



London Borough of Merton

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Dear Sir / Madam,

**Local Plan 2020 – Stage 2 Consultation Draft
Representations on behalf of Clarion Housing Group.**

Clarion Housing Group owns and manages around 10,000 homes in Merton and is one of the Council’s preferred Registered Providers of affordable housing. Clarion supports the strategic objective of the draft Local Plan to deliver new homes and employment opportunities, to make Merton a healthier place and to deliver high quality urban environments.

The Council transferred its housing stock to Clarion (formerly Circle Housing Merton Priory) in 2010. Under the transfer agreement, Clarion is required to upgrade all homes to Decent Homes Standards. Since 2010 Clarion has invested significantly in modernising and upgrading Merton’s housing stock, including committing many millions of pounds to the full regeneration of some of the poorest quality homes. Clarion continue to explore opportunities for further significant investment with a view to delivering greater sustainability benefits, new homes, employment and training opportunities and enhanced community infrastructure in Merton.

As part of this, Clarion is already engaged in major investment programmes at High Path, Eastfields and Ravensbury. A resolution to grant outline planning permission for the regeneration of these three estates has already been secured by Clarion, and as part of this over 2,700 new homes will be delivered, alongside new employment and community spaces, and new open space. Policies addressing the regeneration of these estates, contained within the Estates Local Plan (2018), are to be saved as part of the new Local Plan.

The work to continually improve and extend the life of Clarions’ existing housing stock in Merton will continue over the 15 year Plan period, and this will include the potential for significant programmes of refurbishment and/or regeneration of other neighbourhoods where the need is greatest and where opportunities for sustainable development exist. A programme to confirm which neighbourhoods are in greatest need of investment and the form that investment might take is already underway. This is likely to confirm a series of potential programmes of improvement to be developed and delivered over the Plan period.

With this in mind Clarion has comments on both specific polices and site allocations in the draft Local Plan.

Policies

Objective / Policy	Clarion Comment
Strategic Objective 3 – Housing	Clarion welcomes the objective to provide new homes through physical regeneration, delivering higher density housing in places with good public transport access.



<p>H4.1 – Housing Choice Requires compliance with Building Regulations Requirement M4(2) and M4(3)</p> <p>Setting out an affordable housing target of 50% for public sector land, and up to 50% for other land with a minimum of 355 provision. It also requires a tenure split of 70% for low cost rent and 30% for intermediate housing. A range of housing type is also required.</p>	<p>Whilst Clarion is generally supportive of the requirements to achieve accessible and adaptable dwellings, it is important that this policy or supporting text acknowledges that compliance with Building Regulation Requirement M4(2) can result in viability and service charge affordability issues, particularly in smaller flatted blocks. As such, as per the flexibility acknowledged in the Mayors Housing SPG (DATE), adopted and draft New London Plan, the Local Plan 2020 should recognise that in some circumstances this requirement would not be imposed.</p> <p>As a Registered Provider, Clarion supports the ambition of the affordable housing policy and also that it acknowledges that viability plays an important role in the delivery of housing.</p>
<p>H4.2 – Housing Provision</p>	<p>Clarion support the general principles of this policy. However, Clarion consider that support should be provided within the policy for the refurbishment, regeneration and intensification of existing housing to deliver better quality homes, particularly where this results in:</p> <ul style="list-style-type: none"> • improvements to the social, economic and physical environment in which the homes are located • safe and better quality homes for local people • increased supply of new and affordable homes • and / or improvements in the quality of the local environment through a better public realm. <p>In this way, the policy would consider the social, economic and environmental benefits of estate regeneration, and would ensure the delivery of estate regeneration projects to a high standard in line with paragraph 93 of the NPPF.</p>
<p>H4.3 – Housing mix Requiring a range of housing mix</p>	<p>Clarion notes that the suitability of a type of housing (family sized or smaller) is often predicated by the local environment. Furthermore, in proposals involving existing homes, an important consideration in determining the appropriate housing mix would be the needs of existing residents and wider viability considerations.</p>
<p>D5.1 f) – Tall buildings Proposals for tall buildings will be permitted only within town centres in Colliers Wood, Morden and Wimbledon.</p>	<p>The wording of this policy limits the opportunity for development within the borough. The new Local Plan will set out policies for development in the borough for the next 15 years and, in this context, the policy is short-sighted. In particular there is a risk the policy will limit opportunities to provide new homes and commercial opportunities in and around public transport hubs and stops in residential areas.</p> <p>Additionally Mitcham town centre is currently excluded. Given the quantum of new homes planned for Mitcham and its obvious potential for additional housing, commercial and employment growth, a strong case can be made for its specific reference in policy. This would build on the</p>

	<p>significant investment in the town centre from the London Borough of Merton and TFL in recent years.</p> <p>The draft London Plan includes Mitcham as a District Centre but includes Colliers Wood only a future, potential District Centre. It would be reasonable to afford Mitcham at least the same importance as Colliers Wood in the Council's Local Plan so that it is consistent with the draft London Plan.</p> <p>Tall buildings are appropriate in any location subject to the site context. The London Plan policy 7.7 states that tall buildings should <u>generally</u> be limited to opportunity areas, areas of intensification or town centres with good access to public transport. The draft London Plan policy D8 refers to the need to consider local context; the visual, functional, environmental and cumulative impacts of tall buildings; their potential contribution to new homes, economic growth and regeneration; and the public transport connectivity of different locations.</p> <p>The borough is anticipated to be subject to wide ranging public transport infrastructure improvements making a number of locations much more accessible (we note TfL's ongoing consultation for the Sutton link and Crossrail 2 for example). Taller buildings can accommodate a greater density of development and are appropriate where transport links make an area accessible.</p> <p>The policy should be suitably worded to be closer in alignment to the London Plan to allow the potential for sustainable development as set out at paragraph eight of the NPPF. We suggest first sentence of part f) be replaced with the following:</p> <p><i>"Proposals for tall buildings will generally be permitted only in areas with good access to public transport, town centres, areas of opportunity or intensification, or in areas where the site context is such that the provision of taller buildings does not impact adversely on the townscape".</i></p>
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Site allocations

South Wimbledon Policy N3.5

Clarion welcomes the ambition to recognise South Wimbledon as a distinctive neighbourhood in its own right, and supports the proposals for a new Local Centre around the underground station. The regeneration of High Path is an important factor in achieving this, with the outline planning permission securing over 9,000 sqm of commercial and community floorspace.

Clarion also welcomes the Council's intention that new development proposals should:

"have regard to the proposed regeneration at High Path as well as this plan, to ensure that South Wimbledon is developed as a cohesive, attractive and legible neighbourhood. Before designing new schemes, potential applicants for schemes within the vicinity of the High Path estate are advised to refer to the High Path section



of Merton's adopted Estates Local Plan 2018 and to contact the applicants of the outline planning application 17/P1721 (Clarion Housing Group) to ensure co-ordination of site designs, uses, materials and movement" (para. 3.5.11, Local Plan 2020)

South Wimbledon Station – Site Wi8

Clarion support the principle of a residential / mixed use development on the station site, and agree that a key planning consideration will be the relationship between any forthcoming proposals with the regeneration of High Path which has secured a resolution to grant outline planning permission. Clarion has already been in discussion with TfL regarding development around and above the tube station and looks forward to progressing these discussions in 2019.

Benedict Wharf – Site Mi1

Clarion supports the allocation for residential use. This site lies close to the Cherry Tree and Phipps Bridge estates where Clarion currently own and/or manage 269 and 382 homes respectively. The existing waste facility is not compatible with the existing land uses in the area, and improvements around the tram station would be beneficial to our residents on the nearby Cherry Tree, Phipps Bridge and Ravensbury Estates and improve the vitality and viability of the nearby Mitcham town centre.

United Westminster Schools – Site Mi14

This site lies nearby to the Eastfields estate which forms part of Clarion's ongoing estate regeneration programme.

Clarion supports the allocation of this site for a residential use where this enables publically accessible sports facilities alongside new homes. This site has long been inaccessible to the general public and its allocation represents an opportunity to provide new publicly accessible open space, new homes and associated facilities.

Mi1 and Mi14 as Catalysts of Wider Sustainable Development

Clarion believes the case for both the Mi1 and Mi14 sites is further strengthened where it can be demonstrated their development adds value to the wider improvement and regeneration of Mitcham. Clarion have identified both sites as offering the potential to speed up and enhance regeneration already underway or planned in the area. This linking of both sites to the delivery of socioeconomic and housing delivery benefits beyond the boundaries of the sites themselves reflects their importance and potential in the London Borough of Merton's longer term sustainable development ambitions and aspirations. There is scope to reflect that importance in policy.

Clarion looks forward to working closely with the Council to deliver new homes and communities within the borough. It welcomes the ambition of the draft Local Plan in this regard, however, further policy support is requested in relation to opportunities for refurbishment, intensification and regeneration of other housing. We ask that the Council continues to engage with Clarion in its consultations.

We would be grateful for confirmation that this letter of representation has been received. Should you have any questions regarding its contents please do not hesitate to contact myself or Samruti Patel at these offices.

Yours faithfully,

Savills