

## PLANNING APPLICATIONS COMMITTEE 15 September 2016

	<u>APPLICATION NO.</u>	<u>DATE VALID</u>
	16/P1696	25/04/2016
<b>Address/Site:</b>	Haig Housing Estate, Hill Top & Rhodes Moorhouse Court, Green Lane, Morden SM4 5NS	
<b>Ward:</b>	St Helier	
<b>Proposal:</b>	Demolition of garages and erection of 68 residential units with associated parking and landscaping.	
<b>Drawing No.'s:</b>	See Condition 2	
<b>Contact Officer:</b>	Felicity Cox (020 8545 3119)	

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### RECOMMENDATION

**Grant planning permission subject to s106 legal agreement and conditions.**

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### CHECKLIST INFORMATION

- S106: Yes
- Is a screening opinion required: No
- Is an Environmental Statement required: No
- Has an Environmental Statement been submitted: No
- Press notice: Yes
- Site notice: Yes
- Design Review Panel consulted: Yes
- Number of neighbours consulted: 195
- External consultations: 3
- Controlled Parking Zone: No
- Flood zone: Yes
- Conservation Area: Yes
- Listed building: No
- Protected Trees: Yes
- Public Transport Access Level: 2-3

#### **1. INTRODUCTION**

- 1.1 This application is being brought to the Planning Applications Committee for determination due to the number of objections received. Furthermore, as the proposal involves building on designated open space, the application is a departure from planning policy and therefore needs to be brought before the Planning Applications Committee.

#### **2. SITE AND SURROUNDINGS**

- 2.1 The Haig Housing Trust Estate (HHT) at Morden as it currently stands was largely developed between 1930 and 1935. The 25 acres of land located between the

railway line, Central Road and Epsom Road were leased by the London County Council to the Trustees of Douglas Haig Memorial Homes. Houses and flats were built to accommodate ex-servicemen and their widows and families.

- 2.2 The Estate is divided into two sub-areas - Haig Estate South and Haig Estate North - by Green Lane. The application site relates to the south-eastern section of the Haig Housing Trust Estate, known as Rhodes Moorhouse Court and Hill Top.
- 2.3 The area to the east of Trenchard Court, between its rear gardens and the access road to Rhodes Moorhouse Court was left undeveloped, but the provision of a gap in the buildings at Hill Top suggests that future expansion onto this site and the requirement for vehicle access had been anticipated at an early stage. The strip of land between Hill Top and the large open space adjacent to Rhodes Moorhouse Court is currently enclosed by Harus fencing and is used by Haig's Grounds Maintenance team for storage purposes.
- 2.4 The large open space at Rhodes Moorhouse Court is currently unused (apart from an area set aside for residents to walk their dogs). It is separated by metal railings from the later (1950's) adjacent singlesided broken terrace development of Rhodes Moorhouse Court along the eastern boundary of Haig Estate South. A small access road on to this terrace from Green Lane terminates in a cul-de-sac with an incongruous pair of garages within the open space, which is otherwise fenced off from the roadway. A public right of way exists along the eastern edge of the space, linking with the residential area at Torrington Way to the south, and is used by pedestrians to access the adjacent St. Helier railway station via Green Lane.
- 2.5 The whole of the existing Estate falls within the Upper Morden Conservation Area. Some areas, in particular the space bounded by The Precincts, The Sanctuary and South Close, and the large area of open ground between the rear of Trenchard Court and Rhodes Moorhouse Court, are designated open space.

### 3. **CURRENT PROPOSAL**

- 3.1 The application proposes the creation of 68 new residential units and associated landscaping and parking, including the creation of a new central green space. The proposal is in response to the funding that has been granted to Haig Housing Trust from the Ministry of Defence through the Veterans Accommodation Fund (VAF) to provide an additional 68 residential units.
- 3.3 The summary Schedule of Accommodation below shows the amount of new housing proposed on the Rhodes Moorhouse Court and Hill Top sites. The proposal includes a total of 7 wheelchair user dwellings.

UNIT TYPE	One Bedroom Two Person Flat	One Bedroom Two Person Wheelchair Flat	Two Bedroom Three Person Flat	Two Bedroom Three Person Wheelchair Flat	Two Bedroom Four Person Flat	Two Bedroom Four Person Maisonette	Two Bedroom Four Person Wheelchair Flat	Three Bedroom Four Person Flat	Three Bedroom Five Person Flat	Three Bedroom Four Person House	Three Bedroom Five Person House	Four Bedroom Six Person House	TOTAL UNITS	Net New Car Spaces	
MINIMUM UNIT AREA	50	60	61	71	70	83	80	74	86	96	102	113			
Hill Top	6	2	4	0	2	0	0	0	0	4	1	0	19		12
Rhodes Moorhouse Court	13	2	2	1	10	1	2	5	0	0	8	5	49		50
Totals	19	4	6	1	12	1	2	5	0	4	9	5	68		62
	23		22			23									
% by Unit	34%		32%			34%									

- 3.4 It is proposed that the court buildings facing the open space at Rhodes Moorhouse Court Gardens generally rise to three storeys and share the same building materials, general form, volume, massing and detailing. The court buildings are designed to be

read as a complete group in the spirit of the existing formal groups on the estate such as South Close, Denmark Court and Legion Court. The housing proposed within Rhodes Moorhouse Court Gardens can be described as follows:

1) U-shaped group to the north of the open space

A 15 unit apartment group comprising a three storey element of 12 units facing the open space with one and two storey subservient 'wings' of 1 and 2 units respectively facing the northern boundary and rear gardens of houses along Green Lane.

2) Terraced group to the west of the open space

A 13 house terrace (8 no. three bed and 5 no. four bed) bookended by three storey stacks of 3 no. apartments at each end of the terrace.

3) L-shaped group to the south of the open space

A 15 unit apartment group comprising a three storey element of 12 units facing the open space with a two storey subservient 'wing' of 2 units facing the southern boundary and west towards the proposed group at Hill Top Court.

3a) Detached bungalow to the south-east of the open space A single, one storey wheelchair user bungalow at the southern end of the entrance access loop addressing the existing houses along Rhodes Moorhouse Court and also Torrington Way to the south.

- 3.5 The proposal for the Hill Top Court area of the site is to create an extension to the existing Hill Top building group by slightly extending the Hill Top estate access road, through to a small new semi-formal linking court group similar to others in the estate, and linked and integrated in to the proposed Rhodes Moorhouse Court Gardens development. It is proposed that the buildings in the Hill Top Court group rise to two storeys and would relate closely to the general form, massing and detailing of the existing buildings at Hill Top and Trenchard Court. They are designed to provide a transition between the existing Hill Top buildings and the new group proposed at Rhodes Moorhouse Court Gardens. The housing proposed within the Hill Top Court site can be described as follows:

4a) Detached house south of the Rhodes Moorhouse Court terrace A two storey, three bed detached house providing a focus to the transition point at the small landscaped parking area south-west of Rhodes Moorhouse Court.

4b) Group of paired semi-detached houses west of group 4a Two pairs of two storey, semi-detached three bed houses arranged close together to the north and south of a pedestrian axis route to provide a sense of enclosure to the Hill Top Court group and a transition point between the Rhodes Moorhouse Court Gardens and Hill Top Court groups.

4c) Paired apartment groups west of group 4b Two pairs of two storey, 4 unit apartment groups arranged to the north and south of the pedestrian axis route between the Rhodes Moorhouse Court Gardens and Hill Top Court groups.

4d) L-shaped group west of the existing Hill Top group A two storey, 6 unit apartment group infilling this open area to define the linking point between the existing and new Hill Top groups.

- 3.6 Vehicular and pedestrian access to the new development is proposed from within the main body of the existing estate at Hill Top and from the existing access road serving Rhodes Moorhouse Court. All access roads within the site will be low speed, shared

surface with pedestrian priority, in keeping with the existing roads across the HHT Estate.

- 3.7 Existing parking provision for current residents at Rhodes Moorhouse Court and Hill Top will be maintained (16 spaces) and a total of 62 net new car parking spaces are to be provided on site.
- 3.8 Private gardens are proposed for the three and four bed family houses, with a combination of private and communal open space proposed for flats. A large shared amenity space is proposed in a landscaped central 'garden' at Rhodes Moorhouse Court Gardens. The provision of play space in the proposed development has been considered in the context of the Estate as a whole and therefore the applicant proposes that a Local Landscaped Area for Play replaces the existing tennis courts.

#### **4. PLANNING HISTORY**

- 4.1 The site has an extensive planning history primarily relating to miscellaneous applications for tree works. As the proposed buildings are to be located on an undeveloped section of the site, it is not considered relevant to detail the extensive planning history of the site in this instance.

#### **5. CONSULTATION**

##### **5.1 Public consultation**

Public consultation was undertaken by way of post, site notices and press notices. In total 18 representations were received from members of the public / residents with 1 in support and 17 in objection. The points made in the representations received are summarised as follows:

Those received in support (1):

- Need for re-housing of veterans far exceeds Haig's annual turnover of homes, especially in London
- In response to neighbours' concerns about overlooking, the distance between the new buildings and rear of dwellings fronting Rougement Avenue is at least 80 feet and the 6-foot high fence is to be retained with new shrubs to be planted for screening
- Number of objections from Moorhouse Court residents centre on access road from Green Lane plus provision of adequate number of resident's parking bays. Haig Homes have stipulated they are providing 16 bays for the 12 existing homes, which is more than other areas of the estate which average only one bay per household. Each of the new 68 dwellings will also have their own bay so there would be no pressure on existing residents.
- Regarding the access road width, understood that the garden at 12 Haig Close had been reduced to permit wider access off Green Lane
- Objectors comments on parking of emergency vehicles, contractors and the like is considered irrelevant. Rest of estate works fine with day to day comings and goings of vehicles and some properties don't even have vehicular access. Residents' vehicles being denied access temporarily in an emergency is not something to object to

Those received which objected to the proposed development (15):

- Proposal will increase burden on infrastructure such as schools, NHS services etc.

- There are opportunities to create housing on other Haig Housing Estates rather than expand this one; additionally expansion on other parts of the estate would be more appropriate
- Loss of green space of site would be negative
- Adding to the estate would be detrimental to the social cohesion of the community
- Haig Housing Trust have not listened to residents comments and those who oppose the proposal, and have not openly consulted with residents from the beginning of the process
- Consultation undertaken by Haig Housing Trust has weighted to the advantage of Haig Housing Tenants
- Three storey building along southern boundary will be overly imposing and lead to loss of privacy for dwellings along Rougement Avenue and 52 Torrington Way due to height and proximity to boundary. Due to ground rising above Rougement Avenue, even two storey building would be overbearing. Balconies on the L-shaped building (No. 3) will also overlook rear gardens and homes of properties on Rougement Avenue.
- Planting of trees will not overcome privacy and overlooking issues.
- Proposal for three storeys is out of scale and out of character with surrounding buildings and area. Layout of buildings along the southern boundary of the site is not in keeping with the existing line of buildings along Rhodes Moorhouse and Torrington Way.
- Proximity of buildings to boundaries will generate high levels of noise and disturbance to what is currently a quiet area, cause loss of views, and loss of open aspect and suburban atmosphere of the neighbourhood
- Windows looking towards Rougement Avenue dwellings should be fixed shut with opaque glass
- Buildings along the southern boundary should be set back from the boundary line
- Inadequate number of parking spaces have been provided, and parking in the surrounding roads is already an issue. Unrealistic to expect that all dwellings will only have one car. No spaces have been provided for visitors in addition to residents and it does not address current shortage of spaces for existing residents.
- Combination of open space for play combined with parking around its boundary appears to be poorly thought out design in terms of health and safety considerations
- Proposal is over development that would be to the detriment of other residents. Whilst basis of units to land space the ratios may not appear to be unreasonable, the layout of the plans shows the buildings are too close to existing homes.
- Planning statement refers to anti-social behaviour in Rhodes Moorhouse Court. Disputed by residents who state that they have never seen inappropriate behaviour and this could be addressed through CCTV cameras if it does occur.
- Proposal will exacerbate flood issues on site and flood report did not take account of the impact on surrounding properties when water flows down off the site
- Layout of estate should be reconsidered. There are opportunities to provide housing using different designs and in different parts of the estate.
- Proposal would lead to loss of value of the adjoining properties
- Incorrect information given on the planning applications, such as answering 'no' to the site being vacant, answering 'no' to the site being viewable from a public road, footpath or other public way, and declaring that the facts stated in

the form are accurate.

- Proposal will change from open, healthy environment to close-by intrusive/invasive/threatening environment leading to an avoidable unhealthy, environment
- Proposal has been largely driven by needing to meet the financial objectives
- Heritage report does not identify or encourage specific materials required to sustain the conservation area and may therefore be detrimental to the conservation area
- Proposal provides insufficient provision of family housing, which has been identified in planning policy as in short supply in the borough.
- Density of the proposal is too high and not in keeping with suburban character of the area
- Design of buildings does not add value to the existing character of both heritage and historical buildings within the neighbourhood
- Trees of significance are being removed and there is evidence of bats in the area
- Electric car spaces should not be restricted to electric cars only, to help alleviate parking stress issues
- Link from Haig Homes to Rougement needs to be upgraded with more than just hedges
- Single passing bay for access from Green Lane is insufficient given the number of movements that will be generated by the new houses. Potential for conflict is a safety concern.
- Access for emergency vehicles, delivery vehicles and contractors has not been taken into consideration

Re-consultation was undertaken following submission of amended plans. Five further objections were received citing the following:

- Three storey height not in keeping with height of Haig Housing Estate and will create a more urban environment in an established suburban area
- Minimal proximity of buildings will result in overlooking into gardens of Torrington Way/Rougemont Avenue houses and result in loss of privacy and natural light, and be visually overbearing on properties
- Insufficient changes made to the plans to address neighbour's amenity concerns
- Scheme is considerate of existing HHT residents but doesn't take into consideration impacts on neighbouring properties around the estate
- Level of parking insufficient given parking demand in surrounding streets
- Concerns about impact of natural drainage/water runoff resulting from loss of green space
- Provision of 26% family residences not in keeping with 50% strategic housing recommendation
- 14 day re-consultation period insufficient and poorly timed over holidays

## 5.2 Transport for London

- The A24 Epsom Road that is adjacent to the Haig Housing Estate (although not the particular covered by this application) is a TfL managed red route
- TfL accepts modelling and considered development is not likely to cause an unacceptable impact on nearby TLRN
- Requested reduction in number of parking spaces
- Level of disabled parking and bicycle provision acceptable
- Request EV charging points be increased to provision of 20% active and 20% passive charging points

- Conditions – Car Parking Management Plan, Travel Plan and Construction Logistics Plan

Officer response:

- LBM Traffic & Highways have responded that the parking provision is acceptable. It is in line with the London Plan parking standards and due to number of veterans living on the site with limiting health problems there are likely to be a high number of visits from carers and medical professionals.
- LBM Traffic & Highways have responded that electric vehicle charging point provision is acceptable and in accordance with London Plan standards – because the estate is social housing recognised that there can be some flexibility in the level of provision
- Appropriate conditions have been included

### 5.3 Network Rail

- No comments or objections.

### 5.4 Designing Out Crime Officer

- Defensible space is provided by front gardens and low hedge planting adjacent to ground floor windows.
- Natural surveillance to be promoted through careful selection of plant species, on going maintenance programme and the creation of vision channels where shrubs have a mature growth height no higher than 1 metre, and trees with no foliage, or lower branches below 2 metres.
- If a play area is proposed, it should be in a location to allow for supervision from nearby dwellings with safe routes for users to come and go.
- Any seating should be designed to include centrally positioned arm rest dividers to assist those with mobility issues and prevent people from lying down.
- Space should be created between any seating and footpaths to help reduce the fear associated with having to walk past and be located where there will be natural surveillance.
- Blank gable ends should be avoided to deter potential ASB of graffiti or ball games also to increase the chance of natural surveillance
- Lighting should be to BS 5489:2013 and council requirements.
- Any planting adjacent to the car parking areas must be carefully selected to allow for clear views of the cars and avoid the creation of potential hiding places.

Officer response:

- Comments have been incorporated into the design. The design was amended to include defensible spaces in front of the houses and blank walls have been avoided. Detailed landscape design will be secured by condition.

### 5.5 Internal responses

#### LBM Traffic & Highways

- The carriageway layout doesn't work unless it is going to be one way throughout the site with all motorised vehicular traffic exiting via Hill Top
- The proposed access arrangements onto Green Lanes from Rhodes Moorhouse Court Gardens are not acceptable unless it is going to be access only. The increased volume of traffic generated by the development will make the two way operation of the access point from Green Lane into Rhodes Moorhouse Court unworkable and lead to traffic queuing on Green Lane to

enter the estate.

- The parking layout with teardrop layout and angled parking is visually and functionally unacceptable. not right and looks awful.
- The pedestrian and cycle access through the site to the south to Rougemount Avenue needs to be maintained and enhanced – require agreement ensuring a public right of way through the site
- The refuse vehicle tracking shown in the drawings is only 9 metres long and not the larger 10 metre vehicle.
- Level of provision for parking, disabled parking, cycle parking and EV charging points acceptable
- Proposed bin locations do not require these to be moved more than 25 metres
- Conditions – Cycle Parking (Implementation), Travel Plan, Construction Logistics Plan

Officer response:

- Layout was amended to remove tear-drop arrangement, create two-way carriageway and provide for parallel parking – LBM Traffic & Highways advised this was considerable improvement and now acceptable
- Tracking for 10m vehicle provided demonstrating site can be serviced by larger Refuse Collection Vehicle
- Dimensions of access to Green Lane increased to provide for two-way access in accordance with officer comments. Access also amended to incorporate officer recommendations to include signs/markings at the pinchpoint showing that traffic entering from Green Lane has right of way over vehicles exiting, double yellow lines or other forms of parking restriction introduced along the length of the access road from the pinch point to Green Lane to ensure vehicles do not park up on it in the future, and junction of Rhodes Moorhouse Court at the junction with Green Lane provided a raised entry treatment to compensate for wider junction crossing

#### LBM Urban Design & Conservation Area Officer Comments:

- Overall it is considered that this is a good quality proposal that has a good layout and integrates well into the existing estate and is at a complementary but increased density
- Overall approach to architectural design of buildings appropriate and respectful of Conservation Area, however requested information on materials and finishes to be provided
- Massing, height and scale of buildings appropriate. However detailed design needs to create an emphasis on vertical rhythm rather than horizontal
- Whilst the layout of buildings is appropriate, proposed square, arrangement of parking and road layout with tear drop would detract from conservation area due to visual dominance of car parking and road layout
- One-way road layout inflexible and parking has created barriers to pedestrian movement
- Green space too formal and not in keeping with more informal character of open space in the conservation area
- Wide dormer windows do not relate to scale of other dormer windows in the estate
- Block 2 roof form massing is overly dominant and needs to be addressed
- Internal floor area for bedrooms to be provided
- Proposal could better integrate existing Rhodes Moorhouse Court dwellings into development by removal of front fences

Officer response:



- Layout was amended to remove tear-drop arrangement, increase area of central green space and provide for parallel parking – LBM Urban Design & Conservation advised this was considerable improvement and now acceptable
- Detailed design elements such as chimneys, drain pipes and material details added to reduce massing and create vertical emphasis
- Landscape concept plans submitted providing for more informal green space to Rhodes Moorhouse Court and additional landscaping at rear of Block 2 – Conservation & Urban Design Officers commented amended design is respectful of openness of Haig Housing Estate and Conservation Area
- Width of dormer windows reduced and Conservation Area Officer advised this is acceptable
- Internal floor areas provided to meet requirements of London Plan
- HHT have advised that existing residents of Rhodes Moorhouse Court opposed to removal of their front fences and hence this has not been revised
- Condition – materials to be submitted to ensure the development preserves and enhances conservation area

#### LBM Biodiversity/Ecology

- Findings and recommendations of the June 2016 Middelmarsh Environmental reptile survey report (No: RT-MME 122471) acceptable
- The conversion of a tennis court into a play space facility would not have an undue impact on the SINC
- The proposed play space on the 1300sqm tennis court, will exceed the minimum requirements set out in the Mayor's Play and Informal Recreation SPG and is acceptable
- Conditions – provision of bird boxes & submission of detailed design of play space

Officer response:

- Noted – appropriate conditions have been included.

#### LBM Tree Officer : No objection

- Proposed to remove approx. 16 single trees and 2 groups of trees (there are 8 trees in one group and 7 trees in the other group). The proposals include the removal of two B1 category trees (T21& T32);
- The proposals do include the retention of a few trees around the perimeter of the site. These will need to be protected during the course of site works;
- The submitted landscape proposals indicate that approx. 70 new trees are to be planted across the site. These consist of a good range of species that should, in time, make a significant contribution to the landscape amenities of the estate.
- Conditions – Tree Protection, Site Supervision (Trees), Design of Foundations, Landscaping & Implementation

Officer response:

- Noted – appropriate conditions have been included.

#### LBM Environmental Health Officer

- No objections to proposal
- Conditions – Demolition & Construction Method Statement, External Lighting & Contaminated Land Informative

Officer response:

- Noted – appropriate conditions and informative have been included.

#### LBM Flood Risk Engineer

- FRA and Foul/Surface Water Drainage Strategy acceptable
- Condition recommended for development to be implemented in accordance with Surface Water Drainage strategy

#### Officer response:

- Noted – appropriate conditions have been included.

#### Sustainability/Climate Change Officer

- Development is to be designed in accordance with the Mayor's energy hierarchy and will meet policy requirements
- Condition recommended relating to CO2 emissions to be 35% improvement on Part L 2013 (Building Regulations) and water usage rates not to exceed 105 litres per person per day.

#### Officer response:

- Noted – appropriate conditions have been included.

### **Design Review Panel – notes relating to Haig Housing Estate from meeting on Tuesday 24<sup>th</sup> November, 2015**

#### **Item 1:** Pre-Application, 15/P2690/NEW, Units 1-4, Haig Homes Masterplan, Morden

The Panel were impressed with the proposals and presentation, and liked the strategy of keeping and developing the series of courtyards/green squares. At the macro level, the Panel noted the aim of the applicant to create a calm and relaxed atmosphere for war veterans. The Panel however, felt that this should not necessarily lead to maintaining low site density. There was only one opportunity to get the masterplan right and the applicant needed to ensure they made the best use of the land whilst respecting the conservation area and existing estate. The Panel felt that it was quite possible to achieve calm tranquillity in a slightly higher density development.

At the next level, the Panel felt that the masterplan was in places not very clear about its pedestrian and vehicular routes and that, particularly on the southern site, it was creating ambiguous spaces and parking courts that were well out of sight of housing. It was felt that this could be significantly improved upon, particularly with the creation of a street linking Rhodes Moorhouse Court with the Trenchard Court/South Close area. Streets needed to be simple, clear and straight with parallel parking where possible. Streets should be designed to create a calm and safe environment, with easy level crossings at pavement level that support a design speed of 20mph maximum. It was felt that the tennis court could be retained as green space and the proposed housing be located behind it to turn Trenchard Court into a larger central square.

It was felt that the layout could be a bit more efficient and compact, giving a stronger block structure a clearer grid of streets and paths to provide clearer sight lines and a greater feeling of safety. It was felt that some spaces such as Lawrence Weaver Close were well resolved blocks with surrounding roads, but the other smaller, more awkward spaces, were less successful. It was felt that the large parking court next to the railway was not efficient and was more suitable for extra housing as is close to the station and shops. It was also felt that the north-west edge of the site adjacent to

London Road was underdeveloped and provided an opportunity to create some higher density housing to form a barrier between the busy road and main part of the estate and better define the mature landscaping remaining from the former house.

It was felt that more work was needed on the landscaping and that a clear landscape strategy was needed to understand which were the important trees and which were not, and to provide a long-term landscape plan for the estate. This was important for a number of reasons, primarily because the current estate benefits from a high quality green landscape that needed to be maintained and enhanced.

Parking is integral to this and the Panel was uncomfortable with the creation of large parking courts as on-street end-on arrangements had less detrimental impact on the landscape and could more flexibly accommodate different sized vehicles. Several parking courts also had poor surveillance from dwellings. It was felt that on-street end-on parking should be used more, with parking also potentially also sensitively integrated into the larger landscaped squares as part of an overall landscaping strategy of 'imaginative integration' but that this should not undermine the landscape quality of these spaces.

The Panel were not opposed to an architectural style similar to that existing housing, but warned of the risk of creating a monotonous feel to the estate in so doing. To this end the Panel encouraged the applicant to consider a slightly more contemporary feel that still retained scope for architectural variety and which also respected and drew upon the existing architectural context. The Panel were clear in their feeling that the new housing should be inspirational for the new veterans and respond to their needs in many ways, such as low-cill large windows for wheelchair users, so that they attain and provide homes to lifetime-homes standards.

The designs for the Haig Centre seemed more advanced than those for the housing. The Panel recommended that the designs for the courtyards now needed to be worked up more carefully in terms of both the architecture, landscaping and streets and that individual designs for each courtyard/square be developed, giving them each their own character.

Overall the Panel welcomed the proposals but felt there was still scope for the applicant to be bolder, braver and try harder. They were close to producing something exceptional but not quite there yet

**VERDICT: GREEN**

**Design Review Panel – notes relating to Haig Housing Estate from meeting on Tuesday 19<sup>th</sup> April, 2016**

**Item 2:** Pre-Application, 15/P2690/NEW, Haig Homes, Green Lane, Morden

The Panel welcomed a number of changes since the review in November 2015, particularly the improved route through the site and the removal of the parking courts. The Panel reiterated its support for the garden square concept and for the shared surface approach to the streets. The Panel's main concerns centred around how parking was accommodated on the site, and that this caused a range of other problems.

The Panel felt that the parking provision dominated the square and should not do so. This was due to the angled echelon arrangement. Whilst this maximised the number of spaces, it isolated the square from the houses. The high number of spaces and

low level landscaping proposed to mitigate the visual effect of cars also did this and reduced natural surveillance into the square.

It was suggested that the parking arrangement was a little over-designed and may lead to people pavement parking. It needed to be flexible and simple on-street parking softened with planting may be the best approach (although there was a suggestion for forecourt parking). The Panel also felt that parking dominance was evident by the three roads into the site and that one of these should be removed if possible.

It was felt that the overall design was too rigid, formal and symmetrical. Whilst this may be a sound basis from which to start, the Panel felt that something more dynamic was needed and the design needed to 'loosen up' a little. Removing one of the roads might help.

The internal design of the square needed to reflect desire lines and the paths did not do so. Internally there also needed to be more imagination in the layout, which seemed a little sterile and lacking a social dimension. The square needed to connect far better to the surrounding houses and both to feel part of one whole. Visibility and natural surveillance was key to this and the Panel suggested less low-level planting and more tree planting with higher canopies that allowed views across the site.

The Panel did not comment extensively on the architecture, thought did suggest that square windows rarely worked well as neither the opening, nor the window could both be square at the same time. Overall the Panel were very supportive of the proposal but felt that further work was needed primarily on the approach to parking and development of the landscaping concept.

#### **VERDICT: AMBER**

## **6. POLICY CONTEXT**

### **6.1 NPPF - National Planning Policy Framework (2012):**

- 6. Delivering a wide choice of quality homes.
- 7. Requiring good design.

### **6.2 London Plan (2015)**

Relevant policies include:

- 2.6 Outer London: Vision and strategy
- 2.8 Outer London: Transport
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.11 Affordable housing targets
- 3.13 Affordable housing thresholds
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.10 Urban greening
- 5.13 Sustainable drainage
- 5.17 Waste capacity
- 6.3 Assessing the effects of development on transport capacity
- 6.5 Funding Crossrail and other strategically important transport infrastructure

- 6.9 Cycling
  - 6.11 Smoothing traffic flow and easing congestion
  - 6.12 Road network capacity
  - 6.13 Parking
  - 7.1 Lifetime neighbourhoods
  - 7.2 An Inclusive environment
  - 7.3 Designing out crime
  - 7.4 Local character
  - 7.5 Public realm
  - 7.6 Architecture
  - 7.8 Heritage assets and archaeology
  - 7.14 Improving air quality
  - 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
  - 8.2 Planning obligations
- 6.3 Merton Local Development Framework Core Strategy – 2011 (Core Strategy)  
 Relevant policies include:  
 CS 8 Housing choice  
 CS 9 Housing provision  
 CS 13 Open space and leisure  
 CS 14 Design  
 CS 15 Climate change  
 CS 17 Waste management  
 CS 18 Transport  
 CS 19 Public transport  
 CS 20 Parking servicing and delivery
- 6.4 Merton Sites and Policies Plan – 2014 (SPP)  
 Relevant policies include:  
 DM H2 Housing mix  
 DM H3 Support for affordable housing  
 DM D1 Urban Design  
 DM D2 Design considerations  
 DM D4 Managing Heritage Assets  
 DM O1 Open space  
 DM O2 Trees, hedges and landscape features  
 DM EP2 Reducing and mitigating noise  
 DM T1 Support for sustainable travel and active travel  
 DM T2 Transport impacts of development  
 DM T3 Car parking and servicing standards  
 DM T4 Transport infrastructure
- 6.5 Supplementary planning considerations  
 London Housing SPG – 2012  
 Merton Design SPG – 2004
- 7. PLANNING CONSIDERATIONS**
- 7.1 Key planning considerations:
- Principle of development
  - Affordable housing
  - Open space / green space
  - Design and impact upon the character and appearance of the area
  - Biodiversity

- Play space
- Flooding
- Impact upon neighbouring amenity
- Standard of accommodation
- Transport and parking
- Refuse storage and collection
- Cycle storage
- Sustainability

#### Principle of development

- 7.2 Policy 3.3 of the London Plan 2015 states that development plan policies should seek to identify new sources of land for residential development including intensification of housing provision through development at higher densities and that the Council will work with housing providers to provide a minimum of 4,107 additional homes [411 new dwellings annually] between 2015 and 2025.
- 7.3 Core Strategy policies CS8 & CS9 seek to encourage proposals for well-designed and conveniently located new housing that will create socially mixed and sustainable neighbourhoods through physical regeneration and effective use of space. This should meet the needs of all sectors of the community and include the provision of family sized and smaller housing units. Policy DM H2 confirms that the Council is seeking to encourage "socially mixed, sustainable communities with a greater choice and better mix in the size, type and location of housing" with an indicative housing mix of 33% one bedroom dwellings, 32% two bedroom dwellings and 35% three or more bedroom dwellings.
- 7.4 Haig Housing Trust is the largest provider of accommodation to the Veterans sector and provides independent, social housing to ex-Servicemen and women in housing need, as well as providing specialist housing solutions to wounded, injured and sick Veterans. The submitted Statement of Need demonstrates that the demand for housing assistance from Veterans has grown exponentially over the past 5 years and is currently at a peak, with demand highest in London and the South East. Current demand for veteran housing assistance from bona fide applicants nationally outstrips HHT means by a factor of 6:1. In London and the South East, the disparity is much larger by a factor of 11:1. Haig has experienced a 30% increase in qualifying applications in the last three years whilst our stock has grown by only 3.4% in the same period.
- 7.5 The proposal relating to the expansion of the Haig Housing Estate would result in a net increase of 68 residential units that range in size from one bedroom two-person flats to four bedroom, six-person houses to accommodate an identified need for housing for service leavers, the elderly and new veteran families needing housing assistance. The proposed housing mix is in accordance with the preferred housing mix specified in Policy DM H2, and also provides for 10% wheelchair accessible dwellings in accordance with Policy CS8. The proposed expansion of the Haig Housing Estate would address an urgent need for accommodation for veterans and their families and accord with London Plan policies, Merton Local Development Framework Core Strategy, Merton Sites and Policies Plan and supplementary planning documents.

#### Affordable Housing

- 7.6 Core Strategy policies CS8 outlines provisions for affordable housing in line with the relevant provisions of policies 3.11 and 3.13 of the London Plan (2015). Core Strategy CS8 specifies affordable housing target of 40% of the units to be provided on-site as affordable housing, to consist of 60% social rented and 40% intermediate provision.
- 7.7 The new housing to be created by Haig Housing Estate would ultimately all be provided as affordable rent and would be retained by Haig Homes Trust in order to cater for the specific needs of the community it serves. However, notwithstanding the intention to retain all of the units in the HHT estate, for planning purposes this planning application seeks only to explicitly secure the provision 31% of the units (21 units) (equating to 40% of the total habitable rooms being created by the proposal) as affordable housing through the associated Section 106 Agreement (see table below). In accordance with the HHT model, all 40% of the housing secured under s106 would be social rent and no intermediate provision would be proposed.

	Private Units		Affordable Units (All Social Rent)		TOTAL	
	Units	Habitable Rooms	Units	Habitable Rooms	Units	Habitable Rooms
1 bed flat (2 hr)	19	38	4 (4 wheelchair)	8	23	46
2 bed flat (3 hr)	19	57	3 (3 wheelchair)	9	22	66
3 bed flat (4 hr)	4	16	1	4	5	20
3 bed house (5 hr)	5	25	8	40	13	65
4 bed house (6 hr)	0	0	5	30	5	30
<b>TOTAL</b>	<b>47</b>	<b>136</b>	<b>21</b>	<b>91</b>	<b>68</b>	<b>227</b>
<b>%</b>	<b>69</b>	<b>60</b>	<b>31</b>	<b>40</b>	<b>100%</b>	<b>100%</b>

- 7.8 Notwithstanding that Policy CS8 seeks the provision of 40% of the units as affordable housing, having consideration to the fact that 100% of the dwellings to be created will be delivered as social rent, and that the s106 units will include a greater proportion of family sized units, it is considered that the number, tenure and mix of affordable housing provision is acceptable in this instance.
- 7.9 However, it is recommended that the terms of the s106 require the delivery of 6 additional units as affordable housing (social rent) in the event of any of the untied dwellings being sold on the open market in future. This would consequently result in the overall scheme delivering a minimum of 40% of the units (equating to a total of 27 residential units) as affordable housing under s106.

#### Open Space

- 7.10 In line with the NPPF, Merton's adopted Sites and Policies Plan Policy DM O1 states that designated open space should not be built on unless the open space is surplus to the requirements of the Borough, the loss would be replaced by equivalent or better provision in terms of quantity or quality, or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

- 7.11 The proposed development would result in a net loss of designated open space when compared to the existing situation. As set out in Part 2 of the submitted Design and Access Statement, several alternative sites were considered to accommodate the additional housing and through a process of feasibility studies, masterplan development and consultation with existing HTT residents, the Hill Top and Rhodes Moorhouse Court sites were selected. Many of the alternative sites offered the opportunity for smaller infill development around the estate. Rhodes Moorhouse Court offered the only opportunity for a single larger scale development in one location.
- 7.12 The impact of the proposals on the character of the area, other policy designations and neighbouring properties were considerations in the selection of the site. The Rhodes Moorhouse Court site offered the opportunity for a high quality development that would reflect the character and layout of the estate. It is not constrained by any ecological/environmental designations and would have a limited impact on the amenities of existing neighbouring occupiers.
- 7.13 Consideration was also given to which sites would deliver the most cost effective use of the funding available. Developing several smaller and more awkward sites in one go would not be as cost effective. HHT are in a very unusual situation of having a sum of money to spend in one go which allows them to develop a larger scheme that would not otherwise be possible. They are unlikely to ever have the funds again to build this number of units in one go.
- 7.14 All of these considerations point towards developing the Rhodes Moorhouse Court site now, along with the adjacent Hill Top site that would provide the 68 units that the funding allows for.
- 7.15 Any perceived harm from the development of this land would be offset by the provision of additional housing and the enhanced landscaping, visual amenity and accessibility of the remaining land. As detailed in the Open Space Statement prepared by HHT, the land in question has been largely closed off from public access for some time and is not currently used for recreation or amenity. The Conservation Area Character Assessment draws attention to the poor landscape quality of the open space at Rhodes Moorhouse Court as being a negative feature within the Conservation Area. Concerns over the use of the land because of anti-social behaviour issues, have been highlighted in the feedback from public consultations undertaken by HHT.
- 7.16 This proposal offers the opportunity to address those concerns. The proposal will deliver a reduced area of public open space but that space will benefit from natural surveillance from the new residential properties and will become a central feature for the residents. It is anticipated that the quality of this open space provision will be significantly enhanced as a result of the development.
- 7.17 In light of the need to provide additional housing to meet the significant demand for housing of ex-Servicemen and women and the potential for the site to meet this need, it is considered that the community benefits from the proposal would outweigh the loss of designated open space, and therefore a departure from planning policy is considered to be acceptable in this instance.

Design and impact upon the character and appearance of the area



- 7.18 London Plan policies 7.4 and 7.6, Core Strategy policy CS14 and SPP Policy DMD2 require well designed proposals that will respect the appearance, materials, scale, bulk, proportions and character of the original building and their surroundings. Policy 7.6 sets out a number of key objectives for the design of new buildings including that they should be of the highest architectural quality, they should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm, and buildings should have details that complement, but not necessarily replicate the local architectural character. Policy CS14 of the adopted Core Strategy states that all development needs to be designed to respect, reinforce and enhance local character and contribute to Merton's sense of place and identity. This will be achieved in various ways including by promoting high quality design and providing functional spaces and buildings.
- 7.19 The Haig Housing Estate is designated within the Upper Morden Conservation Area. The Upper Morden Character Assessment notes *"There are six Locally Listed buildings within this sub area – The Precincts, The Sanctuary, Trenchard Court, South Close and Hill Top... Each of the main building groups displays its own group value, in terms of the consistent architectural treatment. Thus 3-12 Central Road, the Sanctuary, Hill Top, South Close and Trenchard Court are each seen to be a homogeneous entity in terms of their architecture and plan form."* The Character Assessment notes that 1-12, 12a and 14 Rhodes Moorhouse Court are considered to make a neutral contribution.
- 7.20 To address the comments of the Design Review Panel, along with those of LBM Urban Design, Conservation & Traffic Officers, the layout was revised to remove the tear-drop road arrangement and angled parking, replacing this with a larger central green space and the provision of parallel parking to reduce the visual impact of parking. LBM Urban Design/Conservation Officers have commented that the revised layout of the development around the new square is highly relevant and appropriate, relating well to the original design ethos of the estate. The revised layout provides for a clear and legible link through the estate and preservation of a large, identifiable green space where there will be loss of existing open land. There is also a clear link maintained to Torrington Way for pedestrians. The existing estate's buildings are formally laid out around squares, with the spaces left primarily as grass and not significantly intruded by parking. The amended proposal repeats this pattern of formality in buildings with a more informal approach to the open space and landscaping in line with the rest of the estate.
- 7.21 The landscape design for the estate was revised to address the comments of the Design Review Panel and LBM Urban Design, Conservation & Traffic Officers by taking inspiration from the landscape remnants of the former house on the site. The landscape design has achieved a more informal green space through an arrangement of mature trees of mixed species disbursed throughout the space with varying tree top profiles. The design has incorporated paths following desire lines and provision of low level landscaping in front of the buildings to provide for casual surveillance. These amendments, along with the rearrangement of parking, have resulted in the greenspace better integrating with the surrounding housing and are considered to create a high quality asset that will make a positive contribution to the conservation area and will retain the leafy and open character of the existing Estate.
- 7.22 The density is also considered appropriate. Compared to the existing estate density it is an intensification, but the character is in the spirit of the original layout and fits in well. It will not feel over dense and the provision of the new square is key to this. The scale and height of the building is also considered appropriate. This consists of one,

two and three storey buildings with pitched roofs. This mirrors the scale found on the estate as a whole, which is a mix of three, two and sometimes one-storey buildings.

- 7.23 The architectural style and detail of the two parts of the development (the extended Hill Top Court and Rhodes Moorhouse Court Gardens) are treated in slightly different ways. In general terms the proposed buildings in the Rhodes Moorhouse Court Gardens group and adjacent sub-courts are designed as a contemporary interpretation of the Classical Domestic Style typically found on the estate. In general terms the proposed buildings in the Hill Top Court group are designed to create a transition between the existing buildings at Hill Top and the new group at Rhodes Moorhouse Court Gardens
- 7.24 The overall rhythm, massing and architectural design of the buildings is considered acceptable. LBM Urban Design/Conservation Officers have commented that the overall architectural style is clean and crisp and has its own character. With a condition requiring submission of materials to ensure the use of high quality materials, it is considered the proposal will be an asset and improvement to the Conservation Area. The yellow brick and concrete tiles are not consistent with the materials of the existing buildings. However, given this is a new 'quarter' to the estate, and a more contemporary feel is being encouraged, a departure from this is appropriate. The addition of metal clad service risers to the roof, dormer windows, drainpipes and brick soldier course details in the detailed design further aid in achieving a suitable mass and balance between horizontal and vertical rhythm.
- 7.25 In conclusion, the design, scale, layout and appearance of the proposed development is considered acceptable when taken in the local context, and the proposal is considered to preserve and enhance the Upper Morden Conservation Area.

#### Biodiversity/Ecology

- 7.26 Policy CS13 of Merton's Core Strategy (2011) seeks to protect and enhance biodiversity within the borough. London Plan Policy 7.19 states in part D that: "*On Sites of Importance for Nature Conservation development proposals should: ...give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.*" The only part of the proposal that is on a Site of Importance for Nature Conservation (SINC) is the proposed play space that is to be erected on the existing tennis court.
- 7.27 The applicant has supplied an Ecological Appraisal and undertaken an Environmental Reptile Survey Report in June 2016. These documents have been reviewed by LBM Open Space/Biodiversity Officer who has commented that the conversion of a tennis court into a play space facility would not have an undue impact on this part of the SINC. With suitably worded planning conditions, which secure the bird boxes recommended in paragraph 4.7 of the 29 March 2016 Crossman Associates Ecology Appraisal, the proposals will result in net biodiversity gains and is therefore considered to be in accordance with policy CS.13 of the Core Strategy (2011).
- 7.28 Policy CS13 of the Core Strategy also seeks that new developments incorporate and maintain landscape features such as trees which make a positive contribution to the wider network of open space.
- 7.29 It is proposed to remove approximately 16 single trees and 2 groups of trees (there are 8 trees in one group and 7 trees in the other group), including the removal of two

B1 category trees (T21& T32). In addition to the retention of several trees around the perimeter of the site, the submitted landscape proposals indicate that approximately 70 new trees are to be planted across the site. LBM Trees Officer has commented that the proposed replanting consists of a good range of species that should, in time, make a significant contribution to the landscape amenities of the estate. The LBM Trees Officer has recommended conditions to be attached relating to tree protection for the trees to be retained, site supervision, and submission of details of the design and foundations.

#### Play Space & Loss of Tennis Court

- 7.30 Merton's Core Planning Strategy policy CS 13 and The London Plan policy 3.6 require housing proposals to provide play spaces for the expected child population and the Mayor of London's 'Play and Informal Recreation' SPG 2012 provides detailed guidance on this matter.
- 7.31 The nearest play space is the Morden Recreation Ground Play Area, which is approximately 540m 'actual walking distance' from the site and to access it children would have to cross Green Lane. The proposed provision of play space on the 1,300 square metre tennis court will exceed the minimum requirements set out in the Mayor's Play and Informal Recreation SPG, and is therefore considered to be acceptable subject to the submission of design details secured by means of a suitably worded planning condition.
- 7.32 With respect to building the new playspace on the existing tennis court, Part B 'Planning decisions' of London Plan 3.19 states: "Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted." Part H of Core Strategy Policy CS13 states: *"Based on assessment of need and capacity, opportunities in culture, sport, recreation and play will be promoted by: 1. Safeguarding the existing viable cultural, leisure, recreational and sporting facilities and supporting proposals for new and improved facilities;..."*.
- 7.33 Taking into consideration Merton's Playing Pitch Study (June 2011) which commented that there are sufficient courts to meet demand now and in the future, it is considered that in this instance, the need for a play space would clearly outweigh the loss of the tennis court and is therefore acceptable.

#### Flooding

- 7.34 Policies DM F1 and DM F2 of Merton's Sites and Policies Plan and policy CS.16 of the Core Strategy seeks to ensure that development will not have an adverse impact on flooding and that there would be no adverse impacts on essential community infrastructure. The site is located within Flood Zone 1 and is therefore at low risk of flooding from fluvial flooding.
- 7.35 The applicant submitted a Flood Risk Assessment with the application, and following on from concerns relating to drainage and comments from LBM Flood Risk Officer, submitted a Surface Water Drainage Strategy. The reporting details proposed drainage measures, including permeable pavements and directing exceedance flows along the roads towards the Rhodes Moorhouse Court Gardens open space. These documents have been reviewed by the LBM Flood Risk Officer who has no objections on flood risk or drainage grounds. The proposed greenfield runoff rates are in accordance with the London Plan 5.13 and Merton's policy DM F2 requirements. LBM Flood Risk Officer has recommended inclusion of a suitably

worded condition requiring implementation of the surface water drainage strategy in accordance with the submitted material.

Impact upon neighbouring amenity

- 7.36 SPP policy DM D2 states that proposals must be designed to ensure that they would not have an undue negative impact upon the amenity of neighbouring properties in terms of loss of light, quality of living conditions, privacy, visual intrusion and noise.
- 7.37 The proposed development varies in height from one to three stories. Existing buildings surrounding the site are generally two storeys in height, some with further accommodation within their roofspaces.
- 7.38 Proposed Block 1 is a U-shaped block that varies in height from 1-2 storeys adjacent to the rear boundaries of 12, 12a & 14 stepping up to three storeys in height where fronting the new internal carriageway. Taking into consideration the separation distance would be a minimum of 24 metres from the rear elevation of houses fronting Green Lane to the northern flank wall of Block 1, and the limited openings provided along the flank elevation of Block 1 (primarily at ground level), the proposal is not considered to lead to undue overlooking into the rear of the adjoining houses. BRE Sunlight/Daylight assessments provided demonstrate the surrounding dwellings will maintain acceptable access to daylight and sunlight. When taking into account the setbacks and stepped height, it is not considered that Block 1 would result in an unacceptable amenity impacts on the adjoining dwellings.
- 7.39 Proposed Block 2 will be three storeys and is located to the west of the new central green space within the centre of the site. The building is located over 30 metres from the nearest neighbouring dwellings at Trenchard Court and Haig Place. Given this separation distance and building height and massing, Proposed Block 2 is not considered to adversely impact the amenities of any adjoining dwellings.
- 7.40 The proposed building Hill Top Court group buildings 4a, 4b, 4c, and 4d along the southern site boundary are located a minimum of 30m from the rear elevations of houses along Rougement Avenue to the south. Although there is a change in ground level from the Haig Homes Estate down to the dwellings fronting Rougement Avenue, the submitted BRE sunlight/daylight analysis demonstrates that the dwellings will maintain adequate access to sunlight/daylight. The two storey height of the buildings and setback from the nearest dwellings will allow for for adequate outlook, privacy and sunlight/daylight to the adjoining dwellings fronting Rougement Avenue and therefore the new Hill Top Court buildings are not considered to adversely impact the amenities of neighbours.
- 7.41 The U-shaped Block 3 fronting Rhodes Moorhouse Court Gardens has also been sited a minimum of 30m from the rear elevation of houses along Rougement Avenue to the south and is of an appropriate massing, height and siting to not detract from the amenities of these properties. In relation to the impact of this building on 52 Torrington Way, it is noted that the orientation of this house is such that the outlook to its rear is in a westerly direction, and Block 3 will be located to the north of the rear garden. The southern flank elevations of Block 3 located closest to the boundary are single storey with the three storey components of the building set back from the shared boundary. Only one opening is proposed on the flank elevation facing south. The distance between the nearest windows facing towards the rear elevation of 52 Torrington Way will be 35 metres, exceeding standard distance requirements to ensure adequate privacy. The BRE sunlight/daylight analysis demonstrates that the dwelling will maintain adequate access to sunlight/daylight. With a suitably worded

condition securing screening to the side elevations of balconies of Units 63, 67 & 68, it is considered that the design, siting, height and scale of Block 3 is appropriate to not cause undue amenity impacts on neighbours.

- 7.42 Proposed Block 3a is a bungalow and has been sited so to maintain the outlook from the flank windows of 52 Torrington Way. Given its single storey nature and setback from the southern boundary, it is not considered that the bungalow will adversely impact the amenities of neighbouring dwellings in Torrington Way.
- 7.43 In order to create the proposed site and road layout a small number of existing garden boundaries will need to be realigned from properties no. 2 Hill Top, 10, 11 and 12 Trenchard Court and 12, 12a and 14 Haig Place. All of the garden boundary and access roads to be realigned are privately owned by HHT and all of the affected gardens, once realigned, will still be in excess of 50sqm and with lengths greater than 11m, ensuring the residents of these properties maintain sufficient access to private amenity space.

#### Standard of accommodation

- 7.44 Policy 3.5 of the London Plan 2015 states that housing developments should be of the highest quality internally and externally and should ensure that new development reflects the minimum internal space standards (specified as Gross Internal Areas - GIA) as set out in Table 3.3 of the London Plan (Table 3.3). Table 3.3 (as amended in the Housing Standards Minor Alterations to the London Plan – March 2016) provides a comprehensive detail of minimum space standards for new development; which the proposal would be expected to comply with.

Table 1: Section of table in Table 3.3 of the London Plan

Number of bedrooms	Number of bed spaces	Minimum GIA (m2)			Built-in storage (m <sup>2</sup> )
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	

- 7.45 The GIA of each of the proposed unit types are summarised as follows:

Residential units	Unit	Required GIA	GIA	Number of units at this size
Unit Type 1	1 bed 2 person – WHC flat	50m <sup>2</sup>	78m <sup>2</sup>	1
Unit Type 2	3 bed 4 person flat	74m <sup>2</sup>	76m <sup>2</sup>	4
Unit Type 3	1 bed 2 person flat	50m <sup>2</sup>	50m <sup>2</sup>	12

Unit Type 4	1 bed 2 person – WHC flat	50m <sup>2</sup>	72m <sup>2</sup>	1
Unit Type 5	2 bed 4 person flat	70m <sup>2</sup>	70m <sup>2</sup>	8
Unit Type 6	1 bed 2 person flat	50m <sup>2</sup>	53m <sup>2</sup>	1
Unit Type 8	2 bed 3 person – WHC flat	61m <sup>2</sup>	81m <sup>2</sup>	1
Unit Type 9	2 bed 4 person flat	70m <sup>2</sup>	70m <sup>2</sup>	2
Unit Type 10	2 bed 3 person flat	61m <sup>2</sup>	64m <sup>2</sup>	2
Unit Type 11	3 bed 5 person house	99m <sup>2</sup>	113m <sup>2</sup>	8
Unit Type 12	4 bed 6 person house	112m <sup>2</sup>	123m <sup>2</sup>	5
Unit Type 13	3 bed 4 person flat	74m <sup>2</sup>	82m <sup>2</sup>	1
Unit Type 14	3 bed 4 person house	84m <sup>2</sup>	97m <sup>2</sup>	4
Unit Type 15	2 bed 3 person flat	61m <sup>2</sup>	67m <sup>2</sup>	2
Unit Type 16	1 bed 2 person – WHC flat	50m <sup>2</sup>	70m <sup>2</sup>	2
Unit Type 17	2 bed 3 person flat	61m <sup>2</sup>	67m <sup>2</sup>	2
Unit Type 18	1 bed 2 person flat	50m <sup>2</sup>	58m <sup>2</sup>	2
Unit Type 19	1 bed 2 person flat	50m <sup>2</sup>	53m <sup>2</sup>	2
Unit Type 20	2 bed 4 person flat	70m <sup>2</sup>	71m <sup>2</sup>	1
Unit Type 21	1 bed 2 person flat	50m <sup>2</sup>	50m <sup>2</sup>	2
Unit Type 22	2 bed 4 person flat	70m <sup>2</sup>	71m <sup>2</sup>	2
Unit Type 23	3 bed 5 person house	93m <sup>2</sup>	112m <sup>2</sup>	1
Unit Type 24	2 bed 4 person – WHC flat	70m <sup>2</sup>	85m <sup>2</sup>	1
Unit Type 25	2 bed 4 person – WHC flat	70m <sup>2</sup>	90m <sup>2</sup>	1
Unit Type 26	2 bed 4 person flat	79m <sup>2</sup>	104m <sup>2</sup>	1

- 7.46 As shown above, all units meet or exceed the minimum floor area requirements as set out in the London Plan 2015. All habitable rooms are serviced by windows which are considered to offer suitable outlook and natural light; in addition, all units are dual or triple aspect.
- 7.47 All main entrances to flats and houses are visible from the public realm, covered and arranged to provide level access with level or gently sloping approaches.
- 7.48 In accordance with the London Housing SPG, the Council's Sites and Policies Plan states that there should be 5 sqm of external space provided for 1 bedroom flats with an extra square metre provided for each additional bed space. Merton's Sites and Policies Plan (2014) policy DM D2 requires for all new houses a minimum garden area of 50sqm.
- 7.49 All houses are to be provided with private rear gardens with areas of at least 50sqm in accordance with Policy DM D2.
- 7.50 The new ground floor units are provided with private paved patio areas set within hedging, whilst flats on the upper floors are provided with balconies or terraces of appropriate sizes. A minimum of 5m<sup>2</sup> of private outdoor space will be provided for 2 person dwellings, with an extra 1m<sup>2</sup> provided for each additional occupant. The minimum depth and width of all balconies and other private external spaces is 1500mm.

- 7.51 There are 5 number proposed flats in the Hill Top Court group which do not feature private outdoor space. These are the 3 first floor units in building group 4d and 1 first floor unit in each of the two 4c building groups. These units, as well as all others within the proposed development will though have direct access, through the communal circulation cores, to private communal open space to the rear of the buildings.
- 7.52 Whilst it is noted that there are five flats which will not have access private community space, these units, as well as others within the proposed development, will have direct access to private communal open space courtyards to the rear of the buildings, varying in size from 57sqm – 400sqm. This reflects an arrangement common within the existing Estate, whereby provision of private gardens is not universal and rather the Estate features a variety of communal garden, semi-private and private external garden areas. Furthermore, the development will see the re-provision of an 1,800m<sup>2</sup> communal green space in addition to the extensive landscaped open spaces throughout the Estate that are accessible by all residents.
- 7.53 It is therefore considered that all future occupiers will provided with adequate access to outdoor amenity space, providing for a good internal and external standard of living for any future occupants.

#### Transport and parking

- 7.54 Core Strategy policy CS20 requires that development would not adversely affect pedestrian or cycle movements, safety, the convenience of local residents, on street parking or traffic management. The site has a PTAL Rating of 2-3 and is adjacent to the St Helier Train Station.
- 7.55 Residents have raised concerns with the level of parking provision based on parking stress in the area. The proposed layout would replace the existing 16 spaces for residents of Rhodes Moorehouse Court and provided an additional 62 new car parking spaces, thereby providing car parking for the new units at a rate of .91 spaces per unit, which is in accordance with the London Plan maximum parking standards. LBM Transport & Highways have commented that the level of provision is in accordance with the London Plan maximum parking standards and due to number of veterans living on the site with limiting health problems there are likely to be a high number of visits from carers and medical professionals. LBM Traffic & Highways have also commented that the level of electric vehicle charging points is acceptable and the level of disabled car parking provision is in accordance with London Plan standards. As such, the level of parking provision is considered acceptable. TfL have requested a Car Parking Management Plan to be secured as a condition.
- 7.56 In response to objections from LBM Transport & Highways, Conservation and Urban Design officers, the layout of the internal access road and parking area was amended to remove the original tear drop and angled parking arrangement to create a larger central green space with parallel parking and two way access throughout the site. It is considered that the amended parking and road alignment is an improvement both visually and in terms of vehicle manoeuvrability and pedestrian safety. LBM Transport & Highways have no objections to the amended parking and road alignment and is therefore considered acceptable.
- 7.57 In response to LBM Transport & Highways and objections received, the access road from Green Lane was amended to remove the passing bay and widened to a width of 4.8m at the entrance to allow for two-way access and egress from Green Lane. The

access will reduce to a width of 3.9m at a pinchpoint in front of 1 Rhodes Moorhouse Court before increasing to a two-way carriageway within the Estate.

- 7.58 LBM Transport & Highways Officers have commented that the amended access is suitable to accommodate the anticipated increase in traffic movements without resulting in queuing on Green Lane and address safety concerns. Officer recommendations have been incorporated into the design of the access to ensure safe movement of vehicles and pedestrians, including the provision of signs demarcating vehicles entering from Green Lane have right of way over vehicles exiting at the access pinchpoint, provision of double yellow lines along the length of the access road from the pinch point to Green Lane to ensure vehicles do not park up on it in the future, and the provision of a raised entry treatment to compensate for wider junction crossing at the junction of Rhodes Moorhouse Court at with Green Lane.
- 7.59 The existing public footpath from Green Lane in the north-east corner and linking through the estate at Rhodes Moorhouse Court Gardens to Torrington Way in the south-east corner of the site will be maintained and can be secured by a suitably worded condition.

#### Refuse storage and collection

- 7.60 Refuse and Recycling storage for the new development will be provided adjacent to the new access roads for ease of collection by the Waste Services. These are generally located in dedicated stores around the communal entrance porches for the new flatted areas and within purpose designed enclosures in front garden areas for the new houses.
- 7.61 Within the Rhodes Moorhouse Court section, the proposed collection points are within 25m of the intended refuse collection points around the site in accordance with LBM Standards. Within the Hill Top Court section, the width and manoeuvring limitations of the existing access road near Hill Top does not permit bins to be stored within 25 metres of the refuse vehicle access and therefore the waste management arrangements already provided within the estate will be extended as necessary to serve the new flats and houses within Hill Top Court.

#### Cycle storage

- 7.62 Cycle storage is required for new development in accordance with London Plan policy 6.9 and table 6.3 and Core Strategy policy CS 18. Cycle storage should be secure, sheltered and adequately lit.
- 7.63 Secure cycle storage is provided within the flatted elements of the development within enclosures in the private communal garden area of each of the blocks and to the houses within purpose designed enclosures within front garden entrance areas or within private rear gardens where secure direct access to the rear garden is available direct from the public areas of the development.
- 7.64 Based on the proposed accommodation, the London Plan requires provision of a minimum number of 109 number long stay and 2 short stay secure cycle storage facilities. The proposed provision of 112 long stay and 2 short stay spaces exceeds the London Plan requirement and is therefore considered acceptable.

#### Sustainability



- 7.65 Policy 5.2 Minimising Carbon Dioxide Emissions of London Plan requires that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy. Merton's Core Planning Strategy Policy CS15 Climate Change (parts a-d) requires new developments to make effective use of resources and materials, minimise water use and CO2 emissions.
- 7.66 LBM Climate Change Officers have confirmed that the development will achieve a minimum 35% improvement on Part L Building Regulations 2013 and achieve water usage rates not in excess of 105 litres per person per day in accordance with Policy 5.2 and in exceedance of the requirements of Policy CS15. As per the recommendation of LBM Climate Change Officers, a condition to the above effect has been included to ensure compliance.

## **8. CONCLUSION**

- 8.1 The proposed redevelopment of the Haig Housing Estate for 68 new dwellings is considered to be of an appropriate design, siting and scale to minimise amenity impacts on neighbours, and preserve and enhance the character and appearance of the Upper Morden Conservation Area. The new greenspace is considered to preserve and enhance the leafy and open character of the existing Estate and will improve the usability and quality of this space for residents. In light of the need to provide additional housing to meet the significant demand for housing of ex-Servicemen and women and the potential for the site to meet this need, it is considered that the community benefits from the proposal would outweigh the loss of designated open space, and therefore a departure from planning policy is considered to be acceptable in this instance, and is therefore recommended for approval.

## **RECOMMENDATION**

**Grant planning permission subject to planning conditions and the completion of a S106 agreement covering the following heads of terms:**

1. Delivery of 31% of the residential units on the site (equating to 40% of the total habitable rooms) as affordable housing (100% as affordable rent);
2. In the event that any of the new residential units on site are sold on the open market, the delivery of 40% of the residential units of the original scheme (equating to 27 residential units) as affordable housing (100% as affordable rent);
3. The developer agreeing to meet the Council's costs of drafting the Section 106 Obligations [£ to be agreed].
4. The developer agreeing to meet the Council's costs of monitoring the Section 106 Obligations [£ to be agreed].

## **And the following conditions:**

1. A1: Commencement of Works

A7 Built according to plans: GA 001 Rev PL (Site Location Plan), GA 002 Rev PL1 (Planning Constraints Plan), GA 110 Rev PL1 (As Proposed Estate Ground Floor/Site Plan), GA 111 Rev PL1 (As Proposed Site Plan), GA 112 Rev PL1 (As Proposed Context Ground Floor/Site Plan), GA 113 Rev PL1 (As Proposed Context Roof Plan/Site Plan), GA 120 Rev PL1 (As Proposed Parking & Traffic Flow Plan), GA 121 Rev PL1 (As Proposed Cycle Store Plan), GA 122 Rev PL1 (As Proposed Refuse Store & Collection Plan), GA 123 Rev PL1 (As Proposed Trees to be Removed, Retained and Added), GA

124 Rev PL1 (As Proposed Garden Boundary & Road Realignment), GA 125 Rev PL1 (As Proposed Private Gardens & Amenity Space), GA 201 Rev PL6 (As Proposed Ground Floor/Site Plan), GA 202 Rev PL5 (As Proposed First Floor Plan), GA 203 Rev PL5 (As Proposed Second Floor Plan), GA 204 Rev PL4 (As Proposed Roof Plan), GA 210 Rev PL1 (As Proposed Unit Types Ground Floor Plan), GA 211 Rev PL1 (As Proposed Unit Types First Floor Plan), GA 212 Rev PL1 (As Proposed Unit Types Second Floor Plan), GA 311 Rev PL2 (As Proposed Block 1 Ground Floor/First Floor Plan), GA 312 Rev PL2 (As Proposed Block 1 Second Floor/Roof Plan), GA 321 Rev PL3 (As Proposed Block 2 Ground Floor Plan), GA 322 Rev PL3 (As Proposed Block 2 First Floor Plan), GA 323 Rev PL2 (As Proposed Block 2 Second Floor Plan), GA 324 Rev PL2 (As Proposed Block 2 Roof Plan), GA 331 Rev PL1 (As Proposed Block 3 Ground Floor Plan), GA 332 Rev PL1 (As Proposed Block 3 First Floor Plan), GA 333 Rev PL1 (As Proposed Block 3 Second Floor Plan), GA 334 Rev PL1 (As Proposed Block 3 Roof Plan), GA 341 Rev PL2 (As Proposed Block 4 Ground Floor Plan), GA 342 Rev PL2 (As Proposed Block 4 First Floor Plan), GA 343 Rev PL1 (As Proposed Block 4 Roof Plan), GA 411 Rev PL1 (As Proposed Block 1 Sections (Sheet 1)), GA 421 Rev PL1 (As Proposed Block 2 Sections (Sheet 1)), GA 431 Rev PL1 (As Proposed Block 3 Sections (Sheet 1)), GA 441 Rev PL1 (As Proposed Block 4 Sections (Sheet 1)), GA 501 Rev PL3 (As Proposed Site Elevations (Sheet 1)), GA 502 Rev PL3 (As Proposed Site Elevations (Sheet 2)), GA 511 Rev PL3 (As Proposed Block 1 Elevations), GA 521 Rev PL3 (As Proposed Block 2 Elevations), GA 531 Rev PL2 (As Proposed Block 3 Elevations), GA 541 Rev PL2 (As Proposed Block 4 Elevations (Sheet 1)), GA 542 Rev PL2 (As Proposed Block 4 Elevations (Sheet 2)), GA 801 Rev PL4 (Unit Type 1), GA 802 Rev PL4 (Unit Type 2), GA 803 Rev PL4 (Unit Type 3), GA 804 Rev PL4 (Unit Type 4), GA 805 Rev PL4 (Unit Type 5), GA 806 Rev PL4 (Unit Type 6), GA 808 Rev PL4 (Unit Type 8), GA 809 Rev PL4 (Unit Type 9), GA 810 Rev PL4 (Unit Type 10), GA 811 Rev PL4 (Unit Type 11 GF), GA 811a Rev PL3 (Unit Type 11 1F), GA 811b Rev PL3 (Unit Type 11 2F), GA 812 Rev PL4 (Unit Type 12 GF), GA 812a Rev PL3 (Unit Type 12 1F), GA 812b Rev PL3 (Unit Type 12 2F), GA 813 Rev PL4 (Unit Type 13), GA 814 Rev PL4 (Unit Type 14 GF), GA 814a Rev PL3 (Unit Type 14 1F), GA 815 Rev PL4 (Unit Type 15), GA 816 Rev PL4 (Unit Type 16), GA 817 Rev PL4 (Unit Type 17), GA 818 Rev PL4 (Unit Type 18), GA 819 Rev PL4 (Unit Type 19), GA 820 Rev PL4 (Unit Type 20), GA 821 Rev PL4 (Unit Type 21), GA 822 Rev PL4 (Unit Type 22), GA 823 Rev PL4 (Unit Type 23 GF), GA 823a Rev PL3 (Unit Type 23 1F), GA 824 Rev PL4 (Unit Type 24), GA 825 Rev PL4 (Unit Type 25), GA 826 Rev PL4 (Unit Type 26 1F), GA 826a Rev PL3 (Unit Type 26 2F), GA 140 Rev PL (As Proposed Green Lane/Rhodes Moorhouse Court Junction), GA 512 Rev PL1 (As Proposed Block 1 Detail Elevation Study), GA 522 Rev PL3 (As Proposed Block 2 Elevations), GA 523 Rev PL1 (As Proposed Block 2 Detail Elevation Study), GA 543 Rev PL1 (As Proposed Block 4 Detail Elevation Study).

And the following submitted plans:

- Aboricultural Impact Assessment, Aboricultural Method Statement and Tree Protection Plan dated April 2016;
- Design and Access Statement Rev A undertaken by Haines Phillips

Architects dated August 2016;

- Ecological Appraisal of land at Hill Top and Rhodes Moorhouse Court, Haig Estate, Morden undertaken by Crossman Associates ref: RIII8.0011 Issue 4 dated 29 March 2016;
- Environmental reptile survey report undertaken by June 2016 Middlemarch Environmental ref: RT-MME 122471
- Flood Risk Assessment undertaken by Stuart Michael Associates Limited reference number 5410-FRA Issue 01 dated April 2016 (Amended August 2016);
- Proposed Landscape Concept Plan for Central Green Space & Trenchard Court Gardens prepared by Haines Phillips Architects (Drawing No: 3854 SK 1, 3854 SK 2, 3854 SK 3, 3854 SK 4, 3854 SK 5 & 3854 SK 6);
- Transport Statement undertaken by JMP Consultants, reference ST16368-1/3 dated 11 August 2016;
- Foul and Surface Water Drainage Strategy undertaken by Stuart Michael Associates SMA Ref: 5410-DS Issue: 02 dated August 2016;

2. B1: External Materials to be Approved
3. B4: Details of surface treatment
4. C07: Refuse & Recycling (Implementation)
5. C09: Balcony/Terrace Screening

No part of the development shall be occupied until details for the screening of the balconies of Unit 68 (screening to southern side elevation) and Units 63 & 67 (screening to south-eastern side elevation) has been submitted for approval to the Local Planning Authority. The development shall not be occupied unless the scheme has been approved and implemented in its approved form and those details shall thereafter be retained for use at all times from the date of first occupation.

6. D10: External Lighting
7. D11: Construction Times
8. F01: Landscaping/Planting Scheme (Details to be submitted)
9. F05: Tree Protection

Tree Protection: The details and measures for the protection of the existing retained trees as contained in the approved document 'Arboricultural Impact Assessment Arboricultural Method Statement Tree Protection Plan for Haig Estate, Morden SM4 5BJ' dated April 2016 shall be fully complied with. The approved methods for the protection of the existing retained trees shall follow the sequence of events as detailed in the document and as shown on the drawing titled 'Tree Protection Plan' numbered '160415-HHE-TPP-LI & AM'

and shall be retained and maintained until the completion of all site operations.

Reason: To protect and safeguard the existing trees in accordance with the following Development Plan policies for Merton: policy 7.21 of the London Plan 2015, policy CS13 of Merton's Core Planning Strategy 2011 and policies DM D2 and 02 of Merton's Sites and Policies Plan 2014.

#### 10.F06: Design of Foundations

No work shall be commenced until details of the proposed design, materials and method of construction of the foundations to be used within the root zone of the Oak tree listed as T7 in the arboricultural report shall be submitted to and approved in writing by the LPA and the work shall be carried out in accordance with the approved details. Such details shall include further arboricultural measures for the protection of the Oak tree and shall take the form of an addendum report to the approved Arboricultural Method Statement and Tree Protection Plan.

Reasons: To protect and safeguard the existing retained Oak tree in accordance with the following Development Plan policies for Merton: policy 7.21 of the London Plan 2015, policy CS13 of Merton's Core Planning Strategy 2011 and policy O2 of Merton's Sites and Policies Plan 2014.

#### 11.F08: Site Supervision (Trees)

#### 12.H07: Cycle Parking to be implemented

#### 13.H08: Residential Travel Plan

#### 14.H11: Parking Management Strategy

#### 15.H13 Construction Logistics Plan

#### 16.Non-Standard Condition

No development approved by this permission shall be commenced until a scheme for the provision of surface water drainage has been implemented in accordance with details that have been submitted to and approved in writing by the local planning authority. Before these details are submitted an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system (SuDS) to ground, watercourse or sewer in accordance with drainage hierarchy contained within the London Plan Policy 5.13, Merton's Policy DM F2 and the advice contained within the National SuDS Standards. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- i. provide information about the design storm period and intensity, the method employed to delay and control the rate of surface water discharged from the

site to no more than 1.4l/sec for Area A and 3.7l/s for Area B, as shown in the indicative drainage strategy. These details shall detail the measures taken to prevent pollution of the receiving groundwater and/or surface waters;

ii. include a timetable for its implementation;

iii. include a CCTV survey of the existing surface water connection to the main sewer and site wide drainage network to establish its condition is appropriate; and

iv. provide a drainage management and maintenance plan for the lifetime of the development.

Reason: To ensure satisfactory means of surface water drainage, to reduce the risk of flooding and to comply with the following Development Plan policies for Merton: policy 5.13 of the London Plan 2011, policy CS16 of Merton's Core Planning Strategy 2011 and policy DM F2 of Merton's Sites and Policies Plan 2014.

17. No development shall take place until a Demolition and Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the demolition and construction period. The Statement shall provide for:

- hours of operation
- the parking of vehicles of site operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials used in constructing the development
- the erection and maintenance of security hoarding including decorative - displays and facilities for public viewing, where appropriate
- wheel washing facilities
- measures to control the emission of noise and vibration during construction.
- measures to control the emission of dust and dirt during construction/demolition
- a scheme for recycling/disposing of waste resulting from demolition and construction works

Reason: To ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and to comply with the following Development Plan policies for Merton: policies 6.3 and 6.14 of the London Plan 2015, policy CS20 of Merton's Core Planning Strategy 2011 and policy DM T2 of Merton's Sites and Policies Plan 2014.

18. Non-Standard Condition

Prior to the occupation of the development hereby permitted, bird boxes shall be implemented in accordance with the recommendation of paragraph 4.7 of the 29 March 2016 Crossman Associates Ecology Appraisal.

Reason: To protect and safeguard the existing biodiversity accordance with the following Development Plan policies for Merton: policy 7.21 of the London Plan 2015, policy CS13 of Merton's Core Planning Strategy 2011 and policy

19. Non-standard condition

No development above ground hereby approved shall commence until details of the design of the play space have been submitted to and approved in writing by the Local Planning Authority. The approved play space shall be fully implemented and made available for use prior to the first occupation of the development and thereafter retained for use at all times.

Reason: To ensure a satisfactory provision of play space for future residents in accordance with the following Development Plan policies for Merton: The London Plan policy 3.6, Merton's Core Planning Strategy policy CS 13 and the Mayor of London's 'Play and Informal Recreation' SPG 2012.

20. Non-standard condition

No part of the development hereby approved shall be occupied until evidence has been submitted to and approved in writing by the Local Planning Authority, confirming that the development has achieved not less than the CO2 emissions reductions outlined in Policy 5.2 of the London Plan (35% improvement on Part L 2013 Building Regulations), and internal water usage rates of no greater than 105l/p/day (equivalent to Code for Sustainable Homes Level 4) - Evidence requirements are detailed in the "Schedule of Evidence Required - Post Construction Stage" under Category 1: Energy and Carbon Dioxide Emissions (ENE1: dwelling emissions rate) and Category 2: Water (WAT1: Indoor water use) of the Code for Sustainable Homes Technical Guide (2010).

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources and to comply with the following Development Plan policies for Merton: policy 5.2 of the London Plan 2011 and policy CS15 of Merton's Core Planning Strategy 2011.

21. NPPF Informative

22. Drainage Informative

It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off-site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of ground water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required (contact no. 0845 850 2777).

23. Contaminated Land Informative

If during construction works contamination is encountered The Council's Environmental Health Section shall be notified immediately and no further development shall take place until remediation proposals (detailing all investigative works and sampling, together with the results of analysis, risk assessment to any receptors and proposed remediation strategy detailing proposals for remediation) have been submitted to and approved by the Local Planning Authority This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

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Please [click here](#) for full plans and documents related to this application.

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