

Merton Estates Local Plan Independent Examination

June 2017



Response to Draft Matters, Issues and Questions Identified by the Inspector

Clarion Housing Group (CHG)

Matter 2 – Eastfields Estate (Policies EPE1 – EPE8)

This Statement is made on behalf of Clarion Housing Group (CHG). Representations were made to the Draft Estates Local Plan (ELP) DPD in March 2016 and to the Publication Version in February 2017.

An outline planning application with all matters reserved for the regeneration of the Eastfields Estate has been submitted to London Borough of Merton in April 2017. The application includes a number of parameter plans and an indicative masterplan. A copy of the indicative masterplan is enclosed as Appendix 1.

We reserve the right to make further representations on these draft matters, issues and questions identified by the Inspector, and to any other points that may arise during the course of the Examination.

1. Does Policy EP E1 Townscape provide a sound, effective expression of the plan's overall vision (and interpretation of "Contemporary Compact Neighbourhood") for the estate? Should the Further guidance be included within the policy?

Policy EP E1 requires the creation of a focal point in the Estate. This Policy is considered to be overly prescriptive and does not allow for the scheme to develop in alternative and appropriate ways. This is contrary to the requirements of Paragraph 59 which requires flexibility in design policies. In order to maintain flexibility it is justified for the Further Guidance to remain as that.

As shown on the enclosed masterplan, a series of focal points are to be created along Acacia Road and Mulholland Close drawing people into the site. Centrally within the site a focal point is to be created by The Sparks, a cluster of taller buildings. This urban design approach presented in the masterplan follows detailed contextual analysis by the scheme architects and has developed following extensive consultation with the local community and key stakeholders. It is considered to be appropriate and therefore in order for Policy EP E1 to be sound, it should be amended to allow for either a single or a series of focal points to be created.

2. Taken together, are Policies EP E2 Street Network and Policy EP E3 Movement and Access justified and effective, with particular regard to:

- **whether the Further guidance should be policy?**

In order to maintain flexibility, the Further Guidance should remain as that.

- **proposals for Acacia Road/Mulholland Close/Clay Avenue in part (a) of both policies, in terms of traffic circulation, public transport, highway users' safety and crime and community safety;**

The masterplan proposals do not preclude the creation of continuous east-west street; however, these proposals would require works outside of the site boundary which would not be in CHG's control. Policy considerations relating

to highways safety, crime and community safety form part of the wider Development Plan and therefore do not need to be repeated in the ELP.

- ***part (b) of Policy EP E3 relates primarily to an area outside the plan boundary?***

This area is outside of the plan boundary and not within the control of CHG. As such these do not form part of the application proposals as shown on the indicative masterplan, although the Council could bring these works forward given it is within their ownership. Notwithstanding this, there would be improved connectivity through the site which would not prejudice upgrades to the link between Grove Road and Mulholland Close in the future. Part (b) of the Policy should therefore become Further Guidance rather than a policy requirement.

3. Is Policy EP E4 Land use, together with the Further guidance, sufficiently clear and precise to be effective, particularly with regard to density and provision for non-residential uses?

There are no existing non-residential uses on the site and therefore the reference to 're-provision' is incorrect. The Policy could make clear that the provision of complimentary non-residential uses could be acceptable subject to compliance with wider Development Plan policies, as allowed for by LP Policy 3.7.

The text on densities is considered to be sufficiently clear and precise and should be read in conjunction with the wider Development Plan, including The London Plan (2016). The planning applications will be considered against the Development Plan which already expresses policies on density. It is not considered necessary for this DPD to repeat these policies, instead, the ELP should provide flexibility for the masterplans to be developed following a design-led process to optimise development potential.

4. Is Policy EP E5 Open space, together with the Further guidance, sufficiently clear and precise to be effective; in particular, in its description of the quantum, distribution and type of space, including references in other documents to standards for recreation, play and gardens?

Policy EP E5 must be read in conjunction with the wider Development Plan and it is not therefore necessary to repeat policy on standards for recreation, play and gardens, for example part (d) in relation to garden sizes. These policies do not require current standards to be exceeded and there is no evidence to demonstrate this is required. As shown on the indicative masterplan, some of the houses will be provided as Mews style houses whereby the typology does not incorporate large private gardens. Greater flexibility should therefore be included in the policy to allow for the provision of different typologies within the scheme which could contribute to place making, successful urban design and housing choice.

5. Is Policy EP E6 Environmental Protection, particularly regarding flood risk, energy, construction impact and waste, effective in terms of its relationship, and possible repetition of and consistency with, development plan and local and national policies and guidance and the Building Regulations?

Other than in relation to battery storage, this Policy is considered to repeat existing development plan policies, national policy and Building Regulation requirements. Its inclusion is therefore considered to be not necessary or justified.

6. *Is Policy EP E7 Landscape overly detailed and prescriptive?*

The Policy requires that existing trees are retained; however this does not allow for the removal of trees where there are robust arboriculture or urban design reasons for doing so. This restrictive nature limits the design-led process which is otherwise understood to be supported by the Council and GLA. It is therefore suggested that this Policy is amended to allow for removal of trees where there are robust reasons to do so.