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Eastfields Estate, Merton

Case for Regeneration

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1. Introduction

Background to Eastfields Estate

- 1.1 The Eastfields Estate is located towards the east of the London Borough of Merton (LBM), within the Figges Marsh ward. Broadly rectangular in shape, the Estate sits to the north west of Streatham Park Cemetery and is bounded by Acacia Road / Mulholland Close to the north west and Clay Avenue to the east, south and west. Mitcham Eastfields Railway Station is around 5 minutes walk to the west of the Estate.
- 1.2 Originally constructed in the late 1960s to early 1970s, ownership and management of the Estate was acquired by Circle Housing Merton Priory (CHMP), who are part of the wider Circle Housing Group, in 2010 as part of a Housing Stock Transfer Agreement (HSTA) containing all LBM's council housing stock within Merton, totalling circa 9,500 units.
- 1.3 The Estate currently comprises 466 dwellings, comprising a mix of three storey town houses and flatted blocks. The site is laid out with residential blocks on the perimeter of the rectangular site and communal amenity space to the centre. The properties include a mix of tenures including private ownership (as a result of right to buy) and social rent.
- 1.4 The Estate is in a predominantly residential area, where the scale of built development surrounding the site varies considerably. The exceptions to this are the two storey St Marks Academy and playing areas, located to the north of the site, and the Cemetery to the south. The built development to the west of the site is predominantly terraced and detached houses of two to three storeys.
- 1.5 There are no non-residential land uses on the site at present.
- 1.6 The Estate area totals approximately 6.7 hectares.

Circle's Vision

- 1.7 CHMP, as part of the wider Circle Housing Group, are one of the biggest Housing Associations in the UK. They strive to do more than just build and manage affordable housing. As an organisation they are firmly committed to seeking to improve and enhance the life chances of their residents and their household members whilst increasing the supply of affordable housing in Merton. This includes the aspiration to address all types of inequality as well as disadvantage

in health, employment and training, educational attainment, social and economic disadvantage, financial inclusion and the long term sustainability of the homes under their ownership and management.

1.8 When CHMP acquired responsibility for the Eastfields Estate, as well as all other LBM council housing stock in 2010, CHMP committed to improving the quality of accommodation to at least Decent Homes Merton Standard¹ by 2015 to improve the quality of life for residents of the Estate. However, in working towards this goal, CHMP discovered from initial stock condition surveys and financial planning work that significant refurbishment and maintenance work as well as financial investment was required to achieve the necessary standard due to a history of reactive repairs rather than proactive or comprehensive refurbishment. CHMP therefore began a comprehensive review exercise across all their estates within the Borough to determine whether it might be more beneficial and sustainable to replace homes in the poorest condition with new properties, giving consideration to the condition of the properties over a 50 year period based on the length of CHMP's financial modelling.

1.9 This process began with analysis of all the CHMP Estates in Merton to determine the impact that upgrading homes to Decent Homes Merton Standard would have. This included consideration of:

- Capacity of existing stock to meet current and future housing needs (e.g. overcrowding, older people, demand for adapted properties, etc.);
- Condition of the existing stock and historic / projected maintenance issues and costs;
- Community safety and reported crime; and
- Indices of deprivation, including super output area level identification of areas in decline.

1.10 This work was then augmented by further reviews based on the deliverability of potential regeneration programmes on each of the estates. This review included:

- Scope for increasing the number of homes on site;
- Access and site constraint issues;
- Income generation potential and future sales values and demand;
- Contribution to future housing supply; and
- Proximity to public transport and other infrastructure.

1.11 These two work streams were then combined and clearly identified Eastfields, Ravensbury and High Path as the three Estates within CHMP's ownership with the most viable regeneration potential.

¹ As defined within the HSTA.

- 1.12 This offers the opportunity for CHMP to explore the potential for creating new, high quality and sustainable affordable housing for the people of Merton, through the regeneration of the existing accommodation at the Eastfields Estate. This in turn, would significantly enhance the lives of the residents on the Estate, helping to overcome inequalities faced by those living within the existing poor quality housing. Further, it would enable the delivery of wider regeneration benefits to the surrounding area.
- 1.13 The same type of scrutiny and approach is being taken forward for the Ravensbury Estate in Morden and High Path Estate in South Wimbledon in parallel with Eastfields.

The Purpose of this Document

- 1.14 Having identified an opportunity to explore the potential for more comprehensive improvements to the Eastfields Estate, as well as the Ravensbury Estate and the High Path Estate, CHMP have appointed a technical team of specialists to consider in greater detail whether regeneration is the best option.
- 1.15 The purpose of this document is to set out the findings of the technical work that has been undertaken to date and to demonstrate the economic, social and environmental arguments for and against the “Case for Regeneration” of the Eastfields Estate, whilst giving equal consideration to reasonable alternative options.
- 1.16 Whilst this document has no formal status or independent statutory weight, it has been developed to form part of the evidence base for LBM’s emerging Estates Plan Development Plan Document (DPD) which will set out the planning policy framework against which regeneration proposals for the Estate will be assessed as part of any future planning application. Therefore, this Case for Regeneration is intended to be an important consideration at the independent examination of the DPD to assist the Inspector in the assessment of whether the submitted DPD is prepared in accordance with legal and procedural requirements and whether the plan is sound, as per Section 20(5) of the Planning and Compulsory Purchase Act 2004 and whether it is, as per the National Planning Policy Framework (NPPF) (March 2012) (paragraph 182):
- “*positively prepared*”;
 - “*justified*”;
 - “*effective*”; and
 - “*consistent with national policy*”.

Format of Document

1.17 In order to consider the areas identified above, this document is structured as follows:

- **Section 2** examines the current condition of the housing stock as well as looking at housing need for market and affordable housing across the Borough.
- **Section 3** sets out the three refurbishment and regeneration options considered within this document.
- **Section 4** considers the planning policy context at the national, regional and local levels, against which the options must be considered.
- **Section 5** appraises the options against a range of socio-economic criteria.
- **Section 6** conducts a similar appraisal for a range of environmental and place making criteria.
- **Section 7** provides a summary of the options in terms of economic considerations.
- **Section 8** reviews the public consultation that has been undertaken to date.
- **Section 9** provides the conclusions of the report.

1.18 The Case for Regeneration has been informed by various technical assessments and other studies which can be made available on request.

2. Current Position and Condition of Stock

Reasons for Change

- 2.1 Whilst there is a strong community spirit and many of the residents of the Eastfields Estate enjoy living on the Estate (evidenced by low turnover of tenants, as well as feedback received from residents, as discussed in greater depth later in this document), the quality and condition of the existing residential stock means that doing nothing is not an option.
- 2.2 As mentioned above, CHMP as per the provisions of the HSTA, are required by LBM to refurbish the existing units to at least Decent Homes Merton Standards. Considered on its own, this would not require the demolition or redevelopment of any existing homes, but it would necessitate a significant and expensive programme of works, including new kitchens, bathrooms, doors, windows and other materials and fittings such as insulation and plumbing; however these improvements will not deliver wider sustainability and regeneration benefits. This is discussed in greater detail below.
- 2.3 Accordingly, CHMP considered this to present an opportunity to explore the potential for regeneration of the Estate to deliver new homes that would have a much longer lifespan than refurbishing the existing dwellings, as well as potentially delivering other associated benefits.
- 2.4 These considerations have helped to shape the Options considered within this document and are analysed in greater depth below.

Housing Need within Merton

- 2.5 As explored within section 3 of this document, the NPPF makes it clear that local authorities should act to “*boost significantly the supply of housing*” and use their evidence base to ensure that their Local Plans meets “*the full, objectively assessed needs for market and affordable housing*” (paragraph 47) within their market area.
- 2.6 At a Borough level, Merton faces increasing demand for both private and affordable housing. Whilst a Housing Needs Survey has been conducted for the current residents of the Estate (and will be discussed in greater detail later in this document) it is also important to consider the overall need for housing and affordable housing within the Borough.
- 2.7 The previous London Plan (July 2011) set LBM a minimum 10 year housing target of 3,200 dwellings, equating to a delivery target of 320 dwellings per annum. This target was increased by 28% in March 2015, when the Further Alterations to the London Plan (FALP) were adopted.

The borough is now expected to provide for, and exceed, a minimum of 4,107 additional dwellings (or 411 per annum) over the 10 year plan period until 2025.

- 2.8 Whilst this is an increase, the FALP Inspector's Report did levy criticism that the overall housing target for London within the FALP is at least 6,600 dwellings short of objectively assessed need per annum. The plan was found to be sound, only on the basis that the Greater London Authority (GLA) begins preparation of a new London Plan immediately after the adoption of the FALP. As a result, it could be reasonable to assume that housing targets within the Borough and London will rise again within the next 5 years.
- 2.9 The latest Department for Communities and Local Government (DCLG) household projections to 2039, as published on 12th July 2016, which are identified by National Planning Practice Guidance (PPG) as the starting point for identifying objectively assessed needs for housing, predict an overall household growth of 25,000 (increasing from current population of 84,000 to 109,000) within Merton between 2016 and 2039 (a period of 24 years), which equates to an average increase of 1,041 households per annum, which is over 2.5 times higher than the current FALP target for LBM.
- 2.10 Having regard to the above, there is no doubt that there is a significant need for new housing within the Borough and London as a whole.

Public Consultation

- 2.11 In addition to the technical assessments on the condition of the existing stock (as explained below), CHMP have committed to an extensive programme of public consultation, including existing residents of the Estate, residents of neighbouring properties, businesses and schools to identify their concerns with the current condition of the Estate and the aspirations, opportunities and constraints in relation to creating a better quality living environment at Eastfields Estate.
- 2.12 Between June 2014 and the present, a programme of multiple public consultation events have been held with CHMP's Regeneration Team alongside architects Levitt Bernstein. Feedback from these events has helped to shape the design Options considered within this Case for Regeneration document.
- 2.13 As emerging regeneration proposals develop, CHMP are fully committed to continuing to consult closely with residents and other stakeholders.
- 2.14 Further information on the public consultation process and the feedback gained is included at Section 8 of this document.

Existing Condition of Stock

2.15 CHMP have commissioned a number of independent technical surveys to assess the existing condition of the properties on the Eastfields Estate. Having regard to the surveys undertaken to date, a summary of the stock condition is included below.

Structural Condition

2.16 Ellis and Moore Consulting Engineers Ltd produced a Structural Engineers Report (October 2010) to consider the condition of the existing stock at Eastfields Estate via a visual inspection of external elevations as well as an internal inspection of a selected number of properties.

2.17 The report identifies two types of property within the Estate: three storey town houses and three storey blocks of flats. Both types were built using the Wimpey No Fines method in the late 1960's which was a form of pre-fabricated construction replacing traditional brick or block walls and were then clad by pebble dash render.

2.18 In consideration of the townhouses:

- The Wimpey No Fines method included a cross wall construction with the structure spanning between the party walls. Since their original construction, new enamelled steel panels have been inserted below the window sills and windows have been replaced in recent years.
- Exposed concrete in some areas shows some wear and tear with some fine cracks throughout the Estate, but these are not of structural significance.
- In the front and rear elevations there are signs of corrosion on the steel panels, particularly at corners and also signs of failure of the mastic joints between the panels and the existing concrete.
- At the time of writing, the jointing is satisfactory, but is considered to have a limited lifespan.
- None of the properties appears to be suffering from foundation defects.

2.19 In consideration of the flats:

- Properties were of generally similar condition to the townhouses. There are more steel panels on the flatted blocks as they have been used at ground level below all window sills.
- Similarly, the mastic joints are showing signs of failure.

- 2.20 Generally, the properties appear to be in reasonable structural condition externally, excluding the points noted above and internally, there were no structural defects identified.
- 2.21 Whilst the report concludes that the structure of the buildings would remain in a satisfactory condition for some time, the principle areas of concern are the longevity of the windows and the cladding of the properties. However, continuing to take a reactive approach to repairs to these properties as issues arise would involve significant costs to CHMP over a period of 50 years.

Dwelling Condition Survey

- 2.22 A Condition Survey Report (December 2014) has been prepared by Baily Garner to consider the condition of the existing stock. In preparing this report, Baily Garner surveyed 10 properties, including a mix of houses and flats.
- 2.23 The report concludes that the buildings are generally in fair condition, however many are experiencing various problems including dampness, condensation, corrosion of cladding (as discussed above) and timber decay, with a number of internal and external building components nearing the end of their life expectancy, including roof repairs, remedial works to areas of water ingress, resealing around various cladding areas, window overhauls and asphalt repairs on balconies. Upgrade works, including new kitchen and bathrooms, and potentially boilers, are required for these buildings to meet Decent Home standards.
- 2.24 With regards to internal space standards from the properties surveyed, the 1 bedroom units are 47 sqm, the 2 bedroom units are 69 sqm and the 3 bedroom townhouses are 97 sqm.
- 2.25 Compared to the new Nationally Described Space Standard, introduced by the DCLG on 27th March, and reflected within the draft GLA's draft Housing Standards (Minor Alterations to the London Plan) (May 2015), this makes:
- the existing 1 bedroom flats 3 sqm short of the 50 sqm requirement (for 1 storey 1b2p dwellings);
 - the existing 2 bedroom flats 1 sqm short of the 70 sqm requirement (for 1 storey 2b4p dwellings); and
 - the existing 3 bedroom houses 2 sqm short of the 99 sqm requirement (for 3 storey 3b5p dwellings).
- 2.26 With regard to external private amenity space standards due to the configuration of the accommodation, only some 1 bedroom flats and the 3 bedroom houses have private amenity space. Of the surveyed properties the 1 bedroom flats have an average of 29 sqm and the 3 bedroom houses have an average of 23 sqm. The 2 bedroom flats do not have any private amenity space.

2.27 In order to achieve a 10% internal inspection rate across all unit types, Baily Garner LLP undertook further internal surveys in late 2015 for a number of units on Acacia Road, Clay Avenue, Moore Close, Mulholland Avenue, Pains Close, Potter Close and Thurpp Close. These surveys identified that 20% of kitchens and 38% of bathrooms were deemed old and in poor condition. 46% of electrical installations were both old and inadequate and a further 54% of the boilers contained within units were deemed old and at the end of their life. The general observation indicated that the condition of internal finishes were poor and there were extensive examples of damp and mould issues.

Energy Performance

2.28 An Energy and Sustainability Report for the Eastfields Estate was produced by MLM Consulting Engineers in November 2014. This report gives consideration to the current condition of the stock in terms of the energy performance of walls, roofing and glazing.

2.29 In consideration of the walls, the report found that the external walls are dry lined internally and rendered externally with some properties having weather boarding in place. The current design achieves a U-value of 2.46 W/m².K, which is a significant departure from the requirement for 0.30 W/m².K within Building Regulation Part L1A and L1B 2013 for new build dwellings and refurbishments.

2.30 The roofs, based on an assumed maximum of 50 mm insulation have a U-value of 0.68 W/m².K, which is also a departure from Building Regulation Part L1A and L1B which require U-values of 0.2 W/m².K for new build and 0.18 W/m².K for refurbished dwellings.

2.31 Examining the windows within the properties and based on historical data, the U-value is assumed to be 4.0 W/m².K, which is a significant departure from the Building Regulations Part L1A which specifies a minimum value of 2.0 on new build properties.

2.32 Furthermore, a thermographic survey, undertaken in accordance with BRE Guidance, indicates significant thermal bridges, occurring on end walls, internal corners, communal entrances, windows and at floor slab levels.

2.33 The report concludes that the current condition of the properties places them significantly below the levels required to meet even Decent Homes Standards.

Asbestos

2.34 A full Refurbishment and Demolition Asbestos Survey has not yet been conducted, however Baily Garner consider that from their experience of similar building types, it is likely that the infill

between the steel cladding and the structure may have been filled and insulated with asbestos containing board material properties within the Estate.

3. The Options

3.1 Based on a range of considerations including the requirements within the HSTA and the existing condition of the housing stock at Eastfields Estate, three Options have been identified for consideration within this document.

3.2 These Options are:

- **Option 1 – Refurbishment to Decent Homes (Merton Standard)**

- Refurbish all existing properties owned and managed by CHMP to Decent Homes (Merton Standard) as defined within the terms of the HSTA. This would involve (predominantly internal) works, such as new kitchens, bathrooms, plumbing, electrics and insulation) to improve the quality of the existing accommodation.

- **Option 2 – Refurbishment to an Enhanced Standard;**

- Refurbish all existing properties owned and managed by CHMP to a standard above Decent Homes. This would involve a programme of works both internal improvements (such as new kitchens and bathrooms) and external works (such as new building cladding and roofs to improve thermal performance).

- **Option 3 – Full Redevelopment**

- Demolition of all existing properties on the Estate and redevelopment of the site to deliver higher density, new modern, energy efficient and high quality homes, alongside a new community space, open space, landscaping and car parking.

3.3 No consideration has been given to a “do nothing” approach. Aside from CHMP’s own commitments to improving the quality of life of its tenants, under the provision of the HSTA with LBM, CHMP are legally bound to refurbish the condition of the existing stock at Eastfields Estate as a minimum. This means that do nothing is not a justifiable choice that is open to CHMP and accordingly, it is not considered further within the rest of this document.

3.4 Following consideration, CHMP have taken the decision not to consider an Option for the partial regeneration of Eastfields Estate, i.e. demolishing some properties to make way for redevelopment as well as retaining some existing properties for refurbishment. This decision has been taken as a result of a number of site specific factors. Firstly, all the existing stock at Eastfields was built at the same time and is all broadly of the same condition. Therefore there are no parts of the existing Estate that would require less investment to keep as refurbished

properties. Secondly, the layout and urban design of the existing Estate is identified (as discussed below) as being poor and retaining any of the existing properties would not offer the best opportunity to deliver a high quality residential development that optimises the use of the land within the Estate. Therefore, it is not considered that a partial regeneration would be “justified” or “effective” and would therefore not meet the soundness tests of paragraph 182 of the NPPF.

3.5 The following sections of this document consider the pros and cons of each of the Options above against the following range of criteria to consider whether there is a Case for Regeneration. The content of these sections has been informed by the key recommendations for an effective decision-making process, as set out within the London Assembly’s “*Knock it Down or Do it Up? The Challenge of Estate Regeneration*” published in February 2015.

- **Planning Policy**
 - Including the policy backdrop at national, regional and local levels for the provision of good quality residential accommodation and regeneration.

- **Socio-Economic Factors**
 - Including housing needs of existing residents, socio-economic assessment and economic benefits.

- **Environmental and Place Making Factors**
 - Including social infrastructure and non-residential land uses, urban design, sustainability, energy, flood risk and geotechnical and geoenvironmental issues.

- **Economic Considerations**
 - Including commentary on the economic consideration of each Option based on information within ongoing financial modelling work being undertaken by CHMP.

- **Public Consultation**
 - Including a summary of the extensive public consultation exercises, and the feedback received, that have taken place to understand existing residents’ lived experience and their aspirations for the Estate.

3.6 Once each of these areas have been covered in turn, our conclusions section provides a summary.

4. Considering the Options: Planning Policy Context

Introduction

- 4.1 The purpose of this section is to provide a high level overview of the policy backdrop at national, regional and local levels, against which the Options for the Eastfields Estate must be considered.

National Policy

- 4.2 At a national level, the principal policy document is the NPPF, and the associated up-to-date guidance provided within the PPG, both published by the DCLG.
- 4.3 The “*golden thread*” of the NPPF in terms of both plan-making and decision-taking is a presumption in favour of sustainable development (paragraph 14). Sustainable development is defined as having three dimensions: economic, social and environmental. Focussing on the social role, sustainable development should help to support “*strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being*” (paragraph 7).
- 4.4 The NPPF (paragraph 47) states that local authorities should act to “*boost significantly the supply of housing*” and use their evidence base to ensure that Local Plan documents meet “*the full, objectively assessed needs for market and affordable housing.*”
- 4.5 The NPPF goes on to state, at paragraph 50, that in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should “*plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community ...*”
- 4.6 Section 7 of the NPPF (paragraphs 56 to 68), ‘Requiring Good Design’, emphasises the importance of good design as a “*key aspect of sustainable development*” and acknowledges its ability to contribute positively to making places better for people. This is closely linked to Section 8 (paragraphs 69 to 78), ‘Promoting Healthy Communities’, which requires planning policies and decisions to aim to achieve places which promote opportunities for interaction between different groups within the community, safe and accessible environments where crime

and disorder and the fear of crime, do not undermine quality of life or community cohesion, and safe and accessible developments containing high quality public space.

- 4.7 Paragraph 111 states that planning policies and decisions should “*encourage the effective use of land by re-using land that has been previously developed (brownfield land)*” provided it is not of high environmental value.
- 4.8 In summary, national policy is clear that steps should be taken to increase the supply, choice and quality of housing; and for that reason Option 3 (full regeneration) is considered to be significantly more beneficial than Options 1 and 2, as it is the only one that would materially increase the quantity and improve the choice of residential accommodation, alongside improvements to the quality of the external environment across Eastfields Estate.

Regional Policy

- 4.9 At a regional level, the most recent version of the London Plan (March 2016, consolidated with alterations since 2011) published by the GLA, sets the strategic framework for planning within London and it forms part of the Development Plan for the Estate. It is therefore an important consideration in the Case for Regeneration.
- 4.10 Linked with setting the housing targets for all London Boroughs, as discussed above, the London Plan (paragraph 1.48) recognises the need to plan for substantial population growth to ensure that London “*has the homes, jobs services, infrastructure and opportunities a growing and ever more diverse population requires*” in ways that “*do not worsen quality of life for London as a whole*” and “*make the best use of land that is currently vacant or under-used.*”
- 4.11 Policy 2.14, ‘Areas for Regeneration’, states that “*Boroughs should identify areas for regeneration and set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing, in locally-based plans, strategies and policy instruments such as LDFs and community strategies. These plans should resist loss of housing, including affordable housing, in individual regeneration areas unless it is replaced by better quality accommodation, providing at least an equivalent floorspace.*”
- 4.12 Acknowledging that “*London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs and at prices they can afford*” (Paragraph 3.13) Policy 3.3, ‘Increasing Housing Supply’, seeks Boroughs to achieve and exceed the relevant minimum housing target, as discussed above. In particular, to boost housing supply, the same Policy urges Boroughs to look towards the potential to realise brownfield housing capacity through a series of measures including intensification and sensitive renewal of existing residential areas.

- 4.13 Policy 3.4, 'Optimising Housing Potential', states that taking into account local context and character, "*development should optimise housing output*" and proposals which compromise this "*should be resisted.*"
- 4.14 Policy 3.8, 'Housing Choice', emphasises that "*Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.*"
- 4.15 Policy 3.9, 'Mixed and Balanced Communities', extends this message and emphasises that "*communities mixed and balanced by tenure and household income should be promoted across London ... which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods.*" The same policy goes on to state that "*A more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.*"
- 4.16 Policy 3.14, 'Existing Housing', states that Borough should "*promote efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings.*" The supporting text to this Policy notes that existing housing should be retained where possible and appropriate, except where there are acceptable plans for its replacement. It also states that estate renewal should take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area, and the amount of affordable housing intended to be provided elsewhere in the Borough. Where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing.
- 4.17 Furthermore, the GLA's Housing Supplementary Planning Guidance (SPG) (March 2016) reinforces the point that there should be an equivalent level of affordable housing floorspace provided as part of any regeneration (Paragraph 5.1.18). Importantly, Paragraph 5.1.16 supports the provision of market housing on estate renewal schemes by stating that "to achieve no net loss, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision, or to achieve a more mixed and balanced community."
- 4.18 Policy 7.7, 'Location and Design of Tall and Large Buildings', states that Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. They should not unacceptably harm their surroundings and should make a significant contribution to local regeneration.

4.19 In summary, regional policy seeks to optimise sites to boost the supply of housing whilst offering a greater diversity of tenure and improving the quality of accommodation. All Options considered within this report would increase the quality of residential accommodation being offered; however, only Option 3 would assist with increasing quantity, mix and quality of the external environment. Therefore, Option 3 is considered to be the most preferable in terms of regional policy. Regional policy also supports local authorities in identifying regeneration areas to deliver such objectives. For Eastfields Estate, as well as High Path and Ravensbury, this would be done through the emerging Estates Plan DPD.

Local Policy

4.20 LBM's principal Development Plan Documents (DPDs) are their Core Planning Strategy (July 2011) and their Sites and Policies Plan (July 2014).

4.21 Paragraphs 5.2 and 5.3 of the Core Strategy identify that inequalities within Merton, including housing choices, need to be reduced and that a joined up approach with physical regeneration and other measures outside of planning will help to do this. Regeneration is specifically highlighted in the areas of Mitcham and Morden as having the ability to increase opportunities, improve people's quality of life, including housing choice, economic vitality, health facilities and the quality of the environment in the east of the Borough.

4.22 This is carried through into Strategic Objective 3 of the Core Strategy, which is "*To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space.*" This will be achieved by a range of actions including through the delivery of higher density new homes that respect and enhance the local character of the area.

4.23 Eastfields Estate, although not specifically designated within the Sites and Policies Plan for any particular land use, does fall within the Mitcham Sub-Area of the Core Strategy where it is generally identified as a residential area. Core Strategy Policy CS2, although relating principally to Morden Town Centre, does note that within the wider surrounding area, the Council seeks to improve the overall environment by providing quality shopping, housing, community facilities and good transport links. This includes improving the quality and mix of homes including affordable and private housing, enhancing the quality of urban design and architecture and permitting development that makes a positive visual impact to the overall surroundings.

4.24 Core Strategy Policy CS9, 'Housing Provision', states that LBM will support the provision of well designed housing located to create socially mixed and sustainable neighbourhoods, including the redevelopment of poor quality existing housing and not supporting proposals that result in a net loss of residential units, or net loss of affordable housing units.

4.25 In summary, LBM's adopted policy documents are supportive of the delivery of new homes via the redevelopment and regeneration of existing poor quality housing within existing residential areas to create more mixed and balanced neighbourhoods. For this reason, Option 3 is considered to offer the most appropriate strategy in terms of local policy.

Conclusions

4.26 As summarised above, Option 3 is considered to be the most appropriate in terms of delivering key policy objectives at national, regional and local levels as it is the only Option that is able to deliver significant increases in the quality and quantity of residential accommodation, as well as improvements to the general environment of the Eastfields Estate. Option 3 should therefore be considered as "positively prepared", "justified" and "consistent with national policy" (as discussed above, in particular NPPF paragraph 47 and 50). Whilst Options 1 and 2 would improve the quality of the existing stock, the longevity of the improvements would be limited before the condition begins to decline again (and significant further investment is required again). Refurbishment works alone offer very limited potential to optimise the housing potential of the Eastfields as a whole.

4.27 The general principle of estate regeneration in London is already supported by regional policy, and encourages the London Boroughs to identify specific opportunities through their development plans. Therefore, this gives LBM the opportunity to create site specific policy support for the regeneration of Eastfields Estate (alongside High Path and Ravensbury) within the emerging Estates Plan DPD.

4.28 The first stage of this emerging document was a public consultation held between September and November 2014, during which LBM invited residents, businesses and any other interested parties for their views on emerging proposals for the three Estates.

4.29 Following on from Stage 1 consultation of the emerging Estates Plan DPD, using the background research, responses and other key considerations (e.g. national and regional planning policies) LBM has drafted the Estates Local Plan DPD to guide regeneration proposals that may come forward for the three estates. Subsequently, LBM has undertaken Stage 2 consultation from 1st February 2016 to 18th March 2016 on the proposed Estates Plan DPD.

4.30 More details on this process and the responses received by LBM are available on the Authority's website, on the Estates Plan page².

² <http://www.merton.gov.uk/environment/planning/planningpolicy/localplan/estatesplan.htm>

5. Considering the Options: Socio-Economic Factors

Introduction

- 5.1 Having examined the policy backdrop for considering the Options, this section of the document now turns to consider the costs and benefits of each Option against a range of socio-economic factors.

Housing Needs

Wider Context

- 5.2 One of the key messages in both planning policy and within CHMP's vision is to provide good quality homes that meet the needs of the local population for both market and affordable housing. As illustrated above, this is set against a backdrop of increasing housing need within Merton, and the wider London region.
- 5.3 To get a better understanding of the housing need of the existing residents within the Estate and to determine whether the current accommodation is suitable to meet current and future housing needs with regard to size, tenure and specification, CHMP commissioned HDH Planning and Development Ltd to prepare a Housing Needs Study (March 2015).
- 5.4 The existing dwelling stock within Eastfields Estate is 54.1% affordable housing and comprises the following overall size mix:
- 30.8% - 1 bedroom;
 - 25.3% - 2 bedrooms;
 - 40.7% - 3 bedrooms; and
 - 3.1% - 4 or more bedrooms.
- 5.5 It is however worth noting that the affordable accommodation is notably smaller on average than the market housing within Eastfields. Whilst 71.2% of the market properties are 3 bedrooms in size, 75.8% of the affordable accommodation is 1 bedroom in size.
- 5.6 With the report indicating that the mean gross annual household income in Eastfields is £25,847, which is 39.7% below the London equivalent (£42,878), it is clear that there is still a significant need for affordable housing, particularly set against a 35% rise in mean property prices within LBM between 2008 and 2013 and an average price gap between social rent and

market rent properties of 187.3% across properties of 1 to 4 bedrooms within the Eastfields area.

Existing Affordable Housing Need within the Estate

- 5.7 Turning specifically to affordable housing need within the Eastfields Estate, Table 4.1 of the Housing Needs Study indicates that there is a current total of 252 existing households within the Estate who live in unsuitable housing. The most common specific reason for unsuitability of existing accommodation is overcrowding, which, as recognised within the PPG, indicates a need for more housing units.

Newly Arising Affordable Housing Need

- 5.8 HDH estimate that, using authority-wide household formation rates, 11 new households will form per year from the existing population of the Eastfields Estate, which represents a household formation rate of 2.3%. Assuming that these households will be of a similar composition as the profile for new households recorded in the English Housing Survey, 90.9% of these households would be unable to afford market housing in the Eastfields area. Whilst these households are likely to include some single person households aged 35 and under, which are deemed suitable to form part of a shared household should affordable accommodation not be available for them, this does again indicate a requirement for affordable housing better suited to current requirements within the local area.
- 5.9 Furthermore, on the basis of the PPG guidance on deriving existing households falling into affordable housing need, a comparison of waiting lists across Merton between 2011 and 2014 indicate that there is an average additional 910 households per year requiring affordable housing. Proportionally applied to the Eastfields area, this indicates a newly arising need of 20 households per year within the study area.

Availability of Affordable Housing

- 5.10 CHMP reports a vacancy rate of just 0.2% within its stock, which indicates there is no practical opportunity to bring any vacant dwellings back into occupation to meet affordable housing needs from the existing stock.
- 5.11 Turnover is relatively low within the social rented units within Eastfields Estate, with on average just 17 lettings becoming available each year, based on trends from 2011 to 2014.
- 5.12 With regard to intermediate housing, no stock is currently available at the Estate.

Conclusions

- 5.13 From the assessment work undertaken by HDH it is evident that the housing needs of the existing residents of the Eastfields Estate are very different to the volume of units and mix of properties that are currently within the Estate. The scale of the current and future housing need identified by HDH leads to indicate that Option 3 (full redevelopment) is the best option for meeting housing needs. Taking this longer term view and looking to address future growth in housing needs would also help to reduce pressure on equivalent housing stock in other parts of the Borough.
- 5.14 Fundamentally, the findings of the report leads HDH to conclude that if specific and identified housing needs of the existing residents are to be met over the next twelve years, new affordable homes should be built on Eastfields Estate including help-to-buy, shared ownership, affordable rent and social rent.
- 5.15 From this assessment it is clear that Option 3 (full regeneration) is the preferred option in terms of meeting existing and future housing needs, as it is the only Option that allows both an increase in the quality and quantity of housing on the Estate. It also allows the size and tenure mix of the affordable housing within the Estate to be tailored to meet existing and projected housing needs, rather than relying on stock designed to meet needs within the late 1960s and 1970s. This makes it the most “positively prepared”, “justified” and “consistent” Option of the three. Whilst there could be an opportunity under Options 1 and 2 for CHMP to rebalance the tenure mix within the Estate, refurbishment alone does not provide any scope for increasing the overall volume of the accommodation or altering the mix of unit sizes.
- 5.16 In conclusion, it is considered that Option 3 is preferable to both Options 1 and 2 for meeting existing and future housing needs.

Socio-Economic Profile of the Estate

- 5.17 Peter Brett Associates (PBA) were instructed by CHMP to produce a Socio-Economic Analysis Report (July 2015) to consider the wider socio-economic effects that refurbishment and regeneration could have.

Baseline

- 5.18 The following baseline figures are identified within the Report:
- Only 66% of adults of working age in the Estate are economically active, compared to the Figges Marsh ward as a whole at 74%.

- Net weekly household income (after housing expenses) is around £400 compared to a national average of about £423.
- According to the Census (2011), just over 22% of people within the Lower Super Output Area hold no qualifications, which is significantly above the LBM average of 6%.
- At Lower Super Output Area level, Eastfields ranks as within the top 20% most deprived output areas nationally in terms of the quality of living environment, however within London, Merton is within the top five least deprived Boroughs.

5.19 The Analysis Report also notes that the site is relatively well served by social infrastructure including schools, health and leisure and community facilities.

5.20 The Report concludes that regeneration (Option 3) is likely to have a positive effect on socio-economic inequalities identified above. Regeneration allows an increased volume of purpose built housing stock to be built which could play a significant role in reducing deprivation levels. The opportunity to diversify housing mix, type and size to meet current needs means that a broader cross section of needs of various groups within the community, including young people, elderly and vulnerable groups can be met locally, without them needing to move away to find suitable accommodation. It should also be noted that regeneration offers the greatest opportunity to give more detailed consideration to positive health impacts of living in better quality residential accommodation through the evolution of the regeneration proposals, taking account of the Mayor's Social Infrastructure SPD (May 2015).

5.21 Whilst Options 1 and 2 would also have a positive benefit through their refurbishment of the existing accommodation, maintaining the same unit numbers and sizes albeit at a better quality will improve quality of life for residents and is likely to reduce levels of deprivation, they do not offer the same levels of benefits.

5.22 Accordingly, it is considered that Option 3 presents the greatest benefit in terms of improving socio-economic conditions for existing residents of the Estate.

Economic Benefits

5.23 PBA's Socio-Economic Analysis Report also gives consideration to wider economic benefits for the local area as a result of the Options.

5.24 During the refurbishment of the existing properties within Options 1 and 2, jobs would be created within the local area positively impacting a variety of residents in the local area, predominantly in trades and services including the potential for apprenticeships for young people to boost skills and qualifications. During this programme of refurbishments, local businesses such as cafes and shops are likely to benefit from a larger customer base and increased consumer expenditure.

- 5.25 Option 3 also offers this benefit, but due to a more comprehensive programme construction over a number of years, rather than just refurbishment, the extent of the benefits are likely to be much more significant, opening up job opportunities to managerial and supervisory construction positions for more experienced members of the workforce, over a longer period of time.
- 5.26 The creation of new and additional units and floorspace would provide LBM with funds via the New Homes Bonus, as well as S106 and the Community Infrastructure Levy (CIL) which could be used to fund new facilities or improvements to existing infrastructure within the area, to the benefit of local and wider borough residents, including education provision, leisure centres, libraries, open space improvements and Tramlink improvements and extensions.
- 5.27 Similarly an increase in overall unit numbers, as well as an increase in the quantity of private accommodation is likely to boost local spending power and trigger increased demand for local amenities and facilities such as cafes, restaurants and shops to cater for local demand.
- 5.28 For these reasons, Option 3 is considered to be preferable to both Options 1 and 2.

Disruption to Residents

- 5.29 CHMP are giving active consideration to how disruption can be reduced to the estate residents. All three Options would result in disruption to existing residents during construction works. Whilst Option 3 is likely to result in the most disruption as a result of the need for resident decant and the length of the construction programme, a detailed decanting strategy is being devised through consideration of phasing and housing needs. This will ensure that the decant strategy minimises the need for residents to move away, and to double decant; therefore, minimising disruption. Options 1 and 2 would still result in disruption to residents whilst works are being undertaken.

Conclusions

- 5.30 Taking into account wider socio-economic factors, including housing need, socio-economic indicators including deprivation as well as economic benefits through increased spending power, the analysis above is clear that Option 3 is preferable to Options 1 and 2 and represents the most “justified” strategy that is “positively prepared” to meet objective assessed development requirements. Principally this is driven by the benefits associated to increasing the quality and quantity of accommodation, and not just refurbishing the existing affordable housing stock which is becoming increasingly outdated and failing to meet current and future housing needs. Although development will come at a financial cost to CHMP, as will be discussed later, it also brings multiple benefits to the Estate residents and wider local community in terms of job

opportunities, increased spending power and funds for the improvement of local services and facilities.

- 5.31 It should also be noted that many of the houses have been sold as freeholds without any repair covenant in place, despite having shared roofs and services. This could have significant cost implications for some owners if a refurbishment Option (1 or 2) is undertaken, rather than the full regeneration Option (3).

6. Considering the Options: Environmental and Place Making Factors

Introduction

- 6.1 Continuing broadly in line with the recommendations from the London Assembly's 2015 report, this document now turns to examine the costs and benefits of each Option in terms of a range of environmental and place making factors.

Social Infrastructure and Non-Residential Land Uses

- 6.2 At present the Eastfields Estate does not contain any non-residential land uses.
- 6.3 Given that the focus of funding within Options 1 and 2 would be towards the refurbishment of the existing residential properties, neither of these Options would include the creation of any new non-residential land uses such as the introduction of any community space.
- 6.4 Given the proximity of local shops and other facilities and services, Option 3 does not propose to introduce a wide range of non-residential land uses into the Estate, however, consideration is being given to the creation of new community / commercial space of circa 275 sqm to help to meet the needs of the residents of the Estate and neighbouring properties³.
- 6.5 As discussed in the previous section in consideration of socio-economic factors, the creation of new residential floorspace would also provide LBM with funds via the New Homes Bonus, as well as S106 and the Community Infrastructure Levy (CIL) which could be used to fund the provision of new or improvements to existing social infrastructure within the area, to the benefit of all local residents (on and off the Estate).
- 6.6 On this basis, only Option 3 offers the opportunity to deliver the provision of non-residential, community / commercial floorspace within the Estate to contribute towards meeting local needs. For this reason, Option 3 is considered to be preferable to both Option 1 and 2, for both the residents of the Estate and for the wider local population.

Urban Design

- 6.7 Sue McGlynn Urban Design Ltd (SMUD) were commissioned by CHMP to produce an Urban Design Review Study (February 2015) to consider the quality of the built environment within the

³ Subject to the necessary sequential and / or impact assessments.

Eastfields Estate against established principles of urban design, excluding valued judgements on aesthetic or architectural styles.

- 6.8 Given that the works proposed under Options 1 and 2 would not involve any works altering the layout or amenity space associated to the properties within the Estate, they are not considered to have any material effect on the urban structure, layout or quality of the external environment. For these reasons, Options 1 and 2 are not considered in detail within this section.

Urban Structure – Integration and Connectivity

- 6.9 With regard to the urban structure of the area, the study considered:

- **Integration of the Estate into the wider area** – to consider the extent to which residents have access to public transport and all the other opportunities that living in a capital city offers, as a significant indicator of life chances; and
- **Connectivity to routes in and around the site** – which indicates the ease of pedestrian access and the convenience and the feeling of safety and familiarity moving around the immediate area. The ability to understand how a particular route links to other routes has been found to be a key factor in developing a “picture” and sense of place. Poorly connected routes make navigation more difficult.

- 6.10 Using Space Syntax theory, the study found that in terms of integration with the wider Borough, Eastfields is somewhat separated from its surroundings, which is reflected by its PTAL Rating of 2. Whilst accessibility has been improved by the opening of Mitcham Eastfields Station in 2008, the railway line, the school grounds to the north and the extensive cemetery to the south and east act as barriers to movement to and from the existing Estate in a number of directions. This leads to the likelihood of more trips to be taken by car.

- 6.11 At a local context level, the existing Estate has relatively low levels of integration, again caused in part by the Cemetery, which, whilst providing a positive open aspect for residents, does restrict access to better integrated routes in the local area.

- 6.12 Within the Estate itself, the existing building footprint creates a curious pattern of connections, displaying an inverse pattern of movement when considered to more traditional residential development layouts. Acacia Road and the eastern and western perimeter roads of the Estate are “warm” routes, however the “hottest” routes are within and across the open space at the centre of the Estate, then linking to “cooler”, and less connected routes out of the Estate.

- 6.13 Given the relatively isolated location and the relatively impermeable land uses around the site, opportunities to make small but potentially significant improvements to the integration of the Estate into the wider area via redevelopment are relatively limited under Option 3.
- 6.14 In summary, whilst there are a great number of routes in and around the Estate, the analysis indicates it is poorly connected to its local area, it is over-connected internally and the Estate is relatively isolated in terms of the wider Borough.

Layout

- 6.15 With regard to the layout of the existing Estate, the study considered building layout and building interfaces. This indicates whether the building layout and facades provide the required level of surveillance and activity to animate streets and communal areas, providing a safe feel to an area, as well as providing privacy and security of private amenity space.
- 6.16 Using figure ground diagrams, the existing layout of the Estate demonstrates a clear and visible street network in some areas, however the overall Estate presents itself as a castle or fortress due to its distinct perimeter building layout, which stands out from the character of the majority of other residential development in the area. The figure ground diagrams also reveal a very clear separation between public space of the street outside the Estate, and the more private internal space, despite the numerous routes through the centre of the Estate, which do act to blur this distinction in reality. Whilst there are gates on the accesses into the centre of the site, we understand that these are not locked and therefore access to the centre of the Estate is unrestricted.
- 6.17 Intervisibility analysis measures how visually connected one space is from another within an area and is a good indicator of how safe people feel when occupying a space. The current layout of Eastfields leads the central open space to display very varied levels of intervisibility ranging from low to medium ratings around the perimeter areas of the open space, to high within the central area. When considered against the connectivity analysis as described above, there is a problematic correlation between the areas of lower intervisibility and the most frequented routes, meaning that a large number of journeys through the area are made through areas where people are likely to feel unsafe; particularly the alleys into the area which are not well overlooked. These findings are consistent with some of the comments reported by residents during the Estates Plan DPD Issues and Options consultation which indicated a desire to see greater surveillance and security within communal areas. This indicates a structural problem with the existing arrangement of space within the Estate, which could not easily be rectified without changes to the layout of the buildings themselves.
- 6.18 With regard to building interfaces, the NPPF acknowledges the importance of creating safe, lively and sociable places and the outlook from buildings has an important role to play in this. At

present, the report indicates that almost all of the Estate, both internally and externally, has a “dead” frontage due to the predominance of garages and fencing at ground level. Whilst the majority of flats have their doors facing out on to the street, the majority of townhouses have deeply recessed doors, not visible from the majority of street areas.

Quality of the External Environment

- 6.19 The final theme within the report is the quality of the external environment, which takes account of a range of matters including streetscape, landscape and open space.
- 6.20 In consideration of the streetscape, the study identifies that from a vehicular point of view, the majority of the roads are either dead ends or connected routes to dead ends. There are high levels of parking around the perimeter of the Estate and cars dominate much of the streetscape. Acacia Road and Mullholland Close are not joined for vehicles which also prevents through movement.
- 6.21 From a pedestrian point of view, and as previously mentioned above, movement through the centre of the Estate requires passing through narrow alleyways which are gated although not locked and are not well overlooked. Although many areas are clearly defined by fencing, other parts of the Estate do not offer a clear definition between public and private space, which can be confusing and can prevent people from using spaces. Much of the fencing also helps to screen pedestrian routes from surveillance which can create perceptions of feeling unsafe.
- 6.22 With regard to landscape and open space, the study recognises that the large volume of open space within the centre of the site and the aspect across the cemetery to the south and east reduces the perception of Eastfields urban nature. Whilst the quantity of open space is generally good, visibility and overlooking varies across different parts of the Estate and there is often ambiguity between whether spaces are public or private. Formal social spaces on the Estate lack adequate facilities to support their intended use.
- 6.23 Whilst the existing layout does incorporate “pockets” of landscaping, levels of maintenance vary and many of these are in particularly poor condition. Within the internal space, the mature trees offer character to what is otherwise an open area.
- 6.24 With regard to play space, the existing Estate has a range of formal and informal space for play, however the dedicated multi use games facility is in extremely poor condition and is not well used. The nearby park on the corner of Clay Avenue, however, is close by and in good condition.

The Visual Impact of the Existing Estate

- 6.25 A Visual Impact Study (October 2016) was carried out by Peter Stewart Consultancy to build upon the urban design review undertaken by Sue McGlynn, and to introduce more information on visual considerations of the townscape around the estate. The analysis has been carried out from 7 viewpoints that were agreed with the LBM.
- 6.26 The study concludes that the townscape surrounding Eastfields Estate has a mixed character of varying quality. In terms of visual impact, it goes onto conclude that: “the main views that are affected by Eastfields Estate in its existing layout are those from locations immediately adjoining the estate and which show the ground level conditions, architecture and layout and which expose the respective urban design defects of the estate. The estate has no visual impact from viewpoints located further away from the estate. What is noticeable from most of the views and, indeed, from walking around the area, is that there is no sense of arrival at the Eastfields Station and little legibility in trying to navigate from the station, around the school and towards Eastfields Estate.” ... “The Estate is built in a fairly isolated site . The poor urban design layout and architectural expression of the estate creates a negative visual impression on the immediately adjoining streets.”

Conclusions

- 6.27 Using the Building for Life toolkit traffic light system the Urban Design Review study ranks the existing Estate as having only 3 green ratings and 3 amber ratings, indicating that half the criteria fall into the red rating or major concern.
- 6.28 Whilst Option 2 could allow the existing positives to be built on, for example the high levels of open space by improving landscaping and creating better definition between public and private spaces, the layout of buildings would remain the same and as such if would not address some of the more fundamental issues within the Estate.
- 6.29 Option 1 would have no material impact on the baseline positions identified above, and would not rectify any of the urban design issues discussed above.
- 6.30 Given that a number of the areas of major concern, such as integration of parking, navigation through the Estate and definition of streets, could only be rectified through a fundamental redesign of the Estate, the report concludes that redevelopment and regeneration (Option 3) has the potential to increase the quality of the Estate. Option 3 provides the opportunity to deliver an improved urban design, enhance legibility and the character of the area / townscape, which Options 1 and 2 would not do.

6.31 Aside of the points discussed above, the study also highlights the potential from an urban design point of view to increase density and building height across the site as well as architectural variation, making the most of the separation of the Estate from neighbouring residential development and a lack of context from which to draw.

Sustainability

6.32 Whilst the theme of sustainable development flows through the entire Case for Regeneration document and all elements being considered, it is also important to consider the scope for the inclusion of specific design features under each of the Options that would bring about increased sustainability. Such measures include the incorporation of Sustainable Drainage Systems (SUDS), green and brown roofs, ecological enhancements as well as more generally optimising the potential of brownfield land.

6.33 With Option 1 including only internal works, it offers no potential for including the specific sustainable items identified above. Similarly, Option 2 offers limited potential for such measures, however green or brown roofs could be installable on some properties subject to further structural investigation.

6.34 In comparison, Option 3, for the full redevelopment of the Estate, offers the opportunity to engrain all of the above, as well as other measures to ensure that the very design of Estate is truly sustainable, rather than retrofitting such features.

Energy

6.35 As part of the Energy Report undertaken by MLM in November 2014, as discussed above in connection to the existing energy performance of the dwellings, consideration was given to how the existing energy performance levels compare to the requirements of Building Regulations Part L1A and L1B 2013 for new build homes (equating to Option 3) and refurbished homes (equating to Option 1, with Option 2 potentially performing slightly better).

6.36 The existing condition of the stock is compared to the minimum requirements as set out in Building Regulations below:

Fabric	Current	Part L1A 2013	Part L1B 2013
External Walls	2.46 w/m ² .K	0.30 w/m ² .K	0.30 w/m ² .K
Roof	0.68 w/m ² .K	0.20 w/m ² .K	0.18 w/m ² .K
Windows	4.00 w/m ² .K	2.00 w/m ² .K	-

- 6.37 As seen above, there are significant departures between the energy performance levels within the existing properties, which are particularly poor for external walls, when compared to the levels that could be achieved within new build or even refurbished properties.
- 6.38 MLM conclude that whilst Options 1 and 2 would offer energy performance benefits, financial analysis demonstrates that the upgrades required under Options 1 and 2 would have significant payback periods and as such are less attractive. Whilst the initial outlay for Option 3 would be greater, the stock would be significantly better in terms of energy performance, when compared to any refurbishment Option, and would also have a longer lifespan. As such, Option 3 is considered to be the preferred Option.

Flood Risk

- 6.39 PBA have produced an Environmental Desk Study (February 2014) to consider a range of issues including flood risk and geotechnical and geoenvironmental considerations.
- 6.40 With regards to flood risk, the existing site is within Flood Zone 1, meaning the annual probability of fluvial and tidal flooding is less than 0.1%; furthermore the site has no recent historic record of flooding.
- 6.41 Given its position in Flood Zone 1, proposed redevelopment is not be likely to result in any flood water displacement and would be in line with the Sequential Approach set out in the NPPF.
- 6.42 There is known to be a culverted watercourse towards the eastern boundary of the Estate. Accordingly, redevelopment offers the opportunity to expose this to create a swale, which would assist in reducing runoff rates as well as reducing the potential for surface water flooding.
- 6.43 With regards to the impact of flood risk on the development potential of the site, Options 1 and 2 would not introduce any works that would materially affect flooding in and around the site. Option 3, however, offers the opportunity to increase the density of housing in a low flood risk area and also introduce a swale which would help to mitigate against surface water flooding as well as introduce a number of biodiversity benefits.

Geotechnical and Geoenvironmental

- 6.44 As referenced above in connection with flood risk, PBA's study also considers geotechnical and geoenvironmental issues following a desk study to consider 1) the potential risks and hazards associated with contamination in the ground and 2) the geological hazards and potential ground stability risks arising from cavities or other potential adverse foundation conditions.

- 6.45 Taking account of the historic land uses of the site, the study concludes that there is moderate likelihood for contamination within the Estate; however, basic and non-onerous mitigation measures, which are fairly standard for many urban brownfield sites could be incorporated to facilitate any development.
- 6.46 Having analysed the soil conditions, PBA conclude that a mixture of shallow spread foundations would be appropriate for lower storey buildings with pile foundations on any medium to high rise structures.
- 6.47 Given that Options 1 and 2 would not require any significant levels of ground works, geotechnical and geoenvironmental issues are considered to be of minor importance. Whilst the full regeneration of the Estate would require significant groundworks, the results of PBA's study do not indicate any factors that should prevent the potential for redevelopment or result in overly onerous cost implications to bring development forward. Accordingly, all three Options are considered to be acceptable.

Conclusions

- 6.48 With regards to environmental and placemaking factors, this report considers that the most significant issue is the urban design of the Estate alongside the energy performance of the existing stock.
- 6.49 On this basis, Option 3 presents the most "justified" strategy in terms of environmental and placemaking factors as it would:
- Enable a redesign of the layout of the existing Estate to improve the quality of urban design, including addressing the dead frontage and reducing areas that do not benefit from natural surveillance; and
 - Improve the energy performance of the dwellings within the Estate.
- 6.50 Of the remaining, Options 1 and 2 are considered to be broadly similar; however, Option 2 is likely to be the marginally preferable second choice given that the enhanced refurbishment could incorporate better energy performance and could also improve the quality of landscaping and separation of public and private space around the Estate.

7. Considering the Options: Economic Considerations

- 7.1 With all Options proposing substantial works, whether in the form of refurbishment or regeneration, there would clearly be a significant financial cost attached to whichever route is pursued. Whilst CHMP's priority is to create better homes for its current and future tenants, it is also important to ensure that the selected Option is financially deliverable, as per NPPF paragraphs 173 to 177.
- 7.2 CHMP and their consultants have derived the costs and values associated with each of the Options being considered in this report. This work has been fed into financial modelling, which gives consideration to the Options over a 50 year period. This financial modelling will be ongoing.
- 7.3 Due to commercial confidentiality, details associated with the financial modelling are not disclosed within this document, however, a summary and commentary on the outcomes of the ongoing financial modelling work is included below. It is important to note that the regeneration of the Eastfields, High Path and Ravensbury Estates is considered as a single project for economic purposes by CHMP and as such the financial deliverability of the regeneration of the three Estates is interlinked. High Path is the value driver and therefore the financial benefits of the regeneration of the High Path Estate are to be used to enable the regeneration of the Eastfields and Ravensbury Estates.
- 7.4 At the time of writing, the Cost Benefit Analysis undertaken by CHMP highlights that all three Options would result in a deficit over the 50 year business plan as shown below.

Option	Total benefit / (cost)
Option 1: Decent Homes	£ (40,000,092)
Option 2: Enhanced Refurbishment	£ (44,083,366)
Option 3: Regeneration	£ 9,813,654

- 7.5 The results of this ongoing work indicates that Option 3, for the regeneration of the Estates is the most sensible solution over the 50 year life cycle as it would deliver the greatest regeneration benefits having regard to CHMP's vision and planning policy requirements, including the housing, socio-economic, place making and environmental benefits identified within this report. Regeneration therefore presents the most sensible and sustainable solution. Furthermore, CHMP is an affordable housing provider who has funding in place to deliver better quality affordable housing compared to current standards, which is the key driver for the regeneration. Extensive work has been undertaken on the emerging regeneration proposals, to

incorporate homes for private occupation into the schemes to reduce the overall deficit and this will continue.

7.6 Options 1 and 2 would involve significant cost in the short term to bring the properties up to the appropriate standard. However, these costs would only ensure the properties remain at the necessary standards for a relatively short period of time. Given the condition of the properties (as explored above) a significant level of further investment would be required over the next 50 years to maintain the properties at a liveable standard. As a result, Option 3 is the most sensible solution delivering the greatest regeneration benefits.

7.7 In summary, the work that has and continues to be conducted by CHMP and their consultants indicates that regeneration (Option 3) of the Estates would be the most economic and deliverable Option having regard to ongoing financial modelling; therefore, this would be “justified” and “effective” and would therefore meet this soundness test of paragraph 182 of the NPPF.

8. Considering the Options: Public Consultation

Introduction

- 8.1 CHMP have been firmly committed to understanding the aspirations of the Estate residents and its neighbours and their thoughts on the Options for refurbishment and regeneration.
- 8.2 In order to do this CHMP's Regeneration Team alongside Levitt Bernstein Architects and the wider project team have undertaken a series of public events between June 2014 and the present.
- 8.3 A summary of the consultation process, is included below.

Public Events

1. Community Event - 14th June 2014

- 8.4 The first public event provided residents with the opportunity to provide feedback on what they liked and disliked about the Estate, as well as making suggestions on the possibilities for refurbishment and regeneration.

2. Workshop on Types of Homes – 26th June 2014

- 8.5 This workshop, which was attended by 52 people, gave residents the opportunity to provide feedback on the types of homes that they would like to see on the estate if it were to be regenerated. Some of the key comments raised indicated preferences for:

- At least the same size or larger properties;
- A more traditional design, potentially constructed from brick; and
- More private amenity space.

3. and 4. Community Event and Workshop – Open Spaces, Streets and Homes – 12th July 2014 and 23rd July 2014

- 8.6 The purpose of these events were again to gain feedback from residents focussed around three key themes: open space, streets and homes.
- 8.7 Some of the key comments drawing out of this event indicated:

- Support for the central green space and landscaping;
- Concerns around safety of public spaces and play areas; and
- A dislike for wood and metal panelling as a cladding material.

5. and 6. Workshops on House Layouts – 2nd August 2014 and 9th September 2014

8.8 The purpose of these events were to gain an understanding of what the current residents wanted to see from the internal layouts of new properties and to provide comments on some initial layout options.

8.9 Clearly, the diverse range of housing needs as well as individual preference meant that there was unlikely to be consensus on such an issue, however some of the key points that were raised are included below:

- Many residents supported a variety of house types to provide choice within the Estate;
- A number of residents also expressed interest in the flexibility of “multi-generational homes” to have separate annex for children or elderly relatives within the home;
- Mixed views towards open plan living;
- Strong support for more storage;
- Support for private amenity space to be separated and away from public spaces; and
- Support for adequate parking levels and appropriate controls to make sure non-residents do not use it.

7. Draft Masterplan Launch – 18th, 20th, 21st and 22nd October 2014

8.10 Building from all the feedback received at the previous events, this series of four workshops tabled CHMP’s emerging masterplan vision for the full regeneration (Option 3) of the Estate.

8.11 A total of 123 people attended the events with 30 feedback forms completed in detail. Some of the key points drawing out of the feedback were:

- 60% of respondents “like” or “like very much” the draft layout, with only 20% indicating that they neither “like” nor “dislike” the draft layout.
- 69% “like” or “like very much” the new home designs for the neighbourhood.
- 61% “like” or “like very much” the sizes of the homes proposed.
- 77% “like” or “like very much” the energy efficient homes.
- 61% “like” or “like very much” the draft plans for open space and landscaping.
- 55% “like” or “like very much” the draft plans for neighbourhood and community facilities.
- 57% “like” or “like very much” the draft plans for parking.

Other Workshops

- 8.12 Further sessions were held to provide an opportunity for the communities to be involved in the scheme development, including a workshop to discuss options for landscaping and parking (5th March 2015), with a subsequent workshop to discuss options for house types and layouts (26th March 2015).

Other Consultation

- 8.13 Moving proposals forward, CHMP issued their Residents Offer in late May 2015 and further public consultation was undertaken as part of this process to give residents the opportunity to engage with CHMP to discuss the contents of the Offer. These sessions were held on the 4th, 6th and 9th June 2015. This is a crucial stage of the overall proposals for the Estate.
- 8.14 In moving forward, CHMP are committed to continuing this process of community engagement.

Newsletters

- 8.15 To ensure that the existing residents are kept up to date and informed with the progress of the regeneration proposals, CHMP send out quarterly newsletters to all existing residents.

Conclusions

- 8.16 As the design process is still evolving and much of the feedback has focused on wider issues, it is difficult to correlate the feedback from these public events to support or opposition to a specific option, however clearly there would be a mix of support between Options 1 and 2 as well as 3.
- 8.17 General feedback from the events indicated that people liked living on the Estate and in the local area, however many attendees of the events recognised that change was required.
- 8.18 Possibly the most informative feedback came as a result of event 7 where the draft masterplan was presented to residents. From the statistics, it is apparent that a majority of existing residents that attended and responded do like the proposals for the redevelopment and regeneration of the Estate which may indicate a preference towards Option 3, however as this cannot clearly be confirmed, we have ranked all Options equally as a result of the public consultation process.

9. Conclusions

- 9.1 The purpose of this document has been to consider the technical work undertaken to demonstrate the economic, social, environmental arguments for and against three Options for the refurbishment or regeneration of the Eastfields Estate, Mitcham on behalf of CHMP to ascertain whether there is a “Case for Regeneration”. This document forms part of the evidence base for the independent examination of the DPD to assist the Inspector in considering the Plan against the requirements of the Planning and Compulsory Purchase Act 2004, and the tests of soundness identified in the NPPF, namely whether the emerging Plan would be “positively prepared”, “justified”, “effective” and “consistent with national policy”.
- 9.2 The Options considered within this document were:
- Option 1 – Refurbishment to Decent Homes (Merton Standard);
 - Option 2 – Refurbishment to an Enhanced Standard; and
 - Option 3 – Full redevelopment.
- 9.3 In addition to the provisions within the HSTA, the existing condition of the stock highlights some key issues, including dwelling condition and energy performance, which mean that doing nothing is no longer an Option; it would not be “justified”.
- 9.4 The Options must be considered against the backdrop of adopted and emerging planning policy, in which there is clear support for boosting the supply of both good quality market and affordable housing to meet current and future housing needs of different groups in the community. At a Borough level, LBM are faced with increasing housing targets. Whilst Options 1 and 2 offer the opportunity to improve the quality of the existing stock, such works will have limited longevity; accordingly, Option 3, which would significantly improve the quality of stock via regeneration for a longer time period, whilst also boosting the overall volume of units, is considered to be preferential. Regeneration would therefore be “justified” and “consistent with national policy”. Further, in helping to meet objectively assessed development requirements, a Local Plan which supports this approach would be “positively prepared”.
- 9.5 In consideration of socio-economic factors, the existing housing stock does not efficiently meet the housing needs of the current residents. Only Option 3 gives CHMP the opportunity to rebalance the mix of stock within the Estate to better meet current affordable housing needs. Full regeneration is also considered to be the preferential option in terms of delivering wider socio-economic benefits including increased local spending and funding raised through S106, CIL and the New Homes Bonus, as well as the potential for a new commercial / community facility within the Estate. Regeneration would therefore be “justified” and “consistent with national policy”.

- 9.6 With regard to environmental and place making factors, the primary issues identified were associated to urban design and energy performance. With regards to urban design, issues including dead frontage and removing unoverlooked areas cannot be achieved through Options 1 and 2, and could only be addressed through more comprehensive regeneration, through Option 3. Whilst good improvements could be achieved under Options 1 and 2 with regard to energy performance, these would be minimal in comparison to the levels that would be achieved through the construction of new properties built in accordance to modern building standards under Option 3 and furthermore, they would not be as cost effective in the longer term. Regeneration would therefore be “justified” and “consistent with national policy”.
- 9.7 Economic and financial modelling has been, and will continue to be, undertaken by CHMP, and their consultants to consider the Options within this report. The work produced to date indicates that Option 3 (regeneration) is the most rational and sustainable Option which will deliver the greatest regeneration benefits. It is therefore the most “effective” Option for delivering regeneration in a cost effective way.
- 9.8 Aside of the technical work undertaken, CHMP have also embarked on an extensive programme of public consultation to understand the aspirations of the existing residents of the Estate. No clear preference for any Option has emerged as a result of this work, however feedback from the residents that attended the last workshop suggested a marginal preference towards Option 3.
- 9.9 For the reasons set out above, it is considered that this document clearly demonstrates that Option 3 for the full regeneration of the Eastfields Estate, is the most preferable Option when considered against reasonable alternatives, and therefore that there is a Case for Regeneration.
- 9.10 It would therefore be a sound approach for the emerging Estates Plan DPD to support the full regeneration of the Eastfields Estate, as it would be based upon a “positively prepared” strategy and it would be “justified”, “effective” and “consistent with national policy” (in particular NPPF paragraphs 9, 14, 15, 47, 50, 56 to 58 and 69 to 78, 159 and 182, amongst others).