Dear Sir / Madam

Draft Estates Local Plan Consultation
Representations made on behalf of Circle Housing Merton Priory

Further to the issue of the ‘Draft Estates Local Plan Stage 2 Consultation (1st February 2016 – 18th March 2016) we write to make formal representations to the consultation on behalf of Circle Housing Merton Priory (CHMP). CHMP is the majority land owner and will be delivering the regeneration of the Estates.

The Council transferred its housing stock to CHMP in 2010, which under the agreement CHMP was required to upgrade all homes to Decent Homes Standards. In pursuing this it has become clear that this does not present the most appropriate solution for investing in the sites and as such CHMP has been exploring options for the regeneration of the existing High Path, Eastfields and Ravensbury Estates, the subject of this draft Estates Local Plan. Accordingly, CHMP has undertaken extensive analysis of housing need, stock condition, the sites and their surrounding context, which has informed this response to the consultation.

CHMP welcomes the Council’s support for regeneration and intensification of the land use set out in the draft Estates Local Plan. It is noted that the draft Strategic Environmental Assessment (SEA) which underpins the Plan does not consider the three options for the Estates, being complete regeneration, enhanced refurbishment and Decent Homes Standard refurbishment. The SEA needs to fully consider the alternatives to regeneration and discount them.

Following a thorough review of the draft Estates Local Plan, we have a number of key concerns that we identify and discuss in the following sections. In addition to this letter we enclose a schedule of detailed comments which highlight issues with specific policies, text and diagrams and provides suggestions for amendments to the draft Development Plan Document (DPD).

The key concerns identified by CHMP, Savills and the design team are summarised as follows:

1) The draft Estates Local Plan will form part of the development plan and as such it is important to emphasise that any planning application must have regard to the whole development plan, including the London Plan (2015), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. This is an important legislative context that should be included within the DPD.

2) The draft DPD does not set the context in terms of housing need and delivery. We feel this is an important consideration that should be added.

3) Each of the sites are large enough to create their own character and therefore, the level of prescriptiveness in the policies is considered to be unnecessary. Flexibility should therefore be built...
in to the policies to allow each masterplan to develop through a design-led process having regard to creating their own character, whilst being respectful of the surrounding context and amenities where it is necessary.

4) The DPD is not considered to read consistently as a whole at present as there are conflicts between the draft policies, particularly in relation to the expected density of residential accommodation which would be heavily constrained by the building heights policies.

5) The policies are considered too prescriptive and there is limited flexibility built into the policy wording to allow an appropriate design led scheme to develop having regard to the site specific circumstances of the Estates and other material considerations.

6) High Path is within an Area of Intensification (as set out in The London Plan 2015) which is not acknowledged within the draft Estates Local Plan.

7) There are inaccuracies and errors within the existing analysis which should be amended to ensure policies are based on correct and consistent analysis.

8) A second round of consultation on the draft DPD may not be required and the inclusion of this would have a significant impact on the timescales for delivery of the regeneration.

We expand further on these concerns below.

Development Plan

The draft Estates Local Plan will form part of the development plan and as such it is important to emphasise within the DPD, that any planning application must have regard to the whole development plan, including the London Plan (2015), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, unless material considerations indicate otherwise. This is an important legislative context that should be included within the DPD.

Housing Need and Delivery

A section on Housing Need and Delivery should be included within the ‘Key Drivers’ Section set out in Chapter 2 of the draft Estates Local Plan. The Evidence Base for each estate includes a Housing Needs Assessment, and housing need is of national, regional and local importance as set out in prevailing planning policies. It is therefore important that housing need is identified as a key driver for the Estates Local Plan.

The NPPF, at paragraph 47, requires local authorities to significantly boost the supply of housing and using their evidence base should plan for the full objectively assessed needs for market and affordable housing, and identify strategic sites which are critical to the delivery of the housing strategy. The London Plan recognises the pressing, and desperate, need for more homes in London and therefore sets average annual minimum housing supply targets for each borough until 2025 (which are also expected to be exceeded by local authorities). A minimum annual housing target of 49,000 new homes per year is set for London, with Merton required to deliver a minimum 1,194 new homes per year. This is significantly higher than that envisaged within the Merton Core Strategy (minimum of 4,800 between 2011 to 2026) and as such there is a requirement for the Council to meet a higher identified housing need and therefore optimise the housing potential of these sites. At paragraph 3.19, the Mayor further recognises that the housing supply targets are set “...as minima, augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply”. The supporting text goes on to recognise that intensification areas and other large sites could provide a significant increase to housing supply.

In addition to highlighting the housing need of the Borough as per the above, a summary of the Housing Needs Assessment for each Estate should be included, particularly as this forms part of the evidence base for the Estates Local Plan.
**Large Sites**

The London Plan Policy 3.7 identifies that large sites (measuring 5ha or more) are able to create their own distinct character and support higher densities. This is further supported within the GLA Housing SPG paragraph 1.3.35 which refers to sites over 2ha being a large site and therefore able to create their own character and define their own setting. Notwithstanding this, it is recognised that development proposals should integrate with the wider area, however, as each of the estates are large sites, the policies should provide flexibility for the development proposals to create their own distinct character. Eastfields and High Path are large sites as defined by London Plan Policy 3.7 and all three sites are large sites as defined in the Housing SPG. It is therefore appropriate for this to be recognised and referred to throughout the DPD.

**Conflict Between Policies**

There are a number of examples of conflict between policies within the draft Estates Local Plan which we highlight in the following paragraphs and within the Comments Schedule.

The design teams have undertaken a detailed analysis of applying the height restrictions set out in the draft DPD on each site and the resultant impact on housing delivery and scheme viability. The draft height restrictions are considered to be too prescriptive and this will impact on the ability to optimise the potential of each site. It is therefore recommended that the height restrictions are made more flexible to allow a design-led process to optimising housing potential on the Estates.

At High Path, there is concern in relation to the blanket height range of 5 to 6 storeys that is being applied across the site, as this will impact on the level of accommodation that can be delivered, particularly as this is a ‘large site’ capable of creating its own character and also because of its location within an Area of Intensification. PRP Architects has undertaken an analysis that applying the proposed building heights would result in the delivery of significantly less units than the 1,802 that the DPD anticipates could be delivered. This would be contrary to paragraph 3.173 of the draft DPD which confirms that the Council is seeking higher densities on the Estates.

A similar analysis of the application of policies on Eastfields and Ravensbury has been undertaken by the design teams, and in both cases, the fixed height restrictions and other draft policy requirements will suppress the quantum of housing that can be delivered such that it will impact on the ability to optimise housing delivery and such that it will impact on scheme viability. The deliverability of the regenerations will be compromised as a result and this is a significant concern for CHMP. As noted, these are both large sites capable of creating their own character; therefore, fixed height restrictions are not considered appropriate.

The draft policies in relation to building heights at Eastfields (page 72 of the DPD) and Ravensbury (page 166 of the DPD) refer to scale of vegetation and views of trees as being the driver for the consideration of height. Further, the policy reference to scale of vegetation is open to interpretation and therefore it is not clear whether height above the trees will be acceptable. It is not appropriate that the Council considers trees to be the only driver for determining building heights having regard to London Plan Policies 7.4 (Local Character) and 7.7 (Architecture). The Council also recognises that there are other factors affecting the design of development at Policy DM D2 of the Sites and Policies DPD, which states that proposals should “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”. Taking this into account, it is suggested that reference to the scale of vegetation and views is removed.

The NPPF at paragraph 173 supports the consideration of viability in plan-making stating that “Plans should be deliverable”. As such it is considered appropriate that the policies are amended to allow the height of buildings, and other design parameters, to be informed by an urban design analysis to ensure that housing delivery is optimised and a viable design solution for the estate regeneration is realised.
Prescriptive Policies

Paragraph 2.4 of the draft DPD introduces the plan as a 'wholly design-led' document and is stated as being 'pitched at a high level, with detailed scheme proposals determined by the Council at the planning application stage should regeneration go ahead'. This general approach is supported but this approach has not been followed through in the policies and supporting text of the draft Plan.

The overall tone of the draft DPD is overly prescriptive particularly as this is implied by the Council at paragraph 2.4 as being a framework document. Furthermore, as set out already, any planning application for the regeneration of the Estates would have to be determined in accordance with the whole development plan, and not just the policies within the Estates Local Plan. The Estates Local Plan should not therefore be applied mechanistically to regeneration proposals at the application stage, and this should be made clear within the wording of the DPD.

Flexibility should also be introduced into the document, in line with the suggestions in the enclosed Comments Schedule, to ensure that the regeneration proposals can offer viable sustainable solutions that provide the opportunity for genuine place-making. As already noted, these are all large sites capable of creating their own character; therefore, the DPD should provide the flexibility required to allow this. Paragraph 59 of the NPPF, states that 'design policies should avoid unnecessary prescription or detail'. The Planning Practice Guidance (PPG) (ref: 12-010-20140306) also states that Local Plans “...should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability.” Further, given that the regeneration of the Estates will be delivered over a number of years it is considered entirely appropriate that flexibility should be built in to the DPD to allow development proposals to respond to changing circumstances in order to create successful places. This approach would be entirely consistent with the NPPF and the PPG.

Intensification Areas

Policy 2.13 of the London Plan identifies South Wimbledon / Colliers Wood as an Intensification Area. High Path is within this Intensification Area and this should be acknowledged within the Estates Local Plan. Further, it should also be recognised that London Plan Policy 3.7 encourages higher densities in Intensification Areas.

Existing Analysis

There are a number of inconsistencies in the existing analysis of the Estates, which are identified within the Comments Schedule. It is important that the existing analysis is accurate and reflects the existing situation. This is reinforced at paragraph 158 of the NPPF which requires that the Local Plan is based on “...adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area”.

Timeline

Having regard to local plan preparation requirements, the second consultation on the draft document may not be necessary. There is no requirement under the Town and Country Planning (Local Planning) (England) Regulations 2012 that a second round of consultation on the draft Local Plan is undertaken. A second consultation would impact the programme for the DPD which would have subsequent impact on the submission of the regeneration outline applications. Of significant consequence would be the impact on the early delivery of housing for which there is an identified need (at national, regional and local level). This would be at odds with DCLG’s political priority for early housing delivery through estate regeneration and as such the requirement of a second consultation should be carefully assessed.

St Marks Academy

CHMP support that the Council has identified an opportunity for potential redevelopment at the St Marks Academy site. Should this additional site come forward it will enhance the regeneration of the area, with
potential to provide a kickstart site for additional housing at Eastfields. This will assist in decant needs, enabling regeneration to come forward earlier and enabling the regeneration to be completed within a shorter timeframe. CHMP are engaging with the Academy regarding this opportunity and will keep the Council updated on these discussions. It is important that this opportunity is reflected within the DPD, with flexibility to allow the site to come forward, but that it does not delay the DPD adoption process.

Summary

CHMP welcome the Council’s support for the regeneration and intensification of the three Estates. There are however a number of concerns with the draft DPD, highlighted above and within the enclosed Comments Schedule. CHMP welcomes the opportunity to discuss these concerns with the Council in order to ensure flexibility within the policies can be achieved. It is also important to reinforce the importance of a short programme for the adoption of the DPD to support the early housing delivery through a design led, sustainable and viable regeneration solution for the Estates.

CHMP reserve the right to submit additional representations to those set out, having regard to the detailed planning, design, technical and viability analysis that they are undertaking as part of the preparation of the masterplans for the three estates.

Should you have any queries please do not hesitate to contact me or my colleague Catherine Bruce on 020 3320 8286 / cbruce@savills.com. We look forward to receiving convenient dates to meet to discuss the evolving DPD.

Yours faithfully

pp. Jane Barnett
Director

Enc. Comments Schedule 18/03/2016
A section needs to be added in Chapter 2 defining housing need as a key driver.

The proposed strategies included in the DPD, for example, limit use and height diagrams are not considered to be necessary and are overly prescriptive. Should the local authority continue to include these diagrams it needs to be stated clear that there are indicative diagrams and not a way to be strictly applied.

The need for a framework to be used for future update and delivery. For example, it would not be possible to incorporate higher densities into the local plan for several years due to the time required for development of the Estates Local Plan.

The DPD should acknowledge throughout that the Estates are large enough to define their own setting, and reflect the status of the Estates as ‘large sites’ which resultantly can define their own setting. In particular, Housing SPG 1.3.35 states that ‘Typically, sites over two hectares usually have the potential to deliver their own setting’. It is acknowledged that the sites must integrate and improve the areas functionally but that they can create their own different and distant character as a result of their size. These sites can additionally accommodate higher densities. This is supported within the London Plan at Policy 2.13 which refers to large sites (over 5 hectares) and that these should be ‘progressed through an appropriately plan-led process to encourage higher densities’. As a result of their size, these sites can additionally accommodate higher densities. This is supported within the London Plan at Policy 2.13 which refers to large sites (over 5 hectares) and that these should be ‘progressed through an appropriately plan-led process to encourage higher densities’. 

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2.18 A Sustainability Appraisal (SA) of each option identifies strategic environmental implications for plan management, development and implementation. The SA has been undertaken in the preparation of the Draft Estates Local Plan and has been submitted in accordance with the requirements of paragraph 173 of the NPPF. The SA should include a site assessment, integration with local plans, and provide opportunities and constraints for the sustainable development of the estate.

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2.19 When undertaking a Sustainability Appraisal it should be noted that the NPPF acknowledges that SA will not be necessary for every policy or plan. However, SA will be necessary if the plan or policy has a significant effect on the environment, or if it will be beneficial for the plan or policy to have a SA.

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2.20 Planning applications that accord with the policies in this Local Plan will be given a presumption in favour of being approved unless it can be demonstrated that the application is contrary to the interests of either the estate or the wider community.

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2.21 All development in the vicinity of the Estate should be planned in a manner that maintains and enhances the local community, improves living standards, and creates good environments.
Creating an east-west link will help to integrate the estate into the water area. This could be achieved by creating a clearly visible east-west thorough street between Tamworth Lane and Woodstock Way by fully connecting up Acacia Road, Fleet Road and Eastfield Avenue. The creation of a clearly visible north-south thorough street between Grove Road, through the estate to the southern boundary will also help to integrate the estate into the water area. This connectivity will enable the area to overcome its isolated feeling and link to the area beyond.

Landmark buildings should be located around the focal points and gateways. A series of focal points could be created along Acacia Road through the masterplanning process and should not be limited to a single focal point. The Design PPG comments that ‘Successful places can adapt to changing circumstances and demands. They are flexible and able to respond to a range of future needs’. Therefore, the DPD should not insist on laying every prescription and incorporate flexibility to allow focal points to develop through a design-led approach through the masterplanning process.

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This replicates Merton Development Management Policies and as such is not necessary to repeat in the Estates Local Plan.

The streets meeting the southern boundary with the site would probably be designed to the form of a culvert which would be utilised for a range of uses including retaining walls and flood prevention.

The proposed development must aim to reduce post development surf ace areas of any storey heights should be determined by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of the landscape or skyline.

It is not considered appropriate to describe the site as suburban given this is a large site that can create its own character whilst integrating with the surrounding area.

As above.

The DPR should therefore be worded to allow flexibility in the landscape and urban design which will be informed through a design-led approach to the masterplanning process.

The streets should be designed to ensure a mix of varied building heights. This existing layout presents something of a fortress feel from the outside, but a strong sense of calm enclosure from the inside. This height and isolated vegetation contribute to achieving consistency with the surrounding character.

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views along the whole length of the
east-west link is not possible if existing roads and utilities are to remain unaltered; and potential for
future-proofing layouts to accommodate and balance a locally appropriate mix of movement and place-based activities.

Merton High Street and Merantun Way. Landmark buildings should also be considered within the estate and not limited to the periphery. As the site is defined as a large site in accordance with the London Plan and Housing SPG it is of size that
suitable locations for landmark buildings. Other suitable locations could be the junction of High Path and Morden Road and the junction of Abbey Road and Mertantun Way.

The key points into the estate at either end of Pincott Road and Nelson Grove Road are the most
suitable locations for landmark buildings. Nelson Grove Road provides the key east-west route into the estate, and the junction of Abbey Road and Nelson Grove Road. This policy requires greater flexibility and is considered to be too prescriptive, contrary to the NPPF (Para 59) which states that
It is appropriate for flexibility to be provided in the design of off-street parking to allow this to develop through a design-led approach informed by highways and urban design analysis.

Extension of Nelson Grove Road from Abbey Road in the east to Morden Road in the west will help provide an east to west link, with clear views along its whole length. The Council's aspiration is to improve the public realm on Morden Road and Merantun Way by creating a better balance between vehicles and pedestrians. Specific improvements that could be made include:

- Creating a safer route between vehicles and pedestrians. Special improvements that could
influence pedestrian flows and enhance the general quality of the estate boundary, putting a focus on the pedestrian experience;

- Ensuring that any proposals do not detract from the pedestrian experience, particularly along Pincott Road and Nelson Grove Road;

- Providing a direct pedestrian route from Morden Road to the junction of Merantun Way and Abbey Road, enabling views to Merton Abbey Mills. Future links to the south of Merantun Way should be explored as this could would...

- Signalised junction. It would require all traffic to instead to route through the masterplan site, including school drop-off pick-up vehicle trips. Highways proposals will therefore be developed through consultation with the relevant highways authorities.

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Page 101, Diagram

Page 100, Policy EP H1 d)

Page 102, Policy EP H1 e)

Page 102, Policy EP H2 a)

Page 102, Policy EP H2 b)

Page 102, Policy EP H2 c)

Page 102, Policy EP H2 d)

Page 102, Policy EP H2 e)

Page 102, Policy EP H2 f)

Page 103, Stages

Page 103, Stages

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The proposed amendments should be consistent with London Plan Policy 5.10. Although parking is restricted along High Path Road, located congestion frequently occurs during peak times. To improve traffic flows, it is proposed that all car parking be located in undercroft spaces at basement level. The proposed parking layout is to be flexible to accommodate anticipated demand and to be located under the site. In accordance with the London Plan and the Local Plan the residential development should improve the urban design quality of the site.

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The general building height across the site should be 6-8 storeys with variations provided, to create a consistent and coherent character that works well with the existing buildings.

Buildings fronting Morden Road should be 3-6 storeys in height to reflect the scale of the existing housing and ensure a consistent and coherent street character.

Buildings on the west side of Abbey Road should be up to 4 storeys to relate well to the existing housing on the east side and street flats on the west side.

Building height along High Path should be 3-4 storeys in height to reflect its historic character

The estate is located in an area of intensification and is large enough to create a unique extension to our town centre.

It is not considered appropriate to refer to buildings reflecting the scale of the mature trees and spaces.

At four storeys Ravensbury Court both reflects the scale of the mature trees and spaces and is an essential part of its character.

Locally the existing boundary fronting Morden Way is suitable for buildings of 7-9 storeys to promote the transformation of this road into a boulevard street.

Building heights along High Path should be 3-4 storeys in height to reflect the character of the estate.

It is clear that the houses from the main road are likely to be removed during re-development. The existing Morden Way and Merton High Street are critical in ensuring that the estate fits well with the surroundings.

A more even distribution of heights will reduce these negative characteristics and help new development fit in comfortably with its surroundings. It will also create neighbourhood streets that are easy to get around. In order to fit well with the surroundings, it is important to ensure building heights on the east side and west side are consistent and coherent.

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Areas of approximately 6.5 hectares. It is therefore large enough to create its own character. The estate is located in an area of intensification and is large enough to create its own character.

Some of the space is well defined and its use and purpose clear, with little space being 'left over' or ambiguous.

The landscape of the estate is defined by the surrounding natural features of Morden High Park and the riparian landscape of the River Wandle. This gives the estate a recognizable and coherent character.

The estate is located in an area of intensification and is large enough to create its own character with varied building heights.

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This is a suburban area not 'semi rural' and as such the reference should be removed.

Reinstatement of a historic river channel running alongside Morden Road. Proposals should therefore be encouraged to create a new link between the Ravensbury Estate and Ravensbury Park, providing clear views along its whole length.

To enhance pedestrian links there is also opportunity to build a new bridge to Ravensbury Park, creating a new North-South pedestrian link from Wandle Road to the Ravensbury Estate. Within Ravensbury Park there is potential to add additional bridges/walkways across the one and back channel which would allow for a better connection between the Ravensbury Estate and Ravensbury Park.

The Council should update the DPD Regulation 133.1(d) to enable CIL receipts to be used to fund the delivery of such infrastructure as it is not only for the benefit of the Estate, nor is the provision a site specific mitigation requirement.

The Council should update the CIL Regulation 133.1(d) to enable CIL receipts to be used to fund the delivery of any potential off-site infrastructure, such as any potential off-site enhancements.

We are of the view that the site has the potential to accommodate higher densities as set out in Policy T.7 of the London Plan. Where this is the case the DPD should then be updated to reflect this, ensuring that sufficient guidance is provided on how this is to be achieved.

A. Ravensbury Grove, through landscaping, should utilise sustainable urban drainage systems (SUDS) unless there are ecological reasons for not doing so, and should aim to achieve greenfield rates as close to reasonably possible.

B. Ravensbury Grove, through landscaping, should ensure pedestrian and cyclist have sufficient space to move in a comfortable environment. The Council should update the CIL Regulation 133.1(d) to enable CIL receipts to be used to fund the delivery of such infrastructure as it is not only for the benefit of the Estate, nor is the provision a site specific mitigation requirement.

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The DPD should refrain from being overly prescriptive. Paragraph 59 of the NPPF states that design codes should avoid unnecessary prescription or detail. This is reiterated within the Design PDG which provides guidance on creating successful places. The Design PDG notes that successful places can adapt to changing circumstances and demands. They are flexible and able to respond to future needs.

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The opportunity should also reflect the position that the Estates are ‘large sites’ and therefore have the potential to accommodate higher densities as set out in Policy T.7 of the London Plan. Where this is the case the DPD should then be updated to reflect this, ensuring that sufficient guidance is provided on how this is to be achieved.

The Council should update the DPD Regulation 133.1(d) to enable CIL receipts to be used to fund the delivery of such infrastructure as it is not only for the benefit of the Estate, nor is the provision a site specific mitigation requirement.

The proposal should be extended fully to the boundary of the Ravensbury Estate. There is potential to add additional bridges/roadways across the one and back channel which would allow for a better connection between the Ravensbury Estate and Ravensbury Park.

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Running the potential loss and housing subject is not referenced as an opportunity and it should be included in this section. The opportunity should also reflect the position that the Estates are ‘large sites’ and therefore have the potential to accommodate higher densities as set out in Policy T.7 of the London Plan. Where this is the case the DPD should then be updated to reflect this, ensuring that sufficient guidance is provided on how this is to be achieved.
It is important to recognise the importance of early delivery housing for the decant of residents. Viability information in support of the case for regeneration and future planning applications will be redacted where appropriate due to the inclusion of commercially sensitive information.

New development comprising mainly of houses rather than flats is more likely to preserve the landscape character of the estate.

Building new homes for existing residents to move into while their home is being built is very important for keeping existing communities together and gives support to the principle of recovering vacant homes for an existing population. Hence policies should be designed to ensure support for this practice. In addition, planning guidance will be included on how these subjects will be expected to be addressed.

The need for a design code should be determined through pre-application discussions rather than the DPD. Therefore, housing types should be driven by housing need and viability as identified in the Housing Needs Assessment. Additionally, it should be acknowledged that flatted blocks and maisonettes can be appropriately designed to preserve landscape character.

DESIGN CODE

The next chapter outlines the requirements applicants will need to meet in their submission of planning applications. This will include a set of detailed design codes, developed by the applicant, to ensure the delivery of key infrastructure and to mitigate impact of development. The Council will use section 106 planning obligations and/or CIL to ensure the delivery of items identified in the DPD, as such infrastructure is not only for the benefit of an Estate, nor the NPPF paragraph 59 states that "Local Planning Authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail...". Therefore, housing types should be driven by housing need and viability as identified in the Housing Needs Assessment. Additionally, it should be acknowledged that flatted blocks and maisonettes can be appropriately designed to preserve landscape character.