London Borough of Merton
Pre-Submission Estates Local Plan
Stage 3 Consultation 8th December 2016 - 3rd February 2017
www.merton.gov.uk
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Estates Local Plan – Stage 3 Pre-Submission Publication Estates Local Plan

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Contents

Foreword 6

01 Introduction
Estates Local Plan - third consultation 8

02 Background
Background 12
Key drivers 18
The case for regeneration 22
The vision 28
Urban design principles 36

03 Analysis and planning policies
Introduction to Part 03 42

Eastfields
Eastfields location 46
Eastfields site analysis 48
Eastfields issues and opportunities 59
Eastfields site specific policies 62

High Path
High Path location 84
High Path site analysis 86
High Path issues and opportunities 101
High Path site specific policies 104
Ravensbury
Ravensbury location 132
Ravensbury site analysis 134
Ravensbury issues and opportunities 147
Ravensbury site specific policies 150

04 Design requirements for planning applications
Design requirements for planning applications 176

05 Delivery, Implementation and Monitoring
Delivery, Implementation and Monitoring 182

Appendices

Appendix 1: Review of the Estates Local Plan against Merton’s core planning strategy objectives 194
Appendix 2: Area deficient in access to local open space maps 196
Appendix 3: Historical context - Eastfields, High Path and Ravensbury 200

Glossary 214
These are exciting times for Merton. The Estates Local Plan provides a framework to guide the ambitious and welcomed regeneration of Eastfields, High Path and Ravensbury neighbourhoods over the next 15 years. This project represents a significant long-term investment and throughout this project to date we have, in accordance with the promises known as the ‘10 commitments’ to residents, continued to look out for our residents as we have always been determined that residents should be at the heart of the regeneration project. We consider that regeneration provides the best deal for our residents.

Comprehensive well planned regeneration of Eastfields, High Path and Ravensbury estates is considered a better option than the continued piecemeal renovations to maintain the Decent Homes Standards. Regeneration will not only see the three estates transformed with new high quality energy efficient homes for existing residents that are easier and cheaper to heat, but also deliver over 1,000 much needed new homes.

An important aspect of the development of the Estates Local Plan is the invaluable input we received from residents and community groups who are keen to have a hand in shaping the guiding framework. Our consultations drew many comments and ideas which we have tried to include in the final version.

We recognise that a key aim of regeneration of the three estates is to provide sustainable communities through the creation of new well designed high quality neighbourhoods aimed at fundamentally improving the quality of life and life chances for existing and future generations living in the area. The Estates Local Plan, ensures that for years to come, there will be a sound and consistent approach to guiding regeneration of Eastfields, High Path and Ravensbury, to ensure a bright future for these neighbourhoods.

Councillor Martin Whelton
Cabinet Member for Regeneration, Environment and Housing
Rediscover Mitcham - Mitcham clocktower (restoration 2016)
a great place to live and call home, where citizens are also neighbours and take responsibility for improving their own lives and neighbourhoods

Merton’s Sustainable Community Strategy (2009-2019)
Estates Local Plan – Pre-submission publication

Pre-submission publication stage: December 2016 – February 2017

Part of Merton’s Local Plan

What is the Estates Local Plan?

1.1 The Estates Local Plan is a legal document prepared by the council to help guide what could be built and assess planning applications for three estates in Merton. Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Mitcham / Morden).

• Part 2 outlines the background to the document. It sets out its relationship to other plans and policies, the key drivers for the Plan, the case for regeneration, the overall design principles and the council’s vision for each of these new neighbourhoods. It also defines the geographic area where the Plan applies, known as the Policies Map.

• Part 3, the main part of the document, looks at each of the three estate neighbourhood in turn. It proposes a set of detailed policies to guide development. This is based on a detailed site analysis of the current neighbourhoods and a study of the historical context (appendix 3) of the three estates.

• Part 4 sets out detailed design requirements for planning applications to enable the delivery of site specific policies and ensure design consistency across each estate. The plan ends by outlining how the plan will be delivered and implemented.

1.2 The Sustainability Appraisal / Strategic Environmental Assessment published alongside the Estates Local Plan demonstrates how the Plan has been informed by social, environmental and economic criteria as it has been created. This ensures that the final plan will facilitate sustainable development.

What has happened so far?

Two stage of consultation have already taken place in developing the Estates Local Plan:

Stage 1 – Issues and Options Consultation (September – November 2014)

1.3 This initial stage asked people and organisations living within or near the three estates what they thought the draft Estates Local Plan should cover and what were the priorities for their neighbourhoods. Everybody’s response to this consultation is available online on Merton Council’s website here:

www.merton.gov.uk/estatesplan

1.4 During 2015 we considered all the responses received, carried out research and created a draft Estates Local Plan with new detailed planning policies and land designation which could guide regeneration proposals.

1.5 During 2015 Clarion Housing Group consulted residents within the estates on their “resident’s offer” and on the type, size and style of developments they were proposing.

Stage 2 – Draft Estates Local Plan ( February – March 2016)

1.6 This consultation gave residents within and near the estates, community groups and other interested parties the opportunity to view and comment on the council’s detailed plans for each of the three estates. This stage also gave people and organisations the opportunity to view and comment on Clarion Housing Group’s case for regeneration and other background research undertaken on each of the three estates.

1.7 A large range and number of comments were received from residents, landowners, community groups and other interested parties.
1.8 The Estates Local Plan, sustainability appraisal and research, together with everybody’s responses to this consultation, are available via Merton Council’s website here:

www.merton.gov.uk/estatesplan

What has happened to my comments?

1.9 Thanks to everyone who took the time to respond to the two earlier consultations on the Estates Local Plan.

1.10 Your comments have helped to inform the policies and maps in the Estates Local Plan. This document has been informed by your feedback, local research, national and regional planning policies.

1.11 A statement of consultation is published with this plan, summarising all of the comments received and what changes have been made as a result.

What is happening now?

1.12 The council believes that this document is the right plan for Eastfields, High Path and Ravensbury and wishes to adopt it as part of the council’s Local Plan. Before doing this, the council has to submit it to the Secretary of State for examination by an independent planning inspector.

1.13 If you have comments on this document or its sustainability appraisal, including the detailed policies, land designations for each or any of the three estates that you would like the inspector to consider at his or her independent examination of the plan, please let us know in writing (by post or email) between 8th December 2016 and 3rd February 2017.

estatesplan@merton.gov.uk

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1.14 Please also tell the inspector if you would like to participate in the examination hearings on Merton’s Estates Local Plan or if you would like to be notified when this document is adopted.
Part 02
Background
Background

2.1 The Estates Local Plan covers three existing housing estates within Merton: Eastfields (Mitcham); High Path (South Wimbledon) and Ravensbury (Morden / Mitcham). In March 2010 the council transferred its social housing stock including the homes it owned on the three estates to Clarion Housing Group. The Stock Transfer Agreement including a legal obligation for Clarion Housing Group to undertake a programme of property improvements known as Decent Homes and these are underway across the transferred housing stock.

2.2 However in preparing the plans to undertake these works across homes in Merton, Clarion Housing Group came to doubt the case for investing in what Clarion Housing Group regard in some instances as homes and neighbourhoods of a poor standard. In 2013 Clarion Housing Group started exploring regeneration-based alternatives to improving the quality of homes and neighbourhoods in Eastfields, High Path and Ravensbury and since then have consulted residents on the development of their masterplans and the offer to existing residents living on the estates.

2.3 Since 2014 the council has been exploring the regeneration of these three estates in consultation with residents, the Mayor of London’s office, Clarion Housing Group, Transport for London and other interested parties. As well as engagement, we have analysed the evidence carried out by Clarion Housing Group to support the case for regeneration. The 10 Commitments signed between the council and Clarion Housing Group have formed the backbone of this project to ensure residents remain at the heart of decision-making. The council has now concluded that the regeneration of these estates should be supported.

2.4 This Estates Local Plan is an essential tool in shaping and managing the redevelopment process of Eastfields, High Path and Ravensbury to create new, well-designed, high quality neighbourhoods aimed at fundamentally improving the quality of life for existing and future generations living in the area.

2.5 The Plan’s purpose is to guide any redevelopment proposals for the three estates that come forward within the next 10-15 years. This Plan is wholly design-led and pitched at a high level; specific building details will be developed by applicants such as Clarion Housing Group and determined by the council through the planning application process.
- LBM first draft consultation
- Review feedback
- LBM decide on regeneration option
- Publication of final plan for Inspector
- Submission to Planning Inspector
- to agree pending Clarion Housing Group Boards sign off
- Clarion Housing Group Planning Application
What informs the Estates Local Plan?

Producing Merton’s Estates Local Plan – what people told us

2.6 The responses from consultees, particularly existing residents on the three estates, are crucial to the development of the Estates Local Plan. From the engagement undertaking between 2014 and 2016 (described in the first section of this document and available online), we have prepared a report of consultation setting out a summary of what people told us and how this influenced the drafting of the Estates Local Plan. Everybody’s responses are published online (with personal details removed).

Presumption in favour of sustainable development

2.7 When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

2.8 Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

2.9 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

- Specific policies in that Framework indicate that development should be restricted.
Appraising the Estates Local Plan for sustainability

2.10 Government legislation requires development plan documents to be appraised for sustainability. This helps to promote sustainable development by ensuring that the optimal balance of positive social, environmental and economic outcomes are integrated into the Plan; this is known as a “Sustainability Appraisal”.

2.11 In accordance with an EU Directive, councils are required to undertake Strategic Environmental Assessments of new plans. Government guidance allows both assessments to be combined. An assessment of the Estates Local Plan has been carried out which integrates both a Sustainability Appraisal and a Strategic Environmental Assessment and is referred to by the single term “Sustainability appraisal”. Merton’s Estates Local Plan Sustainability Appraisal Report 2016 contains the full assessment of the policies and proposals in the Estates Local Plan.

Health and wellbeing

2.12 A health impact assessment has been carried out for the Estates Local Plan to help ensure that health and wellbeing are being properly considered in producing and delivering the Estates Local Plan. It helps to ensure the Plan delivers sustainable development by identifying the key health and wellbeing issues for the areas and the groups that are likely to be affected by the implementation of the plan. Like the Sustainability Appraisal, the health impact assessment is an important tool in developing sound planning policies and assesses each stage of the Estates Local Plan making process and its delivery.

Ensuring equality

2.13 An Equalities Impact Assessment of the Estates Local Plan has been undertaken to examine the impact of policies on certain groups, to help identify and combat discrimination and serve the needs of disadvantaged groups in the community.

Protecting the environment

2.14 There has also been an assessment of whether or not implementing the Estates Local Plan would have an adverse impact on nearby internationally important habitats including Wimbledon Common and Richmond Park. This is known as a Habitats Regulations Assessment screening exercise and is available with the Sustainability Appraisal of the Estates Local Plan.
Improving homes and neighbourhoods

2.15 Having well-designed energy efficient new homes in an attractive setting within easy access to services and facilities is at the heart of Merton’s Community Plan and the Mayor’s London Plan.

2.16 The Estates Local Plan supports the development of new homes to modern energy efficiency standards, helping to reduce residents’ fuel and repair bills.

2.17 The Estates Local Plan provides the opportunity to improve the building fabric, pavements and roads, drains, street lighting, parks and landscaping of each area, to create neighbourhoods that will last. The creation of new paths and streets within each estate and between the estates and the wider area will support well designed walkable neighbourhoods, make it easier for people to find their way around, enhance the feeling of safety and security, and integrate the estates into the wider community.

Delivering new homes

2.18 There is a substantial demand for new homes in London and the south east. Increasing the supply of new homes to meet housing needs is a longstanding and well documented policy driver for successive governments. The National Planning Policy Framework expects local authorities to boost significantly the supply of housing” (NPPF p.47) which is replicated by the Mayor of London and at a local level in Merton’s Core Planning Strategy. Merton’s share of London’s new homes is currently 411 new homes per year. The Estates Local Plan will help deliver new homes for existing and future residents, helping Merton to meet its share of London’s new homes of all types, sizes and tenures.

Delivering regeneration across all three estates

2.19 Regeneration of the three housing estates represents a significant investment in the borough and a rare opportunity to support substantial improvements to the building fabric and local surroundings of homes for existing residents at the same time as creating an attractive, well-connected neighbourhood and providing much needed new additional homes to help address the needs of future residents.

2.20 However the estates regeneration programme presents a particular opportunity for the smaller estates at Eastfields and Ravensbury for which regeneration is now financially viable when connected with High Path. The council has been presented with the opportunity to support the delivery of attractive viable regeneration proposals that might not otherwise go ahead, were the smaller estates expected to be viably regenerated to a high standard as stand-alone developments.

2.21 The Estates Local Plan primarily guides how new homes will be delivered via a co-ordinated strategy, considering the social, economic and environmental opportunities and impacts 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 for being able to viably deliver regeneration and it is on this basis that the council is considering the deliverability of the Estates Local Plan. Merton Council’s resolutions in July 2014 to explore regeneration via the creation of an Estates Local Plan, and in November 2016 to submit the Estates Local Plan to the Secretary of State have been made on the basis of the three estates being linked as part of a single regeneration programme.

2.22 The Estates Local Plan guides how new homes will be delivered via a co-ordinated strategy, considering the social, economic and environmental opportunities and impacts 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 for being able to viably deliver regeneration and it is on this basis that the council is considering the deliverability of the Estates Local Plan.
Delivering Merton’s Community Plan

2.23 Merton has a Sustainable Community Strategy which is also known as Merton’s Community Plan (2009-2019). It is developed and delivered by the Merton Partnership.

2.24 Merton Partnership is the overarching strategic partnership that seeks to place the needs of the community, the regeneration of the borough and the effective delivery of public services at the heart of what public agencies and their partners do. It is made up of Merton Council, the NHS (Clinical Commissioning Group), the Metropolitan Police, London Fire Brigade; Merton Chamber of Commerce, Merton Voluntary Services Council; BAME Voice; Jobcentre Plus, South Thames College; Merton Interfaith Forum; Clarion Housing Group; the two Members of Parliament covering Merton (Mitcham and Morden; Wimbledon); the GLA Member for Merton and Wandsworth.

2.25 The Estates Local Plan helps to deliver the long-term vision for the Community Plan, which is

“a great place to live and call home, where citizens are also neighbours and take responsibility for improving their own lives and neighbourhoods”
Key drivers

Delivering Merton’s Core Planning Strategy

2.26 The Estates Local Plan helps to deliver Merton’s Core Planning Strategy objectives:

- 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 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 exemplary 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 design and contributes to the function and character of the borough.

Appendix 1 contains a review of the Estates Local Plan policies against Merton’s Core Planning Strategy objectives.

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:

- The Mayor’s London Plan 2016
- Merton’s Core Planning Strategy 2011
- South London Waste Plan 2012
- Sites and Policies Plan 2014
- Policies map 2014

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.
2.29 As part of the commitment to improving the quality of accommodation to Decent Homes standards, since 2010 Clarion Housing Group have undertaken technical surveys and financial planning work towards achieving this commitment. This work, in Clarion Housing Group’s view indicated that significant refurbishment, maintenance work and financial investment would be required to the housing stock to achieve the required standard.

2.30 Clarion Housing Group advise that residents of Eastfields, High Path and Ravensbury have told them about the problems with their homes and outside spaces, which include homes that are expensive to heat, suffer from leaking roofs, poor noise insulation, condensation and damp and issues with refuse collection and unsafe pathways. Some of these issues were also raised by residents during the council’s consultation in the autumn of 2014, particularly concerns around unsafe pathways, damp and poor internal conditions. Having undertaken an exploration of reasonable options, Clarion Housing Group have decided that regeneration is the most cost effective way of delivering longer term sustainable Decent Homes through the provision of new, well-designed, energy-efficient homes that will meet the needs of residents now and in the future.

2.31 For Eastfields and High Path, Clarion Housing Group propose regeneration of the whole estates and for Ravensbury a mixture of partial regeneration, refurbishment and retention. The council has asked Clarion Housing Group for evidence to support Clarion Housing Group’s view that regeneration is the best way forward including:

- Case for regeneration
- Housing needs studies
- Socio-economic analysis
- Stock condition surveys
- Urban design studies
- Visual Impact Studies

2.32 It is the council’s view, supported by Clarion Housing Groups evidence that whilst incremental refurbishment and Decent Homes works would improve the internal housing quality in the short to medium term, regeneration provides an opportunity to deliver comparatively more significant positive changes to the three neighbourhoods and a once in a generation opportunity to improve the quality of life for current and future residents.

2.33 Regeneration will be expected to provide a range of choices and benefits including high quality well designed neighbourhoods, wider housing mix, more private space for residents, better quality green spaces and community facilities and job creation opportunities. It will also be an opportunity to provide much needed new homes by making more efficient use of brownfield land, improving the quantity, quality and mix of new homes on each of the three estates.

2.34 A key expectation of any regeneration proposals that come 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 regenerated neighbourhood.

The Estates Local Plan Area

2.35 The Estates Local Plan area covers three existing neighbourhoods of Eastfields, High Path and Ravensbury estates as indicated in the respective maps overleaf. These indicate specific boundaries for the Policies Map of the three estates to which the Estates Local Plan policies apply. Upon adoption of the Estates Local Plan, Merton’s statutory Policies Map will be updated to include the Estates Local Plan regeneration area as set out in the adjacent map.

2.36 This section sets out the vision for the regeneration of the estates. This provides the framework for the Estates Local Plan. This vision is informed by a number of other documents and requirements that are detailed elsewhere in the document.
The vision

Overarching vision

2.37 The overarching vision underpins the whole Estates Local Plan and is applied to all of the estates. It is:

“The creation of sustainable, well designed safe neighbourhoods with good quality new homes, that maintain and enhance a healthy local community, improve living standards and create good environments.”

The visions for each estate

2.38 The positive characteristics within and surrounding the estates have informed the individual vision for each estate. These are as follows:

**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.

**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.

**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.
Strategic context
Community Plan
Consultation responses
Sustainability Appraisal
Core Strategy Strategic Objectives
Equalities Impact Assessment
Habitats Regulation Assessment
Health Impact Assessment
Policy Context

Estates Local Plan Vision
The creation of sustainable well designed safe neighbourhoods with good quality new homes, that maintain and enhance a healthy local community, improve living standards and create good environments.

Eastfields Vision
Contemporary Compact Neighbourhood

High Path Vision
New London Vernacular

Ravensbury Vision
Suburban Parkland Setting
Part 02: Background

The vision

Eastfields: Contemporary Compact Neighbourhood - Inspiration

1. Accordia, Cambridge - Feilden Clegg Bradley
2. Newhall Be, Harlow - Alison Brooks Architects
3. Abode at Great Kneighton - Procter & Matthews Architects

* The above images are exemplar examples of existing and proposed residential developments in the UK which have informed the Council’s design aspirations for each estate.

30 Estates Local Plan
Part 02: Background

The vision

High Path: New London Vernacular - Inspiration

2. St. Andrews, Bromley by Bow - Glenn Howells / Maccreanor Lavington
3. Kidbrooke Village, Greenwich - CZWG Architects LLP
4. Ely Court, Brent - Alison Brooks Architects
5. Cambridge and Wells Court, Brent - Lifschutz Davidson Sandilands
6. Agar Grove, Camden - Hawkins Brown Architects

* The above images are exemplar examples of existing and proposed residential developments in the UK which have informed the Council’s design aspirations for each estate.

32 Estates Local Plan
For the key, please refer to individual policy diagrams.
The vision

Ravensbury: Suburban Parkland Setting - Inspiration

1. Horsted Park, Kent - Procter & Matthews Architects
2. Dollis Valley, Barnet - Alison Brooks Architects
3. Mountfield Park, Canterbury - Procter & Matthews Architects
4. Abode at Great Kneighton - Procter & Matthews Architects
5. Beaufort Gate, Hampshire - Re-Format

* The above images are exemplar examples of existing and proposed residential developments in the UK which have informed the Council’s design aspirations for each estate.
For the key, please refer to individual policy diagrams.
Urban Design principles

2.39 This section outlines a set of broad design principles. 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 ones 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.

2.40 Guidance on more detailed aspects of design relevant to regeneration of the estates is given at the end of this document in Part 4.

2.41 Design Review must be embedded into the development process for the regeneration of the estates. The applicants masterplans and proposals for all phases of development on each estate must be reviewed at least once by the council's Design Review Panel.

Perimeter blocks: Buildings arranged so that the fronts face outwards towards the street.

2.42 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: Buildings with many entrances and windows onto the street.

2.43 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: Clear boundaries defining where the fronts of buildings should be.

2.44 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.

Open space: The provision of public and communal amenity space.

2.45 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: The space between the back of the footway and the front of the adjacent building.

2.46 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 the 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 are appropriate to the uses in the buildings.

Promoting biodiversity: Promoting the variety of plants, animals and other living things found in an area.

2.47 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, which can also provide recreational facilities.

Promoting active design: Promoting design that enables healthy lifestyle choices.

2.48 The design of new development and streets must promote Active Design. This approach incorporates local facilities that are easily accessible on foot or cycle and create good quality, well maintained and safe places with convenient and direct routes throughout the development. The public realm should be designed to facilitate low vehicle speeds and reduced vehicle dominance. Active Design provides opportunities for people to be naturally active as part of their daily life, and so improves health and wellbeing.

Promoting sustainable development: Promoting the efficient use of resources that does not prejudice future generations from meeting their own needs.

2.49 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: Arrangement of streets and buildings that offer a convenient choice of routes that are easy to understand.

2.50 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.
Urban Design principles

**Density:** The amount of development that is provided on any given site.

2.51 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:** The amount of parking that is provided on any given site.

2.52 On-street parking should be the initial choice for the way parking is provided. It is essential that on-street parking is 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 both people and vehicles. The council applies the parking standards set out in the London Plan and reference should also be made to the London Housing SPG and subsequent updates.

**Local context (buildings, materials interpretation, art):** Using local good quality design to inform the design and appearance of new development.

2.53 The design, layout and appearance of new development must take inspiration and ideas from the positive elements of the local built, natural and historic context. This must 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.
Part 03
Analysis and planning policies
The creation of sustainable well designed safe neighbourhoods with good quality new homes, that maintain and enhance a healthy local community, improve living standards and create good environments.
Introduction to Part 03

3.1 Part 3 looks in detail at each estate in turn namely Eastfields, High Path and Ravensbury. It is arranged in three parts:

- Site analysis
- Issues and opportunities
- Site specific design policies

3.2 A detailed historical analysis underpins the content of this chapter. As it is background material, this has been located at Appendix 3.

3.3 Part 3 begins with a comprehensive design based, site analysis. This is done at the wider area level and at the estate neighbourhood level. At the wider level, the site analysis covers three areas:

- **Character areas:** This gives an idea of the general character of the wider area and how the neighbourhood fits into this.
- **Current land use:** This illustrates the location of and range of land uses close to the neighbourhood.
- **Transport connectivity:** This shows how well the neighbourhood is connected to its surroundings by foot, bus and train.

3.4 At the estate neighbourhood level the site analysis covers five areas:

- **Building heights:** The range of building heights on the estate and its surrounding area.
- **Public realm and open space:** The way all the space between the buildings is used, such as for roads, gardens and open space.
- **Streets and frontages:** The way the buildings are arranged and relate to the streets and spaces around them.
- **Townscape analysis:** The urban landscape, or general character of the area.
- **Landscape analysis:** Key positive and negative characteristics of the landscape of the area.

3.5 The analysis is followed by a summary of key issues each estate faces and the opportunities the regeneration of the estates present to address these issues.

3.6 This is followed by site-specific policies for any development proposals in the three estate neighbourhoods. These are expressed in the form of design led policies.

3.7 The site-specific policies are grouped under eight different headings. These are as follows:

- **Townscape:** How buildings and spaces should be arranged and their general character.
- **Street network:** The arrangement and layout of streets and what they should look and feel like.
- **Movement and access:** How streets should work in terms of how people get around, by foot, cycle and vehicles.
- **Land use:** Suitable land uses for each neighbourhood.
- **Open space:** The location and type of spaces that should be provided for each neighbourhood.
- **Environmental protection:** How to maximise opportunities for biodiversity and prevent flooding.
- **Landscape:** How each neighbourhood can use and building upon existing landscape assets to create high quality places.
- **Building heights:** Appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area.
Analysis and planning policies - Eastfields
Location

Eastfields Estate

3.8 Situated in the Figge’s Marsh ward, Eastfields is located to the east of Mitcham Town Centre and covers an area of approximately six hectares. The site is bound by Acacia Road and Mulholland Close to the north, Clay Avenue to the east and south and Hammond Avenue to the west. The site is surrounded to the north by two schools (St Mark’s Church of England Academy and Lonesome Primary School) and to the South by London Crematorium, Streatham Park and the Jewish Cemeteries and Long Bolstead Recreation Ground to the west. The nearby Mitcham Eastfields railway station acts as a key local hub.

3.9 The estate was designed by Richard MacCormac and was built in the 1970s and consists of 465 homes. The Eastfields homes are a combination of three storey houses with integral garages and flats in three storey ‘walk up’ blocks each having one or two bedrooms. The homes are all of ‘Wimpey no-fines’ construction, clad with enamel panels. The Eastfields Estate has an inward looking layout distinct from the surrounding neighbourhood. These wider surroundings have a suburban residential character dating predominantly from the inter-war era, with some earlier late 19th Century development in Grove Road. Approximately 55% of the homes on Eastfields are affordable accommodation, the rest are privately owned.
Site analysis

1. Character areas

3.10 The Eastfields Estate is located to the east of Mitcham town centre and north of Mitcham Common. The wider area is defined by the railway line to the west, with Eastfields Station acting as major gateway.

3.11 The map above illustrates the main character areas in the surrounding neighbourhood including the Eastfields Estate. The estate itself is distinctive enough from its surroundings to form its own character area. This is also the case for the area occupied by St. Mark’s Academy and Lonesome Primary School. To the east is the large open space comprised of Long Bolstead Recreation Ground, Streatham Park Cemetery, Rowan Road Jewish Cemetery and Westminster City School Sports Ground.

3.12 The surrounding residential areas are predominantly low rise inter-war suburban housing of semi-detached or short terraced houses. However, there are some pockets of earlier late Victorian cottages and a number of late 20th century infill developments, usually replacing former industrial uses, as was the case with the Eastfields Estate.

3.13 In the wider area a large proportion of the properties date from the 1930s and represent good quality examples of suburban design of the era. The 1970s Eastfields Estate has a very distinctive layout and architectural style that sets it apart from the surrounding street pattern and building forms. There are also two large new housing developments nearby at Brenley Park and Rowan Park, which offer good examples of how new development can fit into the area without replicating it.
Distinctive layout of the Eastfields estate

Eastfields Estate - Clay Avenue

St. Marks Academy

Streatham Cemetery

Level crossing at Mitcham Eastfields station

Long Bolstead Recreation Ground

Tamworth Lane

Woodstock Way
Site analysis

2. Current land use

3.14 The wider area is predominantly residential. Although there are some flats on the Eastfields Estate and in the area to the west of Tamworth Lane, the majority of the residential properties are two storey terraced and semi-detached houses. Lonesome Primary School and St.Marks Academy occupy a large site off Acacia Road. There is a BMX track adjacent to the estate and also the small attractive play area of Long Bolstead Recreation Ground. Within the grounds of St. Marks Academy is the recently built Acacia Intergenerational Centre with adventure playground. There are two small retail areas in the neighbourhood on Tamworth Lane and one at the northern end of Grove Road, which is designated as a neighbourhood parade. There are a number of recreation grounds and playing fields as well as the Streatham Park Cemetery which occupies a large area on the eastern boundary of the neighbourhood.
Site analysis

3. Transport connectivity

3.15 Eastfields sits within a wider area which has a predominantly residential street network, to the east of Mitcham Town Centre. The railway line, school grounds and cemetery land create physical barriers in the wider area which restricts accessibility by any means into the estate.

3.16 Eastfields is approximately 400m or 3-4 minutes walking distance, to the east of Mitcham Eastfields station, this opened in 2008 providing direct rail services to central London and into Surrey. It is also served by buses along Tamworth Lane, Grove Road and Woodstock Way. Bus services are limited, with only two routes (463 and 152) serving the railway station. Although accessibility has been significantly improved with the opening of the station, the isolated location of the Eastfields area, the limited number of trains stopping and the limited number of bus routes mean that the Public Transport Accessibility Level (PTAL) score varies between 3 and 1b.
Site analysis

4. Existing building heights

3.17 Building heights across the estate do not vary and are consistently 3 storeys. Surrounding housing is consistently 2 storeys with pitched roofs, so there is little contrast in building heights, the character being uniform in this respect. St. Mark’s Academy buildings are only 2 storey. The nearest taller buildings are by the railway station, at 6 storeys.

3.18 In the wider area, Rowan Park, located off Rowan Road and completed in 2012, consists of a variety of housing types. The heights range from 2-4 stories. Brenley Park is a development completed in 2013, located to the south-west of Eastfields off Cedars Avenue. The development is predominantly 3-4 stories. There are very limited views of taller buildings in the distance in Croydon.
Site analysis

5. Public realm and open space

3.19 The map above shows how the land around the buildings is used. It shows a distinct contrast between the spaces around the perimeter of the buildings compared to the spaces within. The outer perimeter of the estate is dominated by garage doors to houses at the ground floor, with recessed front doors between. These are dark and unwelcoming spaces, and there is no natural surveillance at street level. The space in front of the perimeter consists of a parking access road, street parking and a general access road bounding this. This creates a large area of hard-standing that is ill-defined and unattractive. The front or ‘public face’ of the estate is very stark, forbidding and unattractive. The small cul-de-sacs leading off the perimeter are little better, and include bin-stores and parking in the centre.

3.20 This poor quality exterior is in complete contrast to the calm, attractive, landscaped appearance of the interior. The open spaces are defined by the buildings which comprises six large areas of communal space leading off a larger central space. There is no vehicular access to this series of spaces, which are dominated by a number of impressive mature trees and enclosed by the regular form of the buildings. The houses’ back gardens face onto the open space, setting up an uneasy relationship between public and private space. Despite there being twenty-eight gated pedestrian entrances into this interior space, it is completely invisible from the exterior. These entrances are so narrow and unobtrusive that they are easily missed, seeming like private back alleys, rather than entrances to parkland.
Ill defined space around perimeter of the estate

Garage doors dominate ground floor frontages

Parking dominates public space

Landscaped interior open space

Narrow alleyways leading into open space

Established trees

Cul-de-sacs
Site analysis

6. Streets and frontages

3.21 The wider context is characterised by low density housing fronting onto traditional streets. The Eastfields estate sits in stark contrast to this, as it has a very rigid form of streets and spaces, with the spaces being internal to the estate and not visible or noticeably accessible from outside it.

3.22 The map above shows that although there are spaces that are physically well defined by buildings, they fail to work as traditional streets because they do not accommodate cars efficiently and unobtrusively and because the buildings offer no visual interaction or surveillance with the outside world at ground floor level.

3.23 The shape of the estate layout, garage door dominated frontages and means of access to the interior make this estate a fortress. The access roads to and around the estate reinforce its isolation and difference from surrounding development. Access for vehicles is confusing as the estate is part accessed from Acacia Road and part from Woodstock Way. There is a natural through link between these two streets however vehicular movement is not possible due to a road closure.

3.24 Inside the estate around the edge of the pleasant green spaces, back gardens with a variety of boundary treatments detract from the otherwise neat and pleasant communal open spaces. There is an uneasy relationship between the private back gardens and the communal areas, making the small back gardens feel less private and secure.
7. Townscape analysis

3.25 The map above shows an analysis of the ‘components’ or parts of the local area that shape people’s perception of it and encourage or limit movement around it. It gives a sense of how the estate is connected to and relates to its immediate surroundings. This includes things like views, vehicle and pedestrian access, local landmarks and focal points for activity or orientation. These are identified as being strong or weak, positive or negative, and give ideas as to what new development could do to improve connections with the wider area.
The Eastfields estate has a large, pleasant green space at its centre, that is cut-off from its surroundings, both for people and biodiversity. It contains pleasant grassed areas and key mature tree groups. By contrast, there is limited green space around the perimeter of the estate. It is only at the edge that patches of unmaintained scrub and unchecked boundary vegetation exist. These are generally negative and there appears to have been no planned landscape around the edge of the estate beyond roads and hardstanding for vehicles. The unchecked boundary vegetation also increases the sense of isolation, minimising the landscape effect of a number attractive individual trees and limiting views to the surroundings.
Issues and opportunities

Issues summary

Integration
3.27 The estate has an inward looking layout whereby the position of buildings creates one uniform edge of development distinct from the surrounding area. The main access road passes the estate, but is incomplete due to a road closure and lacking in visual and vehicular connectivity. This road and the estate street network are a series of cul-de-sacs. This inefficient layout restricts accessibility for vehicles and pedestrians and cyclists.

Estate architecture
3.28 The estate has uniform architectural style. The finish on buildings is rigid and unvarying, in stark contrast to its surroundings. It projects its difference through its appearance and this adds to its visual isolation from the surrounding area. The buildings have weathered poorly in places and positive elements of the consistent architectural style have been eroded by a variety of alterations.

Estate layout
3.29 The estate design has imposed a rigid road layout which prevents movement through the estate and restricts movement around the estate. The street network comprises a sole perimeter road with buildings on one side only, and a series of short cul-de-sacs. Fronts and backs are poorly arranged, with fronts dominated by garage doors and backs facing the open spaces. The public realm is poor because of this, and the wide expanses of tarmac.

Quantity vs quality of landscaping
3.30 The publicly accessible designated open space around the perimeter is isolated by the access road, poorly surveyed, in poor condition and essentially unusable. The large central semi-private non-designated open space in the interior is of high quality and usable, but the smaller spaces leading off this are less successful, as they are enclosed by the back gardens of the surrounding houses.

Visual connectivity
3.31 There is a lack of visual connectivity to the generally attractive surroundings of the playground and cemetery, and generally to longer views that would visually link the estate to its surroundings. This exacerbates the estate’s isolation and breaking down these barriers, such as the unchecked perimeter vegetation and opening up views across neighbouring land, could engender a wider community feel and make residents feel they are part of a wider community.
## Issues and opportunities

### Opportunities summary

### Legible residential streets

**3.32** Create a legible hierarchy of streets and blocks which allow for movement of pedestrians and where appropriate vehicles throughout site. This is to make the area feel connected to its surroundings and allow for easier access across it between the surrounding areas. Streets should be designed as traditional residential streets where fronts of buildings face each other to enclose the street and buildings overlook the public realm.

### Street network

**3.33** Creating an east-west link will help to integrate the estate into the wider area. This could be achieved by creating a clearly visible east-west through street between Tamworth Lane and Woodstock Way by fully connecting up Acacia Road, Mulholland Close and Clay Avenue. The creation of a clearly visible north-south street from Grove Road, through the estate to the southern boundary will also help to integrate the estate into wider area. This connectivity will enable the site to overcome its isolated feel by linking it to the area beyond.

**Create a focal point for the area that links the estate to the surrounding area**

**3.34** The focal point could be at the intersection of the north-south and east-west streets. This will link the estate to its context and allow local people from the wider area to interact with the estate.

### Reconfiguration of open space to create functional open spaces

**3.35** Develop undesignated open spaces to allow for better distribution of functional open space throughout the estate. Retain existing established mature trees in the central green space. Make this, or a similar replacement(s) publicly accessible and a basis for the creation of new open space and potential local focal points, squares, communal gardens, food growing etc.

### Visual links to surroundings

**3.36** Create visual connectivity to the generally attractive surroundings of the playground and cemetery and to make the BMX track less visually isolated. This could be achieved by retaining the mature trees surrounding the site, whilst thinning the smaller scrub and vegetation from between them, so opening out longer and wider views.
Site specific policies

Policy

EP E1 Townscape

a) Proposals should demonstrate a well defined building line fronting onto the combined east-west street. Buildings should provide continuity and enclosure along the route ensuring buildings address the street.

b) This frontage should not present a fortress-like wall between the street and the estate beyond. Therefore this frontage should be broken at intervals by streets into the estate.

c) Proposals should create a focal point in the estate. The most suitable location for this is at the intersection of the north-south and east-west streets.

d) The massing and layout of proposals should enable visual connectivity from within the estate to the attractive surroundings of the playground and cemetery.

Further guidance

3.37 Landmark buildings should be located around the focal point at the intersection of the north-south and east-west streets.

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.

Justification

3.39 Townscape features should be used as a design framework in which to deliver the vision for Eastfields, of a Contemporary Compact Neighbourhood. Within this framework proposals should demonstrate innovative design and architecture to re-imagine suburban development close to both green spaces and with good access to public transport. Proposals will be expected to respond well to, and integrate well with, green and open spaces and a suburban setting. How to increase the number and quality of new homes whilst responding positively to this overall character will be a key requirement against which design quality is assessed.

3.40 The existing estate is very uniform and fortress-like in its appearance. It is visually distinct from the surrounding housing but other than this, the uniformity of the buildings makes it difficult to understand and navigate around the estate. The internal open space is completely hidden from the outside. The continuous frontage of the estate and the prominent garage doors present a forbidding and unwelcoming visual prospect. This, and the recessed front doors present a visually hostile frontage to the streets. Combined with the large areas of parking these elements break down any sense of there being streets at all, merely spaces that are used to access houses and park cars in.

3.41 Redevelopment should enable the creation of a neighbourhood that is easier to get around and understand; is open, inviting and visually attractive, without necessarily encouraging large numbers of people simply to wander around. A strong active frontage will help the neighbourhood to become more outward looking and better integrated into the wider area. Streets which intersect with the frontage will enable the creation of a well-connected neighbourhood.

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.

3.43 Views through to open areas, such as the playground and cemetery, will better integrate the estate into the wider context.
Site specific policies

Policy

EP E2 Street network

a) The three streets of Acacia Road, Mulholland Close and Clay Avenue should be combined into one continuous east-west street on as straight an alignment as possible.

b) The estate layout should accommodate the potential for a new traditional street following the location of the existing footpath running in a straight alignment from Grove Road to form a junction with Mulholland Close. This new street should be continued clearly through the estate, creating a new north-south street to the boundary with the cemetery with uninterrupted views.

c) A new street should be provided parallel to Hammond Avenue such that the backs of new housing on its west side can face the backs of the existing bungalows on Hammond Avenue.

d) On the east side of the estate a new street should be created to face Long Bolstead Recreation Ground and the cemetery, in order to retain the visual and physical link between the estate and the recreation ground.

e) To the south of the estate there is a wide expanse of under-utilised road space and parking. Here, the existing perimeter street of Clay Avenue should either:-

(i) be positioned closer to the estate boundary and lined with housing frontages overlooking the cemetery, the street being suitable as mews type street; or

(ii) a new traditional street provided, set further north to enable new housing frontages to face north onto it, with backs facing the cemetery. This second option should also allow for north-south streets to penetrate this frontage and open up public views and potential future access into the cemetery.

Further guidance

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.

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, it should not be designed to feel as part of the estate, rather just as another local street.

Justification

3.46 This policy section is about the creation of clearly defined and understood streets. It does not define vehicular movement. This is addressed by policy EP E3.

3.47 The new street network should make the estate feel more open and connected to the surroundings. It will also improve integration of the new street network with the surrounding streets. However it is acknowledged that the surrounding road network and location of open space limits the degree to which this can be done.

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.

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.

3.50 Converting the existing footpath running south from Grove Road to Acacia Road to a new street will create improved links to the existing street network in this area. It will improve pedestrian and cycle links between the estate and across the existing railway footbridge to the north and provide clear visual links to the surrounding greenspace.
Street Grid Examples
Other Internal Streets
New North-South Street
New East-West Street
E2 Street Network
(does not necessarily signify vehicular movement)
Site specific policies

**Policy**

**EP E3 Movement and access**

**a)** Vehicular access arrangements should not divide the estate into two. Proposals for the estate must investigate the feasibility of Acacia Road, Mulholland Avenue and Clay Avenue being combined into a single street with full vehicular access at both ends.

**b)** Pedestrian and cycle access from the north should be improved by upgrading the existing footway/access running south from Grove Road towards Mullholland Close. The potential to widen this link into a proper street with carriageway and footways either side should also be explored.

**c)** Internal north-south streets should penetrate to the site boundary with the cemetery in a number of places on the southern boundary.

**Further guidance**

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

3.53 **Vehicular and cycle** parking on the estate will be provided in accordance with the London Plan (2016) parking standards taking into account specific local conditions and requirements. This should be supported by a Parking Management Strategy.

3.54 The Eastfields estate sits on the outskirts of Mitcham and is considered to be relatively isolated from the surrounding neighbourhood. Situated away from the main road network the most important traffic routes are Grove Road and Tamworth Lane, which are designated local distributor roads.

3.55 Mitcham Eastfields Railway Station is located about 5 to 10 minutes’ walk away and provides links to Central London and Sutton. Access by bus is provided by the route 152 and 463 services. The nearest sizable retail and service offer is at Mitcham town centre, which is located about 1km to the west. The Laburnum Road Home Zone and St Marks Road provides a convenient walking and cycling route to the centre.

3.56 The estate essentially operates as two large cul-de-sacs, accessed from either the east or west. Vehicles on one side of the estate are required to travel via Grove Road in order to get from one side of the estate to the other and the residential areas beyond. This is inconvenient, inefficient and adds to congestion on this already busy road and the level crossing.

3.57 Pedestrian/cycle access exists east-west across the north side of the estate, but the route is far from obvious, being made from three different roads all on slightly different positions and with a visual ‘block’ of tree planting and scrub vegetation in the middle. Pedestrian/cycle access also exists from the north via a footpath from Grove Road. However, this is narrow and poorly overlooked and curves away from the estate at its south end. The estate layout prevents any access across it, or views to the cemetery to the south, where there are also no links into it.

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.

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.
Site specific policies

Policy

EP E4 Land use

a) The land use for the estate will remain predominantly residential with open space provision and with re-provision of the existing number of affordable homes, non-residential uses and designated open space to meet relevant planning policies.

b) Densities should not be solely focused around figures, but must be assessed as a product of a range of relevant design, planning, social, environmental and management factors. Exceeding the current London Plan density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.

Further guidance

3.60 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.

Justification

3.61 Eastfields is located in an area with a low Public Transport Accessibility Level and a suburban character.

3.62 Development proposals should make more efficient use of land by providing schemes which are higher than the current density and result in improving the urban design quality of the estate. Development proposals should accord with the London Plan density matrix and any other emerging or updated relevant policy requirements. As outlined in the London Plan, the density matrix should be used flexibly and in conjunction with other development plan policy requirements.

3.63 Proposals should also consider transport capacity, employment connectivity, the location and characteristics of the site and social infrastructure when determining an appropriate density. Development proposals should contribute to the delivery of a sustainable neighbourhood by building more and better quality homes and demonstrate how the density responds to the local context particularly in terms of design. Proposals should demonstrate graphically how density is sympathetic to the surrounding townscape and distributed in appropriate locations in a mix of buildings to deliver a variety of well-designed new homes and public spaces.

3.64 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 residents individual needs.

3.65 In accordance with Sites and Policies Local Plan policy DM E4 (Local Employment Opportunities) major development 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).
Primary land use: residential
Non-residential use
Site specific policies

Policy

EP E5 Open space

a) There must be equivalent or better re-provision of the area of designated open space at the boundary with the cemetery in terms of quantity and quality to a suitable location within the estate, with high quality landscaping and recreational uses.

b) Suitably designed plays space(s) for all age groups must to be provided in accordance with the Mayor of London’s ‘Play and Informal Recreation’ supplementary planning guidance document (2012).

c) As there are groups of large mature trees in the existing main open space, any new open space must incorporate these trees into it as key landscape feature.

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

Further guidance

3.66 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.

3.67 The open space reconfiguration and landscape connectivity opportunities should be tied in with the requirements for Sustainable Drainage Systems (SuDS) and a reduced rate of surface run-off and storage, and the conveyance of surface water run-off.

3.68 The streets meeting the southern boundary with the cemetery could be in the form of pocket parks that can be utilised for a range of uses including allotments and food growing.

Justification

3.69 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, following a review in 2015 of the public open spaces surrounding the Estates 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). The Street Network (EP E2) and Movement and Access (EP E3) policies will however ensure that the site will be more permeable and will create shorter routes for residents to nearby parks and open spaces, and will therefore address this matter.

3.70 Subject to meeting appropriate minimum standards concerning the provision of outdoor amenity space and play space, there is no requirement to provide additional public open space within the development.

3.71 The relatively narrow strip of designated open space adjacent to the cemetery is of poor quality. The regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality and in a more suitable location.

3.72 Where the provision of a large public open space is justified, the design of the space should be flexible enough in terms of scale, layout and design so that it can play host to a variety of activities such as food growing, playgrounds, sports courts, informal and flexible space which can support occasional use for a broad range of community events. Development proposals must be in accordance with para.74 of the NPPF and Sport England’s Land Use Policy Statement ‘Planning for Sport Aims and Objectives’.

3.73 There are potential opportunities for off-site play space enhancements that might address the need for certain age groups while there will also be a need for some on-site play space. Any proposal should clearly demonstrate how the play space needs of all the age groups will be provided for with reference to the guidance in the Mayor of London’s ‘Play and Informal Recreation’ supplementary planning guidance document (2012).

3.74 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.
Site specific policies

Policy

EP E6 Environmental protection

a) The proposed development must aim to reduce post-development runoff rates as close to greenfield rates as reasonably possible.

b) Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan drainage hierarchy as possible.

c) Sustainable Drainage Systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following benefits:
   - Blends in and enhances amenity, recreation and the public realm
   - Enhances biodiversity
   - Improves water quality and efficiency
   - Manages flood risk

d) The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development. Potential overland 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 flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.

e) Proposals should seek to link existing and proposed open space in a unified landscape layout; this should include minor green corridors that will encourage species to move from the cemetery into or through the development.

f) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayors Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.

g) When preparing development proposals in accordance with policy 5.3 of the London Plan, proposals should include suitable comparisons between existing and proposed developments in order to fully demonstrate the expected improvements. All new developments proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure and sustainable procurement of materials.

h) Technological improvements in battery storage have started to provide a potential energy storage solution suitable for use in connection to domestic solar PV systems. The use of on-site storage offers a potential technological solution that would increase on-site renewable energy consumption, reduce utility costs and provide in-situ demand-side management. Battery storage can therefore be considered to sit within the ‘be lean’ or middle level of the mayors 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.

i) Applicants must demonstrate how their plans contribute to improving air quality and provide evidence to demonstrate that passive ventilation strategies employed to prevent overheating will not inadvertently expose residents to poor air quality or unacceptable levels of external noise.
j) New development must ensure the preservation, protection and enhancement of protected species and habitats within the site and on adjacent land such as Streatham Park Cemetery, and should demonstrate that the proposals would result in net biodiversity gains.

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

l) Development proposals should 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 mean.

3.75 As set out in earlier policies on townscape, movement and access, the creation and layout of a more traditional street network for Eastfields will allow links through and views to the spaces within and beyond the estate, such as between the school playing fields and the cemetery. Regeneration should take the opportunity to retain the existing mature trees where possible and use landscaping and vegetation along the new streets and paths to better link the surrounding green spaces, create an attractive environment and aid biodiversity.

3.76 The land is relatively flat, however a culverted ditch (adopted by Thames Water as a surface water sewer) passes between the estate and Long Bolstead Recreation Ground. Deculverting could provide opportunities to create distinctive landscaping and improved biodiversity, as well as managing surface water flooding that occurs here – a legacy from a long silted up pond. Any deculverting of this asset will require Thames Water approval. An linear SuDS feature may also provide significant benefits, i.e. if it is not possible to deculvert the sewer.

3.77 As already set out in national policy, the London Plan and Merton’s adopted development plan,

- Development proposals will need to include appropriate flood mitigation measures to ensure the development is safe and does not increase the risk of flooding both from the development to the surrounding area and vice versa.
- Any development coming forward will be subject to a Sequential Test, Exception Test and site-specific Flood Risk Assessment to deal with all sources of flooding, which must have regard to Merton’s Strategic Flood Risk Assessment and Local Flood Risk Management Strategy. Eastfields is not shown to be subject to river flooding, but is shown to be at risk of surface water flooding.
- Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk and following the sequential approach. This includes careful consideration of where buildings should be located within the site.

3.78 As surface water flood risk and drainage have been identified as a key issue for Eastfields, development proposals must demonstrate they have achieved greenfield run-off rates as reasonably possible, using Sustainable Drainage Systems (SuDS) and considering surface water management as high up the London Plan (policy 5.13) drainage hierarchy as reasonably possible.
Site specific policies

Justification

3.79 SuDS can include a wide range of measures such as rain gardens, green roofs, balancing ponds, filter strips, green verges and swales. It is important that development proposals demonstrate how SuDS measures are not only considered as drainage solutions but as features to improve the townscape, amenity and public realm of the new Eastfields estate, to enhance biodiversity, to provide recreation and to improve water quality and efficiency.

3.80 Developers are advised that guidance tools, such as the SuDS management train approach will assist with this process and with demonstrating that all of these positive attributes have been considered together. This approach will help create an attractive estate with the overall benefit of cost efficiencies.

3.81 The Mayor of London’s Sustainable Drainage Action Plan (draft) and Sustainable Design and Construction supplementary planning guidance and the government’s National Standards for Sustainable Drainage set out the requirements for the design, construction operation and maintenance of SuDS.

3.82 Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes. However, the measurement of local sustainability policies (CS15) and regional policy targets (London Plan Chapter 5) for new build developments are based on improvement that are also measured through Part L of the Building Regulations. While this information is useful to help measure performance, it does not make it easy to compare the energy performance of existing buildings with new buildings.

3.83 Energy performance data on existing buildings will be held for many sites in the form of Energy Performance Certificates which measures the predicted energy consumption per m² in a development. By providing the energy performance data from Energy Performance Certificates, building energy performance can be compared between existing and future development using a metric that is suitable and easily comparable, thus helping to clearly demonstrate the potential for environmental improvements.

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

3.85 Passive ventilation strategies cannot be considered in isolation of potentially negative external environmental factors such as air quality or noise. Energy strategies that rely on passive ventilation should clearly demonstrate that occupants will not be adversely affected by air and noise pollution during periods of warmer weather.
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 need to develop polices to support Innovative Energy Technologies is outlined in London Plan policy 5.8. Battery storage can be utilised as a method of increasing on-site renewable energy consumption 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 lean’ measure within the Mayors energy hierarchy. The standard approach from calculating the energy output from solar PV assumes 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 that distribution losses are zero.

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

kWp – Kilowatt Peak (Size of PV System)
S – Annual Solar Radiation kWh/m² (See SAP)
ZPV – Overshading Factor (See SAP)

3.88 As with other planning applications, the council will require the submission of a working method statement and a construction logistics plan prior to development proposal commencement. Working method statements must ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and comply with London Plan (2016) policies 6.3 and 6.14, Merton’s Core Strategy policy CS20 and policy DM T2 of Merton’s Sites and Policies Plan (2014). Construction logistics plans must demonstrate how environmental impacts of the development on the local environment, including the surrounding highway network and the amenities of the surrounding occupiers will be minimised. These must also accord with guidance published by the mayor of London / TfL and London Plan (2016) policies including 7.14 and 7.15. These are particularly important over such a long-term programme to ensure that each new phase of development minimises the impact on residents living within and beside the estates.

3.87 Consultation responses have raised concerns about the potential for disruption and disturbance caused by building works taking place in phases over a long period of time.
Site specific policies

Policy

**EP E7 Landscape**

a) Street tree planting must be a key feature of a landscape strategy which links into proposed open space with significant trees, the recreation ground and the adjacent cemetery.

b) Landscaping layouts must, where practicable, form green links between open spaces and the public realm, whilst framing visual links from the estate to the adjacent cemetery and recreation ground.

c) There must be street tree planting on the combined east-west street of Acacia Road, Mulholland Close and Clay Avenue, including the retention of established trees as well as the planting of new trees.

d) Additions to existing tree planting, must reinforce the linear nature of the east-west street. In addition tree planting should create a landscape buffer between new development and any traffic flow on the route.

e) Tree species must be specified to mitigate against pollution and noise. Planting layout and species need to be considered to ensure an attractive street scene whilst taking care not to restrict light or cause overshadowing to adjacent buildings.

f) Landscaping proposals must address the perimeter of the estate in a unified manner. Unattractive scrub particularly on Mulholland Close should be removed to improve the setting of established trees and visual links to the surrounding area. Mature trees around the estate should be retained and the boundary treatment enhanced.

g) The estate currently has a group of established mature trees in the central green space. These trees must be retained and be used to inform the design of landscaping, for example to provide cues for the location of focal points.

Further guidance

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.

Justification

3.90 The estate is a highly urban form in a low density suburban landscape setting. This setting is defined largely by the surrounding large open spaces of Streatham Park Cemetery, Long Bolstead Recreation Ground and the playing fields and open space associated with St. Marks Academy and Lonesome Primary School to the north. This setting is also responsible for the site’s isolation relative to surrounding residential development.

3.91 At the estate level the urban form isolates the inner landscape, open space and trees from the surroundings, as does scrub vegetation around the site boundaries.

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.

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.
E7 Landscape

Green links and tree planting
Pocket parks
New and retained boundary trees
Scrub removal
Retained tree groups