks. The Estate, as a whole, consists of 192 existing residential units (of which 97 are located within the outline application boundary), which are a mixture of two storey semi-detached and terraced family sized houses and two storey flats. The phase 1 site including a three and four storey 'walk up' maisonette flat / block (known as Ravensbury Court), which lies on the eastern side of Ravensbury Grove are not included within the outline application boundary. In addition the properties on Hengelo Gardens and 56 to 62 (evens) Ravensbury Grove are being retained and are not included in the outline application boundary.
- 2.3 There is also an existing community room on the estate (within the outline application boundary), situated at ground floor level, along Ravensbury Grove (western side). The community room provides approximately 84.5 sqm of floorspace. Surrounding the residential properties are areas of amenity grassland, informal planting beds, scattered semi-mature trees and hard standing consisting of pavements, roads and car parking. Located at the southern corner of the Estate there are a number of garages that are in disrepair and are not in use (these formed part of the first phase which as noted has secured planning permission separately).
- 2.4. The site is conveniently located a short walking distance from a number of bus stops, which are served by bus routes to a range of destinations. There are six bus routes and a night bus route that serve the site. Belgrave Walk and Phipps Bridge Tramlink stops are also located within 500m walking distance. Morden Underground Station is a 15-minute walk from the site. The site has a PTAL rating of up to 3 providing a moderate level of access to public transport links.
- 2.5. The vehicular access into the site is from Ravensbury Grove, which runs north to south through the Estate. Ravensbury Grove is an internal road, which is connected at the north to Morden Road that forms one of the main vehicular access roads within the area. The site is accessible on foot either from along Morden Road or from the pedestrian footpath along the edge of the River Wandle. Further afield there is also an existing pedestrian bridge over the back-channel connecting the estate to the footpath along the edge of the River Wandle.
- 2.6. The surrounding area predominantly comprises brick built two storey houses both to the north and the opposite side of the river. To the north-east of the site is a cluster of light industrial buildings ranging from three to five storeys in height. North-west of the site is Morden Hall Park and to the south-east is Ravensbury Park, both providing extensive publically accessible green open spaces and play opportunities. The Estate is located in close proximity to

many local amenities, which can be accessed on foot, for example, a small shopping parade is located immediately outside of the site along A239 Morden Road.

- 2.7 The Estate forms one of the three housing estates allocated for development in the Estates Local Plan DPD. The LBM Policies map shows that the site falls within an Archaeological Priority Zone and a small section of land that runs along the eastern part of the site is identified as Wandle Valley Conservation Area. There are also grade II listed buildings in the vicinity of the Site as well as locally listed buildings. The site falls within Flood Zones 2 and 3. To the south, there is a small area of designated Open Space (on the first phase site – outside the outline application boundary), and adjacent to the Estate to the south is a Green Chain, Metropolitan Open Land and the Wandle Valley Regional Park buffer. The area to the south and east of the Estate is designated Local Nature Reserve, Metropolitan Open Land, and Metropolitan Site of Importance for Nature Conservation, Open Space and Green Corridor.

3. **CURRENT PROPOSAL**

- 3.1 The Outline Planning Application seeks permission with some matters (appearance and landscaping) reserved. Outline planning permission is sought for the following; Layout, Scale; and Access.
- 3.2 The application seeks approval for up to 180 residential homes and up to 160 sqm of community (use class D1) floor space. The proposal also provides an illustrative scheme of 173 homes; however it is expected that through detailed design work and depending on the housing mix within the proposed flatted blocks this could potentially increase to 180 homes. It is worth noting that the proposal demonstrates an Illustrative accommodation schedules for the 173 unit and an Illustrative Maximum scheme of 180 units, as shown within the application submission. The internal layouts of the homes and community space will be developed further at Reserved Matters stage; however, indicative unit layouts are included within the design code.
- 3.3 Following EA consultation, amendments have been received which have resulted in most of the proposed properties located within the central, lower, part of the site to be raised from finished floor level in order to achieve EA's required flood risk mitigation measure. Overall the raised levels do not significantly affect the layout scale and massing of the proposed development, while reducing flood risk. The proposal as such has not significantly altered from the initial masterplan that was discussed at the 'Design Review Panel' on September 2016. As such the revised proposal which comprises of modest level adjustments would not have a serve impact on the character and appearance of the wider area in context with Ravensbury Park, Morden Hall Park, Wandle Valley Conservation Area or Morden Road and the scheme would be regarded acceptable in form, scale and visual amenities.

4. **PLANNING HISTORY**

- 4.1. Overall there are 14 planning applications within Ravensbury Estate as a whole which also includes properties along Ravensbury Grove and Hengelo Gardens. The most significant planning applications other than minor works are noted below in reverse chronological order;
- 4.2. **16/P2354** (Full Planning Permission) - Land at Ravensbury Grove Mitcham - PROVISION OF 36 TEMPORARY PARKING SPACES ON GRASS VERGES AND LAND WITHIN THE CURTILAGE OF NUMBERS 2-18 AND 36-50 RAVENSBURY GROVE ON EITHER SIDE OF THE ROAD, WITH DROPPED KERBS, VEHICULAR ACCESS AND ASSOCIATED LANDSCAPING – Grant Permission subject to conditions - 15/05/2017
- 4.3. **16/P1968** (Full Planning Permission) - 64-70 Ravensbury Grove, Ravensbury Garages and adjacent Land Mitcham - DEMOLITION OF GARAGES ON RAVENSBURY GROVE AND EXISTING FLATS AT 64-70 RAVENSBURY GROVE AND THE REDEVELOPMENT OF SITE TO PROVIDE 21 RESIDENTIAL UNITS (C3 USE) - COMPRISING 14 x FLATS AND 7 x DWELLINGHOUSES WITH THE 14 FLATS WILL BE SPLIT INTO 2 x PART THREE, PART FOUR STOREY BUILDINGS. PROVISION OF ASSOCIATED VEHICULAR ACCESS, PARKING, CYCLE AND REFUSE STORAGE AND LANDSCAPING – Grant Permission subject to S106 and conditions - 09/05/2017
- 4.4. **08/P2084** (Outline Planning Application) - Garages adjacent 11 Ravensbury Grove - OUTLINE PLANNING PERMISSION FOR THE CONSTRUCTION OF 9 THREE STOREY HOUSES (7 X 3 BEDROOM AND 2 X FOUR BEDROOM) ON THE SITE OF DISUSED GARAGES (ACCESS LAYOUT AND SCALE TO BE CONSIDERED) – Withdrawn by applicant - 03/10/2008
- 4.5. **MIT2957** (Retrospective) - 11 Ravensbury Grove Mitcham - 40 LOCK UP GARAGES – Grant permission subject to conditions - 16/03/1957.
- 4.6. **MIT4673** – (Retrospective) 11 Ravensbury Grove Mitcham - 32 LOCK UP GARAGES – Grant Permission subject to conditions - 29/04/1963
- 4.7. **MIT2095** (Retrospective) - 26 Ravensbury Grove - ERECTION OF 29 AGED PERSONS DWELLINGS AT RAVENSBURY ESTATE – Grant permission subject to conditions - 26/08/1953.

5. **CONSULTATION**

- 5.1. This Outline planning application was the subject of the following consultations;
- Conservation Area Consultation;
 - (Majors) Outline Planning Application Consultation;

- (Majors) Advertised as a departure application for public consultation.
- Site and press Notice - 30 site notices were displayed within and around the Ravensbury estate, advertising the planning application as above

5.2. **External Bodies**

- Crime Prevention Design Adviser
- Environment Agency
- Greater London Authority
- Historic England
- Greater London Archaeological Advisory Service
- Transport for London (TfL),
- Sport England
- Department of Communities and Local Government
- Metropolitan Police,
- NHS England,
- Merton CCG, Historic England Greater London Archaeological Advisory Service,
- British Telecom,
- National Grid,
- Natural England,
- Thames Water,
- London Power Networks, Association
- Woodland Trust;
- Friends of Ravensbury Park;
- Wandle Valley Regional Park Trust;
- Wandle Industrial Museum;
- Watermeads Residents Association;
- Ravensbury Residents Association;
- Merton Centre for Independent Living;
- Wandle Valley Forum;
- Canal and Rivers Trust
- London Boroughs of Lambeth, Croydon, Sutton, Wandsworth and the Royal Borough of Kingston upon Thames

6. **REPRESENTATIONS**

6.1. **Statutory Consultees**

- 6.1.1. **Environment Agency:** No objection subject to conditions The proposal has undergone significant changes in terms of raising the height of the proposed buildings in order to meet the Environment Agencies regulations of 1 in 100 years Climate Change + 300mm Freeboard. Following revised drawings and further consultation with the EA it was considered that EA are now satisfied with the proposed scheme and have no objections on the proposed re-development at Ravensbury Estate - Subject to the imposition of eight recommended conditions) relating to carrying out the development in

accordance with the Flood Risk Assessment, floodplain compensation scheme, finished floor levels de-risking and mitigating water contamination. These conditions are listed as Planning Conditions 12-20 not including Condition 15 at the end of this Committee Report.

6.1.2. **Greater London Authority:** The application is referable under the following categories of the Town and Country Planning (Mayor of London) Order 2008:

6.1.3. The GLA's Stage 1 recommendation states the following:

'The principle of the comprehensive estate renewal, which increases overall housing delivery, is supported'. The application would be fully compliant and in accordance with the Current London Plan if the following concerns are addressed;

Estate regeneration and affordable housing: The estate regeneration results in an uplift in affordable housing with replacement homes being provided on an equivalent basis. The applicant's viability assessment will be robustly interrogated to ensure the maximum amount of additional affordable housing is provided. Review mechanisms in accordance with the draft London Plan and the Mayor's Affordable Housing and Viability SPG will be secured.

Community use: The re-provided community facility must be secured in accordance with Policy Si of the consultation draft London Plan 2017.

Urban design: The overall design strategy is supported plans and design code demonstrates that a suitably high residential quality, amenity provision and public realm would be achieved. The scheme would preserve existing heritage assets. Robust conditions are required to secure the design commitments made by the applicant.

Climate change: Further information is required, including scope for further carbon savings, before an appropriate contribution to the Council's carbon offset fund is secured. Details of the drainage strategy also need to be secured by condition.

Transport: Further information is required in relation to trip generation assessment, bus stop assessment and cycling infrastructure improvements, together with a number of mitigation measures, conditions and obligations.

GLA Energy comments No objections, all items can be considered closed.

6.1.4. **Transport for London:** No objections raised from TfL; In summary, TfL welcome further discussions with the applicant and Merton Council on a range of issues including the TRICS assessment and outputs, bus stop relocation on Woodstock Way, bus stop assessment, Draft London Plan cycle parking standards and cycle infrastructure improvements.

6.1.5. **Sports England:** No objections

- 6.1.1. **National Trust:** No objections raised.
- 6.1.6. **Historic England / Greater London Archaeological Advisory Service:** It is recommended that there is a discernible on-going archaeological interest with the site mainly in respect of the prehistoric and industrial period potential of the area. Having reviewed the available information it is recommended that the archaeological interest can be conserved by attaching recommended conditions. On other matters Historic England have considered the application and do not wish to offer further comments In accordance with the Handling Heritage Applications Direction 2015 and the Town and Country Planning (Development Management Procedure)(England) Order 2015.
- 6.1.7. **Historic England/Development Management:** Specialist staff at HE have considered the information received do not wish to offer any comments on this occasion. As such HE have advised that this application should be determined in accordance with national and local policy guidance, and on the basis of the Councils specialist conservation officer.
- 6.1.8. **London Borough of Croydon:** no objections It is considered that whilst the proposals constitute a Major development as the proposals are a significant distance from the Borough boundary, the Council would not wish to comment on the proposals.
- 6.1.9. **Royal Borough of Kingston upon Thames:** No Objections raised.
- 6.1.10. **London Borough of Sutton:** No Objections raised.
- 6.1.11. **London Borough of Wandsworth:** No objections raised.
- 6.1.12. **London Borough of Lambeth:** No Objections raised.
- 6.1.13. **London Fire and Emergency Planning Authority:** No Objections raised.
- 6.1.14. **Metropolitan Police (Crime Prevention):** Having reviewed the design and layout of the application and taken into account the provisions of ADQ, there is no reason why this development would not be able to achieve the Secured by Design Gold or Secured By Design Silver awards. If planning permission is granted, I would like to seek to have a planning condition requiring that this development achieve Secured By Design accreditation.
- 6.1.15 **Network Rail:** No comments received
- 6.1.6 **Thames Water:** No objections “Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the

line of, or would come within 3 metres of, a public sewer – Thames Water have recommended informative to be attached to any such consent”.

6.1.7 Canal & River Trust: No objections The Trust does not own or manage the River Wandle, which we would expect to be in riparian ownership, therefore the Trust raises no objections to this Outline Planning Application.

6.2. LBM Consultees

6.2.1. **Environmental Health - Noise and Land Contamination:** No objections to the proposed scheme subject to the imposition of recommended conditions.

6.2.2. **Environmental Health - Pollution (air)** The proposed waste management system seems to be aesthetically pleasing, no objections raised subject to the imposition of recommended conditions.

6.2.3. **Environmental Health Waste** - A full waste management strategy with details of the location, size and the design of the residual waste and recycling container storage areas for each residential unit is required with this planning application. No objections raised subject to the imposition of conditions that captures the above.

6.2.4. **Transport & Highways** - No objections raised, however the development will require full Transport & Highways input and consultation regarding any areas of interaction and alteration of the existing public highway at reserved matters stage.

6.2.5. **Tree Officer** – Had initially raised some concerns with the survey of the existing trees and some of the tree works proposed to facilitate the proposed development. The applicants have since addressed the concerns the tree officer has noted the applicants revised plans. There are no further objections from the Councils tree officer however there were points raised that some of the trees along the northern part of Morden Road should be retained. As landscape is a reserved matter these aspects will be further examined at the reserved matters stage. Furthermore conditions have been attached to any such consent.

6.2.6. **Open Space and Biodiversity** – No objections subject to the imposition of conditions and informatives requesting further details to be submitted at reserved matters stage.

6.2.7. **Children’s Play Space** - Any doorstep play proposed within the public realm areas needs to be designed in accordance with the Mayor of London’s Play and Informal Recreation SPG and must be safely accessible. The applicant’s use of a 400m radius is not an adequate calculation as it doesn’t take into account the actual walking distance from the site for children. Approximate ‘actual walking distance’ from the estate to the play space in Ravensbury Park is between 320m and 618m. It was noted that there are a variety of play equipment’s at Ravensbury Park for all ages. The proposal would also provide informal play spaces around the public open spaces as well as with private courtyards. This

would also be further scrutinized at the reserved matters stage with the submission of more detailed plan drawings and documents.

- 6.2.8. **Economic Development** – Welcomes the study undertaken by Peter Brett on Health and Socio-Economic considerations, in particular that the development will introduce quality housing and dedicated open space that supports health and well-being in the community. Both estates are in deprived wards and new stock of this kind is welcomed. The economic benefits, particularly around local spend of new residents; council tax, disposable income and CIL are significant positives for the development and good for Merton in general.
- 6.2.9. **Energy & Sustainability** – The applicant has provided a clear commitment to achieving carbon emissions reductions compared to Part L 2013 and indicated that the development will be designed in accordance with the energy hierarchy detailed under Policy 5.2 of the London Plan. The applicant has indicated that 8% of the domestic emissions reductions will be achieved via energy demand reduction, which would demonstrate compliance with the fabric first approach (i.e. secure emissions reductions via energy demand reduction first, prior to exploring other methods of emissions reduction).
- 6.2.10. The applicant has acknowledged the requirement to achieve zero carbon standards and has indicated that carbon emissions reduction equivalent to a 39.5% improvement on Part L 2013 will be achieved on-site. This exceeds the current minimum requirement for onsite emissions reduction detailed under Policy 5.2 of the London Plan.
- 6.2.11. The submitted energy statement indicates that non-domestic development will also comprise a proposed community centre but there has been no inclusion of emissions information for non-domestic sources. This information should be included in the submitted energy statement at reserved matters stage. No objections subject to the imposition of conditions.
- 6.2.12. **Street Works:** No objections raised to this outline planning application.
- 6.2.13. **Urban design:** The proposal would be further assessed through detailed drawings at reserved matters stage in order to assess the appearance of the proposed buildings. Urban Design Officers would play an instrumental part in further assessments relating to appearance.
- 6.2.14. **Conservation & Urban Design:** No objections overall to the proposed development, however the proposed block on the northern part of the site along Morden Road would need to be carefully designed in terms of its appearance and ensure sympathetic style of appearance and consideration to adjoining statutory listed and locally listed buildings.
- 6.2.15. **Drainage and Flooding:** comments to follow
- 6.2.16. **Housing Needs:** Have raised no comments, although earlier discussions with Officers noted the following; Merton needs another 11,130 homes over the next 10 years, or 1,113 per annum, to meet the needs of

population growth (or 1,600 p.a. after market-signal adjustment). There is a need for 8,681 additional affordable homes in the borough over the next 10 years, or 868 per annum (backlog of need at 2017 + estimated newly arising need, minus estimated new lets and re-lets between 2017-2027). The proposal would provide a re-provision of the affordable housing units mostly through Social Rented units, which is considered the most favoured tenure of affordable housing. The proposal would also provide an adequate mix of units and an appropriate amount of three beds to be allocated social rented affordable housing. In this instance the proposals would be acceptable in terms of housing needs.

6.2.17. **Public Health:** We welcome that the Health Impact Assessment has looked at the affect of vulnerable families and individuals more during the regeneration and welcome that Clarion Housing have commissioned Merton Centre for Independent Living (MCIL) to help investigate how to best contact, support and accommodate disabled people and other vulnerable groups. More importantly that this research will inform not only their rehousing processes but the continued engagement of this this section of the population throughout the regeneration work and beyond. We welcome that the HIA has looked at the health benefits to the surrounding area also. We welcome the inclusion of the Monitoring section the HIA

6.3. **Neighbour Consultees**

6.3.1. Letters were sent out to 8,323 property addresses within Merton advertising the three Outline Planning Applications at Ravensbury, Eastfields and High Path. Of these, 653 neighbouring property addresses to Ravensbury Estate were consulted on this application. 5 representations in total have been received.

6.3.2. Of the 5 representations received, 4 have objected to the proposal on the following grounds, which are summarised in, *'Table 1: Objections Received'* and responded to where appropriate; otherwise assessed under the *'Assessment'* section of this report:

6.3.3. One letter of support has been received for the proposed redevelopment of the Ravensbury Estate. The letter of support was received by a resident on the estate (225 Morden Road, Mitcham). This resident is in support of the proposed scheme and regards the whole process to have taken too long.

Table 1: Objections Received

Objections received	Officers response
<p>Objections on behalf of the Tree Warden Group Merton to this outline application, which not only proposes felling of a substantial number of existing trees within the site that enhance and contribute to the</p>	<p>The proposed arboriculture assessment showing tree works has been assessed by the Councils Tree Officer. With reference to Plan Number 02015P_TPP_01F which relates to a tree protection plan, the</p>

<p>character of the area but also proposes to fell or carry out works to trees on the boundary within the neighbouring Ravensbury Park.</p>	<p>proposal only 'Fell' two trees that are sited by Ravensbury Park entrance from Morden Road, this to facilitate the proposed development. The proposal also shows that a significant number of trees would be provided through the site and boundaries to ensure adequate coverage of green landscape and integration with the natural landscape at Ravensbury park. As landscape is a reserved matter this would be further examined at reserved matters stage.</p>
<p>Objection: The proposal would adversely affect the estate, by changing its character. At present the extensive shared lawns and trees make it a pleasant place to live. There would be a corresponding loss of privacy, disturbance, and it is also likely to cause traffic and parking problems in the vicinity. In addition, the local infrastructure is not adequate to service the proposed development.</p>	<p>The plans shown in the proposed open space strategy reveals that there is a significant amount of open space proposed at Ravensbury. Currently the existing open space on Ravensbury comprises of 3880.4sq.m and the proposal would exceed this existing quantity of open space to provide a total of 6858.3sq.m of public open space on the estate. The proposal has been adequately designed in terms of scale, massing, relationship with neighbouring adjoining properties (as assessed in the main body of the officers report) and is not considered to cause a loss of privacy or disturbance on the amenities of existing or future occupants.</p> <p>The level and provision of parking for this proposed development is considered appropriate and compliant with policy. TfL have also been consulted and raise no objection on the transport and vehicle parking elements of the proposed development.</p> <p>The proposal would provide upgraded modern re-provision of the existing community centre which is currently in food use by residents of the estate and this would. As such the need for infrastructure has been recognised and is being improved and retained as</p>

	a necessary facility.
The proposed development would affect the character and appearance of Ravensbury as the buildings would be built too high.	The proposal is considered to be modest in scale, proportion, and height and would not be higher than the surrounding neighbouring trees, as such the proposal would not be considered to have a significant impact on the character and appearance of Ravensbury or the adjoining neighbouring surrounding.
Objection to the loss of green open space on the southern side of the site by Hengelo Gardens.	The removal of this small section of green space is considered modest and would not be highly visible or noticeable in its current location given that this is tucked away on the south-eastern side of Hengelo Gardens. The purpose of removing this minor part of the green space is to provide a turning head for vehicles on Hengelo Gardens. The need for such works has come out of consultation with local residents and in the interest of public highway safety. The works are considered part of overall highway improvements in the area. Furthermore, given that there would be additional open space provision in this area it is not considered that this modest loss of existing green space would have a significant impact on the wider ecology, biodiversity or nature conservation of the area.
Morden road is a very busy road, which often has accidents on (one happened just yesterday) and you are now suggesting to build even closer to the actual road. This will lead to fatalities without doubt,	This is fully noted and as part of the s106 heads of terms officers have applied the following terms; <u>Traffic Calming Measures</u>: the developer to introduce traffic calming to keep vehicle speeds low along the junction of Morden Road and Ravensbury Grove.
The visual aspect of these high rise flats is not something of the future but something very ugly & uninviting which would have been built many years ago. It will only attract the wrong type of resident.	The proposals seek to respect the form, scale and grain of the surrounding area, and would make a positive contribution to the character of the area and wider townscape. The proposed buildings vary in height from 2 to 4 storeys. The four storey buildings are focussed towards the

	<p>corners of the site adjacent to Ravensbury Park and opposite the Surrey Arms Public House, and along Ravensbury Grove, the three storey buildings are focussed along edges of the site on Morden Road and the two storey dwellings are situated towards the centre of the site. Proposed heights respond to the context of the site and the existing buildings on the Estate which are also between 2 and 4 storeys.</p>
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7. POLICY CONTEXT

The London Plan (2016)

7.1. The London Plan (2016) is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital for the next 20-25 years. The policies relevant to this application are:

- 2.3 Growth Areas and coordination corridors;
- 2.6 Outer London: vision and strategy;
- 2.7 Outer London Economy; 2.8 Outer London Transport;
- 2.13 Opportunity and intensification areas;
- 3.1 Ensuring Equal Life Chances for All;
- 3.3 Increasing housing supply;
- 3.4 Optimising housing potential;
- 3.5 Quality and design of housing developments;
- 3.6 Children and young peoples play and Informal Recreation Facilities;
- 3.7 Large residential developments;
- 3.8 Housing choice;
- 3.9 Mixed and balanced communities;
- 3.10 Definition of affordable housing;
- 3.11 Affordable housing targets;
- 3.12 Negotiation affordable housing on individual private residential and mixed use schemes;
- 3.13 Affordable housing thresholds;
- 3.16 Protection and enhancement of social infrastructure;
- 3.18 Education Facilities;
- 5.2 Minimising carbon dioxide emissions;
- 5.3 Sustainable design and construction;
- 5.7 Renewable energy;
- 5.13 Sustainable drainage;
- 5.15 Water use and supplies;
- 6.2 Providing public transport capacity and safeguarding land for transport;
- 6.3 Assessing effects of development on transport capacity;
- 6.7 Better Streets and Surface Transport;
- 6.9 Cycling;

- 6.10 Walking;
- 6.13 Parking;
- 7.2 An inclusive environment;
- 7.3 Designing Out Crime;
- 7.4 Local character;
- 7.5 Public realm;
- 7.6 Architecture;
- 7.8 Heritage Assets and Archaeology;
- 7.14 Improving air quality;
- 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes.
- 8.2 Planning Obligations;
- 8.3 Community Infrastructure Levy;

7.2. The new consultation **draft London Plan 2017-18** is in consultation until 02nd March 2018. Following the close of the consultation period, the next formal step will be the holding of the Examination in Public (EiP). This will be led by an independent panel, which is expected to take place by autumn 2018. The Mayor of London is likely to publish the new London Plan by autumn 2019. The GLA's Stage 1 response refers to policies within the new consultation draft London Plan 2017. For the purposes of the determination of this planning application, officers consider that while the consultation draft London Plan 2017-18 is a material consideration, it is at a first consultation stage. This report indicates if officers have considered that the policies within the draft London Plan are a material consideration that outweighs adopted policy. These policies are:

- Policy GG1 Building strong and inclusive communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a healthy city
- Policy GG4 Delivering the homes Londoners need 19
- Policy GG5 Growing a good economy 21
- Policy SD1 Opportunity Areas 28
- Policy SD10 Strategic and local regeneration
- Policy D1 London's form and characteristics 98
- Policy D2 Delivering good design 102
- Policy D3 Inclusive design 106
- Policy D4 Housing quality and standards 109
- Policy D5 Accessible housing 115
- Policy D6 Optimising housing density 117
- Policy D7 Public realm 122
- Policy D8 Tall buildings 126
- Policy D9 Basement development 131
- Policy D10 Safety, security and resilience to emergency 132
- Policy D11 Fire safety
- Policy D12 Agent of Change 136
- Policy D13 Noise
- Policy H1 Increasing housing supply 144
- Policy H2 Small sites 152
- Policy H3 Monitoring housing targets 159
- Policy H4 Meanwhile use 160

Policy H5 Delivering affordable housing 161
Policy H6 Threshold approach to applications 164
Policy H7 Affordable housing tenure 169
Policy H8 Monitoring of affordable housing 173
Policy H9 Vacant building credit 174
Policy H10 Redevelopment of existing housing and estate regeneration 175
Policy H11 Ensuring the best use of stock 177
Policy H12 Housing size mix 178
Policy H13 Build to Rent 180
Policy H14 Supported and specialised accommodation 185
Policy H15 Specialist older persons housing 186
Policy H16 Gypsy and Traveller accommodation 190
Policy H17 Purpose-built student accommodation 193
Policy H18 Large-scale purpose-built shared living
Policy S1 Developing London's social infrastructure 202
Policy S2 Health and social care facilities 204
Policy S3 Education and childcare facilities 208
Policy S4 Play and informal recreation 212
Policy S5 Sports and recreation facilities 214
Policy S6 Public toilets 218
Policy S7 Burial space
Policy E2 Low-cost business space 227
Policy E3 Affordable workspace 230
Policy E10 Visitor infrastructure 261
Policy E11 Skills and opportunities for all
Policy HC1 Heritage conservation and growth 268
Policy HC5 Supporting London's culture and creative industries 287
Policy HC6 Supporting the night-time economy 292
Policy G1 Green infrastructure 302
Policy G3 Metropolitan Open Land 304
Policy G4 Local green and open space 305
Policy G5 Urban greening 308
Policy G6 Biodiversity and access to nature 311
Policy G7 Trees and woodlands 313
Policy G8 Food growing 315
Policy G9 Geodiversity
Policy SI1 Improving air quality 320
Policy SI2 Minimising greenhouse gas emissions 324
Policy SI3 Energy infrastructure 329
Policy SI4 Managing heat risk 334
Policy SI5 Water infrastructure 336
Policy SI6 Digital connectivity infrastructure 341
Policy SI7 Reducing waste and supporting the circular economy 344
Policy SI8 Waste capacity and net waste self-sufficiency 347
Policy SI12 Flood risk management 359
Policy SI13 Sustainable drainage 361
Policy T1 Strategic approach to transport 402
Policy T2 Healthy Streets 403
Policy T3 Transport capacity, connectivity and safeguarding 406
Policy T4 Assessing and mitigating transport impacts 412

Policy T5 Cycling 414
Policy T6 Car parking 420
Policy T6.1 Residential parking 423
Policy T6.5 Non-residential disabled persons parking 429
Policy T7 Freight and servicing 430
Policy T9 Funding transport infrastructure through planning
Policy DF1 Delivery of the Plan and Planning Obligations

7.3. London Borough of Merton Estates Local Plan Adopted February 2018

Relevant policies are:

OEP 1 Vision
OEP 2 Strategy
OEP3 Urban Design Principles
EP R1 Townscape.
EP R2 Street network
EP R3 Movement and access
EP R4 Land use.
EP R5 Open Space.
EP R6 Environmental protection.
EP R7 Landscape
EP R8 Building heights.

7.4. London Borough of Merton Core Planning Strategy (2011)

The relevant policies in the Merton LDF Core Planning Strategy (2011) are:

CS.3 Morden;
CS.7 Centres;
CS.8 Housing choice;
CS.9 Housing provision;
CS.11 Infrastructure;
CS.12 Economic development
CS.13 Open space, nature conservation, recreation and leisure;
CS.14 Design;
CS.15 Climate change;
CS.16 Flood risk management;
CS.18 Active transport;
CS.19 Public transport;
CS.20 Parking servicing and delivery

7.5. London Borough of Merton Site and Policies Plan (2014)

The relevant policies in the Merton Site and Policies Plan (2014) are:

DM H2 Housing mix
DM H3 Support for affordable housing
DM C1 Community facilities

DM E2 Offices in town centres
DM E4 Local employment opportunities
DM D1 Urban design and the public realm
DM D2 Design considerations in all developments
DM D3 Alterations and extensions to existing buildings
DM F1 Support for flood risk management
DM F2 Sustainable urban drainage systems (SuDS) and; Wastewater and Water Infrastructure
DM T2 Transport impacts of development
DM T3 Car parking and servicing standards
DM T4 Transport infrastructure
DM T5 Access to the Road Network

8. MATERIAL PLANNING CONSIDERATIONS

8.1. National Planning Policy Framework (2012)

8.2. The National Planning Policy Framework (2012) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions. It contains a presumption in favour of sustainable development, described as *"a golden thread running through both plan-making and decision-taking."*

8.3. For decision-taking the NPPF (2012) states that the presumption means *'approving development proposals that accord with the development plan without delay'* and where the Development Plan is *'absent, silent or relevant policies are out of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole'*.

8.4. The whole of the NPPF (2012) is potentially material to this application, but the specific policy areas considered directly relevant are as follows:

- Building a strong, competitive economy;
- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design; and
- Promoting healthy communities.

8.5. Other documents and guidance

8.6. Mayors Affordable Housing & Viability SPG

8.7. The current London Plan seeks to maximize affordable housing provision in London and deliver mixed and balanced communities as set out in policies 3.9, 3.11 and 3.12. A consultation on this SPG ran from 29 November 2016 to 28 February 2017.

8.8. Mayors Housing SPG

8.9. The Housing SPG was published in March 2016 following publication of the Further Alterations to the London Plan (FALP) and the Minor Alterations to the London Plan (MALP). It provides guidance on a range of strategic policies including housing supply, residential density, housing standards; build to rent developments, student accommodation and viability appraisals. This SPG replaced the 2012 Housing SPG and the Mayor's Housing Standards Policy Transition Statement.

8.10. Mayors Sustainable Design & Construction SPG

8.11. This SPG provides guidance on the implementation of London Plan policy 5.3 - Sustainable Design and Construction. It also features guidance on a range of other policies, primarily in Chapters 5 and 7, which deal with matters relating to environmental sustainability.

8.12. Mayors Play and informal Recreation SPG

8.13. The guidance supports the implementation of the London Plan Policy 3.6 on 'Children and Young People's Play and Informal Recreation Facilities,' and other policies on shaping neighbourhoods (Chapter 7 of the London Plan), in particular Policy 7.1 on Lifetime Neighbourhoods.

8.14. Mayors Homes for Londoners Draft Good Practice Guide to Estate Regeneration

8.15. This is a draft Guide for consultation. Following consultation, a final version will be published by the Mayor. The document informs good practice in estate regeneration projects which will typically fall into three broad categories: maintaining good quality homes; supporting the supply of new housing; and improving the social, economic and physical environment in which those homes are located.

8.16. London Borough of Merton 'Archaeology SPD' (Part 1 & 2) 2004

8.17. This Guidance Note is intended to provide information and advice on the importance of archaeology when developing a site within the London Borough of Merton. The Guidance Note is divided into 2 Sections, the first explains the importance of archaeology, both nationally and in the local context and outlines Merton's archaeological heritage. The second Section sets out the Planning Framework in relation to the development process and provides advice and guidance to owners and developers on the processes involved.

8.18. Wandle Valley Conservation Area character assessment,

8.19. Character assessments are useful tools that not only set out the specific characteristics for which an area has been designated as a conservation area, but also help the Council to assess the impact of

development proposals on the character or appearance of a conservation area. The Wandle Valley conservation area has been divided into six sub areas, of which No.5 “The Parks”, covering Morden Hall and Ravensbury Parks, relates to this scheme. The assessment aims to fulfil four key roles:

- to outline and explain the historical development of the area;
- to define the special character and interest of the conservation area, and its surroundings, in relation to its architecture, topography, open spaces and townscape and the relationships between them;
- to, on the basis of this assessment, to review of the existing conservation area boundaries; and
- to identify opportunities for the preservation and enhancement of the area.

8.20. Merton’s Cabinet resolved to approve amendments to the Wandle Valley Conservation Area Character Assessment, including boundary alterations, at their meeting on 25 June 2007. This included the area around “The Parks, where the approved alteration to the boundary incorporated the full width of Morden Hall Road and Morden Road including grass verges and footways. Part of this is within the red line of this planning application boundary.

9. PLANNING CONSIDERATIONS

9.1. Key Planning considerations;

9.2. The main issues which shall be examined within this report relate to the following:

9. Principle of Development and Land Use

10. The acceptability of the development on the site including the proposed mix of accommodation;

11. The acceptability of the level of affordable housing on the site including the proposed tenure;

12. The acceptability of the scheme in terms of; Scale, Layout and Access;

13. Reserved Matters (Appearance and Landscaping)

14. Parking and Transport considerations;

15. Provisions of residential and community use;

16. Residential Amenity;

17. Standard of Accommodation and Future Occupiers;

18. Nature Conservation;

19. Heritage;

20. Public Open Space & Amenity;

21. Noise;

- 22. Sustainability and Climate Change Mitigation;**
- 23. The acceptability of the scheme in terms of the environmental impacts; Flood Risk, Air quality, Ecology and Biodiversity, Land contamination and remediation,**
- 24. Accessibility and Inclusivity;**
- 25. Trees;**
- 26. Refuse and recycling;**
- 27. Archaeology;**
- 28. Secured by design;**
- 29. S106;**
- 30. Conditions & Informatives;**

9.3. Principle of Development and Land Use

9.4. By virtue of s38 (6) of the Planning and Compulsory Purchase Act (2004), the starting point for the consideration of this outline planning application is the Development Plan. The Council is required to make decisions in accordance with the Development Plan unless other material considerations indicate otherwise. The Development Plan for the London Borough of Merton comprises:

- The London Plan (2016);
- Merton Estates Local Plan 2018
- Merton LDF Core Planning Strategy (2011)
- Merton Site and Policies Plan (2014)
- Any other supporting and relevant guidance.

9.5. In accordance with the Policies Map of the Merton's Local Plan, the site is designated as:

- Conservation Area: small part within Wandle Valley CA.
- Flood Zone 3
- Archaeological Priority Zone
- Green Corridors
- Local Nature Reserves

10. The acceptability of the development on the site including the proposed mix of accommodation.

9.6. Since 2014 the Council has been exploring the regeneration of the Ravensbury estate and two other large housing estates managed by the applicant (Eastfields and High Path Estates) in consultation with residents, the Mayor of London, TfL and Clarion (the applicant, previously known as Circle Housing Merton Priory). This was carried out via Merton's Estates

Local Plan, which started in 2014 and following extensive public consultation and an independent examination, was formally adopted in February 2018.

- 9.7. Merton's Estates Local Plan's purpose is to shape and guide any redevelopment proposals on this and the other two estates that come forward within the next 10-15 years. The plan was adopted by Merton Council in February 2018 and is a material consideration in planning, for the delivery of new homes and to meet housing targets, improve the building fabric and to improve infrastructure on the three estates.
- 9.8. When Merton Council transferred its housing stock to Clarion, part of the transfer agreement was for Clarion to improve the quality of accommodation up to Decent Homes standard. Clarion identified that the work required significant maintenance, refurbishment and financial investment to achieve the required standard and narrowed down their options to the most cost effective way of delivering longer term sustainable Decent Homes standards through regeneration which allows for the provision of new, well designed, energy-efficient homes that will meet the needs of residents now and in the future.
- 9.9. Part of the justification for the partial regeneration of Ravensbury estate specifically was the construction of part of the Estate as Orlit Homes, a form of construction that has generally been declared defective. The Estates Local Plan was adopted by resolution of full council in February 2018 and supports the partial regeneration of Ravensbury Estate, an area covering all of the Orlit homes and some of the brick built homes, which have already been the subject of a planning approval 16/P2354.
- 9.10. Paragraph 1.33 of the adopted Estates Local Plan states, *'It is the council's view, supported by Clarion Housing Groups evidence that whilst incremental refurbishment and Decent Homes works would improve the internal housing quality in the short to medium term, regeneration provides an opportunity to deliver comparatively more significant positive changes to the three neighbourhoods and a once in a generation opportunity to improve the quality of life for current and future residents.'*
- 9.11. A key principle of the estate regeneration, as set out in Estates Local Plan Policy OEP 2 Strategy (c.) is that development proposals are consistent with a single linked regeneration programme for all three estates. Paragraph 2.8 of the Estates Local Plan clarifies that the regeneration of all three estates as part of a single comprehensive programme has been presented to the council as the basis of being able to viably deliver regeneration and that it is on this basis that the council is considering deliverability. The applicant's viability assessment, and the council's independent review of the same, links the regeneration of the three estates on viability grounds, with High Path providing surplus to fund the regeneration of Eastfields and Ravensbury.
- 9.12. Alongside this in Estates Local Plan policy OEP.2. para 2.10 states *"A key expectation of any regeneration proposal that comes forward will be a commitment to keeping the existing community together in each neighbourhood and for existing residents to have a guaranteed right to return to a new home in their regeneration neighbourhood"* Assessment of the

quantum and mix of affordable housing has had regard to this Local Plan policy requirement and one of the overarching Heads of Terms for all three estates is to prioritise the rehousing of existing residents within their estates on a like-for-like basis.

- 9.13. A string of benefits related to regeneration are identified in the ELP para. 1.34, including high quality well-designed neighbourhoods, wider housing mix, more private space for residents, better quality green spaces and community facilities and the creation of job opportunities.
- 9.14. This is in line with paragraph 111 of the National Planning Policy Framework (NPPF) which encourages the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of a high environmental value.
- 9.15. The proposal is in accordance with Core Planning Strategy 'Strategic Objective 3' which seeks to provide new homes and infrastructure within Merton's residential areas, through physical regeneration and effective use of space. In order to meet the aspirations of the strategic objective the following is expected to be delivered through the plan period; provision of higher density new homes and associated infrastructure and social facilities, supporting incremental growth in residential areas across the Borough, protecting areas of the Borough for uses other than residential and delivering community services and infrastructure to support new homes.
- 9.16. Policy CS9 of Core Planning Strategy paragraph 18:41 recognises opportunity areas for new residential developments to be sited around Morden Town Centre and through regeneration of Brownfield sites. Consultation draft London Plan policy H.10 supports managed intensification of residential development through applying higher density developments in key brownfield regeneration sites. Specifically, the proposal would enable the net gain of an additional 83 units whilst improving quality of accommodation across the site.
- 9.17. In terms of the proposed demolition, officers accept that the existing buildings are not unique insofar as they are post war two storey dwellings and purpose built flats, with some of the properties comprising of 'Orlit Homes', which were discontinued in 1980's as these were considered inadequate standards of housing that were not built to last. The 97 properties under this proposed regeneration initiative comprise of two storey terraced and semi-detached properties including purpose built blocks of flats, which are sited within an area that is characterised by two to four storey dwellings and purpose built flats immediately adjoining the site on Hengelo Gardens and Ravensbury Grove. Further afield the surrounding area comprises of a mixture of two and three storey buildings. The Wandle Valley Conservation Area (The Parks section) extends into the site for an element of carriageway, footway and landscaping fronting Morden Road but does not include any buildings within the conservation area. It must be noted that aside from their modest scale, the buildings do not possess any significant architectural quality and their contribution to the visual amenity of the area is considered neutral to negative.

9.18. For the reasons outlined above, officers are of the view that the proposed redevelopment of the site would be acceptable in principle. The proposal would represent a more efficient use of land, aligning with the strategy and land use based policy objectives of the Estates Local Plan 2018 and Core Planning Strategy Objectives 2011, in addition to the sustainable development mandate provided by the NPPF 2012.

Housing Mix

9.19. Paragraph 9 of the NPPF states that sustainable development involves seeking positive improvements in the quality of the built environment including widening the choice of high quality homes. The NPPF recognises that to create sustainable, inclusive and diverse communities, a mix of housing based on demographic trends, market trends and the needs of different groups should be provided.

9.20. At the regional level, London Plan Policy 3.8 states that boroughs should seek to ensure that new developments offer a range of housing choices in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.

9.21. London Plan Policy 3.9 further seeks a more balanced mix of tenures in all parts of London. This is emphasised within the Mayor's Housing SPG which provides further guidance to aid the delivery of a wide choice of quality homes and a mix of housing that meets local and strategic demand.

9.22. At the local level, the Council's Sites and Policies DM H2 requires mixed and balanced communities and sets out the Council's priority for a choice of housing with respect to dwelling size and type in the borough. This policy recognises the need of housing of families with children, single person households and older people by providing a mix of dwelling sizes. Policy DM H2 reiterates Core Planning Strategy Policy CS8 and sets out the Council's preferred housing mix for mainstream market housing schemes which states that there should be a varied mix of units across the development, with the indicative percentage being as follows: 33% 1 bedroom units, 32% 2 bedroom units and 35% 3 bedroom units.

9.23. This Outline Planning Application (including layout, scale and access) for Ravensbury seeks approval for a maximum of 180 new homes. The applicants have prepared an indicative masterplan demonstrating that 180 new homes could be delivered in the following sizes as set out below. This indicative maximum masterplan has been used to assess many aspects of compliance with the Statutory Development Plan and other material considerations, including housing mix.

Table 1 – Housing mix: Ravensbury illustrative maximum scheme

Illustrative maximum scheme for Ravensbury	1- bed	2- bed	3- bed	4- bed	Total number of units	Total number of habitable rooms
New homes	67	29	67	17	180 homes	662 habitable rooms
% unit size	37%	16%	37%	9%		

9.24. The percentage of three bedroom, family units and single person units are considered to be consistent with policy requirements. Although the percentage of two bedroom units are lower than the policy requirement, nevertheless 16% of the proposal would comprise of two bedroom units. Taken as a whole, the proposed housing mix has been developed following careful consideration of the estate regeneration requirements to offer existing residents like-for-like properties as well as local characteristics of the site, market trends and demands, demographics and the desire to optimise the development potential of this brownfield regeneration site.

9.25. Overall, the indicative mix provides a range of unit types and sizes across the development and is considered appropriate for this regeneration scheme and for the borough. The variety of units proposed would assist in creating a mixed and balanced community whilst meeting identified local needs, in accordance with the objectives of the London Plan Policies 3.8 and 3.9, Core Planning Strategy Policy CS8, Sites and Policies Plan DM H2.

9.26. It should be noted that while the applicant has presented an indicative housing mix as part of this Outline Planning Application incorporating layout, scale and access, this precise housing mix is not for final approval as part of this Outline Planning Application. Over the 10-15 year lifetime of this project there is likely to be changes to many of the elements that influence housing mix, including statutory planning policies, the needs of existing residents, housing need and demographic trends in Merton, development viability, guidance and other material considerations. At each Reserved Matters stage the applicant will be required to specify the housing mix proposed for that phase, and that will be considered by the Local Planning Authority against the statutory development plan and other material considerations in place at the time of the application. This Outline Planning Application is accompanied by Heads of Terms that require the applicant to address this.

11.0 Affordable housing on the site including the proposed tenure

9.27. The NPPF (paragraph 47) states that local authorities should act to “boost significantly the supply of housing” and use their evidence base to ensure that

Local Plan documents meet “the full, objectively assessed needs for market and affordable housing.”

- 9.28. London Plan Policy 3.11 seeks to maximise affordable housing provision to ensure an average of at least 17,000 additional affordable homes per year across London.
- 9.29. Policy 3.11 also promotes a strong and diverse intermediate housing sector and sets out that 60% of affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. The policy also requires local authorities to set an overall target for affordable housing provision as well as separate targets for social rented and intermediate housing. Policy 3.13 of the London Plan sets a standard affordable housing provision threshold of sites with capacity to provide 10 or more units.
- 9.30. London Plan Policies 3.9, 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units and provide for mixed and balanced communities.
- 9.31. The Mayor’s Affordable Housing Viability SPG, 2017 introduces a threshold approach to viability, where the approach to viability information differs depending on the level of affordable housing provision being provided. The SPG introduced a fast-track route to applications that meet or exceed 35% affordable housing provision.
- 9.32. Applicants who do not meet this minimum threshold of affordable housing provision or require public subsidy to do so, must submit detailed viability information to be scrutinised by the LPA and potentially the Mayor, to determine whether a greater level of affordable housing could viably be supported. The applicant submitted a detailed viability assessment with this outline planning application and the Council has employed independent viability assessors to scrutinise the results.
- 9.33. The SPG requires that where permission is granted, review mechanisms should be applied to ensure that the maximum reasonable amount of affordable housing, up to 50 per cent is provided. A two stage viability review assessment; an early stage review and a late stage review, will be required. The SPD also allows for mid-term reviews for longer term phased schemes such as this Estates Regeneration. This application is being recommended for grant therefore a review clause is set out as part of this application’s s106 agreement in line with the Mayor’s SPG.
- 9.34. The SPG also sets out that, where the Mayor considers that affordable housing opportunities for affordable housing may have been missed for reasons such as the unsatisfactory provision or insufficient scrutiny of viability information, the Mayor may choose to ‘call in’ the application, which means that that he is to be the Local Planning Authority for the purposes of determining an application.

- 9.35. Policy CS 8 within the Core Strategy states that for new development involving housing of 10 or more dwellings the affordable housing target is for 40% of the units to be affordable of which the desired tenure mix should be 60% social rented and 40% intermediate. Furthermore, the policy states that in seeking affordable housing provision the Council will have regard to site characteristics such as site size, site suitability and economics of provision such as financial viability issues and other planning contributions.
- 9.36. Policy CS 9 states that the Council will support the provision of well designed housing, located to create socially mixed and sustainable neighbourhoods, including the redevelopment of poor quality existing housing and not support proposals that result in a net loss of residential units, or net loss of affordable housing units.
- 9.37. Policy DM H3 titled 'Support for affordable housing' sets out that new development should provide affordable housing in accordance with the requirements of the London Plan and the Core Planning Strategy Policy CS8.
- 9.38. The Ravensbury regeneration proposes in total 92 of the 180 additional residential units as affordable units; 51% on a unit basis and 54% on a habitable room basis. As a total of 89 affordable homes are proposed for demolition, this results in a net gain of six affordable homes. (This does not include Phase 1 scheme 16/P1968 which provides a total of 21 units, 18 (86%) of which are affordable.) The affordable homes will be delivered largely as socially rented affordable housing to provide replacement homes for the existing tenants of the part of Ravensbury that would be displaced by the regeneration proposals. As there are no existing intermediate tenures to be decanted, therefore no intermediate tenures are proposed. The applicant has committed to providing new homes to existing social tenants at the same rental levels as their existing tenancies. . All units, irrespective of tenure, would be designed and built to the same specification. These measures would ensure that the socially rented units are genuinely tenure blind and would assist in providing a more mixed and balanced community within the scheme. The level and mix of affordable housing provision has been carefully considered having regard to viability, planning policy guidance, local housing need particularly of households affected by the regeneration and market requirements.

Table 2 – Housing mix and tenure: Ravensbury illustrative maximum scheme (incorporates Table 1)

Illustrative maximum scheme for Ravensbury	1- bed	2- bed	3- bed	4- bed	Total number of units	Total number of habitable rooms	% affordable and private by unit	% affordable and private on a habitable room basis
Affordable	34	10	35	13	92	355	51%	54%
Private	33	19	32	4	88	307	49%	46%

TOTAL	67	29	67	17	180 homes	662 habitable rooms		
% unit size	37%	16%	37%	9%				

9.39. With a total of 180 units, the scheme would provide 51% of the proposed residential properties for affordable housing, with a net gain of six affordable homes. (For information, this does not include Phase 1 scheme 16/P1968 which provides a total of 21 units, 18 (86%) of which are affordable.) London Plan Policies 3.9, 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units and provide for mixed and balanced communities. Merton's Core Planning Strategy policy CS.8 seeks a borough-wide target of 40% having regard to have regard to site characteristics such as site size, site suitability and economics of provision such as financial viability issues and other planning contributions.

9.40. Applicants who do not meet this minimum threshold of affordable housing provision or require public subsidy to do so, must submit detailed viability information to be scrutinised by the LPA and potentially the Mayor, to determine whether a greater level of affordable housing could viably be supported.

9.41. The applicant submitted a detailed viability assessment with this outline planning application and the Local Planning Authority has employed independent viability assessors to scrutinise the results.

9.42. A 30-page summary of the applicant's viability assessment is available online. The assessment concluded that the development would be unviable and in deficit given that profit within the development would come forward over a number of years as opposed to being upfront as a traditional build to sell model.

9.43. As set out in Estates Local Plan 2018, policy OEP.2 the council is considering the three estates as part of a single linked regeneration programme in the applicants viability assessment, the regeneration of the High Path Estate is financially more viable than Eastfield or Ravensbury Estates. In order to ensure that all three progress to delivery cross subsidisation is needed so that surpluses from High Path could be used to plug viability gaps in Ravensbury and Eastfields. Comprehensively, the three estates when taken as a whole, provide 27% affordable homes or 726 social and affordable rented units. If the three estates were redeveloped on an individual basis, it would not be possible to deliver the programme as proposed through the outline planning applications including the Ravensbury Estate

9.44. This regeneration programme is proposed to take place over the next 10-15 years and the costs and values associated with this scheme will change over this time. As set out above In order to ensure that any future financial benefit would result in an increase in affordable home, an affordable housing financial viability review mechanism is included as part of the planning obligations for

this proposal and is included as a Head of Term within this report. **Condition 12** requires the applicants to comply with the Councils requirements on accommodation schedule mix.

9.45. Affordable Housing Review Mechanism

9.46. The Mayor's Affordable Housing and Viability SPG states that in order to maximise affordable housing delivery in the longer term and to acknowledge the potential for significant changes in values in the housing market the use of review mechanisms should be applied within s106 'Heads of Terms', which is also fully supported in the London Plan.

9.47. Review mechanisms allow increases in Section 106 contributions to reflect changes in the value of a development from the date of planning permission to specific stages of the development programme. Such approaches are intended to support effective and equitable implementation of planning policy while also providing flexibility to address viability concerns such as those arising from market uncertainty.

9.48. It is noted that the GLA's comments on the planning applications for each of the three Merton estates draws attention to the need to put in place financial viability review mechanisms in accordance with the draft London Plan and the Mayor's Affordable Housing and Viability SPG. The SPG contains a series of formulas which should provide a useful set of principles around which review mechanisms can be developed.

9.49. The January 2018 BBP review of the Financial Viability Assessments highlights the high sensitivity of financial performance to changes to variables which will inevitably arise due to a range of policy, market and economic factors over the duration of the regeneration programme. Whilst the January 2018 review concluded that there was no financial headroom to provide additional affordable housing and planning gain at this stage, this situation could change over the 10-15 year lifetime of the project and it is possible that future phases may be able to support additional contributions.

9.50. For these reasons, the LPA will be putting in place an effective review mechanism for each phase of the development and a mechanism to ensure that all three estates are progressed; this is part of the Heads of Terms for this report. This will be robust and have longevity over the duration of the programme. There will be a need for an agreed 'financial model', agreed thresholds/trigger points and formulas for converting surpluses into additional planning gain. The timing of reviews would also be considered.

12.0 The acceptability of the scheme in terms of the access, layout and scale;

12.1 Access (Including Parking and Transport Improvements)

12.2 A key design objective in developing the scheme has been to significantly improve connectivity and integration from and within the site to the surrounding area. The outline scheme is therefore based on the principle of increased permeability within the site with buildings fronting an open space with front doors and windows providing active frontages over such spaces.

12.3 The submitted plan for the approval of Access confirms the road hierarchy network.

12.4 The proposal has raised the levels of the properties in order to address the flood risk concerns raised by Environment Agency and LBM Flood Risk and Drainage Officer. The raised levels are regarded to be a modest increase from the current site finished floor levels. The access of the proposed buildings would not be compromised as a result of the level changes and provision of adequate access is provided throughout the proposed development, All proposed access have been designed to address inclusive design and mobility access.

12.5 Vehicular Access

12.6 This Plan illustrates that vehicular access will only occur in accordance with the following arrangements via the existing main access at the junction of Ravensbury Grove and Morden Road located on the northern boundary of the site and emergency access/exist points to be located on the western boundary of the site. The retained Ravensbury Grove access is the primary route with a new network of secondary vehicle routes across the site.

12.7 Cycle Access

12.8 New proposed cycle connections are thought to be sited adjacent to the emergency entry/exit points on the western boundary of the site, as well as on the southern boundary of the site in order to provide improved cycle links with the river Wandle.

12.9 Pedestrian Access

12.10 Pedestrian access is provided across the whole site including wherever primary and emergency access routes are planned. These pedestrian routes will be clearly defined by appropriate surface materials including shared surfaces in certain areas. Some of the pedestrian access points are proposed to improve legibility of routes particularly on the southern part of the site enabling improved connections with the open space element surrounding river Wandle.

- 12.11 It is also worth noting although not part of the red line boundary that it is considered a new link bridge would provide a significant contribution to the overall access improvements of the site and surrounding area. This would be secured and delivered through S106 contributions and conditions in order to ensure improved sustainable means of access from the development site to Wandle Road.
- 12.12 Access into all the building blocks would be served via the main street frontage; some of the blocks however would have more than two entry points to provide secondary access points into the buildings. Vehicular parking to the blocks would be sited close to the entry access of each block particularly in the case of the disabled access units to ensure that those units are DDA compliant. The dwellings would comprise of conventional access with a mixture of on-street and off-street vehicle parking provision.
- 12.13 Clearly marked access points have been shown for each of the dwellings proposed in this scheme, which would have direct access from the main street. It is noted that some of the dwellings however would comprise of access from the side profile of the under-croft which are designed to accommodate vehicular parking bays. Although it is considered more appropriate to provide direct access from the street, in this instance it is thought that the provision of such access lends itself adequately to this style of design rational. Other elevational treatments could also be incorporated to these styles of dwellings, which would be assessed later in the reserved matters application under appearance. The elevational treatments would be carried out in the form of appropriately proportioned and symmetrically placed windows in order to enhance active frontages along the street.
- 12.14 Officers are satisfied with the access arrangements as it would not create any new vehicular entrance or exit points. The current car ownership in Ravensbury is identified as being 0.8 vehicles per household and this is expected to remain at a comparable level following the redevelopment. Although there is expected to be uplift in vehicle use given the additional residential development, however the balance between cars and residents is still proportional and comparable to existing.
- 12.15 Therefore in this instance officers are satisfied that the proposed development regarding trip generation/vehicular movements will remain on an acceptable level and it is considered that the residential units permitted for car parking provision would not result in a detrimental impact on the local highway network or pedestrian safety in terms of access and transport provision throughout the site. As such the proposals would accord with Policy EP R3 Movement and Access of the ELP Adoption 2018, as the overall design of the scheme in terms of access would ensure improvements to pedestrian routes across the estate and to nearby parks, bus and tram stops, with routes being linked into the proposed and existing street networks. Entrance access into the Ravensbury Park has also be sensitively planned into the wider scheme to provide a positive contribution in terms of legibility and provide enhanced amenity, safety and overall biodiversity the surrounding open space. This would be in line with policies outlined within Policy EP R3 of the ELP Adoption 2018

12.16 Layout

- 12.17 Policy EP R3 of the Estates Local Plan 2018 sets out that development proposals should provide physical and legible connections with surrounding streets, paths and neighbouring development. The layout and block structure of proposals should be coherent with active street frontages and a clear distinction between public and private spaces.
- 12.18 The proposed layout of the scheme has been developed following a detailed contextual analysis of the site and surrounding area, including analysis of its opportunities and constraints. This also takes into consideration the physical constraints of the river and park. The estate is bound by Morden Road on the northern and western boundary of the site and therefore the layout of the scheme had to ensure active frontages along these streets in order to inform a design that contributed visually to the character and appearance of the street scene along Morden Road. The new proposal was designed to ensure that the layout and access contributed to provide clear connections that reduced the current detached make-up of the estate.
- 12.19 The proposed layout has evolved through close consultation with officers, the GLA and a design panel review of the proposed development. The proposed layout has been designed to maximise active frontages and natural surveillance along the new and retained streets. As part of the new layout two new streets have also been formed (east to west) which accords with the Estates Local Plan achieving overall connection improvements on site, whilst having adequate barriers in place to avoid through traffic routes.
- 12.20 This proposal complies with the provisions of Local Plan Policy 7.1, and ELP Policy OEP 3 and EP R1, R2 and R3, as the scheme has been designed so that the layout creates a positive interface with the surrounding area, with the adoption of a perimeter block arrangement with buildings proposed to front onto the street and to overlook the river to the south.
- 12.21 Site and Policies Plan 2014 Policy DM D2 outlines that proposals will be expected to: “relate appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area; and provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles.”
- 12.22 The layout of the proposed development comprises of five flatted blocks (D, F, M, N & Q) on the key corners of Morden Road and the primary route through the site, Ravensbury Grove, which comprise of four storeys high. The proposal would also provide terraced residential dwellings comprising of two and three storeys high. The proposed Houses will create traditional streets within the central core of the site, which would relate to the neighbouring retained homes.
- 12.23 Having regard to flood risk, the sequential approach to site layout has been adopted with the proposed buildings generally located in areas of the least flood risk. Flow routes have been taken into account in developing this site layout. The overall design approach and layout is considered to enhance the

character of the area in accordance with planning policy requirements by creating clearly defined streets and spaces.

- 12.24 The layout of the site has been designed to be accessible and easy to navigate for all new residents and the general public, with legible routes through the site, visible entrances to buildings and clear distinctions between public and private spaces. The landscaping proposals would enable easy access to all parts of the site.
- 12.25 The proposed layout is supported and provides good connectivity through the development by way of a central pedestrian route between all flatted blocks and the residential dwellings, allowing adequate access to the public footpath and 'River Wandle'. Distances between the blocks and dwellings also allow good visual permeability at all frontages, particularly when viewed from distance, in particular the north to south link that connects Ravensbury Grove to the River Wandle. Policy EP R2 (B) States that Ravensbury Grove must be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park. The proposal is therefore compliant of this policy requirement, which also includes a layout of new networks that provide appropriate connection and overall permeability throughout the site ensuring adequate movement throughout the site.
- 12.26 Overall, the proposed layout has been carefully designed to accord with the Estates Local Plan Adoption 2018 and policies within the Local Plan. The footprint of the proposed buildings respond appropriately to the site constraints and surrounding area, whilst the open space along Ravensbury Grove including landscaped area to the south and south-east of the site creates a highly accessible and connected layout.

12.27 **Scale**

- 12.28 London Plan Policy 7.7 states that buildings with large footprints should relate well to the form, proportion, composition, scale, and character of surrounding buildings, urban grain, and public realm. The policy seeks to ensure that buildings of large nature contribute to improving the permeability of the site and wider area. Furthermore, Policy 7.7 states that large buildings should not affect the environment of their surroundings adversely, including in terms of overshadowing.
- 12.29 Policy 7.4 (Local Character) requires development to provide a high quality design response having regard to the pattern and grain of existing spaces and streets; the urban structure and the surrounding historic environment. In relation to heritage assets, Policy 7.8 (Heritage Assets and Archaeology) outlines that where development affects a heritage asset and its setting, it should conserve that asset's significance by being sympathetic in terms of form, scale and materials.
- 12.30 Policy 7.6 (Architecture) states that new development should be of the highest architectural quality, whilst also being of an appropriate proportion and scale so as not to cause unacceptable harm to the amenity of surrounding land and buildings, especially where these are in residential use. The policy requires development to optimise the potential of sites.
- 12.31 Core Planning Strategy Policy 14 requires development proposals to sensitively address the issues of height and scale through a detailed analysis of

the impact on local context. Furthermore, Policy DMD2 states that development proposals should respond to their context, specifically in terms of scale, height and massing. Core Planning Strategy Policy 14 also sets out that larger and medium rise buildings are appropriate within the key growth locations and where regeneration initiatives are thought. Proposals should consider local context to ensure building heights and scale are in keeping with surrounding neighbouring properties.

- 12.32 Policy DMD2 further states that proposals for all development will be expected to: “relate appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area; and...provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles.”
- 12.33 Merton’s Estate Local Plan Policy EP R8 recognises the need to set appropriate heights and scales of buildings particularly in the interest of safeguarding existing open views to the surrounding trees and parkland setting. This policy therefore seeks to ensure that building heights do not extend higher than the existing Ravensbury Court flats which comprise of 4 storey purpose built flatted blocks. The policy also states that any proposed building on this estate does not extend or compete with established mature trees which envelope the estate. The main objective of this policy is to ensure that the scale, height and massing of proposed buildings provide a positive contribution to the existing townscape, character and local distinctiveness of the area.
- 12.34 Policy EP R8 further states that buildings around the edge of the estate fronting Morden Road along Ravensbury Grove and on Ravensbury Garages should be higher than the middle of the estate. Building heights within the middle of the estate must generally be lower than around the edges.
- 12.35 It is noted that all existing buildings on Ravensbury estate are two-storeys with the exception of the one larger four-storey block, Ravensbury Court. Whilst the low-rise buildings define the estate as a suburban place and provide ideal views to the tree-line visible around the estate from numerous locations, it is considered however that there is more scope to sensitively increase heights to create more homes, so long as existing views to the trees are not obstructed and the landscape character of the overall estate remains visibly strong.
- 12.36 The proposed buildings vary in height from 2 to 4 storeys. The four storey buildings are focussed towards the corners of the site adjacent to Ravensbury Park and opposite the Surrey Arms Public House, and along Ravensbury Grove, the three storey buildings are focussed along edges of the site on Morden Road and the two storey dwellings are situated towards the centre of the site. Proposed heights respond to the context of the site and the existing buildings on the Estate which are also between 2 and 4 storeys.
- 12.37 Furthermore, the proposed developments are considered acceptable as per the definition within the London Plan Policy 7.7 which seeks to ensure that buildings of large nature contribute to improving the permeability of the site and wider area, as well not to cause an adverse impact on the environment or their

surroundings. The proposals have been fully assessed against these criteria and the requirements of other local planning policy.

- 12.38 The proposals seek to respect the form, scale and grain of the surrounding area, and would make a positive contribution to the character of the area and wider townscape. As such given the modest scale and massing of the proposed development in context with surrounding buildings the proposal is therefore considered acceptable and would accord with the proposed building heights strategy outlined within ELP Policy R8, and townscape policy ELP Policy EP R1 and also in accordance with SPP Policy DM D2.
- 12.39 The proposals have been designed to ensure a coherent pattern of development across the site to provide a high quality 'gateway' between Morden and Mitcham, whilst also providing a high quality connection between 'Ravensbury Park' (south-east) and the National Trust Park 'Morden Hall Park' (north-west). The application site would also provide positive contribution to the area and create visually appealing approach when arriving from A239 'Morden Road' located on the northern/western boundary and Wandle Road on the southern boundary of the site.
- 12.40 The modest height increase in order to address the flood risk concern is considered to be acceptable and would not compromise the character and appearance of the proposed development. The height parameter would be the maximum which the development could be built to and this would be set as part of the approved scheme. The maximum parameter of the development would ensure the maximum ridge height of the flatted blocks would be marginally higher than the existing Ravensbury Court situated on the eastern side of Ravensbury Grove, which comprises of 4 storey building. Furthermore it should be noted that the proposed fourth storey of the flatted blocks would be set back from the buildings facing elevation in order to ensure subservience and modesty on the visual amenities of the street scene. The building heights of the flatted blocks (4 storeys) would also be subservient to the surrounding trees which has been the main design focal points of the proposed scheme.
- 12.41 The proposed design of the buildings would be exemplary in terms of scale and massing, providing a high quality development within Morden/Mitcham. The overall scale, form and positioning of the development reinforces the acceptability of the scheme and would ensure no harm is caused to the character and appearance of surrounding land and buildings and amenities of wider neighbouring properties in terms of over-massing and overbearing impacts.

Design Review Panel

- 12.42 Overall the proposed scale, massing and design of the proposed development had been fully supported by the Council's Urban Design team. The proposal was also presented to the 'Design Review Panel' on September 2016. A summary of the review revealed that Ravensbury estate masterplan regeneration scheme performed rather well against the 'Build For Life' 12 questions, which offers a tool kit aimed at assessing residential quality for new developments. The assessment is based on a simple 'traffic light' system (red, amber and green) which is recommended that new proposed developments should aim to secure as many 'greens' as possible.

12.43 The proposed masterplan scheme was awarded eight 'greens' which reflects the benefits of its location as well as the design solutions used on the estate. In the area's where 'amber' scores were awarded, this related to issues such as; proximity to local amenities for future residents, landscape, car parking and refuse/recycling facilities, these were regarded as areas which could be further improved. The design panel review had no objections on the proposal in terms of; scale, massing and design which was considered acceptable overall.

13.0 Reserved Matters (Appearance and Landscaping)

13.1 Appearance

13.2 Consideration will be given at the detailed stage (known as Reserved Matters) to ensure a high quality of architecture and materials including building form and design are applied. The assessment under appearance in the Reserved Matters will also consider the need to minimise single aspect residential units, well-designed and usable private and communal amenity spaces and an integrated approach to car parking and the public realm. It is anticipated that the Reserved Matters applications will be subject to detailed assessment review by the Council's established Design Review Panel and the Design Council.

13.3 The application is supported by a Design and Access Statement, which sets out a well-considered analysis of the urban design issues relevant to the existing site and its surroundings and which then, informs the urban design rationale for the proposed redevelopment. It explains the key urban design principles which have informed the proposed development and includes the objectives of achieving the highest standards of architecture and urban design through a Design Code. As mentioned, the applicant has submitted a Design Code document, which provides overarching guidance for future design teams that would be involved at Reserved Matters stage. It establishes design principles and provides a general indication of the proposed development.

13.4 The Design Code sets key principles and design parameters that inform and control the design for future reference in the Reserved Matters applications and detailed design of future phases, these include; landscape and public realm, built form, architectural quality and materials and building typologies. The establishment of principles within the Design Code will be a useful tool at Reserved Matters stage should this outline scheme be delivered.

13.5 Landscaping

13.6 The landscaping strategy through the site is sound, which includes green buffers along Ravensbury Grove and also the southern part of the site. All the houses and mews would have provision to private amenity space and the flatted blocks would have access to semi-private amenity space.

13.7 To conclude, the Design Code also provides further information on the coding to be applied at the Reserved Matters stage in preparing the landscaping design in line with ELP policies to assist in delivering the vision for creating a suburban parkland setting.

14.0 **Parking and Transport**

14.1 The outline status of this planning application does not seek PAC's decision on specific scheme details such as parking locations and their interaction with the street scene including the appearance and landscaping details. As the overall scheme would progress on a phased basis, these important aspects of detail would be appraised within future Reserved Matters applications. This means that at this outline stage, only Access, Layout and Scale is for consideration, however, all other planning matters are assessed to establish the feasibility that this scheme can be delivered in its entirety.

14.2 **Car Parking**

14.3 The initial TfL review of the proposed Transport Assessment for Ravensbury Estate Regeneration the proposal had included the indicative provision of 176 car parking spaces, which equates to a car parking ratio of 1 space per 0.97 units.

14.4 It is noted that the Draft London Plan 2017 parking standards, state that for outer London sites with a PTAL 2, the maximum standard is up to 1 space per unit. However, given the site's proximity to the tram and bus services, TfL would recommend that the car parking provision is reduced. Following minor amendments to road layouts in accordance with LBM Transport & Highway Officers comments the proposal has reduced the number of parking to 167 car parking spaces, which would be considered acceptable.

14.5 The on-street parking spaces are intended for shared purposes by residents of the flatted blocks and no individual car parking spaces would be allocated to the residents in these apartments.

14.6 Policy OEP 3 (Urban Design Principles) (xii) titled 'Parking Provision' states that vehicular parking that is provided on-street as a first choice should be well managed and integrated into the rest of the street.

14.7 The proposal has applied these principles within the site; the on-street parking provision has taken into consideration suitable siting and designation for vehicle parking, with a coherent layout along the street networks. The overall road hierarchy suitably accommodates facility for the following; footpath (2 metres), parallel parked cars (2 metres) and carriageway width (5 metres), with a total comprising of 13 metres street width.

14.8 The Council will seek a full parking management plan to be implemented in order to manage parking within the communal areas, with parking allocation and management to be decided within this plan at a later stage. This is to be provided in accordance with Policy OEP 3 (Urban Design Principles) (xii) 'Parking Provision'.

14.9 Furthermore as part of the parking strategy, the applicant will investigate controlled parking zones covering the estate could be implemented to ensure adequate management of parking is maintained on site.

14.10 The TA states that the proposal for provision of disabled car parking will accord with London Plan standards, this will equate to 18 disabled car parking spaces. The provision of disabled car parking spaces would be planned in accordance with GLA Best Practice Guidance on Wheelchair Accessible Housing, which states that 10% of parking for new housing should be designed

to be wheelchair accessible or easily adaptable for residents who are wheelchair users'. Furthermore this would be secured by way of condition.

14.11 The submitted detailed plans at Reserved Matters stage would need to demonstrate a minimum dimension of 2.4m x 4.8m for general car parking space and 3.8m x 6m for disabled parking spaces with an additional 1.2m to the side and (where possible), also 1.2m to the rear as transfer strips of disabled access.

14.12 Electric Vehicle Charging Points (EVCPs) shall be provided in accordance with the London Plan (2016) standards with 20% active and 20% passive provision or the standards in place at the time of Reserved Matters applications. The TA states that the proposed provision of Electric Vehicle Charging Points (EVCP5) would accord with London Plan 2016 standards: 35 active EVCP and a further 35 passive provision. These would be secured by way planning condition. Furthermore it is worth noting that all the houses with on-plot parking will be provided with external power points for charging, which would be further dealt with at the reserved matters stage.

14.13 Cycle Parking

14.14 All cycle parking would be secured as a condition to the outline planning permission that would result in separate and secure storage for the proposed flats. The indicative layouts proposes potential locations for the cycle and refuse stores. The total number would accord with the minimum cycle parking requirements set in the London Plan (2016) or the requirements of the Statutory Development Plan in place at the time of the Reserved Matters planning applications. This will be secured by condition.

14.15 Transport Improvements

14.16 As part of the proposal, a series of works are to be secured as part of a s278 Agreement as well as financial contributions that would be secured as part of the s106 Agreement to the outline planning permission. Officers have yet to confirm the sum for works associated with s278 works given that the level of details showing highway works has yet to be fully worked up and will require further detailed drawings at Reserved Matters stage to enable a calculated cost attributed to the s278 works.

14.17 As part of the S278 agreement and prior to the first occupation of each "relevant work phase" either complete the highway works as set out below at the developers own cost; or pay to the Council a specified contribution to be calculated by the Council such highway works which may include but not be limited to:

- Renewal/addition of any footpath or carriageway;
- Removal/addition of any crossover;
- Reinstatement/Provision of any dropped kerbs;
- Removal/addition of single/double yellow lines and other road markings and signs and related traffic management orders;
- Extension of existing controlled parking bays;
- Carriageway resurfacing to the site entrances;
- Revisions to street lighting;
- Relocation of any services if and where necessary;

- Drainage; and
- Repair of damage caused to the highway as a result of any works related to the development.

14.18 The developer must also agree to pay the sum for the S278 Highway works which may include the introduction of traffic calming to keep vehicle speeds low along the junction of Morden Road and Ravensbury Grove. Other potential public highway works which may comprise of bus relocations will also be considered at reserved matters stage upon further consultation with Transport for London and LBM Transport & Highway Officers at the developers own cost.

14.19 In order to cater for any anticipated burden on local services the Council, in tandem with Transport for London, will require contributions towards the improvements of local bus services in the area as part of any s106 Agreement. During pre-application discussion TfL requested the applicant investigate improving the location of the bus stops on Woodstock Way in consultation with TfL Buses. It was noted that there had been no reference to this in the Transport Assessment that was submitted along with this Outline Application. The details of this assessment would be imposed by way of condition as part of the Transport Assessment at Reserved Matters stage and any necessary improvements would be funded by the applicant by way of S106.

14.20 Detailed Travel Plans for each phase of the development would be required to be submitted post-outline permission and secured under any s106 Agreement to ensure sustainable modes of transport are encouraged and less dependency on the car.

14.21 The layout and completion of all internal estate roads must be designed and built to meet or exceed the Council's adoptable standards. It should also be noted that the roads currently being proposed for adoption are not being assessed in this current outline planning application, which will require further assessment and consultation with Officers.

14.22 Furthermore **Condition 8** would require the applicants to provide an Urban Design Report, which explains the approach to the design and how it takes into account the Design Code, which will inform the design proposal for matters relating to; scale, layout, access, appearance and landscaping.

15.0 Provisions of residential and community use;

15.1 Residential

15.2 Whilst the proposal outlines what could be achieved on-site in terms of the maximum number of residential units, a planning condition sets out ranges for the mix of dwellings to ensure a broadly policy compliant mix is ensured as set out in Policy DM H2 of the Local Plan Policies 2014 and Policy CS 8 of the Core Planning Strategy 2011. The actual mix provided on site will be determined through the Reserved Matters at each phase. It is expected that

the applicant at Reserved Matters stage would seek to achieve the residential mix set in Policy DM H2 of the Local Plan Policies 2014 or to an agreed mix with the Local Planning Authority.

15.3 Community use

- 15.4 London Plan Policy 3.1(B) states *“Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Proposals involving loss of these facilities without adequate justification or provision for replacement should be resisted.”*
- 15.5 London Plan Policy 3.16 (B) also states that *“Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted.”* The Merton Core Strategy Policy CS11 and Sites and Policies Plan Policy DMC1 both aim to resist the net loss of community facilities.
- 15.6 The proposal meets Policy EPR4(a) of the Estates Local Plan (Main Modifications) 2017 through the proposed retention of the existing community room: *“The predominant land use for this estate is to be retained as residential with the re-provision of the existing number of affordable homes and the existing community room.”*
- 15.7 The proposal indicates that the existing community room will be demolished (84.5sqm) and replaced with a new D1 community space (of up to 160sqm) accessible by all residents, therefore there will be no net loss of community facilities.
- 15.8 The new community facility is proposed to be constructed during Phase 3 before the proposed demolition of the existing community facility, which is also proposed during Phase 3. This is supported so that residents will have access to and use of the community facility during all stages of the construction period.
- 15.9 The re-provision of the community facility will be required during the construction stage in the form of temporary provision whilst works are being undertaken at phase 3 stage, this requirement will be secured by way of s106 to the satisfaction of the LPA. **Condition 6** has been imposed relating to the non-residential element of the scheme.

16.0 Residential Amenity

- 16.1 The applicant would be required to fully demonstrate with detailed drawings at Reserved Matters stage that the daylight and sunlight test results would show that the habitable rooms of the surrounding properties will receive good levels of daylight and sunlight in accordance with the Building Research Establishment (BRE) guidelines with the proposed development in place. It would include carrying out tests for daylight to windows comprising the Vertical Sky Component (VSC), daylight distribution, Average Daylight Factor (ADF) and the depth of the room. Sunlight to windows would also be

considered by carrying out an assessment of Annual Probable Sunlight Hours (APSH) and overshadowing to gardens and open spaces.

- 16.2 A Daylight and Sunlight analysis has been carried out. The main scope of this study is to assess the reasonableness of the retained values of the existing surrounding properties in terms of daylight and sunlight. The assessment has been undertaken on the basis of the maximum quantum of development (in terms of residential units, non-residential floor space, and maximum parameters which provide the maximum layout and scale of the proposal). The massing of both the Phase 1 buildings and the rest of the masterplan has been included to assess whether the Outline Development made an impact on the Phase 1 buildings. To ensure that this assessment can be appropriately evaluated, the analysis has been carried out in accordance with the following guidance documents: - Building Research Establishment (BRE) Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice (2011) - British Standard BS8206-2:2008 Lighting for buildings-Part 2: Code of Practice for Daylighting.
- 16.3 The 25 degree line test demonstrated that the proposed development falls under the angular plane for all the existing buildings. The BRE guide states that when this is demonstrated, no further analyses are considered to be necessary. There was a desire to understand what daylight and sunlight levels will be enjoyed by the retained buildings with the proposed development in place, and so an analysis was undertaken in the proposed scenario. A daylight and sunlight facade study was carried out to assess the effect of the new buildings on the residential properties located immediately adjacent to them. For sunlight, in accordance with the BRE Guide, only windows facing 90 degrees of due south need to be assessed. The daylight assessment demonstrates that the surrounding buildings and occupants will keep enjoying good levels of daylight in their main living rooms as reasonable daylighting levels are expected to be achieved with the proposed buildings in place. Likewise, residents living close to the proposed development will keep enjoying direct sunlight in their main living rooms throughout the year. An overshadowing analysis was undertaken considering also the effect which the trees will have on the buildings. The results of this analysis show that the existing amenity spaces will achieve reasonable sunlight levels with the proposed buildings in place.
- 16.4 In order to maintain good levels of daylight the BRE guidance recommend that the Vertical Sky Component (VSC) of a window should be 27% or greater. The surrounding properties will not be adversely affected by the proposed development as the daylight levels on their facades are all within acceptable levels (i.e. VSC above 27%). A study of the daylight, sunlight and overshadowing reveals that surfaces show a white colour which indicate areas that have a VSC of over 27%, which meets the recommended performance. Other colours, from yellow to orange, pink and purple indicate areas with a VSC of less than 27%. The results of the analysis show that the retained values in the proposed condition are all within reasonable levels.

- 16.5 Furthermore the minimum distances within the site between buildings will provide acceptable amenity levels. Referring to the relationship with the nearest existing residential occupiers on the eastern and south-eastern side of the site, the proposed residential Blocks M & Q at a maximum of four storeys would be sited away from the boundaries of the nearest residential properties along eastern side of Ravensbury Grove by at least 30m-35m. The proposed residential Block F at a maximum of four storeys would be sited away from the boundaries of the nearest residential properties along south-eastern side of Ravensbury Grove by at least 20m.
- 16.6 The orientation and distance between these adjacent buildings would not be back-to-back or directly facing and therefore, would not result in any adverse impact on these existing occupiers. Other neighbouring residential occupiers are more distant. It is therefore considered that, subject to detailed consideration of the design of the dwellings, the proposed development would not be overbearing to the occupiers of neighbouring dwellings adjacent to the site, nor would the buildings result in unacceptable loss of light or outlook. Accordingly, the proposed development would not unduly impact on the amenities of the occupiers of any existing neighbouring residential properties in the vicinity due to separation distances. The proposal would therefore ensure that an acceptable impact on the amenities of neighbouring residential occupiers would be provided, in accordance with the requirements of Policy DM D2 of the LB Merton Local Plan 2014.

17.0 Standard of Accommodation and Future Occupiers

- 17.1 Regarding internal floor areas, all of the residential properties would need to meet the minimum space standards for new residential development, in accordance with the Mayor of London's Housing SPG (2016).
- 17.2 As the proposal is submitted in outline form, no detailed internal layout plans of the proposed residential buildings have been submitted. There are however illustrative plans and parameters in relation to housing layout and typologies, which provide an indication of how the site could be developed. On the basis of the information provided including Parameter Plans, officers are satisfied that the proposed houses and flats could be designed to accord with space standards set in the London Plan (2016) and the Department for Communities and Local Government Technical Housing Standards (2015).
- 17.3 There would also be a good level of communal amenity space provided and subject to further consideration of this issue at Reserved Matters stage, the proposal is considered to be acceptable in this regard.

Density

- 17.4 The regeneration proposals seek to optimise the housing potential of the site and ensure that this large brownfield site is used effectively. The site has a PTAL rating of 2 and the draft ELP suggests that the site falls within a suburban setting; therefore, the indicative density range guidance is 45 – 70 uph. The housing density for the outline planning application at Ravensbury is

56 units per hectare, based on a site area of 3.21 hectares and up to 180 units proposed.

- 17.5 May also want to add as it reveals the proposed scheme incl phase 1 would still fall comfortably within the density matrix.
- 17.6 Including the first phase which has been granted planning permission separately, the density is 57 dwellings per hectare based on an area of 3.52 hectares, 21 homes in the first phase and up to 180 units proposed (total of 201 units).
- 17.7 The proposed density falls comfortably within the density guidance range provided in the LP for urban and suburban sites. It is considered that the proposals optimise the potential of the site having regard to the character of the area and site context. The density is the outcome of the design-led approach adopted in developing the masterplan and is therefore acceptable.

18.0 Nature Conservation

- 18.1 Policy CS 13 Open space, nature conservation, leisure and culture expects developments to incorporate and maintain appropriate elements of open space, play areas and landscape features such as trees which makes a positive contribution to the wider network of open spaces. In addition the developments also need to improve access to open space and nature conservation by public transport, cycle, mobility vehicles and on foot and protect and enhance the borough's public and private open space network including Metropolitan Open Land, parks, and other open spaces. The policy also encourages the use of land for growing food.
- 18.2 In terms of Nature Conservation the above policy seeks to protect and enhance biodiversity through supporting the objectives of the London Biodiversity Action Plans and encourage new green links, green corridors and islands to seek in reducing areas of deficiency in nature conservation and to create safe species movement and havens for nature. The policy also requires protecting street trees and using Tree Preservation Orders to safeguard significant trees and improve public access to and enhance our waterways for leisure and recreational use while protecting its biodiversity value. The policy requires, where appropriate, the developments to integrate new or enhanced habitat or design and landscaping which encourages biodiversity and where possible avoid causing ecological damage. Full mitigation and compensation measures must be proposed for any ecological damage that is caused.

19.0 Heritage

- 1.1. A 'Heritage Assessment' was carried out by Cotswold Archaeology Consultancy in support of the outline planning application.

- 1.2. Morden Hall Park, separated from the site by Morden Road / Morden Hall Road, is registered under the Historic Buildings and Ancient Monuments Act 1953 within the register of Historic Parks and Gardens as Grade II listed <https://historicengland.org.uk/listing/the-list/list-entry/1001336>
- 1.3. Wandle Valley Conservation Area covers Morden Hall Park and Ravensbury Park (on either side of the site) and adjoin the Wandle Valley Conservation Area. Wandle Valley Conservation Area – Lower Mitcham: Watermeads and Station are also situated within a 500m radius of the Site.
- 1.4. The buildings in the area date from around the 15th century onwards, the earliest buildings mainly being mills and their associated buildings. The height of the buildings is generally two storeys, with the bigger villas having three.
- 1.5. The main significant buildings within the sub area include the listed buildings around Mitcham Station, Wandle House, the Grove Mill and the mill workers' cottages. The most common materials are yellow and brown stock brick laid in Flemish bond. The area is mainly urban in character, although the parkland areas are well wooded and the section around the river is a nature reserve, which gives these areas a more open character.

1.6. Setting of a listed building – statutory listing

- 1.7. The following buildings are listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.
- 1.8. These heritage assets comprise the Grade II Listed Ravensbury Mill, Grade II Listed White Cottage and Grade II Listed Morden Lodge, in addition to the Grade II Registered Park and Garden at Morden Hall and associated Listed Buildings. The Wandle Valley Conservation Area sub-area 5 (the Parks, containing Ravensbury Park and Morden Park; has also been considered as part of the detailed settings assessment.

1.9. Grade II Listed White Cottage (NHL 1080910)

1.10. Step 1: The heritage asset and its setting.

- 1.11. The Grade II Listed White Cottage comprises a detached structure, dating to the 18th century. The building has three storeys, with bay windows on its south-west facing façade overlooking the A239 (Morden Road). The structure is timber clad, with brickwork visible in areas.
- 1.12. The Listed Building lies within a small garden area, surrounded by fencing. A public house (which is not designated or included on the Local List; Merton Borough Council) lies immediately to the west, a small number of structures also lie to the north-west, and the building fronts onto the main road (the A239- Morden Road), and faces the housing estate which currently occupies

the Site. To the north and north-east lies the Grade II Registered Morden Park.

1.13. Step 2: The contribution of setting to the significance of the historic asset.

1.14. The significance of the Listed Building derives primarily from the historic and architectural interest retained by the asset's physical fabric. The evidential and historical values of White Cottage are embodied within the fabric of this building, representing an example of a post-medieval vernacular dwelling. Ravensbury, Borough of Merton: Heritage Desk-Based Assessment

1.15. The key setting of the Listed Building comprises the garden area in which it lies and adjacent structures. White Cottage is stated within the Listed description to date to the 18th century, and thus historic maps which depict the area from this period give an indication as to the original setting of the asset. Historic maps, including Rocque's Map of 1768 and the Tithe map of 1847, show that in the past the Grade II Listed Building has lain within a small group of structures situated on the bend of the A239 as it does today.

1.16. Rocque's map shows that beyond the adjacent buildings and enclosure in which these and the Listed Building lay, were fields to the north, and north east the River Wandle to the west, and fields within the Site area which lay, as it does today, beyond the bend in the main road. The main road forms part of the setting of the Listed Building.

1.17. During the 18th century this part of the River Wandle was associated with market gardening. Medicinal and aromatic herbs, watercress and other species were grown in this area. The area was also important at this time for calico bleaching, printing, flour and snuff milling, the manufacture of flock, felt and paper, copper and leather working. Buildings shown within the Site, and possibly to the south, in addition to the Snuff Mill recorded at Ravensbury Mill on Rocque's map of 1768 are likely to have been associated with these processes. The modern houses which lie within the Site make no contribution to the setting of the Grade II Listed Building, and can be clearly seen from the Listed Building. However, they are a representation of the historical processes that have dominated this area, with the development and closure of the industrial activity followed by two phases of residential development.

1.18. Step 3: The effect of the proposed development on the significance of the asset.

1.19. The proposed development would comprise the demolition of the current houses, and the construction of modern housing, including a four-storey block of flats at the corner of the site (opposite the cottage), with three storey pitched-roof houses fronting onto Morden Road to the east and south.

1.20. The proposed development would not affect the key contributors to the significance of the Listed Building, embedded in its physical fabric and architectural form. The key elements of the setting that make a contribution to

the significance of this asset, including its garden, its roadside location and historical associations with the history of the development of the River Wandle environs would not be affected. The development would comprise the replacement of the existing housing estate within the Site within modern, higher quality houses. Such development would not constitute a change to the character of the surroundings of this Listed Building. The proposed development has been designed to respond to the local patterns of development and to the industrial history of the area, with the form of new buildings (i.e. pitched roofs to town houses) and traditional material (including brick) complementary to local architectural traditions. Such design principles could create surroundings that would be more harmonious with the Listed Building than the present, worn and aesthetically displeasing estate. As specified in the Townscape and Visual Impact Assessment, the massing and detailing proposed (as defined in the Design and Access Statement and the Design Code produced by HTA) will ensure that the quality of the Proposed Masterplan will be a great improvement to the urban design and architectural conditions that currently exist on the Site, particularly along the edges of the estate and nearest to the White Cottage and Ravensbury Mill Listed Buildings.

- 1.21. However, it is noted that the proposed building immediately opposite the Listed Building is of greater scale than the extant houses (three storeys with set-back fourth instead of two storeys with pitched roof). Whilst such introduction into the setting of the Listed Building could be detrimental, it would fall within the lower end of the scale of less than substantial harm, as defined by the Framework - it would not affect the key contributors to the asset's significance. As such, any change to the significance of this Listed Building needs to be considered in the context of the existing estate, which is worn, unsightly and makes no positive contribution to the significance of this asset. The new buildings, albeit taller, which could be perceived to be dominant, would form part of a considerate development creating quality public realm along Morden Road and replacing an unattractive estate. In this context, any limited harm upon the significance of the White Cottage by taller buildings needs to be weighed against the benefits of the proposal and the proposed improved character of a well-designed residential street, which has the potential to enhance the character of the Listed Building's setting. On balance, it is Ravensbury, Borough of Merton: Heritage Desk-Based Assessment considered that the proposal would have a neutral effect on the significance of White Cottage.

1.22. Grade II Listed Ravensbury Mill (NHL 1080857)

1.23. Step 1: The heritage asset and its setting.

- 1.24. The Grade II Listed Ravensbury Mill comprises a watermill, recorded within the Listing description to comprise a factory structure, dating to the mid to late 18th century. The building is made of stock brick with a hipped slate roof and red brick arches over cast iron casements in places. Water wheels are also retained within the Listed Building. The Mill is situated close to the River Wandle, associated with a range of conjoined buildings which line Morden Road. Large residential structures, such as Riverside House, lie to the south

and east of the Listed Building, and have elements within their design which reflect the character of the mill.

1.25. Step 2: The contribution of setting to the significance of the historic asset.

1.26. The key setting of the Listed Building comprises the River Wandle. In functional terms the Grade II Listed Building's existence and location relates to this river, and in terms of its wider context the River formed the focus for industrial activities from the post-medieval period, of which Ravensbury Mill survives as a standing reminder.

1.27. Rocque's map of 1768 shows a line of buildings within and adjacent to the Site, and the tithe map records a printing factory in this area, and the snuff mills at Ravensbury Mill. During the 18th century, the area was also important for calico bleaching, printing, flour and snuff milling, the manufacture of flock, felt and paper, copper and leather working.

1.28. The modern buildings which surround the mill in their form and materials reflect the character of the Grade II Listed Building, and make a positive contribution to its setting, emphasising its presence and history. The houses which lie within the Site make no contribution to the setting of the Grade II Listed Building. However, they are a representation of the historical processes that have dominated this area with the development and closure of the industrial activity followed by two phases of residential development.

1.29. Step 3: The effect of the proposed development on the significance of the asset.

1.30. The proposed development would comprise the demolition of houses, and the construction of modern housing, with illustration of the new development provided on Viewpoint 1 of the Visual Impact Study (by Miller Hare Limited). As with the Grade II Listed White Cottage the replacement of this housing with modern, higher quality units would enhance the area and could, through use of appropriate materials, be constructed in a way which would be more harmonious with the Listed Building than the current housing. Materials concordant with the mill (including durable and high quality facing materials, including brick, and metalwork that is colour-coordinated) may enhance the setting of the Grade II Listed mill through emphasising elements of its historic setting. The use of such materials in the area most closely adjacent to the mill and River Wandle would serve to enhance the setting of the mill by the formation of structures in line with the post-medieval industrial character of this area. Given the nature of the Site and the location of the Listed Building it is apparent that the most sensitive areas of the new development will be those in the adjacent south west corner of the Site and along the Wandle Valley. The Wandle Valley includes a large number of shrubs and trees, many of a mature age. These limit views along the river and serve to hide part of the proposal Site from Ravensbury Mill. It is therefore concluded that there would

be no harm to this heritage asset, in line with the National Planning Policy Framework.

1.31. Wandle Valley Conservation Area, Grade II Registered Park and Garden at Morden Hall and associated Listed Buildings

1.32. Step 1: The heritage asset and its setting.

1.33. Wandle Valley Conservation Area was designated in 1990 and extended in 2000. Draft character assessments for the Wandle Valley Conservation Area are being prepared by Merton Borough Council and are available in draft format from the council website. The Conservation Area has been divided into a series of sub-areas, for which separate character assessment documents have been produced.

1.34. The Site lies beyond, but is surrounded on three sides by the Parks sub-area of the Wandle Valley Conservation Area. 'The Parks' area covers Morden Hall and Ravensbury Park, and as such the Grade II Registered Park and Garden at Morden Hall, the 8 Grade II Listed Buildings and a number of Locally Listed Buildings within it have been considered here, in tandem with the Wandle Valley Conservation Area. However, it must be noted that different policies cover these heritage assets.

1.35. The Planning (Listed Buildings and Conservation Areas) Act of 1990 provides protection for the Conservation Area and Listed Buildings, while Registered Parks and Gardens are designated by English Heritage who use powers set out in the 1983 National Heritage Act. The Framework sets out national planning policy relating to the conservation and enhancement of the historic environment. Conservation Area. This sub-area of the Conservation Area is characterised by parkland representing the remains of estates arranged along the River Wandle, which include Morden Hall, Ravensbury Park and the former Mitcham Grove (Watermeads Housing Estate). Additionally, three water mills also lie within this sub are (Ravensbury Mill and two mills within Morden Hall Park). The mills form a physical representation of the milling and industrial activities which took place along the river and formed an important aspect of the history of the Conservation Area.

1.36. Ravensbury Park, which characterises the south-eastern part of this sub-area of the Conservation Area, is associated the former Ravensbury House. Ravensbury House is shown on historic maps, just to the north of the River Wandle, and adjacent to the southern Site boundary. Remains recorded within this area relate to the 18th-century Manor House. Excavations conducted in 1973 recorded evidence of an 18th-century yard and outbuildings in the direct vicinity of the manor house. Earlier industrial remains were also found, and medieval pottery was recovered from subsoil deposit. It has been suggested that the 18th century manor house lay on the Site of an earlier, medieval, house of which documentary evidence dating from the 16th century is known (Montague 1977: 286). The house is thought to have formed the focus for calico bleaching and printing (ibid), and a printing factory I recorded adjacent to the manor house and shrubberies on the 1847 Tithe map.

- 1.37. By the latter part of the 19th century, Ravensbury Manor House had fallen into disuse, and the surrounding parkland, characterised by mixed conifer and broadleaf plantation, had developed. During the 20th century areas of the parkland were developed for residential purposes, and the remaining area was allocated as public parkland in 1930. Additions and alterations have been made in the subsequent period, including the excavation of a lake in the eastern part of the park in 1970, for drainage, and the extension of the riverside walk. Modifications to the river's course adjacent to Ravensbury Mill have also been made.
- 1.38. Ravensbury Mill also lies within the Conservation Area, and is discussed separately, in detail above. Mitcham Grove comprises the remains of a post-medieval estate focused around an Elizabethan Manor. Excavations have shown that there was an earlier, 12th-13th century house on this Site, which may have been the precursor to the 18th/19th century house. The grounds of Mitcham Grove were incorporated within Ravensbury Park and the public park formed in 1930.
- 1.39. Morden Hall Grade II Registered Park and Garden is focused around Morden Hall. Morden Hall is itself a Grade II Listed Building lying around 610m to the north-west of the Site. The land on which Morden Hall was founded belonged to Westminster Abbey prior to the dissolution, at which point it was purchased by Messrs Duckett and Whitchurch. In 1554 Richard Garth purchased the lands, which included a new mansion house at that date, located southward of the current Morden Hall. The present Grade II Listed Building was built in 1750-1765 (although the Conservation Area Appraisal notes a date of 1770 shows a series of enclosures within the area of the current parkland which may represent formal gardens associated with the hall. The kitchen gardens are thought to be contemporary with the hall, dating to the 18th century. In the period following the construction of the hall the associated kitchen gardens were let to a series of nursery men and were used as market gardens for the majority of the 19th century, and the hall was occupied by tenants including Rev. J and T. White who used it as a school. The kitchen gardens, which in the past were used as a nursery, now comprise a garden centre. During the 19th century the parkland was used as a deer park by the then owner Gilliatt Hatfield (who began buying up parts of the estate in 1867), during which period many of the buildings were altered to suit this purposes.
- 1.40. During the creation of the parkland in 1873 Gilliat removed boundaries and knocked down cottages. He also established tree-lined boundaries along the east and west park edges. English Heritage cite the main features of the 1873 parkland as comprising the 'tree-lined drive from the Hall to the new South Lodge in Morden Road'. This single storey Lodge, a Locally Listed Building, is characterised by the stonework details on the chimney, round headed windows in the east elevation and timber bargeboards (Merton Borough Council 2009). The previous main entrance lead to the hall from Morden Road, from the west, and can be seen on Rocque's map. This entrance leads to a turning circle in front of the hall.

- 1.41. A small number of changes to existing watercourses and the construction of a series of bridges crossing the Wandle were also made by Hatfield. The Hall gardens also saw minor alterations and new structure including lodges and a stable block were built.
- 1.42. Step 2: The contribution of setting to the significance of the heritage asset.**
- 1.43. A number of important strands which tie the historical background, context, wider setting and character of the parkland, Conservation Area and associated Listed Buildings and Locally Listed Buildings can be drawn out. The elements which form the key aspects of setting include: the River Wandle, which forms an important feature of the design, history and setting of the parkland. The river runs through the parkland and has been altered in places, incorporated into the design of the park, and features within the park (such as the Grade II Listed bridges installed by Hatfield) reflect the presence and importance of the River as a parkland feature. The river also formed the focus for industrial activities which characterise the Conservation Area (including Ravensbury Park and Listed buildings including Ravensbury Mill, discussed above) in addition to the parkland.
- 1.44. Industrial development along the River Wandle. This forms part of the character and historical background of the Conservation Area, Listed Buildings, such as Ravensbury Mill, and is connected with the development of Ravensbury Park.
- 1.45. The horticultural connections of the parkland. The kitchen garden was used for market gardening during the 19th century. The history of market gardening in the area is also an important feature of the Wandle Valley APZ, and its role in the history of this area is noted as such within the Conservation Area Character Assessment.
- 1.46. The trees which form features within Morden Park, such as the tree-lined avenue, and also comprise one of the key features of Ravensbury Park and thus the sub-area 5 part of the Conservation Area are a key component of the setting of the parkland, Listed Buildings and Conservation Area.
- 1.47. As a group the heritage assets all form key components of the setting of each other. Views The key views of the Registered parkland appear, for the most part, across relatively short distances. The principal house looks out over closely adjacent woodland, and lawned gardens to the north. Views toward Morden Hall are of principal importance from the driveway which leads to the hall, over a Grade II Listed bridge. The hall is only visible once the corner in the tree-lined avenue has been turned, coming into view as once proceeds westwards along this avenue. The south lodge installed by Hatfield (Locally Listed Building), located c. 25m west of the Site on the opposite side of Morden Road, can be seen along the road, although the majority of views outward from along this avenue are screened by the trees which line it. However the modern housing estate which lies within the Site is visible from the south-eastern end of the avenue, where it joins the main road (Morden

Road), adjacent to the south lodge installed by Hatfield (Locally Listed Building). Earlier views along the original driveway would also have been of importance. These views would not include the Site.

- 1.48. Views within the Conservation Area and parkland are general restricted due to the numbers of trees and residential development, including that within the Site. Views of the Site are not possible from the focus of Grade II Listed Buildings at Morden Hall, including the Grade II Listed hall itself, Grade II Listed Gate piers and Grade II Listed Bridge. Additionally woodland was observed to screen views from the Grade II Listed Pedestal and Statue of Neptune, Grade II Listed Pedestal and Statue of Venus and Cupid 50 Yards North of Morden Cottage, Grade II Listed Walls of the Walled Garden to the South of Morden Hall, Grade II Listed Snuff Mills and Grade II Listed Morden Cottage. Views of the Site from the majority of the Registered Park and Garden are screened by vegetation within the parkland Likewise the majority views from within the rest of the Conservation Area are similarly screened.
- 1.49. The Site, currently occupied by housing, makes no contribution to the significance of the Registered Park and Garden, Listed Buildings or Conservation Area. However, they are a representation of the historical processes that have dominated this area. With the development and closure of the industrial activity followed by two phases of residential development.
- 1.50. **Step 3: The effect of the proposed development on the significance of the asset.**
- 1.51. The proposed development would comprise the demolition of houses, and the construction of modern housing, including a three-storey block of flats (with setback fourth floor) at the corner of the Site (east of the south-eastern end of the avenue), with three storey pitched-roof houses fronting onto Morden Road to the east and south.
- 1.52. None of the key elements of setting contributing to significance would be altered. Although the details of views of the Site would be changed by more modern housing (as illustrated on Viewpoint 3 of the Visual Impact Study), the nature of these views would continue to be characterised by residential development, albeit improved, as the development proposals intend to deliver higher quality design than the present situation. The replacement of the extant housing estate with a modern, higher quality development would not change the land-use within the Site, and thus the character of the Site would remain unaltered. The details of the appearance of the new development will be developed at reserved matters. The proposed development has intended to respond to the local traditions and to the industrial history of the area, with the form of new buildings (i.e. pitched roofs to town houses) and proposed materials (including brick) complementary to local architectural traditions. The new buildings, including those taller than extant structures, would form part of a considerate development creating quality public realm along Morden Road, more harmonious with the Conservation Area and Registered Park and Garden than the present, worn and aesthetically displeasing estate. Furthermore, green landscaping and the provision of appropriate trees,

especially along Morden Road, would serve to complement the parkland character of the area. Such change would be considered an improvement of the current character of the setting along Morden Road. It can therefore be concluded that there would be no harm to the Conservation Area, Registered Park and Garden and associated heritage assets as a result of the proposed development with reference to the National Planning Policy Framework.

1.53. Summary

- 1.54. The assessment had shown that the development will not result in any harm to the significance of the majority of the designate heritage assets in the proximity of the Site, including the Grade II Listed Ravensbury Mill. Additionally there is an opportunity through appropriate detailed design of the new residential properties and the accompanying landscaping for the scheme to improve the setting of the Conservation Area and Registered Park and Garden. This assessment has established that although the development would introduce taller structures, which may be perceived as dominant, in the immediate vicinity of Grade II Listed White Cottage. This could result in limited harm to its significance, however, when weighed against the improved character of the well-designed street scene, the development will result in neutral effect on the significance of this Listed Building.
- 1.55. The proposal is therefore considered to achieve the objectives of policy EP R1 c) of the Estates Local Plan. As shown on the Illustrative Masterplan the existing set back building line along Morden Road is maintained and new tree planting is proposed adjacent to the Ravensbury Park entrance.
- 1.56. New streets provide enhanced visual and pedestrian connections with neighbouring Morden Hall Park and the Wandle Trail and river edge to the South of the site. Given the proximity to such quality open spaces, priority has been given to private garden spaces for homes instead of public open space within the site. Landscape enhancements include new tree planting and a swale which connects the green spaces throughout the estate.
- 1.57. As shown in the proposed scheme, developments are set back from the edge of Morden Road and follow a similar building line to that of the opposite Surrey Arms Public House thus assisting to create a sense of place on this corner. The maximum building height in this location, and across the estate, is 3 – 4 storeys. This helps to ensure that the proposals do not over dominate the existing Public House.
- 1.58. Furthermore it should be noted that both Historic England and LBM Conservation Officers were consulted on the proposed development and have raised no objections to the proposed scheme. The details of the appearance of the proposed new buildings will be developed at reserved matters and it is recommended that the design team takes into consideration the local character and provides explanation on how this character has been reflected in the detail design. At this outline stage it can be commented that the initial proposals have intended to respond to the local traditions and to the industrial history of the area, with the form of the buildings (i.e. pitched roofs to town

houses) and some of the proposed materials (including brick) complementary to local architectural traditions and therefore compliant with Policy of policy EP R1 c) of the Estates Local Plan

1.59. Locally listed buildings nearby.

- 1.60. The Locally Listed Buildings have also been considered as part of this assessment. It has been established that majority of these do not require a detailed assessment. However, the Locally Listed Building Morden Hall Park Lodge adjacent to Surrey Arms Public House (which is not Locally Listed), located c. 25m west of the Site, has been included and is discussed as part of the Wandle Valley Conservation Area.
- 1.61. The visual impact of the Ravensbury Estate in its existing form is neutral. The scale and architecture of the existing buildings work well in their existing context, though the density of the built form is rather low on the estate. The proposed development is considered to be modest in scale and massing which has remained mostly two storeys except in areas where there is considered to be an opportunity to increase the height up to 4 storeys. As such given the sensitive approach that has been adopted in the design of this scheme it is considered that the proposal would not have a detrimental impact on the visual amenities of these neighbouring buildings of special interest and would instead provide a positive contribution to the existing townscape, character and local distinctiveness of the area in accordance with the Estates Local Plan 2018. Condition 50 would ensure that historical and archeological interests are safeguarded.

20.0 PUBLIC OPEN SPACE AND AMENITY SPACE

- 20.1 The site is surrounded by designated open spaces at Morden Hall Park and Ravensbury Park.
- 20.2 The proposals will result in the reconfiguration and re-allocation of existing amenity spaces within the estate. Currently the existing amenity space on Ravensbury comprises 3,880sq.m, laid out mainly as green spaces (e.g. in front of the existing community centre). The proposal would provide a total of 6,858sq.m of public amenity space on the estate, an increase of 57% (2,978sqm). Appearance and landscaping of this space will be considered at a later date as part of Reserved Matters and a planning condition has been added to this effect.
- 20.3 Although each house will have a private garden, due to the increase in number of homes, streets and roads and publicly accessible amenity space, there will be a reduction in private amenity space from 16,268 sqm existing to 9,288sqm, a loss of 6,980sqm.
- 20.4 The Ravensbury estate sits between two large parks (Morden Hall Park and Ravensbury Park) and the site's location combined with the increase in publicly accessible amenity space is considered to compensate the reduction in private amenity space. Therefore it is considered that the reduction in

overall private amenity space will not cause detrimental harm to the amenities of existing and future occupants of the site.

- 20.5 It is also worth noting that the proposal would remove a small section (c.20sqm) of green space which acts as highways land and the end of Hengelo Gardens. This 20sqm is designated as 'Open Space' within the LBM Policies Map 2014, therefore this Outline Planning Application was advertised as a departure from the statutory development plan for the purposes of open space. The purpose of removing this minor part of the green space is to provide a turning head for vehicles on Hengelo Gardens. The need for such works has come out of consultation with local residents and in the interest of public highway safety. It is also worth noting that, although public realm improvements are being made to Hengelo Gardens, the proposed redevelopment of buildings would not extend as far as this part of the area as buildings located in Hengelo Gardens will be retained. The works are considered part of overall highway improvements in the area. Furthermore, given that there would be additional publicly accessible amenity space of +2,978sqm and the Ravensbury Estate sits within two large parks it is not considered that this modest loss of existing green space would have a significant impact on the wider ecology, biodiversity or nature conservation of the area.
- 20.6 Play space
- 20.7 Draft Policy EP R5 requires play space provision having regard to the Mayor of London's 'Play and Information Recreation' supplementary planning guidance (2012). The policy also requires development proposals to be supported by an analysis of current and future need for the provision of indoor and outdoor sports facilities, with any proposals having regard to Sport England's Planning for Sport Aims and Objectives.
- 20.8 Merton's Core Planning Strategy policy CS 13 and The London Plan policy 3.6 require housing proposals to provide play spaces for the expected child population and the Mayor of London's 'Play and Informal Recreation' SPG 2012 provides detailed guidance on this matter.
- 20.9 The D&A Statement indicates that 3 new areas of publically accessible doorstep play space will be provided on site, which is considered suitable in principle. However the location and size of these areas need further clarification to ensure these meet the requirements in line with the Mayor's SPG. Page 99 of the DAS states provision of at 120sqm, however page 2 of the DAS supplement states that up to 620sqm will be provided. As there is no play space within 100m actual walking distance of the site, the minimum space required must be provided on site.
- 20.10 Any doorstep play proposed within the public realm areas needs to be designed in accordance with the SPG and must be safely accessible. Ravensbury Park play ground includes a slide, climbing boulders, swings, and a wheelchair accessible roundabout.

- 20.11 There are also other play space equipment's located nearby with approximate 'actual walking distance' from the estate to the play space in Morden Hall Park of between 611m and 852m, which provides additional play space for children of all ages.
- 20.12 It is therefore considered that there would be adequate amounts of play space for all ages in accordance with local and national policies and guidance. In any case the proposed provision for play space would be further assessed at reserved matters stage to ensure adequate play space has been considered for the child yield calculation to each phase of the development.
- 20.13 Sport England
- 20.14 The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation. Active Design Sport England met with the applicant on (8/12/2017) to discuss Sport England's Active Design guidance. Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. Sports England have confirmed that the applicant's demonstrated that they had incorporated elements of the 10 principles set out in the document through the layout and design of the facilities on site.
- 20.15 As such Sports England does not object to this proposed outline planning application.

21.0 Noise

- 21.1 The NPPF (2012) states that policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, by mitigating and reducing noise to a minimum (including through the use of conditions). However, the NPPF (2012) recognises that development itself will often create some noise.
- 21.2 Policy 5.3 of the London Plan (2016) states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments. This includes minimising noise pollution. Policy 7.15 of the London Plan (2016) states that development proposals should seek to manage noise by mitigating and minimising the existing and potential adverse impacts of noise from within, as a result of, or in the vicinity of new development without placing unreasonable

restrictions on development. It is recommended that to accord with policy at Reserved Matters stage when the detailed design would be confirmed, a Noise and Vibration Mitigation Strategy be submitted to the Local Planning Authority for approval. This document shall explain noise attenuation measures for the proposed uses, including noise barriers, specified glazing and ventilation and orientation / layout of buildings and amenity areas.

- 21.3 An acoustic report has been prepared by Peter Brett Associates LLP (PBA) in support of the outline planning application. A fully automated environmental sound survey was undertaken in order to determine the current sound climate at the site. This was supplemented with an acoustic model of the site.
- 21.4 Based on measured external noise levels, Morden Road is the predominant environmental noise source within the vicinity of the site. As such, consideration would need to be given to the orientation of buildings close to the road, along with the acoustic requirements of façade elements to ensure external and internal noise criteria are met. Furthermore it should be noted 'Plant Noise' limits have been provided to reduce the impact from any external plant associated with the community centre.
- 21.5 In summary, the assessment has demonstrated that, with appropriate mitigation, the site is suitable for residential development. The final specifications for the noise reduction measures would be considered during detailed design with further details to be provided at the Reserved Matters stage, in accordance with Policies 5.4 and 7.15 of the London Plan (2016), Policy DM EP2 of the Local Plan 2014 and Policy CS 15 of the Core Planning Strategy 2011. Conditions have been attached to this effect.

22.0 Sustainability and Climate Change Mitigation

- 22.1 Paragraphs 96-98 of the NPPF (2012) relate to decentralised energy, renewable and low carbon energy. Chapter 5 of the London Plan (2016) contains a set of policies that require developments to make the fullest contribution to the mitigation of carbon dioxide emissions. The application site is one of three Merton's Estate Regeneration Projects that is being brought forward in terms of seeking to obtain outline planning permission. Officers consider that the scheme being the smallest out of the three sites would not require decentralised energy centre. Particularly as the other two schemes at High Path and Eastfields are seeking to provide an opportunity for an onsite energy centre with an adequately sized floor space that will accommodate the application site and potentially other neighbouring properties or developments to be undertaken in the future within the area.
- 22.2 The proposal would require a reduction in carbon dioxide emissions by at least 35% compared to the 2013 Building Regulations to accord with the London Plan (2016). The applicant would need to demonstrate the measures set in the Energy Statement accompanying the planning application and would also require confirmation as to what measures have been implemented in the construction of the development. Any shortfall in compliance with the

carbon reduction target should be safeguarded by the requirement to make a financial contribution to the Council's Carbon Offset Fund.

- 22.3 The estimated percentage reduction after the implementation of the measures of the 'Be Lean' stage is 8.30%. There are no reductions at the 'Be Clean' stage as no CHP has been used. The estimated percentage reduction after the implementation of the measures of the 'Be Green' stage is 31.25%. Overall, the development achieves a regulated CO2 saving of 39.5% beyond Part L 2013 baseline. Any remaining shortfall in CO2 emissions will be subject to carbon off-setting facilities.
- 22.4 The use of PV panels mounted on the roofs has been considered to be a cost effective technology that will supply electricity directly to the buildings on clear days. If there is a surplus this could be sold to the grid. The electricity generated by these systems will feed into the landlord's electrical system.
- 22.5 The use of photovoltaic is expected to provide an increase in the amount of sustainable energy generated by the panel. The panels will be located on the roofs of the buildings covering a total area of 1299sq.m.
- 22.6 The use of potable water will be reduced to below 105 litres per person per day complying with the notional standards and the London Plan policy. This will be achieved by the use of aerated taps, mains powered showers and dual flush WCs. Water meters will be specified as these help to reduce significantly the water use and will reduce the short-term impact on water supply resources in the area.

23.0 The acceptability of the scheme in terms of the environmental impacts

23.1 Flood Risk and Drainage

- 23.2 The site falls within Flood Zone 2 and 3. Having reviewed the submitted FRA dated November 2017, the Environment Agency is satisfied with the proposal would not address the flood risk concerns
- 23.3 A number of revisions and updates have been undertaken to the previous FRA based on comments made by Merton's Lead Local Flood Authority (LLFA) and the Environment Agency and subsequent meetings with the applicants design team.
- 23.4 The site is located within Flood Zone 3a and the most significant risk of flooding to the site is associated with the River Wandle. As flood mitigation, all finished floor levels for residential uses on the site are now raised above the 1 in 100 year + climate change (35%) + 300mm (freeboard). Modelled flood levels across the site vary and are specified in section 5.2 of the Flood Risk Assessment. Flood depths are greatest in the central area of the site and are generally shallower at the perimeters of the site. The following flood risk mitigation measures are proposed, but will need to be designed in detail at the reserved matters stage:

- External areas will be profiled to shed surface water away from the properties.
- A new surface water drainage system will be provided which will incorporate attenuation devices to accommodate storms up to the 1%+CC event.
- New SuDS features will be incorporated within the landscaping to store and treat surface water run-off.
- All bedrooms to the houses will be provided at first floor level or above.
- Flood resilient materials will be used throughout the ground floor construction.
- Green roofs are to be provided to all but one of the blocks of flats.
- Roof attenuation is to be provided beneath the green roof system which will restrict discharge rates and accommodate a 1 in 100+CC event.
- Permeable paving will be used for all parking bays.
- Garden levels will be adjusted and re-profiled where required to ensure that any loss of floodplain volume will be compensated for on level for level basis.
- All units to be signed up to the EA's flood warning system and given copies of the site-specific Flood Evacuation Plan.
- All wheelchair units will be located in an elevated flat block.

23.5 All buildings will be raised above the design flood level and a void system which allows floodwater to pass beneath the properties is proposed. This will ensure that there is no loss of floodplain storage. It is important that at the reserved matters stage, that a level for level and volume for volume compensation scheme is proposed. In addition, all voids on the buildings shall be to the EA specification and take full consideration of flood flow direction/conveyance. The revised FRA has also considered floodplain compensation based on the indicative phasing plan provided, to ensure no losses occur during construction of each phase.

23.6 With reference the drainage strategy, the indicative drainage layout drawing (Appendix I) for the site will discharge to the river on the southern boundary. The site wide flows will be controlled via a hydro-brake with flows restricted to a total of 41 l/s for all events up to the 1 in 100 +30% event. Surface water attenuation will be provided to accommodate all storms up to the 1 in 100+30% event. Based upon the outline planning application layout, a variety of attenuation devices are proposed:

- Roof top attenuation to Blocks D, F, M & Q = 1000m² of blue roof attenuation will be provided below the green roofs, made up of 100mm deep tanks to provide approximately 50m³ storage.
- Attenuation within the permeable roads and paving sub-base. Permeable paving is proposed for all parking bays across the site. At present, the volume of attenuation within the parking bays has not been included within the attenuation calculations.
- Swale – For the outline application, the preliminary details indicate it will be in the order of 170m long in total, and assuming a 0.15m³ of volume per metre run it would provide approximately 25m³ of

attenuation. Within the Phase 2 drainage system 15m³ of attenuation has been allowed for within the swale.

- Oversized pipes - due to the limited available cover within the new roads the pipes linking the hydro-brakes to the attenuation tanks has been restricted to between 675 - 300 dia, which will provide 30 m³ of attenuation across the phases.
- Shallow below ground attenuation tanks within the garden areas.

Phase 2 – 190m³

Phase 3 – 290m³

Phase 4 – 304m³

Total below ground attenuation = 784m³

23.7 In total 879m³ of attenuation is provided at the outline stage, across Phases 2 to 4. Refer to Appendix J of the FRA for drainage calculations.

23.8 A number of drainage diversions are proposed in order to maintain the supply to the existing dwellings as each phase is constructed. Any diversions of adopted sewers or highway drainage should be the approval of Thames Water or the Highway Authority.

23.9 SUSTAINABILITY/EIA.

23.10 No screening opinion is required to be carried out.

23.11 Air Quality

23.12 LB Merton's Supplementary Planning Guidance (SPG) has been produced to address common air quality issues affecting the Borough and assist in providing a consistent approach to new development. The primary aim of this SPD is to supplement existing Local Plan Policies which seek to improve air quality in the Borough. This SPD is a material planning consideration when determining applications for planning permission and forms part of the Local Plan.

23.13 Air quality fund

23.14 Where it is not possible to fully mitigate the air quality impacts of a new development or the Air Quality Neutral benchmarks are exceeded, developers will be required to off-set the additional emissions by making a financial contribution to the Borough's Air Quality Action Fund. This will be levied at the following rates and updated periodically:

- **traffic impacts** - £25 per car parking space including private garages for residential development
- **building impacts** - £100 for 1,2 bed properties, £150 for 3, 4 bed properties and £200 for 5 bed or more; mixed

use/commercial/community/public schemes should contribute £10 per 10 m² gross floor area

23.15 Air Quality Fund (AQF)

23.16 Developers should seek to further mitigate the residual impacts and provide local off-setting measures to deal with any adverse air quality impacts associated with development proposals, including if the development fails to meet one or more of the AQN benchmarks. Where it is not possible to fully mitigate the air quality impacts of a new development or the AQN benchmarks are exceeded, developers will be required to off-set the additional emissions by making a financial contribution to the Borough's Air Quality Action Fund (AQAF). This will be levied at the following rates, and updated periodically:

- **traffic impacts** - £25 per car parking space including private garages for residential development, excluding dedicated electric vehicle charging spaces.
- **building impacts – residential development** - £100 for 1 or 2 bedrooms, £150 for 3 or 4 bedroom properties, £200 for 5 bedroom or more properties
- **building impacts – non residential development** - mixed use/commercial/community/public schemes should contribute £10 per 10 m³ gross building volume.

23.17 Construction Phase

23.18 The construction phase of major development can result in emission of air pollutants that adversely affects human health. To ensure that emissions are well controlled all planning consents for major development will include relevant planning conditions to reduce these impacts.

23.19 Air Quality and Dust Management Plan

23.20 An Air Quality and Dust Management Plan (AQDMP) must be submitted for approval in accordance with *The Control of Dust and Emissions during Construction and Demolition SPG*. The applicants have not submitted this in detail which will be required at Reserved Matters stage. The AQDMP will need to set out the measures to reduce the impacts during the construction phase. Monitoring of emissions will be required for all major development. The techniques to be used will depend on the development. For medium and high risk construction sites real-time monitoring will be required. The monitoring system should include an automatic alert direct to the site manager so that when dust levels breach acceptable limits action can be taken swiftly and effectively. This monitoring must be undertaken for a reasonable period before, during and after the works. The monitoring process will require financial contributions which will be secured as part of the s106 legal contributions.

23.21 The AQDMP may also be integrated within a wider Construction Environmental Management Plan (CEMP). The AQDMP should include the following;

- The emissions standards that the non-road mobile machinery (NRMM) used on-site will meet (see next section);
- Details of monitoring of dust emissions; and
- Details of the site specific mitigation measures that will be employed on-site.

23.22 The above will be imposed by way of condition as part of this outline planning application which would ensure that the amenities of occupiers and neighbouring amenities are protected from the poor air quality arising during the phased construction works on the neighbouring vicinity in accordance with Policy 7.14 of the London Plan (2016), Policy DM EP4 of the Local Plan 2014 and Policy CS 15 of the Core Planning Strategy 2011.

23.23 **Ecology and Biodiversity**

23.24 A Preliminary Ecology Appraisal report has been prepared by SLK consulting in support of the outline planning application.

23.25 The application site has a low to medium density and assessment report found the area to have negligible intrinsic ecological and nature conservation value.

23.26 The survey concluded that there where no bat roosting during the bat survey work that was undertaken for the whole application site. It is considered unlikely that the important bat roosts (i.e. breeding or hibernation roosts of common species, or roosts of spare species) will be recorded within the properties in the application site and it is likely that any roosts that may be present would be small, supporting low numbers of common species, for which appropriate mitigation and enhancement could be undertaken under license from Natural England.

23.27 Whilst the application site is considered to be of low ecological importance, to the immediate south and east of the site boundary lies the River Wandle, an associated diversionary channel, and woodland habitat. Whilst the habitats are of low to moderate intrinsic value for nature conservation, they provide a significant ecological function in the form of providing a green corridor through the urban landscape. This function has been recognised in the statutory designation of the upper river Wandle and Associated Habitats Metropolitan Site of Importance for Nature Conservation. The bat surveys that were carried out had recorded the presence of a small number of common pipistrelle bats commuting and foraging along this corridor.

23.28 The proposed development has been designed to avoid or mitigate either direct or indirect negative impacts on the adjacent wildlife sites, and particularly those that could harm their function as a wildlife corridor. As such

the proposal in its current design form and scale is anticipated to have no significant negative impact on nature conservation or ecological value.

23.29 Therefore the proposed development on this site would represent an opportunity to significantly improve the biodiversity of the area and it is proposed this be achieved through the provision of open space and landscaping opportunities at the Reserved Matters stage. Accordingly, the proposal would comply with Policy 7.19 of the London Plan (2016), Policy DM O2 of the Local Plan 2014 and Policy CS 13 of the Core Planning Strategy 2011, and which will be secured by condition on the outline permission. **Conditions** 10 & 51 are imposed in order to safeguard neighbouring ecology and bio-diversity.

23.30 Land Contamination and Remediation

23.31 The 'Ground Condition Assessment and Contamination and Stability' report has acknowledged the following in terms of the sites current ground conditions;

23.32 **Ground Conditions:** The available geological data indicates that the Site is underlain by Alluvium, River Terrace Deposits and the London Clay Formation. It is expected that the natural strata are overlain by Made Ground associated with the previous and present developments of the Site. Groundwater is expected to be present at a shallow depth.

23.33 **Preliminary Geo-environmental Assessment:** The potential for significant contamination to be present across the site as a whole associated with its history is considered to be **Low** with **Moderate** potential for localised residual contamination to be present.

23.34 **Preliminary Ground Stability Risk Assessment:** A review of potential geological hazards has identified the risk of land instability or for potentially adverse foundation conditions to be present, in general, to be **Negligible/Very Low/Low**. The exception relates to a **Moderate** hazard potential for the site to be affected by compressible ground in the Alluvium, running sand in the Alluvium and the Taplow Park Gravel, and shrinkable ground in the Alluvium and the London Clay Formation. Therefore foundations at construction stage will need to be designed to accommodate the movement or be taken to a depth where the likelihood of damaging movement from shrinking or swelling of clay soils is low.

23.35 In this instance Officers consider the scheme is acceptable subject to the imposition of conditions to ensure the site is free from risk of contamination during all stages of the construction process. The key areas for submission for approval include:

- A Desk Study (Stage 1) of the nature and extent of contamination on-site is carried out;
- Site Investigation (Stage 2) determined the presence of contaminants with the full methodology and detailed results of the investigation provided. An

appraisal of proposed remedial actions is also required to be submitted for approval.

- Remediation Strategy (Stage 3) is where contamination is found which poses unacceptable risks, a detailed remediation scheme to bring the site to a condition suitable for the intended use is required. The scheme must include proposed remediation objectives and remediation criteria.
- Reporting of Unexpected Contamination during the course of the construction
- Verification (Stage 4) is where required, the contamination shall be fully treated and completed wholly in accordance with the
- Approved measures in the remediation strategy. A verification report (that demonstrates the effectiveness of the remediation carried out) must be approved by the Local Planning Authority.

23.36 **Conditions 29 & 30** have been imposed to ensure appropriate further assessments are carried out in regards to land contamination. A demolition and construction method statement is also required to be submitted by the applicant prior to any phase of the development.

24.0 Accessibility and Inclusivity

24.1 10% of the total number of units would be wheelchair accessible that would accord with Policy 3.8 of the London Plan (2016). The outline scheme would also provide a car parking space to disabled standard for each of the wheelchair units (1:1). This would accord with the provisions of the London Plan (2016) including Policy DM T3 of the Local Plan 2013 and Policy CS 20 of the Core Planning Strategy. Furthermore this would be secured by way of condition on the outline planning permission.

25.0 Trees

25.1 An Arboriculture tree Survey and Arboricultural Impact Assessment has been prepared by Tamla Tree Ltd for this proposed outline planning application. The tree survey carried out revealed that there are 49 trees on site. The categorisation of these trees in terms of quality and amenity value was assessed in line with British Standards BS5837. Of the 49 trees that were surveyed 15 of the trees were sited outside the scope of the assessment whereby access was not available to the rear gardens, and where trees are thought to be retained where possible. However the surveyors have confirmed within the assessment that the quality assessment of these trees would be made when access becomes available.

25.2 The survey of the trees on site revealed the following;

- **2** of the trees that were categorised as (as green) were considered as 'trees of high quality and value: in such a condition as to be able to make a substantial contribution' – **None of these trees are proposed for removal.**
- **20** of the trees that were categorised (as blue) were considered as 'trees of moderate quality and value: those in such a condition as to make a significant

contribution' – **8 of these trees are planned to be removed in order to facilitate the proposed development.**

- 9 of the trees that were categorised (as grey) were considered as 'trees of low quality and value: currently in an adequate condition to remain until new planting could be established' – **8 of these trees are planned to be removed in order to facilitate the proposed development.**
- 3 of the trees that were categorised (as red) were considered as 'trees in such a condition that any existing value would be lost within 10 years and which should, in the current context, be removed regardless of development' – **all trees to be removed in order to facilitate the proposed development.**

25.3 The proposal would also result in a financial contribution of £561,562.50 towards street trees and / or public realm. This would accord with the principles set in the Waltham Forest Revised Planning Obligations SPD (2014) and would be secured as an obligation to any s106 Agreement. The location for such trees and / or public realm will include landscaping along Orient Way that would assist in the creation of a new mixed use neighbourhood, rather than being dominated by arterial roads as is currently the case.

25.4 The council's Arboriculture Officer has been consulted throughout the outline application stage and following on going discussion has confirmed approval of the scheme subject to the imposition of a robust condition to ensure that the applicant provides an Arboricultural Method Statement and a Tree Protection Plan with the planning application at Reserved Matters stage showing details of the proposed new trees (size, species & locations).

26.0 Refuse and Recycling

26.1 Officers consider that there is the option of a waste management scheme that would avoid excessive trips for waste collection. Further details would be required at the Reserved Matters stage and is secured as a condition to the outline planning permission.

26.2 The proposal would not use an Underground Refuse System, all refuse and recycling storage/collection would be carried out in the conventional manner.

26.3 At present, waste at the site is stored at the rear of each property throughout the week, inside upright plastic wheelie-bins and recycling crates. On collection day all waste, including recycling and food waste, is placed outside of each property by its residents, for collection by the LBM. Recycling and food waste is left out in crates and caddies respectively, with general waste left out in black bin liners.

26.4 The proposal would have to comply with Local Plan Policy 5.17 in terms of providing suitable waste and recycling storage facilities as part of the proposed development.

26.5 Houses being serviced for refuse and recycling will be directly adjacent to the individual dwellings, whilst flats would have communal bin stores. Full details

of the indicative refuse strategy have been included in the Design and Access Statement, and this is supplemented by the Design Code in relation to the design approach to be taken to storage facilities.

- 26.6 The bin stores will have storage facilities integrated within the development, the waste storage would be for; general waste, recycling and food waste and will be designed for access by the Councils waste collection teams on waste collection days.
- 26.7 The refuse and recycling strategy would be further assessed at the reserved matters stage and would be conditioned to ensure the storage/design of these facilities are up to the highest standards and accessible for collection purposes to the satisfaction of the LPA.

27.0 Archaeology

- 27.1 An Archaeology report has been prepared by Cotswold Archaeology comprising of Heritage Desk-Based Assessment for Ravensbury Estate in support of this outline planning application. The objective of the assessment was to identify the nature and extent of the recorded heritage resource within both the site and its immediate environs.
- 27.2 The Site lies within the Mitcham/ Wandle APZ, characterised by industrial activities and market gardening. The post-medieval and modern potential within the Site relates primarily to features associated with industrial activities lining the River Wandle, and including a printworks and bleaching buildings and grounds. Former canalised channels of the Wandle may survive within the Site. There is also potential for former houses within the Site, and a farm and possible agricultural building to survive below ground.
- 27.3 Historic England have considered the submitted 'Heritage Document' and are in support of this proposed scheme for outline planning application. Notwithstanding Heritage England acknowledge that there is discernible on-going archaeological interest within the site, mainly in respect of the prehistoric and industrial period in the area. As such the imposition of a condition to any planning permission for the archaeological position is to be reserved is recommended. This would involve works not commencing until the applicant has secured the implementation of a programme of archaeological work. Historic England (Greater London Archaeological Advisory Service) has requested a condition be imposed as part of any outline planning permission that comprises a thorough archaeological investigation.

28.0 Secured By Design

- 28.1 A number of detailed comments have been made in respect of the principles and practices of Secured by Design. These are matters that the scheme architect will respond to and adopt as part of the detailed design at Reserved Matters stage. In addition, it is the responsibility of any developer to adhere to the principles and practices of Secured by Design and Safer Places and apply

through an accreditation process that is overseen by the Metropolitan Police separately outside of the planning process

29.0 SECTION 106 LEGAL AGREEMENT

29.1 Planning obligations, enforced through Section 106 (S106) legal agreement (Town and Country Planning Act 1990 (as amended)), assist in mitigating the impact of potentially unacceptable development to make it acceptable in planning terms however they should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning obligations should also only be sought where they meet all of the following tests within the Community Infrastructure Levy regulations 2010:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

29.2 Where obligations are being sought, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. An approval subject to a S106 is not final until the S106 agreement has been completed and signed by all parties.

29.3 A section 278 (S278) agreement (Highways Act 1980 (as amended)) is a legally binding document between the Local Highway Authority and the developer to ensure that the work to be carried out on the highway is completed to the standards and satisfaction of the Local Highway Authority.

29.4 The document is prepared by the Local Highway Authority's solicitor and issued to the developer's solicitor in draft format. The details of the agreement are then agreed before the final document is completed and signed by both parties before the commencement of any work on site.

29.5 The agreement details what the requirements of both the Local Highway Authority and developer are to ensure that the proposed works are carried out in accordance with the approved drawings. It also details how the Local Highway Authority may act should the developer fail to complete the works.

29.6 Paragraph 203 of the National Planning Policy Framework states "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions". Paragraph 206 of the National Planning Policy Framework states "Planning conditions should only be imposed where they are:

1. Necessary;
2. relevant to planning and;
3. to the development to be permitted;
4. enforceable;
5. precise and;

6. reasonable in all other respects.”

- 29.7 Should the application be approved, there are S106 (including S278) heads of terms recommended in addition to recommended planning conditions to ensure that the development is acceptable in planning terms, and does not result in an undue impact on local parking and highways conditions from construction through operation, an undue impact on the amenities of the occupiers of the adjoining and surrounding residential and commercial properties, delivers the maximum amount of on-site affordable housing the scheme will viably allow and contributes towards sustainable energy provision and biodiversity gains.
- 29.8 The recommended planning conditions and S106 heads of terms are laid out further below. The relevant S106 legal agreement between LBM and Clarion shall include the following heads of terms (as is normal practice, obligations as specified are still subject to further negotiations. The Committee will be provided with an updated position at the Committee meeting). Furthermore it should be noted that there must be connection between the Overarching agreement and this S106 agreement.
- 29.9 This outline permission is GRANTED subject to conditions and informatives and completion of a Section 106 Agreement with the following Heads of Terms:

Overarching Head of Terms for all three estates (Eastfields (17/P1717), High Path (17/P1721) and Ravensbury (17/P1718))

- a) **Linkage across three schemes** to ensure collectively that all three proposals are financially viable
- b) **Affordable housing** – minimum of 726 affordable homes with replacement affordable homes to be offered to existing tenants on basis of existing tenancy rights
- c) **Affordable housing viability review mechanism** – undertaken at specific times during delivery of the three schemes to see if any financial surplus to be used towards affordable housing policy compliance across the three estates
- d) **Financial viability model**, its inputs and assumptions used to be agreed in advance.
- e) **Delivery: Provisions** to ensure that all three estates are connected for viability and built out in reasonable time, and to secure the delivery of works in kind and the payment of contributions set out in the Section 106 Agreement.
- f) **Developer to meet council’s reasonable legal costs** for drafting S106 agreement

g) Developer shall meet council's reasonable costs of monitoring S106 agreement

Ravensbury specific Heads of Terms

All sums payable by the developer pursuant to the s106 agreement will be index linked

h) Affordable housing:

- i. 89 social rented units, and
- ii. 3 affordable rented units

i) **Affordable housing viability review mechanism:** the developer to undertake a viability review at specified timescales during the delivery of the development. This will identify whether the development generates any financial surplus, including through unspent section 106 contributions returned to the developer, that could be used to provide additional affordable housing (details to be provided in full in the s106) to achieve policy compliance.

j) **The agreed financial viability model:** shall be consistently applied in the viability review for all phases of the development as agreed as part of the overarching s106.

k) **The baseline affordable housing specification and tenure mix schedule:** to be agreed, in line with the Statutory Development Plan.

l) **Highways works** within London Borough of Merton: the developer shall prior to first occupation of each "relevant work phase" either

- a. complete the highway works as set out below at its own cost; or
- b. pay to the Council a specified reasonable contribution to be calculated by the Council. Such off-site highway works which may include but not be limited to:
 - i. Renewal/addition of any footpath or carriageway;
 - ii. Removal/addition of any crossover;
 - iii. Reinstatement/Provision of any dropped kerbs;
 - iv. Removal/addition of single/double yellow lines and other road markings and signs and related traffic management orders;
 - v. Carriageway resurfacing to the site entrances;
 - vi. Revisions to street lighting;
 - vii. Relocation of any services if and where necessary;
 - viii. Drainage;
 - ix. Any works required as a result of the Highways Impact Assessment; and
 - x. Repair of damage caused to the highway as a result of any works related to the development.

m) Highways standards

- n) **Traffic Calming Measures:** the Developer to introduce traffic calming to keep vehicle speeds low along the junction of Morden Road and Ravensbury Grove.
- o) **Pedestrian crossing improvements and cycle improvements within the vicinity of Ravensbury Estate,** particularly links between Morden Hall Park and Ravensbury Park.
- p) **Parking management plan within the estate** on phase by phase basis
- q) **LBM on street parking controls (CPZs)** - developer to fund reasonable costs of undertaking a public consultation on surrounding residential streets and if CPZs are required to be created or extended, then to fund reasonable costs of these works.
- r) **Permit free for new residents** from existing/new CPZs beyond Ravensbury Estate
- s) **Delivery and servicing plan**
- t) **Car club**
- u) **Works associated with utilities diversion** to also connect to LBM highways / drainage assets as necessary
- v) **Energy Strategy** submission and approval in writing.
- w) **Zero carbon contribution**
- x) **Noise and air quality** monitoring and mitigating
- y) **Re-provision of the existing community centre**
- z) **Open spaces including public realm, private courtyards, children's playspaces** – developer to provide at relevant phases, manage and maintain at own cost and keep publicly accessible.
- aa) **Access to Ravensbury Park** - improvements to entrance
- bb) **River Wandle footbridge**
- cc) **Lifts**
- dd) **Delivery** provisions to secure the completion of the redevelopment of the Ravensbury Estate, delivery of works in kind and the payment of contributions as set out in the Section 106 Agreement.

RECOMMENDATION.

That the Planning Committee **GRANT** outline planning permission subject to conditions, referral to the Greater London Authority (under The Town and Country Planning (Mayor of London) Order 2008)) and the completion of a s106 Agreement to include the Heads of Terms as outlined in Section 26 of this committee report.

30. CONDITIONS

COMMENCEMENT

1. The development shall commence not later than three years from the date of this permission or two years from the final approval of the last Reserved Matters application, whichever is the later.

REASON: In order to comply with the provisions of Section 92 of The Town and Country Planning Act 1990 (as amended).

2. **Approval of reserved matters:** Approval of the details shown below (the Reserved Matters) of development for each phase of development shall be obtained in writing from the Local Planning Authority before any development in that phase is commenced:

- Appearance; and
- Landscaping.

3. **Timely delivery** No Reserved Matters approval for the relevant phase of development shall be implemented more than 2 years from the date of the final approval of any Reserved Matters application for that phase, whichever is the later.

REASON [for Conditions 2 and 3): In order to comply with the provisions of Section 92 of The Town and Country Planning Act 1990 (as amended).

4. **Approved plans:** The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

0100 REV E, 0113 REV E, 0114 REV G, 0115 REV D, 0151 REV E, 0152 REV D, 0153 REV D, 0101 REV E, 0113 REV E, 0114 REV G, 0115 REV D, 0121 REV D, 0151 REV E, 0152 REV D & 0153 REV D.

REASON: For the avoidance of doubt and in the interests of proper planning.

5. **Phasing Strategy** Upon submission of the first Reserved Matters application, a Phasing Strategy setting out the delivery of the phases across the whole site shall be submitted to and approved in writing by the Local Planning Authority. The Phasing Strategy shall confirm the order and timing of delivery of each of the phases.

REASON: To ensure the scheme is delivered as proposed in accordance with Policies 3.5 and 7.3 of the London Plan (2016), Policy DM D2 of the SPP Local Plan 2014, Policy CS14 of the Core Planning Strategy 2011 and Policies EP R1, EP R2, EP R3, EP R4 and EP R8 of the Adopted Estates Local Plan 2018.

6. Delivery of non residential floorspace Prior to commencement of each of the relevant phases of development hereby permitted, a plan linking the delivery of the quantum of non-residential floor space to the completion of the residential units within that relevant phase of development shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the appropriate minimum amount of non-residential floor space is provided as part of the development in order to maximise delivery of employment opportunities in line with Policy 2.17 of the London Plan (2016), Policy DM E3 of the SSP Local Plan, Policy CS12 of the Core Planning Strategy 2011 and Policy EP R4 of the Adopted Estates Local Plan 2018.

7. Development to be carried out in accordance with permission: Reserved Matters applications should accord with the submitted Development Parameters (Plans and Schedule) and Design Code, or such updated / replacement Development Parameters (Plans and Schedule) and / or Design Code approved in writing by the Local Planning Authority.

REASON: In order to comply with the provisions of Section 92 of The Town and Country Planning Act 1990 (as amended).

8. Urban design: Applications for approval of Reserved Matters for each relevant phase of development submitted pursuant to this permission relating to appearance and landscaping shall be accompanied by an Urban Design Report, which explains the approach to the design and how it takes into account the approved Design Code. This document should also include measures to minimise the risk of crime in a visually acceptable manner and meet the specific security needs of that phase of development.

REASON: To ensure good design throughout the development in line with the principles set in the NPPF (2012), Policies 3.5 and 7.3 of the London Plan (2016), Policies DM D1, DM D2 & DM D4 of the SPP Local Plan 2014, Policies CS2 & CS14 of the Core Planning Strategy 2011 and Policies OEP.1, OPE.2 and EP R4 of the Adopted Estates Local Plan 2018

9. Energy strategy Applications for approval of Reserved Matters submitted pursuant to this permission relating to appearance shall be accompanied by an overarching Energy Strategy for all phases. For each subsequent relevant phase of development thereafter, an updated detailed Energy Strategy shall be submitted to the Local Planning Authority for approval prior to commencement of that relevant phase. The Energy Strategies shall explain:

- How the proposed design realises opportunities to include design and technology energy efficiency measures;

- The reduction in carbon emissions achieved through these building design and technology energy efficiency measures compared with the emissions permitted under Building Regulations prevailing at the time the application(s) for approval of Reserved Matters are submitted;
- The specification for any green and / or brown roofs;
- How energy shall be supplied to the buildings highlighting:
- How the buildings relate to any side-wide strategy for district heating incorporating co- or tri-generation from distributed combined heat and power; and
- Any other measures to incorporate renewables.
- Preparation of a Site Waste Management Plan to comply with Best Practice Standards. Confirm what measures will be implemented in the construction. The approved measures shall be fully implemented in accordance with the approved details prior to the first occupation of any of the residential units hereby approved. A statement of verification from a suitably qualified expert shall be provided to the Local Planning Authority and agreed in writing to confirm compliance with the provided details prior to occupation of any of the residential units hereby permitted.

REASON: To ensure the development contributes to climate change mitigation by meeting the highest standards of sustainable design and construction achieving an adequate reduction in carbon dioxide emissions from on-site renewable generation, in accordance with the principles set out in the Energy Statement and in accordance with Policies 5.1, 5.2, 5.3, 5.5, 5.7, 5.8, 5.9 and 5.11 of the London Plan (2016), Policies DM EP1 of the SPP Local Plan 2014, Policies CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

10. Ecology and Biodiversity Strategy Applications for approval of Reserved Matters submitted pursuant to this permission relating to appearance and landscaping of the public realm shall be accompanied by a detailed Ecology and Biodiversity Strategy for approval by the Local Planning Authority prior to commencement of that relevant phase. The Ecology and Biodiversity Strategy shall explain:

- The incorporation of bird boxes, bat roosts and other wildlife features on buildings;
- The creation of wildlife habitats within the public realm, integrated into the detailed SUDS designs; and
- The management and arrangements for these features.

REASON: To ensure the development contributes to improving the ecology and biodiversity of the area in accordance with Policy 7.19 of the London Plan (2016), Policy DM O1 of the SPP Local Plan 2014, Policy CS13 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

11. Construction Environmental Management Plan Applications for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by a detailed Construction Environmental Management Plan. This document shall explain:

- The proposed Best Practice Measures to be implemented during construction to suppress dust and minimise noise and vibration associated with demolition / building works;
- A full detailed Noise and Vibration Assessment;
- The measures proposed to reduce and remove risks to the water environment and reduce flood risk during construction;
- A full Construction Logistics Plan, which demonstrates how the impact of construction vehicles would be minimised; and
- Details of proposed hours of work for construction activity.

REASON: To ensure the development contributes to climate change mitigation by meeting the highest standards of sustainable design and construction achieving an adequate reduction in carbon dioxide emissions from on-site renewable generation, in accordance with the principles set out in the Energy Statement and in accordance with Policy 7.15 of the London Plan (2016), Policy DM EP2 & DM EP3 of the SPP Local Plan 2014, Policies CS15 & CS16 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

12. Housing Accommodation Schedule Applications for approval of Reserved Matters submitted pursuant to this permission relating to appearance for each relevant phase of development including if built out as a single phase (other than demolition, enabling and groundworks, shall be accompanied by a. For each subsequent relevant phase of development thereafter, a detailed Housing Accommodation Schedule shall be submitted to and approved in writing prior to commencement of that relevant phase. These documents shall explain and include:

- The type and mix of units proposed;
- Whether the units are to be provided as affordable and what tenure;
- The gross internal floor areas of each dwelling; and
- A cumulative position statement on the provision of housing.

REASON: To ensure the development provides an appropriate mix and quality of housing as well as providing an appropriate amount and mix of affordable housing having regard to the relevant viability assessment in accordance with the NPPF (2012), Policies 3.3, 3.4, 3.7, 3.8, 3.9, 3.11 and 3.12 of the London Plan (2016), Policies DM H2, DM H3 of the SPP Local Plan 2014, Policy CS8 of the Core Planning Strategy 2011 and Policy EP R4 of the Adopted Estates Local Plan 2018

13. Daylight and Sunlight Assessment Applications for approval of Reserved Matters for each relevant phase of development including if built out as a single phase (other than demolition, enabling and groundworks submitted pursuant to this permission relating to layout and scale shall be accompanied by a detailed Daylight and Sunlight Assessment. This document shall explain:

- a) The impact of the proposed development on daylight and sunlight to neighbouring properties;
- b) The impact of the proposed development on daylight and sunlight to properties within the development itself; and

REASON: To ensure the development has an acceptable impact on neighbouring residents and future occupiers in terms of daylight and sunlight in line with the recommendations set out in the Daylight and Sunlight Report in accordance with Policy 7.7 of the London Plan (2016), Policy DM D2 of the SPP Local Plan 2014, Policy CS14 of the Core Planning Strategy 2011 and Policy EP R1 of the Adopted Estates Local Plan 2018.

14. Flood Risk Assessment The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment (FRA) by Tully De'Ath Consultants (ref: 11888 Revision 4 dated Feb 2018). The flood risk and drainage mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future users, and ensure flood risk does not increase offsite in accordance with Merton's policies CS16, DM F1 and DMF2 and the London Plan policies 5.12, 5.13. and Policy EP R6 of the Adopted Estates Local Plan 2018.

15. Floodplain Compensation Scheme No development approved by this permission shall be commenced until a detailed site wide level for level, volume for volume, floodplain compensation scheme has been designed and submitted to and approved in writing by the local planning authority, in consultation with the Environment Agency. The development hereby permitted shall not be occupied until such time as a floodplain compensation scheme is implemented for each phase, which ensures that the flood risk is not increased onsite and elsewhere, both during and post construction of the scheme. The implemented scheme shall include flood openings (voids), taking into consideration flood flows, and these voids must be maintained and remain operational for the lifetime of the development. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

REASON To reduce the risk of river flooding to the proposed development and future users, and ensure flood risk does not increase offsite in accordance with Merton's policies CS16, DM F1 and the London Plan policy 5.12. and Policy EP R6 of the Adopted Estates Local Plan 2018.

16. Finished floor levels Prior to commencement of the development hereby permitted by this planning permission, details shall be submitted to the approval of the local planning to demonstrate that finished floor levels for all residential units shall be set no lower than 300mm above the 1 in 100 year plus climate change flood level (in metres above Ordnance Datum) as detailed in Section 5.3 of the submitted Flood Risk Assessment. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme or within any other period as may subsequently be agreed, in writing, by the local planning authority.

REASON: To reduce the risk of flooding to the proposed development and future users in accordance with Merton's Core Planning Strategy (2011) CS16, SPP (2014) DM F1 and the London Plan policy 5.12

17. Surface Water drainage strategy Applications for approval of Reserved Matters submitted pursuant to this permission relating to landscaping shall be accompanied by an overarching Surface Water Drainage Strategy for all phases. For each subsequent relevant phase of development thereafter, a detailed Surface Water Drainage Strategy shall be submitted to the Local Planning Authority for approval prior to commencement of that relevant phase. These documents shall explain:

- a) The proposed use of Sustainable Urban Drainage Systems (SUDS) to manage surface water run-off;
- b) Surface water attenuation, storage and disposal works, including relevant calculations; and
- c) Works for the disposal of sewage associated with the development.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk, in accordance with Policies 5.12 and 5.13 of the London Plan (2016), Policy Policies DM F1, DM F2 of the SPP Local Plan 2014, Policy CS5 & CS16 of the Core Planning Strategy 2011 and Policies EP R1 and EP R6 of the Adopted Estates Local Plan 2018.

18. Water contamination Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- a) A site investigation scheme, based on the 'Ground Conditions Assessment, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- b) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- c) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

REASON: For the protection of Controlled Waters. The site is located over a Secondary Aquifer and close the River Wandle and it is possible that the site may be affected by unexpected contamination. This is in accordance with Policy 5.21 of the London Plan (2016), Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

19. Water contamination remediation strategy: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

REASON: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters. This is in accordance with Policy 5.21 of the London Plan (2016), Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

20. Water contamination remediation verification Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

REASON: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use. This is in accordance with Policy 5.21 of the London Plan (2016), Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

21. Preventing groundwater pollution Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Environment Agency

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REASON: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater. This is in accordance with Policy 5.21 of the London Plan (2016), Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

22. Piling and preventing contamination Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

REASON: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters. This is in accordance with Policy 5.21 of the London Plan (2016), Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

23. Accessibility Strategy Applications for approval of Reserved Matters for each relevant phase of the development including if built out as a single phase (other than demolition, enabling and groundworks shall be submitted pursuant to this permission relating appearance and landscaping shall be accompanied by a detailed Accessibility Strategy for the relevant phase. This document shall explain:

- a) How the proposed public realm areas, within each relevant phase, would be accessible to all, including details of finished site levels, surface gradients and lighting;
- b) How each building would be accessible to all, including details of level access and internal accommodation arrangements and access to car parking; and
- c) That 10% of the overall residential dwellings hereby permitted would meet Building Regulation M 4(3).

REASON: To ensure the development is accessible and inclusive to all in accordance with Policy 7.2 of the London Plan (2016), Policy DM D2 of the SPP Local Plan 2014, Policy CS14 of the Core Planning Strategy 2011 and Policies EP R2, EP R3, EP R4 of the Adopted Estates Local Plan 2018.

24. Lighting Strategy Applications for approval of Reserved Matters submitted pursuant to this permission relating to appearance and landscaping shall be accompanied by an overarching Lighting Strategy in line with the Code of Practice for the Reduction of Light Pollution issued by the Institute of Lighting Engineers for all phases. For each subsequent relevant phase of development thereafter, an

updated detailed Lighting Strategy shall be submitted to and approved in writing prior to commencement of that relevant phase. These documents shall explain:

- a) The lighting proposed for amenity spaces and external communal areas, including relevant justification; and
- b) The proposed external building lighting.

REASON: To ensure the development is adequately lit in order to minimise the risk and fear of crime, whilst ensuring that the proposed lighting would not unduly impact on local character, amenity or biodiversity in accordance with Policies 7.3 and 7.19 of the London Plan (2016), Policy DM D2 of the SPP Local Plan 2014, Policy CS14 of the Core Planning Strategy 2011.

25. Refuse Strategy Applications for approval of Reserved Matters submitted pursuant to this permission relating to appearance and landscaping shall be accompanied by an overarching Refuse Strategy for all phases including if built out as a single phase (other than demolition, enabling and groundworks. For each subsequent relevant phase of development thereafter, an updated detailed Refuse Strategy shall be submitted to and approved in writing prior to commencement of that relevant phase. These documents shall explain:

- a) The storage and disposal arrangements for refuse and waste associated with the residential and commercial elements of the proposed development, including vehicular access thereto;
- b) The storage and disposal arrangements for refuse and waste associated with proposed public realm areas, including vehicular access thereto;
- c) The hours of proposed waste collection; and
- d) The proposed Waste Management Plan for public realm areas.
- e)

REASON: To ensure that adequate refuse storage and disposal facilities are provided, in the interests of local character and amenity in accordance with Policy 5.16 of the London Plan (2016), Policies DM D1, DM D2 of the SPP Local Plan 2014, Policy CS2 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

26. Arboricultural Impact Assessment Applications for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by an overarching Arboricultural Impact Assessment for all phases. For each subsequent relevant phase of development thereafter, an updated detailed Arboriculture Impact Assessment shall be submitted to and approved in writing prior to commencement of that relevant phase. These documents shall explain how trees are to be retained, together with measures for their protection during the course of the development. If any trees are to be removed, lopped or topped, a full justification must be provided within the Arboriculture Report. This document shall also explain the total number of

trees to be removed, together with details of proposed replacement tree planting, to ensure an overall increase in the number of trees across the site.

REASON: To safeguard the character and appearance of the area and to enhance the appearance of the development, in accordance with Policy 7.5 of the London Plan (2016), Policy DM O2 of the SPP Local Plan 2014, Policy CS13 of the Core Planning Strategy 2011 and Policy EP R7 of the Adopted Estates Local Plan 2018.

27. Transport Strategy Applications for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by a detailed Transport Strategy for the relevant phase. This document shall explain:

- a) A detailed Parking Management Strategy for that part of the development (including Car Club provision);
- b) Details of cycle parking provision for each of the proposed uses;
- c) Details of electric car charging points with 20% active and 20% passive provision;
- d) Details of pickup and drop off facilities for the school (in applications relating to the primary school only);
- e) Details of motorcycle and scooter parking;
- f) Details of pedestrian and cycle routes throughout that part of the scheme;
- g) Details of pedestrian and vehicle signage and way-finding within the development;
- h) Details of enforcement procedures for parking offences on un-adopted roads;
- i) A summary of how the approach relates to the original Transport Assessment; and
- j) A summary of how the proposed Strategy relates to the Travel Plan to be submitted under the s106 Agreement.

REASON: To ensure that adequate levels of parking are proposed, that sustainable means of transport are encouraged and to ensure that no unacceptable increase in traffic movements result, in line with the recommendations of the Transport Assessment and in accordance with Policies 6.3, 6.9 and 6.13 of the London Plan, Policies DM T1, DM T2 & DM D3 of the SPP Local Plan 2014, Policy CS18, CS19 & CS20 of the Core Planning Strategy 2011 and Policies EP R2 & EP R3 of the Adopted Estates Local Plan 2018.

28. Levels Applications for approval of Reserved Matters for each relevant phase of the development submitted pursuant to this permission shall be accompanied by a detailed Levels Plan for the relevant phase. This document shall explain details of the levels of the buildings, roads and footpaths in relation to the adjoining land and highway(s), and any other changes proposed in the levels of the site.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and land contamination, in accordance with Policy 5.21 of the London Plan (2016), Policies CS 14 of Merton's Core Planning Strategy 2011, and policies R.1, R2 R3 and R4 of Merton's Estates Local Plan 2018

29. a) **A land contamination investigation and risk assessment**, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

b) Site Investigation for Contaminated Land

Subject to the site investigation for contaminated land, if necessary, a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

c) Remediation

Any approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development, unless otherwise agreed in writing by the Local Planning Authority. Following the completion of any measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

d) Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11' and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the Local Planning Authority.

e) Verification

Where required, the contamination shall be fully treated and completed wholly in accordance with the approved measures in the remediation strategy. A verification report (that demonstrates the effectiveness of the remediation carried out) must be submitted to and approved in writing by the Local Planning Authority before the development is occupied or brought into use in accordance with the approved Phasing Strategy.

REASON: In the interests of future health of occupiers of the development and to protect pollution of groundwater, in accordance with Policy 5.21 of the London Plan (2016), Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

30. Demolition and construction method statement No development shall take place until a detailed Demolition and Construction Method Statement has been submitted for each of the phases of the development, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the demolition and construction period.

The Statement shall provide for:

- hours of operation
- the parking of vehicles of site operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials used in constructing the development -the erection and maintenance of security hoarding including decorative - displays and facilities for
- public viewing, where appropriate
- wheel washing facilities
- measures to control the emission of noise and vibration during construction.
- measures to control the emission of dust and dirt during construction/demolition
- a scheme for recycling/disposing of waste resulting from demolition and construction.

REASON: In the interests of future health of occupiers of the development and to protect pollution of groundwater, in accordance with Policy 5.21 of the London Plan (2016), Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

31. Carbon reduction statement Prior to commencement of any superstructure works for any phase of the development, a report demonstrating how the scheme reduces the carbon dioxide emissions of the development by at least 35% compared to the 2013 Building Regulations, shall be submitted to and approved in writing by the Local Planning Authority. The report shall reference the measures set out in the Energy Statement accompanying the planning application, but shall explain what measures have been implemented in the construction of the development. The development and energy efficiency measures shall thereafter be retained.

REASON: In the interests of the sustainability and energy efficiency of the development and to meet the requirements of Policy 5.2 of the London Plan (2016), Policies DM EP1 & DM EP3 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy RP E6 of the Adopted Estates Local Plan 2018.

32. Water Conservation Prior to the commencement of the relevant phase of the development, a scheme detailing measures to reduce water use within the development, to meet a target water use of 105 litres or less per person, per day for residential dwellings only shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved scheme and thereafter retained.

REASON: To minimise the water use of the development, in accordance with Policy 5.15 of the London Plan (2016), Policy DM D2 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

33. Overheating Strategy Prior to commencement of the relevant phase of the development hereby permitted, details for the provision of an Overheating Strategy for the relevant phase shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure the development is sustainable and to comply with Policy 5.3 of the London Plan (2016), Policies DM EP1 & DM EP3 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

34. Open Space Strategy Prior to the commencement of the relevant phase of the development hereby permitted, a detailed Open Space Strategy for the provision of open space within that phase shall be submitted to and approved in writing by the Local Planning Authority. The proposed open space, where it would not form part of the permanent areas of public realm, shall be accompanied by full details of the proposed approach to the landscaping, including planting plans, a schedule of plants, including plant sizes and proposed numbers, as well as details of hard landscape materials, boundary treatments, street furniture and play space for all ages within the public and private areas. The development shall be carried out in accordance with the Open Space Strategy prior to first occupation of any part of that relevant phase of the development and thereafter retained and maintained.

REASON: To ensure adequate provision of open space within the development, in accordance with Policy 7.5 of the London Plan (2016), Policies DM O1, DM D1 & DM D2 of the SPP Local Plan 2014, Policies CS2, CS5, CS13 & CS14 of the Core Planning Strategy 2011 and Policy EP R5 of the Adopted Estates Local Plan 2018.

35. Public Realm Management Plan Prior to first occupation of any phase of the development hereby permitted, a Public Realm Management Plan shall be submitted to and approved in writing by the Local Planning Authority for that phase of development. This document shall include:

- a.) Details of the contractual arrangement between the developer and the management company;
- b.) Details of a scheme for waste management in the public realm;
- c.) Details of proposals for landscape management in the public realm including long term objectives, responsibilities and maintenance schedules for all public realm areas; and
- d.) A Maintenance and Management Plan for the non-adopted drains and SUDs systems. The Public Realm Management Plan shall be implemented as approved.

REASON: To ensure that the public realm within the development is maintained to an adequate standard, to safeguard the character and appearance of the area and to enhance the appearance of the development, in accordance with Policy 7.5 of the London Plan (2016), Policies DM O1, DM D1 & DM D2 of the SPP Local Plan 2014, Policies CS2, CS5, CS13 & CS14 of the Core Planning Strategy 2011 and Policy EP R5 of the Adopted Estates Local Plan 2018.

36. Landscaping and planting scheme No development shall take place within each phase until full details of a landscaping and planting scheme relevant to each phase has been submitted to and approved in writing by the LPA. The details shall include on a plan, full details of the size, species, quantities and location of the proposed plants. The approved works shall be carried out in the first available planting season following the development or prior to the occupation of any part of the development, whichever is the sooner, and any trees which die within a period of 5 years from the completion of the development, are removed or become seriously damaged or diseased or are dying, shall be replaced in the next planting season with others of the same approved specification, unless the LPA gives written consent to any variation.

REASON: To ensure the protection of wildlife and the habitat which supports it and secure opportunities for the enhancement of the nature conservation value of the site in accordance with Policy 7.5 of the London Plan (2016), Policies DM O1, DM D1 & DM D2 of the SPP Local Plan 2014, Policies CS2, CS5, CS13 & CS14 of the Core Planning Strategy 2011 and Policy EP R5 of the Adopted Estates Local Plan 2018.

37. Timing of deliveries Deliveries to and from the site for the non-residential uses hereby permitted shall only take place between 07.00hrs to 22.00hrs on any day unless for health and safety or road access reasons, in which case deliveries shall take place outside these hours with prior agreement with the Local Planning Authority.

REASON: To ensure the future occupiers of the residential units in the development would not experience undue noise and disturbance from deliveries in accordance with Policy 7.15 of the London Plan (2016), Policies DM D2 & DM EP2 of the SPP Local Plan 2014, Policies CS14 & CS15 of the Core Planning Strategy 2011 and Policies EP R1 & EP R6 of the Adopted Estates Local Plan 2018.

38. Noise and Vibration Mitigation Strategy during construction Applications for approval of Reserved Matters for each relevant phase of the development including if built out as a single phase (other than demolition, enabling and groundworks submitted pursuant to this permission shall be accompanied by a detailed Noise and Vibration Mitigation Strategy for the relevant phase. This document shall explain noise attenuation measures for the proposed uses, including noise barriers, specified glazing and ventilation and orientation / layout of buildings and amenity areas. Post completion Noise Assessments are to be submitted to and approved in writing by the Local Planning Authority prior to first occupation of that relevant building.

REASON: To ensure the future occupiers of the residential units in the development would not experience undue noise and disturbance from deliveries in accordance with Policy 7.15 of the London Plan (2016), Policies DM D2 & DM EP2 of the SPP Local Plan 2014, Policies CS14 & CS15 of the Core Planning Strategy 2011 and Policies EP R1 & EP R6 of the Adopted Estates Local Plan 2018.

39. Noise levels, (expressed as the equivalent continuous sound level) LAeq (10 minutes), from any new plant/machinery from the community use shall not exceed LA90-10dB at the boundary with the closest residential property.

REASON: To protect the living conditions and amenity of future / new residents of the proposed development from noise attributed to the associated commercial units below in accordance with Policies DM C1 & DM EP2 of the SPP Local Plan 2014, Policies CS11 & CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

40. Community Centre hours of operation. The community centre shall operate only between the hours of 08:00am and 10pm Monday to Sunday unless otherwise approved in writing by the local planning authority.

REASON: To protect the living conditions and amenity of future / new residents of the proposed development from noise attributed to the associated commercial units below in accordance with Policies DM C1 & DM EP2 of the SPP Local Plan 2014, Policies CS11 & CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

41. Acoustics Prior to commencement of each phase of development, a scheme of sound insulation shall be submitted to and approved in writing by the Local Planning Authority for that relevant phase hereby permitted. Within the proposed residential unit (with the windows closed) the following internal noise levels shall be achieved; 35dB(A) Leq 16 hours 07.00hrs-23.00hrs in living rooms, while 30dB(A) Leq 8 hours in bedrooms and no individual noise event to exceed 45dB(A) max (measured with F time weighting) 23.00hrs-07.00hrs.

REASON: To protect the living conditions of future residents on and around the application site in accordance with Policy 7.15 of the London Plan (2016), Policies DM D2, DM EP2, DM E1 & DM E3 of the SPP Local Plan 2014, Policies CS14 & CS15 of the Core Planning Strategy 2011 and Policies EP R1 & EP R6 of the Adopted Estates Local Plan 2018.

42. Light spillage There shall be no light spill from external artificial lighting into the watercourse or adjacent river corridor habitat. To achieve this, the specifications, location and direction of external artificial lights should be such that the lighting levels within 8m of the top of the bank of the watercourse are maintained at background levels. The Environment Agency considers background levels to be a lux level of 0-2.

REASON: To ensure the development is adequately lit in order to minimise the risk and fear of crime, whilst ensuring that the proposed lighting would not unduly impact on local character, amenity or biodiversity in accordance with Policies 7.3 and 7.19 of the London Plan (2016), Policy DM D2 of the SPP Local Plan 2014, Policy CS14 of the Core Planning Strategy 2011.

43. Flood Risk Assessment The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment (FRA) by Tully De'Ath Consultants (ref: 11888 Revision 4 dated Feb 2018). The flood risk and drainage mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

REASON: To reduce the risk of flooding to the proposed development and future users, and ensure flood risk does not increase offsite in accordance with Merton's policies CS16, DM F1 and DMF2 and the London Plan policies 5.12, 5.13.

44. Floodplain compensation scheme No development approved by this permission shall be commenced until a detailed site wide level for level, volume for volume, floodplain compensation scheme has been designed and submitted to and approved in writing by the local planning authority, in consultation with the Environment Agency. The development hereby permitted shall not be occupied until such time as a floodplain compensation scheme is implemented for each phase, which ensures that the flood risk is not increased onsite and elsewhere, both during and post construction of the scheme. The implemented scheme shall include flood openings (voids), taking into consideration flood flows, and these voids must be maintained and remain operational for the lifetime of the development. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

REASON: To reduce the risk of river flooding to the proposed development and future users, and ensure flood risk does not increase offsite in accordance with Merton's policies CS16, DM F1 and the London Plan policy 5.12.

45. Finished floor levels Prior to commencement of the development hereby permitted by this planning permission, details shall be submitted to the approval of the local planning to demonstrate that finished floor levels for all residential units shall be set no lower than 300mm above the 1 in 100 year plus climate change flood level (in metres above Ordnance Datum) as detailed in Section 5.3 of the submitted Flood Risk Assessment. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within

the scheme or within any other period as may subsequently be agreed, in writing, by the local planning authority.

REASON: To reduce the risk of flooding to the proposed development and future users in accordance with Merton's policies CS16, DM F1 and the London Plan policy 5.12.

46. Risks associated with contamination Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

A site investigation scheme, based on the 'Ground Conditions Assessment, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

2) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

REASON: For the protection of Controlled Waters. The site is located over a Secondary Aquifer and close the River Wandle and it is possible that the site may be affected by unexpected contamination.

47. Remediation strategy If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

REASON: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

48. Verification plan for remediation Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It

shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

REASON: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

49. Sustainable drainage schemes Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

REASON: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

50. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

REASON: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

DEMOLITION

51. Ecology and demolition No demolition of buildings or removal of trees or shrubs shall take place in any phase of development hereby permitted until up to date bat and breeding bird surveys are submitted to and approved in writing by the Local Planning Authority for that phase of development. If evidence of bat or breeding birds are found prior to demolition, specific mitigation measures should be included in any submission for the written approval of the Local Planning Authority. Development shall proceed in accordance with any approved mitigation measures.

REASON: To safeguard the ecology and biodiversity of the area, in accordance with Policy 7.19 of the London Plan (2016), Policies DM EP2 & DM EP3 of the SPP Local

Plan 2014, Policies CS15 & CS16 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

PERMITTED DEVELOPMENT RESTRICTED

52. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), no development which would otherwise fall within Classes A, B, C, D, E and F in Part 1 of Schedule 2 to that Order shall be carried out to the proposed houses without the prior written permission of the Local Planning Authority.

REASON: To safeguard the character of the area by restricting the amount of site coverage and size of dwelling and to safeguard the amenity of neighbouring residents in accordance with Policy DM D2 of the SPP Local Plan 2014, Policy CS14 of the Core Planning Strategy 2011 and Policies EP R1 & EP R8 of the Adopted Estates Local Plan 2018.

53. **Secured by Design** Prior to the commencement of the relevant phase of development (other than demolition and enabling works), details of measures for that phase of development, to minimise the risk of crime in a visually acceptable manner and meet the specific security needs of the application site/development (as informed by the principles of Secured by Design), shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be fully implemented and thereafter maintained unless otherwise agreed in writing by the Local Planning Authority.

REASON: In the interest of creating safer, sustainable communities, in compliance with Policy DM D2 of the SPP Local Plan 2014, Policy CS14 of the Core Planning Strategy 2011 and Policies EP R1, EP R2, EP R3, EP R4 & EP R8 of the Adopted Estates Local Plan 2018.

54. **Archaeology** No demolition or development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority. B) No demolition or development shall take place other than in accordance with the Written Scheme of Investigation approved under Part A). C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

REASON: In the interests of archaeological protection in accordance with Policies DM D2 & DM D4 of the SPP Local Plan 2014, Policies CS2 & CS14 of the Core Planning Strategy 2011 and Policies EP R1 & EP R8 of the Adopted Estates Local Plan 2018.

AIR QUALITY

55. Air quality assessment Prior to commencement of development, a detailed Air Quality Assessment Report, written in accordance with the relevant current guidance, for the existing site and proposed development shall be submitted to and approved by the Local Planning Authority. The development shall be at least 'Air Quality Neutral' and an air quality neutral assessment for both buildings and transport shall be included in the report to demonstrate this.

REASON: To ensure that the amenities of occupiers and neighbouring amenities are protected from the poor air quality in the vicinity in accordance with Policy 7.14 of the London Plan (2016) and Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

56. Air pollution mitigation measures scheme Prior to commencement of development, a scheme for air pollution mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The approved mitigation scheme shall be implemented in its entirety in accordance with details approved under this condition before any of the development is first occupied or the use commences and retained as such thereafter

REASON: To ensure that the amenities of occupiers and neighbouring amenities are protected from the poor air quality in the vicinity in accordance with Policy 7.14 of the London Plan (2016) and Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

57. Control of dust and emissions during construction and demolition All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>

REASON: To protect local air quality in accordance with Policy 7.14 of the London Plan (2016) and Policy DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

58. Non-Road Mobile Machinery (NRMM) An inventory of all NRMM must be kept on-site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept onsite for inspection. Records should be kept on-site, which details proof of emission limits for all equipment. This documentation should be made available to Local Authority officers as required until completion of development.

REASON: To protect local air quality in accordance with Policy 7.14 of the London Plan (2016) and Policies DM EP2, DM EP3 & DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

59. Air Quality Demolition Management Plan (Prior to any works commencing on site, an Air Quality Demolition Management Plan (AQDMP) shall be submitted to and approved in writing by the Local Planning Authority. The AQDMP shall identify the steps and procedures that will be implemented to minimise the creation and impact of dust and other air emissions resulting from the site preparation, demolition, and groundwork and construction phases of the development.

REASON: To protect local air quality in accordance with Policy 7.14 of the London Plan (2016) and Policies DM EP2, DM EP3 & DM EP4 of the SPP Local Plan 2014, Policy CS15 of the Core Planning Strategy 2011 and Policy EP R6 of the Adopted Estates Local Plan 2018.

Informatives

1. **LBM Policies and Guidance** To assist applicants the Local Planning Authority has produced policies and written guidance, all of which is available on the Council's website and which offers a pre-planning application advice service.

2. **Construction and demolition works** audible beyond the boundary of the site should only be carried out between the hours of 0800 and 1800 hours Mondays to Fridays and 0800 and 1300 hours on Saturdays, and not at all on Sundays or Public/Bank Holidays.

3. **A Trade Effluent Consent** will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc., may be required before the Company can give its consent. Applications should be made at <http://www.thameswater.co.uk/business/9993.htm> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

4. **CIL** The application is subject to both the Mayoral and the Merton Council Community Infrastructure Levy unless an application for an exemption is made and approved.

5. **Tree works** If the intention is to complete tree work between the 1st March & the 31st July (inclusive) a due diligence check for nesting birds must be completed before work starts in order to comply with the Wildlife & Countryside Act 1981.

Arborists should record such checks in their site specific Risk assessment. If active nests are found work should not take place until the young have fledged.

6. A due diligence check for bats and likely habitats (see attached link) must be completed before work starts in order to comply with the Wildlife & Countryside Act 1981. Arborists should carry out and record such checks in line with BS8596: 2015 surveying for bats in trees and woodland in their site specific risk assessment. If bats or potential roosting features are found work must not start until an appropriately licenced bat handler has been engaged.

7. The developer should consult with Thames Water with regard to whether any offsite reinforcement of the foul water drainage network is required. Copies of the correspondence should be provided for the Council records.

8. Surface Water Drainage: It is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Thames Water will aim to provide customers with a minimum pressure of 10m head (approximately 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development We recommend that developers should: Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297401/s_cho0804bibr-e-e.pdf

Refer to the Environment Agency Guiding Principles for Land Contamination for the Type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.

<https://www.gov.uk/government/publications/managing-and-reducinglandcontamination>

Refer to our website at www.environment-agency.gov.uk for more information. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. E.g. British Standards when investigating potentially contaminated sites and groundwater, and references with these documents:

- BS5930:2015 Code of practice for site investigations;
- BS 10175:2011+A1:2013 Code of practice for investigation of potentially contaminated sites;
- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and End 5 installation of groundwater monitoring points;
- BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)
- Use MCERTS accredited methods for testing contaminated soils at the site. A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out.
- In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.
- GP3 version 1.1 August 2013 provided further guidance on setting compliance points in DQRAs.
- Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m. Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with CRL11. The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works. E.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period.) 8. If approved it is the developer's responsibility to ensure all signage associated with the proposed development i.e. street nameplates, building names and door numbers are erected prior to occupation, as agreed with the Councils Street Naming/Numbering Officer.

9. **Asbestos** In the event that asbestos containing materials (ACMs) are discovered, details of the contractors with their plan of work detailing the method of removal of ACMs in compliance with current legislation shall be submitted to the HSE.

10. **Written schemes of investigation** will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

11. **Demolition of buildings** and tree felling should avoid the bird nesting and bat roosting seasons. Anyone who takes, damages or destroys the nest of any wild bird whilst that nest is in use, or who kills, injures or disturbs bats, obstructs access to bat roosts or damages or disturbs bat roosts, even when unoccupied by bats, is guilty of an offence under the Wildlife and Countryside Act 1981. Buildings and trees should be inspected for bird nests and bat roosts prior to demolition or felling by an appropriately qualified person. If bats are found, Natural England should be contacted for advice.

12. Flood Risk Activity Permit (FRAP) Under the Environmental Permitting (England and Wales) Regulations 2016, you must submit plans to the Environment Agency and apply for a FRAP if you want to do work:

- In, over or under a main river
- Within 8m of the top of bank of a main river

Flood risk activities can be classified as: Exclusions, Exemptions, Standard Rules or Bespoke. These are associated with the level of risk your proposed works may pose to people, property and the environment. You should apply for a Bespoke FRAP if your work cannot be classified as one of the following: an excluded activity (listed here) an 'exempt' activity (listed here) a 'standard rules' activity (listed here)

[Click here](#) for full plans and documents related to this application.

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