

MATTER 4 (RAVENSBURY)

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

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

QUESTION 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?

COUNCIL RESPONSE

1.1 Yes, Policy EP R1 Townscape provides a sound, effective expression of the Plan's overall vision (and interpretation of "Suburban Parkland Setting") for the estate.

1.2 It is not the purpose of this one policy to provide expression of the vision for the estate; it is the aim of all policies, the high level design principles and detailed design guidance together, to effectively express the vision.

1.3 For Ravensbury, the content of the Townscape policy is focussed on the interface and relationship with the surrounding open space. There is relative freedom for design in the core of the site, taking into account the other policies and design guidance.

1.4 Ravensbury Estate is defined by, and essentially indivisible from, its parkland setting; including land outside the red line boundary. This is clear from the historical and site analysis. A key policy aim, enshrined in the Suburban Parkland Setting vision, is to protect and strengthen this. It is therefore considered appropriate that policies make reference to land outside the red line in this context and in achieving the vision for the site.

1.5 The retained housing has been taken into account in the creation of the vision for the estate. The retained housing is therefore consistent with this vision. In fact, the area of Hengelo Gardens is a significant factor in the character of the estate that led to the vision. This includes the spatial arrangement and mature vegetation. The taller buildings of Ravensbury Court (retained housing) serve to screen the adjacent industrial buildings and protect the parkland setting character. With respect to Ravensbury Court, the council recommends minor modification 24, set out in SD.3, to clarify matters regarding any changes to that building.

1.6 As set out in Main Matter 1 Question 12, the council recommends that the "further guidance" paragraphs 3.238-3.242 should be moved to the Justification section of this policy in a clear and effective way. **MA50**

QUESTION 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?**
- **crime and community safety implications?**
- **whether some aspects of Further Guidance should be included within the policy?**
- **whether appropriate flexibility is provided?**
- **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)?**

COUNCIL RESPONSE

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

2.1 Yes, the policies for R2 Street Network and R3 Movement and Access are considered justified and effective in terms of traffic movements, crime and community safety, flexibility and implications for places and projects outside the plan area. Main Matter 1 question 12 sets out the council's view on whether some aspects of Further Guidance should be included in the policy; this is addressed again here.

2.2 The first paragraph of the Justification of each policy (para 3.254 for R2 Street Network and para 3.259 for R3 Movement and Access) set out clearly and effectively that R2 Street Network is the policy about creating clearly defined and understood streets and R3 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

2.3 Policy EP R3 does not propose any changes to the vehicular movement arrangement and is clear, in R3 element d) that the main route for vehicles into the estate will remain Ravensbury Grove. Reference to highway safety implications (e.g. paragraphs 3.257, 3.266) relates primarily to safety issues caused by motorised traffic. Both policies promote improved pedestrian and cycle access into the estate, notably from Morden Road, and into both adjacent parks as part of the Wandle Trail. It is considered that an increase in pedestrians and cyclists would not harm highway safety

2.4 R3 element b) and justification paragraph 3.265 refer to improving the Wandle trail by relocating the existing pedestrian crossing on Morden Road so that cyclists feel less exposed to traffic and do not have to cycle on narrow shared-use footways along a very busy main road. Relocation of the pedestrian crossings will only take place following

detailed investigations, including a risk assessment to demonstrate that proposals are safe. This work could be taken forward through any Transport Assessment.

- **crime and community safety implications?**

2.5 Yes. Issues of addressing crime and community safety are woven throughout the Estates Local Plan. They are most explicit in The "Urban Design Principles" (Part 02) of the ELP which apply to all three estates are all founded on the principles of Secure by Design, including active frontages, defensible space, permeable, legible and accessible layouts.

2.6 Implementation of Policies R2 and R3 will support improved access to nearby bus and tram services and onward walking routes into Morden town centre. Linkages to Morden and Ravensbury Parks would also be enhanced. This is not just for residents within the estate, but the wider community. Existing routes are limited, indirect, poorly overlooked or absent, as set out in the site analysis and the justification paragraphs (e.g. 3.261, 3.264).

2.7 Implementation of the policies is likely to result in more people walking along the streets, which is considered a positive outcome as it will increase natural surveillance and security and deter opportunistic crime. A modest increase in pedestrian footfall is not expected to have a harmful effect on the relatively secluded character of the estate as specifically stated at the end of Policy EP R3 a).

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

2.8 As set out in the council's response to Main Matter 1, Question 12, the council has considered all aspects of Further Guidance throughout the Plan to ensure that the Plan is justified, effective and consistent with national and local policy. It is the council's view that the "further guidance" paragraphs help to interpret the policies and therefore that the "Further Guidance for policy R2 (3.251-3.253) should be relocated to within the Justification after para 3.256 and for policy R3, paragraph 3.257 should be relocated to between paras 3.261 and 3.262. and para 3.258 to after para 3.266 **MA51** and **MA52**

- **whether appropriate flexibility is provided?**

2.9 Yes, appropriate flexibility is provided. It is considered through vehicular traffic should not be substantially increased but enhanced pedestrian and cycle links are both appropriate and desirable for community cohesion. The policies allow for a degree of flexibility as to their implementation. The internal street network is not prescribed, and there is flexibility in the justification text as outlined above.

- 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)?

2.10 The ELP is justified and positively prepared in setting out how matters connected to the estate but outside its boundary could be delivered if required or desired. There are no

adverse implications regarding policies about places outside the estate boundary. The proposals set the policy framework for future enhancements how crossing points, vehicular access, connections with the Wandle Trail and other matters might benefit the estate. Such changes could be delivered via Section 106, Section 278s or a partnership arrangement with the highways authority, the National Trust and the developer or even entirely separately from the development.

QUESTION 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 and robust parameters in terms of density and non-residential land uses? Is the approach to increasing density positively prepared and justified?

COUNCIL RESPONSE

3.1 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 (**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 policies to which development proposals will need to adhere to. The justification section of policy EP H4 includes reference to the London Plan 2016 (RD1) density matrix (para 3.168) and it is proposed that this reference be further clarified by indicating the site's Urban setting.

3.2 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 3.171 – 3.173 of the ELP. 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 (**MP31**). The council considers that Policy EP H4 complies with the requirement for policies to be flexible in accordance with paragraph 21 of the NPPF (**ND4**)

3.3 It is proposed that the Further Guidance paragraphs (3.165 - 167) be subsumed into the justification section of policy EP H4 as per MA56

PROPOSED AMENDMENT

Proposed amendments to the further guidance MA54

~~Further Guidance~~ Justification

Proposed amendment to paragraph 3.269 **MA55**

...Development proposals must accord with the London Plan density matrix and any other emerging or updated relevant policy requirements... *The London Plan density matrix identifies Ravensbury estate as having an suburban setting, which is characterised by being predominantly residential with small building footprints.* As outlined in the London Plan...

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**

QUESTION 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?

COUNCIL RESPONSE

4.1 Yes, Policies EP R5 (Open Space) and EP R7 (Landscape) read together are considered to be sufficiently clear in indicating the quantum of play and recreational open space.

4.2 The quantum of private open space is prescribed in Policy EP H5 (Open Space) element d) which requires all new homes to have gardens that meet or exceed current space standards. This ensures that any application for the development of housing will be assessed in accordance with the private open space standards set out in the London Plan Housing Supplementary Planning Guidance (March 2016) **(RD6)**.

4.3 This policy is further explained in justification section 3.278 which describes how these gardens will enhance development in regards to functionality, the presence of trees and their contribution to enhanced biodiversity on site.

This policy currently sits within Open Space Policy EP R5 (Open Space) and it is considered that upon reflection this is a landscaping matter and would sit better within Landscape policy EP R7 to provide greater clarity over what matters are landscaping and what are in regard to designated open space within the estate. Please refer to the attached modification table advising of this amendment.

In regards to play space, Policy Policies EP R5 (Open Space) element c) requires that any development on site must provide suitable play spaces for all age groups in accordance with the Mayor of London's Play and Information Recreation Supplementary Planning Guidance

(SPG) ¹Document dated 2012. This policy clearly requires any development proposed play space for children to be assessed against this SPG.

In regards to designated open space on site a factual change to the plan is required as Merton Council's Planning Applications Committee resolved to grant permission for a scheme to develop a portion of the site situated in the location of this designated open space (Application Reference: 16/P1968) on 15 September 2016 subject to s106 legal agreement and conditions. Please [click here](#) to see the site location map for the location of the application.

The s106 legal agreement and conditions for the application were finalised on 9 May 2017. Please [click here](#) to see a copy of these.

Merton Council officers undertook an analysis of the proposal and recommended that the re-development of the site over the existing designated open space should be approved and that there was no requirement to re-provide this open space on site.

Page 184 of the planning officer's report describes why the Council's planning officer considered the departure application to be acceptable:

"... from an open space planning policy perspective and without prejudice to all the other relevant planning policy in this instance, it would be acceptable due to:

- *the relatively poor quality of the designated open space on this site,*
- *the proximity, quantity and quality of the adjacent protected open space,*
- *the relatively small quantity of open space that would be lost,*
- *the built footprint of the proposed buildings would be similar to that of the existing buildings,*
- *the dwellings would all have private amenity space*
- *the quality of the replacement open space (that could be designated with the next Policies Map review) and*
- *the site-wide landscape improvements that the proposals will bring"*

Further to this conclusion paragraph 8.1 states that the planning officer considered that the net loss of designated open space on site is considered acceptable on balance as described below:

"...The proposal would result in a net loss of open space within the site which would be contrary to adopted planning policy – however, this is considered acceptable on balance due to existing site characteristics and the quality of the proposed open space. It has been demonstrated that the proposal will not have an unacceptable impact on ecological aspects of the area and is therefore acceptable in this regard. The proposal would accord with the relevant National, Strategic and Local Planning policies and guidance and approval could reasonably be granted in this case. It is not considered that there are any other material considerations, which would warrant a refusal of the

¹ Mayor of London's Play and Information Recreation Supplementary Planning Guidance (SPG)

application.”

Please [click here](#) to see the planning officer’s report.

It is considered that the approved application has removed all designated open space from within Ravensbury Estate and as such there is no requirement under the National Planning Policy Framework Paragraph 74 and London Plan Policy 7.18 to re-provide designated open space on the estate.

In accordance with this decision Merton Council proposes the following factual modifications to the plan:

FACTUAL MODIFICATIONS

Remove Policy EP R5 (Open Space) element a), page 162: **MA57**

~~“The area of designed open space at the boundary with Ravensbury Park must be re-provided in terms of quality and quantity to a suitable location within the estate, with high quality landscaping and recreational uses.”~~

Remove justification text 3.273, page 162: **MA57**

~~“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 spaces should link into flood mitigation measures and the surrounding parkland”~~

Remove justification text 3.274, page 162: **MA59**

~~“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 be a better quality.”~~

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

COUNCIL RESPONSE

- **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?**

Yes, the council considers Policy EP R6 Environmental Protection to be effective in its approach and consistent with local and national policy and guidance.

Regarding matters of **flood risk**, the council are of the view that the policy EP R6 elements a) - e) are consistent with the updated Flood Risk Assessments: Climate Change Allowances² planning practice guidance (published Feb 2016), development plan and local and national policies and guidance. To ensure that the latest climate change allowances, are applied appropriately in any Flood Risk Assessment and Drainage Strategy for the site, we propose a modification to include specific reference to the allowances within the policy. The updated climate change allowances will need to be applied to both fluvial flood risk (i.e. river flow) and rainfall intensities in accordance with the latest guidance.

Flood risk is a key matter of consideration for Ravensbury given the existing risks and potential opportunities for flood risk reduction post development, and this is fully reflected in the policy wording and supporting justification text. The published Environment Agency flood map for planning³ (rivers and sea) and Merton's Strategic Flood Risk Assessment (**MP24**) (SFRA 2017) indicates that the majority of Ravensbury Estate falls within Flood Zone 3a associated with the fluvial risk from the River Wandle and its tributaries.

A sequential approach to site layout should be used. Where the River Wandle borders the southern site boundary, all development should be at least eight metres from the river. The hazard mapping shows that the centre of the site is at significant flood hazard, with lower hazard around the edge. Therefore, it is recommended that development with the greatest vulnerability (i.e. residential) should be located in the areas of "Low Hazard". Where possible, the development with less vulnerability (i.e. car parking, outside space) should be concentrated in the areas of greatest hazard, towards the centre of the site. In line with the risks posed to the site, it is imperative that flood risk mitigation measures are fully incorporated into development proposals, to ensure that the development is safe for its lifetime and does not increase flood risk elsewhere, such as through a loss of floodplain storage. Measures to manage surface water on the site should be undertaken at an early stage within the development proposals, to enable the inclusion of SuDS which deliver benefits for other policy areas as well as flood risk.

With regards to the question whether should elements of the 'Further Guidance' be included within the policy EP R6, with reference to some locations outside the plan

² [Flood Risk Assessments: Climate Change Allowance](#)
[Environment Agency Flood Risk For Planning](#)³

boundary, the Council is of the view that it is premature at this stage to move elements of paragraphs 3.279 - 3.282 into policy as we are not fully aware of the details and the potential impacts of the development proposals with regards to biodiversity and flood risk. It will be essential, as the plans for the redevelopment progress, that flood risk elsewhere is fully accounted for and modelled as part of the site specific flood risk assessment.

At the planning application stage, detailed assessments will be required to review impacts and propose appropriate mitigation and where required, environmental enhancements either on or off site, will be sought to offset adverse impacts.

The proposed amendments to policy EP R6 parts B-E are detailed below:

- **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?**

Regarding matters of **energy**, 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 (**SD5**). Hence the intended approach of Policy EP R6 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 Sustainability Appraisal / Strategic Environmental Assessment (**SD5**), was to deliver betterment in the energy performance of 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 R6 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 R6 element k) to be consistent with existing energy policies as the development will still be required to demonstrate performance compliance with Building Regulations. But, 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 R6 element l) addresses this policy gap by encouraging developers to explore the potential environmental benefits of installing emerging innovative technologies; specifically on-site battery storage.

The justification for Policy EP R6 element l) proposes an addition to the methodology used in Standard Assessment Procedure 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 R6 element I) is consistent with existing policy, as provision for the inclusion of innovative approaches is provided in London Plan 2016 Policy 5.8 **(RD1)** : New Technologies, 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 on the proposals and that they do not foresee any conflicts with future London Plan policy. The GLA have indicated that the proposed policy approach is operating 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 does acknowledge that policy EP R6 includes some aspects of repetition with local and regional policies and guidance. The council is proposing to remove policy EP R6 part J, and make some minor amendments to parts K and L to avoid any possibility of repetition.

Regarding **construction impact** matters, the council acknowledges that Policy EP R6 element n) is repetitious and is a matter that can be dealt with by way of planning condition(s) and planning agreement. The council is therefore proposing to remove Policy EP E6 element n),

Regarding **waste** matters, in to improve clarity and effectiveness, and to ensure consistency with London Plan policy 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 part O. The proposed amendments are detailed below:

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

Regarding **biodiversity** matters, policy EP R6 will be effective in helping to enhance biodiversity on the site by requiring new proposals to create links between the site, the surrounding parkland and the river corridor. This will enable a network of spaces for species

to move through the estate and effectively enhance the wildlife and ecological value of the site, as stipulated in Policy EP R6 element g).

The creation of a network of spaces that will improve the ecological value of the site is further contributed to by Policy EP R6 element d) which requires any major development application on the estate to use drainage and Sustainable Drainage Systems (SuDS) design that is designed and implemented in a way that enhances biodiversity. The relationship between this requirement and Policy EP R6 element g) ensures that any application to develop the site will be designed in an integrated way. This integrated policy approach is consistent with the NPPF (**ND4**) which states that opportunities to incorporate biodiversity in and around developments should be encouraged, and with The London Borough of Merton Core Strategy (2011) (**MP2**) Policy CS13 element g) (8) which states that the council requires development to integrate new or enhanced habitat design and landscaping which encourages biodiversity.

Further to this, Policy EP R6 element h) specifically requires the design of proposed developments to ensure that the wildlife and biodiversity values of the back channel tributary of the River Wandle, which runs along the southern boundary of the estate, is not compromised. The policy directs that any proposed design of buildings on the site in proximity to the river must not encroach on the river bank buffer zone. This policy clearly directs that the river bank buffer zone is to be managed for the enhancement of biodiversity.

Policy EP R6 element i) clearly and effectively ensures that any planning application to develop the site must ensure the preservation, protection and enhancement of protected species and habitats within the adjacent Ravensbury Park. In order to meet this policy, and understand the impact of any proposed development, an applicant would have to submit a full ecological assessment to Merton Council. This assessment would be required to analyse the impacts of the development upon habitats and protected species, both within the site, and in respect to the site's relationship to those within Ravensbury Park. This policy is consistent with London Plan 2016 (**RD1**) Policy 7.19 Biodiversity and access to nature, Planning decisions (C),(c) which states that development proposals should be resisted where they have significant adverse impacts on the population or conservation status of a protected species. Additionally Policy EP R6 part I is consistent with the London Borough of Merton Core Strategy (2011) (**MP2**) Policy CS13 part G (3) which states that the council will refuse development that has a significant adverse effect on the population or conservation status of protected or priority species and priority habitats.

PROPOSED AMENDMENTS

Proposed policy changes to EP R6 elements a) – e) **MA61**

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 **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.

b) *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.*

c) 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.

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 **multi-functional** benefits:

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

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 **fluvial and 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 **fluvial and surface water** flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.

Proposed policy changes to EP R6 elements j) – n) **MA62**

~~“(j) 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.~~

k) 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.~~

~~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 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.

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

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

Proposed policy changes to EP R6 elements o) **MA63**

o) 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.

The council has also adapted paragraphs 3.297 and 3.299 on page 167 of the Justification of policy EP R6 to provide greater clarity on the methodology for attributing carbon savings from battery storage. The wording in paragraphs 3.297 and 3.299 would be amended as follows: **MA64**

3.297 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.~~

3.299 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~~ ***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 ~~s~~***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.**

Output of System (kWh/year) = kWp x S x ZPV

Carbon savings from battery storage (kWh/year) = kWp x S x ZPV x 0.2

kWp – Kilowatt Peak (Size of PV System)

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

ZPV – Overshading Factor (See SAP)

Proposed policy changes to Further Guidance [MA65](#)

EP R6 Environmental Protection

Delete **Further guidance**

Para. 3.279 refers to the back channel. This is covered separately in para. 3.281 and has nothing to do with restoring the historic river channel. Therefore the first sentence of para 3.279. should be deleted and relocated to para 3.281 for clarity and effectiveness.

~~3.279 **The landscape character of the estate is reinforced by the back channel tributary of the River Wandle.** There is scope to reinstate a historic river channel which runs alongside Morden Road, which could connect with the existing watercourses within Morden Hall Park."~~

3.281 The landscape character of the estate is reinforced by the back channel tributary of the River Wandle. There is potential to enhance the back channel this tributary of the River Wandle, that which runs along the southern boundary of the site, subject to Environment Agency flood defence consent...."

Relocate para 3.279 (second sentence onwards) to between Justification para 3.286 and 3.287

Relocate paras 3.280 to 3.282 to between Justification paras 3.287 and 3.288

QUESTION 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?

COUNCIL RESPONSE

Yes, policy EP R8 is consistent with the vision for the estate. Policy EP R8 (a) states that no buildings must extend higher than the 4-storey Ravensbury Court flats. Policy R8 (a) also states that building heights must not compete with the established mature trees around the edge of the estate. However, this does not mean that all buildings should extend to four storeys regardless of where they are located, nor that buildings should be laid out to mask views of the surrounding tree canopy.

Thus, if a building of four storeys (or even fewer) is sited so that it clearly does compete with the views of the surrounding established mature trees, then it would not be in line with policy R8. The policy allows flexibility as to how the estate is laid out, requiring a comprehensive townscape appraisal and visual analysis (policy R8 (1) to be carried out to justify the estate's layout, building siting and height with too much prescription. There are several possible ways the estate could be designed, with different arrangement and varieties of building heights and building arrangements, in line with the policies in the ELP. These policies are positively prepared and justified but it is not appropriate for a strategic policy at this level to categorically state what precise height is appropriate in each location within the estate.