

20 May 2022



Inspector R J Aston BSc (Hons) DipTP MRTPI and
Inspector G J Fort BA PGDip LLM MCD MRTPI
c/o Carmel Edwards, Programme Officer

Gregory Evans
E: grevans@savills.com
DL: +44 (0) 207 409 8024

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

By email only to: programmeofficer@carmeledwards.com

Dear Inspector Aston and Inspector Fort

**Written Statement to the Matters, Issues and Questions (MIQs)
Stage 1 Hearings of the Examination of the London Borough of Merton's Local Plan
Response to Matter 7, Issue (iii) Question 19 Relating to Site Allocation RP6 LESSA Grand Drive site**

We write on behalf of our client Bellway Homes Limited (South London) (Bellway) to provide a written statement to the Matters, Issues and Questions (MIQs) Stage 1 Hearings updated 22 April 2022 for the examination to the Merton Local Plan.

This written statement follows representations previously submitted by Savills on behalf of Bellway to the London Borough of Merton supporting the inclusion of the LESSA Grand Drive Site (allocation RP6) as a housing allocation within the Local Plan.

Background

The LESSA Grand Drive site allocation RP6, was previously submitted by Bellway as part of the Merton Local Plan 'Call for Sites' in January 2018, promoting the site for residential use. Representations were also made in support of the site's allocation for residential use in Merton's New Local Plan Stage 2 (Regulation 18) consultation in February 2019, Local Plan 2020 Stage 2a (Regulation 18) consultation in February 2021, and the Local Plan 2021 Stage 3 (Regulation 19) consultation in September 2021.

Bellway submitted a full planning application at the site in October 2020 (LPA Ref. 20/P3237) seeking to deliver 89 dwellings, including 40% affordable housing, two tennis courts and communal amenity provisions. Following the submission of this application, discussions regarding the principle of development and design proposals at the site have been ongoing between Bellway and Merton officers.

Following feedback to the application submitted in October 2020, in December 2021, Bellway submitted a fresh application (Ref: 21/P4063) at the site to deliver a landscape-led scheme of 107 dwellings, including 40% affordable housing, enlarged areas of open space within the site compared to the previous application, along with two all-weather tennis courts with associated floodlighting, a mini MUGA, equipped children's play area, outdoor mini-gym and trim trail.

The December 2021 application for 107 dwellings is likely to be considered at Merton's June 2022 planning committee with an officer recommendation that the application is approved.

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

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



Written Statement to:

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

QUESTION 19: 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?

The LESSA Grand Drive site Allocation RP6 is located within the Raynes Park area and can provide 107 new homes in a range of sizes along with 40% on-site affordable homes as well as other on-site sporting and communal infrastructure. Significantly, redevelopment of the site for housing will provide financial contributions to be secured through a S106 Agreement to allow investment into identified strategic playing field sites across the borough through off-site investment into priority sports locations, in line with the Action Plan of the adopted Merton Playing Pitch Strategy. This would improve and maintain existing sporting facilities allowing them to continue as viable operations. It will also provide an extension to the Raynes Park Lawn Tennis Club through the provision of two new tennis courts and car parking facilities and a financial contribution towards the resurfacing of the existing courts at the Club.

Sufficient supply and mix of housing sites

The LESSA Grand Drive site is identified in Merton's five-year housing land supply provided by Merton in response to the Inspectors Preliminary Matters (2 March 2022). The site is identified as delivering 107 dwellings in 2026/27. Therefore, the LESSA site forms part of Merton's five year housing land supply. It is also referenced within Merton's most recently published Authority Monitoring Report (2019/20) as a site which contributes to Merton's 5 year housing land position.

LESSA site required for supply of housing for the first five years from adoption

Bellway consider all sites identified for housing delivery in Merton's Local Plan and forming Merton's five-year housing land supply are required to ensure there is a sufficient supply and mix of housing sites available in the borough.

Significantly, the LESSA site is an available and deliverable site. It is identified as a housing site to provide 107 dwellings as part of the required supply of houses for the five years from adoption of the Local Plan and there is currently a live planning application seeking full planning permission to deliver 107 new homes at the site. The planning application is due to be presented with an officer recommendation for approval at Merton's June planning committee. Should Merton resolve to grant planning permission, Bellway will work with Merton to agree a S106 Agreement within 3-months of the committee. Bellway will then seek to discharge pre-commencement conditions as a priority to allow for preparatory site works to start at the site and the construction of houses at the site to commence thereafter. With this timescale, the LESSA site could begin to deliver housing by mid-2023 at a rate of circa 50 dwellings per year with completion around mid-2025. Therefore, the LESSA site is able to deliver 107 dwellings ahead of the target date in Merton's five-year housing land supply assessment.

The LESSA Grand Drive site is an identified housing site that is able to deliver its required supply of housing in the first five years from adoption of the Local Plan. As an available and deliverable housing site, the LESSA site should be allocated as a housing site in the Local Plan to support the delivery of housing within the first five years of the plan period.

Update on progress of the planning application and update on the site's allocation

The live planning application (Ref: 21/P4063) at the site for 107 dwellings is progressing positively and is due to be presented to Merton's planning committee with a recommendation for approval in June 2022.

Significantly, the application is supported by policy officers and the recommendation that the application should be approved confirms that residential use of the site is acceptable. Further, the application's recommendation

to approve accords with the site's allocation in the draft Local Plan and the policy test within the adopted Merton Playing Pitch Strategy which informed the site's allocation in the draft Local Plan.

As part of the current live planning application at the site, Merton's planning policy team has reviewed the application, the Playing Pitch Strategy position and the emerging policy allocation for the site. Merton's planning policy team has confirmed via email to the appointed planning case officer on 24 January 2022 that the principle of residential development at the site is considered acceptable. Policy officers confirmed that "sufficient information [has been] provided that sporting or community use of the entire site has not been shown to be deliverable." Therefore, other uses of the site are to be considered. As the site is identified to provide new homes to support Merton's five year housing land supply and is subject to a live planning application, the use of the site for housing has is considered acceptable in principle.

Relevant parts of Merton planning policy team response to the live planning application (dated 24 January 2022) is set out below.

The draft Merton Local Plan Site Allocation RP6 (submitted to the Secretary of State in December 2021) states "Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered."

A Playing Pitch Strategy (PPS) was adopted by the council in October 2019. The PPS provides an up to date analysis of supply and demand for playing pitches across the borough. It was prepared in accordance with Sport England guidance and was agreed through a Steering Group with a number of national governing sport bodies and Sport England. With reference to the Recommendations set out in Section 5:

"Recommendation G1: The council's draft Local Plan Site Allocations include the following former playing fields:

- *Site RP6 - Land at the former LESSA Sports Ground (Grand Drive, Raynes Park SW20 9EB).*

This PPS indicates that these sites should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough."

The site is also identified in the Recommendations and Action Plan for specific investigation for the "possibility of installing a cricket pitch and ancillary facilities and parking at this site."

The PPS and Indoor Sports Study highlight that the borough has demand (and will continue to have demand as population grows) for a variety of sports pitches including football, cricket, hockey, tennis (indoor and outdoor) and AGPs (specifically for football, rugby and hockey). A number of conversations have taken place between the applicant team, Sport England and the NGBs about this site and I understand an agreement has been reached with the Raynes Park Lawn Tennis Club for the provision of tennis courts on part of the site. This is supported as it will retain a sporting element on site.

The principle of development for this proposed development has been the subject of lengthy discussion between the council and applicant over the past 18 months. I've put some of the key points and dates below (although this is only a brief summary):

- *October 2019 - Merton Playing Pitch Strategy adopted by the council. This included regular meetings and discussions with council officers, Sport England and sporting NGBs, in consultation with land owners and sports providers and users in the borough. The Lessa site is*

included in the PPS.

- *February 2020 - Pre Application submitted for the site. Limited information was provided to demonstrate sporting uses on site had been fully explored. The Pre App also did not meet the policy tests set out in the NPPF and Merton's policies. Council officers and Sport England were both not supportive of the proposal in its form at the time and highlighted a number of changes and further information.*
- *June 2020 - Revisions made to the Pre-App, with two further options proposed for the site, including the provision of some open space and tennis facilities on site. Subject to the provision of further information and s106 contributions, the council and Sport England were supportive in principle of the option with the tennis courts. A number of incorrect statements were made in the Sports Needs Report and correspondence, which were made clear to the applicant team.*
- *November 2020 - Planning application 20/P3237 submitted. This included the provision of 2 on site tennis courts and ancillary facilities, plus s106 contributions to mitigate the loss of the playing pitches.*
- *January 2021 - Sport England commented that the proposal has potential to be acceptable in terms of meeting Exception 4, provided that suitable mitigation is agreed and formalised in a Section 106 agreement. The applicant proposed £924,406 (including on site tennis facilities), calculated using the Sport England facility cost guidance, Playing pitch calculator and Sports facility calculator. Council officers were also supportive of the proposal at this time in terms of the principle of development, subject to s106 details.*
- *February 2021 - Sport England received new information from the local community that interest from a local cricket club (as part of a consortium) had not been taken into consideration by the applicant team. The ECB and Sport England therefore changed their comments to object to the proposal. Council officers reviewed the new information and agreed that the applicant had not robustly demonstrated that there were no deliverable proposals for sporting uses on the site, as not all offers had been considered by the applicant team.*
- *July 2021 - Meeting held between applicant team and council officers to discuss principle of development. Council officers made it clear that more detailed information was required, particularly from the cricket consortium to enable a complete assessment of whether any sporting uses could be reasonably delivered on site. While a lot of information had been received from various parties, it was not in a form that enabled a thorough assessment of the different offers.*
- *August 2021 - A standard questionnaire was sent to all interested parties requesting confirmation of proposals, funding and timescales.*

Responses received from the parties who have shown an interest in bringing the site forward for sporting uses has enabled a robust assessment of all the proposals put forward. Officers are of the view that while there were a number of different groups who have shown an interest in the site, none of these groups provided the necessary information to show that a sporting scheme would be viably and practically delivered on the site. This was based on the information provided by relating to the type of sporting proposal, need for ancillary facilities, planning considerations, consideration of site constraints, funding availability, discussions and support from relevant sports bodies, delivery timescales and evidence that a viable sports use could be operated on site.

Determination of the principle of development should take into consideration the above, with sufficient information provided that sporting or community use of the entire site has not been shown to be deliverable. However, this is also subject to the s106 requirements set out in the Site Allocation RP6 and Merton's Playing Pitch Strategy.

The planning policy officer response confirms the Council's position that following extensive testing, marketing and investigation, there is no deliverable sporting or community use of the entire site. Bellway has confirmed that it will enter into a S106 Agreement with Merton to provide a significant financial package to support off-site investment into priority sports locations, in line with the Action Plan of the adopted Merton Playing Pitch Strategy. This would improve and maintain existing sporting facilities allowing them to continue as viable operations.

Therefore, with the principle of residential use of the site accepted, it is anticipated that the planning application at the LESSA site can be approved in June and the site will be delivering new homes and supporting Merton's housing land supply ahead of Merton's target forecast.

Summary

The LESSA Grand Drive site has an allocation in the Merton Local Plan (allocation RP6) stating "Sporting or community use of the entire site will have to be proven as undeliverable before any other uses can be considered". Extensive discussions and viability testing of sporting or community use of the entire site by Merton and Bellway over a period of at least 18 months has shown that while there were a number of different groups who have shown an interest in the site, none of these groups provided the necessary information to show that a sporting scheme would be viably and practically delivered on the site. Therefore, subject to a S106 Agreement to provide financial contributions for off-site sporting investment is agreed, which Bellway is willing to accept and is progressing S106 matters with Merton, the principle of residential use of the site is accepted.

The LESSA Grand Drive site is identified in Merton's five-year housing land supply as delivering 107 dwellings in 2026/27. Therefore, the site forms part of Merton's housing land supply and is required to deliver housing to support the Local Plan to be found sound.

The LESSA Grand Drive site is available and deliverable. The current live planning application is progressing towards planning committee in June with an officer recommendation for it to be approved.

Merton's policy team has considered in detail the principle of residential development at the site in detail and for over 18 months. The policy team is satisfied that there is no sporting use that can be viably and practically delivered on the site. The requirements of the Playing Pitch Strategy have been addressed and the allocation of the site in the Local Plan has been tested demonstrating that sporting or community use of the entire site is not deliverable. Therefore, residential uses of the site has been considered and is acceptable in principle.

The LESSA Grand Drive site is an identified housing site. It is able to deliver 107 new homes in the first five years of the Local Plan from its adoption. As a deliverable housing site, the LESSA site should be allocated as a housing site in the Local Plan.

Respectfully, we request that the LESSA Grand Drive site is an allocated housing site in the Local Plan.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Greg Evans", written in a cursive style.

Gregory Evans MRTPI
Associate