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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 (1<sup>st</sup> February 2016 – 18<sup>th</sup> 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 surpass 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](mailto:cbruce@savills.com). We look forward to receiving convenient dates to meet to discuss the evolving DPD.

Yours faithfully

A handwritten signature in black ink, appearing to be the initials 'CB' followed by a stylized flourish.

pp. Jane Barnett  
Director

Enc. Comments Schedule 18/03/2016

**Estates Local Plan Consultation:  
Comment Schedule 18 March 2016**



Page, Para Reference	DPD text	Suggested Change	Justification / Comments
<b>GENERAL COMMENTS</b>			
General		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'. Having regard to this, the overall tone of the draft DPD is considered to be overly prescriptive particularly as this is a framework document. Flexibility should be introduced into the document and policies, in line with the suggestions below, to ensure that designs can offer viable sustainable solutions that provide the opportunity for genuine place-making.	<p>Policies should refrain from being overly prescriptive in accordance with paragraph 59 of the NPPF, which states that 'design policies should avoid unnecessary prescription or detail'. The 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."</p> <p>Flexibility in Local Plans is reiterated within the Design section of Planning Practice Guidance (PPG) which notes that 'successful places can adapt to changing circumstances and demands. They are flexible and able to respond to future needs'. Given that the regeneration will take place over a number of years it is entirely appropriate to ensure flexibility is built into the DPD.</p> <p>Paragraph 173 of the NPPF states that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking'. An appreciation and details of viability, and the financial implications of plan policies should therefore run throughout the DPD.</p>
General - Chapter 2	A housing section is required within the DPD to set context perhaps at the introduction sections.	A section needs to be added in Chapter 2 defining housing need as a key driver.	Please see cover letter for further justification.
General Comment		The proposed diagrams included within the DPD, for example, land use and heights diagrams are not considered to be necessary and are overly prescriptive. Should the local authority continue to include these diagrams it needs to be made clear that these are indicative diagrams and not in any way to be strictly applied.	The evidence base for the diagrams should be made available as "appropriate and proportionate evidence is essential for producing a sound Local Plan" (PPG ref: 12-014-20140306) and the "evidence needs to inform what is in the plan..." Further as set out at para 158 of the NPPF "Each local planning authority should ensure 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".
General		Include reference to Intensification Area throughout the development where relevant. <b>High Path is identified as being within the South Wimbledon / Colliers Wood Intensification Area as defined at Map 2.4 and Policy 2.13 of The London Plan (2015).</b>	<p>Page 79 of the London Plan provides a list of Opportunity and Intensification Areas. South Wimbledon / Colliers Wood (Number 44 on this list) is highlighted as being an Area of Intensification. High Path is within the Area of Intensification. Policy 2.13 of the London Plan provides the policy framework behind Intensification Areas which includes the requirement to 'provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential in terms of Annex 1, recognising that there are different models for carrying these forward'.</p> <p>Annex 1 in regards to the South Wimbledon/Colliers Wood Intensification Area states that the 'location contains a range of major opportunities for intensification including South Wimbledon and Colliers Wood' with a minimum number of new homes set at 1,300. Policy 2.13 goes on to state that development proposals should 'contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1...'</p>
General		The DPD should acknowledge throughout that the Estates are large enough to define their own setting, character and density.	<p>The DPD needs to reflect the status of the Estates as 'large sites' which resultanty can define their own setting. In particular, Housing SPG 1.3.35 states that 'Typically, sites over two hectares usually have the potential to define their own setting'. It is acknowledged that the sites must integrate and improve the area functionally but that they can create their own different and distinct character.</p> <p>As a result of their size, these sites can additionally accommodate higher densities. This is supported within the London Plan at Policy 3.7 which refers to large sites (over 5 hectares) and that these should be 'progressed through an appropriately plan-led process to encourage higher densities'.</p> <p>Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.</p>
General		Alter reference from 'Local Plan' to 'Estates Local Plan' throughout the whole document	There are other Development Plan Documents that comprise the Council's Local Plan. Any planning application must be determined in accordance with the development plan as a whole, including the London Plan, Core Strategy and Sites and Policies DPD, in accordance with S38(6) of the Planning and Compulsory Purchase Act 2004.
12, 2.3	"Should regeneration go ahead this Estates Local Plan will be an essential part in shaping redevelopment process..."	"Should regeneration go ahead this Estates Local Plan will be an essential part in <del>provide a framework</del> for shaping the redevelopment process..."	This statement is too prescriptive on the role of the Estates Local Plan. The NPPF (Para 59) states that 'design policies should avoid unnecessary prescription or detail' and goes on to comment that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles' (Para 60). This is further supported by the Design PPG noting that 'to promote speed of implementation, avoiding stifling responsible innovation and provide flexibility, design codes should wherever possible avoid overly prescriptive detail and encourage sense of place and variety'.
15, 2.9	The objectives at paragraph 2.9 are not listed in an order consistent with the NPPF	<b>To make Merton a well connected place where walking, cycling and public transport are the modes of choice when planning all journeys. • To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space. • To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively. • To promote social cohesion and tackle deprivation by reducing inequalities. • To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space. • To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough. • To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place. • To make Merton a healthier and better place for people to live, work in or visit.</b>	This should be re-ordered in line with the NPPF priorities.

15, 2.10 and 2.11	<p>2.10 A Sustainability Appraisal (SA) which incorporates a Strategic Environmental Assessment (SEA) has been undertaken in the preparation of the Draft Estates Local Plan and has assisted in the shaping of the document. The purpose of SA/SEA is to promote sustainable development by integrating social, economic and environmental considerations into the preparation of the new Local Plan.</p> <p>2.11 The SA/SEA is also an important tool for developing sound planning policies which are consistent with the government's sustainable development agenda and achieving the aspirations of local communities.</p>	<p>2.10 A Sustainability Appraisal (SA) which incorporates a Strategic Environmental Assessment (SEA) has been undertaken in the preparation of the Draft Estates Local Plan and has assisted in the shaping of the document. The purpose of SA/SEA is to promote sustainable development by integrating economic, social, economic and environmental considerations into the preparation of the new Local Plan.</p> <p>2.11 The SA/SEA is also an important a tool for developing sound planning policies which are consistent with the government's sustainable development agenda and achieving the aspirations of local communities.</p>	<p>Paragraph 2.10 should be reordered in line with the NPPF priorities. Delete reference to SA as an "important" tool, as it is part of a suite of tools for developing planning policies.</p>
18, 2.22	<p>Planning applications that accord with the policies in this Local Plan...</p>	<p>Planning applications that accord with the policies in <del>this Local Plan</del> the Development Plan...</p>	<p>Planning applications should accord with the development plan unless material considerations state otherwise in accordance with S38(6) of the Planning and Compulsory Purchase Act 2004.</p>
18, 2.23	<p>...to achieve the optimal balance of positive social, environmental and economic outcomes....</p>	<p>...to achieve the optimal balance of positive economic, social and environmental and economic outcomes....</p>	<p>To re-order social, environmental and economic references in line with NPPF priorities.</p>
18, 2.24	<p>An assessment of Merton's Site and Policies DPD has been conducted...</p>	<p>This paragraph should be revisited as it is unclear whether reference should be made to the Sites and Policies DPD at this stage in the DPD.</p>	<p>Review and update for clarity.</p>
20		<p>A summary of the Case for Regeneration for each of the Estates should be included as a key driver.</p>	<p>This should include a short statement taken from Savills Case for Regeneration, as this is identified one of the Key Drivers on page 17. The summary should also refer to meeting the housing need of the estates, whilst also contributing to the wider Borough minimum targets set by The London Plan (Table 3.1).</p>
20, 2.25	<p>CHMP have undertaken technical surveys and financial planning work...</p>	<p>CHMP have undertaken technical impact assessments, surveys and financial planning work...</p>	<p>CHMP have undertaken a substantial number of technical impact assessments that support their emerging proposals for the Estates and these should therefore be referenced.</p>
20, 2.28	<p>It is the council's view, supported by CHMP's evidence that whilst incremental refurbishment and decent homes works would improve the internal housing quality in the short to long term...</p>	<p>Add a sentence at the end of paragraph 2.28 as follows: <b>Incremental refurbishment is a short term fix that will not be sufficient to meet longer term housing needs and results in comprehensive regeneration proposals being economically unviable for CHMP as the delivery partner.</b></p>	<p>This policy should include more emphasis on the fact that a "short term fix" will not be sufficient to meet the longer term housing needs of the Estate and will not be economically viable for Circle Housing as the delivery partner. Additionally paragraph 173 of the NPPF states that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking'.</p>
p23	<p>High Path red line plan</p>	<p>Amended red line plan to be included (as per the enclosed) to ensure Nos. 68A and B are included, as well as all relevant portions of the footpath and public realm.</p>	<p>Please see attached correct red line plan boundary (Attachment 1)</p>
p24	<p>Ravensbury red line plan</p>	<p>Amended red line plan to be included (as per the enclosed).</p>	<p>Please see attached correct red line plan boundary (Attachment 2)</p>
26, 2.33	<p>"The creation of sustainable, well designed safe neighbourhoods with good quality new homes, that maintain and enhance the local community, improve living standards and create good environments."</p>	<p>"The creation of sustainable, well designed safe neighbourhoods with good quality new homes, that maintain and enhance the local community, improve living standards and create good environments through viable regeneration"</p>	<p>An appreciation and details of viability and the financial implications of plan policies should run throughout the DPD. Paragraph 173 of the NPPF states that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking'.</p>
Page 26, 2.34	<p>The creation of a new neighbourhood with traditional streets and improved links to its surroundings, that supports the existing local economy. Buildings will be of a consistent design, form and character, using land efficiently to make the most of good transport services and create a distinctly urban character based on the "New London Vernacular" of traditional terraced streets, front doors to streets, use of brick and good internal design and access to quality amenity space.</p>	<p>The creation of a new vibrant neighbourhood with improved links to its surroundings, that supports the existing local economy while drawing on the surrounding area's diverse heritage and strong sense of community. Buildings will be of a consistent design quality, form and character, using land efficiently to make the most of good transport services and create a distinctly urban character based on "New-London-Vernacular- of traditional streets, front doors to streets, use of predominantly brick, homes with good internal design and access to quality amenity space.</p>	<p>NPPF Para 60. comments that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness'. Consequently, committing to one type of architecture may be too prescriptive. The New London Vernacular can take a variety of forms and works very successfully, but over the lifespan of the DPD and regeneration which is anticipated to be 10 years, this could result in a lack of place making. The vision should be balanced between aspiring and future proofing the development.</p>
28, 2.37	<p>New development must be designed to have buildings with entrances and windows facing the street...and no blank walls or gable ends.</p>	<p>New development must be designed to have buildings with entrances and windows facing the street...and no should avoid blank walls or gable ends unless justified by detailed design analysis</p>	<p>The NPPF Para 59 directs against applying unnecessary prescription or detail within design policies. Reference should be made to avoiding blank walls and gable ends wherever possible as it may be unavoidable on some occasions.</p>
28, 2.38	<p>Irregular building lines and building heights undermine this and should therefore be avoided.</p>	<p>Irregular building lines and building heights undermine this and should therefore be avoided unless justified by detailed design analysis</p>	<p>As above.</p>
28, 2.39	<p>All private, communal and public amenity space must be of a high quality of design, attractive, useable, fit for purpose and meet all policy requirements, including addressing issues of appropriate facilities, replacement space or identified shortfall.</p>	<p>All private, communal and public amenity space must be of a high quality of design, attractive, useable, fit for purpose and meet all policy requirements, including addressing issues of appropriate facilities, replacement space or identified shortfall unless justified by amenity and open space analysis</p>	<p>It is not always appropriate to meet "all policy requirements" and these will need to be balanced with other planning issues and benefits which should be considered on balance. Section 38(6) of the Planning and Compulsory Purchase Act allows for deviations from development plan policy where material considerations justify such an approach.</p>
p29, 2.43	<p>New development should be sustainable in terms of supporting local social and economic development to support community development, making use of sustainable travel modes the first choice, encouraging community based car sharing schemes and facilitating improved health and well-being such as enabling local food growing and are encouraged to implement aims set out by the Merton Food Charter.</p>	<p>New development should be sustainable in terms of supporting local social and economic development to support community development, for example by making use of sustainable travel modes the first choice, encouraging community based car sharing schemes and facilitating improved health and well-being such as enabling local food growing and are encouraged to implement aims set out by the Merton Food Charter.</p>	<p>The NPPF requires Local Plans to be prepared with the objective of contributing to the achievement of sustainable development (para 151) and that 'Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three' (Para 152). As such full consideration will need to be given to the potential community development provision through the masterplan preparation process and as such the DPD should not be prescriptive on what the potential provision should be.</p>
29, 2.45	<p>The London Plan density matrix should be applied in determining an appropriate density for each estate. Development that is too dense may result in cramped internal layouts, overlooking or daylight issues, or a high number of single (or nearly single) aspect dwellings. Development that is not dense enough will not use land efficiently and effectively or provide sufficient good quality homes.</p>	<p>This paragraph should be provided as the first Design Principle titled 'Optimising Density' and updated as follows: <b>Development proposals should optimise the potential of the land and housing output.</b> The London Plan density matrix should be applied in determining an appropriate density for each estate. Development that is too dense may result in cramped internal layouts, overlooking or daylight issues, or a high number of single (or nearly single) aspect dwellings. Development that is not dense enough will not use land efficiently and effectively or provide sufficient good quality homes. <b>Density should not be applied mechanically and development proposals should have regard to other material considerations such as accessibility, design and local context.</b></p>	<p>Optimising the potential of land and housing output is not referenced as a Design Principle and it should be included in this section. The DPD should also reflect the position that the Estates are 'large sites' and therefore that they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.</p> <p>Furthermore, the Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'.</p>
30, 2.47	<p>The design, layout and appearance of new development must take inspiration and ideas from the positive elements of the local built, natural and historic context. This must include an analysis of what local characteristics are relevant and why, and which are less so. Opportunity must be taken to strengthen local character by drawing on its positive characteristics.</p>	<p>The design, layout and appearance of new development should take inspiration and ideas from the positive elements of the local built, natural and historic context wherever relevant, unless justified by detailed design analysis. <del>This must include an analysis of what local characteristics are relevant and why, and which are less so.</del> The London Housing SPG notes that 'Typically, sites over two hectares usually have the potential to define their own setting.' The Estates are large enough to define their own setting, to deliver higher density development and to create their own characteristics. <del>Opportunities to create their own character should be taken. Opportunity must be taken to strengthen local character by drawing on its positive characteristics.</del></p>	<p>The DPD needs to reflect the status of the Estates as 'large sites' (as reflected in national policy) which resultantly can define their own setting. In particular, the Housing SPG 1.3.35 states that 'Typically, sites over two hectares usually have the potential to define their own setting'.</p> <p>As a result of their size, these sites can additionally accommodate higher densities. This is supported within the London plan which refers to large sites (over 5 hectares) and that these should be 'progressed through an appropriately plan-led process to encourage higher densities'.</p> <p>Additionally, opportunities to create and retain character of an area should be taken in line with NPPF Para 60 which states that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness'. This is supported by London Plan Policy 3.7 which notes that a plan-led process should encourage the creation of neighbourhoods with a 'distinct character'. Development proposals should integrate with the surrounding area but are large enough to create a different character.</p>

EASTFIELDS

44, 3.23	The estate itself is distinctive enough from its surroundings to form its own character	The estate itself is <b>large enough and</b> distinctive enough from its surroundings to form its own character	As above.
p48, 3.28	...Public Transport Accessibility Level (PTAL) score is low at only 2 which is defined as poor by the London Plan.	...Public Transport Accessibility Level (PTAL) score is <del>low at only 2 which is defined as poor</del> <b>varies across the site ranging from 1b to 3 which defined as very poor to moderate</b> by the London Plan.	The TIL PTAL plan shows a varying PTAL rating across the site and this should be reflected in the description of the current PTAL rate.
50, 3.31	...and include <del>bib</del> stores and parking in the centre.	...and include <del>bib</del> <b>bin</b> stores and parking in the centre.	Typo
p55		Include housing optimisation as an opportunity.	Optimising the potential of land and housing output is not referenced as an opportunity and it should be included in this section. The opportunity should also reflect the position that the Estate is a 'large sites' and therefore has the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.
p56, 3.45	Creating an east-west link will help to integrate the estate into the wider area. This could be achieved by creating a clearly visible eastwest through street between Tamworth Lane and Woodstock Way by fully connecting up Acacia Road, Mulholland Close and Clay Avenue. The creation of a clearly visible north-south street from Grove Road, through the estate to the southern boundary will also help to integrate the estate into wider area. This connectivity will enable the site to overcome its isolated feel by linking it to the area beyond.	Creating an east-west link <del>will</del> <b>could</b> help to integrate the estate into the wider area. This could be achieved by creating a clearly visible eastwest through street between Tamworth Lane and Woodstock Way by fully connecting up Acacia Road, Mulholland Close and Clay Avenue. The creation of a clearly visible north-south street from Grove Road, through the estate to the southern boundary <del>will</del> <b>could</b> also help to integrate the estate into wider area. This connectivity will enable the site to overcome its isolated feel by linking it to the area beyond.	The feasibility of such links will need to be explored through the masterplanning process for the Estate.
56, 3.46	The focal point could be at the intersection of the north-south and east-west streets	<del>The focal point for the area should be along the northern east-west route of the site. A series of focal points of varying nature could be developed along Acacia Road, for example</del> at the intersection of the north-south and east-west streets.	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 are able to respond to a range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow focal points to develop through a design-led approach through the masterplanning process.
56, 3.47	Develop undesignated open spaces to allow for better distribution of functional open space throughout the estate. Retain existing established mature trees in the central green space. Make this, or a similar replacement(s) publicly accessible and a basis for the creation of new open space and potential local focal points, squares, communal gardens, food growing etc.	Develop undesignated open spaces to allow for better distribution of functional open space throughout the estate. Retain existing established mature trees in the central green space <del>unless justified by an arboricultural survey and urban design analysis</del> . Make this, or a similar replacement(s) publicly accessible and a basis for the creation of new open space and potential local focal points, squares, communal gardens, food growing etc.	Where possible existing trees will be retained on site; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible.
56, 3.48	Create visual connectivity to the generally attractive surroundings of the playground and cemetery and to make the BMX track less visually isolated. This could be achieved by retaining the mature trees surrounding the site, whilst thinning the smaller scrub and vegetation from between them, so opening out longer and wider views.	Create visual connectivity to the generally attractive surroundings of the playground and cemetery and to make the BMX track less visually isolated. This could be achieved by retaining the mature trees surrounding the site, whilst thinning the smaller scrub and vegetation from between them, so opening out longer and wider views. <b>Visual links to the south and east should focus primarily on long views across the green cemetery space. The galvanised cemetery boundary fence is unattractive. Buildings and landscape treatment should be used to minimise its barrier like impact on the public realm.</b>	Detailed urban design analysis and comments during public consultation have emphasised the importance of improving long views.
58,3.49	Landmark buildings should be located around the focal point at the intersection of the north-south and east-west streets.	Landmark buildings should be located around the <b>focal points and gateways</b> . <del>focal point at the intersection of the north-south and east-west streets.</del>	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 are able to respond to range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow landmark buildings to develop at appropriate focal points and gateways to develop as a result of the masterplanning process.
58, 3.50	Landmark buildings could be differentiated by appearance and to a degree by height; however, they should be designed to ensure that they are sensitive to the general character of the rest of the development.	Landmark buildings could be differentiated by appearance and to a degree by height; however, they should be designed to ensure that they are <del>sensitive to</del> <b>complementary</b> to the general character of the rest of the development.	The site or the surrounding area is not identified as a heritage asset and as such the use of the word 'sensitive' is not appropriate. The London Plan simply states in Policy 7.4 that 'Development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings'.
p58, Policy EP E1 c)	EP E1 Townscape a) Proposals should demonstrate a well defined building line fronting onto the combined East-West street. Buildings should provide continuity and enclosure along the route ensuring buildings address the street. b) This frontage should not present a fortress-like wall between the street and the estate beyond. Therefore this frontage should be broken at intervals by streets into the estate. c) Proposals should create a focal point in the estate. The most suitable location for this is at the intersection of the north-south and east-west streets. d) The massing and layout of proposals should enable visual connectivity from within the estate to the attractive surroundings of the playground and cemetery.	EP E1 Townscape a) Proposals should demonstrate a well defined building line fronting onto the combined East-West street. Buildings should provide continuity and enclosure along the route ensuring buildings address the street. b) This frontage should not present a fortress-like wall between the street and the estate beyond. Therefore this frontage should be broken at intervals by streets into the estate. <del>c) Proposals should create a focal point in the estate. The most suitable location for this is at the intersection of the north-south and east-west streets. Proposals should create focal points in the estate. The most suitable location for these are at key junctions and at gateways into the Estate.</del> d) The massing and layout of proposals should enable visual connectivity from within the estate to the attractive surroundings of the playground and cemetery.	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 are able to respond to range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow focal points to develop as a result of the masterplanning process.
64, Policy EP E4	The land use for the estate will remain residential with open space ....	The land use for the estate will remain <b>predominantly</b> residential with open space ....	London Plan Policy 3.7 on large scale residential developments supports the incorporation of non-residential uses stating that 'Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility'.
p64, 3.68	Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate such as business space or local retail facilities, these could be located at the focal point where the north-south and east-west streets intersect.	Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate such as business space or local retail facilities, these could be located <del>at the focal point where the north-south and east-west streets intersect</del> <b>at the focal points and gateways</b> .	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 are able to respond to range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow focal points to develop through a design-led approach.
64, 3.69	Eastfields is located within an area with a low Public Transport Accessibility Level and a suburban character. Taking account of these factors, and the existing number of homes, and application of the London Plan Matrix a range of 464 -644 (gross figure) new homes are anticipated on site.	Eastfields is <b>currently</b> located within an area with a <b>low to moderate</b> Public Transport Accessibility Level and a suburban character. Taking account of these factors, and the existing number of homes, and application of the London Plan Matrix a range of 464 -644 (gross figure) new homes are anticipated on site. <b>This density range should not be applied mechanically and a design-led approach should be taken.</b>	The DPD should also reflect the position that the Estates are 'large sites' and therefore they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'. Furthermore, the Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'. As such it is appropriate to add this to para 3.69.
p65	Diagram E4	Diagram to be deleted.	This diagram is unnecessary and should be removed.

p66, EP E5 Policy A	Equivalent or better re-provision of the area of designated open space at the boundary with the cemetery in terms of quantity and quality to a suitable location within the estate, with high quality landscaping and recreational uses.	Equivalent or better re-provision of the area of designated open space at the boundary with the cemetery in terms of quantity and quality to a suitable location within the estate, with high quality landscaping and recreational uses. <b>Any shortfall in quantity will only be acceptable where this is robustly justified.</b>	CHMP's assessment of the existing site has identified that some of the open space to the boundaries of the site is unusable and of a poor quality. As such it is appropriate that the policy focuses on improving the quality of open space with any shortfall to be robustly justified.
66, Policy EP E5 Policy C	As there are groups of large mature trees in the existing main open space, any new open space should incorporate these trees into it as key landscape feature	As there are groups of large mature trees in the existing main open space, any new open space should incorporate these trees into it as key landscape feature, <b>unless their loss can be justified by arboricultural or urban design analysis.</b>	Where possible existing trees will be retained and incorporated into the regeneration; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken by CHMP which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible having regard to the findings of the arboricultural survey.
p66, EP E5 Policy D	All new houses should have gardens that meet or exceed current space standards.	<del>All new houses should have gardens that meet or exceed current space standards.</del>	This replicates Merton Development Management Policies and as such is not necessary to repeat in the Estates Local Plan.
p66, 3.72	The streets meeting the southern boundary with the cemetery should preferably do so in the form of pocket parks that can be utilised for a range of uses including allotments and food growing.	The streets meeting the southern boundary with the cemetery <del>should preferably do so in</del> <b>could be in</b> the form of pocket parks that can be utilised for a range of uses including allotments and food growing.	The DPD 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.
p68, EP E6 Policy B	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible...	<del>The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates...</del>	The proposed amended wording should be consistent with London Plan Policy 5.13.
p68, 3.81	Reference to a culverted ditch	<del>Reference to a culverted ditch</del>	CHMP have undertaken physical surveys of the site which do not show the presence of this culverted ditch. If this reference is to be included please provide the evidence base for the existence of the ditch.
p70, Policy EP E7 Policy G	These trees should be retained and be used to inform the design of landscape arrangements for example to provide cues for the location of focal points.	<del>These trees should be retained</del> <b>Existing trees of value should be retained unless justified by an arboricultural survey and urban design analysis</b> and be used to inform the design of landscape arrangements for example to provide cues for the location of focal points.	The proposed amended wording would be consistent with Policy 7.21 of the London Plan. Trees will be retained where possible and any potential removal will be based on robust arboricultural and urban design analysis.
71, Diagram E7		Reduce extent of scrub removal on the southern boundary to only locations adjacent to the pocket parks.	The design intent is to maximise long views across the cemetery and tree canopies. If the diagram is to be retained the removal of scrub along the southern boundary should be based on an analysis of the existing boundary condition and consideration should be given to views expressed during public consultation which supported retention.
p72, EP E8	a) The majority of buildings across the estate should not extend higher than 2-4 storeys to contribute to achieving consistency with the surrounding character. b) A number of taller buildings are considered appropriate in landscape and townscape terms and to facilitate intensified use of the site. The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of this vegetation. c) When viewed from outside the estate, taller buildings should not be seen to dominate the landscape or skyline.	Insert before point a) the following: <b>"The Estate is large enough to create its own character with a variety of building heights which should be informed by a detailed character analysis, with consideration given to the below</b> a) The majority of buildings across the estate <del>should not extend higher than</del> <b>could range from 2 –4-6</b> storeys to contribute to achieving consistency with the surrounding character. b) A number of taller buildings are considered appropriate in landscape and townscape terms and to facilitate intensified use of the site. The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of this vegetation. c) When viewed from outside the estate, taller buildings should not be seen to dominate the landscape or skyline.	The NPPF supports proposals which raise the standard of design more generally in an area and this should be recognised. The London Plan Policy 3.7 also supports a plan-led process should encourage the creation of neighbourhoods with a <i>'distinct character'</i> . Furthermore, London Plan Policy 7.6 requires that buildings should have regard to (not necessarily be consistent with) the scale, mass and orientation of surrounding buildings. As such it is considered appropriate that development proposals should have regard to surrounding buildings; however it is also appropriate for taller buildings to be provided where justified by robust character and townscape analysis.
72, EP E8	b) The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of the vegetation	<del>b) The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of the vegetation</del> <b>be informed by a detailed character and townscape visual impact analysis, including impact on local views.</b>	The London Plan Policy 7.4 states that <i>'Development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings'</i> . Policy 7.4 requires development proposals to contribute to a positive relationship between the urban structure and natural landscape, but not that building heights should be determined by existing trees. It is therefore inappropriate that building heights should be determined on existing tree height. Furthermore, CHMP has undertaken an assessment of the impact of restricting buildings to existing tree heights and it would have a significant impact on the delivery of a higher density scheme as required by other policies in the Estates Local Plan.
72 3.90	The existing estate has a consistently uniform height of three storey buildings with flat roofs, that gives the estate its distinctive character. This presents something of a fortress feel from the outside, but a strong sense of calm enclosure from the inside. This height and isolated location mean the estate is not a dominant form in the wider townscape.	The existing estate has a consistently uniform height of three storey buildings with flat roofs, that gives the estate its distinctive character; <b>however the estate is large enough to create its own character with varied building heights.</b> 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 location mean the estate is not a dominant form in the wider townscape.	As above.
72 3.91	Development proposals will need to demonstrate careful consideration of proposed building heights in relation to internal open space and views into the estate from the wider area, across the cemetery and any other longer vantage points. A clear strategy on building heights will be needed to ensure the suburban character of the area is not unduly compromised.	Development proposals will need to demonstrate careful consideration of proposed building heights in relation to internal open space and views into the estate from the wider area, across the cemetery and any other longer vantage points. A clear strategy on building heights will be needed to ensure the suburban character of the area is not unduly compromised.	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.
<b>HIGH PATH</b>			
76, 3.92	High Path falls within South Wimbledon/Colliers Wood Intensification Area, where the London Plan encourages optimisation of residential densities.	Include reference to Intensification Area throughout the development where relevant. <b>High Path is identified as being within the South Wimbledon / Colliers Wood Intensification Area as defined at Map 2.4 and Policy 2.13 of The London Plan (2015).</b>	Page 79 of the London Plan provides a list of Opportunity and Intensification Areas. South Wimbledon / Colliers Wood (Number 44 on this list) is highlighted as being an Area of Intensification. High Path is within the Area of Intensification. Policy 2.13 of the London Plan provides the policy framework behind Intensification Areas which includes the requirement to <i>'provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential in terms of Annex 1, recognising that there are different models for carrying these forward'</i> . Annex 1 in regards to the South Wimbledon/Colliers Wood Intensification Area states that the <i>'location contains a range of major opportunities for intensification including South Wimbledon and Colliers Wood'</i> with a minimum number of new homes set at 1,300. Policy 2.13 goes on to state that development proposals should <i>'contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1...'</i>
86, 3.118	Public transport links are excellent with the area having a PTAL Level of 5.	Public transport links are excellent with the area having a PTAL Level <b>rating of 5. Improvement works will result in a PTAL rating of 5-6a by 2021.</b>	Housing SPG Policy 3.15 highlights that Boroughs should combine both the short and medium term vision with long term policies and should therefore take account of the proposed improvement works to public transport.
Page 88, 3.120	Commercial buildings along Merton High Street may seem a bit higher than 3 storeys due to their generous ceiling heights'  This is probably the most appropriate location for taller buildings in the area	<del>Commercial buildings along Merton High Street may seem a bit higher than 3 storeys due to their generous ceiling heights.</del> <b>There is a mixture of 3 and 4 storey buildings along Merton High Street. Some of the 3 storey buildings appear slightly higher than 3 storeys due to generous ceiling heights and extended parapets</b> <del>This is probably the most appropriate location for taller buildings in the area</del>	Accuracy on the description of heights is required.
p90	The Key refers to 'Incidental green space'	The Key refers to <del>'Incidental green space'</del> <b>'Leftover spaces'</b>	These leftover spaces have no merit and therefore it is not considered appropriate to describe them as incidental green space

98, Opportunities	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 are simplifying the junction of High Path, The Path and Morden Road and creating an attractive entrance and enabling views to Merton Abbey Mills. Future links to the south of Merantun Way should be planned for as well as east-west quiet-ways for cyclists and pedestrians.	Include housing optimisation as an opportunity.  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 are simplifying the junction of High Path, The Path and Morden Road and creating an attractive entrance and enabling views to Merton Abbey Mills. Future links to the south of Merantun Way should be planned for as well as east-west quiet-ways for cyclists and pedestrians, <b>subject to the findings of utilities and transport surveys.</b>	The DPD needs to reflect the status of the Estates as 'large sites' (as reflected in national policy) 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 define their own setting', and therefore their scale means they have particular potential to define their own characteristics and accommodate higher density development.  CHMP has undertaken a number of technical surveys on existing utilities and as such it should be noted that these must be taken into account in developing highways and public realm improvements.
Page 100, Policy EP H1 c)	Streets should be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove Road	Streets should be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove Road	Planning Policy Guidance on Design notes that 'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities'.  There are design and existing utilities constraints which will impact on the ability to provide a straight street through the site. This is however considered to be an appropriate design response, as staggered streets create character and can reduce vehicular speeding.
Page 100, Policy EP H1 d)	The key points into the estate at either end of Pincott Road and Nelson Grove Road are the most 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 Merantun 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. Other suitable locations could be the junction of High Path and Morden Road and the junction of Abbey Road and Merantun Way. <b>Landmark buildings can also be delivered within the estate, where this can be justified in townscape and visual impact terms.</b>	This policy wording only considers place-making on the periphery of the estate and does not consider place-making through the use of landmark buildings within the estate.  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 it can create its own character.
Page 101	Diagram	If the diagram is retained it should be updated as follows and taking account of the comments above: Move building line back along western edge of the High Street; the straight line view along entire east-west link is not possible if existing roads and utilities are to remain/be enhanced; and potential for landmark buildings within the site.	Building lines on western part of Merton High Street do not take into account of the existing Category A London Plane trees.
Page 102, Policy EP H2 a)	Nelson Grove Road and Pincott Road, provide appropriate basis for the design of the new street network and should form the basis of the main routes into and out of the estate. 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.	Nelson Grove Road and Pincott Road, provide appropriate basis for the design of the new street network and should form the basis of the main routes into and out of the estate. 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 towards Morden Road, will help provide a safe cycle and pedestrian link across the estate.	Planning Policy Guidance on Design notes that 'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities'.  Removing High Path junction and providing a junction from Nelson Grove Road onto Morden Road may have traffic impact and movement issues, including being too close to the Merton High Street signalised junction. It would require all traffic to instead 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.
Page 102, 3.149	North-south streets between Pincott Road and Abbey Road, linking Merton High Street and Nelson Grove Road. These new streets would help connect the new neighbourhood effectively with the existing grid pattern layout and also ensure efficient block pattern layout.	North-south streets ( <b>not necessarily vehicular through routes</b> ) between Pincott Road and Abbey Road, linking Merton High Street and Nelson Grove Road. These new streets would help connect the new neighbourhood effectively with the existing grid pattern layout and also ensure efficient block pattern layout.	The provision of vehicular access will depend on traffic flows and traffic modelling which would be assessed through a Transport Assessment. As such it should be made specific that through routes could be for pedestrians only.  Reference should also be made to the viability of this proposal. The NPPF Para 173 states that 'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. Therefore, it should be noted that the inclusion of pedestrian access would lead to the loss of around 18 homes.  Concern is also raised in regards to the safety of the proposed back entrance to Merton High Street and how this would work with the proposed plans for the new tram. London plan Policy 7.3 states that 'Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being over bearing or intimidating'. Consequently, concern is raised in regards to a lack of frontage without train station improvements which could create an unsafe space.
p102, 3.150	Layouts should be designed to allow for pedestrian access...	<b>Consideration should be given to futureproofing layouts to should be designed to allow for pedestrian access having regard to placemaking considerations...</b>	This policy requires greater flexibility and is considered to be too prescriptive, contrary to the NPPF (Para 59) which states that 'design policies should avoid unnecessary prescription or detail'. The proposals should develop through the design-led masterplanning process.
p102,3.152	Whilst Rodney Place, is outside the estate boundary, linking it into the street pattern of the estate would help improve links within the area and make it easier to get around.	Whilst Rodney Place is outside the estate boundary, linking it into the street pattern of the estate <b>should be explored as this could</b> help improve links within the area and make it easier to get around.	This is not currently part of the Estates regeneration proposals and should be more flexible in allowing this to be explored further.
Page 103	Diagram	If the diagram is to be retained, it should reflect the comments made above and be amended as follows: horizontal orange line 'Nelson Grove Road (required historic street alignments)' should be amended and the blue arrow indicating potential access along Morden Road should be specified as a potential access and not necessarily for vehicles.	Planning Policy Guidance on Design notes that 'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities'.  If the historic line of Nelson Grove Road is retained to the western side of the estate there may be costly and unnecessary diversions of major utilities underneath Rowland Way. The NPPF Para 173 states that 'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. As such flexibility should be retained for the highways and access strategy for the site.
104 3.157	Off-street parking should preferably be provided instead of undercrofts at basement level, rather than ground level parking with communal garden podiums above.	<b>Off-street parking should preferably be provided instead of undercrofts at basement level, rather than ground level parking with communal garden podiums above. Where off-street parking is proposed detailed design consideration should be given to the impact on street frontages, landscaping and quality of residential accommodation.</b>	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.
p104, 3.160	From the south the main access point at the junction of Station Road and Merantun Way, where traffic movement is restricted to left in and left out only.	From the south the main access point at the junction of High Path and Merantun Way, where traffic movements <b>are left and right into High Path, but restricted to left out only from High Path.</b>	Currently you can turn right from Merantun Way into High Path and this should be updated for accuracy.

p105, 3.165	Although parking is restricted along High Path Road, localised congestion frequently occurs during school peak times. To improve cycle access it may prove necessary to further restrict vehicle movements by closing the western end of High Path to vehicle traffic, although careful consideration of the impacts on the school and alternative traffic routes will need to be fully understood. How any changes interact with outline plans for the South Wimbledon Tram extension will also need to be identified.	Although parking is restricted along High Path Road, localised congestion frequently occurs during school peak times. To improve cycle access it may prove necessary to further restrict vehicle movements by closing the western end of High Path to vehicle traffic, although careful consideration of the <b>highway impacts</b> , impacts on the school and alternative traffic routes will need to be fully understood. How any changes interact with outline plans for the South Wimbledon Tram extension will also need to be identified.	Highways impacts of the regeneration proposals will be considered at the outline planning application stage and will be assessed by a Transport Assessment. As such this should be specified in the policy as being integral to considering whether restricting vehicle movements would be appropriate.
p105, 3.169	For off-street facilities the preference for parking to be provided in full undercrofts at basement level avoids the creation of residential units with windows only located on one side of the building (single aspect) at ground level that are difficult to design well internally and restrict the type of residential units that are possible.	<del>For off-street facilities the preference for parking to be provided in full undercrofts at basement level avoids the creation of residential units with windows only located on one side of the building (single aspect) at ground level that are difficult to design well internally and restrict the type of residential units that are possible.</del>	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.
p106	Diagram	If the diagram is to be retained, arrow along Nelson Grove Road showing vehicular route connecting to Morden Road should be removed.	Considering the points above this should be removed as it may not be technically possible and could have significant highways implications which would be contrary to para.32 of the NPPF which requires development proposals not to have a severe impact on highways.
p108, EP H4	a) The primary land use for the site will be residential, to accord with the predominant land use of the existing site and surrounding area. b) Development proposals must make more efficient use of the land by building in accordance with the London Plan density matrix that are higher than current and improving the urban design quality of the estate. c) In general, the residential density should be higher in the north-west corner of the site, gradually reducing towards the south-east, where the public transport accessibility (PTAL) is lower and there are smaller scale developments (e.g. Rodney Place) or more local streets (e.g. High Path).	a) The primary land use for the site will be residential, to accord with the predominant land use of the existing site and surrounding area. <b>Non-residential uses may be appropriate.</b> b) Development proposals must make more efficient use of the land <del>by building in accordance with</del> having regard to the London Plan density matrix <b>which indicates that densities higher than existing are acceptable.</b> Development proposals should improve <del>are higher than current and improving</del> the urban design quality of the estate. c) <del>In general, the residential density should be higher in the north-west corner of the site, gradually reducing towards the south-east, where the public transport accessibility (PTAL) is lower and there are smaller scale developments (e.g. Rodney Place) or more local streets (e.g. High Path).</del>	The DPD needs to reflect the status of the Estates as 'large sites' (as reflected in national policy) 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 define their own setting', and therefore their scale means they are able to define their own characteristics and accommodate higher density development. London Plan Policy 3.7 also supports the addition of non-residential uses on large sites.
108, 3.173	High Path and the surrounding area are predominately residential. High Path is located within an area with a good level of Public Transport Accessibility (PTAL). In accordance with the London Plan density matrix, regeneration offers opportunities to make more efficient use of the land with higher density development. Applying this matrix indicates and taking account of the existing number of homes, indicates a range of 608 - 1,802 (gross figure) new homes for this site and the council's expectation is for development proposals to be at the higher end of this range.	High Path and the surrounding area are predominately residential. High Path is located within an <b>urban</b> area with a good level of Public Transport Accessibility (PTAL). In accordance with the London Plan density matrix, regeneration offers opportunities to make more efficient use of the land with higher density development. Applying this matrix indicates and taking account of the existing number of homes, indicates a range of 608 - 1,802 (gross figure) new homes for this site and the council's expectation is for development proposals to be at the higher end of this range. <b>This density range should not be applied mechanically and a design-led approach should be taken.</b>	Optimising the potential of land and housing output is not referenced as a Design Principle and it should be included in this section. The DPD should also reflect the position that the Estates are 'large sites' and therefore that they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'. Furthermore, the Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'.
109, 3.175	Subject to meeting the Local Plan policies, provision of such uses (e.g. retail shops, financial and professional services, cafes/restaurants, replacement of public houses, community, health, leisure and entertainment uses)	Subject to meeting the Local Plan policies, provision of such uses (e.g. retail shops, financial and professional services, cafes/restaurants, replacement of public houses, <b>offices</b> , community, health, leisure and entertainment uses)	Offices could be an appropriate non-residential use on large sites in accordance with London Plan Policy 3.7.
Page 113	Diagram	If the diagram is to be retained reference to retained trees informing the design of open spaces should be removed.	CHMP has undertaken arboricultural surveys which indicates that some of the mature trees highlighted are not of value and should therefore not necessarily be a basis for the location of open spaces. The location of open spaces should be based on a detailed urban design analysis.
p114, Policy A	Retention of the existing mature tree groups and street trees including the trees fronting Merton High Street east of the junction with Pincott Rd are to form the basis of new open spaces and a network of biodiversity enhancing green corridors across the estate.	<del>the retention of</del> Retention of the existing mature tree groups <b>of value</b> and street trees <b>of value</b> including the trees fronting Merton High Street east of the junction with Pincott Rd are to form the basis of new open spaces and a network of biodiversity enhancing green corridors across the estate <b>unless justified by a detailed design analysis and arboricultural survey.</b>	Where possible existing trees will be retained on site; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible.
p114, Policy E	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible...	<del>The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates....</del>	The proposed amended wording should be consistent with London Plan Policy 5.13.
p114, P3.185	Reference to culverted watercourse across estate	Reference to culverted watercourse across estate	CHMP have undertaken physical surveys of the site which do not show the presence of this culverted ditch. If this reference is to be included please provide the evidence base for the existence of the ditch.
Page 116	Diagram	If the diagram is to be retained remove reference to mature trees informing the design of open spaces	CHMP has undertaken arboricultural surveys which indicates that some of the mature trees highlighted are not of value and should therefore not necessarily be a basis for the location of open spaces. The location of open spaces should be based on a detailed urban design analysis.
118, EP H7 Landscape	a) Retention of: i) the existing mature tree groups and street trees including the trees fronting Merton High Street east of the junction with Pincott Road; ii) the tree planting along Hayward Close should be continued along the whole length of the street to strengthen the attractive 'avenue' character of this street; iii) the mature tree(s) in the vicinity of the playground within the 'Priory Close' block; iv) the line of mature trees in the car park between the 'Ryder House' and Hudson Court' blocks; v) the mature trees in the playground to the north of the 'Marsh Court' block. vi) the mature trees to the west and south of the 'Merton Place' block, and to the north of the 'DeBurgh House' block.	a) <b>Where justified by arboricultural surveys and urban design analysis</b> , retention of: i) the existing mature tree groups <b>(if of value)</b> and street trees <b>(if of value)</b> including the trees fronting Merton High Street east <b>and west</b> of the junction with Pincott Road; ii) the trees <b>(if of value)</b> planting along Hayward Close should be continued along the whole length of the street to strengthen the attractive 'avenue' character of this street; iii) the mature tree(s) <b>(if of value)</b> in the vicinity of the playground within the 'Priory Close' block; iv) the line of mature trees <b>(if of value)</b> in the car park between the 'Ryder House' and Hudson Court' blocks; v) the mature trees <b>(if of value)</b> in the playground to the north of the 'Marsh Court' block. vi) the mature trees <b>(if of value)</b> to the west and south of the 'Merton Place' block, and to the north of the 'DeBurgh House' block.	Where possible existing trees will be retained on site; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible.

120, EP H8 Building Heights	<p>a) The general building height across the site should be 5-6 storeys with variations (outlined below) in order to create a consistent height profile and street character that visually links with the surroundings.</p> <p>b) Buildings fronting Merton High Street will be restricted to 4 storeys (with potential for a 5th storey setback) to ensure the environmental quality of the street does not unduly suffer from shading and blocking of sunlight.</p> <p>c) Buildings fronting Morden Road should be 7-9 storeys to be similar to the existing and potential building heights on its west side and ensure a consistent and even street character.</p> <p>d) 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 newer flats on the west side.</p> <p>e) Building heights along High Path should be 3-4 storeys in height to reflect its historic character as a narrow historic street and ensure that it sensitively takes account of the setting of St Johns the Divine Church.</p> <p>f) Land outside the estate boundary fronting Merantun Way is suitable for buildings of 7-9 storeys to promote the transformation of this road into a boulevard street.</p> <p>g) Where Station Road, Abbey Road and Merantun Way meet is a sensitive area as there are likely to be awkward shaped sites. The close proximity of Rodney Place and Merantun Way create a need to respect existing low-rise development and make the most of the potential for taller buildings fronting Merantun Way. Storey heights in this general area should rise from 3-4 storeys to 5-6 storeys.</p>	<p><b>The estate is located in an area of intensification and is large enough to create its own character with varied building heights including potentially tall buildings having regard to the considerations below.</b></p> <p><del>a) The general building height across the site should be 5-6 storeys with variations (outlined below) in order to create a consistent height profile and street character that visually links with the surroundings.</del></p> <p><del>b) Buildings fronting Merton High Street will be restricted to 4 storeys (with potential for a 5th storey setback) to ensure the environmental quality of the street does not unduly suffer from shading and blocking of sunlight.</del></p> <p><del>c) Buildings fronting Morden Road should be 7-9 storeys to be similar to the existing and potential building heights on its west side and ensure a consistent and even street character.</del></p> <p><del>d) 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 newer flats on the west side.</del></p> <p><del>e) Building heights along High Path should be 3-4 storeys in height to reflect its historic character as a narrow historic street and ensure that it sensitively takes account of the setting of St Johns the Divine Church.</del></p> <p><del>f) Land outside the estate boundary fronting Merantun Way is suitable for buildings of 7-9 storeys to promote the transformation of this road into a boulevard street.</del></p> <p><del>g) Where Station Road, Abbey Road and Merantun Way meet is a sensitive area as there are likely to be awkward shaped sites. The close proximity of Rodney Place and Merantun Way create a need to respect existing low-rise development and make the most of the potential for taller buildings fronting Merantun Way. Storey heights in this general area should rise from 3-4 storeys to 5-6 storeys.</del></p>	<p>In order to meet the higher end of the density range specified, greater flexibility is required to support the development of scheme that provides buildings of varying heights justified on townscape, visual and amenity terms. The site is considered to be a large site and can therefore form its own character in line with London Plan Policy 3.7.</p> <p>London Plan Policy 7.7 notes that 'Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.' The Estate is not within a sensitive area and consequently, subject to adequate assessments, heights along the street could be increased to generate the stimulus for redevelopment of the land to the south of High Path, adjacent to Merantun Way.</p>
p120, 3.199	Building heights along the lengths of streets should be similar or the same on either side in order to maintain a consistent character.	<del>Building heights along the lengths of streets should be similar or the same on either side in order to maintain a consistent character.</del>	<p>Opportunities to create and retain character of an area should be taken in line with NPPF Para 60 which states that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness'.</p> <p>Consequently, this policy is too prescriptive and no transition in height would ever occur if the same height was to be provided on either side of a street. The site is large enough to create its own character in accordance with Policy 3.7.</p>
p120, 3.200	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 edge of the estate relate appropriately to those adjacent to it.	A more even <b>appropriate</b> 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 edge of the estate relate appropriately to those adjacent to it.	The policy needs to be flexible to allow a design led approach to building heights, informed by detailed urban design and townscape analysis.
<b>RAVENSBURY ESTATE</b>			
p 124, 3.201	....area of approximately 4.5 hectares.	....area of approximately 4.5 hectares. <b>It is therefore large enough to create its own character.</b>	As per the Housing SPG it should be recognised that this is a large site which should 'create neighbourhoods with distinctive character'.
p.126-128		Due to the structure of the section it is unclear about the historical development of the site. The narrative jumps from 1800s, to 1930s, 1970 and then 1950. It would help if some re-ordering of the paragraphs was undertaken.	For clarity.
p.127, 3.208	Maps from the 1950s show a branch of the River running alongside Morden Road, which is clearly responsible for the set-back of the houses from the main road.	<del>Maps from the 1950s show a branch of the River</del> <b>one of the man-made watercourses</b> running alongside Morden Road <b>which is clearly responsible for the set-back of the houses from the main road with earlier maps from the 1930s showing watercourses running east to west through the site.</b>	There has been much emphasis placed on this one section of the many man-made watercourses that were created as part of the mill. The focus should not be placed singularly on this element as it is no more significant than all the other historic watercourses that were created on the site. It is therefore appropriate to make reference to all historic watercourses.
p.130	Image Plan	Ravensbury Estate (number 1 in the key) has included both Ravensbury Mill and the buildings on the opposite side of Morden Road. These should be removed from the estate area and included in the Ravensbury Park and Morden Hall Park areas respectively.	The character of the estate in both building type, street layout and defined building edge along Morden Road means that it is a separate character area that has a relationship to, but is not the same character as the adjacent buildings.
133, 3.223	Within the Estate the PTAL is 1B	Within the Estate the PTAL is 1B. <b>Improvements will result in a PTAL rating of 2-3 by 2021.</b>	Housing SPG Policy 3.15 highlights that Boroughs should combine both the short and medium term vision with long term policies and it is therefore appropriate to take account of the proposed transport improvement works.
P.134	Diagram	There are some Orlit houses along Ravensbury Grove which were built at the same time as the rest of the houses in Orange. There is photographic and mapped evidence that the two rows of original terraced houses on the estate were still standing when the Orlit houses were built and the plan should therefore be updated.	This should be updated for clarity and consistency. Please see attached plan as Attachment 3.
136, 3.225	At four storeys Ravensbury Court both reflects the scale of the mature trees and spaces surrounding it...	<del>At four storeys Ravensbury Court both reflects the scale of the mature trees and spaces surrounding it....</del>	It is not considered appropriate to refer to buildings reflecting the scale of trees.
136, Diagram		Communal amenity space should be shown behind the block of flats at the bottom of Ravensbury Grove Road.	For accuracy and clarity as this is existing space.
137, 3.226	Most of the space is well defined and its use and purpose clear, with little space being 'left over' or ambiguous.	Most of the space is well defined and its use and purpose clear, <del>with little</del> <b>however some of the space is being 'left over' or and ambiguous, for example, at the end of Ravensbury Grove.</b>	Should be recognised that some of the existing space is 'left over'.
142, 3.229	The landscape of the estate is defined by the surrounding mature trees of Morden Hall Park and Ravensbury Park and the riparian landscape of the River Wandle. This gives the estate its secluded, almost rural feel and is an essential part of its character.	The landscape of the estate is defined <b>influenced</b> by the surrounding mature trees of Morden Hall Park and Ravensbury Park and the riparian landscape of the River Wandle. This gives the estate its secluded, <del>almost rural</del> feel and is an essential part of its character.	The landscape is influenced by the surrounding area but not defined by it. This is a suburban area not 'almost rural' and as such the reference should be removed.
p143, 3.230	A footbridge across the river to an existing access onto Wandle Road would increase the accessibility of the area for residents of the estate and local area significantly.	<del>A footbridge across the river to an existing access onto Wandle Road would increase the accessibility of the area for residents of the estate and local area significantly.</del>	This is not considered to be an issue associated with the existing estate but rather a potential solution that may need to be explored further through the development of the regeneration proposals.

p144		Insert opportunity on housing optimisation and development density	Optimising the potential of land and housing output 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 they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.
p143, 3.236	Where possible, flood risk should be reduced without undermining the landscape character or semi-rural feel of the area.	Where possible, flood risk should be reduced without undermining the landscape character or semi-rural feel of the area.	This is a suburban area not 'semi rural' and as such the reference should be removed.
146, 3.244 and 246	Proposals should investigate working in conjunction with the National Trust to consider the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road. Proposals could investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.	<del>Proposals should investigate working in conjunction with the National Trust to consider the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road. Proposals could investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.</del>	These paragraphs should be removed. The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of a infrastructure, as such infrastructure is not only for the benefit for the Estate, nor is the provision a site specific mitigation requirement.
p.146, EP R1 - b	The corner of the estate adjacent to Ravensbury Park will be expected to make an architectural statement which sensitively addresses the park entrance, river and mill buildings.	The corner of the estate <b>with Morden Road</b> adjacent to Ravensbury Park will be expected to make an architectural statement which sensitively addresses <b>take account of</b> the park entrance, river and mill buildings.	Clarity in text over area the policy refers to.
150, Policy EP R2	B. Ravensbury Grove should be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.	B. Ravensbury Grove, <b>through landscaping</b> , should be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.	Detailed analysis has identified that it is not feasible to extend the actual road to the boundary with the Park; however landscaping measures can be incorporated to provide clear views along the length.
p.150 Policy EP R2	C. Hengelo Gardens should be retained and enhanced, particularly with respect to arrangement of car parking, general landscaping and the potential for flood attenuation measures.	C. Hengelo Gardens should be retained and enhanced, particularly with respect to arrangement of car parking, general landscaping and the potential for flood attenuation measures <b>unless justified through detailed urban design analysis.</b>	The DPD should refrain from being overly prescriptive. Paragraph 59 of the NPPF states that ' <i>design policies should avoid unnecessary prescription or detail</i> '. This is reiterated within the Design PPG which provides guidance on creating 'successful places'. The Design PPG notes that ' <i>successful places can adapt to changing circumstances and demands. They are flexible and able to respond to future needs</i> '. It is therefore considered to be appropriate to allow flexibility in relation to potential parking, landscaping and flood attenuation requirements. that will de developed through detailed design analysis and technical surveys.
p152, 3.269	There is scope to improve this crossing through enhancements to footways and crossing point which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment.	There is scope to improve this crossing through enhancements to footways and crossing point which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment. <b>The Council will investigate the potential of CIL funding being used for the delivery of any potential off-site enhancements.</b>	The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of such infrastructure as it is not only for the benefit for the Estate, nor is the provision a site specific mitigation requirement.
p152, 3.262 and 263	To enhance pedestrian links there is also opportunity to build a new bridge to Ravensbury Park, creating a new North-South pedestrian link from Wandie Road to the Ravensbury Estate.  Within Ravensbury Park there is potential to add additional bridges/walkways across the river and back channel which would allow for a better connection between the Ravensbury Estate and the play area in Ravensbury Park.	To enhance pedestrian links there is also opportunity to build a new bridge to Ravensbury Park, creating a new North-South pedestrian link from Wandie Road to the Ravensbury Estate.  Within Ravensbury Park there is potential to add additional bridges/walkways across the river and back channel which would allow for a better connection between the Ravensbury Estate and the play area in Ravensbury Park. <b>The Council will investigate the potential of CIL funding being used for the delivery of any potential off-site enhancements.</b>	The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of such infrastructure as it is not only for the benefit for the Estate, nor is the provision a site specific mitigation requirement.
p.154 and 155	Diagram	If the diagram is to be retained the northern connection to Morden Road should be removed.	PPG on Design notes that PPG Design ' <i>Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through</i> '. Creating too many links through the site does not always create a well connected plan that integrates with the neighbourhood if the link does not go anywhere. The northern connection is considered to divide the plan further creating more roads than developable area. There becomes in effect more roads and footpaths than area to be developed for residential use which is not considered to optimise the housing potential of the site. The connection to the tram link would be better served from the end of Ravensbury Grove due to the need to cross Morden Road to access the footpath north of the site. Public consultation also confirmed that residents were not supportive of creating a link through the site and as per the NPPF, planning policy should be informed by public consultation comments.
156, 3.273	Ravensbury is located within an area with a low level of Public Transport Accessibility. Taking account of these factors, and application of the London Plan matrix a range of 106 - 288 (gross figure which excludes land occupied by housing to be retained or refurbished ) new homes are anticipated on this site. The council's expectation is for development proposals to be at the higher end of this range.	Ravensbury is located within an area with a low level of Public Transport Accessibility. Taking account of these factors, and application of the London Plan matrix a range of 106 - 288 (gross figure which excludes land occupied by housing to be retained or refurbished ) new homes are anticipated on this site. The council's expectation is for development proposals to be at the higher end of this range. <b>This density range should not be applied mechanically and a design led approach should be taken.</b>	The Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'.
157	Diagram	This diagram is not considered relevant and should be removed.	The land use is to be predominantly residential as existing and therefore the diagram is not considered to be relevant or helpful.
158, EP R5 Open Space	D. All new houses and flats should have gardens and amenity space to meet or exceed current space standards	Delete this reference.	This replicates Merton Development Management Policies and as such is not necessary to repeat in the Estates Local Plan.
p160, Policy C	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible...	<del>The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates....</del>	The proposed amended wording should be consistent with London Plan Policy 5.13.
p.161, 3.288	Reinstatement of a historic river channel running along side Morden Road....	<del>Reinstatement of a</del> <b>Reference should be made in the landscape design to the historic river channel running along side Morden Road, for example through the provision of a dry swale....</b>	This is too prescriptive and does not have regard to viability contrary to the NPPF, particularly para 174. Furthermore, a landscape link does not have to be created through the reinstatement of the watercourse but could be through other measures. It is not considered appropriate in both flood mitigation and safety terms to reinstate the open watercourse. The historic watercourse could however be referenced in the landscape design, for example, through the provision of a dry swale that would create a green buffer and provide additional flood mitigation measures.
p.162	Diagram	Should the diagram be retained, the northern strip of 'illustrative swale' is not an appropriate location for this due to depth of space between road and houses and the location of existing trees. This could however be provided as permeable paving. The Key and plan should be updated to show this and to confirm that flood mitigation measures should not be limited to swales.	Flood mitigation measures should not be limited to swales and other approaches should be included. Flood mitigation measures will be subject to significant technical assessment.

p166, Policy EP R8	<p>a) Buildings heights should not compete with established mature trees which envelope the estate and should not harm the visual amenities from within the adjacent parks.</p> <p>b) Within the development a building height range of 2-4 storeys should not adversely affect views to the surrounding established trees. Relatively open views from within the estate to the surrounding tree canopy are a defining characteristic of the estate and should generally be retained.</p>	<p>a) <b>The site is large enough to create its own character with varied heights.</b> Building heights should be informed by a detailed character analysis not compete with complement established mature trees which envelope the estate and should not harm the visual amenities from within the adjacent parks.</p> <p>b) Within the development a building height range across the site of generally 2-4 storeys should not adversely affect views to the surrounding established trees. <b>Taller buildings up to 5 storeys may be appropriate at focal points.</b></p>	<p>In order to meet the higher end of the density range specified, greater flexibility is required to support the development of scheme that provides buildings of varying heights justified on townscape, visual and amenity terms. The site is considered to be a large site and can therefore form its own character in line with London Plan Policy 3.7 and the Housing SPG.</p> <p>Building heights should be informed by an understanding of the site and surrounding area and developed through a design-led approach. Detailed urban design, townscape and amenity analysis will inform appropriate building heights for the Estate, and therefore the policy should refrain on being overly prescriptive on building heights.</p>
166, 3.297	New development comprising mainly of houses rather than flats is more likely to preserve the landscape character of the estate.	<b>Housing typologies should</b> New development comprising mainly of houses rather than flats is more likely to preserve the landscape character of the estate.	<p>NPPF Para 14 states 'Local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change' and goes on to note at Para 47 that Authorities should 'use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...'</p> <p>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.</p>
166	Diagram	Remove diagram	This is considered unnecessary and should therefore be removed.
166, 3.301	The next chapter outlines the requirements applicants will need to meet in their submission of planning applications. This entails a set of detailed design codes, developed by the applicant, in accordance with the Plan.	<del>The next chapter outlines the requirements applicants will need to meet in their submission of planning applications. This entails a set of detailed design codes, developed by the applicant, in accordance with the Plan.</del>	Delete paragraph as this is not the appropriate place for this within the DPD.
<b>DESIGN CODE</b>			
171, 4.1	This part of the Plan requires the applicant to submit their own design codes for any development proposals.	<del>This part of the Plan requires the applicant to submit their own design codes for any development proposals.</del> <b>provides guidance on any design codes that may be required to support development proposals.</b>	The need for a design code should be determined through pre-application discussions rather than the DPD.
171, 4.2	At the planning application stage, the applicant, will be expected to include as part of their application, a set of design codes that guides the development of each phase of the redevelopment. This should include, but not necessarily be limited to, a number of specific subject areas outlined below. The following guidance lists the subject areas that must be covered and gives guidance on how these subjects will be expected to be addressed.	At the planning application stage, <b>the Council will discuss with the applicant whether it is necessary to submit a design code. This will be dependent on the type of application and level of detail being submitted.</b> <del>will be expected to include as part of their application, a set of design codes that guides the development of each phase of the redevelopment. If required this could should include, but not necessarily be limited to, a number of specific subject areas outlined below. The following design principles lists the subject areas that must may need to be covered: and gives guidance on how these subjects could will be expected to be addressed.</del> architecture and elevations, materials, landscape and biodiversity, flooding and drainage, internal space standards, building and dwelling layouts, building to street interface, street design characteristics, amenity space and refuse storage and collection.	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..." Furthermore the Design PPG requires that "...design codes should wherever possible avoid overly prescriptive detail and encourage sense of place and variety". The proposed design code within DPD enforces unnecessary prescription and detail and its removal is therefore considered appropriate. The need for a design code should be determined through pre-application discussions for the outline planning applications. Furthermore, conditions could be attached to any planning permission to require compliance with certain standards, for example internal space standards, and therefore secure design quality.
p170 to 171 4.3 to 4.15		Delete Design Codes onwards	As above.
174, 5.1	Should regeneration of Merton's three estates go ahead, this currently...	Should regeneration of <b>any</b> of Merton's three estates go ahead, this currently...	There could be a scenario where one or two estates come forward. The same policy basis could be applied to one, two or three estate regenerations.
174, 5.4	CHMP have committed to an open book accounting process to facilitate the understanding of the impact on residents on council services.	<del>CHMP have committed to an open book accounting process to facilitate the understanding of the impact on residents on council services.</del>	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.
174 5.6	Building new homes for existing residents to move into while their home is being built is very important for keeping existing communities together as far as is possible to create the foundations for a sustainable community long-term.	Building new homes for existing residents to move into <b>directly and in a single move (i.e. without the need for a temporary decant)</b> while their home is being built is very important for keeping existing communities together as far as is possible to create the foundations for a sustainable community long-term. <b>It also minimises disruption to existing residents' lives.</b>	It is important to recognise the importance of early delivery housing for the decant of residents.
174	Options for first phase of early housing delivery development on Eastfields	Options for first phase of <b>early housing delivery</b> development on Eastfields	
174, 5.10	It may be possible to build new homes along the boundary of land within St Marks Academy, between Eastfields Estate and Eastfields train station, preserving playing space while providing new homes that create better access between the station and the estate.	It may be possible to build new homes along the boundary of land within St Marks Academy, between Eastfields Estate and Eastfields train station, preserving the appropriate level of playing space while providing new homes that create better access between the station and the estate. <b>This would allow the building of additional new homes which in turn could speed up the overall regeneration of Eastfields. At the same time a number of existing urban design and access issues could be improved with safer pedestrian routes to Micham Eastfields station and new street frontages, while providing new homes that create better access between the station and the estate.</b>	There may be a loss of open space however a detailed exercise to review the quantity and quality of existing provision against need in accordance with paragraph 74 of the NPPF will be undertaken.
176 5.14	Other potential sites were considered and are not recommended to be taken forward.	Other potential sites were considered and are not recommended to be taken forward <b>at this stage.</b>	Housing SPG Policy 3.15 notes that 'Boroughs should ensure that implementation of this Plan's long term, strategic housing policies are informed by, and integrated with, the short to medium term horizon' and hence policy should not restrict further sites coming forward at a later date.
176, 5.15	The council will use section 106 planning obligations and/or CIL 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 key infrastructure and to mitigate impact of development. <b>The Council will update the CIL Regulation 123 to include the items of infrastructure identified in this DPD.</b>	The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of items identified in the DPD, as such infrastructure is not only for the benefit of an Estate, nor is the provision a site specific mitigation requirement.