

PLANNING APPLICATIONS COMMITTEE

26 APRIL 2023

CASE OFFICER REPORT

<u>APPLICATION NO.</u>	<u>DATE VALID</u>
23/P0329	01/02/2023
Site Address:	The White Hart, 144 Kingston Road, Wimbledon, SW19 1LY
Ward:	Abbey
Proposal:	Demolition of existing buildings and construction of part 4/part 5/part 6 storey building comprising a purpose built hall of residence (Sui Generis) to support Wimbledon college of arts, as part of the university of the arts London (UAL) and Class E floorspace (commercial) at ground floor level, together with new areas of public realm.
Drawing Nos:	See condition 2
Contact Officer:	Tim Lipscomb (020 8545 3496)

RECOMMENDATION

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

CHECKLIST INFORMATION

Is a screening opinion required	No
Is an Environmental Statement required	No
Press notice	Yes
Site notice	Yes
Design Review Panel consulted	Yes
Number of neighbours consulted	325
External consultations	Yes
Internal consultations	Yes
Controlled Parking Zone	Yes
Conservation Area	No

Archaeological Priority Zone	No
Public Transport Accessibility Rating	6b
Tree Protection Orders	No

1. INTRODUCTION

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

2. SITE AND SURROUNDINGS

- 2.1.1 The application site fronts onto Kingston Road and is bound to the east by Rutlish Road and the tram tracks to the west. Merton Park tram stop is located to the south of the site. Both Kingston Road and Rutlish Road have a width of 7.5-8m. The site has an area of roughly 0.26ha.
- 2.1.2 The site is effectively in two parts, with the former White Hart public house, with a flat above, occupying the northern third of the site and the southern part being occupied by an MOT garage and workshops. Both of these existing uses have associated car parking and there is no significant soft landscaping within the site.
- 2.1.3 The site is served by two vehicular accesses onto Rutlish Road. There is a public footpath to the immediate west of the site which provides pedestrian access from Kingston Road to the tram stop (referred to in this report as the 'tram path'). There is a yellow box junction on Kingston Road, where the tram line crosses the road.
- 2.1.4 Surrounding uses along Rutlish Road are mostly residential, whilst along Kingston Road there are retail/commercial uses at ground floor with residential uses above. To the west, on the opposite side of the tram tracks, is mostly residential in character. The site is adjacent to both the John Innes Merton Park Conservation Area and the John Innes Wilton Park Conservation Area. Both are detached from the site and are located on the opposite side of the Tramway.
- 2.1.5 There are currently 4 groups of trees on site, incorporating a row of outgrown Leyland Cypress, a small collection of Sycamore, a single Ailanthus and a privet hedge. All these trees are identified as Category B or C (low to moderate value).
- 2.1.6 The built form within the locality is a mix of Victorian terraces on Kingston Road, generally of two storeys with pitched roofs although there are examples of three storey buildings within the terraces. Rutlish Road is characterised by modest two storey properties on the eastern side, while the western side to the south of the site hosts a three storey flatted development with a hipped roof. Further to the west in the conservation area are a range of building types, sizes and styles, including the BT telephone exchange.
- 2.1.7 The site has the following designations and restrictions:
- Controlled Parking Zone (CPZ) – Yes (S1 – Mon-Sat 08:30-18:30)
 - Conservation Area – No
 - Listed Building – No
 - Tree Preservation Orders – No
 - Flood Zone – 1

- Employment Site – Yes
- Classified Road – Yes (Kingston Road)
- PTAL – 6b

3. CURRENT PROPOSAL

3.1.1 The proposal is for the demolition of the existing pub building, MOT garage and workshops and the erection of a building in a courtyard arrangement with frontages onto Kingston Road, Rutlish Road and the adjacent tramline to provide a 271 bedroom Halls of Residence for students attending Wimbledon College of Arts and a ground floor retail unit of 275sqm, along with external amenity space.

Height/design

3.1.2 The proposed building would range in height, with tallest element of the scheme, at the corner of Kingston Road and the tram track, standing at 6 storeys, which then tapers down to 4 storeys towards the southern part of the site.

3.1.3 The proposed building would have a maximum height of approximately 19m, to the corner adjacent to the tram path and Kingston Road, then stepping down in stages, with the southern-most part of the building being approximately 16m in height.

3.1.4 The corner of the building, by the tram path and Kingston Road would form the visual focus of the building, when viewed from Kingston Road. The design of the corner has been formulated over pre-application discussions and forms a chamfered corner to create a landmark building.

Layout

3.1.5 The proposed development would provide 8336sqm of floor space (replacing the existing 774 sqm on site currently).

3.1.6 At ground floor level the building would have frontages onto Kingston and Rutlish Road. The retail unit would occupy the corner of the building by the junction with Rutlish Road and Kingston Road. Admin facilities and communal student facilities, such as project rooms, common rooms, study hub etc, are provided at ground floor level, along with plant, cycle storage and bin storage. The upper floors would accommodate individual bedrooms along with shared student kitchens, incorporating shared lounge spaces.

3.1.7 A main entrance would provide access to the building from Kingston Road, via the Porters Lodge, which would be manned by security 24 hours a day.

3.1.8 The building would be arranged around a central courtyard which would provide communal external amenity space for the students. This area would be landscaped with green areas, seating and 11 trees planted.

Materials

3.1.9 External construction materials include two tones of red facing brickwork; the corner blocks are the darker tone with the setback central blocks lighter. The 'gaps' between the blocks along with the setback upper floors are formed in reconstituted stone. This material is also used to create string courses within the brick blocks. The edges of each brick block are formed with a projecting brick pier in a similar manner to the Telephone Exchange building. More intricate brickwork detailing is proposed at ground floor level to add visual interest.

Layout/public realm

- 3.1.10 The proposal would pull the building line back from the carriageway on the Kingston Road frontage, with a wider pavement created, with street trees added and on-street cycle hoops. The width of the pavement would be increased from 1.7m to between 3.9m and 4.7m.
- 3.1.11 The tram path to the west of the site would be resurfaced and very marginally re-aligned, to ensure a width of 3.0m for the length of the path, (with a width of approximately 5m where the path meets Kingston Road). Retractable bollards would be installed to the junction with Kingston Road to prevent unlawful vehicular access.
- 3.1.12 The application includes improvements and widening of the adjacent tram path, which is currently quite narrow, with a slight bend and no natural surveillance. The path would be widened to 3m, the bend would be removed (to improve sight lines), fencing and lighting to be added.

Highways

- 3.1.13 Changes to highway markings and on-street parking bay layouts is proposed. The two existing vehicular accesses would be closed. The 4 existing parking bays on Rutlish Road would be repositioned, with double yellow lines filling in the remaining kerbside space along Rutlish Road. Servicing is intended to be from Rutlish Road.
- 3.1.14 A pre-booking system for when students move to the halls is proposed. This arrangement will spread out arrivals over 3-4 days and reduce the impact of arrival activity at any one time. There will also be a need for similar management during open days. The servicing space on Rutlish Road will be available for vehicle drop-off/pick-up during this period.

Cycle

- 3.1.15 The application has been marginally amended to change the layout of cycle parking, with some provided in the central courtyard and others provided within the building. A total of 204 cycle parking spaces are proposed, not including the 6 cycle hoops to the frontage. (120 in the courtyard and 84 inside the building).

Sustainability

- 3.1.16 The approach to sustainability is to utilise air-source heat pumps and photovoltaic (PV) panels. The PV panels would be at roof level, on a raised frame which allows for a green roof beneath. Other measures include sourcing 100% of timber and timber-based products legally harvested and traded. All materials for key building elements are encouraged to be responsibly sourced and the development itself has been designed to prevent damage to vulnerable parts of the internal and external fabric in order to minimise the frequency of replacement. The Sustainability Assessment includes a BREEAM pre-assessment noting ratings of 72.05% and 72.55% for the student and commercial parts respectively, demonstrating the 'Excellent' criteria.

Flooding

- 3.1.17 In terms of drainage, a combination of green roofs, bio-retention systems, permeable paving to external areas and attenuation cell are proposed as part of the SuDS strategy. The surface water network will be designed to the greenfield flow rate of 1.3l/s, based on the 1 in 100-year storm event with an additional 40% allowance for climate change.
- 3.1.18 The proposed foul water drainage for the site will connect to a public foul sewer adjacent to the site.

Accessibility

3.1.19 In total, 5.2% of the total student bedrooms will be wheelchair accessible. All accessible rooms will include an accessible shower room and kitchenette and will be accessible via stairs and a lift. The site will be well furnished with seating which have arm rests and back rests to provide a comfortable place for all. The legibility of the proposed scheme will help to orientate people without the need for elaborate signage. Routes around the perimeter of the courtyard will be at least 1.8m wide and will pass the building entrances. There are no significant level changes on the site, access from Kingston Road into the building and through to the courtyard is step free.

Trees

3.1.20 There are currently 10 trees on site (moderate and low quality), which would all be removed to facilitate the proposed, to be replaced with 11 new trees and landscaping in the central courtyard. New street tree planting is also proposed on the Kingston Road frontage and planters will be introduced on the tramline and Rutlish Road elevations. The submitted Landscaping Strategy demonstrates that an Urban Greening Factor (UGF) score of 0.43 will be achieved.

Ecology

3.1.21 The proposal includes the provision of 20 Swift bricks.

Fire Safety

3.1.22 The building has been designed and will be constructed in compliance with relevant fire safety standards and regulations and includes a range of features to enhance fire safety. These include a Category 4 residential sprinkler system, which is designed to provide a high level of protection against fire, a Category L2 fire detection and alarm system, which is designed to detect and alert occupants to a fire as quickly as possible, and adequate refuge provisions, which allow occupants to safely shelter in place if evacuation is not possible

3.1.23 In addition to these safety features, the building also has a simultaneous evacuation policy and three escape stairs, which provide multiple means of escape for occupants in the event of a fire. The external walls of the building will be constructed to achieve Class A2- s1, d0 or better from ground level. This ensures that the walls are able to provide a suitable level of protection against the spread of fire. Adequate fire service vehicle access has been provided to the main entrance of the building to allow for an effective response in case of fire emergency.

Documents

3.1.24 The application is accompanied by the following supporting documents:

- Accommodation Schedule
- Air Quality Assessment
- Archaeological Impact Assessment
- Circular Economy Statement
- Construction Environmental Management Plan
- Construction Logistics Plan
- Covering letter
- Delivery and Servicing Plan
- Design and Access Statement
- Draft Student Accommodation Management Plan
- Drainage Strategy Report including Flood Risk Assessment and SUDS.
- Energy Statement
- External – Daylight and Sunlight Report

- Fire Strategy
- Heritage and Townscape Visual Assessment
- Internal – Daylight Amenity Report
- Land Contamination Assessment
- Landscape Strategy
- Overheating Assessment
- Planning Statement
- Preliminary Ecological Assessment
- Public Consultation Event November 2022 – Flyer
- Statement of Community involvement
- Statement of case – loss of public house
- Student Travel Plan
- Sustainability Assessment
- Transport Assessment
- Tree Survey and Arboricultural Impact Assessment

4. PLANNING HISTORY

- 4.1.1 21/P2565 - Demolition of existing buildings and erection of a part 5, part 4 storey building comprising 56 residential units (Class C3) and commercial units (470sqm), including an internal courtyard podium above servicing areas; and communal amenity space, refuse storage, cycle storage and landscaping. Undetermined
- 4.1.2 17/P0068 - Pre-application advice for re-development of existing public house, light industrial works and car park on Kingston Road to create a retail unit with residential courtyard behind. Pre-app complete.
- 4.1.3 05/P1508 - Installation of a 12.5 metre telecommunications antenna and associated external equipment cabinets containing radio equipment (application for determination as to whether the prior approval of the local planning authority will be required for the siting and appearance of the development) - Prior Approval Granted 06/10/2005
- 4.1.4 03/P2109 - Alterations and extension to the existing building in connection with the proposed use as mot testing station together with the existing use as car repairs garage - Grant Permission subject to Conditions 29/12/2003
- 4.1.5 01/P2181 - Display of 4 x externally illuminated fascia signage and 1 x free standing totem sign - Grant Advertisement Consent 05/11/2001
- 4.1.6 01/P2195 - External alterations to the building with new boundary treatments, new external lighting and modification to car park - Grant Permission subject to Conditions 23/11/2001
- 4.1.7 96/P0323 - Retention of externally illuminated logo sign, fascia signs and double sided hanging sign - Grant Advertisement Consent 24/05/1996
- 4.1.8 92/P0157 - Erection of single storey and rear extensions involving demolition of existing side extension - Grant Permission subject to Conditions 14/04/1992
- 4.1.9 92/P0163 - Display of externally illuminated fascia sign and externally illuminated signs on the flank and splay elevations at first floor level - Grant Permission subject to Conditions 22/05/1992

5. CONSULTATION

- 5.1.1 The application has been advertised by major application notice procedure and letters

of notification to the occupiers of neighbouring properties (325).

5.1.2

In response to the consultation, 21 letters of objection have been received.

The letters of objection raise the following points:

Land Use

- A pub use should be retained. The students provide a strong case for retention of a drinking establishment.
- Retain space is not required in this location and would not likely be successful.

Visual impact

- Building is too tall and would appear out of keeping and overly dominant.
- Other large buildings referred to are setback from the road much more.
- The tram stop is not so significant as to warrant such a tall building.
- Rooftop plant would add to the overall height.
- The view from Hartfield Road would be totally blocked by this proposed building.
- Building line stands forward of neighbouring properties
- The additional height on the North West corner is to create a “Townscape Focus” and a marker for the Merton Park Tram Stop. This is the closest point to the adjacent Conservation Areas and is unnecessary, out of context with the area and is not necessary to mark the Tram Stop in this way.
- Concern that brickwork would be brick slips.
- Adverse impact on nearby Conservation Areas.
- The UAL halls of residence in Peckham is 4 storeys tall and more sympathetic to its surroundings.
- In Plan the building is a U with the very narrow courtyard space facing south, away from the public. This orientation excludes any sense of community between students and Old Merton Park residents. If the courtyard were orientated east it would reduce street “loom” in Rutlish Rd and more visually belong to the community.
- Shopfront design is generic and boring.
- Further landscaping needed to Rutlish Road side.

Construction Process

- Concerned at impact of construction process on residents of Rutlish Road.
- Concern that pre-fabricated modules will need large vehicles (16m+ in length) to be delivered and the erection of cranes to position them.

Sustainability

- All other buildings by UAL have been BREEAM Outstanding, whereas this is the lower level of Excellent – why is this?
- There is no harvesting of rainwater and no reuse of grey water in the building which is an unexpected surprise and a disappointment for a modern building.

Transport/Highways

- Swept path analysis shows that vehicles would stop in the middle of Kingston Road and reverse into Rutlish Road – this could create congestion. A limitation

on the hours of construction vehicles accessing the site should be imposed. Also shows vehicles mounting the kerbs to make the manoeuvres.

- Access should be from Kingston Road not Rutlish Road.
- Traffic Marshalls will start their working day at 7am to ensure that no vehicles are parked or stacked in the vicinity of the scheme. – And how will they do this?
- How will they prevent stacking when vehicles arrive – to say they will do so without a plan on how is meaningless.
- Access points will be designed to avoid queuing traffic adjacent to access points. – How?
- There will be rigid control of vehicles entering and leaving the compound to prevent congestion on the approach and exit roads. How – will they be prevented from entering and required to continue along Kingston Road?
- If the footpath is closed, then it should not be necessary for vehicles to be unloaded from the roadside by Forklift and this should be banned.
- Construction vehicle movements should occur on site.
- Concerns over parking pressure.
- No parking for the retail unit would cause problems.
- The scheme is described as Car Free with no on site parking areas provided but no acceptable attempt has been made to deal with deliveries, disabled and visitor vehicle movements and parking which will put immense pressure on the local road network with very limited additional capacity
- Blue Badge (disabled), delivery and service station bays should be included on-site.
- There will be 14 accessible studio units for wheelchair users (5% of the total units) which is good to see but, if they have a need for a vehicle, then they will park on the street.
- 33 vehicle movements will require to undertake a U-turn into Charles Rd or, even worse, proceed to the south end of Rutlish Rd in order to move in a forward direction out of the area. This will increase the risks to pedestrians and cyclists
- Trees and on-street cycle parking bays are proposed which will affect visibility for pavement, tram and road users. Also building may be too close to the trees to maintain them in the future.
- No benefit from the proposal towards local cycle network.
- The site is being marketed as “car-free” but the reality is that the students will be frequented by car drivers and delivery vans will be in abundance.
- Suggestion that improvements to the highway by way of addition cycle paths on Kingston Road should be secured.

Neighbour amenity

- Loss of privacy.
- Loss of light.
- The light assessment focuses on the acceptability of the resultant light levels but does not focus on the huge reduction in light levels that neighbours would experience
- Concern that students may return late at night and disturb residents.

Other Matters

- A number of comments welcomed the use as student accommodation and the widening of the footpath.
- Query whether Abbey Recreation Ground would be available to future occupants.

- Very similar to previous applications for the site that were rejected and opposed by local residents.
- Concerns over additional flooding
- Other more suitable sites could be used.
- Concern over impact on local infrastructure
- Increased building height would trap air pollution.

5.1.3 2 letters have been received expressing support for the following reasons:

- It meets a local need for student housing
- It deals satisfactorily with the issue of parking, which was a concern with previous developments
- We like the overall design, so that the storeys increase towards Kingston Road (for the record, we have no problems with the height, because of the staggered storeys and the fact that storeys themselves are slightly lower than standard height)
- The landscaping (although we would like to see more of this)
- The potential for sound dampening of traffic on Kingston Road and the tram line (although that's not particularly noisy)
- The fact that the entrance is on Kingston Road rather than Rutlish Road
- The fact that prefabrication work for much of the building will take place off site.

5.1.4 **The John Innes Society (16/03/2023)**

This site is in the John Innes Society's Area of Benefit and although we wish to see it brought back into use, we do have some reservations about these proposals.

1) Changes to the NPPF are giving greater weight to preserving the character of an area. There is anxiety within the community that the bulk, massing and design of the taller part of the block will present as a landmark which overwhelms the approach to John Innes' Merton Park Garden Suburb. It will certainly look very different, but the question is will it be sufficiently in sympathy with its surroundings to preserve and enhance them.

2) Thames Water lodged detailed requirements on the previous application 21/P2565, because they said the proposals were located within 5m of their strategic water main, and within 15m of their strategic sewer. They also said there were water mains crossing or in close proximity to the site and they do not permit construction within 3m of water mains. They asked for a number of investigations and conditions about piling and construction methods. As at the time of writing we cannot see that Thames Water have sent in any representations on the current proposals so do they expect their requirements to be carried forward to this application? There is no point in granting permission for a development which cannot be built without substantial amendment. JohnInnesSociety.org.uk In receipt of donations from

3) Although the Air Quality officer has given his approval, the fact remains that air quality monitoring near this site shows it to be one of the Borough's worst blackspots. Looking at the internal layout of the bedrooms, those fronting onto Kingston Road will have only one aspect and window, directly over the road. We would respectfully suggest that only bathrooms and kitchens should be located on this frontage, to safeguard the health and wellbeing of the future occupants.

4) We agree with the Urban Design Officer that using up so much of the small courtyard space with cycle racks, is poor planning. The site is at a busy traffic

junction, making the sheltered outdoor space especially valuable for the wellbeing of the students.

5.1.5 **The Wimbledon Swift Group**

Highlighted that this development provides a golden opportunity for local Swifts but sets out that the number of Swift bricks proposed (20), should be increased: In order to fully utilise the potential of buildings to support endangered bird species, it is imperative that installation of swift bricks should follow best practice guidance on quotas and arrangement of swift bricks (1:1, swift bricks to residential units, and one swift brick per six square metres on commercial buildings).

5.1.6 **Campaign for Real Ale (04/03/2023)**

Summary of comments

- No objection to the building but the public house use should be preserved.
- There has been historic pub use on the site, as there has been a White Hart pub here since at least the start of the 18th Century, and possibly even the 17th Century.
- The current building dates from only 1958, the previous incarnation having been destroyed during WWII.
- There are no other pubs within walking distance.
- The fact that a business that operated the pub over eight years failed, does not make public house use on the site unviable.
- It is open to the Council to commission an independent viability report, at the applicant's expense, into pub use on the site.
- In short, this application does not meet the requirements of either Policy DMR5 of the Merton Plan, nor the requirements of Policy HC7 Paragraph 7.7.7 of the adopted London Plan. If you approve this change of use as it stands, it will give the green light to any developer to play the long game by allowing them to close a pub that it has bought and leave it to deteriorate for a number of years in order play the non-viability card to get change of use agreed.

5.2 Internal Consultees:

5.2.7 **LBM Transport Planning (16/03/2023):**

Proposal

This planning application relates to the demolition of existing buildings and construction of part 4/part 5/part 6 storey building comprising a 271-bedroom purpose-built Halls of Residence to support Wimbledon College of Arts ("WCA") which is part of the University of the Arts London ("UAL") (sui generis) and 275sqm Class E floorspace on ground floor.

The site is bounded by Kingston Road to the north, Rutlish Road to the east and the Tram lines to the west. Kingston Road forms part of the Strategic Road Network (SRN) for which TfL is the traffic authority.

Controlled Parking Zone (S1)

The site is located within the Merton Controlled Parking Zone (CPZ), Subzone S1, where restrictions operate between 08:30 and 18:30, Monday to Saturday. Rutlish Road adjacent to the site nearby provides a mix of permit holder bays and pay & display.

The site has a Public Transport Accessibility Level (PTAL) rating of 6a which indicates excellent accessibility to public transport routes.

Car Parking

Halls of Residence

The Proposed Development is car-free. It is a strict condition of the tenancies which the students enter into when they take their accommodation that they are not entitled to bring a car into the area surrounding the accommodation. This restriction will be set out in the Student Management Plan that is submitted with the planning application and compliance with this plan can either be controlled by condition or the S106 Agreement. Notwithstanding this legal restriction there should be no need whatsoever for any students to make use of cars given the very close proximity of the Halls of Residence to WCA and the excellent public transport connectivity with the rest of London.

Retail

As the site is located in an area of high PTAL level 6b the Retail element would be car free.

Cycle Parking

Student Accommodation - Long Stay – 204 ; Short stay – 7

Retail – Long stay – 2; Short Stay 12

The cycle parking provision satisfies the London Plan Standards.

Trip Generation

The trip generation assessment indicates that the proposed development would be expected to generate 337 reduced two-way vehicle movements across the day, with 23 reduced two-way vehicle movements in the AM peak hour period and 12 reduced two-way vehicle movements within the PM peak hour period.

The trip generation exercise has demonstrated that traffic generation resulting from the proposed scheme will be less compared with the existing uses. It is concluded that the proposed development will have a positive effect on the local highway network.

Student Travel Plan

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

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

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

Recommendation: Raise no objection subject to:

- Student management plan secured via section 106 process.
- Cycle parking (secure & undercover) as shown maintained.
- A sum of £2,000 is sought to meet the costs of monitoring the travel plan over five years, secured via section 106 process.
- Demolition/construction logistic plan (including a construction management plan in accordance with TfL guidance) should be submitted to LPA for approval before commencement of work.

In addition, a condition limiting service vehicles to be no more than 8m in length has been requested.

5.2.8 **LBM Highway Officer (27/02/2023)**

Highways comments are

H1, H2, H3, H5, H10, H13
INF8, INF9, INF12

Whilst they have produced a CLP we would still require one under conditions. The Transport Planning Team will confirm regarding their proposal that delivery or construction vehicles to reverse from Kingston Road, as highways view is that no reversing will be allowed from Kingston Road, also note that Kingston Road has a 20mph speed limit.

5.2.9 **LBM Tree & Landscape Officer (28/03/2023)**

The matter of green walls was raised by the Greater London Authority in their comments on the current planning application 22/P3620:

99. London Plan Guidance on Fire Safety restricts the use of combustible materials, limiting the use of green walls where they form part of the external wall of a building. The proposed urban greening should therefore be reviewed against this guidance and updated as appropriate. Where this review finds it necessary to remove a green wall, opportunities should be sought to make up any reduction in the UGF by improving the quality or quantity of greening across the wider masterplan. For further information on combustible materials see [here](#).

We need to be sure of the calculations and that the UGF is at least 10%.

The Preliminary Ecological assessment does not include the solar panels and any maintenance paths under or around the panels:

Green wall: full details of 12m² of green wall, including the location, design, method of construction and a planting scheme shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved prior to the completion and occupation of the development.

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

Schwegler insect house: full details of the location of a minimum 10no. Schwegler insect houses shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved following the completion of the development or prior to the occupation of any part of the development, whichever is the sooner.

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

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

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

Swift bricks: full details of the type and location of the 20 no. Swift bricks around the building as recommended in the in the 'preliminary ecological assessment' shall be submitted to and approved in writing by the local planning authority and shall be installed as approved prior to the completion of the development, and shall be permanently retained in-situ and be maintained to a satisfactory condition thereafter.

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

The ecology report discusses the use of an intensive green roof, whereas the landscape report discusses this and an extensive green roof. Extensive green roofs offer much less in terms of biodiversity, and it would be good if the applicant could stick to using an intensive green roof. However, they are proposing to use green roofs with PV panels. It would be good if the roof plan could be updated to show which

green area is which in order that we may have a better understanding of the proposed areas.

The landscape strategy does mention green walls, but then mentions a modular system or climbers rooted in soil. All a bit vague. I think there are greater biodiversity benefits to be had with a green wall, particularly since this is referred to in the ecological assessment and their calculations for the Urban Greening factor. Climbers can be easily added to the general planting across the site.

5.2.11 **LBM Urban Design Officer (28/03/2023)**

This is an improvement. It is essential we keep our eye on the ball with the quality of the detailing right through to completion as this is a student hall of residence and not a prestige office building so there may be more pressure to cut costs along the way.

5.2.12 **LBM Urban Design Officer (24/02/2023)**

- There is disparity in the quality of the CGI images relating to the colour of the brickwork. A higher contrast between the two shades of brick is necessary from experience to ensure it is easily distinguishable. Therefore, this needs to be conditioned that samples need to be agreed on site.
- There is also some disparity as to whether there are 4 or 5 levels of soldier course bricks as part of the ground floor fascia. Four courses is better and less heavy. This should be clarified.
- Whilst the overall look is of a good quality, the longer views do show the building as possibly rather plain. Up close, the angled vertical bricks and the soldier course bricks simply add to the mass of bricks and it likely to become overbearing - look at the St. Georges office buildings in Wimbledon from the 1980s (almost LEGO like).
- Whilst this proposal certainly does not look like LEGO, I feel there needs to be more relief to the brickwork to complement the panels adjacent to the windows - which also need to be approved prior to installation.
- I would like to see the adding of more texture and possibly variety in the brick colour, and/or some limited introduction of another material - glazed tiles are an obvious choice but there may be other alternatives.
- The architect needs to address this, and there remains more scope to make the building more of a landmark on the corner in this respect too.
- Internally it is very important to maximise active frontage to the tram line and there is a long element of dead frontage for the water tanks/sprinklers, yet the most of the cycle store is outside. I know this was discussed at DRP, but I feel this balance is not right. More space in the courtyard for relaxation and more of the cycles under cover with appropriate lighting, visibility and security, and a slight rethink on a more efficient use of space for this element of the plant.

5.2.13 **LBM Waste Management (17/03/2023)**

I note the transport assessment have dealt with the access issues. As this is a commercial unit, I believe the waste collection arrangement are more flexible and will utilise services that meets available access/space.
No further concerns from me.

5.2.14 **LBM Waste Management (02/03/2023)**

LBM does not offer waste collection as part of Business rates, we only advise or recommend waste management arrangement for commercial premises.

Proposal for a commercial unit development/ conversion, LBM recommends for applicants to identify the type of business(es) intended and identify quantity of proposed waste generation – this has been satisfied

LBM would recommend for a planned waste storage and collection arrangement to be in place – this has been satisfied.

An obvious concern with the waste management proposal is with access for an average standard sized waste collection vehicle – clarity is required. Applicant has proposed the collection of 32x 1100L bins per week or 16x 1100L bins biweekly. There are no concerns with the storage arrangement, noting the restricted access on Rutlish Road clarity is required with access management of a standard sized waste collection vehicle.

5.2.15 **LBM Environmental Health (Air Quality) (13/03/2023):**

Air Quality

The applicant has submitted an Air Quality Assessment report ref: J10/13967A/10/1/F3, dated 10 January 2023 and produced by Air Quality Consultants.

Air quality conditions for future student residents of the proposed development have been shown to be acceptable, with concentrations below the air quality objectives throughout the site.

Heating and hot water for the development will be provided by Air Source Heat Pumps (ASHPs). These do not produce emissions to atmosphere. As such, the proposals are considered air quality neutral from a building emissions perspective.

The assessment has demonstrated that emissions from the routine testing of the proposed emergency diesel generator within the development, will have a negligible impact on air quality conditions at existing receptors, and at receptors within the development itself.

The building and transport related emissions associated with the proposed development are both below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.

Demolition and construction activities can result in temporary effects on dust. The assessment has defined appropriate mitigation measures to reduce the level of dust.

The applicant has submitted a Construction Environmental Management Plan prepared by Hollybrook (dated 9/01/2023). The report included a Dust and Air Pollution

Management Plan that has highlighted mitigation measures to control fugitive dust emission during the demolition and construction phases.

Based on the information above, I have no objections subject to the following conditions:

Condition –

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

Reason: To manage and prevent further deterioration of existing low quality air across London in accordance with London Plan policies GG3 and S11, and NPPF 181.

5.2.16

LBM Environmental Health (potentially contaminated land) (20/02/2023)

With regards contaminated-land we recommend three conditions, the first two, subject to prior agreement:

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

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

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

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

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

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

5.2.17

LBM Environmental Health (noise and disturbance) (20/02/2023)

Further to your consultation in relation to the above planning application and having considered the information submitted I make the following comments and observations regarding noise and nuisance.

- 1) Noise levels, (expressed as the equivalent continuous sound level) LAeq (15 minutes), from any external plant/machinery across the site shall not exceed LA90-10dB at the boundary with the closest residential property.
- 2) 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 Impact Assessment Report Reference 12179.RP01.EBF.1, dated 19 January 2023 shall be implemented as a minimum standard for the development. A post construction compliance noise survey shall be conducted and any remedial measures implemented should the submitted criteria fail to be achieved.
- 3) Any external lighting shall be positioned and angled to prevent any light spillage or glare beyond the site boundary and in accordance with Institution of Lighting Professionals, The Reduction of Obtrusive Light Guidance Note 01/21.
- 4) The construction environmental management plan, produced by Hollybrook dated 9th January 2023 shall be adhered to for the duration for the development.

5.2.18

LBM Flood Risk and Drainage Officer (14/04/2023):

The submitted drainage strategy by Walsh Engineers (ref: 5648-WAL-RP-C-0300-04) is acceptable and we have no objections to the scheme on basis the development is implemented in accordance with this.

While the site is not at high risk of flooding, it should be noted that historically there has been some surface water ponding issues directly fronting the site on Rutlish Road and at the junction with Kingston Rd. The final levels and layout should consider this issue and look to improve matters.

The drainage design and modelling has been undertaken using MicroDrainage software, for a site area of 2620m² (with 2557m² being impermeable) and a 1 in 100-year storm with an allowance of 40% for climate change it is estimated that 165m³ of storage will be required in order to reduce the peak flow runoff to 1.3l/s.

The proposed development will implement a sustainable drainage strategy that will include green roofs, below ground storage tanks and permeable paving designed to the required standards.

Condition:

The development hereby permitted shall not commence until details of the final design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the London Plan, Merton's SuDS policies and SPD and the national Non-Statutory Technical Standards for SuDS, and the NPPF. The required drainage details shall include:

- a) The final solution should follow the principles set out in the approved drainage strategy by Walsh Engineers (ref: 5648-WAL-RP-C-0300-04) . Where infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of

- 1.3l/s which is equivalent to the pre-development Greenfield run-off and provide storage/attenuation of no less than 165m³.
- b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Where infiltration is proposed, confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
 - c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
 - d) Details of drainage management responsibilities and maintenance regimes for the drainage system.

Details shall be provided of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the appropriate standards for Surface Water Drainage SuDS and to ensure that the final drainage design does not increase flood risk on or off site in accordance with NPPF 167&169, London Plan (2021) policy SI 12, SI 13, Merton CS (2011) policy CS16 and Merton SPP (2014) policies DMF1 and DMF2.

Condition:

Prior to the occupation of the final phase of development, a Site-wide Sustainable Drainage Management and Maintenance Plan for the lifetime of the development (including a management and maintenance plan for on-site watercourses, SuDS and culverts) shall be submitted to and approved in writing by the Local Planning Authority.

The sustainable drainage management and maintenance plan shall include as a minimum:

- a) Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company;
- b) Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime. The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development with NPPF (2021) paras 167&169, London Plan (2021) policy SI 12, SI 13. Merton CS (2011) policy CS16 and Merton SPP (2014) policies DMF1 and DMF2.

Informative:

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

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

5.2.19 **LBM Planning Policy (Green infrastructure) (16/03/2023):**

Protected Species

I have reviewed the submitted Preliminary Ecological Appraisal and the methodology, findings and recommendations of the survey works described, are sound.

I would recommend that suitably worded planning conditions and/or informatives are attached to any planning permission, to ensure that the mitigation and enhancements recommended in part 7 of the submitted Preliminary Ecological Appraisal, are delivered.

Urban Green Factor (UGF)

In page 22 of the submitted Landscape and Public Realm Strategy it is demonstrated that the proposals will achieve the UGF target score of 0.4.

A suitably worded planning condition should be attached to any planning permission to ensure the delivery and maintenance of the landscaping features that contribute to the UGF score.

Biodiversity Net Gain (BNG)

The government's statutory 10% target on BNG is due to come into force in November 2023 but the current Development Plan policies and the NPPF (and the council's draft Local Plan) currently encourage the enhancement biodiversity.

The submitted documents are silent on this matter but, as the landscaping features in the Landscape and Public Realm Strategy, that would be secured via a planning condition, would result in BNG and therefore the proposals successfully address this policy matter.

5.3 External Comments

5.3.20 **Metropolitan Police – Secured by Design (24/02/2023)**

Design considerations

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

Measures already discussed

- The clients preference would be to have the main entrance door as an automatic opener during daytime hours (to assist with cycle access) and locked

at night with fob controlled access for those wishing to gain access after these hours.

- The secondary door leading to the courtyard area should be fob controlled at all times. Access to each core should also be fob controlled and limited to only those residing 0 50 100 150 200 250 300 350 308 246 109 75 66 63 42 36 27 27 Abbey Ward within that specific core. This will provide two layers of security and prevent tailgating into the residential areas.
- The communal doorset to be SBD approved, tested and certificated or an agreed equivalent. It should have an audio/visual access control panel. No Trade button is permitted.
- All doorsets allowing direct access into the flats, e.g. front and patio doors, as well as easily accessible windows and balcony doors should be SBD approved, tested and certificated or an agreed equivalent.
- With the huge rise in parcel thefts, the parcel room is welcomed.
- The concierge should ideally be 24 hours.
- Windows facing the courtyard to have grills to prevent objects being thrown out.
- Doors that access the roof are for maintenance only and will be locked at all times.
- The gates to the south of the development should be designed to prevent them being left open and misused, allowing unwanted access into the courtyard.
- Any perimeter fencing should be a minimum of 2.1 metres in height.
- Any metal louvered doors should be steel not aluminium. Aluminium is easily bent or forced. Wire mesh should be attached to the rear of the door to reinforce and prevent rodents gaining access.
- Residential cycle and bin stores should be restricted to residents only by means of encrypted access control but have a thumb turn exit to prevent being accidentally locked in. The doors should be tested and certified to a minimum of PAS24: 2022, outward opening with self-closing and locking mechanisms, and preferably single leaf complemented by the correct lighting and CCTV.
- All retail and residential areas should be kept separate.

Further recommendations

- 'Hit and Miss' or 'Dog Toothed brickwork' which protrudes should be avoided on the ground floor as this provides a climbing aid to the upper floor balconies and provides areas to conceal weapons or drugs.
- I would recommend a CCTV system to cover at least the entry and exit points and the cycle parking areas. This should be designed and installed by be a contractor and a certificate confirming that the CCTV installation is compliant with BS 7958:2015 CCTV management and operation and meets the requirements of GDPR. The contractor will also be required to issue an NSI or SSAIB certificate of compliance.
- Lighting across the entire development should be to the required British Standards, avoiding the various forms of light pollution (vertical and horizontal glare). It should be as sustainable as possible with good uniformity. The lighting should also meet the current council requirements.
- A crucial factor in the success of any development will be the ongoing management and maintenance implemented by the managing agent especially the shared communal areas.

As with any development these recommendations are not exhaustive and further consultation would be encouraged once the detailed design stage is reached. I believe this development could achieve SBD accreditation when completed, providing the above SBD security requirements have been met.

Conclusion

In conclusion this development has a complex design with a mixed use where crime prevention measures should be unitised to the full. I have had a positive input from the applicant and would look forward to working with them on this project.

Recommendations

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

Suggested two part condition wording:-

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

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

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

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

5.3.21

Thames Water

No comments received. However, comments in relation to the previous application 21/P2565 were as follows:

Recommend conditions in relation to:

- Piling method statement
- No construction within 5m of water main

Informative in relation to:

- groundwater risk management.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes.

5.3.22

Transport for London

Site Location and context

The site is bound by Rutlish Road to the east, The A238 Kingston Road to the north, Tramway network to the west and residential buildings to the south. The site of the proposed development is on the A238 Kingston Road, which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The closest section of the Transport for London Road Network is the A24, approximately 600 metres east. The proposal is adjacent to the London Trams network. Merton Park Tram Stop is accessible within 50m of the site, providing 12 trains per hour westbound to Wimbledon and 12 trains per hour eastbound to Beckenham Junction and Elmers End. The site has a Public Transport Access Level (PTAL) of 6b, on a scale ranging from 0 to 6b where 6b represent the highest access to public transport.

Healthy Streets

TfL strongly supports the proposal to improve the footway width on Kingston Road in line with London Plan policies T2 (Healthy Streets) and D8 (Public realm). Trees are proposed on the A238 Kingston Road by the pedestrian crossing. The provision of additional greening on the SRN is supported in line with TfL's Healthy Streets indicators and London Plan policies G1 (Green infrastructure) and GG3 (Creating a healthy city). As set out in TfL's pre-application advice letter, the final design of public realm works on the A298 Kingston Road should be secured by condition and discharged in consultation with TfL and London Trams (LT) to agree on sightlines, and should include the tree types proposed.

The existing low wooden knee fencing on the northern section of tram path is likely to be insufficient to protect path users/residents or the tramway. A Section 106 contribution will need to be secured to cover the cost of replacement fencing in line with London Plan policies T3 (Transport capacity, connectivity and safeguarding) and T4 (Assessing and mitigating transport impacts). The detail of the replacement fencing should be included as part of the public realm design works to be secured by condition and discharged in consultation with TfL to ensure the replacement fence will not impact the operation of the Tramway in line with London Plan policies T3 (Transport capacity, connectivity and safeguarding) and T4 (Assessing and mitigating transport impacts). The responsibility of this path and maintenance requirements going forward needs to be discussed and agreed between LT and the Council.

Infrastructure protection and construction

There must be no adverse impact on tram operations, customers or assets as a result of the development or construction. The path between the site and the tram line provides an important link from Kingston Road to Merton Park Tram stop. This access will need to be maintained during construction with appropriate public protection measures in place to ensure pedestrian safety.

TfL's pre-application advice letter set out that new windows (internal lighting) and external lighting at ground/first floors on north and north-eastern face of building could affect Croydon-bound tram drivers' ability to properly see the signals. This may require design changes or planning conditions such as requiring permanent matte glazing. A glare and glint study will be required to understand whether the windows, metalwork etc. could cause the signal to be unreadable at various times of day / year / weather conditions. TfL requests this is secured by condition and discharged in consultation with TfL prior to construction commencing in line with London Plan policies T3 (Transport capacity, connectivity and safeguarding) and T4 (Assessing and mitigating transport impacts). This is necessary to ensure the provision of any mitigating measures that may be reasonably needed to ensure visibility of the signal head.

A Demolition Management Plan and Construction Method Statement/Construction Logistics Plan should be secured by condition and discharged in consultation with TfL prior to demolition commencing in line with London Plan policy T7 (Deliveries, servicing and construction).

The developer must continue to liaise with London Trams and TOL prior to works commencing.

Cycle parking

206 long stay and 7 short-stay Cycle parking spaces will be provided in accordance with London Plan policy T5 (Cycling) minimum standards.

The long stay cycle store is proposed within the site's internal public realm space. Cyclists will enter the site via the main entrance on Kingston Road, which is supported in line with TfL's London Cycling Design Standards (LCDS) guidance. A further 2 long-stay and 12 short stay spaces will be provided for the retail unit proposed. London Plan and LCDS compliant cycle parking should be secured by condition.

Car parking

The development is proposed to be car free except for one disabled bay in line with London Plan policy T6 (Car parking), which is welcome. The disabled parking bay is proposed on Rutlish Road. This should be secured by section 278 agreements with the Council. In addition, occupiers of the development should be prevented from accessing on street parking permits.

Servicing

On-street servicing is proposed from Rutlish Road with existing parking bays on Rutlish Road re-organised to provide an extended length of double yellow line suitable for servicing. The proposal to service the site entirely from Rutlish Road rather than Kingston Road is supported in line with London Plan policy T7 (Deliveries, servicing and construction).

A full Delivery and Servicing Plan (DSP) should be secured by condition in line with London Plan policy T7 (Deliveries, servicing and construction).

5.3.23

Historic England (Archaeology)

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

investigation.

I therefore recommend attaching a condition as follows:

Condition

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

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

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative

Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015

5.3.24 **London Fire and Civil Defence Authority**

No comments received

5.3.25 **Design Review Panel (DDRP)**

The proposal went before the DRP in August 2022 and was given a unanimous green verdict. The detailed comments on the DRP are below:

Item 1: 144 Kingston Road

The Panel were impressed with both the presentation and how the proposals had progressed for the site and felt that the current design and uses sat better with the site and context than previous schemes. The Panel were comfortable with the scale, massing and height and how the building sat within the townscape. The set-backs from the Kingston Road side and tram line side were welcomed. It was felt that the architecture was well developed and the brick modelling good. The Panel raised a

number of points where the design would benefit from further consideration to further enhance what they felt was already a good scheme.

The Panel were uncomfortable about the gabled parapets and their 'fake' nature, especially as the PV panels behind would sit on a flat roof but at the same angle as the gables. The implication being that they should be removed or be genuine roofs that the PV panels would sit upon. There was also some concern that the gables might not fully conceal the plant on the roof.

There was some divergent opinion on whether the different coloured brick was necessary to pick out the vertical elements of the building – this being liked by some and was felt unnecessary by others as the articulation of massing and brick detailing was considered enough to provide architectural variety.

The entrance sequence was liked and considered well thought out. The applicant was however, encouraged to consider out-of-term use of the studio space so that it didn't become dead frontage and was well used and successful. Some form of community use was suggested.

There was a lot of discussion about the courtyard and landscape design. The maintenance strategy for these spaces was unclear and must be considered. The design for the courtyard was welcomed and it was felt to have the potential to work well. However, it was suggested that only one line of trees might be necessary and the proposed species may benefit from reconsideration away from silver birch to an alder or robinia to get taller fastigate growth. It was also suggested that more seating would be beneficial. It was felt that the free-standing cycle parking should not initially be included and this would allow for more flexibility in the use of the space. Concerns were also raised over how the courtyard links with the route to the south. Overall, further work was needed on landscaping, particularly regarding the courtyard.

The cycle parking was also discussed and the Panel felt it was important that the applicant investigate further how the design can encourage better use of the covered cycle parking. Clear views into the parking area were considered very important and it was suggested that glazing was used on the courtyard facing elevation.

The boundary between the tram path and elevation was considered a little fussy with a raised planter and this may make maintenance difficult. A simpler approach should be considered that maintained some form of defensible space.

The Panel felt that the applicant might struggle to achieve the required Urban Greening Factor with the number of trees proposed and that there was more potential for tree planting around the site and on the street, though understood the limitations posed by underground utilities. The panel asked whether there had been an embodied carbon calculation.

They felt that the main corner entrance area had potential for more tree planting and seating to reinforce its focal point role. On the other corner it was felt that the servicing strategy for the retail unit needed more clarity as well as there needing to be a strategy for how students belongings etc. were to be dropped off/collected at the beginning and end of term/year as this was likely to generate vehicular traffic, there being no on-site parking at all.

Internally the layouts were felt to be generally well thought out however it was felt that there could be better separation between the communal and private areas regarding the positioning of the bathrooms. Whilst the stair cores seemed to have good amounts of natural light, the corridors were long and not well lit. The applicant was encouraged to explore means of getting natural light into these corridors. Finally the Panel recommended the applicant produce street-level CGI images to demonstrate the new

building in its context. The Panel were unanimous in giving the proposals a GREEN verdict.

Verdict: GREEN

6. **POLICY CONTEXT**

List of relevant planning policies

National Planning Policy Framework (2021)

- Chapter 2 Achieving sustainable development
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

London Plan 2021

- Policy SD6 Town centres and high streets
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D13 Agent of Change
- Policy D14 Noise
- Policy H2 Small sites
- Policy H15 Purpose-built student accommodation
- Policy S3 Education and childcare facilities
- Policy E9 Retail, markets and hot food takeaways
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC7 Protecting public houses
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI 1 Improving air quality
- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 5 Water infrastructure
- Policy SI 7 Reducing waste and supporting the circular economy

- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.1 Residential parking
- Policy T6.3 Retail parking
- Policy T7 Deliveries, servicing and construction

Merton Core Strategy (2011)

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

Merton Sites and Policies Plan (2014)

- DM R2 Development of town centre type uses outside town centres
- DM R6 Culture, arts and tourism development
- DM H5 Student housing, other housing with shared facilities and bedsits
- DM C1 Community facilities
- DM C2 Education for children and young people
- DM E3 Protection of scattered employment sites
- DM E4 Local employment opportunities
- DM O2 Nature Conservation, Trees, hedges and landscape features
- DM D1 Urban design and the public realm
- DM D2 Design considerations in all developments
- DM D4 Managing heritage assets
- DM D7 Shop front design and signage
- DM EP1 Opportunities for decentralised energy networks
- DM EP2 Reducing and mitigating noise
- DM EP3 Allowable solutions
- DM EP4 Pollutants
- DM F1 Support for flood risk management
- DM F2 Sustainable urban drainage systems (SuDS) and; Wastewater and Water Infrastructure
- DM T1 Support for sustainable transport and active travel
- DM T2 Transport impacts of development
- DM T3 Car parking and servicing standards

- DM T4 Transport infrastructure
- DM T5 Access to the Road Network

Supplementary planning considerations

- National Design Guide – October 2019
- Draft Merton Local Plan
- GLA Guidance on preparing energy assessments – 2018
- London Environment Strategy - 2018
- Mayor’s Air Quality Strategy - 2010
- Mayor’s SPG – Sustainable Design and Construction 2014
- Mayor’s SPG – Character and Context 2014
- LB Merton – Air quality action plan - 2018-2023.
- LB Merton - Draft Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD) 2018
- LB Merton - Local Development Framework - Tall buildings Background Paper 2010
- Merton’s Waste and Recycling Storage Requirements – A Guidance for Architects

7. PLANNING CONSIDERATIONS

7.1.1

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

- Principle of development
 - *Loss of public house*
 - *Loss of employment land*
 - *Proposals for new retail shop/commercial Class E floor space*
 - *Contribution towards housing targets*
 - *Small Sites*
 - *Merton’s five year land supply*
 - *Provision of student accommodation*
 - *Conclusion on principle of development*
- Affordable Housing
- Design (character and appearance)
 - *Massing and heights*
 - *Layout*
 - *Design and appearance*
 - *Design Review Panel comments*
- Urban Greening Factor and trees
- Impact on neighbouring amenity
 - *Daylight and Sunlight*
 - *Privacy and overlooking*
 - *Noise/disturbance*
 - *Conclusion on impact on neighbouring amenity*
- Standard of accommodation
- Inclusive design and accessible accommodation
- Transport, parking and cycle storage
 - *Conclusion on impact on neighbouring amenity*
 - *Car Parking*
 - *Cycle Parking*
 - *Deliveries and servicing*
 - *Trip Generation*
 - *Construction process*
 - *Adjacent tram path*

- *TfL comments*
- *Conclusion on transport matters*
- Sustainable design and construction
- Air Quality and potentially contaminated land considerations
- Flood risk and drainage
- Biodiversity
- Secure by Design considerations
- Fire Safety

7.2 Principle of development

7.2.1 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.

Loss of public house

7.2.2 Policy HC7 of the London Plan sets out that:

“Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.”

7.2.3 Policy DM R5 of Merton’s Sites and Policies Plan 2014 states that proposals that will result in the loss of a public house will only be permitted where all the following are met:

- The applicant can demonstrate to the council’s satisfaction that the public house is no longer viable (clarified in the justification (para 1.86) that economic viability of the pub as a business is justified through marketing), and
- There are alternative public houses located within the local area (clarified in the justification that this means the presence of another viable public house within 800metres).

7.2.4 This application submission proposes the loss of the White Hart pub. The application is accompanied by marketing information to set out that the existing building is not fit for reuse due to its condition and configuration.

7.2.5 Under the previous application on this site, 21/P2565, the submission set out that the rental value would be negative for several years and the loss of income suffered over the period would not be recoverable. The former public house had a long history of rent arrears, beginning in 2009 due to ‘difficult trading conditions’ and running until closure in 2012. At various points, the tenant was in rent arrears of up to £15,000. The licensee eventually initiated liquidation in May 2015.

7.2.6 The key issue is that the extent of refurbishment/rebuilding works to make the building lettable could not be recouped from the rental value, rendering the existing pub unviable.

7.2.7 In terms of alternative public houses in the local area, within the policy threshold of 800m, there are several other public houses, including:

- Prince of Wales, 98 Morden Road (500m);
- The Garratt and Gauge, 18 Hartfield Road (657m)
- the Wibbas Down Inn, 6-12 Gladstone Road (534m);
- the Old Frizzle, 74-78 the Broadway (608m);
- The Horse and Groom, 131 Merton High Street, (692m)
- The Leather Bottle, 277 Kingston Road (637m)
- O'Neill's Wimbledon, 66 the Broadway (604m).

7.2.8 Whilst it is noted that the majority of these pubs are in Wimbledon Town Centre, it does demonstrate that there are other alternative public houses in the locality. The submission is considered to have met the policy requirements in this regard.

7.2.9 The application sets out that justification for the pub's loss can be summarised as follows:

- Eight years vacancy and thus no contribution to the community for a significant period of time;
- Historic poor revenue sales and high costs of refurbishment making it unattractive to the market;
- General subdued and suppressed market across the licensed pub industry;
- History of anti-social behaviour associated with its use; Hibernian Developments Wimbledon Ltd The White Hart Pub, Wimbledon
- Significantly high supply of public houses in the local area;
- Proposed provision of employment generating uses meaning a higher net number of jobs which will benefit the local economy; and
- Optimisation and best use of a grossly underutilised area of land in a PTAL 6b area.

7.2.10 The submitted information sets out that bringing the building back into use would not be financially viable. Officers conclude that the reuse of the existing building as a pub would not likely be feasible given these circumstances.

7.2.11 Officers note that the pub is not listed as an Asset of Community Value and has not traded for a number of years (approx. 9 years) and Officers consider that the application has sufficiently demonstrated that there is no realistic prospect of the building being used as a pub in the foreseeable future.

7.2.12 The loss of the public house is considered to be reasonably justified against the policy framework. Therefore, it is not necessary or justified to insist on the re-provision of a public house use in the proposed development.

Loss of employment land

7.2.13 In considering the principle of the proposed development it is necessary to acknowledge Policy DM E3 of the Council's SPP which seeks to protect scattered employment sites. The existing MOT Centre and workshops would be considered a scattered employment site as it is an employment generating use which is located

outside of a designated town centre and employment area. In this instance, the proposal would result in the complete loss of the existing employment use on the site. This is resisted by DM E3 (a) except where;

- i. The site is located in a predominantly residential area and it can be demonstrated that its operation has had a significant adverse effect on local residential amenity;
- ii. The size, configuration, access arrangements and other characteristics of the site makes it unsuitable and financially unviable for whole-site employment use; and,
- iii. It has been demonstrated to the council's satisfaction that there is no realistic prospect of employment or community use on this site in the future. This may be demonstrated by full and proper marketing of the site at reasonable prices for a period of 30 months (2½ years).

7.2.14 Policy DM E3 (b) states that the council will seek measures to mitigate against the loss of employment land which may include;

- i. Providing employment, as part of a mixed use scheme on-site; or,
- ii. Providing alternative sites for employment use (for instance, 'land swaps').

7.2.15 Officers consider that the proposed commercial use proposed on the site, which would provide employment, would be acceptable under the requirements of Policy DM E3. In addition, the halls of residence itself would provide some employment.

Proposals for new retail shop/commercial Class E floor space

7.2.16 In line with national policy, Merton's Core Planning Strategy policy CS7 Centres and Merton's Sites and Policies Plan policy DM R2 prioritise town centre type uses within or on the edge of town centres. Policy SD7 of the London Plan supports the sequential approach in order to direct retail uses to town centres in the first instance.

7.2.17 The scheme proposes a new unit on the ground floor, which could be used for retail purposes, or any other use within the new Class E – specifically, flexible commercial space (Use Class E – excluding E(e), E(f), E(g)(ii) and E(g)(iii)).

7.2.18 Merton's local policies set out that a sequential test approach is required for retail units over 280sqm where sites are not within a Town Centre. The proposed retail space is 275sqm and therefore falls below this threshold

7.2.19 Notwithstanding that the current proposal does not require a Retail Impact assessment (RIA), Officers note that the previous application, 21/P2565 was accompanied by a RIA which confirmed that the site is in an accessible location and it has been demonstrated that there is a "locationally specific" need for the proposed retail component of the scheme, which would not be met by locating it in or on the edge of nearby town centres, such as Wimbledon which is the nearest.

7.2.20 However, in any event, the end use may not be retail under the new wider Class E, which will allow the commercial space to more flexibly respond to local demand in the future.

7.2.21 The proposal is considered to be acceptable in regards to the provision of commercial Class E uses on site, which may include retail.

Contribution towards housing targets

7.2.22 Policy H1 of the London Plan 2021 states that development plan policies should seek

to identify new sources of land for residential development including intensification of housing provision through development at higher densities. Core Strategy policies CS8 & CS9 seek to encourage proposals for well-designed and conveniently located new housing that will create socially mixed and sustainable neighbourhoods through physical regeneration and effective use of space.

7.2.23 Policy H1 of the London Plan 2021 has set Merton a ten-year housing target of 9,180 new homes. The proposal would make a valuable contribution to meeting that target.

7.2.24 London Plan paragraph 4.1.9 states that “net non self-contained accommodation for students should count towards meeting housing targets on a basis of 2.5:1 ratio”. The proposal will provide 271 student beds, providing the equivalent of 108 self-contained residential units, making a significant contribution towards LB Merton’s housing target.

Small Sites

7.2.25 The application site has a site area of just over 0.25 hectares. The application site therefore does not fall under planning policy H2 (Small Sites) of the London Plan 2021. However, the site area, at approx. 0.26 hectares is close to this threshold and therefore the guidance in policy H2 is still relevant to an extent. Following on from the housing targets set out above, small sites are expected to deliver 2,610 new homes over the 10 year period (2019/20 - 2028/29). Policy H2 sets out that for London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.

Merton's five year land supply

7.2.26 Merton currently does not have a five-year supply of deliverable housing. It is therefore advised that members should consider this position as a significant material consideration in the determination of planning applications proposing additional homes.

7.2.27 Where local planning authorities cannot demonstrate a five year supply of deliverable housing sites, relevant decisions should apply the presumption in favour of sustainable development. This means that for planning applications involving the provision of housing, it should be granted permission unless:

- the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse effect of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole

7.2.28 In real terms, if Merton continues to not meet its housing supply, then greater weight will need to be given to delivering more housing in the planning balance. Therefore, it is important that the Council seeks to deliver new housing now and make the most efficient use of sites to deliver new homes with appropriately designed buildings. The scheme is considered to make efficient use of the site with a good quality development that respects the character and appearance of the area without being harmful. The additional accommodation created on the site will make a valuable contribution towards Merton meeting its housing targets.

Provision of student accommodation

- 7.2.29 London Plan Policy H15 (Purpose-built student accommodation) states that Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed. Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
- 7.2.30 The Mayor of London's Housing SPG, in Section 3.9, states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence. This is reiterated within paragraph 4.15.1 of the London Plan which states "London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation".
- 7.2.31 Merton's Policy DM H5 (Student housing, other housing with shared facilities and bedsits) states that the development of student housing is supported provided it:
- i. will not involve the loss of permanent housing;
 - ii. will not compromise capacity to meet the supply of land for additional self-contained homes;
 - iii. meets an identified local need;
 - iv. will not result in an overconcentration of similar uses detrimental to residential character and amenity;
 - v. complies with all relevant standards for that use;
 - vi. is fully integrated into the residential surroundings.
- 7.2.32 There is no current residential use on the site currently and as such there would be no loss of permanent housing.
- 7.2.33 The site is not allocated for residential development but in any event, the provision of student accommodation would contribute towards the London Plan housing targets.
- 7.2.34 There is not other dedicated student accommodation within the vicinity.
- 7.2.35 The proposal would comply with relevant guidance for student accommodation.
- 7.2.36 Officers conclude that the new use would be fully integrated into the residential surroundings.
- 7.2.37 Officers consider that the proposal would comply with the requirements of London Plan policy H15 and Local Plan policy DM H5.

Conclusion on principle of development

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

7.3 Affordable Housing

- 7.3.1 Policy H15 (Purpose Built Student Accommodation) of the London Plan seeks to ensure that local and strategic needs for purpose-built student accommodation is addressed provided that the use of accommodation is secured for students; at least 35% of the accommodation is secured as affordable student accommodation; and the

accommodation provides adequate living space and layout.

7.3.2 Policy H15 sets out, in relation to affordable student accommodation that:

- 3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider
- 4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance:
 - a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution.
 - b) where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E
 - c) the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.

7.3.3 The applicant has set out that “It is anticipated that the rents at Wimbledon will be in the order of about £50-£100 per week lower than average private sector room rate across London. It is proposed that a restriction be placed in the S106 agreement that all of the rooms have to be rented at a similar rate to other halls of residence within the UAL portfolio.”

7.3.4 The proposal will provide accommodation which is secured for students through a nominations agreement for occupation by students by University of the Arts London, a higher education provider, with all rents provided at an affordable level whilst providing adequate functional living space and layout, as required by London Plan H15. As such the proposal complies with all the relevant standards for that use, as required by Part (v) of Policy DM H5. The provision of at a minimum of 35% rooms as affordable student accommodation would avoid the need for a viability tested route. This provision would need to be secured by way of legal agreement.

7.3.5 Subject to legal agreement, the affordable element of the student accommodation would be acceptable in planning terms.

7.4 Design (character and appearance)

7.4.1 The NPPF, London Plan policies D3 and D4, Core Strategy policy CS 14 and SPP Policy DM D2 require well designed proposals which make a positive contribution to the public realm, are of the highest quality materials and design and which are appropriate in their context. Thus, development proposals must respect the appearance, materials, scale, bulk, proportions and character of their surroundings.

7.4.2 Policy DM D4 of Merton’s Sites and Policies Plan seeks to ensure that development which affects the setting of Conservation Areas either preserves or enhances their character and also seeks to protect heritage assets. Core Planning Policy CS14 supports these SPP Policies.

7.4.3 The site does not contain any designated heritage assets nor does it lie within a Conservation Area, however, to the west of the site lie two Conservation Areas: the

John Innes Merton Park Conservation Area to the west of the site on the other side of the tramline, and the John Innes Wilton Crescent Conservation Area to the north-west. There are a few designated and non-designated heritage assets around the site.

- 7.4.4 The site includes the former White Hart public house, originally of early 18th century date but substantially rebuilt following bomb damage during the Second World War, as well as other poor-quality garage units. Around the existing buildings are large areas of hard landscaping.
- 7.4.5 The removal of the existing buildings on site and the provision of a good quality replacement building, along with the improvements to the public realm to the frontage of the site is considered to have a positive impact on the character and appearance of the area and would generally enhance the setting of the Conservation Area, notwithstanding the overall height of the proposed building.

Massing and heights

- 7.4.6 Consideration of matters of massing and height may reasonably be informed by the application of both London Plan and local planning policies and supplemented by the Council's Tall Building Background paper which helped shape core strategy design policy and its justification.
- 7.4.7 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'.
- 7.4.8 Considering the London Plan definition, any building that has a significant impact on the existing scale and character of an area through height can be considered a tall building. In the context of Merton, where most of the borough is characterised by 2 storey suburban houses, any building of 4 storeys or higher could be considered a tall building in these locations.
- 7.4.9 Taller buildings can be an efficient use of land and if designed well at the ground level can contribute positively to the streetscene. Tall buildings can make a positive contribution to city life, be excellent works of architecture in their own right, can affect the image and identity of a city as a whole, and can serve as beacons for regeneration and stimulate further investment.
- 7.4.10 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'.
- 7.4.11 In policy terms, higher density development is directed towards centres and those areas that are well serviced in terms of public transport and infrastructure, and those areas that can accommodate the increase in density without having a detrimental impact on the character of the locality, including the historic environment
- 7.4.12 The LBM Tall Buildings paper indicates that "overall it is considered that suburban neighbourhoods in the borough are unsuitable locations for tall buildings, based on the distinct low scale and cohesive character of these areas, and their locations which are generally outside of centres in areas with low accessibility".
- 7.4.13 The proposed building at six storeys (although with the height more akin to a 5 storey residential building), would be higher than other buildings in the immediate vicinity of the site. However, for the reasons set out later in this letter, officers consider that the proposed development would not result in an adverse impact on this valued suburban character.

- 7.4.14 The Tall Buildings paper sets out that Tall buildings may be suitable in areas of the borough where all of the following factors are present:
- Regeneration or change is envisaged
 - Good public transport accessibility
 - Existing higher building precedent
- 7.4.15 In response to these criteria, officers conclude that:
- The site is within an area where change is envisaged, particularly given the higher housing targets of the London Plan and the fact that the existing site is under-used and does not contribute positively to the character of the area.
 - Public transport in the vicinity of the site is excellent.
 - Whilst the area is generally one of low to medium rise, there are buildings along Kingston Road of a similar scale to that currently proposed.
- 7.4.16 Therefore, Officers consider that the proposal would not conflict with the spirit and intention of the Tall Buildings Paper or Policy D9 of the London Plan.
- 7.4.17 The concept of the highest point on the building forming a focal point is supported and the treatment of the corner onto Kingston Road is considered to work well.
- 7.4.18 The scale of the proposal could be considered to fit within the local context, given its location, adjacent to a transport interchange and in the context of the surrounding built form which already includes buildings of a similar height opposite on Hartfield Road (albeit 4 storeys as opposed to six) and slightly further afield along Kingston Road. The building would be set back further from the frontage than the existing building and would deliver improvements to the public realm to the frontage of the site and to the neighbouring tram path.
- 7.4.19 In addition, Officers note that the scheme has received a unanimous green verdict from the DRP, where the Panel were comfortable with the scale, massing and height and how the building sat within the townscape.
- Layout
- 7.4.20 The layout, with a central courtyard and commercial frontage to Kingston Road is considered to be a sound urban design approach, ensuring an active frontage onto Kingston Road, a more private amenity area to the rear and the applicant has made efforts to ensure that the tram path elevation provides an active frontage.
- 7.4.21 It is noted that the requirements of TfL, in relation to the land adjacent to the tram line, are restrictive to the proposed development. TfL requires a 5m setback from the tram line. TfL have previously indicated that they support efforts to activate the frontage along the tram line but would have concerns regarding openings from the proposed building on the elevation facing the tram line. This significantly reduces the potential of the scheme to provide an active edge along this frontage.
- 7.4.22 The central courtyard is considered to be an innovative approach to providing good quality amenity space.
- 7.4.23 The layout of the retail areas would provide for workable units with reasonably controlled servicing arrangements in place.
- 7.4.24 The widening of Kingston Road pavement is a benefit of the proposal, particularly given the narrow pavement width currently. Conditions are proposed to ensure that the proposed works to the street do not to disrupt the free flow of pedestrians and avoid

creating a physical barrier to the shopfronts.

7.4.25 The widening of the tramline path is also a benefit of the proposal, and would create a route with natural surveillance, which is absent entirely presently.

7.4.26 In general, officers consider that the proposed layout is well thought out and based on sound urban design principles. It is considered that there are wider public realm benefits with the approach taken which would enhance the character and vitality of the area.

Design and Appearance

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

7.4.28 The proposal would have no harmful effects on any designated heritage assets or any protected views. Officers acknowledge that there would be an impact on views from streets in the surrounding area. However, Officers do not consider this change in outlook to be harmful. Officers note that the building would be taller than the nearby buildings. However, it is concluded that the architectural detailing and form has been well-informed by a robust character appraisal and has the potential to positively contribute towards the character and appearance of the area.

7.4.29 The vertical rhythm of the proposed building has been carefully considered and officers note that the design has responded to comments made by the Council's Urban Design Officer. The approach proposed, in relation to vertical rhythm and fenestration, is considered to be a suitable solution for the proposed building.

7.4.30 Good quality facing materials and window reveals can be secured by condition, to ensure good design detailing is carried through post planning to completion.

7.4.31 In terms of impact on adjacent Conservation Areas and listed buildings, the proposed building would sit outside (opposite side of tram tracks) of the John Innes Wilton Crescent/Merton Park CA and well away from Grade II listed buildings (Manor House and Dorset Hall) to the east and west respectively of the application site. The level of separation, landscaping, existing buildings and transport infrastructure offers some breathing space between the application site and these protected areas. As set out above, the proposed design is considered to be high quality and in many respects would enhance the street scene. The main contentious part of the proposal, which impacts on the adjacent conservation areas and viewed from nearby listed buildings is the proposed increased height, however given the design quality of the proposal and the proposed building height respecting the context of the site and its surrounding (not appearing too large), it is considered that the proposal would meet the policy requirement of at least preserving the setting of the Conservation Areas and listed buildings.

Design Review Panel comments

7.4.32 The scheme has gone before the DRP and received a unanimous green verdict. However, there were some minor concerns and queries set out by the DRP Panel.

- The Panel were uncomfortable about the gabled parapets and their 'fake' nature, especially as the PV panels behind would sit on a flat roof but at the same angle as the gables. The implication being that they should be removed

or be genuine roofs that the PV panels would sit upon. There was also some concern that the gables might not fully conceal the plant on the roof.

Response:

The design of the pitched parapets were formulated through detailed discussions with the Council's Urban Design Officer and Head of Policy. Officers consider they would add visual interest and variety and would assist with concealing rooftop plant. In addition, including pitched roofs behind would have reduced the area for PVs and would have prevented the use of a bio-solar roof

- There was a lot of discussion about the courtyard and landscape design. The maintenance strategy for these spaces was unclear and must be considered.

Response:

The applicant has set out that maintenance would be from ground level, as is carried out at other UAL facilities. Windows would be cleaned from roof level so as not to interfere with the courtyard level landscaping.

- However, it was suggested that only one line of trees might be necessary and the proposed species may benefit from reconsideration away from silver birch to an alder or robinia to get taller fastigate growth. It was also suggested that more seating would be beneficial. It was felt that the free-standing cycle parking should not initially be included and this would allow for more flexibility in the use of the space. Concerns were also raised over how the courtyard links with the route to the south. Overall, further work was needed on landscaping, particularly regarding the courtyard.

Response:

The landscape design was altered following the DRP meeting to include more seating and trees planted in a less regimental layout. In addition, some of the cycle parking has been moved to be inside the building to free up the courtyard space.

- The boundary between the tram path and elevation was considered a little fussy with a raised planter and this may make maintenance difficult.

Response:

The raised planter has been removed and replaced with ground level planting.

- They felt that the main corner entrance area had potential for more tree planting and seating to reinforce its focal point role. On the other corner it was felt that the servicing strategy for the retail unit needed more clarity as well as there needing to be a strategy for how students belongings etc. were to be dropped off/collected at the beginning and end of term/year as this was likely to generate vehicular traffic, there being no on-site parking at all.

Response:

An extra tree was added on Kingston Road in response to this comment, the amount of planting and seating that can be provided here is subject to maintaining adequate sight lines for tram drivers – this was a key point which was raised during our pre-application discussions with TfL Trams. The three trees proposed on the Kingston Road elevation have been strategically positioned to ensure adequate sight lines are retained.

In terms of servicing a retail service entrance with refuse storage was added on Rutlish Road close to the double yellow line area for ease of servicing from the Class E unit.

The issue of beginning/end of year student drop offs/collections is outlined with the accompanying Student Management Plan and based on UAL's experience of what has proved successful at their other halls of residence. It states:

"Our presence within residential neighbourhoods means that we take this aspect of our operation very seriously. A methodical approach (as outlined below), achieved through considerably increasing our level of staff presence ensures minimal disruption to neighbouring residents.

- The main move in period for new students at the beginning of every academic year will be spread over a weekend, and local residents advised of this date in advance.
- Upon reserving a room and completing their tenancy agreement, students will be advised of a date and time for arrival to take up occupancy of their new room. If students and parents choose to ignore these timings UAL reserve the right to refuse access until we are able to accept them.
- This 'appointment' type approach ensures the lowest possible level of disruption for the surrounding occupiers, as student/parents are not all converging on the locality at one time.

Supporting information is sent in advance of each residents move in date detailing public transport routes and nearby parking locations in a specific document we refer to as 'Guide to Living in Halls'.

- Internally the layouts were felt to be generally well thought out however it was felt that there could be better separation between the communal and private areas regarding the positioning of the bathrooms.

Response:

Following the DRP the shared bathrooms were relocated so that the number of students who had to walk past the communal kitchen door to get to the WC would be minimised.

- Whilst the stair cores seemed to have good amounts of natural light, the corridors were long and not well lit. The applicant was encouraged to explore means of getting natural light into these corridors.

Response:

Following the DRP, windows have been added to the ends of these corridors where possible (obscurely glazed to the south elevation).

Layout of DRP scheme:

7.4.33

Latest landscaping scheme on right to address Urban Design Officer's comments.



7.5 Urban Greening Factor and trees

- 7.5.1 Policy G5 of the London Plan sets out that Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential.
- 7.5.2 Policy G6 of the London Plan sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain, including sites not within areas of special protection.
- 7.5.3 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity.
- 7.5.4 The existing site has a negligible UGF, due to the extensive hard surfacing across the site. The proposal includes soft landscaping and planting within the central courtyard area, a green buffer to the boundary with the tram path, green roofs and the planting of street trees.
- 7.5.5 There are existing trees on site but these are of limited value both visually and from an ecological perspective. The new trees to the courtyard and on the Kingston Road frontage will be high quality replacements, secured by the landscaping condition.
- 7.5.6 In terms of urban greening the submitted Landscaping Strategy demonstrates that an Urban Greening Factor (UGF) score of 0.43 has been achieved, above the target score for residential schemes of 0.4. The development would comply with policy and will be a very significant improvement over the existing situation on site.

7.6 Impact on neighbouring amenity

- 7.6.1 Planning Policy D6 (Housing quality and standards) of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 7.6.2 Planning policy CS policy 14 of Merton's Core Planning Strategy and policy DM D2 of Merton's Sites and Policies Plan seek to ensure new developments does not unacceptably impact on the amenities of the occupiers of any adjoining and nearby surrounding properties. Planning policy DM D2 (Design considerations in all developments) states that amongst other planning considerations that proposals will be expected to ensure provision of appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens.
- 7.6.3 Policy DM EP2 (Reducing and mitigating noise) states that development which would have a significant effect on existing or future occupiers or local amenity due to noise or vibration will not be permitted unless the potential noise problems can be overcome by suitable mitigation measures.

Daylight and Sunlight

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

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

- 7.6.5 The application is accompanied by a Sunlight and Daylight Analysis. The report states that:

“All of the existing neighbouring residential properties in close proximity of the site have been modelled and tested in order to assess the potential impact on the Daylight & Sunlight amenity they presently enjoy.

As the existing site is largely undeveloped and comprises large open areas of car parking and hardstanding, the outlook from the various neighbouring properties is almost completely unobstructed and those neighbouring buildings therefore receive exceptionally high levels of natural daylight and sunlight under "existing" conditions. This means that they can experience a relatively large percentage reduction of Daylight and Sunlight without any detrimental or harmful effect on "amenity". In view of this fundamental factor, in determining the acceptability of the impact of the proposed development, the key measure of adequacy is not the percentage reduction factor taken from the current high starting points, but to ensure that the absolute residual VSC values remain adequate, as this is a true and more accurate measure of the actual amount of daylight that will continue to be received by existing neighbouring buildings.

Taking the guidance from the GLA and Planning Inspectorate, the typical

acceptable absolute residual VSC value in an urban environment should remain around mid-teens. All of the windows serving habitable rooms in the various neighbouring residential buildings will continue to receive well above this absolute target, demonstrating that all of those rooms will continue to receive an adequate, and in most cases, good, level of natural daylight once the development is built.

All rooms/windows that fall within the BRE Sunlight Criteria have been tested for Annual and Winter Sunlight APSH, and the results show that all rooms will continue to receive very good levels of Annual and Winter Sunlight well in excess of the BRE recommendations.

In overall conclusion, the occupiers of all of the neighbouring residential properties will continue to enjoy adequate levels of Daylight and Sunlight amenity commensurate with the area in general and it should therefore follow that the Council's policy objectives have been satisfied.”

7.6.6 The assessment confirms that the properties opposite the Kingston Road façade should be the main consideration. The results show that they will still receive values in excess of the mid-teens (the majority are in excess of 20%) and as such will retain reasonable levels of natural daylight.

7.6.7 There are other exceptions such as 1A Rutlish Road which will experience a minor shortfall against the guidance in Annual Probable Sunlight Hours (APSH), however, this is due to the existing projecting wall of 14-20 Charles Road which projects and blocks sunlight until mid/late afternoon.

7.6.8 All other residential windows tested will continue to receive well above the BRE guidance levels, and in the majority of cases be above 20% VSC which is considered a good level of natural daylight. All rooms tested within the BRE criteria for APSH have demonstrated that they will continue to receive very good levels. It is considered therefore the proposal suitably protects the daylight and sunlight of surrounding properties.

7.6.9 The Daylight and Sunlight analysis focuses on the following neighbouring properties:

- 148 Kingston Road
- 173 to 193 Kingston Road (odd numbers)
- 140 Kingston Road
- 1A, 1B and 1C Rutlish Road and 14-20 Charles Road
- 140a, 140b and 140c Sinclair Court
- 32 Rutlish Road

148 Kingston Road

7.6.10 There is a fair separation distance to the development as the outlook from those windows is across the full width of the tramway and notwithstanding the band of mature trees, there is a virtually totally unobstructed view of the sky. This gives rise to very high "existing" VSC values. As such, the windows can experience a relatively large percentage loss of direct daylight but still remain adequately daylight. The absolute residual VSC values for the nine windows in the flank wall range from 24.46% VSC and 25.02% VSC at ground floor level, 25.56% VSC to 27.21% VSC at first floor level and 22.79% VSC to 29.29% VSC at second floor level. This demonstrates that very good levels of natural daylight will remain. These VSC results were calculated with the effect of the current mature trees omitted in accordance with the advice in the BRE Guidelines, but in practice, those trees largely obscure view of the Site in any event.

173 to 193 Kingston Road (odd numbers)

- 7.6.11 All of the absolute residual VSC values at the western end of the terrace will however continue to remain well in excess of mid-teens and the properties at the eastern end of the terrace will continue to receive absolute VSC values in excess of 20% VSC thereby demonstrating that these properties will continue to receive very good levels of natural daylight.
- 7.6.12 As these properties face within 90° of due south, they fall within the BRE Sunlight Criteria and although there will be an inevitable reduction in Annual and Winter Sunlight, all of the windows will continue to comfortably satisfy the BRE Annual and Winter Sunlight Standards.

140 Kingston Road

- 7.6.13 140 Kingston Road has a blank gable end flank wall facing onto the site. The windows in the rear elevation do however have an oblique view of the site and although the general outlook from those windows will remain unaffected, they have nonetheless been tested. The results show that there will be full compliance with the BRE VSC standards with no window experiencing a material reduction in daylight.

1A, 1B and 1C Rutlish Road and 14-20 Charles Road

- 7.6.14 All windows bar one will continue to receive a residual VSC value in excess of 20% VSC. The one window which is below 20% is the ground floor window, labelled W1 in 1B Rutlish Road, where the absolute residual VSC value will be 17.73%. This is however still well above mid-teens (which the applicant argues is generally held to be acceptable having regard to planning appeal decisions).
- 7.6.15 In terms of sunlight, the one window which did not fully comply is the ground floor window in 1A Rutlish Road labelled W2 where the residual Annual Sunlight percentage will be 19% APSH against a target of 25%, and the Winter Sunlight APSH reading was 2% APSH against the target of 5% APSH. That minor shortfall is however due to the projecting wall of 14-20 Charles Road as that building projects further forward of the building line of 1A Rutlish Road and effectively blocks all sunlight until mid to late afternoon.

140a, 140b and 140c Sinclair Court

- 7.6.16 The results show that there will be full and comfortable compliance with the BRE VSC daylight standards and the Annual and Winter Sunlight APSH standards. These properties will therefore continue to receive a good level of natural daylight and sunlight and there will be no material impact on "amenity".

32 Rutlish Road

- 7.6.17 The results show full compliance with the BRE VSC standards with all of the windows in the principal front and rear elevations continuing to receive very good levels of natural daylight well above the BRE recommendations. Equally, in terms of sunlight, all windows tested would meet BRE guidance.
- 7.6.18 There would be a reduction to the north facing side windows but these are not habitable areas.

Conclusion on light impact

- 7.6.19 The existing site is relatively open and properties enjoy exceptionally high light levels. Therefore, any development of the site would have an impact on neighbouring properties. The proposed development would have some impact on neighbouring properties, with levels of light loss beyond a 20% reduction but, importantly, the

retained light levels are typical of an urban setting and the impact is considered to be acceptable in planning terms

Privacy/overlooking/visual intrusion

7.6.20 As a matter of judgement officers consider the separation distances between the front facing windows of the properties opposite the site on Kingston Road and Rutlish Road to be such that it would not harm the privacy of occupiers of these properties. Whilst there would be an increase in building height and windows facing each other, the application site is separated from neighbouring properties by a public highway, offers a reasonable level of separation and would be a standard relationship within an urban setting.

7.6.21 The proposal would project forward of the building line of the flats to the south at no.32 Rutlish Road. Whilst the proposed building would also project beyond the rear elevation of this neighbour, the proposed building has been spilt into two sections and would be inset away from the boundary to offer a degree of breathing space. 32 Rutlish Road itself also benefits from being set away from the boundary with the application site and has an expansive sized rear garden area (so the proposed building would not appear too imposing/overbearing). There would be the potential for some additional overlooking of the rear gardens of the properties to the south of the site. The applicant has included obscured glazing to windows on the southern elevation and projecting fin screens to the windows facing into the courtyard, to avoid any overlooking to this neighbouring property.

7.6.22 It is noted that there would be a degree of intervisibility between the proposed windows of the student accommodation. Whilst there is a degree of tension here, with some windows positioned relatively close to each other, it is considered that a degree of intervisibility is unavoidable. The separation distances of windows on either side of the courtyard varies from 19.5m to 13.5m (13.5m towards the southern part of the site). The arrangements would be acceptable in planning terms.

7.6.23 Officers acknowledge that there would be some marginal adverse impact on some neighbouring properties by reason of the increased bulk and massing across the site. However, it is noted that the existing built form on site is very low profile and therefore any redevelopment of the site would result in an increase in built form over what exists currently and the proposal is considered to have struck a reasonable balance in terms of optimisation of the site whilst minimising and mitigating for the impact on neighbouring amenity.

Noise/disturbance

7.6.24 The existing lawful use of the site as a pub and motor repair garage has the potential to generate noise. The proposed use would not involve significant noise from machinery or plant and given it is largely a residential use, the impact is not considered to be significant.

7.6.25 The main access to the proposed accommodation would be located on Kingston Road which would include a 24 hour manned entrance, with a fob requiring access to the building. The terms of students' leases would help enforce noise limitations in terms of student behaviour if required. Access onto Rutlish Road or the tram path would be limited to emergency exits only.

7.6.26 The application is accompanied by a Noise Impact Assessment, which concludes that acceptable internal noise levels can be achieved through acoustically enhanced double glazing.

Conclusion on impact on neighbouring amenity

- 7.6.27 The proposal would result in some noticeable reduction in light levels to neighbouring properties, however, the impacts are limited and Officers consider them to be within justifiable ranges.
- 7.6.28 Overlooking is limited to front windows only, which would be normal in suburban locations.
- 7.6.29 Overall, the impact of the proposed development, in terms of the impact on neighbouring amenity, is, on balance, considered to be acceptable.

7.7 Standard of accommodation

- 7.7.1 Policy H15 of the London Plan sets out that purpose-built student accommodation should provide adequate functional living space and layout. SPP Policy H5 sets out that the student accommodation should comply with all relevant standards for that use.
- 7.7.2 In total, 5.2% of the total student bedrooms will be wheelchair accessible (a total of 14), meeting the accessible space standards set out in Building Regulation required M4(3) 'wheelchair user dwellings'. All accessible rooms will include an accessible shower room and kitchenette and will be accessible via stairs and a lift
- 7.7.3 Each student bedroom will have sizeable windows providing natural light with an opening section, behind a perforated panel, to provide natural ventilation to the rooms. Whilst there will be the ability to open the window, the fixed perforated panel will prevent any items falling or being thrown onto the adjoining tramline, which could potentially disrupt the service, as requested by TfL.
- 7.7.4 A Noise Assessment has been prepared by RBA Acoustics in support of the application to assess the levels of noise likely to be incident on the building facades and establish a suitable noise criteria to achieve for different parts of the development. Given the potential for noise from the adjoining Kingston Road and tramline balanced with the potential for overheating, comfort cooling will be provided within each of the student bedrooms to ensure ambient noise levels for occupants during night-time hours.
- 7.7.5 In terms of internal light levels to the proposed development, the Daylight and Sunlight Analysis confirms that when tested against the new BRE methodology introduced in 2022, only 3% (10 rooms) are shown to fall short of the recommended targets, with 96% of the rooms proposed fully meeting the target standards under the new more stringent test. The rooms which do not meet the target are recessed into the courtyard facades; despite this they only fall slightly short of the target 50% threshold, with 7 exceeding 40% and only 3 falling slightly below. Officers acknowledge that it is uncommon for a high-density scheme to achieve full 100% compliance and the pass rate of over 96% is considered a very good performance. It is confirmed therefore the majority of the bedrooms proposed will achieve good levels of internal daylight, with only a very small number falling marginally below the target levels but still receiving good levels of daylight.
- 7.7.6 The standard of accommodation is considered to be acceptable.

7.8 Inclusive Design and Accessible Housing

- 7.8.7 Policy D5 (Inclusive Design) of the London Plan 2021 states that development proposal should achieve the highest standards of accessible and inclusive design. Inclusive design creates spaces and places that can facilitate social integration, enabling people to lead more interconnected lives. Development proposals should help to create inclusive neighbourhoods that cumulatively form a network in which people can live and work in a safe, healthy, supportive and inclusive environment.

- 7.8.8 Planning Policy D7 (Accessible housing) of the London Plan 2021 seeks to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that at least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings. However, this requirement does not extend to purpose built student accommodation and therefore the provision falls to be determined by the Building regulations.
- 7.8.9 The proposed layout provides 14 wheelchair accessible studio rooms (5.2% of the total), meeting the accessible space standards set out in Building Regulation required M4(3) 'wheelchair user dwellings'. All accessible rooms will include an accessible shower room and kitchenette and will be accessible via stairs and a lift.
- 7.8.10 The proposal would be acceptable in terms of inclusive design and accessible housing.

7.9 Transport, parking and cycle storage

- 7.9.1 Planning Policy T6 of the London Plan states that Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. At a local level Policy CS20 requires developers to demonstrate that their development will not adversely affect on-street parking or traffic management. Policy T5 seeks to ensure that adequate cycle parking is provided. Policies DMT1-T3 seek to ensure that developments do not result in congestion, have a minimal impact on existing transport infrastructure and provide suitable levels of parking.

Car Parking

- 7.9.2 The proposal does not provide for any car parking on site, being a short (less than 10 minute) walk from the Wimbledon College of Arts campus, Wimbledon Town Centre, South Wimbledon Station and adjacent to the Merton Park tram stop. No disabled car parking spaces are provided on site as it is considered very unlikely students will require a car parking space, given the type of use and the public accessibility of the site which has the highest PTAL rating (6b).
- 7.9.3 As part of their tenancies, students will be strictly prohibited from taking cars to the site or main WCA campus, those that do not adhere to this risk forfeiting their room. As such, the proposal will not result in an increase in onstreet car parking and indeed will have a significant net benefit in terms of its impact on the local transport network when compared with the existing uses on site.
- 7.9.4 The site is within a Controlled Parking Zone and therefore, in order to minimise the impact on the local highway network and to minimise impact on parking pressure, officers advise that the application should be subject to a s.106 agreement to preclude the issuing of parking permits to future occupiers.

Cycle Parking

- 7.9.5 London Plan Policy T5 (Cycling) states that proposals should be designed and laid out in accordance with the London Cycling Design Standards. Purpose Built Student Accommodation should provide 0.75 long-stay spaces per bedroom, with 1 short-stay space per 40 bedrooms
- 7.9.6 The proposal provides 204 long stay spaces which will be split between external covered stands within the secure courtyard and an internal store room. The majority of spaces use two tier racks although there are 10 accessible Sheffield Stands. 7 Visitor spaces to the student use are provided via Sheffield Stands in the courtyard. For the

retail use, there are 12 no. visitor spaces located between the trees on Kingston Road and 2 long stay spaces located internally. The student cycle parking will be located predominantly within the courtyard and will be both covered and secure. The cycle parking would exceed the London plan standards and this will ensure the development encourages the use of sustainable transport modes.

Deliveries and servicing

- 7.9.7 Policy CS20 of Merton's Core Planning Strategy states that the Council will require developments to incorporate safe access to and from the public highway as well as on-site parking and manoeuvring for emergency vehicles, refuse storage and collection, and for service and delivery vehicles.
- 7.9.8 Following discussions with the Council's Highways team, all servicing will be carried out from Rutlish Road. The proposal will therefore include the relocation of four shared use parking bays on Rutlish Road and amendments to the curb to remove existing vehicle crossovers to provide an extended double yellow line (25.6m) on the western side of the carriageway.
- 7.9.9 The application is accompanied by Swept Path analysis drawings which demonstrate that servicing vehicles can adequately access the site. The Council's Transport Planner has reviewed the proposed arrangements and raises no objection. A condition limiting the length of servicing vehicles has been recommended in order to ensure that vehicles are able to manoeuvre and turn in Rutlish Road.

Trip Generation

- 7.9.10 The Transport Assessment sets out that the proposed development will generate 23 less vehicle trips (in comparison to the existing lawful use of the site) and 8 less person trips in the morning peak hour and 12 less vehicle trips and 44 less person trips in the evening peak hour. It is concluded that the proposed development will generate less peak hour and daily vehicle and person trips on the surrounding highway network when compared with the existing land uses
- 7.9.11 The trip generation exercise has demonstrated that traffic generation resulting from the proposed scheme will be less compared with the existing lawful uses (it is noted that the site is not currently in operation). However, the last lawful use of the site is the baseline for this assessment. It is concluded that the proposed development will have a positive effect on the local highway network, compared to the existing lawful use of the site.

Construction process

- 7.9.12 The submission includes a Construction Logistics Plan (CLP), which shows swept path analysis drawings for construction vehicles. The CLP confirms that construction related deliveries would avoid the high peak periods.
- 7.9.13 The maximum length vehicle that would be required to access the site is 16.4m (articulated lorry). A number of mitigation measures, such as providing Banksman are proposed. However, both the Highway Authority and the Council's Transport Planners have raised concern in regards to vehicles reversing into Rutlish Road. Therefore, an alternative solution may need to be formulated through the submission of a Construction Logistics Plan.
- 7.9.14 A number of conditions are recommended to minimise impacts of the construction process, such as the submission of a Demolition/Construction Logistics Plan, to ensure that impacts are minimised as far as reasonably practicable.

Adjacent tram path

- 7.9.15 The proposal includes the upgrading and widening of the adjacent tram path. TfL trams have been consulted but no comments have yet been received. However, fairly extensive comments were provided under the previous application 21/P2565. To summarise, no objection was raised. The following matters were raised:
- Need to replace fence between tram line and tram path as the existing is not sufficiently high.
 - Need to physically stop vehicles entering the tram path accidentally.
 - Concern that proposed trees and cycle parking may block tram driver sight lines.
 - Concern that there would be glare or glint from windows which may affect tram drivers.
 - Dedication of land along tram path to one single ownership.
 - Condition restricting opening windows over tram path
 - Fire rating of the building
 - Condition to ensure no adverse communications systems impact on the tram way.

TfL comments

- 7.9.16 TfL has commented on the application and incorporates the response from TfL Trams.
- 7.9.17 TfL supports the improvements to the footway width on Kingston Road in line with London Plan policies T2 (Healthy Streets) and D8 (Public realm). A glare and glint study is recommended. Other transport matters are concluded to be acceptable by TfL.
- 7.9.18 The development includes the resurfacing and widening of the tram path adjacent to the site. The benefits of this, in terms of activating the elevation facing the tram path are dealt with elsewhere in this report. However, this enhanced path will provide improved access to the tram stop, which would be a significant public benefit of the scheme.
- 7.9.19 The tram path would be restricted by way of retractable bollards proposed to ensure that vehicular access is limited to maintenance and emergency vehicles only. This is considered a reasonable and proportionate measure to prevent road users attempting to access the tram path and would not unduly hamper the movement of pedestrians.
- 7.9.20 TfL has stipulated certain restrictions, such as no balconies to the elevation fronting the tram path and restricted opening to windows to this elevation. TfL has also recommended more substantial fencing along the boundary with the tram line (although it is noted that the tram path is currently divided from the tram line with the low level fencing that TfL has raised concern with, so this would be a benefit of the application given that the fencing exists currently).
- 7.9.21 In terms of tram driver sight lines, an issue raised by TfL, it is noted that the crossing is a controlled crossing and therefore there is no conflict with traffic. However, notwithstanding this and noting that there are no standard guidelines for sight lines from trams, the setting back of the proposed building, in comparison to the existing would create wider sight lines than currently exist.
- 7.9.22 Whilst it is unlikely that the proposed development would raise safety issues in terms of glare and glint from windows, given that the junction is a controlled crossing, a

condition is recommended in line with TfL's comments.

- 7.9.23 The applicant is considered to have reasonably addressed all the issues set out by TfL in relation to the trampath arrangements and a legal agreement is recommended to deal with associated issues of land transfer, highway adoption and maintenance.

Conclusion on transport matters

- 7.9.24 The proposed use would not generate a significant number of traffic movements, other than during drop off and pick up arrangements at the beginning and ending of term/semesters. This would be controlled by way of a pre-booking system to minimise congestion. Students would not be permitted access to a car and public transport at the site is excellent, with good levels of cycle parking provided also.

- 7.9.25 The issue of servicing and deliveries has been carefully considered and formulated through discussions with the transport planning team. Construction related traffic is considered to be acceptable and deliveries would be restricted to vehicles no longer than 8m in length. Overall, the proposal would encourage alternative modes of transport and would be acceptable in transport planning terms.

7.10 Sustainable design and construction

- 7.10.1 London Plan policies SI 2 to SI 5 and CS policy CS15 seek to ensure the highest standards of sustainability are achieved for developments which includes minimising carbon dioxide emissions, maximising recycling, sourcing materials with a low carbon footprint, ensuring urban greening and minimising the usage of resources such as water.
- 7.10.2 The application is accompanied by an Energy Statement, a Sustainability Statement, an Overheating Assessment and details of the heat pumps to be used. The Energy Statement concludes that the proposed development at Kingston Road will achieve a 35% improvement over Part L1A 2021 of the Building Regulations. This meets the requirement of Policy SI 2 of the London Plan 2021.
- 7.10.3 The Climate Change Officer has concluded that a carbon offset contribution of £71,429 is required and will be secured by legal agreement.
- 7.10.4 Subject to suitably worded conditions and legal agreement to secure the carbon offset contribution, the proposal is considered to be acceptable in terms of climate change and sustainability.

7.11 Air Quality and potentially contaminated land considerations

- 7.11.1 The whole of Merton is within an Air Quality Management Area. The site is within one of the Greater London Authority's (GLAs) air quality focus areas.
- 7.11.2 The air quality assessment sets out that a number of receptor locations have been identified to assess the likely range of exposure to nitrogen dioxide, along with PM10 and PM2.5 particulates. The assessment confirms that with appropriate mitigation the effects of construction dust will be 'not significant' and that the "building and transport related emissions associated with the proposed development are both below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral"
- 7.11.3 During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'
- 7.11.4 The proposal is car free and would therefore generate fewer vehicle movements than the existing lawful use of the site. Heating would be by way of air source heat pumps as opposed to gas boilers.

- 7.11.5 The Air Quality Assessment demonstrates that the development would be air quality neutral.
- 7.11.6 The Council's Air Quality Officer has considered the arrangements and raises no objection subject to condition.
- 7.11.7 In terms of potentially contaminated land, the site has a commercial history and therefore the requirement for land contamination assessments is recommended to be secured by way of condition.

7.12 Flood risk and drainage

- 7.12.1 Policy SI 13 of the London Plan (Sustainable drainage) sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features.
- 7.12.2 The site is within Flood Zone 1 (low probability of flooding) and is not within a critical drainage area.
- 7.12.3 The scheme includes details of a Sustainable Urban Drainage System and demonstrates a sustainable approach to the management of surface water on site, with green roofs, below ground storage tanks and permeable paving designed to the required standards. It is proposed that the surface water runoff will discharge via gravity at a restricted rate of 1.3l/s to the existing public surface water sewer adjacent to the site in Kingston Road through a new connection to the Thames Water sewer system. This matter can be satisfactorily addressed by way of condition and officers raise no objection in this regard.
- 7.12.4 The Council's Flood Risk and Drainage Officer raises no objection subject to conditions relating to surface water drainage and on-going maintenance. Subject to these conditions, Officers raise no concern in relation to drainage or flooding issues.

7.13 Biodiversity

- 7.13.1 The London Plan sets out at Policy G6 that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. The package of planting, soft landscaping, green roofs and mitigation measures such as bat boxes is such that the proposal would represent an overall net biodiversity gain.

7.14 Secure by Design considerations

- 7.14.2 Policy DMD2 of Merton's Sites and Policies Plan sets out that all developments must provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles.
- 7.14.3 Overall, the proposal provides a significant benefit in terms of safety and security. The existing tram path is not welcoming, it is narrow, the alignment is such that there are concealment spots and the poor quality boundary enclosure to the site, damaged by graffiti, with minimal lighting all result in a poor built form environment in terms of the perception of safety. The proposed development would ensure that the trampath is well lit, removes concealment opportunities and provides natural surveillance to the tram path.
- 7.14.4 The concerns of the Secure by Design Officer in relation to hit and miss brickwork is noted, however, the corbelled cornice feature would deter climbing.
- 7.14.5 The courtyard area would be private to students and therefore there is no need for planting to be a minimal height to maximise natural surveillance.

- 7.14.6 CCTV can be included and secured by condition.
- 7.14.7 Officers recommend a Student Management Plan be submitted and agreed through the s.106 process, which will ensure that reasonable management measures are put in place and maintained thereafter.
- 7.14.8 Officers recommend that a secured by design final certificate is controlled by way of condition.

7.15 Fire Safety

- 7.15.1 Planning Policy D12 (Fire safety) of the of the London Plan 2021 highlights that fire safety of developments should be considered from the outset. How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the earliest possible stage to ensure the most successful outcomes are achieved, creating developments that are safe and that Londoners can have confidence living in and using.
- 7.15.2 Planning Policy D12 (Fire safety) of the London Plan 2021 states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
 - 1) identify suitably positioned unobstructed outside space: for fire appliances to be positioned on appropriate for use as an evacuation assembly point.
 - 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
 - 3) are constructed in an appropriate way to minimise the risk of fire spread
 - 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
 - 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.
 - 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.
- 7.15.3 All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:
 - 1) the building's construction: methods, products and materials used, including manufacturers' details
 - 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
 - 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
 - 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these

5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building

6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

7.15.4 The application is accompanied by a detailed Fire Strategy by Liam Doherty Bsc (Hons), AIFireE, ACABE (a Director at B-First Fire Safety), which sets out that the building has been designed and constructed in accordance with relevant fire safety standards and regulations and includes features such a Category 4 residential sprinkler system, Category L2 fire detection and alarm system in all student accommodation, adequate refuge provisions, and reasonable means of escape, including three escape stairs. In the event of a fire, a simultaneous evacuation policy will be in place to ensure that all occupants are safely evacuated in a timely manner. This building shall achieve 60 minutes fire resistant structural frame.

7.15.5 The Strategy goes on to set out that the proposed building is not defined as a "Relevant Building" in accordance with Regulation 7(2) as it is less than 18m in height to the top floor from ground floor level. However, as the building is greater than 11m in height all construction methods and materials proposed for the construction of the external walls shall be constructed to achieve Class A2-s1, d0 or better from Ground level.

7.15.6 Matters of fire safety would also be controlled by the Building Regulations. However, the submission demonstrates that matters of fire safety have been taken into account in the design and provides a satisfactory level of assurance that measures of fire safety will be addressed.

8. ENVIRONMENTAL IMPACT ASSESSMENT

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

9. LOCAL FINANCE CONSIDERATIONS

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

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

10. CONCLUSION

10.1.1 The existing site is underused and provides an opportunity for redevelopment. The balance of commercial and residential uses is considered to be acceptable in principle.

10.1.2 The proposal would provide student accommodation which is positive in terms of educational benefits and also contributes towards the Council's housing targets, along with an improved pedestrian environment along Kingston Road and the tram path.

10.1.3 The proposal would provide a policy compliant level of affordable accommodation on site, which is a benefit to the scheme.

10.1.4 The building would be large in its context but Officers consider that a landmark building

would be suitable to this corner site, which marks a transport node.

- 10.1.5 There would be some marginal impact on neighbouring amenity but not amounting to material harm.
- 10.1.6 Issues relating to transport impacts have been resolved through discussions with Officers and other development control issues are considered to be acceptable as outlined above in the report.
- 10.1.7 Officers consider that the proposal is acceptable in planning terms, subject to conditions and a legal agreement and therefore the recommendation is for approval.

11. RECOMMENDATION

11.1 **GRANT** planning permission subject to conditions and s106 agreement securing the following:

- Provision of 35% affordable student housing accommodation
- Tram path – provision of new fence, widening and re-paving, lighting, land transfer, highway adoption and maintenance.
- Provision of on-street landscaping, cycle parking and street trees. Provision of new public realm including paving and landscaping on Kingston Road and Rutlish Road site frontages, including ongoing maintenance costs.
- Relocation of parking bays on Rutlish Road and associated changes to road markings.
- Details and provision of employment initiatives during construction to be provided on-site by Hollybrook
- Student Management Plan.
- £2,000 to meet the costs of monitoring the travel plan over five years
- Car free and permit free agreements – future occupants, with exception of those eligible for a blue badge, will be restricted from applying for resident's car parking permits.
- Carbon offset contribution of £71,429.00.
- The applicant covering the Council's reasonable costs of all work in drafting S106 and monitoring the obligations.

And the following conditions:

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

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

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:
- 01 LOCATION PLAN
 - 02 EXISTING SITE PLAN
 - 03 EXISTING KINGSTON ROAD ELEVATION
 - 04 EXISTING RUTLISH ROAD ELEVATION
 - 05 EXISTING TRAM LINE ELEVATION
 - 06 PROPOSED SITE PLAN
 - 07 PROPOSED KINGSTON AND RUTLISH RD SITE ELEVATIONS
 - 08 PROPOSED TRAMLINE SITE ELEVATION AND SITE SECTION
 - 09 PROPOSED KINGSTON RD ELEVATION
 - 10 PROPOSED RUTLISH RD ELEVATION
 - 11-A PROPOSED TRAMLINE ELEVATION
 - 12 PROPOSED SOUTH ELEVATION
 - 13 PROPOSED LONG SECTION EAST
 - 14 PROPOSED LONG SECTION WEST
 - 15 PROPOSED CROSS SECTION
 - 16 PROPOSED BAY ELEVATION 1 - KINGSTON RD
 - 17-A PROPOSED GROUND FLOOR PLAN
 - 18 PROPOSED FIRST FLOOR PLAN
 - 19 PROPOSED SECOND FLOOR PLAN
 - 20 PROPOSED THIRD FLOOR PLAN
 - 21 PROPOSED FOURTH FLOOR PLAN
 - 22 PROPOSED FIFTH FLOOR PLAN
 - 23 PROPOSED ROOF FLOOR PLAN
 - 24 PROPOSED ROOM PLANS 1
 - 25 PROPOSED ROOM PLANS 2
 - 26 PROPOSED ROOM PLANS 3

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

- 3 Prior to commencement of above ground works, full details and samples of all materials to be used in the construction of the external surfaces of the development hereby permitted shall be submitted to and approved in writing by the local planning authority. Details must include a detailed schedule of materials, physical examples of materials from the manufacturer where appropriate, a photographic sample board, sample panels where appropriate and notwithstanding the submitted drawings, rendered drawings, elevations and sections at a scale of 1:20, showing details of window reveals, glazing type, framing, glazing bars, cills, soffits and brickwork detailing. The development shall be carried out only in accordance with the agreed details.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policies D4 and D8 of the London Plan 2021, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Policies Plan 2014.

- 4 Prior to the commencement of above ground works, details of the surfacing of all those parts of the site not covered by buildings or soft landscaping, including any parking, service areas or roads, footpaths, hard and soft shall be submitted in writing for approval by the Local Planning Authority. No works that are the subject of this condition shall be carried out until the details are approved, and the development shall not be occupied / the use of the development hereby approved shall not commence until the details have been

approved and works to which this condition relates have been carried out in accordance with the approved details.

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

- 5 The development shall not be occupied until the existing redundant crossover/s have been removed by raising the kerb and reinstating the footway in accordance with the requirements of the Highway Authority.

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

- 6 Development shall not commence until a working method statement has been submitted to and approved in writing by the Local Planning Authority to accommodate:
- (i) Parking of vehicles of site workers and visitors;
 - (ii) Loading and unloading of plant and materials;
 - (iii) Storage of construction plant and materials;
 - (iv) Wheel cleaning facilities
 - (v) Control of dust, smell and other effluvia;
 - (vi) Control of surface water run-off.

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

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

- 7 Prior to the commencement of the development hereby permitted, a Demolition and Construction Logistics Plan (including a construction management plan in accordance with TfL guidance) shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented prior to the first occupation of the development hereby permitted and shall be so maintained for the duration of the use, unless the prior written approval of the Local Planning Authority is first obtained to any variation.

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

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

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

- 9 Prior to the commencement of above ground works, a glare and glint study, and provision of any mitigating measures that may be reasonably needed to ensure visibility of the tram signal head, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

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

- 10 Landscaping: full details of a landscaping and planting scheme shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved in the first available planting season following the completion of the development or prior to the occupation of any part of the development, whichever is the sooner. Details shall include on a plan, full details of the size, species, quantities and location of the proposed plants. Any trees which die within a period of 5 years from the completion of the development, or removed or become seriously damaged or diseased or are dying, shall be replaced in the next planting season with others of the same approved specification, unless the local planning authority gives prior written consent to any variation.

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

- 11 Green wall: full details of 12m² of green wall to the cycle storage area, including the location, design, method of construction and a planting scheme shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved prior to the completion and occupation of the development.

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

- 12 Schwegler insect house: full details of the location of a minimum 10no. Schwegler insect houses shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved following the completion of the development or prior to the occupation of any part of the development, whichever is the sooner.

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

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

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

- 14 Swift bricks: full details of the type and location of the 20 no. Swift bricks around the building as recommended in the in the 'preliminary ecological assessment' shall be submitted to and approved in writing by the local planning authority and shall be installed as approved prior to the completion of the development, and shall be permanently retained in-situ and be maintained to a satisfactory condition thereafter.

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

- 15 Urban Greening Factor - The development hereby permitted shall not be occupied until the Urban Greening factors set out in the Landscape and Public Realm Strategy (dated January 2023) have been fully implemented and shall be permanently maintained as such thereafter to the satisfaction of the Local Planning Authority.

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

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

Reason: To manage and prevent further deterioration of existing low quality air across London in accordance with London Plan policies GG3 and SI1, and NPPF 181.

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

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

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

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

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

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

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

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

- 21** 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 Impact Assessment Report Reference 12179.RP01.EBF.1, dated 19 January 2023 shall be implemented as a minimum standard for the development. A post construction compliance noise survey shall be conducted and any remedial measures implemented should the submitted criteria fail to be achieved.

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

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

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

- 23** The construction environmental management plan, produced by Hollybrook dated 9th January 2023 shall be adhered to for the duration for the development.

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

- 24** BREEAM - New build non-residential (Pre-Commencement) - No development shall commence until a copy of a letter from a person that is licensed with the Building Research Establishment (BRE) or other equivalent assessors as a BREEAM - Pre-Commencement (New build non-residential) assessor that the development is registered with BRE under BREEAM (either a 'standard' BREEAM or a 'bespoke' BREEAM) and a Design Stage Assessment Report showing that the development will achieve a BREEAM rating of not less than the standards equivalent to 'Very Good' has been submitted to and approved in writing by the Local Planning Authority. The submission shall also include

evidence to show how the development will meet the London Plan C02 reduction targets (equivalent to minimum emissions reductions required to achieve BREEAM excellent).

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

- 25** The mitigation and enhancements recommended in part 7 of the submitted Preliminary Ecological Appraisal shall be carried out prior to the first occupation of the development hereby approved and maintained thereafter.

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

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

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

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

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

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

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

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits

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

Reason: In order to provide the opportunity to record the history of the site and to comply with the following Development Plan policies for Merton: policy HC1 of the London Plan 2021, policy CS14 of Merton's Core Planning Strategy 2011 and policy DM D4 of Merton's Sites and Policies Plan 2014.

- 29** Obscured Glazing - Before the development hereby permitted is first occupied, the windows in the south elevation of 'Cluster 1B' and 'Cluster 3B' shall be glazed with obscured glass and shall be maintained as such thereafter.

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

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

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

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

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

- 32** Screening - The screening to the courtyard facing windows to 'Cluster 1B' and 'Cluster 3B' as shown on the approved plans shall be implemented before the development is first occupied and retained permanently thereafter.

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

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

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policies D4 and D14 of the London Plan 2021, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Policies Plan 2014.

- 34** Fire Strategy - The development shall be carried out in accordance with the provisions of the Fire Safety Planning Statement prepared by B-First Fire Safety (dated 25th January 2023) and must fully comply with The Building Regulation 2010 (as amended) unless otherwise approved in writing by the Local Planning Authority.

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

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

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

- 36** Surface Water Drainage - The development hereby permitted shall not commence until details of the final design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the London Plan, Merton's SuDS policies and SPD and the national Non-Statutory Technical Standards for SuDS, and the NPPF. The required drainage details shall include:

- e) The final solution should follow the principles set out in the approved drainage strategy by Walsh Engineers (ref: 5648-WAL-RP-C-0300-04) . Where infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 1.3l/s which is equivalent to the pre-development Greenfield run-off and provide storage/attenuation of no less than 165m³.
- f) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Where infiltration is proposed, confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
- g) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
- h) Details of drainage management responsibilities and maintenance regimes for the drainage system.

- 37** Drainage - Details shall be provided of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the appropriate standards for Surface Water Drainage SuDS and to ensure that the final drainage design does not increase flood risk on or off site in accordance with NPPF 167&169, London Plan (2021) policy SI 12, SI 13, Merton CS (2011) policy CS16 and Merton SPP (2014) policies DMF1 and DMF2.

- 38** Drainage maintenance - Prior to the occupation of the final phase of development, a Site-wide Sustainable Drainage Management and Maintenance Plan for the lifetime of the development (including a management and maintenance plan for on-site watercourses, SuDS and culverts) shall be submitted to and approved in writing by the Local Planning Authority.

The sustainable drainage management and maintenance plan shall include as a minimum:

- c) Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company;
- d) Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime. The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development with NPPF (2021) paras 167&169, London Plan (2021) policy SI 12, SI 13, Merton CS (2011) policy CS16 and Merton SPP (2014) policies DMF1 and DMF2.

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

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

- 40** Deliveries to the site in the operational phase of the development shall only be carried out by vehicles with a maximum length of 8.0m.

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

- 41** Wheelchair Accessible Homes - Not less than 5% of the purpose built student accommodation units hereby permitted shall be constructed shall be wheelchair accessible throughout or easily adaptable for residents who are wheelchair users and shall be retained as such unless otherwise agreed in writing with the Local Planning Authority.

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

- 42** Sustainability (Water Consumption) - The development shall be carried out in accordance with the measures set out in the submitted Energy Statement and Sustainability Statement. In addition, no part of the development hereby approved shall be occupied

until evidence has been submitted to, and approved in writing by, the Local Planning Authority confirming that the development has achieved internal water consumption rates of no greater than 105 litres per person per day

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

INFORMATIVE

- 1 This planning permission contains certain conditions precedent that state 'before development commences' or 'prior to commencement of any development' (or similar). As a result these must be discharged prior to ANY development activity taking place on site. Commencement of development without having complied with these conditions will make any development unauthorised and possibly subject to enforcement action such as a Stop Notice.
- 2

INFORMATIVE

The applicant is advised to check the requirements of the Party Wall Act 1996 relating to work on an existing wall shared with another property, building on the boundary with a neighbouring property, or excavating near a neighbouring building. Further information is available at the following link:
<http://www.planningportal.gov.uk/buildingregulations/buildingpolicyandlegislation/currentlegislation/partywallact>
- 3

INFORMATIVE

Details of the BREEAM assessment and a list of approved assessors can be found at www.breeam.org
- 4

INFORMATIVE

The survey and report in respect of land contamination must be formulated having regard to the Contaminated Land Exposure Assessment model (CLEA 2002), CLR10 and associated guidance developed by DEFRA and the Environment Agency. Where appropriate the survey shall include a conceptual site model and a full risk assessment of contaminants on the site.
- 5

INFORMATIVE

It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off-site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of ground water. 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).
- 6

INFORMATIVE

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

- 7** **INFORMATIVE**
This permission creates one or more new units which will require a correct postal address. Please contact the Street Naming & Numbering Officer at the London Borough of Merton
- Street Naming and Numbering (Business Improvement Division)
Corporate Services
7th Floor, Merton Civic Centre
London Road
Morden
SM4 5DX
Email: street.naming@merton.gov.uk
- 8** **INFORMATIVE**
It is Council policy for the Council's contractor to construct new vehicular accesses. The applicant should contact the Council's Highways Team on 020 8545 3829 prior to any work starting to arrange for this work to be done. If the applicant wishes to undertake this work the Council will require a deposit and the applicant will need to cover all the Council's costs (including supervision of the works). If the works are of a significant nature, a Section 278 Agreement (Highways Act 1980) will be required and the works must be carried out to the Council's specification.
- 9** **INFORMATIVE**
You are advised to contact the Council's Highways team on 020 8545 3700 before undertaking any works within the Public Highway to obtain the necessary approvals and/or licences. Please be advised that there is a further charge for this work. If your application falls within a Controlled Parking Zone this has further costs involved and can delay the application by 6 to 12 months.
- 10** **INFORMATIVE**
Any works/events carried out either by, or at the behest of, the developer, whether they are located on, or affecting a prospectively maintainable highway, as defined under Section 87 of the New Roads and Street Works Act 1991, or on or affecting the public highway, shall be co-ordinated under the requirements of the New Roads and Street Works Act 1991 and the Traffic management Act 2004 and licensed accordingly in order to secure the expeditious movement of traffic by minimising disruption to users of the highway network in Merton. Any such works or events commissioned by the developer and particularly those involving the connection of any utility to the site, shall be co-ordinated by them in liaison with the London Borough of Merton, Network Coordinator, (telephone 020 8545 3976). This must take place at least one month in advance of the works and particularly to ensure that statutory undertaker connections/supplies to the site are co-ordinated to take place wherever possible at the same time.
- 11** **INFORMATIVE**
Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015
- 12** **INFORMATIVE**
In accordance with paragraph 38 of the NPPF, The London Borough of Merton (LBM) takes a positive and proactive approach to development proposals focused on solutions. LBM works with applicants/agents in a positive and proactive manner by:
- i) Offering a pre-application advice and duty desk service.
 - ii) Where possible, suggesting solutions to secure a successful outcome.

iii) As appropriate, updating applicants/agents of any issues that may arise in the processing of their application.

In this instance:

i) The applicant/agent was provided with pre-application advice.

ii) The applicant was offered the opportunity to submit amended plans in order to make the proposal acceptable in planning terms.

iii) The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

13 **INFORMATIVE**

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

14 **INFORMATIVE**

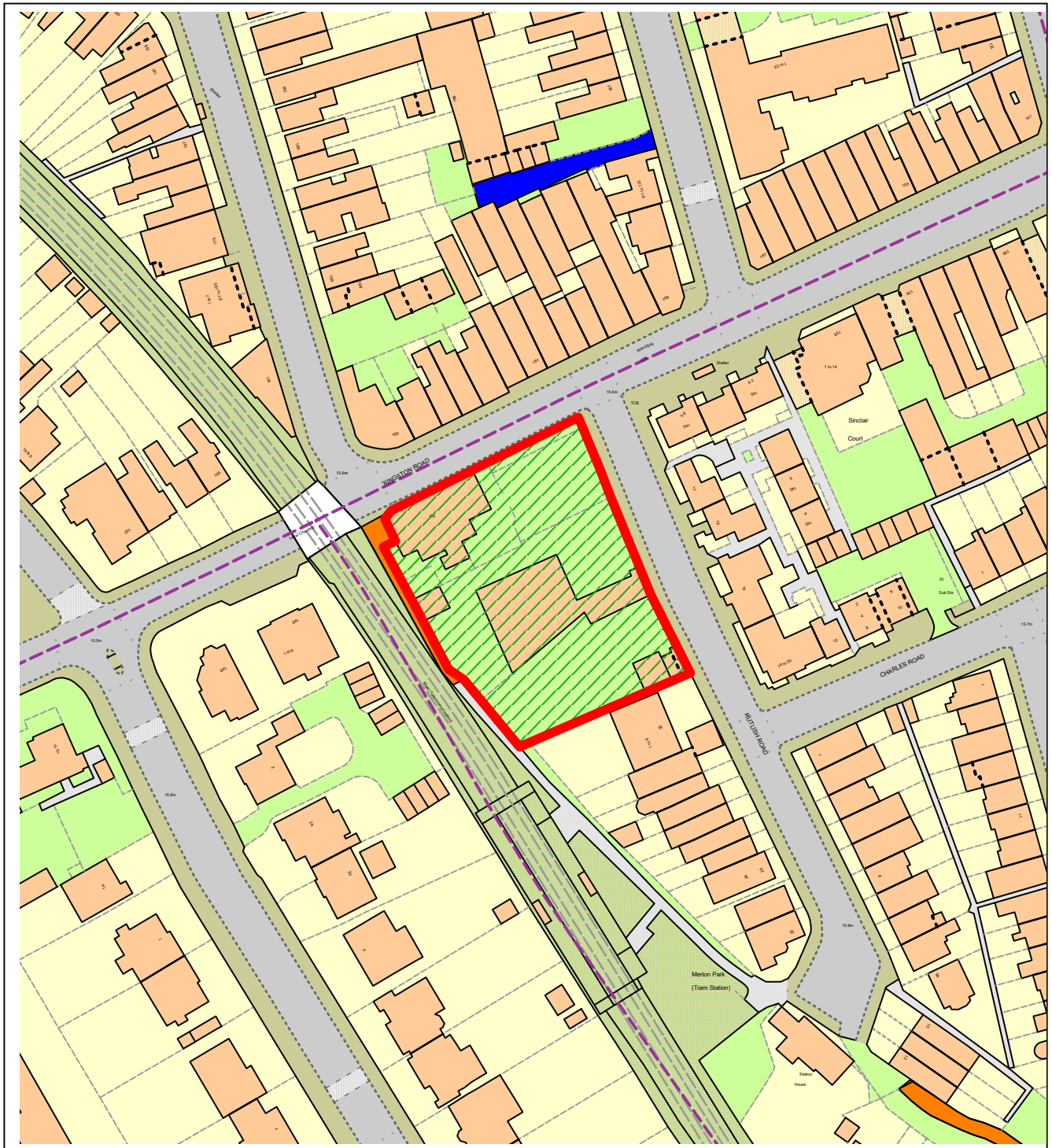
Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

15 **INFORMATIVE**

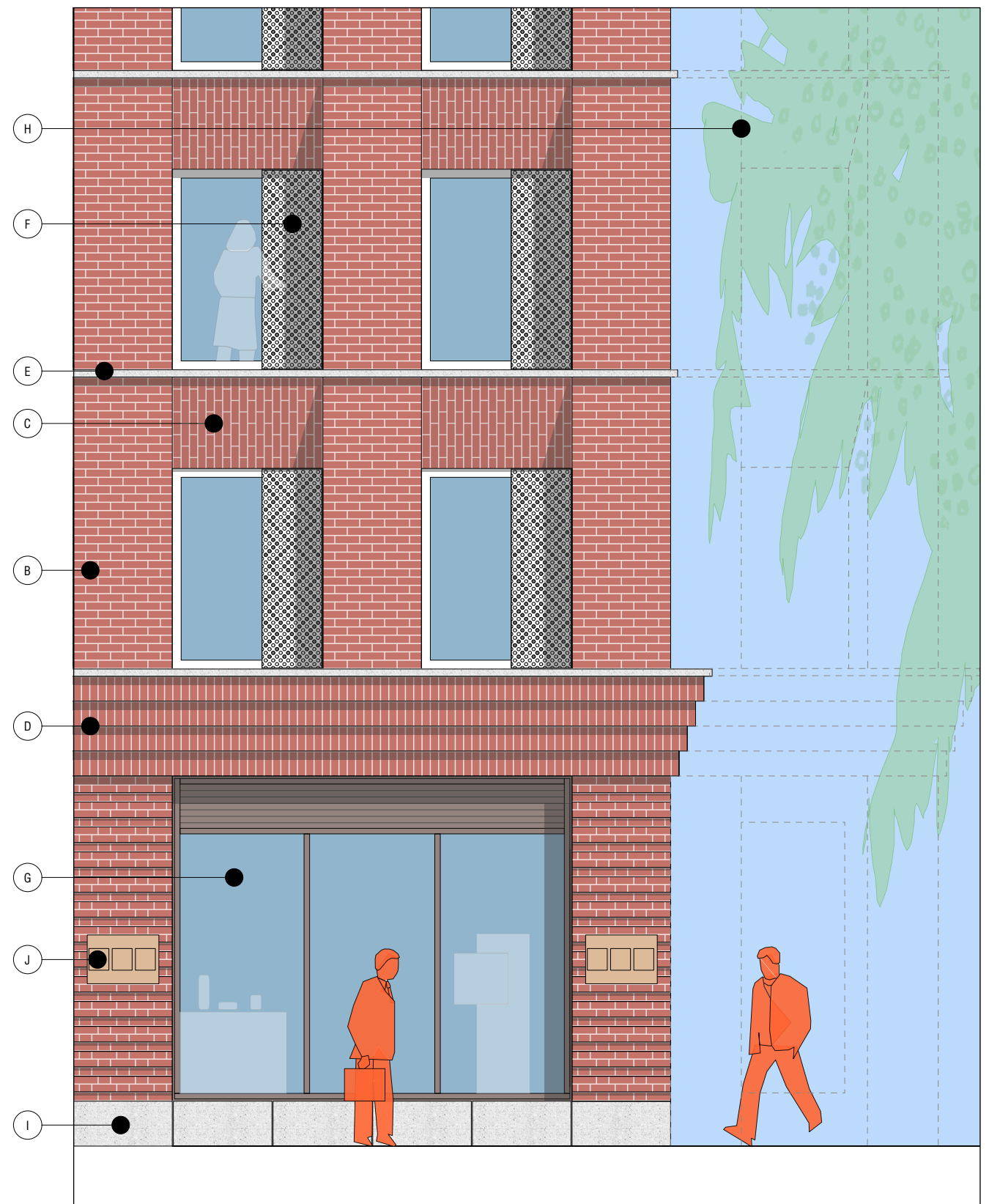
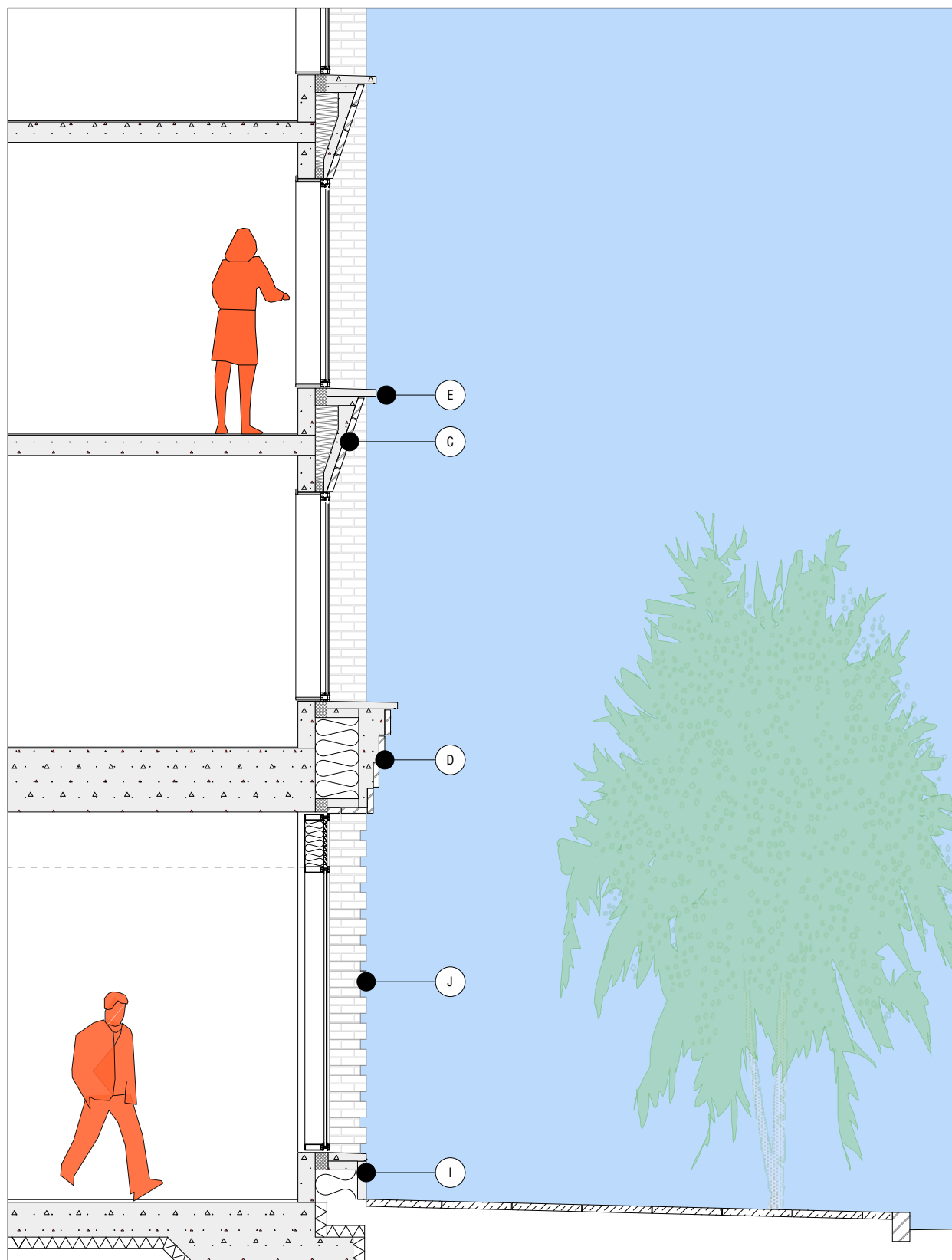
No surface water runoff should discharge onto the public highway including the public footway or highway. When it is proposed to connect to a public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where the developer proposes to discharge to a public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

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

NORTHGATE SE GIS Print Template



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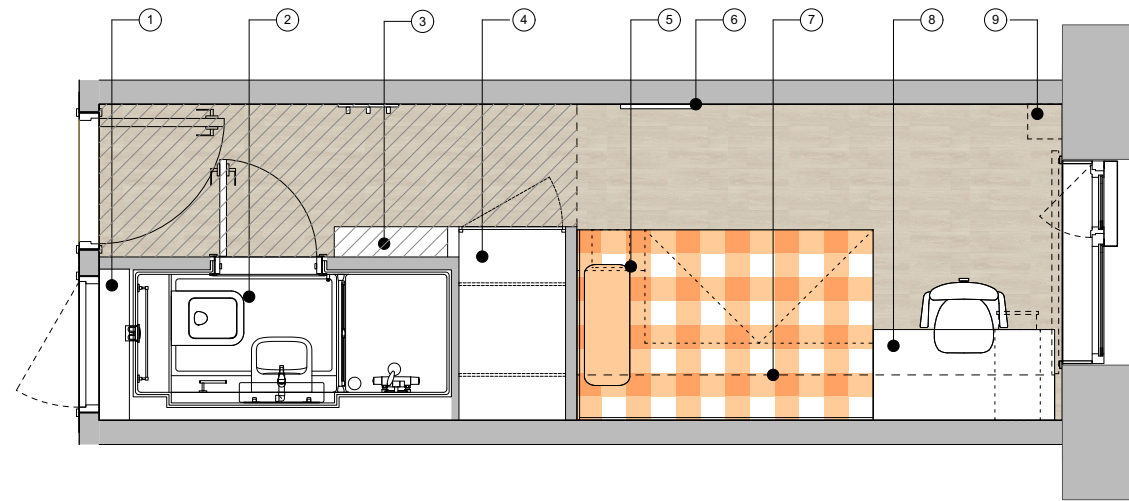


KEY

- (A) Light red toned brickwork formed in stretcher bond with white mortar
- (B) Dark red toned brickwork formed in stretcher bond with white mortar
- (C) Angled vertically coursed brickwork above window head
- (D) Vertical brick formed as projecting corbelled cornice to ground floor

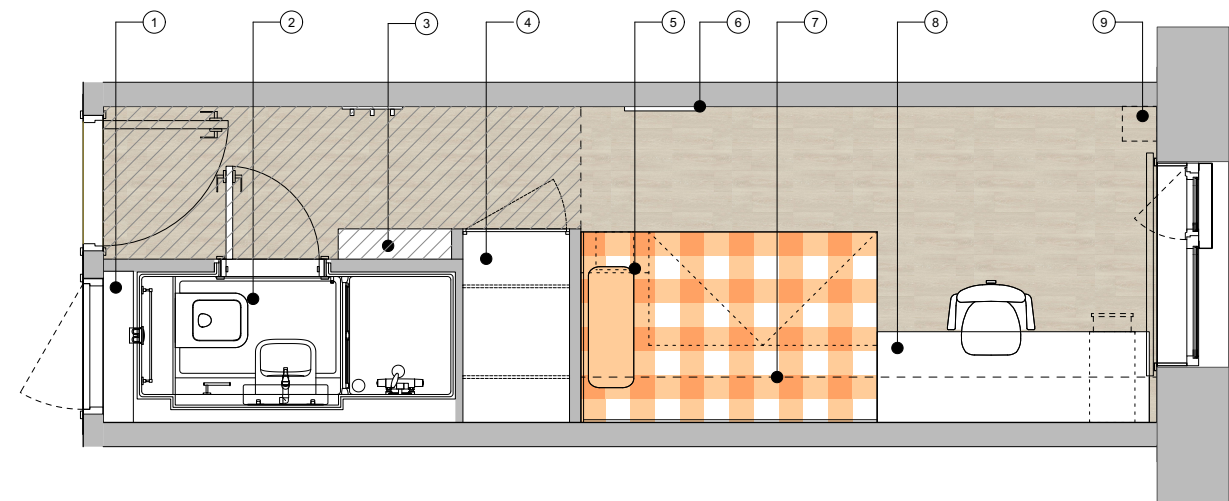
- (E) Reconstituted stone string course below windows
- (F) Perforated metal over opening ventilation panels to student rooms
- (G) Ground floor glazed shopfronts louvres at top (and signage to retail units)
- (H) Chamfered corner at main street junctions (shown by dashed lines here)

- (I) Base of building formed in reconstituted stone
- (J) Textured brick and tile detail to ground floor streetside columns



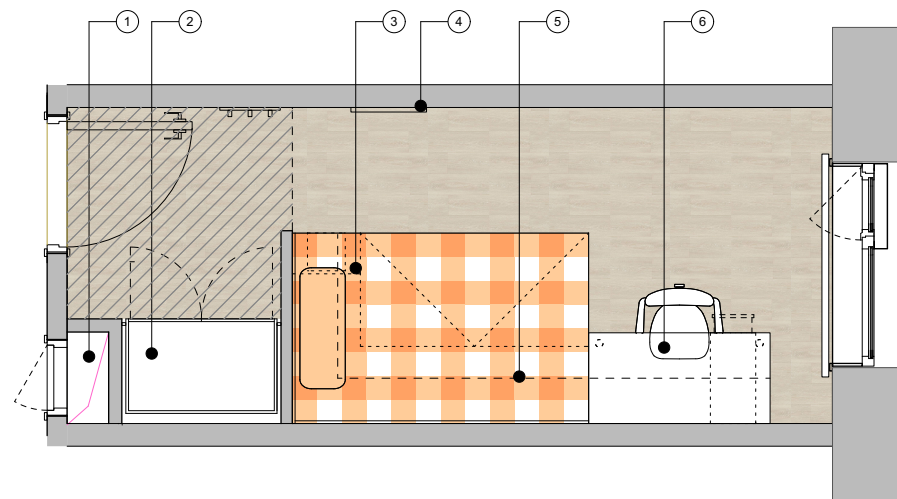
- ① SERVICE RISER
- ② SHOWER ROOM
- ③ FULL HEIGHT SHELVING
- ④ WARDROBE
- ⑤ 1260 x 1960mm BED WITH LIFT UP STORAGE UNDERNEATH
- ⑥ MIRROR
- ⑦ HIGH LEVEL STORAGE / SHELVING
- ⑧ DESK AND CHAIR
- ⑨ RAINWATER PIPE IN BOXING TO SOME ROOMS

ROOM TYPE A1 - ENSUITE



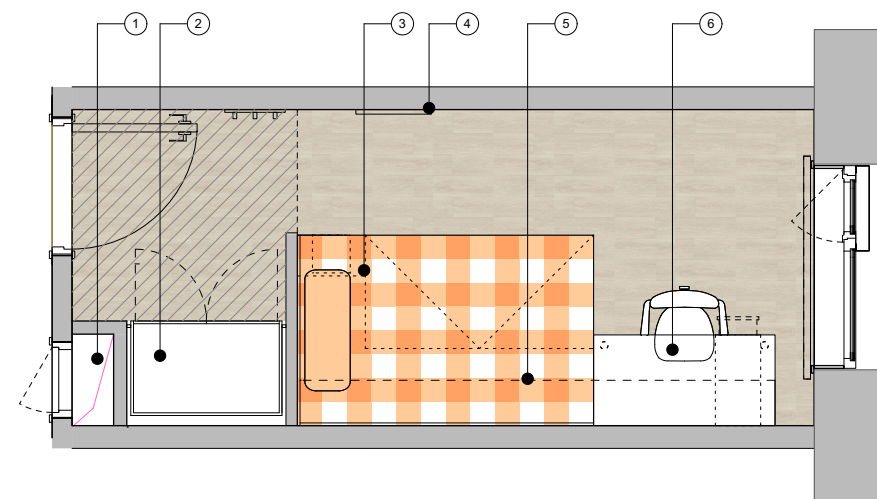
- ① SERVICE RISER
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- ⑥ MIRROR
- ⑦ HIGH LEVEL STORAGE / SHELVING
- ⑧ DESK AND CHAIR
- ⑨ RAINWATER PIPE IN BOXING TO SOME ROOMS

ROOM TYPE A1a - ENSUITE



- ① SERVICE RISER
- ② WARDROBE
- ③ 1260 x 1960mm BED WITH LIFT UP STORAGE UNDERNEATH
- ④ MIRROR
- ⑤ HIGH LEVEL STORAGE / SHELVING
- ⑥ DESK AND CHAIR

ROOM TYPE B1 - NON ENSUITE

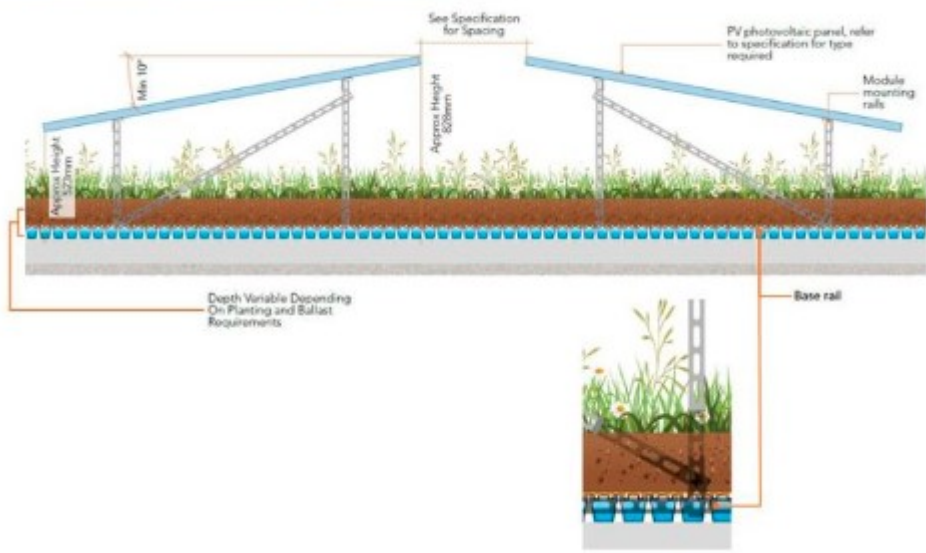


- ① SERVICE RISER
- ② WARDROBE
- ③ 1260 x 1960mm BED WITH LIFT UP STORAGE UNDERNEATH
- ④ MIRROR
- ⑤ HIGH LEVEL STORAGE / SHELVING
- ⑥ DESK AND CHAIR

ROOM TYPE B1a - NON ENSUITE

INDICATES CEILING BULKHEAD

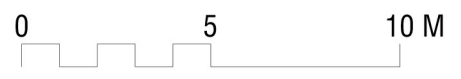
Bauder biosolar module section - cross section





REV A	BRICK TONES UPDATED, GROUND FLR GRILLES TO WINDOWS	23.03.10
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Stephen Marshall
 (Urbanism) Ltd
 Gainsborough Studios
 1 Poole Street, London N1 5EB
 T: 020 7033 3130 F: 020 7739 0607



PROPOSED WEST (TRAM LINE) ELEVATION

PROJECT: Kingston Road
 TITLE: Elevation
 DATE: March 2023
 SCALE: 1:200 @ A3

P11
 REV A

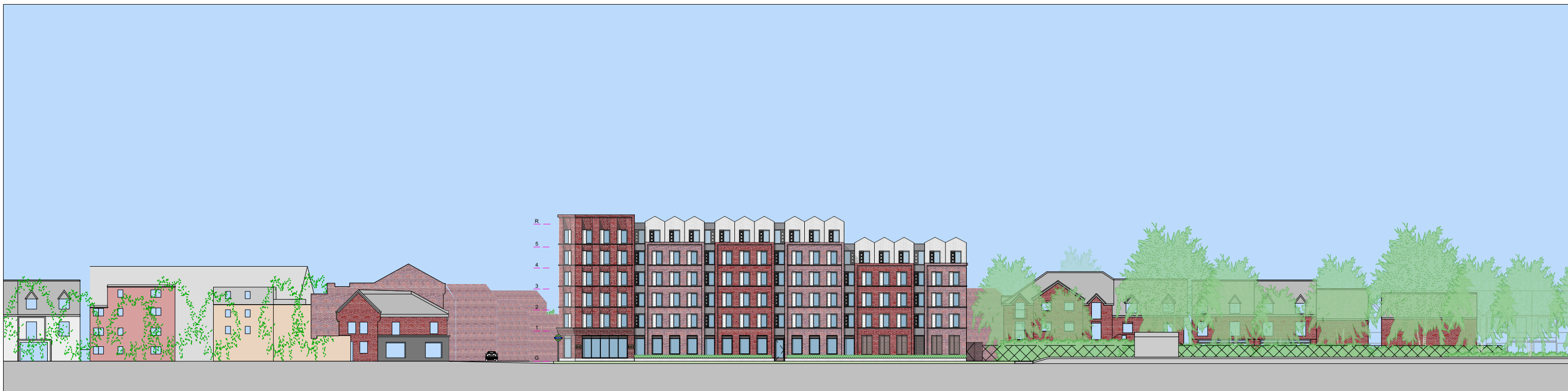


1 Kingston Road Site Elevation
Scale: 1:500

Page 224



3 Rutlish Road Site Elevation
Scale: 1:500



1 Tram Line Site Elevation
Scale: 1:500

Page 225

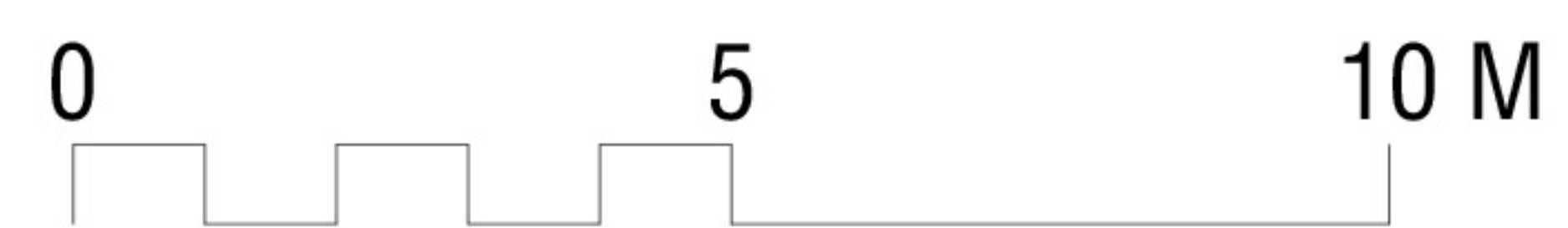


2 Courtyard site section
Scale: 1:500

Page 2/8



R
5
4
3
2
1



PROPOSED KINGSTON ROAD ELEVATION