

Inspectors' Matters, Issues and Questions – April 2022

Matter 7: Does the Plan identify a sufficient supply and mix of housing sites, and are those identified for the five years after anticipated adoption deliverable?

Issue (i) are the housing sites included in the Plan based on a clear understanding of the land available in the Borough?

Q.1 Are the housing sites included in the Plan based on a clear understanding of the land available in the area?

Council response:

- 7.1. Yes, the housing sites included in the Plan are based on a clear understanding of the land available in the area, in accordance with NPPF paragraph 68. Together with all other London boroughs and led by the GLA, Merton Council participated in a [London-wide Strategic Housing Land Availability Assessment \(Submitted Document 11D2\)](#). The Plan identifies sufficient supply and mix of sites, taking account of their availability, suitability and likely economic viability.
- 7.2. In addition to the London-wide SHLAA council has also carried out engagement with landowners such as the “call for sites” and further rounds of Regulation 18 (as outlined in [0D8 Merton Consultation Statement](#)) and the robust evidence to give a holistic understanding of the land available in the borough (for example [12D1 Merton's Borough Character Study](#); [LBM01b economic evidence base](#); [5D1 Morden Strategic Development Framework](#); [9D1 FutureWimbledon SPD](#); [15D1 Merton Green Infrastructure and Open Space study](#)).

Q.2 Is the distribution of housing sites included in the Plan informed by, and in accordance with, the spatial strategy for the Borough?

Council response

- 7.3. Yes, the distribution of housing sites included in the Plan is informed by and in accordance with the spatial strategy for the borough.
- 7.4. The spatial strategy for the borough recognises Wimbledon as the council's only Major Centre and the focus for most office-based jobs due to its market attractiveness. There is more limited scope for new residential development due in part lack of capacity in this well-developed, compact major centre and lack of opportunity for appropriate alternative locations for businesses that have the same market demand. Other town centres (Colliers Wood, Mitcham and Morden) can accommodate residential development above town centre type uses and sites in all three town centres are proposed for allocation for a mix of town centre type uses and residential. This is particularly the case for Morden where the spatial strategy proposes wholesale regeneration to take place over 15 years: improving the

streetscene and public realm, providing new homes and the necessary services and infrastructure to support existing and new residents.

- 7.5. Merton is for the most part previously developed with a substantial amount of historic Common land at Mitcham and Wimbledon Commons and other parks and gardens (Morden Park; Morden Hall Park; Canon Hill Common etc) spread across the borough. Broadly the north of the borough developed between Victorian and Edwardian times, with most of Merton's historic conservation areas situated in the north west. Much of the southern half of the borough is made up of short terraces and semi-detached inter-war homes laid out on tree lined streets. The spatial strategy supports the continued regeneration of post war housing estates as detailed in Merton's Estates Local Plan 2018.
- 7.6. The spatial strategy supports new homes of all types and sizes throughout its residential areas. Some large sites for new homes (sometimes with a mix of other uses) are proposed for allocation throughout the borough; however the spatial strategy also recognises the importance of small sites for new homes, given the previously developed nature of Merton and the fragmented land ownership and high land values.
- 7.7. As stated above in response to Question 1 and elsewhere in the council's responses, the spatial strategy is supported by a wealth of robust evidence, including Strategic Flood Risk Assessments (submitted documents 15D2 to 15D7) which help inform the distribution and allocation of housing sites. It is also in general conformity with the London Plan, and the spatial strategy defines the Wimbledon / South Wimbledon / Colliers Wood Opportunity Area at the heart of Merton, linking these three town centres.

Issue (ii) What are the implications of the 2021 Housing Delivery Test (HDT) Results, and would the MM proposed by the Council address these in an effective and justified manner?

Q.1 We note that the figures included in the HDT Results differ from the Council's assessment over the same period (included in Graph 2.1 of '11D10 Merton's Housing Delivery Test Action Plan', with further explanation given in LBM01). We are also aware that, as set out in LBM02, the Council has queried the published HDT Result with the Department of Levelling Up, Communities and Housing (DLUHC). Nevertheless, at the time of drafting these MIQs, the HDT Result for the Borough remains in place with the implication that the five-year supply should include a 20% buffer⁶¹.

Against this background, and taking into account the contents of LBM01⁶² would proposed MMs ensure that the Plan would be effective and compliant with the Framework in terms of delivery of the required 20% buffer as part of its five-year supply?

Council response

- 7.8. In April 2022 Merton Council received a response from the Department of Levelling Up, Communities and Housing. This is submitted as Appendix 1 to this Matter.
- 7.9. In summary, the response from DLUHC confirms that government's 2021 Housing Delivery Test results which were published in January 2022 after the Local Plan submission, have retrospectively altered Merton's housing target for 2019/20.
- 7.10. In government's housing delivery test 2020, Merton's target for 2019/20 was 377 new homes; these results were included in [11D1 Merton's Housing Delivery Test Action Plan November 2021](#)
- 7.11. In government's housing delivery test 2021, Merton's target for 2019/20 was amended to be 526 new homes.
- 7.12. As stated in Appendix 1 to this Matter, the difference in housing requirements for 2019/20 is because government's 2021 Housing Delivery Test uses the 2021 London Plan as the housing requirement source with its target of 918 new homes per year before the Covid19 reduction was applied) However the 2020 Housing Delivery Test uses the 2016 London Plan, which had a lower housing target for Merton (411 new homes per year before the Covid19 reduction was applied)
- 7.13. As the new London Plan was adopted on 2 March 2021 and backdated to 1 April 2019, both plans are valid in 2019/20 for the purposes of the 2021 Housing Delivery Test but in 2020, government only used the 2016 London plan as valid.
- 7.14. The 2021 London Plan takes precedence in line with Paragraph 17 in the Housing Delivery Test rulebook which states:
- 7.15. *"For the purposes of calculating the Housing Delivery Test, the new adopted housing requirement will apply from the start of the relevant plan period (set out in*

⁶¹ Per paragraph 74(c) of the Framework.

⁶² Pages 140 to 145

the strategic policies for housing), which may be earlier than the adoption of the strategic policies”.

- 7.16. Against this background, proposed Main Modifications including a new housing trajectory would ensure that the Plan would be effective and compliant with the Framework in terms of delivery of the required 20% buffer as part of its five-year supply.

Issue (iii) Are the housing sites identified to provide the required supply for the five years from adoption deliverable?

General Question:

Q1 What steps has the Council taken to implement the recommendations made in Chapter 8 of the 'Housing Delivery Study'⁶³?

Preamble:

The Framework Glossary is clear that to be considered deliverable sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Council response:

7.18. Chapter 8 of [Merton's Housing Delivery Study \(Submitted Document 11D6\)](#) [published](#) in April 2021, sets out, at paragraph 8.1 *recommendations for achieving higher housing delivery in Merton, focussing on key areas for exploration for the council.*

7.19. These key areas of exploration and recommendations are developed across the whole chapter. The response will focus on the matters relating to plan-making

Heading 1 – establishing a clear policy framework.

7.20. Since the publication of Merton's Housing Delivery Study in April 2021, the council has

- a) Progressed the Local Plan (paragraphs 8.3 to 8.5)
- b) Adopted [Merton's Borough Character Study \(12D1\)](#) and [Small Sites Toolkit \(12D2\)](#) to provide guidance on scope for infill development and guidance on massing, materials, relative height etc for each character area in recognition of the characteristics of Merton's small sites (paragraphs 8.6 to 8.11)
- c) Providing a borough-level housing mix in Local Plan policy H11.3, based on evidence including [Merton's Strategic Housing Market Assessment \(11D8\)](#) and the [London Plan 2021 \(Submitted Document 0D32\)](#) which must be taken account of in residential developments. The policy also states *The borough level*

⁶³ Document reference 11D6

housing mix will be applied having regard to relevant factors, including individual site circumstances, site location, identified local needs and economics of provision which will provide the necessary flexibility for smaller or complex sites in considering the housing mix. (paragraph 8.12 bullet point 1)

- d) Provided clarity (should the relevant Main Modifications be accepted) including strategic heights diagrams in Policy D.6 Tall Buildings and certainty on building heights for specific sites in line with the requirement for general conformity with the London Plan (delivering paragraph 8.12 bullet points 2 and 3)
 - e) Finalising the Local Plan to release specific Strategic Industrial Location sites that have greater opportunities to provide mixed use intensification (e.g. Site Mi1 Benedict Wharf) and identifying when Local Plan policies should be reviewed if there was deemed to be further opportunity for mixed use intensification of designated industrial land. (paragraph 8.12 bullet point 4)
 - f) Finalising the Local Plan to allocate specific sites in town centres, all of which are allocated with some capacity for residential development either solely or part of a mix of appropriate town centre type uses (e.g. CW2, CW3, CW5, Mi8, Mi11, Mi12 MO4 (proposed as a modification to become MO1) (paragraph 8.12 bullet point 5)
 - g) The council has had regard to references to the Planning White Paper proposals including “permission in principle” for certain developments that accord with Design Codes and will take this forward should government introduce this. (paragraph 8.13).
- 7.21. Taking into account that Merton’s Housing Delivery Strategy was published in April 2021, some recommendations will be considered over the forthcoming administration following the local elections in May 2022. This includes factors that involve more or different resources (paragraphs 8.14 to 8.16 and 8.24 to 8.30) and further masterplans (in addition to those already published such as the [Future Wimbledon SPD \(Submitted Document 9D1\)](#) and engaging more effectively with the market (paragraphs 8.37 to 8.41) although some of this work has already been undertaken.
- h) The Local Plan, informed by evidence such as the [London-wide Strategic Housing Land Availability Assessment \(11D2\)](#) and the [London Plan 2021 \(Submitted Document 0D32\)](#) has already proposed the allocation of sites in areas around the Tramlink stops and other public transport nodes such as railway or underground stations (e.g. Site Mi1; Site CW2 Site Wi16)
- 7.22. Under the heading “a more direct role for the council”, the council has undertaken some of the recommendations and more will be considered over the course of the next administration:
- i) [In March 2022, the council approved Compulsory Purchase Orders](#) which will facilitate the regeneration of estates at Eastfields, High Path and Ravensbury (paragraph 8.19)
 - j) In December 2021, the council also approved the disposal of surplus council-owned sites for affordable housing (some of which are also allocated in the Local Plan) and seeking to achieve 100% affordable housing (paragraph 8.20 to 8.21)

- 7.23. Under the heading “boosting delivery of affordable housing” (paragraphs 8.31 to 8.36) as well as the disposal of council-owned sites for affordable housing as above, the council has progressed the local plan policy towards securing affordable housing contributions from smaller as well as larger housing sites in recognition of the characteristics of Merton’s housing market.
- 7.24. Under the final heading “engaging with the community”, in summer 2021 the council undertook “your Merton – our biggest ever conversation” using a variety of techniques (specialist focus groups led by communities, interactive mapping website, telephone interviews with +1,000 people, workshops etc). This was broader than planning matters. The final report was published in late 2021 and work is underway to progress the actions arising from it.

With these considerations in mind, we have the following questions relating to sites identified as contributing to the five year supply, and the contents of the ‘Five Year Housing Supply Proforma’ (Document Reference 11D15a):

- 1. The 11D15a document anticipates the delivery of 430 homes on the Benedict Wharf (Allocation Mi1) site as a contribution the Borough’s five year housing land supply:**

- a) Has the decision notice been issued on the related planning application?**

Council response

- 7.25. The GLA (the deciding body in this case) issued the Decision Notice for [Planning permission 19/P2383](#) on 25th March 2022. The period for judicial review has since lapsed and no review has been received.

- b) Is the anticipated start on site of 2023 justified given that the current application only seeks to secure outline consent (with all detailed matters reserved for future determination)?**

Council response

- 7.26. The council apologises for a mistake in 11D15 Five Year Housing Supply Proforma where the start on site is proposed as 2023. This should read 2024. The council is proposing a Main Modification to update the housing trajectory. Delivery of up to 850 homes at the Benedict’s Wharf site is anticipated to be between 0-5 and 5-10 years with the first phases of homes in 2025/26 and the final phases in 2028/29.

- c) The site has an established use for waste management – have the implications of any land remediation work that may be necessary as a result of this previous use informed the estimated delivery timescales for the site?**

Council response

7.27. Yes, the implications of any land remediation work that may be necessary as a result of this previous use were contained in the planning application 19/P2383 and have informed the estimated delivery timescales for the site.

- d) It is noted that the site owner does not intend to develop the site and is looking to transfer it to a housebuilder – are there any further updates on this matter?**

Council response

7.28. Yes. As at May 2022 the council has been in touch with the current landowner, SUEZ. The landowner has an exclusivity agreement with a large London housebuilder and this agreement has been in place during part of the planning application and Local Plan process. Discussions have also taken place with Registered Providers for the affordable housing element.

- e) The planning application is to be subject to a s106 agreement, which amongst other things, would appear to restrict redevelopment of the Benedict Wharf site until compensatory waste processing capacity at Beddington Resource Recovery Facility is operational⁶⁴ - how have the potential implications of this been factored into assumptions about the delivery phasing of the site?**

Council response

7.29. As set out in Suez's representation to Regulation 19 of Merton's Local Plan, Suez owns an existing waste site allocated as Site S12 in the London borough of Sutton (Beddington Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH) The Beddington Resource Recovery Facility has full planning permission for the necessary waste management uses, however it was rented to the NHS for Covid19 testing, leased until the end of June 2022. SUEZ have discharged many of the pre-commencement conditions for the Beddington Resource Recovery Facility site and have confirmed to the council that implementation is due to start in 2022 with a 12 month build time.

- f) There appear to be discrepancies between the boundaries of the site as shown on the policy map, and the one depicted in the site allocation itself**

⁶⁴ Per the Regulation 19 Response of Suez

– which boundary is to be taken as the correct one and what implications might this have for the overall capacity of the site, and the likely contribution to the five year supply?

Council response:

- 7.30. The Policies Map ([Document 0D2](#)) and the Mitcham site allocations map (page 117 of [Document 0D1](#)) are both correct and show the right boundary for site allocation Mi1. The council is aware of a minor error in the Site Allocation map (page 118 of [Document 0D1 Local Plan](#)) and an additional modification is proposed to illustrate the correct boundary.
- 7.31. There are no implications for the capacity of the site or contribution to the 5-year housing supply, as the error in the site allocation was only related to a single map, and all other site details are correct.

g) Have the implications of any required upgrades to the water supply or wastewater networks informed the anticipated phasing of the site's delivery – in line with the timescales set out in Thames Water's Regulation 19 Response⁶⁵, and their expectations that any such works would be completed prior to occupation of the development?

Council response

- 7.32. In addition to their response to the council at Regulation 19, Thames Water has also responded to the Benedict Wharf [planning permission 19/P2383](#) requesting that planning conditions be added to the decision to ensure that water and wastewater upgrades be undertaken prior to the occupation of the development. The Decision Notice for the site contains these relevant planning conditions. As this type of planning condition is common for major development sites, it is factored into previous timescales for construction of large schemes in Merton.

2. Are there any further updates on the compulsory purchase order process relating to the Eastfields Estate and High Path Estate Regeneration programmes?

Council response

- 7.33. [On 21st March 2021 Merton's Cabinet resolved to make the Compulsory Purchase Orders](#) for Eastfields (phase 1), High Path (phases 2 and 3) and Ravensbury (phases 2-4, the remainder of the estate).

3. The 'Housing supply and delivery' PPG66 sets out that housing completions should be net figures, so should offset any demolitions.

⁶⁵ "For example: local network upgrades take around 18 months and Sewage Treatment and Water Treatment Works upgrades can take 3-5 years"

⁶⁶ Paragraph: 029 Reference ID: 68-029-20190722 Revision date: 22 July 2019

Have demolitions of any existing housing stock pursuant to the estate regeneration programmes been taken into account in estimates of their contribution towards five year supply?

Council response

7.34. Yes, demolitions of existing housing stock as part of estate regeneration has been taken into account in estimates of their contributions towards five year supply and demolitions continue beyond the first five years.

7.35. For example, for High Path estate in the first five years the Housing Trajectory takes account of the demolition of 382 homes across three years and for Eastfields, 153 homes are forecast to be demolished in the first five years. The majority of the +3,500 new homes to be built across these two estates will be built from years 6-15. This means that the borough's housing targets for the first five years are minus 535 new homes due to the nature of estate regeneration. The table below demonstrates where the demolitions associated with Merton's estate regeneration occur within the first five years of housing delivery.

Place Name	Description	22-23	23-24	24-25	25-26	26-27
High Path Estate	Demolitions			-78	-100	-126
Eastfields Estate	Demolitions			-53	-100	
Ravensbury Estate	Demolitions					

7.36. The council understands that the Department for Levelling Up, Housing and Communities and the GLA are considering alternatives as to how demolitions should be counted in estimating contributions towards five year supplies. These alternatives include counting demolished homes in the same year as the relevant completion of the new homes (i.e. net gain in the same year) rather than in advance. This would make a positive difference to any borough's five year supply where estate regeneration was part of the delivery.

4. Is there any further update on the reserved matters application in respect of the Eastfields Estate?

Council response

7.37. Yes, the decision notice for [planning permission 21/P4430](#) was issued on 29th April 2022 for Eastfields Phase 1 "Application for Reserved Matters (Phases 1A, 1B, 1C, 1D & 1E) following Outline Planning Permission 17/P1717 (as amended by Section 73 application reference 21/P4078) relating to the Outline Planning Application (with all matters reserved, except in relation to parameter plans) for the comprehensive regeneration of the Eastfields Estate comprising the demolition of all existing buildings and structures; erection of new buildings providing up to 800 residential units (C3 Use Class); provision of up to 275 sqm of non-residential floorspace (flexible use Classes A1 and/or A2 and/or A3 and/or A4 and/or B1 and/or D1 and/or D2) provision of new public open space and communal amenity spaces including children's play space; new public realm,

landscaping works and new lighting; cycle parking spaces (including new visitor cycle parking) and car parking spaces (including within ground level podiums), together with associated highways and utilities works”.

5. There are several allocated sites (Mi4, Mi5, Mi11, Mo2) anticipated to deliver housing in the first five years of the Plan on Council-owned sites. Although the Council has resolved to grant planning permissions for these, this is subject to ‘enabling agreements’. Moreover, the Council is now looking to dispose the sites, with an anticipated date for completion of the sale in Summer 2022⁶⁷. Against this background, is there clear evidence that housing completions will begin on site in the next five years? Will any measures be put in place as part of the onward sale of the sites to secure their development for housing within that period?

Council response

- 7.38. In December 2021 the council resolved to dispose of council-owned sites **Mi4, Mi5, Mi11** and **Mo2**. The sites **Mi4, Mi5, Mi11** and **Mo2** all have resolution to grant planning permission, they are not encumbered by tenancy agreements and are all vacant at time of sale.
- 7.39. There is no impediment to these sites being built out within five years.
- 7.40. Details of the particular sales remain confidential.

6. It is anticipated that the Mi16 Mitcham Gasworks site would be capable of delivering 450 dwellings in the five years following adoption. The site does not benefit from planning permission, and although pre-application engagement has been undertaken and is ongoing (including design review) an application is yet to be submitted.

- a. The submitted Plan gives an indicative site capacity of 200 to 400 dwellings for Mi16 – what is the justification for the 450 anticipated by 11D15A, and are any MMs needed to ensure that the allocation accords with any up-to-date assessments of capacity?

Council response

- 7.41. Since the submission of 11D15a ([Housing Supply proforma Type A and Type B sites updated 28th March 2022](#)) the council and the landowner of Mi16 Mitcham Gasworks have engaged and prepared a Statement of Common Ground which is attached as an Appendix to this Matter 7.
- 7.42. The council is therefore proposing two Main Modifications within Site Allocation Mi16 Mitcham Gasworks to ensure that the allocation is justified and positively prepared and accords with up to date assessments of capacity:

⁶⁷ Per 11D15a

Proposed Main Modification to Site Allocation Mi16 Mitcham Gasworks

MM4.3	159 161	Site Allocation Mi16 Mitcham Gasworks Western Road, Indicative site capacity (p 159), Approach to tall buildings (p161)	Indicative site capacity: 200-400 Around 650 new homes ... Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to 10 storeys subject to consideration of design policies, along with a replacement telecoms mast on top of the tallest building, impacts on existing character, heritage and townscape.	Updated to ensure that the Plan is justified and effective, reflects the latest information as agreed in the Statement of Common Ground with the landowners and	May 2022 - response to the Inspectors' Matters Issues and Questions
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b. Is it acceptable in principle that tall buildings are considered as part of an approach to maximising the development potential of the site?

Council response

7.43. Yes, it is acceptable in principle that tall buildings are considered as part of an approach to maximising the development potential of this large (2.4 hectare) site for new homes. More detail is set out in the council's response to the Matters on tall buildings.

c. As this is a scheme that would be referable to the Mayor of London, are the anticipated 5 year delivery timescales and quantities justified?

Council response

7.44. The Mayor of London has been engaged on this site since 2018 on the proposed site allocation for Mi16 Mitcham Gasworks. Regarding the forthcoming planning application, the landowner has already engaged with the GLA and the council at the pre application stage on more specific aspects of the site. The anticipated delivery timescale is five years, based on responses from the landowners.

d. What implications (if any) would the hazardous substances consent relating to the site have on housing delivery?

Council response

7.45. While the site has not been used as a gasholder for many years, the Hazardous Substance Consent will have to be cancelled to enable the redevelopment of the site. Some initial decontamination works have already started to this end; in January 2022 the gasholder structure was removed and other infrastructure has also been removed from the site. It would have no implications on housing delivery once removal is complete.

e. 11D15A indicates that the gas holder has been demolished and that decontamination of the site is ongoing – what is the timescale for this work, and are any further permissions required to bring the site to a condition ready to accommodate residential development?

Council response

7.46. While the site has not been used as a gasholder for many years, the Hazardous Substance Consent will have to be cancelled to enable the redevelopment of the site. Some initial decontamination works have already started to this end; in January 2022 the gasholder structure was removed and other infrastructure has also been removed from the site. It would have no implications on housing delivery once removal is complete.

7. Given that planning permission is not yet in place, are the timescales for completion of the White Hart and Car Repairs, Kingston Road scheme justified, and in line with the average decision to completion times set out in the 'Housing Delivery Study'⁶⁸? Is there any specific evidence relating to this site to indicate that development would take place at the rate anticipated?

Council response

7.47. The planning application 21/P2565 is scheduled for decision shortly. The updated housing trajectory moves delivery of 56 homes to complete in 2025/26. This is reflected in the Main Modification to update Merton's Housing Trajectory.

8. Is there any further update on when a decision may be due on the planning applications for the Brown and Root Phase 2 site? What are the working assumptions as to when a decision is expected that have informed the Council's view on its ability to contribute to five year HLS, taking into account the average decision to completion rates set out in the 'Housing Delivery Study'⁶⁹?

Council response

7.48. No, there is no further update since the previous information was supplied in March 2022.

9. Is planning permission now in place for the Wi7 Rufus Business Centre site?

Council response

7.49. The planning application for Rufus Business Centre (21/P1780) was considered by Merton Planning Application Committee on 17 March 2022, with an officer recommendation to grant permission subject to conditions and a Section 106 agreement.

7.50. Minutes of Merton's Planning Committee held on 17th March 2022 confirm that no decision was made at the meeting and the application has been deferred to a future planning committee. Pending the appointment of the new Planning Committee councillors following the election in May 2022, the next Planning Committee will take place on 16th June 2022.

⁶⁸ In particular those set out in Table 6.3 relating to new build schemes of 50-99 units

⁶⁹ In particular those set out in Table 6.3 relating to new build schemes of 100+ units

10. What evidence is available to support the anticipated delivery phasing for Mi8 Majestic Way, and what steps have been taken to secure the vacant possession of the site, on which its build out is 'predicated'?

Council response

7.51. The council has engaged with the landowner on the delivery timescales. The landowner has confirmed that details of the lease arrangements, including the end dates, are commercially confidential and should not be put into the public domain at this time. The landowner confirms that the anticipated delivery phasing for Site Mi8 Majestic Way is robust.

11. Given the lack of definitive proposals at this stage for the Mi18 Wilson Hospital site, and the apparent inter-dependencies with the development of other NHS Property Services landholdings in the area including Mi2, to what extent are the anticipated 5-year residential yields of these sites based on clear evidence?

Council response

7.52. As explained in more detail in our response to Question 12 below, in the light of a firm timetable for the delivery of homes or the healthcare hub and pending Mitcham Health and Wellbeing Hub being fully funded from a variety of sources, the council has updated the housing trajectory to move the 77 homes that these sites could provide to years 5-10 and out of the five-year housing land supply.

12. Following from the question immediately above, and in the light of NHS Property's Services' response at Regulation 19 on its approach to surplus land disposals are the criteria restricting redevelopment of the M2 and Mi18 sites until alternative facilities are built and operational justified? Would the criteria act as restrictions on the timely development and viability of the sites?

Council response

7.53. Yes, the criteria restricting redevelopment of Site Mi2 (Birches) and Site Mi18 (Wilson Hospital) until alternative facilities are built and operational are justified. The council has considered NHS Property Services response at Regulation 19 and submitted on 20th May 2022 in coming to this conclusion.

7.54. The NHS Property Services responses to Regulation 19 (September 2021) and again in May 2022 confirms that the receipts from disposal of NHS property is reinvested to support the delivery of health infrastructure. It does not confirm that this reinvestment happens locally, to provide identified healthcare and wellbeing services within the same Clinical Commissioning Group area or borough boundary. It is the council's understanding that the Department of Health and NHS Property Services reinvest receipts from the sale of NHS property to anywhere within the NHS in England, taking a centralised approach and that no ringfencing of these funds is permitted as standard practice to be reinvested in local healthcare services. [Mitcham Health and Wellbeing Programme Board papers from the most recent meeting on 12th April 2022](#) confirm in Slides 13 and 14 that

- (a) The project to invest in a Mitcham healthcare and wellbeing hub is not fully funded and would rely on recycled capital receipts and bids for other funding such as Community Infrastructure Levy.
- (b) That the ability to retain 100% of receipts from NHS properties located in Merton that have been or will be disposed of to help fund the Mitcham Health and Wellbeing Hub is dependent on the national NHS Property Services Board approval.

7.55. In these circumstances, the council considers that the approach of ensuring new local healthcare provision is completed before Site Mi2 Birches or Site Mi18 Wilson are disposed of for other uses is robust and justified. This approach will ensure that at least one site within Mitcham is retained to support local healthcare provision while also enabling surplus sites' redevelopment for new homes, should sites not be needed for healthcare. It will prevent the disposal of all NHS sites while there is demand for the Mitcham Health and Wellbeing Hub and pending its full funding.

7.56. The inclusion of some homes from sites Mi2 Birches and Mi18 Wilson was based on pre application discussions between NHS Property Services and the council held in 2021, as referred to in NHS Property Services' May 2022 statement. However, in the light of a firm timetable for the delivery of homes or the healthcare hub and pending Mitcham Health and Wellbeing Hub being fully funded from a variety of sources, the council has updated the housing trajectory to move the 77 homes that these sites could provide to years 5-10 and out of the five-year housing land supply.

13. In the context of the average time taken from a planning application to completion of a scheme set out in the 'Housing Delivery Study'⁷⁰ what clear evidence is there to demonstrate that the anticipated residential conversion of the Tooting Police Station site would deliver in 60 dwellings by 2023/24?

Council response

7.57. The Tooting Police Station site is proposed for refurbishment with potentially some extensions to deliver new homes, which is likely to be quicker to deliver than new build, on which the Housing Delivery Study averages are based.

7.58. Although pre application engagement is ongoing, the delivery of homes on this site has been moved to 2024/25 for the purposes of Merton's housing trajectory.

14. Given the apparent early stage of scheme development in relation to Wimbledon Chase Station, and the acknowledged "sensitivities of constructing so close to an operational train station" to what extent can there said to be clear evidence, which justifies the inclusion of its anticipated site yield within five-year supply estimates?

Council response

⁷⁰ In particular those set out in Table 6.1 relating to schemes of 50-99 units.

7.59. As the site has not progressed beyond pre application discussions at this time, the council proposes to move the anticipated delivery of this site within years 6-10 of Merton's housing trajectory.

15. Whilst the Council's intent to dispose of the Wi1 Battle Close site is noted, given the lack not only of any relevant planning permission relating to the site, but also of evidence of any pre-application discussion on the part of any potential developers, is its anticipated delivery phasing justified?

Council response

7.60. Site Wi1 Battle Close is a freehold site in the council's ownership located in the Wimbledon area. The council have undertaken architectural and viability capacity studies and soft market testing with the property industry regarding its redevelopment. The existing buildings on the site have been demolished and in December 2021 the council resolved to dispose of the site. Delivery of homes on this between 2025 and 2027 is justified considering the site circumstances, that the site is cleared and unencumbered and the design and capacity work that has already been carried out.

16. The Wi1 site is allocated for a range, and potentially a mix of uses. Against that background, what is the justification for the varying residential capacity estimates given in the Plan and in the 5 Year Supply Proforma?

Council response

7.61. The capacity for Site Wi1 as set out in Merton's Local Plan Regulation 19 July 2021 was based on initial capacity assessments for this 1ha site for residential schemes and achieved a range of 51-73 homes. Further detailed site specific capacity work looking at similar scale, massing and housing types found in the local area concluded with a range of 70 to 103 homes. The council therefore proposes the following Main Modification to the Local Plan page 277 to align the site's capacity between the Local Plan and the five year land supply.

Proposed Main Modification

277	Site Allocation Wi1	Indicative site capacity (new homes): 50-70 -1035 new homes	Effectiveness	May 2022-response to the inspectors' questions
-----	---------------------	--	---------------	--

17. The planning permission for the Wi15 YMCA makes provision for 135 dwellings, however, the Five Year Supply Proforma anticipates the delivery of 145 dwellings on the site. What is the justification for the higher figure?

Council response

7.62. The 145 homes included for this site in the five year supply pro-forma is a typographical error. This should be 135 homes as stated in the Local Plan and in planning application 20/P1738. Please accept our apologies for this.

18. Are there any further updates on the progress of the planning application relating to the RP6 LESSA Grand Drive site? Is there an updated position on the allocation or emerging proposals from Sport England following the objection made at Regulation 19 stage?

Council response:

7.63. Planning application 21/P4063 is currently being assessed by the council's development control team. It has been subject to public consultation and is currently scheduled to be considered at the Merton Planning Applications Committee on 16 June 2022.

7.64. Sport England's Regulation 19 representation to the Local Plan was received on 3 September 2021, whereby Sport England raised an objection to site allocation RP6 coming forward for housing. While discussions have continued on the planning application, the council understands that Sport England's overall position in relation to this site allocation has not changed.

19. Although "active discussions" are ongoing with potential developers of the Mi19 Worsfold House site, the disposal of this Council-owned site is yet to take place, and no planning permission is in place relating to its residential redevelopment. Are there any further updates on these matters; and has the delivery phasing been informed by the average times for receipt of an application to completion of development set out in the 'Housing Delivery Study'⁷¹?

Council response

7.65. The delivery of homes at the Worsfold House site by 2025 has been informed by the pre application dialogue on the site, the site capacity work carried out as part of the One Public Estate programme and then in more detail and engagement with the housebuilding industry. The council has had regard to the average times for application to completion of development as set out in 11D6 Merton's Housing Delivery Study.

⁷¹ In particular those in Table 6.3 relating to 50-99 Units

20. According to the Five Year Supply Proforma, the council-owned Mo1 Chaucer Centre site is to be disposed to a housing developer with anticipated completion of this in Summer 2022. No extant planning permissions are in place relating to residential redevelopment of the site. Are there any updates on these matters?

Council response

7.66. No, there is no further update since the Housing Supply Pro-forma was submitted in March 2022.

21. Has the delivery phasing of the Mo1 site been informed firstly, by the average timescales for receipt of an application to completion of development set out in the 'Housing Delivery Study'⁷²; and secondly, the need to either deliver a mixed-use development, or provide the existing facility elsewhere in the Borough as set out in the allocation?

Council response

7.67. Yes, the delivery phasing for Chaucer Centre ([site Mo1 in 0D1 Merton's Local Plan Stage 3 Regulation 19 July 2021](#) and proposed via a Main Modification to become site Mo4) for 2025/26 has had regard to the average timescales for development as set out in Chapter 6 of [11D6 Merton's Housing Delivery Study](#). This indicates that the average timescale for a scheme of 50-99 homes from registration to completion is 3.9 years / 44 months.

7.68. This site's delivery timescale has also been informed by the council's ongoing review of its assets and scope for re-providing the services currently on site in other parts of the council's estate and by the design and viability work that has already been carried out.

22. What is the significance for the capacity of the Mo1 site of the initial viability and capacity work which relates to the retention, conversion and extension of the existing building?

Council response

7.69. The initial viability work assumes that the building would be retained which would give a capacity of around 45 homes. If further detailed work was to be carried out with a particular residential proposal, this may result in development proposal at the top end or bottom end of the range specified within the Local Plan of 35-65 homes.

⁷² In particular, those set out in Table 6.1 relating to schemes of 50-99 units

23. Would the Mo1 be a suitable site for a tall building based on the prevailing character of the area?

Council response

7.70. The Chaucer Centre ([site Mo1 in 0D1 Merton's Local Plan Stage 3 Regulation 19 July 2021](#)) and proposed via a Main Modification to become site Mo4) is not considered suitable for a tall building.

7.71. On 2nd March 2022, the council submitted LBM01 as a response to the Inspectors' Preliminary letter. Within LBM01 the council proposed a Main Modification to change the former site Mo4 (Morden regeneration) to be called Site Mo1 and for the former Site M04 (Chaucer Centre) to be called Site Mo1

7.72. The two images below show these proposed modifications:

Site ~~Mo4~~Mo1: Morden Regeneration Zone

SITE ~~Mo4~~Mo1: Chaucer Centre Canterbury Road, Morden, SM4 6PX

7.73. The council would like to clarify that the approach is for Morden Regeneration Zone (now Site Mo1 subject to Main Modifications) to accommodate tall buildings but not for the Chaucer Centre (now site Mo4 subject to Main Modifications). It may be that more recent evidence submitted in March 2022 refers to "Mo1" being suitable for tall buildings, meaning Morden Regeneration Zone.

24. Overall, to what extent can there said to be clear evidence, which justifies the inclusion of Mo1's anticipated site yield within five-year supply estimates?

Council response

7.74. The council believes that there is clear evidence which justifies the inclusion of the Chaucer Centre (Site Mo1, now proposed to be Site Mo4 subject to Main Modifications

7.75. The council has undertaken initial capacity and viability work during the production of Merton's Local Plan to inform site disposal of the Chaucer Centre and other public sector sites. This work was funded by the One Public Estate programme.

7.76. Subsequent to this, the council has also invested further in carrying out more detailed architectural and capacity studies on the Chaucer Centre. This work, and the One Public Estate work, has not been submitted to the Local Plan examination library as it is confidential to inform the council's disposal and retention strategies.

7.77. The building is occupied by the council and is used largely as a meeting venue for hire (see Chaucer Centre rental website). As it is owned and managed by the council, with relatively limited occupation, the council has control of decisions on disposals.

25. According to the Five Year Supply Proforma, the council-owned Mo7 Gifford House site is to be disposed to a housing developer with anticipated completion of this in Summer 2022. No extant planning permission appears to be in place, and the building is currently occupied by a tenant. Are there any further updates on these matters?

Council response

7.78. There are no further update on these matters since the housing supply proforma was submitted to the Inspectors in March 2022. Gifford House is council owned; has been assessed for capacity and viability by the council and is proposed to deliver 24 homes towards the end of the first five years of Merton's Local Plan. Chapter 6 of [11D6 Merton's Housing Delivery Study](#) sets out that schemes of up to 24 homes take on average 35 months (2.9 years) from planning application registration to completion.

26. According to the Five Year Supply Proforma pre-application engagement on the Hoo Hing Elbrook site is yet to commence. Whilst the owner's intent to redevelop the site for residential purposes is noted, how have the timescales set out in the 'Housing Delivery Study', and the requirement to relocate, either temporarily or permanently, existing businesses, informed the anticipated delivery phasing?

Council response

7.79. The council has contacted the representatives of the Hoo Hing, Elbrook Chak89 site and as no further progress has been towards submitting a planning application the council propose to remove the site from the first five years of Merton's housing trajectory at this time.

27. The Five Year Supply Proforma indicates that disposal of the Caxton Road Depot and Workshop for residential development is "subject to Met Police declaring site surplus to operational requirements".

When is a decision on this matter anticipated?

Is the suggested delivery phasing of the site justified given firstly, the apparent lack of firm commitment on the part of the Metropolitan Police to dispose of the site; secondly, that there is as yet no outline or detailed planning proposals for its residential development; and thirdly, that a residential developer is yet to be identified?

Council response

7.80. In June 2021 the Mayor's Office for Policing and Crime (MOPAC) identified 22-24 Caxton Road as one of the sites identified as surplus in the MOPAC Draft Estates Strategy (2020-2025) and resolved it for disposal. ([link to MOPAC disposals report June 2021](#))

- 7.81. On 25th October 2021 MOPAC sold 22-24 Caxton Road and stated in their report that the expected new use was residential ([link to MOPAC report confirming sale March 2022](#))
- 7.82. The suggested delivery phasing of the site to be delivered in 2026/27 is justified as MOPAC sold the site for residential in 2021 and the average delivery timescales identified in [11D6](#) for sites of 49 homes or less is 39 months / 3.25 years.

Issue (iv) Does the Plan optimise the potential for housing delivery on all suitable and available brownfield sites⁷³?

- 1. Following on from M7,I(iii),Q2(f) above, is the anticipated site capacity for Mi1 Benedict Wharf justified, given that the boundary of the allocation appears to be different to the site boundary relevant to the related planning application (19/P283)?**

Council response

- 7.83. Yes, the anticipated site capacity for Mi1 Benedict Wharf is justified. The boundary of the allocation extends to Church Road to the north and includes the public highway at Hollowfield Way and other council-owned land connecting the site entrance with Church Road. It is not intended that this single entrance public highway at Hollowfield Way provide new homes; planning permission 19/P2383 provides highways and other landscaping improvements in this area.

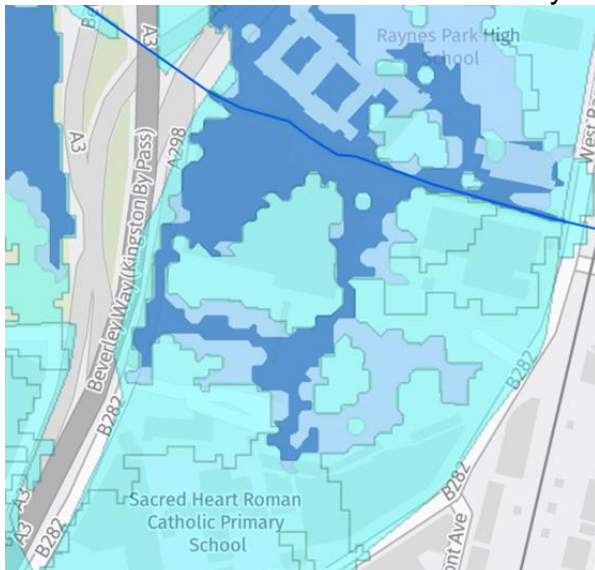
- 2. Following the grant of planning permission pursuant to planning appeal ref: APP/T5720/W/20/3250440 does site allocation RP3 optimise the potential for housing delivery on this brownfield site? What effects would the site's flood zone and other designations, accessibility and infrastructure requirements have on its capacity?**

Council response

- 7.84. In June 2021 planning permission (ref 19/P2387) was granted on appeal for 456 new homes on part of Site Allocation RP3. The indicative site capacity proposed in OD1 Merton's Local Plan stage 3 Regulation 19 is for 300-460 homes. The site boundary for the Site Allocation RP3 extends over the whole Tesco site and car park; larger than the site boundary for planning permission 19/P2387.
- 7.85. There is scope to provide new homes across the wider site. However this is subject to the site's availability for housing and at present, Tesco is occupying the site as a Tesco Extra store and car park. It is also subject to overcoming constraints such as the flood risk designations. Modelling undertaken for Merton's Strategic Flood Risk Assessment as seen in the extract from [submitted document 15D7](#) below demonstrates that the western part of the site is partly within fluvial

⁷³ Per Policy H1(B)(2) of the London Plan – NB questions about optimisation of land in relation to industrial sites is covered in respect of Matter 7, Issue (ii) below

flood risk zones 2 and 3 of the Beverley Brook and partly within flood zone 2.



7.86. Merton's SFRA also identifies the whole site as at low risk of surface water flooding with a small pocket to the south at high risk.

7.87. In line with [0D32 London Plan policy D3](#) it may be possible to optimise site capacity through a design led approach; however the site's constraints in terms of flood risk and proximity to the A3 road may not significantly increase site capacity.

3. Does the appeal decision have any significance for the approach to other sites within the Raynes Park area such as site RP4?

Council response

7.88. As a planning application has not been submitted or determined on Site RP4 80-86 Bushey Road, Raynes Park SW20 0JW, it is not possible to say whether the appeal decision APP/T5720/W/20/3250440 (dated 2021) for Site RP3 Tesco Burlington Road would have any significance to any future approach to RP.4.

Issue (v) is the capacity of small sites and any windfall allowance based on compelling evidence that these will form reliable sources of supply⁷⁴; and is the Plan positively prepared and in general conformity with the London Plan in these terms⁷⁵?

1. Is the amount of supply anticipated to come via windfalls in the proposed revision to the housing trajectory in the Council's suggested MMs justified?
2. Is the Plan positively prepared in terms of meeting the housing requirement given the proportion of overall supply anticipated to come forward through windfalls – particularly as the five-year supply is to be made up of “specific, deliverable sites”, and “specific, developable sites” are to be a component of the supply over the rest of the plan period (with our emphases)? Is development genuinely plan-led in these terms?

Council response

7.89. Yes, the amount of supply anticipated to come via windfalls in Merton's housing trajectory is justified.

7.90. Paragraph 71 of the NPPF states “

Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

7.91. The NPPG paragraph 3-023-20190722 states:

How should a windfall allowance be determined in relation to housing?

A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 [paragraph 71 of the NPPF 2021] of the National Planning Policy Framework.

Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance (using the same criteria as set out in paragraph 67 of the National Planning Policy Framework).

7.92. As stated in 11D6 Merton's Housing Delivery Study and elsewhere, Merton is a borough of small sites due to its previously developed character, fragmented land ownership and high south-west London land values making site assembly unviable. Paragraph 4.20 of Merton's Housing Delivery Study states that over the last fifteen years, small sites (of less than 10 homes) have accounted 97% of planning applications approved for new homes in Merton, totalling 62% of housing

⁷⁴ Per paragraph 71 of the Framework

⁷⁵ In particular, paragraph 4.1.8

delivery. It also explains that small sites across Merton contribute only 2.4 homes per application on average.

- 7.93. [Merton's Housing Delivery Study \(11D6\)](#) also sets out timescales for delivery, again based on extensive analysis of historic delivery rates as required by the NPPF. Between 2005 and 2020 the average timescales for a 0-24 home scheme was 35 months from planning application registration to decision, just under three years. More detailed analysis of minor development trends in the same 15 years between 2005 and 2020 demonstrates that the minor residential developments (i.e. sites of 10 homes or less) can take less than a year from development start to completion.

Table showing average timescales from start to completion

	Change of use	Conversion	Extension	New Build	Average
0-10 UNITS	337 days	341 days	389 days	545 days	403 days
0-10 UNITS	(0.9 years)	(0.9 years)	(1.1 years)	(1.5 years)	(1.1 years)

- 7.94. As many small sites don't need to engage in extensive pre application discussions with the council before submitting an application, the council is not always aware of small site proposals for new homes before they are submitted.
- 7.95. [11D2 London Strategic Housing Land Availability Assessment](#) placed an emphasis on small sites delivery to help meet London's housing needs and this is echoed in OD32 the London Plan. 11D2 the London SHLAA noted that historic development trends in London had 38% of London's homes being delivered on small sites (defined as less than 0.25ha). Chapter 6 of 11D2 the London SHLAA explains the approach taken to estimate housing capacity on small sites and outlines how different approaches have been examined based on windfall assessments across different timescales and a modelled approach which has sought to estimate the potential impact of policy changes in the new London Plan, specifically Policy H2 "small sites" and a new presumption in favour of small sites.
- 7.96. As it is a fundamental characteristic of housing delivery in Merton, Merton also has a positive approach to small sites development. In 2012 Merton published a [Small Sites Toolkit \(12D2\)](#) as a supplementary planning document to drive up the quality of small developments. In line with London Plan policy H2 on small sites, the council also published Merton's Borough Character Study (12D1) in 2021 to help inform local character.
- 7.97. Based on historic delivery rates of small sites in Merton, an annual capacity of 261 homes to be delivered on small sites was included in the London SHLAA in setting Merton's housing target. This is set out as 2,610 homes in [OD32 London Plan Table 4.2](#) "10 year targets for net housing completions on small sites". Merton's small sites allowance is only included from Year 3 of Merton's housing trajectory onwards as small sites in the first two years can be specifically identified via planning and development records. From year 3 onwards, the annual windfall allowance of 261 homes per year is included as Merton's contribution to small sites. The table below is based on development rates for Merton looking back over 5, 10 and 15 years from 2020 and demonstrates that, should historic

development trends continue, Merton is likely to exceed its small sites target, particularly with the new policy and guidance supporting small sites development

Table showing number of homes built on small sites in Merton over time

GLA small sites target	261 homes	100%
15 year average delivered on small sites	269 homes	103%
10 year average delivered on small sites	271 homes	104%
5 year average delivered on small sites	359 homes	138%

*2020 baseline

7.98. Therefore Merton's Local Plan is positively prepared, seeking as a minimum to meet the area's objectively assessed needs, based on the London SHLAA and the London Plan, particularly policy H2. The plan's approach is based on compelling evidence in line with the NPPF paragraph 71: this includes extensive analysis of Merton's historic windfall delivery rates over a 15-year period, included within the London-wide strategic housing land availability assessment, and considering expected future trends given the policy and guidance to support small sites development.

7.99. The approach is also justified by detailed analysis of the time taken to go through the planning application process, for developers to consider starting on site and for the completed construction of developments in Merton. Merton's approach to small sites is plan-led and an appropriate strategy taking into account the reasonable alternatives. While Merton's Local Plan contains site allocations that are less than 0.25ha and in some cases have capacity for less than 10 homes (e.g. Site Allocation CW1 Baltic Close: 0.02ha with an indicative site capacity of 1-4 homes), it would not be reasonable or effective to try and allocate or identify all specific small sites in Merton. Finally, the approach to the inclusion of small sites windfall allowance within the first five years of the housing trajectory is common across London as it is supported by the London SHLAA and is a component of the London Plan target for each borough, thus in general conformity with the London Plan.

APPENDIX 1 – MATTER 7

From: Planning Policy
Sent: 08 April 2022 11:30
To: Planning Policy; Valerie Mowah; DELTA
Cc: Tara Butler
Subject: RE: Merton's Housing Delivery Test (HDT) figures

Dear Valerie,

Thank you for contacting us about the difference between the London Borough of Merton's 2019/20 requirement figures in the 2020 and 2021 Housing Delivery Test (HDT).

To answer your question below about the difference in housing requirements for 2019/20, it is because the 2021 HDT uses the 2021 London Plan as the housing requirement source, whereas the 2020 HDT uses the 2016 London Plan.

As the new London Plan was adopted on 2 March 2021 and backdated to 1 April 2019, both plans are valid in 2019/20 for the purposes of the 2021 HDT but only the 2016 plan was valid in 2020's HDT. The 2021 London Plan takes precedence in the 2021 HDT even though Merton's figures in the 2016 London Plan are lower compared to what is stated in the new 2021 plan (411 but reduced to 377 when the COVID-19 adjustment is applied, and 918 respectively).

The 2021 London Plan takes precedence in line with Paragraph 17 in the Housing Delivery Test rulebook which states:

"For the purposes of calculating the Housing Delivery Test, the new adopted housing requirement will apply from the start of the relevant plan period (set out in the strategic policies for housing), which may be earlier than the adoption of the strategic policies".

Here is a breakdown of the calculations for 2021 HDT in regard to 2019/20 housing requirement figures:

- London 2021 plan with covid adjustments: 840
- $918 * 335/366$
- LHN with covid adjustments: **526**
- $575 * 335/366$
- Lower of policy means that Merton uses LHN

As the minimum local housing need figure (526) is lower than the 2021 London housing requirement figure for the year 2019/20 (840), the 'lower of' policy means that the local housing need figure (526) is used as the requirement figure.

For further clarification, we have attached a full breakdown of Merton's 2021 Housing Delivery Test measurement. We hope this clarifies any confusion and thank you for your patience.

Kind regards,



Department for Levelling Up, Housing & Communities

Planning Policy

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Merton Council: Housing Delivery Test 2021 calculation breakdown

‘Homes Required’

Paragraphs 12 to 15 of the Housing Delivery Test Rule Book set out how the homes required is calculated. In summary, this is largely dependent on the age of the plan during any given monitoring period. The 2021 Housing Delivery Test (HDT) is calculated using data from financial years 2018/19, 2019/20 and 2020/21, details are set out below.

Plan Information

	Merton Council Core Strategy 2011	London Plan 2021
Adoption date	13/07/2011	02/03/2021
Plan period (start date)	01/04/2011	01/04/2019
Plan period (end date)	31/02/2026	01/03/2029
Housing requirement (per annum)	320	918
Unmet need	0	0
Traveller requirement	0	0
Source policy	Merton’s Core Planning Strategy 2011-2026	The London Plan: The Spatial Development Strategy for Greater London March 2021

Source: Delta return submitted to DLUHC, verified by DLUHC checking plan data

Calculating Local Housing Need using the standard method

Local Housing Need is calculated using 3 steps. For more information on how Local Housing Need is calculated, please see the Planning Practice guidance¹. The Housing Delivery Test Technical Note sets out how this applies to calculating HDT for 2020/21.

Step 1 sets a baseline using 2014 based national household growth projections. Projected average annual household growth over a 10-year period from 2020 (88,501) to 2030 (99,354).

Step 2 adjusts the baseline calculated in step 1 based on the affordability of the area, 14.83.

¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Step 3 caps the level of any increase a local authority can face based on the status of the local plan.

As of 1st April 2020, the local plan was over five years old, so the cap is applied to the projected household growth for the area over the 10-year period identified in Step 1 (1085) as this is higher than the annual average plan requirement.

40% above this figure results in a cap of 1519. The cap is therefore lower than the number identified in Step 2.

This results in a local housing need figure of 1820, calculation shown below.

$$88501 \text{ to } 99354 = 10,853$$

$$10,853 / 10 = 1,085.3$$

$$14.83 - 4 = 10.83$$

$$10.83 / 4 = 2.7075$$

$$2.7075 \times 0.25 + 1 = 1.676875$$

$$1.676875 \times 1,085.3 = 1,819.9124375$$

LHN (uncapped): 1820

The capped figure is lower than the minimum annual local housing need figure and therefore limits the increase to the local authority's minimum annual housing need figure. The minimum figure for this local authority is therefore 1,519.

Calculating the requirement

The 2021 HDT measurement was calculated from data relating to financial years 2018/19, 2019/20 and 2020/21.

As the 2016 London Plan was less than five years old for years 2018 to 2020 the plan is used (subject to the lower-of policy) for the first test year.

As the 2021 London Plan was less than five years old for year 2020/21 but has a backdated plan period which starts on 1 April 2019, the plan is used for the second and third test year (subject to the lower-of policy)².

² In line with Paragraph 17 the [Housing Delivery Test rulebook](#)

	HDT Measurement Year			
	2018/19	2019/20	2020/21	
COVID adjustment (no. days) ³	N/A	31	122	
Annual Average Housing Requirement in Plan (including unmet need and COVID adjustment where applicable)	320	293	213	
Annual Average Housing Requirement in London Plan 2016/2021 (including unmet need and COVID adjustment where applicable)	411	840	611	
LHN (excluding all adjustments)	575	575	1519	
Net unmet need (including COVID adjustment)	0	0	0	
LHN (including unmet need and COVID adjustment)	575	526	1012	
Final ‘homes required’ figure (following application of ‘Lower of’ policy)	<u>411</u>	<u>526</u>	<u>611</u>	<u>1548</u>

'Homes Delivered'

Paragraphs 6 to 11 of the Housing Delivery Test Rule Book set out how the 'homes delivered' is calculated. In summary, this uses 'Housing supply: net additional dwellings statistics'⁴ and an adjustment for student and other communal accommodation. Please note, numbers may not sum due to rounding.

The relevant figures for Merton are shown below:

Year	2018/19	2019/20	2020/21	
Net Additional Dwellings	273	346	643	
National parks adjustment	0	0	0	
Student accommodation adjustment ⁵	0	0	0	
Other communal accommodation adjustment ⁶	-23	0	0	
LLDC adjustment	0	0	0	
Adjusted net additions	250	346	643	
				1239

³ The COVID adjustments reduce the 'homes required' figure by a period of time. For example, due to the impact of the pandemic and first national lockdown in the 2019/20 monitoring year, the HDT 'homes required' figure was reduced by one month. In the calculation, this is expressed as a number of days for accuracy.

⁴ <https://www.gov.uk/government/collections/net-supply-of-housing>

⁵ Net student communal bedspaces divided by 2.5 national average, where applicable.

⁶ 2018/19 net other communal bedspaces: -41 divided by 1.8 national average = -22.77777777777778

Total delivery	Total requirement	HDT result
<u>1239</u>	<u>1548</u>	<u>80%</u>

Final HDT result = 80%

I hope the above makes it clear how the 2021 Housing Delivery Test was calculated and answers your questions. However, if you identify numbers that you were not expecting in the above data, please specify which figures this relates to and the figures you believe should be used. To support this, it would be helpful if you could also send weblinks to any documentation where such figures are referenced.

We will consider the information you provide and will endeavour to respond in due course.

Kind regards,

Planning Policy Team

**Draft Statement of Common Ground between
London Borough of Merton and
St William Homes**

**On draft policies D12.6 and Mi16 of the
Merton Local Plan Review**

Areas of agreement

- Mitcham Gasworks site (Mi16) is suitable for tall buildings and the reference in the draft site allocation Mi16 to the potential for taller buildings is agreed
- The inclusion of Mi16 within draft Policy D12.6 relating to tall buildings is agreed
- The initial townscape evidence demonstrates that heights of up to 10 residential storeys would be acceptable subject to consideration of design policies
- The townscape evidence includes the inclusion of a telecom mast on top of a 10 storey residential building as a replacement of the existing telecoms mast on the Gasworks site (existing height of c.65m). The replacement telecoms mast needs to be located on top of the tallest building in order to provide a clear signal.
- An indicative massing with heights responding to context at the edges and rising to up to 10 storeys would provide c.55,000sqm of floorspace (gross internal area), which gives an indicative capacity of c.650 homes, based on net internal area average of 65 sqm, along with associated spaces such as circulation, plant, and ancillary residential facilities.
- Evidence to support heights of 10 storeys and capacity of c.650 homes is included in the initial townscape assessment included at **Appendix A**

Proposed edits to wording

Mi16 Mitcham Gasworks:

Indicative site capacity: ~~450~~ **Around 650** new homes

Approach to tall buildings: A mixed-use redevelopment of the site could include taller buildings of up to ~~9~~ **10** storeys, subject to consideration of design policies, **along with a replacement telecoms mast on top of the tallest building**

Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed for London Borough of Merton by:

Name – James McGinley

Job Title – Assistant Director for Sustainable Communities

Signature - 

Date – 20 May 2022

Signed for on behalf of St William Homes by:

Name – Lucy Bird

Job Title – Planning Director

Signature - 

Date – 20 May 2022

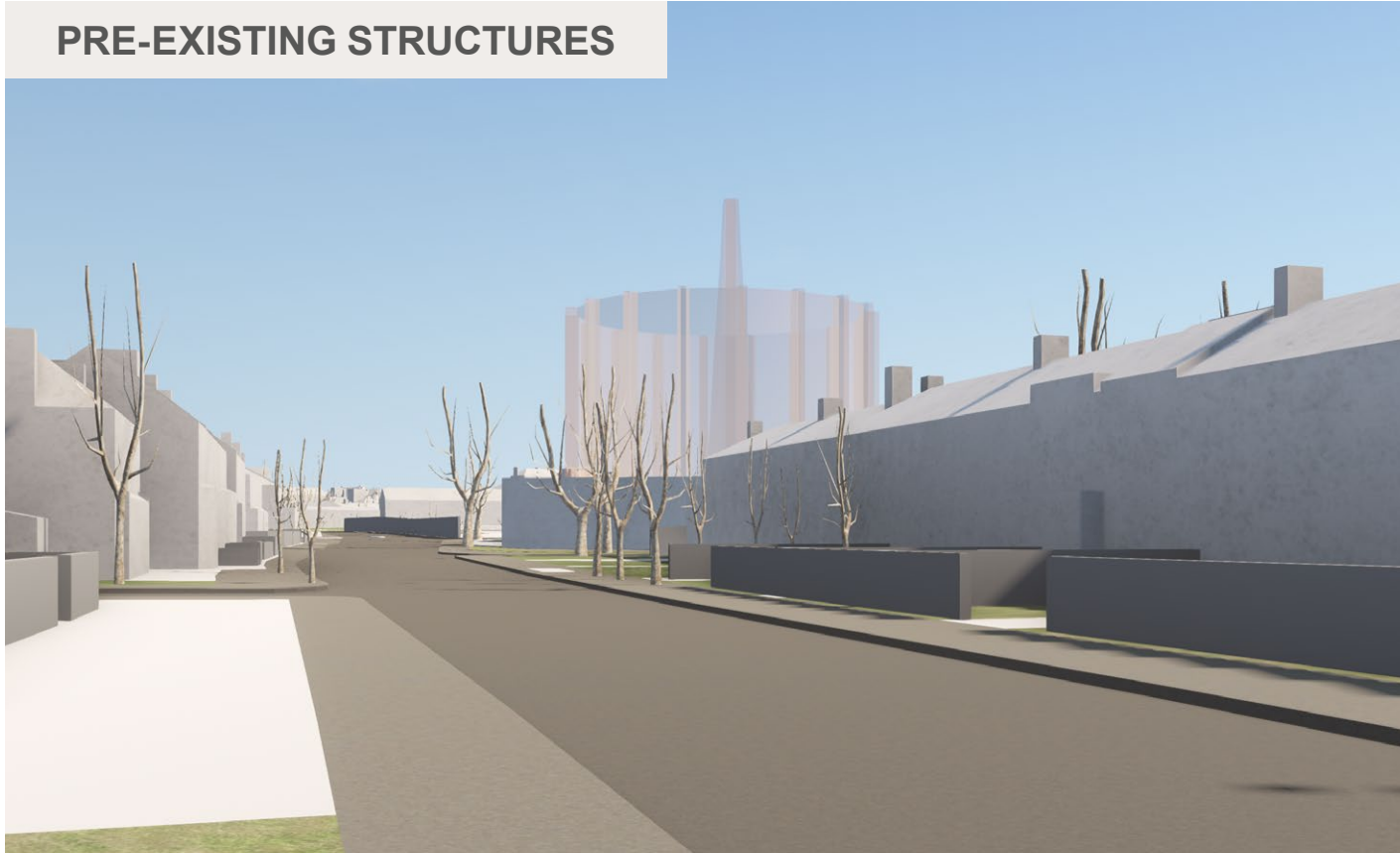
APPENDIX A | MITCHAM GASWORKS MI16

Indicative massing to help form evidence base for site allocation

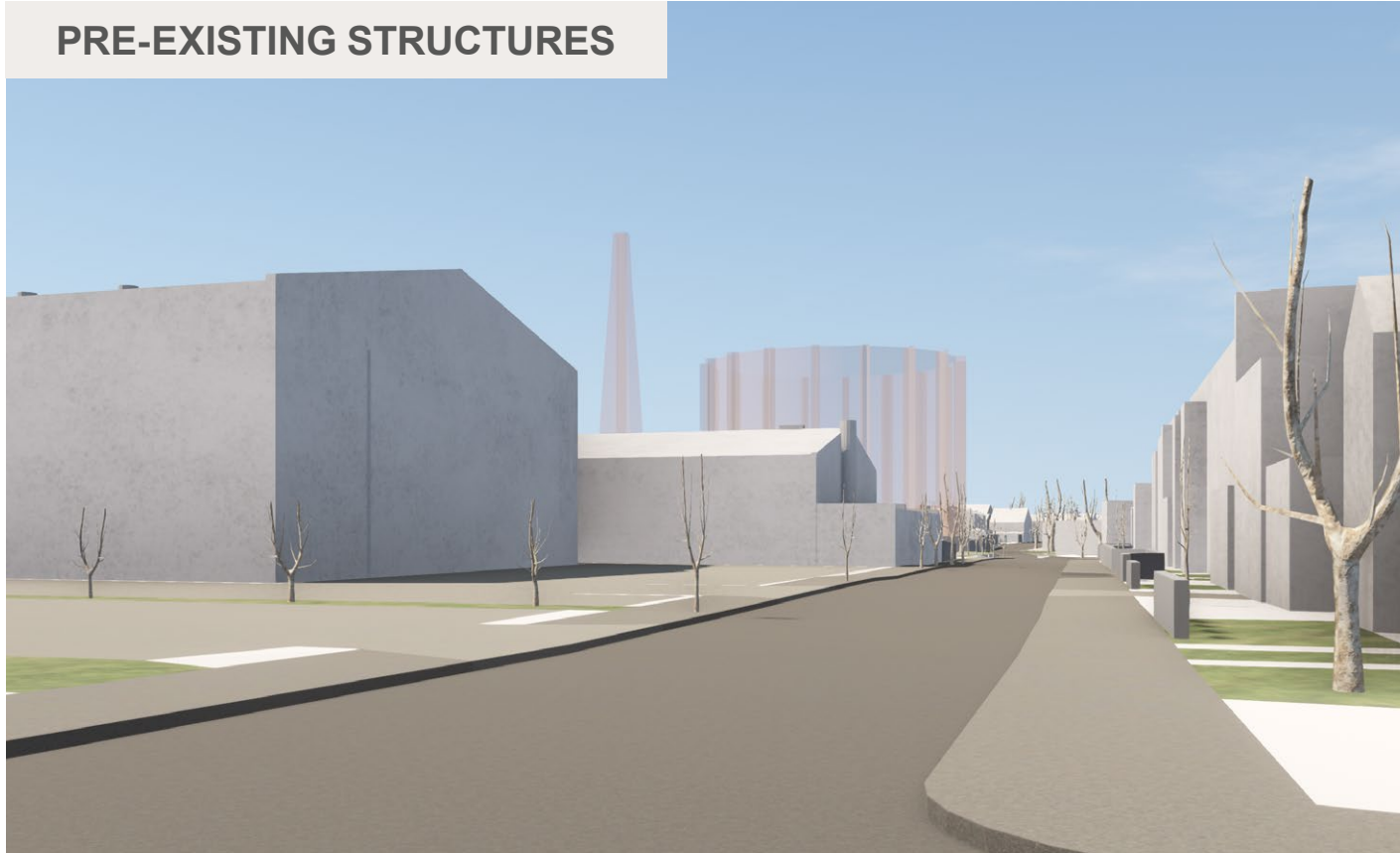
VISUALISATIONS | WESTERN RD (NEAR LAVENDER AVENUE)



VISUALISATIONS | WESTERN RD (NEAR LIBERTY PRIMARY)



VISUALISATIONS | BOND ROAD (NORTHERN PAVEMENT)



VISUALISATIONS | HOLBORN WAY TAKING IN EAGLE HOUSE



VISUALISATIONS | WESTERN ROAD (EASTERN PAVEMENT)

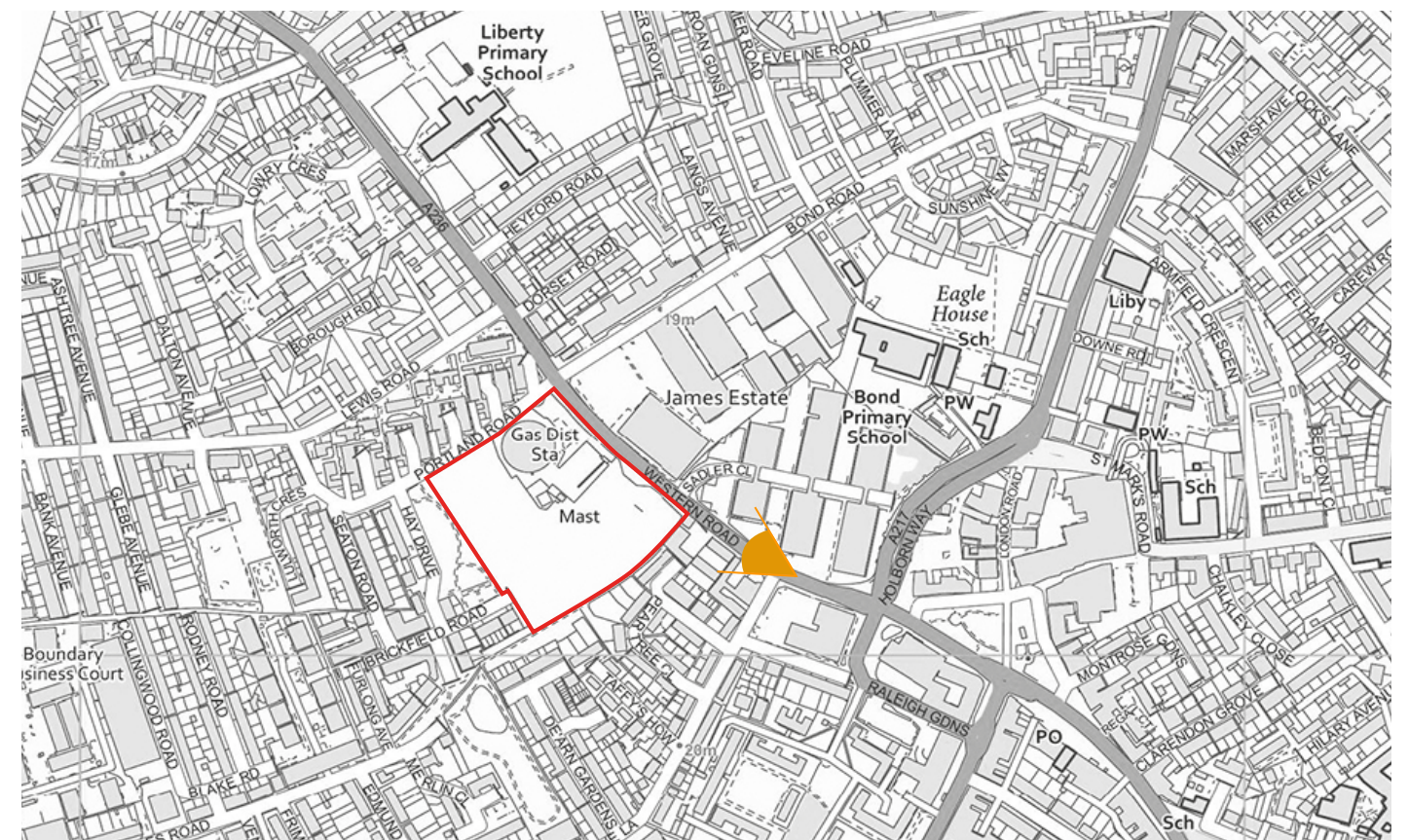
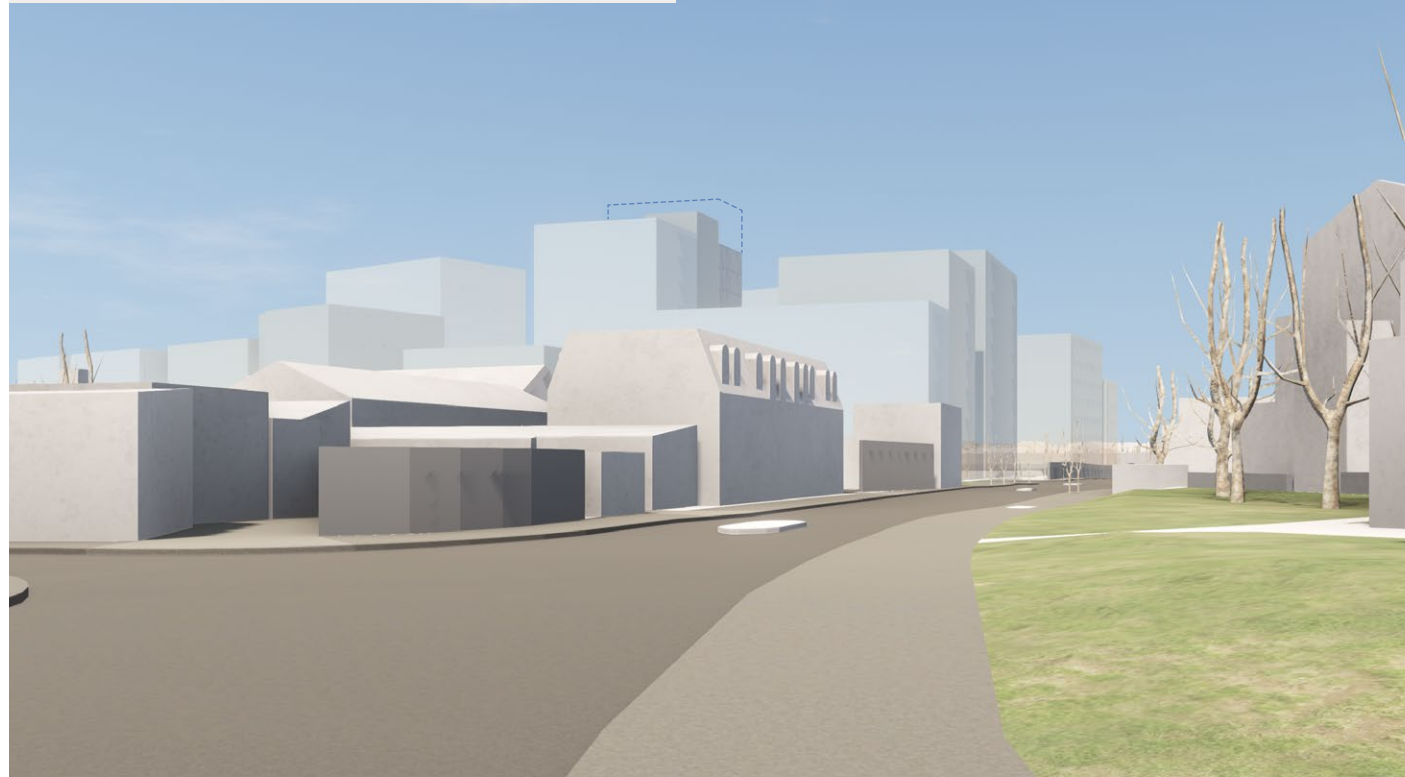
PRE-EXISTING STRUCTURES



EXISTING

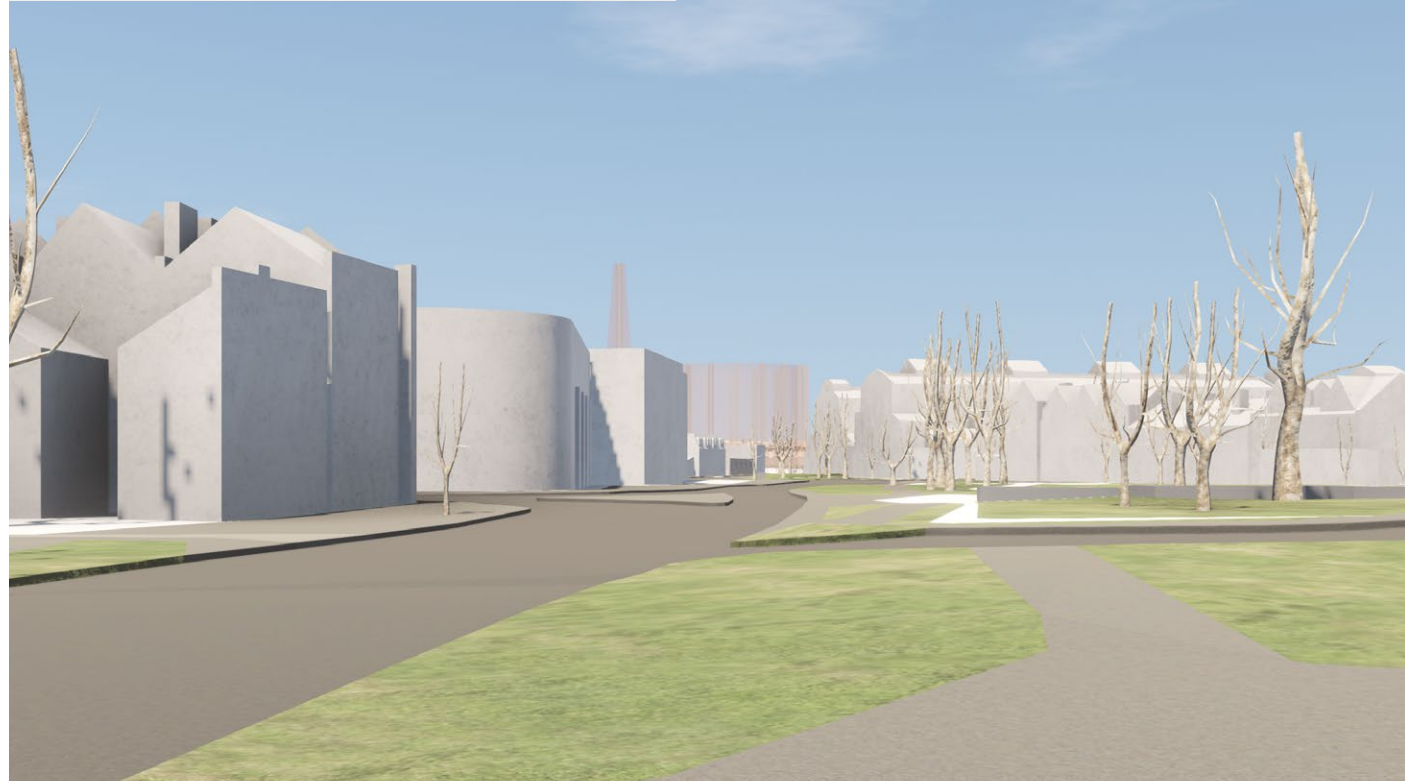


INDICATIVE 10 STOREY SCHEME



VISUALISATIONS | UPPER GREEN EAST

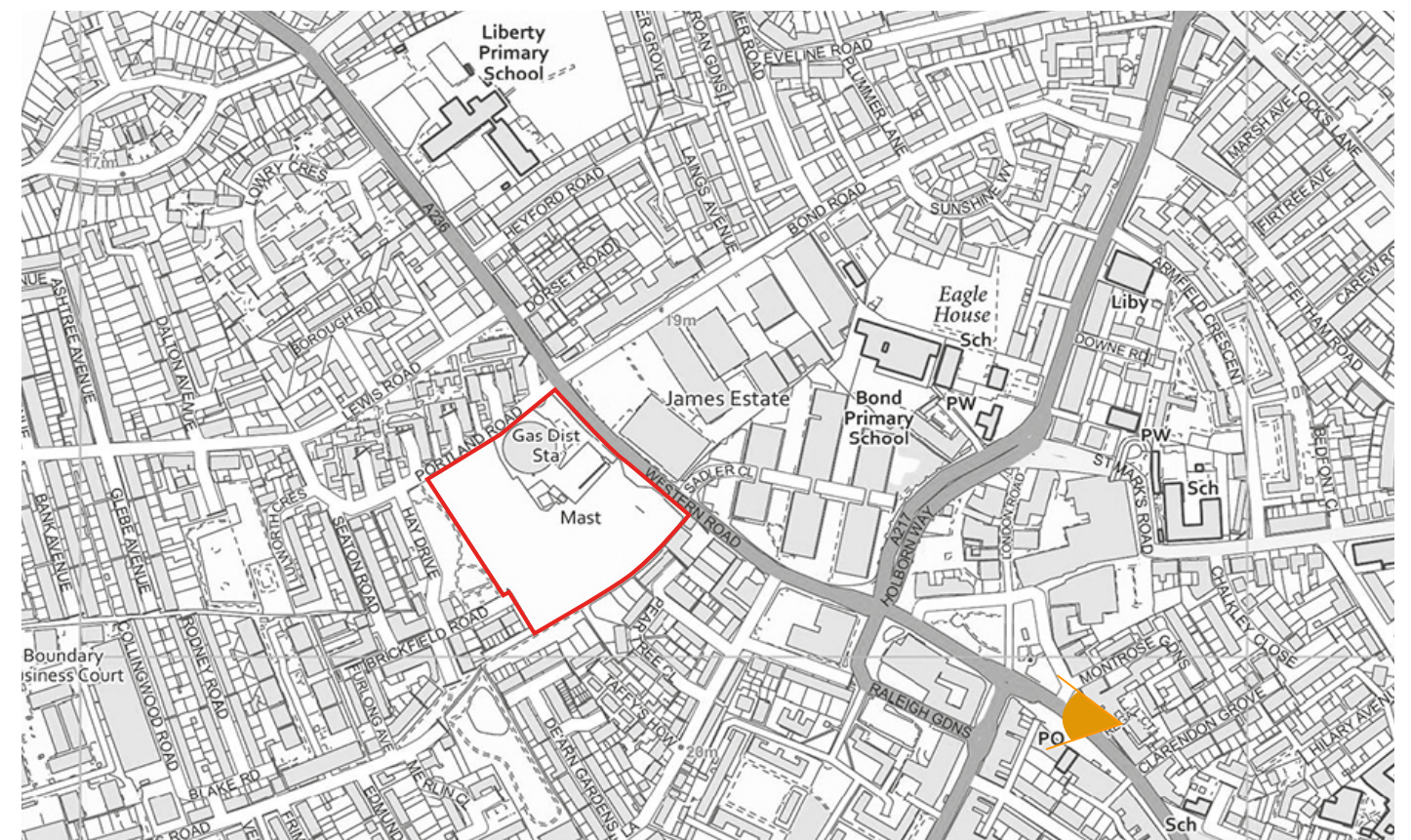
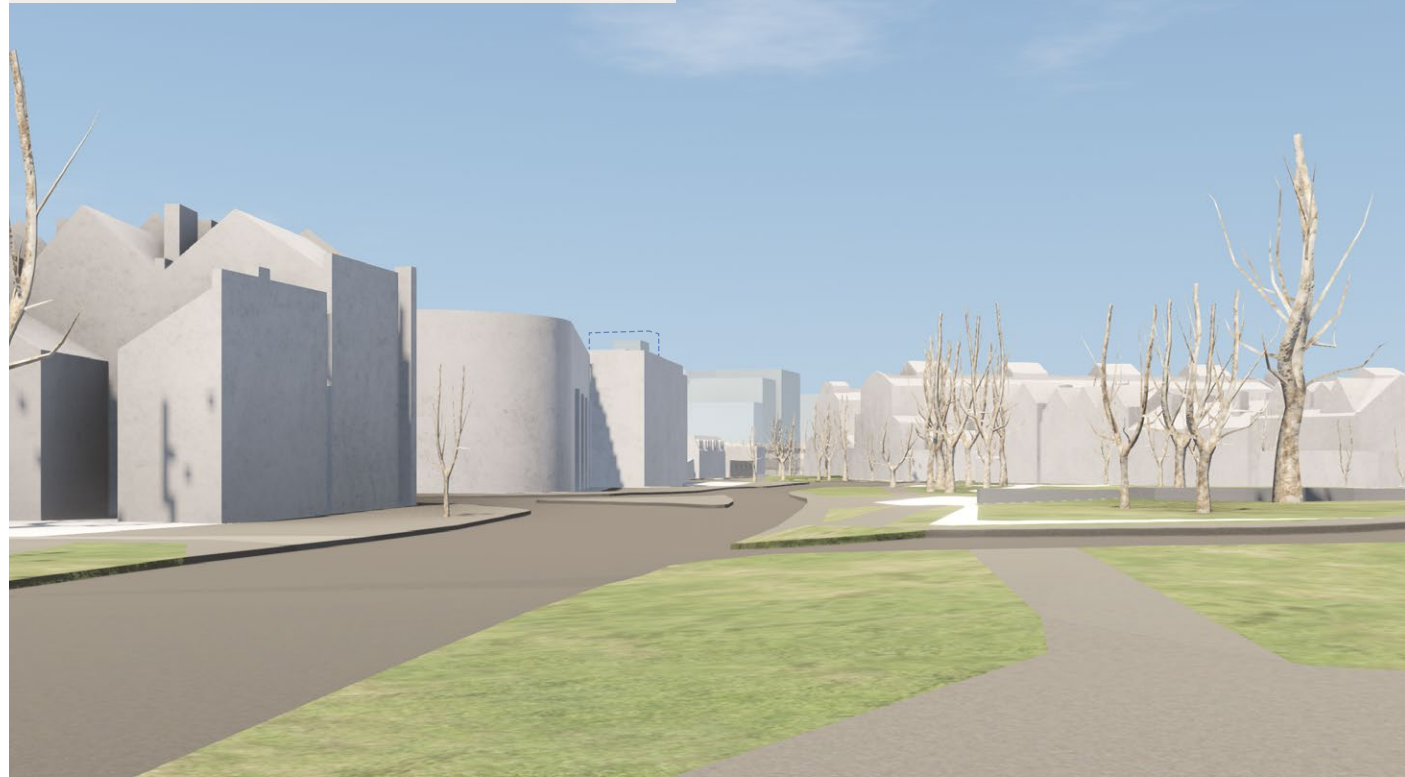
PRE-EXISTING STRUCTURES



EXISTING



INDICATIVE 10 STOREY SCHEME



VISUALISATIONS | LEWIS ROAD (NORTHERN PAVEMENT)



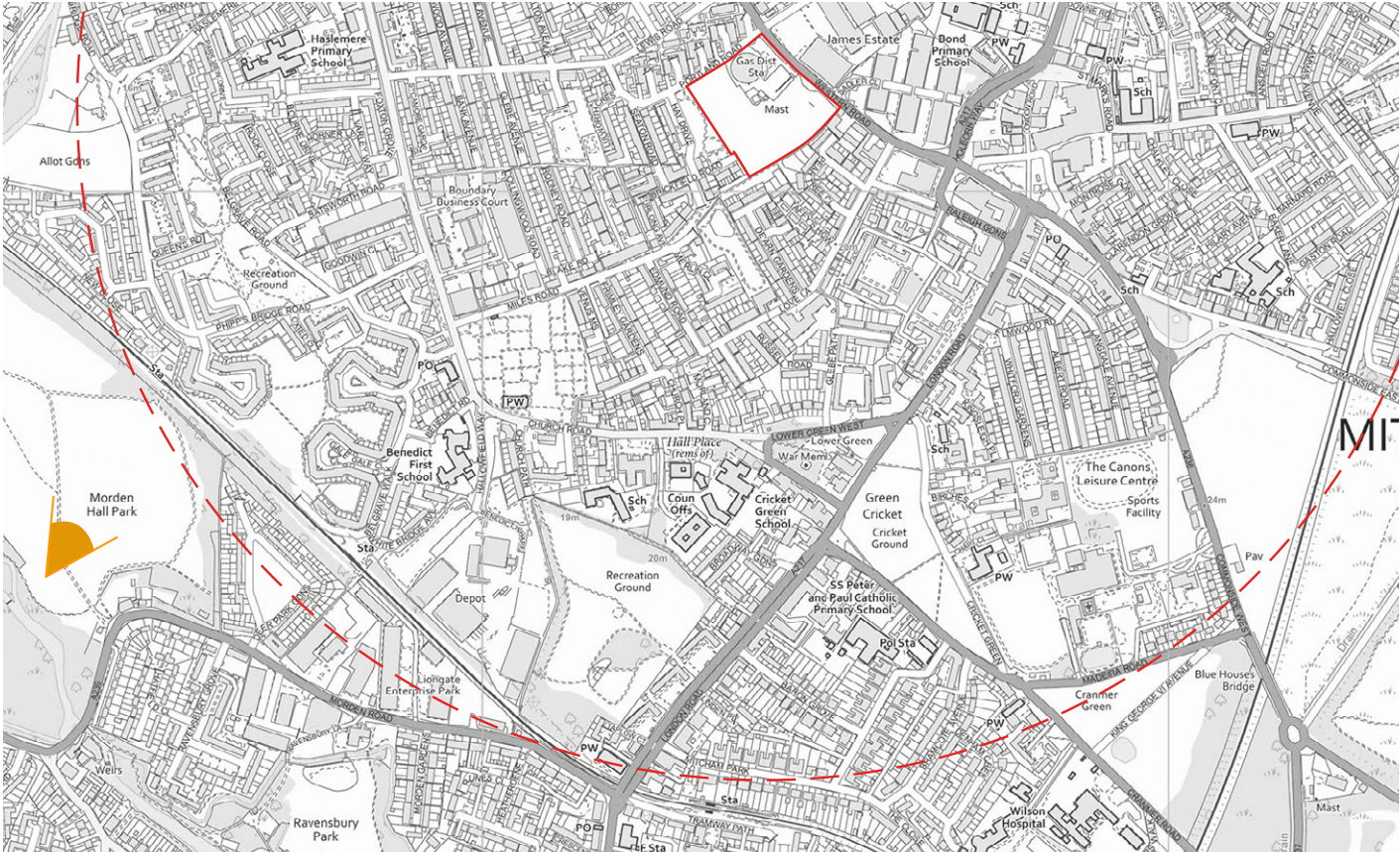
VISUALISATIONS | BRICKFIELD ROAD



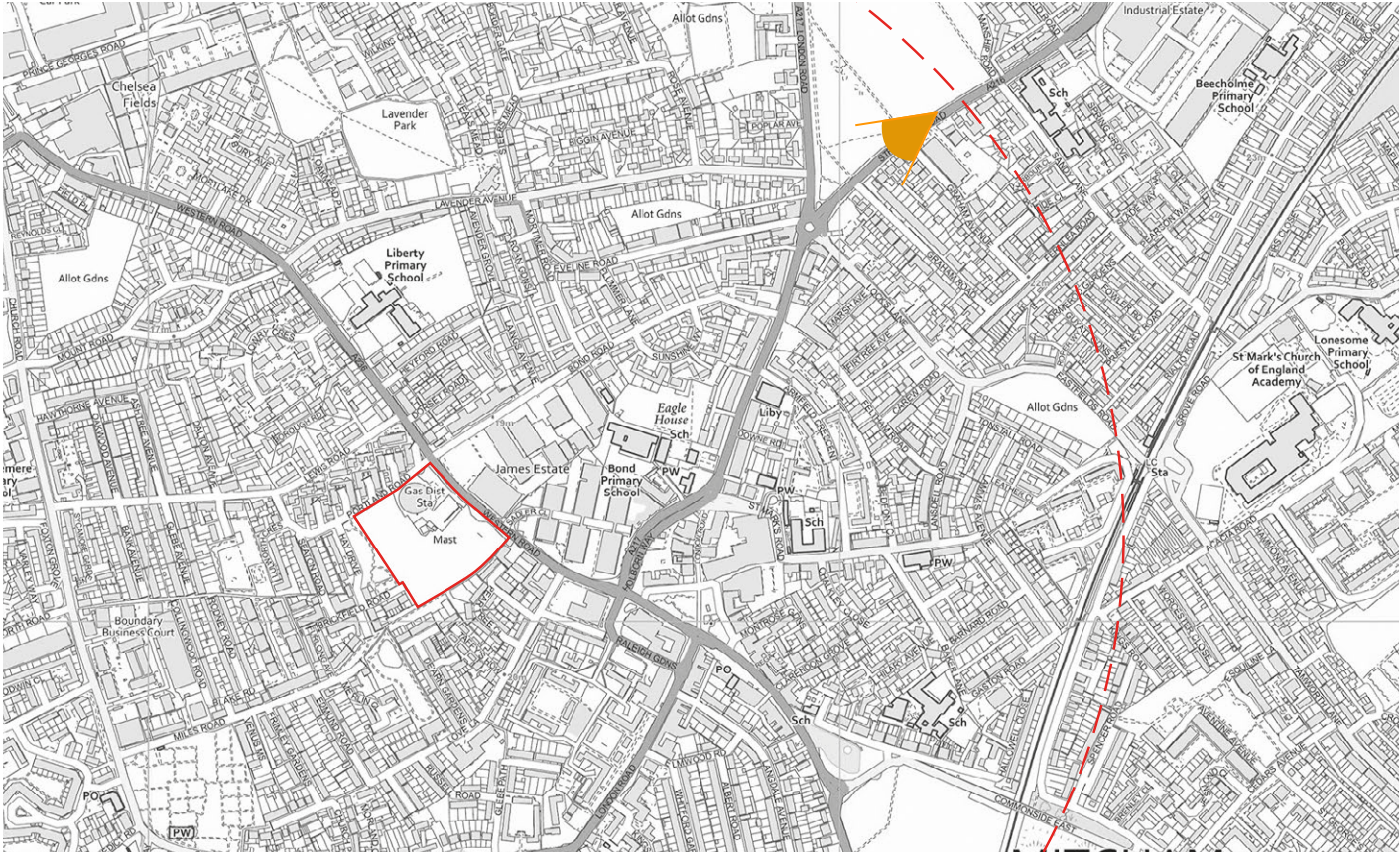
VISUALISATIONS | MITCHAM CRICKET GREEN



VISUALISATIONS | MORDEN HALL PARK



VISUALISATIONS | FIGGES MARSH



VISUALISATIONS | THREE KINGS POND

