

Agenda Item 6

PLANNING APPLICATIONS COMMITTEE
10th December 2020

<u>UPRN</u>	<u>APPLICATION NO.</u>	<u>Item No:</u> <u>DATE VALID</u>
	20/P1738	01/06/2020
Address/Site	196-200 The Broadway, Wimbledon, SW19 1RY	
Ward	Abbey	
Proposal:	<p>Demolition of buildings and a 2 phased redevelopment comprising a mixed use development with the erection of part basement, part single, part five, part 6, part 7, part 8 and part 9 storey buildings.</p> <p>Phase 1 comprising demolition of Olympic house and part of YMCA and erection of a 121 room homeless hostel (sui generis) with ancillary gym and café.</p> <p>Phase 2 comprising demolition of remainder of site and erection of 135 flats and 333sqm of flexible class A1 (excluding supermarkets) /A2/A3/B1(a)/D1 floor space with vehicle access from trinity road, ancillary car and cycle parking, landscaping and associated works.</p>	
Drawing Nos	200-Rev A, 201-Rev A, 202-Rev A, 203-Rev A, 204-Rev A, 205-Rev A, 206-Rev A, 207-Rev A, 208-Rev A, 209-Rev A, 210, 211-Rev A, 220-Rev A, 221-Rev A, 222-Rev A, 230-Rev A, 231-Rev A, 240a-Rev A, 240b-Rev A, 241-Rev A, 242-Rev A, 243-Rev A, 244-Rev A, 245-Rev A, - 246-Rev A, 247-Rev A, 248-Rev A, 249-Rev A, 250, 260-Rev A, 261-Rev A, 262-Rev A and 263-Rev A.	
Contact Officer:	Stuart Adams (0208 545 3147)	

RECOMMENDATION

Grant Planning Permission subject to any direction from the Mayor of London, conditions and completion of a S.106 legal agreement.

CHECKLIST INFORMATION.

Heads of agreement: Permit Free, Zero Carbon (TBA contribution), Car Club Membership, Implementation of loading Restrictions (TBA contribution), Travel Plan, Affordable Housing (zero percentage but early and late stage viability reviews required), hostel must remain for that use in perpetuity and Phases of development.

Is a screening opinion required: No

Is an Environmental Statement required: No

Has an Environmental Impact Assessment been submitted – No

Press notice – Yes

Site notice – Yes

Design Review Panel consulted – Yes (pre-application stage)

Number of neighbours consulted – 677

External consultations – Greater London Authority, Environment Agency, Secure By Design officer, Thames Water, Historic England (GLAAS), Historic England (Parks & Gardens) and Garden History Society.

PTAL score – 6b (Best)

Controlled Parking Zone (CPZ) – W3

1. INTRODUCTION

- 1.1 The application has been brought before the Planning Applications Committee for consideration in light of the number and nature of objections received.
- 1.2 The scheme is referable to the GLA under the Mayor of London Order (2008), Part 1 (Large Scale Development), Category 1B (Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings) -
 - (c) outside Central London and with a total floorspace of more than 15,000 square metres.
- 1.3 The GLA referral process gives the Mayor six weeks to provide comments on the application, assessing whether it complies with the London Plan policies. This is a consultation response known as stage one. The application is then considered by the local planning authority at its planning committee, where it decides whether to grant or refuse permission. Following its consideration, the local planning authority is then required to refer the application to the Mayor for his final decision, known as a Stage 2 referral. The Mayor has 14 days to make a decision to allow

the local planning authority decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority.

2. **SITE AND SURROUNDINGS**

- 2.1 The application site (196-200 The Broadway) comprises a plot on the corner of The Broadway and Trinity Road. The site comprises a mix of buildings ranging in height from 2 to 8 storeys including plant equipment, with the prominent structures being the existing YMCA building (8 storeys), Olympic House (6 storeys) and Tower Lodge (3 storeys).
- 2.2 The site is currently occupied by a mix of uses. The existing YMCA facility is an occupied 111-bed hostel facility for the homeless (*Sui Generis*), whilst Olympic House is a purpose built 1970s office building lawfully in Class B1(a) use other than part of two floors which are leased to a D1 education provider. Tower Lodge is also used by the YMCA as ancillary office and meeting space associated with the main YMCA hostel building (*Sui Generis*).
- 2.3 The site has an existing car park to the rear providing approximately 50 parking spaces, accessed via a private entrance off Trinity Road to the east, in between the YMCA building and Tower Lodge.
- 2.4 The surrounding area is mixed in terms of both use and character. Typically, The Broadway is characterised by commercial uses including offices, retail, restaurants and hotels, often with residential to the upper floors.
- 2.5 Trinity Road and South Park Road are principally residential in character, comprising a mix of detached and semi-detached 2 and 3 storey houses along with some blocks of apartments on Trinity Road reaching up to 5 storeys.
- 2.6 In terms of height, buildings achieve up to 10 storeys along this part of The Broadway, namely the Premier Inn hotel located opposite to the west. To the immediate west of the application site lies 188-194 The Broadway comprising a 2-storey commercial unit and one half of a pair of semi-detached properties. A planning appeal was recently allowed at this site for the demolition of the existing building and erection of a 7 storey office building.
- 2.7 The site benefits from a Public Transport Accessibility Level (PTAL) of 6 (a & b), on a scale ranging from 0 to 6b, where 6b represents the highest level of access to public transport facilities. This is reflective of the excellent local rail, tube and bus services which serve the site.

- 2.8 The site has access to a number of high frequency bus services, from close to the site on The Broadway, as well as adjacent to Trinity Church, and on Sir Cyril Black Way, all within a seven-minute walk from the site. The site is also within a short walk to Wimbledon Station providing access to National Rail and the London Underground, and South Wimbledon Underground Station south-east of the site.
- 2.9 The site is located within Wimbledon Major Town Centre and within the Future Wimbledon Masterplan Area.
- 2.10 The site is allocated within the adopted Merton's Sites and Policies Plan (2014) as Site Allocation 62, being for a suitable mix of retail (A1 Use Class), financial and professional services (A2 Use Class), restaurants and cafes (A3 Use Class), drinking establishments (A4 Use Class), offices (B1a Use Class), community (D1 Use Class), leisure/sporting uses (D2 Use Class), hostel (Sui Generis Use Class) and residential (including hotel, C3 and C1 Use Class).
- 2.11 The site is also allocated within Merton's Draft New Local Plan under site 'Wi15'. The allocation continues to identify the site as being suitable for a mixed-use redevelopment comprising the same mix of commercial, retail and residential uses.
- 2.12 The site is not located within a Conservation Area and does not contain any listed buildings or structures. The closest Conservation Areas are the South Park Gardens Conservation Area which is located approximately 140m to the north, and the Pelham Road Conservation Area which is located approximately 160m to the south.

3. **PROPOSAL**

- 3.1 Demolition of buildings and a 2 phased redevelopment comprising a mixed use development with the erection of part basement, part single, part five, part 6, part 7, part 8 and part 9 storey buildings. Phase 1 comprising demolition of Olympic house and part of YMCA and erection of a 121 room homeless hostel (sui generis) with ancillary gym and café. Phase 2 comprising demolition of remainder of site and erection of 135 flats and 333sqm of flexible Class A1 (excluding supermarkets) /A2/A3/B1(a)/D1 floor space with vehicle access from trinity road, ancillary car and cycle parking, landscaping and associated works.
- 3.2 The proposed redevelopment of the site in two phases will allow the YMCA to continue to operate throughout the build process and phase 2 will ensure that the homeless hostel can be viably delivered. This means the existing YMCA use is not ceased at any point during the construction works.

- 3.3 Phase 1 comprises the demolition of Olympic house and part of YMCA and erection of a 121 room homeless hostel (sui generis) with ancillary gym and café.
- 3.4 Phase 2 comprises demolition of remainder of site and erection of 135 flats and 333sqm of flexible Class A1 (excluding supermarkets) /A2/A3/B1(a)/D1 floor space with vehicle access from trinity road, ancillary car and cycle parking, landscaping and associated works.
- 3.5 The proposed building has been split into three different building blocks, 1 (YMCA), 2 Residential – in the centre) and 3 (Residential – corner element on The Broadway and along Trinity Road). The building is further subdivided into Blocks. The YMCA, Block A (central), B (corner) and C, D and E which included the staggered lowering of building heights on Trinity Road.
- 3.6 The YMCA facility will provide a range of ancillary uses including re-provision of the existing gym and café, which will also both be available for public use. Its re-provision within Phase 1 will also ensure that there is minimal disruption to the existing facility. The café will provide a wider benefit to the local community too and will be directly accessed from the piazza to the front of the site.
- 3.7 The scheme will deliver 135 residential units in the second phase. The proposed housing mix comprises 1 x studio unit, 108 x 1-bed units, 25 x 2-bed units and 1 x 3-bed unit. At ground floor of the residential building will be two commercial units and it is proposed their use is a flexible A1/A2/A3/B1/D1 use. Following pre-application discussions with LB Merton highways officers, it was agreed that this use will exclude a supermarket due to potential conflicts with servicing and deliveries.
- 3.8 The scheme proposes a mix of public and private amenity spaces and courtyards for benefit of future residents and the wider public. To the front of the site, a public piazza is proposed with direct pedestrian access from The Broadway. The proposed double height colonnade on both The Broadway and partly on Trinity Road will push the ground and first floor level of the proposed building between 1.4m and 3.9m (approx) into the site, creating an enlarged width public footpath.
- 3.9 Communal amenity space for the residents of the scheme will be provided to the upper floors, whilst internal courtyard spaces are an additional benefit for the YMCA at first floor and residents of the eastern block at third floor.

- 3.10 Cycle parking is provided at first floor level of the residential part of the scheme for future residents via two dedicated lifts. YMCA staff cycle parking is provided within the YMCA element at ground floor. Short-stay visitor cycle parking is provided within the public realm at the front of the site.
- 3.11 The scheme is car-free other than four disabled parking bays for the residential element of the scheme, which are located within the rear courtyard to be accessed via Trinity Road. This courtyard also brings servicing and deliveries into the site.

Amendments

- 3.12 Several minor changes have been made to the plans and elevations as a result of comments received during the statutory consultation period. These are discussed in turn below:

Reduction in size of bedrooms in some units

- 3.13 Following comments raised by Officers in respect of the bedroom sizes in the 1b1p units, the size of these bedrooms has been reduced. Officers noted that in some instances the bedrooms exceeded 11.4 sqm which meant that they would be large enough to accommodate a double bed in line with adopted standards. In these relevant instances, the size of these bedrooms has been reduced to 11.4 sqm or below to provide comfort that they are genuinely 1b1p units.

Ground floor duplexes

- 3.14 Comments were received from the Council's Urban Design Officer that there were unresolved issues within the front gardens of the duplex units along Trinity Road. To accommodate these concerns, the applicants have reconfigured the front gardens and bin stores to provide a more functional front garden, whilst the boundary treatment has been reduced from 1.5m to 1.2m to provide a more active frontage and more natural surveillance of the street.

Door added to commercial unit

- 3.15 A new side door has been added to the central commercial unit directly from the servicing corridor providing a more direct route for the future commercial operator and avoid goods passing through the public open space.

Amendments to the enlarged cycle parking spaces

- 3.16 Comments were received from the Met Police Officer and the GLA that the enlarged cycle parking spaces should be within a secured and lockable store. This has been incorporated at ground floor and would be controlled by fob access.

Relocation of short stay cycle parking

- 3.17 The original plans showed short stay cycle parking along Trinity Road. These spaces have been relocated to the central piazza following discussions with the Met Police Officer and will now benefit from more direct natural surveillance.

Clarification over fenestration in upper floors of YMCA

- 3.18 The GLA queried the YMCA bedrooms that potentially suffer from overlooking across the internal courtyard to the upper floors. The plans have been updated to show in greater detail the approach to the fenestration to avoid the direct overlooking. Alternate, perforated panels will be installed to the inward facing windows to ensure there will be no direct overlooking between opposing units.

Link from service yard to residential concierge lobby

- 3.19 The ground floor has been reconfigured slightly to provide a more direct link from the service yard to the residential concierge lobby which will provide a better user experience.

Zone around the 1b2p central block units

- 3.20 At the request of the Urban Design Officer, the scheme includes a 750mm zone around the beds in the 1b2p central block units to assist with circulation.

Aligning screen with vertical mullions

- 3.21 The balcony screens have been aligned with the vertical mullions in the central block façade facing the Broadway.

4. **PLANNING HISTORY**

200 The Broadway (YMCA)

- 4.1 19/P1271 - Telecoms licence notification in respect of the replacement of 3 x antennas and ancillary equipment – No further action - 16/04/2019

- 4.2 18/P3313 - Licence notification in respect of the replacement of 6 x antennas plus installation of new antennas comprising 1 x gps and 3 x rrus plus ancillary equipment – No further action - 17/10/2018
- 4.3 17/P0024 - Telecoms licence notification in respect of the replacement of 6 x antennas – No further action - 25/01/2017
- 4.4 14/P2972 - Licence notification in respect of the removal of 3 x existing antennas to be replaced with 3 x new antennas on the existing 5 high tower on the roof of the YMCA building – No further action - 22/06/2015
- 4.5 13/P0892 - Licence notification in respect of the upgrading of the existing telecommunications equipment that form part of the Vodafone mobile phone network with the replacement of the existing rooftop antennas – No further action - 04/04/2014
- 4.6 12/P2100 - Licence notification in respect of the installation of a 0.3 metre microwave dish at 26 metres on the existing rooftop poles – No further action - 18/07/2014
- 4.7 05/P0887 - Installation of new illuminated and non illuminated advertisements on building and in rear car park – Grant - 11/08/2005
- 4.8 99/P0236 - Installation of microwave antenna and equipment cabin on roof of building – Not required - 10/02/1999
- 4.9 98/P0442 - Replacement of three dual polar antennae on existing rooftop tower with three dual band dual power antennae – Not required - 29/04/1998
- 4.10 95/P0550 - Installation of 6 unidirectional telecommunication aerials and associated equipment upon roof of eight storey tower – Granted - 03/07/1995
- 4.11 94/P0764 - Erection of roof level extensions above first floor level to provide ancillary office and hostel accommodation and enclosed fire escape facilities to first and second floor levels – Grant - 25/05/1995.
- 4.12 90/P0153 - Installation of internally illuminated fascia sign beneath projecting canopy of building – Grant - 22/05/1990
- 4.13 MER406/83 - Retrospective application for the erection of an open topped brick built dustbin enclosure – Grant - 21/07/1983
- 4.14 MER517/73 - Change of use of previously approved ground floor shop units to offices – Grant - 15/06/1973

- 4.15 MER144/73 - Illuminated lettering to read ymca – Grant - 29/03/1973
- 4.16 MER73/72 - Display of 7 non illuminated advertisement panels for the duration of building operations or one year – Grant - 14/03/1972
- 4.17 MER659/71 - Erection of a building to provide shops, offices and YMCA hostel containing 100 bedrooms and ancillary accommodation for YMCA use – Grant - 07/10/1971
- 4.18 MER600/71 - Use for 3 months for storage and workshop – Grant - 10/08/1971
- 4.19 MER977/71 - Erection of building to provide shops, offices and YMCA hostel containing 100 bedroom and ancillary accommodation for YMCA use – Grant - 16/03/1972
- 4.20 MER70/69 - Illuminated box sign – Grant - 13/02/1969.
- Olympic House - 196 The Broadway
- 4.21 06/P2685 - Alterations to and re-cladding of existing six storey building including erection of one additional floor. Change of use from (class d1) to (class b1) to the first and second floor and erection of a six storey front extension – Grant - 11/06/2007
- 4.22 MER517/73 - Change of use of previously approved ground floor shop units to offices – Grant - 15/06/1973
- 4.23 MER73/72 - Display of 7 non illuminated advertisement panels for the duration of building operations or one year – Grant - 14/03/1972.
- 4.24 MER977/71 - Erection of building to provide shops, offices and YMCA hostel containing 100 bedroom and ancillary accommodation for YMCA use – Grant - 16/03/1972
- 4.25 MER659/71 - Erection of a building to provide shops, offices and YMCA hostel containing 100 bedrooms and ancillary accommodation for YMCA use – Grant - 07/10/1971
- 4.26 MER8/71 - Erection of building to provide shops offices and YMCA hostel containing 100 bedrooms, and ancillary accommodation for YMCA use – Deferred - 14/01/1971
- 4.27 WIM5981 - Outline erection of a 4 storey building including 2 shops, entrance lounge, dining room, kitchen etc and a total of 102 hostel

bedrooms and 2 three room flat on the 1st, 2nd and 3rd floors – Grant - 05/11/1961

4.28 WIM262 - Use of forecourt for the sale of flowers (determination under section 17) – permission not required - 07/03/1949

4.29 WIM248 - Erection of additional hostel accommodation – Grant - 11/02/1949.

196 The Broadway - 1st & 2nd Floors

4.30 03/P0079 - Change of use of first and second floors from offices (Class B1) to educational use (Class D1) – Grant - 07/03/2003

Permission reference 03/P0079 secured the change of use of the first and second floors of Olympic House from B1 to D1 to allow an educational use on the site. Whilst planning permission was secured latterly in 2006 and 2007 for a reversion to Class B1, along with a six storey front extension in 2007, these applications (06/P1921 and 06/P2685) were never implemented. Accordingly, the lawful planning use of Olympic House is Class B1 other than the first and second floors which is D1

4.31 06/P1921 - Change of use of first and second floors from educational use (class D1) to offices (class B1) (reversion to former use) – Grant - 04/10/2006

Corner Plot – formerly 222 – 224 The Broadway

4.32 07/P0055 - Redevelopment of the site. Erection of a building ranging in height from 3 – 6 storeys to provide 14 x 2-bedroom flats, Use (Class C3) financial / professional services (Class A2) and offices (Class B1). – Grant - 26/08/2010

Permission reference 07/P0055 secured the redevelopment of the corner plot adjacent to the YMCA to the immediate east for a 6 storey mixed-use scheme. This followed several similar applications on this parcel of land however none were implemented, and the permissions have now lapsed.

4.33 03/P2846 - Redevelopment of the site. Erection of a building ranging in height from 3 – 5 storeys to provide 14 x 2-bedroom flats with balconies and roof terraces, a food a drink use (Class A3) and offices (Class B1) with parking for four cars at the rear off Trinity Road – Grant - 06/10/2006

- 4.34 99/P1636 - Erection of a building ranging in height from 3 – 5 storeys to provide 12 x 2-bedroom flats and 2 x 1-bedroom flats. A retail or food and drink use (Class A1/A3) at basement and ground floor levels, a communal roof garden at the rear at third floor level and 4 off-street car parking spaces off Trinity Road, involving demolition of existing buildings on the site – Grant - 25/07/2002
- 4.35 92/P0823 - Erection of new storage room on Trinity Road frontage of property involving increasing height of part of boundary wall by 600mm together with insertion of new window to first floor office – Grant - 30/12/1992

Other relevant planning history

188 – 194 The Broadway, Wimbledon

- 4.36 20/P2166 - Demolition of existing building and erection of seven storey office building – Pending decision
- 4.37 18/P2918 – ‘Demolition of existing building and erection of six storey office building’. Appeal Allowed 23/01/2020. This application secured planning permission for a six storey building with plant equipment equivalent to a further storey above.

153-161 The Broadway, Wimbledon

- 4.38 16/P1149 – ‘Demolition of the existing buildings and erection of a 9 storey 176-bedroom hotel (Use Class C1) and ground floor restaurant (Use Class A3) facility and car parking and associated landscaping and access. Granted 10/11/2016.

5. **CONSULTATION**

- 5.1 The application has been advertised by major site notice procedure and letters of notification sent to the occupiers of immediate neighbouring properties and to wider neighbouring properties in the locality.

- 5.1.1 In response to the consultation, 107 letters of objection (including one from the Wimbledon Society), 101 letters of support and 36 letters of comment (including one from Right of Light Consultant and Swift Conservation) received.

5.1.2 **Letters of Objection**

The individual letters of objection raise the following points:

Safety

- History of anti-social behavior (ASB) on surrounding residential properties from the existing YMCA facility
- Neighbours need some comfort that the safety and wellbeing of their homes is protected.
- Nothing in the application documentation to show how the population of the hostel will be managed in terms of security for both local residents and residents at the YMCA. We were assured at the consultation there would be provision for 24 hour security at the premises and CCTV to monitor the open space and ensure it is safe at all times and this should be a planning condition for any final development proposal for the site.
- There is likely to be an increase in ASB from the YMCA with the additional rooms proposed.
- Management of the open space - The open space needs to have high visibility from the public highway, or it will encourage night time street drinking, drug taking and loitering. Ancillary to this will be the use of any screening such as plant boxes as toilets, hidden from public view.
- Will inevitably devalue the properties in the immediate vicinity.
- To prevent further illegal activity, gates and entrances should be locked/secured in the evenings and the YMCA should provide 24 hour security with a telephone/email contact for local residents.. This will also apply to any public areas

Noise, Dust & Pollution

- The proposed 2.4m high hoarding will not be sufficient and needs to be raised to a higher level to prevent impact on pedestrians and residential properties.
- Negative impact to the environment in this area, which has been already affected due to be located so close to restaurants, pubs, leisure centre, shops, schools and bus and train stations. This used to be a residential area which is no longer the case, with a substantial amount of traffic.
- Neighbours have already endured the works of the Polka Theatre which has included working on Saturdays and Sundays affecting the resting and relaxing time of the neighbours.
- Restricting lorries & skips to main roads & restricting building hours.

Design

- Height and massing too excessive and out of keeping
- Loss of light and overshadowing
- Overlooking

- Overdevelopment
- Adverse impact on the South Park Gardens Conservation Area
- The building should be set back further and have a steeper "stepping-down" shape to the North.
- No adequate bin and cycle storage
- Restrictions on bikes/junk being placed on balconies. There should be a planning condition that the Management Company enforce restrictions. There should be a large internal storage area for bikes and large prams to avoid clutter on balconies
- The high density of the proposed development.
- Lack of gardens.
- The height of this building will set a precedent
- The total volume of the proposed buildings is alarming and inappropriate for a development on the outer edge of the recognised business district of Wimbledon town centre.
- Too many single aspect flats.
- The height of the proposed building is 7m or 2 storeys higher than the existing building over a much greater footprint and the mass and bulk will be overbearing to the Victorian residential properties in South Park Road.
- To avoid a repeat of the existing YMCA building (only built in the 60s but already looks derelict) it is essential that long lasting, good quality materials are used. No cladding. It should be brick, stone, concrete and glass. This will ensure the building looks "new" for decades.
- The overhang (from second floor up) and height puts the proposed development closer to roads and will make both The Broadway and especially Trinity Road feel narrower.
- The development along the Trinity Road side is much higher, bigger and closer to the road than before - no other buildings on the road are as substantial or built so near the boundary/pavement/road.
- The proposed bulk/mass of the development and the lack of green space within it is not in line with the character of the conservation area.

Landscaping

- The contemplated green space and trees outside don't seem to have gotten much attention to ensure they will be successfully planted and able to grow in close proximity of the building's significant pipe works and drainage. The green space deserves a significant review and upgrade, and the viability of the trees ought to be formally, and independently, confirmed.

- Trees included in this development should be drought resistant and watered regularly.

Housing Mix

- Provision of new housing is always welcome, but it is surprising to see the high density of 1 bedroom flats for the proposed development. Wimbledon /South Wimbledon is an area with a well-balanced mix of several generations, and the proposal to develop such a high number of one bedroom flats does not reflect the diversity or needs of the local population.
- It's more likely that those flats will be bought by investors and rented out which will mean a high turn over of residents and a less cohesive community. A more transient population will result in a less cohesive community as the residents' will not have long term plans or interest in the local area resulting in little or no social and financial investment in the area.
- While the proposal is for the development an A3 commercial units on the ground, I would ask for measures to be put in place (such covenants agreement attached to the title deed) to ensure that no A4 units can be set up (pubs, bars etc). This is probably due to the nature of the likely tenants of the hostel.
- The developer has focused on the backlog need in The Mayor of London's 2017 London Strategic Housing Impact Assessment (LSHIA) to justify the density of one-bedroom flats in the design proposal but this cannot be used to reflect development balance for a single scheme of this type as it fails to address the overall impact on the surrounding community.
- According to the LSHIA, projected housing tenure needs (net annualised requirement) over the short term overall (2016 - 2045) showed a need for 55% of new housing to comprise 2, 3 and 4 bedroom accommodation across market rented, intermediate and low cost rent sectors while long term projections for the same types of accommodation overall at just over 45%. 80% of 1 bedroom flats proposed brings no benefits to the local area.
- Risk that the units will be turned into Airbnb lets.
- The high number of 1 bedroom flats unfairly prejudices the younger generation who would like to stay in the area but are unable to find a flat suitable for their needs when they wish to start a family as 2/3/4 bedroom flats of reasonable sizes and quality are few and far between in Wimbledon.
- Given the ethos of the YMCA in supporting local communities, this aspect of the design is both surprising and disappointing.
- The design proposal for residential flats suggest the proposal is geared to generate maximum profit and value at the expense of longer term social cohesion.

- The drawings indicate a large number of minuscule residential flats to be squeezed at the detriment of the living quality of future residents.

Highway/Transport

- The number of one bedroom flats will flood the area with an increase in population numbers increasing pressure on an already busy public transport system.
- Noted all traffic will approach via The Broadway and Merton Road. There needs to be clear signage on these routes to ensure construction traffic will adhere to the traffic route and not take short cuts through residential areas south of The Broadway.
- The provision of 135 flats raises issue regarding the adequacy of parking. The lack of any parking, apart from a paltry 4 disabled bays, is of concern. CPZ W3 is already oversubscribed. Underground car park required.
- Vehicle access from Trinity Road would have a dangerous impact raising issues of highway safety. The Trinity Road, Broadway junction is currently a busy junction and a development of 135 flats would increase massively this busy and congested area of Trinity Road.
- The current road system would not support the need for parking, loading, turning, waste collection and the ubiquitous delivery vans.
- If the development of 135 flats is allowed to go ahead the area of Trinity Road from South Park Road to The Broadway would lead to the need for dangerous manoeuvres onto an increasingly busy and congested Trinity Road.
- There has been no proper consideration given to the logistics and traffic flow associated with the servicing of such a huge building, let alone relying on Trinity road that is relatively narrow, busy, and lined with parked cars and speed-reducing landscaping.
- The new building will be closer to the pavement edges than the existing building. This is likely to cause severe disruption and safety issues to the area, as well as road closures.
- The two commercial units don't appear to have proper access for goods, and the minimal parking space at the back of the building would not be suitable for this purpose.
- Steps need to be taken to prohibit the use of the nearby parking facilities.
- Trinity Road is a 20mph Road and is a direct fire engine route to service Hayden's road / Plough lane areas of the town from the Kingston Road fire station and needs to be kept as clear as possible.
- A safe construction entrance should be provided to avoid congestion on both the Broadway and Trinity Road

- Use of residential roads for skips and trucks should be banned (or rather the ban which is already in place should be enforced).
- Inappropriate cycle storage. The two tiered cycle parking layout does not conform to the London Cycling Design Standards. Both in terms of the dimensions of the actual aisle width, and in terms of not following the guidance for two-sided double stacking on the same aisle. The aisle should be wider than for one-sided double stacking. The widths proposed will make this cycle parking very awkward and at peak times unworkable.
- Providing two lifts accommodates the frequent coming and going from a 188 bike store. It must be assumed that several bikes could be waiting to use the 2 lifts and the lift lobbies do not allow for this when bikes are also existing the lifts. The ground floor and first floor bicycle lift lobbies are too tight and this is exacerbated by the access ways to them.

Neighbour Amenity

- Residents don't want to look out of their windows or down the road to see such high towers blocking the sky, the light, the view and overlooking their gardens.
- Loss of privacy and overlooking
- Disruption during construction
- The building should be set back to the current building line of Olympic House.
- A larger / wider open space will encourage night time street drinking, drug taking and loitering.
- The proposal is clearly overbearing, with a larger bulk and mass than the neighbouring buildings. Its scale and bulk are not appropriate to the streetscene.
- The hours of construction should be limited to 8 am to 5 pm Monday to Friday. Residents need a break from the constant noise and pollution.
- Windows of the hostel rooms directly facing our block exposing our homes directly to residents of the hostel rooms. We would ask that the design of the windows to the hostel either be changed so it faces away from residential properties to The Broadway or some tinting of the windows be considered to obscure and reduce visual incursion into flats opposite so they do not have a clear view into flats opposite.
- Loss of light and overshadowing

Daylight/Sunlight Report commissioned by third parties:

The report assesses impact on Oadtrin Lodge (5 Trinity Road) on pages 15 and 16. It finds that there are 28 VSC daylight shortfalls to windows to

this property, 15 NSC/DD shortfalls and 11 ASPH shortfalls. This is clearly unacceptable and will result in significant adverse impact to the residents of Oadtrin Lodge.

As residents of Oadtrin Lodge, we have commissioned another Daylight & Sunlight Survey (July 2020, Model Environments). This finds that (Executive Summary): "The impact of this proposal upon Oadtrin Lodge, on the opposite side of Trinity Road, is classified as severe. Two versions of the proposal have been tested, neither of which complies with good practice, which suggests that impacts to natural light at Oadtrin Lodge have been overlooked unintentionally or otherwise."

The report assesses a total of nine windows at Oadtrin Lodge. It finds that the impact to daylight for all the windows tested breaches good practice and is therefore classified as severe. Sunlight reception is also adversely affected, to a degree likely to be noticeable by occupants,

The proposal will cast a shadow across the road and the entire Oadtrin Lodge / Nairn Court from midday. This will affect the amenity of neighbours and also the safety and security of pedestrians.

The report assesses impact on Viscount Point on pages 17 and 18. It finds that there are 30 VSC shortfalls to windows to this property, and 41 NSC/DD shortfalls. This is clearly unacceptable and will result in significant adverse impact to the residents of Viscount Point. There is a need for independent review of the applicant's Daylight & Sunlight Assessment.

Commercial Uses

- Needs to be a permanent covenant against the use of the premises for A4 uses (public houses, wine bars or other drinking establishments).
- The Broadway is well served by A1 retail spaces and would encourage use of the second commercial unit as affordable workspace for entrepreneurs and flexible use office spaces to attract tech companies should be encouraged.
- Given the number of new residents, it would perhaps have made sense to consider making one of these units some form of health or community facility.
- Concern with the viable layout (dividing doors) of the proposed YMCA studios. The folding doors are not a good choice for the studios; noise will travel very easily which will be really difficult when multiple classes are happening alongside the gym.
- A balcony on the back of the building is not a good idea; it is north facing and overlooks a car park,

- Concerns about natural light in the studio shared by children.
- Concern that the commercial units will remain empty.

Air Quality

- The residential blocks are also located at the corner of the site facing standing traffic at the lights which surely is detrimental for those living in the residential flats. Air pollution and noise levels would surely be higher with the presence of constant standstill traffic at the traffic lights leading to occupants suffering longer term exposure to air pollution and noise.

Other

- Proposed density will add significant stress to the underground sewage and water system.
- Lack of school & surgery places and no NHS practices within walking distance.
- Lack of green/climate change measures, like solar panels and green walls and maintenance of trees.
- The Planning Statement also implies that the hostel accommodation will comprise the affordable housing component. However, Policy CS8 of the Merton Core Strategy aims for a 40% provision of affordable housing. In our view, hostel accommodation is a separate use and as temporary accommodation does not conform with what is considered 'affordable housing'. Therefore, 40% of the proposed new flats should be affordable.
- There will need to be barriers for scaffolding, and a site access; it is likely that this will cut off at least one lane of the two that Trinity Road has now for the whole period of the works.
- Trinity Road is a very busy access for traffic and services to this whole area and needs to be kept fully open. It is one of only two traffic-light controlled access roads to the whole of the Broadway.
- The large construction, including a larger basement will inevitably have an effect on the local water table.
- After Covid 19 it is essential to create wider pavements to allow social distancing.
- Inadequate bin storage for 300 or more people plus 3 commercial units. Little information regarding refuse strategy. The bin store needs to be expanded by at least 50% that proposed and location for commercial waste disposal needs to be clearly defined in their plans which currently isn't shown.

Supporting comments within objections

- The prospect to redevelop the YMCA is a welcome news. I am also pleased that the council has listened to the objections and concerns raised by the residents and owners to its previous redevelopment proposals notably reducing the height and density.
- I am supportive of a redevelopment of the site, as the existing building is aged and an eye sore. If approved, the planning application would result in a new and relatively attractively designed building.
- This is a much more pleasant and reasonable project now and it looks like should the residents and the YMCA agree to some additional compromises, we might end up with very much needed improvement that will respect the current environment and the community.
- Materials seem to be of good quality and appealing to the eye

5.1.3 **Wimbledon Society**

This proposed development is for a 121 bedroom Hostel with its ancillary facilities, and for a Housing development of 135 flats, together with two commercial units/shops, and gym facilities at street level.

The site is within the designated town centre. The South Park Gardens Conservation Area and open space is to the north, from where the site is 'particularly visible' (LBM Local Plan page 320).

A c26m x c16m south-facing paved space is created beside the Broadway. The intention is to build a new hostel as a first phase, then demolish the present hostel, and utilise its site for housing.

HEIGHT AND BUILDING LINE: what is proposed is not considered acceptable.

The two existing tall buildings are 19m high to the eaves (22.5m to the setback storey), and 24m to the eaves (27.5m to the setback storey), the taller slab being 'end-on' to the Broadway. Today's frontage to The Broadway is set back some 4m. On the Trinity Road frontage the new flats opposite are set back some 5 - 6m from the highway.

The proposal is for a Broadway façade height of between c27.5m and c28.8m throughout, and a façade to Trinity Road that is mostly 28.8m, then stepping down.

A very significant increase in height compared to what now exists. The other three buildings at the corner of The Broadway and Trinity Road, are only some 16m high.

Additionally, the proposed upper floor facades are projected further forwards, so that they are aligned with the back edge of the public footway in places. This would unreasonably affect both the street scale, and the outlook from the three new blocks of flats around this intersection.

It is clear that the general public view on building height in the town centre, expressed at many meetings and Council-run workshops, is that no new building should exceed the coping height of the CIPD building, being some 22m.

Accordingly, the future development fronting the Broadway should not exceed a 22m coping height, compared with the 19m and 24m heights now existing. As the proposed building façade is projected much further forward, it is going to appear even more dominant in the street views. The new facades should therefore be set well back from the site edge.

The elevation facing Trinity Road is also far too dominant in the street scene, being too high and too far forward, and does not respect the natural building line. It dominates the new flats opposite. It should reflect the existing 5m building line and be significantly stepped down in height.

As an illustration, the daylight angle from the street centre line to the properties on the east of Trinity Road is around 50 degrees, whilst to the YMCA site is 75 degrees, a street scale that is more often seen in central London. 50 degrees should be seen as the maximum.

HOUSING DESIGN: Of the 135 proposed flats, 52 are designed as single aspect. This is considered to be totally unacceptable, and not the kind of housing that one should be relying on.

With no natural cross ventilation this approach would inevitably lead to the installation of mechanical air handling, a wasteful use of energy. With only a single outside façade, some flats will be highly susceptible to excesses of the climate, and their occupants will have no opportunity to move to another part of their flat to seek comfort. All new flats should be dual aspect.

The use of an 'internal' light well, to provide some dual aspect flats is noted. Being 6 storeys deep, mostly sunless, and only some 9m x 14m on plan, this could need a special design approach.

If the tree as shown is to be accommodated, one presumes that it would require substantial root depth to be provided, impacting on the storey below.

The use of maisonettes, with their front doors directly approached from

Trinity Road gives interest to the street and is welcomed.

FIRE: The Society is not able to technically assess the adequacy of the arrangements made for Fire Safety, but the reliance on single staircases as a means of escape, without alternatives, seems highly problematic for buildings of this height.

Whilst the Hostel block has two stair cores, safe emergency access along the long corridors also appears problematic. How would Brigade rescue to the individual rooms be possible externally?

ENERGY AND CLIMATE EMERGENCY: The project is said to achieve the BREEAM level of “very good”, but not the “outstanding” level. The current proposals utilise roof-mounted heat pumps (significant acoustic mitigation measures (7.2) should be provided) and 166 PV panels on the roof.

As a major new-build project, this development should clearly set its sights on meeting the ‘outstanding’ level. The proposed payment of only £57k of “amelioration funding” to the Council to compensate for the energy/sustainability shortfall should be seen as a missed opportunity.

CYCLE STORAGE: Provision for cycle storage is welcomed, but the access needs to be more user-friendly. Passing around to the back of the service yard, past the windows of flats, then through a corridor, then up a lift, before getting to the cycle store, is far from ideal.

Could not this be improved by simply eliminating the two ground floor flats (which have a poor outlook directly onto the service yard anyway), and locating the cycle store at ground level, beside the bins?

SOUTH-FACING SQUARE: This space is very much to be welcomed and bringing it to the front of the site (rather than being enclosed by building) is a welcome result of earlier public involvement in the design process. Its detailed design needs to facilitate creative use by local people and workers.

It would be important to ensure that this space is formally dedicated for public use rather than kept private. It could host exhibitions, market stalls and outdoor events, much as the ‘Piazza’ now does. There should be no access for vehicles.

As there is no basement beneath this outdoor space, there is the opportunity to see significant tree planting in what could be quality root space, free of underground services. The drawings also show tree planting in the public footway, and this should be progressed.

It has to be remembered that, as the midday mid-winter sun is only some 16 degrees above the horizon, most of the northern footway along The Broadway gets no sun for several winter months.

WATER: An attenuation tank to arrest flooding is said to be proposed but needs to be recorded on the drawings. The reported indication from Thames Water that there may be insufficient water supply and/or waste water resources needs to be resolved.

The design of this development has progressed following public involvement, but as shown above, some major issues need to be resolved before the scheme should be accepted.

5.1.4 **Letters of support**

The individual letters of support raise the following points:

- It will provide a better quality of accommodation for residents of YMCA Wimbledon.
- It will enable the YMCA to secure its future in Wimbledon and to provide improved facilities for its residents and the wider community.
- It will deliver high-quality new homes alongside the YMCA, to help meet Merton's housing need, in particular for 1-bedroom homes.
- It will provide commercial units at ground floor, which will activate the street frontage along The Broadway and provide high-quality space for businesses.
- It will offer a flexible, landscaped public open space at the front of the site, creating a safe and welcoming place for the community to enjoy.
- It will deliver a building of much higher architectural quality, worthy of being in this town centre location and a future asset to the borough.
- It offers attractive and sustainable design, including extra tree planting on site, green roofs and energy efficient measures.
- The developer has undertaken thorough consultation with the local community and has shaped the plans in response to feedback from residents.
- The second design is attractive and much better than the first in terms of materials, decoration etc. There has been a real effort to make the street area attractive with an arcade, café etc.
- The YMCA have played a fantastic role in helping the needy and I think the Council should support them by giving approval to their latest proposal.
- I think it's important to maintain the current purpose of the block in terms of housing homeless residents and am pleased to see that they'll be getting an upgrade in their facilities with better communal spaces

and ensuite rooms. In addition, I'm delighted to see that there are to be new, high-quality flats built, particularly one bedrooms which are generally in shortage in London.

5.1.5 Comments

The individual letters of comment raise the following points:

Swift Conservation

The Ecology By Design "*Preliminary Ecological Appraisal*" (August 2019) recommends hollow bricks for nesting birds (page 12), plus a green/brown roof and wildlife-friendly planting (pages 12-13), and we request that these are included in the planning conditions.

We welcome the inclusion of swift bricks in the public design on display during January 2020.

To achieve a net gain for biodiversity in accordance with the NPPF 2019, integrated swifts bricks have the advantage of lasting the lifetime of the building, as well as being zero maintenance, and aesthetically integrated with the building design.

Swifts bricks are specifically mentioned in the NPPG July 2019 guidance on the Natural Swift Conservation

Environment: "*Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments,*" (NPPG Natural Environment 2019, Paragraph: 023 Reference ID: 8-023-20190721 - <https://www.gov.uk/guidance/naturalenvironment>).

This development is close to areas where swifts (on the RSPB amber list due to rapidly declining numbers) are currently nesting, with swifts known to nest on nearby Alverstone Avenue SW19 (recorded on the RSPB swift survey database website).

Therefore we request that swifts bricks are installed near roof level. An ecologist in consultation with the architects could identify the best locations in the building, or this service can be provided free through Swift Conservation (mail@swift-conservation.org).

Right of Light Consultant

We are appointed by the residents noted below who own properties within South Park Road and Trinity Road. Our clients are concerned that the

proposed development at 196 to 200 The Broadway will impact upon the light receivable by their properties.

- Flat 2, 77 South Park Road,
- 75 South Park Road,
- 73 South Park Road,
- 71 South Park Road,
- 69 South Park Road,
- 63 South Park Road,
- 61 South Park Road,
- 59 South Park Road,
- 55 South Park Road,
- Flat 1, 32 South Park Road,
- Flat 3, 32 South Park Road,
- Flat 4, 32 South Park Road,
- 30 South Park Road,
- 26 South Park Road,
- Flat 19 Nairn Court 7 Trinity Road
- Flat 2 Nairn Court 7 Trinity Road

Our clients' properties are sited to the north and east of the proposal site. The proposal, to erect buildings, a mixture of part single, part five, part six, part 7, part 8 and part 9 storeys, will have an adverse impact upon the levels of daylight and sunlight currently enjoyed by our clients.

The Building Research Establishment (BRE) "Site Layout Planning for Daylight and Sunlight: a good practice guide" 2011 by PJ Littlefair provides guidance for the planning department to consider.

The introduction to the BRE guide at 1.1 suggests that "people expect good natural lighting in their homes and in a wide range of non-domestic buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by. Access to skylight or sunlight helps make a building energy efficient; effective daylighting will reduce the need for electric light, while winter solar gain can meet some of the heating requirements.

The BRE provides numerical guidance in order to avoid developments impacting upon neighbouring properties. We understand that the applicant has instructed Robinsons surveyors to undertake a daylight and sunlight study, the results of which indicate that the proposal causes extensive breaches of the BRE Guide for daylight and sunlight.

It is well recognised in practice that the reduction in light is defined as set out below. A reduction in light which falls within the moderate adverse or

major adverse heading is considered by surveyors as a significant reduction to the existing level of light.

Negligible No alteration or a small alteration from the existing scenario which is within the numerical levels suggested in the BRE Guidelines
Minor Adverse Marginal infringements (20.1-30%) of the numerical values suggested in the BRE Guidelines, which should be viewed in context
Moderate Adverse Moderate infringements (30.1-40%) of the numerical values suggested in the BRE Guidelines, which should be viewed in context
Major Adverse Major infringements (40%+) of the numerical values suggested within the BRE Guidelines, which should be viewed in context

From a review of the results produced by Robinsons Surveyors (Applicants Daylight/Sunlight Report), the losses of daylight and sunlight can be summarised to include those which result in a Moderate and Major Adverse Impact to residents' properties.

We also understand that the Robinsons' daylight and sunlight study has been prepared without a site visit to inspect the internal arrangements of our clients' properties, nor have plans for the buildings been obtained. You will therefore appreciate we are unable to confirm to our clients that the daylight and sunlight results are an accurate interpretation of the anticipated light loss. The BRE Guide at para 2.2.5 recommends that *"Both the total amount of skylight and its distribution within the building are important"*. A site visit to our clients' properties is therefore required in order to obtain the layout and measurements of the rooms in order to accurately determine the results.

In light of the above, we would request that no decision in favour of the application is made until the applicant instructs Robinson's surveyors to liaise with us to visit our clients' properties to obtain the internal layout and measurements, amends their computer model where necessary, re-runs the BRE daylight and sunlight tests and produces a proposal which satisfies the BRE recommendations. We would also request that a copy of the computer model and analysis be forwarded to us so that we can advise our clients accordingly on the accuracy of the results.

In addition to planning considerations, it is useful to assess the risk of any potential civil action from the outset and mitigate any future costs which could be incurred defending a claim.

Therefore, we strongly advocate that the issue is resolved during the planning stage – in particular, to avoid planning permission being granted for a development that may not be built due to legal rights of light restrictions.

In summary, we request that no decision is made in favour of the application until we are satisfied that the proposal complies with both the BRE guidelines and the civil legal rights of light criteria.

5.2 **Consultation responses and Councillor Comments/Objections**

5.2.1 Councillor Paul Kohler - Trinity Ward

I have been asked by my constituent to make the following points on behalf of him and his wife who lives on South Park Road and whose garden abuts the proposed development.

a) We remain alarmed by the overshadowing drawings that have now been made available. All the houses that are adjacent to the YMCA car-park will be very seriously affected (more than 3 hours expected loss of light in the morning in March).

b) The total volume of the proposed buildings exceeds the stated needs, and is inappropriate for an area which is at the border between commercial and residential areas (with the latter part being a Conservation Area).

c) The plan will bring tall buildings much closer to - and therefore will overshadow - houses and gardens than the current set up (see in particular the extension of where Olympic House is now).

d) The plan will include more commercial space, of which there is no need: see how Centre Court is becoming increasingly empty of successful commercial premises.

5.2.2 Cllr Stringer (Abbey Ward)

As councillors of the neighbouring Abbey ward, the YMCA proposal will have a substantial impact on our residents, and indeed on the whole of Wimbledon. Therefore we have stayed closely involved in reviewing the proposals and encouraging residents to share their feedback.

We welcome the current proposal. We believe that redevelopment of the site is crucial, firstly to ensure that the people housed by the charity in the hostel accommodation have an environment that supports them in their personal development towards independent living, and secondly because the current site is a local eyesore. This came through strongly in last year's consultation feedback on the Future Wimbledon Masterplan.

But we, and other residents, were nervous about one large unloved building being replaced with another. Thankfully, following substantial input from local residents, we believe that this proposal offers a development that will benefit the local community as a whole. We particularly appreciate:

- The height being in line with the current building and no higher
- The creation of new public space, which will encourage people to walk along the Broadway and benefit other local businesses.
- The aesthetics of the layout of the three blocks.
- The stepping down of the height (from 9 to 5 blocks) towards the more residential areas on Trinity Road.

We recognise that nearby residents may have some ongoing reservations, despite the changes made to address concerns about the impact of the density of the building.

However, overall, we believe that the proposal would be a positive development for the area, directly benefitting some of our most vulnerable residents by providing them higher quality accommodation, as well as the wider community through services such as the updated gym, commercial space (and we welcome the exclusion of a supermarket as a consideration for that space), and the public space.

5.3 Councils Tree Officer – No objection subject to conditions

5.4 Greater London Authority (GLA)

Strategic issues: - **See Appendix 1.0** for the GLA full response to Stage 1 referral.

Principle of development: The reprovision and uplift of the bed spaces within the homeless persons' hostel, and the optimisation of the site and contribution towards housing delivery, is supported in principle. Clarification is however required in respect of the reprovision of the existing social infrastructure facilities within this town centre location. There are no strategic concerns raised in respect of the loss of office land use from this site (paragraphs 18-29).

Affordable housing: The scheme is proposing 0% affordable housing. The residential element of the scheme is proposed to cross-subsidise the reprovision of new YMCA hostel and facilities. A financial viability appraisal is currently being scrutinised by GLA officers to establish the need for, and the nature of, the cross-subsidy proposed. Through the assessment of the viability information, any surplus should be used for additional bed spaces within the homeless persons hostel or for affordable

housing. The bed spaces within the homeless persons hostel must remain for that use in perpetuity; this must be secured within a Section 106 agreement. Early and late stage viability review mechanisms should be secured (paragraphs 31-35).

Design: The layout of the scheme seeks to optimise the site, and there are no strategic concerns raised in respect of height and massing of the proposals. The provision of new public realm and activation of the high street in this town centre location is supported. The play strategy should be reviewed (paragraphs 40-54).

Transport: Further information is required to demonstrate that the quantum of cycle parking is sufficient and is designed in accordance LCDS including at least 5% being Sheffield Stands, and that the development contributes towards Healthy Streets indicators, both within the site and the wider area. A travel plan, deliveries and servicing plan and construction logistics plan should be secured (paragraphs 76-85).

Strategic issues relating to equalities, fire safety, energy, air quality and urban greening need to be resolved.

Recommendation:

That Merton Council be advised that the application does not yet fully comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 89 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Post Stage 1 comments:

Loss of education floorspace:

Notwithstanding the information provided below in relation to the education space provided below, Policy S3 of the Mayor's Intend to Publish London Plan remains outstanding in terms of addressing the proposed loss in the context of ongoing or future need. Subject to the LPA's acceptance in respect of the loss of education floorspace associated with the proposals, and provision of confirmation that there is no identified local need for such infrastructure, the GLA has no further comment to make.

Play:

Evidence should be provided to demonstrate that the proposed off-site play provision fully satisfies the needs of the development whilst

continuing to meet the needs to existing residents. Subject to addressing this requirement of the SPG, Merton Council should secure the off-site play provision of the 5-11 and 12+ age brackets (creation of new provision, improvements to existing play facilities and/or an appropriate financial contribution) within a legal agreement, accordance with the Policy S4, 3.16 and the Play and Informal Recreation SPG.

Urban greening:

The applicant has calculated the UGF of the proposed development as 0.38, which is close to meeting the target of 0.4 set by Policy G5 of the ItP London Plan. The urban greening design appears to be maximised, and there are clear constraints in that the site area includes a large area of public realm adjoining the highway. The UGF of 0.38 is therefore accepted in this instance.

Air quality:

The applicant's air quality consultant has addressed all comments submitted during Stage 1 consultation. The revised assessment continues to predict a 'moderate adverse' air quality impact at one existing location. However, given that the development results in a reduction in vehicle traffic and is also considered to be air quality neutral, it is likely that this impact is over-estimated due to the use of a street canyon tool in the air quality dispersion model. Moreover, the adverse impact is limited to a very small area, and concentrations remain below the relevant air quality objectives. Therefore, the air quality impacts are considered acceptable - the development complies with London Plan Policy 7.14 (B) and Intend to Publish London Plan Policy SI 1 (B). There are no further outstanding items relating to London Plan air quality policy.

Energy:

A bit more information is needed on energy costs and overheating.

Other strategic issues:

Note there are outstanding comments from the GLA Stage 1 in respect of inclusive access, equalities and the circular economy, to be addressed.

- 5.5 Future Merton (Waste) – Waste services will work with developers at every stage to ensure the waste arrangements are satisfied. The clearance height of the overcroft would allow a refuse track to be able to enter and exit the site for onsite refuse collection.
- 5.6 Environment Agency – We have assessed this application as having a low

environmental risk. We therefore have no comments to make.

5.7 Councils Highways Officer

Whilst the Construction Logistics Plan provides basic details this must be conditioned to ensure a full detailed CLP is submitted and approved by the Council.

Please note that the left turn show in yellow routing on the vehicles delivery plans at South Wimbledon junction approach is very tight and should be assessed.

All standard conditions need to be applied to this site, including reinstatement of existing crossovers, and the requirement that they must contact highways before any works commence on site to ensure all required highway licences are in place

5.8 Councils Urban Design Officer

There are a number of high-level elements of the design which mark this proposal out as fitting in well with its surroundings and being of well thought out, high quality design. Separating the development into three elements and the creation of a new public open space are good. The landmark corner with its curve works well and is subtle. The height and massing are appropriate. The open colonnade creates a good and wide pedestrian space. The materials and detailing are also good with a logic and local relevance to them. The way the design has evolved to increase the number of dual aspect units is also welcomed. In contrast there are a range of issues at the more detailed level which it is considered require further development, and these are listed below.

1. There remain issues with the quality of the residential units within the rear service yard. Their aspect is poor and light levels will be poor. They site either side of the refuse access and the larger unit is accessed from the service yard access. This is not a good approach from street to front door.
2. The tracking shown in the DAS is only shown for vehicles entering and should show how vehicles exit as well. The service bay is narrow and requires unloading onto the clear zone for the disabled parking.
3. The route from the concierge lobby to the service yard required people to walk across the disabled bay clear zone and through a very cramped space. This is also the access for larger cycles.
4. Lifts appear to be separate from the stairwells. This is not good in terms of orientation around the building and providing a clear, comfortable and easily navigable way to individual flats.

5. The duplex flats facing Trinity Road have upper balconies (the main amenity spaces) accessed via bedrooms, which is not convenient nor does it respect individual privacy. The ground floor external space presents a difficulty balancing the need for privacy with the need for natural surveillance and a pleasing aspect to the building. Currently the frontage has high fencing/planting which gives the frontage a dead and unattractive feel. The useable area of this space is sub-standard as half of it is for bins and access – is this being counted towards the required amenity space? Doors open directly into living spaces which is not a good arrangement – a lobby or corridor would be better.
6. The internal arrangement for the YMCA bike store is very tight to manoeuvre bikes within. The way out is not very clear and has awkward turns through three doors to get to the street.
7. The YMCA first floor rooms to the north will have a very close and poor aspect to a generator compound – visual and noise issues?
8. There remains a number of very irregular shaped units which make for poor internal layouts, especially when they are already at or very close to the minimum standards. London Plan policy D4 stated that internal layouts should be efficient. No dimensions are given for internal rooms and not all furniture is shown as required by the Mayor's Housing SPG. The clear zone around beds in the middle block 1b2p units is fouled by the internal wall. No dual aspect units attempt to provide separate or self-contained kitchen areas. Bedrooms accessed directly off living spaces is not good internal design, nor is bathrooms opening directly next to kitchens. The plans need to demonstrate that all relevant standards in the NTS, London Plan, building Regulations and housing SPG are all adhered to and exceeded where possible.
9. The housing mix relies heavily on 1b1p units. These one-person units should not be able to accommodate double beds – in some cases this may be possible. Some configurations could work better as studios – having a separate kitchen rather than separate bedroom.
10. The corner block does not share the same building line on The Broadway – projecting forward. This should relate to the YMCA building better.
11. The YMCA end units (to the north) have large obscure glazing when unnecessary – high level windows might be better.
12. There is only one access to the large gym area and this is through the already cramped café. Would it not be better to have an additional internal access to these areas (eg. take out one of the consulting rooms)? The café is already small and it is

set in the busy entrance lobby. It is questionable as to how attractive and viable a place this will be.

13. On the middle block the balcony partitions do not align with the party walls and the external frame. Surely this is a drafting error as this is a very odd arrangement. Thus the elevation shown in the CGI would appear to be inaccurate and will not appear as regular in form as suggested. This needs re-appraising.
14. The office layout for the YMCA appears cramped and may not work as shown – is it designed to any particular standards?
15. Does the Laundry Room need to be accessed directly off the lounge rather than from a corridor?
16. Do the YMCA kitchens have sufficient seating for residents – notably in relation to the large number of base units provided?
17. The proposed ‘concrete blocks’ for the public footway and new open space is unacceptable and must be of a high quality. The materials for the footway should be York stone and the open space should be granite. A more detailed landscape design is required for this. This is considered acceptable by other developments in Wimbledon and there should be no exception for this.
18. At the north end of the residential block there are large private patios – about half the size of the flats they belong to – but which appear to have no direct access from the flats, requiring the owners to leave their flats and access them via the communal corridor. This is not a satisfactory arrangement.
19. The servicing for the commercial unit in the centre could easily be accessed from the adjacent internal corridor, rather than requiring goods to pass into the public open space.

5.9 Councils Climate Change Officer - (No objection subject to conditions)

Subject to final comments from the GLA, I am content that the proposed energy approach is policy compliant, achieving a 76% improvement against Building Regulations for the domestic elements and a 71% improvement for the non-domestic elements (based on the latest modelling provided on 18th November), which exceeds the minimum sustainability requirements of Merton’s Core Planning Strategy CS15 (2011) and Policy 5.2 of the London Plan. The energy statement, and updated energy modelling, submitted for the development indicate that it will achieve a 10% and 11% saving in CO₂ emissions through fabric performance for the domestic and non-domestic elements respectively, with the remainder secured through the use of communal Air Source Heat Pump systems in each of the blocks and 61.4 kWp of Photovoltaic (PV) panels as a biosolar roof with high efficiency panels. This will need to be secured by condition.

I am satisfied that, in the absence of an existing heat network, this approach is compliant with the Mayor's energy hierarchy approach outlined in Policy 5.2 of the London Plan (2016) and Policy CS15 of Merton's Core Planning Strategy (2011). However, the applicant has provided a commitment that the development is designed to allow future connection to a district heating network in line with the GLA's Guidance. This will need to be secured by condition.

The GLA has indicated that the application should be conditioned to review the potential for further passive measures prior to the commencement of above ground works given that the applicant has not achieved the GLA's 15% target for the non-domestic elements using SAP 10 carbon emissions factors. This is still to be confirmed following the applicant's latest comments to the GLA. I have provided some draft wording below, subject to the outcome of the Applicant's discussion with the GLA.

The internal water consumption calculations submitted for the development indicate that internal water consumption in the residential units should be less than 105 litres per person per day in line with Merton's requirements. This will need to be secured by condition.

The BREEAM design stage assessments provided by the applicant indicate that both the proposed retail unit and hostel will achieve a BREEAM standard of 'Very Good' which meets the minimum requirements in Merton's Core Planning Strategy Policy CS15. This will need to be secured via condition.

The final carbon offset contribution of £51,428 (based on the latest energy modelling provided on 18th November) will need to be secured via the S106.

5.10 Future Merton (Planning Policy)

Overall, the proposal is supported concerning the contribution it will make to meeting Merton's strategic housing target and creating mixed sustainable communities that reflects the diversity of the population.

Housing mix:

Core Strategy Policy DM H2 (Housing mix) and Draft Local Plan policy H4.3 (Housing Mix) both set out a preferred bed unit size mix of roughly 33% even split for 1, 2 and 3+ bed units. However this requirement must be applied having regard to a number of relevant factors including site circumstances, site location, identified local needs and economics of provision such as financial viability or other planning contributions.

Having assessed the planning arguments put forward by the applicant and taking account the individual circumstances of this proposal, it is considered on balance that the justification for the proposed housing mix in this case is justified. The site is in an area of high PTAL accessibility making it appropriate for flatted housing development. Wimbledon has a high existing prevalence of family sized accommodation compared to the rest of the borough. Hence the proposal contributes to providing greater choice in housing size mix in Wimbledon. Whilst it would be preferable, in this case for the provision of a greater number of 2 bed units than proposed, the applicant has provided a supporting viability justification for the mix proposed.

Affordable housing:

It is noted that the applicant's viability assessment indicates that in planning terms whilst the new hostel units will be considered *sui generis* in reality the units will be let at sub-market rents at £124 per week "covered by the benefits system."

Merton's SHMA (table23) states that the lower quartile market rent for room only is £500. Therefore, Planning Policy supports the applicant's position.

5.11 Council Transport Planning - (No objection subject to conditions and S106 agreement)

The site is currently occupied principally by the YMCA including ancillary gym and café uses, as well as Olympic House which is a six-storey commercial building to the west of the YMCA. The existing YMCA facility contains 111 bedrooms.

Surrounding Road Network

The Broadway:

The Broadway is a two-way single carriageway road and forms part of the A219, which links the A24 in South Wimbledon with the A4 in Hammersmith. In the immediate vicinity of the site, The Broadway is approximately 9m wide and subject to a speed limit of 30mph.

In immediate vicinity of the site, single-yellow lines restrict parking along either side of the carriageway from Monday to Saturday between 07:00 – 23:00 and Sunday between 14:00 – 18:00. No loading is permitted along this road section between Monday and Saturday from 07:00 – 10:00 and 16:00 – 19:00.

Pay & Display' on-street parking bays are present along the northern side of the carriageway at the south-western edge of the site, which are operational between Monday – Saturday from 08:30 – 23:00 and Sundays from 14:00 – 16:00 and are restricted to a maximum stay of 2 hours. Outside of these hours, parking is free for 20 min and stays restricted to maximum of two hours. Double-yellow lines are present at junctions with minor roads, prohibiting parking at all times.

Trinity Road

Trinity Road is a two-way single carriageway that runs in a north-south alignment from Queen's Road to The Broadway. The road is subject to a speed limit of 20mph and serves mainly residential properties as well as the car park of the existing YMCA building and ancillary facilities. Speed humps and traffic calming features in the form of road narrowing are present in regular intervals to calm traffic within this residential area. In the immediate vicinity of the site, single-yellow lines are present on either side of the road that restrict parking from Monday to Saturday between 08:30 – 23:00 and Sunday between 14:00 – 18:00.

At its northern extent, Trinity Road adjoins Queen's Road via a staggered junction, with a Zebra crossing provided on the eastern approach of the junction. At its southern extent, Trinity Road forms the northern arm of a signalised junction with The Broadway and Montague Road.

PTAL

The site has a Public Transport Accessibility Level (PTAL) of '6(b)' with a portion of the site rated as '6(a)' which is excellent and is well located for all the facilities and services.

PROPOSED DEVELOPMENT

The proposed development comprises the following elements:

Phase 1

Demolition of Olympic house and part of YMCA and erection of a 121 room homeless hostel (sui generis) with ancillary gym and café.

Phase 2

Demolition of remainder of site and erection of 135 residential units including 1 x studio, 108 x 1-beds, 25 2-beds, 1 x 3-bed; flats and 333sqm of flexible class A1 (excluding supermarkets).

Access

The existing vehicle access to the site and car park is from Trinity Road. The access to the proposed development will be retained from Trinity Road although, following the demolition works on the site, the access will be located on the northern boundary of the site approximately 10 metres to the north of the current position. The access will be gated but the gate will be set back 14m from the edge of the carriageway so that any vehicles entering the site do not obstruct either the carriageway or the footway on Trinity Road whilst waiting for the gates to open.

Alongside the vehicle access there will be a delineated path for pedestrians and cyclists to access the cycle parking and two of the ground floor residential units. This footway along the access will be over-runnable to allow for servicing vehicles to pass other vehicles entering and exiting the car park at the same time.

Additional pedestrian accesses into the development will be provided on both Trinity Road and The Broadway.

Car Parking

No car parking is provided within the development, apart from a total of four parking spaces for disabled users which will be provided within the site. All parking spaces will be equipped with active provision for the charging of electric vehicles.

Permit free option would be acceptable subject to the applicant enters into a Unilateral Undertaking which would restrict future occupiers of the units from obtaining an on-street residential parking permit to park in the surrounding controlled parking zones to be secured by via S106 legal agreement.

Cycle Parking

A total of 224 cycle parking spaces will be provided on-site. This will comprise the following:

188 residential cycle parking spaces located within a cycle store on the first floor of the development; two spaces for enlarged cycles on the ground floor; and

10 cycle parking spaces for the proposed YMCA development;

24 short stay cycle spaces will be provided for visitors and will be located within the public realm at the front of the development.

Cycle parking provision satisfies the 'London Plan' standards and is acceptable.

Servicing

All servicing at the site will be undertaken from within the development and not from The Broadway or Trinity Road.

Tracking has been undertaken to demonstrate that the refuse vehicle can access and turn within the site to allow for egress in a forward gear.

Deliveries to the commercial units will also be undertaken from within the development. A dedicated LGV bay has been provided within the rear parking courtyard to allow deliveries to be undertaken without obstructing the remainder of users of the parking area. This bay will also accommodate LGV deliveries to the residential units.

A separate Delivery and Servicing Plan has been prepared in support of the application which provides further details of the servicing and delivery arrangements and management of the space.

Travel Plan

Framework Travel Plan (FTP) document has been prepared by the applicant.

The initiatives contained within the FTP will be supported by the developer for a five-year period from first occupation of the development.

Trip Generation

The number of person trips likely to be generated by the proposed development will be low and consequently the development proposals would not have a material impact on the operation of the public highway or public transport network.

The removal of the existing car park on the site will reduce vehicle trips to and from the development.

The Transport Assessment determines the number of additional trips that would arise as a result of the additional units and I would concur with its conclusions that the increase will be insignificant.

Construction Vehicle Routing

Full details regarding the programming and phasing of the works should be provided upon appointment of a contractor to undertake the works. The details to be provided within the full CLP prior to works be undertaken.

Construction Logistics Plan

The submitted Construction Logistics Plan outlines the strategy for managing and monitoring the impacts of the construction of the proposed development on the site, neighbours and the surrounding highway network.

A full CLP for each phase of development should be submitted prior to construction commencing, upon appointment of a contractor.

For future safety and movement in close proximity to the signalised junction at Trinity Road the Council will look to introduce all day waiting and loading restrictions (24hr) on the Broadway and into Trinity Road via a S106 contribution. This level of restriction has not been in the past deemed necessary as the existing site has more extensive rear servicing and hence on-street demand for loading is low.

Subject to the above, the proposal is unlikely to have a significant impact on the adjoining highway.

5.12 Metropolitan Police (MET)

The section 8.4 of the design and access statement mentions the Designing Out Crime and Secured by Design listing some of the items discussed at the meeting.

Having given due consideration to the details of the security and safety features from the information provided, I have a few comments and recommendation.

I have concerns regarding the back of house links and the use of the rear courtyard between the residential, YMCA and the commercial units. Residential communal areas including the car parking area should be clearly defined with no linkage between the other uses to reduce anonymity and casual intrusive crime.

Vehicle access to the residential car park area should be restricted by fob controlled roller shutters, unrestricted vehicle and non-resident access is not acceptable within SBD.

The residential block on numerous levels shows corridors and doors providing links between the cores, via the bin store, the cycle store or communal amenity. Buildings of this design can suffer adversely from anti-social behaviour due to unrestricted access to all areas and floors. If unable to change the design to prevent unlawful free movement throughout the building the use of a programmable encrypted access control system is required for internal doors leading to cross core areas. The access control system must incorporate an electronic release to allow the fire service free access to all of the communal areas of the building.

The wide overhang soffit of 2.3m may offer the chance for groups to loiter or provide an area for rough sleeping which is a common occurrence in locality. The overhang should be reduced, a management plan in place to dissuade groups and support provide to the rough sleepers.

Mailbox provision needs to be considered in the entrance lobby, preferably externally delivered and internally collected. This will mitigate the theft opportunities of post, a prevalent offence in London which often leads to identity and financial fraud offences.

A zoned fob controlled system should be installed to control access throughout the block. This can assist with the management of the development and allow access to residents to specific designated areas only. Any trades persons buttons must be disconnected. The fobs should always be encrypted to reduce the risk of them being copied by a third party.

CCTV should be installed to cover the entire development, particularly the external elevations, rear courtyard and its access, and residential communal areas. Any lighting fixtures and the landscaping should not be in conflict with the CCTV cameras field of view. All CCTV systems should have a simple Operational Requirement (OR) detailed to ensure that the equipment fitted meets that standard, without an OR it is hard to assess a system as being effective or proportionate as its targeted purpose has not been defined. The OR will also set out a minimum performance specification for the system. The system should be capable of generating evidential quality images day or night 24/7. For SBD CCTV systems there is a requirement that the system is operated in accordance with the best practice guidelines of the Surveillance and Data Protection Commissioners and the Human Rights Act.

The cycle stores must be part of the developments access control system, and have appropriate CCTV coverage to provide identity images of those who enter and activity images within the space; this may mean multiple cameras depending on the design and size of the each storage area.

Due to bicycles being so attractive to thieves, the cycle storage lockable doors should only be accessible to residents. The locking system must be operable from the inner face by use of a thumb turn to ensure that residents are not accidentally locked in by another person. The cycle storage should incorporate stands or racks secured into concrete foundations, which should enable cyclists to use at least two locking points so that the wheels and crossbar are locked to the stand rather than just the crossbar.

The enlarged cycle parking should be a lockable store rather than a space. The short stay cycle spaces in Trinity Road should be relocated within the public realm at the front of the development to benefit from greater surveillance.

From experience the shared amenity roof space easily suffer residential conflict due to antisocial behaviour and out of hours use. Complaints are often made due to noise nuisance, damage, unauthorised access issues and inappropriate use of the amenity. The roof terraces will require a robust management strategy and residential compliance in order to establish regulations of use in order to mitigate residential disquiet, including a 'cut off' time to prevent unwanted noise nuisance in the early hours.

The design of the community amenity roof terrace must have high perimeter screens to prevent items being thrown, or person falling or jumping off. Any plant containers must eliminate the chance to climb over any balustrades.

Play-areas must be designed with due regard for natural surveillance which does not appear to be the case in this proposal as the area is not overlooked.

Play-areas should have adequate resources for its satisfactory future management and that they can be secured at night to reduce the amount of damage and graffiti that occurs after dark. The equipment should be secured in place so cannot be thrown off the roof.

Any landscaping in the planters and the communal roof garden should allow opportunity for natural surveillance by shrubs being selected to have a mature growth height no higher than 1 metre, and trees should have no foliage, or lower branches below 2 metres thereby allowing a 1 metre clear field of vision. Planting should not compromise lighting or the CCTV field of view.

I am concerned that the only proposed lighting for the proposed public space is four bollard lights within the planted area, this needs to be reconsidered. All lighting across the entire development should be to the required British Standards and local council requirements, avoiding the various forms of light pollution (vertical and horizontal glare). The lighting should be as sustainable as possible with good uniformity. Lighting can contribute to discouraging crime and vandalism making people feel secure and so encourage increase pedestrian activity. SBD asks for white light as this aids good CCTV colour rendition and gives a feeling of security to residents and visitors.

Bollard lights, illuminated benches, architectural and tree up lighting are not considered as good lighting sources for SBD purposes, so should be avoided. The public space lighting should also meet the current council requirements.

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

Recommended 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 the principles and objectives of 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 14 (22.17) of Merton Core Strategy: Design, and Strategic Objectives 2 (b) and 5 (f); and Policy 7.3 Designing out Crime of the London Plan.

B. Prior to occupation a Secured by Design final certificate 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 improve community safety and crime prevention in accordance with Policy 14 (22.17) of Merton Core Strategy: Design, and Strategic

Objectives 2 (b) and 5 (f); and Policy 7.3 Designing out Crime of the London Plan.

The appropriate Secured by Design (SBD) requirements can be found in the design guides on the SBD web site www.SecuredbyDesign.com.

5.13 Councils Flood Officer - (No objection subject to conditions)

I've reviewed this application and have noted that the impermeable area on site is increasing from 3090m² to 3500m² on a site of size 3650m². I understand that the site lies predominantly on clay which makes infiltration near impossible as clay was reached at 1m b.g.l from the site investigation tests carried out. They are proposing green roof and tanked attenuation storage. I think more could have been done with the site in terms of having more open space and incorporate this with the attenuation planned. The development is planned to be built in two phases and the attenuation tank is situated within phase two. You will note that the condition requires that there must be an agreed scheme before commencement of any phase of development.

5.14 Greenspaces – No response received.

5.15 Councils Structural Engineer

The basement which is approx. 4.5m deep below ground level is at a distance of 9.5m from The Broadway and greater from Trinity Road. Therefore, from a highway perspective, the basement works do not require any conditions.

However, there are piling works adjacent to the highway boundary. For this reason, should you be minded to recommend approval, we would advise that the following condition is placed on the decision notice:

No works will commence on site until the below documents have been submitted and agreed by the Local Planning Authority.

- a) Detailed Demolition Method Statement produced by the Contractor appointed for demolishing the existing buildings.
- b) Detailed piling methodology produced by the Contractors appointed for the piling.
- c) Structural drawings of the piles adjacent to the highway boundary.
- d) Movement monitoring report produced by specialist surveyors appointed to install monitoring gauges to detect any movement of

the highway/neighbouring properties from pre-construction to completion of the project works as recommended by the Construction Method Statement. The report should include the proposed locations of the horizontal and vertical movement monitoring, frequency of monitoring, trigger levels, and the contingency measures for different trigger alarms.

- 5.16 Historic England (GLAAS) – Do not wish to offer any comments.
- 5.17 Historic England (Parks) - No response received.
- 5.18 Garden History Society – No response received.
- 5.19 Council's Environmental Health Officer (Air quality) - (No objections subject to conditions).

The applicant has submitted an Air Quality Assessment report Ref: No. 443781/AQ/01 (03) dated May 2020 and completed by RSK.

The assessment shows that the building emissions are within the air quality neutral benchmarks and that the transport emissions are also within air quality neutral emissions benchmarks for transport, therefore the development is considered to be air quality neutral. Predicted impacts on NO₂ PM₁₀ PM_{2.5} concentrations as a result of operational phase exhaust emissions were predicted at various sensitive receptor location within the vicinity of the site and was predicted to be not significant at all locations. During 2025, when the development is expected to be fully operational, the AQS objectives for NO₂, PM₁₀ and PM_{2.5} are predicted to be met at all existing receptor locations considered in the assessment.

- 5.20 Environmental Health (Contamination) – No objection subject to conditions.
- 5.21 Transport For London (TFL)

Original Comments

I write to provide detailed strategic transport comments on this application reference 20/P1738. These provide more detail on the matters raised in the GLA Stage 1 Planning Report 2020/6363/S1. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

Please note that these comments represent an officer level view from Transport for London and are consistent with the Mayor's initial response to the application at Stage 1.

The 'Intend to Publish' (ItP) London Plan was submitted to Government in December 2019, and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

TfL expects all current planning proposals to consider the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies.

Proposed Development

The proposal consists of redeveloping the site to provide a mixed-use development comprising a 121 room homeless hostel, 135 residential units and 333sqm of flexible commercial floorspace.

Location

The site is located in Wimbledon Town Centre and is bound by the A219 The Broadway to the south, Trinity Road to the east, commercial uses to the west and residential properties to the north. The closest section of the Transport for London Road Network (TLRN) is the A24 Merantun Way approximately 1km southeast of the site. Whereas, the closest section of the Strategic Road Network (SRN) is the A238 Kingston road located approximately 450m to the south of the site. The Wimbledon to Raynes Park Quietway route starts at the Francis Grove / St George's Road junction.

Wimbledon Station which provides access to rail, underground and tram services is located approximately 700m north west of the site. Bus stops are located on The Broadway, Sir Cyril Black Way and at Wimbledon Fire Station providing access to nine routes (131, 57, 152, 163, 164, 219, 200, 93 and 156).

The site has a Public Transport Access Level (PTAL) of 6b, on a scale of 0 to 6b where 6b is the most accessible.

The site is also located within the Future Wimbledon Masterplan area.

Crossrail 2

TfL and Network Rail are jointly promoting Crossrail 2 and a business case has been submitted to Government. The central safeguarded route

(Tottenham to Wimbledon) was consulted upon in 2014/15 would include higher frequency services to Wimbledon Station. If committed, the route could be operational from 2031 and works could commence between 2021 and 2031.

The proposed development site sits outside the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction.

Vehicular Site Access

There will be no direct vehicle access to the site from the TLRN. Vehicular access to the site is via Trinity Road.

Healthy Streets

The proposed development will see an increase in pedestrian and cycle trips to/from the site and the local area. Whilst the redevelopment will provide some public realm improvement along The Broadway, there is no information contained within the TA to demonstrate how the development will deliver improvements that support the ten Healthy Streets Indicators throughout the site and within the local area. The TA should identify opportunities to improve provisions for cyclists and pedestrians in the area and encourage the use of public transport.

Vision Zero

The Mayor's Vision Zero ambition is the elimination of all deaths and serious injuries from London's streets by 2041. The Vision Zero approach requires reducing the dominance of motor vehicles and creating streets safe for active travel.

Accident analysis has been provided and whilst it doesn't identify measures which can be used to eliminate any of these accidents, the car free nature of this development will contribute towards the Vision Zero approach.

Car parking

The development is car free with the exception of 4 disabled person's car parking spaces which is in accordance with Intend to Publish (ItP) London Plan standards. The ItP London Plan requires that disabled person's parking should be provided for 3% of dwellings, at the onset. All car parking spaces will include active electric charging facilities. A Car Parking Management Plan, detailing how the disabled car parking spaces will be managed and monitored and where additional spaces could be provided

should demand arise, including confirmation that the spaces will be leased and not sold, should be secured through the section 106 agreement.

Trip generation and modal split

The trip generation assessment is acceptable and has been undertaken using the industry standard TRICS database and Census data for mode share.

Public Transport

The proposed development is predicted to generate 63 two-way public transport trips within the AM peak hour and 71 in the PM peak hour. Given the number of public transport services in close proximity of the site, the uplift in public transport trips will not result in capacity issues on these services.

Cycle Parking

The TA states that 224 cycle parking spaces are proposed for all uses on site. Of these 188 long-stay cycle parking spaces are provided for the residential element of the development on the first floor accessed via two bike lifts. In order to determine if the long-stay provision accords with ItP London Plan standards, further information is required on the gross internal floor area of the 1 bed residential units to clarify if they are 1 or 2 person units.

All cycle parking is required to be designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). Further, information is required on the type of long-stay cycle parking proposed. At least 5% should be Sheffield Stands at wider (1.8m recommended) spacing for larger / wider cycles. LCDS states they should be used in conjunction with accessible stands. Two tier racks need a 3.0m aisle width (2.5m in front of the lower top tier rack. Applicant to highlight route to the cycle store located in the YMCA element of the development to ensure it is well located and avoids obstacles such as multiple doors, narrow doorways (less than 1.2 metres wide) and tight corners. Further work is required to demonstrate that the cycle parking proposed accords with the LCDS. TfL would also recommend that the residential storage area is broken down into smaller areas for security.

TfL would also advise that shower and locker facilities are also provided for the commercial uses for those members of staff wishing to cycle to work.

Travel Plan, Servicing and Construction

A Framework 'p'Travel Plan has been provided. The full Travel Plan should be secured, enforced, monitored and reviewed as part of the s106 A Framework Delivery and Servicing Plan (DSP) has been provided. It is proposed to undertake all servicing off-street.

A Construction Logistics Plan (CLP) has been provided. This needs to be produced in line with TfL's latest guidance and the requirement for a full CLP should be secured by condition.

Mayoral CIL2

Mayoral CIL2 within the London Borough of Merton is payable at a rate of £60 per sqm.

Summary

In summary, TfL requests that further information is provided before we can fully assess and be supportive of the proposed development. Specific mitigation measures and further work is summarised below:

- Further work required to demonstrate how the development contributes towards the 10 Healthy Streets indicators both within the site and the wider area.
- Car Parking Management Plan to be secured.
- The applicant should provide clarification on the gross internal floor area of the 1 bed residential units to determine if they are 1 or 2 person units, so that we can determine if the cycle parking provision is in accordance with the ItP London Plan.
- Further work to demonstrate cycle parking is designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS).
- Further, information is required on the type of long-stay cycle parking proposed - at least 5% should be Sheffield Stands.
- Highlight route to the cycle store located in the YMCA element of the development to ensure it is well located and avoids obstacles.
- Residential storage area to be broken down into smaller areas for security.
- Shower and locker facilities should be provided for those members of staff wishing to cycle to work
- Travel Plan to be secured, monitored, reviewed, and enforced through the s106.
- A Delivery and Servicing Plan to be secured by condition
- A Construction Management Plan (CMP) to be secured by condition.

Comments following further information submitted by the applicant:

The Technical Note (TN) includes a Healthy Streets Check for Designers. The Healthy Streets check for designers should only be used where there are physical works to the public highway that are likely to cost in excess of £200k and should not be applied to the site as a whole. This is because the check for designers has to be audited by TfL to make sure it has been undertaken correctly and does not overestimate the scheme's Healthy Streets benefits.

Further work has been undertaken in terms of assessing the quality of the key routes surrounding the sites and recommendations for improvements have been made. However, the TN states that the applicant is not proposing to deliver any of the pedestrian and cycle improvements identified. Given the improvements are all on borough roads it is for Merton to decide if a contribution towards these improvements are secured.

Further information has now been provided on the size of the 1-bedroom units and the long stay cycle parking provision accords with the ItP London Plan.

The TN states that cycle parking has been designed with reference to the London Cycle Design Standards, however a compromised approach has had to be taken. TfL have concerns that the majority of long-stay cycle parking proposed (with the exception of 2 enlarge spaces) is shown as two-tier, and that these would not meet minimum aisle widths. This type of cycle parking is not user friendly, takes longer to use, and promotes the wrong type of crammed cycle parking stores. Furthermore, two tiered racks are not accessible to all. Not everybody can lift a cycle or bend down under a rack to lock their cycle and some cycles won't fit on it.

The TN states with regards to the enlarged cycle parking provision, the amount of enlarged cycle parking is a recommendation only and is not a policy requirement. The TN also states that there is no requirement set out within either the ItP London Plan or LCDS requiring the cycle parking to split up into smaller areas. This is a disappointing approach from the applicant. Poor quality cycle parking will significantly undermine the cycling strategy for the site and will not be well used.

The applicant has confirmed that shower and locker facilities will be provided in all commercial units and the leisure and community centre.

5.22 Thames Water

Waste Comments

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.

“No properties shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents.

The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces

contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent.

Applications should be made at

<https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information : www.thameswater.co.uk/advice

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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, 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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.

No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development”

The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you

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

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, 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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

Foul water is to reuse the existing connection in the Broadway between 4402 and 5403 - Foul Discharge is within sewer threshold hence capacity exists. Letter 2 can be sent Surface water will be limited to 5l/s and will use the existing connection into the sewer in The Broad Way. Between chambers 4401 to 5402. - Developed Land is roughly 0.4ha hence the proposed 5l/s is high and needs to be reduced to be in line with London Policy 5.13 (5l/s/ha). A Surface Water discharge between 2-3l/s will be acceptable.

5.23 Environmental Health Officer (noise) – No objection subject to conditions.

5.24 Design and Review Panel (November 2019)

Firstly, the Panel welcomed the changes made since the previous review and felt the proposals were a significant improvement on the previous tower-based scheme. It was considered by the Panel that this was the closest they had seen to a workable proposal for the site, which could be acceptable in design terms, and also be commercially viable. The Panel

encouraged the applicant to further develop and refine the proposals based on their comments.

The scale, height and massing were considered generally appropriate and the quality of the architecture was developing well but needed further work, though the proportions and stratification of the façade worked much better. On Trinity Road, it was felt that the stepping down of the massing provided a coherent façade but could benefit from some finessing to reduce the height impact on this street. The inclusion of the internal courtyard was welcomed and felt had the potential to work well. The ground level soffit overhanging the widened footway was welcomed and well liked – as was the proposed organic detailing. It was felt that this could be at risk of succumbing to value engineering and that, if proposed, then the applicant should see it through to completion, and include detailed design proposals in the planning application.

The public open space was welcomed and liked, but it was felt that care needed to be taken to design it well, to be effective with different building uses at ground floor, and acknowledge that it was next to a busy road. It was felt that there was a balance to be had between ensuring a good sized and workable space and ensuring the rear of the building was not too overbearing to the housing to the north. This issue was one of the main concerns of the Panel and it was felt that this needed further testing with verified views from the rear and sun/daylight analysis to better inform the impact of the building.

The Panel noted the design was proposing three building elements but felt that there were currently weaknesses in the design in this respect. It was not sufficiently clear whether the building was three or two elements and the applicant needed to decide which way to go. If the form was to be three elements then there needed to be more differences in the architectural approach, rather than primarily a change in brick colour. The Panel also felt that the interface between the YMCA and the immediately adjacent residential building was not sufficiently clear, nor working well architecturally. This needed further work.

Related to this was the use of curved corners. The Panel acknowledged that the applicant was responding to the 'Wimbledon DNA' as previously advised. However, it was suggested that there were a range of reasons to explain the existing curved corners in Wimbledon and the applicant should not necessarily have too simplistic interpretation of this. Nevertheless, whilst the Panel were not particularly advocating removal of the curved corner at the Trinity Road junction, they did note that the other three corners did not have curves and the building did need to relate positively to these other buildings.

The Panel felt that the other curved element – at the YMCA entrance – was not on a prominent corner so there was less justification for this. It was felt that this corner defined one side of the open space so had to relate well to the opposite corner. It was suggested that each corner needed to be treated in the same manner to help unify the space, whether curved or otherwise. Further thought was also required to ensure the uses surrounding the space supported its success, and how these could define its character. The potential for it to fail in this respect needed to be guarded against, the successful space at the Aga Khan building in Kings Cross was cited as a good precedent in this respect.

It was felt that the sustainability credentials of the building were currently weak and had not been fully developed. The roof spaces needed to be put to full use, whether for open space or green/brown roofs, wildlife and ecology promoted and the general environmental performance of the building improved. It was felt that many flats could suffer from overheating and the dual aspect units were too long and thin to achieve proper cross ventilation

The Panel had a range of comments and concerns on the quality of the residential accommodation. The increase in dual aspect units was welcomed, as was the introduction of the internal lightwell. However, the overall quality of the accommodation was probably the most singular and unanimous concern the Panel had about the proposal. This included the quality of the ground floor units and their single aspect outlook – either onto a street with amenity space facing the road or at the rear with the amenity space part of the service yard and secluded by the bulk of the building to the south and east.

Dual aspect flats were considered too deep and unlikely to ventilate properly. There were a very high number of studio flats and this was questioned, and whether it related to housing need or demand at all. There were no 3-bed units yet there were opportunities for larger units at upper levels in relation to the larger terrace spaces. Some of the flat layouts internally also did not look well resolved. Single aspect south facing flats were likely to overheat and this could be addressed in part by having smaller windows and more opening windows. The Panel felt that one should be happy to live in any one of the proposed flats, yet this was far from the case at present.

Whilst the Panel liked the general efficiency of the centre of the building and the third level start to the internal courtyard, there was some concern that having one central bin, bike and general storage area was impersonal and having 140 units serviced by only three cores was an symptom of over development.

The YMCA building was more well resolved externally but the Panel still had some queries about the internal layout. It was felt that one needed to make the most out of creating a new YMCA and this was a rare opportunity. The building should be a friendly and exciting place and be dignified, therapeutic and nourishing – being particularly important for vulnerable people. It was felt that the long corridors and position of consulting rooms did not help with this, and there was some disconnect with the YMCA bedrooms and the main public space. The YMCA also needed to stand out and not be overpowered by the adjacent residential building. There also seemed to be a significant lack of cycle parking for the YMCA.

The Panel considered the proposal a potentially a very elegant building. The general direction of travel good and significant progress had been made on the design and layout. However, many of the issues raised were felt to be symptomatic of overdevelopment and the Panel felt that there was a case for some reconfiguration to ease this, notably by removing the residential units from the ground floor and possibly a marginal loss of units. An acceptable relationship to the housing to the rear needed to be demonstrated.

VERDICT: AMBER

6. **POLICY CONTEXT**

6.1 Merton Sites and Policies Plan – 2014 (SPP)

DM C1 Community facilities
DM C2 Education for children and young people
DM E1 Employment areas in Merton
DM E2 Offices in town centres
DM E3 Protection of scattered employment sites
DM E4 Local employment opportunities
DM H2 Housing mix
DM H3 Support for affordable housing
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 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 R1 Location and scale of development in Merton's town centres and

neighbourhood parades
DM T1 Support for sustainable transport and active travel
DM T2 Transport impacts of development
DM T3 Car parking and servicing standards
DM T5 Access to the road network

6.2 Merton Core Strategy – 2011 (Core Strategy)

CS1 Colliers Wood and South Wimbledon
CS6 Wimbledon Town Centre
CS7 Centres
CS8 Housing Choice
CS9 Housing Provision
CS11 Infrastructure
CS12 Economic Development
CS13 Open Space, Nature Conservation, Leisure and Culture
CS14 Design
CS15 Climate Change
CS16 Flood Risk Management
CS17 Waste Management
CS18 Active Transport
CS19 Public Transport
CS20 Parking, Servicing and Delivery

6.3 London Plan (2016)

3.3 Increasing housing supply
3.4 Optimising housing potential
3.5 Quality and design of housing developments
3.6 Children and young people's play and informal recreation facilities
3.8 Housing choice
3.9 Mixed and balanced communities
3.10 Definition of affordable housing
3.11 Affordable housing targets
3.12 Negotiating affordable housing on individual private residential and mixed use schemes.
3.13 Affordable housing thresholds
4.1 Developing London's economy
4.7 Retail and town centre development
4.8 Supporting a successful and diverse retail sector and related facilities and services
5.1 Climate change mitigation
5.2 Minimising carbon dioxide emissions
5.3 Sustainable design and construction
5.7 Renewable energy
5.10 Urban greening

- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 5.17 waste capacity
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.8 Heritage assets and archaeology
- 7.14 Improving air quality
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
- 7.21 Trees and woodland
- 8.2 Planning obligations
- 8.3 Community Infrastructure Levy

6.4 **Other**

- National Planning Policy Framework 2019
- National Planning Practice Guidance 2014
- London Plan 2016 - Housing SPG 2016
- Draft London Plan 2020
- Draft Local Plan 2020
- Merton's Viability SPD 2018
- Homes for Londoners - Affordable Housing and Viability SPG 2017
- National Design Guide (2019)
- LB Merton - Local Development Framework - Tall buildings Background Paper 2010.
- Future Wimbledon SPD 2020

7. **PLANNING CONSIDERATIONS**

- 7.1 The principal planning considerations relate to the principle of development, design, visual amenity and heritage assets, impact on neighbour amenity, standard of residential accommodation, flooding and drainage, transport and parking, biodiversity, contamination, sustainability, air quality, trees and affordable housing.

7.2 **Amendments**

7.2.1 Following discussions with officers, the applicant has made the following changes (reasons for changes can be seen in sections 3.11 – 3.20 of this committee report):

- Reduction in bedroom size of the 1b1p units so that bedrooms are smaller than the minimum space standard of a double bedroom (11.5sqm).
- Addition of 750mm zone around beds in 1b2p central block units
- Boundary treatment to ground floor duplexes on Trinity Road reduced from 1.5m height to 1.2m.
- Ground floor duplex gardens/bins store reconfiguration.
- Additional side door from servicing corridor to central commercial unit.
- Amendments to the enlarged cycle parking spaces to provide a secured and lockable store.
- Short stay cycle parking relocated from Trinity Road to central piazza).
- Provision of clear link from service yard to residential concierge lobby.
- Windows in YMCA amended to show perforated panels to avoid overlooking.
- Screen aligned with vertical mullions in central block façade facing The Broadway.

7.3 **Principle of development**

7.3.1 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.

7.3.2 Policy 3.3 of the London Plan 2016 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. The National Planning Policy Framework 2019 and London Plan policies 3.3 & 3.5 promote sustainable development that encourages the development of additional dwellings at locations with good public transport accessibility.

7.3.3 National Planning Policy Framework (NPPF) 2019 - Paragraph 122 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.

- 7.3.4 The site is an underutilised brownfield site which is considered to present opportunities for a more intensive mixed use development. The proposals would meet NPPF and London Plan objectives by contributing towards London Plan housing targets and the redevelopment of brownfield sites.
- 7.3.5 NPPF Paragraph 123 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.

Site Allocation

- 7.3.4 The application site is an adopted site allocation within Merton's Sites and Policies Plan as Site Allocation 62. Site allocation 62 is adopted as identifying the site as being suitable for a mix of retail (A1 Use Class), financial and professional services (A2 Use Class), restaurants and cafes (A3 Use Class), drinking establishments (A4 Use Class), offices (B1a Use Class), community (D1 Use Class), leisure/sporting uses (D2 Use Class), hostel (Sui Generis Use Class) and residential (including hotel, C3 and C1 Use Class).
- 7.3.5 It is important to note for the sake of the principle of development that the site allocation does not set minimum space standards for any of the potential uses. The principle uses on the application site have therefore already been through public consultation and adopted by the Council following a public hearing. The principle uses on the site have therefore already been established and are a strong planning consideration in the assessment of any planning application on the site.
- 7.3.6 As part of the site allocation, Merton's Sites and Policies Plan document sets out a number of issues relating to the allocated site, these will be discussed in the report below and include:
- This site is a corner site with an active frontage facing onto The Broadway and also acts as the eastern gateway to Wimbledon town centre, therefore redevelopment of exemplary design quality is a must. The ground floor should have an active frontage, respecting the dual aspect and corner site.
 - Public space would be welcomed.
 - Proposals should consider the amenity of neighbouring residential uses to the north of the site.
 - Servicing facilities should be provided on site to minimise impacts

- on traffic movement, congestion and road safety.
- Mitigating and managing the impacts of parking on neighbourhood and local amenity will need to be addressed.
- Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the critical drainage area.
- Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided.

7.3.7 Merton's Draft Local Plan 2020 (still at consultation stage) sets out the strategic planning framework for Merton for the next 15 years from adoption to 2035. The YMCA site is still identified as an allocated site, Wi15 (YMCA Wimbledon). The Councils proposed site allocation remains the same as the existing site allocation:

A suitable mix of retail (A1 Use Class), financial & professional services (A2 Use Class), restaurants & cafes (A3 Use Class), drinking establishments (A4 Use Class), offices (B1[a] Use Class), community (D1 Use Class) and residential (including Hostel or Hotel) (C3 & C1 Use Class).

7.3.8 The allocation highlights both issues and opportunities for redevelopment, these include:

Issues

- Proposals should consider the amenity of neighbouring residential uses to the north of the site.
- Servicing facilities should be provided on site to minimise impacts on traffic movement, congestion and road safety.
- Mitigating and managing the impacts of parking on neighbourhood and local amenity will need to be addressed.

Opportunities

- The site is a prominent corner site with an active frontage facing onto The Broadway and also acts as the eastern gateway to Wimbledon town centre. Therefore, redevelopment of exemplary design quality is a must.
- Opportunity to provide modern, well-designed hostel type accommodation and support services for vulnerable people in an accessible location

- This site is a corner site with an active frontage facing onto the Broadway so redevelopment of exemplary design would be welcomed. The ground floor should have an active frontage, respecting the dual aspect and corner site.
- Public space would also be welcomed

Commercial

7.3.9 The site is currently occupied by a mix of uses. The existing YMCA facility is an occupied 111-bed hostel facility for the homeless (*Sui Generis*), whilst Olympic House is a purpose built 1970s office building lawfully in Class B1(a) use, other than part of two floors which are leased to a D1 education provider. Tower Lodge is also used by the YMCA as ancillary office and meeting space associated with the main YMCA hostel building (*Sui Generis*).

Hostel (YMCA)

7.3.10 YMCA St Paul's Group are bringing the redevelopment of the site forward alongside Thornsett Wimbledon Ltd with the residential and commercial development required to both optimise the redevelopment potential of this brownfield, town centre site, but also ensure that the homeless hostel can be viably delivered. The re-provision of a hostel with ancillary gym and café are all in line with the adopted site allocation above. The inclusion of the hostel as part of the redevelopment of the site is particularly welcomed by officers given its important role in providing an invaluable function to the local area, accommodating vulnerable and homeless residents. The YMCA provides on-site support on a 24-hour basis and in addition to providing crucial accommodation for vulnerable residents, they also deliver a programme of activities and workshops alongside a personal development plan for each resident to ensure that they have enough support and assistance required.

Education/Office

7.3.11 The proposed would result in the loss office and education facilities on the application site which would be contrary to planning policies DM C1 (Community facilities) and DM E2 (Offices in town centres) of Merton's Sites and Policies Plan. However, it must be noted that the formal allocation of the application site in Merton's Sites and Policies Plan did not require a minimum re-provision of any of the existing uses on the site. Nevertheless the application does make direct provision for the potential use of the ground floor commercial units with a flexible use which includes both Class B1a (Office) or Class D1 (Non-residential institutions).

Office

7.3.12 As existing, Olympic House accommodates 1,124 sq.m. of office floorspace. The proposed development makes capacity to re-provide office floorspace through the provision of 333 sqm of flexible commercial floorspace within two units at ground floor level if required or desirable. However it should also be noted that the adjoining site, 188 – 194 The Broadway, which forms part of the site allocation (but not included within this application) has recently been granted planning permission for demolition of existing building and erection of seven storey office building (LBM Ref 18/P2918). This would include 1,420 sqm of office floor space. In the context of this approved application, noting that this site provides for office land use as stipulated within the site allocation and accordingly offsets the loss resulting from the proposals.

Education

7.3.13 The proposals will result in the loss of the existing education facility (562 sq.m.) used by the language school provided within Olympic House. The proposed development makes capacity to re-provide education facilities with Class D1(Non-residential institutions) through the provision of 333 sqm of flexible commercial floorspace within two units at ground floor level if required or desirable. There is however no guarantee that the units would be used for Class D1 purposes given the flexible uses proposed. In addition, other uses proposed could be considered better suited in this context which have a more interactive relationship with the proposed public square, however the market will likely dictate how the units could be used.

7.3.14 There could potentially be a loss of educational facilities on the application site. However there is no requirement to re-provide educational facilities on the site as part of the site allocation. Officers have limited information before them to indicate that there is a high demand/need and a lack of capacity for language school places in the Borough. There are at least 3 other language schools (Wimbledon School of English, Englishhouse - School of English and Summer School of English for Foreign Children), currently operating in the Wimbledon area which can meet need if required. The applicant also confirms that they have been in discussion with Love Wimbledon BID with a view to relocating the existing tenants (including the language school) elsewhere within the Town Centre should they so wish.

7.3.15 Officers consider that a balanced view must be taken on the merits of the proposed development. In this instance the loss of a language school facility would not outweigh the public benefits the scheme would deliver with an enhanced YMCA facility, new commercial units, much needed residential units and a vast improvement of the visual amenities of The

Broadway and Trinity Road street scenes, including a new public square. For the reasons above, it is considered that there is no objection to the loss of the existing uses on site.

Residential

- 7.3.16 The National Planning Policy Framework 2019 – Paragraph 59 states to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The proposed 135 residential flats are a key financial driver for the redevelopment of the site and its ability of creating a new YMCA hostel on the site. The provision of private housing, like the re-provision of the hostel is particularly welcomed by officers given the high need for all housing types in London.
- 7.3.17 The National Planning Policy Framework 2019 and London Plan policies 3.3 & 3.5 promote sustainable development that encourages the construction of additional dwellings at locations with good public transport accessibility.
- 7.3.18 Policy 3.3 of the London Plan 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.
- 7.3.19 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.
- 7.3.20 Merton’s overall housing target between 2011 and 2026 is 5,801 dwellings (Authority’s Monitoring Report Draft 2017/19, p12). The latest (draft) Monitoring report confirms:
- All the main housing targets have been met for 2017/18.
 - 665 additional new homes were built during the monitoring period, 254 above Merton’s target of 411 new homes per year (London Plan 2015).
 - 2013-18 provision: 2,686 net units (813 homes above target)
 - For all the home completions between 2004 and 2017, Merton always met the London Plan target apart from 2009/10. In total Merton has exceeded the target by over 2,000 homes since 2004.
- 7.3.21 While a robust five years supply has been achieved in Merton, the housing

need is increasing in London. The borough's Core Planning Strategy states that that it is expected that the delivery of new residential accommodation in the borough will be achieved in various ways including development in 'sustainable brownfield locations' and "ensuring that it is used efficiently" (supporting text to Policy CS9). Policy H1 of the emerging London Plan sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions. The application site is on brownfield land and is in a sustainable location adjacent to other existing residential properties.

7.3.22 Table 3.1 of the London Plan identifies that LBM has an annual housing target of 411 units, or 4,107 over the next ten years. However, this minimum target is set to increase significantly to 918 set out in the 'London Plan Examination in Public Panel Report Appendix: Panel Recommendations October 2019', and which is expected to be adopted. This significant increase will require a step change in housing delivery within the LBM.

7.3.23 The application seeks to create 135 residential units which will make a good contribution to meeting housing targets and would provide a mix of unit sizes that will assist in the delivery of a mixed and balanced community in a sustainable location. New housing is considered to be in accordance with the objectives of the NPPF, London Plan targets, and LBM policies.

7.4 **Design, visual amenity and heritage assets**

7.4.1 The National Planning Policy Framework sets out that achieving high quality places and buildings is fundamental to the planning and development process. It also leads to improvements in the quality of existing environments. It states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

7.4.2 The regional planning policy advice in relation to design is found in the London Plan (2016), in Policy 7.4 - Local Character and 7.6 - Architecture. These policies state that Local Authorities should seek to ensure that developments promote high quality inclusive design, enhance the public realm, and seek to ensure that development promotes world class architecture and design.

7.4.3 Planning policy DM D2 (Design considerations in all development) of Merton's Site and Policies Plan 2014 seeks to achieve high quality design and protection of amenity within the Borough. Proposals are required to relate positively and appropriately to the siting, rhythm, scale, density,

proportions, height, materials and massing of the surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area.

Future Wimbledon Supplementary Planning Document (SPD).

- 7.3.4 The Future Wimbledon Supplementary Planning Document (SPD) was adopted at full Council on 18th November 2020, therefore for this planning application weight can be given to this document. The document is guidance, however, the SPD is a material consideration in assessing planning applications and should be used to help shape proposals at the pre-application stage and to support the determination of planning applications in Wimbledon town centre.
- 7.3.5 The Future Wimbledon SPD helps to guide investment decisions and promote economic growth for the town centre; offering greater clarity to land owners and investors as well as the local community over the type, form and quality of development and public spaces the council would support for the town centre.
- 7.3.6 The document gives a good insight of how the Council seeks to create a long-term vision for the future of development in Wimbledon town centre well into the 2040's.
- 7.3.7 The document includes much guidance on matters relating to sustainably, design, public realm and urban greening. In regards to the YMCA site, the following extracts from the SPD are considered useful:
- The YMCA public space as part of the redevelopment will provide a new space for the local community and those using the building.
 - Towards the eastern end of The Broadway around the CIPD building and YMCA there are already a number of taller buildings of residential, office and community use. This area would also be appropriate for some increase in height, where the context allows. Proposals must demonstrate that they will not negatively impact surrounding character, residential amenity and rights of light etc.
 - Building guidance height - Up to 10 Storeys and up to 8 storeys on the end section of the site on the Trinity Road frontage.

Local Development framework Tall buildings background paper 2010

- 7.3.8 The Tall Buildings Background Paper forms part of Merton's Local Development Framework, as an evidence base in support of the Design Policy outlined in the Core Strategy. The following extracts are

considered relevant for the proposed development:

Paragraph 1.4.2

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. In the centres however, and in central London, this height may well be considered average, and have little presence in its surrounding environment. This highlights the importance of treating every site and every proposal for a tall building individually, and basing the assessment on its merits and context.

Paragraph 1.4.2

The Council is encouraging the redevelopment of key sites centrally located within the town centre. These sites include (but are not limited to) the Sir Cyril Black Car Park, Wimbledon Station, YMCA Site and Wimbledon Theatre Car Park, and others that will come forward over the life of the LDF. These key sites are generally located centrally in the town centre and therefore are amongst fairly large scale built form, and have the ability to enhance the retail, leisure, commercial and residential offer in Wimbledon Town Centre and build on the physical character of the Major Centre.

Paragraph 3.5.9.

Wimbledon Town Centre is the most significant location in the borough in terms of building height, with two distinct clusters of tall buildings to the east along The Broadway and to the west around St Georges Road. The Core Strategy is proposing to strengthen and enhance Wimbledon as a Major Centre, encouraging major development including office development. Additional tall buildings may assist in achieving this, and will provide the opportunity to consolidate and strengthen the town centre skyline.

Paragraph 3.8.6.

It is noted that the key clusters of tall building in the borough are located in Wimbledon and Colliers Wood centres, where existing development assists in framing the views across an otherwise low rise suburban borough. It is suggested that tall

buildings could be used to contribute to these existing clusters and add to the precedent, so as to enhance the status of the centres and protect low rise areas of the borough from inappropriate development. New tall buildings will be expected to be of an exceptional design quality that will facilitate improvements to other existing large scale buildings in these centres, and overall reinforce and enhance the built form quality in the borough. This approach is consistent with the general policy direction for Wimbledon and Colliers Wood in the Core Strategy.

Paragraph 4.2.17.

There are two distinct clusters of mid-rise and high-rise buildings in the town centre, located at the western end around St Georges Road, and along the linear eastern end of The Broadway. These existing tall buildings in Wimbledon are primarily for commercial/office based uses.

Paragraph 4.2.18.

The linear structure of the eastern Broadway end of the town centre has allowed for an emerging taller building rhythm and scale east of Wimbledon Theatre. Some buildings at this location reach heights of between 6 and 8 storeys, including the recent redevelopment of Broadway House, and the existing YMCA Building. There are however a number of low-rise buildings at this end of The Broadway that will face development pressure over the life of the LDF in line with neighbouring sites.

Paragraph 4.2.26.

Based on the analysis within this detailed area study, tall buildings may be appropriate where of exceptional design and architectural quality and where justified in terms of their impact on the townscape and historic environment, and the benefits towards regeneration and public realm.

Paragraph 4.2.27.

In Wimbledon Town Centre, tall buildings should contribute to creating a consistent scale of development based on a range of similar but not uniform building heights. These should be determined by reference to surrounding building heights and townscape characteristics.

Paragraph 4.7.2.

Tall buildings of exceptional design and architectural quality may therefore be appropriate in the town centres of Colliers Wood, Morden and Wimbledon where justified in terms of their impact on the townscape and the historic environment, and the benefits towards regeneration and the public realm.

Paragraph 4.7.5.

In Wimbledon Town Centre, tall buildings should contribute to creating a consistent scale of development based on a range of similar but not uniform building heights. These should be determined by reference to surrounding building heights and townscape characteristics. Regard will need to be given to the Conservation Areas and the setting of Listed Buildings within and adjoining the centre where an individual design approach will be required to ensure that large scale development respects the historic character of these areas. Other locations that may be sensitive to tall buildings include those areas near to the edge of the town centre boundary due to the close proximity of low scale high quality residential development, and those locations where tall buildings may impact on the Wimbledon Hill ridgeline, including long range views into the borough from Richmond Park.

Design and Review Panel

7.4.9 The redevelopment of the site had been subject of three submissions to DRP, May 2018, July 2019 and November 2019.

May 2018 – Verdict: Amber

(Replacement of existing hostel and office buildings with a new hostel, and new residential accommodation in building up to 13 storeys in height, including rear amenity space and ancillary facilities.)

- Schemes in early stages of design, with indicative facades and floor plans.
- The DRP supported the scheme in principle subject to further design development.
- Merton council officers supportive of 13 storey scheme in principle subject to high quality architecture.
- Concerns about the height.
- Concerns about the public space use and daylight due to location at the rear of the proposal.
- Concerns about the YMCA element not standing out within the development.

July 2019 – Verdict: Red

(Demolition of existing buildings and replacement with new YMCA hostel, new public spaces and 15 storey residential building.)

- Support for design changes to public space and splitting the building in 3 blocks.
- Support for the emerging architectural treatment in the YMCA building.
- Support for uses in ground floor.
- Objection about materiality, form, bulk, height and detailing of the Tower element.
- Concerns about the quality of the front public space use and daylight in the back public space of the proposal.

November 2019 – Verdict: Amber

(Demolition of existing buildings and replacement with new YMCA hostel, new public space and 9 storey private residential building)

- Support for the proposed massing and heights.
- Support for the architectural style.
- Support for the public space provision to the front of The Broadway.
- Support for the residential layouts and the introduction of a courtyard to increase the number of dual aspects.
- Support for the organic soffit overhang inspired in Wimbledon nature.
- Further refinements are needed in the design of The Broadway elevation to make the 3 blocks more different and also decide the rationale on the use of curve.
- Further refinements are needed in the design of Trinity Road elevation to make it less overbearing to the street.
- Concern about ground floor units directly facing Trinity Road.
- Concern about light in YMCA corridors, long corridors in the gym.
- Concern about the quality of some of the residential apartments.

Current application

7.4.10 In response to comments by the DRP at the November meeting, the applicant has made the following changes:

- Changes to the architecture of the 3 block elements facing The Broadway to differentiate them;

- Introduction of a curved corner to the residential block facing the proposed public space to mirror the curve of the YMCA block and add coherence to the blocks' relationship and proposed public space architectural treatment. Curved corners to both the YMCA block and residential block facing the proposed public space will enhance the flow of people towards the piazza.
- Development of curved corner to Trinity Road and The Broadway junction to make it more expressive and different to the other two curved corners. This acts as a gateway landmark and breaks the linearity of the taller residential block façade facing Trinity Road.
- Trinity Road residential block's façade set back from DRP proposals to increase width of footpath and avoid appearing overbearing to the residential block opposite.
- Residential top floors set back to reduce massing and height onto Trinity Road and make it a transitional element between South Park Road low-rise and The Broadway mid-rise. The set back top floors will have a lighter treatment as well so the façade feels well balanced in relation to Trinity Road.
- Residential top floor has been set back to reduce massing and height onto The Broadway. The top floor set back will have a lighter treatment as well so the façade feels well balanced in relation to The Broadway.
- Change all ground floor units facing Trinity Road to Duplex units with individual entrances from the street. This will keep the residential character of Trinity Road but will improve the quality of the units.
- All YMCA corridors now have a window to provide natural light. The gym has been rationalized so there is only one central corridor instead of the previous long L corridor. Gym studios will have rooflights and natural light from the gym's courtyard.
- Residential apartments' quality improved through detailed design. Concerns about excessive depth of the central block dual aspect flats amended by reducing the depth from 13.5m to 12m and increasing the width.

- Further development with the introduction of set-backs and greenery to the back façade of the YMCA to minimise the impact and improve South Park Road properties' outlook.
- Further refinements in the architectural treatment to improve the design quality of the elevations.
- Collaboration with local artist Fiona Grady (appointed through a public competition) to create 2d patterns inspired by YMCA's ethos and Wimbledon's history to add further refinement and detail to facades.
- Servicing of the development is now from the internal courtyard and off the public highway.
- High quality landscape detailed design

Demolition

7.4.11 The existing buildings on the site have little architectural merit and are in a somewhat rundown condition. The public feedback from the Councils recent Wimbledon Master Plan indicates that the existing buildings are disliked. Officers consider the existing building on site to be dated and in a rundown condition. Therefore the demolition is welcomed, with no objection to their demolition subject to a suitable replacement.

Layout

7.4.12 A welcomed feature of the site layout is the setback siting of the buildings with the double height colonnade and new public square at front. The existing buildings on the site are set back into the site. However, large planters in front of the buildings prevent ease of movement, create a poor environment due to the bleak condition of the planters and a lack of acknowledgment if this is public or private space. At present, the end plot of the application site is a hoarded site at which point the footpath at the junction between The Broadway and Trinity Road is reduced in width. This creates a pedestrian pinch point at this busy junction. The proposed double height colonnade will be set back from the site boundary by between 1.4m and 3.9m (approx) and will be free from street furniture and planters (other than in the proposed new public square). This will create an unobstructed footpath for the benefit of public use in front of the buildings along The Broadway and partly along Trinity Road. The double height colonnade which includes attractive design features will have the benefit at street level of giving the building a more domestic scale and providing a sense of openness/breathing space from the higher floors above.

7.4.13 The new public square at the front of the site will be setback 15.4m (approx) into the site which will create a good size space and welcoming environment for all. The space will be further enhanced by a high quality landscaping scheme (details to be secured via planning condition). The new public square will create a high quality setting for the new YMCA facility and an interactive environment for the commercial ground floor uses. The redevelopment of the site has the potential of creating a positive change to the character of this section of The Broadway with exceptional designed new buildings and public spaces.

7.4.14 The overall layout and form of the buildings has been subject of much design evolution by the applicant prior to submission of the full planning application. The application site has many constraints due to the proximity of neighbouring residential properties and the desirability of providing a public space as part of the development of the site (as set out in the site allocation). The applicant has worked with officers, DRP and the general public to now be in a position where the layout of the development responds positively to the constraints and opportunities of the site. It is acknowledged that the proposed height and mass of the buildings would be an uplift beyond the current situation, however through the use of the good site layout and design features such as the double height colonnades, increased width footpaths, a south facing front public square and active ground floor commercial uses will create a considerably more positive setting at street level for pedestrians than the current situation.

Balconies

7.4.15 In response to officer's comments at pre-application stage regarding potential visual clutter detracting from the design quality of the building as a result of residents adding screening and or storing equipment on balconies, the applicant has responded by choosing flattened uprights for the balconies balustrade. The design choice is considered to add interest to the design of the building and has the advantage of that in a flat elevation you would read the balustrade as a component of single objects that lets the light penetrate, but from any other angle the repetition of this geometry, creates a compact surface. This provides the relevant privacy to the residents and partly obscuring views of equipment that may be stored on the balconies.

Height/Massing

7.4.16 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,

and the Councils recent Wimbledon Master Plan consultation.

7.4.17 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'.

7.4.18 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'.

7.4.19 The LBM Tall Buildings paper states that "Based on the analysis within this detailed area study, tall buildings may be appropriate where of exceptional design and architectural quality and where justified in terms of their impact on the townscape and historic environment, and the benefits towards regeneration and public realm".

7.4.20 Officers acknowledge that the proposed height and mass of the proposed buildings would be an uplift beyond the current situation. The height of the proposed buildings would range between a part single, part five, part 6, part 7, part 8 and part 9 storey building. The largest element, block B (residential block on corner of The Broadway and Trinity Road) would be a total of 9 floors, with the top floor set back. The main elevation would be 26.2m in height and 29.2m to the top of the setback top floor. The applicant has confirmed that there is no requirement for additional plant at roof level as this is provided within the basement area.

7.4.21 The height of the development has been raised by objectors, however the planning assessment of the development must take into consideration number of factors including relevant policy, existing site context, quality of design and what benefits a dense development can deliver.

Policy

7.4.22 At the heart of all planning policy is a requirement to maximize the potential of sites. This is particularly relevant in London where there is growing pressure to provide more housing. More housing needs to be delivered and creating more dense developments in town centre locations (where existing denser development already exist) will take some pressure off more domestic environments for taller buildings.

7.4.23 The application site is identified as an allocated site in the Local Plan and both the Future Wimbledon SPD and Tall Building Paper identify the site as being potentially capable of delivering taller buildings. The Wimbledon Master Plan has identified the site as being able to accommodate

buildings up to 10 storeys (8 storeys at rear part of the site along Trinity Road). It is noted that the Future Wimbledon Master Plan is not an adopted document and is only guidance, however the proposed scheme would be within the height guidance of both The Broadway and Trinity Road street frontages. In fact the proposed buildings would be at least one storey lower than the max and at least 2 storeys lower at the rear section of the site along the Trinity Road.

7.4.24 The Future Wimbledon Master Plan identifies design guidelines for the YMCA that any redevelopment should aim to achieve. As set out within this committee report, the proposed development is considered to fully meet these design guidelines.

Design guidelines for the YMCA:

- A new public space on the YMCA site as part of the redevelopment of that site.
- A space that provides an asset and usable space for the local community and those using the new building.
- A space that is integral to the building design and is of appropriate shape and size to create a positive setting for the building.
- A space and building design that works as a landmark feature to mark the transition away from the Broadway Corner area towards the main town centre.
- A landscape design that uses high quality materials and landscaping inspired by the local context.
- A building design that fits in with the Wimbledon DNA in terms of materials and mid-rise urban form.

Context

7.4.25 The application site located within the boundary of Wimbledon Town Centre. The site is therefore considered to be a dense urban environment. The application site fronts onto two streets, The Broadway and Trinity Road. Each street scene differ in character with The Broadway being a hub for larger buildings fronting onto the main thoroughfare through the town centre and Trinity Road being more domestic in scale away from The Broadway.

Existing Buildings

7.4.26 The height, massing and condition of the existing buildings on the site set a good benchmark for redevelopment of the site which should seek to maximize the potential of the site. The taller elements of the existing buildings on the site range between 6 and 7/8 storeys. The current YMCA

building stands at 7 storeys plus roof plant (19.7m (22.6m plant)). The form of the building is considered to be poorly detailed and somewhat of a slab that creates a blot on the landscape. The overall appearance of the site is considered to be a current negative feature within the street scenes. Therefore the redevelopment of the site is therefore welcomed and long overdue.

The Broadway

7.4.27 This section of The Broadway is already considered to have an established character of larger and taller buildings. This includes the application site, as stated above. Other taller buildings within vicinity of the application create a denser urban environment, these include:

Note commercial internal floor heights are generally higher than residential.

- 188 – 194 The Broadway - Permission for a 7 storey office building (23.125m high).
- 153 – 161 The Broadway (Primer Inn) - A 8 storey hotel (27.025m in height (28.826m with plant)).
- 165 The Broadway - A 8 storey commercial building.
- 143 – 151 The Broadway (CIPD) – A 5 storey office building.
- 150 The Broadway (Communication Workers Union) - A 5 storey commercial building with high floor to ceiling heights.
- 120 The Broadway - A 7 storey commercial/residential building at the junction of The Broadway and Stanley Road.

7.4.28 The proposed building heights are similar to existing building heights in the vicinity of The Broadway street scene and would not be significantly more bulkier or taller within this context to cause harm to the visual amenities of the area. The staggered building height within the development itself, recessed top floors, double height colonnades and splitting the building into three different blocks will significantly help reduce the massing and height of the buildings from street level. The new public square, double height colonnades and wider pedestrian footway will all assist in providing some breathing space at street level. Due to the design of the recessed top floors and the width of The Broadway itself, at street level the top floors would not be clearly noticeable. Hence at street level the height would be viewed more like 7/8 storeys. It's only from longer views in the street that the top floors would be noticeable. When travelling from an eastern direction along The Broadway, the increased bulk, height and curved corner element of the design will create a well designed and high quality landmark gateway building to the Town Centre from the east.

7.4.29 For the reasons stated above, it is considered that the proposed increase

in bulk and height would sit appropriately within the established building heights along this section of The Broadway (5 – 9 storeys). The proposal would be at the upper end of the building heights and bulk, however this would be in line with planning policy and the tall building paper that seeks to contribute to creating a consistent scale of development based on a range of similar but not uniform building heights.

Trinity Road

7.4.30 The Trinity Road section of the proposal has been designed to respond to the more domestic scale and residential nature of this road. Whilst residential buildings further to the north of the application site are two storey housing, it should be noted buildings directly to the east of the application site include 3 and 5 storey blocks of flats. The character of this part of Trinity Road is therefore considered to be low to modest raised buildings.

7.4.31 The height of the building responds to the change in building heights and character of the Trinity Road street scene by lowering in height with a staggered building form. Lowering in height from the 8 floors, plus top floor corner element down to 4 floors, plus top floor. This staggered building height is an effective approach that makes a good transition from the larger element along the Broadway to the more domestic scaled buildings in Trinity Road and towards South Park Gardens. The further splitting up of the staggered selections with different shades of brickwork will help reduce the perceptive height and bulk of the building to a more domestic scale.

7.4.32 For the reasons stated above, it is considered that the proposed increase in bulk and height would sit appropriately within the established building heights along this section of Trinity Road (3 – 5 storeys). The proposal would be at the upper end of the building heights and bulk, however The proposed building heights are similar to existing building heights in the vicinity of Trinity Road and would not be significantly more bulkier or taller within this context to cause harm to the visual amenities of the area.

Design approach

7.4.33 The overall design approach and detailing is considered to be of a exceptional standard. As set out above, the form of the buildings has been spilt into three sections along The Broadway. The 3 buildings will have the same materials, share similar window rhythm, similar corner treatments and classical orders. Despite the similarities the 3 buildings will have different character:

Element 1 (YMCA) This building is dynamic and horizontal due to the movement between the windows positions in the upper floors. The application outlines that this would make use of a strong red brick as in Wimbledon DNA group 2 to stand out.

Element 2 (Residential) This building is a background building, set in between 2 urban strong buildings, the whole facade is a large balcony with thin profiles that make it very light and transparent.

Element 3 (Residential) Strong, vertical, gateway building to mark the junction of The Broadway with Trinity Road, in a creamy brick to not compete with the YMCA block.

7.4.34 The predominate use of brickwork is welcomed by officers as it will give the buildings a strong and long lasting high quality appearance that responds to Wimbledon's DNA. The use of colour in the proposed scheme is inspired in the tones and colours of Wimbledon. The residential blocks will have soft tone variations making the YMCA building stand out with its distinctive red colour. All these elements take their tonal colours from the surrounding context, which is predominantly a yellow stock with a warmer red tone used on the key historic buildings. The northern blocks are warmer tones to act as a transition to the existing. Neighbouring schemes are generally of brick with white framed timber windows and limited amounts of light stone detailing to courses and pediments. These white accents are used throughout the buildings in the window and balcony cills to add consistency to the scheme and reflect the local character.

7.4.35 An important element to the success of the design will be the finer details, such as the perforated metal panels, textured cast concrete, green bricks, flower and the organic shaped forms of the overhang soffits. The applicant has taken inspiration from a number of projects in the Wimbledon area, including Wellington House, Wimbledon Hill Road which has been well received by the public due to the quality of its detailing and character. The level of detailing and quality of materials proposed can be controlled via planning condition to ensure that the development delivers its expected standard. A separate design code condition relating to signage of the ground floor commercial units is also important to ensure that signage responds to the quality and detailing of the building.

7.4.36 As set out above, the proposed building heights are considered to maximize the potential of the site and respect the character of the two street scenes. In that assessment, consideration has been given to the design of the buildings and various design features which greatly assist in reducing the overall height and massing of the buildings. These include well-proportioned layers to the building (bottom, middle and top), with well-considered double height colonnades, affective use of differing materials

(and colors) and suitably recessed top floors. Splitting the design into three interlinking blocks with various horizontal/vertical banding proportions and a slight curve to the Trinity Road elevation create interest to the design and again helps reduce the perceived bulk and height. On balance, the proposed height is not considered to be excessive in the context of the site and its setting whereby it would cause adverse harm to the visual amenities of the area.

Public Benefits

7.4.37 The proposal would provide an enhanced YMCA facility, which includes not only valuable facilities for some of the most vulnerable people in society but also access to facilities for the wider public, increased public footpath, new public square with supporting commercial uses, a vast improvement to the visual amenities of the site with the creation of exceptional designed buildings and much needed new housing. The redevelopment of the site has achieved many of the redevelopment aspirations set by Merton Council. It must be noted that the provision of a new public square at the front of the site sets considerable challenges in optimizing the redevelopment potential of the site. Therefore increased massing and height is logical and can therefore be considered as maximising the potential of the site and the delivering many public benefits.

Impact upon heritage assets

7.4.38 Merton's Site and Policies Plan policy DMD4 (Managing Heritage Assets) seeks to conserve and where appropriate enhance Merton's heritage assets and distinctive character. The policy states that proposals affecting a heritage asset or its setting should conserve and enhance the significance of the asset as well as its surroundings.

7.4.39 The application site is south of the South Park Gardens Conservation Area. However South Park Road and the south side of Princes Road sit between the application site and the Conservation Area. Therefore there is a good level of separation between the application site and the Conservation Area. Whilst there would be an increase in both height and massing on the site, it is considered that the proposed buildings are not too excessive in height and massing and would be well distanced away from the Conservation Area to ensure that there would be no harm to its character or setting. It is therefore considered that the proposal would preserve the South Park Gardens Conservation Area.

Design Conclusion

7.4.40 The site is considered to be in a good location for taller and more dense

buildings that can maximise the potential for its redevelopment. For the reasons stated above, the overall design approach is therefore supported by officers.

7.5 **Safety**

- 7.5.1 A number of objections have been received from neighbours regarding concerns with safety with incidents from the use of the existing YMCA facilities.
- 7.5.2 In response to a range of comments received from the public and statutory comments received by the Metropolitan Police, the below sets out measures that will be incorporated into the scheme following a meeting by the applicant with the Met Police officer.
- 7.5.3 The security measures required to agree under the condition suggested by the MET are discussed in part below following a meeting with Officers. It is important to note final details will be secured by condition:
- (a) In order to address concerns regarding the 'back of house' links and use of the rear courtyard between the various uses, access to the rear courtyard will be limited and controlled via fob access to YMCA staff, commercial staff and residential occupants;
 - (b) The vehicular access to the rear courtyard via Trinity Road will be fob controlled;
 - (c) Fob controlled access will also be provided to the cycle store, bin store, communal storage areas and amenity spaces. The cycle storage inside the buildings will only be accessible to residents, with an appropriate locking system to ensure residents are not accidentally locked in;
 - (d) Fob controlled access will be installed to control access throughout residential blocks;
 - (e) Comments have been received that the wide overhang soffit may offer the chance for groups to loiter, or provide an area for rough sleepers. However this overhang is two storeys in height and the width is reduced to the central public space and along Trinity Road. The YMCA and the commercial uses will offer natural surveillance over this space alongside additional measures such as CCTV, whilst the YMCA actively discourage rough sleeping and work closely with LB Merton through a programme of measures should this arise;

(f) Mailbox provision will be provided in the entrance lobby to mitigate against any opportunities of theft;

(g) A concierge will be provided on-site for the residential building to assist with allowing access to trades people and monitoring access to different parts of the building.

(h) CCTV will be installed across the entire development and we expect details of this to be conditioned, with appropriate coverage to provide identity images of those who enter alongside activity images within these spaces;

(i) The enlarged cycle parking has been amended so it is within a lockable store. This is reflected in the revised ground floor plans;

(j) The short stay cycle spaces in Trinity Road have been relocated within the public realm at the front of the development to benefit from greater surveillance. This is reflected in the revised ground floor plans;

(k) The communal amenity roof terraces will have perimeter screens to prevent items being thrown, or people jumping / falling off. Any plant containers will be located and fixed appropriate to eliminate the chance to climb over balustrades or be thrown over balustrades. It is expected that a management strategy for communal roof terraces will be conditioned;

(l) The play spaces have been designed to be adjacent to living rooms of residential units to provide natural surveillance as required. Appropriate planting within the roof gardens will be maintained so they do not obstruct any vision within these spaces and do not compromise lighting or CCTV. We expect details of these measures to be conditioned;

(m) The public piazza will benefit from a combination of existing street lighting and proposed new bollard lighting. It is expected final details of the lighting scheme would be conditioned;

7.5.4 The applicant states that the new YMCA development has been designed and will be managed in a way that significantly improves safety at the site and seeks to minimise disturbance to neighbouring residents.

7.5.5 Natural surveillance from the hostel rooms and apartments above will be provided to the new piazza at the front of the building and the ground floor commercial uses will add to the surveillance over this space through active frontages and external seating. Following concerns being raised

during the consultation stage about noise and rubbish being thrown out of the existing YMCA windows, the design included windows that provide ventilation but do not allow objects to be thrown out.

- 7.5.6 In addition, the YMCA itself has been designed so that both the reception and the staff offices overlook the piazza and behavior can be monitored. YMCA managers will be available on site 24hrs a day and night, enabling them to spot and take action in the event of any problems in that area. Management and surveillance will be further backed up with modern CCTV systems.
- 7.5.7 The YMCA are also providing a managed smoking area for residents within the new hostel, at first floor level terrace area, which will reduce the incentive for residents to congregate at the front of the YMCA.
- 7.5.8 Concerns from neighbours relating to disturbance and safety have formed ongoing dialog with the applicant. The applicant has been in discussion with MET and neighbours to try and address concerns raised. The design of the proposed building and its management does seek to reduce impact where possible. Planning conditions relating to secure by design will need to be approved by the police before the building can be occupied. In reality there is no amount of good design or management that can totally guarantee that incidents will not occur, however the application submission and further details relating to safety can help reduce such events from taking place.

7.6 **Density**

- 7.6.1 Table 3.2 of the London Plan identifies appropriate density ranges based on a site's setting and PTAL rating.
- 7.6.2 The area has a public transport accessibility level (PTAL) of 6b (best), where 1 is poor and 6 is excellent. It is considered that the site is located within an Central area for the purposes of Table 3.2 of the London Plan, given the nature of surrounding built form and the criteria set out in the supporting text to Table 3.2 (density matrix) of the London Plan.
- 7.6.3 The proposed development would have a density of 1,287 habitable rooms per hectare. The proposed density is above the relevant density range of 650-1100 habitable rooms per hectare, as set out in Table 3.2 for the setting (Central) and PTAL 6.
- 7.6.4 In terms of the emerging London Plan, Policy D6 (Draft London plan Policy) sets out that:

“Development proposals must make the most efficient use of

land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1. the site context
2. its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3. the capacity of surrounding infrastructure”

7.6.5 The emerging London Plan does not include a density matrix as it does not necessarily provide a consistent means of comparing proposals.

7.6.6 Whilst density is a material consideration, it is not the overriding factor as to whether a development is acceptable; London Plan paragraph 3.28 states that it is not appropriate to apply the density range mechanically. The potential for additional residential development is better considered in the context of its bulk, scale, design, sustainability, the impact upon neighbouring amenity, living standards for prospective occupants and the desirability of protecting and enhancing the character of the area and the relationship with surrounding development.

7.6.7 The London Plan states that development at densities outside table 3.2 will still be considered, however require particularly clear demonstration of exceptional circumstances. In this instance, it is considered that the proposed design and provision of high quality hostel and residential accommodation is of a high enough standard to justify the higher density proposed in this high PTAL location.

7.7 **Housing mix**

7.7.1 Planning policy DM H2 (Housing Mix) of the Sites and policies Plan state that to create socially mixed communities, creating for all sectors of the community by providing a choice of housing with respect to dwelling size and type in the Borough. In assessing development proposal the Council will take account of Merton’s Housing Strategy (2011-2015) borough level indicative proportions of 33% (one bed), 32% (two bed) and 35% (three plus bed). The proposed mix is 1 x studio unit, 108 x 1-bed units, 25 x 2-bed units and 1 x 3-bed unit. The proposed development would have a housing mix as follows:

Housing Mix	Number	Percentage	Merton’s policy
1 bed (including Studios)	109	80.75%	33%
2 bed	25	18.5%	33%
3 bed	1	0.75%	33%

7.7.2 Policy DM H2 (Housing mix) and Draft Local Plan policy H4.3 (Housing Mix) both set out a preferred bed unit size mix of roughly 33% even split for 1, 2 and 3+ bed units. However this requirement must be applied having regard to a number of relevant factors including site circumstances, site location, identified local needs and economics of provision such as financial viability or other planning contributions.

7.7.3 The applicant has put forward Merton's Merton Strategic Housing Need Assessment (SHMA) data, market advice and viability arguments for the high level of one bedroom flats within the development. These are set out below:

Merton SHMA (2019)

7.7.4 The Merton SHMA (2019) sits within the evidence base for the new Local Plan and is helpful in establishing some context within which the proposal sits.

Prevalence of Larger Units in the Borough

- Pg 19 - over half of the existing homes in Merton / Wimbledon are 3b+ family units.
- Pg 25 - Wimbledon already has highest number of 3 bed + homes in Merton at 33%.
- P113 – the table shows Wimbledon already has 69% 3 bed+ houses compared to only 8% 1 bed homes among owner occupiers.

7.7.5 All of these emphasise the point raised above about how the Borough, and in particular Wimbledon, is well stocked in larger homes and there is ever increasing pressure to convert family sized housing with gardens, into smaller sub-divided flats. If this trend continues, then the larger family housing stock within the Borough will continue to be diminished.

7.7.6 Purpose built smaller accommodation relieves the pressure of these conversions and ensures that high quality housing is available for the 1-bed market.

Home Ownership and Affordability

- Pg 25 – ownership has decreased by 1.5% in Merton due to worsening affordability and declining access to mortgages, above the London average of a 1% decrease.
- Pg 49 - affordability is already a problem in Wimbledon with median house prices at £850,000 and mean house prices at £1.3m. 'It is

the size of the properties that make Wimbledon expensive to live in’;

- Pg 52 – the table demonstrates prices for houses as considerably higher than prices for flats.
- Pg 70 - affordability is a problem in much of Merton, especially Wimbledon ‘...one of the highest across all the comparators’

7.7.7 Home ownership across the Borough is decreasing, principally due to prices increasing and much of the market of younger, first time buyers have been priced out of Wimbledon. The SHMA supports this case and notes that the prevalence of larger houses in Wimbledon / Merton are a barrier to younger buyers.

7.7.8 This proposal provides purpose built smaller accommodation which will be targeted at younger, first time buyers who are looking to buy in Wimbledon – and benefit from all its services, daytime and evening economy and excellent public transport – but are currently unable to afford to do so.

Market for Younger Buyers

- P61 - in the Wimbledon submarket, Estate Agents noted the most popular age bracket for buyers is between 25-40 years old (some said 30-40 years).

7.7.9 This reiterates that there is demand and interest amongst younger buyers in this market, but they are seeking smaller, more affordable homes in an area dominated by larger, unaffordable 3 bed+ houses.

Market Advice

7.7.10 The applicant has included specialist market advice from a local residential expert (JLL) to understand likely values and demands arising from a scheme in this location. JLL state that their experience demonstrates that there are several factors influencing the type of purchaser within a new build block of flats including:

- Access to transport
- Access to other amenities (shops / restaurants etc)
- Traffic/noise in the micro location
- Provision of local freehold family housing
- Access to green space
- Provision of parking within the development
- Price point

7.7.11 JLL have found that the more you have of the top four features, the more geared demand will be to younger buyers and therefore smaller units.

Young professionals with no dependants are more likely to be looking for good transport into the centre of London both for work and leisure, they also desire to be closer to hustle and bustle for similar reasons and this is a more important factor than say green space which features highly on the list of requirements for second steppers.

7.7.12 Second steppers, who are looking for two and three bed apartments to be able to expand their family into, also want to be further from the noise and pollution that traffic brings to provide a better environment for young children and therefore we find that blocks of flats on A roads are far more popular for those without dependants.

7.7.13 Another issue JLL have outlined is, where there is good availability of local freehold housing stock with gardens, this detracts from sales of larger units. Their letter references seeing this most strongly at Ram Quarter (4km to the north of the application site), where buyers of larger units would generally tend to purchase in the Tonsleys – a nearby Victorian estate. It is also worth highlighting buyers of larger apartments have a higher demand for parking.

7.7.14 It is clear from the advice received therefore that there will be high demand for the 1-beds within this scheme due to the access to public transport and local services, whilst there is going to be less demand for larger units due to the noise and traffic generated in the immediate vicinity and the provision of larger housing in the locality. This advice underpins the decisions taken in the scheme to provide a range of different sized 1-bed units so that whilst there is a high percentage of small units, there is a variety of accommodation offered within the scheme for the target market. The Council's Planning Policy Officer has concurred with some of the arguments put forward by the applicant for the housing mix and have raised no objection. The scheme is also car-free (other than disabled parking) which further lends itself towards smaller households rather than families.

Viability

7.7.15 The Applicant's cost consultant has concluded that there would be a cost saving if two one bedroom flats were converted into a 2 bedroom flat of these situations of around £21,500, based on a range of measures associated with the reduced cost of fitting the unit out (i.e. one kitchen rather than two etc).

7.7.16 JLL have also provided an indication of the values of 1 and 2 bedroom flats. The 2 x 1-beds have previously been valued at £404,000 and £407,000 respectively giving them a total value of £811,000. If these two apartments were converted into 1 x 2-bed apartment, then JLL have

valued this unit at £732,000.

- 7.7.17 There would thus be a decrease in value of £79,000 against a cost saving of £21,500 meaning that in each of these instances, such an amendment would take £57,500 out of the value of the scheme.
- 7.7.18 It is clear from this exercise, coupled with the viability assessment, that the scheme is therefore unable to alter the mix that is proposed within the same building footprint. In order to achieve a mix which would increase the number of 2-beds and reduce the number of 1-beds, a taller, denser scheme would be necessary. However this is an area that the Applicant has worked extensively to avoid through pre-application engagement given the level of local opposition and comments received by key stakeholders including the Design Review Panel.
- 7.7.19 The Councils Future Merton Team has assessed the planning arguments put forward by the applicant and taking account the individual circumstances of this proposal, it is considered on balance that the justification for the proposed housing mix in this case is justified. The site is in an area of high PTAL accessibility making it appropriate for flatted housing development. Wimbledon has a high existing prevalence of family sized accommodation compared to the rest of the borough. Hence the proposal contributes to providing greater choice in housing size mix in Wimbledon.
- 7.7.20 The points made in regards to altering the layout of the scheme under the current footprint of the building on viability grounds seems logical and acceptable to this particular case. Viability has already been tested and it has been agreed that there would be a deficit in viability terms and therefore the scheme cannot support any affordable housing. Therefore any changes to the mix, with more 2 bedroom flats will result in making the current scheme even more unviable. Officers consider that the proposal does maximize the potential of the application site as required by planning policy and NPPF and any further increases in height and mass may not be considered acceptable. For this reason, officers consider that it is undesirable to seek changes under this building design and to the housing mix despite the high number of 1 bedroom flats, which can also be justified in other terms relating to need and appropriateness to the location of the site in the town centre with its excellent access to transport and amenities.

7.8 **Neighbour Amenity**

- 7.8.1 London Plan policies 7.6 and 7.7, CS policy 14, and SPP policy DM D2 seek to ensure new developments do 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.

Material Considerations

- 7.8.2 Material planning considerations in this instance which should be considered include the condition of the existing buildings, the town centre location, site allocation within the local plan and the recent appeal decision (23rd Jan 2020) on the adjoining site (188 - 194 The Broadway, LBM ref 18/P2918).

Existing Buildings

- 7.8.3 The existing buildings on the site are not only in a poor and rundown condition, their original design does little to help and reduce their somewhat slab appearance. The existing buildings are therefore not only considered to be a negative impact on the street scene but also have a bleak and uninspiring impact on surrounding residential properties. Whilst the proposed redevelopment of the site would result in larger buildings, this doesn't always result in a poorer situation for neighbours in terms of the visual impact of a development. If new buildings are designed with good quality and include features to help reduce height and massing, then these can be seen as positive changes. The existing buildings are such poor quality that they fail on all fronts that the redevelopment of the site is welcomed.

Town Centre Location

- 7.8.4 The application site is located within the boundaries of Wimbledon Town Centre. The town centre is an identified area in the Borough where growth (including larger buildings) are directed and are to be expected. The town centre is a location where existing larger buildings already exist, will be directed in the future and have the benefit of excellent public transport links. The Town Centre is a growth area which is reflected in the Council's tall building paper and recent Future Wimbledon Master Plan which seeks to provide guidance on building height.

Site Allocation

- 7.8.5 The application site has a site allocation for redevelopment in the Local Plan since at least 2014. Its allocation sets a clear message to the public that the site is suitable for redevelopment and is likely to come forward for redevelopment. The existing buildings on the site are already large in

scale and any redevelopment would not be able to justify a reduction in floorspace or built form if the site is to deliver its maximum potential as required by NPPF and planning policy.

Appeal Decision

- 7.8.6 The recent appeal decision on the adjoining site, (188 - 194 The Broadway, LBM ref 18/P2918) is a strong material planning consideration. This is due to the appeal site forming part of the site allocation in the local plan, its recent decision date (23rd Jan 2020) and why the planning inspector allowed the appeal following objections raised by officers in regards to neighbouring amenity. The full appeal decision can be found in **Appendix 2.0** of this committee report for full reference. The following extracts from the appeal decision give officers a clear indication how the Planning Inspectorate are taking a view on urban development. The following extracts must therefore be taken into account:

‘The effect of the development on the outlook from the windows serving the stairwell would not be harmful to the living conditions of the occupiers of No. 180 as they serve a non-habitable room. The window of the living/dining room does not face directly onto the flank wall so it would not be visible from deeper in the room. However, the flank wall would be clearly visible from close to the window. As this window serves a habitable room and has a view over the garden it is likely that the occupiers of No. 180 would wish to enjoy the view from it. The height, depth and resultant massing of the flank wall of the proposed development would result in its being oppressive and harmful to the outlook from that window.

The window to the attic bedroom is a dormer with restricted access. Nevertheless, the photographs received from the Council on 13 February 2019 submitted by the appellant indicate that this window is openable and the positioning of a desk and keyboard in front of it suggest that the occupiers of No. 180 may spend some time within the dormer close to the window. The height, depth and resultant massing of the flank wall of the proposed development would thus also be harmful to the outlook from this window.

The proposed development would extend along the boundary of the garden for approximately half its length and, from the evidence before me, would be approximately 21.2 m high. It would therefore present a very substantial bulk of flank wall immediately adjacent to the garden for a significant proportion of its overall length. Although there would be a more open area to the end of the garden and it would be possible to face away from the flank wall, there would be no escaping its presence as it would be immediately obvious when

entering the garden from the flat. The entrance to No. 180 is located in the north elevation and the flank wall would dominate this entrance.

Occupiers of Viscount Point, the residential apartment complex opposite the site on the south side of The Broadway, are concerned about the potential loss of light, privacy and views resulting from the proposed development. I note the dissatisfaction with aspects of the Daylight and Sunlight Report expressed by some third parties. However, no evidence has been provided to me that disputes the calculations in the Daylight and Sunlight Report and the reduction in daylight for some of the occupiers of Viscount Point does not form part of the Council's reasons for refusal. Nevertheless, it is my view that these reductions in daylight and consequent effect on the living conditions of the occupiers of these properties weigh against the proposed development.

With the exception of No. 188 The Broadway, the application site forms part of Site Proposal 62 (Wimbledon YMCA) as defined in the SPP. Site Proposal 62 is an allocation for a range of mixed uses, including offices. However, the policy simply establishes the principle of the redevelopment of the site; it does not set any parameters for that redevelopment in terms of built form.

The Future Wimbledon Masterplan (FWM) indicates that the appeal site would be appropriate for a building up to 7 storeys high. From the evidence before me the FWM is a Supplementary Planning Document that has been subject to one round of public consultation but has yet to be adopted. Furthermore, it is only guidance and does not form part of the development plan. I therefore give it only limited weight.

Accordingly, I conclude that the proposed development would be harmful to the living conditions of the occupiers of No. 180 due to being overbearing as a consequence of its height, depth and resultant massing and proximity to both the windows to habitable rooms in the rear elevation and to the rear garden of that property. It would also cause limited harm to the living conditions of some of the occupiers of properties in Viscount Place due to a partial loss of daylight. The proposed development would be contrary in this respect to clause a) v of Policy DM D2 of the SPP which, amongst other things, protects the quality of living conditions of the occupiers of adjoining buildings and gardens.

...the proposed development would be contrary in this respect to clause f) of paragraph 127 of the National Planning Policy

Framework (the Framework), which requires planning decisions to ensure that developments create places that have a high standard of amenity for existing users.

The National Planning Policy Framework (the Framework) also supports economic growth and productivity and the vitality of town centres, with significant development focused on sustainable locations in terms of access and making effective use of land. The development would help achieve the economic, social and environmental objectives for the planning system as set out in paragraph 8 of the Framework.

Planning Balance

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan is the starting point for decision making. I have found conflict with the development plan in respect of the harmful effect upon the living conditions of the occupiers of neighbouring properties as set out in the conclusion on that main issue.

However, in the particular circumstances of this case, the majority of the site lies within a site allocated for redevelopment in the SPP and its height would conform with the emerging FWM. In that context, both the adopted and emerging development plan emphasise the delivery of new office development within Wimbledon Town Centre. The proposed development would provide significant employment opportunities in a highly accessible location which are benefits of the proposal to which I afford considerable weight.

When having regard to the above, on balance, the compliance of the proposed development with other policies of the adopted and emerging development plan, and the extent of the benefits of the proposal that I have identified which constitute material considerations, together outweigh the harm to the living conditions of the occupiers of neighbouring properties and the conflict with the associated policy of the development plan in that respect.'

- 7.8.7 The appeal decision sets a clear message that whilst there were some identified impacts on the amenities of existing neighbours, the applications site context, policies/guidance and benefits of the scheme would outweigh the harm to the living conditions of the occupiers of neighbouring properties. This is particularly relevant to the application site where identified impacts relating to sun and day light have been documented and justified in the applicants Sun and Daylight report.

Use of Roof Terraces

- 7.8.9 The proposed development includes the use of a number of flat roof areas for both private and communal amenity areas. The proposed amenity areas are well distanced away from neighbouring residential properties to ensure that there would be no adverse impact from noise and disturbance. The proposed roof top terrace areas have been designed to be inset from the edge of the building to help mitigate overlooking and loss of privacy. A planning condition preventing the use of other flats roof areas (not identified on the drawings) can ensure that there would be no adverse impact on neighbours. A planning condition requiring full details of the proposed plant or side screen to the first floor YMCA terrace is considered necessary in order to ensure that there is no overlooking or loss of privacy from this terrace area.

Overlooking

- 7.8.10 The design of the building and its layout ensures that windows and doors either are directed towards the flanks of the proposed building, or are well distanced away from neighbouring residential gardens/properties, or directed towards public areas or where there are reduced separation distanced (such as the YMCA element adjacent to properties on South Park Gardens) some of the rear windows will be obscured glazed. A planning condition requiring the windows to be obscured glazed in perpetuity can ensure that there would be no undue loss of amenity.

Sun and Daylight

- 7.8.11 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).”

- 7.8.12 The applicant has submitted an independent sun, daylight and overshadowing report produced by Robinsons Surveyors Limited.

Robinsons Surveyors Limited are Chartered Surveyors and Specialist Modellers, with decades of experience in DLSL modelling on many of the most complicated and large scale projects in Central London, Greater London and beyond. Robinsons specialise in Daylight and Sunlight based modelling and analysis.

7.8.13 Robinsons state that they have taken a robust approach using surveyed models and have clearly identified shortfalls in terms of daylight and sunlight impacts by reference to all available tests in the BRE Guide. The report highlights, in detail, areas that comply with the strict aspirations of the BRE Guide. The BRE Guide aspirations are drafted to suit both suburban and urban environments. The BRE Guide suggests the use of alternative targets in 'dense urban environments' (i.e. the Broadway). Whilst the majority of the accompanying analysis shows compliance with the strictest aspirations of the BRE Guide, for reasons detailed in the report, more challenging areas are considered supportable when assessed in the context of the local environment.

Right of Light Consultants

7.8.14 In response to the comment/objection received from Right of Light Consultants on behalf of residents in South Park Road (no's 26, 30, 32, 55, 59, 61, 63, 69, 71, 73, 75 and 77) and 7 Trinity Road, the applicant's sun and daylight specialist has provided a direct response to the objections raised. See section 5.1.5 for points raised by Right of Light Consultants.

Applicant's response

'The BRE Guide provides aspirations for daylight and sunlight. These aspirations are designed for use in low density (suburban) environments together with some urban environments.

The BRE Guide states:

"The advice given here is not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances the developer or Planning Authority may wish to use different target values. For example, in an historic city centre a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings".

Within our report, submitted with the planning application, we have referenced shortfalls against the strict aspirations of the BRE Guide - providing analysis to define them in detail. As the Proposed Development is not located in a suburban setting, indeed LB Merton identify Wimbledon as their only Major Town Centre, we have followed BRE Guide recommendations and have considered this analysis against alternative targets and precedents.

Whilst referenced within the ROLC letter, sensitivity analysis is commonly only used on larger planning applications as part of an Environmental Statement. Accordingly, LB Merton confirmed in a response to an EIA Screening Opinion that a full Environmental Impact Assessment / Statement was not required in this instance. Therefore we prepared a stand-alone report and the criterion mentioned in the ROLC letter is not required.

At Robinsons, we always strive to use the most robust survey and modelling skillsets and techniques when undertaking daylight and sunlight analysis. Our report (and analysis) is based upon site inspections and planning records including those obtained during a site visit to view L.B. Merton's hard copy planning records.

As detailed within our report and drawings our modelling of the properties in question is based upon survey data - a laser scanned model. This is then located within a wider photogrammetric model. Where planning records were not available for neighbouring property layouts, these have been based upon reasonable assumptions in accordance with conventional practices. Our model is therefore robust and ROLC are able to confidently comment upon our detailed findings, as presented.

As can be seen from our previous daylight and sunlight report, with the exception 73 - 77 South Park Road and Flat 2 and 19 Nairn Court, all of the daylight and sunlight impacts to these properties are fully compliant with the strictest aspirations of the BRE Guide.

Whilst there are derogations to 73 - 77 South Park Road these only affect a modest number of windows/rooms, with all others being fully compliant with the strict BRE Guide aspirations for daylight and sunlight. Where shortfalls occur, the windows/rooms are considered against the 'alternative target' approach suggested within the BRE Guide. When compared to alternative targets it can be seen that there are no shortfalls in the majority of cases and where there are shortfalls these are modest and supportable for reasons stated.

In terms of flats 2 and 19 Nairn Court, Flat 19 is believed to be a second floor flat, whereas flat 2 is located at ground floor level; both are located in the same block. As can be seen from our report, the daylight analysis shows the flat 19 is fully compliant with the strict BRE Guide aspirations for suburban locations. In terms of sunlight there is full compliance with the exception of a single modest 1% winter shortfall (against an aspirational target of 5%) to the living room window (W1). This is because this window is single aspect and faces just 14 degrees from outside 90 degrees of due south. Windows outside 90 degrees of due south do not need to be analysed under the BRE Guide as they are not capable of viewing the sun path owing to orientation. As it stands, this window can only see 15% of the total sun path and therefore the poor design of this building is a limiting factor requiring due consideration. With a reduction of 20% this is deemed acceptable in this location and is above other, existing context, winter sunlight levels locally. This is therefore fully supportable.

Whilst flat 2 does suffer a 3 - 5% shortfall against the strict VSC aspirations, this is partly because the individual apertures are analysed as separate windows. The VSC in the proposed context, for all 4 windows, is over 20% which is significantly above the mid-teen target for dense urban and environments quoted in the report and this represents a very good level of daylight which exceeds existing VSC levels to this building in the existing/pre-development context. Also, the daylight within the room (DD) is fully supportable against the BRE Guides strict aspirations. Whilst there are modest sunlight (APSH) shortfalls of 1% against individual windows to this aperture (W1) where all windows to the aperture are accounted for the cumulative impact fully complies with the strictest aspirations of the BRE Guide'.

Overshadowing

7.8.15 The applicants sun and day light report confirms that all amenity areas will benefit from 2 hours of sun following completion of the proposed development during the day (on 21 March). The proposed development therefore complies with the test laid down within the BRE guide.

2 & 2A Trinity Road

7.8.16 Located directly to the north of the application site. The building is currently used as the Conservative Club which is a non-residential use. The proposed development would therefore have no undue impact upon this neighbouring property in terms of both visual impact and sun and day light.

5 Trinity Road (Oadtrin Lodge)

- 7.8.17 This neighbouring building is a part 3, part 4, part 5 storey block of flats located on the east side of Trinity Road, to the east of the application site. It has to be noted that currently the end section of the application plot has no buildings. This has been the situation for a number of years. Therefore the current situation creates a very good level of outlook towards the application site from these neighbouring properties, which is unusual in a dense urban town centre environment.
- 7.8.18 These neighbouring block of flats sit predominately opposite (east) the 9 storey element (Block B) of the proposed new buildings. However, it should be noted that the building does reduce in height to 5 storeys further north along Trinity Road. In addition, the design of the building includes a number of design features that will help reduce its perceived height and massing, these include a lightweight setback top floor, slight elevation curve to Block B facing Trinity Road and the vertical subdivision of each block including changes in brick colour. Taken collectively these design features will help reduced the perceived height, bulk and massing of the development when viewed from these neighbouring flats. It also has to be noted that the proposed design is considered to be exceptional, a vast improvement on poor appearance and condition of the existing flank elevation of the YMCA building and a public highway (Trinity Road) provides a physical barrier and a reasonable level of separation between the two sites. On balance, the proposed is not considered to result adverse visual intrusion from these neighbouring flats within this town centre location.
- 7.8.19 The applicant's sun and daylight report identifies that the proposal would result in shortfalls in BRE guidance to some windows. However it must be noted that the BRE is only guidance. It is:

"...not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances the developer or Planning Authority may wish to use different target values."

Technical justifications have been provided within the applicant's sun and daylight report that justify why some shortfalls and alternative targets can be considered acceptable in this dense urban context and against other planning considerations.

7.8.20 On balance, it is noted that there would be an uplift in the massing and height of the development and its relationship with these neighbouring properties. The uplift is considered to be in line with the height and massing of existing buildings along The Broadway and this section of Trinity Road. In regards to assessing all material consideration in the planning balance of the scheme, weight must be given to the condition and appearance of existing buildings, application sites location in the town centre, site allocation, recent appeal decision and what benefits the scheme will deliver. When having regard to the above, on balance, the compliance of the proposed development with policies of the adopted and emerging development plan, and the extent of the benefits of the proposals identified which constitute material considerations, together are considered to outweigh the impact to the living conditions of the occupiers of these neighbouring properties.

7 Trinity Road (Nairn Court)

7.8.21 This neighbouring building is a series of interconnecting 3 storey block of flats located on the east side of Trinity Road, to the east of the application site.

7.8.22 These neighbouring block of flats would sit predominately opposite the 5 Block E) and 6 (Block D) storey elements of the proposed buildings. The design of the building does however include a number of design features to help reduce height and massing, these include a lightweight setback top floor and the vertical subdivision of each block including changes on brick colour. Blocks E and D are also more domestic in scale, responding to the scale of the existing blocks of flats on Trinity Road. The combination of the height and massing of the building and its design features that help reduce its presence would ensure that there is no undue loss of amenity. It also has to be noted that the proposed design is considered to be exceptional and a public highway (Trinity Road) provides a physical barrier and reasonable level of separation between the two sites. On balance, the proposed is not considered to result adverse visual intrusion from these neighbouring flats within this town centre location.

7.8.23 The applicant's sun and daylight report identifies that the proposal would result in shortfalls in BRE guidance to some windows. However it must be noted that the BRE is only guidance. It is:

"...not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances the developer or Planning Authority may wish to use different target values."

Technical justifications have been provided within the applicant's sun and daylight report that justify why some shortfalls and alternative targets can be considered acceptable in this dense urban context and against other planning considerations.

- 7.8.24 On balance, it is noted that there would be an uplift in the massing and height of the development and its relationship with these neighbouring properties. The uplift is considered to be in line with the height and massing of existing buildings along this section of Trinity Road. When having regard to the above, on balance, the proposal is not considered to cause harm to these neighbouring properties.

9 & 11 Trinity Road

- 7.8.25 This pair of semi-detached residential properties is located on the east side of Trinity Road, to the northeast of the application site. The proposed development is well distanced away to ensure that there would be no undue loss of outlook or visual intrusion. The applicant's sun and daylight report confirms that the proposal would meet BRE guidance.

32 South Park Road

- 7.8.26 This residential property is located on the north side of South Park Road, to the north of the application site. The proposed development is well distanced away to ensure that there would be no undue loss of outlook or visual intrusion. The applicant's sun and daylight report confirms that the proposal would meet BRE guidance.

59 – 71 South Park Road

- 7.8.27 These semi-detached residential properties are located on the south side of South Park Road, to the north of the application site. The majority of these neighbouring properties (59 – 65 South Park Road) would sit to the northwest of the application site. Therefore direct outlook to the rear of these neighbouring properties and gardens would not be adversely affected.

- 7.8.28 67 & 69 South Park Road would be located directly to the rear of the YMCA's proposed single storey addition with heat pump chillers above. Whilst being located close to the rear boundary of the application site, this part of the proposed development is single storey only. Planters are proposed on the edge of the single storey flat roof. These will be used as part of an extensive soft landscaping scheme on the rear elevation. They will help screen the proposed chillers and soften the appearance of the building. These neighbours have good sized rear gardens that will also

would offer some protection from the proposed building and chiller area. It is therefore considered that there would be no undue loss of amenity. A planning condition relating to full details of landscaping, screening and restriction on noise levels from the chillers can ensure that there would be no undue loss of amenity.

- 7.8.29 71 South Park Road would be located directly to the rear of the YMCA single storey addition (as above) and partly to the rear of the southern wing of the 8 storey YMCA building. In terms of the impact of the single storey element of the YMCA building, the same consideration set out above for 67 & 69 are relevant. The rear elevation of the YMCA building include two wings, these wings have been designed with a staggered form, stepping away from the rear boundary. This includes two floor setbacks above ground floor level and a singular setback at the top floor. The first/second, third floor, fifth floor and seventh floors of the staggered rear wings would be set approx. 5m, 7m, 13m and 15m respectively from the rear site boundary. The principle of staggered rear elevations has been used affectively in town centre development (including the appeal decision on adjacent site, 188 – 194 The Broadway which included a sloping rear elevation (rather than setbacks), where sensitive relationships with existing residential properties exist. This approach will considerably help reduce the overall massing of the building when viewed from this neighbouring property.
- 7.8.30 As set out above, soft landscaping planters will be extensively used to help soften the appearance of the rear elevation. Full details of soft landscaping will be conditioned to ensure that the soft landscaping is high quality and affective. Rear windows are proposed on the wings, however these will be obscure glazed to prevent overlooking and loss of privacy. A planning condition requiring them to be kept obscure glazed in perpetuity will ensure that there is no undue loss of amenity.
- 7.8.31 The proposal includes a small courtyard area to the rear of the YMCA gym. The outside space would be located on the rear boundary and thus adjacent to the rear garden of this neighbour (and partly to number 73). Whilst the amenity space is modest in size, it is considered that this space could cause adverse harm byway of noise disturbance from both persons using the space and from noise within the units as a result of open doors or windows. This is particularly relevant for a gym and studios where heavy equipment is used and music often played in such environments. Therefore a planning condition is required preventing the use of this outdoor area and doors/windows are to remain shut.
- 7.8.32 For 59 – 71 South Park Road the applicant's sun and daylight report confirms that the proposal would meet BRE guidance.

73 & 75 South Park Road

7.8.33 These semi-detached residential properties is located on the south side of South Park Road, to the north of the application site. They would be located directly to the north of the main 8 storey element of the YMCA building.

7.8.34 In terms of the impact of the single storey element of the YMCA building, the same consideration set out above for 67, 69 and 71 South Park Road are relevant. The rear elevation of the YMCA building include two wings, these wings have been designed with a staggered form, stepping away from the rear boundary. This includes two floor setbacks above ground floor level and a singular setback at the top floor. The first/second, third floor, fifth floor and seventh floors of the staggered rear wings would be set approx. 5m, 7m, 13m and 15m respectively from the rear site boundary. This approach will considerably help reduce the overall massing of the building when viewed from this neighbouring property. The 8 storey middle section of the YMCA building between the two rear wings is set 24m (approx.) back into the site from the north boundary and therefore well distanced away from the neighbours property and rear garden. As set out in the report above, a proposed rear terrace area for the YMCA is proposed on the flat roof area, however this is well distanced away from the rear boundary and behind a proposed generator so there would be no undue impact from noise, overlooking or loss of privacy.

7.8.35 As set out above, soft landscaping planters will be extensively used to help soften the appearance of the rear elevation. Full details of soft landscaping will be conditioned to ensure that the soft landscaping is high quality and affective. Rear windows are proposed on the wings, however these will be obscure glazed to prevent overlooking and loss of privacy. A planning condition requiring them to be kept obscure glazed in perpetuity will ensure that there is no undue loss of amenity

7.8.36 The applicant's sun and daylight report identifies that the proposal would result in shortfalls in BRE guidance to some windows. However it must be noted that the BRE is only guidance. It is:

"...not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances the developer or Planning Authority may wish to use different target values."

Technical justifications have been provided within the applicant's sun and daylight report that justify why some shortfalls and alternative targets can

be considered acceptable in this dense urban context.

7.8.37 On balance, it is noted that there would be an uplift in the massing and height of the development and its relationship with these neighbouring properties. The uplift has been carefully considered with a staggered rear building form and appropriate levels of setbacks and design features to help reduce visual impact. When having regard to the above, and the benefits of the scheme, on balance, the compliance of the proposed development with policies of the adopted and emerging development plan, and the extent of the benefits of the proposals identified which constitute material considerations, together are considered to outweigh the impact to the living conditions of the occupiers of these neighbouring properties.

77 South Park Road

7.8.38 This residential property is divided into flats and is located on the south side of South Park Road, to the north of the application site. These flats would be located directly to the rear of the eastern wing of the YMCA building and Block A and E within the residential element of the scheme. The rear service yard would sit between the proposed buildings and these neighbours rear outdoor space (which currently accommodates single storey garages).

7.8.39 As set out above, these neighbours have the benefit of being separated from the proposed buildings by a rear service yard. This creates a good level of separation and a physical barrier. In addition, the open space area to the rear of these flats has a number of single storey garages, is a location for bins and doesn't appear to be an amenity area or well used amenity area for the residents. Outlook from the ground floor windows in some of the flats are already affected by the single storey garages within close proximity. A number of trees on this neighbours land also sit along the boundary with the application site which provides some screening. The height, mass and design of the existing YMCA building would also need to be taken into consideration as it does create a somewhat bleak environment when viewed from this site (noted existing trees do screen some views from this neighbouring building). In light of the above, it is considered that there would be no adverse visual intrusion from these neighbouring properties.

7.8.40 The applicant's sun and daylight report identifies that the proposal would result in shortfalls in BRE guidance to some windows. However, it must be noted that the BRE is only guidance. It is:

"...not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should

be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances the developer or Planning Authority may wish to use different target values.”

Technical justifications have been provided within the applicant’s sun and daylight report that justify why some shortfalls and alternative targets can be considered acceptable in this dense urban context.

7.8.41 On balance, it is noted that there would be an uplift in the massing and height of the development and its relationship with these neighbouring properties. The uplift has been carefully considered with a staggered rear building form, appropriate setbacks and design features to help reduce visual impact, including the provision of the rear service yard. In regards to assessing all material considerations in the planning balance of the scheme, the proposal is considered to be acceptable in its relationship to these neighbouring properties.

168 - 186 The Broadway

7.8.40 These properties are located on the north side of The Broadway, to the west of the applicant site. They comprise commercial units at ground floor and some residential above. The proposed development is well distanced away to ensure that there would be no undue loss of outlook or visual intrusion. The applicant’s sun and daylight report confirms that the proposal would meet BRE guidance.

188 - 194 The Broadway

7.8.41 These properties are located to the north side of The Broadway, to the west of the application site. They comprise commercial units and a residential unit at the upper level. This property has recently received full planning permission for a 7 storey office building (allowed on appeal) and has a pending planning application for an additional floor. Given an application has been submitted for an additional floor it is considered highly likely that the site will be redeveloped in the near future. There would be no loss of amenity if the office development is built as this is a non-residential use. If the site is not redeveloped as expected then this neighbouring site includes commercial and a residential unit on the upper floors. There would be no loss of amenity to the commercial units given their non-residential status. In terms of impact on the rear windows of the residential unit, these are at the upper levels and would maintain some views over the single storey YMCA element directly to the rear of this neighbouring property. Whilst there would be a large flank wall of the YMCA along the boundary with this neighbour, the planning inspector’s conclusion on this matter (large flank wall along the boundary with 180 The Broadway) has already been established with the appeal decision on

this neighbouring site. The proposal would be a similar situation (not as dominant) to that already deemed acceptable by the planning inspector, thus this situation is considered acceptable.

199 The Broadway (Viscount Point) and 201 - 203 The Broadway

7.8.42 This neighbouring building is a part 5, part 6 storey block of flats located on the south side of The Broadway, to the south of the application site. These neighbouring block of flats would sit predominately opposite the proposed 8 storey YMCA and residential Block A elements of the building design. The design of the building includes a number of design features that will help reduce its perceived height and massing, these include a lightweight setback top floor, horizontal banding, subdivision of the building into three blocks, setting back of the building from the pavement, new public square and double height colonnades. Taken collectively these design features will create a vast improvement to the visual amenities of the street scene and will help reduce the perceived height, bulk and massing of the development when viewed from these neighbouring flats. It also has to be noted that the proposed design is considered to be exceptional, a vast improvement on poor appearance and condition of Olympic House/YMCA building and a public highway (The Broadway) provides a physical barrier and reasonable level of separation between the two sites. The proposed is not considered to result adverse visual intrusion from these neighbouring flats within this town centre location.

7.8.43 The applicant's sun and daylight report identifies that the proposal would result in shortfalls in BRE guidance to some windows. However it must be noted that the BRE is only guidance. It is:

"...not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances the developer or Planning Authority may wish to use different target values."

Technical justifications have been provided within the applicant's sun and daylight report that justify why some shortfalls and alternative targets can be considered acceptable in this dense urban context.

7.8.44 On balance, it is noted that the would be an uplift in the massing and height of the development and its relationship with these neighbouring properties. In regards to assessing all material consideration in the planning balance of the scheme, weight must be given to condition/appearance of the existing buildings, application sites location in the town centre, site allocation, recent appeal decision and what benefits

the scheme will deliver. When having regard to the above, on balance, the compliance of the proposed development with policies of the adopted and emerging development plan, and the extent of the benefits of the proposals identified which constitute material considerations, together are considered to outweigh the impact to the living conditions of the occupiers of neighbouring properties

1A Montague Road (Carrington House)

- 7.8.45 This neighbouring building is a part 4, part 5 storey building with commercial at ground floor and residential flats above located south of the application site at the junction between The Broadway and Montague Road.
- 7.8.46 These neighbouring block of flats would sit predominately opposite the 9 storey corner residential Block B. The design of Block B includes a number of design features that will help reduce its perceived height and massing, these include a lightweight setback top floor, horizontal banding, setting back of the building from the pavement, new public square and double height colonnades. Taken collectively these design features will create a vast improvement to the visual amenities of the street scene and help reduce the perceived height, bulk and massing of the development when viewed from these neighbouring flats. It also has to be noted that the proposed design is considered to be exceptional, a vast improvement on poor appearance and condition of the YMCA building and a public highway (The Broadway) provides a physical barrier and reasonable level of separation between the two sites. On balance, the proposed is not considered to result adverse visual intrusion from these neighbouring flats within this town centre location.
- 7.8.47 The applicant's sun and daylight report identifies that the proposal would result in shortfalls in BRE guidance to some windows. However, it must be noted that the BRE is only guidance. It is:
- "...not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design. In special circumstances the developer or Planning Authority may wish to use different target values."*
- Technical justifications have been provided within the applicant's sun and daylight report that justify why some shortfalls and alternative targets can be considered acceptable in this dense urban context.
- 7.8.48 On balance, it is noted that the would be an uplift in the massing and

height of the development and its relationship with these neighbouring properties. In regards to assessing all material consideration in the planning balance of the scheme, weight must be given to condition/appearance of the existing buildings, application sites location in the town centre, site allocation, recent appeal decision and what benefits the scheme will deliver. When having regard to the above, on balance, the compliance of the proposed development with policies of the adopted and emerging development plan, and the extent of the benefits of the proposals identified which constitute material considerations, together are considered to outweigh the impact to the living conditions of the occupiers of neighbouring properties.

2A Montague Road (Montway Heights)

7.8.49 This neighbouring building is a part 3, part 5 storey building with commercial at ground floor and residential flats above located southeast of the application site on the junction between The Broadway and Montague Road.

7.8.50 These neighbouring block of flats has been designed with an angled corner feature directed towards the application site. Other than this element, all other windows face away from the application site. This corner feature will be directed towards the 9 storey corner residential Block B. This would be across the junction and would be at a suitable distance from a town centre location. Whilst the proposal will result in an uplift in built form and would be clearly visible from these neighbouring windows, it is not considered to be harmful to their outlook. The proposed is not considered to result adverse visual intrusion from these neighbouring flats within this town centre location.

7.8.51 The applicant's sun and daylight report confirms that the proposal would meet BRE guidance.

1 - 9 Keble Court

7.8.52 This multi-storey block of flats is located on the north side of South Park Road, to the north of the application site. The proposed development is well distanced away to ensure that there would be no undue visual intrusion. The applicant's sun and daylight report confirms that the proposal would meet BRE guidance.

7.9 **Standard of Residential Accommodation**

7.9.1 London Plan policies 3.5, 3.6, 3.7 & 3.8, CS policy CS 14, and SPP policies DM D1 and DM D2 seek to ensure that new residential development is of a high standard of design both internally and externally

and provides accommodation capable of adaptation for an ageing population and for those with disabilities, whilst offering a mix of unit size reflective of local need.

- 7.9.2 Planning policy CS 14 (Design) of Merton’s Core planning Strategy seeks to encourage well designed housing in the Borough by ensuring that all residential development complies with the most appropriate minimum space standards. The most up-to-date standards are the housing standards, minor alterations to the London Plan (March 2016).
- 7.9.3 In terms of the quality of the accommodation proposed, it is considered that the proposed flats would provide a satisfactory standard of accommodation for future occupiers. The proposed flats would exceed/meet minimum London Plan Gross Internal Area, room size and amenity space standards. Each habitable room would receive suitable light levels and adequate outlook. Given the shape of the site, some of the rooms have an unconventional layout, however each unit would meet minimum space standards.
- 7.9.4 The scheme has been designed so that there are no north facing single aspect units. The only north facing facade becomes a deck access, which provides dual aspect to the three units per floor in the core that it serves. A large courtyard in the centre of the building and a smaller one at the northern end of the site have been introduced to allow more dual aspect units in the design and improve the approach to the apartments. The number of dual aspects is as follows:

Dual Aspect	64%
Single Aspect	36%
North facing single aspect	0%

- 7.9.5 In relation to the proposed residential units:

Proposed GIA standards:

Flat No.	Level	Type	Proposed GIA (sqm)	Required GIA (sqm)	Propsoed Amenity Space (sqm)	Required Amenity Space (sqm)	Compliant
1	G	2B/4P	90	70	15	7	Yes
2	G	1B1P	46	39	7	7	Yes
3	G&1 st	3B6P	110	103	15 + 7	9	Yes
4	G&1 st	2B4P	91	79	7 + 7	7	Yes
5	G&1 st	2B3P	86	70	7 + 6	6	Yes
6	G&1 st	2B3P	82	70	7 + 6	6	Yes
7	G&1 st	2B4P	86	79	8 + 7	7	Yes

8	1 st	1B1P	46	39	5	5	Yes
9	1 st	1B1P	40	39	5	5	Yes
10	1 st	1B1P	47	39	6	5	Yes
11	1 st	1B2P	65	50	6	5	Yes
12	1 st	1B1P	47	39	5	5	Yes
13	1 st	1B1P	41	39	5	5	Yes
14	1 st	1B1P	39	39	5	5	Yes
15	1 st	1B2P	50	50	5	5	Yes
16	1 st	2B4P	71	70	7	7	Yes
17	1 st	1B2P	50	50	5	5	Yes
18	1 st	1B1P	44	39	5	5	Yes
19	1 st	1B1P	43	39	5	5	Yes
20	1 st	1B1P	43	49	6	5	Yes
21	1 st	1B1P	43	39	6	5	Yes
22	2 nd	1B1P	46	39	5	5	Yes
23	2 nd	1B1P	42	39	5	5	Yes
24	2 nd	1B1P	47	39	6	5	Yes
25	2 nd	1B2P	65	50	6	5	Yes
26	2 nd	1B1P	47	39	5	5	Yes
27	2 nd	1B1P	41	39	5	5	Yes
28	2 nd	1B1P	48	39	6	5	Yes
29	2 nd	1B1P	56	39	5	5	Yes
30	2 nd	1B1P	43	39	5	5	Yes
31	2 nd	1B1P	42	39	5	5	Yes
32	2 nd	1B1P	40	39	8	5	Yes
33	2 nd	1B1P	40	39	5	5	Yes
34	2 nd	2B3P	61	61	9	6	Yes
35	2 nd	1B2P	50	50	5	5	Yes
36	2 nd	1B2P	50	50	5	5	Yes
37	2 nd	Studio	55	39	6	5	Yes
38	2 nd	1B1P	49	39	11	5	Yes
39	2 nd	1B2P	51	50	6	5	Yes
40	2 nd	1B2P	51	50	6	5	Yes
41	2 nd	1B2P	51	50	6	5	Yes
42	3 rd	1B1P	46	39	5	5	Yes
43	3 rd	1B1P	42	39	5	5	Yes
44	3 rd	2B3P	65	61	6 + 4	6	Yes
45	3 rd	2B3P	63	61	6 + 12	6	Yes
46	3 rd	1B1P	47	39	5	5	Yes
47	3 rd	1B1P	41	39	5	5	Yes
48	3 rd	2B3P	66	61	6 + 4	6	Yes
49	3 rd	1B2P	51	50	5 + 10	5	Yes

50	3 rd	1B1P	43	39	5	5	Yes
51	3 rd	1B1P	42	39	5	5	Yes
52	3 rd	1B1P	40	39	8	5	Yes
53	3 rd	1B1P	40	39	5	5	Yes
54	3 rd	2B3P	61	61	9	6	Yes
55	3 rd	1B2P	50	50	5	5	Yes
56	3 rd	1B2P	50	50	5	5	Yes
57	3 rd	1B2P	59	50	6 + 11	5	Yes
58	3 rd	1B2P	50	50	11	5	Yes
59	3 rd	1B2P	51	50	6	5	Yes
60	3 rd	1B2P	51	50	6	5	Yes
61	3 rd	1B2P	51	50	6	5	Yes
62	4 th	1B1P	47	39	6	5	Yes
63	4 th	1B1P	42	39	5	5	Yes
64	4 th	2B3P	65	61	6	6	Yes
65	4 th	2B3P	63	61	6	6	Yes
66	4 th	1B1P	44	39	8	5	Yes
67	4 th	1B1P	41	39	5	5	Yes
68	4 th	2B3P	66	61	6	6	Yes
69	4 th	1B2P	51	50	5	5	Yes
70	4 th	1B1P	43	39	5	5	Yes
71	4 th	1B1P	42	39	5	5	Yes
72	4 th	1B1P	40	39	8	5	Yes
73	4 th	1B1P	40	39	5	5	Yes
74	4 th	2B3P	61	61	9	6	Yes
75	4 th	1B2P	50	50	5	5	Yes
76	4 th	1B2P	50	50	5	5	Yes
77	4 th	1B2P	59	50	6	5	Yes
78	4 th	1B2P	50	50	11	5	Yes
79	4 th	1B2P	51	50	6	5	Yes
80	4 th	1B2P	51	50	6	5	Yes
81	4 th	1B2P	51	50	6	5	Yes
82	5 th	1B1P	40	39	7 + 19	5	Yes
83	5 th	2B3P	65	61	6	6	Yes
84	5 th	2B3P	63	61	6	5	Yes
85	5 th	1B1P	39	39	8 + 21	5	Yes
86	5 th	2B3P	65	61	6	6	Yes
87	5 th	1B2P	51	50	5	5	Yes
88	5 th	1B1P	43	39	5	5	Yes
89	5 th	1B1P	42	39	5	5	Yes
90	5 th	1B1P	40	39	8	5	Yes
91	5 th	1B1P	40	40	5	5	Yes
92	5 th	2B3P	61	61	9	6	Yes

93	5 th	1B2P	50	50	5	5	Yes
94	5 th	1B2P	50	50	5	5	Yes
95	5 th	1B2P	59	50	6	5	Yes
96	5 th	1B2P	50	50	11	5	Yes
97	5 th	1B2P	51	50	6	5	Yes
98	5 th	1B2P	51	50	6	5	Yes
99	5 th	1B2P	51	50	6	5	Yes
100	6 th	2B4P	70	70	15 + 31	7	Yes
101	6 th	1B2P	50	50	12 + 25	5	Yes
102	6 th	1B2P	50	50	5	5	Yes
103	6 th	1B1P	42	39	5	5	Yes
104	6 th	1B1P	40	39	8	5	Yes
105	6 th	1B1P	40	39	5	5	Yes
106	6 th	2B3P	61	61	9	6	Yes
107	6 th	1B2P	50	50	5	5	Yes
108	6 th	1B2P	50	50	5	5	Yes
109	6 th	1B2P	58	50	6	5	Yes
110	6 th	1B2P	50	50	11	5	Yes
111	6 th	1B2P	51	50	6	5	Yes
112	6 th	1B2P	51	50	6	5	Yes
113	6 th	1B2P	51	50	6	5	Yes
114	7 th	2B4P	76	70	26	7	Yes
115	7 th	2B3P	61	61	8	6	Yes
116	7 th	1B1P	40	39	5	5	Yes
117	7 th	2B3P	61	61	9	5	Yes
118	7 th	1B2P	50	50	5	5	Yes
119	7 th	1B2P	50	50	5	5	Yes
120	7 th	1B1P	41	39	6	5	Yes
121	7 th	1B1P	50	39	11	5	Yes
122	7 th	1B2P	51	50	6	5	Yes
123	7 th	1B2P	51	50	6	5	Yes
124	7 th	1B2P	51	50	6	5	Yes
125	8 th	1B2P	51	50	8	5	Yes
126	8 th	1B1P	42	39	12	5	Yes
127	8 th	1B1P	38	37	12	5	Yes
128	8 th	2B3P	62	61	37	6	Yes
129	8 th	1B1P	42	39	19	5	Yes
130	8 th	1B1P	40	39	10	5	Yes
131	8 th	1B1P	41	39	7	5	Yes
132	8 th	1B1P	49	39	11	5	Yes
133	8 th	1B2P	50	50	6	5	Yes
134	8 th	1B2P	50	50	6	5	Yes

135	8 th	1B2P	50	50	6	5	Yes
-----	-----------------	------	----	----	---	---	-----

Private Amenity Space

7.9.6 The London Plan 2016 (London Housing Design Guide) states that all dwellings should provide a minimum of 5 sq m private outdoor space for 1-2 bedroom dwellings and an extra 1 sq m for each additional occupant. All new flats would have direct access to appropriate private amenity space in addition to an outdoor communal area at sixth floor levels.

Children's Play Space

7.9.7 The strategic planning policy requirement to provide for children's play space is set out at Policy 3.6 (Children and Young People's Play and Informal Recreation Facilities) of the London Plan 2016. This policy uses the Mayor's child yield calculator to determine what amount of play space is required.

7.9.8 Following the Stage 1 response from GLA, it has been anticipated that the proposals would generate a play space requirement of between 158 sq.m. and 222 sq.m. Following these comments from the GLA, the applicant has rerun their calculations and agree that the proposed mix would create a need for 158 sqm of play space, broken down as follows:

- 9 x 0-4 year olds requirement
- 6 x 5-11 year olds
- 1 x 12 – 15 year olds (including for rounding)

7.9.9 A total of 110 sqm is provided on-site at sixth floor level which will serve the youngest children of the development. This is in the form of built-in play space measures designed into the landscape including rubber play balls, balance beams and stepping logs as shown in the landscape drawings submitted with the application. As such, additional play space provision would be required. The application site would not be able to accommodate any additional play space provision given site constraints and other design aspirations being delivered as part of the proposals. The GLA state that evidence should be provided to demonstrate that the proposed off-site play provision fully satisfies the needs of the development whilst continuing to meet the needs to existing residents. Subject to addressing this requirement of the SPG, Merton Council should secure the off-site play provision of the 5-11 and 12+ age brackets (creation of new provision, improvements to existing play facilities and/or an appropriate financial contribution) within a legal agreement, accordance with the Policy S4, 3.16 and the Play and Informal Recreation SPG.

7.9.10 The applicant states that in respect of the older children, South Park Gardens is located 250 metres (2 minute walk) to the north of the site which provides a range of lawn spaces for older children (5+) to play within. Likewise and with greater provision for a variety of play spaces, Haydons Road Recreation Ground falls 450 metres (6 minute walk) to the east of the site, containing sports pitches and a dedicated play area in its south-eastern corner. There is thus both the provision of on-site play and high quality off-site play within close proximity of the site for children of all ages.

7.9.11 Further work is required to establish if existing play facilities in the area can be created, upgraded or if existing provision can accommodate the proposed increase in demand as a result of the proposed development. This matter will be resolved post committee decision and prior to Stage II consultation with the GLA.

Standard of hostel YMCA accommodation

7.9.12 The standard of accommodation for the new hostel is considered to be of high quality, with each bedroom containing en-suite facilities. Each floor would provide a shared kitchen facility and a large communal lounge and outdoor amenity area at first floor level. The size of the bedrooms and communal living spaces and layout has been customized specifically for the YMCA operation and officers raise no concerns with the standard of accommodation proposed in this regard.

Bin and Recycling Storage

7.9.13 The YMCA and residential elements of the scheme would have their own dedicated bin and recycling areas. The YMCA storage area would be 19smq in size. The residential storage areas would include a communal storage area (112smq in size) and the duplex flats facing Trinity Road will have their own bin stores in the front gardens. The applicants have outlined that the size and number of bins have been provided in line with that advised by the LB Merton Waste Officer at pre-application stage which was a capacity of 220L per residential unit. This equates to a total demand of 29,700L. In line with guidance from Merton, this is to be split 50/50 between household waste and recycling. The plans include 24no. 1280L, providing a total capacity of 15,360L for general household waste and 15,360L for recycling. In addition, there are five 240L food waste bins as requested by the waste officer. 5x1100L Eurobins are provided for the YMCA. Waste storage for the retail units will be provided within the unit and the size/volume of storage will be dependent upon the future occupier of the unit and their needs. It is further outlined that the YMCA will have a private waste and recycling collection undertaken 3 times a week.

7.9.14 Collection of refuse from the duplex flats would take place from Trinity Road. All other collections would take place on site from the rear service yard. The applicants have submitted vehicle tracking to show that a refuse vehicle can enter the site for servicing in the rear courtyard. The Council's Future Merton Waste Officer has confirmed that the 4m undercroft head height is of suitable height for a refuse vehicle to enter and exit the site. The Council's Future Merton Waste Officer raises no objection to the bin storage areas. Final details relating to bin storage can be controlled via planning condition seeking a Waste Management Collection Strategy.

7.10 **Flooding and Drainage**

7.10.1 The NPPF and London Plan policies 5.12, 5.13, Merton's policy CS 16 and SPP policies DMF1, DM F2 and DMD2 all seek to ensure that adequate flood risk reduction measures, mitigation, and emergency planning are in place to ensure there is no increase in flood risk offsite or to the proposed development.

7.10.2 The application site is located within flood zone 1, which is considered to be at low risk of flooding from pluvial sources, groundwater, artificial sources, and sewer surcharge. The applicant has submitted a Suds Drainage Statement with the application. It is proposed to restrict the peak surface water run-off rate from the development site to 2 l/s, providing 96% betterment on the existing surface water discharge rate for the 1 in 100 year return period. This is predominantly achieved through the use of an underground attenuation tank. Green roofs are also proposed which will provide amenity and biodiversity benefits and will reduce the overall volume of water discharging from the site in any given year.

7.10.3 The Council's Flood Officer and the Environment Agency have both confirmed no objection to the proposal subject to conditions.

8 **Transport and Parking**

8.1 Policy 6.1 of the London Plan (2016) 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.

8.2 At a local level Policy CS.19 of the Core Planning Strategy states that the Council will ensure that all major development demonstrates the public transport impact through transport assessments. Travel plans will also be required to accompany all major developments. Policy CS.18 promotes active transport and encourages design that provides attractive, safe, covered cycle storage, cycle parking and other facilities (such as showers, bike cages and lockers).

- 8.3 London Plan policies 6.3 and 6.12, CS policies CS20 and CS18 and SPP policy DM T2 seek to reduce congestion of road networks, reduce conflict between walking and cycling, and other modes of transport, to increase safety and to not adversely effect on street parking or traffic management.

Existing Situation

The Broadway

- 8.4 The Broadway is a two-way single carriageway road and forms part of the A219, which links the A24 in South Wimbledon with the A4 in Hammersmith. In the immediate vicinity of the site, The Broadway is approximately 9m wide and subject to a speed limit of 30mph. Footways and regular street lighting are present on either side of the carriageway with pedestrian crossing facilities present at key locations. The Broadway serves a range of commercial, retail and leisure facilities and offers access to numerous public transport, walking and cycling facilities in the vicinity of the site.
- 8.5 In immediate vicinity of the site, single-yellow lines restrict parking along either side of the carriageway from Monday to Saturday between 07:00 – 23:00 and Sunday between 14:00 – 18:00. No loading is permitted along this road section between Monday and Saturday from 07:00 – 10:00 and 16:00 – 19:00.
- 8.6 'Pay & Display' on-street parking bays are present along the northern side of the carriageway at the south-western edge of the site, which are operational between Monday – Saturday from 08:30 – 23:00 and Sundays from 14:00 – 16:00 and are restricted to a maximum stay of 2 hours. Outside of these hours, parking is free for 20 min and stays restricted to maximum of two hours. Double-yellow lines are present at junctions with minor roads, prohibiting parking at all times.

Trinity Road

- 8.7 Trinity Road is a two-way single carriageway that runs in a north-south alignment from Queen's Road to The Broadway. The road is subject to a speed limit of 20mph and serves mainly residential properties as well as the car park of the existing YMCA building and ancillary facilities. Speed humps and traffic calming features in the form of road narrowings are present in regular intervals to calm traffic within this residential area. In the immediate vicinity of the site, single-yellow lines are present on either side of the road that restrict parking from Monday to Saturday between 08:30 – 23:00 and Sunday between 14:00 – 18:00.

- 8.8 At its northern extent, Trinity Road adjoins Queen's Road via a staggered junction, with a Zebra crossing provided on the eastern approach of the junction. At its southern extent, Trinity Road forms the northern arm of a signalised junction with The Broadway and Montague Road.

Cycle parking

- 8.9 A total of 224 cycle parking spaces will be provided on-site. This will comprise the following:
- 188 residential cycle parking spaces located within a cycle store on the first floor of the development;
 - two spaces for enlarged cycles on the ground floor; and
 - 10 cycle parking spaces for the proposed YMCA development;
 - 24 short stay cycle spaces will be provided for visitors and will be located within the public realm at the front of the development.
- 8.10 It is noted that TFL have raised some concern relating to the attractiveness of the cycle parking design and layout, however the Council's Transport Planner has confirmed that the proposed cycle parking is in accordance with the London Plan. Officers therefore considered that there would be limited grounds to refuse planning permission when taking all other planning considerations and benefits the scheme would deliver into account.

Car parking

- 8.11 In accordance with the requirements of the London Plan, the development will be car free, with no general on-site car parking provision within the scheme. Residents of the site, with the exception of Blue Badge holders, would be prohibited from applying for on-street parking permits. A total of four parking spaces for disabled users will be provided within the site. These spaces will, if required, be leased to disabled residents who need on-site parking on first occupation. All parking spaces will be equipped with active provision for the charging of electric vehicles.
- 8.12 The proposal would result in the reduction of the car parking area currently on site. The proposal only includes 4 onsite car parking space and a service area. The proposal would therefore result in a considerable reduction in car travel to and from the site and there

Car Club Membership

- 8.13 The applicant has agreed to fund three years car club membership for new residents of the proposed development. The promotion of free car club membership will help inform new residents of sustainable modes of

travel which is welcomed. The three year free Car Club Membership can be secured within the S106 agreement.

Pedestrians

- 8.14 As the proposed development would only include 4 on site car parking spaces and would be a car free development, travel by foot will be a popular travel choice by residents and visitors. The proposal would improve the pedestrian experience along this section of The Broadway and Trinity Road with increase width footpaths and a new public square on The Broadway. The improvements in and around the site are welcomed.

Construction Vehicle Routing

- 8.15 Full details regarding the programming and phasing of the works will need to be provided upon appointment of a contractor to undertake the works. Details can be controlled via a suitable planning condition prior to works be undertaken.

Construction Logistics Plan

- 8.16 The submitted Construction Logistics Plan outlines the strategy for managing and monitoring the impacts of the construction of the proposed development on the site, neighbours and the surrounding highway network. A planning condition requiring full details of the CLP for each phase of development can be secured to ensure that impact on surrounding properties is kept to a minimum.

Servicing

- 8.17 Following lengthy discussion at pre-application stage, all servicing at the site will be undertaken from within the development and not from The Broadway or Trinity Road, part from several duplex flats. Tracking has been undertaken to demonstrate that the refuse vehicle can access and turn within the site to allow for egress in a forward gear.
- 8.18 Deliveries to the commercial units will also be undertaken from within the development. A dedicated LGV bay has been provided within the courtyard to allow deliveries to be undertaken without obstructing the remainder of users of the parking area. This bay will also accommodate LGV deliveries to the residential units.
- 8.19 For future safety and movement in close proximity to the signalised junction at Trinity Road the Council will look to introduce all day waiting and loading restrictions (24hr) on the Broadway and into Trinity Road via a section s106 contribution. This level of restriction has not been in the past

deemed necessary as the existing site has more extensive rear servicing and hence on-street demand for loading is low.

Trip movement

- 8.20 The number of person trips likely to be generated by the proposed development will be low and consequently the development proposals would not have a material impact on the operation of the public highway or public transport network.
- 8.21 The removal of the existing car park on the site will reduce vehicle trips to and from the development. The Transport Assessment determines the number of additional trips that would arise as a result of the additional units and the Councils Transport Planner concurs with its conclusions that the increase will be insignificant.

Travel Plan

- 8.22 The applicant has submitted a Travel Plan with the application, it sets out a range of measures and management strategies to support and encourage the use of the most sustainable forms of travel, walking and cycling, thereby facilitating low car ownership levels. The Travel Plan can be secured within the S106 agreement.
- 8.23 The GLA state that the Technical Note (TN) provided by the applicant following their original comments includes a Healthy Streets Check for Designers. The Healthy Streets check for designers should only be used where there are physical works to the public highway that are likely to cost in excess of £200k and should not be applied to the site as a whole. This is because the check for designers has to be audited by TfL to make sure it has been undertaken correctly and does not overestimate the scheme's Healthy Streets benefits. Further work has been undertaken in terms of assessing the quality of the key routes surrounding the sites and recommendations for improvements have been made. However, the TN states that the applicant is not proposing to deliver any of the pedestrian and cycle improvements identified. Given the improvements are all on borough roads it is for Merton to decide if a contribution towards these improvements are secured.
- 8.24 The redevelopment of the site would deliver a vast improvement to the pedestrian experience along The Broadway with setback buildings, a wider public footpath (including at the junction with Trinity Road) and a new public square at the front of the site. These changes are under the control of the application and are considered to be welcomed features that have been included as part of the overall design approach. As set out above, the viability of this scheme has been subject of lengthy discussions

with the Councils viability consultant. The conclusions of viability confirm that there is a deficit with bringing forward the scheme as it stands, therefore officers consider that it would be unrealistic at this late stage in the process to seek additional contributions from the applicant.

9 **Biodiversity**

9.1 Planning Policy DMO2 (Nature Conservation, Trees, hedges and landscape features) of Merton's Sites and Policies Plan seeks to protect and enhance biodiversity, particularly on sites of recognised nature conservation interest. To protect trees, hedges and other landscape features of amenity value and to secure suitable replacements in instances where their loss is justified

9.2 The applicant has provided an independent ecology report by Ecology by Design Ltd. The recommend the following:

- A single emergence bat survey should be undertaken of the tower block;
- Any dense vegetation removal should be completed outside the bird-nesting season (March to August inclusive) or preceded by a check for nests. If nests are found, they should be left undisturbed until the young have fledged;
- Recommendations for ecological enhancements.
- Should potential development not commence within 2 years of this report a resurvey is recommended due to the potential for the ecological interest of the site to change.

9.3 The recommendations of the ecological report include:

- The inclusion of a green/brown roof on the new development could significantly increase the sites value for biodiversity. Any green or brown roof should be designed in consultation with a green roof specialist following the principles of the GRO 'Green Roof Code'.
- Provision will be made for five integrated bird boxes. It is recommended that hollow bricks are used which are specifically designed for black redstart.
- Any planting plans for the site should include a wide variety of plants, with some native species where possible.
- Any recommendations within the subsequent bat report should also be followed.

9.4 Following the advice in the applicants ecology report, a detailed bat survey was also undertaken by Ecology by Design Ltd. The report states that no emerging bats were recorded coming from the tower block during the

survey. No bat activity was recorded at all across the site. The report recommends that that two Habitat boxes (or an equivalent) will be installed within the fabric of the walls of the new building on site. It should be installed on the southern aspect at c. 4m height, with unobstructed access and no direct illumination from external lighting.

- 9.5 A planning condition requiring evidence that the development has implemented the recommendations of the ecology and bat report would ensure that the site delivers enhanced biodiversity. Officers note the recommendations from the Swift Group in their consultation response and officers consider appropriate swift friendly bricks could be incorporated to the proposal, to be secured under the ecological condition.

10 **Contamination**

- 10.1 Merton's Sites and Policies Plan Policy DM EP4 (Pollutants) aims to reduce pollutants and reduce concentrations to levels that will have minimal adverse effects on people and the natural and physical environment.
- 10.2 The applicant has provided a Preliminary Investigation Report by Soils Limited. The Council's Environmental Health Officer has confirmed no objection subject to conditions.

11 **Sustainability**

- 11.1 Planning policy CS15 (climate Change) of Merton's adopted Core Planning Strategy (2011) seeks to tackle climate change, reduce pollution, develop low carbon economy, consume fewer resources and use them more effectively.
- 11.2 Planning Policy 5.2 of the London Plan (2016) states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
1. Be lean: use less energy
 2. Be clean: supply energy efficiently
 3. Be Green: use renewable energy
- 11.3 The applicant has submitted an updated Energy Statement. The Council's Climate Change Officer has confirmed that no objection subject to conditions and S106 agreement.
- 11.4 As the proposal is for a major residential development a S.106 agreement for the carbon offset cash in lieu contribution will need to be finalised prior to planning approval in line with Policy 5.2 of the London Plan. The

applicant has updated their energy strategy and calculation in discussion with the GLA. The final details and carbon off-set figure will be agreed at Stage II referral with the GLA. The contribution can then be secured within the S106 agreement.

12 **Air Quality**

12.1 Planning Policy DM EP4 of Merton's Adopted Sites and Policies plan (2104) seeks to minimise pollutants and to reduce concentrations to levels that have minimal adverse effects on people, the natural and physical environment in Merton. The policy states that to minimise pollutants, development:

a) Should be designed to mitigate against its impact on air, land, light, noise and water both during the construction process and lifetime of the completed development.

b) Individually or cumulatively, should not result in an adverse impact against human or natural environment.

12.2 Planning policy 7.14 (Improving Air Quality) of the London Plan 2016 recognises the importance of tackling air pollution and improving air quality to London's development and the health and wellbeing of its people. The London Plan states that the Mayor will work with strategic partners to ensure that the spatial, climate change, transport and design policies of the London Plan support implementation of Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimize public exposure to pollution.

12.3 In accordance with the aims of the National Air Quality Strategy, the Mayor's Air Quality Strategy seeks to minimise the emissions of key pollutants and to reduce concentration to levels at which no, or minimal, effects on human health are likely to occur.

12.4 To meet the aims of the National Air Quality Objectives, the Council has designated the entire borough of Merton as an Air Quality Management Area (AQMA). Therefore, development that may result in an adverse air quality including during construction, may require an Air Quality Impact Assessment in order for the Council to consider any possible pollution impact linked to development proposals.

12.5 The applicant has provided an air quality assessment with the application. The independent air quality assessment by RSK Environment Ltd (RSK). The applicant has submitted additional information following the GLA's original stage 1 comments. The GLA have now confirmed that the amended air quality report is acceptable and in line with policy. The

Councils Air Quality Officer has also raised no objection subject to conditions.

13 **Trees**

- 13.1 The applicant has submitted an independent arboricultural impact assessment and Method Statement by Arbour Cultural LTD. The report identifies that some trees would need to be removed and others protected during constructions. None of the trees are currently protected by TPO or located within a Conservation Area therefore there is no protection for their retentions. It should also be noted that the proposed landscaping scheme would include new tree planting in the public square and following further ground investigation potentially street trees along The Broadway and Trinity Road. The Councils Tree Officer has confirmed no objection subject to conditions.

14 **Affordable Housing**

- 14.1 Planning policy CS 8 (Housing Choice) of Merton's Core Planning Strategy states that development proposals of 10 units or more require an on-site affordable housing target of 40% (60% social rented and 40% intermediate). In seeking affordable housing provision, the Council will have regard to site characteristics such as site size, its suitability and economics of provision such as financial viability issues and other planning contributions. The application proposes a replacement hostel facility, with 121 bedrooms. As this use is not a C3 residential use (Sui-Generis), it does not technically fall within the definition of affordable housing at national or local policy level. Notwithstanding this, it is a housing facility to house the most vulnerable people. Officers attach significant weight to this in the assessment of the proposal.
- 14.2 The amount of affordable housing this site can accommodate has been subject of a viability assessment. Following discussions, the Councils independent viability assessor (Altair) has confirmed that the scheme cannot provide any affordable housing. An early and late stage viability review is however required which would ensure that any surplus profit outside the agreed position is secured within the legal agreement. Although no affordable housing can be provided on site, the scheme is to be delivered in 2 phases with the first phase being the demolition of the Olympic House and the western wing of the YMCA, and construction of the new YMCA building. This would allow a full de-cant of the existing YMCA facility into the new one, without having to close or disperse people. The phasing of the proposal can be secured within the S106 Agreement.

15. **Local Financial Considerations**

15.1 The proposed development is liable to pay the Merton and Mayoral Community Infrastructure Levy (CIL). Merton's Community Infrastructure Levy was implemented on 1st April 2014. This will enable the Council to raise, and pool, contributions from developers to help pay for things such as transport, decentralised energy, healthcare, schools, leisure and public open spaces - local infrastructure that is necessary to support new development. Merton's CIL has replaced Section 106 agreements as the principal means by which pooled developer contributions towards providing the necessary infrastructure should be collected.

16. **GLA**

16.1 The GLA has stated that the outstanding matters relating to inclusive access, equalities and the circular economy can be agreed prior to stage 2 referral.

Urban greening

16.2 The GLA has also confirmed that the applicant has calculated the UGF of the proposed development as 0.38, which is close to meeting the target of 0.4 set by Policy G5 of the ItP London Plan. The urban greening design appears to be maximised, and there are clear constraints in that the site area includes a large area of public realm adjoining the highway. The UGF of 0.38 is therefore accepted in this instance.

17. **Sustainability and environmental impact assessment requirements**

17.1 The proposal is for major mixed-use development and an Environmental Impact Assessment is not required in this instance.

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

18. **CONCLUSION**

18.1 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.

18.2 NPPF - Paragraph 122 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.
- 18.3 NPPF Paragraph 123 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.
- 18.4 The delivery of this site for community facilities, commercial and new housing are all in line with the adopted site allocation in the Sites and Policies Plan 2014. The new uses on the site would include both the re-provision of a new YMCA facility and new residential units which are particularly welcomed and much needed. The 135 proposed flats and 333sqm commercial units at ground floor level will create much needed new homes and jobs. The principle of development is considered to be acceptable with a mixed use development retaining a source of employment and providing much needed new hostel and residential accommodation.
- 18.5 The standard of residential accommodation is considered to offer good accommodation that would meet the needs of future occupiers. Each unit would have direct access to private amenity space as well as communal areas at sixth floor level which would exceed minimum standards. The proposed housing mix is considered to be acceptable for its town centre location and viability constraints. The level of affordable housing is agreed due to viability considerations.
- 18.6 The design of the development is considered to be of exceptional quality in terms of appearance and character and would be appropriate in terms of height and massing in this context. At street level, the proposed development is considered to improve the visual amenities of the street scene, with a vast improvement of the design of the buildings on the site, increased footpath width and a new public square. The proposed density range is considered acceptable in this instance given the quality of the design. The proposed building would respect the context of the site, wider area and as such would preserve the nearby South Park Gardens Conservation Area.
- 18.5 The letters of objection from neighbouring properties have been assessed. The applicant's Sun and Daylight report sets out justifications for shortfalls and alternative targets of BRE guidance used in the industry to justify the impacts on surrounding properties. It is acknowledged, that the proposed building would result in a noticeable uplift in development on the site, however the potential of the site is being delivered within this urban town centre setting where the larger building would not appear out of keeping with existing and future patterns of development in Wimbledon Town

Centre. On balance, it is considered that the proposed development would not result in undue loss of neighbouring amenity to warrant refusal of planning permission in this instance, given the context of the site, planning policy and recent appeal decision stated throughout the report.

- 18.6 There would be no undue impact upon flooding, transport, biodiversity, contamination, sustainability, archaeology, air quality or trees.
- 18.7 The proposal is considered to be in accordance with Adopted Sites and Policies Plan, Core Planning Strategy and London Plan policies. The proposal is therefore recommended for approval subject to conditions and S106 agreement.

RECOMMENDATION

GRANT PLANNING PERMISSION subject to –

1. The application being referred to the Mayor of London, in accordance with the Mayor of London Order 2008
2. Subject to conditions and the completion of a Section 106 Agreement covering the following heads of terms:-
 - (1) Subject to the completion of a Section 106 Agreement covering the following heads of terms:-
 1. Permit Free.
 2. Zero Carbon (TBA contribution).
 3. Car Club Membership (3 years).
 4. Implementation of loading Restrictions (TBA contribution), pavement re-surfacing and street tree planting.
 5. Travel Plan.
 6. Affordable Housing (early and late stage viability review required).
 7. Hostel must remain for that use in perpetuity.
 8. Phasing of development (Phase1 and Phase 2)
 9. The developer agreeing to meet the Councils costs of preparing, drafting and monitoring the Section 106 Obligations.

And the following conditions:

1. A1 Commencement of Development (full application)
2. A7 Approved Plans
3. B.1 Materials to be approved, including detailed plans at a scale of 1:20 of some of the typical details
4. B.4 Details of Surface Treatment
5. B.5 Details of Walls/Fences
6. C06 Refuse & Recycling
7. C08 No use of flat roofs
8. D01 Hours of Use
10. D03 Restriction of Music/Ampilified Sound
11. D10 External Lighting
12. D11 Construction Times
13. E05 Restriction – Use of Premises (no supermarket)
14. F01 Landscaping/Planting Scheme (including street trees)
15. F09 Hardstanding's
16. H03 Redundant Crossovers
17. H04 Provision of Vehicle Parking
18. H06 Cycle Parking
19. H10 Construction Vehicles, Washdown Facilities Etc (major sites)
20. H12 Delivery and Servicing Plan to be submitted
21. H13 Demolition/Constriction Logistic Plan to be subject (major development) - (including a Construction Management plan in accordance with TfL guidance) should be submitted to LPA for approval before commencement of work.

22. H14 Garage Doors/Gates
- 22 Management strategy for communal roof terraces
- 23 Signage
- 24 No use of gym garden and windows/doors kept closed.
- 25 Residential CO2 reductions and water use
- 26 Non-residential CO2 reductions and BREEAM
- 27 District Heat Networks – London Heat Networks Manual
- 28 Be Seen' energy monitoring
- 29 Energy Efficiency Target
- 30 Prior to the commencement of development, a detailed scheme 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) at the agreed runoff rate (no more than 2l/s, with no less than 228m³ of attenuation volume), in accordance with drainage hierarchy contained within the London Plan Policy (5.12, 5.13 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 5.13.
- 31 Prior to the commencement of development, the applicant shall submit a detailed proposal on how drainage and groundwater will be managed and mitigated during and post construction (permanent phase), for example through the implementation of passive drainage measures around the basement structure.
- 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 5.13

32. Prior to the commencement of development, the detailed design and specification for the green roofs shall be submitted to and approved in writing by the Local Planning Authority. The design shall be carried out as approved, retained and maintained by the applicant in perpetuity thereafter.

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 5.13.

33. Ecology and bat report (including swift bricks)

34. Tree Protection: The details and measures for the protection of the existing trees as specified in the hereby approved document 'BS5837 Arboricultural Report, Arboricultural Impact Assessment & Method Statement' reference 'AC.2020.151' dated '21 May 2020' shall be fully complied with. The methods for the protection of the existing tree shall fully accord with all of the measures and stages as specified in the report and these shall be installed prior to the commencement of any site works and shall remain in place until the conclusion of all site works.

Reason: To protect and safeguard the existing trees in accordance with the following Development Plan policies for Merton: policy 7.21 of the London Plan 2015, policy CS13 of Merton's Core Planning Strategy 2011 and policies DM D2 and 02 of Merton's Sites and Policies Plan 2014.

35. Site Supervision (Trees) – The details of the approved 'BS5837 Arboricultural Report, Arboricultural Impact Assessment & Method Statement' shall include the retention of an arboricultural expert to monitor and report to the Local Planning Authority not less than monthly the status of all tree works and tree protection measures throughout the course of the demolition and site works. A final Certificate of Completion shall be submitted to the Local Planning Authority at the conclusion of all site works. The works shall be carried out in accordance with the approved Arboricultural Method Statement and Tree Protection Plan.

Reason: To protect and safeguard the existing trees in accordance with the following Development Plan policies for Merton: policy 7.21 of the London Plan 2015, policy CS13 of Merton's Core Planning Strategy 2011 and policies DM D2 and 02 of Merton's Sites and Policies Plan 2014.

36 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 the principles and objectives of 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 14 (22.17) of Merton Core Strategy: Design, and Strategic Objectives 2 (b) and 5 (f); and Policy 7.3 Designing out Crime of the London Plan.

37. Prior to occupation a Secured by Design final certificate 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 improve community safety and crime prevention in accordance with Policy 14 (22.17) of Merton Core Strategy: Design, and Strategic Objectives 2 (b) and 5 (f); and Policy 7.3 Designing out Crime of the London Plan.

38. No works will commence on site until the below documents have been submitted and agreed by the Planning Officer.

- a) Detailed Demolition Method Statement produced by the Contractor appointed for demolishing the existing buildings.
- b) Detailed piling methodology produced by the Contractors appointed for the piling.
- c) Structural drawings of the piles adjacent to the highway boundary.
- d) Movement monitoring report produced by specialist surveyors appointed to install monitoring gauges to detect any movement of the highway/neighbouring properties from pre-construction to completion of the project works as recommended by the Construction Method Statement. The report should include the proposed locations of the horizontal and vertical movement monitoring, frequency of monitoring, trigger levels, and the contingency measures for different trigger alarms.

39. Non-Road Mobile Machinery (NRMM) - 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 ensure that the development would not result in a deterioration of air quality.

40. Construction Management Plan - Prior to the commencement of the development a Construction Management Plan shall be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise, vibrations and other environmental impacts of the development.

41. A deskstudy, then an investigation shall be undertaken to consider the potential for contaminated-land, and if necessary, a detailed remediation scheme to bring the site to a suitable state for the intended use by removing unacceptable risks to health and the built environment, and submitted to the approval of the LPA.

Reason: To protect the health of future users of the site in accordance with policy 5.21 of the London Plan 2015 and policy DM EP4 of Merton's sites and policies plan 2014.

42. The approached remediation shall be completed prior to development. And a verification report, demonstrating the then effectiveness of the remediation, subject to the approval of the LPA.

Reason: To protect the health of future users of the site in accordance with policy 5.21 of the London Plan 2015 and policy DM EP4 of Merton's sites and policies plan 2014.

43. No properties shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and

infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents.

- 44 No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

- 45 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.

46. Details of playspace

47. Due to the potential impact of the surrounding locality on the development the recommendations to protect noise intrusion into the residential dwellings as specified in the RBA Acoustics, Noise Assessment Report Ref:9432.RP01.AAR.1, dated 26th May 2020 shall be implemented as a minimum standard for the glazing and

mechanical ventilation. A post construction noise survey shall be conducted and remedial measures implemented should be submitted criteria fail to be achieved, first being agreed by the LPA.

48. The use, hereby approved, shall not commence until a scheme for the soundproofing of the building for the Gymnasium/Childrens Area element to prevent the transmission of noise and vibration from the use of the gym, including impact noise, has been submitted to and approved in writing by the Local Planning Authority. The measures as approved shall be implemented in strict accordance with the approved details prior to the first use of the development and shall thereafter be retained.
49. The use of the rear ground floor open area of the development shall be prohibited for use in connection with the permitted planning development, with the exception of building maintenance/servicing.
50. Noise levels, (expressed as the equivalent continuous sound level) LAeq (15 minutes), from the new plant/machinery shall not exceed LA90-10dB at the boundary with the closest residential property.
51. No music or other amplified sound generated on the premises shall be audible at the boundary of any adjacent residential premises.
52. No development shall take place until a Demolition and Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the demolition and construction period.

The Statement shall provide for:

- hours of operation
- the parking of vehicles of site operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials used in constructing the development
- the erection and maintenance of security hoarding including decorative -displays and facilities for public viewing, where appropriate
- wheel washing facilities
- measures to control the emission of noise and vibration during construction/demolition. (including the methodology for the basement excavation and any 24 hour generator/pumping)
- demonstration to show compliance with BS5228

- measures to control the emission of dust and dirt during construction/demolition
- a scheme for recycling/disposing of waste resulting from demolition and construction works

53. Obscure glazing to rear facing hostel windows
54. Fire Strategy Report
55. Inclusive Design

Planning Informatives:

1. Carbon emissions evidence requirements for post construction stage assessments must provide:
 - 'As Built' SAP Compliance Reports and detailed DER and TER worksheets for the as built development. The output documents must be based on the 'as built' stage of analysis and must account for any changes to the specification during construction. The outputs must be dated and include the accredited energy assessor's name and registration number, the assessment status, plot number and development address. OR, where applicable:
 - A copy of revised/final calculations as detailed in the assessment methodology based on 'As Built' SAP outputs;
 - AND
 - Confirmation of Fabric Energy Efficiency (FEE) performance where SAP section 16 allowances (i.e. CO2 emissions associated with appliances and cooking, and site-wide electricity generation technologies) have been included in the calculation.
 - AND, where the developer has used SAP 10 conversion factors:
 - The completed Carbon Emissions Reporting Spreadsheet based on the 'As Built' SAP outputs.
 - AND, where applicable:
 - MCS certificates and photos of all installed renewable technologies.
2. Water efficiency evidence requirements for Post Construction Stage assessments must provide:
 - Documentary evidence representing the dwellings 'As Built'; detailing:

- the type of appliances/ fittings that use water in the dwelling (including any specific water reduction equipment with the capacity / flow rate of equipment);
- the size and details of any rainwater and grey-water collection systems provided for use in the dwelling; AND:
- Water Efficiency Calculator for New Dwellings; OR
- Where different from design stage, provide revised Water Efficiency Calculator for New Dwellings and detailed documentary evidence (as listed above) representing the dwellings 'As Built'

3. Carbon emissions evidence requirements for Post Construction stage assessments must provide:

- Detailed documentary evidence confirming the Target Emission Rate (TER), Building Emission Rate (BER) and percentage improvement of BER over TER based on 'As Built' BRUKL model outputs; AND
- A copy of the Building Regulations Output Document from the approved software. The output documents must be based on the 'as built' stage of analysis and must account for any changes to the specification during construction; AND
- A BREEAM post-construction certificate demonstrating that the development has achieved a BREEAM rating of not less than the standards equivalent to 'Very Good

AND, where the developer has used SAP 10 conversion factors:

- The completed Carbon Emissions Reporting Spreadsheet based on the 'As Built' SAP outputs.

AND, where applicable:

- MCS certificates and photos of all installed renewable technologies.

4. Environment Agency - Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or discharging to a stream), and we have a regulatory role in issuing and monitoring them.

The applicant should contact 03708 506 506 or consult our website to establish whether a consent will be required -

<https://www.gov.uk/environmental-permit-check-if-you-need-one>

5. 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.

6. It is Council's policy for the Council's contractor to construct new vehicular access. The applicant should contact Council's Highway Team on: 0208 545 3829 prior to any work starting to arrange for this works to be done.

Highways must be contacted prior to any works commencing on site to agree relevant licences, and access arrangements – no vehicles are allowed to cross the public highway without agreement from the highways section.

7. In preparing the Construction Management Plan, the applicant should refer to the GLA's Supplementary Planning Guidance on The Control of Dust and Emissions During Construction and Demolition to identify best practice.

8. The applicant should be aware that the site may provide a useful habitat for swifts. Swifts are currently in decline in the UK and in order to encourage and improve the conservation of swifts the applicant is advised to consider the installation of a swift nesting box/bricks on the site.

9 INF9 Works on the Public Highway

10 INF12 Works Affecting the Public Highway