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WOLFSON SITE, COPSE HILL, SW20 - PLANNING APPLICATION 16/P4853 FOR THE ERECTION OF 4 X FLATTED BLOCKS RANGING FROM 3 TO 6 STOREYS IN HEIGHT TO PROVIDE 85 RESIDENTIAL UNITS WITH ASSOCIATED ARRANGEMENTS INCLUDING BASEMENT CAR PARKING, THE PROVISION OF PUBLIC AND PRIVATE LANDSCAPED SPACES AND AN EAST-WEST PEDESTRIAN ROUTE.

Dear Ms Wright,

I write on behalf of LUNG to object strongly to this planning application to build 4 blocks of flats, one of which is 6 storeys high, with a total of 85 flats. The application site is in the Copse Hill Conservation Area, and adjacent to Metropolitan Open Land (MOL), part of which is also designated as a Site of Importance for Nature Conservation (SINC). The MOL is to be transferred into Council ownership as part of the developer's existing obligations in the planning consents for the Atkinson Morley Hospital site, and will then become a public park, known as Morley Park. The currently approved 2 schemes for the area are for a total of 16 houses.

LUNG sees this proposal as an enormous threat to the Copse Hill Conservation Area, Morley Park, the amenity and health of local residents, and the wider environment. It is too intensive, too high, too dominant, too polluting and totally unsuitable in this area which is described in the conservation area character assessment as having a semi-rural character. The proposed development is of such

height, mass and density that it would only be appropriate in a town centre location with good transport links, which this site certainly does not have.

LUNG objects strongly to this application for the reasons detailed below.

The density of the proposed development is far in excess of the recommended level for a site with poor access to public transport

The area is poorly served by public transport with only the 200 bus in easy walking distance. This is confirmed by the Public Transport Accessibility Level (PTAL) of 1.

The planning documents variously claim that the number of habitable rooms would total 256 (Design and Access Statement) and 278 (Planning Statement). The Planning Statement says that the resulting density would be 318 habitable rooms per hectare and suggests that the area used in this calculation (0.88 hectares) excludes the 'Wolfson lawn'. The area over which the density is calculated nevertheless appears to have been overstated as the access to the site from Atkinson Close, and the unfenced landscaped strip of land adjacent to it, are included in the development site. The access road was built as part of the Firs development and already provides access to it. The access road and landscaped strip are both MOL. Exclusion of these areas would reduce the area to 0.82 hectares and assuming 278 habitable rooms would result in a density of 339 habitable rooms per hectare.

The acceptable density for a site with a PTAL rating of 1, as set out in the London Plan SPG density matrix, is 150-200 habitable rooms per hectare.

The proposed development would be inconsistent with the character of the Conservation Area and the Copse Hill street scene

The proposed development is in the Copse Hill Conservation Area which is a 'heritage asset'. The character assessment for the conservation area describes it as having a semi-rural character with the buildings on Copse Hill being in harmony with the extensive open land to the south. The Wolfson rehabilitation centre which had a low profile that permitted uninterrupted views from Copse Hill to the open land below is being replaced with 5 and 6 storey buildings. The canyon between the high rise blocks would give views over the woodland, but a view seriously impaired by the high buildings on either side which would certainly not be in harmony with the open land beyond. The adjacent locally listed hospital building makes a major contribution to the character of the conservation area. A large block of flats of similar size and scale to this building would significantly detract from the importance and impact of this building. The proposed development would thus be contrary to the National Planning Policy Framework para. 131 and Local Plan policy DM D4f which states that 'proposals affecting a heritage asset or its setting should conserve and enhance the significance of the asset.'

Apart from the Wimbledon Hill Park development, homes on Copse Hill are mainly large detached 2 storey houses, sitting on large plots, with considerable gaps between the houses.

The proposed development would thus also be contrary to policy DM D2a i which requires developments to 'relate positively and appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area;' and DM D2a ii ' Use appropriate architectural forms,

language, detailing and materials which complement and enhance the character of the wider setting.'

The close proximity of the proposed development to MOL would have a seriously adverse impact on the amenity value of the MOL

The ground across the development slopes down steeply from north east to south west by around 10 metres whilst the MOL continues to slope in a south westerly direction by a further 10 metres over a distance of around 290 metres towards Cottenham Park Road. This large change in height would greatly increase the negative impact of the proposed development on the MOL.

Visual Amenity

The 6 and 5 storey Blocks A and B are so close to the MOL that balconies on the western side of Block A, and at the southern end of Block B are right up to the MOL/Morley Park boundary. The mass of these buildings is excessive as they are not only high but also have very large footprints and mansard roofs. The visual dominance of these buildings when viewed from the east or west would be huge. As the land slopes down to the south, and slopes down very steeply to the west, the visual intrusion into these areas would be amplified. The applicant suggests that these high blocks would be shielded from view by trees. Trees will offer very little visual shielding for half the year and none from some locations. The locations and season used for the CGI views from Morley Park are not a fair representation.

The development would result in a loss of the feeling of openness of the MOL and urbanise the nature conservation areas of Morley Park. The enjoyment of those walking on Morley Park, especially when walking on the meadow, the path down from Atkinson Close, the Wolfson Lawn, the woodland walk, and the southern end of the north/south route would be seriously impaired.

The MOL boundary to the west of Atkinson Close is not shown on the plans. It should be shown to permit assessment of the impact of adjacent buildings on the MOL.

The proposals fail to comply with policy DM 01e 'Development in proximity to and likely to be conspicuous from MOL ... will only be acceptable if the visual amenities of the MOL ... will not be harmed...'. Paragraph 5.5 of the Merton Core Planning Strategy; states; 'Development of land outside the boundaries of MOL, but in proximity to it, may damage the open character of the MOL. MOL therefore needs to be protected from development proposals which would be visually intrusive, particularly high buildings or other high structures.' It is also inconsistent with the Planning Brief for the Atkinson Morley Hospital Site (2003) which at 2.14 states that 'Any new development on land outside, but adjacent to the MOL will be expected to protect its visual amenities and open character' and at 2.13 where it states that 'Part of the MOL is within a SINC and a buffer zone is likely to be required'.

Overshadowing and privacy

The height, mass, and proximity of the Blocks A and B to the MOL on the western and southern boundaries would cause overshadowing. The balconies and large windows are so close to the boundary they would cause overlooking of the MOL and loss of privacy to both people in the park and residents of the flats.

Block B would also cause overshadowing of the north/south route.

Policy DM D2a v says all developments should ‘ensure provision of appropriate levels of sunlight and daylight.....and privacy, to both proposed and adjoining buildings and gardens.

The close proximity of the proposed development would cause light pollution into the adjacent SINC woodland

It would adversely affect biodiversity (DM D2a vii) and would fail to conserve and enhance the natural environment, particularly in relation to biodiversity and wildlife habitats and gardens (DM D2a viii). It would also be contrary to Policy 7.19 of the London Plan

The balconies, large windows and roof terrace of Block B would cause serious light pollution in the SINC woodland. The higher level windows and balconies would cause light pollution in the canopies of the trees. The SINC woodland is home to nocturnal animals including bats. This is confirmed in the Ecological and Biodiversity Statement submitted as part of the original 2011 application which found evidence of the woodland being used as a foraging area for bats and the presence of badgers and has been reconfirmed in subsequent studies. Bat boxes have already been installed in the woodland as part of the requirements of the 2011 consent. The proposed path linking the new development and the woodland walk would go between 2 badger setts.

Para. 9.7 of the Planning Statement in this application notes that a survey reconfirmed the presence of badger setts in the woodland. However despite the SINC designation of the site and all the evidence of the presence of badgers and bats the Ecological Report unbelievably also states that it considers ‘the habitats present in both 2014 and 2016 are types that have very limited intrinsic interest, are very common and readily recreated.’

Flooding risk

The plans include an underground car park to accommodate 86 cars.

The south western corner of the adjacent Morley Park has had considerable drainage problems since autumn 2015, culminating in repeated flooding of the scout site, Cottenham Park Road, and the adjacent public right of way in summer 2016. The problems started at a time when work was in progress on the Wimbledon Hill Park development, which is uphill of the flooding. Berkeley Homes completed remedial works to address what they are treating as a surface water problem in December 2016. Since then, on both occasions after normal rainfall, water has been seen to flow from the ground in a bank adjacent to Cottenham Park Road. The developer is now considering next steps. The application documents suggest that the drainage/flooding problem has been resolved. It has not. If the current problem is in any part down to groundwater the addition of more extensive underground works on the Wolfson site poses an additional threat of disruption to underground flows of water and problems for areas downhill of the works.

We note that in the Flood Risk Assessment it says ‘New sports field drainage within the MOL will further mitigate the risk of groundwater downstream of the Wolfson site and in Cottenham Hill (sic) Road.’ LUNG was not aware that the sports field drainage had been designed to deal with groundwater coming from Wimbledon Hill Park.

Policy DMD2c says "The Council will require an assessment of basement and subterranean scheme impacts on drainage, flooding from all sources, groundwater conditions and structural stability...and if they do not cause harm to the to the built and natural environment and local amenity and do not result in flooding or ground instability"..

The quality and quantity of the public and private amenity space within the development would be poor

The height, mass and proximity of the blocks of flats will result in loss of light to the flats, and to the private and public amenity space within the development.

This urban public open space would be of such poor quality it is unlikely to attract people from outside the development. The visual amenity of the space, and the light level would be very poor due to the height and mass of the adjacent buildings. The path includes a steep flight of steps at the eastern end with the alternative of a lift. There is no need for a public path in this position as there are better alternatives available without steps. The 'public space' would be very unlikely to be used by anyone other than the predicted 180 residents of the development.

The proposals would thus be contrary to policy DM D2a v which requires 'appropriate levels of sunlight and daylight, quality of living conditions amenity space and privacy, to both proposed and adjoining buildings and gardens.

Serious traffic and safety issues

Facilities for refuse collection and safety issues in Atkinson Close

Atkinson Close is used by the 200 bus, with a bus going through on average every 3.5 minutes during the day. It will also provide pedestrian access to Morley Park, vehicle access to the proposed Wolfson underground car park, access for collection of refuse, and vehicle access to rear houses on the Firs site.

According to the sweep analysis in the Transport Assessment refuse vehicles would have to use the gated private road into the Firs development to turn. If this access was not available refuse lorries would have to reverse into the Wolfson access road.

The already dangerous conflict between the various users would be made worse by any large vehicles having to reverse into the Wolfson access.

Facilities for deliveries, drop off and visitor parking on the north/south route

Prior to the addition of any traffic for the Wolfson development the north/south route will be used by pedestrians, cyclists, and vehicles going into and out of the 92 AMH underground car park spaces and 19 parking spaces in front of the west wing of the hospital. It also provides access for deliveries to the hospital site and refuse collection vehicles. There is no separate path for pedestrians. It is a shared surface.

The proposed turning circle adjacent to the north/south route would be the only provision for deliveries to this proposed development. The turning circle would also be used as a drop off point. This is totally inadequate for the number of deliveries 85 flats would generate. With the growth in online shopping for everything from groceries, to books, to furniture, there would be a high volume of vehicles of all sizes competing to use the turning circle. The analysis in Appendix F of the Transport Assessment shows that a 4.6 ton light van can just manage to use the turning circle by doing a 3 point turn in the turning circle. In all cases vehicles would have to be parked while the delivery was made to the concierge or flat. In the Design and

Access Statement it says that the concierge facilities for the development are in Block C. This must surely be an error as the only direct and level access into the development from the turning circle is into the first floor of Block B. There is no access to other blocks from the entrance area of Block B other than down 2 levels to the car park, and across the car park to access the other blocks. Quite a mission if items are heavy or bulky.

There is no provision for deliveries by any vehicle larger than a 4.6 ton van. Where will removal lorries and lorries delivering bulky items turn and wait while the delivery is made? Presumably these deliveries will have to be made to the flat.

There is no separate provision for parking delivery vehicles of any size. This would generate unacceptable congestion and safety issues on the north/south route.

6 visitor parking spaces are shown on the eastern boundary of the development site, adjacent to the north/south route. There would be insufficient space for cars to turn and so would have to reverse either into or out of the spaces onto the north/south route. The parking spaces are on the root protection area of 2 London plane trees. These trees would restrict visibility for drivers when parking.

The proposed provision for refuse collection, deliveries and visitor parking are contrary to policy DMT2 which says development proposals should not impact 'adversely on the road or public transport networks, safety or congestion'; and policy DM D2 iii which requires development proposals to 'Provide layouts that are safe.'

Junctions, traffic volume and air pollution

Copse Hill is already a busy road with traffic building up and forming long queues at junctions, especially the junction with Coombe Lane. The additional traffic generated by the proposed development, combined with the additional traffic generated by the approved Wimbledon Hill Park development will exacerbate the problem. Copse Hill is in an Air Quality Management Area (AQMA). London Plan Policy 7.14 states that in areas of poor air quality developments should be at least air quality neutral.

The 'Wolfson Lawn' – the developer's obligation in the S106 for the hospital site, as modified by the Second Deed of Modification should be enforced

An area just to the south of the Wolfson site, commonly known as the 'Wolfson Lawn', was added to the land to be transferred to the Council for Morley Park as part of the consent for the 2 blocks of flats behind the old hospital building. (Second Deed of Modification dated 31st March 2014). In this planning application the Wolfson lawn, and a finger of land going into the Morley Park woodland, is included in the BH Wolfson development site. It is not acceptable to include the 'Wolfson Lawn' in the development site. This area should be transferred to the council with the rest of the MOL as previously agreed. This transfer is currently expected to happen in April 2017 and should not be delayed.

Misleading information in the planning application documents on the increase in open space

Misleading information on additional open space

3.4 of the 'Landscape Design and Access Statement' demonstrates improved MOL access by comparing the consented Wolfson scheme (footprint of the buildings is the 15/P2029 consent for 11 houses) with the proposed Wolfson scheme. The plans used are inaccurate and very misleading.

- The consented scheme for the Wolfson site (15/P2029) included an agreement to transfer a 70m² strip of land adjacent to house P04 to the Council for inclusion in Morley Park. In this application the 70m² is included in the development site with no proposal for future transfer to the Council. The 2015 approval is not being built, so all agreements subject to its implementation go, but should at least be acknowledged and accurately shown when comparisons are made.
- Further north the consented scheme western boundary with Atkinson Close is incorrectly shown as immediately adjacent to the road i.e. the same as the proposed scheme. The consented scheme boundary of the garden of house P01 was set back from the road.

The planning documents thus overstate both the amount of additional land to be transferred to the Council for Morley Park, and the amount of land open to public access.

Additional land to be designated as MOL / transferred to Council ownership is welcome but needs to be clarified

- LUNG welcomes the proposed MOL designation of 1043 m² of land adjacent to the north/south path, and its transfer to the Council for inclusion in Morley Park. No fencing is shown between this proposed addition to Morley Park and the north/south route. This would be required to maintain the security of Morley Park at night.
- The planning documents also need to make clear the loss of the transfer of 70m² to MOL/Council ownership previously agreed as part of the 2015 Wolfson consent.
- A small additional area of land (not MOL), south of the private garden which opens onto Morley Park, is shown as publicly accessible from Morley Park in the plans i.e. it is south of the development railings but north of the MOL boundary. There is no mention of designation of this area as MOL or a transfer of this area to the Council for inclusion in Morley Park in the Design and Access Statement or the Planning Statement. LUNG therefore assumes the intention is that this area would remain in the ownership of the developer.

Privileged private access to the new public park is unacceptable

The Council has decided that Morley Park will be fenced and locked at night.

A gated entrance is shown from the private garden of the proposed development onto the strip of privately owned land and then down into the MOL/Morley Park. No boundary treatment is shown between the privately owned land and Morley Park. This is an unacceptable security risk for a park that will be locked at night and provides privileged private access to a public park. The proposed landscaping and path into it, specifically for the use of residents, would give the 'Wolfson Lawn' the appearance of, and would probably be treated as, a private garden for the Wolfson residents. The residents of the development would have such easy access that they could easily carry tables, chairs etc. onto the lawn. The residents of the new development would in any case have good access to the park from the north/south route and the Atkinson Close entrance. The public park cannot be used as a substitute for the shortage of good quality on-site amenity space.

A secure fence, with no gate, is required between the privately owned land and the council owned Morley Park.

Additional path into Morley Park from the north/south route

There is no requirement for an additional path into Morley Park just north of the Woodland Walk through the SINC. This would require an additional gate into Morley Park, which in turn would generate additional locking/unlocking expense for the park which will be locked at night.

The fence now being erected along the western side of the north/south route would need to be extended to the boundary of the new development.

Any approval for this site should include a condition that the north/south route be kept open at all times

The north/south route is an important and heavily used through route for pedestrians and cyclists. The route has been closed for 6 years to accommodate works on the adjacent hospital site. The route should be reopened as soon as it is safe to do so, and as required by existing planning consents. No extension of this closure should be granted to accommodate any future development of the Wolfson site. This is needed for the benefit of all local residents and cyclists wishing to use the through route, including the new residents of Wimbledon Hill Park, and to provide access for park users.

Closure of the north/south route would be contrary to policy DM D2a xiii. to 'Ensure that the traffic and construction activity do not adversely impact or cause inconvenience in the day to day lives of those living and working nearby '

Affordable housing provision is below the target level

The current proposal of only 25 affordable units (30%) out of the 85 flats is inadequate. The Planning Statement notes Policy CS8 of the Merton Core Strategy which sets a target of 40% affordable housing on sites providing 10 or more homes, and London Plan Policy 3.11 seeks to maximise affordable housing.

Conclusion

For the reasons detailed above LUNG believes the proposed development would cause unacceptable harm to the local area, and is contrary to National, London and Local Plan policies. There is very strong evidence to say that this application should be refused.

Yours sincerely

Jane Barnes

LUNG

Cc Stephen Hammond MP

Village and Raynes Park Ward Councillors

Councillor Nick Draper

Councillor Alambritas

Julia Waters

Dave Dawson

Doug Napier

Sarah Tanburn