

# Merton Estates Local Plan Independent Examination

June 2017



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

### Clarion Housing Group (CHG)

#### Matter 4 – Ravensbury Estate (Policies EP R1 – EP R8)

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 access, scale and layout for approval for the regeneration of part of the Ravensbury Estate was submitted to the 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 R1 Townscape provide a sound, effective expression of the plan's overall vision (interpreting "Suburban Parkland Setting") for the estate, including the fact that some of the existing housing is proposed to be retained? Should some of the Further guidance be included within the policy, albeit that much of it refers to locations outside the plan boundary?**

It is not considered necessary for the Further Guidance to be provided within Policy EP R1, particularly as it includes land not within the ownership of CHG. In order to maintain flexibility, the Further Guidance should remain as that.

**2. Taken together, are Policies EP R2 Street Network and EP R3 Movement and Access justified and effective, particularly in the light of:**

- **Clarity and consistency of traffic movement and highway safety implications?**

The planning applications will be considered against the Development Plan which already expresses policies on these topic areas. It is not considered necessary for this DPD to repeat these policies.

- **crime and community safety implications?**

The planning applications will be considered against the Development Plan which already expresses policies on these topic areas. It is not considered necessary for this DPD to repeat these policies

- **whether some aspects of Further guidance should be included within the policy?**

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

- **whether appropriate flexibility is provided?**



It is considered that Policies EP R2 and EP R3 are prescriptive and could preclude flexibility during the design development of the proposals, particularly as the regeneration will be delivered over a number of years. This would be contrary to Paragraph 59 of the NPPF which requires design policies to include flexibility.

- ***implications for places and projects partly or even wholly outside the plan area (e.g. links to Morden Hall Park, to tram stops and via a new bridge to Wandle Road)?***

These works would be outside of the site boundary and therefore delivery is not within the control of CHG. These works could be undertaken by the Council and potentially funded by CIL contributions and should therefore be included as 'Further Guidance' rather than within the Policy.

**3. Does Policy EP R4 Land use, when taken as a whole with the Further guidance and the Justification, and in the context of LP and CS policies, effectively set out clear, robust and appropriate parameters for density, consistent with the vision for the estate?**

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. Does policy EP R5 Open Space (read alongside Policy EP R7 Landscape) provide sufficiently clear and appropriate indication of the quantum and distribution of amenity, play and recreational open space, having regard to but not prescribing standards set out in other documents?**

Policy EP R5 must be read in conjunction with other development plan documents 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. Furthermore, there may be constraints or other design justification which may result in some homes being provided with less than the standards set out; therefore, it is important that flexibility is provided so that these standards are not mechanically applied without appropriate consideration being given to other issues.

**5. Is Policy EP R6 Environmental Protection sound, having regard to the following:**

- ***whether its approach to flood risk is consistent with updated climate change guidance and development plan and local and national policies and guidance, without undue repetition? Does it fully reflect the specific risks and opportunities of the location? Should elements of Further guidance be included within the policy, albeit some refer to locations outside the plan boundary?***
- ***In order to maintain flexibility, the Further Guidance should remain as that, particularly as parts of it relates to works outside of the estate boundary and subject to consents from third parties. whether its approach to energy, construction impact and waste is 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 could therefore be considered to be not necessary or justified.

- ***whether it provides effective policy to enhance biodiversity?***

**6. *Is Policy EP R8 Building Heights, particularly its limit of four storeys (the height of Ravensbury Court flats), consistent with the vision for the estate, including the aim of retaining views of the surrounding tree canopy?***

The requirement for “*no buildings to extend higher than the existing Ravensbury Court flats*” is overly restrictive and is not consistent with the design led approach understood to be encouraged by the Council. It is not intended for the proposed development to exceed the height of Ravensbury Court in the outline planning application; however, there may be instances where flexibility is required to accommodate additional height due to the following:

- Differences in floor to ceiling heights between existing and proposed buildings;
- The need for service voids between floors;
- Differences in topography across the Estate;
- Site and finished floor levels which will be affected by the flood mitigation strategy; or
- Opportunities to further optimise the development potential of the site through additional height which may arise due to improvements to public transport infrastructure (i.e. improvements to the tramlink or bus services).

It is acknowledged that any increases in height would need to be fully tested having regard to townscape and heritage matters; therefore this justification would be required to be submitted with the planning application.

To allow for flexibility it is requested that the policy is re-worded so as to not preclude additional height. Potential rewording could state that “*maximum building heights across the site must **not significantly exceed** the height of Ravensbury Court*”. This would provide flexibility, ensure the Policy is effective and consistent with national policy, in particular Paragraph 59 of the NPPF.