



Future Merton
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Dear Sir / Madam

MERTON LOCAL PLAN REVIEW: REGULATION 18

Thank you for allowing the Home Builders Federation (HBF) to comment on Merton's Local Plan Review Regulation 18 consultation.

The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Last year, private sector housebuilders were responsible for building 43% of all affordable homes.

Relationship to the Replacement London Plan

The critical question is the relationship of the new emerging Merton Local Plan to the Replacement London Plan. We assume, but it is not altogether clear from the supporting consultation papers, that it is the intention of the Council to prepare the new Merton Local Plan that will be broadly in conformity with the Replacement London Plan - assuming that is that the latter Plan will be declared sound (albeit the Mayor can choose to ignore the Planning Inspectorate's verdict on some or all matters).

We note in the housing growth and infrastructure paper that Merton is consulting on the new housing figure contained in the Replacement London Plan – the figure of 1,328 dwellings per annum (dpa). It is sensible that the Council does so, since if the London Plan is found sound, this is the figure that Merton will be expected to plan for and begin to deliver once the London Plan is adopted and subsequently for the ten year period 2019/20 to 2028/29 (sic – this is actually nine years and is an issue that needs to be clarified).

It would be helpful if the Council explained which London Plan housing target it is currently adhering to. We assume it is the target in the current London Plan, which is

411 dpa. The Council should provide information on how it is performing against this target.

We acknowledge the challenging nature of this target. In terms of the options floated by the Council to accommodate this figure (question 1) the Council should embrace all of these options.

The option to allow homes to be built that are smaller than the Nationally Described Space Standard which is current London Plan policy, would be in danger of being at odds with the London Plan, but the Council does have the option of not conforming with all London Plan policies if justified by local circumstances. If it wishes to dis-apply the London Plan policy the Council should have regard to the *Planning Practice Guidance* that deals with the optional technical standards to support its case. The adoption of the Nationally Described Space Standard requires planning authorities to have regard to the need for the standard – i.e. whether the majority of homes that have been built recently are smaller than the national standard; its effect on land supply; its effect on housing affordability; and its effect on viability.

Small sites

To facilitate the development of more small sites, in line with policy H2 of the replacement London Plan, the Council should prepare a policy that reflects this and it should operate a presumption in favour of the residential development of small sites (that is sites involving developments of one to 25 dwellings).

As recommended by the emerging London Plan, the Council should prepare a design code for (policy H2, B2) that provides clear guidelines for small housing developments. This is very important. This should provide applicants with the confidence that schemes that conform to this design code will not be refused planning permission by the Council on design grounds.

Planning for older people

The Council should also prepare a positively worded planning policy for inclusion in the new Merton Local Plan that supports the provision of homes for older people. The current London Plan and the new London Plan include indicative targets for the number of older persons' housing that should be provided each year. The council should include this older persons' housing target in its local plan and have a positively worded policy that says that a 'presumption in favour of older peoples' housing will operate where the target has been missed in any previous year.

Planning for services and facilities to support our growing economy

The priorities for planning gain (s106 and CIL) in London are affordable housing and contributions to improving public transport networks. This is the policy of the current London Plan (policy 8.2 D) and remains the case with the new emerging London Plan. The emerging London Plan expects developers to provide a minimum of 35% affordable housing on all developments, and 50% on public owned land. The Council should have regard to these minimum targets when undertaking its local plan viability assessment.

Yours faithfully

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