

LONDON BOROUGH OF MERTON
ENVIRONMENT AND REGENERATION
DEPARTMENT

**TOWN & COUNTRY PLANNING ACT 1990 (AS
AMENDED)**

**PROOF OF EVIDENCE PREPARED BY MS VALERIE MOWAH (PLANNING POLICY
OFFICER) ON BEHALF OF THE LOCAL PLANNING AUTHORITY**

265 BURLINGTON ROAD
APPELLANT – REDROW HOMES LTD

Local planning authority ref – 19/P2387
Planning inspectors Ref – APP/T5720/W/20/3250440

Table of Contents	Page
1. Introduction	3
2. Chronology of events	4
3. Five year land supply requirement	5
4. Merton's five year land supply	6
5. Sources of supply	8
6. Approach to assessing delivery and implementation	12
7. Small sites	12
8. Housing Delivery Test	14
9. Tilted balance	15
10. Emerging new London Plan and Merton's draft Local Plan	15
11. Draft Local Plan five year land supply position	15
12. Addressing backlog	21
13. Impact of Covid-19	22
14. Conclusion	23

1. Introduction

1.1. The Witness

1.2. My name is Valerie Mowah. I hold an undergraduate degree in Urban Planning Studies BA (Hons) and an RTPI accredited post graduate Diploma in Urban Planning Implementation. I have over 20 years planning experience, the majority of which is in the local authority public sector on housing planning policy. My proof of evidence will focus on housing supply and delivery. I confirm that the evidence which I have prepared and provide for this appeal Ref. APP/T5720/W/20/3250440 is true and the opinions expressed are my true and professional opinions.

1.3. The Appeal Application 19/P2387

1.4. This appeal is against non-determination of the planning application. The planning application would have been refused by London Borough of Merton for the following reasons if the application had been determined:

The proposals by reason of the number of units proposed, the location of the main vehicle access coupled with the prevailing intermittent road congestion arising from the operation of the nearby level crossing, and in the absence of a controlled parking zone or other additional parking controls operating locally, would be likely to:

- *Exacerbate potential for congestion, already prevalent in the vicinity of the application site and at the nearby junction of West Barnes Lane and Burlington Road, precipitated by the level crossing that results in significant queuing, impacting on the road and various junctions and more so at the existing egress to the site, leading to a harmful impact on the overall environment including safety and the efficient operation of the highway network within the vicinity of the appeal site. The proposals would contribute towards a motorised vehicle dominant environment which diminishes the quality of environment for pedestrians and cyclists and does not encourage sustainable modes of movement;*
- *Exacerbate pressure on kerbside parking locally to the detriment of the amenities of existing residents, as a controlled parking zone or other additional parking controls operating locally, could not be implemented unilaterally by the Council as Traffic Authority on the basis of a S106 undertaking, any such proposal being subject to consultation processes and Cabinet member approval and thus any outcome cannot be pre-judged; and*
- *The proposals would be contrary to policies 6.3 and 6.10 of the London Plan (2016), Policies CS18 and CS20 of the Merton Core Planning Strategy (2011), and policy DM.T2 of the Merton Sites and Policies Plan (2014).*

- 1.5. The putative reason to refuse the planning application was taken by Merton's Planning Applications Committee on 13th February 2020.
- 1.6. It should be noted that the reason to refuse the planning application is not on the grounds of non-compliance with planning policies on housing matters.
- 1.7. A SoCG has been issued in June 2020.
- 1.8. This proof is written on the basis that the legal agreements for the appeal scheme can be agreed and engrossed prior to the Inquiry. The appellant has agreed this position in their SoCG, together with their draft heads of terms. If agreement cannot be reached, the Council will explain and justify its position, through evidence if necessary, with regard to any outstanding matters.
- 1.9. This proof of evidence will focus on matters of housing supply and delivery.
- 1.10. It is noted that the scheme will contribute towards increasing housing supply for more homes in accordance with Policy 3.3 (Increasing Housing Supply) and Table 3.1 of the adopted London Plan 2016.
- 1.11. The Council acknowledges that the housing target is proposed to be dramatically increased under the emerging London Plan (the figure will be nearly doubled to 918 dwellings) and the contribution of the scheme in these circumstances is a benefit which should be weighed in the overall planning balance.
- 1.12. However, this cannot – and should not – detract from the basic policy position which is that the Council has an up-to-date Development Plan, it has a five year housing land supply, and thus the 'tilted balance' is not engaged. The contribution of the scheme in circumstances where the housing target is going to increase dramatically is a benefit which should be weighed in the overall planning balance.

2. Chronology of events concerning the Council's five year land supply position (2020/21 to 2024/25)

- 2.1. June 2020 - Council Statement of Case: set out that for 2020/21 the adopted London Plan 2016 target is 411 units per annum is applied. For the remaining 4 years (2021/22 to 2024/25) the Intend to Publish London Plan target of 918 units per annum is applied. Resulting in a total five year land supply of 107%.
- 2.2. June 2020 - Statement of Common Ground: set out identical Council position as the Council's Statement of Case regarding when the target of 411 and 918 homes per annum are applied for the five year land supply period.
- 2.3. June 2020 - Merton's Housing Land Supply Note: set out identical Council position as Council's Statement of Case and Statement of Common Ground position regarding when target of 411 and 918 homes per annum are applied for the five year land supply period.

- 2.4. 30th July 2020 – Council's response to applicant's appeal note requesting an updated five year land supply position: Set out an unchanged position regarding when the 411 and 918 homes per annum target are applied for the five year land supply period. Resulted in an updated total five year land supply of 101% to take account of the following:
- 200 units removed from 2024/2025 for Benedict Wharf whilst waiting for GLA referral decision following a refusal of 19/P2382 by Merton's Planning Applications Committee on 18th June 2020 ;
 - Abbey Wall Works (20/P1672) reduced from 58 to 54 units in 2023/24 following July 2020 approval;
 - 20/P1060 – 25 units added to 2024/25 following July 2020 approval;
 - 19/P2747 – 20 units removed from windfall double count assumption for 2023/24 following July 2020 approval.
- 2.5. 31st July - Clarification requested from GLA by Council
- 2.6. 17th August – Response from GLA received by Council.
- 2.7. 3rd September - Applicant emailed Council with the following question: from my brief look you are showing 101% delivery, which doesn't include the required 5% buffer (para 73a of the NPPF). Can I check, for the avoidance of doubt, that the Council are confirming that they don't have a 5YLS?
- 2.8. 17th September - Council e-mail response to applicants stating: "The Council would agree that at this specific point in time that the 5YLS is not met."
- 2.9. 15th October - Council sought legal advice from Counsel.
- 2.10. 3rd November - Council emailed draft summary table for the Inspector to the applicants setting out a revised position, informed by both GLA and Counsel's advice, that the adopted London Plan target of 411 homes per annum is applied for the entire five year land supply period (2020/21 to 2024/25). Resulted in an updated total five year land supply of 198% following an update to include planning permissions granted and refused to the end of October 2020.
- 2.11. It should be noted that the Council's revised position, is informed and supported by clarification provided by the GLA and Counsel's advice on interpretation of NPPF.
- 2.12. Therefore, this document should be considered the most up to date position on all matters relating to housing supply for the purposes of this appeal. The following documents are now considered out of date:
- June 2020 Council Statement
 - June 2020 Statement of Common Ground
 - June 2020 Merton's Housing Land Supply Note
 - July 2020 – September 2020 emails relating to housing supply

2.13. Notwithstanding, the Council is not ignoring the significant weighting and materiality that should be given to the emerging London Plan target of 918 homes per annum which the Council is appropriately addressing through revisions to its Local Plan.

3. Five Year Land Supply Requirement

- 3.1. The requirements for local planning authorities to identify a five year housing land supply is set out in NPPF paragraph 73 which states:
- 3.2. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
 - (a) 5% to ensure choice and competition in the market for land;
- 3.3. The housing targets as set out in Merton's Core Planning Strategy are out of date and are superseded by the adopted London Plan 2016 as this is the most up to date document in the Council's statutory development plan. The 2016 London Plan sets the strategic housing target for London, including a disaggregation in Table 3.1 by borough, which for Merton is 411 units per annum. The Council has a 198% supply measured as against the adopted strategic housing policies. It thus amply meets its housing target. The policies in the published London Plan 2016 are less than 5 years old, remain up to date and have not been superseded by a newly published London Plan at the time of determination.
- 3.4. NPPF Footnote 37 states:
- 3.5. *Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance*
- 3.6. Footnote 37 of the NPPF relates solely to the final sub-clause of the sentence – the situation where strategic policies are more than five years old.
- 3.7. It provides that the standard method will be used:
- 3.8. "unless these strategic policies have been reviewed and found not to require updating", in which case the policies themselves can be relied on. It is of no relevance here since the Council's adopted strategic policies are less than 5 years old. This is confirmed by para 005 of the PPG which provides that: "Housing requirement figures identified in adopted strategic housing policies should be used for calculating the five year housing land supply figure where: the plan was adopted in the last 5 years OR the strategic housing policies have been reviewed within the last 5 years and found not to need updating."

4. Merton's five year supply

- 4.1. Without the 456 units proposed at Burlington Road, Merton can demonstrate 198% supply against the current adopted London Plan target of 411 new homes per year as Figure 1 below illustrates. Therefore, Merton is not dependent on this site to meet its five year land supply.

Figure 1: Merton's five year supply

2020-2025	Total Supply	(411 target for 5 years)
Housing target		2,055
5-year supply excluding Burlington Road	4,084	198%
Years of supply		9.9

- 4.2. Figure 2 shows Merton's five year housing supply against the adopted 2016 London Plan target of 411 new homes per annum and Figure 3 shows this data cumulatively.

Figure 2: Merton's five year supply against adopted 411 housing target excluding Burlington Road site

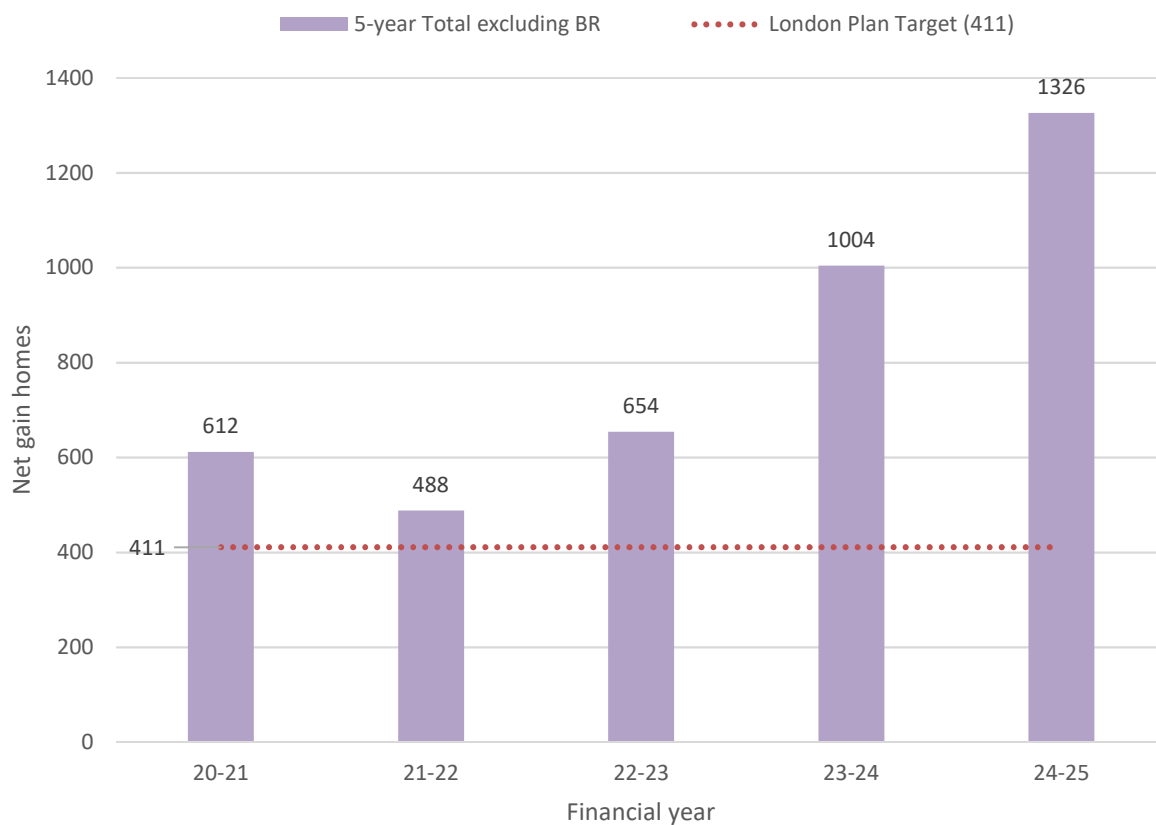
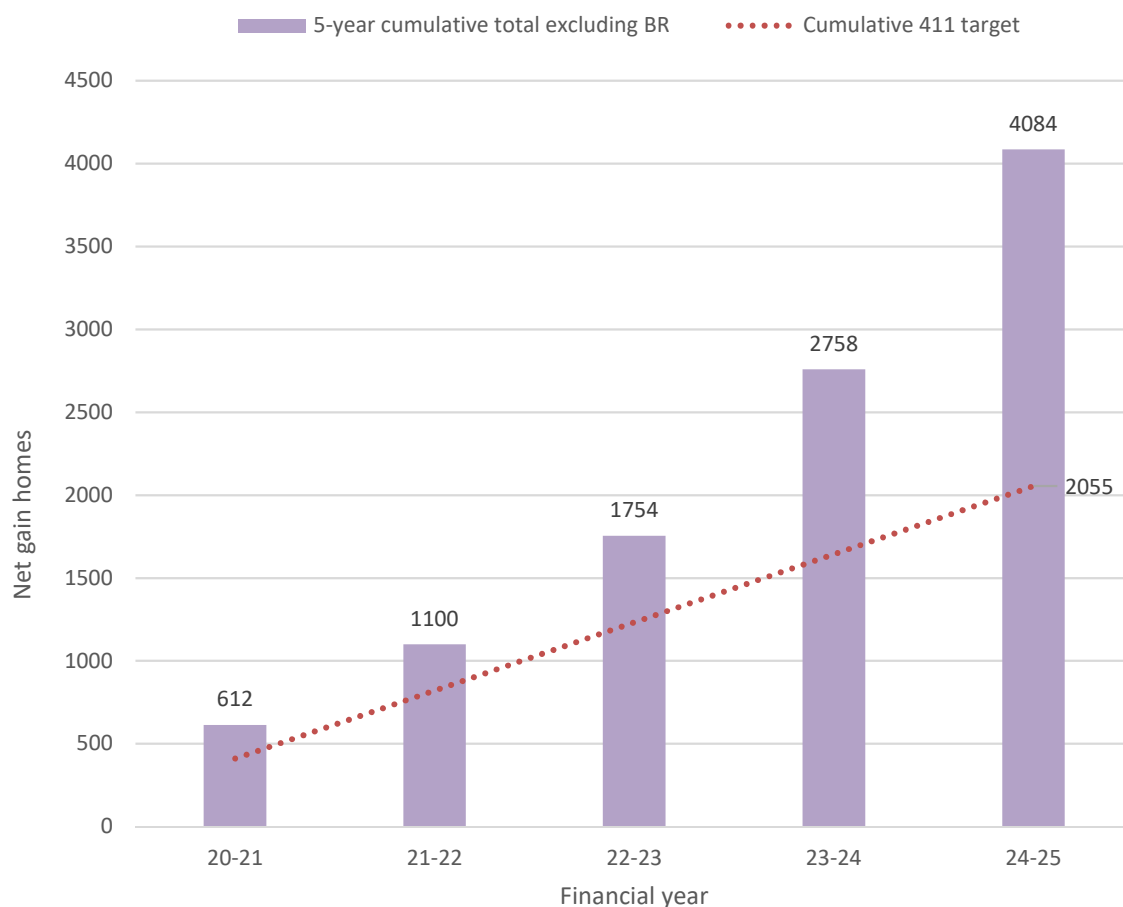


Figure 3: Merton’s cumulative five year supply against adopted 411 housing target excluding Burlington Road site



5. Sources of Supply

5.1. Merton’s five year supply has been calculated from the following types of sites:

- a) Sites with permission (e.g. Full Planning Permission, Prior Approval, Lawfulness)
- b) Sites allocated in Merton’s Sites and Policies Plan and in Merton’s New Local Plan (currently at Stage 2a)
- c) Sites in the London Plan SHLAA 2017 that were identified to complete during the five year period.
- d) Sites with validated permissions where there is sufficient evidence that they will be delivered within the five year period.
- e) Sites at pre-application stage where there is sufficient evidence that they will be delivered within the five year period.

5.2. This information is presented in Figure 4 and 5 below.

Figure 4: Sources of supply

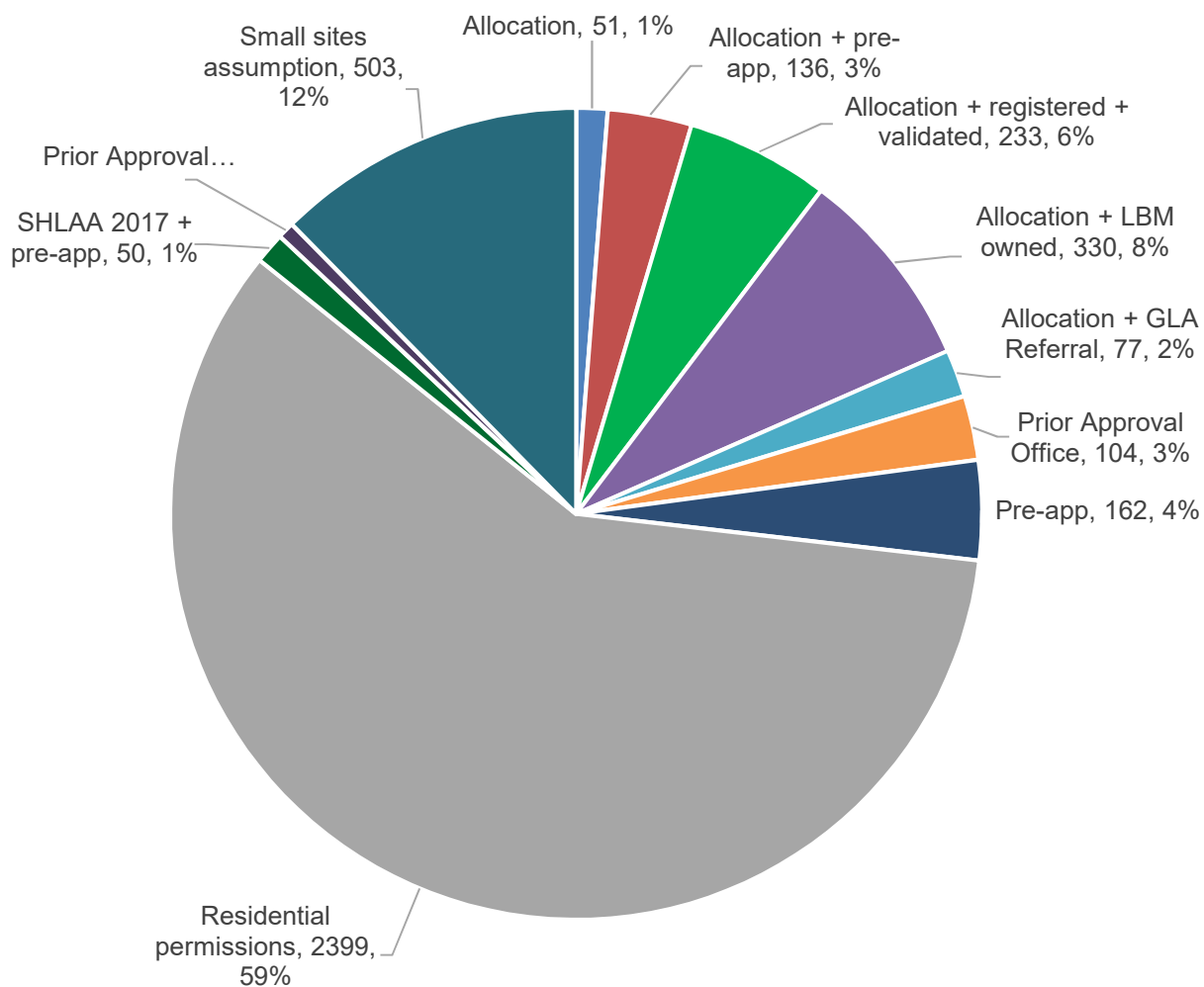


Figure 5: Sources of supply

Status	Number of units	Comments
Residential permissions	2488	Schemes granted planning permission at November 2020
Prior Approvals	131	Schemes granted permission from office, retail and storage use to residential use.
Small sites assumption	503	Inspector's recommendation for Intend to Publish London Plan: PR9, Paragraph 4.2.4 "The small site target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019."
Allocations in 2014 Local Plan	51	Former Wilson Hospital: (11 homes based on 04/P0355) and Birches Close (40 homes) These sites to be redeveloped for housing in connection with new Mitcham Health and Wellbeing Hub. Latest papers at programme board are for planning and disposal January 2022.
Draft allocation + pre-app	136	Wimbledon Park: Pre-app meeting in October 2020 for +100 units. Details are confidential at present. Programmed for planning application submission mid-2021. 36 homes estimated to be built by 2024-25 (i.e. not the whole site, and also takes a cautious approach in case the number of homes is reduced in the development process) Colliers Wood: Pre-app meetings during 2020 including Merton's Design Review Panel in May 2020 for +150 homes. Details are confidential at present. Programmed for planning submission during 2021. Merton 5 year land supply includes 100 homes from this site in 2024-25, taking a cautious approach)
Draft allocation + registered + validated - 20/P1738s	233	YMCA, The Broadway: proposing 141 homes: planning application number 20/P1738 Land at Meadowview Close: proposing 92 homes, planning reference number 20/P3237
Draft allocation + resolution to grant planning permission + GLA Referral	77	Tooting and Mitcham Hub: 77 homes - 19/P4094 At GLA Stage 2 referral following resolution to grant Planning Permission at August 2020 Committee. GLA decision due December 2020. Also a draft allocation in the new Local Plan
SHLAA 2017 + pre-app	50	White Hart, Kingston Road, Wimbledon: 2017 pre-app for 50 flats and public consultation: http://www.mertonpark.org.uk/the-journey-begins/ Site information: https://www.144kingstonroadsw19.co.uk/development-options/ . May 2020 - in pre-app for 63 flats Site is also SHLAA assessed capacity for 70 homes (35 delivered in Phase 2 – 2019-2024 and 35 homes in Phase 3 – 2024-2029).

		<p>Mitcham CAB: Valuation carried out as part of Merton's OPE Programme February 2019. Draft allocation in New Local Plan, part of Merton's review of property in response to Covid-19. Disposal is subject to relocation of current services in the building.</p> <p>Gifford House: Draft allocation in New Local Plan, part of Merton's review of property in response to Covid-19. Due to go to Merton's Property Asset Management Board recommending disposal in March 2021. Disposal is subject to relocation of current services in the building.</p> <p>Chaucer Centre: Draft allocation in New Local Plan, part of Merton's review of property in response to Covid-19. Due to go to Merton's Property Asset Management Board recommending disposal in March 2021. Disposal is subject to relocation of current services in the building.</p> <p>Worsfold House: Draft allocation in New Local Plan. Valuation carried out as part of Merton's OPE Programme February 2019. Disposal agreed at Merton's Property Asset Management Board July 2020 following completion of construction at Melrose School on adjacent site.</p> <p>Battle Close: Declared surplus and suitable for disposal at Merton's Property Asset Management Board May 2020. Proceeding with disposal.</p> <p>Morden Town Centre Phase 1: There are a number of sites that could be included as phase 1 of Morden town centre regeneration. New local plan site allocation and sites and policies plan (2014). Morden regeneration supported in Merton Core Planning Strategy, Sites and Policies plan 2014 and new Local Plan draft 2019. These include the allocated sites (2014) of: Site 57: Morden Station Offices and Retail Units Site 58: Sainsbury's (Peel House) Car Park Site 61: Morden Station Car Park Site 65: Kenley Road Car Park Phase 1 on council owned car park, no demolition and 100 units assessed in July 2020 capacity study.</p>
Allocation + Merton Council owned	330	
		<p>Wimbledon Chase Station: pre-app and local consultation for 62 units in 2019. Update September 2020 - in response to consultation they are looking to provide step free access and have expected to come in again for pre-app soon.</p> <p>Station Road, Colliers Wood: pre-app meetings during 2020 including Merton's Design Review Panel in June 2020. DRP for 118 units, reasonable to assume site has capacity for 100+ units, therefore 100 included in 5 year supply. Scheme is out for public consultation here: https://www.stationroadproposals.co.uk/</p>
Pre-app	162	
Total	4084	
% 411 target	199%	

6. Approach to assessing delivery and implementation

- 6.1. As can be seen from the evidence presented in Figure 6 above, the Council is taking a cautious approach to assessing whether sites are deliverable during the first five years. This is done by:
- Modelling small sites at 261 homes per year from Year 3 onwards, even though the evidence is that more than 261 homes are built on small sites each year (see Figure 6 row 2 below)
 - Ensuring that we have robust evidence for any site included in the first five years that does not have planning permission. For example, a site at 579-583 Kingston Road (the former Manuplastics site) has full planning permission for 99 homes (16/P1208 granted in 2018) and the applicants are discharging planning conditions including for the construction management plan in 2019. It could be included in the first five years supply. However, as this site has had a series of full planning permissions without being built, we are taking a cautious approach and have not included it in the first five year supply.
- 6.2. Where a site is in pre-application discussions, we have assumed a lower number of homes taking a cautious approach that the number of homes proposed pre-application may be reduced through the development process

7. Small Sites

- 7.1. Small sites are defined as those below 0.25 hectares in size, regardless of the number of homes built on them and regardless of how permission to develop is achieved (e.g. change of use, prior approval, new build etc.). In line with the New London Plan small sites methodology, an assumption of 261 new homes per year on small sites has been added from year 3 (2022-2023) onwards. For the purpose of the SHLAA study, small sites are those below 0.25 hectares in size and can include housing completions through:
- new build developments
 - change of use
 - residential conversions
- 7.2. Merton is a borough of small sites and historically delivers more than 261 new homes each year on sites of less than 0.25ha. For example:
- in FY18-19, 272 new homes were built on sites of less than 0.25ha.
 - in FY19-20, 283 new homes were built on sites of less than 0.25ha.
- 7.3. Therefore, it is a reasonable and conservative approach, supported by evidence to use the New London Plan assumption of 261 new homes being built per year on small sites in Merton's 15-year housing trajectory including year supply.
- 7.4. Included within Merton's five year supply are "identified small sites", which already have planning permission. These are all expected to complete before 2024. For Figure 6 below:

7.5. Row 1 is the homes to be built on small sites that are included in the five-year supply (i.e. projected using the London Plan methodology of 261 homes per year from year 3 onwards)

7.6. By way of example Row 2 of Figure 6 below shows the number of homes that already have permission to be built on small sites. This demonstrates that even as early as 2020, 251 homes are proposed for small sites in three years' time and year 1 and year 2 exceed 261 homes per year. This demonstrates that the modelling of 261 new homes to be built on small sites each year in Merton as per the London Plan is reasonable and deliverable.

7.7. Row 3 shows Row 2 as a percentage of the London Plan Small Sites assumption.

Figure 6: Small sites delivery

Row id	Financial Year	20-21	21-22	22-23	23-24	24-25
1	Homes projected on small sites (<0.25ha) included in 5 year supply total (i.e. modelled from Year 3 onwards)	342	365	261	261	261
2	Homes projected on small sites (<0.25ha) without modelling assumption from year 3	342	365	251	80	0
3	% Small sites target identified	131%	140%	96%	31%	0%

7.8. The premise of the New London Plan approach to small sites is that once the New London Plan is adopted, it will create planning policy certainty that small sites development will be supported in London, thus increasing housing delivery on small sites. In addition to this, Merton Council is taking proactive steps to increase provision of well designed schemes on small sites, for example by developing a small sites toolkit funded by the GLA's Homebuilding Capacity Fund. It is designed to give designers and developers a clearer picture of what would be considered acceptable development on small sites in the Borough.

8. Housing delivery test

- 8.1. In February 2017 the Government published the Housing White Paper “Fixing our broken housing market”, which proposed a new initiative to measure the performance of local authorities via a Housing Delivery Test. This has been taken forward as part of the revised National Planning Policy Framework (NPPF) that was published in July 2018. Paragraph 75 of the NPPF states:
- 8.2. To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous 3 years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
- 8.3. The most up to date Housing Delivery Test Calculation is the 2019 Measurement published in February 2019. Merton’s delivery over the past three financial years against the London Plan housing target of 411 results in a PASS with 114% of housing need delivered (table1). This means that Merton is not required to produce an Action Plan.

Figure 7: Housing Delivery Test measurement 2019

Merton	2016-17	2017-18	2018-19	Total homes delivered	HDT 2019 measurement	HDT 2019 consequence
Number of homes required	411	411	411	1233		
Number of homes delivered	434	675	296	1405	114%	PASS

9. Tilted Balance

- 9.1. NPPF Paragraph 11 concerns application of the presumption in favour of sustainable development and what this means for local planning authorities for plan-making and decision-taking.
- 9.2. Paragraph 11(b) of the NPPF applies the so-called 'tilted balance' to cases where the policies which are most important for determining the application are out-of-date.
- 9.3. What is meant by 'out-of-date' is qualified by Footnote 7 which states that:
- 9.4. "This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites."
- 9.5. Since the Council can demonstrate a five year supply of deliverable housing sites when measured against the correct target in the adopted strategic policies at the current time, the 'tilted balance' is not engaged in this appeal.

10. Emerging new London Plan and Merton's draft Local Plan

- 10.1. The Council acknowledges that the housing target is proposed to be dramatically increased under the emerging London Plan (the figure will be nearly doubled to 918 dwellings). The Plan is at an advanced stage of preparation (at the Intend to Publish stage) and its policies should be given significant weight, especially those where the Inspector has not suggested any changes.
- 10.2. It should also be noted that at the time of writing the Secretary of State has not accepted the recommendations concerning a number of housing policies matters, including those concerning London's housing target, from the Mayor of London (or the Examination Panel of Inspectors) on the Intent to Publish London Plan. Consequently the replacement London Plan has not yet been permitted for publication.
- 10.3. The Council is in the process of consulting on revisions to its Local Plan to reflect the increased housing figure in the emerging London Plan and will be providing additional allocations to meet the necessary supply. A stage 1 public consultation took place between October 2017 and January 2018. This was the first stage, asking general questions about what sites or what policies the Local Plan should contain. A stage 2 public consultation took place between October 2018 and January 2019. It contained draft policies, potential sites for allocation and land designations (e.g. town centre boundaries). Whilst the draft Local Plan is a material consideration, its weighting, given its status is limited at this stage.

11. Draft Local Plan five year land supply position

- 11.1. Figure 9 sets out how the emerging draft Local Plan will reflect the increased housing figure in the emerging London Plan.

11.2. Row 5 of Figure 9 demonstrates the total number of homes projected to be built per year over the next 15 years. This is made up of homes built on small sites (row 3) and homes built on large sites (row 4)

11.3. Rows 6 and 7 of Figure 9 demonstrate the New emerging London Plan target of 918 per year and the percentage (row 7) of this target that is achieved each year from the total number of homes projected to be built (row 5). It should be noted that part of Merton’s housing supply is from the regeneration of three largest estates by Clarion Housing Group to create +1,500 new homes. This means that in some years, the net number of homes (row 5) is reduced by the demolition of homes within the first five year of the estate regeneration and these homes are only replaced in later years. Overall, 1,172 homes are being demolished as part of the regeneration, these are shown in Figure 8 below.

Figure 8: Demolitions associated with Estates Regeneration

Financial year	High Path Estate homes demolished	Eastfields Estate homes demolished	Ravensbury Estate homes demolished
20-21			
21-22			-32
22-23	-84	-25	-32
23-24			-33
24-25			
25-26	-296	-128	
26-27			
27-28		-140	
28-29	-47		
29-30		-108	
30-31		-66	
31-32	-117		
32-33			
33-34	-64		

- 11.4. Rows 6 and 7 of Figure 9 demonstrate that the adopted London Plan target of 411 homes per annum (row 6) will be exceeded by a high percentage each year (row 7). The adopted London Plan 2016 is part of Merton's statutory development plan and is less than 5 years old. Therefore the Council is meeting their housing targets.
- 11.5. Row 8 and 9 of Figure 9 sets out the housing target assuming that by 2021/22 the 2016 London Plan (target of 411 homes) will have been replaced by the publication of the New London Plan (target of 918 homes). These two rows set out how the total number of homes in row 3 compares with one year of a 411 target and four years of a 918 target.

Figure 9: Merton's 15 year housing trajectory excluding Burlington Road scheme

Plan year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	15 year Total	% 15 year target	
Financial Year	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35			
1	Homes projected on small sites (<0.25ha)	342	365	261	261	261	261	261	261	261	261	261	261	261	261	261	4,100	28%
2	Homes projected on large sites	270	123	393	743	1065	506	975	1089	942	666	580	937	604	596	960	10,449	72%
3	Total homes projected	612	488	654	1004	1326	767	1236	1350	1203	927	841	1198	865	857	1221	14,549	106%
4	Draft London Plan Target (918)	918	918	918	918	918	918	918	918	918	918	918	918	918	918	918	13,770	100%
5	% Target delivered	67%	53%*	71%*	109%	166%	111%*	135%	147%*	131%*	101%*	92%*	131%*	94%	93%*	133%	*Estate demolitions	
6	Adopted London Plan Target (411)	411	411	411	411	411												
7	% Target delivered	149%	119%	155%	244%	323%												
8	London Plan Target (411+4*918)	411	918	918	918	918												
9	% Target delivered	149%	53%	69%	109%	144%												

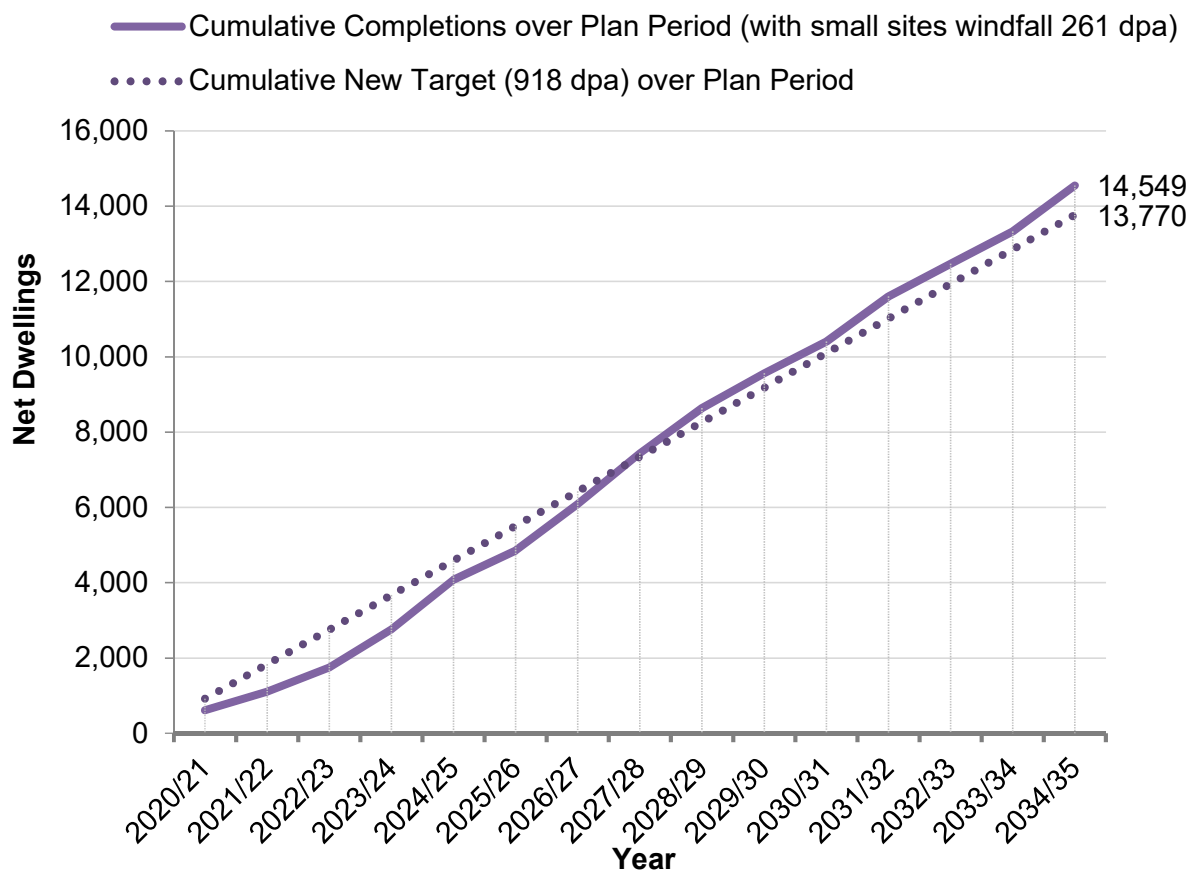
11.6. The draft London Plan itself (and other guidance from the Mayor of London) acknowledges that the increase in the housing target is large and supply must increase gradually to meet it over a 10 year period. Notwithstanding, this does not detract from the position, which is that the 2016 London Plan target of 411 target is up to date and against which the Council can demonstrate a five year land supply of deliverable sites at 198%.

11.7. Para 4.1.10 of the Intend to Publish London Plan states:

11.8. *“The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic, and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery”.*

11.9. Despite the significant increase proposed by the emerging London Plan to Merton’s housing target (223% uplift) Figure 10 indicates that the stepped transition towards achieving the target will take place over the next three years. Housing pipeline is fluid and dynamic and therefore it is considered unrepresentative to judge Merton’s likely cumulative performance in meeting its 15 year housing target on its attainment in specific individual years.

Figure 10: Housing Delivery above or below the different targets over 15 year plan period without Burlington Road scheme



11.10. Figure 11 demonstrates Merton’s previous housing delivery over the last 15 years. Across the last 15 years, Merton has over-delivered against its housing target as demonstrated in Figure 12 (also available in Merton’s authority monitoring report 2018-19) in the last two financial years, Merton has not achieved its housing target. This is simply due to the limited amount of large sites that completed construction during those two years, despite over 90% of planning applications for new homes in Merton being approved and many large sites being under construction during this time. For example, during 2018-19 although many large sites in Merton were under construction, such as +630 homes at Wimbledon Stadium, 136 homes at High Path and 75 homes at the former Atkinson Morley site, Copse Hill, only one site of more than 10 homes was completed that year.

Figure 11: New homes built between 2004 - 2020

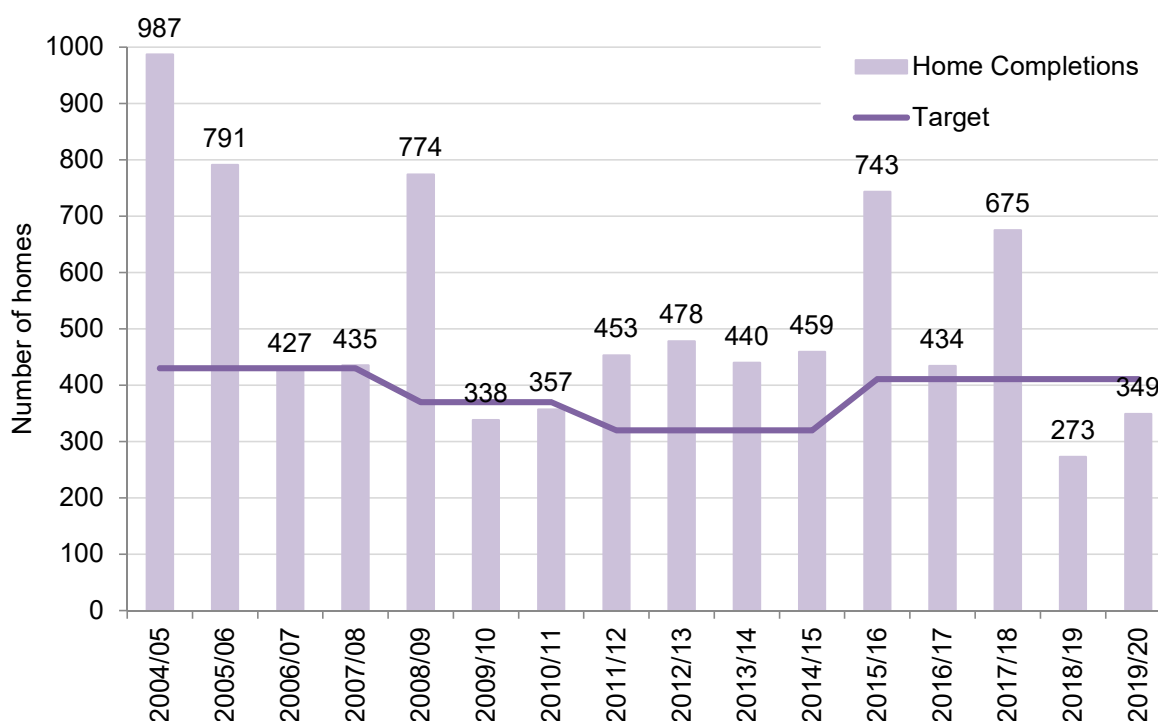
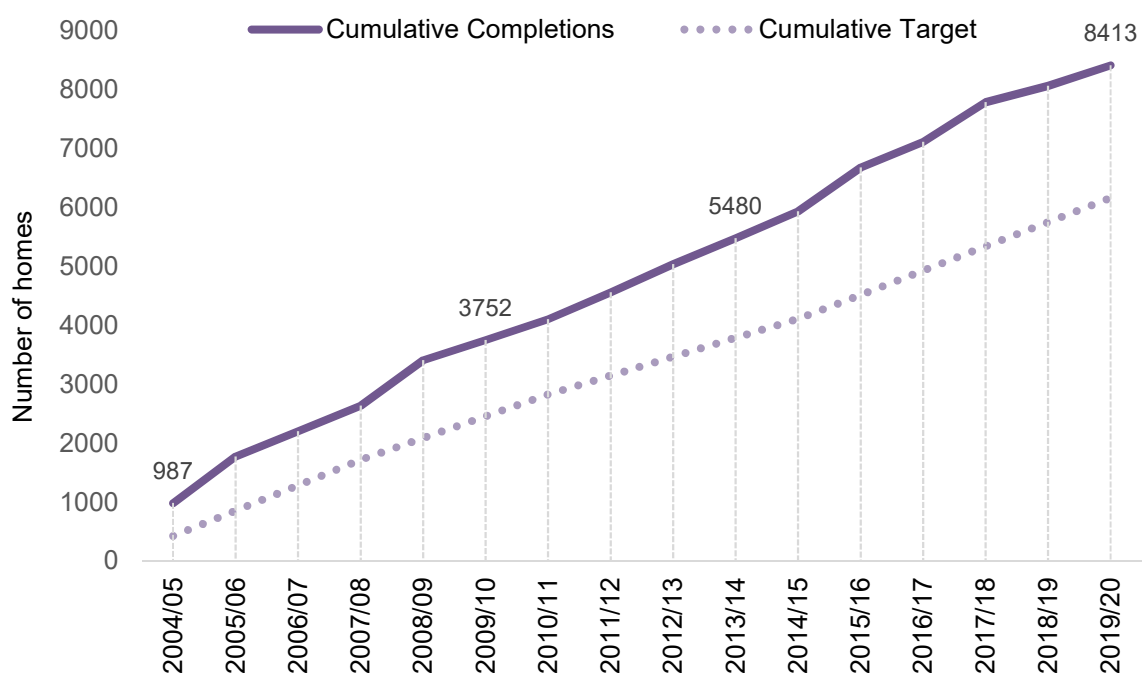


Figure 12: Cumulative over-delivery of new homes against Merton's target 2004-2020



11.11. Merton is not an underperforming borough and over the past 15 years has exceeded its target cumulatively as set out in Figures 11 and 12. Figures 9 and 10 indicate that even despite the significant housing target uplift proposed by the emerging London Plan, and initial net reduction in housing stock proposed as a result of the significant regeneration of three existing housing estates within the borough, Merton is set to not only meet, but continue its historic delivery performance in cumulatively exceeding the proposed target.

12. Addressing backlog

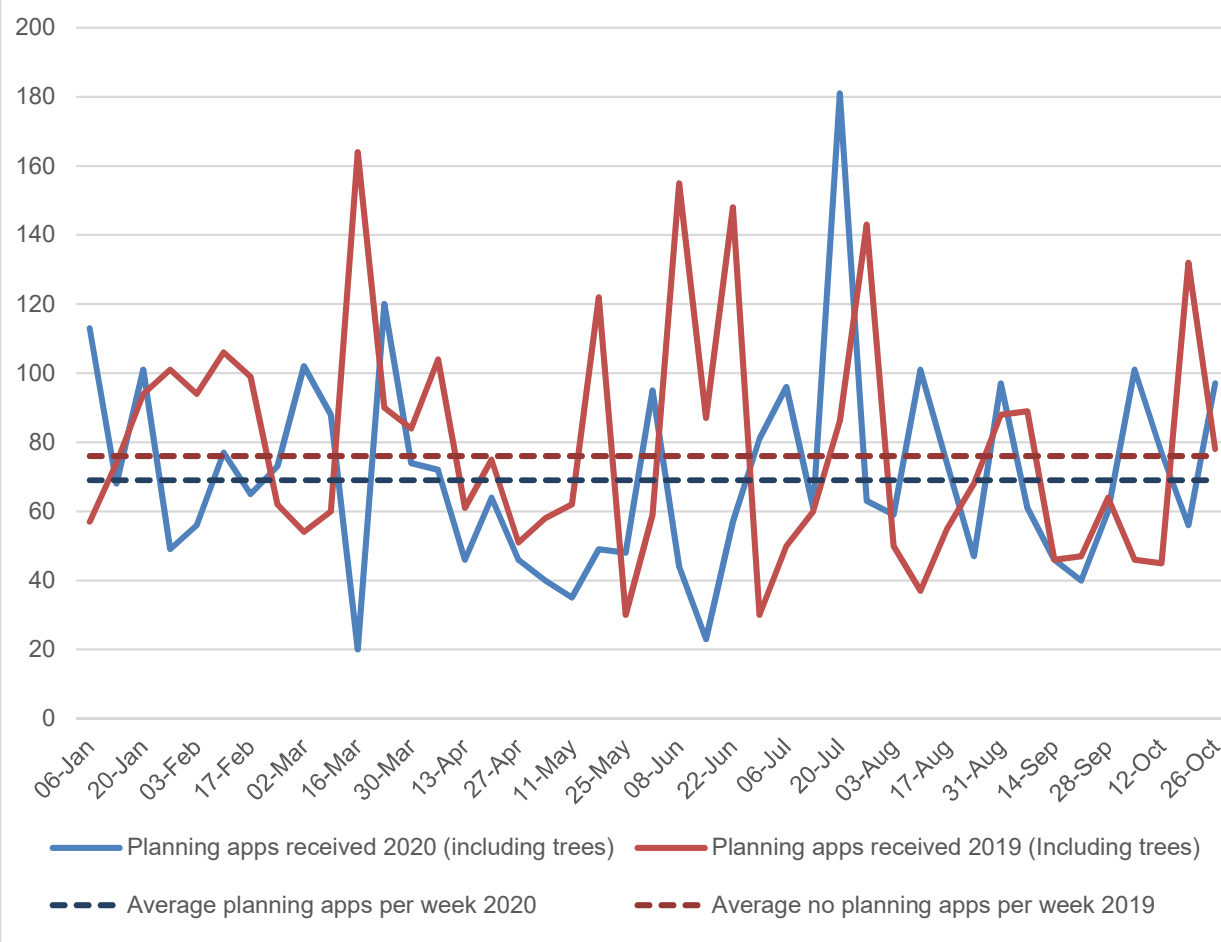
12.1. In accordance NPPF para 73 the adopted London Plan (2016) is up to date as it is less than 5 years old. It also takes account of backlog which is informed by the 2013 SHMA. The Intend to Publish London Plan is at an advanced stage of preparation and its policies should be given appropriate weight which the Council is doing through preparation of Merton's revised Local Plan which will include allocation of sufficient land to address the increased housing figure in the emerging London Plan.

12.2. Furthermore, Merton's historic delivery performance in cumulatively exceeding its housing target contributes towards addressing backlog, as set out in Figures 11 and 12.

13. Impact of Covid-19

- 13.1. It is too early to know what the long-term impacts of Covid-19 will be on the development industry. However the analysis of the numbers of planning applications received by the Council shows that to date (end October 2020) there has been a fairly minimal impact on this, perhaps surprisingly given the scale of the pandemic's impact on all of our lives.
- 13.2. From January to end October 2019, on average 76 planning applications were received by Merton Council each week. This includes planning applications relating to trees.
- 13.3. In the same period in 2020, the Council received on average 69 planning applications per week. The difference of 7 applications per week may be considered de-minimis. This is illustrated in the graph below:

Figure 12: Potential impact of Covid-19 on Merton planning applications received



14. Conclusion

14.1. As set out in this proof of evidence, at the time of this appeal the adopted housing target set out in the statutory development plan for the Council is 411 homes per year (2016 London Plan). This proof of evidence demonstrates that Merton Council can exceed this housing target easily each year.

14.2. This proof of evidence sets out how the Council calculates its 5 year land supply and 15 year housing trajectory including the following points:

14.3. The Council has an up to date Development Plan (the London Plan 2016) which is less than five years old and has a five year land supply against this target.

- 14.4. That small sites, defined as being of less than 0.25ha are presented as actual sites for Year 1 and Year 2, and modelled as providing 261 homes per year for the next 13 years, even though this is likely to be an underestimate of the number of homes delivered on small sites year-on-year, based on actual delivery.
- 14.5. The regeneration of Clarion's three housing estates to provide more than 2,000 new homes over the next 15 years involves the demolition of 1,172 existing homes over the same time period, reducing the net gain in housing for those years.
- 14.6. The Council takes a cautious approach in including sites within the first five years (the five year land supply), only including those where there is evidence of delivery even if the sites have full planning permission.
- 14.7. This proof of evidence also sets out how backlog is addressed and the negligible impact of Covid19 on receipt of planning applications to date.
- 14.8. The proof of evidence also demonstrates how the Council can deliver the emerging London Plan target of 918 new homes per annum over the next 15 years, even prior to the publication of the Council's new London Plan. As set out at the start of this proof of evidence, the contribution of this particular scheme towards the new housing target should be weighed in the overall planning balance
- 14.9. It is noted that the scheme will contribute towards increasing housing supply for more homes in accordance with Policy 3.3 (Increasing Housing Supply) and Table 3.1 of the adopted London Plan 2016.
- 14.10. The Council acknowledges that the housing target is proposed to be dramatically increased under the emerging London Plan (the figure will be nearly doubled to 918 dwellings) and the contribution of the scheme in these circumstances is a benefit which should be weighed in the overall planning balance.

Appendix 1: list of sites included in Merton's five-year land supply

Application No	Net gain	Five-year net gain	20-21	21-22	22-23	23-24	24-25
09/P1303	0	0	0				
12/P0408	0	1	1				
13/P3089	0	0	0				
13/P4058	9	9	9				
14/P0792	8	8	8				
14/P4361	632	632	114	105	150	150	113
14/P4537	20	20			20		
15/P0101	2	2	2				
15/P0636	2	2	2				
15/P0740	0	0	0				
15/P0786	1	1	1				
15/P1411	0	0		0			
15/P1569	6	6	6				
15/P1750	13	13		13			
15/P2177	1	1	1				
15/P3041	1	1	1				
15/P3114	22	22				22	
15/P3293	-2	-2		-2			
15/P3347	0	0	0				
15/P3378	1	1		1			
15/P3573	5	5	5				
15/P3876	2			2			
15/P4016	4	4		4			
15/P4026	2	2	2				
15/P4083	9	9	9				

15/P4305	66	66			22	22	22
15/P4364	2	2	2				
15/P4601	0	0	0				
15/P4633	41	1	1				
15/P4714	8	8		8			
15/P4741	34	0					
16/P0112	0	0	0				
16/P0298	1	1		1			
16/P1208	99	99				55	44
16/P1210	2	2	2				
16/P1211	1	1	1				
16/P1375	1	1	1				
16/P1620	1	1	1				
16/P1901	0	0	0				
16/P1968	17	17	17				
16/P2408	1	1	1				
16/P2585	16	16		16			
16/P2672	129	129		50	79		
16/P2681	2	2	2				
16/P2722	4	4		4			
16/P2810	1	1	1				
16/P2971	14	14		14			
16/P2975	1	1	1				
16/P3051	2	2		2			
16/P3052	1	1		1			
16/P3158	1	1	1				
16/P3404	0	0		0			
16/P3430	74	74	74				

16/P3531	1	1		1		
16/P3551	21	21	21			
16/P3598	25	25			25	
16/P3605	6	6	6			
16/P3648	1	1	1			
16/P3738	134	134			134	
16/P3843	1	1	1			
16/P4009	1	1	1			
16/P4029	1	1		1		
16/P4135	5	5		5		
16/P4140	1	1	1			
16/P4182	1	1	1			
16/P4266	2	2	2			
16/P4333	10	10		10		
16/P4396	1	1	1			
16/P4470	1	1	1			
16/P4581	3	3		3		
16/P4582	-1	-1	-1			
16/P4604	2	2	2			
16/P4618	1	1	1			
16/P4741	0	0	0			
16/P4853	75	75	75			
17/P0039	6	6	6			
17/P0061	1	1		1		
17/P0144	2	2	2			
17/P0253	3.889	3.89	3.89			
17/P0296	20	20			20	
17/P0339	2	2	2			

17/P0372	1	1	1				
17/P0373	1	1	1				
17/P0433	1	1	1				
17/P0463	3	3	3				
17/P0467	1	1		1			
17/P0523	1	1		1			
17/P0527	3	3	3				
17/P0539	3	3	3				
17/P0599	1	1	1				
17/P0657	2	2		2			
17/P0694	1	1		1			
17/P0706	1	1		1			
17/P0763	15	15		15			
17/P0775	1	1	1				
17/P0893	1	1	1				
17/P0916	0	0		0			
17/P0921	1	1	1				
17/P1362	1	1		1			
17/P1383	11	11	11				
17/P1537	30	30	30				
17/P1555	1	1		1			
17/P1610	-2	-2	-2				
17/P1685	1	1		1			
17/P1717	-467	-25			-25		
17/P1717	341	33					33
17/P1718	-97	-97		-32	-32	-33	
17/P1718	179	105			54	51	
17/P1721	1535	105					105

17/P1928	-3	-3	-3			
17/P2025	1	1		1		
17/P2280	1	1	1			
17/P2332	1	1		1		
17/P2372	8	8	8			
17/P2396	4	4	4			
17/P2397	4	4		4		
17/P2428	0	0	0			
17/P2459	6	6	6			
17/P2541	1	1	1			
17/P2577	0	0	0			
17/P2729	1	1		1		
17/P2802	1	1	1			
17/P2835	1	1		1		
17/P2917	0	0	0			
17/P3001	1	1		1		
17/P3153	2	2		2		
17/P3208	8	8		8		
17/P3218	1	1	1			
17/P3254	-1	-1	-1			
17/P3256	3	3		3		
17/P3331	4	4	4			
17/P3446	1	1	1			
17/P3527	3	3	3			
17/P3551	23	23			23	
17/P3574	1	1	1			
17/P3576	1	1	1			
17/P3635	1	1	1			

17/P3637	0	0	0			
17/P3656	1	1	1			
17/P3691	1	1		1		
17/P3701	1	1		1		
17/P3709	1	1		1		
17/P3717	1	1		1		
17/P3734	3	3	3			
17/P3735	6	6	6			
17/P3807	3	3	3			
17/P3813	1	1		1		
17/P3914	-2	-2	-2			
17/P3956	0	0		0		
17/P3976	2	2	2			
17/P3989	2	2	2			
17/P3991	1	1	1			
17/P4078	1	1		1		
17/P4083	12	12	12			
17/P4158	0	0		0		
17/P4190	1	1	1			
17/P4268	1	1	1			
17/P4379	3	3	3			
17/P4387	6	6	6			
18/P0032	0	0		0		
18/P0037	1	1	1			
18/P0228	1	1	1			
18/P0278	1	1	1			
18/P0281	1	1		1		
18/P0290	1	1	1			

18/P0483	1	1	1			
18/P0502	1	1	1			
18/P0553	1	1	1			
18/P0562	3	3	3			
18/P0566	1	1	1			
18/P0623	0	0		0		
18/P0671	1	1	1			
18/P0722	1	1	1			
18/P0739	1	1		1		
18/P0761	-1	-1	-1			
18/P0882	10	10		10		
18/P0892	2	2		2		
18/P0893	1	1	1			
18/P0897	-1	-1	-1			
18/P0914	1	1	1			
18/P1052	9	9		9		
18/P1058	3	3	3			
18/P1073	1	1	1			
18/P1164	1	1		1		
18/P1167	2	2	2			
18/P1200	2	2		2		
18/P1227	0	0		0		
18/P1286	2	2	2			
18/P1356	1	1		1		
18/P1418	1	1		1		
18/P1468	2	2	2			
18/P1474	1	1	1			
18/P1566	1	1	1			

18/P1578	1	1	1			
18/P1598	1	1	1			
18/P1687	1	1		1		
18/P1725	1	1		1		
18/P1834	0	0	0			
18/P1909	1	1		1		
18/P1938	10	10		10		
18/P1966	2	2		2		
18/P2066	1	1	1			
18/P2109	1	1	1			
18/P2207	9	9		9		
18/P2211	7	7		7		
18/P2224	6	6		6		
18/P2234	1	1		1		
18/P2254	1	1		1		
18/P2424	1	1	1			
18/P2565	0	0	0			
18/P2570	9	9	9			
18/P2619	32	32			32	
18/P2625	0	0		0		
18/P2672	1	1		1		
18/P2722	1	1		1		
18/P2781	0	0		0		
18/P2911	0	0		0		
18/P2915	-1	-1	-1			
18/P2943	2	1	1			
18/P2948	2	2		2		
18/P2966	4	4		4		

18/P2990	12	12		12		
18/P3059	9	9	9			
18/P3081	1	1		1		
18/P3128	2	2	2			
18/P3163	1	1	1			
18/P3195	1	1	1			
18/P3386	2	2		2		
18/P3478	2	2		2		
18/P3499	0	0		0		
18/P3533	1	1	1			
18/P3546	1	1	1			
18/P3622	1	1		1		
18/P3632	1	1		1		
18/P3673	1	1		1		
18/P3693	1	1		1		
18/P3733	1	1		1		
18/P3780	11	11	11			
18/P3783	2	2		2		
18/P3787	10	10			10	
18/P3794	1	1	1			
18/P3998	2	2		2		
18/P4078	2	2	2			
18/P4132	2	2	2			
18/P4148	3	3		3		
18/P4168	1	1		1		
18/P4204	8	8	8			
18/P4262	-4	-4	-4			
18/P4284	1	1		1		

18/P4341	1	1		1		
18/P4343	0	0		0		
18/P4357	1	1		1		
18/P4483	2	2		2		
18/P4501	1	1		1		
18/P4548	1	1		1		
19/P0055	0	0	0			
19/P0122	1	1	1			
19/P0125	2	2		2		
19/P0140	0	0		0		
19/P0146	2	2		2		
19/P0172	-2	-2		-2		
19/P0179	1	1	1			
19/P0276	1	1		1		
19/P0280	6	6		6		
19/P0369	1	1	1			
19/P0419	0	0		0		
19/P0420	0	0		0		
19/P0427	1	1		1		
19/P0428	6	6		6		
19/P0445	1	1		1		
19/P0498	4	4		4		
19/P0544	1	1		1		
19/P0581	6	6		6		
19/P0583	6	6	6			
19/P0597	1	1		1		
19/P0635	1	1			1	
19/P0714	1	1		1		

19/P0790	1	1	1	
19/P0807	1	1		1
19/P0808	9	9	9	
19/P0829	1	1	1	
19/P1136	-1	-1	-1	
19/P1173	1	1	1	
19/P1235	1	1	1	
19/P1496	1	1	1	
19/P1550	3	3		3
19/P1557	-1	-1	-1	
19/P1603	1	1	1	
19/P1678	1	1	1	
19/P1794	5	5		5
19/P1845	0	0	0	
19/P1852	-608	-84		-84
19/P1966	3	3		3
19/P1981	3	3	3	
19/P2070	2	2	2	
19/P2120	26	26		26
19/P2127	5	5		5
19/P2287	8	8	8	
19/P2289	2	2		2
19/P2342	6	9	9	
19/P2382	2	2	2	
19/P2385	1	1		1
19/P2424	0	0	0	
19/P2432	1	1		1
19/P2448	1	1		1

19/P2462	1	1		1		
19/P2611	3	3		3		
19/P2612	1	1		1		
19/P2613	7	7		7		
19/P2683	1	1		1		
19/P2708	1	1			1	
19/P2714	1	1		1		
19/P2715	1	1			1	
19/P2747	20	20			20	
19/P2847	3	3	3			
19/P2899	1	1		1		
19/P2936	2	2	2			
19/P2945	1	1		1		
19/P2947	2	2			2	
19/P3181	1	1		1		
19/P3271	8	8		8		
19/P3302	1	1		1		
19/P3324	0	0		0		
19/P3365	5	5			5	
19/P3400	8	8		8		
19/P3434	1	1		1		
19/P3468	1	1		1		
19/P3474	3	3		3		
19/P3715	1	1		1		
19/P3744	1	1			1	
19/P3764	7	7			7	
19/P3767	1	1			1	
19/P3782	1	1			1	

19/P3820	2	2			2	
19/P3836	6	6			6	
19/P3842	1	1	1			
19/P3850	0	0		0		
19/P3907	2	2			2	
19/P4029	1	1			1	
19/P4046	18	18				18
19/P4047	21	21				21
19/P4048	36	36				36
19/P4050	18	18				18
19/P4084	2	2			2	
19/P4086	1	1		1		
19/P4101	0	0		0		
19/P4124	1	1			1	
19/P4145	-1	-1			-1	
19/P4255	-1	-1		-1		
19/P4266	70	70		70		
19/P4326	5	5			5	
20/P0028	1	1		1		
20/P0149	-1	-1			-1	
20/P0185	1	1			1	
20/P0205	2	2			2	
20/P0282	1	1			1	
20/P0422	3	3		3		
20/P0452	1	1		1		
20/P0475	6	6			6	
20/P0489	1	1		1		
20/P0490	-1	-1			-1	

20/P0555	0	0			0		
20/P0758	1	1		1			
20/P0776	1	1		1			
20/P0792	5	5	5				
20/P0971	1	1	1				
20/P1060	25	25			25		
20/P1065	4	4			4		
20/P1073	1	1	1				
20/P1256	-1	-1			-1		
20/P1371	105	105				55	50
20/P1667/NEW	9	9				9	
20/P1688/NEW	20	20				20	
20/P2445	8	8					8
20/P3237	92	92				52	40
White Hart, Kingston Road, Wimbledon	50	50					50
Birches Close	40	40					40
Chaucer Centre	60	60				30	30
Morden town centre regen phase 1	152	100					100
Worsfold House	60	60				30	30
Baltic Close	2	2			2		
Mitcham Fire Station	2	2			2		
Mitcham CAB	11	11				11	
Wilson Hospital	11	11				11	
Gifford House	24	24				24	
Wimbledon Chase station	62	62					62
Battle Close	75	75				35	40

Imperial Fields Tooting and Mitcham Hub	77	77					77
Station Road, Colliers Wood	100	100				50	50
Wimbledon Park pre-app	106	36					36
YMCA, The Broadway	141	141				136	5
Colliers Wood pre-app	200	100					100

