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Ravensbury Estate, Merton

Case for Regeneration

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1. Introduction

Background to Ravensbury Estate

- 1.1 The Ravensbury Estate is located towards the south of the London Borough of Merton (LBM), within the Ravensbury ward, to the south east of Morden town centre. It sits alongside the River Wandle, between Morden Hall Park and Ravensbury Park with Morden Road wrapping around its western and northern perimeters.
- 1.2 Originally constructed between the late 1940s and mid 1950s as part of the post-World War II housing boom, 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 192 dwellings, including houses and flats across a mix of tenures including private ownership (as a result of right to buy) and social rent, including a mixture of semi-detached and terraced houses, flats and maisonettes. Surrounding the residential properties are areas of amenity grassland, informal planting beds, scattered semi-mature trees and hard standing consisting of pavements, roads and car parking.
- 1.4 Additionally, located at the southern corner of the site there are a number of garages that are in disrepair and are not in use, these are currently under the ownership of LBM.
- 1.5 There is a small community facility of approximately 140 sqm.
- 1.6 The Estate area totals approximately 4.42 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 Ravensbury 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 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 some of the 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 Ravensbury, Eastfields and High Path as the three Estates within CHMP's ownership with the most viable regeneration potential.

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 Ravensbury Estate. This in turn, would significantly enhance the lives of the residents on the Estate, helping to overcome inequalities faced by those living

¹ As defined within the HSTA.

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 High Path Estate in South Wimbledon and Eastfields Estate in Mitcham.

The Purpose of this Document

- 1.14 Having identified an opportunity to explore the potential for more comprehensive improvements to the Ravensbury Estate, as well as the Eastfields 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 Ravensbury 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 Ravensbury 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 Firstly, 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 Secondly, and a more fundamental reason for change at the Ravensbury Estate is the structural components of some of the properties within the Estate. The existing dwellings can be split into two construction types:
1. Traditionally constructed masonry buildings (predominantly the flatted stock on the east side of the Estate, along Ravensbury Grove and Hengelo Gardens); and
 2. Non-traditional prefabricated reinforced concrete Orlit houses (predominantly to the centre, west and north of the Estate).
- 2.4 Aside from a general decline in the structural and environmental performance of the homes, the main driver for change on the Estate is that, under the Housing Defects Act 1984, all Orlit houses are classed as defective meaning that UK mortgage lenders will not offer security against them. Change is required as the Orlit houses are no longer fit for meeting housing needs in the medium to long term.
- 2.5 These issues have helped to shape the Options considered within this document and are analysed in greater depth below.

Housing Need within Merton

- 2.6 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.

- 2.7 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.
- 2.8 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.
- 2.9 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 that housing targets within the Borough and London will rise again within the next 5 years.
- 2.10 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.
- 2.11 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

- 2.12 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 and key stakeholders, 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 Ravensbury Estate.

2.13 Between June 2014 and July 2015, a programme of public consultation events have been held with CHMP's Regeneration Team alongside architects HTA Design. These have included drop in public exhibitions, residents' walkabouts, design charrettes, older people's focus groups and residents' site visits. Feedback from these events has helped to shape the design Options considered within this Case for Regeneration document.

2.14 As emerging regeneration proposals develop, CHMP are fully committed to continuing to consult closely with residents and other stakeholders.

2.15 Further information on the public consultation process and the feedback gained is included at Section 8 of this document.

Existing Condition of Stock

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

Structural Condition

2.17 Initial Structural Assessment Reports were produced by Tully De'Ath in October and November 2014 to consider the Orlit houses, Ravensbury Court, and Ravensbury Grove. The process of inspection included internal and external assessment. The reports conclude that:

- Orlit houses
 - Built in the 1950s, Orlit houses are a form of prefabricated reinforced concrete (PRC) construction that were built after the Second World War as a quick and economically feasible way to combat housing shortages, however they were never designed as a long term solution. By the 1980's Orlit homes were showing noticeable signs of deterioration and were becoming a concern, which led to them being officially declared defective under the Housing Defects Act 1984 (now part of the Housing Act 1985). Given their status within Legislation, the majority of UK mortgage providers will not lend against them and a number of insurance providers avoid issuing policies against such properties. Similarly, CHMP face difficulties in obtaining securitisation on such properties.
 - Within the Orlit houses on the Ravensbury Estate, there are no obvious signs of significant deterioration to the concrete frames however there are various levels of carbonation within the concrete which indicates variable levels of quality within the original construction. Whilst chloride levels are generally low, there are a few exceptions. Higher depths of carbonation and higher levels of

chlorides are not of significant concern so long as water ingress is prevented; however, if it is allowed to occur embedded reinforcement is vulnerable to corrosion which could lead to significant cracking and spalling of the concrete frame.

- Externally, the quality of the building envelope is generally reasonable on most properties however a number of areas are identified where measures may not be as effective as possible at preventing water ingress, which would exacerbate future corrosion of the concrete frame. Continuing to take a reactive approach to repairs to these properties as issues arise would involve significantly higher costs to CHMP than considering a comprehensive regeneration of the Estate over a period of 50 years.
- Ravensbury Court
 - Ravensbury Court is a three and four storey residential block of flats with masonry external walls and tiled pitched roofs.
 - Whilst cracking was observed at a number of locations in the elevations, running through both bricks and mortar, the load bearing masonry structure of the building appears to be in average condition for its age and type. Further cracking was seen in the concrete forming the stairwells and canopies over the stair cores / stair wells which requires more immediate attention.
- Ravensbury Grove (171-177 Morden Road, 2-18 Ravensbury Grove, 20-26 Ravensbury Grove, 36-50 Ravensbury Grove and 64-70 Ravensbury Grove)
 - These buildings are all two storey brick faced buildings with tiled pitched roofs with load bearing masonry and a timber roof.
 - Whilst some cracking has been found, the buildings appear to be in an average condition for their age and type. This could primarily be caused by water ingress, particularly on the outer edge of the terrace structure where it is vulnerable to higher concentrations of surface water after rainfall.

Dwelling Condition Survey

2.18 An Existing Dwelling Condition Survey has been undertaken by HTA in February 2015 to conduct a visual assessment and consider the condition of the existing properties and their compliance with DCLG Decent Homes guidance for social housing as well as adopted GLA space standards, reviewing eight representative properties within the Estate.

2.19 On the basis of the guidance within A Decent Home: Definition and Guidance for Implementation (June 2006), a home meets the standard if the following four criteria are met:

1. It meets the current statutory minimum standard for housing. Dwellings which fail to meet this are those which contain 'Category 1 hazards';
2. It is in a reasonable state of repair;
3. It has reasonably modern facilities and services; and
4. It provides a reasonable degree of thermal comfort.

2.20 HTA used this to create a checklist for assessing the properties including hazards, components and thermal comfort.

2.21 A range of Orlit houses were assessed, all of which had visible defects against the Decent Homes criteria, including signs of damp and mould, lack of insulation, very old kitchens / bathrooms and overcrowding.

2.22 With regards to internal space standards, the Orlit houses measure 84.4 sqm. This is 8.6 sqm smaller than the minimum space standards for new development within the Greater London Authority's (GLA) consultation draft of the Minor Alterations to the London Plan (Housing Standards) (May 2015)², which requires 93 sqm minimum internal area requirement for a new 3 bedroom 5 person 2 storey residential dwelling.

2.23 A similar assessment was also carried out on flatted properties on Morden Road and Ravensbury Grove. Again, all surveyed properties had visible defects against the Decent Homes criteria. Similarly, the properties fell below the GLA's 50 sqm draft minimum standard for 1 bedroom 2 person flat by between 3.9 sqm and 5.8 sqm. Of the two flats surveyed, 1 was marginally above the GLA's 5 sqm minimum private amenity space standards by 0.3 sqm and 1 was below by 1.5 sqm, however both fell short of the recommended depth to provide a useable quality of space.

2.24 Within Ravensbury Court, the surveyed property also had visible defects against the Decent Homes criteria, including damp and mould, exposed and dated pipe work and plumbing, however, these were not as significant as a number of the other properties. The 2 bedroom 4 person 2 storey maisonette that was surveyed fell 14 sqm short of the GLA's draft minimum internal space standard of 79 sqm. Furthermore the unit, as with the vast majority of units within Ravensbury Court, does not have access to any private amenity space; however there is access to an unsecured communal area shared by 59 dwellings.

2.25 In order to achieve a 10% internal inspection rate across all unit types, Baily Garner LLP undertook further internal surveys in September 2015 for a number of units at Hatfield and Ravensbury Court. These surveys identified that 16% of kitchens and 33% of bathrooms were deemed old and in poor condition. 66% of boilers were also deemed old and at the end of their

²Which has been updated to reflect the Technical Housing Standards – Nationally Described Space Standard, as published by the Department for Communities and Local Government in March 2015.

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

2.26 A study was undertaken by HTA in November 2014 to consider the existing energy performance of the dwellings, collecting information on the fabric, heating and hot water services, by examining a representative sample including an Orlit semi-detached house (19 Hatfield Close), a brick constructed flat (177 Morden Road) and a brick constructed maisonette (43 Ravensbury Court). Using RdSAP modelling³, based on the data collected during the site visit, to calculate the energy rating on a scale of A to G (with A being the highest efficiency and G being the lowest):

- Orlit houses have an energy rating of E52;
- Brick flats have an energy rating of D65; and
- Brick maisonettes have an energy rating of D67.

2.27 Generally, this indicates a middle to low energy performance rating on the majority of the stock.

Asbestos

2.28 A Refurbishment and Demolition Asbestos Survey was carried out by Pennington Choices Ltd in September 2014 by examining a sample of properties within the Estate. This Survey identified that there is asbestos (chrysotile and / or amosite) within the external soffit panels within the roof eaves of all of the surveyed properties, however no records of asbestos were found internally.

³ A tool derived from the Government's national calculation methodology for the energy efficiency of existing dwellings.

3. The Options

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 Ravensbury 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 and the addition of balconies to provide private amenity space on the flatted properties.

- **Option 3 – Partial Redevelopment**
 - Refurbish existing properties owned and managed by CHMP within Ravensbury Court and Hengelo Gardens to an enhanced standard, as described above, and redevelop the remainder of the Estate to deliver higher density, new modern, energy efficient and high quality homes, alongside a new community space, open space, landscaping and car parking.

Other Discounted Options

“Do Nothing”

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 Ravensbury

Estate as a minimum. This means that to 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.

Full Regeneration

- 3.4 CHMP has given consideration to the potential for a full regeneration; however, this is not considered to be a reasonable alternative and therefore it has not been taken forward for the reasons explained below.
- 2.29 The existence of defective Orlit housing means that the Ravensbury Estate is an exceptional case. Under the Housing Defects Act 1984, all Orlit houses are classed as defective. Built in the 1950s, Orlit houses are a form of prefabricated reinforced concrete (PRC) construction that were built after the Second World War as a quick and economically feasible way to combat housing shortages, however, they were never designed as a long term solution. By the 1980's Orlit homes were showing noticeable signs of deterioration and were becoming a concern, which led to them being officially declared defective under the Housing Defects Act 1984 (now part of the Housing Act 1985). Given their status within Legislation, the majority of UK mortgage providers will not lend against them and a number of insurance providers avoid issuing policies against such properties. Similarly, CHMP face difficulties in obtaining securitisation on such properties.
- 3.5 As a result of the initial work conducted by CHMP to identify which estates within their Merton portfolio (as discussed in Sections 1 and 2 above) were most in need of work over and above Decent Homes standards, Ravensbury was of upmost priority on the basis of the high proportion of defective Orlit housing within the Estate. There are 72 Orlit houses on the Estate and these are all located on the western portion of the Estate (to the west of Ravensbury Grove). The homes located on the eastern portion (to the east of Ravensbury Grove) which contains Ravensbury Court and Henglo Gardens are not of Orlit construction and they form their own block with good separation distances between it and the other properties on the Estate. As such, the demolition and redevelopment of the wider Estate can take place with Ravensbury Court and Henglo Gardens unaffected from a structural and physical point of view.
- 3.6 Furthermore, the western portion of the Estate comprises of predominantly tenanted properties in CHMP ownership. At the time of analysis there were only 11 leaseholders or freeholders. This significantly reduces the number of third party interests that need to be acquired, helping to reduce associated site assembly costs. On the other hand, in Ravensbury Court, 29 of the 59 homes are leaseholder, and of the other properties on Hengelo Gardens, 19 of the 22 homes are freehold. Proceeding with a full regeneration would therefore require the acquisition of a comparatively high number of third party interests which would lead to high site assembly costs and additional disruption to residents. This in turn would threaten the viability and

deliverability of the regeneration overall. Given the impact on deliverability, it would not be justified or effective to proceed with a full regeneration.

3.7 HTA Architects were also asked to explore the potential for full regeneration; however, given the constrained nature of the site and the specific housing needs requirements associated with re-providing homes to the leaseholders and freeholders that would be subject to acquisition, there are limitations on the quantum of residential accommodation that can be appropriately provided on the site. The results of this exercise indicated that a full regeneration would not be able to generate a significant further uplift in residential floorspace. The inability to deliver a significant increase in the number of homes means the site assembly costs associated with acquiring properties in Ravensbury Court and Hengelo Gardens become comparatively expensive. This, combined with the significantly higher costs of undertaking a full redevelopment, would mean that a full regeneration would not be viable. It would therefore not be justified or effective, as it would not be deliverable.

3.8 For the reasons set out above it is considered that full regeneration would not be “justified” or “effective” in comparison to Option 3 (partial regeneration) and would therefore not meet the soundness tests of paragraph 182 of the NPPF. It has therefore not been considered further in this document.

Criteria Considered

3.9 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.

3.10 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 Ravensbury 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 (partial 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 Ravensbury 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 differences 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 that Londoners can afford. 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 Ravensbury Estate, as well as High Path and Eastfields, 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 Ravensbury Estate, although not specifically designated within the Sites and Policies Plan for any particular land use, does fall within the Morden Sub-Area of the Core Strategy where it is generally identified as a residential area. Core Strategy Policy CS3, although relating principally to Morden Town Centre, does note that the area surrounding the Town Centre should be conserved and enhanced as a suburban neighbourhood.

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 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 Ravensbury 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 Ravensbury Estate 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 Ravensbury Estate (alongside High Path and Eastfields) 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. 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.
- 4.29 More details on this process and the responses received by LBM are available on the Authority’s website, on the Estates Plan page⁴.

⁴<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 Ravensbury Estate is 85.1% affordable housing and comprises the following overall size mix:
- 28.7% - 1 bedroom;
 - 1.0% - 2 bedroom; and
 - 70.3% - 3 bedroom.
- 5.5 With the report indicating that the mean gross annual household income in Ravensbury is £22,811, which is 46.8% 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 170.8% across properties of 1 to 4 bedrooms within the Ravensbury area.

Existing Affordable Housing Need within the Estate

- 5.6 Turning specifically to affordable housing need within the Ravensbury Estate, Table 4.1 of the Housing Needs Study indicates that there is a current total of 86 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 affordable housing units.

Newly Arising Affordable Housing Need

- 5.7 HDH estimate that, using authority-wide household formation rates, 2 new households will form per year from the existing population of the Ravensbury Estate, which represents a household formation rate of 2.0%. Assuming that these households will be of a similar composition as the profile for new households recorded in the English Housing Survey, 100% of these households would be unable to afford market housing in the Ravensbury 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.
- 5.8 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 Ravensbury area, this indicates a newly arising need of 7 households per year within the study area.

Availability of Affordable Housing

- 5.9 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.
- 5.10 Turnover is relatively low within the social rented units within Ravensbury Estate, with on average just 6 lettings becoming available each year, based on trends from 2011 to 2014.
- 5.11 With regard to intermediate housing, no stock is currently available at the Ravensbury Estate.

Conclusions

- 5.12 From the assessment work undertaken by HDH it is evident that the housing needs of the existing residents of the Ravensbury Estate are very different to the volume of units and mix of properties that are currently within the Estate. This leads HDH to conclude that part

refurbishment / part redevelopment (equating to Option 3) would be a solution as it would 1) provide better housing for the current population but 2) also allow the site to help deliver more housing to meet future needs for housing. Taking this longer term view and looking to address future growth in housing needs would help to reduce pressure on equivalent housing stock in other parts of the Borough.

- 5.13 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, new affordable homes, in addition to the replacement of existing housing to be demolished, should be built on Ravensbury Estate including help-to-buy, shared ownership, affordable rent and social rent.
- 5.14 From this assessment it is clear that Option 3 (partial refurbishment / partial 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 1950s. 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.
- 5.15 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

- 5.16 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

- 5.17 The following baseline figures are identified within the Report:
- Only 68% of adults of working age in the Estate are economically active, compared to the Ravensbury ward as a whole at 74%.
 - Net weekly household income (after housing expenses) is around £410 compared to a national average of about £423.
 - According to the Census (2011), 23% of the working age population within the Super Output Area hold no qualifications, which is significantly above the LBM average of 6%.

- At Super Output Area level, Ravensbury 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.

- 5.18 The Analysis Report also notes that the site is relatively well served by social infrastructure including schools, retail and leisure and community facilities.
- 5.19 The Report concludes that regeneration (i.e. Option 3) is likely to have a positive effect on socio-economic inequalities identified above. Partial redevelopment allows an increased volume of purpose built housing stock to be delivered 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 population, 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 Option 3 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).
- 5.20 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, they do not offer the same levels of benefits.
- 5.21 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

- 5.22 PBA's Socio-Economic Analysis Report also gives consideration to wider economic benefits for the local area as a result of the Options.
- 5.23 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.
- 5.24 Option 3 also offers this benefit, but due to a programme of both refurbishment and construction, 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.

- 5.25 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.
- 5.26 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.
- 5.27 For these reasons, Option 3 is considered to be preferable to both Options 1 and 2.

Disruption to Residents

- 5.28 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

- 5.29 Taking into account wider socio-economic factors, including housing need, socio-economic indicators including crime, poverty and 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 objectively 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.

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 only non-residential land use within the Estate is a small community centre of circa 140 sqm on Ravensbury Grove.
- 6.3 Given the requirement to focus funding within Options 1 and 2 towards priority areas of the Estate, i.e. residential properties, it is unlikely that any significant works would be undertaken to the existing building under either of these Options.
- 6.4 Given the proximity of local shops and other facilities and services, Option 3 does not propose to introduce any new non-residential land uses to the Estate; however, it would provide the opportunity for the demolition of the existing community centre and the provision of a new, similar sized, but better equipped facility built to current Building Regulations. As discussed in the previous section in consideration of socio-economic factors, the creation of new residential 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 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).
- 6.5 On this basis, although any of the three Options would continue to provide a community centre of some sort, as an important part of social infrastructure, Option 3 is considered to be preferable for both the residents of the Estate and for the wider local population.

Urban Design

- 6.6 Sue McGlynn Urban Design Ltd (SMUD) were commissioned by CHMP to produce an Urban Design Review Study (March 2015) to consider the quality of the built environment within Ravensbury against established principles of urban design, excluding valued judgements on aesthetic or architectural styles.

6.7 Given that the works proposed under Option 1 would not involve any external works to the existing properties, it is not considered to have any material effect on the urban structure, layout or quality of the external environment. Accordingly, Option 1 is not considered in detail within this section.

6.8 For similar reasons, Option 2 is not considered in relation to urban structure or quality of the external environment below; however, as it would involve the installation of balconies, which would have an impact on the surveillance and privacy of the Estate, it is considered in relation to layout only.

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, Ravensbury is in a relatively isolated location within the Borough, which is reflected by its PTAL Rating of 2. Within and around the existing Estate, the River Wandle, parks and the railway line to the north act as barriers to movement, leading to the feeling that the Estate is a segregated enclave. Whilst this creates a quiet residential environment for much of the Estate, it also restricts movement and makes the private car the likely transport mode of choice even for short journeys. The current cul-de-sac layout reinforces the perception of separation from the wider area.

6.11 Given the relatively isolated location and the impermeable physical barriers 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.

6.12 Turning to connectivity, Morden Road is considered to be quantitatively “hot” indicating many vehicular, pedestrian and cycle connections converging on in close proximity to the Estate; however, qualitatively many of these routes may not be easy or pleasant to use in all weathers of times of the day. The study highlights in particular the potential of regeneration (Option 3) to

create better connections to nearby focal points such as the parks and children's play space, whilst avoiding over-permeability, which could undermine the secluded feel and disperse movement and activity without any real gain in wider connectivity.

Layout

- 6.13 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.
- 6.14 Using figure ground diagrams, the existing layout of the Estate defines a clear street network and clear distinction of communal spaces, comparable to nearby residential development to the south.
- 6.15 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, categorising the existing properties on the Estate as either active, passive or dead frontages, the majority of roads in and around the Estate benefit from active or at least passive frontages. However a number of areas within the Estate create dead points, where there is very little surveillance. This offers an area where the regeneration of the Estate (Option 3) could improve on the existing.
- 6.16 Whilst the current layout arrangement helps to create private amenity space, provided away from public view for the houses, the maisonettes have no external amenity space and the two storey flats have access only to a small terrace or balcony, looking onto the street. The addition of more balconies as private amenity space under Option 2 would provide the opportunity to further enhance the natural surveillance of the Estate.

Quality of the External Environment

- 6.17 Turning to the streetscape within the Estate, the study identifies that the straight street layout provides efficient accommodation of parking on the parts of the Estate however there is also a significant problem with parking on pavements. Partial regeneration of the Estate (Option 3) would allow a design to be developed that provides for the appropriate levels of car parking to help reduce these issues, taking care to ensure that it does not dominate the streetscape.
- 6.18 From a pedestrian point of view, the streetscape is predominantly the pavements along roads, as there are few pedestrian only routes. However, all existing pedestrian only routes identified within the Estate are highlighted as areas that could be improved via partial regeneration (Option 3).

- 6.19 With regard to landscape, the study acknowledges that the Estate at the moment has an open and green character, with good access to wider areas of parkland and the green corridor provided by the River Wandle, the majority of which are well maintained and contribute to an attractive residential setting.
- 6.20 Public consultation has highlighted the value to residents of the existing open space, gardens and mature trees. Whilst there is a lack of play space within the Estate, it appears that the majority of residents feel this is not an issue due to the size of private gardens and the communal open spaces, as well as the close proximity to play equipment in Ravensbury Park.
- 6.21 Given this position, there are no clear benefits in terms of landscape and open space point of view for the partial regeneration Option 3.

The Visual Impact of the Existing Estate

- 6.22 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 having regard to 8 viewpoints, including viewpoints from local conservation areas. The viewpoint locations were agreed with the LBM.
- 6.23 The study concludes that the townscape character surrounding the Ravensbury Estate is mixed. The Ravensbury and Morden Hall Parks create a beautiful environment, with a character created by an abundance of green landscaping; the Morden Road is a busy arterial road in the area, and the only way to access the estate with a car; and the industrial site to the east offers little to the area in terms of urban design and townscape. It concludes that “the visual impact of the Ravensbury Estate in its existing form is neutral. The scale and architecture of the existing buildings work well in their existing context, though the density of the built form is rather low on the estate.” Some of the viewpoints also show the limited permeability through the estate.

Conclusions

- 6.24 Using the Building for Life toolkit traffic light system, the Urban Design Review study, ranks the existing Estate as having 8 green ratings and 4 amber ratings, indicating no major aspects of concern.
- 6.25 Notwithstanding that, the study highlights a number of areas where partial regeneration of the Estate (Option 3) could improve the urban design of the area; most notably in connection with

removing “dead” areas within the Estate, improving the layout and design of car parking and improving pedestrian only routes.

- 6.26 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, making the most of the river frontage and also the potential to create a stronger built edge fronting Morden Road, east of The Surrey Arms.
- 6.27 Option 2 would allow the existing positives to be built on by creating further natural surveillance from the addition of new private balconies, however would leave the rest of the Estate unchanged.
- 6.28 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.
- 6.29 Option 3 provides the opportunity to enhance permeability and to improve the character of the area / townscape, whereas Option 1 and 2 would not.

Sustainability

- 6.30 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.
- 6.31 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.
- 6.32 In comparison, Option 3, for the partial regeneration of the Estate, offers the opportunity to engrain all of the above, as well as other measures to ensure that the very design of the Estate is truly sustainable, rather than retrofitting such features into the majority of properties.

Energy

- 6.33 As part of the study which was undertaken by HTA in November 2014, as discussed above in connection to the existing energy performance of the dwellings, consideration was given to what improvements could be made to the buildings with the application of different energy

efficiency measures. With energy efficiency highlighted within the public consultation exercise as a key problem within the existing stock, this is considered to be an important issue for the current residents of the Estate.

6.34 To recap, the baseline position of the existing dwellings on the Estate is as follows:

- Orlit houses have an energy rating of E52;
- Brick flats have an energy rating of D65; and
- Brick maisonettes have an energy rating of D67.

6.35 For the Orlit houses, the study confirms that the maximum uplift that could be achieved through Options 1 and 2 is from E52 to C75, representing an improvement of 23% from the existing energy performance. This would involve the installation of either external or internal insulation as part of an energy retrofit, plus the upgrade of the heating and hot water system and the installation of floor insulation, which is considered to be a process of significant disturbance to residents. If floor insulation was to be avoided, the maximum rating would be C74 (a 22% improvement from the existing).

6.36 For the brick flats, the study confirms that the maximum uplift that could be achieved through Options 1 and 2 is from D65 to C76, representing an improvement of 11% from the existing energy performance. This would again involve the installation of either external or internal wall insulation, plus potential improvements to the existing floor insulation. It is however noted that further floor insulation installation in such properties could necessitate more changes to the buildings including alteration of internal heights if the air vents need to be adjusted. If floor insulation was to be avoided, the maximum rating would be C72 (a 7% improvement from the existing).

6.37 For the brick maisonettes within Ravensbury Court, the study confirms that the maximum uplift that could be achieved through Options 1 and 2 is from D67 to C79, representing an improvement of 12% from the existing energy performance. This would involve either internal or external wall insulation, loft insulation and draft proofing openings, however would not require more intrusive works to individual properties.

6.38 Whilst the study concludes that the above assessment provides good arguments why the existing properties, particularly those of more durable construction, could be improved under Options 1 or 2, it states that these measures would still leave the stock with significantly lower energy performance ratings when compared to a similar dwelling built to meet and / or exceed current Building Regulations, which would be likely to achieve in excess of B81, if not significantly more, which equates to Option 3.

6.39 On the basis of the above in terms of energy performance alone, Options 1 and 2 do have potential to enhance the quality of the existing dwellings through a fabric first approach, particularly in Ravensbury Court. However, when considered as a whole, Option 3 would offer the most significant improvements in terms of energy performance and would also have a longer lifespan and would have the potential to incorporate renewables (such as photovoltaic panels) as part of the comprehensive redevelopment. Further design and financial feasibility testing will be required to consider the most appropriate renewables and energy strategy based on the Building Regulations at the time of application.

Flood Risk

6.40 PBA have produced an Environmental Desk Study (February 2014) to consider a range of issues including flood risk and geotechnical and geoenvironmental considerations.

6.41 With regards to flood risk, the existing site slopes from the east to west (towards the River Wandle) with ground levels varying from 17.4m to 16.8m AOD, indicating that it is relatively flat. Their work indicates that most of the property thresholds are stepped approximately 300mm above ground level.

6.42 With the River Wandle and the tributary channel along the site boundary designated as Environment Agency (EA) Main Rivers, the predominant flood risk to the site is from fluvial flooding from the River Wandle, which places the site primarily within Flood Zone 2 however minor areas are within Flood Zones 3a and b. The EA have indicated that the majority of the site is located within the functional floodplain of the River Wandle.

6.43 Whilst acknowledging the above, there is no recorded history of the site or any residential properties within the Estate having been flooded. The site is already developed for residential use and any residential redevelopment offers the potential to incorporate mitigation measures which would help to improve flood risk management on site. These could include maintaining existing flood storage and conveyance routes, setting residential accommodation at 300mm above the relevant 1% annual probability flood event (including climate change allowance), developing a Flood Emergency Plan in consultation with the EA and LBM and developing a surface water strategy, based on Sustainable Drainage Systems (SUDS), which seeks to provide on site attenuation and reduce runoff to the equivalent Greenfield runoff rates. An 8m set back from the top of the bank of the existing watercourse should also be provided.

6.44 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 affect the flood risk status of the site. Partial regeneration under Option 3 would introduce a higher concentration of residential dwellings within the functional floodplain, however redevelopment of the majority of the Estate presents the opportunity to reduce the likelihood of properties being affected by flooding through the

mitigation measures, as detailed above, being incorporated into the design. This will be fully considered as part of the regeneration considerations, in consultation with the Environment Agency and LBM and work is being undertaken at the moment with regard to the Sequential Test and Exceptions Test. The Sequential work involves consideration of reasonably alternative and available sites within the Borough against a series of criteria, based on the NPPF, NPPG and best practice, to test the appropriateness of each identified site, having regard to the objectives of the proposed regeneration of the Ravensbury Estate. The Exceptions Test will then give consideration to the wider sustainability benefits (those which are set out within this statement) drawing out of the scheme that are considered to outweigh flood risk.

Geotechnical and Geoenvironmental

- 6.45 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.

Taking account of the historic land uses of the site, the study concludes that there is a low likelihood for contamination on the majority of the Estate, rising to moderate in some areas; 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 pile foundations may be required to facilitate new development; however, again, this is not considered to present a barrier to any redevelopment of the Estate.
- 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 partial 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 pressing issues with the current Estate are the energy performance of the stock and the location within a functional floodplain. Other secondary issues have been identified in relation to urban design.

6.49 On this basis, Option 3 presents the most “justified” strategy in terms of environmental and placemaking factors as it would:

- enable a significant uplift in energy efficiency and sustainability when compared to the existing stock as well as the alternative Options 1 and 2;
- although increase the number of dwellings within the floodplain, it also offers the opportunity to introduce mitigation measures to reduce flood risk to a residential area; and
- improve the layout of the Estate to eradicate issues identified in connection with the existing urban design.

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 will deliver better energy performance and will create more naturally surveyed areas from the introduction of more balconies.

7. Considering the Options: Economic Considerations

- 7.1 With all Options proposing substantial works, whether in the form of refurbishment or partial 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 partial 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 HTA and the wider project team have undertaken a series of 10 public events between June 2014 and March 2015.
- 8.3 A summary of the consultation process is included below.

Public Events

1. Residents' Drop-In Event - 10th 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.
- 8.5 Complaints regarding the condition of the existing properties were a common theme, noting problems with damp and heating in winter. Whilst the feedback was fairly unanimous that there needed to be improvements to the existing accommodation, opinions were voiced for and against refurbishment and regeneration options.

2. Residents' Walkabout – 21st June 2014

- 8.6 CHMP and HTA walked around the site with a number of local residents and asked them to talk the project team through what they liked and disliked about different character areas of the site.
- 8.7 The majority of people agreed that the internal parts of the Estate have a quiet, peaceful and pleasant feel; however access into the Estate off Morden Road can often feel unsafe at night.

3. Residents' Design Workshop – 25th June 2014

- 8.8 Having had an opportunity to consider the feedback from the previous sessions a design workshop was held to begin to develop visions for different areas of the Estate.
- 8.9 Some of the key points arising out of this workshop were a desire for good quality and sized private amenity space, large room sizes, no communal gardens and improved energy

efficiency. Better quality public realm, including better street lighting, better maintenance and better lit entrances to properties was also raised.

- 8.10 Feedback also indicated support for a residential mix that catered more for elderly people.

4. Residents' Site Visits – 5th July 2014

- 8.11 A group of residents were invited to visit some other recent developments to comment on what they liked and did not like.
- 8.12 This feedback again indicated the importance to existing residents of ensuring that any redesign included a good quality and quantity of amenity space and that they did not want the density to increase, taking away the suburban feel to the Ravensbury Area.

5. Older People's Focus Group – 16th July 2014

- 8.13 This session focussed on what people would like to see at Ravensbury in terms of meeting the need for elderly people's accommodation which saw support for such provision on the site and emphasised the importance of private amenity space for residents.

6. Refurbishment Focus Group – 30th July 2014

- 8.14 This session asked attendees to rank possible works for refurbishment of the existing stock to get a clear idea of priorities for residents.
- 8.15 Including both internal and external suggestions, the main comments reflected the utmost importance of internal works, including new bathrooms, kitchens and windows, ahead of any more costly external works.
- 8.16 Support was also expressed for the continued enhancement and maintenance of communal areas as they are well used. Whilst new private amenity space was of interest to some residents, a number of others raised concern about how this would impact on the appearance and feel of the area.

7. Resident's Drop In Event – 9th August 2014

- 8.17 The purpose of this session was to get a better understanding of what peoples priorities would be within a regeneration scheme for the type of accommodation they would like to see.
- 8.18 Feedback was obtained on a variety of house types including older people's homes, flats, maisonettes, mews houses and town houses.

8. Residents' Site Visit – 4th October 2014

- 8.19 Repeating a similar format to Event 4, this saw CHMP and HTA take another group of residents to some other developments to gain feedback on what they liked and didn't like.
- 8.20 The clear feedback from this event was a preference for a brick appearance for any redevelopment and support for 3 storey flats as a unit type alongside semi-detached houses.

9. Draft Masterplan Community Event – 1st, 3rd and 5th November 2014

- 8.21 Building from all the feedback received from the previous events, this series of three workshops tabled CHMP's emerging masterplan vision for the partial refurbishment and partial regeneration of the Estate.
- 8.22 A total of 123 people attended and 31 completed the tick box feedback. Some of the key points drawing out of the feedback were:

- 45% indicated their support for the layout, with only 16% indicating that they disliked the proposals.
- 39% supported the new home designs.
- 46% indicated support for the sizes of the new homes.
- 68% indicated their support for more energy efficient homes.
- 52% supported the design of new open space and landscaping.

10. Residents' Workshop (focussed on Parking, Planting and Phasing) – 12th March 2015

- 8.23 With this session focused on specific issues, some of the key points are highlighted below:
- When asked which area of the Estate they currently live in and, ideally, which phase would they like to live in after construction, no residents indicated that they would like to live within the refurbished properties. This implies that all attending residents wanted to move into the new properties.
 - When asked what size of property they currently live in and, ideally, what size of property they would like to live in after construction, there was a trend in resident answers moving away from 1 bedroom units towards a more even split of 2 and 3 bedroom units, with the addition of 4 bedroom units into the Estate.

Other Consultation

- 8.24 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. This is a crucial stage of the overall proposals for the Estate.

- 8.25 In moving forward, CHMP are committed to continuing this process of community engagement.

Newsletters

- 8.26 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.

Phase 1 Public Consultation

- 8.27 The most recent consultation events have specifically related to Phase 1. The previous events were however influential in the design and layout of the Phase 1 proposal, as it forms part of the wider Ravensbury masterplan.
- 8.28 During the detailed design process of Phase 1, further public consultation events were held to provide an opportunity for the communities to be involved in the scheme development. These events were held between the 23rd to 26th January 2016 (public consultation on draft design proposals) and 23rd April 2016 (public exhibition of proposed planning application submission).

Conclusions

- 8.29 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.
- 8.30 General feedback from the events indicated that people liked living on the Estate, however the condition of the properties, as well as their size, were becoming a key concern.
- 8.31 Possibly the most informative feedback from the events is that from Event 10, where no one indicated a preference to live in refurbished properties and indicated a clear shift in the size of units they would like to live in. Although this suggests a potential preference towards Option 3 from some parts of the community, there is no clear support for one Option above any other, and have therefore ranked them 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 Ravensbury Estate, Morden 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 – Partial redevelopment.
- 9.3 The main driver for regeneration on the Estate is the presence of the “defective” Orlit constructed houses. With the existing condition of the stock highlighting some key issues, including the relatively poor energy performance, as well as generally dated facilities, doing nothing is no longer an Option; it would not be “justified”.
- 9.4 Given the location of the Orlit houses to the west of Ravensbury Grove, and the comparatively high number of third party interests that would need to be acquired for site assembly to the east of Ravensbury Grove, it would not be justified or effective to proceed with a full regeneration on this Estate.
- 9.5 The three Options that have been considered in detail in this document 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 partial regeneration for a longer time period, whilst also boosting the overall volume of units, is considered to be preferential. Partial regeneration would therefore be “justified” and “consistent with national policy”. Further, in helping to meet already objectively assessed development requirements, a Local Plan which supports this approach would be “positively prepared”.

- 9.6 In consideration of socio-economic factors, the existing housing stock does not efficiently meet the housing needs of the current residents, with the assessment highlighting overcrowding and an inefficient housing mix as particular issues. Only Option 3 gives CHMP the opportunity to rebalance the mix of stock within the Estate to better meet current affordable housing needs. Partial 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. Partial regeneration would therefore be “justified” and “consistent with national policy”.
- 9.7 With regard to environmental and place making factors, the primary issues identified were energy performance and the location of the Estate within a functional floodplain. 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. Whilst partial redevelopment of the Estate would increase the volume of residential properties within the floodplain, Option 3 also offers the opportunity to mitigate against the likelihood of future flood events affecting properties through a range of design measures. Partial regeneration would therefore be “justified” and “consistent with national policy”.
- 9.8 Economic and financial modelling work 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 partial regeneration (Option 3) 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.
- 9.9 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.
- 9.10 For the reasons set out above, it is considered that this document clearly demonstrates that Option 3, for the partial regeneration of the Ravensbury Estate, is the most preferable Option when considered against reasonable alternatives, and therefore that there is a Case for Regeneration.
- 9.11 It would therefore be a sound approach for the emerging Estates Plan DPD to support the partial regeneration of the Ravensbury Estate, as it would be based upon a “positively prepared” strategy, 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).