

Committee: Borough Plan Advisory Committee

Date: 11 January 2018

Wards: Abbey, Figges Marsh & Ravensbury

Subject: Adoption of Merton's Estates Local Plan as part of Merton's Local Plan

Lead officer: Director for Environment and Regeneration, Chris Lee

Lead member: Cabinet Member for Regeneration, Environment & Housing, Councillor Martin Whelton,

Contact officers: Future Merton strategic policy manager, Tara Butler

Principal Spatial Planner, Valerie Mowah

Recommendations:

- A. That Borough Plan Advisory Committee recommends that Cabinet resolves to recommend adoption of Merton's Estates Local Plan to council (07 February 2018) and associated Sustainability Appraisal, as part of Merton's statutory Local Plan and subsequent updating of Merton's statutory Policies Map to include the Estates Local Plan area, to which Estates Local Plan policies apply.
 - B. That Borough Plan Advisory Committee advises that authority be delegated to the the Director of Environment and Regeneration to deal with all the necessary adoption documents and other consequential matters in accordance with the appropriate Regulations.
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1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. This report recommends the adoption of Merton's Estates Local Plan as part of Merton's statutory Local Plan. This follows the Plan's successful examination by an independent planning inspector and the publication of the Inspector's final report.
- 1.2. If adopted, the Estates Local Plan will be one of the key documents guiding planning decisions in the borough, alongside Merton's adopted Core Planning Strategy 2011 and the South London Waste Plan 2012, and Sites and Policies Plan and Policies Map 2014 concerning the regeneration of Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Mitcham/ Morden) estates.
- 1.3. The Plan, associated sustainability appraisal and Inspector's report are published on the council's website and as appendices to this report.
- 1.4. A separate report to this meeting makes recommendations to councillors on delivering regeneration across the three estates. The adoption of the estates local plan can be considered independently of this.

2 DETAILS

- 2.1. The core role of the Estates Local Plan is to guide development in the relevant areas, both for applicants bringing forward proposals and for members sitting on the Planning Applications Committee (PAC) when they consider those proposals. Without adopting such a document, it will be harder for developers (in this case Clarion) to have confidence that the Committee will support their proposals and they may therefore be less willing to commit to the investment needed. The Local Plan also helps the PAC to ensure that proposals meet the Council's broader regeneration and community objectives.

Plan preparation and inspector's report.

- 2.2. In July 2014 Council resolved to start an Estates Local Plan and the first council consultation was started in November 2014. The plan has been informed by feedback from more than nine months of public consultation, local and national research and the latest data from the Census 2011 and prepared in line with statutory regulations.
- 2.3. In November 2016 Cabinet and Council approved the Plan for submission to the Secretary of State.
- 2.4. In March 2017, the Plan was submitted to the Secretary of State, who appointed an independent inspector to examine the plans. The inspector held a three day public hearing across two weeks in July 2017 where residents, landowners, and others who participated in making the plan participated in the public hearings
- 2.5. During the public hearings, the inspector recommended 30 modifications to the Plan. These changes were either recommended to the inspector by the council or helped to make the council's original policy position clearer.
- 2.6. The inspector asked the council to consult on these modifications for six weeks so that anyone who did not attend the public hearings would be aware of the changes he was recommending and would have the opportunity to write to him and tell him what they thought. The council published the 30 changes on Merton's website and consulted on these between 26th September and 07 November 2017, writing to everyone who had participated during the 3 years of plan preparation to let them know.
- 2.7. Having considered the 9 consultation responses received, in **December 2017**, the inspector issued his report, which states that the Plan is sound and can be adopted, subject to incorporating the modifications that were included for public consultation. The Inspector's report made further amendments to a few of these modifications that were consulted on; these are clearly identified in the Inspector's report.

Contents of the Plan

- 2.8. Part 1 outlines the background to the Plan. It sets out its relationship to other plans and policies, the key drivers for the Plan, the case for regeneration, the overall design principles and the council's vision for each of these new neighbourhoods. It also defines the geographic area where the Plan applies, known as the Policies Map
- 2.9. Part 2 sets out the overarching policies for the Plan. The council's Vision for the three estates (OEP1), the Strategy through which the vision will be achieved (OEP2) and the Urban Design Principles which will be used in the process (OEP3). They will be used both as a guide to the high level aspirations of the Council and, along with the more detailed policies in part 3, used to assess planning applications.
- 2.10. Part 3, the main part of the Plan, looks at each of the three estate neighbourhood in turn. It proposes a set of detailed policies to guide development. This is based on a detailed site analysis of the current neighbourhoods and a study of the historical context (Appendix 3 of the Plan) of the three estates.
- 2.11. Part 4 sets out detailed design requirements for planning applications to enable the delivery of site specific policies and ensure design consistency across each estate. The Plan ends by outlining how it will be delivered and implemented.
- 2.12. The Sustainability Appraisal / Strategic Environmental Assessment published alongside the Estates Local Plan demonstrates how the Plan has been informed by social, environmental and economic criteria as it has been created. This ensures that the final plan will facilitate sustainable development. Health impacts and equalities impacts have also been considered in the creation of the plan; the Health Impact Assessment and the Equalities Impact Assessment are available on Merton Council's website via www.merton.gov.uk/estatesplan and available on request to future.merton@merton.gov.uk or 020 8545 3837

Delegated authority

- 2.13. If the council resolves to adopt Merton's Estates Local Plan, it will be redesigned and printed to ensure that it is clear and easy to read and navigate. There are also a number of statutory adoption documents and other procedures that the council will need to undertake, such as notifying the people who participated in making the Plan of its adoption.
- 2.14. It is recommended that these statutory matters be delegated to the Director of Environment and Regeneration.

3 ALTERNATIVE OPTIONS

- 3.1. The main alternative option is not to adopt Merton's *Estates Local Plan* as part of Merton's Local Plan. This is not recommended for the following reasons:

- 3.2. The Government has made proactive support for development that creates new homes a priority, and has substantially restructured the planning system to do so. Merton's Estates Local Plan has been found sound by an independent inspector and prepared using recent consultation feedback, up-to-date evidence and is in conformity with the London Plan and national policy. In accordance with the National Planning Policy Framework 2012, the draft document can still be used to influence planning applications
- 3.3. LBM officers have sought legal advice from counsel on the most robust and efficient strategic planning framework process to guide the estates regeneration process. LBM Officers have been advised by counsel that preparation and adoption of a statutory Local Plan will provide the most appropriate planning process to ensure robust consultation with residents, adjoining landowners and anyone else who might be affected. To not adopt Merton's Estates Local Plan would result in the absence of an essential planning policy element to guide the regeneration of the three estates and assist in land assembly to facilitate regeneration delivery.

4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. Merton's Sites and Policies Plan was started in November 2014 and since then has been through five stages of public consultation (six weeks each):
- 4.2. September - November 2014 - **Stage 1 Issues and Options** Merton Council asked residents, businesses and anyone else who was interested to have their say on proposals for Ravensbury (Morden), High Path (South Wimbledon) and Eastfields (Mitcham) estates
- 4.3. February-March 2016 - **Stage 2 Draft Estates Local Plan** The consultation on the council's draft plan for the estates of Eastfields, High Path and Ravensbury took place.
- 4.4. December 2016 - February 2017 – **Stage 3 Pre- Submission publication** to give those who still wish to change the Plan the opportunity to send their comments to the independent Planning Inspector for him to consider.
- 4.5. March 2017 - **Estates Local Plan Submission** - to give those who still wish to change the Plan the opportunity to send their comments to the independent Planning Inspector for him to consider.
- 4.6. September - November 2017 - **Public consultation after the Hearings** to give those who did not attend the public hearings in July 2017 an opportunity to tell the inspector what they think of the 30 Main Modifications to the Plan that he recommended at the hearings.
- 4.7. All of the consultation responses have been considered and the plan has been amended accordingly at each stage. The plan is accompanied by a Statement of Consultation, setting out what people and organisations told us about the plans, and what actions have taken place as a result of their comments. All of the responses received are available to view on Merton's website via:
<http://www2.merton.gov.uk/environment/planning/planningpolicy/localplan/estatesplan.htm>

- 4.8. During the course of the plan's preparation, officers have proactively engaged with community groups, residents, other interested parties, and councillors representing Figges Marsh, Abbey and Ravensbury wards where the three estates are situated.

5 TIMETABLE

- 5.1. Merton's Estates Local Plan will be considered and recommended for adoption at the following meetings: Borough Plan Advisory Committee (11th January 2018); Cabinet (15th January 2018); Council (7th February 2018). If council resolve to adopt the Estates Local Plan and Map on 7th February 2018, it will then be used to determine planning applications for the regeneration of the three estates.

6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 6.1. To minimise the impact of this regeneration programme on council taxpayers across Merton, the council have negotiated with Clarion Housing Group to indemnify the Council for costs associated with delivering the regeneration programme and related matters including the costs of the Inquiry for the Estates Local Plan.

7 LEGAL AND STATUTORY IMPLICATIONS

- 7.1. Merton's Estates Local Plan has been prepared in accordance with the Town and Country Planning Act 1990 (as amended), the Town and Country Planning (Local Development)(England) Regulations 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. The Estates Local Plan is also in conformity with the National Planning Policy Framework 2012, the London Plan 2016 and other associated guidance.
- 7.2. If the council were to resolve to adopt the Plan and Map on 7th February 2018, it would become part of Merton's Local Plan, together with Merton's Core Planning Strategy 2011, Sites and Policies Plan and Policies Map 2014, and the South London Waste Plan 2012. Following adoption, there would be a six week period for people to challenge the Plan through judicial review.

8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

- 8.1. An Equalities Impact Assessment has been prepared in conjunction with Merton's *Estates Local Plan*.
- 8.2. The Plan has also been informed by a ongoing Strategic Environmental Assessment and Sustainability Appraisal, prepared in parallel with each stage of the plan and used to ensure that the Plan delivers social, economic and environmental benefits equally. Some of the objectives that the Plan has been appraised against relate to improving community cohesion.

9 CRIME AND DISORDER IMPLICATIONS

- 9.1. The Metropolitan Police have been engaged in all stages of the preparation of Merton's *Estates Local Plan*, and have made representations on several issues.
- 9.2. The Sustainability Appraisal, prepared in parallel with each stage of the plan to ensure that the plan delivers social, economic and environmental benefits assesses the plan against objectives to reduce crime and the fear of crime.

10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 10.1. Unlike some authorities embarking on comprehensive estate regeneration, Merton Council does not own the housing stock, and little of the land surrounding the estates. The Estates Local Plan is therefore its key lever in steering and controlling the regeneration, supported by legal responsibilities placed on Clarion through its agreements with the Council.
- 10.2. There is a risk that should the Estates Local Plan not be adopted, planning decisions concerning regeneration of the three estates will be challenged where decision-makers are using a development plan that does not set out the council's growth expectations, rooted in policies regarding site layout and access, open space, connectivity and services.
- 10.3. Additionally, the council's ability to successfully bid for funding associated with the regeneration of the three estates, for new local infrastructure to be delivered through the planning system, may be called into question if its local development plan used to determine planning applications does not include specific policies and a strategy setting out and guiding regeneration of the three estates

11 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

- Appendix A: Inspector's final report (December 2017) – Merton's Estates Local Plan
- Appendix B: Merton's Estates Local Plan – adoption version (available at the meeting and on Merton Council's website via <https://www2.merton.gov.uk/planningpolicy/localplan/estatesplan> and on request by contacting 020 8545 3837)
- Appendix C - The sustainability appraisal of Merton's Estates Local Plan (available on Merton Council's website via <https://www2.merton.gov.uk/planningpolicy/localplan/estatesplan> and on request by contacting 020 8545 3837)



The Planning Inspectorate

Report to the Council of the London Borough of Merton

by Nicholas Taylor

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 18 December 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Merton Estates Local Plan

The Plan was submitted for examination on 30th March 2017

The examination hearings were held between 4th and 6th July 2017

File Ref: PINS/T5720/429/7

Abbreviations used in this report

CHG	Clarion Housing Group
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
MM	Main Modification
ELP	Merton Estates Local Plan
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SE	Sport England
SPG	Supplementary Planning Guidance
SPP	Merton Sites and Policies Plan

Non-Technical Summary

This report concludes that the London Borough of Merton Estates Local Plan (ELP) provides an appropriate basis for the planning of the specific area covered by the plan, provided that a number of main modifications (MMs) are made to it. Merton Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

All the MMs were proposed by the Council, amended in some cases by me, and were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Introduction of three new over-arching policies, setting out the vision, strategy and urban design principles for the plan;
- Inclusion within the relevant policies for each estate for re-provision of affordable housing;
- Amendments to various policies, and introduction of a new appendix, to ensure clear consistency with and cross-referencing to other parts of the development plan, including the London Plan, and with national planning policy and guidance;
- Amendments to various policies to ensure internal consistency within the plan, whilst recognising the distinctiveness of the three estates and providing the appropriate balance between certainty and flexibility;
- Deletion of 'Further guidance' and incorporation of its content where appropriate within each policy or its Justification;
- Deletion, or inclusion in a more appropriate way, of references to locations and issues outside the plan boundary; and
- Clarification that part 4 of the plan sets out information to support submission of applications for planning permission.

Introduction

1. This report contains my assessment of the ELP in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The London Borough of Merton Pre-Submission Estates Local Plan, submitted in March 2017, is the basis for my examination. It is the same document as was published for consultation between December 2016 and February 2017. It should be noted that, since then, the Council has published several "rolling" versions of the plan, incorporating its own proposed, successive additional modifications. Where these are not incorporated within, or superseded by, MMs, I consider that they do not affect the soundness of the plan and I have

not commented upon them in this report. Any such additional modifications are a matter for the Council on adoption of the ELP.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any MMs necessary to rectify matters that make the plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form MM1, MM2, MM3 etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in the light of those I have made limited amendments to the detailed wording of some of the main modifications. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have referred to these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, although the plan itself contains numerous maps and diagrams, the only proposed change to the formal policies map is the definition of the boundaries of the three separate and distinct areas covered by the plan within the Borough. Consequently, the MMs do not have any direct implications for this change to the policies map.

Assessment of Duty to Co-operate

6. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The boundaries of the three areas covered by the ELP are drawn tightly round three separate and distinctive housing estates in different parts of the Borough: Eastfields, High Path and Ravensbury.
7. Each estate predominantly comprises former local authority housing which has been transferred to the Clarion Housing Group (CHG), a registered housing provider, through a Stock Transfer Agreement which carried with it certain obligations. The Council has collaborated with and consulted residents, CHG, statutory consultees and other stakeholders on strategic and other matters concerning the future of the estates and on the preparation of the ELP.
8. Overall, taking account of the type and content of the plan and its limited geographical coverage, I am satisfied that where necessary the Council has

engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

9. The ELP is intended to guide the regeneration, in whole or in part, of the three estates, with the aim of creating well designed, high quality neighbourhoods. As submitted, it is structured around sets of policies for each estate, covering similar topics and following a common format. Additional sections of the plan cover common themes, such as key drivers, vision, design requirements and delivery, implementation and monitoring, together with supporting material in three appendices.
10. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified two main, cross-cutting issues upon which the soundness of the Plan depends. Broadly, these relate to issues concerning the overall plan and those concerning the policies specifically relating to each of the three estates. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Whether the plan, in respect of its vision, strategy, urban design focus and certain matters common to all three estates, has been positively prepared, is justified, effective and consistent with national and local policy and guidance?

Relationship with the wider development plan

11. Regulations 8 (4) and (5) require that the plan should be consistent with other parts of the development plan. The ELP's subject matter – three geographically separate estates, islands, as it were, within the borough, but inextricably linked in terms of their regeneration – poses challenges with regard to the purpose, structure and clarity of the plan. The Council sees it as largely a design-led document, intended to set out a distinctive vision to guide place-making in each estate, whilst providing an appropriate degree of flexibility to developers. However, as a statutory local plan, it is more than a series of masterplans or design briefs and seeks to provide clear policies governing the regeneration process.
12. As submitted, the ELP is unsound in that it fails to clearly articulate its relationship with the wider development plan in all respects, including where reliance is to remain with policies in other plans. This is more complex here because not only the Mayor's London Plan but also the Council's borough-wide Core Planning Strategy and its Sites and Policies Plan (SPP) will also continue, until replaced, to wash over the ELP plan area. Whilst it would be unrealistic to expect full cross-referencing in every ELP policy, a number of changes throughout the plan are necessary to address this issue where clarity of interpretation is particularly important. Specifically, the problem is addressed by MM1, which expands the contextual information in the Key Drivers section, and by MM30, which introduces a new Appendix 4, containing a table of cross-references between each ELP policy and the other significant parts of the development plan.

Vision

13. The ELP aims to set out a holistic vision of the creation of new, sustainable, liveable neighbourhoods, with a high standard of housing and design. This is translated into more distinctive visions for each of the estates. However, there is a disconnect between the visions and the suites of policies for each estate, which deal separately with discreet and relatively detailed matters such as townscape, movement and access, land use and environment. The inclusion of numerous maps, diagrams and visualisations of examples of potential future forms of development dilutes the clarity of the visions and complicates the status of various elements of the plan, to the extent that the effectiveness, and therefore soundness, of the ELP is undermined. This is remedied by MM2, which brings together the material expressing the visions, clarifies its status and ensures internal consistency within the plan, in a new over-arching Policy OEP1 Vision. I have made a minor change to the wording of the MM as published for consultation, by adding clearer reference to protection and enhancement of heritage in the vision for Ravensbury.

Strategy

14. There are references in various parts of the document to the policy, economic, social and practical rationale behind the regeneration of the three estates. The context is that, although each estate is physically very different, CHG is the predominant landowner and, to date, developer, driving regeneration in partnership with the council, local communities and others. Although the economic basis for regeneration of the three estates is closely integrated, it is expected that development will proceed in phases and that there will be a need to keep this under review and provide for flexibility during the 10 – 15 year life of the overall programme and the plan. This fundamental underlying rationale and approach is not sufficiently clearly reflected in policy. MM3 addresses this shortcoming by introducing a new Policy OEP 2 Strategy.
15. I have considered whether the quantum, density and mix of housing are sufficiently clear, whilst providing for appropriate flexibility and remaining consistent with the remainder of the development plan. The areas covered by the ELP are small in relation to the Borough but can be considered large sites, presenting opportunities to address regeneration in a variety of ways. The basic aim of the plan is to create high quality neighbourhoods, avoiding, in the council's words, the mistakes of the past. New Policy OEP 2 makes clear that complete regeneration (which in this context means substantial demolition and redevelopment) of Eastfields and High Path estates and partial regeneration of Ravensbury estate is proposed. The overall number of dwellings required to be provided in each estate can and should be determined in accordance with the development plan as a whole, without the need for specific targets, ranges or minima/maxima in the ELP. Policies¹ for each estate, as amended, confirm that the London Plan density framework is to be applied flexibly.
16. Policy OEP 2 explicitly states that affordable housing will be provided on a phase by phase basis, having regard to prevailing need, viability and policy. However, MM8, MM16 and MM24 amend Policies EP E4, EP H4 and EP R4

¹ EP E4, EP H4 and EP R4

respectively, to, among other things, qualify this to make clear that existing numbers of affordable homes will be re-provided. These changes are necessary to provide an appropriate degree of certainty regarding minimum levels of affordable housing and, to the local communities in particular, reassurance on this important matter, whilst continuing to ensure that a review mechanism will address changes in need and viability over time. I have slightly changed the wording of MM16 from the consultation version in order to achieve consistency between the three policies but, in so doing, I have retained the term "affordable homes" as it is more straightforward and consistent with London-wide and national policy and guidance than "habitable rooms or floorspace". For the same reasons, I have also changed MM3 from the consultation version to clarify the wording regarding phasing and review of affordable housing provision.

Urban design

17. Much of the thrust of the ELP, spread among numerous policies for each estate, is concerned with securing good urban design. The submitted plan brings together a number of important urban design principles in the introductory section and a further section, Part 04, towards the back of the document sets out Design Requirements for Planning Applications. This fragmented and overlapping coverage gives rise to potential for contradiction and uncertainty as to what constitutes policy and its relationship with the remainder of the development plan. The effectiveness of the plan is undermined as a result. Together, two MMs are necessary to rectify these shortcomings. MM4 inserts a new over-arching Policy OEP 3 Urban Design. Amongst other things, the policy more clearly ensures that a comprehensive approach to equalities, disability, inclusive design and accessible environments, in accordance with paragraphs 57, 58, 61 and 69 of the NPPF, together with the need to design against crime and for community safety, is given due emphasis. I have added brief references, to better reflect the importance of heritage, to the consultation version of the MM.
18. Furthermore, MM29 clarifies that Part 04 is essentially setting out information required to support planning application submissions, complementing the council's validation checklist and addressing inconsistencies with ELP and other development plan policies. Important clarification is also added regarding the potential impact of development on the Wimbledon Common and Richmond Park Special Areas of Conservation.

Further guidance

19. Throughout the submission ELP, almost all policies are followed by "Further guidance". As written, the effectiveness of the policies is undermined by uncertainty as to whether this further guidance constitutes policy or is part of the Justification of the policies. This problem is addressed within numerous MMs, described under Issue 2 (below), by in most cases recasting the content of the further guidance as part of the policies' Justification.

Plan boundaries

20. The plan boundaries are very tightly drawn around the three estates. However, there are numerous instances throughout the plan where policies seek to require action or compliance concerning locations or issues outwith the plan areas. Such an approach causes uncertainty, not least for applicants and communities, as to which policies apply and creates or risks conflict between the ELP and the remainder of the development plan. Moreover, those with an interest in land or development outside the plan areas may not be fully aware of the ELP's implications. A number of MMs address the problem by deleting the relevant reference or amending it to make clear that it is providing contextual information which may have implications for development within the plan areas.

Overall

21. To conclude, with the relevant MMs as set out above, the plan is sound with respect to its vision, strategy, urban design focus and certain other cross-cutting matters.

Issue 2 – Whether the policies for the three individual estates have been positively prepared, are justified, effective and consistent with national and local policy and guidance?

Townscape - Policies EP E1, EP H1 and EP R1

22. These policies refer to Eastfields, High Path and Ravensbury respectively. In the first and last cases, the policies' effectiveness and consistency is undermined by confusing duplication and lack of clarity within the policy, particularly in the light of the introduction of new Policy OEP 1 Vision. MM5 and MM21 address this shortcoming, together with the further guidance and plan boundary issues referred to in paragraphs 19 and 20 above, which are also addressed by MM13 in the case of policy EP H1. MM21 differs slightly from the consultation version in order to better reflect the importance of Ravensbury's heritage setting.

Street network and Movement and access – Policies EP E2, EP E3, EP H2, EP H3, EP R2 and EP R3

23. Although the subject matter of these policies is closely related, it is not sufficiently clear that the street network policies are concerned essentially with urban form but not vehicular movement and access. Moreover, further issues of clarity and consistency, whilst providing appropriate flexibility, undermine the policies' effectiveness to varying degrees. In the case of EP R2 and EP R3 in particular, concerning the Ravensbury estate, there is insufficient emphasis on the need to deter crime and promote community safety, having regard to Planning Practice Guidance (PPG). There are a number of instances across all six policies where requirements are placed on developers with regard to locations and issues outside the plan boundaries. These problems and the further guidance issue, referred to previously, are remedied by MM6, MM7, MM14, MM15, MM22 and MM23.

Open Space and Landscape – Policies EP E5, EP E7, EP H5, EP H7, EP R5 and EP R7

24. The subject matter of these two sets of policies is also related but, as submitted, their content does not sufficiently clearly distinguish between open space and landscape matters, or provide appropriate degrees of flexibility in all aspects, consistent with the NPPF, PPG and other parts of the development plan. This results in overlap and lack of clarity, particularly with regard to trees and domestic gardens. The three open space policies are not fully consistent with the London Plan and the Mayor's Supplementary Planning Guidance (SPG) for Play and Informal Recreation. Nor do they fully address the implications of development for the provision of indoor and outdoor sports facilities, having regard to Sport England's (SE) Planning for Sport Aims and Objectives. MM9, MM17 and MM25 address these shortcomings by deleting content related to trees and gardens, whilst inserting appropriate references to the London Plan, Mayor's SPG and SE guidance.
25. MM11, MM19 and MM27 amend policies EP E7, EP H7 and EP R7 respectively, to insert content related to trees and gardens, deleted from the policies referred to above. In doing so, with a small change to MM19 from the consultation version, the wording regarding trees is made more concise, so as not to be overly detailed and prescriptive and to be internally consistent and consistent with Policy DM 02 of the SPP. The requirement for appropriate provision of private garden and/or amenity space to all new dwellings (houses and flats), with regard to relevant standards and the character of the development, is consistent with Policy DM D2 of the SPP.

Environmental Protection – Policies EP E6, EP H6 and EP R6

26. These policies cover a variety of matters and suffer from a number of shortcomings. The treatment of flood risk is inconsistent with the evidence base for each estate, the London Plan and national policy and guidance, particularly in the application of sequential and exception tests to development proposals.
27. Furthermore, across the three policies, the coverage of sustainable energy requirements is neither effective nor consistent with the remainder of the development plan or national policy and guidance.
28. Amendment of the policies is also necessary to ensure that the approach to development construction working method statements and construction logistics plans, together with site waste management plans, is appropriate and proportionate to the scale and nature of proposals and anticipated impacts, whilst being consistent with the London Plan and SPP Policy DM D2.
29. In the case of Policy EP H6, amendment is also required to remove references to policy concerning trees which overlap and conflict with other ELP policies to which I have previously referred. All of the above shortcomings are addressed by MM10, MM18 and MM26.

Building heights – Policies EP E8, EP H8 and EP R8

30. Amendment of Policies EP H8 and EP R8 is necessary in order to ensure clarity and remove internal inconsistencies, whilst allowing appropriate flexibility. These shortcomings, together with further guidance and plan boundary issues

across all three policies, are remedied by MM12, MM20 and MM28. I have changed the wording of MM20 from the consultation version in order to better express the general approach to building heights in more sensitive parts of High Path.

Overall

31. In conclusion, with the relevant MMs as set out above, the policies for the three individual estates are sound.

Public Sector Equality Duty

32. In examining the ELP, I have had regard to equality principles in compliance with s.149 of the Equality Act 2010. One tangible outcome of this is MM4, which concerns the new over-arching Policy OEP 3 Urban Design and which is described in more detail in paragraph 17, above.

Assessment of Legal Compliance

33. My examination of the legal compliance of the Plan is summarised below.
34. The ELP has been prepared in accordance with the Council's Local Development Scheme. Consultation on the ELP and the MMs was carried out in compliance with the Council's Statement of Community Involvement. Sustainability Appraisal has been carried out and is adequate.
35. The Habitats Regulations Assessment, December – February 2016 identifies European Sites at Wimbledon Common and Richmond Park as having the potential (due to proximity) to be affected by development within the plan areas. It concludes that the ELP's policies, both in themselves and in combination with other plans, strategies and programmes, will not have an adverse effect on either of these sites, provided that any individual proposals which are likely to have a significant effect are subject to appropriate assessment. This requirement, which is consistent with other parts of the development plan, is specifically addressed by MM29.
36. The ELP, taken as a whole, includes policies designed to secure that the development and use of land in the plan areas contribute to the mitigation of, and adaptation to, climate change. This is particularly evident in Policies EP E6, EP H6 and EP R6, which concern environmental protection, including, among other matters, flood risk, sustainable drainage and sustainable energy. Accordingly, the ELP satisfies this statutory objective.
37. Subject to the recommended MMs, the ELP is in general conformity with the spatial development strategy (The London Plan). Since the close of consultation on the MMs, the Mayor of London has published a draft new London Plan for consultation. As this consultation has only recently begun, this emerging plan has not had a significant bearing on my report.
38. Overall, therefore, subject to the recommended MMs, the ELP complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

39. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
40. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that, with the recommended main modifications set out in the Appendix, the Merton Estates Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Nicholas Taylor

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

APPENDIX - MAIN MODIFICATIONS TO MERTON'S ESTATES LOCAL PLAN

The modifications below are expressed in the conventional form of underlining indicating text which will be added or moved within the final version of the document and ~~striketrough~~ to indicate where original text will be deleted. The page and paragraph numbers relate to the 'submission' version of the plan (document SD.1), including where text is relocated or new paragraphs inserted. Re-numbering of paragraphs has not been undertaken in this version.

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
MM1		Page 20	<p>New paragraph to insert after 2.26]</p> <p><u>[New paragraph] In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:</u></p> <ul style="list-style-type: none"> • <u>The Mayor's London Plan 2016</u> • <u>Merton's Core Planning Strategy 2011</u> • <u>The South London Waste Plan 2012</u> • <u>Sites and Policies Plan 2014</u> • <u>Policies map 2014</u> <p><u>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan. Development proposals must meet the requirements of the whole statutory development plan. Please also refer to Appendix 4 for further details.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
MM2	Part 02: Background (renamed) and new policy added	28 - 38	<p><u>Part 02: Overarching Policies</u></p> <p><u>Policy</u></p> <p><u>OEP 1 Vision</u></p> <p><u>Overarching Plan Vision</u></p> <p><u>Development proposals for Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Mitcham / Morden) must create sustainable, well designed, safe neighbourhoods with good quality new homes that maintain and enhance a healthy local community, improve living standards and create safe environments.</u></p> <p><u>Estates Vision</u></p> <p><u>Having regard to the overarching vision and also the particular characteristics of each estate the vision for each estate is as follows:</u></p> <p><u>A Eastfields – Contemporary Compact Neighbourhood</u></p> <p><u>A new neighbourhood which demonstrates innovative design, reimagining suburban development by maintaining a distinctive character through the creation of a contemporary architectural style encompassing a variety of types, sizes and heights for new homes overlooking traditional streets and the improvement of links to the surrounding area.</u></p> <p><u>B. High Path – New London Vernacular</u></p> <p><u>The creation of a new neighbourhood with traditional streets and improved links to its surroundings, that supports the existing local economy while drawing on the surrounding area’s diverse heritage and strong sense of community. Buildings will be of a high quality internally and externally, have a consistency in design with a strongly urban-form and character, optimising the most efficient use of land that makes the most of the excellent public transport services, and has access to quality amenity space.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>C. Ravensbury – Suburban Parkland Setting</u></p> <p><u>The creation of a new neighbourhood that relates well to the wider parkland and which protects and enhances local heritage, landscape quality and biodiversity. Characterised by buildings arranged as traditional streets and spaces that improve links to the surrounding area, allow for the landscape to penetrate the site whilst simultaneously improving flood mitigation and increasing the number of homes whilst retaining the character of its suburban parkland setting.</u></p> <p><u>Justification</u></p> <p><u>Visions have been produced for the Plan and individual estates. Their aim is to provide a high level guide to the general way in which the council expects to see the estates developed. This is based on the prevailing local context of each estate, the historical analysis and site analysis contained in the appendices as well as an analysis of good practice in urban design, architecture and regeneration.</u></p> <p><u>It is considered important that there is a strong guiding theme for the regeneration of each estate given the long period of regeneration. The long period of building the original High Path estate shows what can happen when there is no high level design guidance and strategy. This has led to completely different styles of planning, design and architecture that have created a fragmented and incoherent environment. It is also important that the visions allow for flexibility of architectural expression and it is expected that differing architectural styles can and should be employed within each estate over the period of regeneration.</u></p> <p><u>Proposals for the estates will be expected to show how they have had regard to the visions and what their interpretation of this means in terms of their proposals. This is most appropriate to show in outline applications for the whole estate. However, this will still need to be shown in the detailed applications that follow.</u></p> <p><u>The diagram on page 29 shows how the visions relate to the planning and wider policy context. The images on pages 32, 34 and 36 show good examples for each estate of recent and planned contemporary development that is considered of high quality and appropriate in form, style and scale for the estates. This is not exhaustive, but should serve as a good guide for applicants and architects. These images demonstrate the scope for variety within each Vision.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>The diagrams on pages 33, 35 and 37 that follow are composites of the individual diagrams accompanying the site specific policies found in Part 03. These constitute the 'Vision Diagram' for each estate. Keys to the content of the diagrams accompany the individual policy diagrams in Part 03.</u></p> <p><u>The images and diagrams referred to above constitute part of the justification for policy OEP 1.</u></p> <p>Page 30,</p> <p>Eastfields: Contemporary Compact Neighbourhood –Inspiration</p> <p>*The above images are exemplar examples of existing and proposed residential developments in the UK which have informed the Council's design aspirations for each estate. <u>These should be used as a guide and inspiration for what the Council expects to see built, in terms of quality, form, style appearance and scale but are not intended to be a definitive template to be slavishly copied.</u></p> <p>Page 32</p> <p>High Path: New London Vernacular – Inspiration</p> <p>*The above images are exemplar examples of existing and proposed residential developments in the UK which have informed the Council's design aspirations for each estate. <u>These should be used as a guide and inspiration for what the Council expects to see built, in terms of quality, form, style appearance and scale but are not intended to be a definitive template to be slavishly copied.</u></p> <p>Page 34</p> <p>Ravensbury: Suburban Parkland Setting – Inspiration</p> <p>*The above images are exemplar examples of existing and proposed residential developments in the UK which have informed the Council's design aspirations for each estate. <u>These should be used as a guide and inspiration for what the Council expects to see built, in terms of quality, form, style appearance and scale but are not intended to be a definitive template to be slavishly copied.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
MM3	Part 02: Background (renamed) and new policy added	<u>28 – 38</u>	<p><u>Policy</u></p> <p><u>OEP 2 Strategy</u></p> <p><u>Over a 10-15 year period, the creation of sustainable well designed safe neighbourhoods with good quality new homes for Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Mitcham / Morden) will be achieved by ensuring that development proposals:</u></p> <p><u>a) Are in compliance with the Statutory Development Plan, of which the Estates Local Plan forms a part;</u></p> <p><u>b) Are consistent with a single linked regeneration programme for Eastfields, High Path and Ravensbury;</u></p> <p><u>c) For Eastfields and High Path, set out regeneration of the whole estate and partial regeneration of the Ravensbury estate;</u></p> <p><u>d) Will be expected to include phasing plans indicating the proposed timing of major building phases</u></p> <p><u>e) Provide affordable housing on a phase by phase basis, having regard to prevailing need, viability and national and local policy and guidance.</u></p> <p><u>Planning obligations (also known as Section 106 agreements) and Community Infrastructure Levy (CIL) will be used by the council to mitigate the impact of development and to ensure the delivery of key infrastructure.</u></p> <p><u>Justification</u></p> <p><u>The Estates Local Plan is part of the Statutory Development Plan which consists of the London Plan, Merton’s Core Planning Strategy, Merton’s Sites and Policies Plan, Merton’s Sites and Policies Map and the South London Waste Plan. Collectively these documents help to deliver Merton’s planning objectives which are:</u></p> <ul style="list-style-type: none"> <u>To make Merton a municipal leader in improving the environment, taking the lead in tackling climate</u>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.</u></p> <ul style="list-style-type: none"> • <u>To promote social cohesion and tackle deprivation by reducing inequalities.</u> • <u>To provide new homes and infrastructure within Merton’s town centres and residential areas through physical regeneration and the effective use of space.</u> • <u>To make Merton more prosperous with strong and diverse long-term economic growth.</u> • <u>To make Merton a healthier and better place for people to live, work in or visit.</u> • <u>To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green space.</u> • <u>To make Merton a well connected place where walking cycling and public transport are the modes of choice when planning all journeys.</u> • <u>To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough.</u> <p>[Paragraph 2.21 relocated]</p> <p><u>2.21 The Estates Local Plan primarily guides how new homes will be delivered via a coordinated strategy considering the social economic and environmental opportunities an impact of growth and provides the framework for sustainable development of these areas. The regeneration of all three estates as part of a single comprehensive programme has been presented to the council as the basis of being able to viably deliver regeneration and it is on this basis that the council is considering the deliverability of the Estates Local Plan.</u></p> <p><u>The proposed regeneration of the whole of High Path and Eastfields estate and the partial regeneration of Ravensbury Estate is based on a suite of evidence provided by Clarion Housing group which included:</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<ul style="list-style-type: none"> • <u>The Case for Regeneration</u> • <u>Housing Needs Study</u> • <u>Socio-economic analysis</u> • <u>Stock Condition Analysis</u> • <u>Urban Design studies</u> • <u>Visual Impact studies</u> <p><u>A key expectation of any regeneration proposal that comes forward will be a commitment to keeping the existing community together in each neighbourhood and for existing residents to have a guaranteed right to return to a new home in their regeneration neighbourhood.</u></p> <p><u>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 within each phase of development, together with a mechanism, such as a Section 106 agreement, to ensure that viability is kept under review, will be determined in the light of the development plan and any other national, London-wide and local policy and guidance.</u></p> <p><u>The SA/SEA has identified phasing and implementation as critical elements in minimising the disruption to existing residents as far as possible.</u></p>
MM4	Part 02: Background (renamed) and new policy added	28 - 38	<p><u>Policy</u></p> <p><u>OEP3 - Urban Design</u></p> <p><u>a) Development proposals will be expected to adhere to all of the principles listed below to ensure that they achieve the highest standards of urban design, accessibility and inclusive design:</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>(i) Perimeter blocks:</u> Buildings should be arranged so that the fronts face outwards, towards the street;</p> <p><u>(ii) Active frontages:</u> Building entrances and windows onto the street should be maximised;</p> <p><u>(iii) Building lines:</u> Boundaries should clearly define the fronts of buildings, create spaces and define routes</p> <p><u>(iv) Landscaping:</u> High quality usable public and communal space and landscaping should be provided and opportunities taken to provide effective management of flood risk from all sources whilst ensuring no increase in flood risk elsewhere;</p> <p><u>(v) Defensible space:</u> The transition from public to private space should be understandable and clearly defined;</p> <p><u>(vi) Community safety</u> Provide well-defined routes, spaces and entrances that promote convenient and safe movement in accordance with the principles of good urban design and Secured by Design;</p> <p><u>(vii) Promoting biodiversity:</u> Promoting the variety of plants, animals and other living things found in an area;</p> <p><u>(viii) Inclusive and active design:</u> Development proposals should encompass the needs of everyone and provide opportunities for healthy and active lifestyle choices and facilitate access by people with a range of disabilities</p> <p><u>(ix) Promoting sustainable development:</u> Promoting sustainable development: that maximises its environmental performance across a range of sustainability criteria to adapt to the effects of climate change over the lifetime of development;</p> <p><u>(x) Density:</u> Using high quality design to determine an appropriate density for an area;</p> <p><u>(xi) Permeable, legible and accessible layouts:</u> Arrangement of streets and buildings that offer a convenient choice of routes that are easy to understand.</p> <p><u>(xii) Parking provision:</u> Vehicular parking that is provided on-street as a first choice, well managed and</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>integrated into the rest of the street;</u></p> <p><u>(xiii) Local context (heritage, buildings, materials, interpretation, art):</u> <u>Using the local context, including heritage and good quality design, to inform the design and appearance of new development.</u></p> <p><u>b)</u> <u>Design Review must be embedded into the development process for the regeneration of the estates. Masterplans and proposals for all phases of development on each estate must be reviewed at least once by the Council's Design Review Panel.</u></p> <p><u>Justification</u></p> <p><u>This policy outlines a set of broad design principles. Applications must demonstrate adherence to these principles in order to be in accordance with, in particular, paras. 57, 58, 61 and 69 of the NPPF, Policy 7.2 of the London Plan and Policy DM D1 of the Merton Sites and Policies Plan. As such, all development proposals will be expected to adhere to these principles in order to achieve the highest standards of urban design, accessibility and inclusive design.</u></p> <p><u>The Equality Act 2010 describes a disability as a physical or mental impairment which has a substantial and long-term adverse effect on one's ability to carry out normal day-to-day activities. All development proposals will be expected to have consideration for people with disabilities as defined by the Equality Act. This includes physical and mental conditions – for example, dementia. Full definitions of the terms used for the principles can be found in the Glossary.</u></p> <p><u>Perimeter blocks</u></p> <p><u>New development will be expected to be built using the principle of perimeter blocks. This is where the public entrances to buildings face the streets and the more private elements are less visible and accessible to the rear. Perimeter blocks are a flexible approach to development and need not create a uniform layout. This approach creates a strong and easy to understand layout. Importantly, it also creates a clear arrangement of public and private space that builds in natural surveillance and security.</u></p> <p><u>Active frontages</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>New development must be designed to have buildings with entrances and windows facing the street (active frontages) and should avoid blank walls or gable ends. This provides long term flexibility of buildings, creating activity and vibrancy in commercial areas and supporting a level of activity on quieter streets to create a good level of natural surveillance to deter criminal activity. This is particularly relevant to ground floor frontages, where maximising windows and doors is particularly important. In commercial frontages, views into shops and businesses, whether open or closed is also important.</u></p> <p><u>Building lines</u></p> <p><u>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 undermine this and should therefore be avoided.</u></p> <p><u>Landscaping</u></p> <p><u>All private, communal and public amenity space must be of a high quality of design, attractive, usable, fit for purpose and meet all policy requirements, including addressing issues of appropriate facilities, replacement space or identified shortfall. High quality designed amenity space will have good levels of privacy or public surveillance depending on their purpose and generally have an open aspect, good sun/ daylighting, be of a single regular shape and have easy and convenient access for all potential users. Landscaping also provides opportunities for sustainable urban drainage and other initiatives to address flood risk from all sources (fluvial, surface water and groundwater) and opportunities should be taken to provide effective management of flood risk from all sources whilst ensuring no increase in flood risk elsewhere;</u></p> <p><u>Defensible space</u></p> <p><u>Defensible space is the area or feature that separates the street and the buildings accessed from it. This space functions as a clearly understandable transition, or buffer zone, from public street to the private building, ensuring a good level of natural surveillance between street and building, as well as a degree of privacy. It is important in creating successful perimeter blocks and buildings with entrances and windows facing the street (active frontages) and no blank walls or gable ends. New development will be required to ensure all buildings fronting onto streets have successfully designed defensible space that is appropriate to</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>the uses in the buildings.</u></p> <p><u>Promoting biodiversity</u></p> <p><u>Development proposals should incorporate and promote biodiversity, through open space, street trees, green chains, SuDs and a variety of other means, including those more directly related to mitigating the effects of climate change. Biodiversity also adds visual attractiveness and local distinctiveness, and can also provide recreational facilities.</u></p> <p><u>Community safety</u></p> <p><u>Community safety considerations are an integral part of good urban design. The way buildings and spaces are designed and arranged affects how residents and the wider community perceive and navigate the urban environment. Secured by Design principles should be used to enhance community safety and help design out crime. Clear and well-defined routes, spaces and entrances should be provided; poorly defined space, poor sight lines and a lack of natural surveillance should be avoided. This allows for convenient movement without compromising security. Community safety considerations must be included at the earliest design stages to help prevent the need for costly, unsightly and less effective retrofitting of the development post construction. Design and Access Statements will be required at both outline and detailed planning stages which show how crime prevention measures have been considered as an integral part of the design of the proposal.</u></p> <p><u>Promoting inclusive and active design</u></p> <p><u>The design of new development and streets must promote Inclusive and Active Design. This approach will ensure that the development includes local facilities that are easily accessible and create good quality, well maintained and safe places with convenient and direct routes throughout the development. Development proposals should demonstrate how the principles in the GLA's Accessible London: Achieving an Inclusive Environment SPG has been incorporated into the development proposals. The public realm should be designed to facilitate low vehicle speeds and reduced vehicle dominance. Active Design provides opportunities for everyone to be naturally active as part of their daily life, and so improves health and wellbeing.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>Promoting sustainable development</u></p> <p><u>New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy. Such principles can include use of energy efficient building materials, appropriate design and construction methods and use of low-carbon technologies and renewable energy generation. New development should be sustainable in terms of supporting local social and economic development to support community development, for example by making use of sustainable travel modes the first choice, encouraging community based car sharing schemes and facilitating improved health and wellbeing, such as enabling local food growing in accordance with the Merton Food Charter.</u></p> <p><u>Permeable, legible and accessible layouts</u></p> <p><u>New development should connect easily with surrounding neighbourhoods and not be seen as a separate place or result in restricted access. New neighbourhoods must be easy and convenient to get around, and be accessible for all users. Streets must be safe and look like they lead somewhere, be clearly and visibly connected to other streets. Well connected street layouts should encourage walking and cycling as well as allowing for convenient and clear vehicular access.</u></p> <p><u>Density</u></p> <p><u>The London Plan Density Matrix should be used flexibly with other relevant criteria to determine an appropriate density for each estate that ensures high quality design. Development that is too dense or poorly designed may result in cramped internal layouts, overlooking or daylight issues, or a high number of single (or nearly single) aspect dwellings. Development that is not dense enough will not use land efficiently and effectively or provide sufficient good quality homes.</u></p> <p><u>Parking provision</u></p> <p><u>On street provision is the preferred option for vehicle parking. It is essential that on-street vehicle and cycle parking is well-designed, well managed and integrated into the rest of the street. On-street parking creates activity, vitality and ensures a good level of natural surveillance. Only when on-street provision cannot accommodate all parking needs should other methods of parking be used. All methods of parking provision should be of a high quality design that is attractive, convenient and safe for people, bikes and vehicles. The</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>council applies the parking standards set out in the Mayor’s London Plan and reference should also be made to the London Housing SPG and subsequent updates.</u></p> <p><u>Local context (heritage, buildings, materials, interpretation, art)</u></p> <p><u>The design, layout and appearance of new development should take inspiration and ideas from the positive elements of the local built, natural and historic context. Development proposals should include an analysis of what local characteristics are relevant and why, and which are less so. Opportunity must be taken to strengthen local character by drawing on its positive characteristics.</u></p> <p><u>Design Review</u></p> <p><u>Design Review is a well-established method of improving the quality of design in the built environment. It is recognised in the National Planning Policy Framework (NPPF) (para.62, page 15). Design Review is an independent and impartial evaluation process in which a panel of experts on the built environment assess the design of a proposal. Proposals relating to the whole or phases of the three estates must be reviewed at least once, ideally at pre-application stage, by Merton Council’s Design Review Panel www.merton.gov.uk/designreviewpanel Depending on the significance of the proposal, applicants may want to consider other design reviews such as Urban Design London or the Mayor of London to help guide and improve their schemes.</u></p>
MM5	EP E1 Townscap e and associated diagrams	Page 62	<p>a) <u>Proposals should demonstrate a well-defined building line fronting the combined East-West street. Buildings should address the street, providing continuity and enclosure along the route, but broken at intervals by streets into the estate, so as not to appear as a fortress-like wall between the street and the estate beyond.</u></p> <p>b) This frontage should not present a fortress-like wall between the street and the estate beyond. Therefore this frontage should be broken at intervals by streets into the estate.</p> <p>e) b) Proposals should create a <u>principal</u> focal point in the estate. The most suitable location for this is at the intersection of the north-south and east-west streets.</p> <p>d) c) The massing and layout of proposals should enable visual connectivity from within the estate to the</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>attractive surroundings of the playground and cemetery.</p> <p><u>Further guidance Justification</u></p> <p>[Paragraphs 3.37 and 3.38 relocated]</p> <p>3.39 Townscape features should be used as a design framework in which to deliver the vision for Eastfields, of a Contemporary Compact Neighbourhood. Within this framework proposals should demonstrate innovative design and architecture to re-imagine suburban development close to both green spaces and with good access to public transport. Proposals will be expected to respond well to, and integrate well with, green and open spaces and a suburban setting. How to increase the number and quality of new homes whilst responding positively to this overall character will be a key requirement against which design quality is assessed.</p> <p>3.40 The existing estate is very uniform and fortress-like in its appearance. It is visually distinct from the surrounding housing but other than this, the uniformity of the buildings makes it difficult to understand and navigate around the estate. The internal open space is completely hidden from the outside. The continuous frontage of the estate and the prominent garage doors present a forbidding and unwelcoming visual prospect. This and the recessed front doors present a visually hostile frontage to the streets. Combined with the large areas of parking these elements break down any sense of there being streets at all, merely spaces that are used to access houses and park cars in.</p> <p>3.41 Redevelopment should enable the creation of a neighbourhood that is easier to get around and understand; is open, inviting and visually attractive, without necessarily encouraging large numbers of people simply to wander around. A strong active frontage will help the neighbourhood to become more outward looking and better integrated into the wider area. Streets which intersect with the frontage will enable the creation of a well-connected neighbourhood.</p> <p>3.42 A suitably located <u>principal</u> focal point will aid the integration of the neighbourhood in its location reducing the insularity of the estate whilst proving a key orientation focus which will help people in getting around the neighbourhood. A <u>principal</u> focal point at the intersection enables future development potential to the north of the estate to be brought forward in an integrated manner. Landmarks are useful in providing reference points for orientation and emphasize the street hierarchy. <u>Other focal points may be provided where</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>they achieve the aims set out in this policy.</u></p> <p>3.37 <u>Landmark buildings should be located around the focal point at the intersection of the north-south and east-west streets.</u></p> <p>3.38 <u>Landmark buildings could be differentiated by appearance and to a degree by height; however they should be designed to ensure that they are sensitive to the general character of the rest of the development.</u></p> <p>3.43 Views through to open areas, such as the playground and cemetery, will better integrate the estate into the wider context.</p>
MM6	EP E2 Street network	Page 64	<p><u>Further guidance Justification</u></p> <p>[Paragraphs 3.44 and 3.45 relocated]</p> <p>3.46 This policy section is about the creation of clearly defined and understood streets. It does not define vehicular movement. This is addressed by policy EP E3.</p> <p>3.47 The new street network should make the estate feel more open and connected to the surroundings. It will also improve integration of the new street network with the surrounding streets. However, it is acknowledged that the surrounding road network and location of open space limits the degree to which this can be done.</p> <p>3.48 The existing street network is a fragmented mix of streets created at different times. This is a major factor in making the estate feel fortress-like and impenetrable as well as difficult to navigate around the network of streets.</p> <p>3.44 <u>Within the estate, there should be a clear, and easy to navigate network of streets, to enable free movement around, into and out of the estate. These should be a mix of traditional streets and mews type</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>streets.</u></p> <p>3.45 <u>The new east-west street should have the character of a traditional street, with carriageway flanked by footways either side. As it passes to the north of the estate, it should not be designed to feel as part of the estate, rather just as another local street.</u></p> <p>3.49 Combining the three streets of Acacia Road, Mulholland Close and Clay Avenue to form a new street will aid navigation and ensure visibility of the route between the residential areas either side of the estate.</p> <p>3.50 Converting the existing footpath running south from Grove Road to Acacia Road to a new street will create improved links to the existing street network in this area. It will improve pedestrian and cycle links between the estate and across the existing railway footbridge to the north and provide clear visual links to the surrounding greenspace.</p>
MM7	EP E3 Movement and Access Page 66	Page 66	<p>a) Vehicular access arrangements should not divide the estate into two, <u>as is the current arrangement.</u> Proposals for the estate must investigate the feasibility of Acacia Road, Mulholland Avenue and Clay Avenue being combined into a single street with full vehicular access at both ends.</p> <p>b) Pedestrian and cycle access from the north should be improved by <u>Proposals should make provision for upgrading the existing footway / access running south from Grove Road towards Mulholland Close so as to improve pedestrian and cycle access from the north.</u> Proposals should explore the potential to widen this link into a proper street with carriageway and footways either side should also be explored.</p> <p>c) Internal north-south streets should penetrate to the site boundary with the cemetery in a number of places on the southern boundary.</p> <p><u>Further guidance Justification</u></p> <p>[Paragraphs 3.51 amended and relocated. Paragraphs 3.53 and 3.56 amended]</p> <p>3.52 This policy section is about establishing the main vehicular movement strategy. This is different from the creation of streets, which may or may not support through vehicular movement. Proposals for vehicular</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>movement must be supported by appropriate traffic modelling and be in general compliance with relevant transport policies, whilst also aiming to achieve good vehicular permeability and convenience for residents.</p> <p>3.53 Vehicular and cycle parking on the estate will be provided in accordance with the London Plan (2016) parking standards taking into account specific local conditions and requirements. This should be supported by a Parking Management Strategy.</p> <p>3.54 The Eastfields estate sits on the outskirts of Mitcham and is considered to be relatively isolated from the surrounding neighbourhood. Situated away from the main road network the most important traffic routes are Grove Road and Tamworth Lane, which are designated local distributor roads</p> <p>3.55 Mitcham Eastfields Railway Station is located about 5 to 10 minutes' walk away and provides links to Central London and Sutton. Access by bus is provided by the route 152 and 463 services. The nearest sizable retail and service offer is at Mitcham town centre, which is located about 1km to the west. The Laburnum Road Home Zone and St Marks Road provides a convenient walking and cycling route to the centre.</p> <p>3.56 <u>For vehicular movement, the estate essentially operates as two large cul-de sacs, accessed from either the east or west due to Mulholland Close and Clay Avenue both being blocked as through roads. Vehicles on one side of the estate are required to travel via Grove Road in order to get from one side of the estate to the other and the residential area beyond. In order for vehicles to get from a property on one side of the estate to the other, they are required to make a long and inconvenient journey via Tamworth Lane, Grove Road and Woodstock Way, joining the queuing traffic at the level crossing. Proposals must investigate the feasibility of opening up Clay Avenue, Mulholland Avenue and Acacia Road to full vehicular access, using urban design and traffic calming measures to deter speeding or rat running. This is inconvenient, inefficient and adds to congestion on this already busy road and the level crossing.</u></p> <p>3.57 Pedestrian/cycle access exists east-west across the north side of the estate, but the route is far from obvious, being made from three different roads all on slightly different positions and with a visual 'block' of tree planting and scrub vegetation in the middle. Pedestrian/cycle access also exists from the north via a footpath from Grove Road. However, this is narrow and poorly overlooked and curves away from the estate at its south end. The estate layout prevents any access across it, or views to the cemetery to the south, where</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>there are also no links into it.</p> <p>3.58 Despite the naturally isolated location, there are possibilities for improving movement and access, better linking the area to the surroundings. In particular, combining Acacia Road, Mulholland Avenue and Clay Avenue into a single street with full vehicular access at both ends should help to address the localised congestion at the level crossing, aid navigation and ease of movement around the area and estate generally. It is not intended to propose any through routes through the estate itself.</p> <p>3.51 Consideration should be given to allowing through traffic on the east-west combined Acacia Road, Mulholland Avenue and Clay Avenue street <u>In order to improve bus reliability and accessibility for the estate, proposals should investigate the potential implications of routing one or more bus services away from the level crossing and along this street, based on appropriate impact assessment and consultation.</u></p> <p>3.59 Improvements to pedestrian and cycle access from the north could create a clear, open and well surveyed street to link up with the railway footbridge to the north and into the estate and cemetery to the south.</p>
MM8	EP E4 Land use	68	<p>a) The land use for the estate will remain predominantly residential with open space <u>associated landscaping</u> provision and <u>with provision of no fewer than the existing number of affordable homes</u>, non-residential uses and designated open space to meet relevant planning policies.</p> <p>b) Densities should not be solely focused around figures, but must be assessed as a product of a range of relevant design, planning, social, environmental and management factors. Exceeding the current indicated <u>London Plan</u> density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.</p> <p><u>Further guidance Justification</u></p> <p>[Paragraph 3.60 relocated and paragraph 3.62 amended]</p> <p>3.61 Eastfields is located in an area with a low Public Transport Accessibility Level and a suburban character.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>3.62 Development proposals should accord with the London Plan density matrix and any other emerging or updated relevant policy requirements. <u>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.</u> As outlined in the London Plan, the density matrix should be used flexibly and in conjunction with other development plan policy requirements.</p> <p>3.63 Proposals should also consider transport capacity, employment connectivity, the location and characteristics of the site and social infrastructure when determining an appropriate density. Development proposals should contribute to the delivery of a sustainable neighbourhood by building more and better quality homes and demonstrate how the density responds to the local context particularly in terms of design. Proposals should demonstrate graphically how density is sympathetic to the surrounding townscape and distributed in appropriate locations in a mix of buildings to deliver a variety of well-designed new homes and public spaces.</p> <p>3.64 Development proposals will be expected to contribute to optimising the latest borough and London housing supply requirements in order to meet local and strategic need. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents’ individual needs.</p> <p>3.65 In accordance with Sites and Policies Local Plan Policy DM E4 (Local Employment Opportunities) major development proposals will be expected to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. Merton’s Local Plan identifies a local deficiency in convenience retail provision to the east side of the estate. Any proposals for retail provision will need to accord with Merton’s Local Plan policies including CS7 (Centres) and DM R2 (Development of town centre type uses outside town centres).</p> <p>3.60 Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>such as business space or local retail facilities, these should be located at the principal focal point where the north-south and east-west streets intersect (see map on following page). This will make them most easily accessible to everyone, including those outside the estate, and support local legibility and orientation.</u></p>
MM9	EP E5 Open Space	Page 70	<p>a) There must be equivalent or better re-provision of the area of designated open space at the boundary with the cemetery in terms of quantity and quality to a suitable location within the estate, with high quality landscaping and recreational uses. <u>Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with the London Plan policy 7.18 'Protecting Open Space and addressing Deficiency'.</u></p> <p>b) Suitably designed play space(s) for all age groups must to be provided in accordance with <u>have regard to</u> the Mayor of London's 'Play and Informal Recreation' supplementary planning guidance document (2012).</p> <p>c) <u>Development proposals must be supported by an analysis of the current and future need for the provision of indoor and outdoor sports facilities in order to support the population arising from the proposals. Any proposals should have regard to Sport England's Planning for Sport Aims and Objectives to protect or relocate existing facilities, enhance the quality, accessibility and management of existing facilities and provide new facilities to meet demand.</u></p> <p>c) As there are groups of large mature trees in the existing main open space, any new open space must incorporate these trees into it as key landscape feature.</p> <p>d) All new houses must have gardens that meet or exceed current space standards.</p> <p>Further guidance <u>Justification</u></p> <p>[Paragraphs 3.66, 3.69 and 3.72 amended. Paragraph 3.70 and 3.74 deleted]</p> <p>3.66 The number of open spaces and their individual size is not prescribed. Open space can be provided in the form of a single space or a number of smaller spaces. However one of the key positive characteristics of the existing estate is the large central space, and it is anticipated there should be at least one large public open space in the new development <u>Designated open space re-provided on site as required under Policy EP</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>E5 (Open Space) (a) is anticipated to be re-provided as one large open space. It could also be provided as a series of connected, smaller open spaces.</u></p> <p>3.67 The open space reconfiguration and landscape connectivity opportunities should be tied in with the requirements for Sustainable Drainage Systems (SuDS) and a reduced rate of surface run-off and storage, and the conveyance of surface water run-off.</p> <p>3.68 The streets meeting the southern boundary with the cemetery could be in the form of pocket parks that can be utilised for a range of uses including allotments and food growing.</p> <p>3.69 The estate is within easy access to a variety of parks and play facilities including Long Bolstead Recreation Ground, a BMX track and the Acacia Centre with its adventure play area. It is not in an area deficient in access to public open space. However- Following a review in 2015 of the public open spaces surrounding the Eastfield's Local Plan sites, updated Greenspace Information for Greater London (GiGL) calculations show that a relatively small area (0.2 hectares) at the south western corner of the site is deficient in access to Local Open Spaces (see map in appendix 2 of this document). The Street Network (EP.E2) and Movement and Access (EP. E3) policies will however ensure that the site will be more permeable and will create shorter routes for residents to nearby parks and open spaces and will therefore address this matter. <u>Any proposed development of the site should consider addressing this deficiency through the design of street and routes through the site in accordance with Policies EP E2 (The Street Network) and EP E3 (Movement and Access). There is potential to alleviate this deficiency by creating shorter routes to nearby parks and open spaces with the use of these policies.</u></p> <p>3.70 Subject to meeting appropriate minimum standards concerning the provision of outdoor amenity space and play space, there is not requirement to provide additional public open space within the development.</p> <p>3.74 The relatively narrow strip of designated open space adjacent to the cemetery is of poor quality. The regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality and in a more suitable location.</p> <p>3.72 Where the provision of a large public open space is justified, the design of the space should be flexible enough in terms of scale, layout and design so that it can play host to a variety of activities such as food growing, playgrounds, sports courts, informal and flexible space which can support occasional use for a broad</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>range of community events. Development proposals must be in accordance with <u>have regard to</u> para.74 of the NPPF and Sport England’s Land Use Policy Statement ‘Planning for Sport Aims and Objectives’.</p> <p>[New paragraph] <u>Development proposals should demonstrate the impact that they will have on the use of existing indoor and outdoor local sports facilities. The scope and methodology of the research will be prescribed by Sport England and the local planning authority, during pre-application discussions. Any identified shortfall should be mitigated where appropriate through either a condition attached to a planning decision, a section 106 agreement or the Community Infrastructure Levy (CIL) as identified at the planning decision making stage. In accordance with the NPPF and the London Plan, Merton Council is committed to delivering a new playing pitch study in support of the planned borough-wide Local Plan.</u></p> <p>3.73 There are potential opportunities for off-site play space enhancements that might address the need for certain age groups while there will also be a need for some on-site play space. Any proposal should clearly demonstrate how the play space needs of all age groups will be provided for with reference to the guidance in the Mayor of London’s ‘Play and Informal Recreation’ supplementary planning guidance document (2012).</p> <p>3.74 The provision of gardens that meet space standards increases their functionality, potential for tree planting and the promotion of biodiversity. Front gardens or defensible space that allows for some planting, is also encouraged.</p>
MM10	EP E6 Environmental Protection	72	<p>a) <u>In accordance with the London Plan policies 5.12 Flood Risk Management and 5.13 Sustainable Drainage and the supporting Design and Construction Supplementary Planning Guidance (SPG April 2014), the proposed development must aim to reduce post-development runoff rates as close to greenfield rates as reasonably possible practicable.</u></p> <p>b) Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan Policy <u>5.13 Sustainable Drainage</u> hierarchy as possible.</p> <p>c) Sustainable Drainage Systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following <u>multi-functional</u> benefits:</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<ul style="list-style-type: none"> • Blends in and enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>d) The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development <u>taking the latest climate change allowances into account</u>. Potential overland <u>surface water</u> flow paths should be determined and appropriate solutions proposed to minimise the impact of the development, for example by configuring road and building layouts to preserve existing <u>surface water</u> flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p> <p>e) Proposals should seek to link existing and proposed open space in a unified landscape layout; this should include minor green corridors that will encourage species to move from the cemetery into or through the development</p> <p>f) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayors Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.</p> <p>g) e) When preparing development proposals in accordance with Policy 5.3: <u>Sustainable design and construction</u> of the London Plan, proposals should include suitable comparisons between existing and proposed developments <u>at each stage of the energy hierarchy</u> in order to fully demonstrate the expected improvements. All new developments proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure and sustainable procurement of materials.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>h) Technological improvements in battery storage have started to provide a potential energy storage solution suitable for use in connection to domestic solar PV systems. The use of on-site storage offers a potential technological solution that would increase on-site renewable energy consumption, reduce utility costs and provide in-situ demand-side management. Battery storage can therefore be considered to sit within the 'be lean' or middle level of the energy hierarchy. Domestic PV installations should therefore not be considered without exploring the potential for on-site energy storage. Carbon savings from the incorporation of appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero.</p> <p>f) <u>All domestic solar PV installations should be considered in conjunction with on-site battery storage.</u></p> <p>h) g) Applicants must demonstrate how their plans contribute to improving air quality and provide evidence to demonstrate that passive ventilation strategies employed to prevent overheating will not inadvertently expose residents to poor air quality or unacceptable levels of external noise.</p> <p>h) h) New development must ensure the preservation, protection and enhancement of protected species and habitats within the site and on adjacent land such as Streatham Park Cemetery, and should demonstrate that the proposals would result in net biodiversity gains</p> <p>k) i) <u>Development proposals must be accompanied by a working method statement and construction logistics plan framework that are appropriate and proportionate to the scale and nature of the proposal, whether outline or detailed, the sensitivity of the context and the types and severity of the anticipated impacts.</u></p> <p>h) j) <u>Development proposals should demonstrate, by means of the submission of a site waste management plan, how they will apply the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location using the most appropriate means.</u></p> <p><u>Further guidance-Justification</u></p> <p>[Paragraphs 3.77, 3.84, 3.86, 3.87 and 3.88 amended]</p> <p>3.75 As set out in earlier policies on townscape, movement and access, the creation and layout of a more traditional street network for Eastfields will allow links through and views to the spaces within and beyond the</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>estate, such as between the school playing fields and the cemetery. Regeneration should take the opportunity to retain the existing mature trees where possible and use landscaping and vegetation along the new streets and paths to better link the surrounding green spaces, create an attractive environment and aid biodiversity.</p> <p>3.76 The land is relatively flat, however a culverted ditch (adopted by Thames Water as a surface water sewer) passes between the estate and Long Bolstead Recreation Ground. Deculverting could provide opportunities to create distinctive landscaping and improved biodiversity, as well as managing surface water flooding that occurs here – a legacy from a long silted up pond. Any deculverting of this asset will require Thames Water approval. A linear SuDS feature may also provide significant benefits, i.e. if it is not possible to deculvert the sewer.</p> <p>3.77 Eastfields is not modelled as at risk of fluvial flooding but is at risk of surface water flooding. As already set out in national policy, the London Plan and Merton’s adopted development plan, development proposals will need to include appropriate flood mitigation measures to ensure the development is safe and does not increase the risk of flooding both from the development to the surrounding area and vice versa. Any development coming forward will be subject to a Sequential Test, Exception Test and must provide a site specific Flood Risk Assessment to deal with all sources of flooding, which must have regard to Merton’s Strategic Flood Risk Assessment and Local Flood Risk Management Strategy. Eastfields is not shown to be subject to river flooding, but is shown to be at risk of surface water flooding. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk and following the sequential approach. This includes careful consideration of where buildings should be located within the site.</p> <p>3.78 As surface water flood risk and drainage have been identified as a key issue for Eastfields, development proposals must demonstrate they have achieved greenfield run-off rates as reasonably possible, using Sustainable Drainage Systems (SuDS) and considering surface water management as high up the London Plan (policy 5.13) drainage hierarchy as reasonably possible.</p> <p>3.79 SuDS can include a wide range of measures such as rain gardens, green roofs, balancing ponds, filter strips, green verges and swales. It is important that development proposals demonstrate how SuDS measures are not only considered as drainage solutions but as features to improve the townscape, amenity and public realm of the new Eastfields estate, to enhance biodiversity, to provide recreation and to improve</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>water quality and efficiency.</p> <p>3.80 Developers are advised that guidance tools, such as the SuDS management train approach will assist with this process and with demonstrating that all of these positive attributes have been considered together. This approach will help create an attractive estate with the overall benefit of cost efficiencies.</p> <p>3.84 The Mayor of London’s Sustainable Drainage Action Plan (draft) and Sustainable Design and Construction supplementary planning guidance and the government’s National Standards for Sustainable Drainage set out the requirements for the design, construction operation and maintenance of SuDS.</p> <p>3.82 Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes. However, the measurement of local sustainability policies (CS15) and regional policy targets (London Plan Chapter 5) for new build developments are based on improvement that are also measured through Part L of the Building Regulations. While this information is useful to help measure performance, it does not make it easy to compare the energy performance of existing buildings with new buildings.</p> <p>3.83 Energy performance data on existing buildings will be held for many sites in the form of Energy Performance Certificates which measures the predicted energy consumption per m2 in a development. By providing the energy performance data from Energy Performance Certificates, building energy performance can be compared between existing and future development using a metric that is suitable and easily comparable, thus helping to clearly demonstrate the potential for environmental improvements</p> <p>3.84 The principals <u>principles</u> of sustainable design and construction are designed to be holistic and are more wide ranging than energy performance alone. Development proposals should demonstrate wherever possible <u>environmental improvements</u> using the comparison of quantifiable measures, where possible, and qualitative appraisals, where appropriate. In this way the environmental improvements that will be delivered through regeneration should <u>can be easily</u> compared with the performance of existing buildings in an easily compared manner.</p> <p>3.85 Passive ventilation strategies cannot be considered in isolation of potentially negative external environmental factors such as air quality or noise. Energy strategies that rely on passive ventilation should clearly demonstrate that occupants will not be adversely affected by air and noise pollution during periods of</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>warmer weather.</p> <p>[Paragraph split to improve ease of reading]</p> <p>3.86 Technological improvements in the field of energy storage have resulted in the improved feasibility of deploying battery storage in connection with domestic solar PV systems. and the <u>The need to develop polices to support Innovative Energy Technologies innovative approaches</u> is outlined in London Plan Policy 5.8: <u>Innovative energy technologies</u>. Battery storage can be utilised as a method of increasing on-site renewable energy consumption, <u>providing and provide</u> in-situ energy demand management to reduce pressure on the national grid during peak time, and increasing the efficiency of energy supply. In this way battery storage can be considered to be a 'be clean' measure within the Mayor's <u>energy hierarchy- outlined in London Plan policy 5.2: Minimising carbon dioxide emissions</u>. <u>The Standard Assessment Procedure (SAP) standard approach from for calculating the energy output from solar PV assumes a 20% reduction in PV output from distribution losses that 20% of the energy produced is lost through transmission across the national electricity grid. Therefore, at present, there is no method of capturing these benefits of on-site energy storage within the Standard Assessment Procedure (SAP) or recognising the benefits of energy storage through the planning process. In order to recognise the benefits of on-site energy storage to residents and the grid operator the incorporation of appropriately sized solar PV systems should calculate solar output using the following equation, assuming the distribution losses are zero. Energy strategies that utilise appropriately sized solar photovoltaics in tandem with on-site battery storage may account for the associated carbon benefits by recouping the 20% of solar photovoltaic output traditionally discounted under SAP as 'distribution loss'. This additional carbon saving may be calculated using the below equation and then discounted from any carbon emissions shortfall for the wider development as a whole.</u></p> $\frac{\text{(kWh/year)}}{\text{(Carbon savings from battery storage)}} = \frac{\text{kWp} \times \text{S} \times \text{ZPV} \times 0.2}{\text{Output of System (kWh/year) = kWp} \times \text{S} \times \text{ZPV}}$ <p>kWp – Kilowatt Peak (Size of PV System)</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>S – Annual Solar Radiation kWh/m2 (See SAP)</p> <p>ZPV – Overshading Factor (See SAP)</p> <p>3.87 Consultation responses have raised concerns about the potential for disruption and disturbance caused by building works taking place in phases over a long period of time. <u>Proposals must comply with Policy DM.D2 (xiii) ensuring that traffic and construction activity do not adversely impact or cause inconvenience in the day to day lives of those living and working nearby and do not harm road safety or significantly increase traffic congestion .</u></p> <p>3.88 As with other planning applications, the council will require the submission of a working method statement and a construction logistics plan framework and a site waste management plan prior to development proposal commencement. <u>These must be appropriate and proportionate to the scale and nature of the development proposal, whether outline or detailed, the sensitivity of the context and the types and severity of the anticipated impacts.</u> Working method statements must ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and comply with London Plan (2016) policies 6.3 and 6.14, Merton’s Core Strategy Policy CS20 and policy DM T2 of Merton’s Sites and Policies Plan (2014). Construction logistics plans frameworks must demonstrate how environmental impacts of the development on the local environment, including the surrounding highway network and the amenities of the surrounding occupiers will be minimised. These must also accord with guidance published by the Mayor of London / TfL and London Plan (2016) policies including 7.14 and 7.15. These are particularly important over such a long-term programme to ensure that each new phase of development minimises the impact on residents living within and beside the estates. <u>In accordance with policy DM.D2(xii), construction waste must be minimised on site by managing each type of construction waste as high up the waste hierarchy as practically possible.</u></p>
MM11	EP E7 Landscap e	Page 78	<p>a) Street tree planting must be a key feature of a landscape strategy which links into proposed open space with significant trees, the recreation ground and the adjacent cemetery.</p> <p>b) Landscaping layouts must, where practicable, form green links between open spaces and the public realm, whilst framing visual links from the estate to the adjacent cemetery and recreation ground,.</p> <p>g) c) The estate currently has a group of established mature trees in the central green space. These trees</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>must be retained and be used to inform the design of landscaping, for example to provide cues for the locations of focal points</u></p> <p>e) d) There must be street tree planting on the combined east-west street of Acacia Road, Mulholland Close and Clay Avenue, including the retention of established trees as well as the planting of new trees. <u>Tree planting should create a landscape buffer between new development and any traffic flow on this route.</u> [SENTENCE MOVED FROM E7 d)]</p> <p>d) Additions to existing tree planning must reinforce the linear nature of the east-west street. In addition, tree planting should create a landscape buffer between new development and any traffic flow on the route.</p> <p>e) Tree species must be specified to mitigate against pollution and noise. Planting layout and species need to be considered to ensure an attractive street scene whilst taking care not to restrict light or cause overshadowing to adjacent buildings.</p> <p><u>f) Proposals must ensure appropriate provision of private gardens or amenity space to all new dwellings (houses and flats), having regard to relevant standards and the character of the development</u></p> <p>f) Landscaping proposals must address the perimeter of the estate in a unified manner. Unattractive scrub particularly on Mulholland Close should be removed to improve the setting of established trees and visual links to the surrounding area. Mature trees around the estate should be retained and the boundary treatment enhanced.</p> <p>g) The estate currently has a group of established mature trees in the central green space. These trees must be retained and be used to inform the design of landscaping, for example to provide cues for the locations of focal points</p> <p><u>Further guidance Justification</u></p> <p>[Paragraph 3.89 relocated. Paragraph 3.93 amended]</p> <p>3.90 The estate is a highly urban form in a low density suburban landscape setting. This setting is defined largely by the surrounding large open spaces of Streatham Park Cemetery, Long Bolstead Recreation Ground</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>and the playing fields and open space associated with St. Marks Academy and Lonesome Primary School to the north. This setting is also responsible for the site's isolation relative to surrounding residential development.</p> <p>3.91 At the estate level the urban form isolates the inner landscape, open space and trees from the surroundings, as does scrub vegetation around the site boundaries.</p> <p>3.92 There is much scope to improve views of, and the physical link between the surrounding landscape and the estate, without undermining the calm character it gains from its relative isolation. Linking the landscape to the surrounding area should enable the development to better integrate into the wider suburban area.</p> <p>3.89 <u>There is scope to strengthen green links to the cemetery by terminating north-south streets adjacent to the cemetery with pocket parks. Pocket parks will strengthen green corridors and enhance views of the adjacent landscape</u></p> <p>3.93 Planting arrangements help strengthen the navigation of routes and enhance views between the residential areas either side of the estate. A balance needs to be made between tree planting defining the space whilst not undermining views of the route past the estate. <u>Merton's Sites and Policies Plan Policy DM.O2 (b) to (f) sets out the council's policy on the retention, replacement and potential removal of trees and landscape features. The relevant standards for gardens and private amenity space are set out in Merton's Sites and Policies Plan DM.D2 and the Mayor of London's housing supplementary planning guidance. Gardens should be provided as a single, usable, regular shaped space.</u></p>
MM12	EP E8 Building heights	Page 80	<p><u>Further guidance Justification</u></p> <p>[Paragraphs 3.94, and 3.95 relocated]</p> <p>3.96 The existing estate has a consistently uniform height of three storey buildings with flat roofs, that gives the estate its distinctive character. This presents something of a fortress feel from the outside, but a strong sense of calm enclosure from the inside. This height and isolated location mean the estate is not a dominant form in the wider townscape</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>3.97 Development proposals will need to demonstrate careful consideration of proposed building heights in relation to internal open space and views into the estate from the wider area, across the cemetery and any other longer vantage points. A clear strategy on building heights will be needed to ensure the suburban character of the area is not unduly compromised.</p> <p>3.94 <u>Taller buildings may be appropriate in certain places and careful consideration should be given to ensure they are located so as to appear in harmony and complement the mature vegetation and physically define open spaces. Buildings should not have a negative impact on the surroundings on account of their height and should relate well to the surrounding context and public realm particularly at street level.</u></p> <p>3.95 <u>Taller buildings must be carefully placed so as not to create poor microclimates or large areas of shaded streets or spaces. Where taller buildings are proposed, they should also be used to reinforce the sense of space or the character of a street, rather than fragment it with excessively varied building heights.</u></p>
MM13	EP H1 Townscap e	Page 104	<p>Further guidance <u>Justification</u></p> <p>[Paragraphs 3.130, 3.131 and 3.132 relocated]</p> <p>3.133 Orientation and getting around (legibility) within the estate is difficult mainly because of the siting of the current buildings. There is poor definition of streets and spaces and a lack of built or landscape enclosure to aid this, making it unclear where the private or public spaces are.</p> <p>3.134 The creation of clear and unobstructed views through the design of streets is important for people to find their way around (legibility) the estate and to physically and visually link the estate to the wider area.</p> <p>3.130 <u>Townscape features should be used as a design framework in which to deliver the vision for High Path of an interpretation of the New London Vernacular. Within this framework proposals should create a strongly urban re-imagining of this style with excellent access to public transport. Proposals will be expected to integrate well with the surrounding urban form in terms of layout, scale and massing, whilst making the best possible use of land. How successfully this is done will be a key requirement against which design quality is assessed.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>3.131 <u>The new estate should ensure its built form has a clear definition of private and public space and a range of appropriate landmarks, views (vistas) and focal points to aid orientation around and within the estate.</u></p> <p>3.132 <u>The quality of Morden Road should be improved by enabling the creation of a consistent street width with parallel building lines, tree planting and appropriate building heights either side of the street.</u></p> <p>3.135 The Tramlink extension proposals are still at a feasibility stage. This engagement may also open up opportunities to improve the quality of Morden Road Therefore early engagement with TfL will be required to inform development proposals for this site</p>
MM14	EP H2 Street network	Page 106	<p>a) Nelson Grove Road and Pincott Road provide an appropriate basis for the design of the new street network and must <u>should</u> form the basis of the main <u>pedestrian and cycle</u> routes into and out of <u>and through</u> the estate. <u>The extension of Nelson Grove Road from Abbey Road in the east to Morden Road in the west will help provide an east to west link, and should aim to have with clear views along substantial sections and, ideally, its whole length.</u></p> <p>b) The position of the historic street of High Path should be retained and the road should allow for improved accessibility from High Path to Nelson Gardens. The street should also respect the setting of St John's the Divine Church.</p> <p>c) Hayward Close, which complements the historic street pattern with its attractive tree-lined character must be retained.</p> <p>d) Increased accessibility for pedestrians and cyclists must be designed into the street network.</p> <p>e) The existing level of vehicular links along Merton High Street must be retained.</p> <p>f) e) <u>Provisions for future extensions of the north-south streets ending at High Path southwards towards to Merantun Way must be a possibility should be explored,</u> subject to TfL's support.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>Further guidance Justification</u></p> <p>[Paragraphs 3.137, 3.138, 3.139, 3.140 and 3.141 relocated]</p> <p><u>3.142</u> This policy section is about the creation of clearly defined and understood streets. It does not define vehicular movement. This is addressed by policy EP H3.</p> <p><u>3.143</u> Development of a new network of streets should ensure that the neighbourhood is easy to get around and understand, and be accessible for all users. This includes ensuring clear and seamless links between the estate and the surrounding neighbourhoods (which do not currently exist), and extends the grid-iron network of streets from the north, into the estate. The new street network supports the ‘New London Vernacular’ guiding characteristic for High Path Estate which is explained in more detail in Section 2 of the Plan.</p> <p><u>3.144</u> The creation of traditional streets north to south will help integrate and re-connect the estate to its surroundings. The creation of clear east to west link will help bring together all the different new character areas and offer a safe cycle and pedestrian priority link across the estate.</p> <p><u>3.137</u> A new north-south street between Hayward Close and Pincott Road should be provided, linking Merton High Street and High Path to help link the estate with the surrounding road network.</p> <p><u>3.138</u> A new north-south street between Pincott Road and Abbey Road, linking Merton High Street and Nelson Grove Road should be provided. These new streets will help connect the new neighbourhood effectively and efficiently with the existing grid pattern layout.</p> <p><u>3.139</u> Layouts should be designed to future-proof pedestrian access from South Wimbledon tube station directly into the estate should TFL support a second entrance to the tube station in the future. This would be located to the rear of the station building to link Morden Road and Hayward Close. This would increase public transport accessibility and provide additional pedestrian routes into and out of the new neighbourhood.</p> <p><u>3.140</u> Mews Street style development should be reserved for shorter streets – the existing Rodney Place is a good example.</p> <p><u>3.141</u> Whilst Rodney Place is outside the estate boundary, linking it improving the link into the new street</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>pattern of the estate should be explored as this could help improve links within the area and make it easier to get around <u>considered in order to both protect its character and improve access from it to the surrounding streets.</u></p>
MM15	EP H3 Movement and access	Page 108	<p>a) The main vehicle routes within the estate are currently Pincott Road and Nelson Grove Road, which are located centrally within the estate. Their character and layout must resemble a traditional street and serve the needs of all users, without the need to provide separate or segregated facilities for cyclists.</p> <p>b) Streets in the estate must connect in an open and easy to understand way that encourages movement by pedestrians and cycles. All streets must be safe, attractive and sociable places designed so as to manage vehicle speeds. Where streets are closed to vehicles at one end they must not restrict the possibility of vehicular movement in the future. <u>The existing number of vehicular links into the estate along Merton High Street must be retained.</u></p> <p>c) Proposals must include <u>make provision for</u> measures to reduce the physical barrier (severance) caused by Morden Road to east-west pedestrian and cycle movement to better link The Path and Milner Road with the estate.</p> <p>d) The pedestrian and cycle access from the south-east corner of the estate towards Abbey Mills and Merantun Way must be improved in quality. <u>The council's ambition is for better pedestrian facilities on the roundabout serving Abbey Mills, and reassessment of the siting of the existing pedestrian crossing by the River Wandle Bridge and its approach from Abbey Road.</u></p> <p>e) <u>Vehicular 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.</u></p> <p>f) Discussions will be required with TfL to demonstrate how any proposals for a Tramlink extension can be incorporated as part of any development proposals. Proposals should demonstrate how any implications of a potential Tramlink extension to South Wimbledon could be accommodated.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>Further guidance <u>Justification</u></p> <p>[Paragraphs 3.145, 3.146, 3.147, 3.148, 3.149, 3.150, 3.151, 3.152, 3.153, 3.154, 3.155, 3.156, 3.157, 3.158, 3.159 and 3.160 relocated. Paragraph 3.154 also amended]</p> <p><u>3.153</u> This policy section is about establishing the main vehicular movement strategy. This is different from the creation of streets, which may, or may not support through vehicular movement. <u>Proposals for vehicular movement must be supported by appropriate traffic modelling and be in general compliance with relevant transport policies, whilst also aiming to achieve good vehicular permeability and convenience for residents.</u></p> <p><u>3.155</u> The estate is predominantly surrounded by busy main roads and junctions. As a result, vehicular access is controlled to deter rat-running through the estate. Access is from a one-way entry point into Pincott Road from Merton High Street to the north; access from Abbey Road to the east, an exit from High Path onto Morden Road to the west; and from Merantun Way to the south, where traffic movements are left and right into High Path, but restricted to left out only from High Path. <u>The surrounding busy road network forms physical barriers to movement, especially for pedestrians and cyclists. This is particularly acute on Morden Road and Merantun Way and reinforces the need to better connect the estate to neighbouring areas.</u></p> <p><u>3.156</u> Similarly where Merantun Way crosses the River Wandle, this stops the estate from connecting with the wider surrounding area. <u>Reviewing movement and crossing opportunities could help ease some of these connectivity issues.</u></p> <p><u>3.159</u> High Path runs along the southern boundary of the estate. The road is traffic calmed and the western section beyond Pincott Road is one way towards Morden Road where it also passes Merton Abbey Primary School and St John the Divine Church. <u>The vehicular exit onto Morden Road is restricted to left turn only, this manoeuvre can be particularly acute for large vehicles due the limited amount of turning space available. There is also a cycle lane along the northern footway.</u></p> <p><u>3.158</u> Within the estate many of the pedestrian and cycle routes are poorly defined, which makes it difficult to distinguish between public and private areas. <u>The building layout makes the estate feel unsafe and unwelcoming.</u></p> <p><u>3.157</u> Widespread congestion in the local area brings specific problems to the estate. This relates primarily to</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>Abbey Road being used as a cut through to avoid the heavily congested South Wimbledon junction on the north-west corner of the estate. Physical measures are widely applied across the area to manage traffic speeds. Regeneration of the estate provides an opportunity to tackle the wide range of traffic issues the area faces.</u></p> <p><u>3.145 The potential for Abbey Road to be continued directly southwards to make a new junction with Merantun Way to make a more easy to navigate road layout should be explored. This could simplify the layout and the amount of road space taken. This approach could also support the siting of new bus stop facilities in the area.</u></p> <p><u>3.147 Should the land between High Path and Merantun Way become available for redevelopment this could provide the opportunity for a more comprehensive redesign of Merantun Way to form a boulevard style street with, tree planting, footways and segregated cycle lanes, whilst still maintaining its important movement function. Proposals should take account of this opportunity.</u></p> <p><u>3.148 Proposals likely to have an impact on Merantun Way or the wider Strategic Road Network should be discussed at an early stage with Transport for London.</u></p> <p><u>3.149 As part of their Transport Assessment, applicants should, at the outline stage, look specifically at the impacts of increased population density on the needs of the bus network. This should include reviews of bus stop locations, routes and service frequencies.</u></p> <p><u>3.160 The one-way section of High Path currently experiences localised congestion – notably associated with the primary school – including conflict between vehicles and cyclists, as well as a restricted junction with Morden Road. There is potential to review how this street operates in order to resolve these issues and improve conditions for users, notably for cyclists. The crossing of Morden Road and potential future tram extension will need to be considered as part of this.</u></p> <p><u>3.161 Recent demand forecasting work by TfL suggests that current annual passenger demand will rise from 31m to around 56m by 2031 even without Crossrail 2, which would serve the nearby Wimbledon town centre. As part of accommodating this growth, TfL is planning a range of improvements to Tramlink, including network capacity and service frequency enhancements on the Wimbledon branch. To achieve this, TfL is currently exploring a new tram line extension to serve the South Wimbledon and/ or Colliers Wood area. Work</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>on this is continuing, and any proposals regarding regeneration of the estate will need to take account of these developing proposals.</u></p> <p>3.151 <u>Proposals for expanding the tram network include the possibility of terminating a new branch line at South Wimbledon. The street layout should be designed so as to accommodate this. In doing so, it should also facilitate the creation of a boulevard style street and address existing severance issues caused by the existing conditions at Morden Road.</u></p> <p>3.162 <u>Preparation of development proposals for the estate will require the applicant to engage with TfL to ensure future delivery of the necessary transport infrastructure, including for the tram should it affect the estate.</u></p> <p>3.163 <u>Delivery of the Tramlink extension would increase access to public transport in an area identified in the London Plan for intensification and population growth.</u></p> <p>3.164 <u>Located beside South Wimbledon underground Station, the estate is attractive to commuters to central London as well as parking from nearby businesses. This has led to parking on the estate by businesses and commuters causing parking problems for residents. This is possible because existing parking controls have been implemented in a piecemeal manner, resulting in a disjointed and ineffective regime overall.</u></p> <p>3.146 <u>Well-designed on-street parking provision helps create activity, vitality and provides overlooking of the street (natural surveillance). Where provision of parking is on-street it is important that this is arranged and managed in a sensitive manner. Where parking is provided off-street at ground level, with garden podiums above, care needs to be taken to ensure a positive active street frontage and good internal design to the residential units that wrap around the parking.</u></p> <p>3.154 <u>Vehicular and cycle parking on the estate will be provided in accordance with the London Plan (as amended) parking standards taking into account specific local conditions and requirements. This should be supported by a comprehensive Parking Management Strategy.</u></p> <p>3.150 <u>With increased density of development, parking management will need to be improved for the whole estate with a coherent and comprehensive parking strategy submitted to the council which addresses the parking demands and pressures from residents, businesses and commuters in this high PTAL location. The</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>submitted Parking Management Strategy should that protect access and prevent indiscriminate parking. Provision of a Controlled Parking Zone (CPZ) should be actively considered as a means of achieving this.</u></p> <p>3.152 <u>Increased density combined with changing shopping trends will create an increased level of demand for servicing and deliveries, along with the everyday needs for refuse collection etc. Proposals should investigate a range of traditional and innovative methods of addressing and managing servicing needs to minimise vehicle movements and parking requirements. Proposals for the whole estate should include a Servicing and Delivery Strategy.</u></p>
MM16	EP H4 Land Use	Page 112	<p>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, <u>with the existing number of affordable homes re-provided.</u> Non-residential uses may be appropriate to support employment, community activities and street vibrancy.</p> <p>b) Densities should not be solely focused around figures, but must be assessed as a product of a range of relevant design, planning, social, environmental and management factors. Exceeding the current <u>London Plan</u> density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.</p> <p>c) All new buildings must maximise the number of entrances and windows facing onto the street (active frontages) and for residential uses must provide well defined semi-private space between the front of the building and the street (defensible space) e.g. for landscaping and the storage of bins etc.</p> <p><u>Further Guidance Justification</u></p> <p>[Paragraphs 3.165, 3.166 and 3.167 relocated. Paragraph 3.168 amended]</p> <p>3.168 <u>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 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</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>relevant policy requirements. 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.</u></p> <p>3.169 Proposals should also consider transport capacity, employment connectivity, the location and characteristics of the site and social infrastructure when determining an appropriate density. Development proposals should contribute to the delivery of a sustainable neighbourhood by building more and better quality homes and demonstrate how the density responds to the local context, particularly in terms of design. Proposals should demonstrate graphically how density is sympathetic to the surrounding townscape and distributed in appropriate locations in a mix of buildings to deliver a variety of well-designed new homes and public spaces.</p> <p>3.170 Development proposals will be expected to contribute to optimising the latest borough and London housing supply requirements in order to meet local and strategic need. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, Local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet resident's individual needs.</p> <p>3.165 <u>Wherever practicable, different types of residential development (e.g. apartments, maisonettes and houses) should be arranged across the estate in a way that reinforces local character.</u></p> <p>3.166 <u>Different street types should support residential types that are suitable to them. Therefore smaller scale, shorter and narrower streets will be more suitable for town houses and mews development. Wider, longer streets, with more vehicular traffic, will be more suitable for flats and maisonettes.</u></p> <p>3.171 In accordance with policy DM E4 (Local Employment Opportunities) major developments proposals will</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>be expected to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. Merton's Local Plan identifies a local deficiency in convenience retail provision to the east side of the estate. Any proposals for retail provision will need to accord with Merton's Local Plan policies including CS7 (Centres) and DM R2 (Development of town centre type uses outside town centres).</p> <p>3.172 The site is bounded by major roads on two sides, lined predominantly by shops, cafes, restaurant and similar uses. Subject to meeting the Local Plan policies, provision of such uses (e.g. retail shops, financial and professional services, café/ restaurants, replacement of public houses, offices, community, health, leisure and entertainment uses) may contribute to meeting the day to day needs of the local population. This would complement the area and provide services and facilities that may be needed. This also supports the principles of local context, sustainable development and active frontages.</p> <p>3.167 <u>The frontages to Morden Road and Merton High Street may be appropriate locations for the provision of a range of commercial and community uses to support the new development subject to meeting relevant Local Plan policies.</u></p> <p>3.173 Based on the Local Plan Sites and Policies Plan Policy DM R2, the council supports the replacement of the existing convenience shop (i.e. shop selling everyday essential items) in Pincott Road. Any proposed new local convenience shop which is located outside the designated town centre and parades boundary and is above 280m² will be subject to sequential test and impact assessment.</p>
MM17	EP H5 Open space	Page 116	<p>a) Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with London Plan policy 7.18 'Protecting Open Space and addressing Deficiency'.</p> <p>b) Suitably designed play space(s) for all age groups must be provided in accordance with <u>having regard to</u> the Mayor of London's 'Play and Informal Recreation' supplementary planning guidance document (2012).</p> <p>c) All new houses must have gardens that meet or exceed current space standards.</p> <p>c) Development proposals must be supported by an analysis of the current and future need for the provision</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>of indoor and outdoor sports facilities in order to support the population arising from the proposals. Any proposals should have regard to Sport England’s Planning for Sport Aims and Objectives to protect or relocate existing facilities, enhance the quality, accessibility and management of existing facilities and provide new facilities to meet demand.</u></p> <p>Further guidance <u>Justification</u></p> <p>[Paragraph 3.174 deleted and paragraph 3.178 amended]</p> <p>3.174 The number of open spaces and their individual size is not prescribed. Open space may be provide in the form of a single space or a number of smaller spaces. However, proposals intending to provide multifunctional space should preferably provide one large area.</p> <p>3.175 Open space should be located in the most accessible points for all residents of the new neighbourhood. Open spaces should be situated in relation to size and function, for example larger spaces should be centrally located and smaller spaces evenly distributed across the neighbourhood, to ensure all residents have access to open space. Deciding the location of public open space should, where possible, take as its cue the existing mature vegetation on the site, and incorporate it into any new public spaces.</p> <p>3.176 The individual design of public open spaces, themes and vegetation used, should have some local relevance, and include public art in a range of forms and media.</p> <p>3.177 The estate is within easy access to a variety of public parks including Nelson Gardens, Wandle Park, Nursery Road Recreation Ground and Haydons Road Recreation Ground. However, following a review in 2015 of the public open spaces surrounding the Estates Local Plan sites, updated Greenspace Information for Greater London (GiGL) calculations show that a relatively small area (0.5ha) on the eastern part of the site, near Doel Close and Merton Place, is deficient in access to Local Open Spaces (please refer to GiGL’s revised June 2015 maps, which are attached in Appendix 2).</p> <p>3.178 Development proposals should demonstrate how proposed new public open space would address the identified deficiency in access to public open space. and that the appropriate minimum standards concerning the provision of outdoor amenity space and play space have been achieved. Any proposal should clearly demonstrate how the play space needs of all age groups will be addressed, having regard to the Mayor of</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>London's 'Play and Informal Recreation' Supplementary Planning Guidance document (2012).</u></p> <p>3.179 Where the provision of a large public open space is justified, the design of the space should be flexible enough in terms of scale, layout and design so that it is capable of accommodating a variety of activities such as food growing, playgrounds, sports courts, informal and flexible space which can support occasional use for a broad range of community events. Development proposals must be in accordance with para. 74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>3.180 Similarly, provision of a group of mid-sized spaces and pocket parks should create areas of local human scale and intimacy that have local relevance, good surveillance and are used largely by the local community.</p> <p>[New paragraph] <u>Development proposals should demonstrate the impact that they will have on the use of existing indoor and outdoor local sports facilities. The scope and methodology of the research will be prescribed by Sport England and the local planning authority, during pre-application discussions. Any identified shortfall should be mitigated where appropriate through either a condition attached to a planning decision, a section 106 agreement or the Community Infrastructure Levy (CIL) as identified at the planning decision making stage. In accordance with the NPPF and the London Plan, Merton Council is committed to delivering a new playing pitch study in support of the planned borough-wide Local Plan.</u></p>
MM18	EP H6 Environme ntal Protection	Page 118	<p>a) Retention of the existing mature tree groups and street trees, including the trees fronting Merton High Street east of the junction with Pincott Rd, 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.]</p> <p>b) a) Applicants must demonstrate how their plans contribute to improving air quality and provide evidence to demonstrate that passive ventilation strategies employed to prevent overheating will not inadvertently expose residents to poor air quality or unacceptable levels of external noise during periods of warm weather.</p> <p>c) b) New street trees should be planted and maintained, particularly on Pincott Rd and Nelson Grove Road to form the basis of a green corridor network across the estate based on the existing avenue of Hayward</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>Close. All new or altered tree pits should be considered as part of sustainable urban drainage systems.</p> <p>d) c) In accordance with the London Plan policies 5.12 Flood Risk Management and 5.13 Sustainable Drainage and the supporting Design and Construction Supplementary Planning Guidance (SPG April 2014), the proposed development must aim to reduce post-development runoff rates as close to greenfield rates as reasonably possible practicable.</p> <p>e) d) Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan Policy 5.13 Sustainable Drainage hierarchy as possible.</p> <p>g) e) The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development taking the latest climate change allowances into account. Potential overland surface water flow paths should be determined and appropriate solutions proposed to minimise the impact of the development, for example by configuring road and building layouts to preserve existing surface water flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p> <p>f) Sustainable Drainage Systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives, for each of the following multi-functional benefits:</p> <ul style="list-style-type: none"> • Blends in and enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>h) g) The feasibility of Combined Heat and Power (CHP) and district heating must be investigated. As a minimum this should include:</p> <p>(i) An assessment of the secondary heat sources within a 400 metre radius of the site boundary (e.g. river</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>water heat recover from the Wandle; heat extraction from the London Underground).</p> <p>(ii) Evidence to demonstrate ongoing engagement with key stakeholders associated with the potential secondary heat sources, such as Transport for London and the Environment Agency feasibility.</p> <p>(iii) Evidence that the CHP has been designed and built in line with the London Plan <u>policy 5.6: Decentralised energy in development proposals</u> and associated guidance (e.g. the Mayor's draft Air Quality SPG) which seeks high air quality standards and mitigates air quality impacts as well as reducing carbon emissions specifically in respect to:</p> <ul style="list-style-type: none"> • <u>Plant size and specification</u> • <u>Plant-room design</u> • <u>Future network connectivity</u> • <u>Air quality standards.</u> <p>(iv) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.</p> <p>(v) When preparing development proposals in accordance with Policy 5.3: <u>Sustainable design and construction</u> of the London Plan, proposals should include suitable comparisons between existing and proposed developments <u>at each stage of the energy hierarchy</u> in order to fully demonstrate the expected improvements. All new developments proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure and sustainable procurement of materials.</p> <p>i) Technological improvements in battery storage have started to provide a potential energy storage solution</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>suitable for use in connection to domestic solar PV systems. The use of on-site storage offers a potential technological solution that would increase on-site renewable energy consumption, reduce utility costs and provide in-situ demand-side management. Battery storage can therefore be considered to sit within the 'be lean' or middle level of the energy hierarchy. Domestic PV installations should therefore not be considered without exploring the potential for on-site energy storage. Carbon savings from the incorporation of appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero.</p> <p><u>h) All domestic solar PV installations should be considered in conjunction with on-site battery storage.</u></p> <p><u>i) Development proposals must be accompanied by a working method statement and construction logistics plan framework that are appropriate and proportionate to the scale and nature of the proposal, whether outline or detailed, the sensitivity of the context and the types and severity of the anticipated impacts.</u></p> <p><u>j) Development proposals should demonstrate, by means of the submission of a site waste management plan, how they will apply the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location using the most appropriate means.</u></p> <p>Justification</p> <p>[Paragraph 3.194 relocated and amended. Paragraph 3.195 relocated]</p> <p>3.181 An open section of the Bunces ditch (which is a designated main river) exists to the south of Merantun Way. There is a possibility that this may have origins or an historic connection within the High Path estate and this should be fully investigated prior to the finalisation of any masterplan and development taking place.</p> <p>3.182 The early design stages for any development proposals for the estate provides opportunity to incorporate landscaping and permeable surfaces that enable and enhance biodiversity and reduce surface water run-off. Currently, whilst there is a lot of space between buildings, this is very poorly defined, and much of it is hard-standing. This leaves little opportunity for biodiversity or SuDs.</p> <p>3.183 There are, however, areas with groups of mature and semi-mature trees that can form the basis of green chains, SuDS and a sustainable 'green' network of spaces across the estate. They should help to link</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>the estate with Abbey Recreation Ground to the west and the River Wandle to the east. Trees can also help with air and noise pollution strategies.</p> <p>3.184 The close proximity of the River Wandle and its tributaries means that the western areas of the estate are within Flood Zone 2. Some areas of the estate are also shown to be at high risk of surface water flooding identified on Environment Agency flood maps, so it is important that its redevelopment does not increase flood risk and where possible, seeks to improve matters.</p> <p>3.185 As already set out in national policy, the London Plan and Merton’s adopted development plan:</p> <p>Development proposals will need to include appropriate flood mitigation measures to ensure the development is safe and does not increase the risk of flooding both from and to the development.</p> <p>Any development coming forward will be subject to a Sequential Test, Exception Test and site-specific Flood Risk Assessment to deal with all sources of flooding, which must have regard to Merton’s Strategic Flood Risk Assessment and Local Flood Risk Management Strategy.</p> <p>Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk and following the sequential approach. This includes careful consideration of where buildings should be located within the site.</p> <p>3.186 As different parts of High Path have been identified as at risk from surface water and river flood risk and there have been historic incidences of surface water flooding in the area, development proposals must demonstrate they have aimed to achieve as close to greenfield run-off rates as possible, using SuDS and considering surface water management as high up the London Plan (policy 5.13) drainage hierarchy as possible.</p> <p>3.187 SuDS can include a wide range of measures such as rain gardens, green roofs, balancing ponds, filter strips, green verges and swales. It is important that development proposals demonstrate how SuDS measures are not only considered as drainage solutions but as features to improve the townscape and public realm of the High Path estate, to enhance biodiversity, to provide recreation and to improve water quality and efficiency.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>3.188 Developers are advised that tools such as the SuDS management train will assist with this process and with demonstrating that all of these issues have been considered. This approach will help create an attractive estate with the benefit of cost efficiencies.</p> <p>3.189 The Mayor of London’s Sustainable Drainage Action Plan (draft) and Sustainable Design and Construction supplementary planning guidance and the government’s National Standards for Sustainable Drainage set out the requirements for the design, construction operation and maintenance of SuDS.</p> <p>3.190 High Path is located beside main roads. Consideration of air quality issues is important in order to understand the long term air quality benefits that might arise from the growth of a district heating network with the High Path Estate as an energy centre nucleus.</p> <p>3.191 Local environmental conditions such as air quality, noise and overheating must be taken into consideration during the design process. <u>The scheme should be designed and built in accordance with relevant local guidance (including London Plan policies 5.6: Decentralised energy in development proposals and 7.14: Improving air quality, the London Heat Network Manual, Merton’s District Heating Feasibility – Phase 1: Heat Mapping and Energy Masterplanning study, and Merton’s draft Air Quality SPG).</u> Careful consideration should be taken in order to ensure that efforts to mitigate against these issues does not result in unforeseen negative impacts.</p> <p>3.192 Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes. However, the measurement of local sustainability policies (CS15) and regional policy targets (London Plan Chapter 5) for new build developments are based on improvement that are also measured through Part L of the Building Regulations. While this information is useful to help measure performance, it does not make it easy to compare the energy performance of existing buildings with new buildings.</p> <p>3.193 Energy performance data on existing buildings will be held for many sites in the form of Energy Performance Certificates which measures the predicted energy consumption per m² in a development. By providing the energy performance data from Energy Performance Certificates, building energy performance can be compared between existing and future development using a metric that is suitable and easily comparable, thus helping to clearly demonstrate the potential for environmental improvements.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>3.194 The principles of sustainable design and construction are designed to be holistic and are more wide ranging than energy performance alone. Development proposals should demonstrate wherever possible environmental improvements using the comparison of quantifiable measures, where possible, and qualitative appraisals, where appropriate. In this way the environmental improvements that will be delivered through regeneration should <u>can be easily compared with the performance of existing buildings in an easily compared manner.</u></p> <p>3.195 Passive ventilation strategies cannot be considered in isolation of potentially negative external environmental factors such as air quality or noise. Energy strategies that rely on passive ventilation should clearly demonstrate that occupants will not be adversely affected by air and noise pollution during periods of warmer weather.</p> <p>3.196 Technological improvements in the field of energy storage have resulted in the improved feasibility of deploying battery storage in connection with domestic solar PV systems. and the The need to develop polices to support Innovative Energy Technologies <u>innovative approaches</u> is outlined in London Plan Policy 5.8: <u>Innovative energy technologies</u>. Battery storage can be utilised as a method of increasing on-site renewable energy consumption, <u>providing and provide</u> in-situ energy demand management to reduce pressure on the national grid during peak time, and increasing the efficiency of energy supply. In this way battery storage can be considered to be a 'be clean' measure within the Mayers energy hierarchy: <u>outlined in London Plan policy 5.2: Minimising carbon dioxide emissions</u>. The <u>Standard Assessment Procedure (SAP) standard approach for calculating the energy output from solar PV assumes a 20% reduction in PV output from distribution losses of the energy produced is lost through transmission</u> across the national electricity grid. Therefore, at present, there is no method of capturing the benefits of on-site energy storage within the Standard Assessment Procedure (SAP) or recognising the benefits of energy storage through the planning process. In order to recognise the benefits of on-site energy storage to residents and the grid operator the incorporation of appropriately sized solar PV systems should calculate solar output using the following equation, assuming the distribution losses are zero. <u>Energy strategies that utilise appropriately sized solar photovoltaics in tandem with on-site battery storage may account for the associated carbon benefits by recouping the 20% of solar photovoltaic output traditionally discounted under SAP as 'distribution loss'. This additional carbon saving may be calculated using the below equation and then discounted from any carbon emissions shortfall for the wider development as a whole.</u></p> <p><u>kWh/year = kWp x S x ZPV x 0.2</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>(Carbon savings from battery storage)</u></p> <p>Output of System (kWh/year) = kWp x S x ZPV</p> <p>kWp – Kilowatt Peak (Size of PV System)</p> <p>S – Annual Solar Radiation kWh/m2 (See SAP)</p> <p>ZPV – Overshading Factor (See SAP)</p> <p>3.197 Consultation responses from residents living within and near High Path have raised concerns about the potential for disruption and disturbance caused by building works taking place in phases over a long period of time. <u>Proposals must comply with Policy DM.D2 (xiii) ensuring that traffic and construction activity do not adversely impact or cause inconvenience in the day to day lives of those living and working nearby and do not harm road safety or significantly increase traffic congestion.</u> As with other planning applications, the council will require the submission of a working method statement, and a construction logistics plan framework and a site waste management plan prior to development proposal commencement. <u>These must be appropriate and proportionate to the scale and nature of the development proposal, whether outline or detailed, the sensitivity of the context and the types and severity of the anticipated impacts.</u> Working method statements must ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and comply with London Plan (2016) policies 6.3 and 6.14, Merton’s Core Strategy Policy CS20 and policy DM T2 of Merton’s Sites and Policies Plan (2014). Construction logistics plans frameworks must demonstrate how environmental impacts of the development on the local environment, including the surrounding highway network and the amenities of the surrounding occupiers will be minimised. These must also accord with guidance published by the Mayor of London / TfL and London Plan (2016) policies including 7.14 and 7.15. These are particularly important over such a long-term programme to ensure that each new phase of development minimises the impact on residents living within and beside the estates. <u>In accordance with policy DM D2 (xii), construction waste must be minimised on site by managing each type of construction waste as high up the waste hierarchy as practicable.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
MM19	EP H7 Landscape	Page 124	<p>Required</p> <p><u>a) Retention, where appropriate, of the existing mature tree groups and street trees indicated on the diagram for Policy H7 should 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.</u></p> <p>Regarding the following specific tree groups:</p> <p>i) The existing mature tree group fronting Merton High Street east of the junction with Pincott Road must be retained. The isolated trees to the west of Pincott Road must be retained and augmented with new planting. this is in order to retain and enhance the trees as a key linear landscape asset and to mitigate against local traffic pollution.</p> <p>ii) The mature trees along Hayward Close must be retained and augmented with new tree planting along the whole length of the street. This is in order to strengthen the attractive ‘avenue’ character of this street.</p> <p>iii) The mature trees in the vicinity of the playground within the ‘Priory Close’ block must be retained.</p> <p>iv) The line of mature trees in the car park between the ‘Ryder House’ and ‘Hudson Court’ blocks must be retained.</p> <p>v) The mature trees in the playground to the north of the ‘Marsh Court’ block.</p> <p>vi) the mature trees to the west and south of the ‘Merton Place’ block, and to the north of the ‘DeBurgh House’ block must be retained.</p> <p>b) Landscaping must be a key feature in the provision of private space fronting houses and blocks of flats (defensible space). Frontages must be designed to incorporate, where feasible, soft landscaping, appropriate planting and permeable surfaces.</p> <p>c) Street trees must be located to enable the creation of well defined on-street parking spaces. This will soften</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>the visual impact of vehicles and enhance the appearance of the street.</p> <p><u>d) To optimise the look and feel of High Path, landscaping in the public open spaces and communal gardens must be well designed, consistently well maintained and fully accessible for people with a range of needs.</u></p> <p>d) Landscaping in the public open spaces and communal gardens must be of the highest quality , accessible and meet the needs of the residents by complying with the relevant policy requirements</p> <p><u>e) Tree species must be specified to mitigate against pollution and noise. Planting layout and species need to be considered to ensure an attractive street scene whilst taking care not to restrict light or cause overshadowing to adjacent buildings.</u></p> <p><u>f) Proposals must ensure appropriate provision of private gardens or amenity space to all new dwellings (houses and flats), having regard to relevant standards and the character of the development.</u></p> <p><u>Further guidance Justification</u></p> <p>[Paragraphs 3.198 and 3.200 relocated and paragraphs 3.199, 3.201, 3.202 and 3.203 relocated and amended]</p> <p><u>3.203</u> Retaining <u>significant trees or groups of trees</u>, as with historic streets, provides the basis from which to develop design proposals. <u>It provides benefits in terms of promoting biodiversity, sustainable development, contributing to flood risk mitigation and helping to reduce air pollution. In relation to the specific tree groups identified in the diagram to this policy, together with other existing trees, regard should be had to up to date arboricultural surveys and assessments and Merton’s Sites and Policies Plan Policy DM 02 (b) to (f).</u></p> <p>3.202 The retention of trees has clear benefits in promoting biodiversity, sustainable development and contributing to flood risk mitigation and help reduce air pollution.</p> <p><u>3.198</u> The mature trees and vegetation on the south side of High Path should be retained with good <u>management.</u></p> <p>3.199 The case for retention or felling of trees – other than those groups specifically identified in this policy –</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>on the estate, will be based on the tree survey undertaken by the Council's arboricultural officer.</p> <p>3.200 <u>Proposals should ensure the provision of a good variety and quantity of street trees.</u></p> <p>3.204 Landscaping has the potential to improve the quality of a place, but this will only work if it is appropriate to the location and there is a clearly defined, funded and managed maintenance regime in place.</p> <p>3.204 <u>The design of streets should include the provision of soft landscaping that is appropriate, robust and efficient to maintain. Planting arrangements help strengthen the navigation of routes and enhance views between the residential areas either side of the estate. A balance needs to be made between tree planting defining the space whilst not undermining views of the route past the estate. Merton's Sites and Policies Plan Policy DM O2 (b) to (f) sets out the council's policy on the retention, replacement and potential removal of trees and landscape features.</u></p> <p><u>The relevant standards for gardens and private amenity space are set out in Merton's Sites and Policies Plan DM.D2 and the Mayor of London's housing supplementary planning guidance. Gardens should be provided as a single, usable, regular shaped space.</u></p>
MM20	EP H8 Building Heights	Page 126	<p>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 <u>existing heights</u> along Morden Road and Merantun Way, but could be marginally <u>moderately</u> higher than the <u>existing heights</u> in the more sensitive areas of High Path, Abbey Road, Rodney Place and Merton High Street</p> <p>Building heights must be based on a comprehensive townscape appraisal and visual assessment which builds on the analysis included in this document. Any strategy for building heights must make a positive contribution to the existing townscape, character and local distinctiveness of the area.</p> <p>Taller buildings may be considered appropriate to facilitate intensified use of the site. Such buildings must be located appropriately and relate well to the surrounding context and public realm, particularly at street level.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>b) Merton High Street Buildings fronting Merton High Street must be of a scale that relates well to the building heights on the north side. They must not result in a lop-sided feel to the street or create unacceptable shadowing or blocking of sunlight. They must contribute to ‘mending’ the high street and stitching the estate seamlessly back into the existing urban fabric.</p> <p>c) Morden Road: Land around the Tube station and Morden Road is part of the focus of activity and uses in the local area. The street is quite wide and taller buildings are beginning to be built along Morden Road. This is the most suitable location on the estate for the tallest buildings and cues must be taken from emerging buildings to guide what is appropriate. Along Morden Road a consistent height must be sought, which is complementary to creating a boulevard feel to the street. <u>The transition between new taller buildings on the Morden Road edge of the estate and new lower buildings further east into the estate and the effects on the visual environment should be properly managed and designed.</u></p> <p>d) Abbey Road: Buildings on the west side of Abbey Road must relate well to the existing housing on the east side and newer flats on the west side. Building heights should help create a consistent feel to the street, integrate well visually with the existing housing and not create a lopsided feel to the street. It is likely these will be lower in height than the buildings in the main part of the site.</p> <p>e) High Path: High Path currently lacks a sense of enclosure as the buildings along it do not address the street. New development should rectify this. There is scope to reinforce the narrow enclosure and intimate feel of this street particularly from Morden Road to Pincott Road. Building heights along High Path must reflect its historic character as a narrow historic street and ensure that it sensitively takes account of the setting of St John the Divine Church.</p> <p>f) Merantun Way Land outside the estate boundary fronting Merantun Way is suitable for taller buildings to promote the transformation of this road into a boulevard street. Appropriate heights here will depend on the dimensions of a redesigned street and the possibility of urbanised development on the south side of the road. Heights similar to those appropriate for Morden Road are likely to be appropriate here.</p> <p>g) Station Road, Abbey Road and Merantun Way: Where Station Road, Abbey Road and Merantun Way meet is a sensitive area as there are likely to be awkward shaped sites. The close proximity of Rodney Place and Merantun Way create a need to respect existing low-rise development as well as retaining the most of the potential for taller buildings fronting Merantun Way. Building heights in this area must particularly respect, and</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>be sensitive to, these constraints and opportunities.</p> <p><u>Further guidance Justification</u></p> <p>[Paragraphs 3.205 and 3.206 relocated]</p> <p><u>3.207</u> The existing estate has a wide range of building styles and heights. A more even distribution of heights will reduce these negative characteristics and help new development fit in comfortably with its surroundings. It will also create neighbourhood streets that are easy to understand. In order to fit well with the surroundings, it is important to ensure building heights on the edge of the estate relate appropriately to those adjacent to it.</p> <p><u>3.205</u> <u>Taller buildings must be carefully placed so as not to create poor microclimates or large areas of shaded streets or spaces. Where taller buildings are proposed, they should also be used to reinforce the sense of space or the character of a street, rather than fragment it with excessively varied building heights. Building heights should be similar along the lengths of street and one either side in order to maintain a consistent character.</u></p> <p><u>3.206</u> <u>The potential widening of Morden Road to accommodate a tram extension should be taken into consideration, should this proposal go ahead, the resulting adjustment to street proportions may better accommodate taller buildings on the east side of Morden Road, however the transition to lower buildings further east into the estate and effects on the visual environment should be properly managed and designed.</u></p> <p>[Policy H8 f] relocated and amended as new paragraph]</p> <p><u>[New paragraph]</u> <u>Building heights on the southern boundary of the estate, in the vicinity of High Path, should take account of the potential for taller buildings to be developed fronting Merantum Way, to promote the transformation of this road into a boulevard street. Appropriate heights at Merantun Way are likely to be taller than currently exists, depending on the dimensions of a redesigned street and the possibility of urbanised development on the south side of the road. Heights similar to those appropriate for Morden Road are likely to be appropriate here.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
MM21	EP R1 Townscap e	Page 150	<p>a) Proposals will be expected to provide widening and landscape improvements into the Ravensbury Park entrance adjacent to Ravensbury Mill <u>to improve and enhance the entrance's setting and create clearer views into the park from Morden Road.</u></p> <p>b) The corner of the estate adjacent to Ravensbury Park will be expected to make an architectural statement which sensitively addresses the park entrance, river and mill buildings.</p> <p>c) Proposals will be expected to reinforce the corner of the estate opposite the Surrey Arms Public House as a space and a place. Proposals should have a sensitive relationship to the pub</p> <p>d) The setting around the entrance to Ravensbury Park must be improved and enhanced. The architecture and design of buildings should draw upon the surrounding good quality townscape such as Ravensbury Mill, The Surrey Arms and White Cottage</p> <p>e) d) Proposals must show how they utilise local history as a point of reference in the development of the scheme, for example drawing on the sites past associations with industrial water mills and the estate of Ravensbury Manor.</p> <p>Further guidance <u>Justification</u></p> <p>[Paragraphs 3.239 and 3.240 relocated and amended. Paragraphs 3.238, 3.242 and 3.250 amended and paragraph 3.241 deleted.]</p> <p>3.238 In line with Policy OEP1, townscape and landscape features should be used as a design framework in which to deliver the vision for Ravensbury, of building as part of a Suburban Parkland Setting. Within this framework proposals should create development that sits comfortably within, and is highly respectful to, its unique landscape <u>and heritage setting</u>, whilst making efficient use of the land. Proposals will be expected to demonstrate how they form an integral part of the landscape setting and retain this character through building forms, layouts, streets, use of landscaping and choice of materials. Integrating better to the wider setting is also important. How well proposals respond to these requirements will be a key means by which design quality is assessed.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>3.241 Proposals should investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.</p> <p>3.243 The townscape of the estate is somewhat secondary to the landscape. However, it does have the feel of a quiet and pleasant residential neighbourhood, as the housing on Morden Road prevents much of the traffic noise from penetrating within. The flats and housing to be retained are generally pleasant in appearance, though the larger block of flats suffers from a rather dead frontage due to a lack of entrances on the frontage.</p> <p>3.244 The Orlit houses fronting Morden Road provide a strong building edge to the estate, which helps define the character of Morden Road, and reinforces the curved shape of the road. This winding nature creates prominent points along the route defined by the corners and the buildings at them – such as the mill and pub. There is scope to improve the quality of these spaces, and better link the estate with its surroundings without compromising its quiet character.</p> <p>3.245 On Morden Road the entrance to Ravensbury Park is obscured from view and highlighting the park entrance will strengthen visual links into the park from the surrounding area.</p> <p>3.246 The architecture of the adjacent mill building provides inspiration for creative interpretation in the design of buildings at this prominent corner of the estate adjacent to Ravensbury Park. Cues should be used to inform the design of new homes whilst ensuring proposals integrate well into a high quality landscape setting.</p> <p>3.247 The Surrey Arms Public House and adjacent weather-boarded cottage are key elements in the surrounding townscape. Their location adjacent to Morden Hall Park entrance is a key focal point. Development proposals provide the opportunity to reinforce these key elements.</p> <p>3.248 Ravensbury Mill occupies a prominent location on the approach to the estate. Improving and enhancing the setting around the entrance to Ravensbury Park will help to highlight the Mill.</p> <p>3.249 Visibility into Morden Hall Park on Morden Road is poor due to the current boundary treatment. Regeneration of the estate provides an opportunity to work in conjunction with the National Trust to enable views from the estate into this high quality landscape. Replacing timber fences with railings and improvements to the park entrance could increase visibility and accessibility of the park whilst improving the</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>physical environment on Morden Road. Adding a new entrance opposite the Mill may also be a possibility.</p> <p>3.239 <u>Proposals should investigate the potential for working in conjunction with the National Trust concerning the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road.</u></p> <p>3.240 <u>Proposals should also investigate the potential for working in conjunction with the National Trust to strengthen the Wandle Trail and ensure there is a unified approach to surface finishes, boundary treatments and materials used along the Trail.</u></p> <p>3.250 <u>The remains of Ravensbury Manor are hidden from view amongst dense vegetation within Ravensbury Park. <u>Sensitively uncovering remnants of these ruins and providing interpretation would highlight the local history of the area and the park as part of the former estate of Ravensbury Manor and create a heritage focal point within the park. In this case, the advice of the Greater London Archaeological Advisory service should be sought.</u></u></p> <p>3.242 <u>Development proposals should consider alteration of the internal layouts of the ground floor flats to Ravensbury Court, to reorientate the front doors onto the pleasant open space in front of the block. Changes to the layout of the rear of these retained flats could also improve car parking and provide some private back gardens. At the time of the preparation of this plan, there are currently no proposals to refurbish Ravensbury Court that would require planning permission. Any future proposals to refurbish Ravensbury Court flats should be explored in partnership with residents. Subject to residents' views, these could consider providing doors to the living rooms of the ground floor flats to provide direct access from the open space on Ravensbury Grove. There is also scope to improve the space to the rear of the flats for the benefit of residents.</u></p>
MM22	EP R2 Street Network	Page 154	<p>a) The historic street of Ravensbury Grove must be retained as the main route into and out of the estate and the basis of an internal network of streets.</p> <p>b) Ravensbury Grove must be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.</p> <p>c) Hengelo Gardens must be retained and enhanced, particularly with respect to arrangement of car parking,</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>general landscaping and the potential for flood attenuation measures.</p> <p>d) <u>New proposals must include a network of streets that which should provide clear connections from between Ravensbury Grove to and Morden Road and views towards Ravensbury Park, provided that active frontages and other appropriate measures to deter crime and promote community safety are incorporated.</u></p> <p>Further guidance Justification</p> <p>[Paragraphs 2.351 - 3.256 relocated. Paragraph 3.257 added to paragraph 3.261]</p> <p>3.254 This policy section is about the creation of clearly defined and understood streets. It does not define vehicular movement. This is addressed by policy EP R3.</p> <p>3.255 The estate is physically isolated from its surroundings in a number of ways, including its street layout. There is only one access for vehicles into the estate and a minor cul-de-sac serving properties fronting Morden Road. The streets are set out in the form of a traditional cul-de-sac layout.</p> <p>3.256 Despite the relative isolation of the estate and its physical constraints of the river and park, there is significant potential to improve links towards Morden town centre, by opening up the frontage onto Morden Road via new street and footpath connections.</p> <p>3.251 <u>The estate is bounded by Morden Road, which is a busy traffic route. Targeted traffic management measures along Morden Road at key points should be considered to improve pedestrian connectivity to the surrounding area, reduce severance caused by traffic and improve road safety.</u></p> <p>3.252 <u>The access lane and parking for the houses fronting Morden Road should preferably be removed and used for tree planting and a new cycle route. This approach could also accommodate flood attenuation measures, such as a swale or uncovering of the historic watercourse. Some parking may be retained but should be better integrated into the layout.</u></p> <p>3.253 <u>New street network proposals should be well designed to provide clear connections that will reduce the current detached make-up of the estate, whilst ensuring that the estate does not become a through route for vehicular traffic from Morden Road. Any new East-West streets should form clear connections from</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<u>Ravensbury Grove to Morden Road with active frontages onto public space. A new access from Morden Road with flexibility for vehicular movement may also be considered, subject to an assessment of potential impacts.</u>
MM23	EP R3 Movement and access	Page 156	<p>a) Proposals must improve pedestrian routes across the estate and to nearby parks, bus and tram stops. Routes should be linked into the proposed/existing street network along active frontages or existing walking routes, which should be well surveyed <u>and designed so as to deter crime and promote community safety.</u> Entrances into the park must be carefully designed and located to ensure accessibility into the park without undermining safety and biodiversity.</p> <p>b) The relocation of the crossing point from Morden Hall Park to the estate to a position which allows for a direct link to the park and a new pedestrian and cycle route along Morden Road will be expected to be investigated. Proposals should create a clear legible route from Morden Hall Park to the entrance of Ravensbury Park. <u>Subject to detailed investigation, appropriate provision should be made for a clear, legible and safe pedestrian and cycle route between the entrances to Morden Hall Park and Ravensbury Park, including links into the Ravensbury estate and to the wider pedestrian and cycle networks. As part of such a proposal, the potential for a segregated cycle route along Morden Road, together with relocation of the crossing of Morden Road to a safe and convenient location, should also be investigated.</u></p> <p>c) Improvements to cycle links along Morden Road will be expected to be investigated in order to create stronger links between Morden Hall Park and Ravensbury Park. Proposals should investigate the creation of a segregated cycle way along Morden Road which feeds into Ravensbury Park from Morden Hall Park. Additions to the cycle network should be integrated into wider cycle network.</p> <p>d) c) The main route for vehicles into the estate is <u>Whilst Ravensbury Grove should remain the main vehicular access into the estate, proposals should take account of the potential</u> There is also scope to retain the existing slip road access off Morden Road as a secondary entrance into the site, should this be required further investigation reveal such a feature to be necessary and not harmful to road and community safety. Any new East-West links from the estate onto Morden Road must be clear and designed as traditional streets, irrespective of whether they are for vehicular use.</p> <p><u>Further guidance-Justification</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>[Paragraph 3.258 relocated and paragraphs 3.260, 3.261 and 3.266 amended]</p> <p>3.259 This policy section is about establishing the main vehicular movement strategy. This is different from the creation of streets, which may, or may not support through vehicular movement. Proposals for vehicular movement must be supported by appropriate traffic modelling and be in general compliance with relevant transport policies, whilst also aiming to achieve good vehicular permeability and convenience for residents.</p> <p>3.260 <u>Vehicular and cycle</u> parking on the estate will be provided in accordance with the London Plan (2016) parking standards taking into account specific local conditions and requirements. This should be supported by a Parking Management Strategy.</p> <p>3.261 Whilst the estate does have physical links to the surrounding area, they are generally poor and few in number. Morden Road is a busy road that creates severance between the two parks and the estate, as well as to the tram-stops to the north. <u>Proposals should consider introducing physical features at key focal points along Morden Road to better manage the speed and flow of traffic and to improve road safety.</u></p> <p><u>[New paragraph] To the south, the River Wandle presents a barrier to the residential area around The Drive. Whilst there is currently a footbridge, it is not conveniently located for north-south movement and is poorly overlooked. To enhance pedestrian links the opportunity to build a new bridge to create a new direct north-south pedestrian link from Wandle Road to the Ravensbury Estate could be investigated, taking account of the need to deter crime and promote community safety, particularly within the estate itself.</u></p> <p>3.262 There are two tram-stops a short walk away that provide frequent services between Wimbledon and Croydon town centres. Bus routes also pass close to the estate providing access to Morden town centre, connections with other bus routes and the London Underground Network.</p> <p>3.263 There is significant potential to improve direct links towards Morden by opening up the frontage onto Morden Road through new street and footpath connections. Proposals should create an easy to understand street layout for the estate including improved links to the Wandle Trail and Ravensbury Park supported by way-finding signage.</p> <p>3.264 Links from within the estate towards Morden consist of either a back alley or detour to the north. The pedestrian routes between the parks and cycling facilities on Morden Road are also unclear. The paths</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>through Ravensbury Park are poorly overlooked with few escape points into the surrounding street network. It is therefore easy to get lost or disorientated in the area.</p> <p>3.265 There is potential to improve movement and access around the estate in a way that is relatively low-key whilst retaining the quiet feel of the estate. The crossing from Morden Hall Park to the estate is a key link in the Wandle Trail in connecting Morden Hall Park to Ravensbury Park. There is scope to improve this crossing through enhancements to footways and crossing points which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment.</p> <p>3.266 The amount of traffic using Morden Road makes for an unfriendly environment for pedestrians and cyclists. Measures to better control traffic and improve pedestrian and cyclist safety could be achieved by a range of methods, including surface treatments, raised crossing points, cycle paths, width restriction or build outs and pedestrian refuges. The most appropriate measures should be investigated whilst ensuring the road blends into the area making it feel like a place rather than dominating the space. A new bridge across the river linking Ravensbury Grove to Wandle Road would improve pedestrian links to nearby tram stops and bus stops <u>but any such proposals must ensure community safety, particularly within the Ravensbury estate itself, is not compromised.</u></p> <p>3.258 <u>Developing cycle links further along Morden Road, for night time cycling when Morden Hall Park is less accessible, should be considered.</u></p>
MM24	EP R4 Land Use	Page 160	<p>a) The predominant land use for this estate is to be retained as residential with the re-provision of <u>the existing number of affordable homes and</u> the existing community room.</p> <p>b) Densities outputs should not be solely focused around figures, but must be assessed as a product of a range of relevant design, planning, social, environmental and management factors. Exceeding the current <u>London Plan</u> density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.</p> <p>Further guidance <u>Justification</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>[Paragraph 3.267 deleted, paragraph 3.269 amended]</p> <p>3.267 Applicants may propose other land uses, though these must be appropriate to the site and comply with local planning policies. However, it is considered unlikely there will be any demand for other non-residential uses.</p> <p>3.268 The estate is essentially wholly residential, with the exception of a small community room. There are some local shops nearby to the east on Morden Road, the Surrey Arms Public House opposite and the currently vacant mill. Morden town centre is a 15 minute walk away.</p> <p>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 improving the urban design quality of the estate. Development proposals must <u>should</u> accord with the London Plan density matrix and any other emerging or updated relevant policy requirements. <u>Ravensbury 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 1,400m walking distance (via Morden Road) from Morden Tube station, therefore being more than 800m from the nearest District Centre.</u> As outlined in the London Plan, the density matrix should be used flexibly and in conjunction with other development plan policy requirements.</p> <p>3.270 Proposals should also consider transport capacity, employment connectivity, the location and characteristics of the site and social infrastructure when determining an appropriate density. Development proposals should contribute to the delivery of a sustainable neighbourhood by building more and better quality homes and demonstrate how the density responds to the local context particularly in terms of design. Proposals should demonstrate graphically how density is sympathetic to the surrounding townscape and distributed in appropriate locations in a mix of buildings to deliver a variety of well-designed new homes and public spaces.</p> <p>3.274 The Council will aim to optimise the latest London Plan requirements. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>National, Local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents individual needs.</p> <p>3.272 In accordance with policy DM E4 (Local Employment Opportunities) major development proposals will be expected to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. Merton's Local Plan identifies a local deficiency in convenience retail provision to the east side of the estate. Any proposals for retail provision will need to accord with Merton's Local Plan policies including CS7 (Centres) and DM R2 (Development of town centre type uses outside town centres).</p>
MM25	EP R5 Open Space	Page 162	<p>a) The area of designated open space at the boundary with Ravensbury Park must be reprovided in terms of quantity and quality to a suitable location within the estate, with high quality landscaping and recreational uses.</p> <p>b) Proposals must retain and enhance the existing communal gardens on Hengelo Gardens and Ravensbury Grove. New landscaping should connect to, and complement these existing spaces.</p> <p>c) a) Suitably designed play space(s) for all age groups must be provided in accordance with have regard to the Mayor of London's 'Play and Informal Recreation' supplementary planning guidance document (2012).</p> <p>d) All new houses and flats must have gardens or amenity space that meet or exceed current space standards.</p> <p><u>b) Development proposals must be supported by an analysis of the current and future need for the provision of indoor and outdoor sports facilities in order to support the population arising from the proposals. Any proposals should have regard to Sport England's Planning for Sport Aims and Objectives to protect or relocate existing facilities, enhance the quality, accessibility and management of existing facilities and provide new facilities to meet demand.</u></p> <p><u>Further guidance Justification</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>[Paragraphs 3.273, 3.274 and 3.278 deleted, paragraph 3.277 amended]</p> <p>3.273 The number of open spaces and their individual size is not prescribed. Open space can be provided in the form of a single space or a number of smaller spaces. However, any new public open space should link into flood mitigation measures and the surrounding parkland landscape.</p> <p>3.274 The relatively small portion of designated open space adjacent to Ravensbury Park is of poor quality. The regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality.</p> <p>3.275 The estate is surrounded by high quality public open space in the form of Ravensbury Park and Morden Hall Park. There are also pleasant linear open spaces with mature trees on Ravensbury Grove and Hengelo Gardens. As such, the estate is not in an area deficient in access to public open space. Subject to meeting appropriate minimum standards concerning the provision of outdoor amenity space and play space, there is no requirement to provide additional public open space within the development.</p> <p>3.276 The surrounding open spaces are all important elements of the estate's high quality landscape character and setting. This needs to be carefully maintained and enhanced as part of any new development.</p> <p>3.277 There are potential opportunities for off-site play space enhancements that might address the need for certain age groups while there will also be a need for some on-site play space. Any proposal should clearly demonstrate how the play space needs of all the age groups will be provided for with reference to the guidance in the Mayor of London's 'Play and Informal Recreation' supplementary planning guidance document (2012). Development proposals must be in accordance with should have regard to para.74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>3.278 The provision of gardens that meet space standards increases their functionality, potential for tree planting and the promotion of biodiversity. In keeping with the vision for the new neighbourhood as part of a suburban parkland setting, front gardens or defensible space that allows for some planting, is also encouraged.</p> <p>[New paragraph] Development proposals should demonstrate the impact that they will have on the use of existing indoor and outdoor local sports facilities. The scope and methodology of the research will be</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>prescribed by Sport England and the local planning authority, during pre-application discussions. Any identified shortfall should be mitigated where appropriate through either a condition attached to a planning decision, a section 106 agreement or the Community Infrastructure Levy (CIL) as identified at the planning decision making stage. In accordance with the NPPF and the London Plan, Merton Council is committed to delivering a new playing pitch study in support of the planned borough-wide Local Plan.</u></p>
MM26	EP R6 Environmental protection	Page 164	<p>a) As the estate is in close proximity to the River Wandle and modelled is shown as being at high risk of fluvial flooding, development proposals will need to <u>be designed by applying a sequential approach to flood risk and include appropriate flood mitigation measures for the site in accordance with national, regional and local planning policies, to ensure the development is safe and does not increase the risk of flooding elsewhere.</u></p> <p>b) <u>In accordance with the London Plan policies 5.12 Flood Risk Management and 5.13 Sustainable Drainage and the supporting Design and Construction Supplementary Planning Guidance (SPG April 2014), the proposed development must aim to reduce post-development runoff rates as close to greenfield rates as reasonably possible practicable.</u></p> <p>c) Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan <u>policy 5.13 Sustainable Drainage</u> hierarchy as possible.</p> <p>d) Sustainable Drainage Systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following <u>multi-functional</u> benefits:</p> <ul style="list-style-type: none"> • Blends in and enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>e) The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>of the development <u>taking the latest climate change allowances into account</u>. Potential overland <u>fluvial and surface water</u> flow paths should be determined and appropriate solutions proposed to minimise the impact of the development, for example by configuring road and building layouts to preserve existing <u>fluvial and surface water</u> flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p> <p>g f) Proposals should seek to create mini corridors which enhance biodiversity of the estate and create a link between the estate and the surrounding parkland and river corridor habitats.</p> <p>h g) Development should not encroach on the river bank buffer zone, which should be managed for the enhancement of biodiversity along the river corridor and to allow maintenance access to the watercourse, where required.</p> <p>i-h) New development must ensure the preservation, protection and enhancement of protected species and habits within the adjacent Ravensbury Park and should demonstrate that the proposals would result in net biodiversity gains.</p> <p>j) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayors Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.</p> <p>k) i) When preparing development proposals in accordance with Policy 5.3: <u>Sustainable design and construction</u> of the London Plan, proposals should include suitable comparisons between existing and proposed developments <u>at each stage of the energy hierarchy</u> in order to fully demonstrate the expected improvements. All new developments proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure and sustainable procurement of materials.</p> <p>l) Technological improvements in battery storage have started to provide a potential energy storage solution suitable for use in connection to domestic solar PV systems. The use of on-site storage offers a potential</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>technological solution that would increase on-site renewable energy consumption, reduce utility costs and provide in-situ demand-side management. Battery storage can therefore be considered to sit within the 'be lean' or middle level of the energy hierarchy. Domestic PV installations should therefore not be considered without exploring the potential for on-site energy storage. Carbon savings from the incorporation of appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero.</p> <p><u>j) All domestic solar PV installations should be considered in conjunction with on-site battery storage.</u></p> <p>m) k) Applicants must demonstrate how their plans contribute to improving air quality and provide evidence to demonstrate that passive ventilation strategies employed to prevent overheating will not inadvertently expose residents to poor air quality or unacceptable levels of external noise.</p> <p>n) l) Development proposals must be accompanied by a working method statement and construction logistics plan framework that are appropriate and proportionate to the scale and nature of the proposal, whether outline or detailed, the sensitivity of the context and the types and severity of the anticipated impacts.</p> <p>o) m) Development proposals should demonstrate, by means of the submission of a site waste management plan, how they will apply the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location using the most appropriate means.</p> <p>Further guidance <u>Justification</u></p> <p>[Paragraphs 3.280, 3.281 and 3.282 relocated. Paragraphs 3.284, 3.279, 3.297, 3.299 and 3.300 amended]</p> <p>3.283 Being adjacent to the River Wandle, its tributaries and two large historic parks makes issues of enhancing the attractiveness of the river corridor and surrounds while managing flood risk, and improving biodiversity particularly relevant to any redevelopment of the estate. These features define the character of the estate and carry various designations and responsibilities that proposals must embrace, address successfully, and take as an opportunity to positively shape and improve the surrounding area.</p> <p>3.284 As already set out in national policy , the London Plan and Merton's adopted development plan,</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<ul style="list-style-type: none"> • Development proposals will need to include appropriate flood mitigation measures to ensure the development is safe and does not increase the risk of flooding both from and to the development. • Any development coming forward will be subject to a Sequential Test, Exception Test and site specific Flood Risk Assessment <u>and Drainage Strategy</u> to deal with all sources of flooding, which must have regard to Merton’s Strategic Flood Risk Assessment and Local Flood Risk Management Strategy. • Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk and following the sequential approach.. This includes careful consideration of where buildings should be located within the site. <p>3.285 As surface water flood risk and drainage have been identified as a key issue for Ravensbury, development proposals must demonstrate they have achieved greenfield run-off rates as reasonably possible, using Sustainable Drainage Systems (SuDS) and considering surface water management as high up the London Plan (policy 5.13) drainage hierarchy as reasonably possible.</p> <p>3.286 The interface between any proposed development and Ravensbury Park needs careful consideration, with particular reference to the habitats of the protected species within this area e.g. bats. This is a sensitive edge and a balance must be met between providing an active frontage onto the parkland whilst protecting the habitats of the park and surrounding vegetation.</p> <p>3.279 The landscape character of the estate is reinforced by the back channel tributary of the River Wandle. <u>There is scope, subject to feasibility study, including archaeological interest, to reinstate a historic river channel which runs alongside Morden Road, which could connect with the existing watercourses within Morden Hall Park.</u></p> <p>3.287 Reinstatement of a historic river channel running alongside Morden Road, would help to enhance the Wandle trail creating a stronger landscape link between Morden Hall Park and Ravensbury Park whilst improving the estates riverside setting, as well as contributing to flood mitigation measures.</p> <p>3.280 <u>Proposals should where possible enhance the outlook of the estate and improve the setting of the park whilst addressing biodiversity habitats.</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>3.281 <u>The landscape character of the estate is reinforced by the back channel tributary of the River Wandle, which runs along the southern boundary of the site. There is potential to enhance this, subject to Environment Agency (EA) flood defence consent, as this is a designated main river. Improvements should seek to improve surveillance and interface between the park, buildings and the water, as well as better management of habitats.</u></p> <p>3.282 <u>There is also potential to undertake in-channel and river bank enhancements to the main channel of the River Wandle to the south of the site within Ravensbury Park, providing this does not increase flood risk. Any such works will be subject to Environment Agency flood defence consent. This enhancement could involve the narrowing of the channel to increase the normal flow velocity, in order to help reduce siltation and stagnation in this stretch of the Wandle.</u></p> <p>3.288 Proposals are expected to be developed in consultation with relevant statutory and local interest groups such as the Environment Agency, the National Trust and the South East Rivers Trust (The Wandle Trust).</p> <p>3.289 Under the terms of the Water Resources Act 1991 and Thames Region Land Drainage Byelaws 1981, the Environment Agency requires flood defence consent for any works within 8m from the top of the bank of a main river and they therefore seek an 8m wide undeveloped buffer strip from the top of the river bank on main rivers. Merton seeks a similar 5m wide strip on either side of ordinary watercourses, where possible these distances should be exceeded.</p> <p>3.290 Of particular importance should be the enhancement of the river corridor and its environment, including dealing with flood risk and surface water drainage issues. Currently surface water drainage from Ravensbury discharges directly into the Thames Water sewer network, increasing the risk of the sewers being at or over capacity and surcharging during a flood event. The regeneration of this area presents an opportunity to manage this risk and to discharge to the River Wandle at a restricted rate.</p> <p>3.291 To improve surface water drainage and achieve as close to greenfield run-off rates as possible, there are a number of mitigation solutions which should be considered including an open network of swales, permeable paving surfaces, rain gardens, areas of landscaping, front and rear gardens.</p> <p>3.292 As set out in this policy, swales and other SuDS (such as rain gardens, green roofs, balancing ponds, filter strips and green verges) are designed holistically, as features to improve the attractiveness of the estate,</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>to enhance biodiversity, to provide recreation, to improve water quality as well as a drainage solution. Development proposals must demonstrate they have considered surface water management through sustainable urban drainage systems (SuDS) as high up the London Plan (policy 5.13) drainage hierarchy as possible.</p> <p>3.293 Developers are advised that tools such as the SuDS management train approach will assist with this process and with demonstrating that all of these issues have been considered. This approach will help create an attractive estate with the benefit of cost efficiencies.</p> <p>3.294 The Mayor of London’s Sustainable Drainage Action Plan (draft) and Sustainable Design and Construction supplementary planning guidance and the government’s National Standards for Sustainable Drainage set out the requirements for the design, construction operation and maintenance of SuDS.</p> <p>3.295 Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes. However, the measurement of local sustainability policies (CS15) and regional build developments are based on improvement that are also measured through Part L of the Building Regulations. While this information is useful to help measure performance, it does not make it easy to compare the energy performance of existing buildings with new buildings.</p> <p>3.296 Energy performance data on existing buildings will be held for many sites in the form of Energy Performance Certificates which measures the predicted energy consumption per m² in a development. By providing the energy performance data from Energy Performance Certificates, building energy performance can be compared between existing and future development using a metric that is suitable and easily comparable, thus helping to clearly demonstrate the potential for environmental improvements.</p> <p>3.297 The principles of sustainable design and construction are designed to be holistic and are more wide ranging than energy performance alone. Development proposals should demonstrate wherever possible <u>environmental improvements</u> using the comparison of quantifiable measures, <u>where possible, and qualitative appraisals, where appropriate</u>. In this way environmental improvements that will be delivered through regeneration should <u>can be easily</u> compared with the performance of existing buildings in an easily compared manner.</p> <p>3.298 Passive ventilation strategies cannot be considered in isolation of potentially negative external</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>environmental factors such as air quality or noise. Energy strategies that rely on passive ventilation should clearly demonstrate that occupants will not be adversely affected by air and noise pollution during periods of warmer weather</p> <p>3.299 Technological improvements in the field of energy storage have resulted in the improved feasibility of deploying battery storage in connection with domestic solar PV systems. and the <u>The</u> need to develop polices to support Innovative Energy Technologies <u>innovative approaches</u> is outlined in London Plan Policy 5.8: <u>Innovative energy technologies</u>. Battery storage can be utilised as a method of increasing on-site renewable energy consumption, <u>providing and provide</u> in-situ energy demand management to reduce pressure on the national grid during peak time, and increasing the efficiency of energy supply. In this way battery storage can be considered to be a ‘be clean’ measure within the Mayor’s <u>energy hierarchy</u>; <u>outlined in London Plan policy 5.2: Minimising carbon dioxide emissions</u>. The standard <u>Standard Assessment Procedure (SAP) approach for calculating the energy output from solar PV assumes a 20% reduction in PV output from distribution losses of the energy produced is lost through transmission</u> across the national electricity grid. Therefore, at present, there is no method of capturing these benefits of on-site energy storage within the Standard Assessment Procedure (SAP) or recognising the benefits of energy storage through the planning process. In order to recognise the benefits of on-site energy storage to residents and the grid operator the incorporation of appropriately sized solar PV systems should calculate solar output using the following equation, assuming the distribution losses are zero. <u>Energy strategies that utilise appropriately sized solar photovoltaics in tandem with on-site battery storage may account for the associated carbon benefits by recouping the 20% of solar photovoltaic output traditionally discounted under SAP as ‘distribution loss’.</u> <u>This additional carbon saving may be calculated using the below equation and then discounted from any carbon emissions shortfall for the wider development as a whole.</u></p> <p><u>Carbon savings from battery storage (kWh/year) = kWp x S x ZPV x 0.2</u></p> <p><u>Output of System (kWh/year) = kWp x S x ZPV</u></p> <p>kWp – Kilowatt Peak (Size of PV System)</p> <p>S – Annual Solar Radiation kWh/m2 (See SAP)</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>ZPV – Overshading Factor (See SAP)</p> <p>3.300 Consultation responses from people living within and near Ravensbury have raised concerns about the potential for disruption and disturbance caused by building works taking place in phases over a long period of time. <u>Proposals must comply with Policy DM.D2 (xiii) ensuring that traffic and construction activity do not adversely impact or cause inconvenience in the day to day lives of those living and working nearby and do not harm road safety or significantly increase traffic congestion.</u> As with other planning applications, the council will require the submission of a working method statement and a construction logistics plan <u>framework and a site waste management plan</u> prior to development proposal commencement. <u>These must be appropriate and proportionate to the scale and nature of the development proposal, whether outline or detailed, the sensitivity of the context and the types and severity of the anticipated impacts.</u> Working method statements must ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and comply with London Plan (2016) policies 6.3 and 6.14, Merton’s Core Strategy policy CS20 and policy DM T2 of Merton’s Sites and Policies Plan (2014). Construction logistics plans <u>frameworks</u> must demonstrate how environmental impacts of the development on the local environment, including the surrounding highway network and the amenities of the surrounding occupiers will be minimised. These must also accord with guidance published by the mayor of London / TfL and London Plan (2016) policies including 7.14 and 7.15. <u>In accordance with policy DM.D2(xii), construction waste must be minimised on site by managing each type of construction waste as high up the waste hierarchy as practically possible.</u> These provisions are particularly important to help identify and minimise the causes of potential disruption to residents at Ravensbury Court while the wider estate regeneration programme is being delivered.</p>
MM27	EP R7 Landscap e	Page 170	<p>a) Landscaping must be a prominent feature within the public realm and create strong links to the surrounding parkland context. Landscaping treatments should emphasize green links and the river crossing.</p> <p>b) The estate currently has groups of established mature trees to the north, along Morden Road, on Ravensbury Grove and Hengelo Gardens <u>These trees must be retained and be used to inform the design of landscape arrangements, for example to provide cues for the location of focal points.</u> <u>Proposals must retain and enhance the existing communal gardens on Hengelo Gardens and Ravensbury Grove.</u> New landscaping</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>should connect to, and complement these existing spaces.</u></p> <p>c) Street tree planting and landscaping must be incorporated into streets whilst integrating with existing open space functionality, biodiversity enhancements and flood mitigation measures.</p> <p>d) <u>Any proposals should retain established mature trees to inform the design of landscaping arrangements</u> Along Morden Road tree planting must be extended to wrap around the perimeter of the estate following the curvature of the road Tree species <u>for proposed new trees</u>, should be specified to mitigate against pollution and noise.</p> <p>e) <u>Proposals must ensure appropriate provision of private gardens or amenity space to all new dwellings (houses and flats), having regard to relevant standards and the character of the development</u></p> <p>e) f) The significant widening and enhancement of the entrance to Ravensbury Park from Morden Road, will be expected to be an integral part of any development proposals for the site.</p> <p>Further guidance-Justification</p> <p>[Paragraph 3.301 relocated and paragraph 3.303 amended]</p> <p>3.302 The estate is defined and characterised by the landscape setting of the two parks and River Wandle. This is an essential element of its character that should not be lost. However, there are various opportunities to maintain and enhance this character whilst still increasing density and building height.</p> <p>3.303 Large and well vegetated gardens also contribute to the estate’s landscape character and redevelopment proposals need to be designed to maintain opportunities for such incidental greenery throughout. The estate’s relative isolation is also an element of its character. This needs to be balanced with the need and opportunity to increase accessibility to and along the river, to the tram-stops to the north, to local bus stops and into Morden.</p> <p>[New paragraph] <u>The estate currently has groups of established mature trees to the north, along Morden Road, on Ravensbury Grove and Hengelo Gardens. These trees could be used to provide the design cues for the location of focal points. Along Morden Road tree planting must be extended to wrap around the perimeter</u></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><u>of the estate following the curvature of the road. Merton's Sites and Policies Plan Policy DM.O2 (b) to (f) sets out the council's policy on the retention, replacement and potential removal of trees and landscape features.</u></p> <p>[New paragraph] <u>The relevant standards for gardens and private amenity space are set in Merton's Sites and Policies Plan DM.D2 and the Mayor of London's housing supplementary planning guidance. Gardens should be provided as a single, usable, regular shaped space.</u></p> <p>3.304 Currently, pedestrian gateways into Ravensbury Park are hidden from view and have limited overlooking which could be resolved by significant widening and enhancement of the entrance to the park off Morden Road.</p> <p>3.305 The skyline around the estate is enveloped by large mature trees and this is a key characteristic of the estate. Additional tree planting will bolster the landscape character of the area and can create a landscape buffer between new development and traffic on Morden Road.</p> <p>3.306 The Wandle Trail is interrupted by Morden Road and the narrowing of Ravensbury Park. There is scope to strengthen the green corridor link between Morden Hall Park and Ravensbury Park through the use of landscape features such as tree planting on Morden Road. This would also help to improve the continuity of the Wandle Trail and improve accessibility into the park.</p> <p><u>3.304</u> <u>Landscaping measures should be designed to improve the green corridor link between Ravensbury Park and Morden Hall Park.</u></p>
MM28	EP R8 Building heights	Page 172	<p>a) General building heights</p> <p>Whilst there is a need to increase density, to do so too much would undermine the dominant landscape character of the area. To ensure that open views to the surrounding trees are retained and the parkland setting of the estate is maintained buildings heights must not extend higher than the existing Ravensbury Court flats or compete with established mature trees which envelop the estate. Relatively open views from within the estate to the surrounding tree canopy are a defining characteristic of the estate and should generally be retained.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>To ensure this, no buildings must extend higher than the existing Ravensbury Court flats. Building heights must be based on a comprehensive townscape appraisal and visual assessment which builds on the analysis included in this document. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area. Building heights must be based on informed by a comprehensive townscape appraisal and visual assessment which builds on the analysis included in this document council's Estates Local Plan analysis. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area</p> <p>b) Core of the estate: Within the estate, building heights must generally be lower than other parts of the estate around its edge. Heights should allow views to the surrounding established trees. Buildings around the edge of the estate fronting Morden Road along Ravensbury Grove and on Ravensbury Garages should be higher than the middle of the estate.</p> <p>c) Buildings heights within the middle of the estate must generally be lower than around the edges Morden Road: Buildings along Morden Road must relate to the surrounding established tree canopy but not adversely affect views of it from the centre of the estate. Buildings here can be higher than the middle of the estate.</p> <p>d) Ravensbury Grove: Building heights along Ravensbury Grove must relate to the character and scale of existing buildings such as Ravensbury Court and the established trees.</p> <p>e) Ravensbury Garages: Building heights in the vicinity of Ravensbury garages must relate to the surrounding established tree canopy and to the scale of adjacent existing buildings.</p> <p>Further guidance <u>Justification</u></p> <p>[Paragraphs 3.307, 3.308 and 3.309 relocated]</p> <p>3.310 All existing buildings are two storeys with the exception of the one larger four-storey block, Ravensbury Court. This low rise form is what allows views to the tree-line visible around the estate from numerous locations, which is one of the defining characteristics of the estate's setting. The low-rise buildings also define the estate as a suburban place, although it is considered there is more scope to sensitively increase heights to create more homes so long as views to the trees which envelop the site are not obstructed and the</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>landscape character of the overall estate remains strong.</p> <p>3.307 <u>Housing types, whether houses or flats, should preserve the landscape character of the estate.</u></p> <p>3.308 <u>Where landscaping features allow, the creation of wider streets with width to height street proportions which enable wider and longer views should be considered.</u></p> <p>3.309 <u>Redevelopment proposals should give very careful consideration as to the site layout, landscaping, building heights and street widths to ensure the unique landscape character of the estate is retained. Any proposals to increase density should demonstrate how this will not result in undermining this character.</u></p> <p><u>[New paragraph] The application of policy on building heights can consider flood risk management requirements as part of the comprehensive townscape appraisal and visual assessment used to inform these proposals. However the additional height needed to address flood risk matters (e.g. raised finished floor levels) is likely to be no more than 0.5m and localised to the centre of the site. Therefore this should not adversely affect the ability to ensure open views to the surrounding trees are retained and the parkland setting of the estate is maintained.</u></p>
MM29	EP Part 4 Design Requirem ent for Planning application	Page 174	<p>Part 4 title revised to: Design requirements for planning applications <u>Information to support planning application submissions</u></p> <p>4.1 This part of the Plan identifies aspects of design that the Council considers particularly relevant to the successful and long-lasting regeneration of the 3 estates. It gives detailed guidance to applicants on aspects of design that they will be expected to focus on in more detail to demonstrate that the Vision, Urban Design Principles and Site-Specific Policies of the Plan can be delivered. Good urban design is inherently sustainable, and the aim of the design requirements <u>guidance</u> is to deliver estates that are underpinned by good urban design principles. Examples of good design include:</p> <ul style="list-style-type: none"> • Streets designed from the outset to carry out a number of functions; • Permeable, legible street layouts, which create walkable environments that enable sustainable modes of

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>transport such as walking and cycling;</p> <ul style="list-style-type: none"> • Flood mitigation and drainage measures integrated into street design. <p>These measures will help establish a long-lasting and resilient estate.</p> <p>4.2 At the outline planning application stage and as part of their masterplans, the applicant, will be expected to include as part of their application, detailed proposals for each estate on how these particular aspects of design will be addressed, based on the guidance set out in this section. This should include, but not necessarily be limited to, the specific subject areas outlined below. The following guidance lists the subject areas that must be covered to enable the delivery of the 8 policy areas for each respective estate and gives guidance on how these subjects will be expected to be addressed.</p> <p>4.3 In developing this guidance applicants should consult with residents to ensure they have a say in how their neighbourhood will be developed and help to maintain and enhance community spirit.</p> <p>4.4 Notwithstanding the requirements of the council's validation checklist the applicant will be required to provide information to address the following: <u>Applicants should provide the following information to support their planning applications within the appropriate documents required by the council's validation checklist (e.g. Design and Access Statement; Planning Statement etc.).</u></p> <p>Architecture and elevations</p> <p>4.5 <i>Set out the approach intended to guide architectural style and the design of building elevations.</i> A general approach to architectural style should be defined which allows different phases of development to have their own character. This is important in order to prevent a monotonous urban form and character. This requires setting out some common rules and this could be in the form of a more formal design code.</p> <p>4.6 The guidance should include palette of common characteristics in basic architectural features, such as materials, height and proportions, yet allows scope for individual creativity for each building and phase. This should also contain specific guidance on the appearance of elevations, notably to ensure they contain sufficient three-dimensional depth, human scale detail, visual interest and that sufficient attention to detail is</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>given to the design of windows, their materials, proportions and depth of reveals.</p> <p>Materials</p> <p><i>4.7 Define a general palette of materials and where they should be used on the estate and on buildings. This should build on the guidance for architecture and elevations and support the visions for each estate that are complementary to their context. Criteria for the selection of building materials and components should also include a life cycle assessment and the environmental performance of materials and components, the aim being to select materials which reduce the environmental impact of the buildings and hard landscaping.</i></p> <p>Landscape and biodiversity</p> <p><i>4.8 Set out the landscaping principles and strategy for each estate. This should build on the existing landscape characteristics of each site and detailed policy guidance indicatively, specifying planting types and species and locations. It should make reference to tree surveys of the sites and provide guidance and reasoning on their protection and integration into the new estate layout.</i></p> <p><u>[New paragraph] <i>Impact of development on Wimbledon Common and Richmond Park Special Areas of Conservation (SAC). Development proposals that are likely to have a significant effect upon Wimbledon Common or Richmond Park Special Areas of Conservation are required to submit an appropriate assessment under the European Union’s Habitats Directive (92/43/ EEC). As prescribed in the Habitats Regulations Assessment for the Estates Local Plan (2016) the applicant should agree the scope and methodology of the assessment with Natural England and Merton Council. The assessment should address what potential impacts the proposal could have on a SAC, identify how any impacts can be avoided, minimised or mitigated and if the proposal will have a significant impact on the ‘site integrity’ of the SAC. The assessment should assess how the proposal meets Policy 7.19 Biodiversity and Access to Nature of the London Plan (2016), Policy CS13 Open Space, Nature Conservation, Leisure and Culture of the London Borough of Merton Core Strategy (2011) and policy DM 02 Nature Conservation, Trees, Hedges and Landscape Features of the London Borough of Merton Sites and Policies Plan (2014).</i></u></p> <p>Climate change and energy performance</p> <p><i>4.9 Clearly set out and energy strategy for each site that demonstrates the environmental improvements</i></p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p><i>achieved at each level of the Mayor's Energy Hierarchy.</i> In support of the case for regeneration the energy strategy for each estate must clearly demonstrate that developments have achieved significant environmental performance compared to existing dwellings at each site using easily comparable metrics such as energy performance (w/m2). Wherever possible available quantifiable and qualitative data comparisons should be presented.</p> <p>Flooding and drainage</p> <p>4.10 <i>Set out a strategy and plans for flood mitigation and drainage measures for all estates.</i> Based upon the findings of any required flood risk assessments, methods of mitigation should be detailed along with their location and extent where relevant.</p> <p>Internal space standards</p> <p>4.11 <i>Set out principles for adhering to National Planning Policy, London Plan and the Mayor's Housing SPG requirements on residential internal space standards.</i> The philosophy should be to design beyond the minimum space standards, not to them. The London Housing Design Guide should be used as a benchmark for good internal design standards.</p> <p>Building and dwelling layouts</p> <p>4.12 <i>Set out principles for building layouts.</i> This should include defining guidelines for the design and location of entrances, stair cores, refuse storage and in-building cycle storage. This should also address issues such as dual aspect and flexibility of living spaces. Example dwelling layouts should be shown that demonstrate how rooms use space efficiently by using regular plan forms and allow for different arrangements of furniture. Awkward shaped rooms and wasted space due to poorly positioned doors and windows for example, should be avoided.</p> <p>Cycle Parking</p> <p>4.13 <i>Set out principles for the good design and location for cycle parking.</i> Cycle parking must be well located, convenient and easy to use if people are to be encouraged to cycle. Parking should be integral to buildings and secure. It should be based on good practice as set out in TfL and Cambridge City Council guidance on</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>cycle parking design.</p> <p>Building to street interface</p> <p>4.14 <i>Set out principles of how buildings meet streets to manage the transition from the private to the public realm.</i> This should give clear guidance on how to create a transition zone between public and private space by the creation of ‘defensible space’, how natural surveillance will be created by maximising front doors and habitable rooms at ground floor level. This should also include reference to the design, size and content of defensible space, such as its use for bin and cycle stores, planting and personalisation. This should also include how digital services will be provided, identifying locations for communal TV aerials and satellite dishes. Individual dishes will not be permitted on elevations facing the street as they have a negative visual impact on the street scene.</p> <p>Street design characteristics</p> <p>4.15 <i>Set out principles for the design of streets.</i> This should define different street types and set out how space will be used. This should include all space between building elevations and be based on the creation of traditional, recognised street forms as linear public spaces. The provision of on-street parking should be promoted as the first-choice means of provision. It must be shown how parking will integrate with street trees, street furniture and on-kerb parking will be avoided.</p> <p>4.16 For example parked cars could be interspersed with build-outs with trees where appropriate. Build-outs also enable additional crossing points and space for landscaping on a street. A palette of surface materials and street furniture should be developed <u>that is well considered and well laid out to minimise street clutter, and includes</u> landscaping guidance. Guidance must ensure the creation of liveable, attractive streets by having street width to building height ratios that ensure taller buildings do not create oppressive environments at ground level.</p> <p>4.17 Building proportions as well as height need careful consideration. Traffic management measures must be in-built into the overall street design and not appear retrofit or distort or undermine the overall character of the street as a linear space with a movement function.</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>Amenity space</p> <p>4.18 <i>Set out how all amenity space is to be provided.</i> This must include adherence have regard to existing relevant standards. This should cover front and rear gardens to houses, communal and private space for flats, frontage landscaping or front gardens for blocks of flats and public open space. There should also be qualitative guidance relating to issues such as shape, usability, microclimate, sunlight/daylight, general outlook and issues of privacy and security.</p> <p>Refuse storage and collection</p> <p>4.19 <i>Identify a strategy for the design and operation of refuse storage and collection. <u>All proposals for refuse stores must ensure they are convenient for residents and for collection, and accord with the Council's guidelines on this. Flats should have communal bin stores that are well integrated into their building. Houses must have individual bin-stores within the property boundary of each dwelling that are well designed and integrated into the front defensible space. Bin stores for houses should not form part of a communal system. The council may also consider alternative refuse collection methods, such as subterranean street-based refuse bins. Such systems must be convenient for residents and collection as well as being seamlessly and unobtrusively integrated into the townscape.</u></i></p> <p>Servicing and deliveries</p> <p>4.20 <i>Develop a strategy for the management of servicing and deliveries.</i> Increased density combined with evolving retail trends will create an increased level of demand for servicing and deliveries. Proposals should investigate a range of traditional and innovative methods of addressing and managing servicing needs that aim to minimise trip generation and parking requirements</p> <p>Maintenance and management</p> <p>4.24 <i>Develop a strategy for the management and maintenance of communal spaces.</i> Well maintained communal spaces particularly green open spaces create a sense of community and wellbeing. Ongoing maintenance of internal and external communal spaces should inform the design of places, space should be designed from the outset to minimise the need for maintenance however not to the detriment of design quality. Shared or communal areas must have robust management structures that deliver a secure,</p>

Mod ref July 2017	Policy / Paragrap h (SD.1)	Page	Amendment proposed by the council
			<p>supportive and safe environment and provide for management and maintenance activities including the cleaning of common parts, maintenance of lifts, upkeep of soft and hard landscaping, management of parking to favour residents.</p> <p>4.22 The strategy should clearly set out how maintenance will be funded taking into consideration a fair and reasonable service charge. Maintenance of the public realm should include strategies for hard and soft landscape features, green open space, trees, play areas and sports facilities where applicable. The strategy should address resident’s responses to the Estates Local Plan consultation in which they asked about how the estate would be managed in future with particular emphasis on the maintenance of streets and the management of car parking to ensure dedicated parking spaces for residents’ use.</p>

APPENDIX 4: Statutory development Plan policies relevant to each ELP policy

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
	<u>OEP1 - Vision</u>	<u>1.1 - Delivering the strategic vision and objectives for London</u> <u>2.3 - Growth areas and co-ordination corridors</u> <u>2.5 - Sub-regions</u> <u>2.6 - Outer London: Vision and strategy</u> <u>3.1 - Ensuring equal life chances for all</u> <u>3.5 - Quality and design of housing developments</u>	<u>1.1 Delivering the strategic vision and objectives for London</u> <u>2.3 - Growth areas and co-ordination corridors</u> <u>2.5 - Sub-regions</u> <u>3.5 - Quality and design of housing developments</u>	
	<u>OEP2 - Strategy</u>	<u>1.1 - Delivering the strategic vision and objectives for London</u> <u>2.3 - Growth areas and co-ordination corridors</u> <u>2.5 - Sub-regions</u> <u>2.6 - Outer London: Vision and Strategy</u> <u>2.8 - Outer London: Transport</u> <u>3.1 - Ensuring equal life chances for all</u> <u>3.2 - Improving health and addressing health inequalities</u> <u>3.3 - Increasing housing supply</u> <u>3.4 - Optimising housing potential</u> <u>3.5 - Quality and design of housing developments</u>	<u>CS9 - Housing Provision</u> <u>CS11 - Infrastructure</u>	
	<u>OEP3 - Urban design</u>	<u>1.1 - Delivering the strategic vision and objectives for London</u> <u>2.3 - Growth areas and co-ordination</u>	<u>CS14 - Design</u>	<u>DM D1 – Urban Design and Public Realm</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
	<u>principles</u>	<u>corridors</u> <u>2.5 - Sub-regions</u> <u>3.5 - Quality and design of housing developments</u> <u>7.2 – An Inclusive Environment</u> <u>7.8 – Heritage assets and Archaeology</u>		<u>DM D4 – Managing Heritage Assets</u>
	<u>Eastfields General</u>		<u>CS2 - Mitcham Sub Area</u>	<u>DM H2 - Housing Mix</u> <u>DM H3 - Support for Affordable Housing</u> <u>DM H1 - Supported Care Housing For Vulnerable People or Secure Residential Institutions For People Housed As Part Of The Criminal Justice System.</u>
	<u>EP E1 Townscape</u>	<u>3.5 - Quality and Design of Housing Developments</u> <u>3.7 - Large Residential Developments</u>		
	<u>EP E2 Street Network</u>	<u>6.9 - Cycling</u> <u>6.10 - Walking</u> <u>6.12 - Road Network</u> <u>6.13 - Parking</u>		
	<u>EP E3 Movement and Access</u>	<u>2.8 - Outer London: Transport</u> <u>6.3 - Assessing Effects of Development on Transport Capacity</u> <u>6.9 - Cycling</u> <u>6.10 - Walking</u> <u>6.12 - Road Network Capacity</u> <u>6.13 - Parking</u> <u>7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting</u>	<u>CS18 - Active Transport</u> <u>CS19 - Public Transport</u> <u>CS20 - Parking Servicing and Delivery</u>	<u>DM T1 - Support for Sustainable Transport and Active Travel</u> <u>DM T2 - Transport Impacts of Development</u> <u>DM T3 - Car Parking and Servicing Standards</u> <u>DM T4 - Transport Infrastructure</u> <u>DM T5 - Access to the Road Network</u> <u>DM EP2 - Reducing and Mitigating Noise</u> <u>DM EP4 - Pollutants Transport</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>Soundscapes</u>		<u>Proposals - 01TN, 22TN and 18TN</u>
	<u>EP E4 Land Use</u>	<u>3.3 - Increasing Housing Supply</u> <u>3.4 - Optimising Housing Potential</u> <u>3.5 - Quality and Design of Housing Developments</u> <u>3.7 - Large Residential Developments</u> <u>3.8 - Housing Choice</u> <u>3.10 - Definition of Affordable Housing</u> <u>3.11 - Affordable Housing Targets</u> <u>3.12 - Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes</u> <u>3.13 - Affordable Housing Thresholds</u> <u>3.14 - Existing Housing</u> <u>3.15 - Coordination of Housing Development and Investment</u> <u>Housing SPG (2016)</u> <u>Affordable Housing and Viability (2016)</u> <u>Character and Context SPG (2014)</u>	<u>CS2 - Mitcham Sub Area</u> <u>CS8 - Housing Choice</u> <u>CS9 - Housing Provision</u> <u>CS14 - Design</u>	
	<u>EP E5 Open Space</u>	<u>3.2 - Improving Health and Addressing Health Inequalities</u> <u>3.6 - Children and Young Peoples Plan and Informal Recreation Facilities</u> <u>3.9 - Mixed and Balanced Communities</u> <u>3.16 - Protection and Enhancement of Social Infrastructure</u> <u>3.17 - Health and Social Care Facilities</u> <u>3.18 - Educational Facilities</u> <u>3.19 - Sports Facilities</u> <u>5.10 - Urban Greening Policy</u>	<u>CS11 - Infrastructure</u> <u>CS13 - Open Space, Nature Conservation, Leisure and Culture</u>	<u>DM O1 - Open Space</u> <u>DM O2 - Nature Conservation and Leisure</u> <u>DM C1 - Community Facilities</u> <u>DM C2 - Education for Children and Young People</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>7.17 - Metropolitan Open Land</u> <u>7.18 - Protecting Open Space and Addressing Deficiency</u> <u>7.19 - Biodiversity and Access to Nature</u> <u>Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)</u>		
	<u>EP E6</u> <u>Environmen</u> <u>tal</u> <u>Protection</u>	<u>5.1 - Climate Change Mitigation</u> <u>5.2 - Minimising Carbon Dioxide Emissions</u> <u>5.3 - Sustainable Design and Construction</u> <u>5.6 - Decentralised Energy in Development Proposals</u> <u>5.7 - Renewable Energy</u> <u>5.9 - Overheating and Cooling</u> <u>5.11- Green Roofs and Development Site Environs</u> <u>5.12 - Flood Risk Management</u> <u>5.13 - Sustainable Drainage</u> <u>5.14 - Water Quality and Wastewater Infrastructure</u> <u>5.15 - Water Use and Supplies</u> <u>5.18 - Construction, Excavation and Demolition Waste</u> <u>5.21 - Land Contamination</u> <u>7.14 - Improving Air Quality</u> <u>7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes</u> <u>Sustainable Design and Construction SPG (2014)</u>	<u>CS11 - Infrastructure Policy</u> <u>CS15 - Climate Change</u> <u>CS16 - Flood Risk Management</u> <u>CS17 - Waste Management</u>	<u>DM EP1 - Opportunities for Decentralised Energy Networks</u> <u>DM H4 - Demolition and Redevelopment of a Single Dwelling House</u> <u>DM F1 - Support for Flood Risk Management</u> <u>DM F2 - Sustainable Urban Drainage Systems (SUDS) and Wastewater and Water Infrastructure</u> <u>DM EP2 - Reducing Mitigating Against Noise</u> <u>DM EP3 - Allowable Solutions</u> <u>DM EP4 - Pollutants (Air, Land, Contamination, Water)</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
	<u>EP E7 Landscape</u>	<u>5.10 - Urban Greening Policy</u> <u>7.5 - Public Realm</u> <u>7.8 - Heritage Assets and Archaeology</u>		
	<u>EP E8 Building Heights</u>	<u>7.1 - Lifetime Neighbourhoods</u> <u>7.2 - An Inclusive Environment</u> <u>7.3 - Designing Out Crime</u> <u>7.6 - Architecture</u> <u>7.7 - Location and Design of Tall and Large Development</u> <u>7.8 - Heritage Assets and Archaeology</u> <u>7.13 - Safety, Security and Resilience to Emergency</u> <u>London Plan Table 3.2 Density and Table 3.3 Housing Standards Interim</u> <u>London Housing Design Guide (2010)</u> <u>Housing SPG (2016)</u>	<u>CS14 - Design</u>	<u>DM D1 - Urban Design and Public Realm</u> <u>DM D2 - Design Considerations in All Developments</u> <u>DM D3 - Alterations to Existing Buildings</u> <u>DM D4 - Managing Heritage Assets</u> <u>DM D7 - Shop Front Design and Signage</u>
	<u>High Path General</u>	<u>2.6 - Outer London Vision and Strategy</u> <u>2.13 - Opportunity Areas and Intensification Areas.</u> <u>Town Centres (SPG 2014)</u> <u>South Wimbledon/ Colliers Wood designated in London Plan as an AFI</u>	<u>CS1 - Colliers Wood / South Wimbledon Sub Area</u>	
	<u>EP H1 Townscape</u>	<u>3.5 - Quality and Design of Housing Developments</u>	<u>CS1 - Colliers Wood / South Wimbledon Sub Area</u>	

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>3.7 - Large Residential Developments</u>		
	<u>EP H2 Street Network</u>	6.9 - <u>Cycling</u> 6.10 - <u>Walking</u> 6.12 - <u>Road Network</u> 6.13 - <u>Parking</u>		
	<u>EP H3 Movement and Access</u>	2.8 - <u>Outer London: Transport</u> 6.3 - <u>Assessing Effects of Development on Transport Capacity</u> 6.9 - <u>Cycling</u> 6.10 - <u>Walking</u> 6.13 - <u>Parking</u> 6.12 - <u>Road Network Capacity</u> 7.15 - <u>Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Soundscapes</u>	CS18 - <u>Active Transport</u> CS19 - <u>Public Transport</u> CS20 - <u>Parking Servicing and Delivery</u>	<u>DM T1 - Support for Sustainable Transport and Active Travel</u> <u>DM T2 - Transport Impacts of Development</u> <u>DM T3 - Car Parking and Servicing Standards</u> <u>DM T4 - Transport Infrastructure</u> <u>DM T5 - Access to the Road Network</u> <u>DM EP2 - Reducing and Mitigating Noise</u> <u>DM EP4 - Pollutants Transport Proposals - 01TN, 22TN and 18TN</u>
	<u>EP H4 Land Use</u>	3.3 - <u>Increasing Housing Supply</u> 3.4 - <u>Optimising Housing Potential</u> 3.5 - <u>Quality and Design of Housing Developments</u> 3.7 - <u>Large Residential Developments</u> 3.8 - <u>Housing Choice</u> 3.10 - <u>Definition of Affordable Housing</u> 3.11 - <u>Affordable Housing Targets</u> 3.12 - <u>Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes</u> 3.13 - <u>Affordable Housing Thresholds</u> 3.14 - <u>Existing Housing</u> 3.15 - <u>Coordination of Housing Development and Investment</u> Housing SPG (2016)	CS2 - <u>Mitcham Sub Area</u> CS8 - <u>Housing Choice</u> CS9 - <u>Housing Provision</u> CS14 - <u>Design</u>	

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>Affordable Housing and Viability (2016)</u> <u>Character and Context SPG (2014)</u>		
	<u>EP H5 Open Space</u>	<u>3.2 - Improving Health and Addressing Health Inequalities</u> <u>3.6 - Children and Young Peoples Plan and Informal Recreation Facilities</u> <u>3.9 - Mixed and Balanced Communities</u> <u>3.16 - Protection and Enhancement of Social Infrastructure</u> <u>3.17 - Health and Social Care Facilities</u> <u>3.18 - Educational Facilities</u> <u>3.19 - Sports Facilities</u> <u>5.10 - Urban Greening Policy</u> <u>7.17 - Metropolitan Open Land</u> <u>7.18 - Protecting Open Space and Addressing Deficiency</u> <u>7.19 - Biodiversity and Access to Nature</u> <u>Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)</u>	<u>CS11 - Infrastructure Policies</u> <u>CS13 - Open Space, Nature Conservation, Leisure and Culture</u>	<u>DM O1 - Open Space</u> <u>DM O2 - Nature Conservation and Leisure</u> <u>DM C1 - Community Facilities</u> <u>DM C2 - Education for Children and Young People</u>
	<u>EP H6 Environmental Protection</u>	<u>5.1 - Climate Change Mitigation</u> <u>5.2 - Minimising Carbon Dioxide Emissions</u> <u>5.3 - Sustainable Design and Construction</u> <u>5.6 - Decentralised Energy in Development Proposals</u> <u>5.7 - Renewable Energy</u> <u>5.9 - Overheating and Cooling</u> <u>5.11 - Green Roofs and Development Site Environs</u>	<u>CS11 - Infrastructure Policy</u> <u>CS15 - Climate Change</u> <u>CS16 - Flood Risk Management</u> <u>CS17 - Waste Management</u>	<u>DM EP1 - Opportunities for Decentralised Energy Networks</u> <u>DM EP2 - Reducing and Mitigating Noise</u> <u>DM EP3 - Allowable Solutions</u> <u>DM EP4 - Pollutants (Air, Land, Contamination, Water)</u> <u>DM H4 - Demolition and Redevelopment of a Single Dwelling House</u> <u>DM F1 - Support for Flood Risk</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>5.12 - Flood Risk Management</u> <u>5.13 - Sustainable Drainage</u> <u>5.14 - Water Quality and Wastewater Infrastructure</u> <u>5.15 - Water Use and Supplies</u> <u>5.18 - Construction, Excavation and Demolition Waste</u> <u>5.21 - Land Contamination</u> <u>7.14 - Improving Air Quality</u> <u>7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes</u> <u>Sustainable Design and Construction SPG (2014)</u>		<u>Management</u> <u>DM F2 - Sustainable Urban Drainage Systems (SUDS) and Wastewater and Water Infrastructure</u>
	<u>EP H7 Landscape</u>	<u>5.10 - Urban Greening Policy</u> <u>7.5 - Public Realm</u> <u>7.8 - Heritage Assets and Archaeology</u>		
	<u>EP H8 Building Heights</u>	<u>7.1 - Lifetime Neighbourhoods</u> <u>7.2 - An Inclusive Environment</u> <u>7.3 - Designing Out Crime</u> <u>7.6 - Architecture</u> <u>7.7 - Location and Design of Tall and Large Development</u> <u>7.8 - Heritage Assets and Archaeology</u> <u>7.13 - Safety, Security and Resilience to Emergency.</u> <u>London Plan Table 3.2 Density and</u>	<u>CS14 - Design</u>	<u>DM D1 - Urban Design and Public Realm</u> <u>DM D2 - Design Considerations in All Developments</u> <u>DM D3 - Alterations to Existing Buildings</u> <u>DM D4 - Managing Heritage Assets</u> <u>DM D7 - Shop Front Design and Signage</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>Table 3.3 Housing Standards Interim London Housing Design Guide (2010) Housing SPG (2016)</u>		
	<u>Ravensbury General</u>		<u>CS3 - Morden Sub Area</u>	
	<u>EP R1 Townscape</u>	<u>3.5 - Quality and Design of Housing Developments</u> <u>3.7 - Large Residential Developments</u>		
	<u>EP R2 Street Network</u>	<u>6.9 - Cycling</u> <u>6.10 - Walking</u> <u>6.12 - Road Network</u> <u>6.13 - Parking</u>		
	<u>EP R3 Movement and Access</u>	<u>2.8 - Outer London: Transport</u> <u>6.3 - Assessing Effects of Development on Transport Capacity</u> <u>6.9 - Cycling</u> <u>6.10 - Walking</u> <u>6.12 - Road Network Capacity</u> <u>6.13 - Parking</u> <u>7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Soundscapes</u>		<u>DM T1 - Support for Sustainable Transport and Active Travel</u> <u>DM T2 - Transport Impacts of Development</u> <u>DM T3 - Car Parking and Servicing Standards</u> <u>DM T4 - Transport Infrastructure</u> <u>DM T5 - Access to the Road Network</u> <u>DM EP2 - Reducing and Mitigating Noise</u> <u>DM EP4 - Pollutants Transport Proposals - 01TN, 22TN and 18TN</u>
	<u>EP R4 Land Use</u>	<u>3.3 - Increasing Housing Supply</u> <u>3.4 - Optimising Housing Potential</u> <u>3.5 - Quality and Design of Housing Developments</u> <u>3.7 - Large Residential Developments</u> <u>3.8 - Housing Choice</u> <u>3.10 - Definition of Affordable</u>	<u>CS3 - Morden Sub Area</u>	<u>DM D3 - Alterations To Extensions To Existing Buildings</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>Housing</u> <u>3.11 - Affordable Housing Targets</u> <u>3.12 - Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes</u> <u>3.13 - Affordable Housing Thresholds</u> <u>3.14 - Existing Housing</u> <u>3.15 - Coordination of Housing Development and Investment</u> <u>Housing SPG (2016)</u> <u>Affordable Housing and Viability (2016)</u> <u>Character and Context SPG (2014)</u>		
	<u>EP R5 Open Space</u>	<u>3.2 - Improving Health and Addressing Health Inequalities</u> <u>3.6 - Children and Young Peoples Plan and Informal Recreation Facilities</u> <u>3.9 - Mixed and Balanced Communities</u> <u>3.16 - Protection and Enhancement of Social Infrastructure</u> <u>3.17 - Health and Social Care Facilities</u> <u>3.18 - Educational Facilities</u> <u>3.19 - Sports Facilities</u> <u>5.10 - Urban Greening Policy</u> <u>7.17 - Metropolitan Open Land</u> <u>7.18 - Protecting Open Space and Addressing Deficiency</u> <u>7.19 - Biodiversity and Access to Nature.</u> <u>Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)</u>	<u>CS11 - Infrastructure Policies</u> <u>CS13 - Open Space, Nature Conservation, Leisure and Culture</u>	<u>DM O1 - Open Space</u> <u>DM O2 - Nature Conservation and Leisure</u> <u>DM C1 - Community Facilities</u> <u>DM C2 - Education for Children and Young People</u>
	<u>EP R6</u>	<u>5.1 - Climate Change Mitigation</u>	<u>CS11 - Infrastructure Policy</u>	<u>DM - EP1 Opportunities for</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
	<u>Environmental Protection</u>	<u>5.2 - Minimising Carbon Dioxide Emissions</u> <u>5.3 - Sustainable Design and Construction</u> <u>5.6 - Decentralised Energy in Development Proposals</u> <u>5.7 - Renewable Energy</u> <u>5.9 - Overheating and Cooling</u> <u>5.11 - Green Roofs and Development Site Environs</u> <u>5.12 - Flood Risk Management</u> <u>5.13 - Sustainable Drainage</u> <u>5.14 - Water Quality and Wastewater Infrastructure</u> <u>5.15 - Water Use and Supplies</u> <u>5.18 - Construction, Excavation and Demolition Waste</u> <u>5.21 - Land Contamination</u> <u>7.14 - Improving Air Quality</u> <u>7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes</u> <u>Sustainable Design and Construction SPG (2014)</u>	<u>CS15 - Climate Change</u> <u>CS16 - Flood Risk Management</u> <u>CS17 - Waste Management</u>	<u>Decentralised Energy Networks</u> <u>DM - EP2 - Reducing and Mitigating Noise</u> <u>DM - EP3 Allowable Solutions</u> <u>DM - EP4 - Pollutants (Air, Land, Contamination, Water)</u> <u>DM - H4 Demolition and Redevelopment of a Single Dwelling House</u> <u>DM - F1 Support for Flood Risk Management</u> <u>DM - F2 Sustainable Urban Drainage Systems (SUDS) and Wastewater and Water Infrastructure</u>
	<u>EP R7 Landscape</u>	<u>5.10 - Urban Greening Policy</u> <u>7.5 - Public Realm</u> <u>7.8 - Heritage Assets and Archaeology</u>		
	<u>EP R8 Building Heights</u>	<u>7.1 - Lifetime Neighbourhoods</u> <u>7.2 - An Inclusive Environment</u> <u>7.3 - Designing Out Crime</u> <u>7.6 - Architecture</u> <u>7.7 - Location and Design of Tall and Large Development</u>	<u>CS14 - Design</u>	<u>DM D1 - Urban Design and Public Realm</u> <u>DM D2 - Design Considerations in All Developments</u> <u>DM D3 - Alterations to Existing Buildings</u>

MM30	Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
		<u>7.8 - Heritage Assets and Archaeology</u> <u>7.13 - Safety, Security and Resilience to Emergency</u> <u>London Plan Table 3.2 Density and Table 3.3 Housing Standards, Interim London Housing Design Guide (2010)</u> <u>Housing SPG (2016)</u>		<u>DM D4 - Managing Heritage Assets</u> <u>DM D7 - Shop Front Design and Signage</u>