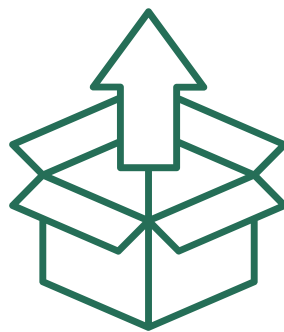


MERTON COUNCIL
FUTURE MERTON



SMALL SITES TOOLKIT

CONSULTATION REPORT

SUPPLEMENTARY PLANNING GUIDANCE

FOREWORD

We'd like to thank everyone who has taken the time to be a part of the Small Sites Toolkit SPD.

Over the course of developing the guidance, we have consulted with many experts within the built environment industries, all of which helped inform the direction of our draft design guidance.

The guidance was published online for formal public consultation during 9 February to 23 March 2021.

This report was produced in June 2021.



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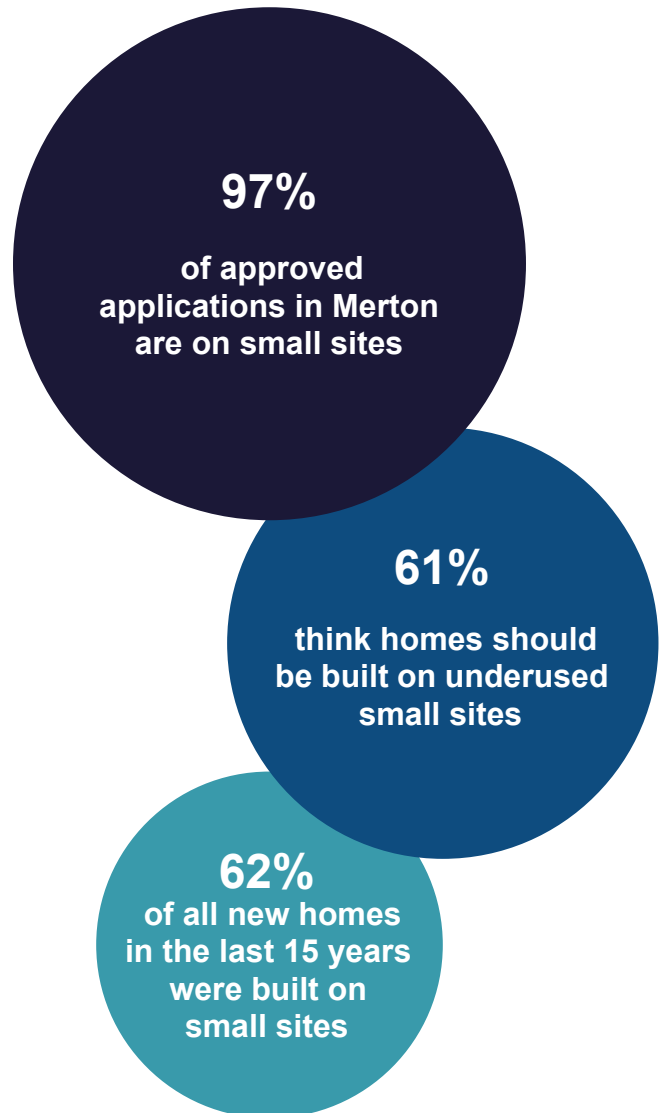
1.1 INTRODUCTION

The Small Sites Toolkit SPD (SSTK) has been developed and produced by Merton Council to provide future applicants with best practice approaches to small sites. In accordance with the London Plan Policy H2, 'Boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making.'

The toolkit provides a design-led framework to help optimise the housing capacity of small sites. It aims to help craft homes that are of a high quality, enhancing the character of local neighbourhoods, and meet the needs of residents of Merton. We want our new homes to be 'Made in Merton'.

Historically small sites have been crucial to housing delivery in Merton and they continue to offer opportunities to grow Merton's housing stock. Over the last 15 years, small sites have provided over 60% of built homes borough-wide and account for over 95% of approved applications.

In July 2020 Icen Projects engaged with over 2,000 Merton residents to learn more about the public's perception of development. Amongst the findings of [the report](#), we learnt that the majority of residents (61%) think new homes should be delivered on 'underused small sites'.



1.2 HOW WE CONSULTED

- 1.2.1 The council is required in accordance with planning legislation to hold a public 6 week consultation. Engagement on the draft Small Sites Toolkit SPD started on 9th February 2021 until 23rd March 2021.
- 1.2.2 The consultation carried out to support the development of the SPD was in two stages:
 - i. Informal consultation:** With experienced built environment professionals during the preparation of the draft SPD.
 - ii. Formal consultation:** After the draft Small Sites Toolkit SPD had been approved by cabinet in January 2021, a public consultation exercise was carried out including, an online survey, workshop with built environment professionals and presenting at two community forums.
- 1.2.3 Formal written consultation emails were sent to local residents, businesses, residential groups and organisations, environmental stakeholders (e.g. Environment Agency) and other interested parties.
- 1.2.4 An email was also sent to circa 600 residents on Merton's Local Plan consultation database.
- 1.2.5 Future Merton attended and presented at the Mitcham and Morden Community Forums during the consultation period and collected feedback from attendees.
- 1.2.6 The consultation was also publicised via social media on the council's Facebook and Twitter accounts.
- 1.2.7 Overall, 40 responses were received to the draft Small Sites Toolkit SPD consultation. Less responses were received via the SurveyMonkey form (17) as opposed to letter or email (23). The questionnaire on Survey Monkey asked for the participant's views on the sections of the SPD and some demographic characteristics.



1.3 FEEDBACK: INTRODUCTION

ANALYSIS

1.2.8 Over half of the respondents who responded via the online survey disagreed with this section. Those who disagreed with this section were against the idea of developing on small sites entirely.

1.2.9 Many emails received from Merton's residents and resident associations welcomed the guidance as they saw it's value in improving the quality of future developments on small sites.

1.2.10 During consultation events with built environment professionals, the guidance was highly supported and welcomed.

The comments from the consultation asked for:

1.2.11 Neighbourhood plans to be acknowledged within the policy context section.

RESPONSE TO COMMENTS

1.2.12 As stated in Policy H2 in the London Plan, Boroughs should pro-actively support well-designed new homes on small sites.

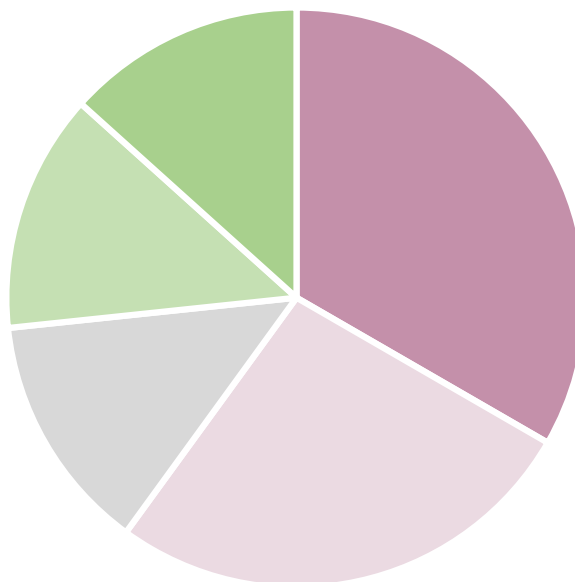
1.2.13 As small sites make up a large contribution of planning applications in the borough, it is inevitable that they will continue to be a form of development in the borough, therefore this guidance is relevant.

1.2.14 We support neighbourhood plans and see the value in the knowledge that local residents have on their communities. Neighbourhood plans highlight the values of local people and should be acknowledged.

SUGGESTED CHANGES

1.2.15 Provide more clarity on the relevance of this SPG in relation to future small sites development.

1.2.16 Neighbourhood plans to be added to the policy context.



■ Strongly disagree	34% [5 respondents]
■ Disagree	27% [4 respondents]
■ Neither	13% [2 respondents]
■ Agree	13% [2 respondents]
■ Strongly agree	13% [2 respondents]

1.4 FEEDBACK: HOW TO USE THE TOOLKIT

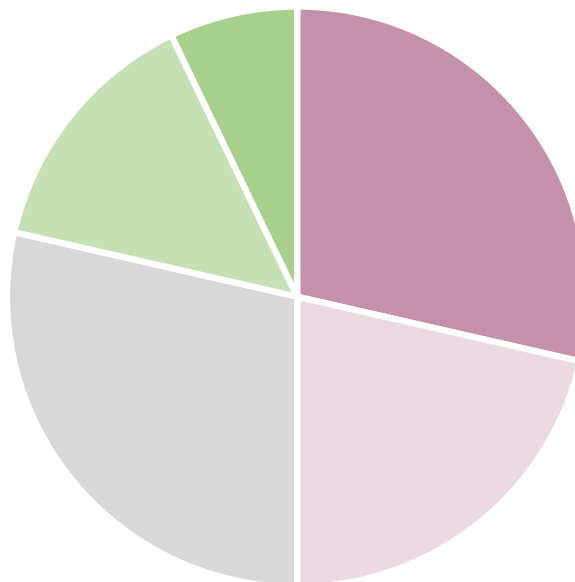
ANALYSIS

The comments from the consultation asked for:

- 1.4.1 More emphasis on the value of early public consultation.
- 1.4.2 Make clearer the use of the council's pre-application service.

RESPONSE TO COMMENTS

- 1.4.3 The council greatly value the local knowledge that local residents have to help inform future development. As highlighted in the NPPF, *"Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."*
- 1.4.4 The council's pre-application service assists applications on best practice approaches in the borough.



Strongly disagree	29%	[4 respondents]
Disagree	21%	[3 respondents]
Neither	29%	[4 respondents]
Agree	14%	[2 respondents]
Strongly agree	7%	[1 respondents]

SUGGESTED CHANGES

- 1.4.5 Further guidance on appropriate engagement with local people.
- 1.4.6 Provide further clarity on the value of the council's pre-application service.

1.5 FEEDBACK: SITE CONDITIONS

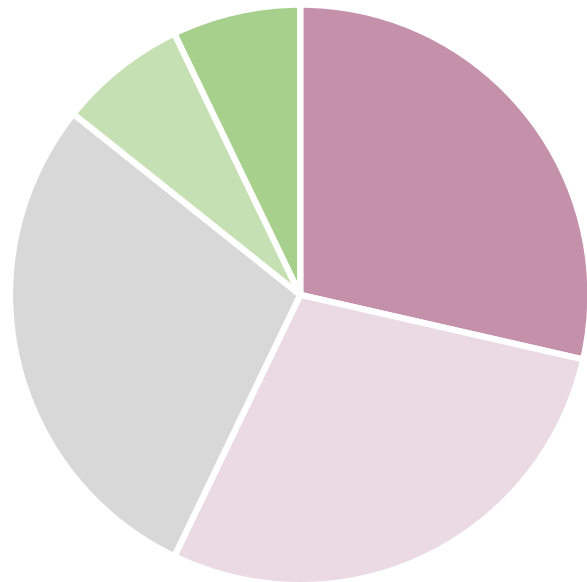
ANALYSIS

1.5.1 Many comments specifically related to an objection to backland development and potential loss of existing trees and vegetation.

The comments from the consultation asked for:

1.5.2 More site constraints, such as legal covenants, mature trees, geology.

1.5.3 More diverse built examples as it was felt, in particular for the backland development, that they were too similar and does not reflect the character of Merton.



RESPONSE TO COMMENTS

1.5.4 Backland development is an re-occurring type of development within the borough and will be ongoing with or without this guidance. The SPG aims to provide design guidance to make future developments of this type better quality.

1.5.5 It is mentioned that site constraints are not limited to what is listed as each development site will have a unique set of constraints to respond to.

1.5.6 Specific design guidance to how some constraints can be approached is found within the main guidance chapters.

■ Strongly disagree	28% [4 respondents]
■ Disagree	29% [4 respondents]
■ Neither	29% [4 respondents]
■ Agree	7% [1 respondents]
■ Strongly agree	7% [1 respondents]

SUGGESTED CHANGES

1.5.7 Additional text to highlight 'mature trees and vegetation and existing natural environments' as a practical issue to consider under constraints.

1.5.8 Precedents to be updated to provide more design diversity and within similar contexts found in Merton.

1.6 FEEDBACK: GOOD DESIGN PRINCIPLES

ANALYSIS

1.6.1 The good design principles were generally welcomed and supported.

The comments from the consultation asked for:

1.6.2 Design principle 'Made in Merton' to remove active travel as an objective and for it to be accommodated elsewhere.

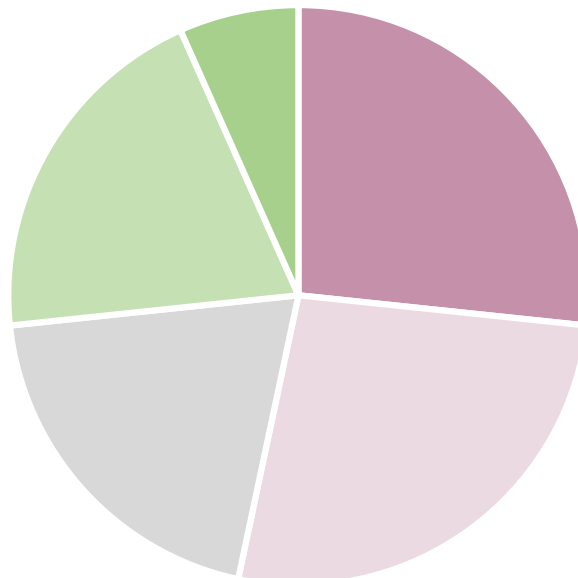
1.6.3 Further emphasis on the guidance that responds to the climate emergency.

RESPONSE TO COMMENTS

1.6.4 It is clear that the climate emergency is of great importance to local residents. Specific design guidance that helps contribute to a net-zero carbon future can be found in the main design guidance chapters.

SUGGESTED CHANGES

1.6.5 The council recognise the importance to promote active travel as a key objective and will accommodate it in another good design principle



Strongly disagree	27%	[4 respondents]
Disagree	27%	[4 respondents]
Neither	20%	[3 respondents]
Agree	20%	[3 respondents]
Strongly agree	6%	[1 respondents]

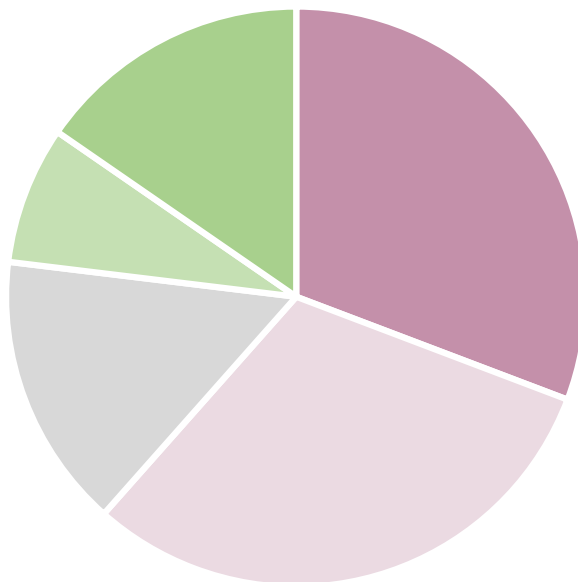
1.7 FEEDBACK: MADE IN MERTON

ANALYSIS

1.7.1 Over half of the online survey respondents disagreed with this section. Many respondents supported this principle, but thought there was missing guidance outlined below.

The comments from the consultation asked for:

- 1.7.2 Further information on working with heritage assets.
- 1.7.3 More information on the value of early public engagement.
- 1.7.4 Active travel to be accommodated elsewhere.



RESPONSE TO COMMENTS

1.7.5 The council greatly value the local knowledge that local residents have to help inform future development. As highlighted in the NPPF, *“Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

1.7.6 Developments that include heritage assets or the setting of heritage assets are judged case by case by Merton’s conservation officers.

 Strongly disagree	31% [4 respondents]
 Disagree	31% [4 respondents]
 Neither	15% [2 respondents]
 Agree	8% [1 respondents]
 Strongly agree	15% [2 respondents]

SUGGESTED CHANGES

1.7.7 Additional text and links to relevant existing Historic England guidance to development and Merton’s Local Character Appraisals.

1.7.8 Active travel guidance will be accommodated elsewhere.

1.7.9 Further information on public engagement will be included.

1.8 FEEDBACK: FIT FOR PURPOSE

ANALYSIS

The comments from the consultation asked for:

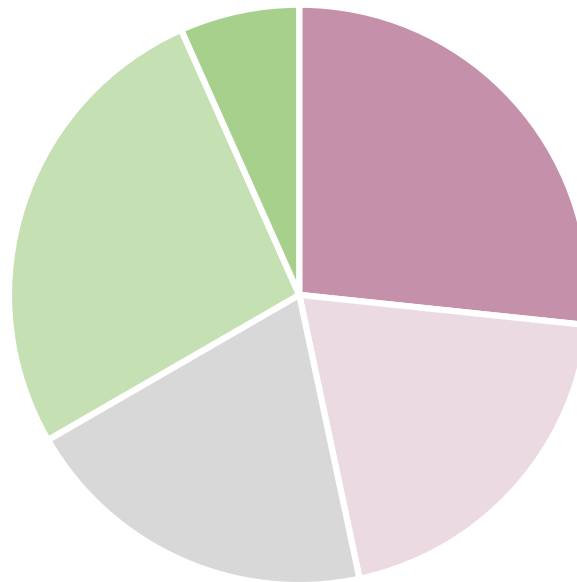
- 1.8.1 Specific guidance to address separation distances.
- 1.8.2 Further guidance on daylight and sunlight to neighbouring properties.

RESPONSE TO COMMENTS

- 1.8.3 The guidance does not give specific quantitative separation distances but gives qualitative guidance to protect any significant impact to privacy and overlooking. Historically 18m separation distances between facing homes were used as a rule of thumb, however this can sometimes restrict good use of land and create places that are of an inhuman scale.
- 1.8.4 Further guidance on daylight / sunlight can be found in 'putting people first'.

SUGGESTED CHANGES

- 1.8.5 Add more clarity on separation distances and daylight / sunlight guidance.



Strongly disagree	27%	[4 respondents]
Disagree	20%	[3 respondents]
Neither	20%	[3 respondents]
Agree	27%	[4 respondents]
Strongly agree	6%	[1 respondents]

1.9 FEEDBACK: PUTTING PEOPLE FIRST

ANALYSIS

1.9.1 The online survey respondents disagreed most with this section with 40% (6 respondents) strongly disagreeing.

The comments from the consultation asked for:

1.9.2 better guidance for the protection of daylight and sunlight to existing amenity

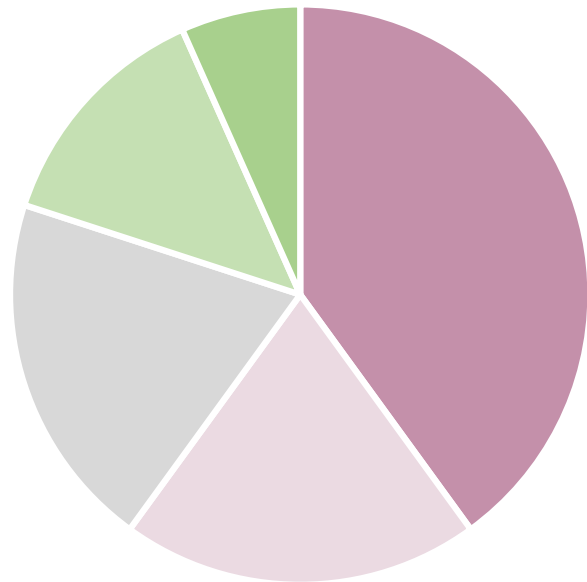
RESPONSE TO COMMENTS

1.9.3 The toolkit provides rule of thumb guidance and sign posts to the relevant daylight / sunlight guidance for applicants.

1.9.4 Planning applications will be judged on a case by case basis. Developments may be asked to provide daylight/sunlight reports to prove that they do not significantly impact neighbouring properties.

SUGGESTED CHANGES

1.9.5 Add further guidance on the daylight / sunlight.



Strongly disagree	40%	[6 respondents]
Disagree	20%	[3 respondents]
Neither	20%	[3 respondents]
Agree	13%	[2 respondents]
Strongly agree	7%	[1 respondents]

1.10 FEEDBACK: ECONOMICAL AND SUSTAINABLE

ANALYSIS

1.10.1 This chapter was generally welcomed however the main comments from the consultation asked for:

1.10.2 include retaining existing buildings as well as encouraging a fabric first approach.

1.10.3 further guidance on working with existing mature trees and vegetation

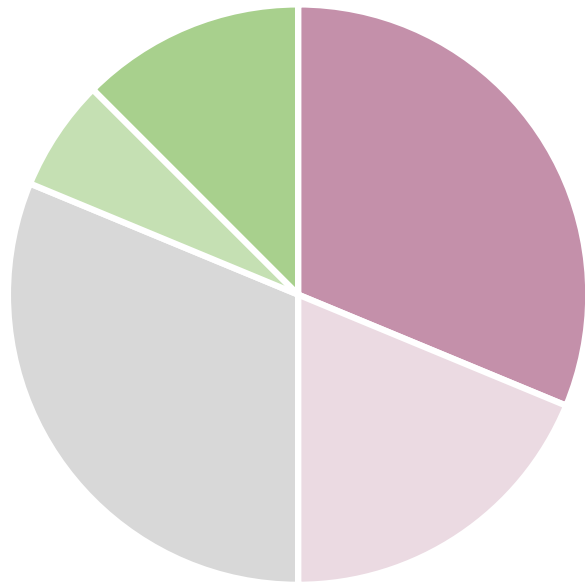
RESPONSE TO COMMENTS

1.10.4 Merton's Climate Strategy and Action Plan sets out an ambitious target for Merton and includes our goals for a net-zero carbon future.

SUGGESTED CHANGES

1.10.5 Add further guidance on the re-use of existing buildings.

1.10.6 Further guidance on using existing mature trees and vegetation.



■ Strongly disagree	31% [5 respondents]
■ Disagree	19% [3 respondents]
■ Neither	31% [5 respondents]
■ Agree	6% [1 respondents]
■ Strongly agree	13% [2 respondents]

1.11 FEEDBACK: CASE STUDIES

ANALYSIS

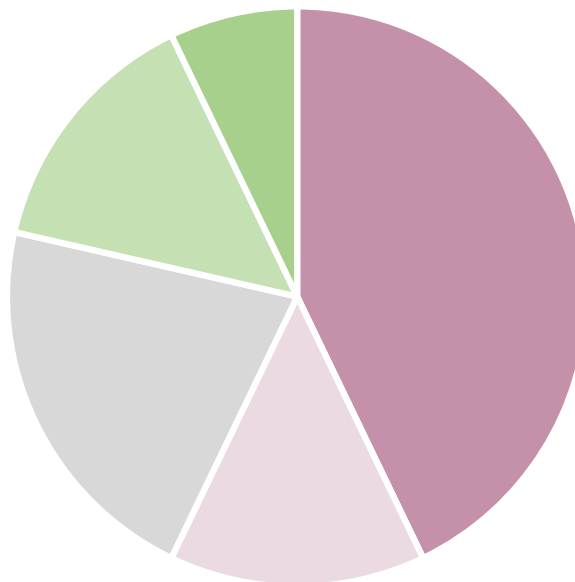
1.11.1 The case studies were described as 'helpful' and were generally supported.

RESPONSE TO COMMENTS

1.11.2 The case studies provide information on exemplar ways to approach small site development. A diverse range of projects have been chosen to cover the variety of character found in Merton

SUGGESTED CHANGES

1.11.3 Consider adding some more case studies to show different approaches to small sites.



Strongly disagree	43%	[6 respondents]
Disagree	14%	[2 respondents]
Neither	22%	[3 respondents]
Agree	14%	[2 respondents]
Strongly agree	7%	[1 respondents]

1.12 FEEDBACK: DAS TEMPLATE

ANALYSIS

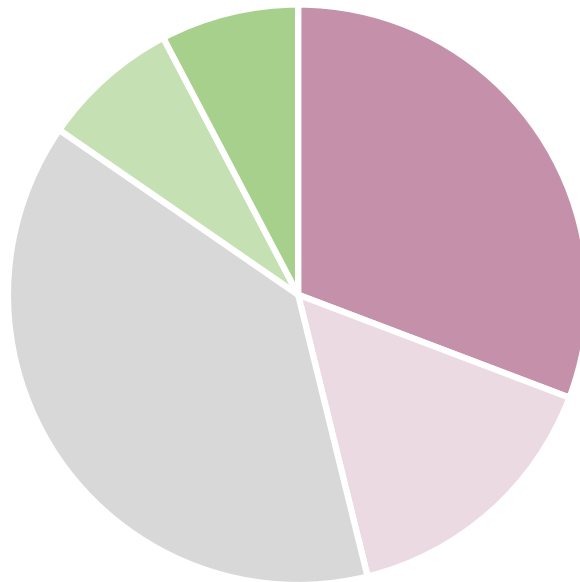
1.12.1 The Design and Access Statement template was generally supported and was described as 'being helpful to the community in understanding the design principles underpinning development proposals.'

RESPONSE TO COMMENTS

1.12.2 Design and Access Statements form an essential part of the planning application and is the applicants time to justify their design decisions. The template asks key questions to make sure the applicant has thought holistically about the scheme and that the crucial design moves have been explored and tested appropriately.

SUGGESTED CHANGES

1.12.3 Finalise template and give more clarity on suggested drawings to be included.



Strongly disagree	31%	[4 respondents]
Disagree	15%	[2 respondents]
Neither	38%	[5 respondents]
Agree	8%	[1 respondents]
Strongly agree	8%	[1 respondents]

1.13 CONCLUSION

- 1.13.1 The online questionnaire was a mixture of tick box responses and text comments. Our analysis shows that there were many sections where people ticked 'strongly disagree' or 'disagree'. Email responses revealed there was support for the guidance and comments from built environment professionals also believed that the guidance will help improve the overall quality of future small site development.
- 1.13.2 The re-occurring comments received rare summarised into the following points:
- making sure that the ambition for a net zero carbon future had a strong presence throughout the guidance.
 - emphasising the value of engaging with local residents and communities.
- 1.13.3 The next step for the Small Sites Toolkit SPD is for it to be adopted by Council in June 2021.