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Dear Sir / Madam

**Estates Local Plan Main Modifications  
Representations made on behalf of Clarion Housing Group**

Further to the publication of the Main Modifications to the Estates Local Plan (September 2017) for consultation we write to make formal representations to the ongoing consultation on behalf of Clarion Housing Group.

As confirmed within previous representations that have been made at earlier consultation stages of the preparation of the Estates Local Plan and during the Examination Hearing Sessions, Clarion Housing Group is supportive of the approach set out in the Plan in general terms.

As identified below there are some areas where we suggest some further minor amendments to the draft policies and / or supporting text to add further clarity. Text that we suggest adding to the Plan is shown in red (i.e. red text). Where it is recommended to remove text this is shown as a red strike through (i.e. ~~red text~~).

Modification reference: MM3; Policy: OEP2 Strategy – Justification; Pages 37

Suggested Modification:

*“The Estates Local Plan is a 10-15 year plan and the priority is to keep communities together and rehouse existing residents. The quantum and mix of affordable housing to be provided will be informed by planning policies in the Statutory Development Plan that are in place at the time of ~~each the planning~~ application for planning permission for ~~each phase of development~~ over the 10-15 year timeframe. ~~The Council will also~~ Where an application is submitted for multiple phases the Council will seek ~~enter into~~ a review mechanism as part of a s106 agreement ~~with applicants~~ to reconsider the viability of each phase as development is delivered.”*

Justification:

The above amendments are proposed in order to provide further clarity about the approach to securing affordable housing delivery over the Plan period. Where an application for planning permission (this would include outline planning applications) is submitted for multiple phases, a review mechanism can be sought. The amended wording would add clarity about this.



Modification reference: MM4; Policy: OEP3 Urban Design – Justification; Pages 39, Paragraph 2.42

Suggested Modification:

*“Building Lines*

*New development must connect easily with the surrounding area and be easy to get around, not present barriers. Traditional streets with buildings lining each side of the street, will contribute to defining spaces and the creation of clearly defined routes. Irregular building lines ~~and building heights~~ undermine this and should therefore be avoided.”*

Justification:

Guidelines on building heights are covered in detail in the site specific policies for each estate (Policy EP H8, Policy EP E8 and Policy EP R8) elsewhere within the Plan. This supporting text relates to building lines, rather than heights and this is clear when the paragraph is read as a whole. Reference to heights should therefore be removed.

Modification reference: MM8; Policy: EPE4 (Land Use); Page 70

*“a) The land use for the estate will remain predominantly residential with open space, associated landscaping provision and with provision of no fewer than the existing number of affordable ~~habitable rooms or floorspace homes~~, non-residential uses and designated open space to meet relevant planning policies.”*

Justification:

To be consistent with the requirements of Policy 3.14 of The London Plan (2016) and the Mayor of London’s Affordable Housing and Viability Supplementary Planning Guidance (SPG) published August 2017.

Modification reference: MM8; Policy: EPE4 (Land Use); Page 70, Paragraph 3.62.

*“~~3.62~~ Development proposals should ~~accord with~~ ~~have regard to~~ the London Plan density matrix and any other emerging or updated relevant policy requirements. Eastfields estate has a ‘Suburban’ setting according to the London Plan density matrix criteria. The key characteristics of a Suburban setting as set out in the London Plan are areas with predominantly lower density development such as detached and semi-detached housing, predominantly residential, small building footprints and typically buildings of 2-3 storeys. The centre of the estate is 1,200m walking distance from Mitcham Clock Tower, therefore being more than 800m from the nearest District Centre. As outlined in the London Plan, the density matrix should be used flexibly and in conjunction with other development plan policy requirements, ~~particularly as this is a large site as defined in London Plan 3.7.~~”*

Justification:

To provide further justification as to why the London Plan Density Matrix should be used flexibly given the site is a large site that can accommodate higher densities.

Modification reference: MM15; Policy: EPH3(b) (Movement and Access); Page 110

*“e) Vehicular ~~and cycle~~ parking must, in the first instance, be provided on-street and well integrated into the street design. Any additional parking required can be provided in parking courts or under landscaped podiums. Proposals must be accompanied by a comprehensive parking management strategy.”*

Justification:

Resident cycle parking should be provided in secure, covered and conveniently sited position with good access to the street as suggested by paragraph 9.5 of the LBM Sites and Policies Plan DPD, and should be integrated and accessible as required by London Plan Policy 6.9. We therefore consider that cycle parking should not be referenced in this part of the policy, as providing all cycle parking on-street in the first instance would not be consistent with other Development Plan policies. This reference should therefore be deleted. If it is considered necessary to include some reference to cycle parking, the following wording could be used: *“Cycle parking must be provided in accordance with the standards set out in the London Plan.”*

Modification reference: MM16; Policy: EPH4 (Land Use); Page 110

*“a) The primary land use for the site will be residential, to accord with the predominant land use of the existing site and surrounding area and the existing number of ~~affordable habitable rooms / floorspace homes~~ should be re-provided. Non- residential uses may be appropriate to support employment, community activities and street vibrancy.”*

Justification:

To be consistent with the requirements of Policy 3.14 of The London Plan (2016) and the Mayor of London’s Affordable Housing and Viability Supplementary Planning Guidance (SPG) published August 2017.

*“3.168 High Path and most of the surrounding area streets are predominately residential. High Path is located within an area with a good level of Public Transport Accessibility (PTAL). Development proposals must make more efficient use of land by providing schemes which are higher than the current density and result in improving the urban design quality of the estate. Development proposals should ~~accord with~~ have regard to the London Plan density matrix and any other emerging or updated relevant policy requirements. As outlined in the London Plan, the density matrix should be used flexibly and in conjunction with any other emerging or updated relevant policy requirements particularly as the site is a large site as defined in Paragraph 3.7 of the London Plan. High Path estate has an ‘Urban’ setting according to the London Plan density matrix criteria. The key characteristics of an Urban setting as set out in the London Plan are areas with predominantly dense development such as terraced housing and mansion blocks, a mix of different uses, medium building footprints, buildings of 2-4 storeys and located within 800m walking distance of a District Centre or along a main arterial route. The centre of the estate is 970m walking distance from Colliers Wood Tube station (the focal point of the proposed new District Centre), but closer to the edge of the proposed District Centre and adjacent to two main arterial routes. It is also 840m from the edge of the Wimbledon Major Centre.”*

Justification:

To provided further justification as to why the London Plan Density Matrix should be used flexibly given the site is a large site that can accommodate higher densities.

Modification reference: MM19; Policy: EPH7 (Landscape); Page 126

*“a) Retention of the existing mature tree groups and street trees indicated on the diagram for Policy ~~HE7~~ should help to form the basis of new open spaces, a network of biodiversity enhancing green corridors across the estate, and assist with managing air and noise pollution, slowing rainfall runoff and mitigating the urban heat island effect.”*

Justification:

The wrong policy is referenced. The correct diagram is for Policy EP H7.

*“~~3.199~~ The case for retention or felling of trees ~~other than those groups specifically identifies in this policy on the estate~~ should be set out within an arboricultural impact assessment submitted with the planning application taking account of Merton’s Sites and Policies Plan Policy DM O2 (b) to (f). ~~will be based on the tree survey undertaken by the Council’s arboricultural officer.~~ 3.200 Proposals should ensure the provision of a good variety and quantity of street trees.”*

Justification:

This wording relates to the previous draft of the policy. As specific trees are no longer identified for retention within the Policy, we request that reference to Sites and Policies Plan Policy DM02 is included as per the approach taken in the supporting text to Policy EPE7 and later in paragraph 3.201.

An arboricultural impact assessment and tree survey would need to be submitted with planning application(s) to consider the impact of proposals on existing trees.

Modification reference: MM20; Policy: EPH8 (Building Heights); Page 126

*“a) **General building height:** The existing estate suffers from a mix of discordant characters, due to the wide variety in heights, styles and siting of the buildings. Redevelopment of the estate must create a consistent character that fits in harmoniously with the surrounding development. A consistency in building heights is important in achieving this. The prevailing height across the estate must be lower than the existing heights along Morden Road and Merantun Way, but ~~be sensitive to marginally higher than~~ the existing heights in the more sensitive areas of High Path, Abbey Road, Rodney Place and Merton High Street.”*

Justification:

This is proposed to provide a clearer wording as ‘marginally higher’ could result in interpretation issues. As this site is defined as a large site in accordance with London Plan Policy 3.7 it can create its own character therefore the suggested wording would be clearer.

Modification reference: MM24; Policy: EPR4 (Land Use); Page 162

*“a) The predominant land use for this estate is to be retained as residential with the re-provision of the existing number of affordable ~~habitable rooms / floorspace homes~~ and the existing community room.”*

Justification:

To be consistent with the requirements of Policy 3.14 of The London Plan (2016) and the Mayor of London’s Affordable Housing and Viability Supplementary Planning Guidance (SPG) published August 2017.

*“3.269 Ravensbury estate is located within an area with a low level of Public Transport Accessibility. Development proposals need to make more efficient use of land by providing schemes which are higher than the current density and result in improved urban design quality of the estate. Development proposals must should ~~accord with~~ have regard to the London Plan density matrix and any other emerging or updated relevant policy requirements...”*

Justification

To align with the London Plan which states that the Density Matrix should be applied flexibly.

#### Glossary

We note that the definitions for urban and suburban and urban are not consistent with the London Plan definitions. The definitions should be amended to mirror the London Plan definitions to avoid confusion.

#### **Summary**

The Council's support for the regeneration and intensification of the three Estates is welcomed, and the alterations made to date as a result of the Hearing Sessions are supported generally. It is considered that the above minor amendments will add further clarity to the Plan and ensure conformity with the London Plan.

Should you have any queries please do not hesitate to contact me or my colleague Catherine Bruce on 020 3320 8286 / [cbruce@savills.com](mailto:cbruce@savills.com). We look forward to receiving convenient dates to meet to discuss the evolving DPD.

Yours faithfully



Samruti Patel