

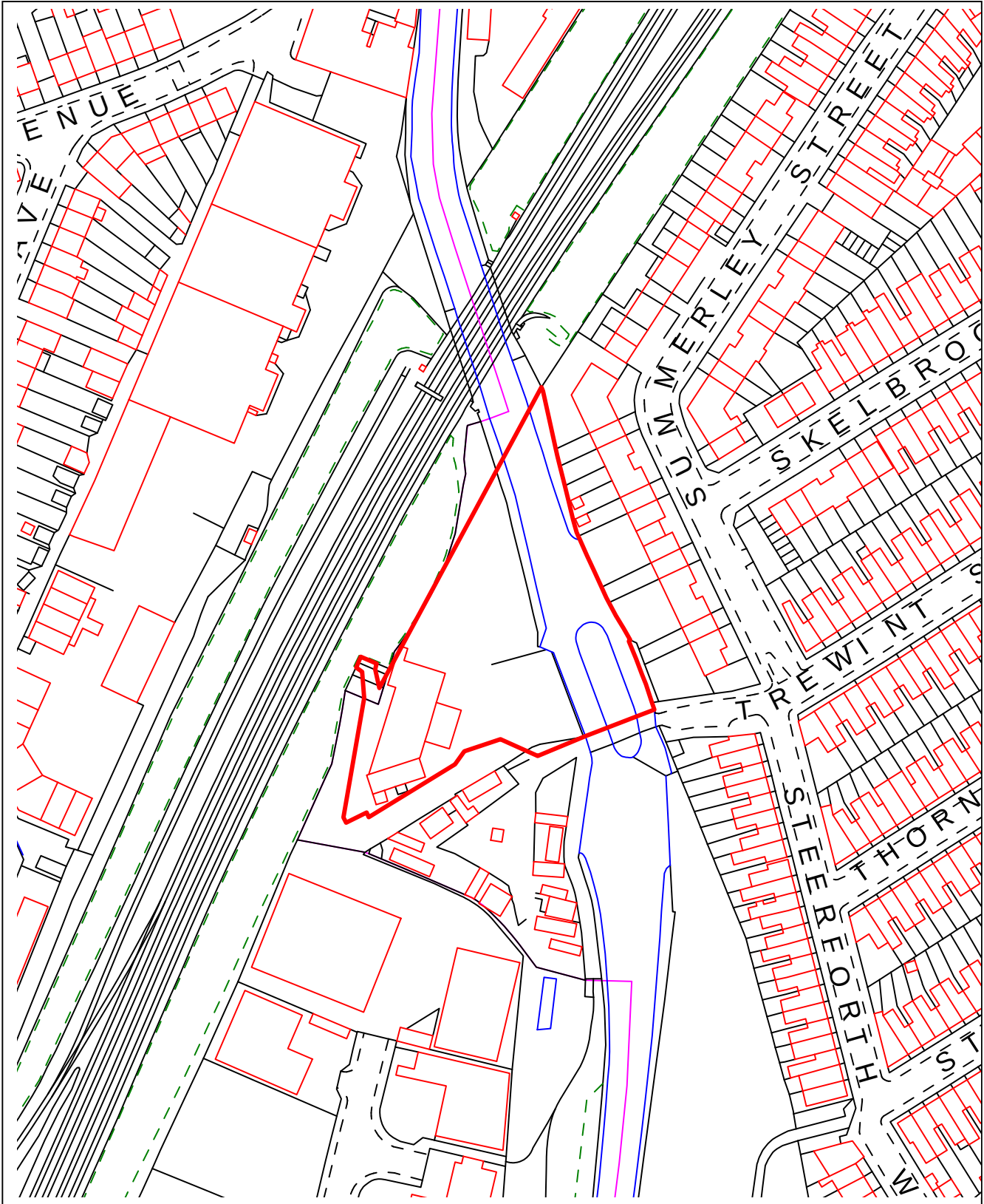
Committee Date:	25/07/2019		
Item No.	6		
Site Address:	Garratt Mills Trewint Street SW18 4HA		
Application Number:	2019/1083	Date Validated:	14/03/2019
Ward:	Earlsfield	Officer:	Daniel Piercy
Application Type:	Application for Full Permission		
Proposal:	Demolition of existing buildings and the erection of two blocks between 8 and 6 storeys (including double height ground floor with mezzanine) linked by a single-storey building with mezzanine level, comprising of 292 co-living rooms with internal and external amenity space (Sui Generis), cafe and restaurant use (Class A3), new pedestrian bridge, riverwalk, landscaping, plant, refuse and bicycle stores and associated works.		
Recommendation Summary:	Approve Subject to Conditions and S106 agreement CIL Liable		

SITE DETAILS:

0.535 ha triangular-shaped-site which includes the River Wandle, a 0.3 ha piece of land to the west of the river and an island which is sited within the centre of the river. The existing site accommodates two storage companies and one scrap-metal company (Class B8). A single-storey building is located towards the western boundary of the site. Several shipping containers stacked up-to four-levels high are located through-out the site, including along the river boundary to the east and southern boundary. The site is otherwise enclosed by high boundary treatment and covered with concrete hard standing. The site is accessed via an existing vehicular bridge to the east. Pedestrian access is also secured via the Wandle Trail to the south. The site with located within the Earlsfield L2 Controlled Parking Zone, which operates between 09.30 and 16.30, Monday – Friday. It has a PTAL rating of between 5 - 6.

The Trewint Street Gypsy and Traveller Site and waste disposal centre (within Merton) are located to the south. A railway embankment which is also within the London Borough of Merton (LBM) adjoins to the west. This railway embankment is safeguarded for Crossrail 2. The neighbourhood to the east is comprised primarily of two-storey residential properties. Earlsfield Local Centre is sited 170 metres to the east on Garratt Lane.

Within Merton beyond the railway bridge to the north, a 6-storey residential-led development is under construction alongside the River Wandle (ref 16P/3551). Consent is also in place for a development up to 6-storeys high on the opposite side of the railway embankment to the west in Merton (ref: 16P/2672). A recent site visit confirmed this land is currently being prepared for development. The site is located within an Archaeological Priority Zone. Historic records demonstrate that a gunpowder mill was located on or near the site from the 17th Century. Historic records do demonstrate that various mills which straddled both sides of the River Wandle were sited at the application site from the 18th century onwards.



Wandsworth

Application No:
2019/1083

Address:
Garratt Mills Trewint Street SW18 4HA

Scale:
1:1633



REASON FOR REFERRAL:

The application is referred to PAC by reason of the following section of the paper Scheme of 'Delegations to the Assistant Director, Planning & Transport':

(3) Requires a Section 106 agreement.

CONSTRAINTS:

Flood Zone 2: Medium flood risk zone

Flood Zone 3b: Functional floodplain

Wandle Valley Regional Park

Archaeological Priority Area

High Risk of Surface Water Flooding - Flood Risk Assessment Required

Legally protected species indicated within 10m buffer.

RELATED PLANNING APPLICATIONS:

1950 (50/260) p.p. Granted: use of land and premises for general industrial purposes.

1959 (59/14948) p.p. Granted: erection/retention for limited period of temporary office building

1965 (65/18) p.p. Granted: use of waste land adjoining mills for parking and sale of vehicles.

1965 (65/964) p.p. Granted: retention for further limited period of temporary office building.

1973 (73/11561) p.p. Granted: retention for further limited period of temporary office building

1976 (76/1282) p.p. Granted: continued use of part of site for parking and sale of motor vehicles, retention of temporary office building and for use of a caravan as residential accommodation for night-watchman

1982 (82/s/1336) p.p. Granted: use of open parts of site for storage of commercial vehicles together with provision of fencing on eastern and southern boundaries.

1995 (95/C/0456) p.p. granted: Ground floor lean-to extension to main building, in connection with the approved use of the site for the storage and sale of general goods by auction.

APPLICATION DETAILS:

Planning permission is sought for the demolition of existing buildings and the erection of two blocks between 8 ("Block B") and 6 storeys ("Block A") (including double height ground floor with mezzanine) linked by a single-storey building with mezzanine level, comprising of 292 co-living rooms with internal and external amenity space (Sui Generis), cafe and restaurant use (Class A3), new pedestrian bridge, riverwalk, landscaping, plant, refuse and bicycle stores and associated works.

The proposed development can be summarised as follows:

Building Size and Internal Arrangement**Block A:**

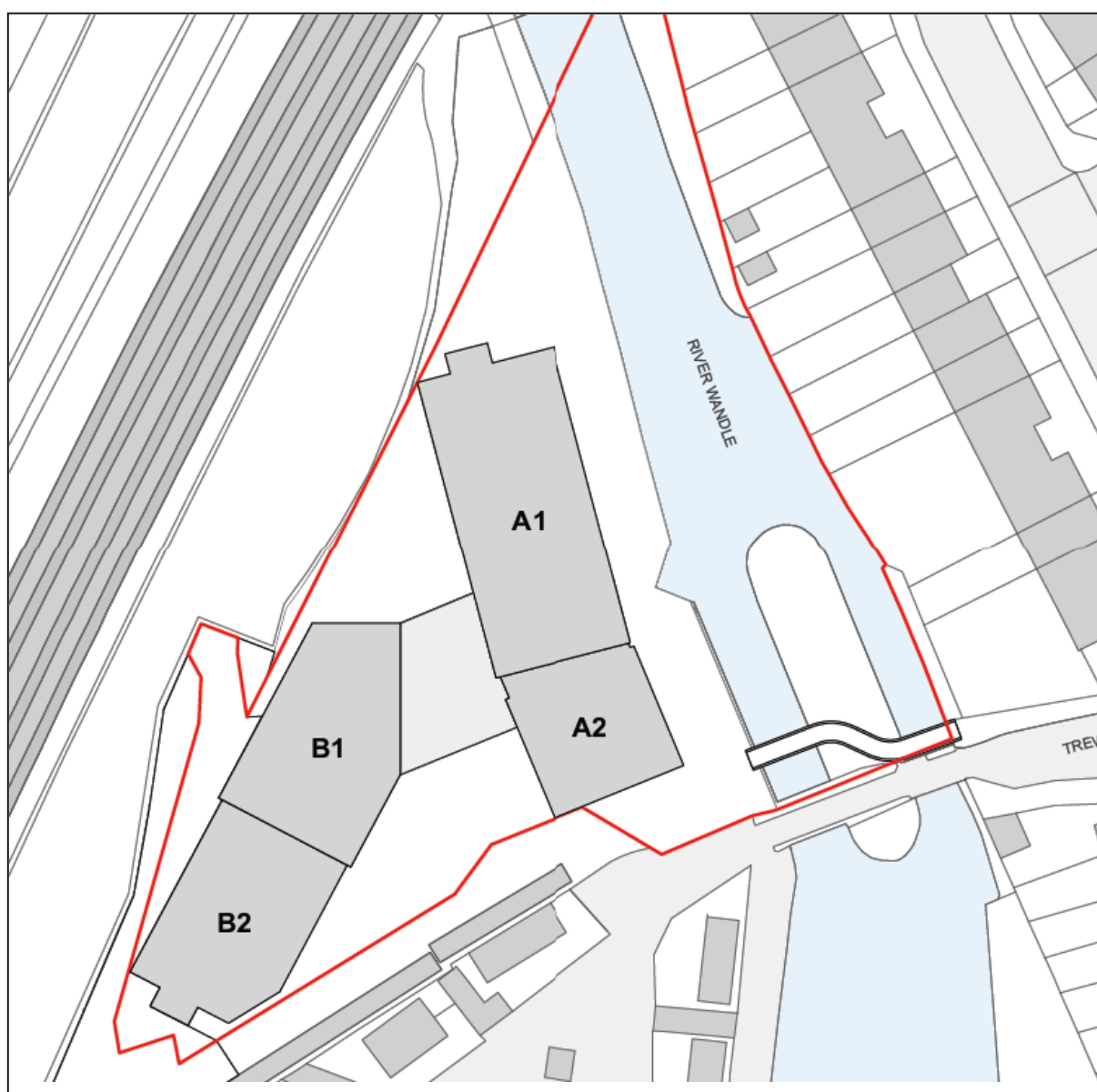
Block A would have between 5 and 6-storeys and it would front the River Wandle to the east. It would measure up to 16.4 metres deep and up to 52 metres wide.

The block would have two components; Block A1 which would be sited to the north and have 6-storeys (including accommodation within a pitched roof), and Block A2 which would be sited to the south and have 5-storeys with a flat roof. Block A1 would measure 36 metres wide, 18.37 metres high to the eaves and 24.5 metres high to the ridge of the roof. A dormer roof would be provided within the rear roof slope, measuring 25 metres wide, 3 metres high and 4 metres deep. Block A2 would measure 14.8 metres wide and 19 metres high.

Block A would be inset from the River Wandle to the east by 8 metres, from the railway embankment to the north by up to 18 metres, and from the railway embankment to the south by 17.6 metres. The block would be inset from the Traveller site to the south by between 8.7 metres and 14.5 metres.

An external fire escape would be provided alongside the northern flank wall of Block A. A total of 140 co-living rooms would be within this block.

Block Arrangement Plan



Block B:

Block B would have between 6 and 8 storeys and it would be built parallel to the railway line to the west. It would measure up to 16.6 metres deep and 51 metres wide.

Block B would also have two components; Block B1 which would be sited to the north, have 8-storeys with a flat roof, and measure up to 29 metres high and 23 metres wide. A green roof would be provided on the roof. The second component, Block B2, would be located to the south and have 6-storeys with a saw-tooth roof. Block B2 would measure 22 metres wide, 21.7 metres high to the eaves and 24 metres high to the ridge of the roof. The centre of the roof would be flat to accommodate plant equipment.

Block B would be inset from Block A to the east by between 9.5 metres and 30 metres due to the orientation of the block. It would be inset from the railway embankment to the west by 2.8 metres and at its closet point from the Traveller site to the south by 9 metres.

An external fire escape would be provided alongside the southern flank wall of Block B. A total of 152 co-living rooms would be within this block.

Podium-Building:

Block A and B would be connected by a single-storey (plus mezzanine) building that would measure between 9 metres and 14.7 metres wide, 16 metres deep and 6 metres high.

Buildings Use:

The internal areas of the development would be used as follow:

Ground Floor

- 102 square metre entrance lobby/ pop-up space;
- 152 square metre café/ restaurant;
- 311 square metres Event/ Co-Working/ Flexible Community Floor Space;
- 89 square metre fitness centre/ gym;
- 190 square metre 308 bicycle store;
- 57 square metre refuse store.

- Mezzanine Floor:
 - 176 square metre café/ restaurant connected to the ground floor;
 - 80 square metre gallery;
 - 142 square metre lounge;
 - 49 square metre yoga studio;
 - 57 square metre quiet zone;
 - 68 square metre laundry/ social room;
 - 23 square metre screen/ cinema room.

- First Floor:
 - 176 square metre shared kitchen with 15 cooking stations and 11 tables;
 - Co-Living rooms;

Second to seventh Floor:

- Co-Living Rooms.

Accessibility

10% of the co-living rooms would be wheelchair accessible and adoptable, with 900mm wide corridors and 800mm wide door openings. These rooms would include enhanced wheelchair circulation space and grab rails. Two lifts each are proposed in Block A and Block B.

Summary of a Co-Living:

Occupants of the proposed development would pay for their co-living rooms and have access to shared communal facilities such as the fitness centres, gallery, yoga studios, social room, shared kitchen and screen room. Occupants would also benefit from access to two private roof gardens and a private enclosed courtyard.

The rent for each room would also include concierge, linen changes, cleaning, security, Wi-Fi and all utilities. Each co-living room includes a bed, kitchenette and en-suite.

Rooms by Tenure and Size:

Three different type of Co-Living rooms are proposed. Standard rooms (avg. size 16sqm), adaptable rooms (avg. size 30sqm) and duplex rooms (avg. 28sqm). The number of rooms by tenure and size is as follows:

Proposed Co-Living Room (Gross) by Tenure and Size

Tenure	Total			
	Standard Room	Adaptable Rooms	Duplex Rooms	
Market	150	28	13	191
Affordable	101	0	0	101
Total	251 (86%)	28 (10%)	13 (4%)	292

140 rooms would be located in Block A and 152 rooms in Block B.

Proposed Floorspace by Use

Use	Floorspace sq ms GIA		
	Existing	Proposed	Net
Co-living Rooms	0	7,569	7,569
Internal Amenity	0	1,572	1,572
Cafe (A3)	0	373	373
Other	600	0	-600
Total	0	9,514	9,514

Design and Materials

The four blocks plus podium-building would be erected as follows:

Block A1:

- Red brickwork and zinc or tiled roof;
- Metal clad dormer windows;
- Roof lights fitted within the pitched roof;
- Full-height dark grey Crittall style windows with acoustic louvres;
- Chamfered brick window reveals;
- Hidden gutter;
- Double height glazing at ground and mezzanine levels;
- Canopies above the ground floor element of the glazing.

Block A2:

- Red brickwork and grey coloured metal balustrade to enclose the proposed roof terrace;
- Double chamfered brick window reveals;
- Full-height dark grey Crittall style windows with acoustic louvres;
- Grey-colour metal I-beam colonnade feature at ground and mezzanine levels;
- Double height glass frontage at ground and mezzanine levels.

- Block B1:

- Red brickwork with grey coloured perforated crown at roof level to enclose plant equipment;
- Chamfered brick window reveals
- Full-height dark grey Crittall style windows with acoustic louvres;
- Double brick soldier course above windows;
- The name 'THE GARRATT' made from projecting brickwork to extend between first to seventh floors;
- Double height glass frontage at ground and mezzanine levels;

- Block B2:

- Red brickwork;
- Full-height dark grey Crittall style windows with acoustic louvres;
- Chamfered brick window reveals;
- Double brick soldier course above windows;
- Double height grey louvered frontage ground and mezzanine levels to enclose services and refuse store.

- Podium-Building

- Double height glazing with grey industrial-style frame at ground and mezzanine level;
- Faceted metal roof garden enclosure with the lettering 'GARRATT MILLS' cut through.

- **Private External Amenity Space:**

- The following external private amenity space would be provided:
- A 170 square metre external roof terrace above the link building;
- A 203 square metre external roof garden above Block A2;
- A 250 square metre enclosed residents' courtyard to the rear in between the two main blocks and link-building.
- Seating and extensive areas of soft landscaping would be provided within each amenity space.

Pedestrian Bridge

The proposed pedestrian bridge would cross the River Wandle in a z-shape by continuing an existing footpath on Trewint Street to the east of the river. The bridge would extend across the island within the centre of the river, measuring 2.1 metres wide and 21 metres deep. The floor of the bridge would be perforated to allow light to continue to pass to the river below. Lighting would be provided at floor level. The bridge would be enclosed by a 1.1metre high steel balustrade.

One existing Category C tree would be felled to accommodate the bridge.

Public Realm including River Walk

The publicly accessible external areas of the development would include the following:

Front Yard

A large area of predominantly hardstanding to the south of the proposed buildings that would include the main arrival space to the development. This area would include shared surfaces for both pedestrians, servicing vehicles including delivery bays. Two disabled car parking spaces would be provided in this area. A small area of soft landscaping and trees would also be provided here.

River Island

The island would be tidied up, with meadow and shrub planting. Members of the public would walk across the island on a pedestrian bridge only.

Eastern River Walk

The river walk would be sited to the east of Block A and wrap-around the northern elevation of this block. When measured from the east elevation of Block A it would measure between 5.3 metres and 8.1 metres wide. It would wrap-around the north elevation of the block by 14.3 metres. Benches, hard and soft landscaping and trees would be provided in the area.

Riparian planting would also be planted along the river bank adjacent to the river walk.

River Walk Northern Extension

A study to continue the Wandle Trail underneath the existing railway bridge to the north, to connect to Ravensbury Terrace, has been undertaken by the Applicant. Four options have been explored to accommodate this extension as follows:

- Retain and improve the existing bank under the railway bridge and installing a balustrade;
- Retain the existing bank plus adding a cantilevered structure to create an enhanced riverwalk width;
- Installing a suspended walkway under the railway bridge. This walkway would be affixed to the railway bridge;
- Installing a floating bridge that would rise and fall with water levels.

The Applicant proposes to safeguard land in the northern part of the application site to accommodate a northern extension. A financial contribution which would pay towards the delivery of the riverwalk extension has also been secured.

Boundary Treatment and Trees

The existing stacked shipping containers along the southern boundary with the Traveller site would be retained. A green wall would be installed on the northern side of the containers fronting the application site. One tree would be felled as part of the development and a total of 39 new trees proposed to be planted throughout the site.

Refuse and Recycling Storage

Three refuse and recycling stores would be provided within the ground floor of the development. This includes a residential store within the ground floor of Block B with space for 19 euro bins, plus a residential store for 4 euro bins in Block A and a commercial bin store within Block A with space for 2 euro bins. Waste would be collected by a private contractor. A total of 25 no 1100litre bins would be accommodated within the site.

Density

The Density of the development has been calculated using the net residential area with the Public Transport Accessibility Level (PTAL) for the site being between 4 and 5. Given the characteristics of the locality, with dense terraced housing and a mixture of uses, the locality is considered an urban setting. A residential density between 200 - 700 habitable rooms per hectare is therefore applicable. It should be noted that the London Plan density matrix also includes a units per hectare recommendation, however this is not relevant in this instance due to the provision of co-living rooms rather than residential dwellings.

Note: the density matrix is provided for information purposes in this instance, as the matrix is intended to be applied to residential dwellings rather than co-living developments. It can nevertheless be confirmed that the development would have 898 habitable rooms per 0.325 hectares.

Access

Vehicular access to the site would be via the existing vehicular bridge which crosses the River Wandle to the east of the application site. Cyclists entering the site would also utilise this bridge. Pedestrian access to the site would be secured by the new pedestrian bridge that would be erected above River Wandle and island. The provision of an extended river walk to the north of the application site beneath the railway bridge would also provide additional pedestrian access should this river walk extension be implemented.

Vehicle and Cycle Parking

The proposed development does not provide any vehicular car parking spaces excluding two disabled spaces which would be provided to the south of Block A. A 190 square metre 308 bicycle store is proposed within the ground floor of the development, this bicycle store includes 8 visitor cycle parking spaces. Space for a further 22-bicycles at 11 stands would be provided adjacent to the River Wandle.

Construction

The development is expected to be constructed over a period of two years, with construction expected to take place 08:00 - 18:00 on weekdays and 08:00 - 13:00 Saturdays. Construction vehicles would access the site from Trewint Street to the east with traffic marshals in place. The submitted Construction Management Plan identifies that some parking bay suspension may be required on Trewint Street.

Revised and Additional Information Received

- Additional details regarding kitchen provision submitted, with the first-floor plan updated to correspond these with details;
- A draft Community Investment Programme submitted to the Council. Updated ground floor plan to include annotation for community space also submitted;
- Updated Bat Survey submitted (to address ecology concerns);
- Updated Preliminary Ecological Appraisal Submitted (to address ecology concerns);

Community Infrastructure Levy Estimate

CIL Estimate	
Mayoral	Borough
£823,072.00	£0

The actual amount of CIL can only be confirmed once all relevant details are approved and any relief claimed.

SUPPORTING DOCUMENTS SUBMITTED:

- Planning Statement.
- Design & Access Statement.
- Heritage, Townscape and Visual Impact Assessment.
- Flood Risk Assessment.
- Financial Viability Report.
- Geo-Environmental Assessments.
- Acoustic Assessment.
- Odour Assessment.
- Transport Assessment including pedestrian flow assessment.
- Delivery and Servicing Plan.
- Travel Plan.
- Framework Construction Management Plan.
- Daylight, Sunlight and Overshadowing Assessment.
- Air Quality Assessment.
- Sustainability Statement including BREEAM Pre-assessment.
- Energy Statement.
- Statement of Community Involvement.
- Archaeological Desk Based Assessment.
- Updated Preliminary Ecological Appraisal.
- Ecological Management Plan.
- Pedestrian Level Wind Desk-based Assessment.
- Preliminary Lighting Strategy.
- Site Waste Management Plan.
- Health Impact Assessment.
- Management Plan.
- Utilities Statement.
- Tree Survey and Arboricultural Impact Assessment
- Updated Bat Survey Report.

CONSULTATION:

Number of letters sent	1,429
Site Notice	Yes (x5)
Press Notice	Yes
Number of responses received	104
Number of objections	93
Number of comments	0
Number of letters of support	11

Consultation Summary

Objection Comments:

Design

- The development is maximising the development plot;
- The building is too high and bulky, and it will dominate the skyline;
- Town centres is where tall buildings should be located;
- The Design Review comments demonstrate they are unaware of the Traveller site;
- It is concerning that the Design Review Panel didn't raise concerns regarding the height of development.

Principle

- The development is out of keeping with the family orientated neighbourhood;
- The proposal will accommodate a transient population;
- There may be anti-social behaviour and litter problems associated with the development;
- The London Plan restricts leases to 6 months;
- 1-year tenancies should be secured;
- The proposal does not protect industrial land.

Transport and Access

- There will be increased car parking and traffic congestion pressures, including rat-run deliveries (including Deliveroo, Uber, Amazon etc);
- The CPZ does not provide evening or weekend protection;
- The existing roads will not be able to accommodate construction traffic;
- There will be increased pressures on Earlsfield Station. The estimated number of users is unrealistic;
- The Council should secure monies for Earlsfield Station;
- Access to the site is poor via one bridge;
- There should be disabled visitor car parking spaces;
- No motorcycle parking is provided;
- Space for tricycles and tandems is not provided;
- The visitor cycle stands are not covered;
- Consideration of the cumulative transport impacts should be undertaken;
- No information regarding servicing has been submitted;
- The proposed bridge is incorrectly sited;
- S106 agreement should require the develop to may for upgrading the Wandle Trail;
- Uncertainty regarding ownership of the bridge which may not be able to accommodate traffic;
- A condition restricting hours of lorry delivers should be applied.

Air Pollution

- Construction will add to existing air quality issues;
- Air pollution will harm users of Garratt Park and local primary schools.

Ecology and Sustainability

- Shadows cast by the development will harm the ecology of the River Wandle;
- The proposal will upset the local ecosystem;
- The development should be BREEAM Excellent.

Housing/ Affordable Housing

- The proposal does not provide long term affordable housing;
- The type of accommodation is not the answer to the housing crisis;
- London needs social housing;
- The proposal should accommodate key workers;
- The site should accommodate family housing.

Amenity Impacts

- The proposal will result in overlooking;
- Noise and disruption will be substantial;
- The proposed development will create a sense of enclosure.

Standard of Accommodation

- Lourves are proposed to mitigate noise from the railway line. This is not suitable;
- The units are undersized.

Other Matters

- The existing Collective site in Old Oak causes anti-social behaviour;
- There will be accumulative impacts associated with other developments in the area;
- Local services, including GP surgeries, will be harmed;
- There is no plan to create additional amenities;
- The development may not be viable and therefore be a 'white elephant';
- The proposal will create a gated community;
- In addition to a laundry room, dry rooms should also be provided;
- Staff lockers should be provided;
- The proposal will stretch the local water supply;
- The proposal will harm local property values;
- Details of communal space per person should be provided;
- The development is a hotel which offers nothing to the community;
- The site should accommodate schools and shops;
- The café/ restaurant is in a dead-end and it should have hours restricted to 11pm;
- The application documents reference the Banham Building which is inappropriate due to lack of consultation;
- The Applicant did not consult all residents prior to submission;
- Key workers won't want to live at the site;
- The management plan does not include servicing demands;
- Consideration should be had to off-site modular building;
- The proposal shouldn't be a cash cow;
- The use of the facilities for residents only removes wider benefits.

Support Comments:

- Welcome the opportunity for renters to live in the development;
- The proposals from The Collective offer professionally managed accommodation, as oppose to variable accommodation from landlords;
- The existing site is very run down, the proposals will improve this;
- The proposals will deliver much needed homes;
- The proposals will promote community spirit and add diversity;
- The proposal will help local business;

- The proposal will address loneliness;
- New retail provision is welcome;

Petitions

Trewint Street Traveller Site (Petition of 9 occupants):

- The proposal will create a complete loss of outlook and privacy;
- The proposal will create a sense of enclosure;
- The adjoining recycling centre causes pollution and the construction of the proposal will add to this.

Amenity Groups

The Trewint Street Community:

Principle and Design:

- The site is not identified for tall buildings;
- The buildings are too big, and they will result in the loss of enjoyment of open spaces;
- The proposal constitutes overdevelopment;
- The London Plan requires the 'need' for the proposal to be demonstrated;
- Using the Haselmere site as precedent is unreasonable;
- The proposed café will undermine Earlsfield Local Centre.

Transport/ Access:

- There will be journeys associated with Deliveroo, Amazon and Uber. This will cause congestion and air pollution issues;
- The site should be safeguarded as per TfL comments;
- The submitted management plan is not satisfactory;
- The Transport Assessment is not accurate;
- The Council should insist on the continuation of the Wandle Trail;
- The existing bridge is safety risk to cyclists and pedestrians;
- The proposed bridge is incorrectly sited;
- Areas with public rights of way are not clear;
- The CPZ does not provide protection at evenings and weekends.

Standard of Accommodation:

- The provision of one kitchen is not convenient;
- The proposals do not comply with the minimum space standards;
- A DJ booth is shown on the mezzanine levels. This will cause noise disturbance;
- The fifth-floor terrace is a noise concern. The 2 metre enclosure addresses overlooking only.

Impact upon Amenity:

- The proposals will result in overlooking;
- The proposal will result in the loss of sunlight;
- The proposal will result in overlooking and a sense of enclosure, particularly into the traveller site.

Ecology and Sustainability:

- There will be overshadowing across the River Wandle;
- The Preliminary Ecological Appraisal does not consider water quality

- Sustainability wise, the development is being measured against non-residential developments.

Construction Impacts:

- A 2-year construction phase will cause disturbance to residents through air pollution and traffic congestion;
- There will cause implications for pedestrians and cyclists crossing the River Wandle;
- Details of where construction vehicles will park should be provided.
-

Other Matters:

- The Applicant has communicated poorly with the community including falsified support comments;
- Query how the proposal got through pre-app stage;
- The kitchen size of the restaurant is not suitably sized;
- The drawings do not accurately show the size of plant equipment;
- The wind assessment considers immediate impacts only;
- Concern what impact the development will have on the local sewage system;
- Distance to travel to GPs surgeries of 2km is unreasonable;
- The submitted management plan is not satisfactory.

Reference is also made to London Plan policies 7.4, 7.7, Core Strategy policies SSAD1, IS3, IS4 and IS5. The London Plan and draft London Plan is also cited in respect of tenancy lengths.

London Gypsies and Travellers:

- Object to the proposal;
- The adjoining traveller site is already affected by air and noise pollution;
- The construction phase of development will aggravate environmental impacts;
- The proposal does not contribute towards affordable housing.

Elected Constituency MP and Members

Dr. Rosena Allin Khan MP:

- The development will be imposing on the traveller community;
- Concern regarding true affordable housing;
- The size of units is a concern;
- The short-term nature of the use would negatively impact the community;
- The proposal will severely limit the delivery of Crossrail 2.

Cllrs Henderson and Rigby: Object to the proposal development on the following grounds:

- There is a need for a spatial strategy for Earlsfield;
- The proposed rooms are of a small size. They do not comply with the relevant standards;
- There is no apparent provision of affordable housing;
- More information on the concept should have been provided;
- Not convinced policy DMH9 can be relied upon as this is for HMOs. Question whether the development would accord with this policy;
- 3-month tenancies could create an itinerant population;
- The proposal will tower over neighbouring properties, notably the traveller site;

- The size of the development is inappropriate;
- Neighbouring street will experience increased traffic congestion;
- Support Crossrail 2's objection;
- The development could block daylight into the River Wandle;
- The proposal does not address the Earlsfield Gap.

Cllr Graham:

- Concern regarding the massing, height and dominance of the proposal;
- The proposal will cause overshadowing, loss of light and privacy;
- Impact upon local parking will be enormous;
- Trewint Street will not be able to accommodate HGVs;
- Robust Travel Plan required;
- Query ownership of the Trewint Street bridge;
- Concern regarding the nature of short term lets and the sustainability of the community.

Cllr Edward Gretton (London Borough of Merton): The development represents the opportunity to close the 'Earlsfield Gap' in terms of extending the Wandle Trail north.

Internal Consultees

Assistant Director of Housing Strategy and Development (ADHSD): The proposed development will secure 35% of co-living rooms (102 rooms in total) at a discount of 10%, 20% and 30%. The ADHSD notes that this application provides a housing option which has the potential to provide residents, particularly working residents, with what should be a quality assured housing option.

The Council in this instance has been able to negotiate an affordable housing offer which provides a genuinely affordable option for households, living and/or working in the Borough, which is significantly better than any offsite option that could be offered and will help meet the need and demand for intermediate low-cost rent housing. The offer is particularly beneficial in that it is inclusive of service charges. Support will continue to be predicated and contingent on the scheme being demonstrated to be well managed and encouraging a sense of place, home and community through the services offered and the management plan put in place that will be agreed by the Council. The scheme is well located, within easy walking distance of Earlsfield station, four bus routes and access to local shops and the ADHS&D recognises the improved pedestrian access and other environmental improvements to the area the application proposes.

Lead Local Flood Authority: The submitted Flood Risk Assessment is satisfactory.

Enable (Trees): The submitted Arboriculture Method Statement identifies 22 trees, however most of which are outside the application site. Further details for the pruning of these trees are required and should be secured by condition. The removal of one low quality tree is reasonable. Details of Root Protection are also required, as are further details of proposed planting including 39 new trees identified in the Ecological Management Plan.

Enable (Ecology): The Preliminary Ecological Appraisal and Bat Survey need updating. An Ecological Management Plan can only be produced once landscaping details are finalised. Conditions recommended to secure survey work consider impacts upon species, to minimise

construction impacts of the development, to secure landscaping biodiversity value and to ensure lighting does not harm wildlife.

Note: an updated Bat Survey and Preliminary Ecological Appraisal were submitted in response to some of these concerns.

Environmental Services (Noise): No Objections to the proposals are raised. However, a condition to secure noise insulation measures in accordance with the submitted Noise and Vibration Assessment is required.

Environmental Services (Air Quality): The submitted Air Quality Assessment is not exhaustive and a pre-commencement conditions securing a Dust Management Plan and construction monitoring are therefore required.

Environmental Services (Contamination): No Objections raised. However, a prior-commencement condition further details of a site investigation is recommended. A condition regarding Japanese Knotweed is also recommended.

Waste: Concern regarding the level of bin provision. The adopted SPD would require 20 x 1100 litre refuse bins and 8 x 1280 litre recycling bins. Concern also regarding bulky goods storage.

External Consultees

Environment Agency: Object to the proposal based upon insufficient information regarding naturalisation of the river bank. The applicant should look to re-naturalise the concrete sloping revetment of the left bank of the river. The proposal also represents the opportunity to restore the watercourse to a natural channel. The EA otherwise supports the proposals to increase the bio-diversity of the site, with green roofs, bird boxes.

Historic England (Greater London Archaeological Advisory Service (GLAAS): The main on-going archaeological interest is in respect of the historic mill use of the site and stratified material below ground level. This interest can be secured by planning condition

Transport for London (TfL): TfL would support the Council refusing planning permission on the grounds that the land is required for the future delivery of Crossrail 2. Concern has also been raised regarding the proposed residential use could comprise 24-hour operation of Crossrail 2 and the Agent of Change principle is applicable.

TfL also recommend that the existing bridge is not safe for both vehicular and cyclist usage. Concerns have also been raised regarding the siting of the main entrance to the development and the proximity of the servicing area to the front of the development. TfL accepts that café/restaurant is likely to deliver a low number of trips. Finally, TfL recommend that additional wheelchair accessible car parking spaces should be provided in accordance with policy.

NHS London Healthy Urban Development Unit: The proposal generates a S106 capital cost of £108,300.

Metropolitan Police Designing out Crime: the crime rate in Wandsworth is lower than the London average, however they are slightly higher in the immediate area than the borough average; the Applicant should consider secure boundaries; each block should have access control; lighting and CCTV should be integrated; careful hardstanding treatment in the front

yard will discourage unauthorised parking; consideration for bollard installation; the riverwalk boundaries will need to be high enough to prevent people falling into the river; riverwalk should include lighting; open public areas are susceptible to anti-social behaviour if not gated off; private amenity space should be fobbed and be subject of a management plan; street furniture should deter street drinkers and rough sleepers; commercial space should be well-staffed and CCTV provided; the mix of uses will encourage surveillance; additional internal lobby doors are recommended, including revolving door; emergency access should be secured; consider construction related crimes.

Thames Water: No objection regarding Foul Water sewage network. Concerns regarding the local water network infrastructure are raised and prior occupation condition requiring details of required network upgrades or details of a housing and infrastructure phasing plan.

Natural England: No objection to the proposal.

London Borough of Merton: No response received.

South East Rivers Trust (SERT) (Formally the Wandle Trust): The Ecological Survey has key omissions; it has not considered the ecological impact upon the river; there is no information on whether the development will impact the status of the river; the assessment does not include brown trout or other protected species. SERT also recommend an extension to the Wandle Trail, the impacts upon shadowing upon the river should be assessed, there should be no new light cast into the river and full SuDs measures should be implemented. Concern is also raised regarding run-off into the river from the front courtyard and the management of invasive species should be managed. Regarding construction impacts, SERT raised concerns about sediments landing in the river and the noise and vibration impacts of the proposal. The provision of a river walk is welcomed.

Wandle Valley Forum: the industrial style design is welcomed, however the proposal is much higher than previous buildings; a café and public frontage facing the Wandle is welcomed; the proposal represents the opportunity to create a better welcome between Trewint Street bridge and the Wandle Trail; the proposal to extend the Wandle Trail north is warmly welcomed; the proposal should improve access to Durnsford Road Recreation Ground; net biodiversity gain is welcomed but further greening of the river bank should be implemented; concern regarding lighting impacts upon the river.

London Fire Brigade: 1 fire hydrant is required for the site. The hydrant should be sited on a footpath.

Independent Consultants

Climate Integrated Solutions (Sustainability): The proposed development will achieve a minimum of 35% reduction in Co2 on site. The development can achieve BREEAM Excellent.

BNP Paribas Real Estate (Viability Consultants): The affordable housing offer results in a deficit of £869,259 against the viability benchmark.

Design Review Panel (DRP) (dated 20th December 2018):

The DRP response can be summarised as follows:

- The site has fantastic opportunity although is awkward;
- The general approach of the concept of a family of buildings is welcomed;

- The height of the tallest buildings in proximity to the site is noted. The height of the seven (plus double height ground floor) is difficult to justify;
- Layout and use: comfortable with the configuration with support for active frontages facing the Wandle. There is logic in where the entrance is main entrance is sited;
- Massing: Greater rationale to justify the height is required. However, a variety of heights is welcomed, but having the higher block to the rear should be justified. The height of Block A is supported, given the emerging context.
- Architectural Design: Reference to mill buildings is supported. Although there are different façade design and materiality, the proposal reads as a family. The double-height ground floor gives visual strength is well considered.
- Landscaping and Public Realm: The Panel were pleased to see a series of different spaces, including the enclosed garden to the rear. The Applicant are encouraged to discuss further a northern river walk extension. Improvements to the existing bridge should be explored further, and the softening of the southern border with the Traveller site is encouraged. Finally, enhanced riparian habitat to the river and existing island are welcomed.

RELEVANT PLANNING POLICIES:

National Planning Policy Framework (NPPF) (2019);

Draft London Plan (2017) Policies: H18 (Large-scale purpose-built shared accommodation), T3 (Transport Capacity, connectivity and safeguarding).

London Plan (2016) Policies: 3.3 (Increasing housing supply), 3.4 (Optimising housing potential), 3.5 (Quality and design of housing developments), 3.8 (Housing choice), 3.9 (Mixed and balanced communities), 3.10 (Definition of affordable housing), 3.11 (Affordable housing targets), 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes), 3.13 (Affordable housing thresholds), 4.1 (Developing London's economy), 5.1 (Climate change mitigation), 5.2 (Minimising carbon dioxide emissions), 5.3 (Sustainable design and construction), 5.5 (Decentralised energy networks), 5.6 (Decentralised energy in development proposals), 5.7 (Renewable energy), 5.9 (Overheating and cooling), 5.10 (Urban greening), 5.11 (Green roofs and development site environs), 5.12 (Flood risk management), 5.13 (Sustainable drainage), 5.14 (Water quality and wastewater infrastructure), 5.15 (Water use and supplies), 5.17 (Waste capacity), 5.18 (Construction, excavation and demolition waste), 5.21 (Contaminated land), 6.3 (Assessing effects of development on transport capacity), 6.5 (Funding Crossrail and other strategically important transport infrastructure), 6.7 (Better streets and surface transport), 6.9 (Cycling cycle parking minimum standards), 6.10 (Walking), 6.11 (Smoothing traffic flow and tackling congestion), 6.13 (Parking), 7.1 (Building London's neighbourhoods and communities), 7.2 (An inclusive environment), 7.3 (Designing out crime), 7.4 (Local character), 7.5 (Public realm), 7.6 (Architecture), 7.7 (Location and design of tall and large buildings), 7.8 (Heritage assets and archaeology), 7.9 (Heritage-led regeneration), 7.11 (London view management framework), 7.14 (Improving air quality), 7.15 (Reducing noise and enhancing soundscapes), 7.19 (Biodiversity and access to nature), 7.21 (Trees and woodlands), 7.27 (Blue Ribbon Network: supporting infrastructure and recreational use), 7.28 (restoration of the blue river network) 8.2 (Planning obligations) and 8.3 (Community Infrastructure Levy).

Core Strategy (2016) Policies: PL1 (Attractive and distinctive neighbourhoods and regeneration initiatives), PL2 (Flood risk), PL3 (Transport), PL4 (Open space and the natural environment), PL5 (Provision of new homes), PL6 (Meeting the needs of the local economy),

PL9 (River Thames and the riverside), PL10 (The Wandle Valley), IS1 (Sustainable development), IS2 (Sustainable design, low carbon development and renewable energy), IS3 (Good quality design and townscape), IS4 (Protecting and enhancing environmental quality), IS5 (Achieving a mix of housing including affordable housing), IS6 (Community services and the provision of infrastructure) and IS7 (Planning obligations).

DMPD (2016) Policies: DMS1 (General development principles), DMS2 (Managing the historic environment), DMS3 (Sustainable design and low-carbon energy), DMS4 (Tall buildings), DMS5 (Flood risk management), DMS6 (Sustainable drainage systems), DMS7 (Consultation with the Environment Agency), DMH4 (Residential development including conversions), DMH8 (Implementation of affordable housing), DMH9 (Hostels, staff and shared accommodation), DMTS1 (Town centre uses), DMTS2 (Out-of-centre development), DMTS13 (Offices), DMO3 (Open spaces in new development), DMO4 (Nature conservation), DMO5 (Trees), DMO6 (Riverside development), DMT1 (Transport impacts of development), DMT2 (Parking and servicing), DMT3 (Riverside walking and cycling routes) and DMT4 (Land for transport functions).

Wandsworth Supplementary Planning Documents (SPDs): Housing; (2016); Planning Obligations (2015); Refuse and Recycling SPD (2014).

Mayors Supplementary Planning Guidance (SPGs): Affordable Housing and Viability (2017); Housing (2016).

PLANNING CONSIDERATIONS:

The main considerations material to the assessment of this application have been summarised as follows:

- Principle including Crossrail 2, proposed shared accommodation and restaurant uses;
- Design, Appearance, Heritage, Tall Building Assessment and Landscaping;
- Affordable Housing
- Amenity Impacts
- Standard of Accommodation
- Highways and Transportation
- Impact upon Neighbouring Residential Amenity
- Highways and Transportation
- Sustainability
- Ecology
- Flood Risk
- Air Quality and Land Contamination
- Flood Risk;
- Arboriculture;
- Air Quality;
- Land Contamination;
- Waste Management;
- Arts and Culture
- Archaeology
- Health;
- Utilities and Fire Safety;
- Statement of Community Involvement

- Other Matters
- S.106 planning obligations.

1 Principle of Development

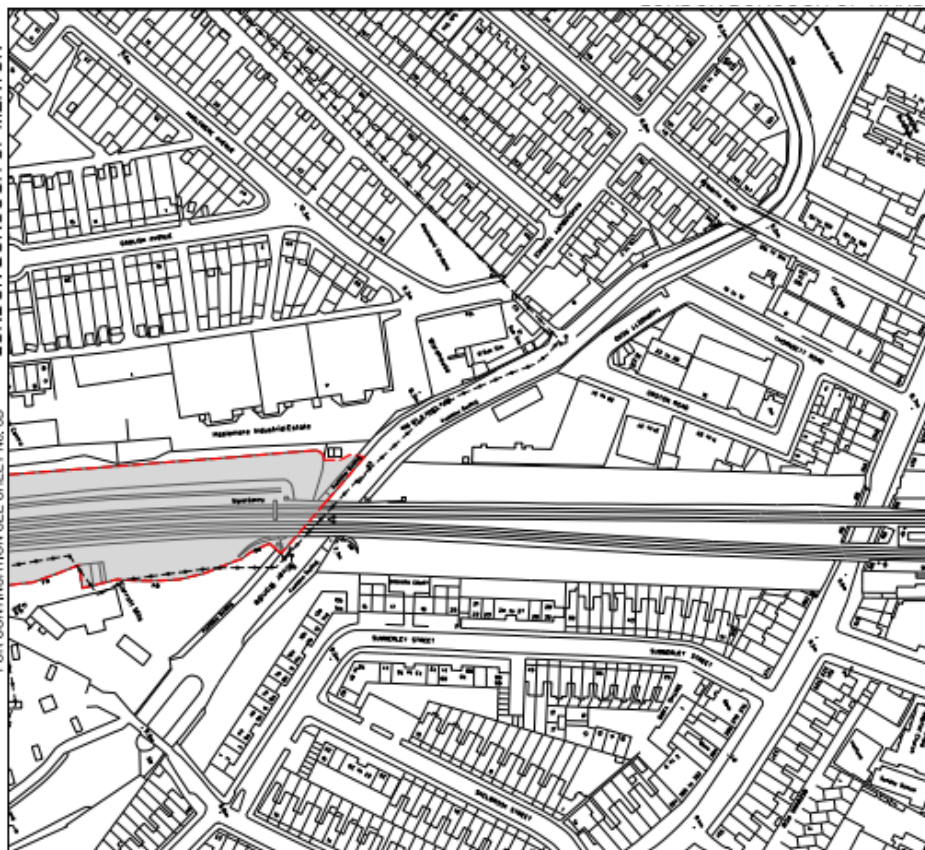
- 1.1 This section summarises the principle of the proposed development in respect of loss of the existing uses, Crossrail 2 safeguarding, principle of the shared-accommodation and proposed restaurant use.

Loss of the Existing Industrial Uses

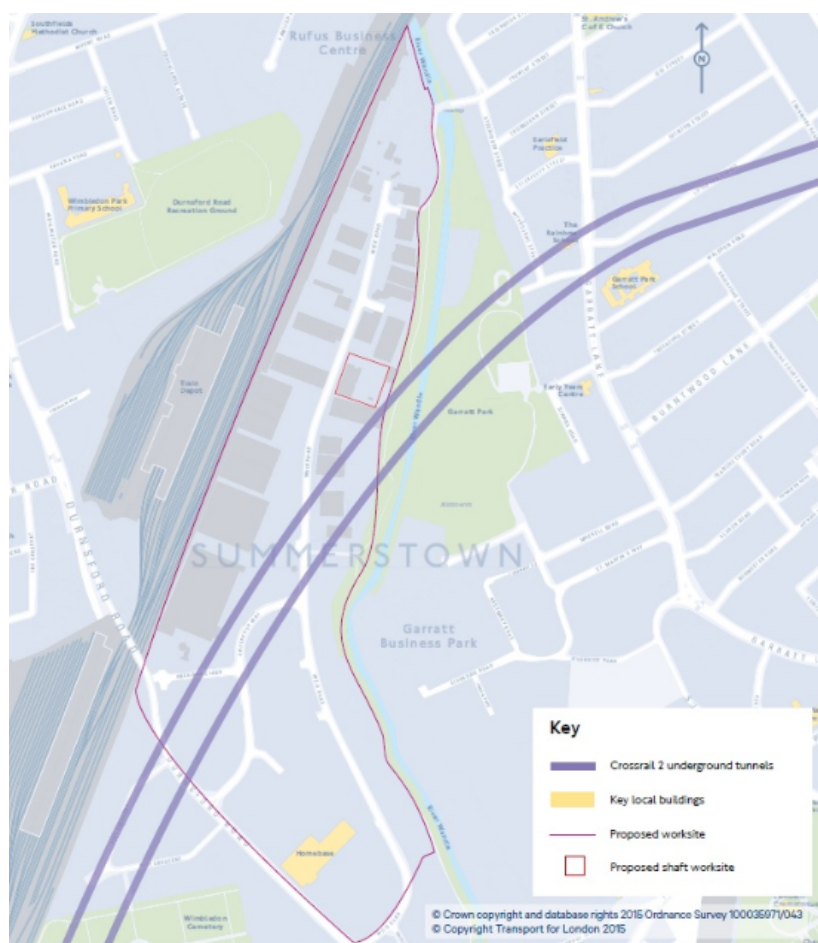
- 1.2 As identified under the site details heading of this report, the site is currently used for storage purposes (Class B8). As the site is not subject of any spatial policy protection, the principle of the loss of the existing industrial uses is acceptable.

Crossrail 2 Safeguarding

- 1.3 As identified under the site details heading of this report, the existing railway line which adjoins the application site to the west was safeguarded for Crossrail 2 in 2015.
- 1.4 A Safeguarding Direction is a formal process undertaken by the Department for Transport to protect land required for new infrastructure projects from future development.
- 1.5 The Safeguarding Direction issued by the Department for Transport in March 2015 for Crossrail 2 requires local planning authorities to consult Transport for London on planning applications within the boundaries shown on the safeguarding plans before granting planning approval.
- 1.6 The map below shows the area of land adjacent to the application site (shaded grey) which is subject to the 2015 Safeguarding Direction:



- 1.7 As well as helping to protect the land needed to build and operate the railway, the Safeguarding Direction also triggers 'Statutory Blight'. This means that property owners and occupiers within the safeguarded areas may be eligible to serve a Blight Notice asking Transport for London to buy their property, prior to it being needed for construction, for the price it would be worth if Crossrail 2 was not being built.
- 1.8 It is important to note that Statutory Blight does not apply to properties outside of the safeguarded area and also that the Safeguarding Direction does not authorise the compulsory acquisition of land or confer the powers to start construction.
- 1.9 In 2015, Transport for London also identified land to the east of the railway as a preferred location for a Crossrail 2 tunnel access shaft and railway depot. This land includes the application site, the Trewint Street traveller site and Weir Road Industrial Estate to the south.
- 1.10 The map below is from Crossrail 2's Weir Road proposed worksite – 2015 Consultation and shows the extent of the shaft and stabling facility at Weir Road.



- 1.11 The 'Shafts and Portals' pages of the Crossrail 2 website state that the shaft is required to provide tunnel ventilation, access for the fire and rescue services and a safe evacuation route for passengers in the event of an emergency.
- 1.12 It also states:
- 1.13 'Although no decision has yet been made, should we decide the route of Crossrail 2 will go via Balham we would need two shafts at even intervals between Wimbledon and Balham stations.
- 1.14 It goes onto say:
- 1.15 'We would also use the Weir Road site to provide "stabling" (i.e. parking) for trains, with facilities for train washing and cleaning), as well as a depot for maintaining these trains and a shaft providing ventilation and emergency access to the tunnels. The site would also support Crossrail 2 tunnelling works. Further work is under way to work out the best layout for the Weir Road site. In addition, we are still also considering various alternative sites following concerns raised over its suitability during the 2015 consultation.'

How does Crossrail 2 affect the consideration of the application?

- 1.16 For sites within the Safeguarding Direction, TfL has the right to be consulted by the Council on all planning applications within the Crossrail 2 Safeguarding Limits. When consulted TfL may respond;
- 1.17 (a) with no comments;
- 1.18 (b) request the application be refused;
- 1.19 (c) request standard conditions; or
- 1.20 (d) request specific conditions relating to the particular development.
- 1.21 In response to this application, TfL submitted a letter on the 28th June 2019 in which it states a refusal would be supported. TfL acknowledge that the application site is outside of the 2015 Safeguarding Direction but say that the land has been identified as being required for the future delivery of Crossrail 2. TfL say that since 2015, further engineering work has been undertaken and the project is much more informed TfL is of the view that the entirety of the Weir Road site will be required for the delivery of the project.
- 1.22 In that letter, TfL say that policy 6.2 in the current London Plan and policy T3 in the emerging London Plan state that new development that does not provide for safeguarding for transport schemes should be refused. TfL say that the term 'safeguarding' as used in this policy should not be confused with the Secretary of State Safeguarding Direction, and should be applied in accordance with its definition to 'protect'.
- 1.23 TfL conclude the letter by recommending that the Council refuses planning permission.

- 1.24 As with all applications, the starting point is that they should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 1.25 In this respect, Policy 6.2 of the current London Plan says that for planning decisions:
- 1.26 'Development proposals that do not provide adequate safeguarding for the schemes outlined in Table 6.1 should be refused.'
- 1.27 Note that Crossrail 2 is listed in Table 6.1.

What is considered adequate is a matter of planning judgement.

- 1.28 The London Plan refers to the Mayor's Land for Industry and Transport SPG (September 2012), which provide guidance regarding safeguarding land to London boroughs in planning making. Paragraph 13.3 states:
- 1.29 TfL is currently developing proposals for a new northeast to southwest rail line as this remains a highly congested corridor. London Plan Table 6.1 identifies this as scheme for implementation later in the Plan period. Statutory safeguarding is in place for the Chelsea-Hackney Line and it is essential that this safeguarding remains whilst route options are being developed and this should be reflected in the relevant borough DPDs. Boroughs that could benefit from this scheme should have policy support in their DPDs. Beyond the statutory safeguarding limits, it may be appropriate for relevant borough DPDs to identify and safeguard specific sites that could be required in future to enable delivery of the line. Consultation with TfL is recommended to determine the latest status of this project.
- 1.30 Paragraph 13.5 states
- 1.31 Table 6.1 sets out a number of schemes that are required to deliver the expected growth in rail demand in London. Boroughs should identify the schemes (and any additional schemes in the London and South East RUS and 'Delivering the Mayor's Transport Strategy: National Rail in London' where appropriate) that may have implications for land in their boroughs and should provide policy support and, where appropriate, safeguarding within their DPDs. Consultation with TfL and other authorities (including those outside London where appropriate) is recommended at an early stage to determine current scheme status....
- 1.32 This is reflected in policy SPG13 of the Land for Industry and Transport SPG:
- 1.33 In implementing London Plan policies, the Mayor will and boroughs, TfL and other partners should:
- 1.34 - include, or continue to include, policies on the safeguarding and delivery of Crossrail, Crossrail 2, High Speed 2 and other National Rail schemes within Development Plan Documents (DPDs);
- 1.35 With regard to decision making, policy T3 of the emerging London Plan says that:

- 1.36 B - Development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:
- 1.37 1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)
- 1.38 2) identifying and safeguarding new sites and route alignments, as well as supporting infrastructure, in order to provide transport functions and planned changes to capacity, including proposals identified in Table 10.1
- 1.39 3) safeguarding London's walking and cycling networks the Walk London Network protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames.
- 1.40 C - Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1 or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused.
- 1.41 D - In Development Plans and development decisions, particular priority should be given to securing and supporting the delivery of upgrades to Underground lines, securing Crossrail 2, the Bakerloo line extension, river crossings and an eastwards extension of the Elizabeth line. Note that Table 10.1 includes Crossrail 2.
- 1.42 Policy T3 is more broad ranging than policy 6.2 in its application to development decisions, particularly paragraph D, which says priority should be given to securing Crossrail 2, amongst other transport projects. As an emerging policy, T3, does not carry the force of a development plan policy but it is a material consideration which carries weight in the decision making process. How much weight depends on assessing the policy under paragraph 48 of the NPPF, which states:
- 1.43 Local planning authorities may give weight to relevant policies in emerging plans according to:
- 1.44 a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- 1.45 b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- 1.46 c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
- 1.47 Core Strategy Policy PL3 states:

- 1.48 a. Improvements to public transport will be supported including enhanced capacity on rail and underground lines, improved bus and rail services and access to stations, and enhanced riverbus services.
- 1.49 b. Clapham Junction will be upgraded and improved as a major transport interchange through investment by the Council, TfL, train operators and developers (see PL13).
- 1.50 c. The Council will promote major transport infrastructure schemes including Crossrail 2, the Northern Line Extension to Battersea and improved rail links between South London and Heathrow, to be delivered by other parties including central government, TfL, public transport companies and private developers.
- 1.51 d. Land will be safeguarded for future transport functions where necessary. Specific sites are identified in the Site Specific Allocations Document.
- 1.52 e. Quality cycling conditions will be delivered on the local cycle route networks, via individual schemes funded through the LIP and other available sources.
- 1.53 f. Improved conditions for walking will be delivered through LIP funding and other available sources.
- 1.54 g. Sustainable development, as referred to in Policy IS1, will be supported through the management of freight, servicing and parking, and the use of Transport Assessments, travel plans and the use of the river (see also Policy PL9).
- 1.55 The view of the Council's Planning Policy Team is that in the context of policy PL3, 'safeguarded' is achieved by a Safeguarding Direction and that where the Council is aware of a Safeguarding Direction, this will be captured in the Site Specific Allocations Document (SSAD) policies for specific sites.
- 1.56 In the SSAD there are references in some site allocations to Safeguarding Directions for the Thames Tideway Tunnel Project. However, there are no references to Safeguarding Directions for Crossrail 2. There are references in some site allocations to a transport use being safeguarded and a reference to PL3 – 4.1.4 land at Clapham Junction.
- 1.57 The application site is not subject to a Safeguarding Direction and it is not subject of any SSAD policies. Other than the general policy aims in PL3(c) to promote Crossrail 2, policy PL3 does not operate to prevent permission for the application being granted.
- 1.58 Policy DMT4 of the Council's Development Management Policies Document 2016
- 1.59 Land for transport functions
- 1.60 a. Development of sites that would compromise land used or safeguarded for transport functions, will only be permitted where:
 - 1.61 i. there is no current or future strategic or operational need; or
 - 1.62 ii. alternative provision is made; and

- 1.63 iii. consultation has been undertaken with operators, owners and/or other interested parties.
- 1.64 b. New and additional land for transport functions and infrastructure will be sought to address deficiencies in provision and/or to accommodate expected future demand.
- 1.65 c. Commercial heliport facilities will be restricted to the existing heliport site at Bridges Wharf on the Battersea riverside. Further new commercial heliport sites will not be permitted.
- 1.66 DMT4 (a) refers to land used or safeguarded for transport functions. So the land has to be in use or already safeguarded in order for the restrictions of that policy to bite. The application site is not currently used for transport functions nor is it safeguarded. The Planning Policy Team have confirmed that in order for policy DMT4 to be engaged, under paragraph (a) the land must be used or safeguarded for transport functions. Therefore the policy does not address land which may be needed in the future for transport purposes. Therefore policy DMT4 does not stand in the way of permission being granted for this application.

Will the Weir Road be required for Crossrail 2?

- 1.67 If the term 'safeguarded' is meant to bear its usual meaning of 'protected' rather than a formal Safeguarding Direction, as asserted by TfL, then policy 6.2 of the current London Plan suggests permission should be refused for development proposals that do not provide adequate safeguarding for stated transport schemes.
- 1.68 The application site comprises 0.585ha which equates to less than 2% of the overall area of the Weir Road site. Officers are of the view that granting planning permission for the application would not fail to provide adequate safeguarding for Crossrail 2 under policy 6.2, if the plans for the Weir Road site were to be implemented.
- 1.69 With regard to TfL's comment that the proposed uses at the Weir Road site would be incompatible with the residential use proposed in the application, the applicant has advised that the development has been designed so that any impacts of Crossrail 2 can be managed and mitigated. Examples of this adequate insulation measures which is recommended to be secured by planning application. Other examples include the design of the building which limits the amount of overlooking to the south with windows facing north.
- 1.70 Officers are satisfied that concerns regarding noise and light nuisance can be adequately mitigated through conditions on this application and on any grant of permission for the wider Weir Road site.
- 1.71 It is also, arguably, of relevance to the question of whether the application proposal adequately safeguards Crossrail 2, to consider the likelihood of the Weir Road site actually being required. It has been earmarked as a preferred site for at least four years and in this time TfL has not made it subject to a Safeguarding Direction.
- 1.72 In February 2018, a TfL Programmes and Investment Committee paper acknowledged that there was a risk emerging related to land and property costs because the existing Safeguarding Directions do not reflect the strategic outline

business case route alignment. It had previously been intended that a revision to the directions would be made following a route-wide consultation in early 2018. However, that consultation has been postponed pending the outcome of the funding, financing and affordability work. There have been no further Safeguarding Directions since March 2015.

- 1.73 The first Safeguarding Direction for Crossrail 2 was made in 1988. Plans for Crossrail 2 are not anticipated to be submitted to Parliament until 2021/2022 and it is anticipated that Crossrail 2 will be up and running by the early 2030s. In that context, arguably, four years is not an unreasonably long time period but against this the Council has to determine the application and it is a matter of judgement as to how long land should be 'protected' from development if there has been no formal Safeguarding Direction.
- 1.74 In addition, both the response to the Autumn Consultation (July 2016) and the 'Shafts and Portals' section of the website state that various alternative sites are being considered. Crossrail 2 have advised Officers that the Weir Road site is included in Transport for London's submission to the Secretary of State as a preferred stabling depot and ventilation shaft. However, this is subject to confirmation from the Secretary of State, and this proposed designation may therefore be subject to further change.

Summary on safeguarding issue

- 1.75 The application site is not subject to a Safeguarding Direction.
- 1.76 TfL has identified the Weir Road site, which includes the application site, as being required for a depot to stable and maintain trains and for a ventilation shaft.
- 1.77 Further consultation on revisions to the 2015 Safeguarding Direction have been postponed pending the outcome of the funding, financing and affordability work.
- 1.78 It is not formal TfL's position that the Weir Road site is the only option for the proposed depot and operations. Along with the entirety of Crossrail 2, The proposed use of the site for a shaft and stabling is under review by the Secretary of State.
- 1.79 London Plan 6.2 says that development proposals that do not provide adequate safeguarding for Crossrail 2 should be refused – officers consider that the application does not fail to provide adequate safeguarding because of the very limited area of the application site within the wider Weir Road site and the mitigation measures proposed.
- 1.80 In Core Strategy policy PL3, 'safeguarded' is achieved by a Safeguarding Direction and that where the Council is aware of a Safeguarding Direction, this will be captured in the Site Specific Allocations Document (SSAD). Other than a general policy to promote Crossrail 2, policy PL3 does not operate to prevent the grant of planning permission for this application.
- 1.81 In order for the restraint element of policy DMTS4 to be engaged then land has to be in use or already safeguarded. Neither is the case in this application.

- 1.82 Emerging London Plan policy T3 requires priority to be given to Crossrail 2. It is not development plan policy. It is a material consideration which carries moderate weight in view of paragraph 55 of the NPPF.

Conclusion on Safeguarding

- 1.83 Through the above analysis of the relevant development plan policies, officers are of the view that these policies do not direct that the application should be refused. Even if it is considered that the grant of permission would be against the general policies of promoting Crossrail 2, in considering the planning balance, the development plan is to be read as a whole. Against the general policies there are policies in the development plan which support the application. This report explains these policies, the relevant material considerations and the weight to be given to them and concludes with whether officers recommend planning permission should be granted or refused.
- 1.84 The next section of this report considers the principle of the large-scale shared accommodation block.

Principle of Shared Accommodation

- 1.85 Policies DMH9 of the Councils adapted DMPD and draft London Plan policy H18 are relevant for establishing the acceptability of the principle of the proposed shared accommodation use. DMH9 states that the provision of new shared-accommodation buildings will be supported subject to six criteria. These criteria are now considered as follows:

i. There would not be an over-concentration of similar uses detrimental to residential character or amenity

- 1.86 There are no large-scale shared-accommodation/ co-living blocks within the existing neighbourhood or indeed elsewhere in the borough. The Councils Home in Multiple Occupation (HMO) Register also identifies that there are no licensed HMOs within the surrounding area. It can therefore be concluded that the proposal would not result in an over-concentration of similar use detrimental to amenity.
- 1.87 The applicant has submitted a management plan for the building with the planning application. The plan for example identifies that how the building will be staffed including procedures for dealing with any anti-social behaviour. A full consideration the submitted management plan and amenity impacts are considered in greater detail later in this report.

ii. The proposal caters for need identified in the Wandsworth Strategic Housing Market Assessment (SHMA)

- 1.88 The Councils latest SHMA finds that renting one bed units is unaffordable for residents with the median salary and it therefore identifies that there is a need for shared housing within the borough. The SHMA specifically recommends that a more diverse housing offer is required, and this includes encouraging smaller homes. It can therefore be concluded that the proposal caters for an identified need for shared housing/ smaller homes as concluded by the SHMA.

- 1.89 In coming to this conclusion it should be noted that the SHMA does not specifically conclude or provide an assessment of the need for large-scale purpose-built shared accommodation. The proposal does nevertheless provide shared housing in accordance with identified need.

ii. The quality of accommodation meets at least the minimum relevant standards for that use

- 1.90 The draft London Plan states that there are no internal space standards for large-scale shared accommodation blocks. However, it does recommend that rooms should be appropriately sized to be comfortable and functional for tenant needs and include facilities such as en-suites bathrooms and limited cooking facilities. As is concluded under the Standard of Accommodation section of this report, the proposal is considered to be acceptable in this regard.

iv. The accommodation is fully integrated into the residential surroundings

- 1.91 The existing site is not accessible at all to the wider community, and pedestrian access is very limited due to there being no continuous footpath from Trewint Street to the east. However, the proposals include a pedestrian bridge that would facilitate safe access to the site, and the proposed river walk would be accessible to all members of the public.
- 1.92 The proposed café/ restaurant would be accessible to the wider public, and 311 square metres of other space on the ground floor would be accessible to the wider community for events and co-working. Details of a Community Investment Programme (CIP) has also been submitted with the planning application. The programme states that events are proposed to take place within the ground floor co-working/ community area, including book clubs, free coffee mornings, rehearsal space for local arts and drama clubs and monthly cooking classes.
- 1.93 The Section 106 legal agreement would include the requirement for the Applicant to submit a CIP and to consult with the local community regarding its provisions prior to the submission of a final version.
- 1.94 It can therefore be concluded that the proposal would integrate with the local residential surroundings. Matters regarding physical integration and mixed communities are considered later in this report.
- 1.95 The proposal is now considered in accordance with draft London Plan policy H18. The draft London Plan identifies that large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. This policy is required to ensure that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings.
- 1.96 Draft policy H18 states that large-scale shared accommodation must comply with the following criteria:

1A. It contributes towards mixed and inclusive neighbourhoods

- 1.97 As identified in paragraph 1.4, there are no properties within the surrounding area which are subject of HMO licences. This suggests that the surrounding area is characterised primarily by single-family-dwellings and flats. The provision of 292 co-living units, which would accommodate primarily single occupants, would make a significant contribution towards creating mixed neighbourhoods in accordance with this provision.
- 1.98 Furthermore, the nature of the above outlined community facilities and the creation of the river walk for public access would also contribute to inclusiveness. The proposal is therefore acceptable in this regard.

2. It is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency

- 1.99 The site has a high public transport accessibility rating (PTAL) of 5. The site is located 400m to the southwest of Earlsfield Station where trains operate to London Waterloo, Clapham Junction, Wimbledon, Dorking, Guildford, Hampton Court, Effingham Junction and Shepperton. Garratt Lane is sited 200m to the west and is served by multiple bus routes including bus routes 44, N44, 77 and 270. In addition to this, the site is also near to London Cycle route 20 which connects to Superhighway 8.
- 1.100 In considering the highly accessible nature of the site, the proposal is acceptable in this regard.

3. It is under single management

- 1.101 The submitted Management Plan identifies that the site would be run and managed by a single operator, The Collective. The proposal is therefore acceptable in this regard.

4. Its units are all for rent with minimum tenancy lengths of no less than three months

- 1.102 The Section 106 agreement will secure the requirement for tenancies to be offered at a minimum of 6 months and up to 3 years. Given this exceeds the minimum length required by this policy, the proposal is acceptable in this regard.

5. communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include facilities such as convenient communal kitchens, outdoor and internal amenity space, dry-cleaning facilities, concierge and bedding/ linen changing facilities.

- 1.103 In addition to the small kitchenettes within the co-living rooms, occupants would have access to single 176 square metre kitchen on the first floor of Block B1. The kitchen would have 15 cooking stations, which would equate to 19 co-living rooms per station. Seating for a minimum of 50 people would be provided both internally within the kitchen and on the external roof terrace above the Link Building.

- 1.104 Officers queried whether the provision of one large kitchen on the first floor is convenient for occupants. Officers also noted that on a site visit to The Collective's site in Old Oak Common, several much smaller kitchens are provided. In response to this concern, the Applicant has confirmed responses regarding kitchen provision from occupants of the Old Oak scheme informed this decision. One kitchen is justified to foster a greater degree of mixing between residents, when compared to smaller kitchens located throughout the building which can be more isolating for residents. The provision of one large kitchen is therefore on balance considered to be acceptable in this instance.
- 1.105 In addition to the kitchen provision, residents would have access to the two roof terraces, an enclosed rear garden, the proposed river walk and numerous internal amenity areas including a screen room, gallery, sitting room and fitness rooms. Furthermore, Garratt Park is located a short distance away to the south. The building would also include concierge and bed linen changing included in the rent.
- 1.106 In considering the above, the proposal is acceptable in this regard.

6. The private units provide adequate functional living space and layout, and are demonstrably not C3 Use Class accommodation

- 1.107 The bedrooms within the development would not comply with the legal definition of a dwelling house which is defined as being capable of providing 'day-to-day domestic' existence by virtue of the lack of a fully functioning kitchen, and the dependence of residents on the shared spaces including the large shared kitchen. The proposal is therefore acceptable in this regard.

7. A management plan is provided with the application

- 1.108 In support of this requirement, the draft London Plan states that a Management Plan must include information on security and fire safety, move in and out arrangements, how internal and external areas would be maintained, how communal and private rooms will be cleaned, how linen changing services will operate and how deliveries will be managed.
- 1.109 The Management Plan submitted with the application includes information as per the above requirements, including:
- 1.110 - Confirmation that the rent includes access to all facilities and bills;
- 1.111 - There being a team of 17 staff members at the site, including managers, community leads, community maintenance, night concierge and housekeepers;
- 1.112 - Details regarding how anti-social behaviour will be dealt with, including repeat offenders having their agreement terminated;
- 1.113 - Details of 7 staff members who will maintain the shared areas;
- 1.114 - Provision of major incident plan;
- 1.115 - Exclusion of residents from CPZ permits;

- 1.116 - Moving process, including moving check-in at 3pm and moving out hours of 10am;
- 1.117 - Details of access arrangements including key cards and CCTV arrangements;
- 1.118 - Details of hiring specialist consultants for fire risk assessment, health and safety assessments and legionella's risk assessments;
- 1.119 - Details of waste disposal arrangements.
- 1.120 It should be noted that the submitted Management Plan makes a commitment of providing 3 months agreements. However, the Applicant has committed to offering the co-living rooms at a minimum of 6 months up to 3 years. An updated Management Plan can however be secured by a S106 legal agreement. Matters regarding residents' deliveries are covered in the Transport and Highways section of this report.
- 1.121 Given the above, the proposal is acceptable in this regard.

8. It delivers affordable housing

- 1.122 The proposed development supports the provision of 35% on-site discounted rented co-living rooms. The proposal is therefore acceptable in this respect. Further details of this provisions are summarised under the Affordable Housing section of this report.

Principle of the Café/ Restaurant Use

- 1.123 DMPD policy DMTS2 states that town centre uses will not be permitted outside of town centres unless the NPPF approach is satisfied. The NPPF states that proposals for town centre uses should be considered in accordance with an up-to-date local plan. DMPD paragraph 4.19 states that where a town centre use is greater than 300 square metres and it is out-of-centre, a sequential test is required. As the site is located within 170 metres of Earlsfield Local Centre, it constitutes an Edge-of-Centre location. As a consequence, there is no requirement to justify the proposed café/ restaurant with a sequential test, and the principle of this use is acceptable.

Principle Summary

- 1.124 The proposed loss of the existing industrial use and existing buildings is acceptable as there is no policy protection afforded to the site in this regard and the existing buildings/ structures do not make a positive contribution to the wider townscape.
- 1.125 The provisions of the London Plan in respect of safeguarding do not direct that the application should be refused. Even if it is considered that the grant of permission would be against the general policies of promoting Crossrail 2, in considering the planning balance, the development plan is to be read as a whole. Furthermore, the principle of large-scale shared accommodation block would be acceptable in accordance with DMPD policy DMH9 and draft London Plan Policy H18, subject to the submission of additional information as indicated. Finally, the principle of the A3 use is also acceptable given the size and siting of this unit.

2 Design, Appearance, Heritage and Townscape

- 2.1 This section considers the design of the proposed development, its visual impact upon the local area including a tall building assessment and the proposed public realm including landscaping.
- 2.2 **Design**
- 2.3 The NPPF attaches great importance to the design of the built environment and good design is a key aspect of sustainable development. New developments are encouraged to respond to local character and history and reflect the identity of local surroundings and materials. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.
- 2.4 Core Strategy policy IS3 states that the layout, form and design of new buildings and the spaces around them should contribute positively to the local environment, creating places, streets and spaces which meet the needs of people and are visually attractive. Further, policy DMS1 states that proposal should optimise the potential of sites so that the layout and arrangement of buildings ensure a high level of physical integration with the surroundings. The scale and appearance of buildings should contribute positively to local spatial character.
- 2.5 The existing site is currently occupied by buildings and shipping containers that do not in any way make a positive contribution to the existing townscape. The site has a poor relationship to its surroundings with blank external frontage, including a building arrangement that prevents public access to the River Wandle. There is therefore no objection to the loss of the existing and removal of the existing buildings
- 2.6 The neighbourhood to the east is characterised primarily by two-storey dwellings and flats, whilst the immediate area to the south is comprised of single-storey traveller dwellings, and the large-scale waste and recycling centre on Weir Road.
- 2.7 A railway embankment is located to the west, and beyond that planning permission is in place for residential buildings up to 6-storeys high 65 metres away. To the north is a railway bridge, and beyond that buildings up to 6-storeys high are under construction 100 metres away. The 5-storey Banham Building HQ is located 80 metres from the site to the north.
- 2.8 The surrounding area can therefore be characterised as somewhat varied in terms of building heights.
- 2.9 Although the proposed buildings are considerably higher than the prevailing building heights of the two storey dwellings in Earlsfield and the dwellings at the Traveller site, the varied design of the proposed buildings, the separation from the main residential neighbourhood to the east and the arrangement of the buildings would on balance mitigate against any adverse townscape impacts. A further consideration of townscape impacts is provided under the Tall Building Assessment heading of this report.

- 2.10 The overall scale and massing of the proposed buildings would be softened by the varied roof forms which references the historic industrial nature of the site and indeed the Wandle Valley. This mass and height would also be compensated by a range of building heights and brick tones including Block A1 being 6 storeys including roof accommodation; Block A2 being 5-storeys plus; Block B1 being 8-storeys and Block B2 being 6-storeys. To ensure the range of red bricks are suitably varied, and all other materials relate well to one another, it is recommended that samples of the materials be secured by prior-commencement condition.
- 2.11 Further architectural details that provide for a high-quality environment include the use of grey coloured Crittall-style windows, the window reveals being chamfered and the provision of brick soldier courses on Blocks B1 and B2. Moreover, whilst the blocks are varied in terms of form and materiality, there is a degree of coherence provided by consistent ground floor treatment and reference to the historic industrial nature of the site.
- 2.12 In addition to the above, the scale of the proposed blocks must be read alongside the immediate emerging River Wandle context of buildings up to 6-storeys high. Blocks A1, A2 and B2 would be similar in size to those blocks. Whilst Block B1 would be two-storeys higher than these buildings, its additional height assists in creating visual interest by puncturing above these emerging building heights.
- 2.13 The majority of roof top plant equipment would be provided on the roof of Block B2 and be obscured from view by the proposed saw-tooth roof. Notwithstanding this, it is recommended that these details be secured by prior-commencement conditions.
- 2.14 From a designing-out-crime perspective, the proposal would significantly enhance the locality in this respect by increasing activity around the eastern side of the Trewint Street vehicular bridge. Having active frontages fronting the river would also provide 'eyes-on-the-group' within the development itself. The submitted Management Plan also confirms that fobs will be required to access all parts of the development except the café/ restaurant. Moreover, the submission of a lighting scheme, which is proposed to be secured by planning condition, would enable the Metropolitan Police Service to have further input in this respect. It is noted that concerns have been raised that the development may increase antisocial behaviour. Whilst there is no evidence this will be the case, a robust Management Plan which will be secured by the Section 106 legal agreement will be expected to include robust mitigation measures in this regard.
- 2.15 The visual impact of the development upon the wider locality has been demonstrated with the submission of a Heritage, Townscape and Visual Impact Assessment. To avoid duplication, the Assessment is considered in greater detail under the Tall Buildings Assessment section of this report. Moreover, subject to the submission of further details, the proposal is acceptable from a designing out crime perspective.
- 2.16 Subject to satisfactory public realm, landscaping and a tall building assessment, the proposal is acceptable from a design and appearance perspective for the reasons as summarised above, in accordance with the NPPF, Core Strategy policy IS3 and DMPD policy DMS1.

2.17 **Tall Building Assessment**

2.18 As the proposed buildings exceed 5-storeys, a tall building assessment is required. Tall buildings are defined in the Core Strategy as those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline. In order to demonstrate compliance with Core Strategy Policies IS3(d) and IS3(e) the building on this site requires assessment against the criteria in Tall buildings Policy DMS4(b). It is pertinent to note that the tall buildings policy does not preclude any tall building outside of Town Centres. Rather, developments must be justified in accordance with DMS4. The assessment is set out below:

i) Contribution to social inclusion, environmental health and economic vitality of Wandsworth:

2.19 The proposed development would regenerate the existing site whilst providing affordable co-living rooms, a publicly accessible bridge and river walk, and community related floorspace within the ground floor of the development. The proposal would add to the economic viability of the borough by providing short term employment benefits associated with the construction phase of development, and employment generated by the management of the buildings and restaurant/ café. The proposal is therefore acceptable in this regard.

ii) Transport assessment and travel plan demonstrating innovative and sustainable approaches to transport issues including reduction in private vehicle usage and improved access to public transport:

2.20 Occupants of the development would benefit from access to a range of sustainable transport modes by reason of the sites high PTAL rating. A Transport Assessment and draft Travel Plan have been submitted with the application. The draft Travel Plan includes measures to encourage walking, cycling, the use public transport and car clubs. Transport Officers note that objectives to reduce single occupancy journeys are not included, however a final Travel Plan to secure this can be secured by the section 106 legal agreement. Subject to the submission of a final Travel Plan, the proposal is acceptable in this regard.

iii) Micro-climate effects:

2.21 A Pedestrian Level Wind Desk-based Assessment and Daylight Sunlight Assessment has been submitted with the planning application.

2.22 Using well established criteria to assess likely wind conditions around the development, the assessment concludes that all entrances of the proposed development are expected to have conditions ranging from acceptable for sitting and standing. These areas therefore suitable for the intended use. The majority of other ground levels areas are expected to have conditions suitable for amenity use. The assessment does however conclude that winder conditions are predicted for the open space to the immediate north and south of Block A. Mitigation measures including natural foliage in these locations is therefore recommended. Should planning

permission be granted, it is recommended that these details be secured by prior-occupation condition.

- 2.23 The terrace above the Podium-Block was also assessed and it was concluded that there would be no unacceptable impacts here, although a balustrade to a height of 1.5 metres is nevertheless recommended to secure the calmest possible conditions. The same is recommended for the roof terrace above Block A2.
- 2.24 The Daylight and Sunlight Assessment also concludes there would be no undue impact upon neighbouring amenity. To avoid duplication, this assessment is considered in greater detail under the Impact upon Neighbouring Amenity heading of this report.
- 2.25 In considering the above, the proposed development is acceptable in this regard subject to the submission of wind mitigation measures as indicated.

Criterion iv & viii) Show through a detailed design analysis that the proposal would have an acceptable visual impact on surrounding areas (through computer visualisations and photo montages):

- 2.26 The Heritage, Townscape and Visual Impact Assessment has been submitted for the purposes of assessing the visual impact upon the surrounding area. In doing this, Officers identified eleven sites from where townscape impacts should be assessed. An additional location was selected by the Council. 3D models of the site were then applied to images. These twelve sites can be assessed as follows:
- 2.27 Earlsfield Train Station platform (320m to the north-east): the assessment finds that the proposed development would be visible beyond roofs of properties on Garratt Lane. However only occasional glimpses would be observed due to the siting of mature trees when viewed from this direction. Where visible, the scale would be commensurate with buildings in the foreground. The impact from this location would therefore be very minimal;
- 2.28 Summerly Street (220m to the east): the proposed development would form the backdrop to the existing two-storey properties on the western side of the street. From this location the upper floors of blocks A1 and A2 would be visible. The top of the parapet of Block B would however just be visible. Blocks A1 and A2 would undoubtedly change the skyline when viewed from this direction. However, on balance, this is considered to be acceptable as the degree of change wouldn't be significant, and the development would act as a way finder in terms of locating the River Wandle when approached from Garratt Lane. This view also confirms that views of the development would be restricted to streets that are perpendicular to the application site. The townscape impacts are therefore on balance considered to be acceptable from this perspective;
- 2.29 Skelbrook Street (150m to the east): as with Summerly Street, the Blocks A1 and A2 would form the backdrop of existing dwellings on western side of Summerley Street. However, from this location it would be more visually dominant. The top of the parapet above Block B1 would also be visible from this perspective. The sloped roof of Block A1 would be more visible from this location, however the roof assists in creating visual interest. Furthermore, the detailing of Blocks A1 and A2 would be

more notable from here. Given these characteristics, the townscape impact of the proposal is on balance considered to be acceptable from this perspective;

- 2.30 Gates outside Grade II listed St Andrews Court (250m to the east): the 3D model confirms that the proposed buildings would be entirely obscured from this location. The proposal is therefore acceptable from a townscape and heritage aspect when viewed from this location;
- 2.31 Fieldview, Magdalen Road Conservation Area (870m east): from this location, the top of the proposal would be visible in the distance. However, as the application site sits on lower land, and the separation distance from this location, the townscape and heritage impacts would not be significant;
- 2.32 Garratt Park (370m to the south west): the development would be partially visible during the winter months; however, it would be almost entirely obscured during summer when trees in the park are fully leafed. The townscape impact would therefore be negligible from this location;
- 2.33 Penwith Road River Wandle Bridge (520 north-west): from this location the development, in particular Block B1 would be visible. However, the size of the development would not be at odds with the existing Banham HQ buildings in the foreground. When the 6-storey approved development located in the Haslemere Estate is factored into the view, the proposed development would blend into the background to a greater extent. Whilst the development would be visible from this location, its townscape impacts would not be significant when considering the above;
- 2.34 Dawlish Road (160m north west): views of the development would be presented by existing gaps between buildings. However, given the separation distance, the proposal would not dominate the streetscene. The Haslemere Estate development would entirely obscure views of the development. The proposal is therefore acceptable when viewed from this perspective;
- 2.35 Dunsford Road Recreational Park (370m west): the proposed development would form the backdrop to this open space and change the skyline. The variety in block heights and the roof form would however soften the visual impact of the development. The proposal is therefore acceptable from this perspective;
- 2.36 Weir Road Industrial Estate (140m south): the proposed developments would be highly visible from this location. However, given the poor-quality industrial appearance of the estate, the proposal would improve the townscape. The proposal is therefore acceptable from this location;
- 2.37 Ravensbury Terrace (240m north): the development would be clearly visible from this location behind the railway bridge. However, when considering the Banham HQ building and the 6-storey residential building further to the north, the proposal would not appear out of context. Furthermore, when factoring in the Haslemere Estate development, views of the development would be entirely obscured. The proposal is therefore acceptable from this perspective;
- 2.38 Garratt Park Allotments (135m south): the changes to the townscape from this perspective would be significant during the winter months when there are no leaves

on the trees, whilst only glimpses of the development would be provided during winter months. The form of the development and finer details would however compensate for the visual change during the winter months. The impact of the development from this perspective is on balance considered to be acceptable.

Criterion v) assess the impact on the existing historic environment through a conservation impact assessment identifying how the surrounding area's character or appearance or the setting of a listed building would be preserved or enhanced:

- 2.39 The Heritage, Townscape and Visual Impact Assessment identifies that there are eight heritage assets within 500m of the site, including Magdalen Park Conservation Area, St Andrews Church and the Leather Bottle Public House which are both on Garratt Lane. There are five other locally listed buildings within this radius.
- 2.40 Given no physical works are proposed to those heritage assets, the impact on the setting of the assets is the key consideration in this respect. The NPPF defines setting as the "surroundings in which a heritage asset is experienced". In this instance, the size of the proposed building and the separation distance of the site from the assets, as well as built-up nature of the locality would preclude any unacceptable harm to the setting of the assets. The proposal is therefore acceptance in this regard.

vi) describe how the proposed land use mix supports and complements the surrounding land use pattern:

- 2.41 Whilst the co-living concept introduces a new form of housing to the locality, it nevertheless constitutes housing, which is the predominant use of the neighbourhood. Furthermore, the size of the proposed retail/ restaurant would be satisfactory for the location. The proposal is therefore acceptable in this regard.

vii) describe how the massing and scale of the proposal creates a form that is well integrated into surrounding development:

- 2.42 As identified above, it is acknowledged that the scale of the development is considerably bigger than existing buildings to the south and east. However greater design details including materiality and form soften this overall bulk. Moreover, the size of the buildings is not too dissimilar to new developments in the immediate area to the west and north.

ix) describe how the proposal positively contributes to streetscape, particularly including active frontages and legible entrances:

- 2.43 The proposal would significantly enhance the streetscape by providing a new pedestrian bridge across the River Wandle, a publicly accessible river walk and potentially a north river walk extension, and active frontages to front the river walk. Moreover, the bold design of the Link Building would ensure the proposed main entrance to the building is legible. The proposed streetscape would also be enhanced by the planting of trees, provision of benches and some areas of soft landscaping. The proposal is therefore acceptable in this regard.

x) describe how the proposal responds positively to any characteristic alignment and setbacks of surrounding areas:

- 2.44 The only established set back/ alignment in the locality is the existing riverwalk located to the south of the application site. Block A is set back from the River Wandle to a similar extent to provide a new river which respect the existing alignment. The proposal is therefore acceptable in this regard.

xi) and xii) describe how the proposal has been designed to create high quality public spaces and will encourage public access:

- 2.45 As identified above, the proposal includes the provision of a new river walk and pedestrian bridge across the River Wandle. Both of these elements would be accessible to members of the public, and the river walk would be furnished with benches, trees and some soft landscaping. Further details of all these elements is recommended to be secured by prior-commencement condition. Subject to the submission of additional details, the proposal is acceptable in this regard.

xiii and xiv) describe long term maintenance commitments in a maintenance programme including details for the long-term management and maintenance of the development (including public spaces):

- 2.46 As identified above, Management Plan has been submitted with the planning application. This management plan includes details of site maintenance, although an updated version should be secured by a S106 legal agreement. Subject to a submission of an updated plan, the proposal would be acceptable in this regard.

xv) Demonstrate financial and technical credibility of design:

- 2.47 A planning consultant team has been enlisted to advise on the scheme and various specialists have developed detailed assessments included within the application to support the proposal. Given the size of the proposed development it is considered that the construction would be conventional and therefore, there is no reason to believe that the proposals would not be technically credible

River Walk, Public Realm and Landscaping

- 2.48 The key public realm and landscaping aspects to consider relate to the three private amenity spaces, the river walk, front courtyard, island and pedestrian bridge. Overall, the proposed landscaping is considered to significantly enhance the appearance of the site and the setting of the proposed buildings. Detailed designs of all these aspects is recommended to be secured by planning conditions should planning permission be granted.
- 2.49 All three private amenity spaces would include a mixture of hard and soft landscaping, intimate and more private seating. The private courtyard to the rear specifically would include shade-tolerant trees and shrubs, communal and private seating. The roof terrace above the Podium-Block specifically would include an area for outdoor eating given its proximity to the proposed kitchen, with box planting sited around its perimeter to prevent direct overlooking towards the traveller site to the south. Further, the terrace above Block A2 would include a large area of soft landscaping, including

seating within well defined areas. The nature of the proposed amenity spaces, including large areas of soft landscaping and seating would ensure that occupants of the development have a varied choice of outdoor amenity space, that would enhance the overall development.

- 2.50 The proposed riverwalk, which would include a mixture of hard and soft landscaping, as well as the planting of several trees, would provide a high-quality environment that would encourage both occupants of the development and the wider public to dwell. Moreover, the proposed riparian planting along the river bank would further enhance this positive urban realm experience.
- 2.51 The proposal would also include the provision of safeguarded land, so the river walk could continue north of the application site towards Ravensbury Terrace within the London Borough of Merton. A financial obligation of £150,000 has also been secured to pay for the delivery of Option 1 to utilise the existing river bank. Network Rail have also accepted the principle of Option 1, which represents the overcoming of a significant hurdle in terms of delivering this extension to the Wandle Trail. The delivery of this extension would be of significant benefit to the proposed development itself and the wider locality.
- 2.52 The use of stone sets for the proposed front courtyard would provide a high quality yet practical area, that would correspond well with the historic use of the application site. Moreover, the use of some areas of soft landscaping including the planting of trees would soften the appearance of this area, without impeding servicing access to the application site.
- 2.53 Further to the above, the light-touch approach to the existing island, in respect of keeping these areas fenced-off to the public and planting numerous shrubs, is supported by Officers. Additionally, the proposed pedestrian bridge creates a significantly enhance sense of arrival to the site. The siting of the bridge would also correspond with the entrance path that leads to the main entrance of the development, thus provide good legibility.

Design, Tall Buildings and Landscaping Summary

- 2.54 The above detailed analysis above indicates that the application complies with the criteria within the Tall Building assessment as set out in DMS4. The proposal would also comply with policies DMS4, DMS1, DMS2 and DMO6 of the DMPD and policy IS3 of the Core Strategy, in respect of its design, landscaping, townscape impacts and the provision of a river walk.

3 Affordable Housing

- 3.1 Draft London Plan Policy H18 recognises that large scale co-living developments may provide a housing option for single person households who cannot or choose not to live in self-contained or houses of multiple occupation and sets standards any such large-scale development should achieve. Currently, there are no similar purpose built co-living schemes in the borough.
- 3.2 The Collective, who will own and manage the proposed development, have a track record of such schemes with 7 now operative, including a large scheme at Old Oak Common providing 546 co-living homes. The co-living product provides small units

with a kitchenette, bathroom, and bedroom as an alternative to traditional house sharing accommodation and incorporates defined spaces for the residents to socialise and access a range of facilities.

- 3.3 The applicant proposes 292 co-living units of mainly 16.8 sqm across two buildings of up to 8 storeys with dual lifts in each building, linked by a communal reception entrance area. The ground and mezzanine floors will be mainly for defined amenity space for the residents, including a communal master kitchen, gym, bar, cinema, library, communal lounge, wellbeing studio, laundry and landscaped terrace. In addition there will be a publicly accessible café.
- 3.4 The discounted units will be rented at an initial rent and charge of £ 260 pw, which will be inclusive of all service charges including utility bills, council tax, linen changing and broadband costs, and will have free access to the above mentioned facilities.
- 3.5 As part of their submission, the applicants submitted a financial viability appraisal which has been assessed by the Council's consultants BNP Paribas. BNP Paribas have concluded the scheme generates a surplus of approximately £ 1.3m based on the applicants proposed rent levels, which the Council could elect to receive as a commuted sum. It has been calculated this sum would be sufficient to acquire 2 -3 houses in the area for affordable housing or be used to support the cost of delivering 4 to 5 affordable homes as part of the Council's own development programme.
- 3.6 The applicants have also offered, instead of a commuted sum, 35% (102 rooms) of the co-living units at a discount to the stated rent of £ 260 pw to increase the level of affordability in the scheme. BNP Paribas have considered this offer and have proposed a higher level of affordability could be achieved. The applicants have subsequently offered an enhanced affordability for the units. These offers are detailed in the table below.

Option Assuming 292 units	Collective Current Offer (Discount to OMR)	BNPP position (Discount to OMR)	Collective Enhanced Offer (Discount to OMR)
35% affordable housing 102 units	89 @10% discount 13 @ 20% discount	68 @10% discount 34 @ 20% discount	42 @10% discount 30 @ 20% discount 30 @ 30% discount
25% affordable housing 73 units	43 @10% discount 17 @ 20% discount 13 @ 30% discount	35 @10% discount 18 @ 20% discount 20 @ 30% discount	
20% affordable housing 58 units	16 @10% discount 20 @ 20% discount 17 @ 30% discount	12 @10% discount 22 @ 20% discount 24 @ 30% discount	

- 3.7 The ADHS&D has also discussed the scheme with the Assistant Director of Children Services as to whether any of the flats would be of interest to care leavers requiring move on/alternative accommodation. Children Services have responded to state that these properties would be of interest, particularly to children awaiting a permanent offer of housing. Given the units would not be ready for occupation for several years

they are unable to make a definite commitment to taking these units but have requested that an option is secured on five units for Children Services nominations at this stage.

- 3.8 The ADHS&D has considered both the commuted sum and on-site affordability offers. The draft London Plan recommends that Local Authorities take a commuted sum on such schemes as such units cannot be considered as affordable housing due to the space standards. The ADHS&D considers that the benefit to the Council described above in helping to meet local housing needs particularly from those lower to middle income residents and workers requiring rented accommodation, on balance outweighs the commuted sum that is calculated could be offered. Key is the significant number of units that could be delivered on site at lower rent and service charges levels in perpetuity through the enhanced offer from the applicants and the willingness of the applicants to agree a lettings and marketing plan with the Council for these affordable units. BNP Paribas have appraised the enhanced offer from the applicants and conclude that the scheme would now be in a deficit of £ 896,000 at these reduced rent and service charge levels.
- 3.9 The draft London Plan recommends that where developments make a contribution equal to 50% of the units proposed at a discount of market rent, they will not be subject to a late review mechanism. As can be seen from the table above, affordability at 35% affordable housing is significantly increased by the Collective's enhanced offer. As this enhanced offer places, the scheme in deficit and is provided at the applicants risk the ADHS&D is minded not to seek a late review mechanism in this instance for the reasons stated below.
- 3.10 It is the ADHS&D's view that capturing the increased affordability at this stage provides greater certainty in maximising the affordable housing offered, than taking a risk that the scheme may or may not deliver a commuted sum of greater than the value of the enhanced affordability being offered (equivalent to £ 896,000).
- 3.11 The ADHS&D has consulted BNP Paribas regarding this matter and whilst BNP Paribas cannot state what the position would be in say three years time, on current forecasts of anticipated costs and rental yields, the commuted sum payable if a late stage review mechanism was required, would at best be at or around the £ 896,000 sum already secured by the enhanced offer.
- 3.12 In this particular instance, the ADHS&D's recommendation is that the enhanced affordability offer from the Collective is secured in this application in lieu of late stage review, rather than risk whether market movements in costs and revenues would lead to a better or worse position for the Council in future years. It is also positive that the Collective have agreed to not apply a Consumer Price Index (CPI) plus 1% rent and service charge increase so that first lettings of the affordable housing to which this formula applies will be at the rent level and discounts set out here.
- 3.13 The applicants have submitted a management plan with their application detailing the staff that will be on site and the terms and conditions of occupation. The properties will be let on renewable licences (unless there is a breach of terms and conditions), of 3 to 12 months. The ADHS&D and Council policy would always seek more secure and longer tenancy terms, however the nature of this accommodation and the services provided mean it has not been possible in this instance to require more

secure tenancy terms. However, discussions with the Applicant have sought to ensure that this scheme does not become one which by default becomes known as a transient and more temporary form of accommodation. As a minimum, therefore he would seek in the discounted market units a licence of a minimum 6 months. The plan also details the staff that will be on site all day and out of hours (there will be a night time concierge) and he would expect the management plan to outline the approaches taken to instil a sense of home, place and community which would encourage longer periods of occupation.

3.14 Should planning permission be granted, the ADHS&D would require the following to be secured in the S 106 Legal Agreement:

- The affordability of the discounted units to be secured in perpetuity assuming an initial rent/charge of £ 260 pw, assuming £ 180 pw rent and £ 80pw service charges (inclusive of all services);
- The applicants submit a marketing plan for the Council's approval for both the discounted and market homes at least 9 months prior to practical completion;
- That the marketing plan for the discounted market units gives the Council 3 months exclusive nomination rights for households living and/or working in Wandsworth before the units are widely marketed. A particular objective will be to target units to key workers. That the Council are given exclusive nomination rights to relets for a two week period;
- That the marketing plan for the market units, ensures that the units on initial and relet are publicised and promoted locally and that prioritisation is given to any applicants living and/or working in Wandsworth and that there will be only one annual rent increase;
- That any rent/charge increases (inclusive of all services charges) for the discounted market units after completion and first letting are only annual and limited to no more than CPI +1% and that licences are for a minimum of 6 months;
- That five units are offered to Children Services clients, with no service charges levied and at rents of £ 180 pw and in the event these are not taken up, they are let at the 30% discount rate to the £ 260 pw rent level initially;
- An early stage review mechanism if the scheme is not implemented within 18 months of grant of planning permission;
- A detailed management plan which would also include additional to matters set out above restrictions on student numbers allowed to occupy units in the scheme. The Council would also wish the applicant to identify the educational institution where any students occupying would be attending.

3.15 In summary, the ADHS&D notes that this application provides a housing option which has the potential to provide working residents with what should be a quality assured housing option. The Council in this instance has been able to negotiate an affordable housing offer which provides a genuinely affordable option for households, living and/or working in the Borough, which is significantly better than any offsite option that could be offered and will help meet the need and demand for intermediate low cost rent housing. The offer is particularly beneficial in that it is inclusive of service charges. Support will continue to be predicated and contingent on the scheme being demonstrated to be well managed and encouraging a sense of place, home and community through the services offered and the management plan put in place that will be agreed by the Council. The scheme is well located, within easy walking distance of Earlsfield station, 4 bus routes and access to local shops and the

ADHS&D recognises the improved pedestrian access and other environmental improvements to the area the application proposes.

- 3.16 Finally, the ADHS&D notes that any scheme of this nature offering private rent and/or licensed accommodation should be considered on a case by case basis and considered in the context of location, needs met, other schemes of a similar type in the area that it is judged would meet demand and potential impact on local neighbourhood, services and community.

4 Amenity Impacts

- 4.1 This section summarises the amenity impact of the proposed development in respect of daylight/ sunlight, outlook, privacy, and noise and disturbance in accordance with DMPD policy DMS1c.

Daylight/Sunlight

- 4.2 A daylight and sunlight assessment has been carried out in accordance with Building Research Establishment (BRE) guidelines "Site Layout Planning for Daylight & Sunlight. A Guide to Good Practice".
- 4.3 In assessing the impact upon daylight, the Vertical Sky Component (VSC) and No-Sky Line Contour (NSC) methods were used. The VSC calculates the amount of visible sky available to each window. The guidelines suggest that post-development, properties should enjoy at least 27% VSC or that VSC is reduced to no less than 0.8 times its former value. The NSC method investigates the distribution of daylight within rooms by calculating the area of 'working plane' which can receive a direct view of the sky. The working plane height is set at 850mm above floor levels.
- 4.4 In assessing impacts upon sunlight, the Annual Probable Sunlight Hours (APSH) method was used. The APSH test calculates the percentage of statistically probable hours of sunlight received by a window in summer and winter months. It is only windows which are 90-degrees due south which overlook a development that are relevant for this assessment.
- 4.5 The overshadowing impacts of the proposal upon well sunlit open spaces was also assessed using the Sunlight Amenity Test (SAT). This test looks at the proportion of an amenity area that receives at least 2 hours of sun on the 21st March in present conditions and compares this with the proportion of the area with the proposed development. BRE guidance suggests that at least 50% of the space should enjoy at least 2 hours of direct sunlight on the 21st March.
- 4.6 Average Daylight Factor (ADF) was also utilised, however as this assesses the internal amenity within a proposed development, this is considered under the standard of accommodation section of this report.
- 4.7 The impact of the proposed development upon Trewint Street Travellers Site which adjoins to the south was assessed, as well as 1 - 14B Summerly Street to the east and 46 - 49 Streetforth Road to the south-east. It should be noted that overshadowing upon the rear gardens of the properties on Streetforth Road was not assessed due to the separation distance from the application site.

- 4.8 The Assessment concludes that there would be no undue daylight impacts upon windows at the Traveller site to the south. The Assessment acknowledges that some windows would fall below the guidance for VSC, however these windows serve rooms which are also served by windows that would not be adversely affected. Regarding NSC, there would be no or little change in daylight distribution within rooms. As there are no windows orientated 90-degrees south of the development, there is no requirement to assess the sunlight impacts of the development upon the Traveller site.
- 4.9 The Assessment also concludes that there would be no unacceptable loss of daylight experienced by windows at 46 - 49 Streerforth Road, in terms of VSC and NSC. Regarding sunlight, the Assessment states that as it was unclear whether there are windows 90-degrees due south which serve habitable rooms, the ASPH was assessed as a precaution. The Assessment finds that there would be no unacceptable impact in this regard.
- 4.10 Regarding daylight, the Assessment concludes that there would be no unacceptable harm caused to 1 - 14b Summerley Street. Regarding sunlight, the Assessment concludes that all but one window, within the ground floor of 7A - 7B Summerley Street, would not experience any undue harm in this regard. However, the degree of winter daylight loss is unlikely to be noticeable, and the overall APSH would not fall below the recommended guidelines.
- 4.11 Finally, the Assessment finds that there would be no unacceptable overshadowing into the rear gardens of the identified properties.
- 4.12 In considering the above, the proposed development is acceptable from a daylight and sunlight perspective in accordance with DMPD policy DMS1c.

Outlook

- 4.13 The proposed development would undoubtedly be highly visible from residential properties at the Trewint Street Travellers Site to the south and 1 - 14B Summerly Street to the east. The outlook from these sites would therefore change as a consequence of the development.
- 4.14 The change in outlook from within dwellings at the Traveller site would however not be materially harmful in planning terms. This is due to the orientation and height of those dwellings in relation to proposed buildings, and the proposed buildings stepping away from the southern boundary with this site. Moreover, the existing southern boundary, which consists of stacked shipping containers, would continue to provide protection in this regard. The arrangement of the blocks, with a gap provided between them, would also provide relief when viewed from the Traveller site.
- 4.15 Further to the above, a separation distance of 38 metres from properties on Summerly Street to the east would preclude any unacceptable loss of outlook in that direction.
- 4.16 The degree of change to all other properties in the locality is likely to be negligible due to the separation distance from the site, and the aforementioned properties on Summerly Street largely obscuring direct views of the proposed buildings at ground and first floor levels.

- 4.17 In considering the above, the proposed development acceptable from an outlook perspective.

Privacy

- 4.18 The Mayors Housing SPG states that proposals directly focused windows should be avoided and a separation distance between habitable windows of 18 - 21 metres is useful yard stick when considered privacy impacts.
- 4.19 In this instance, there are windows in the lower south-west elevation of Block B and in the southern flank wall of Block A that would result in direct overlooking into the Traveller site to the south. The Applicant therefore proposes to install obscured glazing in these windows. Should planning permission be granted, it is recommended that the obscured windows be secured by planning condition.
- 4.20 There would be no direct overlooking associated with the other windows in the south-west elevation of Block B, as these windows do not face directly into windows within the traveller site. Furthermore, the Traveller dwellings which are up against the boundary with the application site would also be protected by the retained shipping containers.
- 4.21 There would be no loss of privacy or direct overlooking associated with other windows within Block A as no other windows face the Traveller site. It is likely that given the scale and separation distance of the application site from traveller dwellings towards the south and east of the traveller site, any overlooking into the site would be predominate of the roofs of those traveller dwellings. Moreover, the proposed roof terraces would be enclosed by treatment no lower than 1.7 metres high. This would prevent any loss of privacy associated with the roof terraces.
- 4.22 Furthermore, the separation distance from Block A from the properties located on the opposite bank of the River Wandle would far exceed the London Plan yardstick. As a consequence, there is unlikely to be any direct overlooking into those properties. Whilst there may be views into the rear most part of the rear gardens of those dwellings, this separation distance would preclude any unacceptable harm in this regard.
- 4.23 The arrangement of windows at the application site and the separation distance from all other dwellings in the locality would preclude any unacceptable harm in this regard.

Noise and Disturbance

- 4.24 The submitted Noise and Vibration Assessment concludes that the impact of traffic travelling to and from the site would not result in any perceptible change. This conclusion is derived from compared existing and expected movements. The report concludes that these impacts would be neutral.
- 4.25 It is acknowledged that the use of the proposed roof terraces could disturb existing local residents if the terraces are occupied late into the night. As a consequence, it is recommended that the use of these terraces is prohibited between the hours of 23.00 and 06.30. The same is the case for the proposed café/ restaurant and it is therefore recommended that opening hours be limited to the same hours, except on Sundays

and Bank Holidays when it is recommended that the hours be restricted to 08.00hrs to 22.30hrs.

- 4.26 Subject to the conditions identified above, the proposed would be acceptable from a noise and disturbance perspective in accordance with DMPD Policy DMS1c.

5 Standard of Accommodation

- 5.1 The supporting text for draft London Plan policy H18 acknowledges that there are currently no minimum space standards for co-living developments. However, it does state that private rooms should be appropriately sized to be comfortable and functional and may include facilities such as en-suite bathrooms and limited cooking facilities. The draft London Plan also identifies that communal amenity space is important in securing the quality of the overall accommodation is acceptable.
- 5.2 Although the national space standards do not apply in this instance, it is useful to note that the minimum space standard for a single occupancy bedroom is 7.5 square metres. The co-living rooms within the proposed development would be no smaller than 16 square metres, which is considerably larger than the usual minimum standard. This is even the case when deducting the kitchenette and en-suite space. Whilst it is noted that most of the co-living rooms would be single aspect, this would not result in a poor standard of accommodation due to the limited depth of the rooms and none of the rooms facing due north.
- 5.3 As identified earlier in this report, occupants of the development would benefit from access to a range of internal and external amenity areas. The number and variety of these spaces is considered to provide a good living environment for future residents.
- 5.4 In addition to the above, the Daylight and Sunlight Assessment submitted with the planning application considers that amount of daylight a select number of co-living rooms would benefit from using the Average Daylight Factor (ADF). The ADF test calculates the average illuminance within a room as a proportion of the illuminance available to an unobstructed point outdoors, under a sky of known luminance and luminance distribution.
- 5.5 Given the separation distance between the site and neighbouring properties, the assessment focused on the co-living rooms facing inwards. This assessment concludes that these rooms would benefit from satisfactory levels of daylight.
- 5.6 The submitted Noise and Vibration Report also considers the standard of accommodation provided. The report first identifies that noise levels at the site are dominated by train movements which adjoins to the west. The southern boundary of the application site also experiences noise disturbance from the recycling plant to the south. Overall, the site is considered to be at 'medium' noise at risk, and with suitable mitigation measures, would be suitable for residential development. Notwithstanding this, the report also concludes that site experiences significant night-time noise disturbance from railway.
- 5.7 To mitigate against external noise disturbance, the report identifies that the installation of appropriate noise insulation is suitable. To provide a good standard of accommodation within the development, guidance recommends that daytime noise should be below 35dB and night values in bedrooms should be below 30dB. The

report recommends that glazing with three Rw ratings are installed at the site; Rw 40dB windows in the eastern elevations facing the railway; Rw 35dB windows facing the Link-Block and Rw 30dB windows elsewhere. It is recommended that these details be secured by planning conditions should planning permission be granted.

- 5.8 The report also considers the impact of noise on the co-living rooms from the communal areas. The report identifies what the recommended noise levels should be for internal noise disturbance and suggests satisfactory insulation measures can be secured by planning condition. Should planning permission be granted, it is recommended that these details be secured by condition.
- 5.9 The report also recommends the installation of attenuated louvres to assist with cooling. Further, the report concludes that the external amenity spaces would be compliant with guidance, and the development is unlikely to be affected by vibration from the railway.
- 5.10 Regarding plant noise, the report identifies what the recommended noise disturbance levels are throughout the day. The report goes on to recommend that details of sufficient mitigation measures be secured by planning condition if deemed necessary. Should planning permission be granted, it is recommended that these details be secured by condition.
- 5.11 Finally, the report recommends construction associated impacts can be controlled with a sufficient Construction Management Plan (CMP). The CMP is considered in more detail under the next heading.
- 5.12 In considering the above, and subject to the submission of further details as indicated, the standard of accommodation provided in the development would be acceptable in accordance with draft London Plan policy H18 and the relevant provision of DMPD policy DMH4.

6 Highways and Transportation

- 6.1 Policy DMT1 of the DMPD is concerned with the transport impacts of development and sets out what information should accompany an application in order to assess the relevant transport implications. The DMPD advises that development would be permitted where it does not have an impact on the transport system, including public transport capacity and the highway network.
- 6.2 Policy DMT2 sets out the parking and servicing requirements of new developments. London Plan policy 6.13 relates to parking and gives maximum standards for car parking in developments, along with parking standards for disabled people and identifies an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. Policy 6.9 provides the cycle parking standards.
- 6.3 The site is located in an area with a PTAL score of 5 and is within 200m walking distance of bus stop P (Isis Street/Garratt Lane), which is accessed by bus services 77 and 270 (both six trips per hour), and Q, which are served by Nos. 44, 77, and 270, one of which offers 7.5 trips per hour and the other two six trips per hour during the daytime

- 6.4 It is also 360m walking distance from bus stops C and D (Garratt Lane/ Earlsfield Station), which are served by the bus services described above and a night-bus (service No. N44).
- 6.5 The site is also 458m walking distance from Earlsfield Railway Station which is served by South-West Trains. From this station, which is fully accessible for disabled people, residents can access 17 services per hour to London Waterloo and Clapham Junction, 15 services per hour to Wimbledon, and 5 services per hour to Guilford, as well as numerous Stations between these locations such as Surbiton, Vauxhall, and Woking from which they can also access light and heavy rail services to other parts of the United Kingdom.
- 6.6 The site with located within the Earlsfield L2 Controlled Parking Zone (CPZ), which operates between 09.30 and 16.30, Monday – Friday.
- 6.7 The transport impacts of the development are now considered as follows:

Traffic Generation

- 6.8 The proposed development has been submitted as a car-free one, apart from two disabled parking spaces within the curtilage of the site, and Transport Officers accept the applicant's conclusion that the only vehicular traffic impact on the local and strategic highway network will be from disabled motorists that park on-site and vehicles that service the development.
- 6.9 To support their statement on the impact of vehicles servicing the site the applicant has provided analysis based upon a survey of vehicular traffic conducted at another co-living site managed by the same developer at Old Oak Common on 26 November 2018. This development has 544 co-living bedsit units plus on-site amenities including co-working space, a bar/restaurant, a food retail outlet, and a fitness suite. This development is also car-free for residents.
- 6.10 The applicant has revised down the total number of trips to reflect the smaller number of co-living rooms and the fact there is no food retail outlet. These figures demonstrate that there would be up to 21 service and delivery vehicles to and from the application between the hours of 7am and 7pm.
- 6.11 It should be noted that neighbouring residents have raised concerns that this assessment does not consider delivery impacts after 7pm. As a consequence, the Applicant submitted data for the period 7am - 12am. Using comparative data with the Old Oak site, this additional data confirms that a maximum of 13 cars and motorcycles would be expected to service the application site between these hours, or between 2 - 4 vehicles per hour. It should also be noted that after 7pm, background traffic flows are lower so traffic in general is less of an issue. As a consequence, the submission of this additional data exceeds the usual.
- 6.12 Notwithstanding this, Transport Officers confirm that there is no evidence to reject the applicant's findings. These trips are considered to be negligible.

Overall Person Trip Generation

- 6.13 The applicant has submitted person trip rates that were derived from a survey conducted at the above-mentioned site at Old Oak Common on 12 September 2018 and has revised the number of person trips downwards to reflect the smaller number of dwellings on this site. Having reviewed this data, Transport Officers consider that the proposal is acceptable in this respect.

Vehicular Access to the Site

- 6.14 The existing site, which had to cater for rigid heavy goods and light goods vehicles, is served by a road bridge which is unregistered land and has a carriageway width of 2.8m at its narrowest point and 3m at its widest point and is 25m long. It is a shared space area from its eastern-most point for a distance of 7.6m in a westerly direction, and, thereafter, has a carriageway width of 3m, a service strip on its southern side of 0.5m in width, and a footway/service strip on its northern side of 1.6m in width, for a distance of 17.4m.
- 6.15 The existing vehicular access bridge has a carriageway width of 2.8m at its narrowest point, and this pinch-point is approximately 7m in length. Therefore, Officers consider this vehicular access as being able to provide safe and suitable access to the site for fire tenders.
- 6.16 The applicant has also provided a vehicle tracking drawing which shows a refuse vehicle of 9.2m long as being able to use the existing vehicular access bridge safely. However, in order to get within 15m of the communal refuse store within the site, it has to draw up in an area immediately south of the southern red-line boundary of the site and reverse into a dedicated servicing bay.
- 6.17 The Applicant has advised that they are currently in the process of claiming adverse possession of land to the south of the application site. Moreover, the site has been accessed without interruption for a period of at least 30 years. There is therefore nothing to suggest that access to the site would be impeded by this arrangement. Transport Officers accept this argument.
- 6.18 The application documents also identifies that aesthetic improvement works are proposed to the existing vehicular bridge. However, should the applicant intend to complete works on this bridge, these will need to have technical approval of Wandsworth Borough Council's Highway Engineering team prior to commencement of development. This can be secured through a planning condition.

Vehicular Parking

- 6.19 The applicant proposes that this development is car-free with the exception of two perpendicular spaces that they will provide for disabled motorists to use. As identified, the site is located in an area with a PTAL score of 5, with easy access to Earlsfield Station and a range of bus stops.
- 6.20 The guidance in Chapter 6 of the current London Plan states that residential developments located in areas with PTAL scores of 5 or 6 should aim to provide significantly less than one parking space per dwelling. Table 10.3 of the Draft London

Plan states that residential developments within areas with PTAL 5-6 could be car-free. Therefore, based on an assessment of the existing conditions, and subject to the provision of a separate pedestrian bridge on third party land, and residents being excluded from obtaining vehicular parking permits in the Earlsfield CPZ, Officers consider the development is acceptable as a car-free one.

- 6.21 It should be acknowledged that residents identify that as the CPZ only provides control until 4.30pm, occupants of the development may park in local area after that time. However, Transport Officers advise that given the high PTAL score for the site, and other sustainable modes of transport are accessible from it, it is considered that there is a low risk of car parking in the surrounding area after 4.30pm. It is not therefore considered to be necessary for a parking stress survey to be undertaken.
- 6.22 Notwithstanding the above, to ensure car parking in the surrounding area is restricted, an obligation within a Section 106 agreement is required to prevent residents from obtaining permits to park within the CPZ.
- 6.23 It also be noted that the provision of two disabled car parking spaces would not comply with the minimum standard for disabled car parking spaces of 3% of units as set out in the draft London Plan. Given the constraints of the site and the arrangement of buildings, compliance with this requirement is not considered to be practical in this instance. Given the other benefits associated with the development, noncompliance with this standard is considered to be acceptable in this instance.
- 6.24 Transport Officers also recommend that the on-site disabled parking spaces are fitted with electric vehicle charging points. This can be secured through a planning condition.
- 6.25 The applicant will also need to submit a vehicular parking management plan for the site which describes how residents, employees, and visitors will be prevented from parking within the informal shared space area to the west of the bridge and south of the main building. This must be secured through a planning condition and failure to secure it could lead to informal overspill vehicular parking within the site which could impede safe access for service vehicles and fire tenders.

Pedestrian Access to the Site

- 6.26 The applicant has submitted collision analysis with the planning application. Transport Officers are satisfied that there are no highway defects in the locality that would lead to any undue issues regarding pedestrian safety. This proposal is therefore acceptable in this respect.
- 6.27 As identified earlier in this report, the proposed pedestrian bridge would provide safe pedestrian access into the site. Further technical details of the bridge are however required. Furthermore, should the northern extension to the river walk be implemented, additional pedestrian access would be secured. These details can be secured by Section 106 legal agreement and are included in the Heads of Terms.

Cyclist Access to the Site

- 6.28 The applicant proposes that cyclists are prevented from using the above-mentioned pedestrian bridge and that signage is put in place to ensure this happens. Please note that the bridge will not be highway, so the Local Highway Authority will not be able to enforce this. The applicant wishes for cyclists to use the existing vehicular bridge instead. If the layout of this bridge remains as it currently is (see above section on vehicular access), there will be a carriageway of 2.8m – 3m wide. This is insufficient width to allow a car, an LGV, or an HGV to pass a cyclist.
- 6.29 It is expected that the vehicular access bridge will accommodate 10 additional vehicular movements during the AM weekday peak hour and 5 during the PM weekday peak hour (including service vehicle trips) and 11 cycle trips in the AM weekday peak hour and 8 additional cycle trips in the PM weekday peak hour.
- 6.30 The existing bridge currently provides cyclists with a link to the Wandle Trail which runs along the western side of the river south of the site. Therefore, it is already used by 41 cyclists in the AM weekday peak hour and 31 in the PM weekday peak hour. Given that there will be significantly more cyclists than motor-vehicles using this bridge at these times, Transport Officers recommend that the applicant must insert signage on the Wandle Trail warning cyclists of the possible presence of motorists. It is recommended that this be secured by planning condition.
- 6.31 Transport Officers also recommend that technical details of the existing bridge and how it is intended to make it safer for cyclists be secured by planning condition. Should planning permission be granted, it is recommended that these details be secured.

Cycle Parking

- 6.32 The level of cycle parking provision of up to 308 spaces within the ground floor of the development meets the minimum London Plan standards. As such, the proposal is acceptable in this regard. Notwithstanding this, full details of the bicycle racks are required. It is recommended that these details be secured by planning condition.

Impact of the Development on Public Transport

- 6.33 The submitted data confirms that the development will create an additional 107 rail trips during the AM weekday peak hour and 71 additional rail trips during the PM weekday peak hour.
- 6.34 Given the frequency of services which stop at Earlsfield and travel to and from the centre of London at these times, and that many of these trains are equipped with 10 carriages, this development will result in an additional 6 people per train at the AM weekday peak hour and 3 people per train in the PM weekday peak hour.
- 6.35 Therefore, Officers do not think this development will have a significant impact on the existing rail network. The proposal is therefore acceptable in this regard. It is noted that it has been suggested by a member of the public that monies should be secured to enhance Earlsfield Station. However, as it is concluded that there would not be an undue impact upon the capacity of the station, monies cannot be requested.

Servicing

- 6.36 Vehicle tracking drawings have been submitted with the planning application which show that a fire tender and a refuse vehicle of 9.2m in length can enter, turn in, and exit the development safely in forward gear subject to rights over land south of the red line boundary of the site being secured. As is identified under the Waste Management heading of this report, refuse will be collected by a private contractor and it will be the responsibility of the applicant to ensure a vehicle of no larger than the dimensions of the submitted plans is used. To secure this, a detailed Parking and Servicing Management Plan is recommended to be secured by a planning condition.

Construction Traffic Management Plan

- 6.37 The applicant has submitted a draft construction management plan which states that the construction period will last 110 weeks and has also included a plan of the phases and how many vehicular trips each phase will generate per working day. However, from the plan provided, it appears that some phases will be carried out concurrently.
- 6.38 Therefore, the plan needs to be rewritten to reflect this and give a true picture of the number of construction -related journeys to and from the site each day. The applicant also needs to submit a layout of the construction site and a plan showing the traffic management proposals and which parking bays might need to be suspended on Trewint Street. Wheel washing facilities also need to be provided on site. Employees on the construction site should be made to travel to and from the site by sustainable modes wherever possible as they will not be allowed to park in surrounding streets.
- 6.39 It is recommended that a detailed construction management plan be secured by the Section 106 legal agreement.

Residential Travel Plan

- 6.40 The applicant has submitted a draft travel plan. This does not include the objective to reduce the total number of single occupancy car journeys arising from the development. However, given that this development is to be car-free except for disabled motorists, this may not be required.
- 6.41 The applicant proposes to achieve a six-percentage point reduction in the in public transport use in favour of active travel modes to increase the proportion of residents travelling by bicycle by three percentage points. However, they have not suggested any physical measures to achieve this increase in cycling. They need to set out how they will make the existing vehicular bridge crossing safer for cyclists as it provides a vital link to London Cycle Route 20 and Earlsfield Town centre. It is recommended that a detailed Travel Plan be secured by the Section 106 legal agreement.

Overall Transport Summary

- 6.42 Subject to adequate mitigation measures secured via conditions and the S106, it is considered that the proposal would have an appropriate impact upon highway, parking and local infrastructure within the surrounding area.

7 Sustainability

- 7.1 It should first be noted that as the development is sui generis use class, it is deemed non-domestic for Part L Building Regulation purposes. In line with policy 5.2 of the London Plan and DMPD policy DMS3, the following targets apply:
- 7.2 - A 35% reduction in emissions on Part L 2013 achieved on site following the energy and cooling hierarchies
- 7.3 - BREEAM Outstanding
- 7.4 In accordance with the principles of London Plan Policy 5.2 the applicant has submitted an Energy Statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary, the proposed strategy comprises: exceeding the fabric requirements set out in the Building Regulations, energy efficient building services plant, low energy LED lights, air source heat pumps with gas fired back up, PV panels, co-living rooms to have mechanical ventilation, non-residential areas will have 4-pipe fan coil units. The café/restaurant will be fitted out to shell and core standard.
- 7.5 The information has been reviewed sustainability consultant. The proposed development would achieve a 36% reduction in carbon emissions in compliance with Part L. It is recommended that evidence the development achieves this Co2 saving prior the occupation of the development be secured by condition.
- 7.6 In regard to BREEAM, the café/ restaurant would be built shell and core only. The Applicant confirms that the development would achieve BREEAM Excellent, rather than Outstanding that is now required by policy DMS3. The explanation for this relates to the difficulty in reducing hot water energy consumption, given the high dependency of the development on using energy to heat water. The Councils consultant accept this argument.
- 7.7 With respect of BREEAM, it should be noted that developments achieves a high 77.5% score, with 70% being the minimum to achieve a score of Excellent, and 80% being the score to achieve Outstanding. The Councils consultant recommends that this specific BREEAM score be confirmed with interim and completion certificates. This can be secured by planning condition.
- 7.8 It should be noted that a consideration for connecting to a District Heating Network (DHN) was pursued by the Councils Consultants. However, it has been argued that as the site is bordered by a river and train track makes it is not practical to connect to a DHN. While in themselves not necessarily insurmountable obstacles for piping the land use on the other side of these obstacles being largely small-residential means a large network making it worthwhile to do so seems unlikely. On the South side there is an industrial estate, however close examination of this shows it to largely consist of warehouse/stockyards which would typically be mostly unheated so not an area likely to be suitable for a DHN.
- 7.9 The Councils Consultants therefore consider the proposal a "development in areas where an area wide heat network is not proposed and which is not within an area of decentralised energy potential" under the GLA Energy Assessment Guidance and not

in need of future proofing of DHNs. The proposal is therefore acceptable in this regard.

- 7.10 Subject to appropriate conditions as indicated above, the proposal is considered to comply with the requirements of the London Plan, IS2 of the Core Strategy and DMS 3 of the DMPD.

8 Ecology

- 8.1 A preliminary Ecological Appraisal and a Bat Survey were submitted and updated during the application process. An Ecological Management Plan was also submitted with the application.
- 8.2 The ecological reports identify that the site has potential for foraging bats, moderate potential to support roosting bats, high potential to support nesting birds and high potential to support European eel and brown trout. The report also acknowledges that the site encompasses a section of the River Wandle in Wandsworth Site of Importance for Nature Conservation (SINCs). The Lower Wandle Local Nature Reserve (LNR), the Wandle Meadow Nature Park and Lower River Wandle and the Earlsfield to Wimbledon Railsides SINCs are also immediately adjacent to the site or within approximately 100m of the site boundary.
- 8.3 The ecological reports recommend ecological enhancement of the site, including wildlife friendly landscaping, ecological enhancement of the islet, provision of an ecologically enhanced buffer strip of vegetation along the river bank, management of invasive species, and installation of green roofs.
- 8.4 The updated Bat Survey confirmed that there is a likely absence of bats at the site, and the proposal is therefore unlikely to impact on roosting bats. No bat activity of any kind was recorded. As a consequence, specific mitigation measures are not proposed. A bat friendly lighting strategy is however recommended.
- 8.5 It should be noted South East London Rivers Trust (SERT) (formally Wandle Trust) have raised concerns regarding overshadowing on to the River Wandle and impacts upon Brown Trout and lightening. Similar concerns have been raised by the Councils Ecologist. However, it should be noted that any overshadowing is likely occur towards the end of the day only given the orientation of the site. The Councils Ecologist has recommended that a full assessment regarding these impacts can be secured by planning condition. This condition can also the requirement to provide mitigation measures where necessary.
- 8.6 The Environment Agency (EA) have also recommended that the applicant should look into the naturalisation of the River Wandle. The EA has requested more detail of the proposed river bank improvement works but they do support the other proposals to increase the biodiversity value of the site. Officers are mindful that DMPD policy DMO7 states that the naturalisation of river banks will be sought where appropriate and possible. Moreover, the NPPF encourages measures for net bio-diversity gain. Given the other ecological enhancements identified, full details of options to naturalise or enhance the River Wandle can be secured by planning condition.
- 8.7 As identified above, the Councils Ecologist recommends that conditions to secure further survey work into impacts upon species and overshadowing be secured, as

well as recommending that details of a Construction Environmental Plan, biodiversity gain of all landscaping, and full details of an external lighting strategy be secured by planning conditions. Should planning permission be granted, it is recommended that these details be secured by condition as recommended.

- 8.8 Subject to the submission of further details as indicated, the proposal would be acceptable from an ecology perspective in accordance with DMPD policy DMO4.

9 Flood Risk

- 9.1 A Flood Risk Assessment has been submitted with the planning application. The assessment identifies that the developable area of land is located within flood risk zone 2/3 and a sequential test is therefore carried out. The assessment identifies that the buildings are located within flood risk zone 2 after carrying out this test.
- 9.2 The assessment also confirms that the ground floor levels will be 300mm above the modelled 1 in 100-year climate change flood level. The assessment identifies that there would be some surface water run-off into the River Wandle, but SuDs features will ensure excess water will safely be contained within the site. It is recommended that details of these SuDs measures be secured by condition. In the event that surface water drainage is exceeded, excess water would flow downwards towards the river leaving properties unaffected.
- 9.3 In considering the above, the proposal is acceptable from a flood risk perspective in accordance with DMPD policy DMS5, and subject to the submission of satisfactory SuDs measures the proposal would accord with policy DMS6 too.

10 Arboriculture

- 10.1 Policy DMO5 aims to protect trees from harm as the result of a development and states that the loss of trees with amenity value can only be removed if their removal would be in the 'interests of good arboriculture practice' or adequate replacement planting is proposed.
- 10.2 The submitted Arboriculture Impact Assessment identifies that there is a total of 22 trees which are affected by the proposal development. Most of these trees are outside the application site. The assessment confirms that one category C tree would be felled to accommodate the construction of the pedestrian bridge and pruning works would be required to other trees to facilitate the development. Arboriculture Officers do not object to these works. However, it is recommended that details of a tree method statement, tree protection measures and tree inspection arrangement be secured by planning condition.
- 10.3 As identified earlier in this report, a total of 39 new trees will be planted at the site. It is recommended that further details of these trees be secured with the landscaping details.
- 10.4 Subject to the submission of further details as indicated above, the proposal is acceptable from an arboriculture perspective in accordance with policy DMO5.

11 Air Quality

- 11.1 An Air Quality Assessment has been submitted with the planning application. The assessment acknowledges that the entire borough is declared as one Air Quality Management Area (AQMA). The assessment finds that the existing levels of No2 are at a level that does not present grounds to refuse on AQ grounds, in accordance with guidance.
- 11.2 A construction dust assessment was undertaken regarding the construction phase of development. This assessment recommends numerous mitigation measures regarding demolition, earthworks, construction and track out. The Council's Air Quality team advise that these measures are not comprehensive, and a Dust Management Plan should be secured by planning condition. Officers also recommend that monitoring measures be secured by condition, and a condition requiring compliance with the Mayor's SPG on dust and emissions in respect of machinery.
- 11.3 The assessment also finds that the expected number of vehicle movements associated with the development would not have undue air quality implications. Overall, the development is expected to be air quality neutral.
- 11.4 It should also be noted that residents of the Travellers site have raised concerns that they are currently experiencing undue impacts from pollution associated with the recycling centre which adjoins to the south. As a consequence, the Applicant is separately proposing to pay for an extension to the recycling centre which would cover an external area. However as this is not necessary to make the proposal acceptable, this cannot be secured by the S106 legal agreement.
- 11.5 In considering the above, the proposal is acceptable from an air quality perspective subject to the submission of further details as indicated above, in accordance with DMPD policy DMS1.

12 Land Contamination

- 12.1 Phase 1 Contaminated Land Desk Study and a Geo-Environmental Assessment have been submitted with the planning application. The desk study concludes that there are potential risks of PSBs due to the siting of a nearby electrical substation, asbestos in the fabric of the existing buildings and Mantle Works affect due to the works 75m to the west. The Geo-Environmental Assessment also identifies some levels of contamination at the site, including coal tar and elevated levels of lead.
- 12.2 Following specialist consultation with the Council's Environmental Service Department, it was determined that in order for the appropriate and robust mitigation measures to be put in place, there would need to be further detailed site investigations and associated risk assessment targeting the proposed uses at the site. Should planning permission be granted, it is recommended that these details be secured by planning condition.
- 12.3 Conditions to secure the above are recommended to be included in any planning approval to ensure that the land contamination issues are fully addressed in terms of human health and allows for appropriate mitigation and remediation following site investigations to be designed and incorporated in the development and verified, to

ensure the development is in line with DMS5 and DMS6 and the London Plan policy 5.2.

13 Waste Management

- 13.1 A Waste Management Plan has been submitted as part of the application. The plan identifies that space for a total of 25 x 1100 litre euro bins would be provided at the site. 19 of these bins would be stored in a large residential bin store in the ground floor of Block B, whilst two would be provided in a separate residential bin store in the ground floor of Block A and 4 of the bins would be located within a commercial bin store adjacent to the proposed café/ restaurant.
- 13.2 The Councils Waste Strategy Manager has identified that this would fall short of the requirement to provide a total of 28 bins at the site for single-occupancy households. However, the Applicant has advised that the proposed level of provision is based upon the existing arrangements of their existing site in Old Oak Common. It should be acknowledged that reference is not made to the provision of 1280 litre recycling bins that would also be required. Notwithstanding this, further details of waste storage provision can be secured by planning condition to secure a satisfactory arrangement. Should planning permission be granted, it is recommended that these details be secured.
- 13.3 The submitted details confirm that a private contractor would collect the waste with collection vehicles entering the site via the existing vehicular bridge. It is recommended that private collection be secured by planning condition. A sweep path analysis confirms that there would be sufficient space for these vehicles to enter and manoeuvre around the front yard as necessary.
- 13.4 Subject to the submission of further details as indicated above, the proposal would be acceptable from a waste management perspective in accordance with DMPD policy DMS1.

14 Arts and Culture

- 14.1 A Cultural Strategy has not been submitted as part of the application however in line Councils Planning Obligations SPD, therefore the applicant will need to provide a commuted sum rather than address the requirement to develop a Cultural Action Plan.
- 14.2 As such, the commuted sum would be captured within the S106 and would be used to invest into the cultural infrastructure for the area and this would assist in promoting the Borough as home to a thriving artistic and cultural community and would add to the vibrancy and character of an area.

15 Archaeology

- 15.1 DMPD policy DMS2 requires the submission of an Archaeological Desk Based Assessment for applications within Archaeological Priority Areas. This is supported by the London Plan and chapter 6 of the NPPF.
- 15.2 As identified under the site details heading of this report, historic records demonstrate that a 17th century gunpowder mill was situated somewhere in the locality, however it is unclear where the mill was sited. Historic records, including maps, do however

demonstrate that various mills were located at the application site from the 18th century onwards.

- 15.3 The submitted Archaeological Desk Based Assessment identifies the above history. Furthermore, it concludes that there is a high potential for post-medieval remains relating to above mill use, however the potential for sub-surface remains of pre-historic, Roman and medieval periods is low. The report goes on to conclude that the condition of sub-surface remains is currently unknown and there are no known designated heritage assets in the immediate area. However, the construction of the proposed development may result in the removal of sub-surface foundations associated with the historic mill use of the site.
- 15.4 The report recommends that further investigative works, including a trial trench, are necessary to characterise any remains. Historic England agree with these conclusions, with a pre-commencement condition considered to be suitable to secure potential sub-surface materials. Historic England recommend that this condition should secure a methodology for site investigation and a programme for a post-investigation assessment. It is recommended that planning permission be granted subject to this condition.
- 15.5 In considering the above, the proposal is acceptable from an archaeology perspective at this stage in accordance with DMPD policy DSM2.

16 Health

- 16.1 DMPD policy DMS1 requires the submission of a Health Impact Assessment (HIA) for large-scale planning application. The HIA concludes that the proposed development across a series of indicators would be acceptable from a health perspective. This was in part identifying there to be several GP surgeries within 2km of the site.
- 16.2 Notwithstanding the above, the NHS London Healthy Development Unit (HUDU) have advised the Council that whilst there is no standard travel /walking distance to a GP practice, the GP catchment distances generally used in London are 800 m (1/2 mile, 10 minute walk) in inner/central London and 1,600 m (1 mile, 20 minute walk) in outer London. Catchments are influenced by the size of GP practice and the range of services provided, but patients have a choice where they can register.
- 16.3 In this instance the Applicant assessed GP workforce capacity of practices within a 2km distance. A 2km distance is too wide and the HIA omitted some practices, including the Brocklebank Group Practice which is 1km away. It was concluded that it is likely that a significant number of occupants will register with the nearest practice – the Earlsfield Practice. Using the latest figures (December 2018) the ratio of patients per FTE GP at Earlsfield Practice (at 1:2274) exceeds the borough / CCG and NHS England benchmark of 1:1800. This would indicate that there is little or no capacity to accommodate the demand generated by the proposed development.
- 16.4 As a consequence, a commuted sum to contribute to local healthcare provision will be secured by a Section 106 legal agreement.

17 Utilities and Fire Safety

- 17.1 A Fire Strategy Design Note (FSDN) and a Utility Statement (US) have been submitted with the planning application. The FSDN outlines requirements with the Building Regulations. The London Fire Bridge have contacted the Council advising of a local of a fire hydrant. This is secured by planning condition should planning permission be granted.
- 17.2 The US considers gas, water and electricity supply, but confirms more work at a detailed design stage are required to ascertain service capabilities. Thames Water have responded with concerns regarding water capacity in the locality. As such, conditions requiring further information in this regard have been recommended.

18 Statement of Community Involvement

- 18.1 The applicant has submitted a Statement of Community Involvement which outlines the level of public engagement which has taken place in relation to the site. This summarises the engagement which has taken place prior and after submission.
- 18.2 Engagement included meetings with Councillors, the office of Dr Rosena Allin-Khan MP, the Wandle Valley Trust and Travellers Site. Engagement also included two public exhibitions where questionnaires were handed-out, a door knocking exercise and details of the proposal on a dedicated website.
- 18.3 The main issues raised as part of the public consultation was impact neighbouring amenity, height and community cohesion. However, the statement states that the degree of support for the proposal increased with the second consultation exercise.
- 18.4 Some residents argue that the applicant has undertaken poor consultation prior to and during the application process. However, this is a matter of opinion, rather than fact. Moreover, as identified above, several consultation events were carried out by the applicant prior to the submission of the planning application.

19 S.106 Planning Obligation

- 19.1 The section 106 agreement will secure the following obligations:

19.2 Affordable Housing

- Provision of 35% or 101 co-living rooms
- The affordability of the discounted units to be secured in perpetuity assuming an initial rent/charge of £ 260 pw, assuming £ 180 pw rent and £ 80pw service charges (inclusive of all services);
- The applicants submit a marketing plan for the Council's approval for both the discounted and market homes at least 9 months prior to practical completion;
- That the marketing plan for the discounted market units gives the Council 3 months exclusive nomination rights for households living and/or working in Wandsworth before the units are widely marketed. A particular objective will be to target units to key workers. That the Council are given exclusive nomination rights to relets for a two-week period;
- That the marketing plan for the market units, ensures that the units on initial and relet are publicised and promoted locally and that prioritisation is given to any applicants living and/or working in Wandsworth and that there will be only one annual rent increase;

- That any rent/charge increases (inclusive of all services charges) for the discounted market units after completion and first letting are only annual and limited to no more than CPI +1% and that licences are for a minimum of 6 months;
- That five units are offered to Children Services clients, with no service charges levied and at rents of £ 180 pw and in the event these are not taken up, they are let at the 30% discount rate to the £ 260 pw rent level initially;
- An early stage review mechanism if the scheme is not implemented within 18 months of grant of planning permission;
- A detailed management plan which would also include additional to matters set out above restrictions on student numbers allowed to occupy units in the scheme. The Council would also wish the applicant to identify the educational institution where any students occupying would be attending.

19.3 Financial Contributions:

- Healthcare Contribution of £108,300
- Employment Contribution of £125,755
- Arts Contribution of £116,000
- Wandle Trail Extension Contribution of £150,000

19.4 Other Obligations

- To secure a minimum of 10% accessible/ adaptable rooms
- Agreements being offered at 6 months and up to 3 years
- Highway works – S278 agreement
- Public Realm public access
- Riverside walks and bridge connections
- Safeguarding land for Wandle Trail Extension
- Travel Plan
- CPZ Exclusion
- Construction and Environmental Management Plan (CEMP)
- Construction Logistics Plan (CLP) and Dust control measures
- Construction Management Plan
- Community Investment Programme
- Local Employment Agreement - Provision of construction and end user apprenticeships in accordance with Planning Obligations SPD
- Use of Local Suppliers - Development to target that 20% of supplies and services to be provided from companies and organisations based in the borough
- Monitoring fee - In accordance with table 2 (S106 Monitoring and Administration charges) of the Planning Obligations SPD

20 Conclusion

- 20.1 The redevelopment of the site to provide a co-living development with ancillary residential development is in principle acceptable, as the proposal would not fail to provide adequate safeguarding due to the application site covering less than 2% of the overall Weir Road site. Even if the proposal was considered to not comply with the London Plan in this regard, the development plan should be read as a whole and

there are other areas of public benefits and policy compliance that would outweigh any policy noncompliance.

- 20.2 The proposed co-living development would also cater to an identified need in terms of providing shared-accommodation within the borough, and in accordance with the draft London Plan, provides accommodation for single person households who cannot or choose not to live in self-contained dwellings or standard HMOs. The proposal would also contribute towards creating mixed communities.
- 20.3 Occupants within the development would also benefit from access to a range of shared facilities including 2 roof terraces, a rear garden space and numerous internal facilities including a gym, a gallery, cinema and community space. The development would also be subject of a robust management plan including ensuring occupants are offered tenancies of no less than 6 months.
- 20.4 It is acknowledged that the buildings are considerably larger than the properties to the south in the Traveller Site and to the east in the established residential area of Earlsfield. However, the good design of the proposal, and the separation distance from the established residential area would ensure that there would be no undue townscape impacts. Moreover, the proposal should be considered in relation to emerging context including developments up to 6-storeys high which have been consented and are in the process of being implemented within the London Borough of Merton. The proposal would also enhance the streetscape of the immediate locality when compared to the existing very poor appearance of the site.
- 20.5 There would be no significant impacts upon the amenity of existing residential occupiers in any regard either. This is primarily due to the separation distance from the established residential area in Earlsfield. Whilst there would be a greater change in amenity experienced by the Traveller site, retaining the existing shipping container boundary, the arrangement of the proposed buildings and the spatial relation between the proposed development and traveller dwellings would preclude any significant impacts.
- 20.6 There are also several wider public benefits associated with the proposed development, including the provision of 35% discounted co-living rooms including up to 5 rooms which would be reserved for care-leavers, the provision of a publicly accessible river walk and new pedestrian bridge across the River Wandle, and the safeguarding of land and the payment of monies towards extending the Wandle Trail to the north of the application site. A Community Investment Programme which will secure wider community benefits and mixing at the site has also been secured by planning obligation. £500,055.00 in financial contributions in respect of arts, healthcare provision, a riverwalk extension and employment have also been secured as part of the development.
- 20.7 It is noted that concerns have been raised by the Environment Agency in respect of naturalisation of the River Wandle, and concerns have also been raised regarding overshadowing across the river. However, the site provides several instances of biodiversity gain, and issues such as naturalisation and overshadowing can suitably be dealt with by pre-commencement conditions.

- 20.8 The proposal is on balance acceptable from a transportation and highways perspective. Whilst concerns have been raised regarding safety on the existing bridge, measures to improve safety can be secured by planning condition, and the under provision of disabled car parking spaces cannot be accommodated at the site due to the existing site constraints. The submitted information also demonstrates that there would be no undue impacts upon the local highways or transportation infrastructure.
- 20.9 In order to minimise disruption throughout the demolition and construction of the development, there will be a requirement for the applicant to submit a Construction and Environmental Management Plan (CEMP) and this will include a Construction Logistics Plan (CLP) as well as dust control measures. The submitted details also confirm that there will be no undue air quality impacts
- 20.10 As such, it is considered that the proposal would not be in direct conflict with national and local planning policy and objectives and it is recommended planning permission is granted subject to the completion of a S106 and no adverse direction from the GLA.

RECOMMENDATION: Approve Subject to Conditions and S106 agreement CIL Liabe

(a) Approve subject to S106 and conditions set out below. Applicant to agree to pay the Council's reasonable cost involved in the preparation and completion of a legal agreement under S106 of the Town and Country planning Act 1990, in a form to be agreed by the Assistant Director (Planning and Transport) securing the heads of terms in (Section 19 above) and have delegated authority to make minor changes to conditions:

1. AC01 3 Years

The development hereby permitted shall be begun within 3 years from the date of this permission.

Reason: To prevent the accumulation of unimplemented planning permissions and to comply with Section 91 of the Town and Country Planning Act 1990 (as amended) and to meet the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004 and to meet the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

2. AC02 In accordance with drawings

The development shall be carried out in accordance with the reports, specifications and drawings detailed A3205 200-01R16; A3205 200-02 R15; A3205 201 R16; A3205 202 R15; A3205 203 R15; A3205 204 R15; A3205 205 R15; A3205 206 R15; A3205 207 R15; A3205 208 R15; A3205 300 R15; A3205 301 R15; A3205 400 R15; A3205 401 R15; A3205 402 R15; A3205 500 R15; A3205 501 R15; A3205 502 R15; A3205 503 R15; A3205 601 R15; A3205 602 R15; 717-FHA-XX-00-DP-L-101 R15; 717-FHA-XX-00-DP-L-105 R15; 717-FHA-XX-00-DP-L-401 R15; Design and Access Statement (dated March 2019); Noise and Vibration Assessment (dated March 2019), Flood Risk Assessment (dated March 2019); Energy Statement (dated March 2016)

Reason: To ensure a satisfactory standard of development, and to allow the local planning authority to review any potential changes to the scheme.

3. AC18 Details of materials pre-commencement

Prior to the commencement of above ground works, details and samples of materials proposed to be used on all external surfaces of the development shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved materials and thereafter so retained.

Reason: In order to assess the suitability of the proposed materials, in the interests of the appearance of the locality, in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019. It is necessary for the condition to be discharged prior to the commencement of works to ensure suitable materials are used in the construction.

4. AC66 Details of boundary treatment

Prior to commencement of the above groundworks, details of the height, design and material of the proposed boundary treatment, including the shipping containers to be retained along the southern boundary shall be submitted to and approved in writing by the local planning authority. The boundary treatment shall be carried out in accordance with the approved details and completed prior to occupation of the development or otherwise in accordance with a timetable agreed in writing with the local planning authority.

Reason: To protect visual amenity ensure a satisfactory appearance and in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

5. AC67 Details of site levels

No development shall take place until full details of existing and proposed site levels 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 development relates satisfactorily to its surroundings, and in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019. It is necessary for the condition to be discharged prior to the commencement of works to ensure the ground levels across the development are compatible with adjoining sites before the site is cleared.

6. AC51- Details of roof equipment

Prior to the commencement of above ground works, details of water tanks, plant, lift rooms or other structures to be erected upon the roof of the approved buildings, 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 and thereafter so retained.

Reason: To control the appearance of the building and safeguard the appearance of the area, in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

7. AC88 Details of ventilation equipment

No external ventilation equipment including ducting shall be installed until details of their location, specification, predicted noise levels including any noise and vibration mitigation measures including ducting, shall be submitted to and approved in writing by the local planning authority. The external ventilation equipment including ducting shall be installed prior to the first occupation of the building in accordance with the approved details and thereafter be so operated and maintained.

Reason: In the interests of neighbour amenity and visual appearance, and in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

8. AC34 Details of screening

Notwithstanding the detail shown on the approved drawings, prior to commencement of the use of the two roof terraces as shown on drawings hereby approved. Details of screening to the terraces shall be submitted to and approved in writing by the local planning authority. The details submitted shall include measurements to ensure that screening shall be to a height of 1.5m above finished floor level and show the material to be used. The screening shall be completed in accordance with the approved details prior to commencement of the use of the terrace/ balcony and be so retained and maintained thereafter.

Reason: To protect the privacy of neighbours by preventing overlooking and in the interest of visual amenity in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

9. AC40 Obscured Glazing

Prior to occupation of the development the obscured window(s) within the co-living rooms shown on page 37 of the Design and Access Statement (doc ref A3205 2 10 RA) shall be obscure-glazed and non-opening (unless the parts of the window which can be opened are more than 1.7 metres above the floor of the room in which the window is installed). The window and door located in corridors also shown to be obscured shall be openable only in the event of fire for means of escape or smoke ventilation purposes. The window[s] and doors shall so be maintained and retained as such.

Reason: To control overlooking, and safeguard the privacy of neighbours in accordance with Council policy DMS1(c) of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019

10. Roof terrace Hours

The two roof terraces hereby permitted shall not be used other than between the hours of:

- (a) 06.30 – 23.00 Mondays - Fridays
- (b) 06.30 – 23.00 Saturdays
- (c) 07.00- 22.30 Sundays

Reason: To safeguard the amenities of the neighbourhood, in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

11. Café/ restaurant hours

The café/ restaurant use (Class C3) hereby permitted shall not be open to customers other than between the hours of:

- (a) 06.30 – 23.00 Mondays - Fridays
- (b) 06.30 – 23.00 Saturdays
- (c) 07.00- 2230 Sundays

Reason: To safeguard the amenities of the neighbourhood, in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

12. Details of Insulation from external noise

Prior to the commencement of above ground works, details of a scheme of measures to insulate the development against noise generated by external noise shall be submitted to and approved in writing by the local planning authority. Such scheme shall include the mitigation measures identified in the Noise and Vibration Assessment (prepared by Mayer Brown dated March 2019). The development shall be carried out in accordance with the approved scheme prior to first occupation and be so retained.

Reason: To protect the occupiers of the building, in accordance with Council policies DMS1 and DMH4(ii) of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019. The details are required prior to commencement of development to ensure the necessary mitigation is incorporated into the construction.

13. Details of insulation between floors:

Prior to the commencement of above ground works, a scheme for the insulation of the co-living rooms against the transmission of airborne sound and impact sound between these rooms and all shared internal amenity areas including the café/restaurant is submitted to and approved in writing by the local planning authority. The approved scheme shall be implemented prior to the first occupation of any dwelling and shall be retained thereafter.

Reason: To safeguard the amenities of residential occupiers, in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019. The details are required prior to commencement of development to ensure the necessary mitigation is incorporated into the construction.

14. Archaeology

No demolition or development shall take place until a 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, which shall include the statement of significance and research objectives, and

A. 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. 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 WSI

The written scheme of investigation must be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

For the avoidance of doubt, the archaeology work shall include geoarchaeology coring and field evaluation. Reference should be made in this regard to the representations of Historic England dated 19 March 2019 in respect of this planning permission.

Reason: To safeguard the archaeology interest of the site in accordance with DMPD (2016) policy DMS2.

15. Water Pressure

No rooms shall be occupied until confirmation has been provided that either:

All water network upgrades required to accommodate the additional flows from the development have been completed; or

A housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

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

16. Contaminated Land

PART A: Prior to the commencement of works on the development hereby approved, an investigation into ground conditions shall be undertaken in accordance with the Model Procedures for the Management of Land Contamination, Environment Agency, Contaminated Land Report 11. The report of the investigation and proposals for any remediation required shall be submitted to and approved in writing by the Local Planning Authority.

All works approved shall be undertaken to the satisfaction of the Local Planning Authority.

PART B: As soon as reasonably practicable, and before the occupation of any remediated area of the site, a validation report shall be submitted and approved by the Local Planning Authority in writing, stating what works were undertaken and that the remedial scheme was completed in accordance with the approved remediation strategy.

Reason: To safeguard the public, the environment and surface and groundwater as this site may have or is known to have been used in the past for activities that are likely to have resulted in it being contaminated with material that is potentially harmful to humans, or the environment. It is necessary for this condition to prevent commencement.

17. Dust Management Plan

Prior to the commencement of development, a Dust Management Plan (DMP), based on an AQDRA (Air Quality and Dust Risk Assessment), shall be submitted to and approved, in writing, by the local planning authority. The DMP shall be in accordance with The Control of Dust and Emissions during Construction and Demolition SPG 2014. The DMP will need to detail the measures to reduce the impacts during the construction phase. The development shall be undertaken in accordance with the approved plan.

Reason: To manage and prevent further deterioration of existing low quality air across London in accordance with London Plan policy 5.3 and 7.14, and NPPF 181. It is necessary to secure these details as the submitted AQA is not exhaustive.

18. Air Quality Monitoring

During and after demolition and construction works (and a month prior to commencement of any works on site), PM10 monitoring shall be carried out on site. Parameters to be monitored, duration, locations and monitoring techniques must be approved in writing by Wandsworth Council prior to commencement of monitoring.

Reason: To manage and prevent further deterioration of existing low quality air across London in accordance with London Plan policy 5.3 and 7.14, and NPPF 181. It is necessary to secure these details as the submitted AQA assessed the pre-mitigation risk of dust as Medium Risk for all the construction activities.

19. Construction tools

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 of the development 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 any subsequent guidance. All major development sites in Greater London shall keep an inventory on site and on the online register at: <https://nrmm.london/> of all NRMM between 37kW and 560kW. All NRMM shall meet Stage IIIA of EU Directive 97/68/EC (as amended) as a minimum within Greater London (Stage IIIB from 1st September 2020) and Stage IIIB of EU Directive 97/68/EC as a minimum within the Central Activity Zone (Stage IV from 1st September 2020).

Reason: To manage and prevent further deterioration of existing low quality air across London in accordance with London Plan policy 5.3 and 7.14, and NPPF 181.

20. Arboriculture Method Statement

No demolition works shall take place until an arboricultural method statement has been submitted to and approved in writing by the local planning authority. This shall include details of:

The measures taken to protect existing trees and hedges during demolition, construction, and delivery of materials and machinery. To include a Tree Protection Plan and protection measures in line with BS5837:2012, with details of: methods of demolition, removal of hard surfacing, driveway/roadway construction, consideration of utility/service runs, ground protection measures, tree protection fencing, positioning of site huts/storage areas and specialist foundation design. To include a programme of Arboricultural site supervision, with pre-commencement check.

Reason: To safeguard trees and hedges on the site in the interests of visual amenity and the character of the area, having regard to policy DMO5 (b) coupled with the requirements of the National Planning Policy Framework 2019

21. Retained Tree Protection

In this condition 'retained tree' means an existing tree or hedge, which is to be retained in accordance with the approved drawings and specifications. Paragraphs (a) and (b) below shall have effect until the expiration of 5 years from the first occupation of the development.

a) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned other than in accordance with the approved drawings and specifications, without the written approval of the Local Planning Authority. Any pruning shall be carried out in accordance with British Standard 3998:2010 Tree work and in accordance with any supplied arboricultural method Statement

b) If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority

c) Tree protection shall be maintained in-situ and not moved or removed until all construction has finished and equipment, materials, or machinery are removed from site

d) All arboricultural protection information and plans submitted as part of the application, and listed in the approved drawings condition, shall be implemented and adhered to at all times during the construction process unless otherwise agreed in writing with the Local Planning Authority. This shall include a comprehensive timetable of arboricultural site supervision

e) This permission shall lapse if any retained tree is felled, pruned or relocated prior to the commencement of development unless otherwise agreed in writing by the Local Planning Authority

Reason: To safeguard trees and hedges on the site in the interests of visual amenity and the character of the area, having regard to policy DMO5 (b) coupled with the requirements of the National Planning Policy Framework 2019

22. Pre-commencement tree meeting

No demolition works shall take place until tree protection measures are installed and any further information is provided in accordance with the submitted arboricultural information. The applicant shall arrange a pre-commencement meeting with the Local Planning Authority and the applicant's project arboriculturalist to allow inspection of the protection measures.

Reason: To safeguard trees and hedges on the site in the interests of visual amenity and the character of the area, having regard to policy DMO5 (b) coupled with the requirements of the National Planning Policy Framework 2019

23. Landscaping

Prior to commencement of the above ground works a landscaping scheme to include landscaping and treatment of parts of the site not covered by buildings, the two roof terraces and green roof, shall be submitted to and approved in writing by the local planning authority. These details shall include hard landscaping works including proposed finished levels and contours, and SuDs measures; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; the lighting column design, height and material(s); soft landscaping including the species and height of tree planting and root volumes, shrubs, plants and seeding; green/brown roof specification; bat and bird boxes; minor artefacts and structures (e.g. furniture equipment, refuse or other storage units, signs, lighting); proposed and existing functional services above and below ground (e.g. drainage power; communications cables, pipelines, indicating lines, manholes, supports); retained historic landscape features and proposals for restoration. The landscaping scheme shall also include details of the mitigation measures identified in the Pedestrian Level Wind Desk-Based Assessment (prepared by RWDI March 2019).

The landscaping scheme shall be carried out in accordance with the approved details and completed prior to the occupation of the development, or in accordance with a programme agreed in writing with the local planning authority.

Reason: To ensure a satisfactory appearance, provide tree planting and biodiversity improvements, in accordance with Council policies DMS1, DMO4 and DMO5 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019. The details are required prior to the commencement of works to ensure the landscaping measures are incorporated in the layout and construction of the development.

24. Flood Risk Assessment

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment by Mayer Brown dated March 2019

The mitigation measures shall be retained as such.

Reason: To reduce the risk of flooding to the proposed development and future occupants, and third parties in accordance with policy DMS5 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019

25. Surface water drainage

No development shall take place until details of surface water drainage, which shall follow the principles of sustainable drainage as far as practicable, shall be submitted to and approved by the local planning authority. The drainage shall be provided in accordance with the approved details before first occupation of the development.

Reason: In order to secure a satisfactory standard of development, having regard to Council policy DMS6 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019. The details are required prior to the start of the works so that the necessary drainage measures can be incorporated into the construction.

26. Drainage Strategy

No development shall take place until a drainage statement be submitted to and approved in writing by the local planning authority. The drainage statement shall include details of how drainage of the site has been designed so as to prevent discharge of water into the River Wandle. The development shall be carried out in accordance with the approved drainage statement before first occupation of the development.

Reason: In order to secure a satisfactory standard of development, having regard to Council policy DMS6 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019. The details are required prior to the start of the works so that the necessary drainage measures can be incorporated into the construction

27. Existing bridge works

Should any improvement works be carried out to the existing Trewint Street vehicular bridge, details of these improvement work shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of these works. For the avoidance of doubt, the technical approval of the Councils Wandsworth Borough Council's Highway Engineering will be required for these works.

Reason: to ensure safe access to the site can be secured in accordance with DMPD (2016) policy DMT1

28. Electric vehicle charging

Prior to the occupation of the development hereby approved, details of electric vehicle charging points for the two on-site disabled spaces shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To accord with the provisions of DMPD (2016) policy DMT2vii.

29. Cyclist Road Safety Audit

Prior to the commencement of the development hereby approved, a scheme to ensure cyclists can safely cross the existing Trewint Street vehicular bridge in accordance with a Stage 1 Road Safety Audit shall be submitted to and approved in writing by the local planning authority. For the avoidance of doubt, the scheme shall consider the provision of signage and the maintenance of sight lines.

Reason: To ensure safe access in accordance with DMPD (2016) policy DMT1.

30. Cycle Parking

Prior to first occupation of the development hereby approved, , details of the location, number and design of secure and covered cycle parking shall be submitted to and approved in writing by the local planning authority. The cycle parking shall be provided in accordance with the approved details prior to the occupation of the development and be retained for cycle parking purposes for the users of the development and for no other purpose.

Reason: To ensure adequate provision is made for cycle parking in accordance with Council policy DMT2 of the Development Management Policies Document (2016) coupled with the requirements of the National Planning Policy Framework 2019

31. Parking and Servicing Management Plan

Prior to first occupation of the development hereby approved, details of a Parking and Servicing Management Plan shall be submitted to and approved in writing the local planning authority.

Reason: To ensure safe a suitable access to the site can be achieved in accordance with DMPD (2016) policy DMT1.

32. Vehicular Parking Management

Prior to first occupation of the development hereby approved, details of a Vehicular Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include measures to ensure residents, employees, and visitors will be prevented from parking within the informal shared space area to the west of the bridge and south of the main building.

Reason: To ensure safe a suitable access to the site can be achieved in accordance with DMPD (2016) policy DMT1.

33. Refuse and recycling bins

Prior to the commencement of above ground works, details of the siting, design and materials of refuse and recycling storage to serve the development shall be submitted to and approved in writing by the local planning authority. The refuse storage facilities shall be provided in accordance with the approved details prior to occupation of the development and shall be retained thereafter.

Reason: In the interests of amenity and hygiene, in accordance with Council policy DMS1 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

34. Private collection waste strategy:

Prior to the first occupation of the development hereby approved, an operational waste and recycling strategy shall be submitted to and approved in writing by the local planning authority. The submitted operational waste and recycling strategy shall include details of the arrangements for storage and collection of waste from the development. The measures detailed in the approved operational waste and recycling strategy shall be installed prior to first occupation of the development and operated and maintained in accordance with the approved operational waste and recycling strategy in perpetuity. For the avoidance of doubt, the strategy shall include details of private waste and recycling collection.

Reason: To ensure adequate refuse storage is provided on site and can be readily collected, to accord with Council policies DMS1 and DMT2 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

35. Fire safety

Prior to the occupation of the development hereby approved, details of a fire hydrant to be sited on the footpath within Mill Yard shall be submitted to and approved in writing by the Local Planning Authority. For the avoidance of doubt, the hydrant shall not be sited in a grass verge, flower bed or parking area, the hydrants should be one metre clear of all obstructions, with the outlet no more than 300mm below the finished ground level. The hydrants should conform to BS:750 and be indicated with a hydrant indicator plates conforming to BS:3251.

Reason: To ensure the development is adequately serviced in accordance with DMPD (2016) policy DMS1f.

36. Protected species methodology

Prior to commencement of the development hereby approved, submit for approval methodology and results of further survey work for riverine / aquatic species including fish, aquatic invertebrates, and Invasive Non-Native Species (in particular INNS identified as being of concern in the London Invasive Species Initiative and River Wandle Invasive Species Action Plan) along with a detailed understanding of the impacts of shading and micro climate changes arising from development proposals on these species. Include any findings in revised proposals for riverine enhancement, in any necessary mitigation required to ameliorate impacts of shading and micro climate change and long-term habitat and invasive species non-native management.

Reason: to prevent harm to the River Wandle Site of Importance for Nature Conservation and / or any protected species and where necessary to ensure appropriate mitigation measures in accordance with DM04a

37. Landscaping bio-diversity

Prior to commencement, submit for approval details (including structure, functionality and species choice) of all landscaping of biodiversity value including but not limited to proposals for in channel, bank side and river islet habitat enhancement; a detailed specification for the creation of the biodiversity roofs under PV to also include information on accessibility for maintenance; details of integrated habitat features for bats and birds; details of the proposed SUDS gardens and a whole site landscape monitoring (including rationale and details of methodologies) and management plan to ensure measures required for the management of biodiversity habitat and features are fully integrated. Also submit details of external signage and wayfinding to demonstrate compliance with the Wandle Gateway programme of the Wandle Valley Regional Park.

Reason: to provide gains for biodiversity in accordance with DM04b and to deliver Wandle Valley Regional Park objectives in accordance with DM06b

38. External Lighting

Prior to completion of the development, submit for approval a whole site external lighting strategy demonstrating how light spill of one lux or greater will be prevented from affecting the River Wandle, the railway lineside SINC and any habitats and features for provided for biodiversity enhancement. This should demonstrate compliance with Guidance Note 08/18 Bats and artificial lighting in the UK Bats and the Built Environment series by the Institute of Lighting Professionals and the Bat Conservation Trust. Reason: to prevent harm to Site of Importance for Nature Conservation and / or any protected species and where necessary to ensure appropriate mitigation measures in accordance with DM04a

39. Japanese Knotweed and Other Invasive Species

Prior to commencement of development or any demolition on site, a survey to map the extent and location of Japanese Knotweed and all other Invasive Non-Native Species and a management plan to ensure these do not spread either on or off the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall be carried out in accordance with the details as approved.

Reason: to provide ecology enhancement in accordance with DMPD policy DMO4. It is necessary to secure these details to ensure opportunities to remove invasive species is secured.

40. Co2 Reduction

The development shall be built in accordance with the submitted Energy Statement by WSP dated March 2019 demonstrating how the development will follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies to secure a minimum 36% reduction in CO2 emissions below the maximum threshold set in Building Regulations Part L 2013. Prior to first occupation of the development, evidence (e.g. photographs, copies of installation contracts and as-built worksheets prepared under SAP or the National Calculation Method) shall be submitted to the local planning authority and approved in writing to demonstrate that the development has been carried out in accordance with the approved Energy Strategy. The installed measures shall be retained in accordance with the approved details unless otherwise agreed by the local planning authority.

Reason: In the interest of sustainable development and to accord with London Plan policy 5.2 and Council policy DMS3 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

41. BREEAM post commencement

Within six months of the commencement of development, a BREEAM Interim (Design Stage) Assessment issued by the Building Research Establishment (BRE) or equivalent accredited body, shall be submitted to and approved in writing by the local planning authority to show that a minimum Excellent rating will be achieved for the building. The development shall be implemented in accordance with the approved rating.

Reason: To achieve appropriate sustainability standards in accordance with Council policy DMS3 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

42. BREEAM post completion

Within six months of the occupation of the building a BREEAM New Construction Final (Post-Construction) Certificate, issued by the BRE (or equivalent accredited body), shall be submitted to and approved in writing by the local planning authority to demonstrate that an Excellent rating has been achieved. All the measures integrated shall be retained for as long as the development is in existence.

Reason: To achieve appropriate sustainability standards in accordance with Council policy DMS3 of the Development Management Policies Document (adopted March 2016) coupled with the requirements of the National Planning Policy Framework 2019.

(b) If an acceptable Section 106 planning obligation has not been completed by 25 November 2019 (or such other date as agreed between the LPA and applicant in writing) then the Assistant Director Planning & Transport be delegated authority to refuse planning permission for the reason that the proposed development, in the absence of the requirements set out in the Heads of Terms Section of this report, would not be accompanied by the necessary provisions and contributions to affordable housing and/or to mitigate the impacts of the proposed development, contrary to Policy IS7 of the Core Strategy (March 2016) and the Planning Obligations SPD (March 2015).