

PLANNING APPLICATIONS COMMITTEE

26 APRIL 2023

CASE OFFICER REPORT

APPLICATION NO.

22/P1819

DATE VALID

10/06/2022

Site Address:

Wimbledon Chase Railway Station, Kingston Road & 45-48 Rothesay Avenue, Raynes Park, London, SW20 8JT

Ward:

Wimbledon Town and Dundonald Ward

Proposal:

Demolition of the existing entrance to Wimbledon Chase Station and adjacent retail units and 45-48 Rothesay Avenue and the erection of a new station entrance and building ranging in height between three to nine storeys with retail use at ground floor, with 74 residential flats above, on first to eighth floor, associated vehicle and cycle parking, refuse and plant.

Drawing Nos:

See condition 2

Contact Officer:

Tim Lipscomb (020 8545 3496)

RECOMMENDATION

Grant Permission Subject to Section 106 Obligation or any other enabling agreement

CHECKLIST INFORMATION

Is a screening opinion required	No
Is an Environmental Statement required	No
Press notice	Yes
Site notice	Yes
Design Review Panel consulted	No
Number of neighbours consulted	166
External consultations	Yes
Internal consultations	Yes
Controlled Parking Zone	Yes (5F)

Conservation Area	No
Archaeological Priority Zone	No
Public Transport Accessibility Rating	3
Tree Protection Orders	No

1. INTRODUCTION

- 1.1.1 This application is being brought to the Planning Applications Committee for determination due to scale and nature of the development and number of objections received.

2. SITE AND SURROUNDINGS

- 2.1.1 The application site is located on the northern side of Kingston Road, Wimbledon Chase (within the Wimbledon Town and Dundonald Ward), on the junction with Rothesay Avenue and adjacent to the railway line.
- 2.1.2 The site has an area of 0.127 hectares and currently comprises a single storey building which accommodates the entrance way to Wimbledon Chase train station, along with a retail unit, 'Grate Expectations' (246sqm floor space), which fronts onto Kingston Road. The rear of the site is occupied by a pair of two-storey semi-detached maisonettes, along Rothesay Avenue. Access to the station platforms is via the entrance, through a corridor and up a set of steps. The railway tracks pass either side of the station platform.
- 2.1.3 To the north of the site is residential development (a further pair of semi-detached maisonettes and two-storey houses), with short terraces of two storey mainsonettes on the opposite side of Rothesay Avenue and commercial development to the east, along Kingston Road.
- 2.1.4 The immediate surrounding area fronting onto Kingston Road, has a mixed form, with buildings up to five storeys in height on the north side of Kingston Road and four storeys opposite the site with commercial/non-residential uses on the ground floor and flats above
- 2.1.5 There is currently a ground level car park to the frontage of the site providing six car parking spaces, serving 'Grate Expectations', with a single vehicular access from Rothesay Avenue.
- 2.1.6 The pavement fronting the site at Kingston Road is relatively wide at around 6.5m and is partly occupied by benches, on-street bicycle parking and street trees, along with a telephone box and public recycling facilities.
- 2.1.7 The site is within the Wimbledon Chase Neighbourhood Parade
- 2.1.8 The railway embankment adjacent to the site, to the northwest, forms part of a Green Corridor and is also classified as a Site of Nature Conservation Importance in the Council's Sites and Policies Plan (2014).
- 2.1.9 The site is within Flood Zone 1 but is within an area at risk of surface water flooding, as detailed in the Council's Strategic Flood Risk Assessment.
- 2.1.10 The site has a PTAL rating of 3. The site is within controlled parking zone (CPZ) 5F,

which restricts parking Monday – Friday 8.30am - 6.30pm.

3. CURRENT PROPOSAL

- 3.1.1 Planning permission is sought for the redevelopment of the site, to include the demolition of the existing single storey station building and the adjacent pair of semi-detached maisonettes, (Nos.45-48 Rothesay Avenue). Following demolition it is proposed to erect a building ranging in height between four to nine storeys with retail use at ground floor, a mix of studios, one and two bed flats on first to eight floor (a total of 74 flats), associated vehicle and cycle parking, refuse and plant.
- 3.1.2 At ground floor a 155.5sqm retail unit to front onto Kingston Road is proposed, behind which sits two residential entrance cores accessed from Rothesay Avenue with associated refuse, cycle parking, plant and substation. A new public station entrance would be provided on the western side of the site. This includes facilities and 'back of house' for station staff. A further entrance would be provided to the rear and accessed from Rothesay Avenue for staff only, along with two parking spaces for use by Network Rail maintenance team. This rear access would also have the ability to be used as an alternative station access in the future during construction works facilitating step free access to the station platforms. A 218sqm residents' communal facility is also provided fronting onto Rothesay Avenue (which could be used for home working, gym, meeting room etc).
- 3.1.3 At first floor level and above would be residential flats, with either a south, east or west aspect or a combination
- 3.1.4 As the scheme rises in height, it steps back from the northern and eastern edges of the site. The first step back is at third floor, then at seventh and again at eight, making the footprint at the top of the building significantly smaller than at ground floor. The step backs provide the opportunity for green roofs and external communal amenity space to be provided. 100sqm of green roof is provided at fourth floor along with ground source heat pumps, 78sqm of amenity space at seventh floor and 239.5sqm of amenity space on the roof.
- 3.1.5 The roof also accommodates photovoltaic panels which forms part of the buildings energy strategy.

Accessibility

- 3.1.6 All of the accommodation meets M4(2) of the building regulations. 5 x 2b/3p and 2 x 3b/5p would meet Building Regulation standard M4(3), being wheelchair accessible. Step-free access to the flats is facilitated by the two lift cores and generous width corridors.
- 3.1.7 A platform lift is provided on the top floor to give step-free access for residents and visitors to the roof top shared amenity space. Most of the flats are provided with their own private amenity space, either a balcony or a roof terrace. In addition, a shared amenity space of 239.5 square metres is provided on the roof. Access is provided for all residents either by stairs or a platform lift from the eighth floor.

Materials

- 3.1.8 Facing materials would be pale cream facing brickwork with vertical soldier courses, buff/brown brick, PPC coated window frames and balconies, dark green, glazed pale cream signage and grey/green louvres. The front part of the building would be largely cream facing brick with the section to the rear being buff/brown facing brick.
- 3.1.9 The proposal includes the provision of cream lettering (green background) signage to

be positioned to the frontage at ground floor level to read: "Wimbledon Chase Station".

- 3.1.10 The flat roof to the station would be a green roof, with other elements of green roof at first floor level, third floor, seventh floor, eighth floor and at roof level (roof level is a brown/biodiverse roof).
- 3.1.11 There would be a communal roof terrace at third floor level, seventh floor level and another on the eighth floor.
- 3.1.12 Solar panels and air source heat pumps would be accommodated at roof level.

Highways

- 3.1.13 In terms of cycle parking, the south core would provide 94 bike parking spaces, and 48 bike parking spaces in the north core (a total of 142 spaces). This includes 10 spaces for oversized bicycles.
- 3.1.14 The proposed scheme provides two enclosed car parking spaces for Network Rail maintenance vehicles. The new access for this parking would result in the loss of 2 on street car parking bay spaces, but these would be re-provided on Rothesay Avenue.
- 3.1.15 The existing 6 car parking spaces on the forecourt to the existing 'Grate Expectations' would be removed to facilitate the development.
- 3.1.16 No car parking for residents would be provided. However, three blue badge holder spaces would be provided on Rothesay Avenue (these would not be reserved for the occupiers of the proposed development).

Servicing

- 3.1.17 On Kingston Road, a new lay-by is proposed, to allow for servicing (3.0m by 17.5m). The 2 on-street car parking bays that would be displaced would be re-provided on Rothesay Avenue. The kerb line to the junction of Rothesay Avenue and Kingston Road would be built out to partially enclose the lay-by (similar to the existing lay-by some 48m to the east). Therefore, there would be no overall loss of on-street car parking.
- 3.1.18 In terms of refuse, currently Network Rail refuse bins are stored in the station entrance. The proposed scheme provides Network Rail with a 'back of house' maintenance area which provides space for their bins in addition to a grit store (for use on platforms in icy weather conditions). A refuse and recycling store for residents would be located between the two residential entrance halls. The store is accessed from Rothesay Avenue. A space for bulky waste would be provided.
- 3.1.19 The existing pavement on the west side of Rothesay Avenue is narrow for approximately for the first 20 metres. The proposed layout would increase the pavement width from 1.2m to 1.8m
- 3.1.20 The scheme has been designed to show how step free access could be delivered on the site in the future if the funding becomes available to do so. A summary showing how this would be achieved is provided within section 6.6 of the Design and Access Statement. However, the provision of step-free access is not part of this current proposal. The submission sets out that the future approach would be to tunnel into the embankment from Chaseside Avenue and install a lift connecting the new tunnel to the end of the existing platform. The tunnel would also connect to the proposed new station entrance provided in this proposal. The new station entrance could be closed while this connection work is being carried out and temporary passenger access could be provided via the Network Rail service corridor at the rear on Rothesay Avenue.

Affordable Housing

- 3.1.21 The affordable housing offer has been amended several times throughout the course of the application. Initially, no affordable housing was proposed on the basis of it not being financially viable. The applicant then investigated a potential option to offset the CIL contribution, which would allow for more affordable housing provision. However, this approach would require a new Council policy and would also deprive the Council of the contribution towards other infrastructure through the CIL regime. The applicant has reviewed the position and notwithstanding the financial viable position, has made an offer of 20% affordable housing by habitable room with a 50/50 split between affordable rent and intermediate rent (12 units).

Ecology

- 3.1.22 In terms of ecology, the submission sets out that bat and bird boxes could be incorporated. Measures to minimize any potential impact on protected species would be carried out during the construction process.

Flooding

- 3.1.23 In terms of Sustainable Urban Drainage Systems (SuDS), green/blue roofs and rainwater harvesting butts are proposed.

Trees

- 3.1.24 The submitted Arboricultural Impact Assessment sets out that no trees would need to be removed but there will be a requirement to prune back the canopy of trees identified as T4 and G1 to the boundary. Tree protection measures are also proposed for street trees

Sustainability

- 3.1.25 In terms of sustainability measures, the scheme proposes:

- Passive measures (low U-values, air permeability, avoidance of thermal bridging by accredited details)
- High efficiency services, i.e. boilers, low energy lights, high efficiency ventilation
- Renewable sources: Communal air source heat pump, solar PV

The proposed development would achieve:

- 62% domestic regulated CO2 reduction against 2013 Part L compliant baseline
- 54% domestic regulated CO2 reduction by renewable sources
- 42% non-domestic regulated CO2 reduction against 2013 Part L compliant baseline

- 3.1.26 Schedule of accommodation:

First Floor	Type	GIA	External amenity space
S1.01	Studio	37.2	9.5
S1.02	1b	50.7	14.4
S1.03	1b	50.7	14.3
S1.04	2b/4p	70.7	7.4
S1.05	2b/4p	71	9.6
S1.06	2b/3p	78.2	5.4

S1.07	2b/3p	77.3	6.4
N1.01	2b/3p	78.8	7.2
N1.02	3b/5p	101	8.3
N1.03	1b	50.8	5.7
N1.04	1b	51	6
Second Floor	Type	GIA	External amenity space
S2.01	Studio	37.3	5.3
S2.02	1b	50.7	5.5
S2.03	1b	50.7	5.5
S2.04	2b/4p	70.7	7.4
S2.05	2b/4p	71	7.4
S2.06	1b	50.7	5.4
S2.07	1b	50.5	5.2
S2.08	1b	51.7	6.4
N2.01	2b/3p	78.8	7.2
N2.02	3b/5p	101	8.3
N2.03	1b	50.8	5.7
N2.04	1b	50.8	5.7
Third Floor	Type	GIA	External amenity space
S3.01	Studio	37.3	5.3
S3.02	1b	50.7	5.5
S3.03	1b	50.7	5.5
S3.04	2b/4p	70.7	7.4
S3.05	2b/4p	71	7.4
S3.06	1b	50.7	5.4
S3.07	1b	50.5	5.2
S3.08	1b	51.7	6.4
N3.01	2b/3p	78.8	7
N3.02	4b/6p	103.7	11.4
Fourth Floor	Type	GIA	External amenity space
S4.01	Studio	37.3	5.3
S4.02	1b	50.7	5.5
S4.03	1b	51.7	5
S4.04	2b/4p	70.7	7.4
S4.05	2b/4p	71	7.4
S4.06	1b	50.7	5.4
S4.07	1b	50.5	5.2
S4.08	1b	51.7	6.4
N4.01	2b/4p	78.5	7
N4.02	2b/4p	72.7	41.7
Fifth Floor	Type	GIA	External amenity space
S5.01	Studio	37.3	5.3
S5.02	1b	50.7	5.5
S5.03	1b	51.7	5
S5.04	2b/4p	70.7	7.4
S5.05	2b/4p	71	7.4
S5.06	1b	50.7	5.4
S5.07	1b	50.5	5.2

S5.08	1b	51.7	6.4
N5.01	2b/4p	78.8	7
N5.02	2b/4p	72.7	9.3
Sixth Floor	Type	GIA	External amenity space
S6.01	Studio	37.3	5.3
S6.02	1b	50.7	5.5
S6.03	1b	51.7	5
S6.04	2b/4p	70.7	7.4
S6.05	2b/4p	71	7.4
S6.06	1b	50.7	5.4
S6.07	1b	50.5	5.2
S6.08	1b	51.7	6.4
N6.01	2b/4p	78.8	7
N6.02	1b	55.8	9.3
Seventh Floor	Type	GIA	External amenity space
S7.01	3b/5p	88.8	14.1
S7.02	1b	50.9	7.4
S7.03	2b/4p	71	7.4
S7.04	1b	50.7	5.4
S7.05	2b/4p	83	56.2
N7.01	1b	54.8	8.9
Eighth Floor	Type	GIA	External amenity space
S8.01	1b	54.8	30.8
S8.02	2b/4p	71.2	7.4
S8.03	2b/4p	71.5	7.4
S8.04	1b	50.7	5.4
S8.05	2b/4p	76.3	6

Habitable rooms total: 178

3.1.27

Overall mix

Type	No.	Percentage split
Studio	6	8.1%
1b	37	50%
2b/3p	22	29.7%
2b/4p	5	6.8%
3b/5p	3	4.05%
4b/6p	1	1.4%
Total:	74	100%

Of these units, 7 would be wheelchair accessible.

3.1.28

Affordable Housing proposal

- 20% affordable housing by habitable room with a 50/50 split between affordable rent and intermediate.

Amendments

3.1.29 The application was amended on 3rd February 2023, with the following changes made:

- The number of homes has reduced from 83 apartments to 75 apartments.
- 30% of the homes (measured by habitable rooms) are now designated as affordable homes.
- The building envelope has been significantly redesigned, with projecting balconies changed to 'inset' balconies and reducing the mass to the north of the site, improving the relationship with neighbouring homes on Rothesay Avenue.
- Roof terrace access and uses have been reorganised in response to the massing changes.
- Internal furniture layouts have been reviewed.
- At ground floor level changes have been made to ancillary accommodation, resulting from changes to the accommodation mix and the introduction of internal access to bin and bicycle stores.
- There has been further design development of the external materiality of the building, including the railway station entrance and canopy.
- The rationale for the new railway station entrance has been further explained.
- Further computer generated photomontage images have been produced, showing the proposals within the townscape.

22nd March 2023

3.1.30 On 22nd March 2023, 'VuCity' views of the proposed building were submitted, as requested by the Council's Urban Design Officer (VuCity is an interactive 3D mapping system which allows new designs to be inputted and visually represented).

28th March 2023

3.1.31 The application was further amended on 28th March 2023, to include the following changes:

- Updated Design and Access Statement, including CGI's picking up on various comments made by the design officer; Updated plans pack; Updated sections and elevations pack.
- Further brick detailing has been added to the 'body' of the development. Projecting horizontal brick courses have been added to the warm buff-brown brick, between the windows, above/below the pale cream balcony brickwork.
- For the north-facing flank wall, 'ghost' windows have been added to the pale cream vertical brickwork using the projecting soldier course brick types used on the building 'head'. The greening intended for the north-facing set-back buff brickwork to the rear half of the flank wall has been illustrated. This improves biodiversity and the outlook from the rear of the neighbouring property.
- The route to the bicycle store to the south core is simplified by removing the first lobby door between entrance and lift lobby. The lobbies are generous and easily manageable with bikes, with all doors 1200mm wide.

- The agent has added and expanded upon the Inclusive Access and Design section of the original DAS, illustrating all adaptable wheelchair M4(3) homes.
- The signage to the station has been amended. The green ceramic 'background' has been extended the full length of the canopy, so the 'Thameslink' sign is more clearly visible. The 'Wimbledon Chase Station' letters have been reduced in scale slightly. The CGI's clearly illustrate a retail signage strategy which would not conflict with the station building signage, although this would be subject to condition, as it is dependent upon the tenant.
- Updated Fire Statement – National Requirements & Updated Fire Statement – London Plan; with the following changes:
 - Potential provision for smoke shafts indicated.
 - Potential refuges shown in stair cores.
 - Some 1 bed apartments amended to move the hob away from the escape route.
 - Plant room door relocated to reduce escape distance.
- North core and roof level access/escape stairs enclosed to protect from the weather.
- Email (and associated attachments) from Ben Dawson at Curtins, in response to the transport and highways matters raised; and
- Letter from Hunters who are the applicant's agents appointed to identify affordable housing partners which summarises the progress to date.
- Visibility Splays at junction of Kingston Road and Rothesay Avenue submitted.

12th April 2023

3.1.32 The application was further amended on 12th April 2023 to change the housing mix, which has involved merging 2 x 1 bed units into 1 x 4 bed unit, reducing the overall number of units from 75 to 74.

3.1.33 The agent sets out a number of planning benefits they believe the scheme provides:

- A new station entrance
- Investment into Network Rail infrastructure
- Integrated internal Network Rail bin store to be created as opposed to using the station entrance.
- Off-street dedicated parking for Network Rail vehicles.
- Safeguarded future step free access to the station platforms.
- The new station entrance would be constructed whilst the existing entrance remains in operation, keeping impact on users to a minimum.
- 75 new homes, of which 30% are affordable
- 155.5sqm of new retail space (Officers note that this would replace the existing 246sqm of retail space – although in a more regular footprint)
- High quality infrastructure
- Re-use of scarce brownfield land
- New jobs during construction
- New Homes Bonus
- CIL and other obligations.

3.1.34 The application is accompanied by the following supporting documents:

- Accommodation Schedule
- Air Quality Assessment
- Arboricultural Impact Assessment
- Covering letter submitted 03/02/2023
- Daylight and Sunlight Assessment amended 03/02/2023
- Delivery and Servicing Plan
- Design and Access Statement amended 28/03/2023
- Drainage Assessment Report.
- Energy Report amended 03/11/2022
- Fire Statement – London Plan and National Requirements amended 28.03.2023
- Flood Risk Assessment
- Interim Travel Plan
- Noise and Vibration Impact Assessment
- Phase 1 Geo-Env Site Assessment
- Planning Statement
- Preliminary Ecological Assessment
- Step Free Access feasibility Study
- SuDS Report
- Transport Assessment
- Viability Report

4. PLANNING HISTORY

Application Site

4.1.1 91/P0778 - Outline application in respect of redevelopment of site by erection of single-storey station building and part 2/part 3-storey building comprising 5 shops at ground floor and 5 self-contained 1 bedroom and 2 self- contained 2-bedroom flats on upper floors and provision of 15 car parking spaces at rear with access from Rothesay Avenue. Grant Permission (subject to conditions) 13-02-1992.

4.1.2 18/P2211 - Demolition of existing buildings at 45-48 Rothesay Avenue and the erection of 11 self contained flats (2 x 2 bedroom duplex, 2 x 3 bedroom duplex, 5 x 1 bedroom and 2 x studio) within a four storey building, arranged over lower ground, ground, first and second floor levels. Grant permission subject to conditions 06/11/2018. (not implemented – expired).

Nearby sites of relevance

367 - 373 Kingston Road 1a-1c Rothesay Avenue

4.1.3 05/P0684 - Erection of a building ranging in height from one to five storeys containing a retail unit at ground level incorporating ancillary accommodation at mezzanine level, 12 x 2 bed and 2 x 1 bed flats on the upper floors and car parking at basement level accessed from rothesay avenue. Grant Permission Subject to Section 106 Obligation or any other enabling agreement. 30-08-2007.

363 - 365 Kingston Road, Wimbledon Chase SW20 8JX:

4.1.4 11/P0393 - Demolition of existing buildings & construction of a six storey building providing commercial use (a1, a2 or d1) at ground floor level and 9 residential units at first, to fifth floor levels, and associated car / cycle parking & storage. Refuse Permission 26-04-2011.

4.1.5 12/P0544 - Demolition of existing buildings & construction of a five storey building with two/three storey to rear providing commercial use (a1 - a3) at ground floor level with parking; cycle and refuse. 8 x residential units at 1st - 4th floor. Grant Permission Subject to Section 106 Obligation or any other enabling agreement. 31-03-2014.

N.B There are a number of 5 storey buildings in the locality, each with planning history but they are not all listed in this report.

5. CONSULTATION

5.1.1 The application has been advertised by major notice procedure and letters of notification to the occupiers of neighbouring properties (166).

5.1.2 In response to the consultation, 145 letters of objection were received.

The letters of objection raise the following points:

Visual impact

- Building is too tall and would be out of keeping with other buildings in Wimbledon Chase. Suggest no more than 5-6 storeys.
- Building would be visually imposing and an eyesore. Also an eyesore on the Merton Park landscape.
- The station does not need to be 'landmarked'.
- Granting permission would set an undesirable precedent.
- High rise buildings are inherently flawed.
- The context of the scheme adjacent to the conservation areas at Quintin Avenue/Richmond Avenue means that the height and mass of the scheme need to be significantly reduced to be more in keeping with the area.
- This area is not suitable for tall buildings.
- The open space to the front of the building would be lost and the local vicinity would feel more overcrowded.
- The current design of the new station entrance really differs from the current spacious layout and historic Art Deco design and this really must be addressed in revised plans.
- Whilst the current entrance in the station is not great, the proposed entrance is much less inviting. The proposal for a utilitarian low height corridor, which is longer than the present day entrance is also not an improvement.
- The design of the scheme is at best "a nod" to Art Deco design but is really just poor quality commercial architecture.
- Retail unit would increase litter.
- Insufficient soft landscaping.

Affordable Housing

- The target for affordable housing should be at least 35% and up to 50% under the London Plan.

- The failure to provide any affordable housing is not acceptable.

Impact on neighbouring amenity

- Loss of daylight and sunlight to neighbouring properties.
- Loss of privacy.

Transport/highway issues

- Inadequate parking provision and increased demand for parking.
- Increase in congestion.
- Access concerns for service and delivery vehicles, which would be increased by the proposed development.
- The site has no space for delivery of construction materials or plant.
- Vehicles currently use the station forecourt to turn, which would not be possible with the proposed layout.
- New loading bay would be dangerous especially being in front of the bus stop would make it more difficult and dangerous for bus drivers to re-join traffic when their front view is blocked by a lorry.
- This new loading bay location proposal has also not considered how the unloading will take place as between the bus cage and the corner of Rothesay Avenue is occupied with three trees, a lamppost and six bicycle stands.
- The proposal to re-position the lost on-street parking bays on Rothesay Avenue does not work because residents at St. George's Court (corner of Kingston Road and Rothesay Avenue, opposite the site) will lose the turning circle to enter and exit the underground car park.
- The proposed new station entrance and exit will result in train passengers coming out in front of the bus cage where bus passengers will be waiting for the busses. This is a serious health and safety concern as in any event of a fire or medical incident, Paramedics or Firemen will not be able to easily access the station via this constricted new entrance. Moving and narrowing a station entrance does not serve this community in the best way for the future.
- No space for taxi drop-off.
- Loss of on-street parking as blue badge spaces would be provided on the street as opposed to on the site.
- Loss of on-street parking bays due to provision of Network Rail access and loading bay.
- Concern that existing bus stop would be adversely affected.
- If permission is granted it should be on the basis that the station remains open throughout the construction process.
- If permission is granted the construction process should minimise the adverse effects as much as possible.

Standard of accommodation

- Some of the units appear to be single aspect, which is unacceptable.

- Studio flats are not appropriate with more people working from home, needing an office space.
- Flats proposed are too small.
- The residential units have a utilitarian front entrance from the street and their internal access is down narrow and 'mean' corridors.

Future step free access issues

- The developer should be required to make a CIL payment to cover the costs of step free access.
- Step free access should be a requirement for any redevelopment of the station.
- Concerns that CPZ parking bays would be lost due to creation of a new pedestrian access on to Chaseside Avenue (part of the future step free proposals).
- New pedestrian entrance for future step free access at Chaseside Avenue would exit onto a pavement of substandard width, adversely affecting road safety.
- The station platforms themselves would need to be raised as they are below the level of the floor of the trains.
- The “drop off” zone pictured in front of the new entrance is earmarked as a loading bay in the transport report (with 2 existing parking bays relocated to Rothesay) so that seems misleading.
- Step free access is likely to be provided in the near future notwithstanding this proposed development.
- There is still no feasibility study for the railway’s preferred option so the question of how much it will cost and how it will be constructed (if at all possible) remains unanswered.

Flooding and drainage

- The application form states that the new development is not at risk of flooding. This is not the case; it is at risk of flooding. The groundwater risk is high and the presence of the aquifer underneath the station is of significant concern, as indicated by the Environmental Agency report of 22nd July 2022 as the proposed piling depth for the foundations of a 9-story building means that aquifer is at significant risk of contamination not to mention disturbing the aquifer which could affect the railway embankment.
- There have been flooding incidents in the past.
- Concerns that sewage system could not cope with additional burdens - St George’s Court, we were not allowed by Thames Water to allow our wastewater to go straight into the sewers because they are Victorian and they cannot cope with the volume of sewer from our 14 flats (12 x 2 Bedroom 2 Bathroom and 2 x 1 Bedroom Flats).

Other

- The density of the proposed development is too high.
- Schools in the area cannot accommodate an increase in pupils that would

increase as a result of this scheme.

- Impact on infrastructure and services locally (schools, green space, water, gas, electricity, dentists, GP surgeries, sewage, drainage, social services).
- Failure to meet housing mix policies. More family housing is needed.
- No need for further retail units.
- Change in social dynamics from a local area full of sociable families to an anonymous existence.
- No information on proposed substation.
- Refuse and re-cycling provision appears inadequate.

5.2 Following amendments to the scheme on 02/03/2023 there have been a further 16 representations, raising objection on the grounds set out above. There is a total of 161 objections to the proposal.

5.3 **Merton Park Ward Residents' Association**

MPWRA is the residents association for Merton Park Ward which includes the south side of Kingston Road directly opposite Wimbledon Chase Station. Many of our residents use the shops along the Chase and of course the Station. Our findings are as follows, including the lack of step-free access to the station within the plan (point 5):-

1. The proposed development is out of keeping with the nearby Wimbledon Chase Conservation Area. The impact of even a 4-5 storey building due south of the houses on the west side of Rothesay Ave is massive, and the massing of the proposed new build is completely overbearing to properties of domestic scale in the surrounding streets to the north of Kingston Road.

We believe this contravenes Merton's Local Plan Policy CS14 which states "...all development to be designed to respect , reinforce and enhance the local character of the area in which it is located..".

Similarly, this development must be determined against the requirements set out in Merton Sites and Policies Plan DMR1 for local parades of shops, which stipulates that the Council will support development commensurate with their scale and function, and where it respects or improves the character and local environment of the area. In our view, this development signally fails to meet either of these measures.

2. As always, the applicant has produced a viability assessment saying that affordable housing would be uneconomic. This should be re-assessed by the council's own independent consultant. The Local Plan requires 40% affordable housing.

There is little point in Merton having policies about the provision of affordable housing in new schemes if this block of 83 units is permitted to go ahead without the required 40% as 'affordable'.

3. Permission, if granted, for a 9 storey building at The Chase Station will be seen as a precedent for other developments along the road east from the station, which is already becoming quite a canyon. Precedents should similarly be avoided for high rise applications on other residential street corners.

4. The Town Planning Statement by Davies Murch lays much weight on the fact that the (high rise) proposal is in line with LBM's policies for town centres. Wimbledon Chase is a Neighbourhood Parade, not a town centre. There are other references mis-using Town Centre policies.

5. Despite Network Rail, TfL and Merton policies, this proposal does not include step-free access to the station platforms. The long study, starting on page 42 of the Planning Statement, explores various options for lifts, but these are totally independent of the current application. On page 8, 5.2 the conclusion is that it is prohibitively expensive to provide access to the platforms as part of these proposals. The options show how it could be done but say NR is applying to the Govt. for funding.

Given that this is a station site, station requirements should be prioritised. Neither Network Rail, TfL nor Merton should consider any application for this site that does not include, within its design, step-free access to the platforms. Ideally a lift should be sited in the development so that it has the dual purpose of providing access to the flats and station platform.

Failing that, an application like this provides the perfect opportunity to leverage funding from the developer. Such funding requirement should be commensurate with encouraging the developer to re-examine the viability of including step-free access within the plans. The external alternatives suggested are considerably less user-friendly than a lift within the development.

6. It is suggested that a high rise building would be a landmark to guide travellers to the station. There is a rather dominant iron (box girder?) bridge across the main road which provides sufficient in terms of way finding.

7. The south east of England is the driest part of the UK and thus the provision of 83 additional units (and therefore, potentially, say 130+ extra people) places extra demand on already stretched natural resources. Adequacy of Water, electricity, drainage and all social infrastructure including the NHS and schools must be discussed with the relevant authorities in respect of this and all applications as they occur.

8. Of the 83 flats, only 32 are dual aspect. Local Plan policies say flats should not be single aspect. This may not be an issue where a few flats do not comply but, in this case, the majority appear to be single aspect.

9. The housing mix of the 83 units is dominated by one bed flats, when Merton's housing needs assessment calls for equal proportions of one-, two and three-bedroom units.

10. The distance between the windows of the new development and the properties in Rothesay Avenue is only 12m. That means they will be eye balled not only directly across but also from all the storeys above.

11. There appears to be no provision for deliveries to the flats, apart from finding somewhere to park on Kingston Road, Chaseside Avenue or Rothesay Avenue (both Chaseside and Rothesay are very narrow).

12. Bin storage looks inadequate for 83 flats. There are already similar problems in the immediate area and this is causing fly-tipping.

13. The Environment Agency has written concerning the presence of an aquifer on the site. It seems unwise to build a nine-storey block over an aquifer. Also, burrowing into the railway embankment, which was one of the

off-plan suggestions for giving step free access, could destabilize the embankment, but the more so because of the aquifer.

We believe this application should be refused

5.4 The John Innes Society

This site is near the John Innes Society's Area of Benefit and the proposed development would be very visible from it.

If this application is approved, then it will be very difficult for the Council to enforce its Planning Policies elsewhere. Any number of difficult precedents will have been set.

1) Policies require good design which respects and enhances the character of the area. Wimbledon Chase is a predominately two storey residential area with some slightly higher buildings allowed fronting Kingston Road. A nine-storey block would be completely out of character and dominate the local domestic scale. Wimbledon Chase shops are a local parade and not a Town Centre, so quoting Town Centre policies is misleading.

2) No one could claim that the rear view of the block is good design. It's a hotchpotch of protuberances.

3) The pre-application responses made it very clear that if development takes place at the station, it MUST include step free access to the platforms. We understand this is Network Rail policy. In receipt of donations from It is unacceptable to conclude, as para 5.2 of Davies Murch's Town Planning Statement (page 8) says "it is prohibitively expensive to provide accessible access to the platforms as part of these proposals". Costings and land acquisition price should take into account the expenses they must cover. They seem very vague about finance anyway, saying in the application form that the costs of the development will be between £2m and £100m. Their alternative routes for providing step free access create long and tortious routes, away from the station entrance. From Rothesay Avenue, land would have to be acquired, possibly by CPO. From Chaseside Avenue, burrowing into the embankment could cause it to subside, especially as we now know there is an aquifer and vulnerable groundwater. The obvious site for a lift, in the station, will be lost if this development is allowed to proceed.

4) For a project of this size, Merton's policies expect a 40% provision of affordable housing. These developers plead poverty and say they cannot provide any affordable housing.

5) Merton's policies require units to be dual aspect. In this proposed development of 83 flats, only 32 have dual aspect. The recent heatwave has shown why Merton's dual aspect policy is absolutely right and to ignore it would be to create unacceptable living conditions for future occupiers.

6) The proposed flats, all of them smaller than three bedrooms, do not meet Merton's needs for a balanced mix of housing sizes.

7) The separation distanced from the windows of this proposal across to the houses in Rothesay Avenue, is only 12m. That would result in overlooking and loss of privacy.

8) The servicing requirements for 83 flats, both for deliveries and collections, are inadequate. The same applies to station maintenance.

9) Refuse and re-cycling storage appears to be inadequate, especially

bearing in mind that with such very small units, residents will not have much storage space within their flats.

10) Sustainability appears to have been given short shrift. It will be interesting to see what Merton's Climate Change officers have to say in that respect. e.g. the roof top outdoor area will be too hot in summer and too exposed at other times of the year and on-site power generation is minimal.

One could go on listing the numerous shortfalls of this application, but we hope we have covered the main points.

We trust the application will be refused.

5.5 The Wimbledon Society

Demolition of the existing entrance to Wimbledon Chase station and adjacent property and the erection of a 4 to 9 storeys building: 83 residential units (6xstudios, 56x1 beds, 21x2 beds) with retail on the ground floor with parking, refuse arrangements and plant and a new station entrance.

The Wimbledon Society objects to the above application on a number of grounds.

Addressing the Station, any new development encompassing an existing station should be improving the station facilities to encourage the use of public transport rather than discourage them which this development will do. The stylish, albeit neglected, 1920's frontage with the circulation area for pedestrians would be a considerable loss to the area. While the current entrance within the Station is not great, the proposed entrance is much less inviting as well as dreary. The proposal for a utilitarian low height corridor which is longer than the present day entrance is also not an improvement. Any design for the Station should provide adequate facilities for station staff. There is no sense of an inviting local transit hub in the proposal and there is no widening out and gathering space which one would expect at the front of a Station. There is no pedestrian space provided for interaction with the bus stop, no space for taxi set down and where are the facilities for the disabled? Within the Station, step-free (ie lift) access to platforms is shown as alternative designs in an accompanying report, but step-free access is not included in the actual proposals. They should be.

The maximum height of development in the vicinity in Kingston Road is 5 storeys and in the immediate proximity is 2 storeys in Rothesay Avenue and on the other side of the railway line in Chase Side Avenue. Therefore a building of 9 storeys is significant over-development and out of scale with the locality. Furthermore the location does not appear to be identified in the Local Plan as being suitable for a "higher building" defined by Merton Council as being 6 storeys and over.

The 83 residential units have a utilitarian front entrance from the street and their internal access is down narrow and mean internal "hotel type" corridors. 57 of them are single aspect.

It is the view of the Wimbledon Society that any development of this site should be limited to 5 storeys, certainly no more than 6. There should be no single aspect flats. Any proposals should retain the current set back pedestrian space to give character and presence to the entry to the Station. The entrance to the Station needs to be higher, thus less threatening, and preferably with shop frontages facing onto it for interest. There needs to be a more direct and wider route to the platforms and the lifts should be fully incorporated in the development.

5.6 Internal Consultees:

5.6.3 LBM Transport Planning (15/12/2023)

The proposed development would involve the demolition of the existing station entrance and nos. 45, 46, 47 and 48 Rothesay Avenue, construction of a new building comprising a ground floor 150sqm retail unit and 83 residential flats above, on first to eighth floor (6 x studio units, 56 x 1 bed units & 21 x 2 bed units), associated vehicle and cycle parking, refuse and plant. A new station entrance would be provided prior the demolition of the existing entrance.

PTAL

The site has a Public Transport Access Level (PTAL) of 3, on a scale ranging from 0 to 6b where 6b represent the highest access to public transport

Controlled Parking Zones (CPZ)

The site is located in a Controlled Parking Zone (Zone RPS) where parking and loading is controlled from Monday to Friday between 8:00am – 6:30pm.

Car Parking

A car-free scheme is proposed except for three Blue Badge car parking bays, provided on-street on Rothesay Avenue adjacent to the residential core entrances.

Specific car parking standards relevant for this land use and site location (outer London with PTAL of 3) are a maximum of 0.75 spaces per unit. Policy T6.1 also identifies that 3% of parking should be for blue badge holders and applications should demonstrate how an additional 7% can be accommodated should demand increase in the future.

Permit free can be considered however the Council will carry out a consultation exercise for the extension the Controlled Parking Zone to include Saturdays.

The Council would seek a commuted sum of £45K to investigate, consult and implement an extension to CPZ scheme.

Disabled Parking

The development should provide the disabled parking provision within the development site.

On street disabled parking could only be considered on request by an individual occupier and should satisfy the Council's adopted criteria.

Servicing and delivery

The proposed loading/unloading bay as shown on Kingston Road (A238) to provide servicing facilities for the commercial and residential elements of the development is unacceptable due to following:

- There is a high demand for the two parking bays identified and the Council would not agree for relocation to Rothesay Avenue.
- Adverse visibility to the right for those traffic emerging from Rothesay Avenue.
- Intrusion onto double yellow lines.
- Removal of cycle parking bays. (this area is identified for a cycle hire scheme and

will be occupied by 2 operators in January 2023

Servicing and refuse collection to be undertaken within the application site.

The applicant to demonstrate by use of swept path analysis how the service vehicles would enter and leave the site in forward gear.

Sites and Policies Plan DMT3 car parking and servicing standards

g) New development or modification to existing development should make proper provision for loading and servicing in accordance with Freight Transport Association (FTA) guidance, except when a development would impact on a listed build designated conservation area then facilities will be considered on case by case basis.

The London Plan 2021 – Chapter 10 Transport

G. Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

Cycle Parking

It is supported that 132 long-stay and 4 short-stay cycle parking spaces will be provided to the residential units in line with Policy T5 of the London Plan.

The location of bicycle and bin stores on the ground floor are compromised and inconvenient for residents.

The bicycle store for the north core is accessed via the street only and the bin store for the south core does not open directly to the street and access is through a long corridor that is shared with the bike store.

Car Club

Car Club membership should be provided to residents on initial occupation for a 3-year period.

Travel Plan

A Framework Travel Plan (TP) has been submitted with the application and the targets and measures proposed to promote sustainable and active travel are acceptable.

The final TP should be secured, enforced, monitored and reviewed by the applicant as part of the s106 in line with LP Policy T4.

A sum of £2,000 (two thousand pounds) is sought to meet the costs of monitoring the travel plan over five years, secured via the Section106 process.

Recommendation:

Until the above issues (identified at Pre-app) have been clarified I am unable to comment further on this application.

5.6.4

LBM Transport Planning (31/01/2023)

Breakdown of 45K

- Informal Consultation- 5,000k
- Statutory consultation -3,000k

- Carry out Works - ----- 30.000k
- Staff Time ----- 20% x 38000k

Total- 45,600k

Servicing and delivery

The proposed loading/unloading bay as shown on Kingston Road (A238) to provide servicing facilities for the commercial and residential elements of the development is unacceptable due to following:

- There is a high demand for the two parking bays identified and the Council would not agree for relocation to Rothesay Avenue.
- Adverse visibility to the right for those traffic emerging from Rothesay Avenue.
- Intrusion onto double yellow lines.
- Removal of cycle parking bays. (this area is identified for a cycle hire scheme and will be occupied by 2 operators in January 2023)
- Servicing and refuse collection to be undertaken within the application site.
- The applicant to demonstrate by use of swept path analysis how the service vehicles would enter and leave the site in forward gear.

Sites and Policies Plan DMT3 car parking and servicing standards

g) New development or modification to existing development should make proper provision for loading and servicing in accordance with Freight Transport Association (FTA) guidance, except when a development would impact on a listed build designated conservation area then facilities will be considered on case by case basis.

The London Plan 2021 – Chapter 10 Transport

G. Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

5.6.5

LBM Transport Planning (11/04/2023)

Servicing

Regarding the cycle hire scheme, the allocated parking on the footway is not subject to a consultation so it will not be on the website. The ones on the road do require a statutory consultation hence the info on the website about Wimbledon Bridge. The area is being geofenced for now, so the bikes are likely to appear end of March, early April 2023. Eventually a plan showing all the cycle parking bays on and off the footway will be available on the website

With regards to the loading bay and mimicking Sandringham Ave – we do get complaints about sightlines and near misses when there is a high sided vehicle within the loading bay, hence one that we try to avoid rather than mimic

The existing loading bay at Sandringham Ave is approximately 20m and it does get occupied by other vehicles. The proposed loading bay is 17.5m. are they confident that a service vehicle can get in and out whilst navigating the build out.

Although the applicant refers to very small commercial unit, regrettably it is not the size of the unit but the size of the vehicle that will be servicing the unit. There are many instances where the units are very small but due to cost effectiveness, particularly if the unit is part of a chain, they use 16m service vehicles that causes huge problems. Again, this is something that we need to avoid as we need to be realistic and practical – clearly the unit needs deliveries but because of their service delivery arrangements and agreements it makes it extremely challenging for both the unit and the Council as the traffic and the Highway authority.

An agreement can be reached for the commercial unit to use a smaller vehicle – no more than 10m

Also, when unloading (assuming trollies will be used), how are they planning to navigate all the street furniture along the length of the footway where they are proposing a loading bay

With regards to a disabled parking bay, the proposal involves converting 2 permit holder bays and a motorcycle bay, all of which are in use. Each disabled parking bay must be 6.6m and there is insufficient space to accommodate 3 disabled bays as proposed. The number of parking bays for the existing residents is already insufficient. Residents pay a fee for their permits and as it is they find it difficult to find a space. The proposal for disabled parking bay for the development would be extremely unfair on the residents who pay for their permit and three proposed bays is unachievable. Also, it is not possible to allocate disabled parking bays on the public highway purely for residents and because it is within a busy area with shops etc, it is likely to be occupied by those blue badge holders visiting the area. This is a common complaint we receive from town centres and outside shopping parades.

In terms of sightlines, as previously stated and as per Highway code, we try to remove parking within 10m of a junction and in some locations more so based on the geometry of the road, activities, speed and volume. Historical locations and restrictions should not be used as an example as more often than not, there are issues, concerns and complaints that the Council regularly deals with. The idea is to prevent future problems.

Recommendation: Inadequate Servicing

The proposed development does not make adequate provision for the loading and unloading of goods vehicles within the site and would, therefore, encourage such vehicles to park on the highway, with consequent additional hazard to all users of the road.

Further queries from the planning officer to Transport Planning:

- Do you have any information on the accident history for the junction at Sandringham Avenue and Kingston Road?

Any decent engineer would acknowledge that a high sided vehicle close to a junction causes sightline issue. If they want to have the accident data they can ask TfL however this would only be personal injury accidents; however, this is about level of risk and the complaints the Council receives regarding sightline issues and near misses etc. it is a risk that we attempt to reduce and not encourage.

- You had indicated that an agreement could be reached for vehicles no longer than 10m. Therefore, could the lay-by be a solution if they can demonstrate access by way of a swept path analysis and details of how trollies would negotiate on-street furniture and also a condition limiting vehicles to no more than 10m length?

We can only assess this once the plan is drawn and sightline and swept paths are shown. They also need to consider the length required for the service vehicle rear platform and area they will be using when unloading / loading on to trollies. I really cannot see how it would not interfere with the bus stop and before you ask, the bus stop cannot be moved further back

- In terms of the cycle hire scheme – whilst there may not be a plan online, is there any plan to show the location of this so we can understand how the development would impact this proposed cycle hire parking?
see the red area. We are also considering the section where there are cycle hangers between the tree and the lamp column



- You mention that there are complaints about the sight lines at Sandringham Avenue – is there a specific standard that you are working to?
Each location is assessed on its merit as they are a number of factors that need to be considered including speed and volume of traffic and the geometry of the road.
- You state that the disabled bays must be 6.6m in length and are not acceptable – but the plans show the spaces to be 6.6m in length, so I am not clear on the concern here?
Concerns are that this would involve the removal of permit holder bays which residents pay a high price for a permit and this area is already at over capacity; the Motor cycle bay is in use and we would not want to disadvantage those who had requested it and are using it; and being in a busy shopping parade, the disabled bays will be used by other blue badge holders.
- Do we have any information on demand for disabled parking bays that could tie into/support resisting the on-street disabled parking?
Disabled bays are introduced after a resident applies and qualifies for a disabled bay. These would be used by visitors – we have a similar situation in Raynes

Park where the blue badge holder cannot use the disabled bay he applied for as visitors use the disabled bay for most part. And we do not want to be in a situation that these bays are in use by those not associated with the development and then those moving into the development applying for disabled parking bays which would mean removal of more permit bays.

- Can we support there being insufficient parking for existing residents with any evidence base?

It really is not up to the Council to provide evidence or justify our comments in such detail. Our comments are based on the on going complaints we receive due to lack of parking for permit holders. Feel free to contact Parking services who can provide you the number of permits issued and you can count the number of parking bays along the road. Also you need to be mindful of the residents' visitors who can park whilst displaying a visitors permit and we do not hold information on these. These often results in complaints from residents and to now agree what effectively puts residents at more of a disadvantage whilst accommodating the development.

- The issue of the loss of a motorcycle parking bay has not been raised before – could you clarify where this space is?

The road markings are worn and Parking Services will be refreshing it



5.6.6

LBM Waste Services (05/09/2022)

Looking at the submitted plan/proposal, I do not see any concern to escalate as this looks good. My only concern will be to colleagues in highway/parking services - Parking down Rothesay Avenue is a nightmare at the best of time, with complaints from residents/ward Cllrs very often.

The standard 26ton waste collection vehicle has the following dimensions below. It is required that sufficient room is allowed to manoeuvre and load a vehicle of this size, the vehicle will not reverse into the road:

- Length = 11 metres
- Width = 2.5 metres
- Height = 3.5 metres

· Turning circle = 18.0 metres

Before considering additional properties, it is worth noting these concerns and adapt measures to address them.

5.6.7

LBM Urban Design Officer (amended scheme 17/02/2023)

The applicant has revised the submitted scheme and has addressed previous design comments. Please note that there may be repetition from our previous design comments to ensure that they can be read independently. For clarity, the following comments have been made in conjunction with the following revised documents:

- DAS Amended 03.02.2023
- Daylight and Sunlight Assessment 03.02.2023
- Plans Amended 03.02.2023
- Sections and Elevations Amended 03.02.2023
- Site Plan Amended 03.02.2023

The Council support this site coming forward to provide homes. The site includes Wimbledon Chase station (PTAL 3 and Zone 3) and forms part of a local parade on a major corridor therefore it is suitable for optimised development.

The site is less than 0.25 ha in size and is considered a small site. Merton's [Small Sites Toolkit \(SSTK\) SPD](#) provides good practice design guidance with checklist and a Design and Access Statement template to assist in small site developments.

Building heights / massing.

The applicant has revised the scheme. The proposal now steps from 9 storeys towards Kingston Road to 3 storeys to the north creating a better relationship with the neighbouring 2 storey houses.

A building of 9 storeys would be considered a tall building as per the London Plan and the emerging Merton Local Plan definition which is '*a minimum of 21m from the ground level to the top of the uppermost storey*'. Currently the proposal is circa 29m from ground level. The emerging Merton Local Plan does not allocate this site as 'appropriate for tall buildings' and it is important to note that an optimised development does not always necessitate a tall building. However, given the site uniquely forms part of Wimbledon Chase Station and is located on a major corridor there is potential to achieve an high density scheme that is taller than its surroundings.

Although the overall height of the building has not changed, the amended material pallet are supported. The change of material and massing between the 'head' and 'body' of the proposal creates a more visually slender building towards Kingston Road.

Due to the scale and height of the building in this specific context the proposal will be viewed from all angles. The applicant has clearly acknowledged that the primary view of the building is from Kingston Road marking Wimbledon Chase entrance, however the proposal when viewed from the north takes on an entirely different character that is boxier in its articulation and feels heavier and dominant in its appearance. It is clear that the character of the building, particularly the 'head', has taken influence from the art deco style of neighbouring buildings and proposes a contemporary interpretation of this which is supported. The 'body' and 'rear' of the proposal would have benefited from using architectural elements that have been implemented on the 'head' of the scheme, such as brick detailing, to create more consistency across the development whilst allowing them to take complementary characters.

The softening of the form, revised material pallet and brick detailing has improved many of the views, however the view looking north-east along Kingston Road still feels too long and slab like which creates an overbearing appearance. A slightly reduced massing to the rear of the top two levels would have been beneficial to allow the top of the building to appear more settled and less dominant.

The 3 storey flank wall directly faces onto the adjacent properties. It would benefit from either brick detailing, such as banding, ghost windows or similar, or softening with vertical greening that is suitable for this north facing location.

Character and quality.

The applicant has made significant changes to the internal lay-outs of the homes which is supported. The previous revision had separated kitchens with no access to natural light which was unacceptable.

The proposed building arrangement of a linear block with double-loaded corridor results in a high percentage of single aspect homes. As per London Policy D6, housing development should maximise the provision of dual aspect homes. Although the applicant has step backed a portion of each dwelling to improve outlook of the homes, this does not constitute a 'dual aspect' home, as per the draft London Housing Design Standards LPG that states

'A dual aspect dwelling is one with opening windows on two external walls, which may be on opposite sides of the building or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building... The design of the dual aspect dwelling should enable passive/natural ventilation across the whole dwelling. The provision of bay windows, stepped frontage, shallow recesses, or projecting facades does not constitute dual aspect.'

Therefore, the applicant should demonstrate how homes enable passive/natural ventilation and avoid overheating.

The plans show social rent and shared ownership all accessed from the north core which could assist with managing these homes effectively. The design of the shared circulation has a single lift for both south and north core, and a door that connects the two cores. Can the applicant confirm that the door between cores will remain openable at all times to ensure free movement of travel by residents in case of a broken down lift and for all residents to use shared communal spaces?

Providing communal roof terraces are welcomed as they provide much needed spaces for resident to meet and socialise and the opportunity to provide biodiverse planting. The plans have indicative lay-outs only. I suggest that the landscape design of all communal spaces is set as a condition to ensure the quality of these spaces.

The revised material pallet and detailing is welcomed. In particular the horizontal banding that flows between brick detailing, balustrade design and window transom is supported. I suggest that a mock up panel of the façade that shows the brick cladding and detailing, glazing with aluminium panels and balustrade detailing is reviewed as a condition to ensure the quality of the architecture reflects the ambitions of the application.

The route to the bike store for the south core is convoluted and would benefit from direct access from the street similar to the north core arrangement. Cyclists using the south core store are expected to negotiate 4 different doors and turns and push bicycles through the lobby and passed the lift to store their bicycles. On a wet day this would create a hazard. Bicycle stores should be located to be as convenient as

possible.

As per the Housing SPD 2016, homes entered from the seventh floor (eighth storey) and above should be served by two lifts. However, the ninth storey is currently served by one lift only. It is unclear whether the amount of lifts are appropriate given the height and level of occupancy expected in this development. As per the London Plan Policy E5, the Design and Access Statement should include an inclusive design statement, however this is not included.

The Fire Statement (National Requirements) drawings in appendix A are missing. The Fire Statement (London Plan) are of the previous scheme. Furthermore, both reports state that 'As the building is above 18 meters, and the area of the floors within the building is more than the set criteria of 900m² within BS 9991, it is required to be provided with two firefighting shafts.' Can the applicant please clarify the status of providing single lift access to the 9th storey and whether this is compliant and reflected in the Fire Statements.

Station and retail unit

The new station entrance is well integrated with the building design which is supported. The canopy that spans from the station entrance through to Rothesay Avenue is particularly successful in creating a prominent station approach from the east that leads you directly to the entrance.

The signage design needs further exploration. In terms of graphic hierarchy, the bold green 'Wimbledon Chase Station' can create confusion and misdirect you to the corner of Kingston Road and Rothesay as the 'Thameslink' sign is less bold and currently lost on the pale brick. A more uniform approach may be more suitable.

Furthermore, the applicant has not provided any information on how signage for the retail store is to be implemented. [Merton's Shop Front Guidance SPD](#) provides best practice approach for shop front design. Careful consideration must be given to ensure that the different signs do not compete with each other and instead complement each other with a clear visual language.

The retail unit appears shallow with no area for storage or commercial waste. Does the applicant have an operator in mind to take on this space? The applicant has provided no information on servicing, delivery or waste strategy for this retail unit.

The applicant has not provided any information on what the communal facilities are for residents on the ground floor.

The applicant has provided a report to show how step-free access could be accommodated in the future, however does not commit to providing it within this proposal. With the significant increase in density, step-free access would have been acknowledged as a much needed public benefit.

The applicant has provided a report to show how step-free access could be accommodated in the future, however does not commit to providing it within this proposal. Considering the proposed significant uplift of density from 4 dwellings per ha to 83 dwellings per ha, it is expected that there is a level of public benefit such as step-free access to the station, however this has not included as part of this application.

5.6.8

LBM Urban Design Officer (original scheme 20/10/2022)

The Council support this site coming forward to provide homes. The site includes Wimbledon Chase station (PTAL 3 and Zone 3) and forms part of a local parade therefore it is suitable for optimised development.

The site is less than 0.25 ha in size and is considered a small site. Merton's Small Sites Toolkit (SSTK) SPD provides good practice design guidance with checklist and a Design and Access Statement template to assist in small site developments.

The Design and Access Statement is light on detail and contains little design justification or evidence of using a design-led approach as per the London Plan. Additionally, there is little information on the outcome of consultation, in particular the events with the public. Due to the complexity and the significance of the site, we would expect the Design and Access statement to be more thorough. The SSTK SPD provides a DAS template.

Building heights / massing.

- The proposal steps up to 9 storeys towards Kingston Road and steps down to 4 storeys towards the 2 storey homes on Rothesay Avenue.
- As stated in London Plan Policy D3 'Optimising site capacity through the design-led approach', optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The council support a residential led scheme on the site, however the proposed 9 storey building is not the most appropriate form for the site. A building of 9 storeys would be considered a tall building as per the London Plan and the emerging Merton Local Plan definition which is 'a minimum of 21m from the ground level to the top of the uppermost storey'. The emerging Merton Local Plan does not allocate this site as 'appropriate for tall buildings'. An optimised development does not always necessitate a tall building.
- In principle, the stepping down from a taller element addressing Kingston Road towards the existing 2 storeys homes on Rothesay Avenue is supported, however the existing articulation of the massing feels unresolved, fussy and overbearing and as previously stated the current massing of the proposed 9 stories does not feel appropriate for the site. This is particularly demonstrated in fig 10.3 'View looking south from Rothesay Avenue' from the DAS where it has a major impact with harmful effects on the existing quality of townscape and where the proposal feels like the rear/back of a building. The applicant has not acknowledged that a proposal of this scale and height will be viewed from all angles, from the street and the station platform level. The applicant has not demonstrated that all of these viewpoints were considered.
- The street view fig 10.4 'Street view looking north east from Kingston Road' from the DAS appears overbearing. The 9 storey massing is long in elevation and provides no transition from the neighbouring 2 storey homes (391 Kingston Road and beyond). A more slender form would be better suited to create a 2 building that marks the station. Furthermore, the applicant has not provided a convincing argument for why the height is what it is and why it should be placed towards the station rather than the corner of Kingston Road and Rothesay Avenue.
- The applicant has not clearly demonstrated the visual impact the proposal has on the quality of the amenity of the existing neighbours.
- Little information has been provided to assess the visual impact of the proposed massing. The applicant has provided 4 close range views of the proposal within the DAS, however a townscape analysis using mid and long views are required to further assess the proposed massing and its impact on townscape.

Daylight and sunlight

- The daylight and sunlight report shows that many existing neighbouring homes will be significantly impacted from this development with a reduction of Vertical Sky Component, daylight and sunlight. As stated in London Plan Policy D6(D), the design

of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

- The daylight sunlight report explains that the impact of the development is being assessed against what is described in the Draft SPG 'Good Quality Homes for all Londoners' that suggests that residential properties in Central London can typically expect VSC values of between 13% and 18%. This is an unacceptable approach to assess against as this is a PTAL 3 site in zone 3 and not central London. The sites character and local distinctiveness is predominately low rise and located near a local parade in a suburban context – its existing character, heights and density is very different from central London.
- Furthermore, the draft SPG (as referenced in the daylight and sunlight report) states 'consideration of the retained target VSC should be the principal consideration. Where this is not met in accordance with BRE guidance, it should not be less than 0.8 times its former value (which protects areas that already have low daylight levels).' It is evident from the daylight and sunlight report that the impact of the development is significant with many existing homes receiving less than 0.8 times their former values.
- It is also evident from the daylight and sunlight report that within the proposed development the kitchen has not been included within the calculations for the proposed homes. Whilst the council acknowledge that this has been proposed as a separate room, it is still considered a habitable room as per the London Plan glossary and therefore should be afforded the same treatment and be included in any daylight and sunlight assessment. London Plan text under Policy D5 states 'The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy and daylight, and that the orientation enhances amenity, including views.' Not providing daylight and views for all habitable rooms is unacceptable and create poor quality homes.
- Within the council's SSTK SPD, 'New homes should achieve a minimum Average Daylight Factor target value of 1% for a bedroom and 1.5% for a living room. (7.1.17)'. Within the daylight and sunlight report the majority of rooms fall short of this target with many rooms achieve 0.0 ADF.

Character and quality.

- As stated in the London Plan Policy D3, developments should 'respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character'. The site is a significant and prominent corner and a station entrance. The DAS contains very little information on what character analysis was produced and how this has influenced and informed their design.
- The applicant has proposed a separated and enclosed kitchen within the majority of the homes. As mentioned above, a kitchen is considered a habitable room in the London Plan, and therefore it is critical that if they are a separate room that they have access to daylight/sunlight and a view. The current flat arrangement creates deep units with windowless and separated kitchens. This is unacceptable.
- The proposed building arrangement of a linear block with double-loaded corridor results in a high percentage of single aspect homes, many are borderline north facing. As per London Policy D6, housing development should maximise the provision of dual aspect homes. The applicant has not demonstrated 3 whether more appropriate design solutions have been tested and why these were disregarded. Furthermore, the

single aspect homes facing south must demonstrate that they do not overheat.

· The applicant has proposed rooftop communal amenity spaces and communal facilities on the ground floor. Whilst this is supported, the applicant has not shown any design intention for these spaces and their role and function i.e. who has access to these facilities, how does it address the street, what activities will take place, are there landscape and furniture design to encourage social cohesion. The rooftop amenity space shows no landscape design included, whilst the ground floor communal facilities is vague in its description. As stated in the SSTK SPD the applicant should demonstrate how the 'proposed communal spaces should include design features that will encourage positive interactions between people from children to the elderly. Consider including public seating areas, communal gardens and large play areas where possible. (6.1.22)' and how the 'communal amenity spaces should be orientated to maximise the amount of daylight and sunlight and have a strong landscape approach. (6.1.20)'. This aligns with London Plan Policy D6.

- The applicant states in their planning statement 'given the nature of the development it isn't particularly suitable for larger/family homes, because of the lack of private garden space (7.24)'. This is not a justified reason for omitting larger/family homes. The council are open to innovative approaches to achieving homes if well designed. In Merton's emerging Local Plan it states 'For all new houses, we will seek a minimum garden area of 50 sq.m as a single usable regular shaped amenity space. This requirement may be applied flexibly for higher density developments or constrained sites but this would have to be fully justified in the planning application.(12.3.8)'.

- On the seventh level there is a large terrace. It is not clear whether this is communal or private.

- A separate lift from the 8th floor and the continuation of the stairs has been provided to access the roof top amenity, however on the elevational drawings and the 3D views it doesn't appear that these structures exist at roof level – further clarity is needed.

- The double-loaded typology creates long and irregular corridors. As stated in the draft 'Housing Design Standards LPG', 'Internal corridors, particularly 'double-banked' corridors (those that serve flats on both sides), should be avoided or kept short and receive daylight and natural ventilation.'

- Many of the first floor homes face directly onto the railway embankment. The applicant has not demonstrated how they have considered their outlook and light levels to ensure that they are adequate.

- In many circumstances furniture is shown to obstruct the windows. The applicant should demonstrate how the proportions and scale of rooms can accommodate the relevant pieces of furniture without compromising the design. Merton's SSTK SPD states 'drawings submitted to the council should show furniture arrangements to justify the dimensions and proportions of rooms. You should think carefully about the position of furniture to make sure they do not obscure views out or compromise circulation. Appendix D of the Approved Document M volume 1 of the Building Regulations includes a furniture schedule that should be accommodated for. (7.1.8)'

· The applicant has proposed a zone of air source heat pumps. They are located on the fourth level abutting unit 4.06. The applicant should demonstrate that the proposed location for the air source heat pumps are adequately positioned to ensure that their acoustic impact does not cause harm to the proposed adjacent units.

- The proposed retail unit on ground level feels small. Does the applicant have an occupier in mind for this space? There is no clear strategy for servicing and commercial waste.

- The location of bicycle and bin stores on the ground floor are compromised and inconvenient for residents. The bicycle store for the north core is accessed via the street only and the bin store for the south core does not open directly to the street and access is through a long corridor that is shared with the bike store.
- The applicant proposed to use 'cream and blue-grey brick slips', 'metal balustrades' and 'powder coated aluminium' window frames. The applicant has provided little information on the specificity of materials, such as RAL colours of balustrades and window frames, and how their material selection has been informed. It is expected for projects of this scale to provide further certainty at this stage given their visual impact.
- It appears that the fire strategy drawings are missing from appendix A from the Fire Statement.

Station.

- The proposal relocates the entry point into the station from the junction of Kingston Road and Rothesay Avenue to adjacent the rail bridge. The existing entrance point provides a direct relationship with the local parade on Kingston Road. The relocated entrance feels hidden and the applicant has not demonstrated any clear design intention to ensure that the station entrance is of high quality design which is a missed opportunity with a strong sense of arrival to and from Wimbledon Chase.
- The applicant has provided a report to show how step-free access could be accommodated in the future, however does not commit to providing it within this proposal. With the significant increase in density, providing step-free access would have been acknowledged as a much needed public benefit.

Conclusion.

- The site is appropriate for optimisation and this is supported, however the proposed building arrangement strongly suggests that the proposal is not the most appropriate form of achieving an increase of density for the reasons set out above. Previous iterations seen at pre-app tested building arrangements that seek to maximise dual aspect homes and mitigate north facing single aspect homes. It is not clear why this was disregarded. Furthermore, the lack of daylight and sunlight to the proposed homes and the kitchens with no windows is unacceptable.
- As stated in the draft 'Optimising Site Capacity' London Plan Guidance, 'Good growth across London requires development to optimise site capacity rather than maximising density. This means responding to the existing character and distinctiveness of the surrounding context and balancing the capacity for growth, increased housing supply, and key factors such as access by walking cycling and public transport, alongside an improved quality of life for Londoners.' The proposal has symptoms of maximising density rather than optimisation. The proposed scheme lacks contextual and character analysis and many homes are compromised providing deep and narrow single aspect homes and homes with a poor level of daylight and sunlight.
- Considering the proposed significant uplift of density from 4 dwellings (circa 30 homes per ha) to 83 dwellings (circa 678 homes per ha), it is expected that there is a level of public benefit proposed, such as step-free access to the station, however this has not included as part of this application. Furthermore, it is expected that more detail is included in the DAS to justify the applicants design decisions.

5.6.9

LBM Flood Risk and Drainage Officer (28/12/2022)

Further to my previous emails on this scheme, please treat this as confirmation of our acceptance of the outline drainage/SuDS scheme for the site.

The proposal is for Green roofs covering a total area of 125 m² with a green roof mix example volume of 25 m³ (0.2 m depth) and Geocomposite example volume of 1.88 m³ (0.015m depth) would attenuate for c. 4.69 m³.

Further, a blue roof covering a total area of 125 m² with an assumed depth of 0.1m and 95% void ratio will attenuate for 11.875 m³. The proposed green and blue roofs would provide water quality, biodiversity and amenity benefits as well as slowing down runoff and reducing the total water entering the sewer through interception.

At the ground floor, rainwater harvesting measures are also proposed to help improve water efficiency. In terms of planning condition/informative, please include the following:

Condition

Prior to the commencement of development, a detailed and final construction level detail for the provision of surface and foul water drainage shall be submitted to and approved in writing by the local planning authority for both phases of the development. The drainage scheme will dispose of surface water by means of a sustainable drainage system (SuDS) to include green roofs, blue roofs, rainwater harvesting and other Green Infrastructure SuDS measures, where possible. The final drainage scheme will discharge at a run-off rate of no more than 2l/s and an attenuation volume no less than 16.5m³, in accordance with drainage hierarchy contained within the London Plan Policy (SI 12, SI 13 and SPG) and the advice contained within the National SuDS Standards.

Reason: To reduce the risk of surface and foul water flooding to the proposed development and future users, and ensure surface water and foul flood risk does not increase offsite in accordance with Merton's policies CS16, DMF2 and the London Plan policy SI 12 and 13.

Condition

The development shall be carried out in accordance with the submitted and updated Flood Risk Assessment by GeoSmart document reference: 75915.01R3 dated 022-11-16. All flood risk mitigation measures set out within the FRA, such as the flood risk resistance and resilience measures for example, must be implemented before operational use or occupancy of the site. All of the mitigation measures shall be retained and maintained thereafter throughout the lifetime of the development.

Reason : To reduce the risk of flooding to and from the proposed development and future occupants.

Informative: No surface water runoff should discharge onto the public highway including the public footway or highway. When it is proposed to connect to a public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required (contact no. 0845 850 2777).

No waste material, including concrete, mortar, grout, plaster, fats, oils and chemicals shall be washed down on the highway or disposed of into the highway drainage system.

5.6.10

LBM Environmental Health (Contaminated Land) (20/07/2022)

With regards contaminated-land we recommend three conditions, the first two, subject

to prior agreement:

1) No development shall occur until a preliminary risk-assessment is submitted to the approval of the LPA. Then an investigation conducted to consider the potential for contaminated-land and shall be submitted to and approved in writing by the local planning authority.

Reason: To protect the health of future users of the site in accordance with policy 9.10.6 of the London Plan 2021 and policy DM EP4 of Merton's sites and policies plan 2014.

2) No development shall occur until a remediation method statement, described to make the site suitable for, intended use by removing unacceptable risks to sensitive receptors, and shall be submitted to and approved in writing by the local planning authority.

Reason: To protect the health of future users of the site in accordance with policy 9.10.6 of the London Plan 2021 and policy DM EP4 of Merton's sites and policies plan 2014.

3) Prior to first occupation, the remediation shall be completed and a verification report, produced on completion of the remediation, shall be submitted to and approved in writing by the local planning authority.

Reason: To protect the health of future users of the site in accordance with policy 9.10.6 of the London Plan 2021 and policy DM EP4 of Merton's sites and policies plan 2014.

5.6.11

LBM Climate Change Officer (06/10/2022) (on-going queries in Italics)

- Energy Statement – the applicant is proposing to achieve a 62% and 42% improvement against Part L 2013 for the domestic and non-domestic elements respectively, however the following clarifications will need to be addressed before this can be recommended for approval, particularly around the overheating assessment and the Mayor's zero carbon target.

- The development – the description on the planning portal refers to 83 residential units but the energy statement refers to 91 residential units; it is not clear how many units have been modelled in the carbon assessment. Please can the applicant clarify which is correct and update the report accordingly?

The applicant has updated the energy statement to refer to 83 units but the GLA carbon reporting spreadsheet refers to 93 units. There needs to be consistency between the energy statement and carbon reporting spreadsheet. Please can the applicant clarify and amend the relevant outputs accordingly. - Also, the GLA's carbon reporting spreadsheet indicates that each sample unit is representative of 9.35 units, however, an entire unit should be representative of another unit. The number of units represented by a sample unit should therefore be a whole number. Can this be amended accordingly across the various stages of the energy hierarchy please?

- SAP evidence – please can the applicant provide the GLA's carbon reporting spreadsheet in excel format, as well as the SAP and BRUKL outputs for the sample units included in the carbon reporting spreadsheet.

- Be Lean – the applicant is proposing to achieve an 8% improvement at the be lean stage for the domestic elements which does not meet the GLA's 10% target. The 40% improvement at the be lean stage for the non-domestic element meets the GLA's 15% target which is welcome. The applicant will need to consider additional measures to further improve the energy efficiency for the domestic elements.

The updated energy statement indicates that the domestic elements will achieve the 10% target using windows with improved u-values compared to the original energy statement; this will need to be confirmed once the number of units in the carbon reporting spreadsheet matches up with the number of units in the energy statement.

- Be Clean – the applicant is not proposing to use CHP or connect to a district heating network due to the size and location of the development. Given the proximity to the district heating opportunity area in South Wimbledon/ Colliers Wood, has the applicant considered future-proofing the development for connection to a future district heat network?

The updated energy statement indicates that There will be an empty trench running below the ground floor slab from the Rothesay Avenue elevation to the ground floor plant room and the base of the riser duct adjacent to the north staircase. This will facilitate a future connection to a district heat network. Given the proximity to the Wimbledon/ Colliers Wood DHN Opportunity Area, the development should be future-proofed for connection to a future DHN. This will need to be secured via precommencement condition.

- Be Green

o Solar PV – the applicant is proposing to install 10kWp of solar PV on the top-floor roof. The roof space available for solar PV is limited due to the proposed shared amenity space. Has the applicant considered potential shading from the roof parapet if this is proposed to be a shared amenity space?

The applicant has clarified that the final location of the solar PV will be confirmed at the detailed design stage and will account for potential overshadowing. This should be secured by precommencement condition.

o Low carbon heat – the applicant is proposing to install a communal air source heat pump system Mitsubishi ECODAN CAHV or similar, which will provide all space heating through low temperature wet underfloor heating or low temperature radiators/convectors, as well as all hot water demand. The system will comprise outdoor CAHV units located at the roof area and individual indoor unit with hot water storage in each apartment. It is estimated, that up to 4 No monoblock CAHV units will be needed for the flats with a total capacity of 170 kW, requiring a roof area of approximately 10 m². Space has been allocated for the CAHV units on the roof space on the 4th floor. Have potential noise impacts been considered for units located next to these CAHV units? It looks like the 2B4P flat next to this roof space is single aspect which will limit passive ventilation in that unit. And noise may affect the neighbouring unit which has windows onto that roof space. The applicant has provided some information about the proposed heating system but please can they provide all the supplementary information set out in section 10.9 of the GLA's guidance on preparing energy assessments.

The applicant has clarified that the Acoustic impact of the outdoor units on flats facing the roof space will be assessed by a suitably qualified acoustic consultant and necessary measures will be taken, which may include acoustic enclosure for the outdoor units, triple glazed high acoustic performance windows and additional mechanical ventilation to prevent overheating. This assessment should be carried out and supporting evidence provided at this stage to confirm that the final design has mitigated any noise and overheating impacts, as this may affect the final design.

Please can the applicant also:

- Clarify how heat distribution losses have been factored into the energy assessment

- Provide the manufacturers datasheet for the proposed heating system
- Clarify the proposed approach for hot water storage
- Provide an estimate of the heating costs to occupants
- Provide evidence that the heat pump complies with the minimum performance standards as set out in the Enhanced Capital Allowances (ECA) product criteria for the relevant ASHP technology as well as evidence that the heat pump complies with other relevant issues as outlined in the Microgeneration Certification Scheme Heat Pump Product Certification Requirements document at: <http://www.microgenerationcertification.org>

o Please can the applicant also clarify the proposed heating strategy for the proposed retail unit and communal facilities for residents on the ground floor, and how the applicant is proposing to use the plant room on the ground floor?

Clarification provided in the energy statement: A variable refrigerant flow heat pump system will be provided for the commercial unit, which will provide space heating and cooling. The heat pumps will be located indoors, venting through louvres at high level in the curtain walling system. This will be covered in more detail in separate planning applications for the fit out of these spaces in due course. The proposed ground floor plant room will be subdivided to provide enclosure for water tanks and associated pump sets, and for electrical entry room equipment. Communal residential spaces will be unheated

- Overheating - An overheating analysis has been carried out in order to assess performance of the proposed development against CIBSE TM59 defining criteria of thermal comfort, and CIBSE TM49 urban climate projections A sample of the expected worst performing residential units were modelled. DSY1, 2 and 3 were tested and the applicant is proposing to mitigate the risk of overheating using passive ventilation and MVHR. The applicant has tested the top floor south/west corner unit and 2 top floor single aspect west facing units. Please can the applicant clarify why they have not tested the single aspect south facing units to test the worst case scenario? And has the overheating assessment factored in heat losses from the communal heating system? Would these losses be highest on the 4th floor closest to the communal heating system?

The applicant has included the single aspect south facing unit as an additional sample unit for the overheating assessment, and clarified that heat losses in communal corridors have been factored into the assessment.

- Single aspect dwellings should be avoided where ever possible as these increase the risk of overheating due to limited ventilation. Based on the energy statement, all windows in flats are modelled with internal blinds and blinds are necessary to comply with TM59 criteria under DSY1, which is the least extreme weather scenario. As set out in the GLA's energy assessment guidance, Reliance on internal blinds to obtain a pass in the overheating analysis should be avoided as they can interfere with the effective opening area of windows (i.e. create a barrier for airflow) and are reliant on occupant behaviour. Where blinds are used to enable a pass, the results without blinds should also be presented as these could hinder any natural ventilation strategy. Where blinds are required to enable a pass the applicant should confirm that they will be included in the base build and demonstrate that any reduction in free area of open windows due to blinds has been taken into account in the model.

The updated energy statement indicates that the development now passes the overheating assessment under DSY1 without blinds whereas it did not in the original

energy statement. Please can the applicant clarify what measures have been incorporated to mitigate the risk of overheating without blinds? Please can they clarify the difference between the original and latest overheating assessment?

- The energy statement also states: Openable balcony doors have been modelled in the flats as per architect drawings. If balcony doors are to be permanently closed in some of the flats (e.g. flats facing railway for noise reasons), it will be necessary to provide additional suitably sized mechanical ventilation to provide sufficient air changes during night hours. As set out in the GLA's energy assessment guidance, Limitations on openable windows: In instances where air quality or noise concerns pose limitations to the opening of windows, applicants will be required to submit two separate overheating analyses; one with openable windows and one with closed windows. This will ensure that passive measures have been 27 maximised and the façade design has been optimised regardless of the constraints posed by the site's location. Applicants should demonstrate that the assumptions of the overheating model are aligned with the noise and air quality assessments. Applicants are encouraged to refer to relevant published guidance which draws together these areas including the Acoustics, Ventilation and Overheating Residential Design Guide²¹ (January 2020). The applicant will need to demonstrate that the overheating assessment has taken into account potential noise, security and air quality considerations in the proposed ventilation strategy, particularly given the proximity to the railway line and station, and confirm that the assumptions are correct in terms of openable windows and balcony doors.

It doesn't look like the applicant has carried out a detailed noise assessment in line with the GLA's guidance. As set out above, this should be carried out at this stage as this will inform the final design of the development to ensure that the risk of overheating is mitigated, as well as the final energy demand for any mechanical ventilation.

- Mayor's zero carbon target – as set out in the London Plan, all major development is required to achieve the Mayor's zero carbon target for both domestic and non-domestic elements. If this cannot be achieved on site, the applicant will need to offset the carbon shortfall through carbon offset contributions.

The applicant has not set out how they propose to achieve the Mayor's zero carbon target. This will need to be clarified in the report. The applicant has clarified that they are proposing to pay £90,856 carbon offset contributions to achieve the Mayor's zero carbon policy target. However, the final carbon offset contributions will need to be confirmed once the comment above have been addressed.

- Be Seen – the development will be designed to enable post construction monitoring and the information set out in the 'be seen' guidance will be submitted to the GLA's portal at the appropriate reporting stages. This will need to be secured through suitable legal wording.

- Internal water usage rates – the energy statement indicates that the development will achieve internal water usage rates of less than 105 litres per person per day; this will need to be secured via condition.

5.6.12

LBM Affordable Housing Officer (comments in relation to original scheme) (19/10/2022)

Set within the current challenging context of Merton's need to address its five year housing supply (5yLS) and considerable annual housing target of 918 homes, the scheme proposing 83 additional homes will make a useful contribution to the council meeting its aforementioned housing requirements and 5yLS. That said, the fact that the scheme proposes no affordable homes supported by a submitted viability report

indicating that the scheme will result in a negative Residual Land Valuation (RLV) and therefore unviable, according to the applicant raises questions and concern.

Whilst not a viability expert, intuitively there are doubts as to why the applicant would proceed with a scheme which from their viability report indicates that it will come forward at a loss. Interestingly all scenarios in their report are predicated on zero affordable housing provision. It is questionable to what extent the council's planning policy requirements were taken into account in contributing to informing on what a reasonable price would be to pay for the site. Given the negative RLV can the site proposal actually be delivered?

It is noted that the applicant assumes 6% finance costs. How is this scheme being financed and if a lender is supporting this on what basis is a scheme proposing a negative RLV considered acceptable to a lender?

Has or will grant be sought by the applicant to improve the viability and affordable housing provision position?

Thank you for providing me with a copy of Altair's FVA which I have briefly looked at. I note that there are significant differences between Altair's viability input assumptions and those of the applicants e.g. resulting between the two parties in a difference in GDV of the proposed homes of £1,074,370. Furthermore whilst the applicant has indicated the scheme is not viable, Altair have indicated that it is actually viable even with the inclusion of affordable housing provision albeit at the significantly reduced provision of around 5% compared to the policy requirement of 35-50%.

There are several instances in Altair's FVA where whilst they have questioned or highlighted the lack of evidence supporting the applicant's viability input assumptions Altair have nonetheless chosen to accept these assumptions without explanation or justification. It is noted that minimal tweaks in assumption inputs can make a significant difference to the viability outcome of schemes therefore it is advised that these instances should be further examined and challenged.

It is advised that BNP Paribas be commissioned to also undertake an assessment of the applicant's FVA, not least to demonstrate that the council has used best endeavours to ensure that the level of affordable housing provision is optimised having regard to viability.

Housing mix

Para. 7.24 of the applicant's Planning Statement says: "...given the nature of the development it isn't particularly suitable for larger/family homes, because of the lack of private garden space"

It would be helpful if consideration from the council's urban designers could be sought, to establish whether the applicant's approach is justified, and whether any physical constraints and / or material considerations of the site limit the provision of adequate levels of private garden space.

The scheme proposes 7% studios; 67% 1 bed; 16% 2b4p and 10% 2b3p. It would be preferred if the number of studios and 1-bed units proposed could be replaced by more 2b 3p and 4p units.

5.6.13

LBM Affordable Housing Officer (comments in relation to amended scheme 07.02.2023)

In response to your request for comments on the Wimbledon Chase applicant's latest affordable housing offer of 30% (habitable rooms) the following is my feedback on the revised scheme:

1. The applicant proposes an affordable housing provision of 24% by units (30% by hab rooms). Whilst this is considered as an improvement on the previous offer of no affordable homes, it still falls short of the Statutory Development Plan requirement of 35%.
2. The applicant proposes 10.7% (12.4% hab rooms) by unit as social rented and 13.3% (17.5% hab rooms) as shared ownership. Clarity is requested on what the 0.3; 0.4; 0.5; 0.7 of a unit represent? A more preferable option would be to round up to a whole unit (ideally social rented) - i.e. 11 social rented units and 13 shared ownership units. (please note - this suggestion does not imply acceptability of the proposed affordable housing tenure mix - please also refer to point 2 below)
3. The applicant proposes an affordable housing tenure mix of 45% social rented and 55% intermediate, which does not comply with the Statutory Development Plan affordable tenure mix requirement, supported by Merton's Housing Needs Study ([SHMA 2019](#)), of 60% affordable rented and 40% intermediate housing.
4. Similarly the proposed scheme's bed unit size mix of 60% 1beds; 36% 2 beds and 4% 3 beds is inconsistent with the Statutory Development Plan preferred mix of roughly equal thirds 1, 2 and 3 bed units, again supported by robust evidence set out in Merton's Housing Needs Study ([SHMA 2019](#)). The scheme site is located in a fairly low PTAL area (PTAL3).

5.6.14 **LBM Highway Officer (11/08/2022)**

Highways comments are:

H1 (new vehicular access), H2 (Vehicle Access to be provided), H3 (Redundant crossovers), H4 (Provision of Vehicle Parking), H5 (Visibility Splays), H10 (Construction Logistics Plan), H13 (Construction Logistics Plan).

INF8 , INF9, INF12

Any construction work required on the public highway would be carried out by Merton Council.

A concern within their documents is they are proposing the 3no blue badge bays required within the development are being proposed on the public highway and Transport Planning need to comment on their parking and loading proposals

5.7 External Comments

5.7.15 **Historic England (Archaeology) (02/08/2022)**

The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are necessary.

5.7.16 **Thames Water (29/07/2022)**

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

[https://urldefense.com/v3/ https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/working-near-ourpipes-!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvhQh6VLZfoWuelklp0_WE4ek3NEYoJo-A_Rg8DDQco\\$](https://urldefense.com/v3/https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/working-near-ourpipes-!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvhQh6VLZfoWuelklp0_WE4ek3NEYoJo-A_Rg8DDQco$)

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission.

“No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.”

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.

[https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/working-near-ourpipes__;!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvQh6VLZfoWuelklp0_WE4ek3NEYoJo-A_Rg8DDQco\\$](https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/working-near-ourpipes__;!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvQh6VLZfoWuelklp0_WE4ek3NEYoJo-A_Rg8DDQco$)
Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without 2 a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:

“A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via

[https://urldefense.com/v3/_http://www.thameswater.co.uk_!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtv-hQh6VLZfoWuelklp0_WE4ek3NEYoJo-A_RtUBsu8w\\$](https://urldefense.com/v3/_http://www.thameswater.co.uk_!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtv-hQh6VLZfoWuelklp0_WE4ek3NEYoJo-A_RtUBsu8w$)

Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

[https://urldefense.com/v3/ __https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/working-near-ourpipes_!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvhQh6VLZfoWueIklp0_WE4ek3NEYoJo-A_Rq8DDQco\\$](https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scale-developments/planningyour-development/working-near-ourpipes_!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvhQh6VLZfoWueIklp0_WE4ek3NEYoJo-A_Rq8DDQco$)

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission.

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

[https://urldefense.com/v3/ __https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-ourpipes_!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvhQh6VLZfoWueIklp0_WE4ek3NEYoJo-A_Rq8DDQco\\$](https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-ourpipes_!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtvhQh6VLZfoWueIklp0_WE4ek3NEYoJo-A_Rq8DDQco$)

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

[https://urldefense.com/v3/ __https://www.thameswater.co.uk/developers/larger](https://urldefense.com/v3/__https://www.thameswater.co.uk/developers/larger)

-scale-developments/planningyour-development/working-near-our-3
pipes__;!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6
mSovAZbsKkW7OK9aZnf_Df0hrtvhQh6VLZfoWuelklp0_WE4ek3NEYoJo-
A_Rg8DDQco\$

Should you require further information please contact Thames Water.
Email:developer.services@thameswater.co.uk

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 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.

5.7.17

Transport for London (24/02/2023)

In response to the applicants comments:

7. The one long-stay staff cycle parking space would be able to be provided within the curtilage of the retail unit. With regards to the 8 no. short-stay spaces, it is considered that these could be absorbed within the existing 20-space provision currently on Kingston Road and Rothesay Avenue which already serve the existing retail units.

TfL would strongly support additional short stay cycle parking in the form of 4 additional Sheffield stands being provided in the public realm, on top of existing cycle parking provision. This is to comply with London Plan policy T5 (Cycling) and to further encourage mode shift and active travel.

The residential cycle store layouts have been amended to provide seven (5%) enlarged Sheffield stands for adapted cycles measuring 1.0m x 2.3m. The stands are split between the two stores as shown on CZWG drawing no. 2179-10- DR-0100-PL5.

This is welcomed.

10 E. As acknowledged in TfL comment 10a, the retail unit would generate minimal daily service vehicle trips (1 vehicle per day). Whilst trips would be scheduled where possible to avoid the peak hours, implementing the above restrictions is considered unreasonable given the very low trip generation and nature of the site use.

Although the retail unit may only generate a very small number of daily servicing trips, as set out in our original consultation response, the scheduling of deliveries outside of network peak hours would be strongly supported in line with London Plan policies T4e and T7 (Deliveries, servicing and construction).

I hope this updates you on TfL's position. If you have any queries regarding this response please do not hesitate to contact me.

5.7.18

Transport for London (05/08/2022)

TfL offers the following comments:

1. The site of the proposed development is on the A238 Kingston Road, which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic

Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.

2. TfL understands that the proposal entails the construction of a retail unit (150sqm GIA) and 83 residential units (6 x studio, 56 x 1 bed, 21 x 2 bed).

3. The site has a Public Transport Access Level (PTAL) of 3, on a scale ranging from 0 to 6b where 6b represent the highest access to public transport.

4. It is supported that the development will be car-free with the exception of 3 residential Blue Badge (BB) parking spaces in line with Policy T6 of the London Plan. These will be provided on-street on Rothesay Avenue adjacent to the residential core entrances.

5. It is understood that the proposed new access to the Network Rail maintenance parking area will result in the loss of 2 existing on-street parking bays on Rothesay Avenue and the proposed loading bay on Kingston Road would result in the loss of a further two on-street parking bays. These will be re-provided on Rothesay Avenue, which is subject to approval from Merton Council. It is supported that a Stage 1/2 Road Safety Audit (RSA) of the proposed parking arrangements on Rothesay Avenue and the Kingston Road loading bay has been undertaken.

6. TfL understands that the proposed scheme will replace the existing Wimbledon Chase Station entrance with a more direct link from the A238 Kingston Road parallel to the raised railway line. Improving accessibility to the station is supported, although this is subject to approval from Merton Council and Network Rail.

7. It is supported that 132 long-stay and 4 short-stay cycle parking spaces will be provided to the residential units in line with Policy T5 of the London Plan. In the worst-case scenario that the retail unit will be a café, a minimum of 1 long-stay and 8 short-stay cycle parking spaces should also be provided in line with Policy T5 of the London Plan. All cycle parking should be located in a secure, sheltered and accessible location, and should meet design standards set out in Chapter 8 of the London Cycle Design Standards (LCDS).

8. At least 5% of the cycle parking spaces should be for larger and adapted cycles in line with Chapter 8 of the LCDS. It is also encouraged for at least 20% of the cycle parking spaces to be provided as Sheffield stands at standard spacing (recommended 1.2m, minimum 1.0m).

9. A Construction Logistics Plan (CLP) should be secured through condition, in line with Policy T7 of the London Plan, so that TfL can confirm impacts on the SRN and the surrounding transport network. Please note that any impact/changes to TfL Assets/Infrastructure will require approval from TfL.

10. After reviewing the Delivery & Servicing Plan (DSP), TfL has the following comments:

a) It is understood that the residential units will receive an average of 17 delivery and servicing vehicles per day and the retail unit an average of 1 per day.

b) All delivery and servicing activity will be undertaken from the proposed loading bay on the A238 Kingston Road in the location of the existing two on-street parking bays adjacent to the eastbound bus cage. This would involve the existing Rothesay Avenue bellmouth kerbs being built out in line with the arrangement at the Sandringham Avenue junction to ensure suitable visibility can be achieved. It is requested that detailed plans of the proposed highway changes are provided.

c) Refuse collection for the residential units will be undertaken from Rothesay Avenue

in line with the existing arrangement for the other properties on the road. This is supported.

d) It is welcomed that the applicant is committed to safer, more efficient and more environmentally friendly distribution by contracting operators registered with a best practice, such as the Fleet Operators Recognition Scheme (FORS), and encouraging the use of cargo bikes.

e) It is supported that the building management and retail unit tenant will work with suppliers to schedule activities where practical. It is requested that all deliveries to the retail unit are scheduled outside the network peak hours of 08:00-10:00 and 16:00-18:00 to avoid congestion and reduce any impact on public safety.

f) It is supported that the DSP will be secured by condition.

11. After reviewing the interim Travel Plan (TP), TfL has the following comments:

a) It is supported that a Travel Plan Coordinator (TPC) will be appointed prior to occupation of the site and they will have the overall responsibility for the day-to-day management and implementation of the TP.

b) TfL supports that the first set of travel surveys for the development will be undertaken within six months of first occupation and at the end of the Years 1, 3 and 5. Appropriate targets will then be set within 1 month of the baseline survey being completed.

c) It is understood that the Nomis database, which contains national travel data from the 2011 Census, has been used to set interim mode share targets for the development. This indicates that roughly 16% of residents will use active travel as part of their commute, whilst 84% will use other modes, primarily public transport. It is supported that the TP seeks to achieve a 10% uplift in the number of residents travelling to and from the site by active modes of travel.

d) The proposed measures include the provision of a Welcome Pack and free 'Personal Journey Plans'; promotion of national walking and cycling events, such as National Walking Month and National Bike Week; encouragement of a Bicycle User Group (BUG) to be set up; promotion of TfL's 'Cycle Skills' course. These are supported.

e) It should be confirmed whether the applicant will provide shower, locker and changing facilities to staff of the retail unit in order to encourage active travel.

f) The importance of securing the funding for the elements of the plan at an early stage of the development process has been acknowledged. The provision of funding streams for the monitoring and management of the TP should be secured prior to implementation and the TP should be secured through a S106 agreement.

12. The footway and carriageway on the A238 Kingston Road should not be blocked during the development works. Temporary obstructions during the works should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A238 Kingston Road. All vehicles should only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions.

TfL requests additional information to address points 7, 8, 9, 10(b, e), 11(e, f) prior to being supportive of the application.

5.7.19

Environment Agency - flooding (08/11/2022)

The site is in FZ1 (low risk) for fluvial/tidal flooding, so we would have no comments to

add in that regard.

We recommend you contact your Lead Local Flood Authority with regards to other sources of flooding which fall within their remit (e.g. groundwater, surface water).

5.7.20

Environment Agency – land contamination (08/11/2022)

Various advice notes offered in relation to land contamination, drainage design and contamination, engineering works, soils and stones & waste removed from development sites.

Condition:

If piling is proposed, a Piling Risk Assessment should be undertaken to confirm the proposed design does not pose risks to the groundwater, This should be accordance with EA guidance document “Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73”.

5.7.21

Designing Out Crime (09/08/2022)

Having given due consideration to the design of this development, I recommend the following security features be addressed / included:

- The front of the current development has a good amount of tree growth along the pavement. If this was to become the entrance for the station any CCTV or lighting opportunities would be very limited. The trees would need to be either removed or trimmed back, depending on any tree protection orders that are attached to maximise surveillance opportunities.
- Residential communal space should be clearly defined and access controlled to prevent unrestricted public access. There should be no linkage between retail, public, communal and private areas.
- Recessed doors onto public spaces should be avoided. This is to mitigate loitering, nuisance behaviour and ‘smokers corners’. The residential entrances and the Network Rail entrance on Rothesay Avenue all appear to be recessed. With balconies overhead these then provide shelter for this type of behaviour.
- I’d recommend a secondary door is installed in the North Core cycle store. With just one door shown, if this were to fail then the cycle store would be vulnerable to any would be thief.
- The refuse store doors should be single leaf, as double doors require double the security. They should be third party tested and certified to a minimum security standard of PAS 24:2016. They should also be self-closing and locking with a push to exit button and PIR lighting. This would discourage illegitimate use. The doors should be key fob access only. Not key or key pad operated as the methods are unreliable as they are often left unlocked for ease or the key code is readily distributed or compromised by a wearing down of the buttons. The retail and communal bin stores should be kept separate.
- Balconies or terraces that are close to one another should have fencing or glazed opaque screens to allow privacy and restrict climbing.
- The new station entrance has a flat roof which could be vulnerable and should be designed to remove climbing aids which would aid entry into the properties. This could also provide access to the railway tracks and Railway Bridge and be a means for

graffiti or criminal damage.

I recommend you consider the following points for your podium amenity space.

- Access into the amenity area should be controlled by coded fob readers so residents would require a fob with them to gain entry and entry ideally should be restricted to their specific core - this can be monitored and controlled by management (i.e. no entry after 10pm for example).
- CCTV should cover the whole area to prevent issues arising and enable management control. I recommend a management policy for the use of these areas perhaps denying entry after a set time as stipulated on the residents lease agreement.
- Computer controlled lighting can automatically reduce lighting levels at a set time to signify that the garden area is closing for the night and reduce light pollution.
- A management plan is recommended to address any maintenance and management issues.
- A set back from the edge and high glazing or similar barriers to prevent suicide or items being thrown onto the street below.

British Transport Police Designing Out Crime officers were also consulted and provided the following comment.

- I note that one side of the site runs parallel with operational running lines; I would encourage any proposed developer to be mindful in creating a suitable stand-off from the railway boundary so as any maintenance can be carried out without having to impede on the railway operations. The architectural artist impression is not detailed enough to show how close this will be to operational lines, however, any development should be mindful of trespass / suicide potential and incorporate commensurate measures necessary. It is required that the relevant DOCO is kept informed as discussions / plans progress.

As with any development these recommendations are not exhaustive and further consultation would be encouraged once the detailed design stage is reached.

Recommendations

Crime Prevention and community safety are material considerations. If The London Borough of Merton are to consider granting consent, I would seek that the following conditions be attached. This is to mitigate the impact and deliver a safer development in line with the Merton New Local Plan (Stage 3), the London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

Suggested two part condition wording:-

A. The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy: Chapters 01B & 01C Merton New Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

B. Prior to occupation a Secured by Design final certificate or its equivalent from the South West Designing Out Crime office shall be submitted to and approved by the Local Planning Authority.

Reason: In order to achieve the principles and objectives of Secured by Design to provide a safer environment for future residents and visitors to the site and reduce the fear of crime in accordance with Policy: Chapters 01B & 01C Merton New Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

The inclusion of any such conditions would assist to reassure local residents and police that security is a material consideration of the developer.

5.7.22 **External independent financial viability assessor** (27/10/2022)

(comments from Altair Ltd in relation to originally submitted scheme, which proposed no affordable housing)

We conclude that the proposed scheme can viably provide 5 x homes (studio flats) for affordable rent. Depending on the mmix of homes this could change the level of provision that is financially viable.

Item	Applicant FVA	Altair Assessment
Residential GDV	£37.4m (£716 psf)	£38,120,000
Commercial GDV	£785,312	£785,312
Capitalised Ground Rent	-	-
Base Works	£22.8m (£3,000 sqm, incl 3% cont.)	£21.9m (£2,787 sqm, incl 3% cont.)
Purchaser's Costs	6.80% - Commercial	6.80% - Commercial
SDLT	SDLT - 5% Legal Fees - 1.5%	SDLT - 5% Legal Fees - 1.5%
Professional Fees	6.00%	6.00%
S106 and CIL	£2,948m	£2,948m
Sales & Marketing	3.00% - Private Resi 2.00% - Commercial	3.00% - Private Resi 2.00% - Commercial
Developer's Return	20% - Private Resi 15% - Commercial	17.5% - Private Resi 15% - Commercial
Finance Cost	6.00%	6.00%
Benchmark Land Value	£2,471,149	£2,279,942

Table 12 - Key Appraisal Assumptions

5.7.23 **External independent financial viability assessor** (02/02/2023)

(comments from Adams Integra Ltd in relation to the scheme amended on 02/02/2023 – 30% affordable housing):

We have carried out an appraisal of the current scheme using the input values described above with a 100% open market scheme.

The appraisal produces a RLV of £2,215,362 (See Appendix 1).

When compared to the BLV of £2,279,942 this shows that the scheme is viable with 100% open market units.

We then carried out a further appraisal with the applicant's affordable housing offer of 21 affordable units (8 rent and 13 shared ownership).

This appraisal, at Appendix 4, shows a RLV of £1,699,901. Whilst this is still a positive

RLV it is below the BLV and is technically not viable.

However, the applicants have stated that they are willing to proceed on the basis that they will offer the 21 affordable units and take a lower profit in the expectation that they will be able to make savings from value engineering going forward.

If the profit level on the open market units was reduced to 15% then the RLV would increase to £2,362,981 which when compared to the BLV of £2,279,942 results in a surplus of £83,039 (see appendix 5).

It is our opinion, therefore, that the scheme is not able to support any additional affordable housing contribution over and above the 21 units offered.

6. POLICY CONTEXT

List of relevant planning policies

National Planning Policy Framework (2021)

- Chapter 2 Achieving sustainable development
- Chapter 4 Decision-making
- Chapter 5 Delivering a sufficient supply of homes
- Chapter 6 Building a strong, competitive economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

London Plan 2021

- Policy SD6 Town centres and high streets
- Policy SD7 Town centres: development principles and Development Plan Documents
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D13 Agent of Change
- Policy D14 Noise
- Policy H1 Increasing housing supply
- Policy H2 Small sites
- Policy H4 Delivering affordable housing

- Policy H5 Threshold approach to applications
- Policy H6 Affordable housing tenure
- Policy H7 Monitoring of affordable housing
- Policy H10 Housing size mix
- Policy S4 Play and informal recreation
- Policy S5 Sports and recreation facilities
- Policy E9 Retail, markets and hot food takeaways
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI 1 Improving air quality
- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 5 Water infrastructure
- Policy SI 7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SI 10 Aggregates
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.1 Residential parking
- Policy T6.3 Retail parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Merton Core Strategy (2011)

- Policy CS 7 Centres
- Policy CS 8 Housing Choice
- Policy CS 9 Housing Provision
- Policy CS 11 Infrastructure
- Policy CS 12 Economic Development
- Policy CS 13 Open space, nature conservation, leisure and culture
- Policy CS 14 Design
- Policy CS 15 Climate Change
- Policy CS 16 Flood Risk Management
- Policy CS 17 Waste Management
- Policy CS 18 Active Transport
- Policy CS 19 Public Transport
- Policy CS 20 Parking, Servicing and Delivery

Merton Sites and Policies Plan (2014)

- DM R1 Location and scale of development in Merton's town centres and neighbourhood parades
- DM R3 Protecting corner/ local shops
- DM H2 Housing mix
- DM H3 Support for affordable housing
- DM E4 Local employment opportunities
- DM O2 Nature Conservation, Trees, hedges and landscape features
- DM D1 Urban design and the public realm
- DM D2 Design considerations in all developments
- DM D4 Managing heritage assets
- DM D7 Shop front design and signage
- DM EP1 Opportunities for decentralised energy networks
- DM EP2 Reducing and mitigating noise
- DM EP3 Allowable solutions
- DM EP4 Pollutants
- DM F1 Support for flood risk management
- DM F2 Sustainable urban drainage systems (SuDS) and; Wastewater and Water Infrastructure
- DM T1 Support for sustainable transport and active travel
- DM T2 Transport impacts of development
- DM T3 Car parking and servicing standards
- DM T4 Transport infrastructure
- DM T5 Access to the Road Network

7. PLANNING CONSIDERATIONS

7.1.1

The key issues in the assessment of this planning application are:

- Principle of development
 - *Station entrance*
 - *Provision of housing*
 - *Merton's five year land supply*
 - *Conclusion on principle of development*
- Housing mix
- Affordable Housing
 - *Delivering affordable housing*
 - *Threshold approach to applications*
 - *Affordable housing tenure*
- Design and impact on the character and appearance of the area
 - *Massing and heights*
 - *Layout*
 - *Design and appearance*
- Impact on neighbouring amenity
 - *Summary of Daylight and Sunlight Assessment criteria:*
 - *Bulk and massing (loss of light, shadowing and visual intrusion)*
 - *Conclusion on loss of light, shadowing and visual intrusion impacts*
 - *Overlooking*
 - *Conclusion on impact on neighbouring amenity*
- Standard of accommodation
- Inclusive Design and Accessible Housing

- Transport, highway network, parking and sustainable travel
 - *Car Parking*
 - *Cycle Parking*
 - *Deliveries and Servicing*
 - *Trip Generation*
 - *Construction process*
 - *Conclusion on transport matters*
- Flooding and site drainage
- Sustainability
- Air quality and potentially contaminated land
- Biodiversity
- Safety and Security considerations
- Fire safety

7.2 Principle of development

7.2.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the development plan, and the determination shall be made in accordance with the development plan, unless material considerations indicate otherwise.

Commercial

7.2.3 Policy CS7 supports development in Merton's neighbourhood parades commensurate with their scale and function and where it improves the character and local environment of the area.

7.2.4 In terms of the retail element of the proposals, Policy DM R1 sets out that neighbourhood parades will be maintained to provide convenience shopping within walking distance of local residents. The policy goes on to state that large increases in commercial floor space in neighbourhood parades will be resisted (280sqm for the purposes of this policy).

7.2.5 The site is within the Neighbourhood Parade. The new retail floor space proposed is effectively a replacement of existing retail floor space. The existing 246sqm would be replaced by a total of 155.5sqm retail floor space, which would be a marginal reduction but would be set out in a more regular footprint. As the commercial use is retained, no concerns are raised.

Station Entrance

7.2.6 Policy T3 of the London Plan supports the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs.

7.2.7 The scheme would replace the existing station entrance. The new station entrance would have modern lighting and materials, with upgrades to the Public Announcement System and CCTV. The design of the station introduces a new rear entrance which can be used as a secondary access for passengers to the station platforms during the construction of the step free platform access.

7.2.8 Whilst step free access is not proposed as part of this application, the proposal demonstrates how future step-free access could be achieved.

7.2.9 The proposed replacement of the station entrance, with upgraded lighting, materials, PA systems and CCTV is a benefit of the proposal and is welcomed in policy terms.

Residential

- 7.2.10 National Planning Policy Framework (NPPF) 2021 - Paragraph 124 explains planning decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed, attractive and healthy places.
- 7.2.11 NPPF Paragraph 125 states that it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 7.2.12 The National Planning Policy Framework requires Councils to identify a supply of specific 'deliverable' sites sufficient to provide five years' worth of housing with an additional buffer of 5% to provide choice and competition.
- 7.2.13 Policy H1 of the London Plan 2021 states that development plan policies should seek to identify new sources of land for residential development including intensification of housing provision through development at higher densities. Core Strategy policies CS8 & CS9 seek to encourage proposals for well-designed and conveniently located new housing that will create socially mixed and sustainable neighbourhoods through physical regeneration and effective use of space.
- 7.2.14 Policy H1 of the London Plan 2021 has set Merton a ten-year housing target of 9,180 new homes. The proposal would make a valuable contribution to meeting that target and providing much needed new housing.
- 7.2.15 The proposal to provide a residential use to this site is considered to respond positively to London Plan and Core Strategy planning policies to increase housing supply and optimise sites.
- Merton's five year land supply
- 7.2.16 Merton currently does not have a five-year supply of deliverable housing. It is therefore advised that members should consider this position as a significant material consideration in the determination of planning applications proposing additional homes.
- 7.2.17 Where local planning authorities cannot demonstrate a five year supply of deliverable housing sites, relevant decisions should apply the presumption in favour of sustainable development. This means that for planning applications involving the provision of housing, it should be granted permission unless:
- the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse effect of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole
- 7.2.18 In real terms, if Merton continues to not meet its housing supply, then greater weight will need to be given to delivering more housing in the planning balance. Therefore, it is important that the Council seeks to deliver new housing now and make the most efficient use of sites to deliver new homes with appropriately designed buildings. The scheme is considered to make efficient use of the site with a good quality development that respects the character and appearance of the area without being harmful. The additional accommodation created on the site will make a valuable contribution towards Merton meeting its housing targets.

Small Sites

7.2.19 The application site has a site area of 0.127 hectares. The application site therefore falls under planning policy H2 (Small Sites) of the London Plan 2021. Following on from the housing targets set out above, small sites are expected to deliver 2,610 new homes over the 10 year period (2019/20 - 2028/29). Policy H2 sets out that for London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.

Conclusion on principle of development

7.2.20 The proposal is considered to respond positively to London Plan and Core Strategy planning policies to meet increased housing targets and optimising sites and the principle of development is considered to be acceptable subject to compliance with the relevant policies of the Development Plan.

7.3 Housing mix

7.3.21 London Plan Policy H10 and associated planning guidance promotes housing choice and seeks a balance of unit sizes in new developments.

7.3.22 Policy DM H2 of the SPP aims 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. The policy sets out the following indicative borough level housing mix:

Number of bedrooms	Percentage of units
One	33%
Two	32%
Three +	35%

7.3.23 The London Plan advises that boroughs should not set prescriptive dwelling size mix requirement but that the housing mix should be informed by the local housing need.

"H10 (London plan Policy):

7.3.24 Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

- robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
- the requirement to deliver mixed and inclusive neighbourhoods
- the need to deliver a range of unit types at different price points across London
- the mix of uses in the scheme
- the range of tenures in the scheme
- the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre

or station or with higher public transport access and connectivity

- the aim to optimise housing potential on sites
- the ability of new development to reduce pressure on conversion and sub-division of existing stock
- the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

7.3.25 Policy H10 of the London Plan sets out all the issues that applicants and boroughs should take into account when considering the mix of homes on a site.

7.3.26 The housing mix proposed is:

Type	No.	Percentage split	
Studio	6	8.1%	58%
1b	37	50%	
2b/3p	22	29.7%	36.5%
2b/4p	5	6.8%	
3b/5p	3	4.05%	5.5%
4b/6p	1	1.4%	
Total:	74	100%	100%

7.3.27 The application does not accord with the indicative, borough wide mix set out in SPP Policy DM H2, in particular, in regards to the provision of family sized units. However, it is noted that flatted accommodation is not ideal for family occupation and given the proximity to public transport routes it is considered that a provision of smaller units would be acceptable.

7.4 Affordable Housing

7.4.1 The London Plan highlights delivering more genuinely affordable housing is a key strategic issue for London. Meeting the need for circa 43,500 affordable homes per year, as established in the 2017 Strategic Housing Market Assessment, will require an increase in affordable housing contributions from all sources. All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources. This is critical to enabling London to meet the housing needs of its workforce and maintain the function and resilience of the city.

Delivering affordable housing

7.4.2 Planning policy H4 (Delivering affordable housing) of the London Plan 2021 sets the strategic target of 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:

- 1) requiring major developments which trigger affordable housing requirements 50 to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)
- 2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided
- 3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of

strategic partners

- 4) public sector land delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
- 5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

7.4.3 Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

Threshold approach to applications

7.4.4 Planning policy H5 (Threshold approach to applications) of the adopted London Plan 2021 states:

A) The threshold approach applies to major development proposals which trigger affordable housing requirements.

B) The threshold level of affordable housing on gross residential development is initially set at:

1) a minimum of 35 per cent; or

2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or

3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.

C) To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy

2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)

3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant

4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.

D) Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant.

E) Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within

two years of the permission being granted (or a period agreed by the borough).

F) Where an application does not meet the requirements set out in Part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:

1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG

2) viability tested schemes will be subject to:

a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)

b) Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)

c) Mid Term Reviews prior to implementation of phases for larger phased schemes.

G) Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

Affordable housing tenure

7.4.5

Planning policy H6 (Affordable housing tenure) of the adopted London Plan 2021 states:

A) The following split of affordable products should be applied to residential development:

1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes

2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership

3) the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

B) To follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in Part A. The Fast Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold level is reached. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2), and should take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular

tenure.

- 7.4.6 If a scheme cannot comply with the affordable housing targets above, then the full planning application must be submitted with a viability report.
- 7.4.7 In this case the applicant has provided a financial viability assessment, based on the originally submitted scheme, which initially proposed no affordable housing on the basis of lack of financial viability. This was reviewed by a third party appointed by the Council who concluded that 5 units could be reasonably provided as affordable housing.
- 7.4.8 Following discussions with Officers the scheme has been amended from the originally submitted scheme and a FVA has been submitted to reflect the current proposal. This FVA is based on 17.5% profit for the residential element and 15% profit for the commercial element. This FVA has been reviewed by another third party, appointed by the Council, who has concluded that the Residual Land Value (RLV - the residual land value produced by a potential development is calculated by subtracting the costs of achieving that development from the revenue generated by the completed scheme), is calculated to be £2,215,362. The Benchmark Land Value (BLV) would be £2,279,942. Therefore, providing a surplus of £64,580, which could be made available for affordable housing contributions (N.B. if a 15% profit rate were used for the residential element the surplus would be £83,039).
- 7.4.9 Notwithstanding the position on financial viability, the applicant has since made an offer of 20% affordable housing provision by habitable room with a 50/50 split between affordable rent and intermediate (This would equate to 12 units). In addition, the applicant proposes to offer up a pre-implementation viability review, using the agreed benchmarks within the viability reports, given that the residential element of the scheme will not start on site for 24 months from a decision, which will capture any improvement in market conditions.
- 7.4.10 Given the situation in relation to financial viability, any provision over and above £64,580 would be a planning benefit of the scheme. Therefore, Officers would advise that the provision of 20% affordable housing is a material consideration of significant weight in determining this application.

7.5 Design (character and appearance)

- 7.5.11 The NPPF, London Plan policies D3 and D4, Core Strategy policy CS 14 and SPP Policy DM D2 require well designed proposals which make a positive contribution to the public realm, are of the highest quality materials and design and which are appropriate in their context. Thus, development proposals must respect the appearance, materials, scale, bulk, proportions and character of their surroundings.
- Massing and heights
- 7.5.12 Consideration of matters of massing and height may reasonably be informed by the application of both London Plan and local planning policies and supplemented by the Council's Tall Building Background paper which helped shape core strategy design policy and its justification.
- 7.5.13 The London Plan defines tall and large buildings as those buildings that are 'substantially taller than their surroundings, cause a significant change on the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor'.
- 7.5.14 Considering the London Plan definition, any building that has a significant impact on the existing scale and character of an area through height can be considered a tall

building. 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 these locations.

- 7.5.15 Highrise tower blocks located in denser areas of the borough are most common for residential, commercial or mixed use functions, where they can be an efficient use of land, and will be significantly taller than their surroundings and have a significant impact on the skyline. These tall buildings do not necessarily have a large building footprint and if designed well at the ground level can contribute positively to the streetscene.
- 7.5.16 Tall buildings can make a positive contribution to city life, be excellent works of architecture in their own right, can affect the image and identity of a city as a whole, and can serve as beacons for regeneration and stimulate further investment.
- 7.5.17 The London Plan requires that ‘tall buildings should always be of the highest architectural quality, (especially prominent features such as roof tops) and should not have a negative impact on the amenity of surrounding uses’.
- 7.5.18 In policy terms, higher density development is directed towards centres and those areas that are well serviced in terms of public transport and infrastructure, and those areas that can accommodate the increase in density without having a detrimental impact on the character of the locality, including the historic environment.
- 7.5.19 The LBM Tall Buildings paper indicates that “overall it is considered that suburban neighbourhoods in the borough are unsuitable locations for tall buildings, based on the distinct low scale and cohesive character of these areas, and their locations which are generally outside of centres in areas with low accessibility”.
- 7.5.20 The site is not within a designated Town Centre but it is within the local centre of Wimbledon Chase, which is a neighbourhood parade. The proposed building would stand adjacent to the train station in an area where building heights are greater than the 2 storey suburban development that characterises much of the borough.
- 7.5.21 Paragraph 22.20 of the Core Planning strategy states:
- “Merton's Tall Buildings Background Paper (2010) advises that tall buildings are generally not appropriate within the borough due to its predominately suburban low rise character, and will be resisted in all areas of the borough where they will be detrimental to this valued character. Tall buildings may be suitable in areas of the borough where all of the following factors are present:
- Regeneration or change is envisaged
 - Good public transport accessibility
 - Existing higher building precedent”
- 7.5.22 In response to these criteria, officers conclude that:
- The site is within an area where change is envisaged, particularly given the higher housing targets of the London Plan.
 - Public transport in the vicinity of the site is moderate but it is noted that the site building would act as a landmark for the train station.
 - The area is generally one of low to medium rise, with two-storey residential housing but rises to 4-5 storeys within the Neighbourhood Parade.
- 7.5.23 The Council's Tall Buildings Paper sets out:

“3.8.24. Some mid-rise development is scattered amongst residential neighbourhoods in accessible locations, such as between Raynes Park and Wimbledon Centres, and along major roads such as Worple Road and Kingston Road. There is an opportunity to strengthen this development pattern, where mid-rise development will complement the surrounding character in locations such as Worple Road, and neighbourhood parades such as Wimbledon Chase. New development in these locations should generally be classified as mid-rise and should not be ‘significant taller’ than surrounding development or should not significantly alter the skyline.”

7.5.24 The location of the site would allow for long distance views of the development from surrounding vantage points and would be visually prominent. However, the delivery of the site for additional housing would provide a significant contribution towards meeting the housing needs of the borough and Members will wish to consider whether the design is of a sufficiently high quality to justify the proposed massing and height in reaching their conclusions on the proposal.

7.5.25 While supplementary planning guidance can assist in guiding place making and help inform and enable more precise judgements on matters of massing, such as was the case with the redevelopment of the Rainbow Industrial estate, High Path, Ravensbury and Eastfields estates, planning officers have weighed up both the policies on design and tall buildings and set this against the known and likely housing targets. On balance officers conclude that a tall buildings approach to development in this instance could be supported.

7.5.26 Given the site uniquely forms part of Wimbledon Chase Station and is located on a major corridor there is potential to achieve a high density scheme that is taller than its surroundings.

Layout

7.5.27 The proposed building would address both Kingston Road and Rothesay Avenue. The layout, with the commercial unit to the frontage would follow the pattern of surrounding development. Initially, concerns were raised by Officers in that the station entrance was in danger of being marginalised. However, changes to the signage are such that the station entrance would remain reasonably prominent.

7.5.28 The layout is based on sound urban design principles, with the main outlooks to the east, west and south and not over the immediately adjacent neighbours to the north.

Design and appearance

7.5.29 Paragraph 130 of the NPPF advises that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.

7.5.30 The change of material and massing between the ‘head’ and ‘body’ of the proposal creates a more visually slender building towards Kingston Road.

7.5.31 It is clear that the character of the building, particularly the ‘head’, has taken influence from the art deco style of neighbouring buildings and proposes a contemporary interpretation of this which is supported.

7.5.32 The revised material pallet and detailing is welcomed. In particular the horizontal banding that flows between brick detailing, balustrade design and window transom is

supported. A mock up panel of the façade that shows the brick cladding and detailing, glazing with aluminium panels and balustrade detailing will be reviewed as a condition to ensure the quality of the architecture reflects the ambitions of the application.

7.5.33 The new station entrance is well integrated with the building design which is supported. The canopy that spans from the station entrance through to Rothesay Avenue is particularly successful in creating a prominent station approach from the east that leads you directly to the entrance.

7.5.34 The architectural treatment of the building is considered to be a reasonable response to the local context.

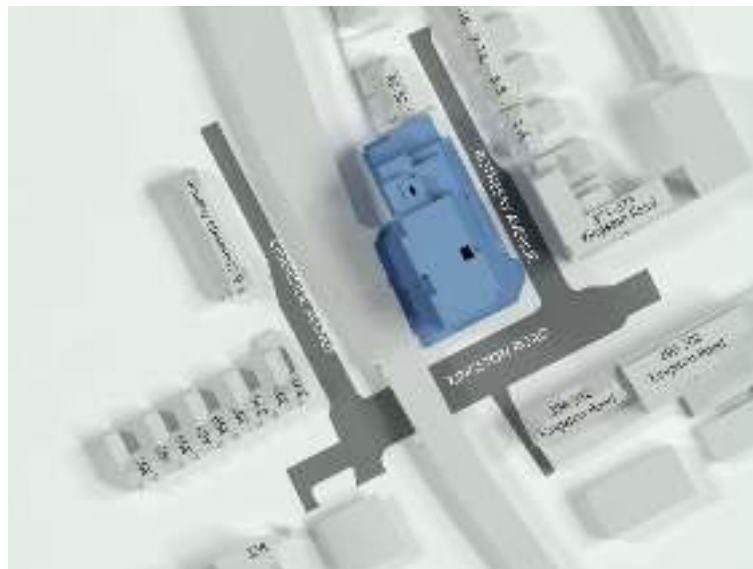
7.6 Impact upon neighbouring amenity

7.6.35 Planning Policy D6 (Housing quality and standards) of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

7.6.36 Planning policy CS policy 14 of Merton's Core Planning Strategy and policy DM D2 of Merton's Sites and Policies Plan seek to ensure new developments does not unacceptably impact on the amenities of the occupiers of any adjoining and nearby surrounding properties. Planning policy DM D2 (Design considerations in all developments) states that amongst other planning considerations that proposals will be expected to ensure provision of appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens.

7.6.37 Policy DM EP2 (Reducing and mitigating noise) states that development which would have a significant effect on existing or future occupiers or local amenity due to noise or vibration will not be permitted unless the potential noise problems can be overcome by suitable mitigation measures.

7.6.38 Image below shows application site and adjoining residential properties for Member information.



Source – from applicant's sun and daylight report (application site - proposed buildings in blue)

Overlooking/visual intrusion

- 7.6.39 Officers acknowledge that a degree of overlooking and visual impact would take place between the proposal and neighbouring properties due to the design, form and height of the proposal, however this is inevitable and not uncommon in an urban setting. The proposed building would be separated from neighbouring properties by either public highways or the railway (other than properties on Rothesay Avenue to the north which will be discussed below) and the level of separation distances between neighbours would be consistent within an urban setting. Planning conditions will be required to prevent adverse overlooking from some balconies (some side screens required) and screening to the communal amenity spaces.

49-52 Rothesay Avenue

- 7.6.40 The proposed building would stand directly to the south of the neighbouring residential maisonettes. The main impact would be to the flank elevation of the neighbouring building, whereby the impact would be limited. However, the impact on the outside garden space is also a consideration. The proposed building has been staggered to create a transition to the neighbouring residential properties, with roof terraces to be screened, or set back so as to not allow overlooking. The bulk and mass of the building would have some minor adverse impact in terms of outlook from the garden spaces. However, overall, the setting back of the building at various floors, is considered sufficient to avoid a materially harmful impact to these neighbouring properties.

Daylight and Sunlight

- 7.6.41 The Building Research Establishment (BRE) numerical guidelines should be considered in the context of the National Planning Policy Framework (NPPF), which stipulates that local planning authorities should take a flexible approach to daylight and sunlight to ensure the efficient use of land. The NPPF states:

“Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

- 7.6.42 The application is accompanied by a Sunlight and Daylight Analysis. The report states that whilst there would be some reductions in light to individual windows, the retained daylight levels are in line with those generally considered typical of urban development.

1-2 Rothesay Avenue

- 7.6.43 1-2 Rothesay Avenue is located directly opposite the northern part of the site and currently looks towards the two storey neighbours at 45 and 474 Rothesay Avenue as well as the single storey section of the station.



Source – from applicant's sun and daylight report (image shows 1-4 Rothesay Avenue)

- 7.6.44 When considering the proportional Vertical Sky Component (VSC) reduction the two forward living rooms fall below the BRE target to 0.55 times their former value with absolute retained mean VSC values of between 13.3% and 14.6%. The No Sky-line Contour (NSC) values fall to 0.45 and 0.46 times their former value for both the ground and first floor living spaces. Reductions in Annual Probable Sunlight Hours (APSH) are noted to the ground and first floor living rooms to just below the overall target of 25% to 22% and 24% respectively.
- 7.6.45 Officers note that given that these properties currently benefit from an unusually open outlook over the lowest part of the station any meaningful development of the site would result in reductions of a similar level.
- 7.6.46 Notwithstanding the above, the windows facing the site are obstructed by a large evergreen tree which indicates that the impacts of the scheme are unlikely to be noticeable to the occupants.

3-4 Rothesay Avenue

- 7.6.47 3-4 Rothesay Avenue (adjoining 1-2 Rothesay Avenue) also sees reductions to the mean VSC value for the ground and first floor bay windows serving the living rooms. Proportional retention values fall to 0.61 times their former value. Absolute retained VSC levels for the main part of the bay window are retained at between 16.9% and 18.9% for the living room and 16.1% for the bedroom; which are in keeping with the levels that are considered typical of urban development.

5-6 Rothesay Avenue

- 7.6.48 Moving northwards, away from the site, the impacts are lesser. Nos. 5-6 will have a retained VSC of 20.2% and 22.6% respectively to the ground and first floor main bay window, serving the living rooms. Whilst the retained VSC values fall outside of the 27% target, retained values are considered to be appropriate for an urban location.
- 7.6.49 In respect of direct sunlight marginal reduction of 1% below the target for winter sun is noted to affect the ground floor living space. This room will continue to significantly exceed the target for annual sunlight levels and this limited effect to winter sunlight will not materially affect the use of the space. A reduction in NSC (No Sky Contour, also known as No sky Line – NSL) is noted to affect the ground floor living room although this does retain a proportional value of 0.75.

7-10 Rothesay

7.6.50 The impacts to these properties is less than the units closer to the application site.

49-52 Rothesay Avenue

7.6.51 49-52 Rothesay Avenue are located directly to the north of the site and are designed differently to the maisonettes on the opposite side of the street.



Street view accessed on 13 April 2023 from Google Maps

7.6.52 No. 49-50 Rothesay Avenue has a number of flank facing windows which look directly towards the application site with a separation of approximately 3.5m. The flank windows at ground and first floor level (W1) are secondary windows to dual aspect kitchens which is also served by a main forward-facing window overlooking the street which is unaffected by the proposals. The kitchens will retain a mean absolute VSC of 16.5% which is considered to be broadly typical of urban development.



Image 5 - First floor plan showing affected secondary kitchen window

290-302 Kingston Road

7.6.53 Located on the opposite side of Kingston Road to the southeast of the application site

is a four storey terrace (top floor set back) with commercial at ground floor and flats above.



Source – from applicant's sun and daylight report

7.6.54 The results of the daylight assessment show that all windows in this property will retain a proportional VSC of at least 0.87 times their former value with virtually no change in NSC levels. The daylight effects to the residential elements of this neighbour fully comply with the BRE guideline targets. With regards to sunlight none of the main living spaces to this property which face the site are within 90 degrees of due south and, as such, they are not relevant for assessment.

304-312 Kingston Road

7.6.55 Located on the opposite side of Kingston Road to the south of the application site is a three storey terrace with commercial at ground floor and flats above.



Source – from applicant's sun and daylight report

7.6.56 The results of the daylight assessment show marginal impacts to four of the five bedrooms at second floor level which have a direct view of the proposed scheme. The impacts to these bedrooms are not significantly below the 0.8 factor target, with two of these bedrooms retaining a proportional value of 0.64 at second floor which is considered a moderate effect. The two at first floor retaining a proportional value of 0.71 & 0.74 which is a minor effect.

7.6.57 Absolute retained VSC values are between 14.1% and 15.3% which are considered to be typical of an urban location. The results of the NSC assessment confirm little to no change in retained values, all above 0.98 times the former, thus fully compliant with the BRE target.

328 Kingston Road

7.6.58 Located on the opposite side of Kingston Road to the southwest of the application site beyond the railway bridge is a four storey terrace block of flats.



Source – from applicant's sun and daylight report

7.6.59 Due to the separation distances, the impact to this property would be minimal.

BP Petrol Station, Kingston Road

7.6.60 Located on the opposite side of Kingston Road to the southwest of the application site beyond the railway bridge is the BP petrol station and forecourt. Given the commercial nature of the use, there would be no undue loss of light.

391 Kingston Road

7.6.61 Located on the opposite side of railway lines to the west of the application is a two storey house at the junction of Kingston Road and Chaseside Avenue. As shown below, the property includes a number of flank windows directed towards the railway embankment and application site beyond.



Source – from applicant's sun and daylight report

7.6.62 The results of the VSC analysis indicates that all windows in this property serving habitable rooms will retain proportional values of at least 0.8 and meet the BRE targets. A marginal shift in NSC is noted to affect one room at ground floor level which is likely to be a circulation space served by the glazed door.

7.6.63 The majority of the living spaces in this property are not orientated within 90 degrees of due south and therefore not relevant for inclusion in the sunlight element of the daylight/sunlight assessment. The two that are relevant both retain APSH values well in excess of the BRE target for sunlight.

1-6 Chaseside Avenue

7.6.64 Located on the opposite side of railway lines to the northwest of the application are two storey terraced house facing towards the railway embankment and part of the rear section of the application site.



Street view accessed on 13 April 2023 from Google Maps

7.6.65 Due to the separation distances, the impact to these properties would be minimal.

371-373 Kingston Road

7.6.66 Located to the east of the application site on the opposite corner of Rothesay Avenue, the building comprises a 5 storey block of flats (lowering in height at the rear) with commercial and ground floor and flats above. The building includes windows facing onto Kingston Road, corner balconies, side windows facing towards the application

site and amenity spaces of the lower flat roof elements at the rear.



Source – from applicant’s sun and daylight report

7.6.67 The flats at 371-373 Kingston Road are the primary site constraint and have a number of living spaces and bedrooms that are set behind or beneath balconies which limit sky visibility. The BRE guide recognises the effect that such features may have in increasing the sensitivity of such windows. In accordance with the guidelines, the applicant has undertaken a further assessment with the balconies removed to quantify this effect

7.6.68 The application site is currently underutilised with single storey station being lower than all immediate neighbours and not maximising the site footprint. The optimisation and intensification of the site above a transport hub will inevitably lead to a change in scale and amenity levels to the neighbours. It is also therefore relevant to carry out a ‘mirrored’ or contextual baseline assessment to the most affected windows of neighbouring properties. This method involves mirroring the existing affected neighbour to use that as a baseline to quantify the overall impact.

7.6.69 In scenarios where neighbouring windows are particularly close to the site boundary Appendix F of the BRE guidelines suggest that a development responds appropriately to its surroundings that the targets be set to those for a ‘mirror-image’ building of the same height and an equal distance away on the other side of the boundary.



Image 12 - Mirrored baseline model.

Source – from applicant's sun and daylight report

- 7.6.70 The results of the mirrored assessment show that even developing only to the height of 371-373 Kingston Road would result in the most constrained LKD windows, those set into the recessed terraces, being reduced to levels of between c.5.5% VSC and 7.5% VSC. The differential between these mirrored levels and the proposed scheme is less than 2% in absolute VSC terms and would broadly be unnoticeable to the occupants.
- 7.6.71 Therefore, there would be some impact to these neighbouring properties but given the urban context of the site, this impact is not considered to be unacceptable in planning terms.

Conclusion on loss of light

- 7.6.72 The existing site comprises a single storey building and therefore light levels to a number of neighbouring properties are currently high. Any development which increases the bulk and massing on site would therefore result in some degree of loss of light.
- 7.6.73 The submitted daylight and sunlight assessment shows that there would be some noticeable loss of light to nos. 1-6 Rothesay Avenue, 49-52 Rothesay Avenue, 304-312 Kingston Road and 371-373 Kingston Road. However, where the targets are not reached, the shortfall is relatively minor. In addition, retained values of light in an urban area are expected to be limited and therefore whilst the targets are not maintained for all neighbouring windows, the overall impact on light is considered to be typical of an urban area.

Conclusion on impact on neighbouring amenity

- 7.6.74 The proposed building would affect the privacy and outlook from neighbouring properties to some degree. In addition, there would be some loss of light to nearby residential properties. The proposed building has been designed to minimise these impacts but there would be an unavoidable impact over and above that created by the existing, single storey building.
- 7.6.75 Therefore, Officers advise that there would be some limited marginal impact on neighbouring properties, although this impact could be argued to be acceptable in planning terms. The limited impact on neighbouring amenity should be balanced against other considerations and benefits of the scheme.

7.7 Standard of accommodation

- 7.7.1 Planning Policy D6 (Housing quality and standards) of the London Plan 2021 states that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. The design of development should provide sufficient daylight and sunlight for future occupiers, have adequate and easily accessible storage space and maximise the provision of dual aspect dwellings (normally avoiding the provision of single aspect dwellings). All units must be designed to meet or exceed the minimum Gross Internal Area (GIA) standards as set out in Planning Policy D6 (Housing quality and standards).
- 7.7.1 The detailed design of the proposed development must have regard to the requirements of the London Plan (2021) in terms of unit and room sizes and provision of external amenity space. The requirements of SPP Policy DM D2 will also be relevant in relation to the provision of amenity space.
- 7.7.2 In terms of internal floor area and size of private amenity spaces, all units would meet

or exceed the minimum requirements of the London Plan. In addition, there would be communal roof terraces and a communal facility for residents at ground floor level. This would provide a good standard of accommodation, particularly in terms of communal amenity space, which would be a benefit to the scheme. The Council's Design officer confirms that the applicant has made significant changes to the internal lay-outs of the homes which is supported.

- 7.7.3 The proposed development would include 30 fully dual aspect units, 44 single aspect, with an additional step back to allow for dual aspect to the balcony and no fully single aspect units. There are no north facing single aspect units. The side returns to allow more light, whilst not classified as dual aspect, would provide a reasonably good level of internal lighting.
- 7.7.4 The proposed development would yield approximately 22 children (based on the GLA play space calculator), with a requirement for 220sqm of play space. A condition is recommended to ensure that part of the roof terraces are suitably landscaped and equipped with suitable play equipment.
- 7.7.5 The retail unit would be shallow with no area for storage or commercial waste. The applicant has indicated that the unit would likely be occupied by a café or convenience store, which would not require extensive servicing.
- 7.7.6 Overall, the standard of accommodation is considered to be acceptable.

7.8 Inclusive Design and Accessible Housing

- 7.8.1 Policy D5 (Inclusive Design) of the London Plan 2021 states that development proposal should achieve the highest standards of accessible and inclusive design. Inclusive design creates spaces and places that can facilitate social integration, enabling people to lead more interconnected lives. Development proposals should help to create inclusive neighbourhoods that cumulatively form a network in which people can live and work in a safe, healthy, supportive and inclusive environment.
- 7.8.2 Planning Policy D7 (Accessible housing) of the London Plan 2021 seeks to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that at least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 7.8.3 The building has been designed to comply with M4 standards of the Building Regulations with 90% meeting M4(2) and the remaining 10% meeting M4(3). The layout proposes two lift/stair cores, with 11 units per floor
- 7.8.4 The proposed development would meet the relevant requirements of the London Plan in terms of inclusive design and accessible housing.

7.9 Transport/Highways

- 7.9.1 Policy T6 of the London Plan states that the Mayor will support developments, which generate high levels of trips at locations with high levels of public transport accessibility and which improves the capacity and accessibility of public transport, walking and cycling. At a local level Policy CS.19 of the Core Planning Strategy states that the Council will ensure that proposals do not have an adverse effect on transport within the vicinity of the site. Policy CS.18 promotes active transport and encourages design that provides attractive, safe, covered cycle parking.

Car Parking

- 7.9.2 Planning Policy T6 Car parking of the London Plan 2021 states that Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.
- 7.9.3 The proposal does not provide for any car parking on site (other than two Network Rail parking spaces). Three blue badge holder spaces would be provided on Rothesay Avenue. The Council's Transport planner has raised objection on the basis that the blue badge holder parking would not be onsite. However, Officers note that the London Plan does allow in some instances for the provision of on-street disabled spaces. The London Plan Policy T6.1 (Residential Parking) requires that:
- "All disabled persons parking bays associated with residential development must:
- 1) be for residents' use only (whether M4(2) or M4(3) dwellings)
 - 2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling
 - 3) be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)."
- 7.9.4 The London Plan goes on to state that:
- "10.6.10 For car-free development, how provision will be made, including whether bays are provided on-site or on-street, should be clearly set out and justified, in line with relevant guidance and local policies."
- 7.9.5 The Council's Transport Planner has set out that "on-street disabled parking could only be considered on request by an individual occupier and should satisfy the Council's adopted criteria". In addition, the Transport Planner has confirmed that the on-street disabled parking spaces must be at least 6.6m in length (which they would achieve).
- 7.9.6 This on-street provision could not be reasonably secured for occupiers of the development, but it would add to the provision of disabled parking in the vicinity.
- 7.9.7 Ideally, blue badge parking would be provided onsite. However, the London Plan does allow for on-street blue badge parking in some instances and overall the layout of spaces are considered to be acceptable.
- 7.9.8 The lack of on-site blue badge parking should be weighed into the consideration of the application. As set out above, in an ideal situation, on-site spaces would be provided, however this is not feasible in this instance, and therefore officers do not consider that this matter would warrant a refusal of permission, especially when considered within the overall planning balance.
- 7.9.9 The comments/concerns of the Council's Transport planner in relation to parking have been carefully considered. However, the proposal does not involve the overall loss of any on-street parking bays, as the 4 that would be lost are all replaced on-street (in Rothesay Avenue in a 22.5m stretch of parking bays). In addition, the on-street motorcycle parking bay would not be affected by the proposed development, as it is to the opposite side of Rothesay Avenue and not part of any changes proposed in this application.
- 7.9.10 The site is within a Controlled Parking Zone and therefore, in order to minimise the

impact on the local highway network and to minimise impact on parking pressure, officers advise that the application should be subject to a s.106 agreement to preclude the issuing of parking permits to future occupiers.

Cycle Parking

- 7.9.11 Planning Policy T5 (Cycling) of the London Plan 2021 states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2. In accordance with Table 10.2, residential dwellings should provide 1 space per studio/1 person 1 bedroom dwelling, 1.5 spaces per 2 person 1 bedroom dwelling and 2 spaces per all other dwellings. For developments with 5-40 dwellings, 2 additional short stay spaces are required.
- 7.9.12 The level of cycle parking would exceed London plan policy requirements (142 spaces provided, with 125 required by policy – an overprovision of 18 spaces) and would also include specific spaces for oversize cycles, which is welcomed.
- 7.9.13 The cycle parking would be acceptable in planning terms.

Deliveries and Servicing

- 7.9.14 Policy CS20 of Merton's Core Planning Strategy states that the Council will require developments to incorporate safe access to and from the public highway as well as on-site parking and manoeuvring for emergency vehicles, refuse storage and collection, and for service and delivery vehicles.
- 7.9.15 Servicing requirements for the commercial unit would be limited, as it is a relatively small commercial unit. Servicing would be carried out from Kingston Road in the same manner as other commercial units along Kingston Road. The existing retail unit provides a forecourt which allows for small vehicles to provide servicing but large vehicles cannot turn on the existing site.
- 7.9.16 In order to facilitate servicing the proposal includes the provision of a partially enclosed layby to Kingston Road (3m by 17.5m). This arrangement would be similar to the existing layby to the east.
- 7.9.17 The Concerns raised by the Council's Transport Planner have been carefully considered. Officers note that the site is within a Neighbourhood Parade, whereby the provision of ground floor commercial uses is encouraged. The concept of having to provide off-street servicing would not be in-line with how other units along the Neighbourhood Parade are serviced, other than the Co-op supermarket and is not proportionate to the size of the commercial unit proposed.
- 7.9.18 The Council's Transport Planner has raised the issue of the future provision of a on-street cycle hire parking area. However, this would be adjacent to the existing bus stop on Kingston Road and would not prevent the unloading of vehicles using the proposed lay-by.
- 7.9.19 Therefore, Officers consider that the provision of a partially enclosed lay-by would allow for adequate servicing of the commercial unit and would also allow for any servicing requirements of the residential element.

Trip Generation

- 7.9.20 Trip generation would increase over the existing retail use. The proposed development would generate 48 two-way trips during the AM peak hour and 38 during the PM peak hour. However, this could be satisfactorily accommodated in the surrounding highway

network.

Construction process

- 7.9.21 The submitted Transport Assessments sets out that the new station entrance would be constructed whilst the existing entrance remains in operation, keeping impact on users to a minimum. The access would then be switched to the new entrance leaving the site clear for construction of the proposed retail and residential accommodation. The final details would be secured by way of a condition requiring the submission of a Construction Logistics Plan.

Conclusion on transport matters

- 7.9.22 The concerns raised by the Council's Transport Planner have been carefully considered. However, officers consider that the servicing requirements for the commercial unit would be limited given its design and modest size. Given the modest size and lack of ancillary storage/back of house facilities for the retail unit it is unlikely that the unit would be suitable as a local supermarket (which generally require a greater amount of servicing), however a planning condition can restrict a supermarket use. In addition, a planning condition restricting the size of the service vehicles can also assist in limiting impact on the highway network.

- 7.9.23 Whilst the Council's Transport Planner has raised some concerns with the proposal, officers need to consider all material planning considerations and whilst on-site blue badge space and servicing would be the ideal approach, in this instance the application site is limited in size and if onsite spaces/servicing were to take place this would significantly reduce the amount of development coming forward as part of any redevelopment aspirations. Officers have therefore placed more weight in the overall planning balance to optimising the potential of the site to deliver a new station entrance and 74 new homes, of which 12 units would be affordable housing.

7.10 Flooding and site drainage

- 7.10.24 London Plan policy SI 13, CS policy CS16 and SPP policies DM F1 and DM F2 seek to minimise the impact of flooding on residents and the environment and promote the use of sustainable drainage systems to reduce the overall amount of rainfall being discharged into the drainage system and reduce the borough's susceptibility to surface water flooding.

- 7.10.25 The site is within Flood Zone 1 (low probability of flooding) but is within an area at risk from surface water flooding.

- 7.10.26 The application is accompanied by a Flood Risk Assessment and SuDS report which sets out that both entrances to the station (pedestrian and Network Rail) are at risk of flooding during a Medium risk flood event (with climate change allowance). In this event flood depths of up to 0.9 m are anticipated in the location of the Network Rail entrance. Flood depths of up to 0.6 m are anticipated in the location of the pedestrian access to the station in the south. Therefore, a water entry strategy is recommended to preserve building integrity and to promote flood resilience rather than resistance (which is more difficult to achieve for significant flood depths). Potential strategies include:

- Ground floors designed to permit water passage at high flood depths;
- Hard flooring and flood resilient metal staircases;
- Heating systems, electrical sockets and utility meters should be raised above the predicted flood level where possible; and

- Sump and pump.

7.10.27 The Flood Risk Assessment goes onto recommend that it is likely the flood mitigation measures recommended for surface water (pluvial) risk will provide some mitigation of the Negligible-Low groundwater flood risk identified on Site. However specific groundwater measures that may also be considered include:

- Waterproof tanking of the ground floor;
- Interceptor drains;
- Automatic sump to extract flood water; and
- Non-return flap valves on the proposed foul and surface water sewer lines. A Site investigation is recommended for investigation of the extent and depth of the underlying secondary (A) aquifer and the depth to groundwater

7.10.28 In terms of SuDS, green roofs would provide water attenuation and would be secured by way of condition.

7.10.29 The EA were consulted and have raised no objection to the proposals. The Council's Flood Risk Officer has commented on the scheme raising no objection, subject to condition.

7.10.30 Subject to conditions, the impact on flooding and drainage is considered to be acceptable.

7.11 Sustainable design and construction

7.11.1 The London Plan requires that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy. Merton's Core Planning Strategy Policy CS15 Climate Change (parts a-d) requires new developments to make effective use of resources and materials, minimise water use and CO2 emissions.

7.11.2 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

7.11.3 A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
- 2) off-site provided that an alternative proposal is identified and delivery is certain.

7.11.4 The scheme proposes PV panels at roof top level along with the use of air source heat pumps.

7.11.5 The application will be subject to a legal agreement to provide the carbon offset contribution. The final amount is being calculated through further discussion with the applicant and Climate Change Officer in relation to the detailed methodology of the calculation. However, this is allowed for in the heads of terms and subject to condition and legal agreement, the proposal would be acceptable in terms of climate change considerations.

7.12 Air Quality

- 7.12.6 The whole of Merton is an Air Quality Management Area (AQMA).
- 7.12.7 The application is accompanied by an Air Quality Assessment which sets out that predicted pollutant levels were below the relevant criteria across the development. As such, the site is considered suitable for the proposed end use from an air quality perspective. Potential emissions from the proposals were assessed in order to determine compliance with the air quality neutral requirements of the London Plan. The building energy strategy does not produce emissions to atmosphere. In addition, the proposals are predominantly car free (only 2 spaces onsite). As such, the development was considered to be air quality neutral. Based on the assessment results, air quality issues are not considered a constraint to planning consent for the proposals.
- 7.12.8 The proposal is considered to be acceptable in terms of air quality, subject to conditions to minimise air pollution throughout the construction phase.

7.13 Biodiversity

- 7.13.9 Policy G6 of the London Plan sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 7.13.10 The site is predominantly buildings and hardstanding, with small patches of introduced shrubs, dense scrub and amenity grassland with a single small pond. There is some limited potential for bats in the existing building and the Preliminary Ecological Assessment recommends that further ecological surveys and assessment works have been recommended for the following (which are recommended to be secured by way of condition):
- Bat emergence/re-entry surveys (April to October)
 - Pre-construction walkover for badgers
- 7.13.11 The scheme includes green roofs, bio-diverse (brown) roofs and small landscaped gardens. In addition, climbers will be planted to grow up the buff-brown rear half of the northern flank wall.
- 7.13.12 Overall, biodiversity on the site would be improved and there would be an overall biodiversity net gain.

7.14 Urban Greening Factor and trees

- 7.14.13 Policy G5 of the London Plan sets out that Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential.
- 7.14.14 Policy G6 of the London Plan sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain, including sites not within areas of special protection.
- 7.14.15 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy

requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity.

- 7.14.16 In terms of urban greening the application does not include a specific calculation of the UGF. However, this matter will be addressed in the modification sheet to the committee.

7.15 Safety and Security considerations

- 7.15.1 Policy DMD2 sets out that all developments must provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles.
- 7.15.2 The layout and design of the building would be suitable in terms of designing out crime. The Secure By Design Officer has commented and recommends CCTV be included, computer controlled lighting, a management plan to address maintenance and management issues and a suitable set back from the railway lines.
- 7.15.3 These matters can be secured by condition. To clarify, the building is setback from the railway lines by over 7m (as the residential element does not oversail the station entrance), thereby creating a substantial setback from the railway lines, so as to not interfere with any operational requirements of the railway.
- 7.15.4 Officers recommend that a secured by design final certificate is controlled by way of condition.

7.16 Fire safety

- 7.16.5 Planning Policy D12 (Fire safety) of the of the London Plan 2021 highlights that fire safety of developments should be considered from the outset. How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the earliest possible stage to ensure the most successful outcomes are achieved, creating developments that are safe and that Londoners can have confidence living in and using.
- 7.16.6 Planning Policy D12 (Fire safety) of the London Plan 2021 states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
- 1) identify suitably positioned unobstructed outside space: for fire appliances to be positioned on appropriate for use as an evacuation assembly point.
 - 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
 - 3) are constructed in an appropriate way to minimise the risk of fire spread
 - 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
 - 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.
 - 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.
- 7.16.7 All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

7.16.8 The application is accompanied by two Fire Strategies (one dealing with policy matters and one dealing with national requirements) by Dr Jianqiang Mai, Associate Director of AESG UK Fire Engineering Division, Chartered Engineer, Member of Institute of Fire Engineers and 20 years Fire Engineering Experience) which sets out that a combination of internal compartmentation, smoke ventilation, and protection to external walls will prevent fire from spreading throughout the building or to neighbouring sites.

7.16.9 The building would be over 18m in height and therefore is required to be provided with a firefighting lift shaft. The Fire Strategy identifies that an automatic suppression system should be provided in line with the changes to Approved Document B as the building is over 11 meters. Provision for a smoke control system will be provided in the proposed building.

7.16.10 These matters would be secured under the Building Regulations. However, the submission demonstrates that matters of fire safety have been taken into account in the design and provides a satisfactory level of assurance that measures of fire safety will be addressed.

8. ENVIRONMENTAL IMPACT ASSESSMENT

8.1.1 The application does not constitute Schedule 1 or Schedule 2 development. Accordingly, there are no requirements in terms of EIA submission.

9. LOCAL FINANCE CONSIDERATIONS

9.1.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. The weight to be attached to a local finance consideration remains a matter for the decision maker. The Mayor of London's CIL and Merton CIL are therefore material considerations.

9.1.2 On initial assessment this development is considered liable for the Mayoral and Merton

CIL.

10. CONCLUSION

- 10.1.1 The existing site is underused and provides an opportunity for redevelopment. The balance of commercial and residential uses is considered to be acceptable in principle.
- 10.1.2 The proposal would provide housing, along with an improved pedestrian environment when entering the train station.
- 10.1.3 The scheme would suitably safeguard future step free access arrangements.
- 10.1.4 The proposal would provide over and above what has been concluded as financially viable in terms of affordable housing on site, which is a benefit to the scheme.
- 10.1.5 The building would be large in its context but officers consider that a landmark building would be suitable to this corner site, marking a transport node.
- 10.1.6 There would be some impact on neighbouring amenity which should be taken into account in the balancing of the key issues in the assessment.
- 10.1.7 It is noted that there are reservations in terms of servicing expressed by the Council's Transport Planner, however, the overall planning benefits of the scheme are considered to outweigh any concerns.
- 10.1.8 Other development control issues are considered to be acceptable as outlined above in the report.
- 10.1.9 Officers consider that the proposal is acceptable in planning terms, subject to conditions and a legal agreement and therefore the recommendation is for approval.

11. RECOMMENDATION

- 11.1 **GRANT** planning permission subject to conditions and s106 agreement securing the following:
- Affordable housing provision of 20% on site affordable housing by habitable room, 50/50 split between affordable rent and intermediate rent, including review mechanisms.
 - Carbon offset contribution (specific amount to be confirmed)
 - Travel Plan (provision of Travel Plan).
 - A sum of £2,000 (two thousand pounds) is sought to meet the costs of monitoring the travel plan over five years.
 - Relocation of parking bays on Kingston Road and Rothesay Avenue, provision of servicing bay, changes to highway layout and associated changes to road markings, to be covered by s.278 if required.
 - Restrict parking permits for all new units.
 - Details and management of provision of communal space at ground floor level for use by residents.
 - The applicant covering the Council's reasonable costs of all work in drafting S106 and monitoring the obligations.

Conditions

- 1 Commencement of development (Full Permission) - The development to which this permission relates shall be commenced not later than the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 (as amended) of the Town & Country Planning Act 1990.

- 2 Approved Plans - The development hereby permitted shall be carried out in accordance with the following approved plans:

2179-00-BR-0013 rev P02 DAS Addendum
2179-00-BR-0014 rev P01 VuCity Townscape Views
2179-00-SA-0012 rev P04 Schedule of Accommodation
2179-10-DR-0100 rev PL9 Ground Floor GA Plan
2179-10-DR-0101 rev PL9 1st Floor GA Plan
2179-10-DR-0102 rev PL9 2nd Floor GA Plan
2179-10-DR-0103 rev PL11 3rd Floor GA Plan
2179-10-DR-0104 rev PL10 4th Floor GA Plan
2179-10-DR-0105 rev PL10 5th Floor GA Plan
2179-10-DR-0106 rev PL10 6th Floor GA Plan
2179-10-DR-0107 rev PL10 7th Floor GA Plan
2179-10-DR-0108 rev PL10 8th Floor GA Plan
2179-10-DR-0109 rev PL8 Roof GA Plan
2179-10-DR-0401 rev PL6 Cross GA Section
2179-10-DR-0402 rev PL6 Longitudinal GA Section
2179-10-DR-0601 rev PL9 North GA Elevation
2179-10-DR-0602 rev PL9 East GA Elevation - Rothesay Avenue
2179-10-DR-0603 rev PL7 South GA Elevation - Kingston Road 2179-10-DR-0604 rev PL6 West GA Elevation - Station Side

Reason: For the avoidance of doubt and in the interests of proper planning

- 3 Materials to be Approved - No development shall take place until details of particulars and samples of the materials to be used on all external faces of the development hereby permitted, including window frames and doors (notwithstanding any materials specified in the application form and/or the approved drawings), have been submitted to the Local Planning Authority for approval. No works which are the subject of this condition shall be carried out until the details are approved, and the development shall be carried out in full accordance with the approved details.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policies D4 and D8 of the London Plan 2021, policy CS14 of Merton's Core

Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

- 4 Surface Treatment - No development shall take place until 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 have been submitted in writing for approval by the Local Planning Authority. No works that are the subject of this condition shall be carried out until the details are approved, and the development shall not be occupied / the use of the development hereby approved shall not commence until the details have been approved and works to which this condition relates have been carried out in accordance with the approved details.

Reason: To ensure a satisfactory standard of development in accordance with the following Development Plan policies for Merton: policy D4 of the London Plan 2021, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D1 and D2 of Merton's Sites and Policies Plan 2014.

- 5 No development shall commence until details of the proposed vehicular access to serve the development have been submitted in writing for approval to the Local Planning Authority. No works that are subject of this condition shall be carried out until those details have been approved, and the development shall not be occupied until those details have been approved and completed in full.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Policies Plan 2014.

- 6 The development hereby approved shall not be occupied until the proposed vehicle access has been sited and laid out in accordance with the approved plans

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Policies Plan 2014.

- 7 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.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Policies Plan 2014.

- 8** The vehicle parking area shown on the approved plans shall be provided before the commencement 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.

Reason: To ensure the provision of a satisfactory level of parking and comply with the following Development Plan policies for Merton: policy T6 of the London Plan 2021, policy CS20 of Merton's Core Planning Strategy 2011 and policy DM T3 of Merton's Sites and Policies Plan 2014.

- 9** 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.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Policies Plan 2014.

- 10** Development shall not commence until a working method statement has been submitted to and approved in writing by the Local Planning Authority to accommodate:

- (i) Parking of vehicles of site workers and visitors;
- (ii) Loading and unloading of plant and materials;
- (iii) Storage of construction plant and materials;
- (iv) Wheel cleaning facilities
- (v) Control of dust, smell and other effluvia;
- (vi) Control of surface water run-off.

No development shall be carried out except in full accordance with the approved method statement.

Reason: To ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and to comply with the following Development Plan policies for Merton: policies T4 and T7 of the London Plan 2021, policy CS20 of Merton's Core Planning Strategy 2011 and policy DM T2 of Merton's Sites and Policies Plan 2014.

- 11** Prior to the commencement of the development hereby permitted, a Construction Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented prior to the first occupation of the development hereby permitted and shall be so maintained for the duration of the use, unless the prior written approval of the Local Planning Authority is first obtained to any variation.

Reason: To ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and to comply with the following Development Plan policies for Merton: policies T4 and T7 of the London

Plan 2021, policy CS20 of Merton's Core Planning Strategy 2011 and policy DM T2 of Merton's Sites and Policies Plan 2014.

- 12** Drainage - Prior to the commencement of development, a detailed and final construction level detail for the provision of surface and foul water drainage shall be submitted to and approved in writing by the local planning authority for both phases of the development. The drainage scheme will dispose of surface water by means of a sustainable drainage system (SuDS) to include green roofs, blue roofs, rainwater harvesting and other Green Infrastructure SuDS measures, where possible. The final drainage scheme will discharge at a run-off rate of no more than 2l/s and an attenuation volume no less than 16.5m³, in accordance with drainage hierarchy contained within the London Plan Policy (SI 12, SI 13 and SPG) and the advice contained within the National SuDS Standards.

Reason: To reduce the risk of surface and foul water flooding to the proposed development and future users, and ensure surface water and foul flood risk does not increase offsite in accordance with Merton's policies CS16, DMF2 and the London Plan policy SI 12 and 13.

- 13** Flood Risk Assessment - The development shall be carried out in accordance with the submitted and updated Flood Risk Assessment by GeoSmart document reference: 75915.01R3 dated 022-11-16. All flood risk mitigation measures set out within the FRA, such as the flood risk resistance and resilience measures for example, must be implemented before operational use or occupancy of the site. All of the mitigation measures shall be retained and maintained thereafter throughout the lifetime of the development.

Reason : To reduce the risk of flooding to and from the proposed development and future occupants.

- 14** No development shall occur until a preliminary risk-assessment is submitted to the approval of the LPA. Then an investigation conducted to consider the potential for contaminated-land and shall be submitted to and approved in writing by the local planning authority.

Reason: To protect the health of future users of the site in accordance with policy 9.10.6 of the London Plan 2021 and policy DM EP4 of Merton's sites and policies plan 2014

- 15** No development shall occur until a remediation method statement, described to make the site suitable for, intended use by removing unacceptable risks to sensitive receptors, and shall be submitted to and approved in writing by the local planning authority.

Reason: To protect the health of future users of the site in accordance with policy 9.10.6 of the London Plan 2021 and policy DM EP4 of Merton's sites and policies plan 2014.

- 16** Prior to first occupation, the remediation shall be completed and a verification report, produced on completion of the remediation, shall be submitted to and approved in writing by the local planning authority.

Reason: To protect the health of future users of the site in accordance with policy 9.10.6 of the London Plan 2021 and policy DM EP4 of Merton's sites and policies plan 2014.

- 18** No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

- 19** No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

- 20** All deliveries to the commercial unit hereby approved shall be scheduled outside the network peak hours of 08:00-10:00 and 16:00-18:00 Monday to Friday.

Reason: To avoid congestion and reduce any impact on public safety.

- 21** Delivery and Servicing Plan - Development shall not commence until a Delivery and Servicing Plan (the Plan) has been submitted in writing for approval to the Local Planning Authority. No occupation of the development shall be permitted until the Plan is approved in writing by the Local Planning Authority and implemented in accordance with the approved plan. The approved measures shall be maintained, in accordance with the Plan, for the duration of the use, unless the prior written approval of the Local Planning Authority is obtained to any variation.

Reason: To ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and to comply with the following Development Plan policies for Merton: policies T4 and T7 of the London Plan 2021, policy CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3 and T5 of Merton's Sites and Policies Plan 2014.

- 22** If piling is proposed, prior to the commencement of development, a Piling Risk Assessment shall be undertaken (and submitted to and approved in writing by the Local planning Authority) to confirm the proposed design does not pose risks to the groundwater, This should be accordance with EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73". The development shall be carried out in accordance with the approved details.

Reason: Having regard to potential land contamination.

- 23** Security - The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy: Chapters 01B & 01C Merton New Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

- 24** Security - Prior to occupation a Secured by Design final certificate or its equivalent from the South West Designing Out Crime office shall be submitted to and approved by the Local Planning Authority.

Reason: In order to achieve the principles and objectives of Secured by Design to provide a safer environment for future residents and visitors to the site and reduce the fear of crime in accordance with Policy: Chapters 01B & 01C Merton New Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

- 25** Refuse & Recycling (Implementation) - The development hereby approved shall not be occupied until the refuse and recycling storage facilities shown on the approved plans have been fully implemented and made available for use. These facilities shall thereafter be retained for use at all times.

Reason: To ensure the provision of satisfactory facilities for the storage of refuse and recycling material and to comply with the following Development Plan policies for Merton: policies T4 and T7 of the London Plan 2021, policy CS17 of Merton's Core Planning Strategy 2011 and policy DM D2 of Merton's Sites and Policies Plan 2014.

- 26** Landscaping (Implementation) - All hard and soft landscape works shall be carried out in accordance with the approved details as in the approved drawings. The works shall be carried out in the first available planting season following the completion of 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 same approved specification, unless the Local Planning Authority gives written consent to any variation. All hard surfacing and means of enclosure shall be completed before the development is first occupied.

Reason: To enhance the appearance of the development in the interest of the amenities of the area, to ensure the provision sustainable drainage surfaces and to comply with the following Development Plan policies for Merton: policy G7 of the London Plan 2021, policies CS13 and CS16 of Merton's Core Planning Strategy 2011 and policies DM D2, F2 and O2 of Merton's Sites and Policies Plan 2014.

- 27** Wheelchair Accessible Homes - Not less than 10% of the dwelling units hereby permitted shall be constructed shall be wheelchair accessible throughout or easily adaptable for residents who are wheelchair users and shall be retained as such unless otherwise agreed in writing with the Local planning Authority.

Reason: To ensure the housing stock addresses the housing needs of disabled persons and to comply with the following Development Plan policies for Merton: policies D7 and H12 of the London Plan 2021, policy CS8 of Merton's Core Planning Strategy 2011 and policy DM D2 of Merton's Sites and Policies Plan 2014.

- 28** Green roofs: full details of a planting scheme, and the design and method of construction of the green and brown roofs shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved following the completion of the development or prior to the occupation of any part of the development, whichever is the sooner.

Reason: to protect and enhance the biodiversity of the development in the interest of nature conservation and to comply with the following development policies for Merton: policy G5 of the London Plan 2021; policy CS13 of Merton's core planning strategy 2011 and policy DMO2 of Merton's sites and policies plan 2014.

- 29** Urban Greening Factor - The development hereby permitted shall not be occupied until the Urban Greening factors set out in the approved plans and documents have been fully implemented and shall be permanently maintained as such thereafter to the satisfaction of the Local Planning Authority.

Reason: to protect and enhance the biodiversity of the development in the interest of nature conservation and to comply with the following development policies for Merton: policy G5 of the London plan 2021; policy CS13 of Merton's core planning strategy 2011 and policy DMO2 of Merton's sites and policies plan 2014.

- 30** 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 manage and prevent further deterioration of existing low quality air across London in accordance with London Plan policies GG3 and SI1, and NPPF 181.

- 31** Noise levels, (expressed as the equivalent continuous sound level) LAeq (15 minutes), from any external plant/machinery across the site shall not exceed LA90-10dB at the boundary with the closest residential property.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies D4 and D14 of the London Plan 2021 and policies DM D2, DM D3, DM EP2 and DM EP4 of Merton's Sites and Policies Plan 2014.

- 32** Any external lighting shall be positioned and angled to prevent any light spillage or glare beyond the site boundary and in accordance with Institution of Lighting Professionals, The Reduction of Obtrusive Light Guidance Note 01/21.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies DM D2 and DM EP4 of Merton's Sites and Polices Plan 2014.

- 33** BREEAM - New build non-residential (Pre-Commencement) - No development shall commence until a copy of a letter from a person that is

licensed with the Building Research Establishment (BRE) or other equivalent assessors as a BREEAM - Pre-Commencement (New build non-residential) assessor that the development is registered with BRE under BREEAM (either a 'standard' BREEAM or a 'bespoke' BREEAM) and a Design Stage Assessment Report showing that the development will achieve a BREEAM rating of not less than the standards equivalent to 'Very Good' has been submitted to and approved in writing by the Local Planning Authority. The submission shall also include evidence to show how the development will meet the London Plan C02 reduction targets (equivalent to minimum emissions reductions required to achieve BREEAM excellent).

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources and to comply with the following Development Plan policies for Merton: policies SI 2, SI 3 and SI 5 of the London Plan 2021 and policy CS15 of Merton's Core Planning Strategy 2011.

- 34** The mitigation and enhancements recommended in the submitted Preliminary Ecological Appraisal shall be carried out prior to the first occupation of the development hereby approved and maintained thereafter.

Reason: to protect and enhance the biodiversity of the development in the interest of nature conservation and to comply with the following development plan policies for Merton: policies G5 and G6 of the London plan 2021; policy CS13 of Merton's core planning strategy 2011 and policy DMO2 of Merton's sites and policies plan 2014.

- 35** No Use of Flat Roof - Access to the flat roof of the development hereby permitted, other than areas specifically identified as communal amenity spaces, shall be for maintenance or emergency purposes only, and the flat roof shall not be used as a roof garden, terrace, patio or similar amenity area.

Reason: To safeguard the amenities and privacy of the occupiers of adjoining properties and to comply with the following Development Plan policies for Merton: policies D3 and D4 of the London Plan 2021, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

- 36** Restriction on Music/Amplified Sound - No music or other amplified sound generated on the premises shall be audible at the boundary of any adjacent residential building.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policies D4 and D14 of the London Plan 2021, policy CS7 of Merton's

Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Policies Plan 2014.

- 37** Fire Strategy - The development shall be carried out in accordance with the provisions of the submitted Fire Statements and must fully comply with The Building Regulation 2010 (as amended) unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12.

- 38** Cycle Parking to be implemented - The development hereby permitted shall not be occupied until the cycle parking shown on the plans hereby approved has been provided and made available for use. These facilities shall be retained for the occupants of and visitors to the development at all times.

Reason: To ensure satisfactory facilities for cycle parking are provided and to comply with the following Development Plan policies for Merton: policy T5 of the London Plan 2021, policy CS18 of Merton's Core Planning Strategy 2011 and policy DM T1 of Merton's Sites and Policies Plan 2014.

- 39** Sustainability (Water Consumption) - The development shall be carried out in accordance with the measures set out in the submitted Energy Report (amended 03/11/2023). In addition, no part of the development hereby approved shall be occupied until evidence has been submitted to, and approved in writing by, the Local Planning Authority confirming that the development has achieved internal water consumption rates of no greater than 105 litres per person per day

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources and to comply with the following Development Plan policies for Merton: Policy SI 2 and SI 3 of the London Plan 2021 and Policy CS15 of Merton's Core Planning Strategy 2011.

- 40** Delivery vehicles serving the development in the operational phase of development shall be limited to no greater than 10.0m in length.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Policies Plan 2014.

- 41** Landscaping - No development shall take place until full details of a landscaping and planting scheme, to include provision of children's play space and play space equipment has been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved before the commencement of the use or the occupation

of any building 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.

Reason: To enhance the appearance of the development in the interest of the amenities of the area, to ensure the provision sustainable drainage surfaces and to comply with the following Development Plan policies for Merton: policies G7 and D8 of the London Plan 2021, policies CS13 and CS16 of Merton's Core Planning Strategy 2011 and policies DM D2, DM F2 and DM O2 of Merton's Sites and Policies Plan 2014.

- 42** Restriction - Use of Premises - Notwithstanding the provision of the Town and Country Planning (Use Classes) Order 1987 (as amended), the commercial premises shall not be occupied as a supermarket.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Policies Plan 2014.

- 43** Removal of PD (Advertisements/signage) - Notwithstanding the provisions of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (or any Order revoking and re-enacting that Order with or without modification), no advertisement or fascia signage shall be displayed on the site unless advertisement consent is first obtained from the Local Planning Authority.

Reason: The Local Planning Authority considers that additional signage or advertisements could cause detriment to the character of the area and for this reason would wish to control any future Development plan policies for Merton: policy D4 of the London Plan 2021, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

- 44** Screening - Prior to the first occupation of the residential element of the development hereby approved, details of screening of the balconies to units N2.02 and N1.02 and to the northern sides of the communal roof terraces/gardens on the 3rd, 7th and 8th floors shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied unless the scheme has been approved and implemented in its approved form and those details shall thereafter be retained for use at all times from the date of first occupation.

Reason: To safeguard the amenities and privacy of the occupiers of adjoining properties and to comply with the following Development Plan

policies for Merton: policy D3 and D4 of the London Plan 2021, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

- 45** Prior to the occupation of the development hereby approved, a plan to show how a future connection to a district heat network could be future-proofed. Shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the agreed plan.

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources and to comply with the following Development Plan policies for Merton: policies SI 2, SI 3 and SI 5 of the London Plan 2021 and policy CS15 of Merton's Core Planning Strategy 2011.

- 46** Prior to the first occupation of the residential element of the development hereby approved, all windows to the north facing elevation shall be obscurely glazed up to an internal sill height of at least 1.7m. Alternatively, prior to the first occupation of the residential element of the development hereby approved, a scheme for obscured glazing to windows to the north elevation shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To safeguard the amenities and privacy of the occupiers of adjoining properties and to comply with the following Development Plan policies for Merton: policy D3 and D4 of the London Plan 2021, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

1 INFORMATIVE

The applicant is advised to check the requirements of the Party Wall Act 1996 relating to work on an existing wall shared with another property, building on the boundary with a neighbouring property, or excavating near a neighbouring building. Further information is available at the following link:

<http://www.planningportal.gov.uk/buildingregulations/buildingpolicyandlegislation/currentlegislation/partywallact>

2 INFORMATIVE

This planning permission contains certain conditions precedent that state 'before development commences' or 'prior to commencement of any development' (or similar). As a result these must be discharged prior to ANY development activity taking place on site. Commencement of development without having complied with these conditions will make any development unauthorised and possibly subject to enforcement action such as a Stop Notice.

3 INFORMATIVE

It is Council policy for the Council's contractor to construct new vehicular accesses. The applicant should contact the Council's Highways Team on 020 8545 3829 prior to any work starting to arrange for this work to be done. If the applicant wishes to undertake this work the Council will require a deposit and the applicant will need to cover all the Council's costs (including supervision of the works). If the works are of a significant nature, a Section 278 Agreement (Highways Act 1980) will be required and the works must be carried out to the Council's specification.

4 **INFORMATIVE**

Details of the BREEAM assessment and a list of approved assessors can be found at www.breeam.org

5 **INFORMATIVE**

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via [https://urldefense.com/v3/__http://www.thameswater.co.uk__;!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtv-hQh6VLZfoWueIkIp0_WE4ek3NEYoJo-A_RtUBsu8w\\$](https://urldefense.com/v3/__http://www.thameswater.co.uk__;!!MOeJA3Fs6wML0Q!H9hEX9G9ow6BxDcarDjVEYcok9wRe3hgAo6mSovAZbsKkW7OK9aZnf_Df0hrtv-hQh6VLZfoWueIkIp0_WE4ek3NEYoJo-A_RtUBsu8w$)

6 **INFORMATIVE**

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 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.

7 **INFORMATIVE**

You are advised to contact the Council's Highways team on 020 8545 3700 before undertaking any works within the Public Highway to obtain the necessary approvals and/or licences. Please be advised that there is a further charge for this work. If your application falls within a Controlled Parking Zone this has further costs involved and can delay the application by 6 to 12 months.

8 **INFORMATIVE**

The footway and carriageway on the A238 Kingston Road should not be blocked during the development works. Temporary obstructions during the works should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A238 Kingston Road. All vehicles should only

park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions.

9 **INFORMATIVE**

No surface water runoff should discharge onto the public highway including the public footway or highway. When it is proposed to connect to a public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required (contact no. 0845 850 2777).

No waste material, including concrete, mortar, grout, plaster, fats, oils and chemicals shall be washed down on the highway or disposed of into the highway drainage system.

10 **INFORMATIVE**

Any works/events carried out either by, or at the behest of, the developer, whether they are located on, or affecting a prospectively maintainable highway, as defined under Section 87 of the New Roads and Street Works Act 1991, or on or affecting the public highway, shall be co-ordinated under the requirements of the New Roads and Street Works Act 1991 and the Traffic management Act 2004 and licensed accordingly in order to secure the expeditious movement of traffic by minimising disruption to users of the highway network in Merton. Any such works or events commissioned by the developer and particularly those involving the connection of any utility to the site, shall be co-ordinated by them in liaison with the London Borough of Merton, Network Coordinator, (telephone 020 8545 3976). This must take place at least one month in advance of the works and particularly to ensure that statutory undertaker connections/supplies to the site are co-ordinated to take place wherever possible at the same time.

11 **INFORMATIVE**

Demolition of buildings should avoid the bird nesting and bat roosting season. This avoids disturbing birds and bats during a critical period and will assist in preventing possible contravention of the Wildlife and Countryside Act 1981, which seeks to protect nesting birds/bats and their nests/roosts. Buildings should also be inspected for bird nests and bat roosts prior to demolition. All species of bat in Britain and their roosts are afforded special protection under the Wildlife and Countryside act 1981. If bats are found, Natural England should be contacted for advice (tel: 020 7831 6922).

12 **INFORMATIVE**

In accordance with paragraph 38 of the NPPF, The London Borough of Merton (LBM) takes a positive and proactive approach to development proposals focused on solutions. LBM works with applicants/agents in a positive and proactive manner by:

- i) Offering a pre-application advice and duty desk service.

- ii) Where possible, suggesting solutions to secure a successful outcome.
- iii) As appropriate, updating applicants/agents of any issues that may arise in the processing of their application.

In this instance:

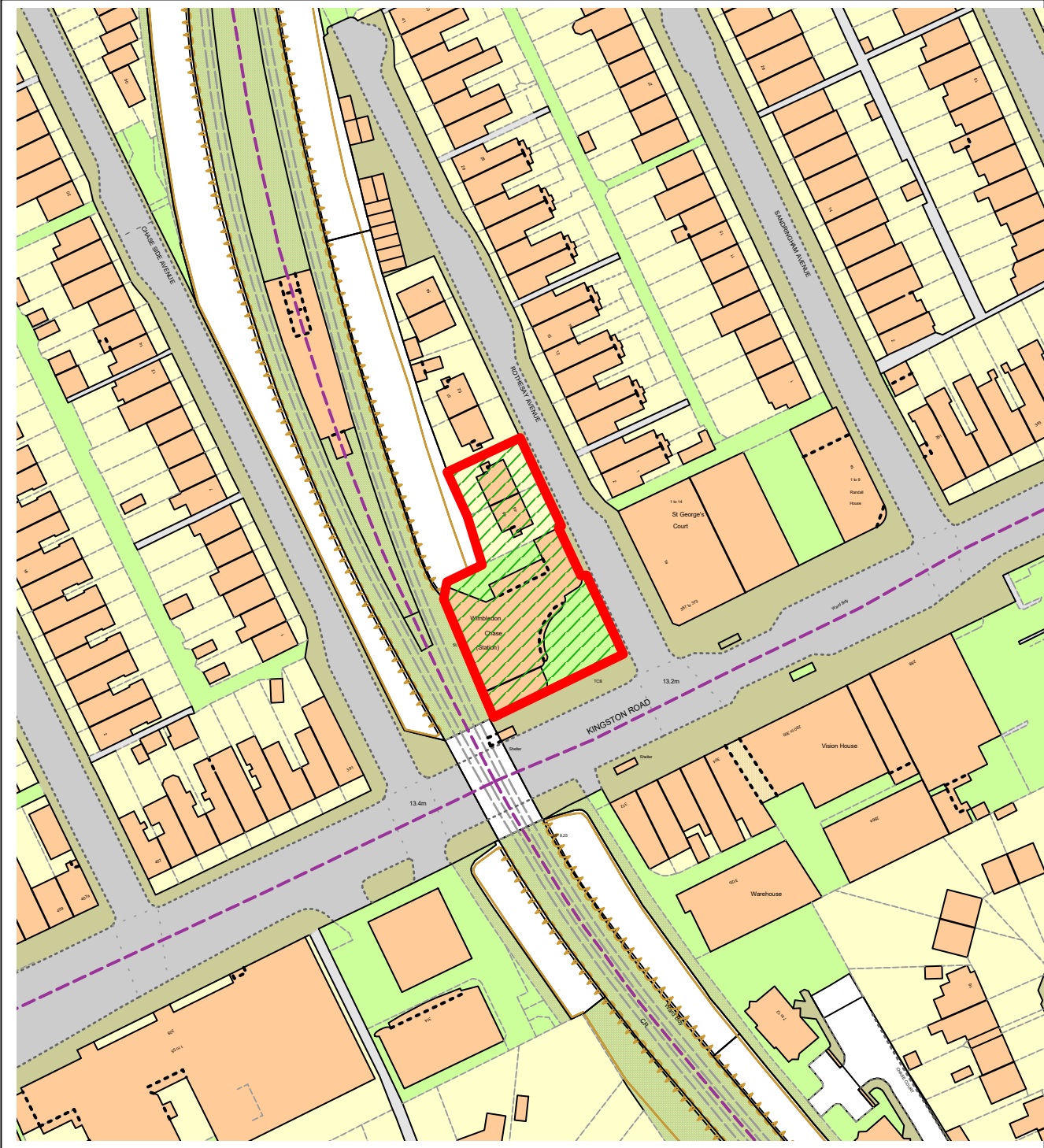
- i) The applicant/agent was provided with pre-application advice.
- ii) The applicant was offered the opportunity to submit amended plans in order to make the proposal acceptable in planning terms.
- iii) The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

INFORMATIVE

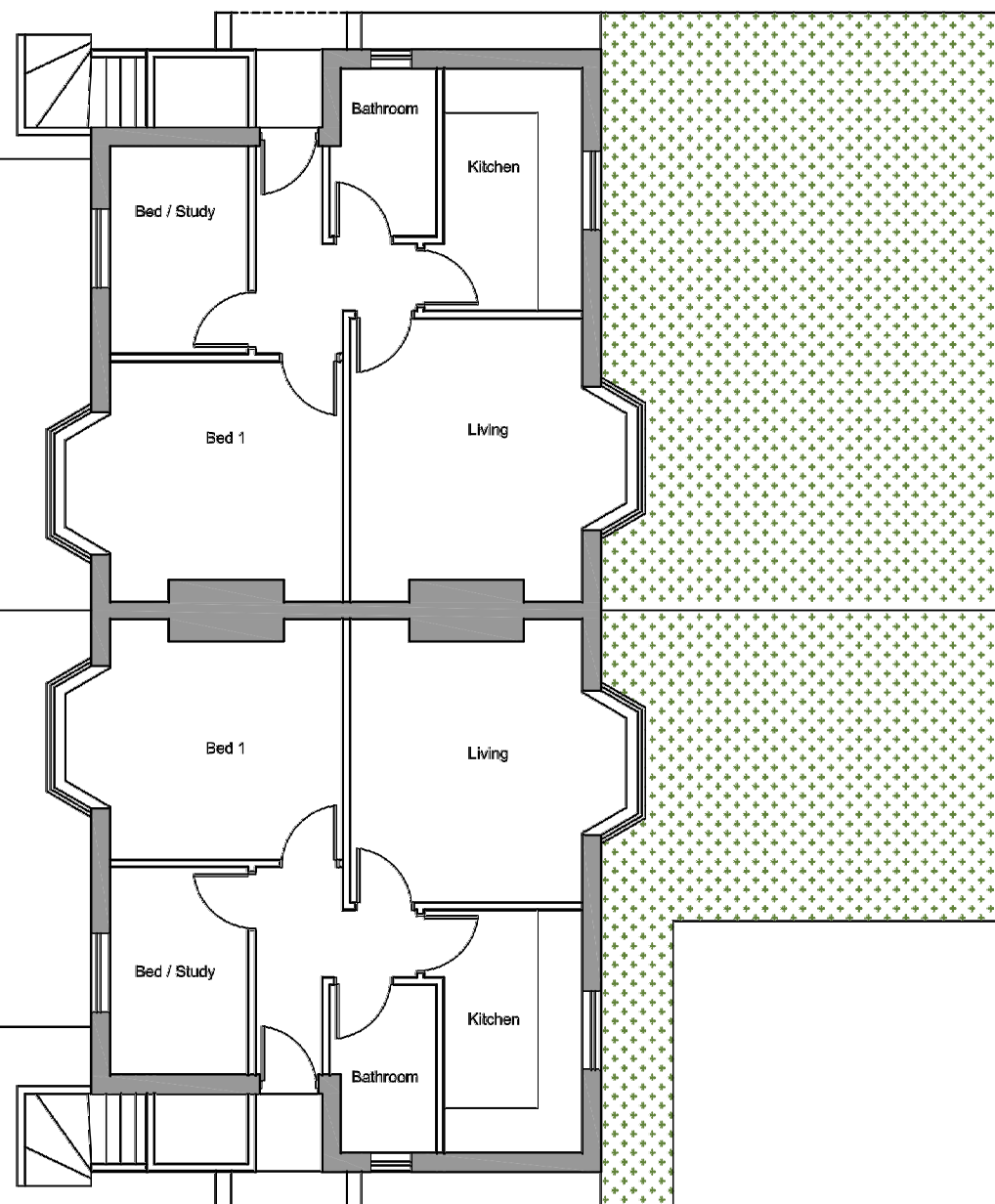
This permission creates one or more new units which will require a correct postal address. Please contact the Street Naming & Numbering Officer at the London Borough of Merton

Street Naming and Numbering (Business Improvement Division)
Corporate Services
7th Floor, Merton Civic Centre
London Road
Morden
SM4 5DX
Email: street.naming@merton.gov.uk

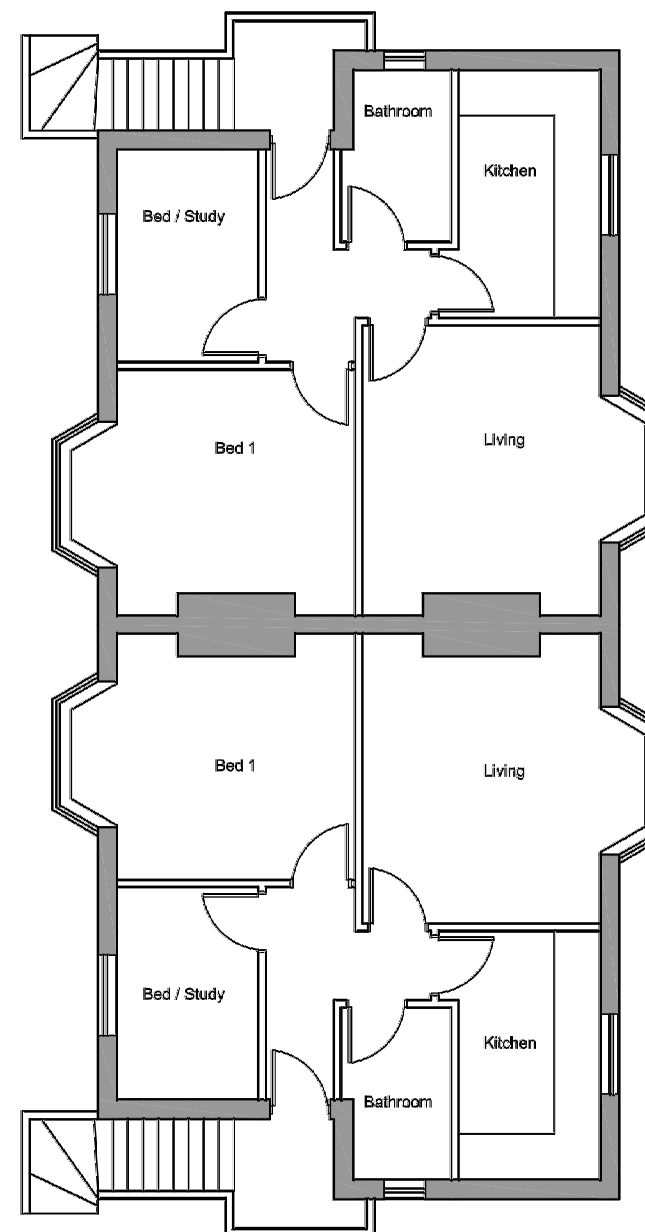
NORTHGATE SE GIS Print Template



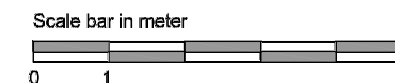
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1 Ground Floor



2 First Floor



Rev: PL2 Date: 28.01.22 Drn: VM Chk: SR
CZWG Address Amended. Issued for
Planning

Rev: PL1 Date: 07.12.21 Drn: VM Chk: SR
Issued for Planning

Do not scale off this drawing
Report all errors and omissions to the Archit
Dimensions to be checked on site

SHEET INFORMATION:

Plotted by: V.MAGNARIN
Plot date: 28 January 2022 17:20:01

Client:
Wimbledon Square Development
Limited

Project:
Wimbledon Chase Station

Title:
45 and 47 Rothesay Avenue
Existing Plans

Drawing status:
Planning

Scale @ A3
1:100

Drawing No: 2179-00-DR-0050
Rev: PL2



① Front Elevation



② Rear Elevation

Rev: PL2 Date: 28.01.22 Drn: VM Chk: SR
CZWG Address Amended. Issued for
Planning

Rev: PL1 Date: 07.12.21 Drn: VM Chk: SR
Issued for Planning

Do not scale off this drawing
Report all errors and omissions to the Archit
Dimensions to be checked on site

SHEET INFORMATION:

Plotted by: V. MAGNARIN
Plot date: 28 January 2022 17:21:08

Client:
Wimbledon Square Development
Limited

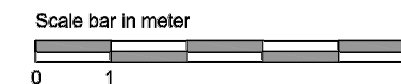
Project:
Wimbledon Chase Station

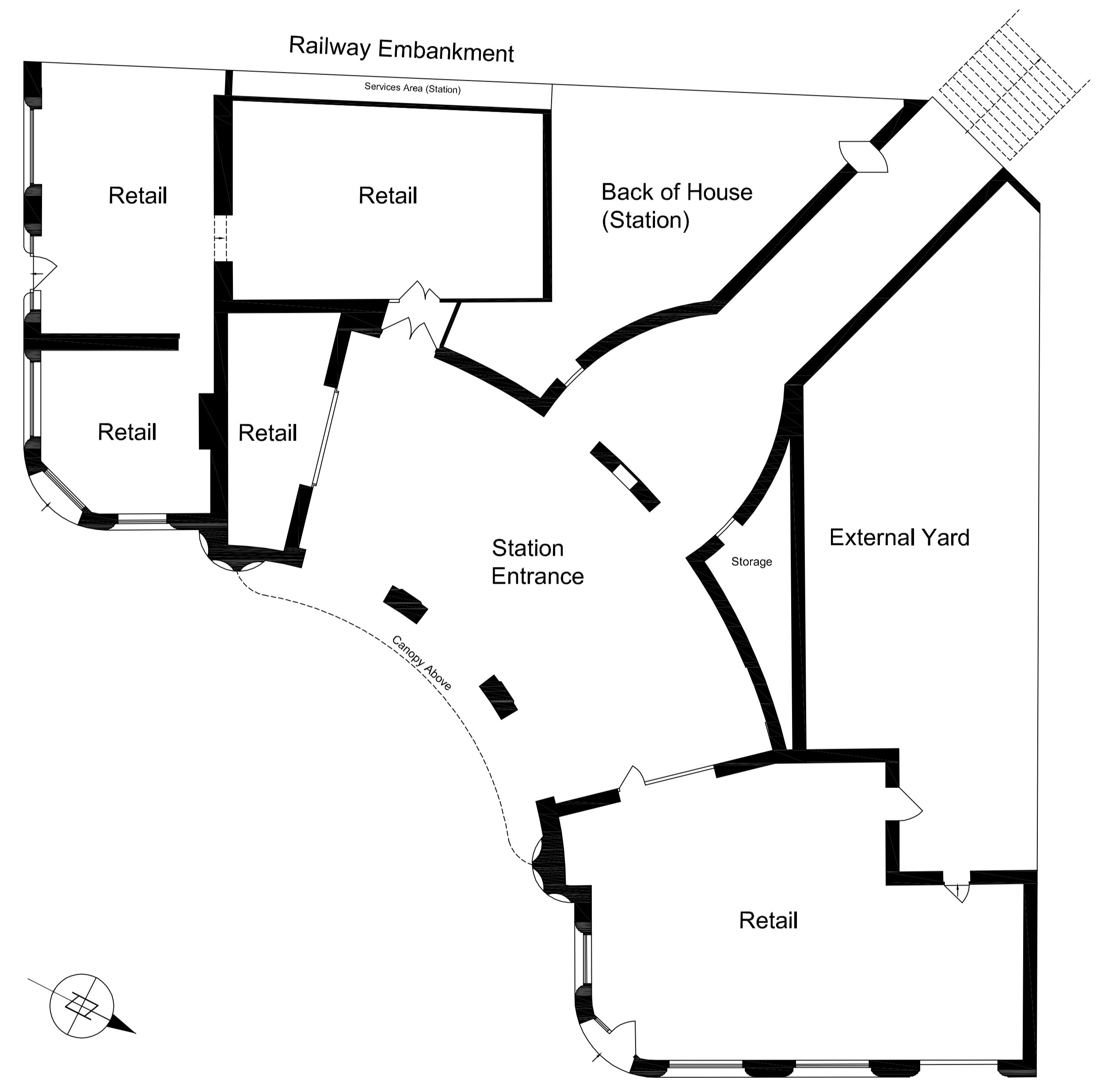
Title:
45 and 47 Rothesay Avenue
Existing Elevations

Drawing status:
Planning

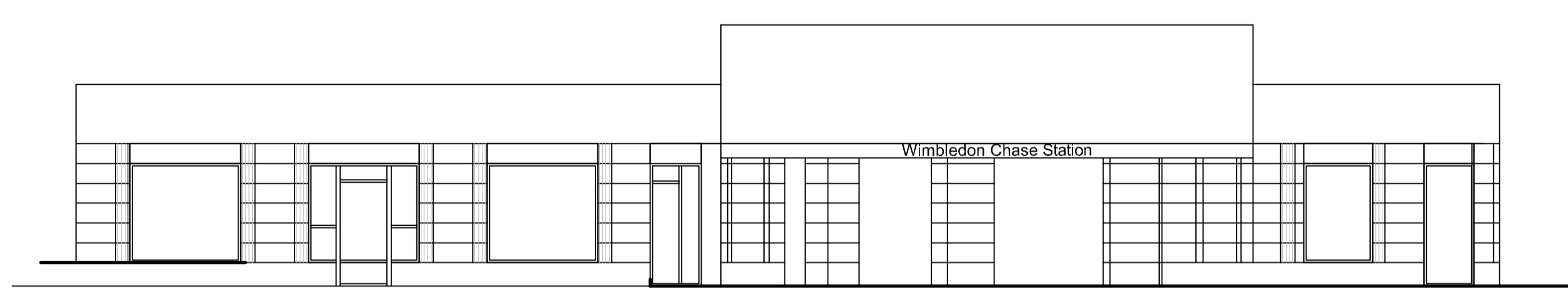
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Drawing No: 2179-00-DR-0051
Rev: PL2

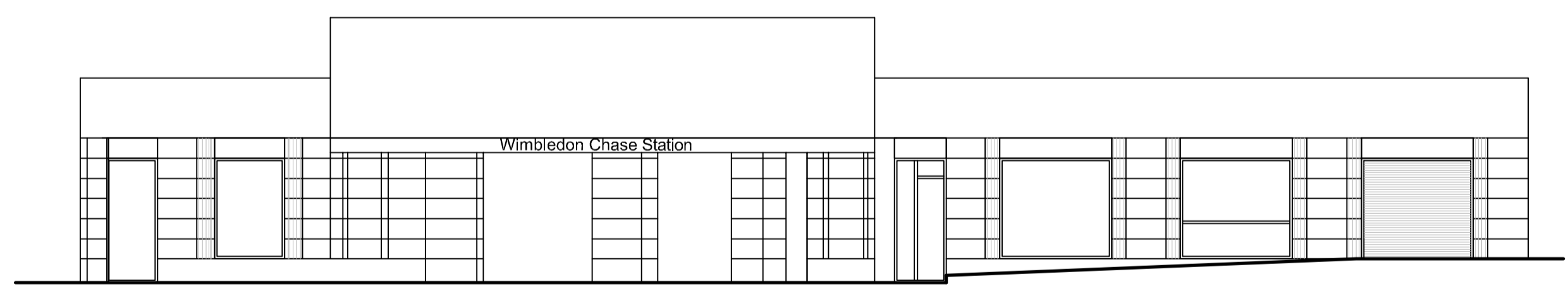




Plan



Elevation on Kingston Road



Elevation on Rothesay Avenue

Rev: PL3 Date: 28.01.2022 Dm: VM Chk: SR
 CZWG Address amended. Issued for Planning.
 Rev: PL2 Date: 10.12.2021 Dm: VM Chk: SR
 Issued For Planning.
 Rev: PL1 Date: 07.12.2021 Dm: VM Chk: SR
 Initial Issue.
 Do not scale off this drawing
 Report all errors and omissions to the Architect
 Dimensions to be checked on site
 SHEET INFORMATION:
 Plotted by: V.MAGNARIN
 Plot date: 28 January 2022 15:05:16

Client:
 Wimbledon Square Development
 Limited

Project:
 Wimbledon Chase Station

Title:
 Wimbledon Chase Station
 Existing Plan and Elevations

Drawing status:
 Planning

Material Key

1. Pale cream brick, vertical soldier courses, stretcher bond.
2. Warm buff/brown brick, stretcher bond.
3. Pale cream projecting soldier course brick detail.
4. Green-grey (RAL 7033) PPC-coated aluminium-faced windows.
5. Green-grey (RAL 7033) PPC-coated metalwork, copings and balustrades with hardwood timber handrail.
6. Dark green (RAL 6004) glazed pale cream ceramic signage with projecting lettering to match bricks.
7. Dark green (RAL 6004) back painted glass spandrel panels.
8. Grey-green (RAL 7033) louvred panels and doors to match windows.
9. Grey-green (RAL 7033) curtain walling.
10. GRC clad circular columns, pale cream colour to match brickwork.
11. Obscure glazed privacy screen.
12. Grey-green (RAL 7033) roller shutter to Network Rail service entrance.



Rev:PL9	Date:12.04.2023	Drw:CB	Chk:AW
Level 3 windows adjusted to new 4B6P flat.			
Rev:PL8	Date:27.03.2023	Drw:CB	Chk:AW
Horizontal brick banding added. Fire consultants comments incorporated.			
Rev:PL7	Date:02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL6	Date:23.01.2023	Drw:CB	Chk:AW
Revised Proposal			
Rev:PL5	Date:28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL4	Date:21.01.2022	Drw:VM	Chk:SR
Minor amendment to 7&8 floor; Issued for Planning			
Rev:PL3	Date:19.01.2022	Drw:DO	Chk:SR
Issued For Planning			
Rev:PL2	Date:13.12.2021	Drw:VM	Chk:SR
Spandrel Note added			
Rev:PL1	Date:03.12.2021	Drw:VM	Chk:SR
Initial Issue			

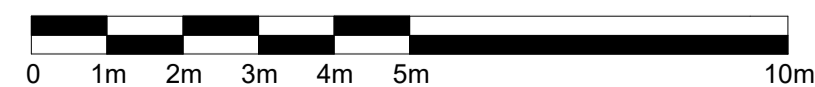
Do not scale off this drawing
Report all errors and omissions to the Architect
Dimensions to be checked on site
Plot date: 12/04/2023 14:34:30

Client:
Wimbledon Square Development Limited

Project:
Wimbledon Chase Station

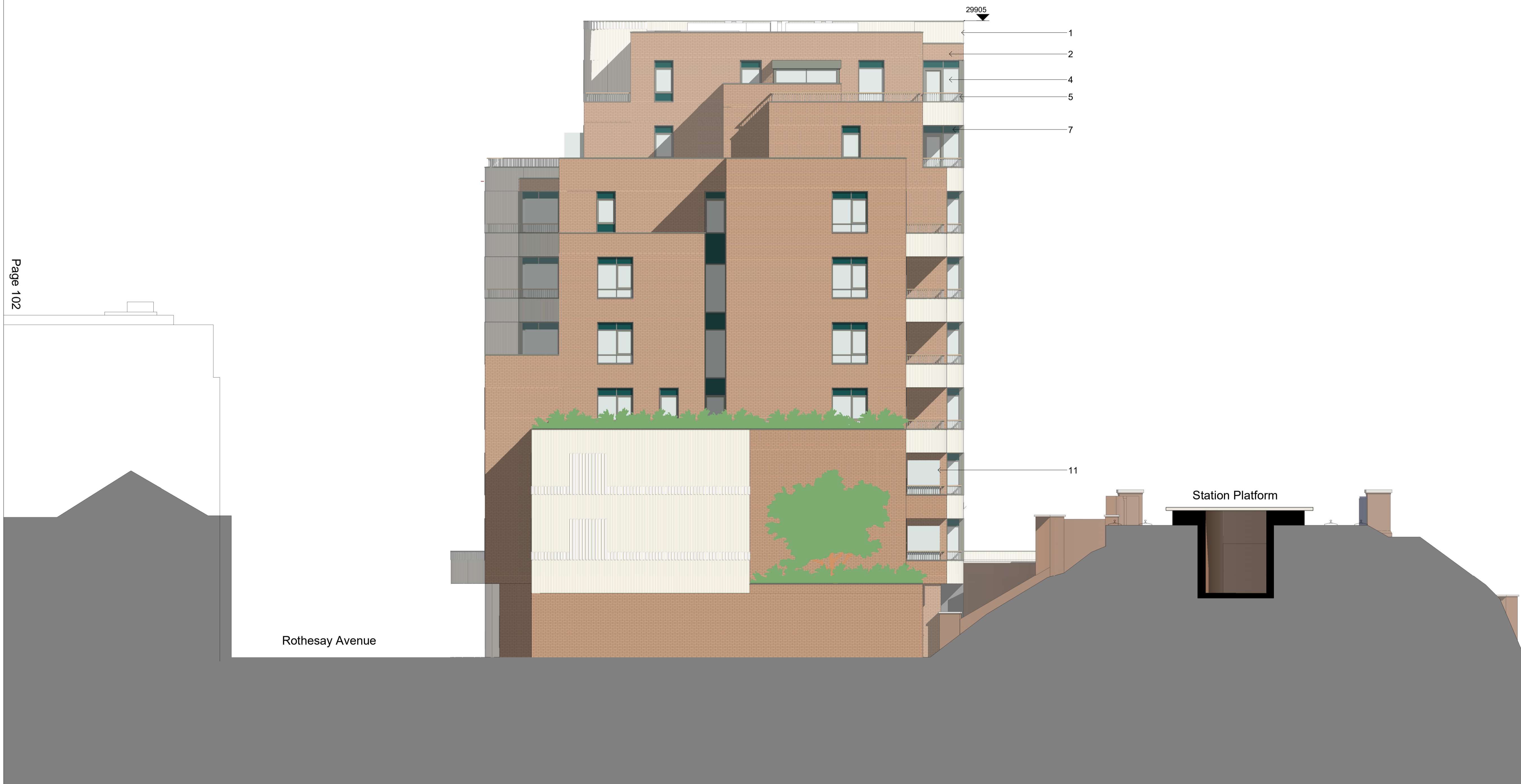
Title:
East GA Elevation - Rothesay Avenue

Drawing status:
Planning



Material Key

1. Pale cream brick, vertical soldier courses, stretcher bond.
2. Warm buff/brown brick, stretcher bond.
3. Pale cream projecting soldier course brick detail.
4. Green-grey (RAL 7033) PPC-coated aluminium-faced windows.
5. Green-grey (RAL 7033) PPC-coated metalwork, copings and balustrades with hardwood timber handrail.
6. Dark green (RAL 6004) glazed pale cream ceramic signage with projecting lettering to match bricks.
7. Dark green (RAL 6004) back painted glass spandrel panels.
8. Grey-green (RAL 7033) louvred panels and doors to match windows.
9. Grey-green (RAL 7033) curtain walling.
10. GRC clad circular columns, pale cream colour to match brickwork.
11. Obscure glazed privacy screen.
12. Grey-green (RAL 7033) roller shutter to Network Rail service entrance.



Rev:PL9	Date:12.04.2023	Drw:CB	Chk:AW
Level 3 windows adjusted to new 4B6P flat.			
Rev:PL8	Date:27.03.2023	Drw:CB	Chk:AW
Horizontal brick banding added. Fire consultants comments incorporated.			
Rev:PL7	Date:02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL6	Date:23.01.2023	Drw:CB	Chk:AW
Revised Proposal			
Rev:PL5	Date:28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL4	Date:21.01.2022	Drw:DO	Chk:SR
Minor amendment to 7&8 floor; Issued for Planning			
Rev:PL3	Date:19.01.2022	Drw:DO	Chk:SR
Issued For Planning			
Rev:PL2	Date:13.12.2021	Drw:VM	Chk:SR
Spandrel Note added			
Rev:PL1	Date:03.12.2021	Drw:VM	Chk:SR
Initial Issue			

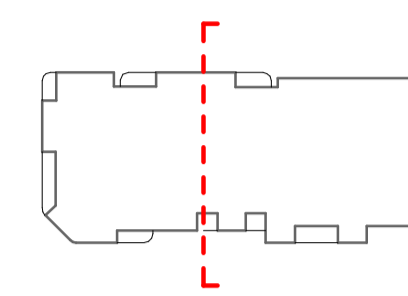
Do not scale off this drawing
Report all errors and omissions to the Architect
Dimensions to be checked on site
Plot date: 12/04/2023 14:34:10

Client:
Wimbledon Square Development Limited

Project:
Wimbledon Chase Station

Title:
North GA Elevation

Drawing status:
Planning



Level 9 (Roof)
FFL 28.710

Level 8
FFL 25.435

Level 7
FFL 22.360

Level 6
FFL 19.285

Level 5
FFL 16.210

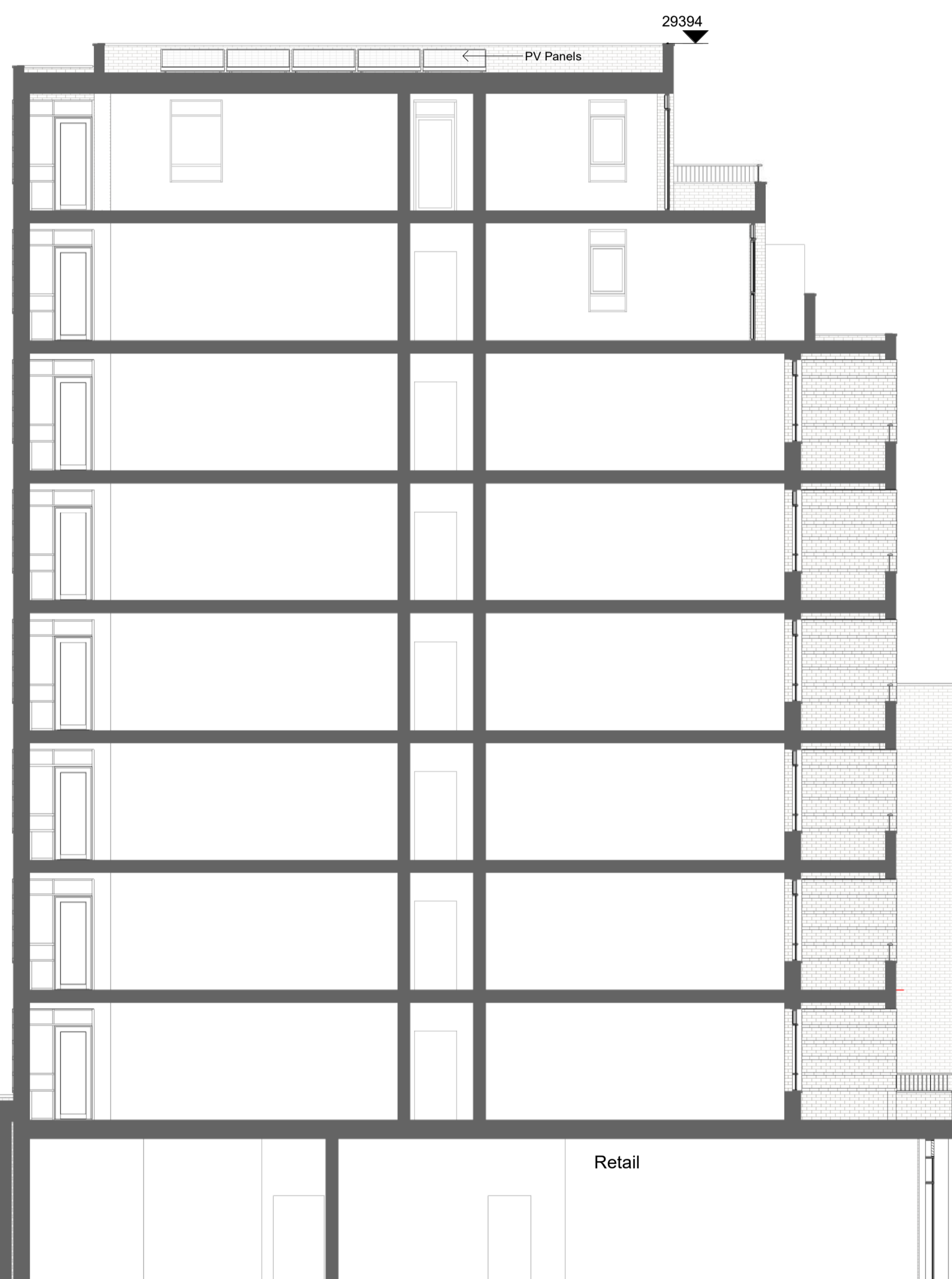
Level 4
FFL 13.135

Level 3
FFL 10.060

Level 2
FFL 6.985

Level 1
FFL 3.910

Level 0
FFL 0.000



Railway Line

New Station
Entrance

Retail

Rothesay Avenue

Rev:PL6	Date:27.03.2023	Drw:CB	Chk:AW
Reissued following fire consultant and design officer comments.			
Rev:PL5	Date:02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL4	Date:23.01.2023	Drw:CB	Chk:AW
Revised Proposal			
Rev:PL3	Date:28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL2	Date:19.01.2022	Drw:VM	Chk:SR
Issued for Planning			
Rev:PL1	Date:03.12.2021	Drw:VM	Chk:SR
Initial Issue			

Do not scale off this drawing
Report all errors and omissions to the Architect
Dimensions to be checked on site
Plot date: 27/03/2023 17:51:50

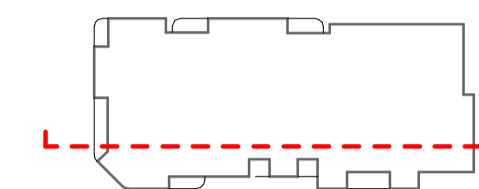
Client:
Wimbledon Square Development
Limited

Project:
Wimbledon Chase Station

Title:
Cross GA Section

Drawing status:
Planning





Level 9 (Roof)
FFL 28.710

Level 8
FFL 25.435

Level 7
FFL 22.360

Level 6
FFL 19.285

Level 5
FFL 16.210

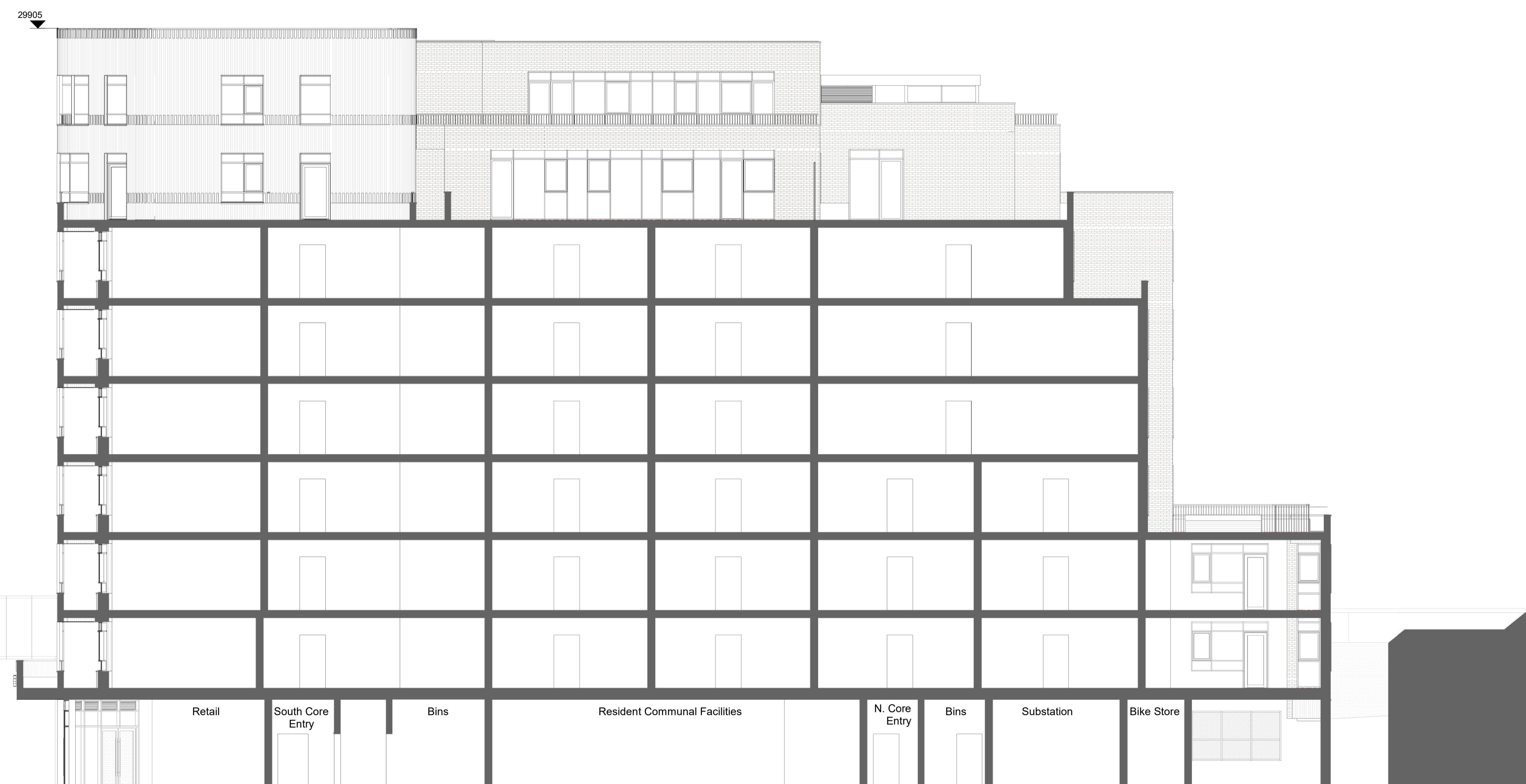
Level 4
FFL 13.135

Level 3
FFL 10.060

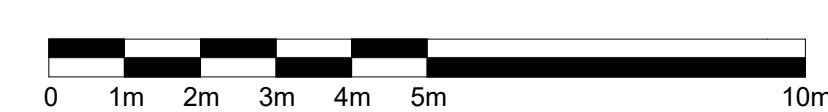
Level 2
FFL 6.985

Level 1
FFL 3.910

Level 0
FFL 0.000



KINGSTON ROAD



Rev:PL6	Date:27.03.2023	Drw:CB	Chk:AW
Reissued following fire consultant and design officer comments.			
Rev:PL5	Date:02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL4	Date:23.01.2023	Drw:CB	Chk:AW
Revised Proposal			
Rev:PL3	Date:28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL2	Date:19.01.2022	Drw:VM	Chk:SR
Issued for Planning			
Rev:PL1	Date:03.12.2021	Drw:VM	Chk:SR
Initial Issue			

Do not scale off this drawing
Report all errors and omissions to the Architect
Dimensions to be checked on site
Plot date: 27/03/2023 17:52:00

Client:
Wimbledon Square Development Limited

Project:
Wimbledon Chase Station

Title:
Longitudinal GA Section

Drawing status:
Planning

Material Key

1. Pale cream brick, vertical soldier courses, stretcher bond.
2. Warm buff/brown brick, stretcher bond.
3. Pale cream projecting soldier course brick detail.
4. Green-grey (RAL 7033) PPC-coated aluminium-faced windows.
5. Green-grey (RAL 7033) PPC-coated metalwork, copings and balustrades with hardwood timber handrail.
6. Dark green (RAL 6004) glazed pale cream ceramic signage with projecting lettering to match bricks.
7. Dark green (RAL 6004) back painted glass spandrel panels.
8. Grey-green (RAL 7033) louvred panels and doors to match windows.
9. Grey-green (RAL 7033) curtain walling.
10. GRC clad circular columns, pale cream colour to match brickwork.
11. Obscure glazed privacy screen.
12. Grey-green (RAL 7033) roller shutter to Network Rail service entrance.



Rev:PL7	Date:27.03.2023	Drw:RB	Chk:AW
Signage amended.			
Rev:PL6	Date:02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL5	Date:23.01.2023	Drw:CB	Chk:AW
Revised Proposal			
Rev:PL4	Date:28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL3	Date:19.01.2022	Drw:DO	Chk:SR
Issued For Planning			
Rev:PL2	Date:10.12.2021	Drw:VM	Chk:SR
New Station Entrance Gate Shown Indicatively			
Rev:PL1	Date:03.12.2021	Drw:VM	Chk:SR
Initial Issue			

Do not scale off this drawing
Report all errors and omissions to the Architect
Dimensions to be checked on site
Plot date: 28/03/2023 15:41:32

Client:
Wimbledon Square Development Limited

Project:
Wimbledon Chase Station

Title:
South GA Elevation - Kingston Road

Drawing status:
Planning

Material Key

1. Pale cream brick, vertical soldier courses, stretcher bond.
2. Warm buff/brown brick, stretcher bond.
3. Pale cream projecting soldier course brick detail.
4. Green-grey (RAL 7033) PPC-coated aluminium-faced windows.
5. Green-grey (RAL 7033) PPC-coated metalwork, copings and balustrades with hardwood timber handrail.
6. Dark green (RAL 6004) glazed pale cream ceramic signage with projecting lettering to match bricks.
7. Dark green (RAL 6004) back painted glass spandrel panels.
8. Grey-green (RAL 7033) louvred panels and doors to match windows.
9. Grey-green (RAL 7033) curtain walling.
10. GRC clad circular columns, pale cream colour to match brickwork.
11. Obscure glazed privacy screen.
12. Grey-green (RAL 7033) roller shutter to Network Rail service entrance.



Rev:PL6	Date:27.03.2023	Drw:CB	Chk:AW
Horizontal brick banding added. Fire consultants comments incorporated.			
Rev:PL5	Date:02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL4	Date:23.01.2023	Drw:CB	Chk:AW
Revised Proposal			
Rev:PL3	Date:28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL2	Date:19.01.2022	Drw:DO	Chk:SR
Issued For Planning			
Rev:PL1	Date:03.12.2021	Drw:VM	Chk:SR
Initial Issue			

Do not scale off this drawing
Report all errors and omissions to the Architect
Dimensions to be checked on site
Plot date: 28/03/2023 15:41:49

Client:
Wimbledon Square Development Limited

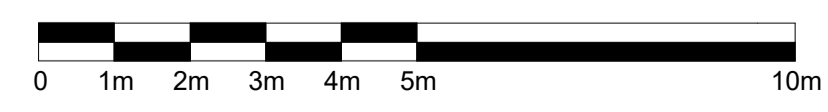
Project:
Wimbledon Chase Station

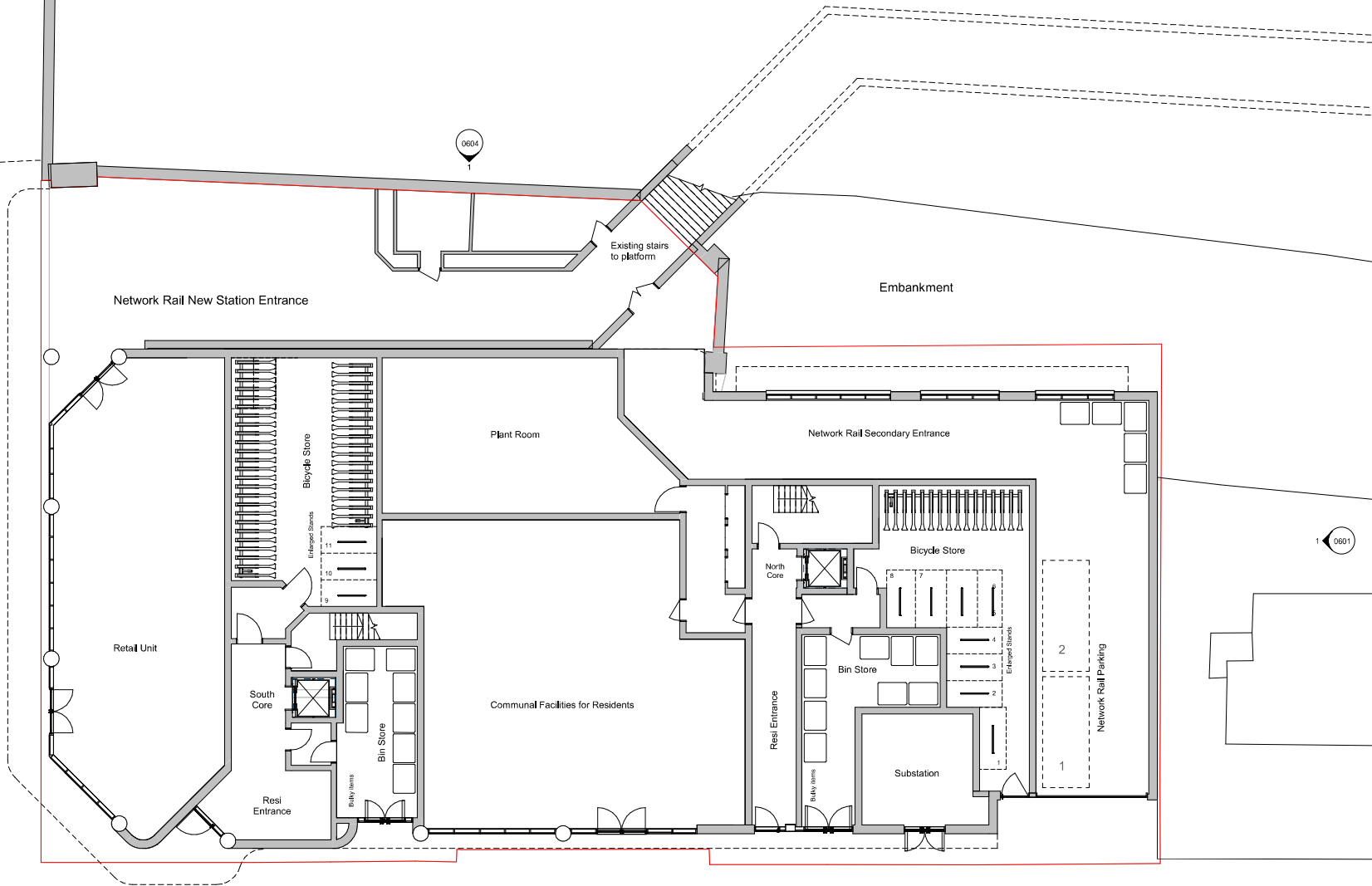
Title:
West GA Elevation - Station Side

Drawing status:
Planning



Scale @ A1
1 : 100
Drawing No:
2179-10-DR- 0604
Rev:
PL6





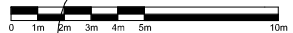
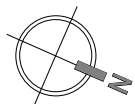
Rev:PL6	Date: 27.03.2023	Drw:CB	Chk:AW
Dividing wall removed from South Core lift lobby. Fire consultants comments incorporated.			
Rev:PL5	Date: 02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL7	Date: 23.01.2022	Drw:CB	Chk:AW
Layout Updated			
Rev:PL6	Date: 29.09.2022	Drw:PM	Chk:SR
Enlarged Cycle stands added			
Rev:PL5	Date: 28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL4	Date: 26.01.2022	Drw:PM	Chk:SR
Fire Consultants comments incorporated.			
Rev:PL3	Date: 18.01.2021	Drw:VM	Chk:SR
Issued for Planning			
Rev:PL2	Date: 10.12.2021	Drw:VM	Chk:SR
New Station entrance Indicative Layout added.			
Rev:PL1	Date: 03.12.2021	Drw:VM	Chk:SR
Initial Issue			

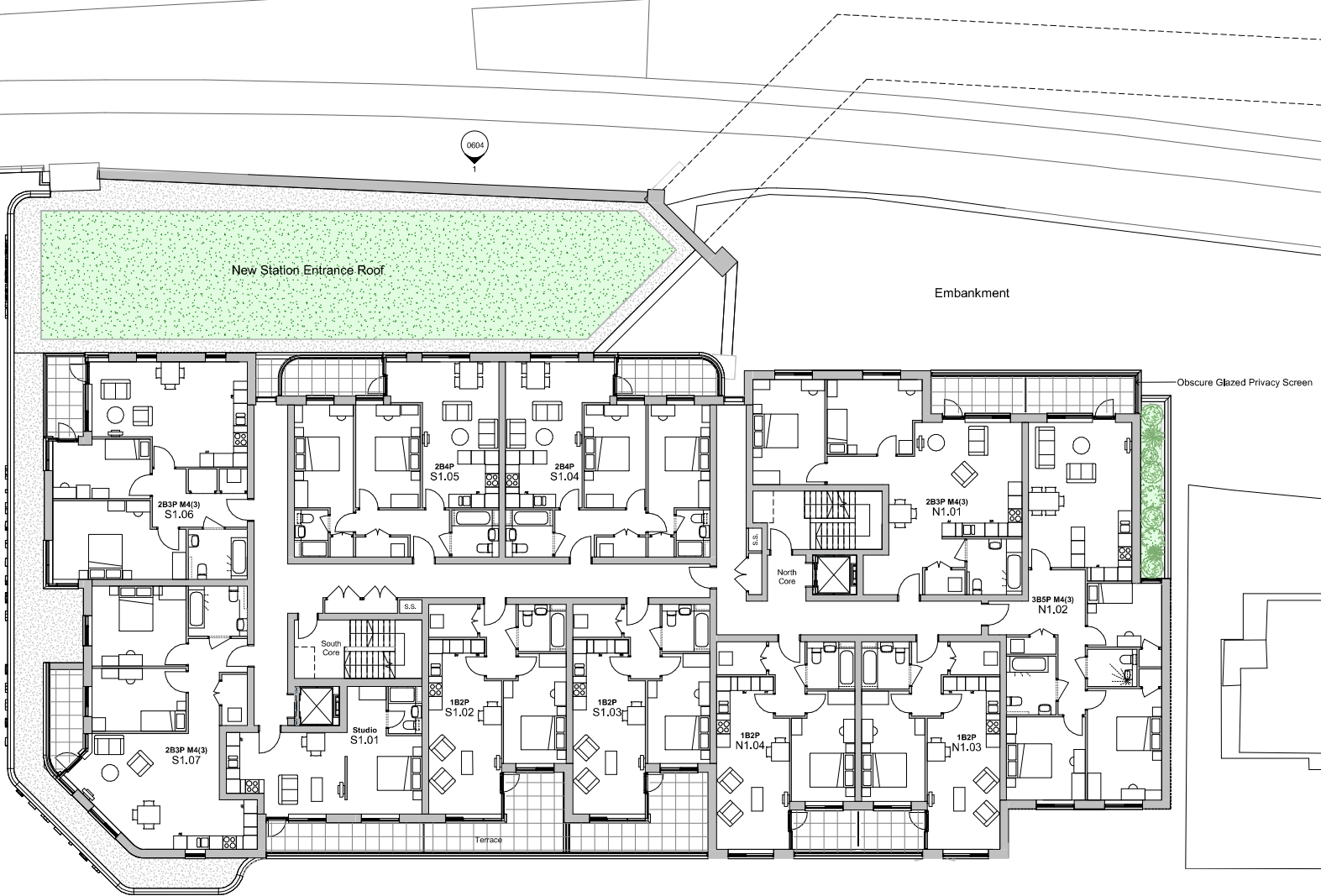
Client:
 Wimbleton Square Development Limited

Project:
 Wimbleton Chase Station

Title:
 Ground Floor GA Plan

Drawing status:
 Planning





Rev:PL9	Date: 27.03.2023	Drw:CB	Chk:AW
Fire consultants comments incorporated.			
Rev:PL8	Date: 02.02.23	Drw:CB	Chk:AW
Resubmitted for consultation			
Rev:PL7	Date: 23-01-2023	Drw:CB	Chk:AW
Flat layouts added, openings added.			
Rev:PL6	Date: 11.01.2023	Drw:CB	Chk:AW
Revised Proposal			
Rev:PL5	Date: 11.11.2022	Drw:RB	Chk:SR
Revised Proposal			
Rev:PL4	Date: 28.01.2022	Drw:VM	Chk:SR
CZWG Address Amended. Issued for Planning.			
Rev:PL3	Date: 26.01.2022	Drw:FM	Chk:SR
Fire Consultants comments incorporated.			
Rev:PL2	Date: 19.01.2022	Drw:VM	Chk:SR
Issued for Planning			
Rev:PL1	Date: 03.12.2021	Drw:VM	Chk:SR
Initial Issue:			
Do not scale off this drawing			
Report all errors and omissions to the Architect			
Dimensions to be checked on site			
Plot date: 28/03/2023 12:38:45			

Client:
 Wimbleton Square Development
 Limited

Project:
 Wimbleton Chase Station

Title:
 1st Floor GA Plan

Drawing status:
 Planning

Rev PL9	Date: 27.03.2023	Drw: CB	Chk: AW
Rev PL8	Date: 02.02.23	Drw: CB	Chk: AW
Resubmitted for consultation			
Rev PL7	Date: 29.01.2023	Drw: CB	Chk: AW
Rev PL6	Date: 11.01.2023	Drw: CB	Chk: AW
Revised Proposal			
Rev PL5	Date: 11.11.2022	Drw: RB	Chk: SR
Rev PL4	Date: 28.01.2022	Drw: VM	Chk: SR
CZWG Address Amended. Issued for Planning.			
Rev PL3	Date: 26.01.2022	Drw: PM	Chk: SR
Rev PL2	Date: 19.01.2022	Drw: VM	Chk: SR
Issued for Planning			
Rev PL1	Date: 03.12.2021	Drw: VM	Chk: SR

All dimensions are in metres
 Report all areas and volumes to the Architect
 Scale: 1:100
 Plot date: 28.03.2023 12:28:29

Client:
Wimbledon Square Development Limited

Project:
Wimbledon Chase Station

Title:
2nd Floor GA Plan

Drawing status:
Planning



Rev:PL1.0	Date: 27.03.2023	Drawn: CB	Checked: AW
Rev:PL.9	Date: 02.02.23	Drawn: CB	Checked: AW
Rev:PL.8	Date: 23.01.2023	Drawn: CB	Checked: AW
Fire layouts added, openings added.			
Rev:PL.7	Date: 11.01.2023	Drawn: CB	Checked: AW
Revised Proposal			
Rev:PL.6	Date: 11.11.2022	Drawn: RB	Checked: SR
Revised Proposal, 38.05.2022			
Rev:PL.5	Date: 30.05.2022	Drawn: PM	Checked: SR
Unit 4.108 balcony updated.			
Rev:PL.4	Date: 28.01.2022	Drawn: VM	Checked: SR
CZWG Address Amended. Issued for Planning.			
Rev:PL.3	Date: 26.01.2022	Drawn: PM	Checked: SR
Revised Proposal			
Rev:PL.2	Date: 19.01.2022	Drawn: VM	Checked: SR
Issued for Planning			
Rev:PL.1	Date: 03.12.2021	Drawn: VM	Checked: SR
Initial Issue of this drawing			
Do not scale off this drawing			
Report all errors and omissions to the Architect			
Plot date: 28.03.2023 12:29:50			

Client:
Wimbleton Square Development Limited

Project:
Wimbleton Chase Station

Title:
4th Floor GA Plan

Drawing status:
Planning

