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**Future Merton
London Borough of Merton**



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Dear Sir / Madam,

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

Clarion Housing Group owns and manages around 10,000 homes in the London Borough Merton (LBM), and is one of the Council's preferred Registered Providers of affordable housing. Clarion supports the strategic aims of the draft new Local Plan to deliver: sustainable growth, opportunities and benefits for residents, affordable homes, jobs and other facilities needed to support growth; whilst continuing to preserve and creating attractive places to live, work and visit.

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 investment with a view to delivering greater sustainability benefits, new homes, employment and training opportunities and enhanced community infrastructure for their residents and the wider Merton community.

As part of this, Clarion is already engaged in major investment programmes at High Path (in South Wimbledon), Eastfields and Ravensbury (in Mitcham) where £1bn is to be invested. Under the first phase of works at Ravensbury in summer 2020, 21 new homes were handed over to the existing residents, providing better quality homes and alleviate overcrowding. Construction is also underway for 134 new homes at High Path with completion of these anticipated in 2022. Outline planning permission for the regeneration of these two estates, and Eastfields, has already been secured by Clarion, and as part of this over 2,700 new homes will be delivered in total, 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.

Clarions' work to continually improve and extend the life of existing housing stock, and improve the life chances of the existing and future communities continue over the 15 year Plan period. 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; and residents engagement will form a key part of this process. This programme of work 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 the following comments:



Policies

Objective / Policy	Clarion Comment
Good Growth Strategy	<p>Clarion are generally supportive of the Council's good growth strategy; however, we would comment on the following aspects of the strategy:</p> <ul style="list-style-type: none"> • The draft Plan should positively address the need to make the most effective use of land throughout its policies, noting the increasing housing need, as reflected in the latest housing need figures published by the Government in steering the delivery of new homes to urban areas. The figures published by the Government in December 2020, indicate a housing need figure for the LBM of 2,051 new homes per annum, which represents a significant uplift from the new London Plan target of 918 per annum. • Whilst through transitional arrangements, these increased housing need figures may not apply (subject to the timing of the draft Plan), given that the Secretary of State has directed the Mayor to start considering the next London Plan immediately, it is anticipated that LBM's targets will increase during the Plan period. Therefore it is extremely important that opportunities to optimise site capacity through a design-led approach are fully explored, in line with the Publication London Plan. In the context of the limited supply of brownfield land (which is recognised in the draft Plan), this is extremely important. • In line with Policy H1 of the Publication London Plan, support should be provided for the optimisation of housing delivery, especially from the sources of capacity listed in part 2) of Policy H1 – inclusive of sites with PTAL 3-6 or which are located within 800m of station or town centre boundary; housing intensification etc... • Opportunities to deliver better quality housing, and improvements to existing housing quality should also be supported across the borough, in the context of seeking to overcome the inequalities and deprivation recognised in the draft Plan. We acknowledge, and support, the Council's commitment to explore opportunities for estate regeneration in Mitcham, and reference to this being a long-term aspiration should be removed. The Plan covers a 15 year period, and as noted Clarion are working on 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 draft Plan period.
Urban Development Strategic Objective 1: supporting resilience	<p>Clarion supports this objective but suggests part a) could be added to as follows:</p> <p><i>"Providing for and supporting development proposals, including estate regeneration, for well-designed new homes, particularly affordable homes that meet the needs of existing and new households, including those on the council's waiting list".</i></p>

Urban Development Strategic Objective 5: places for people	Clarion welcomes the objective to provide new homes through physical regeneration, delivering higher density housing in places with good public transport access. To further support this objective, it is considered that reference should be made to exploring opportunities to improve existing homes and residential neighbourhoods.
Mitcham	<p>Clarion support the general objectives of Policy N3.2. However to be consistent with the Good Growth Strategy chapter, the Council should re-iterate that opportunities for estate regeneration will be explored in Mitcham.</p> <p>We also request the addition of the following between part j. and k. to reflect the regeneration of Eastfields and Ravensbury as part of the strategic draft Plan.</p> <p><i>"k. Supporting regeneration at Eastfields and Ravensbury to deliver better quality homes, to optimise the provision of new homes and to improve the neighbourhoods, in line with the Estates Local Plan."</i></p>
South Wimbledon	<p>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 new and improved commercial and community floorspace. We note that the Council is seeking comments on the boundary of the Local Centre. In this regard, as acknowledged by the early chapters of the draft Local Plan, the impacts of Covid-19 are not yet known; therefore, flexibility should be built into the policies to allow for the boundary to be re-assessed and re-considered during the Plan period. It is noted that the boundary extend along the estates' northern (along Merton High Street) and western boundary (along Morden Road). In light of Covid-19, in bringing forward the next phases of regeneration at High Path, Clarion will re-assess the type and quantum of commercial floorspace proposed to ensure that it will successfully contribute to the future Local Centre.</p> <p>Clarion also welcomes parts h. and j. of the policy but suggests the wording could be amended (as outlined below) to reflect the early principle outlined in the Good Growth Strategy chapter, and the fact that South Wimbledon is an identified growth area in the Publication London Plan and the Councils overall growth strategy for the draft Local Plan:</p> <p><i>"h. Support higher density development commensurate with the excellent public transport access of the area, by working with developers to explore design-led opportunities to make the most efficient and intensive use of land to optimise the development potential of sites and to deliver more homes"</i></p> <p><i>"j. Work with the regeneration phases being delivered on the High Path estate over the next 10-15 years, guided by the Estates Local Plan; this includes the consideration of higher density development, including tall buildings, and a proposed public park at High Path;"</i></p>

H4.1 – Housing Choice	<p>Clarion request the addition of a new point between part a and b.</p> <p><i>“Support proposals to improve the quality of existing homes.”</i></p> <p>Part d. Requires compliance with Building Regulations Requirement M4(2) and M4(3)</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 Publication London Plan, the Local Plan 2020 should recognise that in some circumstances this requirement would not be imposed.</p> <p>Part f. Setting out an affordable housing target of 50% for public sector land, and up to 50% for other land with a minimum provision of 40%. It also requires a tenure split of 70% for low cost rent and 30% for intermediate housing.</p> <p>Housing paragraph 4.2.8</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. The policy should however acknowledge the specific circumstances of estate regeneration schemes, to align with the policy considerations outline in the Publication London Plan.</p> <p>Clarion suggests the following wording..</p> <p><i>“For a decade Merton have been allocating sites of any size i.e. no minimum small sites threshold and has taken forward initiatives including town centre regeneration, estate regeneration and modular construction of affordable homes. Merton will continue to bring forward and support these initiatives”</i></p>
H4.2 - Housing Provision	<p>We will aim to deliver 13,263 additional homes for the period 2020/21 – 2034/35. This will be achieved by:</p> <ul style="list-style-type: none"> a. Working with housing providers to optimise housing; b. Supporting the provision of well-designed new homes...; c. Supporting the delivery of well-designed new homes on large and small sites ... which optimise levels of residential density... d. Supporting the redevelopment of poor quality existing housing that does not result in a net loss of residential units, or net loss of affordable housing units or residential land or net loss resulting from the change of use of any <p>Clarion support the Councils aspirations to increase the delivery of homes. However, the delivery should be expressed as a minimum target given the pressing need for housing in the borough, and wider London region.</p> <p>Clarion support the Councils intention to work with housing providers to optimise housing delivery; to create socially mixed and sustainable neighbourhoods; and to optimise residential density taking a design-led approach.</p> <p>Clarion welcome the Councils support for the redevelopment of poor quality existing housing and the aspiration of the policy to preserve the number of residential units / affordable housing units. However, assessing the potential loss of accommodation on a unit basis is not consistent with the Publication London Plan and Mayor of London Supplementary Planning Guidance documents on Housing (2016),</p>

	<p>type of housing to temporary sleeping accommodation on a permanent basis;</p> <p>D5.1 – Tall buildings Proposals for tall buildings will be permitted only within town centres in Colliers Wood, Morden and Wimbledon....</p>	<p>and Affordable Homes and Viability (2017). As such, the policy should be amended to refer to habitable rooms or floorspace.</p> <p>The wording of this policy limits the opportunity for development within the borough, and is not consistent with the Estates Local Plan (2018) which will remain part of the Local Plan. Furthermore, based on the information on the Councils website, it appears that no up to date evidence has been produced to inform this policy.</p> <p>Within the ELP, policies for High Path and Eastfields state that “<i>Taller buildings may be considered appropriate to facilitate intensified use of the site...</i>” The potential for taller buildings in regeneration proposals such as these should therefore be recognised, in facilitating regeneration where justified through a design-led approach to optimise site potential, and townscape and visual assessment.</p> <p>With regards to South Wimbledon generally, given the quantum of new homes planned for this area and its identified potential for additional housing, commercial and employment growth, there is a strong case for it to be specifically referenced as a location suitable for tall buildings. There are taller buildings already located in South Wimbledon, and taller buildings have been approved as part of the High Path regeneration. Indeed, although dated, the Tall Buildings Background Paper (2010) also recognised High Path as an area where tall buildings could be explored as part of a masterplanning exercise.</p> <p>The Publication London Plan policy D9 – Tall Buildings – says that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements the plan. This process should involve a consideration of the areas identified for growth. The spatial strategy for the borough, as outlined in early chapters of the draft Local Plan identifies South Wimbledon as one of the growth areas in the borough, and opportunities for growth are also identified in other parts of the borough including around the town centres, for example Mitcham. In the absence of any up-to-date evidence on tall buildings, the policy should recognise the potential for tall buildings in the growth areas more generally.</p> <p>The Publication London Plan policy D9 also 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>As outlined within the Publication London Plan, tall buildings can also be important in facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth,</p>
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particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can also help people navigate through an area by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can also make a positive contribution to townscape, and many tall buildings have become a valued part of London's identity.

Taking account of the above, the policy wording should be amended accordingly to:

- to include South Wimbledon as a location suitable for tall buildings;
- recognise the acceptability of taller buildings at High Path and Eastfields, in line with the Estate Local Plan; and
- to acknowledge the role that appropriately located tall buildings can play in facilitating regeneration in the growth areas, in managing future growth and in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.

We suggest the tall buildings policy be amended as follow:

"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 result in unacceptable visual, functional, environmental or cumulative impacts (in line with Publication London Plan Policy D9). The Council will support tall building proposals that are sized and appropriately located taking account of the following criteria".

- i. within Wimbledon town centre, as set out in the FutureWimbledon supplementary planning document,
 - ii. within Morden, as set out within the Morden town centre policy and site allocation (Mo4)
 - iii. within Colliers Wood, as set out within the site allocation CW2
 - iv. as part of the High Path regeneration, in accordance with the Estates Local Plan, as part of the Eastfields regeneration, in accordance with the Estates Local Plan...
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Add: *"In assessing development proposals for tall buildings, the Council will have regard to the role that appropriately located tall buildings can play in facilitating regeneration, in managing future growth and in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities."*

The new Local Plan will set out policies for development in the borough for the next 15 years and, in this context, the policy should be flexible



	enough so as to not limit opportunities to facilitate regeneration and to make the best use of limited land in the borough.
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Clarion looks forward to working closely with the Council to deliver new homes and sustainable neighbourhoods within the borough. It welcomes the ambition of the draft Local Plan in this regard, however, it is respectfully asked that consideration be given to the comments raised above with a view to supporting opportunities to improve the quality of existing housing, to deliver new homes (including affordable housing) and to facilitating regeneration opportunities to make the best use of the limited land resources in the borough. 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