

MATTER 2 (EASTFIELDS)

Are the plan's policies for the Eastfields Estate positively prepared, justified, effective and consistent with national and local policy and guidance?

Yes, the council consider that the policies for Eastfields Estate have been positively prepared, are justified, effective and consistent with national and local policy and guidance?

QUESTION 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?

COUNCIL RESPONSE

Yes, Policy EP E1 Townscape provides a sound, effective expression of the Plan's overall vision (and interpretation of "Contemporary Compact Neighbourhood") for the estate?

It is not the purpose of this one policy to provide expression of the vision for the estate; it is the aim of all eight policies, the high level design principles and detailed design guidance together, to effectively express the vision. For Eastfields, the estate's relative isolation and dearth of contextual references, means that the content of the Townscape policy is focussed on the east-west street, its intersection and relationship with the surrounding open space.

The council considers that the content of para. 3.37 is a sound, effective way implementing element (c) of the policy. Therefore, as set out in Main Matter 1 Question 12, the council recommends that the "further guidance" paragraphs 3.37 and 3.38 sits logically within the Justification, between paragraphs 3.42 and 3.43 and should be relocated there

PROPOSED AMENDMENT

Proposed amendment to policy EP E1 **MA14**

EP E1 Townscape

Deleted ~~Further guidance~~

Relocate paragraph 3.37 and 3.38 to between Justification paras 3.42 and 3.43

QUESTION 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?**

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

COUNCIL RESPONSE

Yes, taken together Policies EP. E2 Street Network and Policy EP.E3 Movement and Access are justified and effective, particularly for the reasons set out below.

- **Should the Further Guidance be policy?**

In line with the approach set out in answering Matter 1, Question 12, the council recommends that minor amendments be made to the Further Guidance section of each of the policies to relocate it to within either the policy or the justification, to improve the clarity and effectiveness of the Plan.

In the case of Policy E2, Street Network, the council recommends that "Further guidance" paragraphs 3.44 and 3.45 be relocated to between Justification paras 3.48 and 3.49 to improve the clarity and effectiveness of the Plan.

In the case of Policy E3 Movement and Access, the first sentence of para 3.51 repeats Policy EP E3 element (a) and also paragraph 3.58 of the justification. Therefore the first sentence of paragraph 3.51 is recommended for deletion. **MA16**

The remainder of para 3.51 refers to the feasibility of rerouting bus services. This is similar to the content of the main policy regarding general vehicular access on this combined East-West street which is justified at paragraph 3.58. It is therefore recommended that the second sentence of para 3.51 be relocated to between para 3.58 and 3.59 **MA16**

- **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;**

Yes, the proposals for Street Network and Movement and Access 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 are considered justified and effective.

The first paragraph of the Justification of each policy (para 3.46 for E2 Street Network and para 3.52 for E3 Movement and Access) set out clearly and effectively that E2 Street Network is the policy about creating clearly defined and understood streets and E3 Movement and Access is the policy about establishing whether or not those streets, roads and junctions, once created, should be accessed in full or part by cars and other vehicles.

The primary objective of part a) of both policies is to address the relative isolation of the estate. The aim is to do this by creating direct and clear routes to the surrounding street network. This includes a future link to Grove Road and straightening the combined Acacia Road/Mulholland Close/Clay Avenue which is currently an unplanned series of three separate streets with no through visual link, as described in the ELP Eastfields “site analysis” paras 3.21-3.23, the Eastfields “issues Paras 3.27-3.31 and the opportunities (para 3.32)”.

An important part of this is to support cycling, reduce car dependency and to provide opportunities for improved local bus services to help residents move around and access local facilities and services. Network Rail have highlighted a number of safety concerns regarding the operation of the level crossing and adjacent roundabout. Delays on the roundabout also have a detrimental impact on bus service reliability. Creating an east-west through street could be used by bus services diverted away from the level crossing or to facilitate new services. This would help create a better pedestrian and cycle link.

Where issues of poor accessibility exist, the council considers it appropriate to explore the potential for improving access for all modes where practicable. It is not physically possible at the moment to drive from one side of the estate to another without a long detour, which contributes to congestion and air quality issues surrounding the level crossing.

Improving accessibility and visibility as well as the number of people on a street, is a deterrent to crime and enhances the sense of safety, reduces the fear of crime and feeling of isolation some residents can otherwise experience. Clearly an increase in use of a street would need to be commensurate with the residential nature of an area. Introducing a new bus services for example can support personal independence, access to employment and in directly create street activity. Bus services operate safely in many residential areas including in the adjacent street of Woodstock Way which is served by the 152 bus service and Meopham Road, which is served by the 463 bus service.

However creating a Street Network (policy EP2), which would provide visual and pedestrian links, is not the same as ensuring universal Movement and Access (policy E3) for all modes of transport without restriction or consideration of traffic circulation, highways users safety and other matters. The justification to Policy E3 Movement and Access (paragraphs 3.52 and 3.51) is clear that proposals for Acacia Road/Mulholland Close/Clay Avenue would need to be tested in terms of feasibility, trip generation, impact assessment and consultation.

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

Yes, Policy EP E3 element (b) does relate primarily to land outside the estate boundary. This is similar to Acacia Road/Mulholland Close/Clay Avenue (Policy EP E3 element (a), where both ends are clearly outside the estate boundary and the north side faces land outside the estate boundary.

The purpose of both these policy statements is to achieve the aim of better linking the estate to its wider setting, primarily through the creation or upgrading of east west and north south links through the estate and to the wider area. The estate’s seeming isolation from and restricted accessibility to its surrounds is identified in Eastfields site analysis (e.g.

paras 3.21-3.23; 3.25), issues (e.g. paras 3.27; 3.31) and opportunities (paras 3.33-3.36). The creation of the focal point at Policy EP E1 element (c), the north-south street at EP E2 element (b) and the access at EP E3 element (b) combine to address this accessibility and isolation issue.

Policy E3 element (b) requires improvement to the existing walking / cycling access from Grove Road south to Eastfields estate and the exploration (not delivery) of this existing route as a street. Improving the walking and cycling links between the Eastfields Estate and the Eastfields train station, the Acacia Centre and Mitcham town centre will help improve wider connectivity for residents

It is usually a requirement for significant residential development proposals, particularly in urban areas to implement or enhance local public transport services and deliver improvements outside the red line ownership boundary of the development site, including on highways land. Planning obligations, Section 106 agreements and Section 278 agreements can be used to facilitate the delivery of such measures in co-operation with the service provider (e.g. Transport for London) and / or the landowner (e.g. the local highways authority, the council).

PROPOSED AMENDMENTS

Proposed amendment to policy EP E2 **MA15**

EP E2 Street Network

Deleted ~~Further guidance~~

Relocate paragraph 3.44 and 3.45 to between Justification paras 3.48 and 3.49

Proposed amendment to policy EP E3 **MA16**

EP E3 Movement & Access

Deleted ~~Further guidance~~

The first sentence of para 3.51 repeats Policy EP E3 element (a) and also paragraph 3.58 of the justification. Therefore the first sentence of paragraph 3.51 is recommended for deletion.

~~“3.51 Consideration should be given to allowing through traffic on the east-west combined Acacia Road, Mulholland Avenue and Clay Avenue street.”~~

The remainder of para 3.51. (*“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”*) refers to the feasibility of rerouting bus services. This is similar to the content of the main policy regarding general vehicular access on this combined E-W street which is justified at paragraph 3.58. It is recommended that the second sentence of para 3.51 be relocated to between para 3.58 and 3.59.

QUESTION 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?

COUNCIL RESPONSE

The ELP (**SD1**) covers a significant regeneration and investment period of 10 - 15 years. It sets out a positively prepared strategically pitched framework to guide regeneration over the 10 - 15 years, with the level of prescription, such as density parameters to be determined at the planning application stage in accordance with relevant planning considerations and requirements set out by the whole statutory development plan.

Once adopted the ELP (**SD1**) will form part of the statutory development plan for the borough. The London Plan 2016 (**RD1**), Core Strategy (**MP2**) and Sites and Policies Plan (**MP3**) policy requirements collectively contain clear and robust parameters on appropriate density and non-residential uses that development proposals will need to adhere to for the site. To further improve clarity, an appendix is proposed to the ELP (**SD1**) detailing policies in the whole statutory development plan in addition to the ELP (**SD1**) policies to which development proposals will need to adhere to. The justification section of policy EP E4 includes reference to the London Plan density matrix (para 3.62) and it is proposed that this reference be further clarified by indicating the site's Urban setting.

The Council consider that the policy is sufficiently clear that the predominant land use of the estate will remain residential and the matter of non residential uses is covered robustly and sufficiently in part (a) of the policy and supporting paras 3.65 of the ELP (**SD1**). Requirements concerning non-residential uses are supported by evidence contained in Merton's Economic and Employment Land Study (**MP30**) and Retail and Town Centre Capacity Study (**MP 31**). The council considers that Policy EP E4 complies with the requirement for policies to be flexible in accordance with paragraph 21 of the NPPF (**ND4**).

PROPOSED AMENDMENT

It is proposed that the Further Guidance paragraph (3.60) be subsumed into the justification section of policy EP E4 in accordance with the response to Matter 1 Question 12.

To further improve clarity the addition of new ELP Appendix (4) setting out cross references to relevant statutory development plan policies in addition to the ELP policies to which development proposals for the three estates will need to comply with is proposed. This is attached as an appendix to this LBM responses document. **MA69**

Proposed amendment to policy EP E4 **MA17 & MA18**

EP E4 Land Use

Deleted ~~Further guidance~~

Relocate paragraph 3.60 to after Justification para 3.65 **MA17**

Proposed amendment to paragraph 3.62 **MA18**

Development proposals should accord with the London Plan density matrix and any other emerging or updated relevant policy requirements. *The London Plan density matrix identifies Eastfields estate as having an urban setting, which is characterised by being densely developed and located within 800m of Colliers Wood District centre.* As outlined in the London Plan.

QUESTION 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?

COUNCIL RESPONSE

No, policy EP E5 (Open Space) when read in conjunction with its associated further guidance and justification text is not considered to be sufficiently clear and precise regarding its description of the quantum, distribution and type of space requirements.

As such the council proposes a number of amendments to address this issue. These can be summarised as:

- ensuring policy E5 covers policy matters connected to designated open space only, as the ELP Glossary defines “open space” as designated open space in planning terms
- consequently ensuring that all matters not concerned with designated open space (e.g E5 (d.) on private amenity space) and moved to Policy E7 Landscaping.
- Proposing amendments to make the policies and their justifications clearer.

The council considers that Policy EP E5 (Open Space) element (a) clearly articulates the requirement for the re-provision of open space on site by articulating that there must be equivalent or better re-provision of designated open space regarding the quantity and quality of space provided. This is consistent with London Plan 2016 (**RD1**) Policy 7.18 Protecting Open Space and Addressing Deficiency.

On reflection, the council considers that ‘Further Guidance’ describing how this open space can be re-provided on site is contradictory and does not clearly articulate how open space should be re-provided. Further guidance paragraph 3.66 states that the number of open spaces and their individual size is not prescribed. This is not consistent with policy EP E5 (Open Space) element (a) which states that there must be an equivalent or better re-provision of quantity of open space.

Paragraph 3.66 goes on to state that open space can be provided in the form of a single space or a number of smaller spaces but that it is anticipated that there should be at least one large public open space in a new development. This does not clearly articulate how

designated open space can be re-provided to meet the requirements of Policy EP E5 (Open Space) element(a). In order to clearly guide how designated open space can be re-provided on site to meet this policy the following amendment to paragraph 3.66 is proposed:

In line with Matter 1 Question 12 the Further Guidance will be subsumed into the justification and further amendments will be made to the paragraph to increase the clarity of the plan.

In addition, justification text 3.70 contradicts Policy EP E5 (Open Space) element (a) as it states that subject to meeting appropriate minimum standards concerning outdoor amenity and play space, there is no requirement to provide additional open space within the development. Council considers that this text undermines the requirements to re-provide open space as stated in Policy EP E5 (Open Space) element (a). This text also states that an application would need to meet requirements for outdoor amenity space and play space. It is considered that these are dealt with in justification text paragraphs 3.73 and 3.74 respectively. For the reasons stated the Council proposes that justification text 3.70 be removed.

Another important open space requirement for Eastfield's is that a portion of the site has been identified as being deficient in access to open space as illustrated on the Eastfields: Areas deficient in access to Local Open Spaces diagram, located in Appendix 2, page 200 of the ELP (**SD1**). This deficiency is described in justification text 3.69 which states that Policy EP E2 (Street Network) and Policy EP E3 (Movement and Access) will 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. However, these policies do not make reference to this nor illustrate how this matter can be addressed.

In order to avoid confusion over what matters are open space matters (open space is defined as designated open space in the plan) and what are landscaping matters the council is proposing that all matters relating to designated open space stay within policy 5 and all other green / landscaped space sits within EP E7 Landscaping.

PROPOSED AMENDMENTS

Proposed amendments to policy EP E5 **MA19 - 25**

Insert the following new policy below Policy EP E5 (Open Space) element (a): **MA21**

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'.

Delete Policy EP E5 (Open Space) element (d), page 70: **MA24**

~~All new houses must have gardens that meet or exceed current space standards.~~

EP E5 Open Space

Deleted **Further guidance**

Paras 3.66 to 3.68 to become JUSTIFICATION **MA19**

Amend Further Guidance text 3.66, page 70 to read: **MA19**

~~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~~
Designated open space re-provided on site as required under Policy EP E5 (Open Space) (a) is anticipated (Could put 'should' for more emphasis?) to be re-provided as one contiguous open space as illustrated in the associated map. There is potential for a smaller portion of open space re-provided on site to be provided in the form of associated smaller parcels that are connected to this contiguous space.

Amend justification text 3.69 to read: **MA22**

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 f~~ 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 (0.2ha) at the south western corner of the site is deficient in access to Local Open Spaces (see map in appendix 2 ~~of this document~~). *Any proposed development of the site should consider addressing this deficiency through the design of street networks and movement and access 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 for residents to nearby parks and open spaces with the use of these policies. Refer to the associated map illustrating an example of how this could be achieved.*

Remove justification text 3.70, page 70: **MA20**

~~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.~~

Delete justification text 3.74, page 70: **MA25**

~~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.~~

Insert an illustrative diagram showing a route through the site which indicates how streets and footpaths can align to create shorter direct routes to open space surrounding the site

MA23

Proposed amendments to policy EP E7 **MA30**

Insert new policy below Policy EP E7 (Landscape) (f), page 78:

To ensure adequate provision of private amenity space in accordance with Policy DM D2, para 6.1 of the Merton Sites and Policies Plan, All new houses must have gardens that meet or exceed current space standards.

Insert below justification text 3.93 into Policy EP E7 (Landscape) (f), page 78: **MA31**

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.

QUESTION 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?

COUNCIL RESPONSE

Yes, the council considers Policy EP E6 Environmental Protection to be effective in its approach and consistent with local and national policy and guidance.

Regarding matters of **flood risk**, yes, the council are of the view that the policy EP E6 is consistent and effective in accordance with local, regional and national policies and guidance on flood risk and sustainable drainage.

EP E6 elements a), b) and c) are in accordance, consistent and effectively maintains the position set out with within the London Plan 2016 (**RD1**) Policy 5.13 and the supporting Sustainable Design and Construction Supplementary Planning Guidance (SPG April 2014) (**RD4**). The policy is also consistent and effective in its relationship with the Non-statutory Technical Standards for Sustainable Drainage Systems (Defra March 2015),¹ although it should be recognised that the London Plan 2016 (**RD1**) Policy 5.13 and the Design and Construction SPG (**RD4**) requires further betterment with regards to minimum standards for runoff rates, when compared to the national non-statutory technical standards.

Some areas of existing Eastfields Estate and the surrounding road network are shown to be at high and medium risk of surface water flooding as shown on the published Environment Agency's Surface Water Flood Map². Furthermore, the estate is shown to be located in a Critical Drainage Area (CDA 7_012) as shown in Merton's Surface Water Management Plan (SWMP 2011).³

¹ [Non-statutory Technical Standards for Sustainable Drainage Systems \(Defra March 2015\)](#)

² [Environment Agency's Surface Water Flood Map](#)

³ Available on request from LBM's LFA

Through redevelopment, there is an opportunity therefore to appropriately manage surface water flood risk in a sustainable manner which deliver multi-functional benefits for other policy areas and reduce surface water runoff rates from the site.

The policy requires applicants to aim to achieve green-field runoff rates, as reasonably practicable. Where it is not possible to achieve greenfield runoff rates, the policy requires full justification as to the reasons why, including calculations and drawings and take into consideration the existing and proposed impermeable areas, the existing and proposed surface water and foul drainage networks and an assessment of a range of return periods up to and including the 1 in 100 year plus change critical storm event. The drainage strategy for the site must ensure that climate change allowances for rainfall intensity are in accordance with the latest allowances published in Flood Risk Assessments: Climate Change Allowances⁴ planning practice guidance (published Feb 2016).

EP E6 element d) seeks to ensure that surface water flood risk, which is of a key issue for Eastfields noting the risks mentioned above, is given the same weight and consideration as other sources of flooding, in accordance with the NPPF (**ND4**) and NPPG (**ND13**). The layout of the site will need to have consideration of existing surface water flood flow routes and not increase surface water risk elsewhere through obstructing or adversely diverting flow routes.

<https://flood-map-for-planning.service.gov.uk/>

The council acknowledge that there may be some areas of repetition with national, regional and local policy and guidance. Therefore it is proposed to remove some aspects which may be regarded as duplication of policy.

Regarding **energy** matters, the need to improve the environmental performance of dwellings on the estate was central to the case for estate regeneration, as set out in the council's Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) (**SD5**). Hence the intended approach of Policy EP E6 is to strengthen and support local and national guidance to ensure that opportunities to deliver environmental performance are fully explored.

One of the key drivers set out in the council's SA/SEA (**SD5**), was to deliver improvement in the energy performance of new dwellings on the estate in comparison to the existing housing stock. The current Standard Assessment Procedure (SAP), used to assess a dwelling's energy performance in compliance with Building Regulations, does not allow for this comparison to be made. The council has therefore proposed an additional requirement under Policy EP E6 element (g) for development proposals to demonstrate the energy improvements made between the existing and proposed dwellings using energy performance certificate data.

The council considers the approach under EP E6 element (g) to be consistent with existing energy policies, as the development will still be required to demonstrate performance

⁴ [Flood Risk Assessments: Climate Change Allowance](#)

compliance with Building Regulations. By requiring the submission of energy performance certificate data, the policy will utilise an additional accurate and nationally recognised metric to demonstrate any betterment in environmental performance between the existing and proposed housing stock.

The emergence of new technologies provides further opportunities for new developments to explore innovative approaches to reducing the use of fossil fuels, carbon dioxide emissions and running costs for residents, but the pace of innovation often means that new technologies are not specifically referenced in existing policies. Policy EP E6 element (h) addresses this policy gap by encouraging developers to explore the potential environmental benefits of installing emerging innovative technologies; specifically on-site battery storage.

Policy EP E6 element (h) proposes an addition to the methodology used in SAP calculations for Building Regulations to enable the benefits of on-site battery storage to be fully considered. This approach allows the 20% of solar photovoltaic output traditionally discounted under SAP as 'distribution loss' to be recouped when solar photovoltaics are used in tandem with on-site battery storage. In this way the development is able to demonstrate environmental gains that cannot be attributed under the existing methodology, and discount the additional carbon savings from any emissions shortfall across the wider development.

The approach to battery storage detailed in Policy EP E6 element (h) is consistent with existing policy, as provision for the inclusion of innovative approaches is provided in London Plan 2016 (RD1) Policy 5.8: New Technologies. The policy is effective and helps strengthen local policy by providing a further opportunity to secure efficient supply of energy in accordance with tier two of the Mayor's energy hierarchy, as detailed in London Plan 2016 (RD1) policy 5.2: Minimising Carbon Dioxide Emissions.

The GLA have been consulted and advised that the proposed policy approach is operates within the scope of London Plan 2016 (RD1) policy 5.8: New Technologies, and is broadly consistent with their intentions to incorporate battery storage into the energy hierarchy in the next iteration of the London Plan (anticipated 2019). The GLA have indicated that battery storage fits within the 'be clean', renewable energy element of the energy hierarchy (as it is intended to be used in conjunction with solar PV), but they also accept that it could be considered as a 'be clean' element.

The council therefore considers the battery storage approach detailed in policy EP E6 to be consistent with the local and national policy direction and methodologies, and effective in ensuring that new and emerging technologies are fully considered in the development proposal.

The council acknowledges that policy EP E6 includes some aspects of repetition with local and regional policies and guidance, and is proposing to delete element e) of policy EP E6 and make some minor amendments to elements (f) and (g) to avoid unnecessary repetition.

The council proposes to amended paragraphs 3.84 and 3.86 of the justification of policy EP E6 to provide greater clarity on the methodology for attributing carbon savings from battery storage.

Regarding **construction impact** matters, the council acknowledges that Policy EP E6 element (k) is repetitious and is a matter that will be dealt with by way of planning condition and planning agreement. The council is therefore proposing to delete Policy EP E6 element (k)

Regarding **waste** matters, in order to improve clarity and effectiveness, and to ensure consistency with London Plan policy 2016 5.18 part C (**RD1**), the council suggests the inclusion of a reference to the requirement for the submission of a site waste management plan in Policy EP E6 element(l).

PROPOSED AMENDMENTS

Proposed amendments to policy EP E5 **MA26**

a) 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*.

b) Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan Policy *5.13 Sustainable D*rainage hierarchy as possible.

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 *multi-functional* benefits:

- Blends in and enhances amenity, recreation and the public realm
- Enhances biodiversity
- Improves water quality and efficiency
- Manages flood risk

d) 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.

~~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~~

~~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.

g) When preparing development proposals in accordance with Policy 5.3: **Sustainable design and construction** of the London Plan, proposals should include suitable comparisons between existing and proposed developments **at each stage of the energy hierarchy** 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.

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.

h) All domestic solar PV installations should be considered in conjunction with on-site battery storage.

k) Development proposals must be accompanied by a working method statement and construction logistics plan.

Proposed amendments to policy EP E5 element l) **MA27**

l) 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.

Proposed amendments to paragraphS 3.84 and 3.86 **MA28**

3.84 The principals **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 **can** be **easily** compared with the performance of existing buildings in an easily compared manner.

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 **The** need to develop policies to support Innovative Energy Technologies **innovative approaches** is outlined in London Plan Policy 5.8: **Innovative energy technologies**. Battery storage can be utilised as a method of increasing on-site renewable energy consumption, **providing** and provide 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 energy hierarchy: **outlined in London Plan policy 5.2: Minimising carbon dioxide emissions**. The **Standard Assessment Procedure (SAP)** 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.**

$$\text{Output of System (kWh/year)} = kWp \times S \times ZPV$$

$$\text{Carbon savings from battery storage (kWh/year)} = kWp \times S \times ZPV \times 0.2$$

kWp – Kilowatt Peak (Size of PV System)

S – Annual Solar Radiation kWh/m² (See SAP)

ZPV – Overshading Factor (See SAP)

QUESTION 6

Is Policy EP E7 Landscape overly detailed and prescriptive?

COUNCIL RESPONSE

No, Policy EP E7 is not overly detailed and prescriptive; the council considers this policy to be reasonable, appropriate, justified and effective. It identifies existing trees and vegetation for retention, requires retention, removal or enhancement of the existing green landscape and gives reasons for this and requires a landscaping strategy to be prepared. These are all reasonable things to ask for and would also be expected of any stand-alone planning applications of varying sizes of development. It links closely with the historical context, site analysis and suburban nature of the site and relates positively with the surrounding open space – a defining feature of the estate’s location.

