

LBM ELP MINOR AMENDMENTS (MA) – JUNE 2017

MOD REF	POLICY / PARAGRAPH / MAP	AMENDMENT	REASON
MA1	Part 2 Vision and Strategy	Creation of Overarching Policy 1 “Vision” – see appendix 1 to this table Creation of Overarching Policy 2 “Strategy” – see appendix to this table	Matter 1 Question 1
MA2	Part 2 Urban Design Principles	Creating of Overarching Policy 3: Urban design principles – see appendix 2 to this table	Matter 1 Question 11
MA3	Part 2 Urban Design Principles para 2.39	2.29 For Eastfields and High Path, CHMP propose regeneration of the whole estates and for Ravensbury a mixture of partial regeneration refurbishment and retention. The council has asked CHMP for evidence to support CHMP’s view that regeneration is the best way forward including:	Factual change
MA3A	Part 2 Key Drivers para 2.26	<p>2.26 (unchanged)</p> <p>(As per SD3 Mod ref no 04) : Page 20 add new Paragraph after 2.26 stating: Paragraph 2.26a (new 2.27) In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:</p> <ul style="list-style-type: none"> -The Mayor’s London Plan 2016 - Merton’s Core Planning Strategy 2011 -The South London Waste Plan 2012 -Sites and Policies Plan 2014 - Policies map 2014 <p>(as per SD3 Mod ref no. 05): Paragraph 2.26b (new 2.28) The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton’s Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton’s Local Plan. (as per MA3A proposed additional wording to new 2.28) Development</p>	

		proposals must meet the requirements of the whole statutory development plan. Please also refer to Appendix 4 for further details.	
MA4	Part 2, para 2.29	“2.39 This section outlines a set of broad design principles. Applications must demonstrate adherence to these principles in order to be in accordance with paras. 57, 58, 61 and 69 of the NPPF, in accordance with Policy 7.2 of the London Plan and in accordance with Policy DM D1 of the Merton Sites and Policies Plan. As such, all development proposals will be expected to achieve the highest standards of design, accessibility and inclusive design. The Equality Act...”	Matter 1 Question 5
MA5	Part 2 para 2.43,	Replace "open space" with "Landscaping" open space <i>landscaping</i>	Matter 1 Question 6
MA6	Part 2, para 2.45	Replace "open space" with "Landscaping" open space <i>landscaping</i>	Matter 1 Question 6
MA7	Part 2, para 3.4, third sentence	Public realm and open space <i>landscaping</i>	Matter 1 Question 6
MA8	Part 2 para 3.6, 6 th sentence	Open space: the location and type of spaces that <i>how designated open space</i> should be provided <i>considered</i> for each neighbourhood"	Matter 1 Question 6
MA9	Part 3, para 3.20	“The (<i>undesigated</i>) open spaces are defined by...”	Matter 1 Question 6
MA10	Part 3, para 3.20	“The houses’ back gardens face onto the <i>communal amenity</i> open space, setting up...”	Matter 1 Question 6
MA11	Part 3 page 55, caption under image on right of page	“Landscaped interior open space”	Matter 1 Question 6
MA12	Part 3 para 3.24	“... detract from the otherwise neat and pleasant <i>communal green</i> open space”	Matter 1 Question 6
MA13	Part 3, para 3.29	“with fronts dominated by garage doors and backs facing the <i>communal green</i> open spaces.”	Matter 1 Question 6
MA14	Eastfields EP. E1, townscape	Deleted <i>Further guidance</i> Relocate paragraph 3.37 and 3.38 to between 3.42 and 3.43	Matter 1 question 12

	further guidance	<p>3.42 A suitably located focal point will aid the integration of the neighbourhood in its location reducing the insularity of the estate whilst proving a key orientation focus which will help people in getting around the neighbourhood. A focal point at the intersection enables future development potential to the north of the estate to be brought forward in an integrated manner. Landmarks are useful in providing reference points for orientation and emphasize the street hierarchy</p> <p>3.37 Landmark buildings should be located around the focal point at the intersection of the north-south and east-west streets.</p> <p>3.38 Landmark buildings could be differentiated by appearance and to a degree by height; however they should be designed to ensure that they are sensitive to the general character of the rest of the development.</p> <p>3.43 Views through to open areas, such as the playground and cemetery, will better integrate the estate into the wider context.</p>	
MA15	Eastfields EP. E2 Street network, further guidance 3.44 etc	<p>Deleted Further guidance Relocate paragraph 3.44 and 3.45 to between 3.48 and 3.49</p> <p>3.48 The existing street network is a fragmented mix of streets created at different times. This is a major factor in making the estate feel fortress-like and impenetrable as well as difficult to navigate around the network of streets.</p> <p>3.44 Within the estate, there should be a clear, and easy to navigate network of streets, to enable free movement around, into and out of the estate. These should be a mix of traditional streets and mews type streets.</p> <p>3.45 The new East-West street should have the character of a traditional street, with carriageway flanked by footways either side. As it passes to the north of the estate,</p>	Matter 1 question 12

		<p>it should not be designed to feel as part of the estate, rather just as another local street.</p> <p>3.49 Combining the three streets of Acacia Road, Mulholland Close and Clay Avenue to form a new street will aid navigation and ensure visibility of the route between the residential areas either side of the estate.</p>	
MA16	Eastfields EP. E3 Movement and access, further guidance 3.51	<p>Deleted <i>Further guidance</i></p> <p>Delete first sentence of para 3.51</p> <p>3.51 Consideration should be given to allowing through traffic on the east-west combined Acacia Road, Mulholland Avenue and Clay Avenue street."</p> <p>Relocate second sentence of para 3.51 to between 3.58 and 3.59</p> <p>3.58 Despite the naturally isolated location, there are possibilities for improving movement and access, better linking the area to the surroundings. In particular, combining Acacia Road, Mulholland Avenue and Clay Avenue into a single street with full vehicular access at both ends should help to address the localised congestion at the level crossing, aid navigation and ease of movement around the area and estate generally. It is not intended to propose any through routes through the estate itself.</p> <p>3.51 second sentence relocated <i>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.</i></p> <p>3.59 Improvements to pedestrian and cycle access from the north could create a clear, open and well surveyed street to link up with the railway footbridge to the north and into the estate and cemetery to the south.</p>	Matter 1 question 12
MA17	Eastfields EP. E4	Deleted <i>Further guidance</i>	Matter 1, question 12

	land use, further guidance PARA 3.60 onwards	<p>Relocate para 3.60 to after para 3.65</p> <p>“3.65 In accordance with Sites and Policies Local Plan Policy DM E4 (Local Employment Opportunities) major developments proposals will be expected to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. Merton’s Local Plan identifies a local deficiency in convenience retail provision to the east side of the estate. Any proposals for retail provision will need to accord with Merton’s Local Plan policies including CS7 (Centres) and DM R2 (Development of town centre type uses outside town centres).</p> <p>Relocated 3.60 <i>Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate such as business space or local retail facilities, these should be located at the focal point where the North-South and East-West streets intersect (see map on following page). This will make them most easily accessible to all, including those outside the estate, and support local legibility and orientation.</i></p>	
MA18	Eastfields EP E4 Land Use para 3.62 onwards	<p>Paragraph 3.62</p> <p>Development proposals should accord with the London Plan density matrix and any other emerging or updated relevant policy requirements. <i>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 Mitcham District centre.</i> As outlined in the London Plan...</p> <p><i>Current Paragraph 3.60</i> <i>Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate such as business space or local retail facilities, these should be located at the focal point where the north-south and east-west streets intersect (see map on following page). This will make them most easily accessible to all, including</i></p>	Matter 2 Question 3

		those outside the estate and support local legibility and orientation. ...to be retained in full and moved to below existing paragraph 3.65	
MA19	Eastfields EP E5 Open Space, further guidance text 3.66, page 70	The number of open spaces and their individual size is not prescribed. Open space can be provided in the form of a single space or a number of smaller spaces. However one of the key positive characteristics of the existing estate is the large central space, and it is anticipated there should be at least one large public open space in the new development. <u>Designated open space re-provided on site as required under Policy EP E5 (Open Space) (a) is anticipated to be re-provided as one large open space.. It could also be provided as a series of connected, smaller open spaces</u>	Matter 2, Question 4
MA20	Eastfields EP E5 Open Space, justification text 3.70, page 70.	Deleted Further guidance Paras 3.66 to 3.68 to become JUSTIFICATION Remove justification text 3.70, page 70: Subject to meeting appropriate minimum standards concerning the provision of outdoor amenity space and play space, there is not requirement to provide additional public open space within the development.	Matter 2, Question 4
MA21	Eastfields EP E5 Open Space, new policy inserted below Policy EP E5 (Open Space) (a), page 70.	Insert the following new policy below Policy EP E5 (Open Space) (a): <u>Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with the London Plan policy 7.18 'Protecting Open Space and addressing Deficiency'.</u>	Matter 2, Question 4

MA22	Eastfields EP E5 Open Space, justification text 3.69, page 70.	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). <u><i>Any proposed development of the site should consider addressing this deficiency through the design of street and routes through the site in accordance with Policies EP E2 (The Street Network) and EP E3 (Movement and Access). There is potential to alleviate this deficiency by creating shorter routes to nearby parks and open spaces with the use of these policies.</i></u>	Matter 2, Question 4
MA23	Eastfields, Open Space Policy EP E5 (Open Space) maps	Insert an illustrative map showing a route through the site which indicates how streets and footpaths can align to create shorter direct routes to open space surrounding the	Matter 2, Question 4
MA24	Eastfields, Policy EP E5 (Open Space) (d), page 70.	(moved to policy E7) All new houses must have gardens that meet or exceed current space standards.	Matter 2, Question 4
MA25	Eastfields Policy EP E5 Open Space, justification text 3.74, page 70.	(moved to policy E7 Landscaping) 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.	Matter 2, Question 4
MA26	Eastfields EP E6 Environmental Protection	a) <u><i>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.</i></u>	Matter 2 Question 5

	<p>b) Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan Policy <i>5.13 Sustainable Drainage</i> hierarchy as possible.</p> <p>c) Sustainable Drainage Systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following <i>multi-functional</i> benefits:</p> <ul style="list-style-type: none"> • Blends in and enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>d) The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development <i>taking the latest climate change allowances into account</i>. Potential overland <i>surface water</i> 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 <i>surface water</i> flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p> <p>e) Proposals should seek to link existing and proposed open space in a unified landscape layout; this should include minor green corridors that will encourage species to move from the cemetery into or through the development</p> <p>“f) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor’s Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.</p> <p>g) When preparing development proposals in accordance with Policy 5.3: <i>Sustainable design and construction</i> of the London Plan, proposals should include suitable comparisons</p>	
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		<p>between existing and proposed developments <i>at each stage of the energy hierarchy</i> in order to fully demonstrate the expected improvements. All new development proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure and sustainable procurement of materials.</p> <p>h) Technological improvements in battery storage have started to provide a potential energy storage solution suitable for use in connection to domestic solar PV systems. The use of on-site storage offers a potential technological solution that would increase on-site renewable energy consumption, reduce utility costs and provide in-situ demand side management. Battery storage can therefore be considered to sit within the ‘be lean’ or middle level of the energy hierarchy. Domestic PV installations should therefore not be considered without exploring the potential for on-site energy storage. Carbon savings from the incorporation of appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero.</p> <p><i>h) All domestic solar PV installations should be considered in conjunction with on-site battery storage.</i></p> <p>k) Development proposals must be accompanied by a working method statement and construction logistics plan.</p>	
MA27	Eastfields EP E6 Environmental Protection	<p>l) Development proposals should <i>demonstrate, by means of the submission of a site waste management plan, how they will</i> apply the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location using the most appropriate means.</p>	Matter 2 Question 5
MA28	Eastfields EP E6 Environmental Protection para 3.84 onwards	<p>3.84 The principals <i>principles</i> 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 <i>environmental improvements</i> 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</p>	Matter 2 Question 5

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 ~~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)

MA29	Eastfields EP. E7 Landscape, further guidance	<p>Deleted Further guidance</p> <p>Move para 3.89 to between 3.92 and 3.93</p> <p>3.92 There is much scope to improve views of, and the physical link between the surrounding landscape and the estate, without undermining the calm character it gains from its relative isolation. Linking the landscape to the surrounding area should enable the development to better integrate into the wider suburban area.</p> <p>Relocated paragraph <i>3.89 There is scope to strengthen green links to the cemetery by terminating North-South streets adjacent to the cemetery with pocket parks. Pocket parks will strengthen green corridors and enhance views of the adjacent landscape</i></p> <p>3.93 Planting arrangements help strengthen the navigation of routes and enhance views between the residential areas either side of the estate. A balance needs to be made between tree planting defining the space whilst not undermining views of the route past the estate.</p>	Matter 1 question 12
MA30	Eastfields, policy inserted below Policy EP E7 (Landscape) (f), page 78.	<p><i>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..</i></p> <p>(red text is new (Matter 1, Question 7) ; black italic text is moved from policy E5 (Matter 2 question 4)</p>	Matter 1 question 7 and Matter 2, Question 4
MA31	Eastfields, Policy EP E7 (Landscape) Insert below	<p><i>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.</i></p>	Matter 2, Question 4

	justification text 3.93 into		
MA32	Eastfields EP. E8 Landscape, further guidance	<p>Deleted <i>Further guidance</i></p> <p>Move para 3.94 and 3.95 to after Justification para 3.97</p> <p>3.97 Development proposals will need to demonstrate careful consideration of proposed building heights in relation to internal open space and views into the estate from the wider area, across the cemetery and any other longer vantage points. A clear strategy on building heights will be needed to ensure the suburban character of the area is not unduly compromised.</p> <p>Relocated paragraph <i>3.94 Taller buildings may be appropriate in certain places and careful consideration should be given to ensure they are located so as to appear in harmony and complement the mature vegetation and physically define open spaces. Buildings should not have a negative impact on the surroundings on account of their height and should relate well to the surrounding context and public realm particularly at street level.</i></p> <p>Relocated paragraph <i>3.95 Taller buildings must be carefully placed so as not to create poor microclimates or large areas of shaded streets or spaces. Where taller buildings are proposed, they should also be used to reinforce the sense of space or the character of a street, rather than fragment it with excessively varied building heights.</i></p>	Matter 1 question 12
MA33	High Path EP.H1 Townscape, further guidance 3.130 onwards	<p>Deleted <i>Further guidance</i></p> <p>Move para 3.130, 3.131 and 3.132 to between Justification paragraphs 3.134 and 3.135</p> <p>3.133 Orientation and getting around (legibility) within the estate is difficult mainly because of the siting of the current buildings. There is poor definition of streets and</p>	Matter 1 question 12

		<p>spaces and a lack of built or landscape enclosure to aid this, making it unclear where the private or public spaces are.</p> <p>3.134 The creation of clear and unobstructed views through the design of streets is important for people to find their way around (legibility) the estate and to physically and visually link the estate to the wider area.</p> <p>Relocated paragraph <i>3.130 Townscape features should be used as a design framework in which to deliver the vision for High Path of an interpretation of the New London Vernacular. Within this framework proposals should create a strongly urban re-imagining of this style with excellent access to public transport. Proposals will be expected to integrate well with the surrounding urban form in terms of layout, scale and massing, whilst making the best possible use of land. How successfully this is done will be a key requirement against which design quality is assessed.</i></p> <p>Relocated paragraph <i>3.131 The new estate should ensure its built form has a clear definition of private and public space and a range of appropriate landmarks, views (vistas) and focal points to aid orientation around and within the estate.</i></p> <p>Relocated paragraph <i>3.132 The quality of Morden Road should be improved by enabling the creation of a consistent street width with parallel building lines, tree planting and appropriate building heights either side of the street.</i></p> <p>3.135 The Tramlink extension proposals are still at a feasibility stage. This engagement may also open up opportunities to improve the quality of Morden Road Therefore early engagement with TfL will be required to inform development proposals for this site</p>	
MA34	High Path EP.H2 Street network,	Deleted Further guidance Relocate para 3.137 to 3.141 to after Justification para 3.144	Matter 1, question 12

	<p>further guidance</p>	<p>3.144 The creation of traditional streets north to south will help integrate and re-connect the estate to its surroundings. The creation of clear east to west link will help bring together all the different new character areas and offer a safe cycle and pedestrian priority link across the estate.</p> <p>Relocated paragraph <i>3.137 A new north-south street between Hayward Close and Pincott Road should be provided, linking Merton High Street and High Path to help link the estate with the surrounding road network.</i></p> <p>Relocated paragraph <i>3.138 New North-south streets between Pincott Road and Abbey Road, linking Merton High Street and Nelson Grove Road should be provided. These new streets will help connect the new neighbourhood effectively and efficiently with the existing grid pattern layout.</i></p> <p>Relocated paragraph <i>3.139 Layouts should be designed to future-proof pedestrian access from South Wimbledon tube station directly into the estate should TFL support a second entrance to the tube station in the future. This would be located to the rear of the station building to link Morden Road and Hayward Close. This would increase public transport accessibility and provide additional pedestrian routes into and out of the new neighbourhood.</i></p> <p>Relocated paragraph <i>3.140 Mews Street style development should be reserved for shorter streets such as Rodney Place.</i></p> <p>Relocated paragraph <i>3.141 Whilst Rodney Place, is outside the estate boundary, linking it into the street pattern of the estate should be explored as this could help improve links within the area and make it easier to get around.</i></p>	
MA35	High Path EP.H3 Movement and	<p>Deleted Further guidance Relocate all paragraphs (3.145 to 3.152) within the former “Further guidance”</p>	Matter 1, question 12

	<p>Access, further guidance</p>	<p>section to within the Justification. Reorder all the paragraphs so that the Justification flows clearly and consistently (e.g., the paragraphs referring to parking are located beside each other)</p> <p>Delete the second, unnecessary “Justification heading on page 110 (above para 3.161)</p> <p>3.153 “This policy section is about establishing the main vehicular movement strategy. This is different from the creation of streets, which may, or may not support through vehicular movement. Proposals for vehicular movement must be supported by appropriate traffic modelling and be in general compliance with relevant transport policies, whilst also aiming to achieve good vehicular permeability and convenience for residents.</p> <p>3.155 The estate is predominantly surrounded by busy main roads and junctions. As a result, vehicular access is controlled to deter rat-running through the estate. Access is from a one-way entry point into Pincott Road from Merton High Street to the north; access from Abbey Road to the east, an exit from High Path onto Morden Road to the west; and from Merantun Way to the south, where traffic movements are left and right into High Path, but restricted to left out only from High Path. The surrounding busy road network forms physical barriers to movement, especially for pedestrians and cyclists. This is particularly acute on Morden Road and Merantun Way and reinforces the need to better connect the estate to neighbouring areas.</p> <p>3.156 Similarly where Merantun Way crosses the River Wandle, this stops the estate from connecting with the wider surrounding area. Reviewing movement and crossing opportunities could help ease some of these connectivity issues.</p> <p>3.159 High Path runs along the southern boundary of the estate. The road is traffic calmed and the western section beyond Pincott Road is oneway towards Morden</p>	
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	<p>Road where it also passes Merton Abbey Primary School and St John’s the Divine Church. The vehicular exit onto Morden Road is restricted to left turn only, this manoeuvre can be particularly acute for large vehicles due the limited amount of turning space available. There is also a cycle lane along the northern footway.</p> <p>3.158 Within the estate many of the pedestrian and cycle routes are poorly defined, which makes it difficult to distinguish between public and private areas. The building layout makes the estate feel unsafe and unwelcoming.</p> <p>3.157 Widespread congestion in the local area brings specific problems to the estate. This relates primarily to Abbey Road being used as a cut through to avoid the heavily congested South Wimbledon junction on the north-west corner of the estate. Physical measures are widely applied across the area to manage traffic speeds. Regeneration of the estate provides an opportunity to tackle the wide range of traffic issues the area faces.</p> <p>Relocated paragraph <i>3.145 The potential for Abbey Road to be continued directly southwards to make a new junction with Merantun Way to make a more easy to navigate road layout should be explored. This could simplify the layout and the amount of road space taken. This approach could also support the siting of new bus stop facilities in the area.</i></p> <p>Relocated paragraph <i>3.147 Should the land between High Path and Merantun Way become available for redevelopment this could provide the opportunity for a more comprehensive redesign of Merantun Way to form a boulevard style street with, tree planting, footways and segregated cycle lanes, whilst still maintaining its important movement function. Proposals should facilitate this opportunity.</i></p> <p>Relocated paragraph <i>3.148 Proposals likely to have an impact on Merantun Way or the wider Strategic Road Network should to be discussed at an early stage with</i></p>	
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Transport for London.

Relocated paragraph 3.149 As part of their Transport Assessment, applicants should, at the outline stage, look specifically at the impacts of increased population density on the needs of the bus network. This should include reviews of bus stop locations, routes and service frequencies.

3.160 The one-way section of High Path currently experiences localised congestion – notably associated with the primary school – including conflict between vehicles and cyclists, as well as a restricted junction with Morden Road. There is potential to review how this street operates in order to resolve these issues and improve conditions for users, notably for cyclists. The crossing of Morden Road and potential future tram extension will need to be considered as part of this.

3.161 Recent demand forecasting work by TfL suggests that current annual passenger demand will rise from 31m to around 56m by 2031 even without Crossrail 2, which would serve the nearby Wimbledon town centre. As part of accommodating this growth, TfL is planning a range of improvements to Tramlink, including network capacity and service frequency enhancements on the Wimbledon branch. To achieve this, TfL is currently exploring a new tram line extension to serve the South Wimbledon and/ or Colliers Wood area. Work on this is continuing, and any proposals regarding regeneration of the estate will need to take account of these developing proposals.

Relocated paragraph 3.151 Proposals for expanding the tram network include the possibility of terminating a new branch line at South Wimbledon. The street layout should be designed so as to accommodate this. In doing so, it should also facilitate the creation of a boulevard style street and address existing severance issues caused by the existing conditions at Morden Road.

	<p>3.162 Preparation of development proposals for the estate will require the applicant to engage with TfL to ensure future delivery of the necessary transport infrastructure, including for the tram should it affect the estate.</p> <p>3.163 Delivery of the Tramlink extension would increase access to public transport in an area identified for intensification in the London Plan and population growth.</p> <p>3.164 Located beside South Wimbledon underground Station, the estate is attractive to commuters to central London as well as parking from nearby businesses. This has led to parking on the estate by businesses and commuters causing parking problems for residents. This is possible because existing parking controls have been implemented in a piecemeal manner, resulting in a disjointed and ineffective regime overall.</p> <p><i>Relocated paragraph 3.146 Well-designed on-street parking provision helps create activity, vitality and provides overlooking of the street (natural surveillance). Where provision of parking is on-street it is important that this is arranged and managed in a sensitive manner. Where parking is provided off-street at ground level, with garden podiums above, care needs to be taken to ensure a positive active street frontage and good internal design to the residential units that wrap around the parking.</i></p> <p><i>Relocated paragraph 3.154 Parking on the estate will be provided in accordance with the London Plan (as amended) parking standards taking into account specific local conditions and requirements. This should be supported by a Parking Management Strategy.</i></p> <p><i>Relocated paragraph 3.150 With increased density of development, parking management will need to be improved for the whole estate with a coherent and comprehensive parking strategy, that protects access and prevents indiscriminate parking. Provision of a Controlled Parking Zone (CPZ) should be actively considered as</i></p>	
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		<p><i>a means of achieving this.</i></p> <p>Relocated paragraph <i>3.152 Increased density combined with changing shopping trends will create an increased level of demand for servicing and deliveries, along with the everyday needs for refuse collection etc. Proposals should investigate a range of traditional and innovative methods of addressing and managing servicing needs to minimise vehicle movements and parking requirements. Proposals for the whole estate should include a Servicing and Delivery Strategy”</i></p>	
MA36	High Path EP.H4 Land Use, further guidance	<p>Deleted Further guidance</p> <p>Relocate para 3.165 to 3.166 to between Justification para 3.170 and 3.171 Relocate para 3.167 to between Justification para 3.172 and 3.173</p> <p>Order and amendment of paragraphs is as follows:</p> <p>“3.168 High Path and most of the surrounding area.... Relevant policy requirements. As outlined in the London Plan the density matrix should be used flexibly and in conjunction with other development plan policy documents. <i>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.</i></p> <p>3.170 Development proposals will be expected to contribute to optimising the latest borough and London housing supply requirements in order to meet local and strategic need. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, Local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet resident’s individual needs.</p>	Matter 1, question 12; Matter 3 question 3

	<p>Relocated paragraph <i>3.165 Wherever practicable, different types of residential development (e.g. apartments, maisonettes and houses) should be arranged across the estate in a way that reinforce local character.</i></p> <p>Relocated paragraph <i>3.166 Different street types should support residential types that are suitable to them. Therefore smaller scale, shorter and narrower streets will be more suitable for town houses and mews development. Wider, longer streets, with more vehicular traffic, will be more suitable for flats and maisonettes.</i></p> <p>3.171 In accordance with policy DM E4 (Local Employment Opportunities) major developments proposals will be expected to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. Merton’s Local Plan identifies a local deficiency in convenience retail provision to the east side of the estate. Any proposals for retail provision will need to accord with Merton’s Local Plan policies including CS7 (Centres) and DM R2 (Development of town centre type uses outside town centres).</p> <p>3.172 The site is bounded by major roads on two sides, lined predominantly by shops, cafes, restaurant and similar uses. Subject to meeting the Local Plan policies, provision of such uses (e.g. retail shops, financial and professional services, café/ restaurants, replacement of public houses, offices, community, health, leisure and entertainment uses) may contribute to meeting the day to day needs of the local population. This would complement the area and provide services and facilities that may be needed. This also supports the principles of local context, sustainable development and active frontages.</p> <p>Relocated paragraph <i>3.167 The frontages to Morden Road and Merton High Street may be appropriate locations for the provision of a range of commercial and community uses to support the new development subject to meeting relevant Local</i></p>	
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		<p><i>Plan policies.</i></p> <p>3.173 Based on the Local Plan Sites and Policies Plan Policy DM R2, the council supports the replacement of the existing convenience shop (i.e. shop selling everyday essential items) in Pincott Road. Any proposed new local convenience shop which is located outside the designated town centre and parades boundary and is above 280 sqm will be subject to sequential test and impact assessment.</p>	
MA37	High Path Policy EP.H5 (c), page 116.	(moved to EP H6 “Landscaping” justification) All new homes must have gardens that meet or exceed current space standards.	Matter 3 question 4
MA38	High Path EP H5 Open Space, further guidance 3.174	<p>Delete heading Further guidance</p> <p>Delete justification paragraph 3.174, The number of open spaces and their individual size is not prescribed. Open space may be provide in the form of a single space or a number of smaller spaces. However, proposals intending to provide multifunctional space should preferably provide one large area”.</p> <p>Move “Justification” heading to above para 3.175</p> <p>“Justification</p> <p>3.175 Open spaces should be located in the most accessible points...”</p>	Matter 1 question 12; Matter 3 question 4
MA39	Not used	Not used	Not used
MA40	High Path EP H5 Open Space Justification text 3.178, page 116.	<p>Development proposals should demonstrate how proposed new public open space would address the identified deficiency in access to public open space. and that the appropriate minimum standards concerning the provision of outdoor amenity space and play space have been achieved. <i>Any proposal should clearly demonstrate how the play space needs of all age groups will be addressed in accordance with the Mayor of London’s ‘Play and Informal Recreation’ Supplementary Planning Guidance</i></p>	Matter 3/Question 4

		<i>document (2012).</i>	
MA42	High Path EP H6 Environmental Protection	<p>a) <i>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 practicable.</i></p> <p>b) Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan Policy <i>5.13 Sustainable Drainage</i> hierarchy as possible.</p> <p>c) Sustainable Drainage Systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following multi-functional benefits:</p> <ul style="list-style-type: none"> • Blends in and enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>d) The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development <i>taking the latest climate change allowances into account.</i> Potential surface water flow paths should be determined and appropriate solutions proposed to minimise the impact of the development, for example by configuring road and building layouts to preserve existing surface water flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p>	Matter 3 Question 5
MA43	High Path EP H6 Environmental Protection policy (h)	<p>h) The feasibility of CHP and district heating must be investigated. As a minimum this should include:</p> <p>(i) An assessment of the secondary heat sources within a 400 metre radius of the site boundary (e.g. river water heat recover from the Wandle; heat extraction from the London Underground).</p> <p>(ii) Evidence to demonstrate ongoing engagement with key stakeholders associated with the potential secondary heat sources, such as Transport for London and the Environment Agency feasibility.</p>	Matter 3 Question 5

- (iii) Evidence that the CHP has been designed and built in line with the London Plan *policy 5.6: Decentralised energy in development proposals* and associated guidance (e.g. the Mayor's draft Air Quality SPG) which seeks high air quality standards and mitigates air quality impacts as well as reducing carbon emissions *specifically in respect to:*
- *Plant size and specification*
 - *Plant-room design*
 - *Future network connectivity*
 - *Air quality standards.*
- (iv) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.
- (v) 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

		<p>appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero.</p> <p><i>l) All domestic solar PV installations should be considered in conjunction with on-site battery storage.</i></p>	
MA44	High Path EP H6 Environmental Protection policy k	<p>k) Development proposals should <i>demonstrate, by means of the submission of a site waste management plan, how they will</i> apply the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainably in the right location, using the most appropriate means.</p>	Matter 3 Question 5
MA45	High Path EP H6 Environmental Protection para 3.191 onwards	<p>3.191 Local environmental conditions such as air quality, noise and over heating overheating must be taken into consideration during the design process. <i>The scheme should be designed and built in accordance with relevant local guidance (including London Plan policies 5.6: Decentralised energy in development proposals and 7.14: Improving air quality, the London Heat Network Manual, Merton’s District Heating Feasibility – Phase 1: Heat Mapping and Energy Masterplanning study, and Merton’s draft Air Quality SPG).</i> Careful consideration should be taken in order to ensure that efforts to mitigate against these issues does not resulting result in unforeseen negative impacts.</p> <p>3.194 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.</p> <p>3.196 Technological improvements in the field of energy storage have resulted in the improved feasibility of deploying battery storage in connection with domestic solar PV systems. and the The need to develop polices to support Innovative Energy Technologies 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</p>	Matter 3 Question 5

		<p>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.</p> <p>Output of System (kWh/year) = kWp x S x ZPV</p> <p>Carbon savings from battery storage (kWh/year) = kWp x S x ZPV x 0.2</p> <p><i>kWp – Kilowatt Peak (Size of PV System) S – Annual Solar Radiation kWh/m2 (See SAP) ZPV – Overshading Factor (See SAP)</i></p>	
MA46	High Path EP.H7 (e), page 124.	Relocated from H5 All new homes must have gardens that meet or exceed current space standards.	Matter 3 question 4
MA47	High Path EP H7	Deleted Further guidance Relocate para 3.198 to 3.200 to between Justification para 3.203 and 3.204	Matter 1, Question 12; Matter 3 Question 4

	Landscape, further guidance para 3.198 onwards	<p>Relocate para 3.201 to after Justification para 3.204</p> <p>3.203 Retaining trees, as with historic streets, provides the basis from which to develop design proposals.</p> <p>Relocated paragraph <i>3.198 The mature trees and vegetation on the south side of High Path should be retained with good management.</i></p> <p>Relocated paragraph <i>3.199 The case for retention or felling of trees - other than those groups specifically identified in this policy - on the estate, will be based on the tree survey undertaken by the Council's arboricultural officer. 3.200 Proposals should ensure the provision of a good variety and quantity of street trees.</i></p> <p>Relocated paragraph <i>3.200 Proposals should ensure the provision of a good variety and quantity of street trees.</i></p> <p>3.204 Landscaping has the potential to improve the quality of a place, but this will only work if it is appropriate to the location and there is a clearly defined, funded and managed maintenance regime in place.</p> <p>Relocated paragraph <i>3.201 The design of streets should include the provision of soft landscaping that is appropriate, robust and efficient to maintain.</i></p>	
MA49	High Path EP H8 Building Heights, New justification text 3.205, page 124.	<i>The provision of gardens that meet space standards increases their functionality, potential for tree planting and promotion of biodiversity. Front gardens or defensible space that allows for some planting, is also encouraged.</i>	Matter 3 Question 4
MA48	High Path	Deleted Further guidance	Matter 1, Question 12

	<p>EP H8 Building Heights, further guidance para 3.207 onwards</p>	<p>Relocate para 3.205 to 3.206 to after Justification para 3.207</p> <p>3.207 The existing estate has a wide range of building styles and heights. A more even distribution of heights will reduce these negative characteristics and help new development fit in comfortably with its surroundings. It will also create neighbourhood streets that are easy to understand. In order to fit well with the surroundings, it is important to ensure building heights on the edge of the estate relate appropriately to those adjacent to it.</p> <p>Relocated paragraph <i>3.205 Taller buildings must be carefully placed so as not to create poor microclimates or large areas of shaded streets or spaces. Where taller buildings are proposed, they should also be used to reinforce the sense of space or the character of a street, rather than fragment it with excessively varied building heights. Building heights should be similar along the lengths of street and one either side in order to maintain a consistent character.</i></p> <p>Relocated paragraph <i>3.206 The potential widening of Morden Road to accommodate a tram extension should be taken into consideration, should this proposal go ahead, the resulting adjustment to street proportions may better accommodate taller buildings on the east side of Morden Road, however the transition to lower buildings further east into the estate and effects on the visual environment should be properly managed and designed.</i></p>	
<p>MA50</p>	<p>Ravensbury EP R1 Townscape, further guidance paras 3.238 onwards</p>	<p>Deleted Further guidance</p> <p>Relocate “further guidance” paragraphs 3.238 to 3.242 (as modified) to within the Justification section of this policy in a clear and effective way.</p> <p>Relocated paragraph <i>3.238 Townscape and landscape features should be used as a design framework in which to deliver the vision for Ravensbury, of building as part of a Suburban Parkland Setting. Within this framework proposals should create development that sits comfortably within, and is highly respectful to, its unique</i></p>	<p>Matter 1 Question 12</p>

landscape whilst making efficient use of the land. Proposals will be expected to demonstrate how they form an integral part of the landscape setting and retain this character through building forms, layouts, streets, use of landscaping and choice of materials. Integrating better to the wider setting is also important. How well proposals respond to these requirements will be a key means by which design quality is assessed.

3.243 The townscape of the estate is somewhat secondary to the landscape. However, it does have the feel of a quiet and pleasant residential neighbourhood, as the housing on Morden Road prevents much of the traffic noise from penetrating within. The flats and housing to be retained are generally pleasant in appearance, though the larger block of flats suffers from a rather dead frontage due to a lack of entrances on the frontage.

3.244 The Orlit houses fronting Morden Road provide a strong building edge to the estate, which helps define the character of Morden Road, and reinforces the curved shape of the road. This winding nature creates prominent points along the route defined by the corners and the buildings at them – such as the mill and pub. There is scope to improve the quality of these spaces, and better link the estate with its surroundings without compromising its quiet character.

3.245 On Morden Road the entrance to Ravensbury Park is obscured from view and highlighting the park entrance will strengthen visual links into the park from the surrounding area.

3.246 The architecture of the adjacent mill building provides inspiration for creative interpretation in the design of buildings at this prominent corner of the estate adjacent to Ravensbury Park. Cues should be used to inform the design of new homes whilst ensuring proposals integrate well into a high quality landscape setting.

	<p>3.247 The Surrey Arms Public House and adjacent weather-boarded cottage are key elements in the surrounding townscape. Their location adjacent to Morden Hall Park entrance is a key focal point. Development proposals provide the opportunity to reinforce these key elements.</p> <p>3.248 Ravensbury Mill occupies a prominent location on the approach to the estate. Improving and enhancing the setting around the entrance to Ravensbury Park will help to highlight the Mill.</p> <p>3.249 visibility into Morden Hall Park on Morden Road is poor due to the current boundary treatment. Regeneration of the estate provides an opportunity to work in conjunction with the National Trust to enable views from the estate into this high quality landscape. Replacing timber fences with railings and improvements to the park entrance could increase visibility and accessibility of the park whilst improving the physical environment on Morden Road. Adding a new entrance opposite the Mill may also be a possibility.</p> <p>Relocated paragraph <i>3.239 Proposals should investigate working in conjunction with the National Trust concerning the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road.</i></p> <p>Relocated paragraph <i>3.240 Proposals should investigate working in conjunction with The National Trust to strengthen the Wandle Trail and ensure there is a unified approach to surface finishes, boundary treatments and materials used along the Trail.</i></p> <p>3.250 The remains of Ravensbury Manor are hidden from view amongst dense vegetation within Ravensbury Park. Uncovering remnants of these ruins will highlight the local history of the area and the park as part of the former estate of Ravensbury Manor.</p>	
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		<p>Relocated paragraph <i>3.241 Proposals should investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.</i></p> <p>Relocated paragraph <i>3.242</i> (paragraph as modified from SD3, minor modification 24)</p> <p>Development proposals should consider alteration of the internal layouts of the ground floor flats to Ravensbury Court, to reorientate the front doors onto the pleasant open space in front of the block. Changes to the layout of the rear of these retained flats could also improve car parking and provide some private back gardens</p> <p><i>At the time of the preparation of this plan, there are currently no proposals to refurbish Ravensbury Court that would require planning permission. Any future proposals to refurbish Ravensbury Court flats should be explored in partnership with residents. Subject to residents' views, these could consider providing doors to the living rooms of the ground floor flats to provide direct access from the open space on Ravensbury Grove. There is also scope to improve the space to the rear of the flats for the benefit of residents.</i></p>	
MA51	EP R2 Street Network para 3.251 onwards	<p>Deleted Further guidance</p> <p>Relocate paras 3.251-3.253 to within the Justification after para 3.256</p> <p>3.256 Despite the relative isolation of the estate and its physical constraints of the river and park, there is significant potential to improve links towards Morden town centre, by opening up the frontage onto Morden Road via new street and footpath connections.</p> <p>Relocated paragraph <i>3.251 The estate is bounded by Morden Road, which is a busy traffic route. Targeted traffic management measures along Morden Road at key points should be considered to improve pedestrian connectivity to the surrounding</i></p>	Matter 1 Question 12

		<p><i>area, reduce severance caused by traffic and improve road safety.</i></p> <p>Relocated paragraph 3.252 <i>The access lane and parking for the houses fronting Morden Road should preferably be removed and used for tree planting and a new cycle route. This approach could also accommodate flood attenuation measures, such as a swale or uncovering of the historic watercourse. Some parking may be retained but should be better integrated into the layout.</i></p> <p>Relocated paragraph 3.253 <i>New street network proposals should be well designed to provide clear connections that will reduce the current detached make-up of the estate, whilst ensuring that the estate does not become a through route for vehicular traffic from Morden Road. Any new East-West streets should form clear connections from Ravensbury Grove to Morden Road with active frontages onto public space. A new access from Morden Road with flexibility for vehicular movement may also be considered, subject to an assessment of potential impacts.</i></p>	
MA52	Ravensbury EP R3 Movement & Access	<p>Deleted Further guidance</p> <p>Relocate paras 3.257 to between paras 3.261 and 3.262</p> <p>Relocate para 3.258 to after para 3.266</p> <p>3.261 Whilst the estate does have physical links to the surrounding area, they are generally poor and few in number. Morden Road is a busy road that creates severance between the two parks and the estate, as well as to the tram-stops to the north. To the south, the River Wandle presents a barrier to the residential area around The Drive. Whilst there is currently a footbridge, it is not conveniently located for north-south movement and is poorly overlooked.</p> <p>Relocated paragraph 3.257 <i>Proposals should consider introducing physical features at key focal points along Morden Road to better manage the speed and flow of traffic and to improve road safety. To enhance pedestrian links there is also opportunity to build a new bridge to create a new direct north– south pedestrian link</i></p>	Matter 1, Question 12

from Wandle Road to the Ravensbury Estate.

3.262 There are two tramstops a short walk away that provide frequent services between Wimbledon and Croydon town centres. Bus routes also pass close to the estate providing access to Morden town centre, connections with other bus routes and the London Underground Network.

3.263 There is significant potential to improve direct links towards Morden by opening up the frontage onto Morden Road through new street and footpath connections. Proposals should create an easy to understand street layout for the estate including improved links to the Wandle Trail and Ravensbury Park supported by way-finding signage.

3.264 Links from within the estate towards Morden consist of either a back alley or detour to the north. The pedestrian routes between the parks and cycling facilities on Morden Road are also unclear. The paths through Ravensbury Park are poorly overlooked with few escape points into the surrounding street network. It is therefore easy to get lost or disorientated in the area.

3.265 There is potential to improve movement and access around the estate in a way that is relatively low-key whilst retaining the quiet feel of the estate. The crossing from Morden Hall Park to the estate is a key link in the Wandle Trail in connecting Morden Hall Park to Ravensbury Park. There is scope to improve this crossing through enhancements to footways and crossing points which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment.

3.266 The amount of traffic using Morden Road makes for an unfriendly environment for pedestrians and cyclists. Measures to better control traffic and improve pedestrian and cyclist safety could be achieved by a range of methods,

		<p>including surface treatments, raised crossing points, cycle paths, width restriction or build outs and pedestrian refuges. The most appropriate measures should be investigated whilst ensuring the road blends into the area making it feel like a place rather than dominating the space. A new bridge across the river linking Ravensbury Grove to Wandle Road would improve pedestrian links to nearby tram stops and bus stops.</p> <p>Relocated paragraph <i>3.258 Developing cycle links further along Morden Road, for night time cycling when Morden Hall Park is less accessible, should be considered.</i></p>	
MA53	Ravensbury EP R4 Land Use	<p>Deleted Further guidance Delete para 3.267: this paragraph is not effective 3.267 Applicants may propose other land uses, though these must be appropriate to the site and comply with local planning policies. However, it is considered unlikely there will be any demand for other non-residential uses.</p>	Matter 1, Question 12
MA54	Ravensbury EP R4 Land Use	Further Guidance Justification	Matter 4 Question 3
MA55	Ravensbury EP R4 Land Use para 3.269	<p>Paragraph 3.269</p> <p>...Development proposals must accord with the London Plan density matrix and any other emerging or updated relevant policy requirements... <i>The London Plan density matrix identifies Ravensbury estate as having an suburban setting, which is characterised by being predominantly residential with small building footprints.</i> As outlined in the London Plan...</p>	Matter 4 Question 3
MA56	Ravensbury EP	<p>Delete Further guidance Relocate Paras in “Further guidance” to become JUSTIFICATION The exact location is</p>	Matter 1, Question 12

	R5 Open Space	laid out in the Mods Table in the response to matter 4 question 4 (Ravensbury R5 Open Space policy)	
MA57	Ravensbury Policy EP. R5 Open Space (a) page 162	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.	MATTER 4, Question 4
MA58	Ravensbury Policy EP R5 Open Space Justification Text 3.273, page 162	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.	MATTER 4, Question 4
MA59	Ravensbury Policy EP R5 Open Space Justification Text 3.274, page 162	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.	MATTER 4, Question
MA60	Ravensbury Policy EP.R5 Open Space (a), page 162	Relocate to Policy EP R7 (Landscape) – New policy EP R7(f) All new houses and flats must have gardens or amenity space that meet or exceed current space standards.	MATTER 4, Question 4
MA61	Ravensbury Policy EP.R6 Environmental protection (a), page 162	a) As the estate is in close proximity to the River Wandle and modelled is shown as <i>being</i> at <i>high</i> risk of fluvial flooding, development proposals will need to <i>be designed by applying a sequential approach to flood risk and</i> 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.	Matter 4 Question 5

		<p>b) <i>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.</i></p> <p>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.</p> <p>d) Sustainable Drainage Systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following multi-functional benefits:</p> <ul style="list-style-type: none"> • Blends in and enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>e) The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development <i>taking the latest climate change allowances into account</i>. 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.</p>	
MA62	Ravensbury EP R6 Environmental Protection (j onwards)	<p>“j) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayors Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.</p>	Matter 4 Question 5

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.

Regarding **construction impact** matters, the council acknowledges that Policy EP R6 part 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 Part N, but retain the further guidance detailed in paragraph 3.300 of the policy justification on page 167. The proposed amendments are detailed below:

		<p>n) Development proposals must be accompanied by a working method statement and construction logistics plan.</p> <p>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:</p>	
MA63	Ravensbury EP R6 Environmental Protection (o onwards)	<p>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.</p>	Matter 4 Question 5
MA64	Ravensbury EP R6 Environmental Protection (j onwards)	<p>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.</p> <p>3.299 Technological improvements in the field of energy storage have resulted in the improved feasibility of deploying battery storage in connection with domestic solar PV systems. and the The need to develop polices 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</p>	Matter 4 Question 5

		<p>be considered to be a ‘be clean’ measure within the Mayors 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.</p> <p><i>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.</i></p> <p>Output of System (kWh/year) = kWp x S x ZPV</p> <p><i>Carbon savings from battery storage (kWh/year) = kWp x S x ZPV x 0.2</i></p> <p><i>kWp – Kilowatt Peak (Size of PV System)</i> <i>S – Annual Solar Radiation kWh/m2 (See SAP)</i> <i>ZPV – Overshading Factor (See SAP)</i></p>	
MA65	Ravensbury 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.	Matter 1, Question 12

	<p>3.279 <i>The landscape character of the estate is reinforced by the back channel tributary of the River Wandle.</i> 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.”</p> <p>“3.281 <i>The landscape character of the estate is reinforced by the back channel tributary of the River Wandle.</i> 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...”</p> <p>Relocate para 3.279 (second sentence onwards) to between Justification para 3.286 and 3.287</p> <p>Relocate paras 3.280 to 3.282 to between Justification paras 3.287 and 3.288</p> <p>3.286 The interface between any proposed development and Ravensbury Park needs careful consideration, with particular reference to the habitats of the protected species within this area e.g. bats. This is a sensitive edge and a balance must be met between providing an active frontage onto the parkland whilst protecting the habitats of the park and surrounding vegetation.</p> <p>Relocated paragraph <i>3.279 [First sentence removed] 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.</i></p> <p>3.287 Reinstatement of a historic river channel running alongside Morden Road, would help to enhance the Wandle trail creating a stronger landscape link between Morden Hall Park and Ravensbury Park whilst improving the estates riverside setting, as well as contributing to flood mitigation measures.</p> <p>Relocated paragraph <i>3.280 Proposals should where possible enhance the outlook of the estate and improve the setting of the park whilst addressing biodiversity</i></p>	
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		<p><i>habitats.</i></p> <p>Relocated paragraph 3.281 <i>There is potential to enhance the back channel tributary of the River Wandle that runs along the southern boundary of the site, subject to Environment Agency (EA) flood defence consent as this is a designated main river. Improvements should seek to improve surveillance and interface between the park, buildings and the water, as well as better management of habitats.</i></p> <p>Relocated paragraph 3.282 <i>There is also potential to undertake inchannel and river bank enhancements to the main channel of the River Wandle to the south of the site within Ravensbury Park, providing this does not increase flood risk. Any such works will be subject to Environment Agency flood defence consent. This enhancement could involve the narrowing of the channel to increase the normal flow velocity, in order to help reduce siltation and stagnation in this stretch of the Wandle.</i></p> <p>3.288 Proposals are expected to be developed in consultation with relevant statutory and local interest groups such as the Environment Agency, the National Trust and the South East Rivers Trust (The Wandle Trust).</p>	
MA66	Ravensbury Policy EP.R5 (a), page 162	Remove policy and relocate to Policy EP R7 (Landscape) – New policy EP R7(f) All new houses and flats must have gardens or amenity space that meet or exceed current space standards.	Matter 4, Question 4
MA67	Ravensbury EP R7 Landscape para 3.301 etc	<p>Deleted Further guidance</p> <p>Relocate Para. 3.301 to after Justification para 3.306</p> <p>3.306 The Wandle Trail is interrupted by Morden Road and the narrowing of Ravensbury Park. There is scope to strengthen the green corridor link between Morden Hall Park and Ravensbury Park through the use of landscape features such as tree planting on Morden Road. This would also help to improve the continuity of the Wandle Trail and improve accessibility into the park.</p>	Matter 1, Question 12

		Relocated paragraph <i>3.301 Landscaping measures should be designed to improve the green corridor link between Ravensbury Park and Morden Hall Park.</i>	
MA68	Ravensbury EP R8 Building Heights 3.307 etc	<p>Deleted Further guidance Relocate Paras. 3.307 to 3.309 to after Justification para 3.310</p> <p>3.310 All existing buildings are two storey with the exception of the one larger four-storey block, Ravensbury Court. This low rise form is what allows views to the tree-line visible around the estate from numerous locations, which is one of the defining characteristics of the estate’s setting. The low-rise buildings also define the estate as a suburban place, although it is considered there is more scope to sensitively increase heights to create more homes so long as views to the trees which envelop the site are not obstructed and the landscape character of the overall estate remains strong.</p> <p>Relocated paragraph <i>3.307 Housing types, whether houses or flats, should preserve the landscape character of the estate.</i></p> <p>Relocated paragraph <i>3.308 Where landscaping features allow, the creation of wider streets with width to height street proportions which enable wider and longer views should be considered.</i></p> <p>Relocated paragraph <i>3.309 Redevelopment proposals should give very careful consideration as to the site layout, landscaping, building heights and street widths to ensure the unique landscape character of the estate is retained. Any proposals to increase density should demonstrate how this will not result in undermining this character.</i></p>	Matter 1, Question 12

MA69		Addition of new ELP (Appendix 4 of the ELP) 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. This is attached as Appendix 3 of this minor amendments table	Matter 1, Questions 2, 3 and 4 and Matter 3 question 3
MA70	Part 04 Page 176	Design requirements for Information to support planning applications submissions	
MA71	Part 04 Page 177	<p>To ensure that the ELP aligns with the HRA, London Plan and Local Plan policy and satisfactorily addresses any potential risk of harm from the development of the estates the following guidance is proposed in Part 04: requirements for planning applications: To be located between paragraph 4.8 and 4.9 on page 177</p> <p><i>Impact of development on Wimbledon Common and Richmond Park Special Areas of Conservation:</i></p> <p><i>Development proposals that are likely to have a significant effect upon Wimbledon Common or Richmond Park Special Areas of Conservation are required to submit an appropriate assessment under the European Union’s Habitats Directive (92/43/EEC). As prescribed in the Habitats Regulations Assessment (HRA) for the Estates Local Plan (Dated X) the applicant should agree the scope and methodology of the assessment with Natural England and Merton Council. The assessment should address what potential impacts the proposal could have on a SAC, identify how any impacts can be avoided, minimised or mitigated and if the proposal will have a significant impact on the ‘site integrity’ of the SAC. The assessment should assess how the proposal meets Policy 7.19 Biodiversity and Access to Nature of the London Plan (2016), Policy CS13 Open Space, Nature Conservation, Leisure and Culture of the London Borough of Merton Core Strategy (2011) and Policy DM 02 Nature Conservation, Trees, Hedges and Landscape Features of the London Borough of Merton Sites and Policies Plan (2014).</i></p>	Matter 1 Question 8
MA72	Part 2, spatial	<i>Eastfields: spatial diagram of all policies (E1-E8) (added title to diagram on page 31)</i>	

	diagrams for each estate on page 31, 33 and 35	<i>High Path: spatial diagram of all policies (H1-H8)</i> (added title to diagram on page 33) <i>Ravensbury: spatial diagram of all policies (R1-R8)</i> (added title to diagram on page 35)	
MA73	All three estates: new element into Policy EP E5 (Open Space) – page 70, Policy EP H5 (Open Space) – page 116 and Policy EP R5 (Open Space) – page 162	<i>Development proposals must be supported by an analysis of the current and future need for the provision of indoor and outdoor sports facilities in order to support the population arising from the proposals. Any proposals should in accordance with Sport England’s Planning for Sport Aims and Objectives protect existing facilities, enhance the quality, accessibility and management of existing facilities and provide new facilities to meet demand.</i>	Matter 1 question 6
MA74	Insert new justification text into justification text for Policy EP EF (Open Space) – page 70, Policy EP H5 (Open Space) – page 116 and Policy EP R5 (Open Space) – page 162.	<i>Development proposals should demonstrate the impact that they will have on the use of existing indoor and outdoor local sports facilities. The scope and methodology of the research will be prescribed by Sport England and the local planning authority, during pre-application discussions. Any identified shortfall should be mitigated where appropriate through either a condition attached to a planning decision, a section 106 agreement or the Community Infrastructure Levy (CIL) as identified at the planning decision making stage. In accordance with the NPPF and the London Plan, Merton Council is committed to delivering a new playing pitch study in support of the planned borough-wide Local Plan.</i>	Matter 1 question 6

MA1

Black text already appears in the submission Estates Local Plan

Red text is additions for clarity

OEP 1 Vision

Overarching Plan Vision

Development proposals for Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Mitcham / Morden) must create sustainable well designed safe neighbourhoods with good quality new homes that maintain and enhance a healthy local community, improve living standards and create safe environments.

Estates Vision

Having regard to the overarching vision and also the particular characteristics of each estate the vision for each estate is as follows:

A) **Eastfields** - Contemporary Compact Neighbourhood

A new neighbourhood which recognises the existing estate's experimental design and maintains a distinctive character through the creation of a contemporary architectural style encompassing a variety of types, sizes and heights for new homes overlooking traditional streets and the improvement of links to the surrounding area.

B) **High Path** - New London Vernacular

The creation of a new neighbourhood with traditional streets and improved links to its surroundings, that supports the existing local economy while drawing on the surrounding area's diverse heritage and strong sense of community. Buildings will be of a consistent design, form and character, using land efficiently to make the most of good transport services and create -and good internal design and access to quality amenity space.

C) **Ravensbury** - Suburban Parkland Setting

The creation of a new neighbourhood that is part of the wider parkland and which protects and enhances landscape quality and biodiversity. Characterised by buildings arranged as traditional streets and spaces that improve links to the surrounding area, allow for the landscape to penetrate the site whilst simultaneously improving flood mitigation and increasing the number of homes whilst retaining the character of its suburban parkland setting.

Justification

Visions have been produced for the Plan and individual estates. Their aim is to provide a high level guide to the general way in which the council expects to see the estates developed. This is based on the prevailing local context of each estate, the historical analysis and site analysis contained in the appendices as well as an analysis of good practice in urban design, architecture and regeneration.

It is considered important that there is a strong guiding theme for the regeneration of each estate given the long period of regeneration. The long period of building the original High Path estate shows what can happen when there is no high level design guidance and strategy. This has led to completely different styles of planning, design and architecture that have created a fragmented and incoherent environment. It is also important that the visions allow for flexibility of architectural expression and it is expected that differing architectural styles can and should be employed within each estate over the period of regeneration.

Proposals for the estates will be expected to show how they have had regard to the visions and what their interpretation of this means in terms of their proposals. This is most appropriate to show in outline applications for the whole estate. However, this will still need to be shown in the detailed applications that follow.

The diagram on page XX shows how the visions relate to the planning and wider policy context. The images on pages XX show, for each estate show good examples of recent and planned contemporary development that is considered of high quality and appropriate in form, style and scale for the estates. This is not exhaustive, but should serve as a good guide for applicants and architects. These images demonstrate the scope for variety within each Vision.

The diagrams on pages XX that follow are composites of the individual diagrams accompanying the site specific policies found in Part XX. These constitute the 'Vision Diagram' for each estate. Keys to the content of the diagrams accompany the individual policy diagrams in Part XX.

The images and diagrams referred to above constitute part of the justification statement for this policy OEP 1.

Alteration to vision images on pages 30, 32 & 34

Alter the text at the bottom of the pages as shown below and place them at the top of the page below the vision statement. Example shown below:

Eastfields: Contemporary Compact Neighbourhood - Inspiration

The ~~above~~ images **below** are exemplar examples of existing and proposed residential developments in the UK which have informed the Council's design aspirations for each estate. **These should be used as a guide and inspiration for what the Council expects to see built, in terms of quality, form, style appearance and scale.**

Alteration to vision diagrams on pages 31, 33 & 35

Insert a title for the diagrams at the top of the page with explanation. Put reference to key with this at top of page: Example shown below:

Eastfields: Vision Diagram

This diagram constitutes the vision diagram for the Eastfields estate. It is a composite of the diagrams accompanying the site specific policies in Part XX. This is the visual representation of the vision and policies for the Eastfields estate. For the key, please refer to individual policy diagrams.

OEP 2 Strategy

Over a 10-15 year period, the creation of sustainable well designed safe neighbourhoods with good quality new homes for Eastfields (Mitcham); High Path (South Wimbledon) and Ravensbury (Mitcham / Morden) will be achieved by ensuring that development proposals:

- A) Are in compliance with the Statutory Development Plan, of which the Estates Local Plan forms part of;
- B) Consist of a single linked regeneration programme for Eastfields, High Path and Ravensbury;
- C) For Eastfields and High Path set out regeneration of the whole estate and partial regeneration of Ravensbury estate;
- D) Will be expected to include phasing plans with details of build phase dates for each regeneration site.

S106 planning obligations and Community Infrastructure Levy (CIL) will be used by the council to mitigate the impact of development and to ensure the delivery of key infrastructure.

Justification

(this is para 2.26) The Estates Local Plan is part of the Statutory Development Plan which consists of the London Plan, Merton's Core Planning Strategy, Merton's Sites and Policies Plan, Merton's Sites and Policies Map and the South London Waste Plan. Collectively these documents help to deliver Merton's planning objectives which are:-

- To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- To promote social cohesion and tackle deprivation by reducing inequalities
- To provide new homes and infrastructure within Merton's town Centre and residential areas through physical regeneration and the effective use of space
- To make Merton more prosperous with strong and diverse long – term economic growth
- To make Merton a healthier and better place for people to live, work in or visit.
- To make Merton an exemplarily borough in mitigating and adapting to climate change and to make it a more attractive and green space
- To make Merton a well connected place where walking cycling and public transport are the modes of choice when planning all journeys
- To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough.

(this is para 2.21) The Estates Local Plan primarily guides how new homes will be delivered via a coordinated strategy considering the social economic and environmental opportunities an impact of growth and provides the framework for sustainable development of these areas. The regeneration of all three estates as part of a single comprehensive programme has been presented to the council as the basis of being able to viably deliver regeneration and it is on this basis that the council is considering the deliverability of the Estates Local Plan.

(para 2.29) The proposed regeneration of the whole of High Path and Eastfields estate and the partial regeneration of Ravensbury Estate is based on a suite of evidence provided by Clarion Housing group which included:-

- The Case for Regeneration
- Housing Needs Study
- Socio – economic analysis
- Stock Condition Analysis
- Urban Design studies
- Visual Impact studies

(para 2.32) A key expectation of any regeneration proposal that comes forward will be a commitment to keeping the existing community together in each neighbourhood and for existing residents to have a guaranteed right to return to a new home in their regeneration neighbourhood.

(this is part of para 5.7 and sets up the response to Inspectors question Matter 1 Question 10) The SA/SEA have identified phasing and implementation as critical elements in minimising the disruption to existing residents as far as possible.

MA2

POLICY OEP3 - Urban Design

a) Development proposals will be expected to adhere to all of the principles listed below to ensure that they achieve the highest standards of design, accessibility and inclusive design:

- **Perimeter blocks:** Buildings should be arranged so that the fronts face outwards, towards the street;
- **Active frontages:** Building entrances and windows onto the street should be maximised;
- **Building lines:** Boundaries should clearly define the fronts of buildings, create spaces and define routes
- **Open space:** Public and communal open space should be provided;
- **Defensible space:** The transition from public to private space should be understandable and clearly defined;
- **Promoting biodiversity:** Promoting the variety of plants, animals and other living things found in an area;
- **Inclusive and active design:** Development proposals should encompass the needs of everyone and provide opportunities for healthy and active lifestyle choices
- **Promoting sustainable development:** Promoting the efficient use of resources that does not prejudice future generations from meeting their own needs;
- **Density:** Using high quality design to determine an appropriate density for an area;
- **Permeable, legible and accessible layouts:** Arrangement of streets and buildings that offer a convenient choice of routes that are easy to understand.
- **Parking provision:** Vehicular parking that is provided on-street as a first choice, well managed and integrated into the rest of the street;
- **Local context (buildings, materials interpretation, art):** Using local good quality design to inform the design and appearance of new development

b) Design Review must be embedded into the development process for the regeneration of the estates. Masterplans and proposals for all phases of development on each estate must be reviewed at least once by the Council's Design Review Panel.

Justification

This policy outlines a set of broad design principles. *Applications must demonstrate adherence to these principles in order to be in accordance with paras. 57, 58, 61 and 69 of the NPPF, in accordance with Policy 7.2 of the London Plan and in accordance with Policy DM D1 of the Merton Sites and Policies Plan*

All development proposals will be expected to adhere to these principles in order to achieve the highest standards of design, accessibility and inclusive design.

The Equality Act 2010 describes a disability as a physical or mental impairment which has a substantial and long-term adverse effect on one's ability to carry out normal day-to-day activities. All development proposals will be expected to have consideration to people with disabilities as defined by the Equality Act. This includes physical and mental conditions - for example, dementia. Full definitions of the terms used for the principles can be found in the Glossary.

Perimeter blocks

New development will be expected to be built using the principle of perimeter blocks. This is where the public entrances to buildings face the streets and the more private elements are less visible and accessible to the rear. Perimeter blocks are a flexible approach to development and need not create a uniform layout. This approach creates a strong and easy to understand layout. Importantly, it also creates a clear arrangement of public and private space that builds in natural surveillance and security.

Active frontages

New development must be designed to have buildings with entrances and windows facing the street (active frontages) and should avoid blank walls or gable ends. This provides long term flexibility of buildings, creating activity and vibrancy in commercial areas and supporting a level of activity on quieter streets to create a good level of natural surveillance to deter criminal activity. This is particularly relevant to ground floor frontages, where maximising windows and doors is particularly important. In commercial frontages, views into shops and businesses, whether open or closed is also important.

Building lines

New development must connect easily with the surrounding area and be easy to get around, not present barriers. Traditional streets with buildings lining each side of the street, will contribute to defining spaces and the creation of clearly defined routes. Irregular building lines and building heights undermine this and should therefore be avoided.

Landscaping

All private, communal and public amenity space must be of a high quality of design, attractive, usable, fit for purpose and meet all policy requirements, including addressing issues of appropriate facilities, replacement space or identified shortfall. High quality designed amenity space will have good levels of privacy or public surveillance depending on their purpose and generally have an open aspect, good sun/ daylighting, be of a single regular shape and have easy and convenient access for all potential users.

Defensible space

Defensible space is the area or feature that separates the street and the buildings accessed from it. This space functions as a clearly understandable transition, or buffer zone, from public street to the private building, ensuring a good level of natural surveillance between street and building, as well as a degree of privacy. It is important in creating successful perimeter blocks and buildings with entrances and windows facing the street (active frontages) and no blank walls or gable ends. New development will be required to ensure all

buildings fronting onto streets have successfully designed defensible space that is appropriate to the uses in the buildings.

Promoting biodiversity

Development proposals should incorporate and promote biodiversity, through open space, street trees, green chains, SuDs and a variety of other means, including those more directly related to mitigating the effects of climate change. Biodiversity also adds visual attractiveness and local distinctiveness, and can also provide recreational facilities.

Promoting inclusive and active design

The design of new development and streets must promote Inclusive and Active Design. This approach will ensure that the development includes local facilities that are easily accessible and create good quality, well maintained and safe places with convenient and direct routes throughout the development. Development proposals should demonstrate how the principles in the GLA's Accessible London: Achieving an Inclusive Environment SPG has been incorporated into the development proposals. The public realm should be designed to facilitate low vehicle speeds and reduced vehicle dominance. Active Design provides opportunities for everyone to be naturally active as part of their daily life, and so improves health and wellbeing.

Promoting sustainable development

New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy. Such principles can include use of energy efficient building materials, appropriate design and construction methods and use of low-carbon technologies and renewable energy generation. New development should be sustainable in terms of supporting local social and economic development to support community development, for example by making use of sustainable travel modes the first choice, encouraging community based car sharing schemes and facilitating improved health and wellbeing such as enabling local food growing and are encouraged to implement aims set out by the Merton Food Charter.

Permeable, legible and accessible layouts

New development should connect easily with surrounding neighbourhoods and not be seen as a separate place or result in restricted access. New neighbourhoods must be easy and convenient to get around, and be accessible for all users. Streets must be safe and look like they lead somewhere, be clearly and visibly connected to other streets. Well connected street layouts should encourage walking and cycling as well as allowing for convenient and clear vehicular access.

Density

The London Plan Density Matrix should be used flexibly with other relevant criteria to determine an appropriate density for each estate that ensures high quality design. Development that is too dense or poorly designed may result in cramped internal layouts, overlooking or daylight issues, or a high number of single (or nearly single) aspect dwellings. Development that is not dense enough will not use land efficiently and effectively or provide sufficient good quality homes.

Parking provision

On street provision is the preferred option for vehicle parking. It is essential that on-street vehicle and cycle parking is well-designed, well managed and integrated into the rest of the street. On-street parking creates activity, vitality and ensures a good level of natural surveillance. Only when on-street provision cannot accommodate all parking needs should other methods of parking be used. All methods of parking provision should be of a high quality design that is attractive, convenient and safe for people, bikes and vehicles. The council applies the parking standards set out in the Mayor's London Plan and reference should also be made to the London Housing SPG and subsequent updates.

Local context (buildings, materials interpretation, art)

The design, layout and appearance of new development should take inspiration and ideas from the positive elements of the local built, natural and historic context. Development proposals should include an analysis of what local characteristics are relevant and why, and which are less so. Opportunity must be taken to strengthen local character by drawing on its positive characteristics

Design Review

Design Review is a well-established method of improving the quality of design in the built environment. It is recognised in the National Planning Policy Framework (NPPF) (para.62, page 15). Design Review is an independent and impartial evaluation process in which a panel of experts on the built environment assess the design of a proposal. Proposals relating to the whole or phases of the three estates must be reviewed at least once, ideally at pre-application stage, by Merton Council's Design Review Panel www.merton.gov.uk/designreviewpanel Depending on the significance of the proposal, applicants may want to consider other design reviews such as Urban Design London or the Mayor of London to help guide and improve their schemes..

MA69

New Appendix 4 to Estates Local Plan

Table 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. Please note that this is not exhaustive.

Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
Eastfields General		CS2 - Mitcham Sub Area.	CMH2 - Housing Mix, DMH3 - Support for Affordable Housing, DMH1 - Supported Care Housing For Vulnerable People or Secure Residential Institutions For People Housed As Part Of The Criminal Justice System.
EP E1 Townscape	3.5 - Quality and Design of Housing Developments, 3.7 - Large Residential Developments.		
EP E2 Street Network	6.9 - Cycling, 6.10 - Walking, 6.13 - Parking, 6.12 - Road Network.		

Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
EP E3 Movement and Access	2.8 Outer London: Transport, 6.3 - Assessing Effects of Development on Transport Capacity, 6.9 - Cycling, 6.10 - Walking, 6.13 - Parking, 6.12 - Road Network Capacity, 7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Soundscapes.	CS18 - Active Transport, CS19 - Public Transport, CS20 - Parking Servicing and Delivery.	DMT1 - Support for Sustainable Transport and Active Travel, DMT2 - Transport Impacts of Development, DMT3 - Car Parking and Servicing Standards, DMT4 - Transport Infrastructure, DMT5 - Access to the Road Network, DMEP2 - Reducing and Mitigating Noise, DMEP4 - Pollutants Transport Proposals - 01TN, 22TN and 18TN.
EP E4 Land Use	3.3 - Increasing Housing Supply, 3.4 - Optimising Housing Potential, 3.5 - Quality and Design of Housing Developments, 3.7 - Large Residential Developments, 3.8 - Housing Choice, 3.10 - Definition of Affordable Housing, 3.11 - Affordable Housing Targets, 3.12 - Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes, 3.13 - Affordable Housing Thresholds, 3.14 - Existing Housing, 3.15 - Coordination of Housing Development and Investment. Housing SPG (2016), Draft Affordable Housing and Viability SPG	CS2 - Mitcham Sub Area CS8 Housing Choice, CS9 Housing Provision, CS14 Design	

Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
	<p>(2017), Housing Standards Policy Transition Statement. Draft Interim Housing SPG (2015), Affordable Housing and Viability (2016), Character and Context SPG (2014) .</p>		
<p>EP E5 Open Space</p>	<p>3.2 - Improving Health and Addressing Health Inequalities, 3.6 - Children and Young Peoples Plan and Informal Recreation Facilities, 3.9 - Mixed and Balanced Communities, 3.16 - Protection and Enhancement of Social Infrastructure, 3.17 - Health and Social Care Facilities, 3.18 - Educational Facilities, 3.19 - Sports Facilities, 5.10 - Urban Greening Policy, 7.17 - Metropolitan Open Land, 7.18 - Protecting Open Space and Addressing Deficiency, 7.19 - Biodiversity and Access to Nature. Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).</p>	<p>CS11 - Infrastructure, CS13 - Open Space, Nature Conservation, Leisure and Culture.</p>	<p>DMO1 - Open Space DMO2 - Nature Conservation and Leisure DMC1 - Community Facilities, DMC2 - Education for Children and Young People.</p>

Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
EP E6 Environmental Protection	5.1 - Climate Change Mitigation, 5.2 - Minimising Carbon Dioxide Emissions, 5.3 - Sustainable Design and Construction, 5.6 - Decentralised Energy in Development Proposals, 5.7 - Renewable Energy, 5.9 - Overheating and Cooling, 5.11- Green Roofs and Development Site Environs, 5.12 - Flood Risk Management, 5.13 - Sustainable Drainage, 5.14 - Water Quality and Wastewater Infrastructure, 5.15 - Water Use and Supplies, 5.18 - Construction , Excavation and Demolition Waste, 5.21 - Land Contamination, 7.14 - Improving Air Quality, 7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes.	CS11 - Infrastructure Policy, CS16 - Flood Risk Management, CS 15 - Climate Change, CS17 - Waste Management, DMF2 - Sustainable Urban Drainage Systems (SUDS) and Wastewater and Water Infrastructure, DMEP2 - Reducing Mitigating Against Noise, DMEP4 - Pollutants (Air, Land, Contamination, Water).	DMEP1 Opportunities for Decentralised Energy Networks, DM EP3 Allowable Solutions, DM H4 Demolition and Redevelopment of A Single Dwelling House. DMF1 Support For Flood Risk Management, DM F2 sustainabel Urban Drainabge Systemns (SUDS) and Wastewater And Water Infrastructure.
EP E7 Landscape	5.10 - Urban Greening Policy, 7.5 - Public Ream, 7.8 - Heritage Assets and Archaeology.		
EP E8 Building Heights	7.1 - Lifetime Neighbourhoods, 7.2 - An Inclusive Environment, 7.3 - Designing Out Crime, 7.6 - Architecture, 7.7 - Location and Design of Tall and Large Development, 7.8 - Heritage Assets and	CS14 Design.	DMD1 - Urban Design and Public Realm, DMD2 - Design Considerations in All Developments, DMD3 - Alterations to Existing Buildings , DMD4 - Managing

Estates Local Plan	London Plan	Core Planning Strategy	Sites and Policies Plan
	Archeology 7.13 - Safety, Security and Resilience to Emergency. London Plan Table 3.2 Density and Table 3.3 Housign Standards, Interim London Housing Design Guide (2010) Housing SPG (2016).		Heritage Assests, DMD7 - Shop Front Design and Signage.
High Path General	2.6 - Outer London Vision and Strategy, 2.13 - Opportunity Areas and Intensification Areas. Town Centres (SPG 2014), South Wimbledon/ Colliers Wood designated in London Plan as an AFI.	CS1 - Colliers Wood / South Wimbledon Sub Area.	
EP H1 Townscape	3.5 - Quality and Design of Housing Developments, 3.7 - Large Residential Developments.	CS1 - Colliers Wood / South Wimbledon Sub Area.	
EP H2 Street Network	6.9 - Cycling, 6.10 - Walking, 6.13 - Parking, 6.12 - Road Network.		
EP H3 Movement and Access	2.8 Outer London: Transport, 6.3 - Assessing Effects of Development on Transport Capacity, 6.9 - Cycling, 6.10 - Walking, 6.13 - Parking, 6.12 - Road Network Capacity, 7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Soundscapes.	CS18 - Active Transport, CS19 - Public Transport, CS20 - Parking Servicing and Delivery.	DMT1 - Support for Sustainable Transport and Active Travel, DMT2 - Transport Impacts of Development, DMT3 - Car Parking and Servicing Standards, DMT4 - Transport Infrastrucure, DMT5 - Access to the Road Network, DMEP2 - Reducing

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			and Mitigating Noise, DMEP4 - Pollutants Transport Proposals - 01TN, 22TN and 18TN.
EP H4 Land Use	3.3 - Increasing Housing Supply, 3.4 - Optimising Housing Potential, 3.5 - Quality and Design of Housing Developments, 3.7 - Large Residential Developments, 3.8 - Housing Choice, 3.10 - Definition of Affordable Housing, 3.11 - Affordable Housing Targets, 3.12 - Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes, 3.13 - Affordable Housing Thresholds, 3.14 - Existing Housing, 3.15 - Coordination of Housing Development and Investment. Housing SPG (2016), Draft Affordable Housing and Viability SPG (2017), Housing Standards Policy Transition Statement. Draft Interim Housing SPG (2015), Affordable Housing and Viability (2016), Character and Context SPG (2014) .	CS2 - Mitcham Sub Area CS8 Housing Choice, CS9 Housing Provision , CS14 Design	

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EP H5 Open Space	3.2 - Improving Health and Addressing Health Inequalities, 3.6 - Children and Young Peoples Plan and Informal Recreation Facilities, 3.9 - Mixed and Balanced Communities, 3.16 - Protection and Enhancement of Social Infrastructure, 3.17 - Health and Social Care Facilities, 3.18 - Educational Facilities, 3.19 - Sports Facilities, 5.10 - Urban Greening Policy, 7.17 - Metropolitan Open Land, 7.18 - Protecting Open Space and Addressing Deficiency, 7.19 - Biodiversity and Access to Nature. Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).	CS11 - Infrastructure Policie, CS13 - Open Space, Nature Conservation, Leisure and Culture.	DMO1 - Open Space DMO2 - Nature Conservation and Leisure DMC1 - Community Facilities, DMC2 - Education for Children and Young People.
EP H6 Environmental Protection	5.1 - Climate Change Mitigation, 5.2 - Minimising Carbon Dioxide Emissions, 5.3 - Sustainable Design and Construction, 5.6 - Decentralised Energy in Development Proposals, 5.7 - Renewable Energy, 5.9 - Overheating and Cooling, 5.11- Green Roofs and Development Site Environs, 5.12 - Flood Risk Management, 5.13 - Sustainable Drainage, 5.14 - Water Quality and Wastewater Infrastructure, 5.15 -	CS11 - Infrastructure Policy, CS16 - Flood Risk Management, CS 15 - Climate Change, CS17 - Waste Management, DMF2 - Sustainable Urban Drainage Systems (SUDS) and Wastewater Infrastructure, DMEP2 - Reducing	DMEP1 Opportunities for Decentralised Energy Networks DM EP3 Allowable Solutions, DM H4 Demolition and Redevelopment of A Single Dwelling House. DMF1 Support For Flood Risk Management, DM F2 sustainabel Urban Drainabge Systemns (SUDS) and Wastewater And Water Infrastructure.

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	Water Use and Supplies, 5.18 - Construction , Excavation and Demolition Waste, 5.21 - Land Contamination, 7.14 - Improving Air Quality, 7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes.	Mitigating Against Noise, DMEP4 - Pollutants (Air, Land, Contamination, Water).	
EP H7 Landscape	5.10 - Urban Greening Policy, 7.5 - Public Realm, 7.8 - Heritage Assets and Archaeology.		
EP H8 Building Heights	7.1 - Lifetime Neighbourhoods, 7.2 - An Inclusive Environment, 7.3 - Designing Out Crime, 7.6 - Architecture, 7.7 - Location and Design of Tall and Large Development, 7.8 - Heritage Assets and Archeology 7.13 - Safety, Security and Resilience to Emergency. London Plan Table 3.2 Density and Table 3.3 Housign Standards, Interim London Housing Design Guide (2010) Housing SPG (2016).	CS14 Design.	DMD1 - Urban Design and Public Realm, DMD2 - Design Considerations in All Developments, DMD3 - Alterations to Existing Buildings , DMD4 - Managing Heritage Assests, DMD7 - Shop Front Design and Signage.
Ravensbury General		CS 3 Morden Sub Area	
EP R1 Townscape	3.5 - Quality and Design of Housing Developments, 3.7 - Large Residential Developments.		

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EP R2 Street Network	6.9 - Cycling, 6.10 - Walking, 6.13 - Parking, 6.12 - Road Network.		
EP R3 Movement and Access	2.8 Outer London: Transport, 6.3 - Assessing Effects of Development on Transport Capacity, 6.9 - Cycling, 6.10 - Walking, 6.13 - Parking, 6.12 - Road Network Capacity, 7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Soundscapes.		DMT1 - Support for Sustainable Transport and Active Travel, DMT2 - Transport Impacts of Development, DMT3 - Car Parking and Servicing Standards, DMT4 - Transport Infrastructure, DMT5 - Access to the Road Network, DMEP2 - Reducing and Mitigating Noise, DMEP4 - Pollutants Transport Proposals - 01TN, 22TN and 18TN.
EP R4 Land Use	3.3 - Increasing Housing Supply, 3.4 - Optimising Housing Potential, 3.5 - Quality and Design of Housing Developments, 3.7 - Large Residential Developments, 3.8 - Housing Choice, 3.10 - Definition of Affordable Housing, 3.11 - Affordable Housing Targets, 3.12 - Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes, 3.13 - Affordable Housing Thresholds, 3.14 - Existing Housing, 3.15 - Coordination of Housing Development and	CS 3 Morden Sub Area, DM D3 Alterations To Extensions To Existing Buildings	

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	<p>Investment. Housing SPG (2016), Draft Affordable Housing and Viability SPG (2017), Housing Standards Policy Transition Statement. Draft Interim Housing SPG (2015), Affordable Housing and Viability (2016), Character and Context SPG (2014) .</p>		
<p>EP R5 Open Space</p>	<p>3.2 - Improving Health and Addressing Health Inequalities, 3.6 - Children and Young Peoples Plan and Informal Recreation Facilities, 3.9 - Mixed and Balanced Communities, 3.16 - Protection and Enhancement of Social Infrastructure, 3.17 - Health and Social Care Facilities, 3.18 - Educational Facilities, 3.19 - Sports Facilities, 5.10 - Urban Greening Policy, 7.17 - Metropolitan Open Land, 7.18 - Protecting Open Space and Addressing Deficiency, 7.19 - Biodiversity and Access to Nature. Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).</p>	<p>CS11 - Infrastructure Policies, CS13 - Open Space, Nature Conservation, Leisure and Culture.</p>	<p>DMO1 - Open Space DMO2 - Nature Conservation and Leisure DMC1 - Community Facilities, DMC2 - Education for Children and Young People.</p>

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EP R6 Environmental Protection	5.1 - Climate Change Mitigation, 5.2 - Minimising Carbon Dioxide Emissions, 5.3 - Sustainable Design and Construction, 5.6 - Decentralised Energy in Development Proposals, 5.7 - Renewable Energy, 5.9 - Overheating and Cooling, 5.11- Green Roofs and Development Site Environs, 5.12 - Flood Risk Management, 5.13 - Sustainable Drainage, 5.14 - Water Quality and Wastewater Infrastructure, 5.15 - Water Use and Supplies, 5.18 - Construction , Excavation and Demolition Waste, 5.21 - Land Contamination, 7.14 - Improving Air Quality, 7.15 - Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes.	CS11 - Infrastructure Policy, CS16 - Flood Risk Management, CS 15 - Climate Change, CS17 - Waste Management, DMF2 - Sustainable Urban Drainage Systems (SUDS) and Wastewater and Water Infrastructure, DMEP2 - Reducing Mitigating Against Noise, DMEP4 - Pollutants (Air, Land, Contamination, Water).	DMEP1 Opportunities for Decentralised Energy Networks DM EP3 Allowable Solutions, DM H4 Demolition and Redevelopment of A Single Dwelling House. DMF1 Support For Flood Risk Management, DM F2 sustainabel Urban Drainabge Systemns (SUDS) and Wastewater And Water Infrastructure.
EP R7 Landscape	5.10 - Urban Greening Policy, 7.5 - Public Ream, 7.8 - Heritage Assets and Archaeology.		
EP R8 Building Heights	7.1 - Lifetime Neighbourhoods, 7.2 - An Inclusive Environment, 7.3 - Designing Out Crime, 7.6 - Architecture, 7.7 - Location and Design of Tall and Large Development, 7.8 - Heritage Assets and	CS14 Design.	DMD1 - Urban Design and Public Realm, DMD2 - Design Considerations in All Developments, DMD3 - Alterations to Existing Buildings , DMD4 - Managing

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	Archeology 7.13 - Safety, Security and Resilience to Emergency. London Plan Table 3.2 Density and Table 3.3 Housign Standards, Interim London Housing Design Guide (2010) Housing SPG (2016).		Heritage Assests, DMD7 - Shop Front Design and Signage.