

PLANNING APPLICATIONS COMMITTEE
16th July 2020

<u>UPRN</u>	<u>APPLICATION NO.</u>	<u>Item No:</u> <u>DATE VALID</u>
	19/P4048	11/12/2019
Site Address:	Car Park Raleigh Gardens Mitcham	
Ward:	Cricket Green	
Proposal:	REDEVELOPMENT OF EXISTING CAR PARK TO ALLOW FOR THE ERECTION OF A PART FIVE, PART SIX STOREY DEVELOPMENT COMPRISING 36 SELF-CONTAINED UNITS (29X 1B AND 7X 2B); WITH ASSOCIATED CYCLE PARKING, REFUSE STORE, 3X DISABLED PARKING BAYS AND LANDSCAPING.	
Drawing No.'s:	MRT-WWP-RG-XX-DR-A-00001 (Site Location Plan); MRT-WWP-RG-XX-DR-A-00002 (Existing Site Plan); MRT-WWP-RG-ZZ-DR-A-02500 (Existing Context Elevations); MRT-WWP-RG-XX-DR-A-10000 Rev 0.1 (Proposed Site Plan)_Amended 06.07.20; MRT-WWP-RG-00-DR-A-11000 Rev 0.1 (Ground Floor Plan - As Proposed)_Amended 06.07.20; MRT-WWP-RG-01-DR-A-11001 Rev 0.1 (First Floor Plan - As Proposed)_Amended 06.07.20; MRT-WWP-RG-02-DR-A-11002 Rev 0.1 (Second Floor Plan - As Proposed)_Amended 06.07.20; MRT-WWP-RG-03-DR-A-11003 Rev 0.1 (Third Floor Plan - As Proposed)_Amended 06.07.20; MRT-WWP-RG-04-DR-A-11004 Rev 0.1 (Fourth Floor Plan - As Proposed)_Amended 06.07.20; MRT-WWP-RG-05-DR-A-11005 Rev 0.1 (Fifth Floor Plan - As Proposed)_Amended 06.07.20; MRT-WWP-RG-R1-DR-A-11006 Rev 0.1 (Roof Plan - As Proposed)_Amended 06.07.20; MRT-WWP-RG-00-DR-A-12000 Rev 0.1 (Block A - Ground Floor Flat Layouts)_Amended 06.07.20; MRT-WWP-RG-00-DR-A-12001 Rev 0.1 (Block B - Ground Floor Flat Layouts)_Amended 06.07.20; MRT-WWP-RG-01-DR-A-12002 Rev 0.1 (Block A - First to Fourth Floor Flat Layouts)_Amended 06.07.20; MRT-WWP-RG-01-DR-A-12003 Rev 0.1 (Block B - First to Fourth Floor Flat Layouts)_Amended 06.07.20; MRT-WWP-RG-05-DR-A-12005 Rev 0.1 (Block B - Fifth Floor Flat Layouts)_Amended 06.07.20; MRT-WWP-RG-ZZ-DR-A-20000 Rev 0.1 (Section A)_Amended 06.07.20; MRT-WWP-RG-ZZ-DR-A-20001 (Section B)_Amended 06.07.20; MRT-WWP-RG-ZZ-DR-A-20002 Rev 0.1 (Section C)_Amended 06.07.20; MRT-WWP-RG-ZZ-DR-A-21000 Rev 0.1 (Proposed Context Elevations)_Amended 06.07.20; MRT-WWP-RG-ZZ-DR-A-21001 Rev 0.1 (Proposed Elevations - North)_Amended 06.07.20; MRT-WWP-RG-ZZ-DR-A-21002 Rev 0.1 (Proposed Elevations - South)_Amended 06.07.20; MRT-WWP-RG-ZZ-DR-A-21003 Rev 0.1 (Proposed Elevations - East)_Amended	

06.07.20; MRT-WWP-RG-ZZ-DR-A-21004 Rev 0.1 (Proposed Elevations - West)_ Amended 06.07.20.
ExA_1930_RG_101 Rev D (General Arrangement Plan); ExA_1930_RG_110 Rev C (Tree Retain and Remove Plan); ExA_1930_RG_201 Rev C (Planting Plan).

Documents:

Design and Access Statement (Issue 03) 31/09/19; Design and Access Statement Addendum 21/05/20; Daylight and Sunlight Assessment 16/10/2019
(ref: AWH_REL06V1_21971_D/S/O_Raleigh Gardens Carpark); Internal Daylight and Sunlight Assessment 16/10/2019 (ref: AWH_21971_REL07V4_D/S/O_Raleigh Gardens Carpark); Landscape Planning Statement 16/08/2019 (ref: ExA_1930_RG_Planning_Statement Rev C); Preliminary ecological appraisal, bat roost assessment and tree survey v2 (16/08/2019); Raleigh Gardens Transport Statement Rev 3.0 (25/07/2019); Development Viability Report (30/10/2019).

Contact Officer: Catarina Cheung (020 8545 4747)

RECOMMENDATION

Grant Planning Permission subject to the completion of any enabling agreement and conditions.

CHECKLIST INFORMATION

- Is a screening opinion required: No
- Is an Environmental Statement required: No
- Has an Environmental Statement been submitted: No
- Press notice: Yes
- Design Review Panel consulted: Reviewed by DRP during pre-application stage, but not for the main application
- Number of neighbours consulted: 148
- Controlled Parking Zone: No, but adjacent to Zones MTC1 and MTC
- Archaeological Zone: Yes, Tier 2
- Conservation Area: No, but adjoins Mitcham Cricket Green along the southern boundary
- Listed Building: No
- Trees: None on the site

1. INTRODUCTION

- 1.1 The application is being brought to the Planning Applications Committee for determination due to the nature and number of objections received.

2. SITE AND SURROUNDINGS

- 2.1 The application site (approximately 1340sqm), Raleigh Gardens Car Park, is sited on the southern side of Raleigh Gardens in Mitcham. It is a Council operated car park located within Mitcham Town Centre. The site is walking distance from Mitcham High Street and the designated primary shopping areas.
- 2.2 The site has one vehicle access point (entrance and exit) located from Raleigh Gardens as well as separate pedestrian access from Raleigh Gardens, in the north-east corner of the site.
- 2.3 Toward the rear (south) of the site is Glebe Court (a private residential estate) which is of 4-5 storeys. Toward the side (east) of the site is Standor House and Deseret House, both four storey in height. It is noted the neighbouring 2 eastern blocks have been granted permission to erect an additional of two storeys each (Standor House, 17/P3923 and Deseret House, 17/P3384), which would increase their building height to 6 storeys.
- 2.4 The site does not lie within a Conservation Area, but along the northern boundary adjoins Mitcham Cricket Green Conservation Area. Within the adjacent site, Glebe Court, lies a number of trees (7, comprising ash trees, a silver birch and cypresses).
- 2.5 The site does not contain a Listed building, nor in close proximity to heritage assets, but is within an Archaeological Priority Zone (Tier 2).
- 2.6 The site has a PTAL rating of 4 (measured on a scale of 0 to 6b, 0 being the worst), adjacent are Controlled Parking Zones MTC and MTC1.
- 2.7 The Car Park at Raleigh Gardens is identified in Merton's Local Plan 2020 (currently under review following Stage 2 consultation held between 31 October 2018 and 28 January 2019) as an 'opportunity' site for development – 'Site Mi11', and the Council's proposed site allocation is residential (C3) use.

3. CURRENT PROPOSAL

- 3.1 The proposed seeks to erect a 5-6 storey residential development on the car park providing 36 units (30 x1bed units and 6x 2beds units).
- 3.2 Main entrance to the development is from Raleigh Gardens. The 2 accessible units (Unit 2 and 3) toward the front of the development would have private accesses, also from Raleigh Gardens.
- 3.3 Two off-street disabled parking spaces are provided toward eastern end of the site, and one off-street disabled parking space at the rear of the development, toward the south-western corner of the site.
- 3.4 Refuse and cycle storage would be located within the footprint of the building on the ground floor, refuse store toward the rear of the building and cycle store toward the front.
- 3.5 The 5 storey building would have a height of 16.9m, depth of 16m and width of 18.1m. The 6 storey building would have a height of 19.9m, depth of 15.7m and width of 18.1m. The building would be externally finished in red brickwork, with bronze metal work for the windows, doors and balustrades.

3.6 The proposed dwelling mix would be as follows:

	Level	Type	Storeys	Proposed GIA (sqm)	Proposed amenity (sqm)
Unit 1	Ground	2b4p (wheelchair accessible unit)	1	85	30
Unit 2	Ground	1b2p (wheelchair accessible unit)	1	61	64
Unit 3	Ground	1b2p (wheelchair accessible unit)	1	65	53
Unit 4	Ground	1b2p	1	53	89
Unit 5	Ground	1b2p	1	50	50
Unit 6	First	1b2p	1	50	5
Unit 7	First	1b2p	1	52	5
Unit 8	First	1b2p	1	52	5
Unit 9	First	1b2p	1	50	5
Unit 10	First	2b4p	1	72	7
Unit 11	First	1b2p	1	52	5
Unit 12	First	1b2p	1	50	5
Unit 13	Second	1b2p	1	50	5
Unit 14	Second	1b2p	1	52	5
Unit 15	Second	1b2p	1	52	5
Unit 16	Second	1b2p	1	50	5
Unit 17	Second	2b4p	1	72	7
Unit 18	Second	1b2p	1	52	5
Unit 19	Second	1b2p	1	50	5
Unit 20	Third	1b2p	1	50	5
Unit 21	Third	1b2p	1	52	5
Unit 22	Third	1b2p	1	52	5
Unit 23	Third	1b2p	1	50	5
Unit 24	Third	2b4p	1	72	7
Unit 25	Third	1b2p	1	52	5
Unit 26	Third	1b2p	1	50	5
Unit 27	Fourth	1b2p	1	50	5
Unit 28	Fourth	1b2p	1	52	5
Unit 29	Fourth	1b2p	1	52	5
Unit 30	Fourth	1b2p	1	50	5
Unit 31	Fourth	2b4p	1	72	7
Unit 32	Fourth	1b2p	1	52	5
Unit 33	Fourth	1b2p	1	50	5
Unit 34	Fifth	2b4p	1	72	7
Unit 35	Fifth	1b2p	1	52	5
Unit 36	Fifth	1b2p	1	50	5

3.7 The proposal at Raleigh Gardens consists of 36 new homes, all of which are apartments for the private rental sector (PRS). This site is being brought forward in conjunction with three other development sites in Merton (Farm Road 19/P4046], Elm Nursery [19/P4047] and Development Site at Madeira Road [19/P4050]) by Merantun Developments Ltd, which have a joint affordable housing strategy.

- 3.8 The scheme has also been subject to negotiation and amendment, alterations re-consulted 22/05/2020, the changes include:
- Amendment of the roof, removing the pitched roof form to a flat roof design. The gables did not feel appropriately context inspired, and removal of these has also assisting in reducing unnecessary height. This is further discussed in Section 7.3.
 - Increased glazing to the stair core and alteration of window grouping arrangement, this also further discussed in Section 7.3.
 - Refuse store location, relocated to the rear of the building in order to be collected from Glebe Court rather than Raleigh Gardens. This arrangement has been reviewed by the Council's Waste Services team, and their comments within Sections 5 and 7.7.
 - An amended Arboricultural report has submitted and reviewed by the Council's Tree officer, comments within Section 5 and 7.10.

4. RELEVANT PLANNING HISTORY

- 4.1 00/P1731: DISPLAY OF AN INTERNALLY ILLUMINATED FREE STANDING DISPLAY UNIT – Refused 27/10/2000

Reason - The proposed sign, by reason of its siting, would be an incongruous feature in the street scene, detrimental to the visual amenities of the locality and the character of the Mitcham Town Centre, contrary to Policies EB.28, EB.29, EB.33 and EB.34 of the Adopted Unitary Development Plan (April 1996) and Policies BE.37, BE.38, BE.43 and BE.44 of the Revised Second Deposit Draft Unitary Development Plan (October 2000).

- 4.2 00/P1729: DISPLAY OF AN INTERNALLY ILLUMINATED FREE STANDING DISPLAY UNIT – Refused 27/10/2000

Reason - The proposed sign, by reason of its siting, would be an incongruous feature in the street scene, detrimental to the visual amenities of the locality and the character of the Mitcham Town Centre, contrary to Policies EB.28, EB.29, EB.33 and EB.34 of the Adopted Unitary Development Plan (April 1996) and Policies BE.37, BE.38, BE.43 and BE.44 of the Revised Second Deposit Draft Unitary Development Plan (October 2000).

- 4.3 00/P0412: DISPLAY OF AN INTERNALLY ILLUMINATED ADVERTISEMENT ON A FREE STANDING UNIT – Refused 20/04/2000

Reason - The proposed sign, by reason of its size and siting, would be an incongruous feature in the streetscene, detrimental to the visual amenities of the locality and the character and appearance of the Mitcham Town Centre, contrary to Policies EB.23, EB.29 and EB.33 of the Adopted Unitary Development Plan (April 1996) and Policies BE.37, BE.39, BE.43, and BE.44 of the Revised Deposit Draft Unitary Development Plan (September 1999).

5. CONSULTATION External

- 5.1 Public consultation was undertaken by way of letters sent to 148 neighbouring properties. Major application site and press notices.
- 5.2 21 representations were received to the proposal. 3 comments and 18 objections.
- 5.3 2 comments received by Wimbledon Swift Group and Swift Conservation raising awareness of the building project's potential to include to provide a new nesting site for swifts. 1 comment received by the Merton Green Party regarding affordable housing.

- 5.4 Mitcham Society raised the following concerns:
- Overdevelopment of the site, with an overbearing pitched roof. Use of the unbuilt additional 2 storeys on Standor House is disingenuous. Imbalance in height in relation to Glebe Court;
 - There is no industrial building within the locality which the proposed building claims to historically respond to;
 - The development is squeezed onto the site which allows no amount of mitigation for its height and mass by landscaping;
 - Use of dark brick makes the proposed development appear looming, and does nothing to mitigate its overpowering size, it is an insensitive material for such a large building in this area;
 - Severe impact toward the daylight and sunlight of Glebe Court;
 - Impact of proposed lighting to the neighbouring residents and wildlife;
 - No provision of solar panels.
- 5.5 Mitcham Cricket Green Community & Heritage raised the following concerns:
- Poor community engagement, and considers the conclusion provided in the Statement of Community Involvement to be a fundamental distortion of the truth;
 - The site demands an active frontage that might best be provided by retail uses;
 - Excessive height, bulk and mass;
 - Damages the setting of the Conservation area and harms Glebe Court;
 - Design quality – the proposed building lacks design distinction and its quality does not meet the standards required for such a prominent location and for a building of this scale. No contextual analysis. Support use of brick but the approach lacks detail and craft. Support the intention to break up structure with the provision of 2 buildings and a linking core/circulation space but do not believe this is achieved by the design approach;
 - Support intention to retain and enhance a green buffer around the new development and to strengthen the boundary with Glebe Court, but proposed development would diminish the positive impact of planting by virtue of its height. questions on maintenance of landscaping;
 - Impact on up-lighting for the trees;
 - Viability study should be subject to independent scrutiny;
 - Loss of car parking and increased parking pressure on surrounding streets;
 - Location of car parking space not convenient for access to wheelchair accessible unit;
 - Inadequate information on sustainability.
- 5.6 Other objections are summarised as below:
- Loss of parking, the car park is in constant use for neighbouring flatted blocks and local businesses;
 - Overdevelopment;
 - Loss of light and privacy;
 - Building should have fewer floors and be set further back from the road with a higher provision of green space, especially trees;
 - Consideration of how the development can minimise fly-tipping;
 - Overbearing, oppressive and the use of a very dark red brick;
 - The construction of the building would be very noisy, dirty and cause disruption to the road;
 - Impact on Conservation area;
 - The existing car park experiences flooding and the new building will subside.
- 5.7 A 14 day re-consultation was carried out 22/05/2020, and 18 objections were received.

- 5.8 Mitcham Cricket Green Community & Heritage:
- Initial objection still stands;
 - Amended roof form does not resolve the fundamental problems with the scheme, it remains too large for the site and will overwhelm neighbouring buildings;
 - The changes proposed lack distinction and are not successful in breaking up the structure which will be seen as a whole rather than two separate blocks in the majority of even semi-oblique views from Raleigh Gardens;
 - Impact on trees in the Conservation area;
 - Further information required on the archaeological desk-based assessment.
- 5.9 Objections from the public are summarised as below:
- Overdevelopment;
 - Sited too close to the existing flats at Glebe Court;
 - Removal of pitched roof makes the building look worse;
 - Trees on Glebe Court are in Conservation area, cannot be removed;
 - Loss of light;
 - Height;
 - Loss of car park;
 - Uplighters proposed at the base of trees unacceptable;
 - Does not conserve and enhance the Conservation area;
 - Construction would be noisy and dirty, causing disruption to the main road.
- 5.10 Thames Water – General waste and water comments provided, if the application were minded to be approved a number of informatives have been provided.
- 5.11 Design Review Panel – During the pre-application stage, the schemes were put forward to the Design Review Panel (DRP) twice before submission of the main planning application: 23 April 2019 and 29 October 2019. During the DRP in April, the scheme received an Amber verdict, and at DRP in October, the scheme received an Amber verdict.

The notes from the October meeting:

The Panel felt that this design had improved since the last review, with a number of previously raised issues being taken on board, mostly successfully. Again, the Panel commended the architectural quality with the caveat that this needed to be seen through the planning and construction process to completion.

The design consisted of large volumes and expanses of brick in the same colour. It was therefore very important that a high quality brick was used. There was some suggestion that this needed some relief. The Panel liked the form of the elevations, the two-building elements the window forms and the keeping of as many trees as possible – particularly to the rear.

The clear division between the two parts of the building was more successful but it was felt that the appearance and materiality needed further refinement. The through access here and the rear layout had been improved with respect to security and overlooking and the re-siting of the cycle store was liked, though this did lead to new issues of dead frontage around the main entrance.

Internally the Panel felt that the ground floor layout was not working as well as it should. The wheelchair accessible unit had its bedroom facing the street and this was felt to be poor layout. The communal storage area seemed to be inhibiting a better layout. Where bathrooms faced external walls, opportunity should be taken to insert windows.

The Panel discussed the rear of the building and its proximity to Glebe Court. There was a general feeling that this was a constrained space with little communal value and a somewhat canyon feel. This led to the suggestion of having a lower boundary wall or no wall at all – implying sharing the existing communal space of Glebe Court, although in separate ownership.

This led the Panel to air its main concern regarding this scheme. This was that they felt that the site was over developed. This was reflected in the reiteration of the suggestion of exploring a U or L shaped building form to maximise the amount of communal space to the rear. It was also expressed in the feeling by the Panel that the building was either slightly too tall or, at the very least, the pitched roof was unnecessary. This, the Panel felt, was anomalous and there was little precedent for it in the immediate vicinity. Removing the pitched roof and recessing the top floor was seen as a possible way of addressing this.

The Panel were concerned there were no sectional drawings provided to show the proximity of the building to existing buildings – notably Glebe Court. It was felt that the roof form did not future-proof for PV panels as they were facing the wrong way. Although there had been some positive developments, a few more fundamental issues still needed to be resolved.

Verdict: AMBER

Internal

- 5.12 Tree officer – All the trees within the car park are proposed for removal with the development, this amounts to 16 trees, 7 of which have been graded as 'B' category trees. 17 new trees are proposed, only 6 will be in prominent positions facing the street.
- 5.13 Ecology – The site has the following Local Plan environmental site designation, the policies of which should be considered for this application:
- Wandle Valley Regional Park 400m Buffer (Policy CS5, CS13, CS para 21.13, DM01).

The findings and recommendations set out in the PEA seem reasonable and should be incorporated as relevant planning conditions, to ensure the protection and enhancement of biodiversity and ensuring there is a net biodiversity gain on the site through the proposed development.

- 5.14 Transport officer – The development site is a surface Pay-and-Display car park. It comprises of 30 spaces and has one point of entry and exit. The site is located in an area with a PTAL of 4 which is very good being well located to all the services and facilities.

There is suitable alternative of parking available in the nearby multi-storey car park (St Mark's Roach Car Park), where a number of levels have been closed off due to poor usage. The thrust of Transport policy is to promote active travel and public transport plus reducing car dependency (Third Local Implementation Plan, 2019 [LIP3]). The emerging Local plan and Climate Emergency action plan also picks up on this theme. So, from Transport's perspective, there is no great concern at the loss of the car park.

Car parking - Set out in the submitted Transport Statement, the development proposes to be car-free with the exception of accessible parking provision for residents. On-site

parking will only be provided for the accessible flats within the building. There will be a total of three parking bays on-site for those residents.

Cycle parking - The London Plan and London Housing SPG Standard 20 (Policy 6.9) states all developments should provide dedicated storage space for cycles: 1 per studio and one bed dwellings; and 2 per all other dwellings. Long stay cycle parking should be secure and undercover.

Recommendation: No objection in principle to the development. The following conditions should apply to any planning approval:

- The applicant enters into a Unilateral Undertaking which would restrict future occupiers of the units from obtaining an on-street residential parking permit to park in the surrounding controlled parking zones to be secured by via S106 legal agreement.
- Disabled car parking as shown maintained.
- Cycle parking to be shown maintained.
- Refuse storage arrangements.
- Demolition/Construction Logistic Plan (including a Construction Management plan in accordance with TfL guidance) should be submitted to LPA for approval before commencement of work.

- 5.15 Climate Change – The Council declared a climate emergency in July 2019 and will shortly be adopting an action plan asking that developers maximise sustainability in schemes. Whilst the original proposal sought to surpass Merton’s minimum policy standards, the applicants are seeking further solutions to apply additional measures to promote sustainability – such as the provision of PVs on the roof.

Energy statements are being updated accordingly and shall be reviewed by the Council’s Climate Change officer, any further changes to this arrangement shall be reported to the LPA.

- 5.16 Environmental Health –

- The development site is in an area that is exposed to elevated levels of noise, predominantly road traffic. The submitted noise assessment concludes that, with a suitable level of glazing for sound insulation and minimum levels of ventilation to comply with the Building Regulations, the required level of mitigation can achieve the internal noise criteria within the dwellings. This will be the minimum standard.
- Given the external noise environment and the location of this site the developer should consider going beyond the minimum standard and consider the installation of a mechanical ventilation system with their final design specification.
- Conditions have been recommended should the application be minded for approval.
- Further to the additional consultation, no supplementary comments that are relevant to Environmental Health (Noise and Nuisance) are raised.

- 5.17 Waste services – The developer should confirm that the bin store is able to accommodate the following bin capacities: 4x 1100L euro bins for refuse, 4x 1100L euro bins for mixed recycling, 1x 240L wheelie bin for food waste recycling.

- 5.18 GLAAS. Archaeology – Paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The planning application lies in an area of archaeological interest.

The revised archaeological desk-based assessment provides a useful background to the archaeology in the area surrounding the site. The site is location within an area of medieval settlement around Mitcham Upper Green, and remains relating to medieval and post-medieval activity may exist on the site.

Having looked at the proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

- 5.19 Met Police - Secure by Design – Having given due consideration to the details of the security and safety features from the information provided. The design and access statement mentions SBD in section 7.5.1. I have only a few comments and recommendations. The design of the proposed boundary wall and the raised planters should eliminate the chance of them being used for seating.

The area outside of the rear access doors to the entrance foyer has very limited natural surveillance and so may promote the opportunity for ASB. The area should be redesigned so the rear access doors are flush with the rear elevation.

The Design and Access statement states 'having two lines of security will avoid any tailgaters reaching the communal circulation area' but the Design and Access statement does not describe how this is achieved. Ideally the communal entrance should form part of an 'airlock' entry system of two sets of access controlled doors creating a lobby so to dissuade tailgating and unauthorised ingress of persons with possible criminal intent which is an issue locally.

No further comments were raised on the amended drawings.

6. POLICY CONTEXT

6.1 NPPF - National Planning Policy Framework (2019):

Part 5 Delivering a sufficient supply of homes

Part 9 Promoting sustainable transport

Part 11 Making effective use of land

Part 12 Achieving well-designed places

Part 14 Meeting the challenge of climate change, flooding and coastal change

Part 16 Conserving and enhancing the historic environment

6.2 London Plan 2016:

3.3 Increasing housing supply

3.4 Optimising housing potential

3.5 Quality and design of housing developments

3.8 Housing choice

3.9 Mixed and balanced communities

3.10 Definition of affordable housing

3.11 Affordable housing targets

3.12 Negotiating affordable housing

- 3.13 Affordable housing thresholds
 - 5.1 Climate change mitigation
 - 5.2 Minimising carbon dioxide emissions
 - 5.3 Sustainable design and construction
 - 5.13 Sustainable drainage
 - 5.17 Waste Capacity
 - 6.3 Assessing effects of development on transport capacity
 - 6.9 Cycling
 - 6.11 Smoothing traffic flow and easing congestion
 - 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
- 6.3 Merton Sites and Policies Plan July 2014 policies:
- DM D1 Urban design and the public realm
 - DM D2 Design considerations in all developments
 - DM D4 Managing heritage assets
 - DM EP4 Pollutants
 - DM H2 Housing mix
 - DM H3 Support for affordable housing
 - DM O1 Open space
 - DM O2 Nature conservation, Trees, hedges and landscape features
 - DM T1 Support for sustainable transport and active travel
 - DM T2 Transport impacts of development
 - DM T3 Car parking and servicing standards
 - DM T5 Access to road network
- 6.4 Merton Core Strategy 2011 policy:
- CS 5 Wandle Valley
 - CS 8 Housing choice
 - CS 9 Housing provision
 - CS 13 Open space, nature conservation, leisure and culture
 - CS 14 Design
 - CS 15 Climate change
 - CS 17 Waste management
 - CS 18 Transport
 - CS 20 Parking servicing and delivery
- 6.5 Supplementary planning documents
- Accessible London SPG – October 2014
 - London Housing SPG 2016
 - Technical Housing standards – nationally described space standards 2015
 - Affordable Housing and Viability SPG – August 2017
 - Merton's Waste and Recycling Storage Requirements – For Commercial and Residential Premises in the London Borough of Merton

7. PLANNING CONSIDERATIONS

7.1 The key planning considerations of the proposal are as follows:

- Principle of development
- Design and impact upon the character and appearance of the area
- Impact upon neighbouring amenity
- Standard of accommodation
- Transport, parking and cycle storage
- Refuse
- Sustainability
- Affordable housing
- Other matters
- Developer contributions

7.2 PRINCIPLE OF DEVELOPMENT

Loss of car park

7.2.1 The Car Park at Raleigh Gardens is identified in Merton's Local Plan 2020 (currently under review following Stage 2 consultation held between 31 October 2018 and 28 January 2019) as an 'opportunity' site for development – 'Site Mi11', and the Council's proposed site allocation is residential (C3) use. The allocation does not consider a mixed use combining retail and residential uses.

7.2.2 The loss of the car park at Raleigh Gardens would not be considered a harmful loss of parking facilities as there are alternative provisions within walking distance of the site, located in Mitcham Town Centre: Sibthorpe Car Park and St Mark's Road Car Park.

7.2.3 There is no policy protecting the use of land for open air car parking. Furthermore, Transport officers have also been consulted and identified suitable alternative of parking available in the nearby multi-storey car park (St Mark's Roach Car Park, with 8 levels and 277 spaces), where a number of levels have been closed off due to poor usage. The thrust of Transport policy is to promote active travel and public transport plus reducing car dependency (Third Local Implementation Plan, 2019 [LIP3]), and the emerging Local plan and Climate Emergency action plan also picks up on this theme.

7.2.4 Transport's perspective coupled with the direction of travel of the draft Local plan, redevelopment of the existing car park for housing would be in line with the draft site designation and provide a suitable edge of town centre use.

Erection of residential development

7.2.5 The National Planning Policy Framework, London Plan Policy 3.3 and the Council's Core Strategy Policy CS8 and CS9 all seek to increase sustainable housing provision and access to a mixture of dwelling types for the local community, providing that an acceptable standard of accommodation would be provided. Policy 3.3 of the London Plan 2016 also states that boroughs should seek to enable additional development capacity which includes intensification, developing at higher densities.

7.2.6 The emerging London Plan, now accorded moderate weight in recent appeal decisions issued by the Secretary of State, and anticipated to be adopted in the coming months, will signal the need for a step change in the delivery of housing in Merton. Table 3.1 of the London Plan identifies that LBM has an annual housing target of 411 units, or 4,107 over the next ten years. However, this minimum target is set to increase significantly to 918 set out in the 'London Plan Examination in Public Panel Report Appendix: Panel Recommendations October 2019', and which is expected to be adopted later this year.

- 7.2.7 Policy H1 'Increasing housing supply' (Draft London Plan Policy) and Table 4.1 of the draft London Plan sets Merton a ten-year housing completion target of 13,280 units between 2019/20 and 2028/29 (increased from the existing 10-year target of 4,107 in the current London Plan). However, following the Examination in Public (mentioned above) this figure of 13,280 has been reduced to 9,180.
- 7.2.8 Merton's latest Annual Monitoring Report 2018/19 concludes that in the years 2011-2016, 2,573 new homes were delivered which is 52% over the target. For the years 2021-26, the provision of additional homes is projected at 3,269 new homes, 59% over the target. All of the home completions this financial year were on small sites of less than 0.25 hectares in size. All of the schemes except one delivered 10 homes or fewer, with one scheme of 11 homes. Merton has always exceeded the London Plan housing target, apart from 2009/10 and this year 2018/19.
- 7.2.9 However, the anticipated increased target set of 918 units per year in the draft London Plan will prove considerably more challenging, and will require a step change in housing delivery within Merton.
- 7.2.10 Policy DM R1 seeks to protect the viability and character of Merton's town centres and neighbourhood parades whilst ensuring that there are a wide range of town centre type uses to meet the everyday needs of Merton's residents.
- 7.2.11 The National Planning Policy Framework, London Plan Policy 3.3 and the Council's Core Strategy Policy CS8 and CS9 all seek to increase sustainable housing provision and access to a mixture of dwelling types for the local community, providing that an acceptable standard of accommodation would be provided. Policy 3.3 of the London Plan 2016 also states that boroughs should seek to enable additional development capacity which includes intensification, developing at higher densities.
- 7.2.12 Proposing a wholly residential development would not be considered contrary to the character of the area. Whilst noted the site does lie within Mitcham Town Centre, the car park is toward the centre's boundary where there are no designated primary or secondary shopping frontages, and also situated toward primarily residential development. Policy DM R1 highlights the importance of protecting the viability and character of Merton's town centres. Alternative and ample off street parking is available elsewhere in Mitcham Town Centre and the provision of residential accommodation in the Town Centre would contribute to the livelihood of the area and be in line with policies to provide high quality housing in town centre areas and increase housing provision.
- 7.2.13 Whilst the introduction of residential use to the development site would respond positively to London Plan, draft London Plan and Core Strategy planning policies to increase housing supply, optimise the site and support provision of additional housing, the development scheme is also subject to all other planning considerations being equally fulfilled and compliant with the policies referred to in Section 6.

Housing mix

- 7.2.14 Policy DM H2 of Merton's Sites and Policies Plan requires development to create socially mixed communities, catering for all sectors of the community by providing a choice of housing with respect to dwelling size and type in the borough. Residential development proposals will be considered favourably where they contribute to meeting the needs of different households such as families with children, single person households and older people by providing a mix of dwelling sizes, taking account of the borough level indicative proportions concerning housing mix. Policy 3.8 of the

London Plan requires new developments offer a genuine choice of homes that Londoners can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environment.

7.2.15 Merton's Core Strategy Policy CS 8 requires 10% of new housing to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

7.2.16 The scheme provides the following unit mix:

- 29 x 1-bed units (80%)
- 7 x 2-bed units (20%)

7.2.17 The proposals would deviate from the indicative housing mix set out in the Sites and Policies Plan which envisages a broadly equal split between 1, 2 and 3 bedroom (and larger) units. This mix is informed by a number of factors, including Merton's Strategic Housing Market Assessment (SHMA 2010). Further work is being undertaken as part of the preparation of a new local plan. Merton's Strategic Housing Needs (Market) Assessment was published in July 2019.

7.2.18 Mitcham has the highest percentage of 3 bedroom houses than the borough average (based on 2011 census data) and so, an assessment is required as to whether a focus on smaller units would be harmful to the area and whether by focusing on smaller units the development fulfils other planning objectives such as optimising housing output.

7.2.19 The site is within an area of high public transport accessibility, so attractive to those needing to regularly commute and can rely less on the ownership of cars. Furthermore, the site fronts a main road with limited space to deliver garden sizes which would be expected for a more traditional family dwelling setting, accommodation for families are also more attractive with the provision of car parking facilities.

7.2.20 So, whilst the proposal of only smaller units would not strictly adhere to the indicative borough mix set out above, the proposed housing mix would in fact respond realistically to the characteristics of the site and its location whilst still promoting policy objectives of Policies 3.8 and 3.9 of the London Plan. Therefore, officers consider that the proposed housing mix would be acceptable in this instance.

7.3 CHARACTER AND APPEARANCE

7.3.1 The NPPF states that developments should function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Developments should ensure that they are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change (such as increased densities).

7.3.2 Policies CS14, DMD1 & DMD2 require that new development reflect the best elements of the character of the surrounding area, or have sufficient distinctive merit so that the development would contribute positively to the character and appearance of the built environment. Policy DM D2 of Merton's Sites and Policies Plan requires development to relate positively and 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 to use appropriate architectural forms, language, detailing and materials which complement and enhance the character of the wider setting. The requirement for good

quality design is further supported by the London Plan London Plan Policies 7.4 and 7.6.

- 7.3.3 Along Raleigh Gardens, east of the application site lies Standor House and Deseret House, both 4 storey buildings. Toward the south lies Glebe Court which is of 4-5 storeys (further inward of Glebe Court, some of the blocks rise up to 6 storeys), and toward the west lies 2 storey terrace dwellings. North of the application site lies Eldacrest House/Fair Green Parade/Durham House, ranging from 3 to 4 storeys.
- 7.3.4 Fair Green Parade currently has a planning application proposing a part single part two storey roof addition to the building (20/P0823) which would increase the corner building to 5 storeys, and as mentioned with section 2, the two neighbouring eastern blocks have been granted permission to erect 2 additional storeys, *Standor House*. 17/P3923 and *Deseret House*. 17/P3384. While these permissions have not been implemented this taller height has been established as acceptable in the immediate locality and is therefore material to the assessment.
- 7.3.5 The proposed development comprises two regular rectangular building forms, 5 and 6 storeys, joined by a central stairwell. Notable amendments of the design (which were re-consulted) include the removal of the gable roofs to provide flat roofs, widening of windows to the staircore on the northern elevation and re-grouping of windows to the 6 storey block, details assisting to reduce the appearance of height and scale.
- 7.3.6 Officers considered that whilst gable ends and pitched roofs are present in the locality, on far smaller buildings than that proposed, the gable roof design of the original proposal appeared as rather an arbitrary detail. Removing this has simplified its form and reduced unnecessary height to the building (around 2m), and offers a simpler and pleasing roof treatment.
- 7.3.7 To avoid the appearance of bulkiness, the building mass has been broken up into two interlocking blocks; the red brick materiality has been appropriately expressed to add interest to the façade and to ensure balance in the use of one material, and not for the extensive use of brick to appear overwhelming, such as: perforated brick wall details on the balconies and stairwell and recessed brick walls. The amendment of widening the staircore glazing is also considered appropriate and adds interest to the appearance of the building. As described in the design and access statement: “The layered brick façade with its strong grid, broken down by shifts in the vertical alignment of brick piers and window positions creates the sense of a solid building, with a degree of playfulness and interest to the elevations”.
- 7.3.8 Sited within the Town Centre, it is noted such a location is appropriate for taller development. Merton’s Tall Buildings Background Paper 2010 states in the context of Merton, where most of the borough is characterised by 2 storey suburban houses, any building of 4 storeys or higher could be considered a tall building. In the town centres however this height may well be considered average, and have little presence in its surrounding environment.
- 7.3.9 The height of the building has been considered as a transition between the smaller scale terrace houses and the taller flatted developments. Viewing the height of the buildings from Raleigh Gardens, there is an appropriate flow of building heights. Standor House and the terrace dwellings on Raleigh Gardens are also suitably distanced from the site so the heights display an appropriate rise and fall. Officers consider the proposed heights (5/6 storeys) do not appear overpowering and are appropriate in a edge of town centre context.

7.3.10 Toward the rear, the immediate block at Glebe Court displays 4-5 storeys, so in terms of height is considered to be in keeping. The proposed 5 storey block would be approximately 0.8m taller than the 5 storey block of Glebe Court, and the proposed 6 storey block would be approximately 3.8m taller. However, there would also be a breathing space retained between the buildings (maximum of up to 20m set back) which would ensure the blocks are suitably distanced and legible as individual masses, and the proposed development would not inappropriately encroach toward the boundary of the Conservation Area. The space between the buildings retain a number of mature trees along the Conservation Area boundary to create a natural buffer between the sites.

7.4 NEIGHBOURING AMENITY

7.4.1 SPP Policy DM D2 states that proposals must be designed to ensure that they would not have an undue negative impact upon the amenity of neighbouring properties in terms of loss of light, quality of living conditions, privacy, visual intrusion and noise.

Standor House

7.4.2 Toward the rear (south) of the site is Glebe Court, a development of 4-5 storeys, and toward the side (east) of the site is Standor House and Deseret House. Noted previously, Standor House has been granted permission to erect 2 additional storeys. However, this permission has only been granted in principle, not yet finalised, therefore, the assessment shall only consider this as its existing 4 storey height.

7.4.3 Whilst the proposed development would be approximately 6m taller than Standor House, there would be a separation distance retained of 30m between the buildings. This is considered reasonable setback which does not raise particular concerns in terms impact toward neighbouring views, outlook or light.

Raleigh Gardens (terrace dwellings)

7.4.4 Between the proposed development and the closest terrace dwelling on Raleigh Gardens, number 10, there would be a separation distance of approximately 15m. The proposed development would be visible from the rear gardens of the terrace dwellings and given their western orientation there may be some impact in terms of light, but the Daylight and Sunlight Report has assessed windows of numbers 10, 12 and 14, and results show that the assessed windows would retain very good levels of daylight. The removal of the gable roof further assists in reducing the building's visual dominance from the neighbouring garden areas. Overall, impact toward their amenity would not be considered detrimental.

Glebe Court

7.4.5 Between the proposed building and the west-most wing (4 storey element) of Glebe Court would be a separation distance of 9m, and from the northern elevation of Glebe Court (where there are the external walkways) would be a separation of around 18-20m.

7.4.6 The Daylight and Sunlight Report has assessed 58 windows at Glebe Court. 26 windows meet the levels detailed in the BRE, 3 windows will experience a minor adverse effect being subject to between a 20-29% reduction, 6 windows are subject to a moderate reduction receiving a reduction of between 30-39% and 17 windows are subject to noticeable losses. The northern elevation of Glebe Court features covered walkways which have some contribution to the shading of daylight to existing windows – the Daylight and Sunlight report acknowledges this and calculates that without the

covered walkways, there would be a 30% improvement to the affected windows.

7.4.7 Daylight will always be restricted when infilling an open site as the previous daylight levels to Glebe Court would have been at their highest level. The Daylight and Sunlight Report states: “In practical terms the importance of daylight needs to be considered for the activities and, or the purpose of a room. Material factors of flats within Glebe Court are: they are dual aspects flats allowing for daylight to enter from both sides; the affected rooms are bedrooms and kitchens. A bedroom is generally used for sleeping and storage therefore the dependency on daylight is less critical. The BRE states that a critical daylight area in a kitchen is the sink, our research indicates that the sinks are located adjacent to the windows, which should receive enough daylight. That the flats are dual aspect should be considered. The flats, although subject to reductions, should still receive enough daylight for the occupiers to use and enjoy”.

7.4.8 Overall, officers consider that while there would be some impact in terms of outlook and light, it would not be at such a harmful degree which to warrant refusal of the scheme.

7.5 STANDARD OF ACCOMODATION

Internal

7.5.1 Policy 3.5 of the London Plan 2016 requires housing development to be of the highest quality internally and externally, and should satisfy the minimum internal space standards (specified as Gross Internal Areas –GIA) as set out in Table 3.3 of the London Plan. Table 3.3 provides comprehensive detail of minimum space standards for new development; which the proposal would be expected to comply with. Policy DMD2 of the Adopted Sites and Policies Plan (2014) also states that developments should provide suitable levels of sunlight and daylight and quality of living conditions for future occupants.

	Level	Type	Storeys	Proposed GIA (sqm)	Required GIA (sqm)	Compliant
Unit 1	Ground	2b4p	1	85	70	Yes
Unit 2	Ground	1b2p	1	61	50	Yes
Unit 3	Ground	1b2p	1	65	50	Yes
Unit 4	Ground	1b2p	1	53	50	Yes
Unit 5	Ground	1b2p	1	50	50	Yes
Unit 6	First	1b2p	1	50	50	Yes
Unit 7	First	1b2p	1	52	50	Yes
Unit 8	First	1b2p	1	52	50	Yes
Unit 9	First	1b2p	1	50	50	Yes
Unit 10	First	2b4p	1	72	70	Yes
Unit 11	First	1b2p	1	52	50	Yes
Unit 12	First	1b2p	1	50	50	Yes
Unit 13	Second	1b2p	1	50	50	Yes
Unit 14	Second	1b2p	1	52	50	Yes
Unit 15	Second	1b2p	1	52	50	Yes
Unit 16	Second	1b2p	1	50	50	Yes
Unit 17	Second	2b4p	1	72	70	Yes
Unit 18	Second	1b2p	1	52	50	Yes
Unit 19	Second	1b2p	1	50	50	Yes
Unit 20	Third	1b2p	1	50	50	Yes
Unit 21	Third	1b2p	1	52	50	Yes

Unit 22	Third	1b2p	1	52	50	Yes
Unit 23	Third	1b2p	1	50	50	Yes
Unit 24	Third	2b4p	1	72	70	Yes
Unit 25	Third	1b2p	1	52	50	Yes
Unit 26	Third	1b2p	1	50	50	Yes
Unit 27	Fourth	1b2p	1	50	50	Yes
Unit 28	Fourth	1b2p	1	52	50	Yes
Unit 29	Fourth	1b2p	1	52	50	Yes
Unit 30	Fourth	1b2p	1	50	50	Yes
Unit 31	Fourth	2b4p	1	72	70	Yes
Unit 32	Fourth	1b2p	1	52	50	Yes
Unit 33	Fourth	1b2p	1	50	50	Yes
Unit 34	Fifth	2b4p	1	72	70	Yes
Unit 35	Fifth	1b2p	1	52	50	Yes
Unit 36	Fifth	1b2p	1	50	50	Yes

7.5.2 As demonstrated by the table above, all the units would comply with the minimum space standards.

7.5.3 The design achieves dual aspects for all the residential units.

External

7.5.4 In accordance with Merton Site's and Policies Policy DMD2, all new houses are required to provide a minimum garden area of 50 sqm as a single usable regular shaped amenity space. For flatted dwellings, a minimum of 5sqm of private outdoor space should be provided for 1-2 person flatted dwellings (also specified in the Mayor's Housing Supplementary Planning Guidance) and an extra 1 sqm should be provided for each additional occupant.

	Type	Proposed amenity (sqm)	Required amenity (sqm)	Compliant
Unit 1	2b4p	30	7	Yes
Unit 2	1b2p	64	5	Yes
Unit 3	1b2p	53	5	Yes
Unit 4	1b2p	89	5	Yes
Unit 5	1b2p	50	5	Yes
Unit 6	1b2p	5	5	Yes
Unit 7	1b2p	5	5	Yes
Unit 8	1b2p	5	5	Yes
Unit 9	1b2p	5	5	Yes
Unit 10	2b4p	7	7	Yes
Unit 11	1b2p	5	5	Yes
Unit 12	1b2p	5	5	Yes
Unit 13	1b2p	5	5	Yes
Unit 14	1b2p	5	5	Yes
Unit 15	1b2p	5	5	Yes
Unit 16	1b2p	5	5	Yes
Unit 17	2b4p	7	7	Yes
Unit 18	1b2p	5	5	Yes
Unit 19	1b2p	5	5	Yes
Unit 20	1b2p	5	5	Yes
Unit 21	1b2p	5	5	Yes

Unit 22	1b2p	5	5	Yes
Unit 23	1b2p	5	5	Yes
Unit 24	2b4p	7	7	Yes
Unit 25	1b2p	5	5	Yes
Unit 26	1b2p	5	5	Yes
Unit 27	1b2p	5	5	Yes
Unit 28	1b2p	5	5	Yes
Unit 29	1b2p	5	5	Yes
Unit 30	1b2p	5	5	Yes
Unit 31	2b4p	7	7	Yes
Unit 32	1b2p	5	5	Yes
Unit 33	1b2p	5	5	Yes
Unit 34	2b4p	7	7	Yes
Unit 35	1b2p	5	5	Yes
Unit 36	1b2p	5	5	Yes

7.5.5 As demonstrated by the table above, all the units would provide sufficient external amenity areas.

7.6 TRANSPORT, PARKING AND CYCLE STORAGE

7.6.1 Core Strategy Policy CS20 requires that development would not adversely affect pedestrian or cycle movements, safety, the convenience of local residents, street parking or traffic management. Cycle storage is required for all new development in accordance with London Plan Policy 6.9 and Core Strategy Policy CS18. It should be secure, sheltered and adequately lit and Table 6.3 under Policy 6.13 of the London Plan stipulates that 1 cycle parking space should be provided for a studio/1 bedroom unit and 2 spaces for all other dwellings.

7.6.2 The site is located in an area with a PTAL of 4 which is very good being well located to all the services and facilities. The Car Park in Raleigh Gardens is not located in a Controlled Parking Zone, but immediately adjacent are Controlled Parking Zones MTC and MTC1.

7.6.3 However, the proposed development would be car-free as set out in the applicant's submitted Transport Statement, with the exception of accessible parking provision for residents. On-site parking will only be provided for the accessible flats within the building, there will be a total of three parking bays on-site for those residents.

7.6.4 The Transport officer considers a car-free development acceptable and advises that the applicant enter into a suitable legal undertaking which would restrict future occupiers of the units from obtaining an on-street residential parking permit to park in the surrounding controlled parking zones.

7.6.5 In relation to cycle storage, the London Plan and London Housing SPG Standard 20 (Policy 6.9) states all developments should provide dedicated storage space for cycles: 1 per studio and one bed dwellings; and 2 per all other dwellings. The proposed development would provide a cycle store containing 44 cycle spaces. The number of units indicate that 42 cycle spaces would be required. Therefore, the proposed provision would exceed the minimum requirement and is considered acceptable.

7.7 REFUSE

- 7.7.1 The London Plan Policy 5.17 and Merton Core Strategy Policy CS17 require new developments to show capacity to provide waste and recycling storage facilities.
- 7.7.2 Merton's Waste and Recycling Storage Requirements require that residents do not have to walk more than 30metres to dispose of their waste and recycling in accordance to Building Regulations 2002, Part H. The collection vehicle shall be able to approach the container store or collection point within a maximum distance of 10 metres.
- 7.7.3 Amendments to the scheme included re-location of the refuse store on the ground floor, from the front of the building to the rear, in order to be collected along Glebe Court and not the layby present along Raleigh Gardens as initially proposed.
- 7.7.4 This route is considered acceptable by Waste Services, and would form part of the existing collection route from Glebe Court.

7.8 SUSTAINABILITY

- 7.8.1 All major residential development proposals will need to demonstrate:
- a) Compliance with Merton's Core Planning Strategy Policy CS15 Climate Change (parts a-d) and the Policies in outlined in Chapter 5 of the London Plan (2016) through submission of a detailed energy strategy.
 - b) Proposals will need to demonstrate compliance with zero emissions target outlined in Policy 5.2 of the London Plan (2016):
 - i. Development proposals must achieve a minimum on-site emissions reduction target of a 35% improvement against Part L 2013, with the remaining regulated emissions (to 100% improvement against Part L 2013) to be offset through *cash in lieu contribution*, and secured via Section 106 agreement. The contribution will be used to enable the delivery of carbon dioxide savings elsewhere in the borough;
 - ii. The cash in lieu contribution will be collected according to the methodology outlined in the Mayor's Sustainable Design and Construction SPG. This will require each tonne of CO2 shortfall to be offset at a cost of £60 per tonne for a period of 30 years (i.e. 60 x 30 = £1800 per tonne CO2);
 - iii. Major residential developments will be expected to calculate and demonstrate the cumulative CO2 emissions savings to be offset through cash in lieu contribution (in accordance with the above approved methodology, and in line with the Mayor's guidance on preparing energy assessments as part of their submitted energy strategy.
 - c) Achieve wholesome water consumption rates not in excess of 105 litres per person per day.
- 7.8.2 The Council declared a climate emergency in July 2019 and will shortly be adopting an action plan asking that developers maximise sustainability in schemes. Whilst the original proposal sought to surpass Merton's minimum policy standards, the applicants

are seeking further solutions to apply additional measures to promote sustainability – such as the provision of PVs on the roof. Energy statements are being updated accordingly and shall be reviewed by the Council’s Climate Change officer. Officers consider that this should not impede the determination of the application and that the application of a combination of suitably robust conditions along with legal requirements to secure appropriate carbon offset contributions would ensure that the scheme met adopted standards or mitigated the impact of the development were any shortfall to arise.

7.9 AFFORDABLE HOUSING

7.9.1 This matter is assessed within a separate overarching report, which links the 4 Merantun Development applications.

7.10 OTHER MATTERS

Trees and Ecology

7.10.1 Policy DM O1 requires protection and enhancement of open space and to improve access to open space. The Council will continue to protect Metropolitan Open Land (MOL) and designated open spaces from inappropriate development in accordance with the London Plan and government guidance. Policy DM O2 seeks to protect and enhance biodiversity, particularly on sites of recognised nature conservation interest. To protect trees, hedges and other landscape features of amenity value and to secure suitable replacements in instances where their loss is justified.

7.10.2 The Council’s tree officer has been consulted and notes that the amended arboricultural report shows that all the trees within the car park are proposed for removal with the development, this amounts to 16 trees - 7 of which have been graded as 'B' category trees. 17 new trees are proposed, only 6 will be in prominent positions facing the street. A suitably worded condition would be required ensuring new trees are secured as part of any new landscaping. With a condition requiring a further detailed landscaping scheme, there is potential to incorporate more trees within the scheme and to reconsider retention of some existing grade B trees which have a positive prominent size and stature toward Raleigh Gardens.

7.10.3 As a matter of judgement, it may be considered that replacement planting on site does not sufficiently mitigate for the impact of the loss of the trees. The thrust of the NPPF is to find solutions to planning issues. With regard to offsetting the loss of mature trees consideration may be given to securing a contribution towards off site planting although any financial contribution would require properly quantifying.

7.10.4 The application site is located within the Wandle Valley Regional Park 400m buffer. The Wandle Valley will act as a strategic fulcrum in bringing together initiatives that will contribute towards bridging the gap between the east and the west of Merton. Policy CS 5’s objectives seeks to support the creation of the Wandle Valley Regional Park, achieving a high quality, linked green infrastructure network, protecting biodiversity and providing opportunities for formal and informal recreation.

7.10.5 The Council’s Ecology officer has reviewed the findings and recommendations set out in the submitted ‘Preliminary ecological appraisal, bat roost assessment and tree survey’ and consider these reasonable, and should be incorporated as suitably worded planning conditions to ensure the protection and enhancement of biodiversity and ensuring there is a net biodiversity gain on the site through the proposed development.

Archaeology

- 7.10.5 GLAAS were re-consulted on the revised archaeological desk-based assessment and considers that the assessment provides a useful background to the archaeology in the area surrounding the site. The site's location is within an area of medieval settlement around Mitcham Upper Green, and remains relating to medieval and post-medieval activity may exist on the site.
- 7.10.6 Having looked at the proposal and at the Greater London Historic Environment Record, GLAAS advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
- 7.10.7 This recommended condition will be attached should the application be approved.

7.11 DEVELOPER CONTRIBUTIONS

- 7.11.1 The proposed developments would all be subject to payment of the Merton Community Infrastructure Levy and the Mayor of London's Community Infrastructure Levy (CIL).

8. CONCLUSION

- 8.1 It is considered the loss of the existing car park would not be detrimental as suitable alternative parking facilities are identified within walking distance in Mitcham Town Centre. The redevelopment of the site would allow for the intensification of the land to deliver housing, and the proposal of a wholly residential building would be considered suitable to contribute to the vitality of the Town Centre with housing. The simple, yet modern architectural design of the building would be compatible with and has the potential to enhance the Raleigh Gardens streetscene, and would preserve the appearance of the adjoining Conservation Area. The building would also not have a harmful impact toward the amenity of neighbouring properties.
- 8.2 It is therefore recommended to grant planning permission subject to conditions; and a suitable legal agreement requiring the development to be permit free, provide carbon offset contributions, potentially an offsite contribution towards tree planting, and enable the delivery of affordable housing provision as part of the collective development of all 4 Merantun Development sites.

RECOMMENDATION

Grant planning permission subject to the completion of an appropriate legal agreement to deliver the following:

- Affordable housing off site as part of a comprehensive 4 site development package which includes this site;
- Carbon offset financial contributions (sums to be confirmed);
- Restrictions on parking permit eligibility.
- Financial contribution towards off site tree planting (sums to be confirmed).

And the following conditions:

1. A1 Commencement of Development
2. A7 Approved Plans
B1 External Materials to be approved – prior to commencement of development (other than site preparation and works up to DPC level)
3. B4 Details of surface treatment – Prior to occupation of development, further details of the surfacing of all those parts of the site not covered by buildings or soft landscaping, including any parking, service areas or roads, footpaths, hard and soft shall be submitted in writing for approval by the Local Planning Authority (providing specification of product where appropriate). The development shall not be occupied until the details have been approved and works to which this condition relates have been carried out in accordance with the approved details.
4. B5 Details of Walls/Fences – Prior to occupation of development, further details (providing specification of product where appropriate) of boundary walls and fences shall be submitted in writing for approval to the Local Planning Authority. No works which are the subject of this condition shall be occupied until the details are approved and carried out in accordance with the approved details. The walls and fencing shall be permanently retained thereafter.
5. C07 Refuse & Recycling (details to be submitted) – No development shall be occupied until a scheme for the storage of refuse and recycling has been submitted in writing for approval to the Local Planning Authority. No works which are the subject of this condition shall be occupied until the scheme has been approved and carried out in full. Those facilities and measures shall thereafter be retained for use at all times from the date of first occupation.
6. D10 External Lighting – Any external lighting shall be positioned and angled to prevent any light spillage or glare beyond the site boundary.
7. Non-standard condition – Notwithstanding the lightning strategy shown on page 14 of the 'Landscape Planning Statement' (ref: ExA_1930_RG_Planning_Statement Rev C), an amended lighting scheme with specification of lighting products to be installed on the site shall be submitted to the Council for approval prior to occupation of the development.
8. D11 Construction Times – No demolition or construction work or ancillary activities such as deliveries shall take place before 8am or after 6pm Mondays - Fridays inclusive, before 8am or after 1pm on Saturdays or at any time on Sundays or Bank Holidays.
9. F01 Landscaping/Planting Scheme – Notwithstanding the Planting Plan layout shown on drawing ref: ExA_1930_RG_201 Rev C and the Tree & Planting strategy within the 'Landscape Planning Statement' (ref: ExA_1930_RG_Planning_Statement Rev C), a revised detailed landscaping, tree and planting scheme shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of the development, these works shall then be carried out as approved before the occupation of the buildings hereby approved unless otherwise agreed in writing by the Local Planning Authority. The details shall include on a plan, full details of the size, species, spacing, quantities and location of proposed plants, together with any hard surfacing, means of enclosure, and indications of all existing trees, hedges and any other features to

be retained, and measures for their protection during the course of development.

10. Non-standard condition (ecology) – The recommendations set out in the ‘Preliminary ecological appraisal, bat roost assessment and tree survey of Raleigh Gardens Car Park, Mitcham, London Borough of Merton’ by CGO Ecology Ltd, dated 16/08/2019, shall be followed/incorporated into the development scheme throughout the construction process and prior to occupation of the development.
11. H03 Redundant Crossovers – The development shall not be occupied until the existing redundant crossover/s have been removed by raising the kerb and reinstating the footway in accordance with the requirements of the Highway Authority.
12. H04 Provision of Vehicle Parking – The 3 off-street disabled parking spaces shown on the approved plans shall be provided before the occupation of the buildings or use hereby permitted and shall be retained for parking purposes for occupiers and users of the development and for no other purpose.
13. H05 Visibility Splays – Prior to the occupation of the development 2 metre x 2 metre pedestrian visibility splays shall be provided either side of the vehicular access to the site. Any objects within the visibility splays shall not exceed a height of 0.6 metres.
14. H06 Cycle Parking (Details to be submitted) – No development shall be occupied until details of secure cycle parking facilities for the occupants of, and visitors to, the development have been submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be fully implemented and made available for use prior to the first occupation of the development and thereafter retained for use at all times.
15. Non-standard condition (sustainability) – No part of the development hereby approved shall be occupied until evidence has been submitted to the Local Planning Authority confirming that the development has achieved CO2 reductions of not less than a 35% improvement on Part L regulations 2013, and wholesome water consumption rates of no greater than 105 litres per person per day.
16. Non-standard condition (Noise) – Due to the potential impact of the surrounding locality on the residential development, a scheme for protecting residents from noise shall be submitted to and approved in writing by the Local Planning Authority prior to the development commencing. The scheme is to include acoustic data for the glazing system and ventilation system. The internal noise levels shall meet those within BS8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings and ProPG: Planning and Noise – Professional Practice Guide, Publ: (ANC, IOA, CIEH) May 2017 as a minimum. The approved scheme shall be implemented in accordance with the agreed details.
17. No development shall take place, other than site preparation, until a Demolition **and** Construction Logistics Plan (including a Construction Management plan in accordance with TfL guidance) has been submitted to, 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 works

18. Non-standard condition (Archaeology) – No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

19. Non-standard condition (Archaeology) – If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.

B. Where appropriate, details of a programme for delivering related positive public benefits.

C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informatives

1. INF 01 Party Walls Act
2. INF 08 Construction of Accesses – It is Council policy for the Council's contractor to construct new vehicular accesses. The applicant should contact the Council's Highways Team prior to any work starting to arrange for this work to be done.
3. INF 09 Works on Public Highway
4. INF 12 Works affecting the public highway
5. INF 20 Street naming and numbering
6. INF Sustainability
7. INF Swifts
8. INF Thames Water
9. INF Street trees – Any works relating to Street Trees needs to refer to the Council's Greenspaces Team.
10. INF GLAAS – 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. INF GLAAS – An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.
12. Note to Applicant – approved schemes