

6 September 2021

**Future Merton
London Borough of Merton**



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By email to future.merton@merton.gov.uk

Dear Sir / Madam,

**Local Plan 2020 – Stage 3 Consultation
Representations on behalf of Clarion Housing Group.**

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

Since 2010 Clarion has invested in modernising and upgrading Merton's housing stock and this work is ongoing. They have also secured permission to regenerate some of the poorest quality homes at Ravensbury (in Mitcham), Eastfields (in Mitcham) and High Path (in South Wimbledon). Work to progress these regeneration proposals continues, with the first homes handed over at Ravensbury and High Path. Outline planning permission for the regeneration of these three estates, has already been secured by Clarion, and as part of this over 2,700 new homes will be delivered in total, alongside new employment and community spaces, and new open space. Reserved matters have been approved for the next phase at High Path and the remaining phases at Ravensbury. Design work on the first phase at the Eastfields regeneration is being finalised and a reserved matters application is planned to be submitted in November 2021. Policies addressing the regeneration of these estates, contained within the Estates Local Plan (2018), are to be saved as part of the new Local Plan.

Clarion continue to explore opportunities for further investment with a view to delivering greater sustainability benefits, better quality and new homes, employment and training opportunities and enhanced community infrastructure for their residents and the wider Merton community. Clarions' work to continually improve and extend the life of existing housing stock, and improve the life chances of the existing and future communities will continue over the 15 year Plan period. This will include the potential for significant programmes of refurbishment and/or regeneration of other neighbourhoods where the need is greatest and where opportunities for sustainable development exist. A programme to confirm which neighbourhoods are in greatest need of investment and the form that investment might take is already advancing; and residents engagement will form a key part of this process.

Any new homes built as part of future programmes of regeneration will align with national and local carbon targets. Clarion itself is going beyond those current national targets. It has made a commitment to transition away from fossil fuels in all developments from 2022; from 2023 all new homes will be zero carbon compatible (i.e. low energy and no fossil fuel usage); from 2024 all new social and affordable rented homes will be net zero carbon (including in operation); from 2025 all new homes, commercial and community buildings will be net zero carbon

With this above mind Clarion has the following comments:

Policies

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Objective / Policy	Clarion Comment
<p>Chapter 01B. Good Growth Strategy</p>	<p>Clarion supports the Council's commitment to promote higher densities in neighbourhoods with good access to public transport and in opportunity areas, such as South Wimbledon in order to make the most of the limited land in the borough to address the acute housing needs in the borough and London.</p> <p>The commitment to produce an Opportunity Area Planning Framework (OAPF) for Wimbledon, South Wimbledon and Colliers Wood in order to fully realise growth and regeneration potential within this area is welcomed. Clarion would request early involvement in the preparation of the OAPF.</p> <p>We also support the statement that taller buildings can be right in some locations subject to excellent design, good public transport accessibility and impact on existing character.</p> <p>We acknowledge, and support, the Councils commitment to explore opportunities for estate regeneration in Mitcham. However, reference to this being a long-term aspiration should be removed. The Plan covers a 15 year period. Clarion are already progressing with the regeneration of the Eastfields Estate (as supported by the Estates Local Plan) and are also working on a programme to confirm which neighbourhoods are in greatest need of investment and the form that investment might take. This is likely to confirm a series of potential programmes of improvement to be developed and delivered over the Plan period.</p> <p>Should opportunities for sustainable development be identified during the Plan period, the draft Local Plan should positively support this noting the acute housing needs in the borough and limited land resources. This is particularly relevant noting that the London Plan targets assigned to the borough and other London borough fall short of meeting housing needs, as recognised by the London Plan Panel report and Secretary of State directions.</p>
<p>Chapter 14. Mitcham</p>	<p>Clarion support the general objectives of Policy N3.2. However to be consistent with the Good Growth Strategy chapter, the Council should re-iterate that opportunities for estate regeneration be explored in Mitcham. In addition, part d. of the Policy should be amended to support intensification and higher density mixed use residential development to reflect the high residential growth potential identified for the district town centre in the London Plan, and also other London Plan policies which promote increased housing supply and growth in and around town centres (Policies H1, SD6, SD7 and SD8). London Plan Policy H1 also supports the optimisation of sites located within 800m of a town centre boundary and this should be reflected in the policy wording for the surrounding area of Mitcham Town Centre.</p> <p>Support for the regeneration and intensification of the Ravensbury and Eastfields Estates should also be reflected in the policy wording, as a new sub-point between part l. and m. This would be consistent with the acknowledgement of both estates as major development sites at</p>

	<p>paragraph 4.2.9, and would ensure consistency with the Estates Local Plan which will remain part of the Local Plan.</p>
<p>Chapter 07. South Wimbledon</p>	<p>Clarion welcomes the ambition to recognise South Wimbledon as a distinctive neighbourhood in its own right, and supports the proposals for a new Local Centre around the underground station. The regeneration of High Path is a fundamental factor in achieving this, with the outline planning permission allowing for the delivery of new and improved commercial and community floorspace. Taking account of the proposals at High Path, the following amends should be made to the policy:</p> <p><i><u>“Recognising South Wimbledon as a distinctive neighbourhood in its own right to create a vibrant, attractive and thriving new local centre supported by the regeneration proposals at High Path which will deliver higher density housing-led development, along with flexible non-residential floorspace and a new public park, providing economic, social and environmental benefits. Housing delivery will be optimised given the areas excellent access to public transport, improved access to amenities which will be provided by the new local centre and sites location within the Wimbledon, South Wimbledon and Colliers Wood Opportunity Area. We will do this by:</u></i></p> <p>...</p> <p><i><u>j. Work with the regeneration phases being delivered on the High Path estate over the next 10- 15 years, guided by the Estates Local Plan; to deliver intensification and the optimisation of housing delivery alongside non-residential uses to support the new Local Centre, and this includes the proposed public park at High Path;”</u></i></p> <p>On page 254, an image of the draft High Path masterplan proposals is included. Clarion request that an updated image is included to reflect the detailed design approved at Phases 1 and 2. This can be provided to Officers.</p>
<p>Chapter 02. Climate Change</p>	<p>Clarion supports the promotion of environmentally sustainable design as an overarching principle for new development. It is noted that the draft Local Plan outlines the intention to set requirements beyond London Plan 2021 requirements via Policies CC2.2, CC2.3 and CC2.4.</p> <p>The result of meeting more stringent targets will be increased development build costs. Such additional development costs should be explicitly recognised within policy as having a direct impact on viability. The increase of a carbon offset payment from £95 per tonne (set out in the London Plan) to a minimum of £300 per tonne would also have impact on scheme viability, and the justification for this does not recognise physical site constraints which can also restrict the ability of a site to deliver net zero carbon i.e. limitations in roof space including having regard to competing planning considerations such as plant associated with air source heat pumps or the delivery of amenity roof gardens. The Council should robustly test the additional costs through their viability evidence base for the draft Local Plan to ensure that the additional costs arising do not render development unviable such that this could impact the delivery of homes, and in turn affordable housing.</p>

<p>Policy H11.1 – Housing Choice</p> <p>Part d. Requires compliance with Building Regulations Requirement M4(2) and M4(3)</p> <p>Part f. Setting out an affordable housing target of 50% for public sector land, and up to 50% for other land with a minimum provision of 40%. It also requires a tenure split of 70% for low cost rent and 30% for intermediate housing.</p>	<p>Clarion request the addition of a new point between part a. and b.</p> <p><i>“Support proposals to improve the quality of existing homes.”</i></p> <p>Whilst Clarion is generally supportive of the requirements to achieve accessible and adaptable dwellings, it is important that this policy or supporting text acknowledges that compliance with Building Regulation Requirement M4(2) can result in viability and service charge affordability issues, particularly in smaller flatted blocks. As such, as per the flexibility acknowledged in the London Plan (refer to paragraph 3.7.6), the Local Plan should recognise that in some circumstances this requirement would not be imposed.</p> <p>As a Registered Provider, Clarion supports the ambition of the affordable housing policy and also that it acknowledges that viability plays an important role in the delivery of housing. The policy should however acknowledge the specific circumstances of estate regeneration schemes, to conform with London Plan Policy H8, and supporting text to London Policy H4 which confirms that proposals that involve the demolition of existing affordable dwellings must follow the Viability Tested Route.</p>
<p>Policy H11.2 - Housing Provision</p> <p>We will aim to deliver a minimum of 11,732 additional homes for the period 2020/21 – 2034/35. This will be achieved by:</p> <p>a. Working with housing providers to optimise housing;</p> <p>e. Supporting the redevelopment of poor quality existing housing that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of housing to temporary sleeping accommodation on a permanent basis.</p> <p>Paragraph 11.2.1</p>	<p>Clarion support the Councils aspirations to increase their housing target.</p> <p>Clarion support the Councils intention to work with housing providers to optimise housing delivery.</p> <p>Clarion welcome the Councils support for the redevelopment of poor quality existing housing and the aspiration of the policy to preserve the number of residential units / affordable housing units. However, assessing the potential loss of accommodation on a unit basis is not consistent with the London Plan and Mayor of London SPG documents on Housing (2016), and Affordable Homes and Viability (2017). As such, the policy should be amended to refer to habitable rooms or floorspace. We would also request the following addition to the policy to reflect the need to make best use of the limited land in the borough:</p> <p><i>“Supporting the redevelopment of poor quality existing housing that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of housing to temporary sleeping accommodation on a permanent basis. <u>In doing so, the Council will expect that housing delivery is optimised to make best use of the land”.</u></i></p> <p>We request the following amendments to the bullet points:</p>

	<ul style="list-style-type: none"> • <i>“Bringing forward housing capacity through regeneration, including Morden town centre <u>and Wimbledon, South Wimbledon, Morden and Colliers Wood Opportunity Area.</u></i> • <i>Prioritising the development of previously developed land and ensuring it is used efficiently.</i> • <i><u>Intensification of housing as part of estate regeneration proposals.</u></i> • <i>Development of sites identified in Merton’s Housing Trajectory.</i> • <i>Development of windfall sites.</i> • <i>Enabling mixed use development within the town centres, <u>optimising housing delivery via higher density mixed use development in town centres and higher density housing-led development close to town centres.</u></i> • <i>Bringing vacant properties back into use through Merton’s empty homes strategy.</i> • <i>Resisting the loss of housing to other uses.</i> • <i>Preparing masterplans, development briefs and design guidance for larger housing sites.</i> • <i>Demonstrating a continuous delivery of housing for at least 15 years as the Housing Trajectory sets out below.</i> • <i>Setting out a 5-year supply of identified sites as shown in the Authority Monitoring Report.</i> • <i>Monitoring housing provision levels through the Housing Trajectory within the Authority Monitoring Report.”</i>
<p>Policy D12.6 – Tall buildings</p>	<p>Clarion welcomes the inclusion in the policy that tall buildings can <i>“also be suitable on sites that can demonstrate that they are suitable for tall buildings through townscape analysis and a masterplan approach to design and delivery”</i>.</p> <p><u>High Path</u></p> <p>We welcome the acknowledgement of the High Path estate within the policy. However, South Wimbledon (which the High Path estate falls within) should be included within the third paragraph of the policy (and subsequent policy wording – see below) alongside the town centres of Colliers Wood, Wimbledon and the wider Morden town centre.</p> <p>Given the quantum of new homes planned for South Wimbledon and its identified potential for additional housing, commercial and employment growth in the draft Local Plan, there is a strong case for it to be specifically referenced as a location suitable for tall buildings. There are taller buildings already located in South Wimbledon, and taller buildings have been approved as part of the High Path regeneration. Although dated, the Tall Buildings Background Paper (2010) also recognises High Path as an area where tall buildings could be explored as part of a masterplanning exercise. In this regard, the masterplanning exercise carried out by Clarion (and accepted by the Council via the grant of outline planning permission) has demonstrated the suitability of the site for tall buildings. There is also support for taller buildings at High Path in the Estates Local Plan where Policy EP H8 states: <i>“Taller buildings may be considered appropriate to facilitate intensified use of the site. Such buildings must be located appropriately</i></p>

and relate well to the surrounding context and public realm, particularly at street level.”

London Plan Policy D9 says that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements the plan. This process should involve a consideration of the areas identified for growth. The spatial strategy for the borough, as outlined in early chapters of the draft Local Plan identifies South Wimbledon as one of the growth areas in the borough. The potential for growth and higher densities is also a key driver for the support for the regeneration in the Estates Local Plan.

In addition, the Council’s Character Study SPD outlines criterion for considering the suitability of sites for tall buildings, with reference to proximity to a town or local centre, opportunity or intensification areas, proximity to a public park, proximity to a station, and accessibility to public transport. In this regard the following is noted:

- A local centre is planned at South Wimbledon, inclusive of parts of High Path.
- High Path falls within an opportunity area
- High Path proposes to deliver a public park
- High Path is adjacent to South Wimbledon station and has excellent public transport accessibility.

It is therefore clear that High Path is suitable for tall buildings in principle.

Eastfields

Opportunities for growth are also identified in other parts of the borough including around the town centres, for example Mitcham. In the absence of any up-to-date evidence on tall buildings, the policy should recognise the potential for tall buildings in the growth areas more generally. For example it is noteworthy that the Eastfields Estate (in Mitcham) has outline planning permission for buildings that qualify as ‘tall’. Furthermore, Estates Local Plan Policy EP E8 lends support to taller buildings subject to careful siting. The draft Local Plan policy should therefore acknowledge this to ensure conformity.

Policy Amendments

The following amendments should be made to the Policy:

“Tall buildings in the borough are defined as a minimum of 6 storeys or 18 metres measured from the ground to the floor of the uppermost storey as set out in Policy D9 of the London Plan.

In the right locations, tall buildings can make important contributions towards delivering new homes, economic growth and sense of place. They can act as visual markers, such as the redeveloped Britannia Point in Colliers Wood, provide architectural variety, such as Glebe Court in Mitcham, and optimise a sites potential for homes and jobs such as the future of High Path in South Wimbledon and Eastfields in

	<p><u>Mitcham</u>. It is crucial that tall buildings are of the highest quality of design and construction.</p> <p>Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre, <u>South Wimbledon</u> and the Wider Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case.”</p> <p>Additional sub-points after r.</p> <p><u>s. They form part of a masterplan-led regeneration proposals developed having regard to townscape analysis, such as the masterplan proposals at High Path and Eastfields estates.”</u></p>
<p>Green Infrastructure Map 2 - Eastfields</p>	<p>The approved regeneration scheme at Eastfields (ref: 17/P1717) proposes development on a small quantum (approx. 0.6ha) of poor quality designated open space that runs along the site’s boundary with the cemetery. Merton’s Estates LP Policy EP.E5 (a) states that There must be equivalent or better re-provision of the area of designated open space at the boundary with the cemetery in terms of quality and quantity to a suitable location within the estate. The approved scheme provides replacement public open space within the site boundary. As such it was accepted that the development could proceed on the designated open space.</p> <p>The Development Zone parameter for Eastfields is appended to this letter showing the zones identified (and approved) for development.</p>
<p>Opportunity Area Map</p>	<p>Clarion supports the expansion of the Opportunity Area to include the Ravensbury Estate.</p>
<p>Economies and Policies Map</p>	<p>Paragraph 13.6.4.... says “<i>the Primary Shopping Area is where the council would expect to see a large concentration of convenience, comparison and service retail shops (E Use Class)</i>”. We suggest this should include community and leisure uses falling under Use Class E to reflect the strategy for High Path which includes community and commercial uses along Morden Rd and Merton High Street within the Primary Shopping Area.</p>
<p>Site Allocation Wi8 – South Wimbledon Station</p>	<p>Clarion supports this allocation, adjacent to the High Path Estate, and the intent to consult with Clarion to optimise housing delivery on both sites.</p>

Clarion looks forward to working closely with the Council to deliver new homes (including affordable housing) and sustainable neighbourhoods within the borough. It welcomes the ambition of the draft Local Plan in this regard, however, it is respectfully asked that consideration be given to the comments raised above with a view to supporting opportunities to improve the quality of existing housing, to deliver new homes (including affordable housing) and to facilitating regeneration opportunities to make the best use of the limited land resources in the borough. We ask that the Council continues to engage with Clarion in its consultations and we would like to be kept informed about opportunities to participate in the examination process as the draft Local Plan progresses.



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

Yours faithfully,

Savills



Standard notes

1. Do not scale this drawing unless by agreement with Levitt Bernstein, Cullinan Studio and Proctor and Matthews Architects.
2. All dimensions must be checked on site and any discrepancies verified with the architect.
3. Unless shown otherwise, all dimensions are to structural surfaces.

This is not a construction drawing, it is unsuitable for the purpose of construction and must on no account be used as such.

- Drawing notes**
- Site boundary
 - Maximum building footprint. (This does not include any building projections).
 - 10m Minimum distances between building footprints.
 - Indicates direction of street view
 - 1 Street view along indicative 10m lane
 - 2 Street view along central route to Sparks showing the cemetery in the background
 - 3 Street view along flatted lane
 - 4 Street view along the Formal Entrance Green
 - → Key Views down to Cemetery

Note 1: projections from the blocks are not included in the maximum building footprints.

Note 2: projections could include balconies, canopies, oriel windows or other design features.

Note 3: for views refer to page 85 of the Design Code.

FOR APPROVAL

Eastfields Estate Regeneration

Outline Planning Application

Client Clarion Housing Group Ltd	Date 12/01/2018
Project address Eastfields Estate	Author RR
Scale 1:1250@A3	Checked VD
File Name EP-LBA...M3-A-Masterplan	Drawing Development Zones and Key Dimensions
	Drawing number 004
	Revision D

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