

GREATER LONDON AUTHORITY

Good Growth

Stuart Adams
London Borough of Merton
Development Control, Planning
Merton Civic Centre
London Road
Morden
Surrey SM4 5DX

Our ref: 2020/6363/S1

Your ref: 20/P1738

Date: 12 October 2020

By Email

Dear Stuart Adams

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**196-200 The Broadway, 196-200 The Broadway
Wimbledon
SW19 1RY**

Local Planning Authority reference: 20/P1738

I refer to the copy of the above planning application, which was received from you on 27 August 2020. On 12 October 2020 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference 2020/6363/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

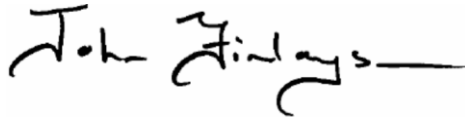
The Deputy Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 89 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the

authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Lucy Simpson, email LucySimpson@tfl.gov.uk, telephone 0203 054 7039.

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John Finlayson
Head of Development Management

cc Leonie Cooper, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, Transport for London
Mr Holloway, Daniel Watney LLP, 165 Fleet Street, London EC4A 2DW

196-200 The Broadway
in the London Borough of Merton
planning application ref: 20/P1738

Strategic planning application stage 1 referral

Town and Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and the comprehensive redevelopment of the site to provide a mixed-use scheme in buildings up to 9 storeys comprising 135 residential units, 121 room homeless persons' hostel with ancillary café and gym, and flexible commercial and community floorspace.

The applicant

The applicant is **YMCA St Paul's Group & Thornsett Wimbledon Ltd**, and the architect is **DLA Design**.

Strategic issues

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 Heathy 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.

Context

1 On 27 August 2020, the Mayor of London received documents from Merton Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town and Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Intend to Publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1C(1c) - "Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London".

3 Once Merton Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 0.36 hectare site is situated 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.

6 The site is currently occupied by three main structures: the YMCA building (9 storeys), Olympic House (7 storeys) and Tower Lodge (3 storeys). The YMCA is an operative YMCA facility, ranging in height from two to nine storeys and comprising 111 hostel rooms which accommodate local homeless residents. A variety of supporting activities are also located within the existing site including a lounge, chapel, fitness studio, restaurant and computer room. The YMCA facility provides 24-hour on-site support and delivers a programme of activities and workshops for homeless residents, with some facilities, including the gym, also available for use by the wider community. Tower Lodge is also used by the YMCA as office and meeting space, and Olympic House provides office accommodation, as well as floors of accommodation for an existing language school.

7 The site has a local plan allocation within the Merton Sites and Policies Plan and Policies Maps (2014) and Merton's draft New Local Plan 2020. While there are no listed structures or buildings located within the site, and the site is not located within any conservation areas, it is located approximately 140 metres south of the South Park Garden's Conservation area, and approximately 160 metres north of the Pelham Road Conservation Area, and in proximity to a number of other designated heritage assets.

8 The closest section of the Transport for London Road Network is the A24 Merantun Way approximately 820 metres southeast of the site. The closest section of the Strategic Road Network is the A238 Kingston Road located approximately 400 metres to the south of the site. The Wimbledon to Raynes Park Quietway cycle route starts at the Francis Grove / St George’s Road junction.

9 The site has a Public Transport Access Level (PTAL) of 6b, on a scale ranging from 0 to 6b, where 6b represents the highest level of access to public transport facilities. The site has access to four high frequency bus services on Sir Cyril Black Way, a seven minute walk from the site, along with bus services adjacent to Trinity Church on The Broadway, a two minute walk from the site. The site also benefits from being within close proximity (eight minute walk) from Wimbledon Rail Station, providing access to South Western Railway, Southern and Thameslink rail services, London Tram Services and London Underground Services (District Line). London Underground services (Northern Line) are also available at South Wimbledon Station, a nine minute walk from site.

Details of the proposal

10 The proposal is for the demolition of the existing buildings and the comprehensive redevelopment of the site to provide a mixed-use scheme in buildings up to 9 storeys in height comprising 135 residential units, 121 room homeless hostel (*Sui Generis* land use) with ancillary café and gym, and 333 sq.m. of flexible commercial and community (A1/A2/A3/B1/D1) floorspace, alongside car and cycle parking and landscaping.

11 The development is proposed to be delivered in two phases. Phase 1 is proposed to comprise the demolition of Olympic House and part of the YMCA to deliver a 121-room homeless hostel with ancillary, publicly accessible café and gym. Phase 2 is proposed to comprise demolition of remainder of the site and delivery of 135 residential units and 333 sqm of flexible A1/A2/A3/B1/D1 floorspace, alongside car and cycle parking, landscaping and associated works.

12 The breakdown of the housing is set out in Table 1, below:

Table 1 – Housing proposals

Market Housing	1-Bed	2-Bed	3-Bed	Total
Total	109 (80.75%)	25 (18.5%)	1 (0.75)	135 (100%)

Case history

13 GLA officers held a pre-application meeting on this scheme on 27 November 2019. The pre-application report (reference number GLA/5216) concluded that any future planning application will need to address issues raised in relation to principle of development, housing and affordable housing, urban design, heritage, fire safety, inclusive design, energy, water and transport as part of the application submission to ensure that the development complies with the London Plan and the Mayor’s Intend to Publish London Plan.

14 It is also noted that the site was previously subject to pre-application discussions (GLA Ref: 3233) with GLA Officers held at City Hall on the 15 October 2013, in relation to a mixed-use development and covered several topics, including: urban design, inclusive design, housing, climate change mitigation and adaptation and transport.

Strategic planning issues and relevant policies and guidance

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Merton Core Planning Strategy (2011), Merton's Sites and Policies Plan and Policies Map 2014-2024 and the London Plan 2016 (Consolidated with alterations since 2011).

16 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance;
- The London Plan Intend to Publish Version (December 2019) which should be taken into account on the basis explained in the NPPF;
- On the 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation;
- The Mayor's Affordable Housing and Viability SPG; and
- Merton's draft New Local Plan 2020 (Stage 2 public consultation October 2018 to January 2019); and
- Draft Future Wimbledon Supplementary Planning Document (SPD)

17 The relevant issues and corresponding policies are, as follows:

- Town centres London Plan; Mayor's Intend to publish London Plan;
- Social infrastructure London Plan; Mayor's Intend to publish London Plan; Social Infrastructure SPG;
- Equalities London Plan; Mayor's Intend to Publish London Plan; Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG.
- Housing and affordable housing London Plan; Mayor's Intend to publish London Plan; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Urban design and heritage London Plan; Mayor's Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG;
- Inclusive design London Plan; Mayor's Intend to Publish London Plan; Accessible London: Achieving an Inclusive Environment SPG;

- Sustainable development London Plan; Mayor's Intend to Publish London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Air quality London Plan; Mayor's Intend to Publish London Plan; Control of dust and emissions during construction SPG.
- Ambient noise London Plan; Mayor's Intend to Publish London Plan; the Mayor's Environment Strategy.
- Transport London Plan; the Mayor's Transport Strategy.

Principle of development

Supported and specialised accommodation – hostel for rough sleepers

18 Policy H12 of the Mayor's Intend to Publish London Plan sets out that delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. Policy H12 recognises that supported and specialised accommodation includes a range of accommodation types, including accommodation for rough sleepers, which potentially could be in a hostel setting and is likely to include some communal facilities but does not include visitor accommodation. The policy sets out that the form this accommodation takes will vary, and the accommodation should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners within a wider inclusive community setting.

19 Policy H8 of the Mayor's Intend to Publish London Plan sets out that the loss of hostels and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard. Policy 3.14 of the London Plan sets out similar provisions.

20 The proposal seeks to reprovide and increase the number of bed spaces within the hostel (from 111 existing bed spaces to 121 proposed bed spaces, an uplift of ten bed spaces), and to improve the quality of hostel accommodation for residents through the construction of a purpose-built facility including an increase in bedrooms sizes, the provision of individual en-suite bathrooms, kitchen facilities on every floor enabling residents to independently prepare meals, and the reprovision of the communal lounge space. The principle of the reprovision of this supported accommodation is strongly supported in accordance with Policy H12 of the Mayor's Intend to Publish London Plan.

Social infrastructure and community facilities – gym, chapel, community and education floorspace

21 London Plan Policy 3.16 and Policy S1 of the Mayor's Intend to Publish London Plan outline that the loss of social infrastructure in areas of defined need should only be permitted where there are realistic proposals for reprovision, or the loss if part of a wider public transformation plan which requires investment to meet future needs or to sustain and improve services. Social infrastructure covers a wide range of facilities and includes schools, community, recreation and leisure facilities. Policy S3 of the Mayor's Intend to Publish London Plan sets out that development

proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need.

22 The proposals seek to reprovide a variety of YMCA facilities including the hostel, chapel and gym within the proposed development. In accordance with Policy S1 of the Mayor's Intend to Publish London Plan, the continued co-location of community and social infrastructure facilities is supported in the interests of using land more efficiently and enabling a more integrated service delivery.

23 The existing gym on site has a membership of 600 registered users, with soft play and community hire facilities. The proposals seek to reprovide a gym that is 636 sq.m. in size, which includes changing facilities, a children's room and various gym studios. The principle of the reprovision of the gym facility is supported as it continues to serve the local community. The proposals include a reprovided chapel (14 sq.m. in size) within the first floor of the hostel facility. The principle of the reprovision of the chapel is supported. Clarification should be provided in respect of the size of the existing gym and chapel facilities to demonstrate compliance with London Plan Policy 3.16 and Policy S1.

24 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 applicant seeks to justify this loss by setting out that the fundamental driver of the development is to deliver a scheme for the community, through retention of the YMCA and the provision of a gym and café use within the YMCA so that hostel residents can interact with the local and wider community. While this is acknowledged, noting that the proposals do not appear to reprovide the floor space of the existing on-site education facility, the applicant should demonstrate compliance in accordance with the requirements set out in London Plan Policy 3.16 and Policies S1 and S3 of the Mayor's intend to publish London Plan.

Commercial floorspace and town centre uses

25 Policy GG5 of the Mayor's Intend to Publish London Plan states that to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must, among other things, promote the strength and potential of the wider city region. The policy also seeks to ensure that London's economy diversifies and plans for sufficient employment space in the right locations to support economic development and regeneration. London Plan Policy 2.15 and Policy SD6 of the Mayor's Intend to Publish London Plan recognise that town centres should be the foci for commercial development beyond the Central Activities Zone. Policy SD8 of the Mayor's Intend to Publish London Plan seeks a range of sizes of commercial units to support the diversity of the town centre and Policy SD6 of the Mayor's Intend to Publish London Plan states that town centres should also be strengthened to remain the primary location for commercial activity beyond the CAZ as well as a focus for place and local identity.

26 In addition, London Plan Policy 4.2 and Policy E1 of the Mayor's Intend to Publish London Plan seek to consolidate and, where viable, extend office provision in town centre locations. Over the 2016 – 2041 plan period, demand for office

floorspace in outer London is expected to rise by 23%, with an increasing proportion required for micro, small and medium-sized enterprises.

27 The site lies within the Wimbledon Town Centre, and additionally in the Love Wimbledon Business Improvement District, which seeks to enhance the town centre's commercial vitality. Further to this, the site has a local plan allocation within the Merton Sites and Policies Plan and Policies Maps (2014) and Merton's draft New Local Plan 2020. The allocated use for the site is for a suitable mix of retail, financial and professional services, restaurants and cafes and drinking establishments, offices, community and leisure/sporting uses, hostel and residential and hotels.

28 As existing, Olympic House accommodates 1,124 sq.m. of office floorspace. While the scheme has the capacity to re-provide office floorspace through the provision of 333 sqm of flexible commercial floorspace within two units at ground floor level, it is noted that the DAS states the aspiration of these commercial units is to have restaurants or cafes that will attract visitors encouraging the use of the public space with outdoor spaces in the warmer months, and it is not expected that an office tenant will occupy these spaces.

29 The Mayor's Intend to Publish London Plan and London Plan seek to consolidate office floorspace in town centre locations and it is considered that the loss of existing commercial floorspace from the site could both impact Merton's competitiveness within this Love Wimbledon BID location, as well as reduce the number of jobs that the site has the potential to support. It is noted, however, that the wider site allocation boundary also includes the neighbouring site at 188-194 The Broadway (an existing two-storey building with retail use on the ground floor and one residential unit on the upper floor) which has recently been granted planning permission on appeal (LPA ref: 18/P2918), and includes the provision of 1,420 sq.m. 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, in this instance, GLA Officers do not raise strategic concern in respect of the loss of office land use from this town centre location.

Housing

30 London Plan Policy 3.3, in seeking to increase the supply of housing in London, sets borough housing targets and in Table 3.1 puts the minimum annual monitoring target for the Borough of Merton at 4,107 additional homes between 2015 and 2025. The Intend to Publish London Plan sets a ten-year target of 9,180 for the period 2019/2020 to 2028/2029. This proposed scheme would deliver 135 new residential units which would contribute to the above housing targets. Accordingly, the principle of residential development on the site is supported. Affordable housing is discussed in further detail in the subsequent section of this report.

Affordable housing

31 London Plan Policies 3.11 and 3.12 and Policies H5 and H6 of the Mayor's Intend to Publish London Plan seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of

affordable housing in London and embed affordable housing into land prices. This SPG introduced a threshold approach to viability, which is incorporated within Policy H5 of the Mayor's Intend to Publish London Plan; schemes that meet or exceed 35% affordable housing on site without public subsidy, meet the specified tenure mix and meet other relevant policy requirements and obligations to the satisfaction of the Borough and Mayor can follow the 'Fast Track Route' set out in the SPG and Policy H5 of the Mayor's Intend to Publish London Plan, are generally not required to submit viability information nor be subject to a late stage review.

32 Policy H6 of the Mayor's Intend to Publish London Plan and the Mayor's SPG sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent, significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority. It is the Mayor's expectation, however, that the remaining 40% is weighted towards the provision of affordable rented products. In the context of the above, the adopted Local Plan, Merton's Core Planning Strategy seeks a tenure split of 60% social rent and 40% intermediate.

33 The scheme is proposing no affordable housing (0%), which is unacceptable in the absence of a verified viability position. The application sets out that the residential element of the scheme is cross-subsidising the reprovision of new YMCA hostel and facilities. In line with London Plan Policy 3.12 and Policy H5 of the Mayor's Intend to Publish London Plan, a Financial Viability Appraisal (FVA) has been submitted as part of the application, which is currently being scrutinised by the Council and GLA officers to establish the need for, and the nature of, the cross-subsidy proposed. Through the assessment of the viability assessment, GLA officers will seek to ensure that any surplus is used for additional bed spaces within the homeless persons hostel or is used to contribute to affordable housing. The bed spaces within the homeless persons hostel must remain for that use in perpetuity; this should be secured within a Section 106 Legal Agreement. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral.

34 As with all schemes which follow the 'Viability Tested Route', the application will be subject to both early implementation and late stage viability reviews, in accordance with Policy H5 of the Mayor's Intend to Publish London Plan. Early and late-stage review mechanisms should ensure that any additional affordable housing is provided on-site where sufficient surplus profit is generated, in line with the Mayor's Affordable Housing and Viability SPG.

35 In accordance with the Mayor's Affordable Housing and Viability SPG, the Council is required to publish the financial viability assessment (including any reviews) to ensure transparency of information.

Housing mix

36 London Plan Policies 3.8 and 3.11, as well as Policy H10 of the Mayor's Intend to Publish London Plan, encourage a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.

37 The scheme proposes 135 residential units, of which the majority (80.75%) are proposed as 1-bed units, alongside 25 x 2-beds and 1 x 3-bed. Subject to the Council confirming the proposed mix meets the local need of the Borough, GLA officers do not raise any strategic concerns about the proposed housing mix.

Equalities

38 London Plan Policy 3.1 and Policy GG1 of the Intend to Publish London Plan highlight the diverse nature of London's population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

39 Given the proposed redevelopment of the homeless persons facility and other on-site social infrastructure including chapel and publicly accessible gym, an equalities impact assessment should be provided with the planning application to assess the impact of the development on persons who share a relevant protected characteristic and whether mitigation should be secured as part of any permission to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

Urban design

40 The design principles in chapter seven of the London Plan and chapter 3 of the Mayor's Intend to Publish London Plan expect all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality. London Plan Policy 3.4 and Policy D3 of the Mayor's Intend to Publish London Plan seek to optimise the potential of sites. As per Policy D3 of the Mayor's Intend to Publish London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth.

41 The height of the proposed development responds well to the site's town centre context and seeks to optimise this brownfield site. No concerns are raised in respect of height from a strategic perspective. The proposals have been developed in consultation with the planning officers and has been presented at two Merton Design Review Panel meetings. The massing of the scheme, with YMCA and private housing separated by the new south-facing public square, and stepping down towards existing homes to the north, is supported.

42 The layout of the scheme seeks to optimise the site. The proposed commercial uses at ground level on The Broadway respond to the high-street context of Wimbledon, while residential front doors respond to the more residential context of Trinity Road. The provision of a public square is a positive element of the scheme and is strongly supported. The simple but functional landscape design is appropriate for the context of the site. High quality planting, paving and lighting should be secured by the Council, as well as areas for rest and shade, and a maintenance / management strategy for this space should be secured.

43 The architectural aesthetic appears a good quality, contemporary design. The success of the architectural approach will be dependent on the use of the highest quality materials. To ensure high quality, low maintenance finishes, the Council should secure materials by condition.

Quality of hostel accommodation

44 As existing, the bedrooms are approximately 10 sq.m. in size, with shared washing facilities and a shared canteen. The new en-suite bedrooms are proposed at a minimum of 15 sq.m. in size, providing an improved quality of accommodation. Two stairwell cores and two lifts are proposed to provide access to the hostel floors. A variety of supporting spaces would also be provided, including activity room, communal lounge, chapel and kitchen facilities on every floor. The provision of these facilities is supported.

45 While it is recognised that the hostel facilities provide for temporary accommodation, as opposed to permanent residential accommodation, the hostel will be providing sleeping accommodation to vulnerable residents. Consideration should be had to whether variation in window locations within the hostel bedrooms could provide for improved privacy within these facilities.

Residential Quality

46 London Plan Policy 3.5 and Policy D6 of the Mayor's Intend to Publish London Plan promote quality in new housing provision, with further guidance provided by the Housing SPG.

47 All the proposed units have been designed to meet the nationally described space standards and the proposed development will include a range of private and communal amenity spaces. This includes balconies, terraces or winter gardens. Communal spaces are provided at third floor (64 sq.m) and sixth floor (114 sq.m) of the residential building.

48 In terms of residential quality provided by way of a dual aspect unit, 63.7% of units across the scheme are dual aspect. While this is a relatively low number, it is noted that the applicant has sought to optimise the site, there are no north-facing single aspect units and the majority of beds proposed are 1-bed units. While privacy distances between the units located overlooking the courtyard space are limited (approximately 9 metres), all units surrounding this courtyard have a dual aspect.

49 The five units proposed at ground level along Trinity Road are duplex units with gardens and balconies, presenting a suitable quality of residential

accommodation in this town centre location, while also providing activation through the inclusion of front door access from Trinity Road. This is supported.

50 There are three cores available to access the residential accommodation. Each core appears to serve a maximum of 8 apartments, and to have access to natural daylight and ventilation.

Play space

51 London Plan Policy 3.6 and Policy S4 of the Mayor's Intend to Publish London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child.

52 The application sets out that the proposal generates a requirement of 86 sq.m. of play space, and that a provision of 110 sq.m. is proposed at sixth floor level with informal play equipment such as balance beams, stepping logs and rubber play balls, as well as providing seating and a biodiverse green roof to add visual and ecological interest. GLA Officers anticipate the proposals would generate a play space requirement of between 158 sq.m. and 222 sq.m. As such, the play space calculations and proposals should be reviewed to ensure that policy compliant levels of play space are provided.

53 The provision of on-site high quality, safe, playable features for children, as well as safety measures and shaded spaces, should be secured by the Council via condition or S106 obligation.

Fire safety

54 In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the Mayor's Intend to Publish London Plan seeks to ensure that development proposals achieve the highest standards of fire safety. In accordance with Policy D12, a Fire Strategy (Fire Statement) has been submitted with the application for both the residential block and the YMCA Hostel. To demonstrate compliance with Policy D12, the fire statement must be revised to include the qualifications of the assessor who has prepared the document; this should be specified within the statement. Additionally, the fire statement should demonstrate that any potential future modifications to the building will take into account and not compromise the base build fire safety / protection measure, as required by Policy D12(B)(6). The submitted document recognises that there are detailed aspects of design, including construction details, that have not been addressed within the fire strategy, as required by Policy D12(B)(1). As such, notwithstanding the submitted fire statement, the Council should ensure that policy compliant commitments are secured via condition in order to accord with Policy D12(B1-6) of the Mayor's Intend to Publish London Plan. Furthermore, Policy D5(b) of the Mayor's Intend to Publish London Plan sets out that in all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building; this should be appropriately secured.

Heritage

55 London Plan Policy 7.8 and Policy HC1 of the Mayor's Intend to Publish London Plan state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

56 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

57 While the site itself does not contain any designated heritage assets, nor is the site located within a conservation area, there are a number of designated heritage assets in proximity to the site, including: the South Park, Pelham Road and Wimbledon Broadway Conservation Areas; Grade II listed South Park Gardens (Registered Park and Garden); and a number of Grade II listed buildings and structures (namely Wimbledon Theatre, St Winefride's RC Church, Former Pelham High School, Town Hall, Former Wimbledon Fire Station (Queens Road) and the Horse trough in South Park Gardens.

58 The planning application has been supported by a Heritage, Townscape and Visual Impact Assessment (HTVIA), which assesses the impact of the proposed development on these designated heritage assets. The HTVIA concludes that the development would have a negligible effect on the setting of South Park Gardens and cause no harm to its heritage significance as a conservation area and Registered Historic Park, and that the settings of the listed buildings (and locally listed buildings) are similarly unaffected. GLA Officers agree with the conclusions presented within the report and consider that due to the distance of the proposed development to the designated heritage assets, the proposed development's built form, and the relative scale and character of the surrounding environmental form, it is not anticipated the proposed development would result in harm to the respective settings or significance of the heritage assets.

59 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, GLA officers are satisfied that no harm will arise to the nearby designated heritage assets through the delivery of the proposed scheme.

60 Noting the high-quality design of the scheme, it is considered that the proposed development is generally sympathetic to the form, scale, materials and architectural detail of the nearby designated heritage assets as considered above, and the scheme accords with London Plan Policy 7.8. and Policy HC1 of the Mayor's intend to publish London Plan.

Inclusive design

61 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy 3.8 and Policy D7 of the Mayor's Intend to Publish London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

62 The application details that all flats meet the standards of Part M4(2), and that 10% of the proposals, including both 1-bed and 2-bed units are Part M4(3) compliant. The Council should ensure policy compliant levels of accessible dwellings are carried through to the detailed design stages, with appropriate conditions securing the provision throughout the development, providing disabled and older people similar choices to non-disabled people. In addition, GLA officers expect that a proportion of bedrooms within the hostel facility are suitable for providing wheelchair accessible accommodation, and clarification in regard to accessibility within the hostel is required.

63 As further detailed in the Fire Safety section of this report, a minimum of at least one lift per core (or more subject to capacity assessments) is a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, in accordance with Policy D5 of the Mayor's Intend to Publish London Plan.

Environment

Energy

64 To ensure compliance with policies of the London Plan and the Mayor's Intend to Publish London Plan, further information is required in respect of a number of elements of the energy strategy. This includes information on costs to occupants and further information on the proposed air source heat pumps. Further consideration of the overheating assessment is required, and the report should be submitted in full for assessment. Additional information is required to assess the potential for district heating connections and design to future-proof for connection and further measures are required for the Be Lean assessment. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.

Air quality

Overview of proposals

65 The application has concluded in the impact assessment that the proposed development would lead to moderate adverse impacts on two existing receptors (EC01.G and ER01.1). However, the traffic data used in the dispersion model (Appendix C of the report) shows a reduction in vehicle movements on all road links (with only a marginal increase in proportion of HGVs), and so professional opinion would suggest this conclusion is incorrect. There is also an error in the presentation of results in Table 5.6 of the air quality assessment. These should be corrected and re-submitted to GLA officers.

66 Based on the air quality neutral calculations, the proposed development can be considered air quality neutral and in compliance with London Plan Policy 7.14 (B) (c) and Policy SI 1 (B) (2a) of the Mayor's Intend to Publish London Plan.

Recommendations

67 The proposed development is not compliant with London Plan air quality policies at this stage. The dispersion model should be revisited, and the conclusions of the assessment should be presented clearly, following the comments outlined in the following three paragraphs.

68 It is advised to only present receptors relevant to the air quality objectives under consideration. Moreover, all modelled receptor points should be described clearly to enable a review of the receptors chosen. In this case, the choice and labelling of receptor points is confusing.

69 The reduction in traffic between 'without development' and 'with development' scenarios should lead to a reduction in concentrations, not the significant increase as presented. This is especially the case given no changes to traffic management or road layout as part of the scheme. The model should be revisited to ensure traffic data is calculated correctly between scenarios S2 and S3, concentrations are predicted correctly and EPUK/IAQM impact descriptors are applied correctly.

70 The table of predicted PM₁₀ concentrations (Table 5.6 of the submitted report) contains an error in the existing receptors (column 4 to column 6). This should be corrected as it contains information essential to the conclusions of the assessment.

Urban greening and trees

71 The proposed development includes a number of green roofs which are shown in the Design and Access Statement to be biodiverse roofs with a substrate depth of 150mm, this is welcomed and will achieve the greatest benefits. These green roofs should be brought to fruition.

72 The Urban Greening Factor (UGF) should be calculated, as set out in Policy G5 of the Mayor's Intend to Publish London Plan, and achieve the specified target of 0.4. A drawing showing the surface cover types and accompanying UGF calculation should be submitted prior to Stage 2.

73 The proposed development would result in the removal of 9 trees and the replanting of 15 trees. The current species list for proposed trees planting is limited

and does not include species that would grow to achieve a large canopy. It is recommended the applicant reviews the proposed trees to introduce more diversity for bio-resilience and include large-canopied species to the building frontage.

Water

74 The planning application has included a sustainable urban drainage systems statement. Any technical comments in respect of flood risk, sustainable drainage and water efficiency will be circulated to the Council under a separate cover.

Circular economy

75 Policy SI7 of the Mayor's Intend to Publish London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects. Therefore, a Circular Economy Statement is required in accordance with the GLA guidance.

Transport

Healthy Streets and Vision Zero

76 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 Transport Assessment (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. The TA should be revised to address these issues.

77 The car free nature of this development will contribute towards the Vision Zero approach and is supported.

Vehicular site access and car parking

78 There will be no direct vehicular access from the Transport for London Road Network.

79 The development is car free with the exception of for disabled person's car parking spaces which is in accordance with Mayor's Intend to Publish London Plan.

Trip generation, modal split and public transport

80 The trip generation assessment is acceptable.

81 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

82 The development proposes 224 cycle parking spaces 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 standards set out in the Mayor's Intend to Publish London Plan, further information is required on the gross internal floor area of the one-bed residential units to clarify if they are one or two person units.

83 Further work is required to demonstrate that the cycle parking proposed accords with Chapter 8 of the London Cycling Design Standards. Further, information is required on the type of long-stay cycle parking proposed. At least 5% should be Sheffield Stands at wider spacing for larger / wider cycles. The residential storage area should also be broken down into smaller areas for security purposes.

84 Shower and locker facilities should also be provided for the commercial uses for those members of staff wishing to cycle to work, and this should be secured.

Travel plan, deliveries, servicing and construction logistics

85 It is recommended that a travel plan is secured, monitored, reviewed, and enforced through a Section 106 agreement. A Delivery and Servicing Plan, and a Construction Logistics Plan should be secured by condition.

Local planning authority's position

86 GLA Officers understand that Merton Council planning officers are undertaking an assessment of the submitted planning application, including the viability information, and are targeting a planning committee date in October or November this year.

Legal considerations

87 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

88 There are no financial considerations at this stage.

Conclusion

89 London Plan and the Mayor's Intend to Publish London Plan policies on town centres, offices, social infrastructure, equalities, housing, affordable housing, urban design, play space, fire safety, heritage, inclusive design, energy, air quality, flood risk, sustainable drainage, water efficiency, urban greening, trees, circular economy and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan and the Mayor's Intend to Publish London Plan:

- **Principle of development:** The re-provision 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 re-provision 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.
- **Affordable housing:** The scheme is proposing 0% affordable housing. The residential element of the scheme is proposed to cross-subsidise the re-provision 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.
- **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.
- **Energy:** Further information is required in respect of a number of elements of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.
- **Air quality:** The proposed development is not compliant with air quality policies set out in the London Plan and Mayor's Intend to Publish London Plan, at this stage. The dispersion model should be revisited and the conclusions of the assessment should be presented clearly, following the comments outlined in this report.
- **Urban greening and trees:** A drawing showing the surface cover types and accompanying UGF calculation should be provided. The proposals would result in the removal of 9 trees and the replanting of 15 trees. The current species list for proposed trees planting is limited and does not include species that would grow to achieve a large canopy. It is recommended the proposed

trees are reviewed to introduce more diversity for bio-resilience and include large-canopied species to the building frontage.

- **Circular economy:** A Circular Economy Statement should be prepared and submitted in accordance with the GLA guidance demonstrating the development proposals have integrated circular economy principles as part of the design process.
- **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 Heathy Streets indicators, both within the site and the wider area. A travel plan, deliveries and servicing plan and construction logistics plan should be secured.

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