

London Borough of Merton
Sustainability Appraisal
Estates Local Plan



Sustainability Appraisal **Post Adoption Statement**

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1 Introduction

- 1.1 This document provides the [Post Adoption Statement of the Sustainability Appraisal](#) of the London Borough of Merton's [Estates Local Plan \(ELP\)](#). The ELP, adopted on 7th February 2018 forms part of Merton's Local Plan, which collectively will provide the detailed planning and design guidance for the regeneration of the Eastfields, High Path and Ravensbury Estates over the next 10 to 15 years.
- 1.2 Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.
- 1.3 When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12 (The SEA Regulations).
- 1.4 Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the '[National Planning Policy Framework \(NPPF\) 2012](#)' and '[National Planning Practice Guidance \(NPPG\)](#)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

2 The Post Adoption Statement

- 2.1 This Post Adoption Statement has been prepared in accordance with the paragraph 16 (3) and (4) of the SEA Regulations, which require a statement to be produced on adoption of a plan or programme. The Statement should include:
- a. How sustainability considerations have been integrated into the plan or programme
 - b. How the Sustainability Report (SA report) has been taken into account
 - c. Details of the consultation undertaken and how opinions expressed in response to the public consultation have been taken into account
 - d. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

- e. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

3.0 Background to the Estates Local Plan

- 3.1 The Estates Local Plan covers three existing housing estates within Merton: Eastfields (Mitcham); High Path (South Wimbledon) and Ravensbury (Morden / Mitcham). The Estates Local Plan is an essential tool in shaping and managing the redevelopment process of the estates to create new, well designed, high quality neighbourhoods aimed at fundamentally improving the quality of life for existing and future generations living in the area. The Plan's purpose is to guide any redevelopment proposals for the three estates that come forward within the next 10-15 years.
- 3.2 Clarion Housing Group (Clarion) acquired the ownership and management of the estates in 2010 as part of a Housing Stock Transfer Agreement (HSTA) containing all the Council housing stock within Merton, totalling circa 9,500 units. Clarion is the majority landowner of the estates, owning about 60% of the three estates. Clarion will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes.
- 3.3 In September 2014, near the start of the project, the Council jointly signed up to the following list of 10 commitments with Clarion to ensure residents get the best out of any regeneration proposals for the three estates:
1. Clarion will consult with residents, consider their interests at all times, and address concerns fairly.
 2. Current homeowners will be entitled to at least the market value of their home should they wish to take the option to sell their home to Clarion.
 3. Current tenants will be entitled to be rehoused in a new home of appropriate size considering the number of people in the household.
 4. Existing Clarion tenants will keep all their rights and have the same tenancy agreement, including rent levels, in the new neighbourhood as they do now.
 5. All new properties will be more energy efficient and easier to heat than existing properties, helping to keep down residents' fuel bills.
 6. Clarion will keep disruption to a minimum, and will do all it can to ensure residents only move once if it is necessary to house them temporarily while their new home is being built.
 7. Clarion will offer extra help and support for older people and/or disabled residents throughout the regeneration works.
 8. Clarion will continue to maintain the homes of residents across the three neighbourhoods throughout the planning process until regeneration starts, including ensuring a high quality responsive repairs service.
 9. Any growth in the number of homes will be in accordance with the Council's Development

Plan so that it is considered, responsible and suitable for the area.

As a not for profit organisation, Clarion will not profit from any regeneration and will use any surplus to provide more housing or improve existing neighbourhoods.

4.0 The Estates

Details of the individual estates are as follows:

4.1 Eastfields

The Eastfields Estate is located towards the east of the London Borough of Merton (LBM), within the Figges Marsh ward. Broadly rectangular in shape, the Estate sits to the north west of Streatham Park Cemetery and is bounded by Acacia Road / Mulholland Close to the north west and Clay Avenue to the east, south and west. Mitcham Eastfields Railway Station is around 5 minutes walk to the west of the Estate.

The estate area totals approximately 6.87 hectares. Originally constructed in the late 1960s to early 1970s, the estate currently comprises 466 dwellings, comprising a mix of three storey town houses and flatted blocks. The site is laid out with residential blocks on the perimeter of the rectangular site and communal amenity space to the centre. The properties include a mix of tenures including private ownership (as a result of right to buy) and social rent.

The estate is in a predominantly residential area, where the scale of built development surrounding the site varies considerably. The exceptions to this are the two storey St Marks Academy and playing areas, located to the north of the site, and the Cemetery to the south. The built development to the west of the site is predominantly terraced and detached houses of two to three storeys. There are no non-residential land uses on the site at present.

4.2 High Path

High Path Estate is located towards the centre of the London Borough of Merton (LBM), within the Abbey ward, to the south and east of South Wimbledon Tube Station. Much of the existing Estate was built between the 1950s and 1980s and is the largest of the estates within this portfolio.

The Estate area totals approximately 7.2 hectares and currently comprises 608 residential dwellings in a mixture of tower blocks, flats, maisonettes and terraced houses. Accommodation forms a mix of tenures including private ownership (as a result of right to buy) and social rent. The number of storeys across the site ranges from 1 to 12. Parking on the estate is provided by surface parking courts and garages.

Merton High Street establishes the northern boundary of the site, comprising various commercial and retail units. There are two storey residential dwellings to the east of the site, and adjacent to the south eastern boundary of the site are part-single and part-two storey industrial / commercial buildings (The Old Lamp Works). South of the site, on the opposite side of High Path, is a community resource centre and east of this is a two-storey church. Merton Abbey Primary School and a church are also located to the south of the site adjacent to High

Path road. To the west are two to four storey houses, with South Wimbledon station located at the north-western corner.

4.3 Ravensbury

The Ravensbury Estate is located towards the south of the borough, within the Ravensbury ward, to the south east of Morden town centre. The estate sits alongside the River Wandle, between Morden Hall Park and Ravensbury Park with Morden Road wrapping around its western and northern perimeters. The estate was originally constructed between the late 1940s and mid 1950s as part of the post-World War II housing boom.

The Estate area totals approximately 4.42 hectares. 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. There is also a small community facility of approximately 140 sqm.

In addition, 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.

5.0 The Sustainability Appraisal (SA) Process

The NPPG sets out the stages that should be followed when carrying out a Sustainability Appraisal in relation to the plan preparation as set out below, which has been followed in the preparation of the Plan. This report forms stage **E1** of the process.

Sustainability Appraisal Stages	ELP Preparation
STAGE A: SCOPING REPORT	
A1: Identify other relevant plans, programmes and sustainability objectives	Evidence gathering and engagement
A2: Collect baseline information	
A3: Identify sustainability issues and problems	Consult on draft ELP
A4: Develop SA framework, including objectives, indicators and targets	
A5: Consult the consultation bodies on the Scope of the SA report	Prepare the publication version of the ELP
STAGE B: DRAFT SUSTAINABILITY REPORT	
B1: Test the plan objectives against the Sustainability Appraisal framework	CONSULT ON THE ELP
B2: Develop the plan options including reasonable alternatives	Submit draft ELP and supporting documents for
B3: Evaluate the likely effects of the plan and alternatives	
B4: Consider ways of mitigating adverse effects and maximising beneficial effects	
B5: Propose measures to monitor the significant effects of implementing the plan	
STAGE C: PREPARE THE SA REPORT	
C1: Prepare the Sustainability Appraisal Report	
STAGE D: CONSULT ON THE SA REPORT	
D1: Consult on the draft plan and SA Report	

D2: Assess any significant changes as a result of the consultation
D3: Finalise Sustainability Report
STAGE E: POST ADOPTION REPORTING AND MONITORING
E1: Prepare and publish post-adoption statement
E2: Monitor significant effects of implementing the plan
E3: Respond to adverse effects

Examination
Outcome of Examination - consider implications for SA
Estates Local Plan Adopted
Monitor and Report on the implementation of the ELP

6 Integration of Sustainability within the Plan

- 6.1 The Estates Local Plan is an essential tool in shaping and managing the re-development process of the Eastfields, High Path and Ravensbury estates to create new, well designed, high quality neighbourhoods, aimed at fundamentally improving the quality of life for existing and future generations living in the area. The Plan has sought to integrate the principles of sustainability throughout, with the options and policies assessed in the SA, at each stage of the Plan process. As a result, the selection of the preferred option and policies have been amended and strengthened where necessary to ensure that the sustainability objectives have been suitably addressed.
- 6.2 When considering the development proposals the Council will also take a positive approach, which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The Council will work proactively with applicants to find joint solutions to enable proposals, which can be approved wherever possible, to secure development that improves the economic, social and environmental conditions of the area.

Sustainability Appraisal Process

Scoping Report, September 2014

- 6.3 The Scoping Report sets out the context and scope of the SA in accordance with the regulations and best practice guidance. An initial Scoping Report was prepared for the Core Strategy, which was published for consultation and set out the proposed methodology for

the SA. The Core Strategy SA framework was therefore used to inform the Scoping Report for the SA of the ELP, issued in September 2014, as recommended by guidance.

6.4 The Scoping Report, prepared in house by the Council, was forwarded to the statutory consultees to ensure that the proposed scope of work was appropriate, including:

- The Environment Agency
- Natural England
- English Heritage (now Historic England)

6.5 The neighbouring local authorities and other key stakeholders were also consulted. Responses to the consultation were received from the statutory consultees shown above.

Issues and Options SA Report, September 2014

6.6 An SA Report of the Issues and Options for the Estates Local Plan (IOELP) was issued for consultation in September 2014. Responses were received from the statutory consultees and a total of 283 responses were received from residents of the estates during the consultation period.

Draft Estates Local Plan SA Report, February 2016

6.7 The Draft Estates Local Plan SA Report was published for representations alongside the draft ELP in February 2016 until 18 March 2016. Over 300 representations were received including responses from the statutory consultees; the Environment Agency, Natural England, Historic England and the Greater London Authority.

Submission Draft Estates Local Plan SA Report, November 2016

6.8 The Submission Draft Estates Local Plan SA report was published for consultation between December 2016 and February 2017. A total of 270 responses from 41 respondents were received.

Submission Version Estates Local Plan SA Report, March 2017

6.9 The Submission Version Estates Local Plan and SA Report were submitted to the Secretary of State on 31st March 2017. An independent Examination in Public was held from the 4-6 July 2017 to consider the Plan. Following the examination, the Inspector issued an outline of main modifications required to make the Plan sound.

Main Modifications Estates Local Plan SA Report, September 2017

6.10 As a result of the Examination in Public, three overarching policies were added to the ELP: OEP1 Vision; OPE2 Strategy and OEP3 Urban Design. The policies did not add anything new to the plan but were largely taken from supporting text within the Submission Version. An assessment of the Plan Policies was carried out against the revised SA framework, including the new policies for completeness. The Main Modifications Estates Local Plan and SA report were

published for consultation in September 2017. The SA assessed the options and policies considered in the development of the Plan. The report updated the Submission Version SA report to take into account the proposed main modifications to the ELP and also corrected any minor errors that had been identified.

The full reports and responses to the consultations can be accessed on the Council's website at <http://www.merton.gov.uk/estatesplan>

- 6.11 In addition to the Sustainability Appraisal, an Equalities Impact Assessment, Health Impact Assessment and Habitats Regulations Assessment have also been carried out to ensure that sustainability issues are fully integrated within the Plan.

Equalities impact Assessment

- 6.12 The Equality Act 2010 replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it's unlawful to treat someone. Before, the Act came into force there were several pieces of legislation to cover discrimination, including:
- Sex Discrimination Act 1975
 - Race Relations Act 1976
 - Disability Discrimination Act 1995
- 6.13 At the decision making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics'- which includes the following:
- Age
 - Disability
 - Sex/Gender
 - Race or belief
 - Religion
 - Sexual Orientation
 - Gender Reassignment
 - Marriage and Civil Partnership
 - Pregnancy and Maternity
- 6.14 As with the SA the EqIA has informed and influenced the development of the Plan towards adoption. A specific indicator on Diversity and Equality was added to the SA Framework to ensure that equalities issues were identified, although there will be an impact within many of the Sustainability Objectives, for example, housing, social deprivation, health and wellbeing and access to services and facilities.



Health impact Assessment

6.15 Although not a statutory requirement, Merton Council has carried out a Rapid Health Impact Assessment in accordance with the Mayor of London's Social Infrastructure Supplementary Planning Guidance, London Healthy Urban Development Unit (HUDU) planning checklist and Rapid HIA tool. The London Plan policy 3.2 Improving health and addressing health inequalities (part c) states that:

'New development should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce inequalities.'

6.16 The purpose of an HIA is to promote sustainable development by integrating health and well-being (including mental health) considerations into the preparation of plans or strategies; by identifying the key health and wellbeing issues and the groups that are likely to be affected by the implementation of the Plan in accordance with the aforementioned London Plan policy.

6.17 The HIA has been used to assess each stage of the Plan's making process and make recommendations to mitigate identified negative impacts, to enhance the proposals or to secure a positive impact. The final HIA report shows how the final draft of the Plan will secure health and wellbeing benefits; and how identified adverse impacts in the earlier drafts of the Plan have been avoided or minimised.

Habitat Regulations Assessment

6.18 The EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna) passed in to domestic law by way of the Habitats Regulations (Conservation (Habitats &c) Regulations, 1994). As a consequence any development proposal that is not part of a specific management prescription that might have a significant effect on a Natural 2000 sites (also known as European sites) must be subject to Appropriate Assessment (AA).

6.19 Regulation 48 of the Habitats Regulations responds to the provisions of Article 6 (3) and (4) of the Directive which sets out provisions for determining whether the plan is likely to have a significant effect on the integrity of a Natural 2000 Site, including Special Protection Areas, Ramsar sites (Wetlands sites) and Special Areas of Conservation.

Habitats Regulations Assessment Screening

6.20 The Habitats Regulations identifies Merton Council as the 'Competent Authority', which is responsible for deciding whether adverse effects are likely. The Council has consulted with Natural England, the Government's advisor in this respect. Consideration has been made of the objectives and proposals of the Plan against the conservation objectives for European sites. Whilst the screening process has determined that it is not likely that the Plan would lead to any adverse impact on the integrity of European sites, emerging issues have informed the Sustainability Appraisal:

- Wimbledon Common Special Area of Conservation and Sites of Special Scientific Interest (SSSI) 1.5km to the north west of Wimbledon town centre has been designated primarily to protect the Stag Beetle *Lucanus cervus*. It is also an important example of two habitats: Northern Atlantic wet heath with *Erica Tetralix* and European dry heaths
- Richmond Park Special Area of Conservation, west of Wimbledon is also designated to protect the Stag Beetle. The Royal Park is closed every night at dusk
- Air pollution can have an adverse impact on the habitats and/or the stag beetle
- Recreation can have an adverse impact on the habitats and/or stag beetle.

7 How the SA Report has been taken into account

- 7.1 A Sustainability Appraisal has been undertaken and an SA Report has been published at each key stage of the plan making process, in order to ensure that sustainability issues have been considered in the development of the plan. The following documents have been produced:
- Scoping Report of ELP, September 2014
 - Issues and Options SA Report, September 2014
 - Draft Estates Local Plan SA Report, February 2016
 - Submission Draft Estates Local Plan SA Report, November 2016
 - Submission Version Estates Local Plan SA Report, March 2017
 - Main Modifications Estates Local Plan SA Report, September 2017
- 7.2 The ELP has been assessed against the SA framework to establish the likely significant effects, both positive and negative, of the options and policies. The SA framework sets out the Sustainability Objectives, Indicators and Targets, which have been used to assess the likely impacts of the plan. The Sustainability Objectives for the plan have drawn upon the sustainability objectives developed for the Core Strategy and Sites and Policies Plan and been developed in consultation with the statutory consultees and other key local stakeholders.
- 7.3 Further amendments were made to the Objectives as a result of the consultation responses and the review of the SA work. SO3 River and Water Quality was separated from SO4 Water Resources and Infrastructure and SO11 Built Environment and SO11 Historic Environment were also separated in order to ensure clarity in the assessment of the issues being assessed. The following Sustainability Objectives were also added for completeness: SO7 Noise; SO20 Diversity and Equality; SO23 Education and Skills and SO26 Viability and Deliverability. Indicators were also added to the SA framework to enable future monitoring.
- 7.4 As a result of the responses to the consultation on the SA reports, some gaps were identified in the baseline information that needed to be addressed. The review of the SA process also revealed a lack of information on specific issues relating to each of the estates, in particular with regard to the Historic Environment and Archaeology Priority Areas, which were added to the Submission Draft ELP, November 2016. Following the publication of the Submission Draft ELP and SA report, new evidence was also prepared in support of the Plan and considered in the SA, which included:
- Housing Market Assessment for the Estate Regeneration Areas, February 2017
 - Estates Local Plan Viability Assessment, March 2017
- 7.5 In order to ensure that the Sustainability Objectives were compatible a compatibility assessment was carried out which found the objectives to be broadly compatible or neutral (no link) with a couple of potential incompatible objectives identified. Potential incompatibility was

shown against the following objectives SO16: Housing and SO24: Economic Growth, in relation to SO2 Climate Change.

7.6 The Plan objectives were also assessed against the sustainability objectives to check their compatibility. The assessment showed that the ELP objectives were largely compatible. Two areas of potential incompatibility were found with regards to ELP Objective 3 - To Provide New Homes and Infrastructure and ELP 4 - To Make Merton more Prosperous, which scored uncertain impacts against the majority of the Sustainability Objectives.

7.7 The building of new homes is likely to have a negative impact on climate change and resources owing to the increase in CO₂ emissions and waste that will be produced. However, mitigation of potential negative impacts has been considered in the SA of the options and policies and will be addressed through the design and approach to development, which will be managed by development management policies, in the application of the Plan.

7.8 The SA reports set out the likely significant effects of the ELP, including alternatives, and evaluated the likely effects of the plan. The assessments were carried out in the form of a matrix and included the identification of potential mitigation measures. The assessments included the prediction and evaluation of the likely significant effects including:

- short, medium and long term effects
- temporary and permanent, direct and indirect effects
- cumulative or synergistic effects
- consideration of mitigation measures
- proposals to monitor the effects of the plan

7.9 The overarching vision for the ELP is now included within a new Policy OEP1:

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

Separate visions have also been developed for each estate, which have drawn on the positive characteristics within and surrounding each area.

Sustainability Effects of the Policies

7.10 The majority of the effects of the policies were found to be positive. Where uncertainty was recorded it related mainly to the impact upon environmental objectives, particularly in relation to the policies on Land use and Environmental Protection for each of the estates. The main reasons for uncertainty arise because of the lack of detail at this stage of the design proposals and the specific mitigation measures that could be used to minimise any adverse impacts. Negative impacts were recorded in relation to climate change, energy and carbon and waste as a consequence of the amount of new development that will occur. Detailed mitigation measures will need to be identified within the design proposals in accordance with the ELP and Statutory Development Plan policies, which could result in the impacts being reduced, particularly in the long term.

7.11 The ELP will form part of the Development Plan for the Borough, which contains the planning policies that guide development in Merton. Collectively the plans will provide the detailed planning and design guidance for the regeneration of the Eastfields, High Path and Ravensbury Estates over the next 10 to 15 years. The Plans should be considered as a whole, including the following documents:

- The Mayor’s London Plan 2016

- Merton's Core Planning Strategy 2011
- The South London Waste Plan 2012
- Sites and Policies Plan 2014
- Policies Map 2014.

Cumulative Impacts of Policies

Positive impacts

- 7.12 The regeneration of the estates would allow for the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The development will enable the layout and open space to be reconfigured to improve access to activities and improve safety through and within the estate. The regeneration is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development. The cumulative impacts for all policies receive a major positive impact in relation to Housing as again they will enable the Borough to meet the current housing needs and projected changes in population growth.

Negative Impacts

- 7.13 Negative cumulative impacts were recorded for Climate Change and Waste. The level of regeneration on the estates will result in an increase in greenhouse gas emissions and waste generated. The policies also receive a negative impact regarding energy and carbon as the regeneration will also result in an increase in energy consumption. Mitigation measures will need to be identified in the detailed design to minimise any adverse impact in accordance with the plan policies.

Uncertain Impacts

- 7.14 Uncertain impacts were recorded against several of the environmental objectives in relation to issues such as pollution, the historic environment and transport. The uncertainty of the impacts should be reduced through the design of the proposals. The proposals will need to give due consideration to the issues identified to ensure that the regeneration addresses them appropriately.

No significant impact

- 7.15 No significant impact is recorded for the policies with regard to education and skills.

Equalities Impact Assessment - SA Findings

- 7.16 The assessment has shown that the regeneration will result in major positive impacts for the issues of housing, access to activities and social deprivation. Minor positive impacts are achieved for diversity and equality and education and skills.
- 7.17 The regeneration will enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need, as identified in the HMA of the Estate Regeneration Areas, February 2017. All existing affordable housing will be re-provided on each estate with no net loss of affordable habitable rooms or floorspace.
- 7.18 The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of new community space and improved accessibility within the estates and to the wider area will help to promote community cohesion.
- 7.19 Regeneration is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.
- 7.20 The level of impact is uncertain at this stage with regards to health and wellbeing and services and facilities. The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents. An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in several of the current structures.
- 7.21 The opportunity for new layouts within the estates that the regeneration will provide should ensure that accessibility to and within the site is improved for all. The sites are relatively well served by social infrastructure including schools, health, leisure and community facilities. An assessment of the impact of the increase in population upon the existing facilities will be required as part of the design process.

Impacts of the Regeneration Proposals

- 7.22 The regeneration of the Estates provides an opportunity for Clarion to provide high quality homes of the right size for their tenants and resident homeowners taking in to account the specific needs of the individual and so catering for needs arising due to an individual having a protected characteristic and seeking to eradicate inequalities.

- 7.23 New affordable homes, which replace the existing, will be covered by the current Nomination Agreement that ensures 100% of True Voids are made available as nominations to the Council. When the planning consents confirm that new affordable homes for rent will be provided (which are not replacements of existing affordable homes), the Council will need to negotiate and enter into a new supplementary agreement for nominations.
- 7.24 Negotiations have begun with Clarion on the use of void properties on the estate, especially those bought back from owners, with the intention of using them to help the Council with the discharge of its obligations to people that are homeless or in housing need.
- 7.25 Regeneration also provides an opportunity for Clarion to reduce overcrowding amongst its tenanted households. Overcrowding is proportionately more likely to affect households from the BAME community and so the regeneration provides an opportunity to address inequality in this area. Significant amenity and size improvements will be provided for residents, with all new homes built to current space standards with private outdoor space.
- 7.26 Some of the properties are in need of major structural works or can be expected to fail in the next few years. This is particularly important in respect of the Orbit houses in Ravensbury. Replacing or very major repairs to these properties will be required, probably during the anticipated life of the regeneration programme.

- 7.27 The regeneration is an opportunity to provide new lifetime homes for all tenants, this will enable older tenants (and homeowners) to remain independent in their own homes for longer. New homes can be adapted to meet the specific needs of disabled residents, 10% of all new homes will be fully accessible and adaptable for wheelchair users.
- 7.28 However, it is acknowledged that the process of redeveloping the estates itself is likely to have a negative impact on older, disabled and vulnerable residents, due to the requirements to move house, potentially more than once, if temporary accommodation is necessary during the construction period.
- 7.29 Clarion has committed to designing the construction phases to minimise the need to “double decant” and where at all possible older, vulnerable or disabled tenants will only be asked to move once, straight in to a new home. Help will be provided to assist with such moves.
- 7.30 A key expectation of any regeneration proposal that comes forward will be a commitment to keeping the existing community together in each neighbourhood and for existing residents to have a guaranteed right to return to a new home in their regeneration neighbourhood.
- 7.31 The greatest impact on equalities will be the mechanics of the delivery of the Estates Local Plan including: the residents’ offer; moving existing residents into new homes; addressing overcrowding; and minimising disruption during this extensive process. Clarion has undertaken an Equalities Analysis of their proposals and it is recommended that this is reassessed regularly during the regeneration delivery process.

Proposed Mitigation Measures

- 7.32 The results of the SA showed that overall the ELP performs well, with the majority of the impacts regarded as positive. Some uncertain and minor negative impacts were identified with regard to environmental issues, particularly in the short term as a result of construction. Suitable mitigation measures will need to be identified through the design and development management process. The proposed mitigation measures are set out below:

Air Quality, Noise and Pollution

- 7.33 Merton is an AQMA. The redevelopment may result in adverse impacts as a result of demolition, construction and an increase in traffic. An Air Quality Impact Assessment will be required as part of any future planning application to ensure suitable mitigation measures have been identified. The control of dust and emissions during construction and demolition will also need to be considered in the development proposals, reference should be made to the Mayor’s SPG 2014.

Climate Change and Energy

- 7.34 The scale of development will increase the amount of energy consumed and is likely to result in an increase in greenhouse gas emissions and non-renewable sources of energy. Central to the case for regeneration is the need to improve the environmental performance of the

dwellings on the estates.

7.35 All development will need to comply with the London Plan Climate Change policies and the Core Strategy's [Policies CS14 Design and CS15 Climate Change](#), which should ensure that suitable mitigation is identified and applied. Particular attention should also be given to LP Policy 5.3 Sustainable Design and Construction.

7.36 Consideration should also be given to the following development management policies, as set out in the Sites and Policies Plan:

[DM D2](#) [Design Considerations in all developments](#)

[DM EP1](#) [Opportunities for decentralised energy networks](#)

[DM EP3](#) [Allowable Solutions](#)

[DM EP4](#) [Pollutants](#)

Further guidance is also provided in the Mayor's Sustainable Design and Construction SPG 2014.

7.37 Energy strategies will need to clearly demonstrate that development complies with the Mayor's Energy Hierarchy and emission reduction targets. The scale of the development provides the opportunity to assess whether district-heating networks could be implemented in order to reduce carbon emissions, particularly in the long term. The Council will continue to work closely with the GLA and the Heat Network Delivery Unit in order to deliver a site-specific energy strategy appropriate for each development site, in accordance with development plan policies.

[Transport](#)

7.38 Development should seek to make the estates well connected places where walking, cycling and public transport are the modes of choice when planning all journeys, in line with the Core Strategy policies 18-20 and development management policies [DM T1-5](#).

7.39 Where the development proposals will have a significant impact upon transport, a Transport Assessment and other relevant documents including Travel Plans and Construction Management Plans will be required in accordance with TfL's Transport Assessment Guidance. Proposals for vehicular movement must be supported by appropriate traffic modelling, transport and assessment and travel plans and be in general compliance with transport policies, whilst aiming to achieve good vehicular permeability and convenience for residents. The development is likely to put increased pressure on the capacity of public transport, which will need to be considered in the proposals.

[Waste Management](#)

7.40 The regeneration will result in an increase in waste produced both in the construction and operation of the development. Development will need to comply with Core Strategy Policy CS17 regarding waste management and the South London Waste Plan. New development will be required to provide integrated, well-designed waste storage facilities that will include recycling facilities where appropriate. Construction Waste Management Plans will need to be

submitted as part of any proposals.

Water Resources, Water Quality and Flood plain

- 7.41 The regeneration of the estates includes areas within Flood Zone 2 with some areas of Flood Zones 3a and 3b within the functional floodplain of the River Wandle, which could result in a higher concentration of dwellings in the functional floodplain. Mitigation measures such as setting accommodation at 300mm above the relevant 1% annual probability flooding event (including climate change allowance) should be considered as well as the need for flood resilient and resistant design of development. A SuDS strategy will need to be developed to provide on site attenuation and manage surface water runoff. Consideration should also be given to the potential for rainwater harvesting in line with the Mayor's drainage hierarchy. Any development coming forward will be subject to a Sequential Test, Exceptions Test and Site-Specific Flood Risk Assessment, which must have regard to Merton Strategic Flood Risk Assessment and Surface Water Management Plan. The need for additional sewerage capacity will need to be considered to address the increase in population.

Open Space and Biodiversity

- 7.42 Development will need to comply with Core Strategy policy CS13 Open space, nature conservation, leisure and culture and DM policies O1-2. The redevelopment offers the opportunity to improve the quality of provision and enhance the biodiversity of the site and surrounding area through measures such as green corridors, ecological enhancement and the use of green/brown roofs. Mature trees should be protected wherever possible.

Viability and Deliverability

- 7.43 The regeneration of the Eastfields, High Path and Ravensbury Estates is considered as a single project for economic purposes by Clarion 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.
- 7.44 Greater clarity will be needed on the viability and deliverability of the proposals, and the phasing and decanting proposals. Proposals will need to be drawn up which minimise the disruption to existing residents as far as possible. Further work will also be needed to examine the specific issues that relate to each estate in order to determine how they can be addressed in the design proposals to achieve sustainable development.

8 Consultation Responses

8.1 A wide range of consultation measures has informed the development of the ELP, from the initial inception of the development of options to the specific policies. Consultation has been undertaken on the following documents:

- Scoping Report of ELP, September 2014
- Issues and Options SA Report, September 2014
- Draft Estates Local Plan SA Report, February 2016
- Submission Draft Estates Local Plan SA Report, November 2016
- Submission Version Estates Local Plan SA Report, March 2017
- Main Modifications Estates Local Plan SA Report, September 2017.

8.2 Formal consultation was undertaken by the Council in line with regulatory and best practice guidance regarding plan making and the associated Sustainability Appraisal process. The consultees included the Statutory Consultees: Natural England; The Environment Agency; and Historic England, as well as key local stakeholders including the Greater London Authority. Full details of the consultation measures undertaken, and responses received, are set out within Statement of Consultation published with the Estates Local Plan.

8.3 The full representations made in relation to each stage of the SA consultation can be found on the Council website at <http://www.merton.gov.uk/estatesplan>. A summary of the key issues raised is set out below. The SA took all the representations into account in the assessment, to make sure that the issues raised had been properly addressed.

8.4 Further consultation was also carried out by Clarion with the residents of each of the estates. Consultation exercises included:

- drop in events for residents to share their views on the potential regeneration
- site visits to other recent regeneration projects to see what they liked and disliked about the developments
- themed workshops and focus groups for residents to comment on emerging regeneration proposals
- consultation events on the draft masterplans.

[Scoping Report, September 2014](#)

8.5 Representations were received from each of the statutory consultees; Environment Agency, Natural England and Historic England, in response to the consultation on the Scoping Report. The key issues raised were as follows:

8.6 The [Environment Agency](#) (EA)

- There is a need to clarify if any new development is anticipated or if the plan is to renovate

the existing homes

- A significant part of Ravensbury estate lies in a high flood risk area and any regeneration will require appropriate flood management and mitigation measures. Due consideration should be given to local flooding constraints identified within the Borough's Strategic Flood Risk Assessment (SFRA) and Surface Water Management Plan when considering the location of and capacity for development.
- Any additional development in the area should consider the following issues:
 - correctly apply the sequential test, steering new development to the lowest flood risk zone appropriate to the proposed use, and the exception test where necessary
 - reduce flood risk through making space for water
 - where climate change is expected to mean that some existing development may not be sustainable in the long-term, use regeneration to help relocate existing development to lower risk locations
 - development will not encroach into the buffer zone adjacent to any open watercourse, so as not to jeopardise flood defence interests, hinder future maintenance or adversely affect the character or habitat value of the watercourse.

8.7 [Natural England](#) (NE)

- The Council will need to ensure and advise developers and estate managers of potential impacts on local sites such as Local Nature Reserves and Sites of Interest for Nature Conservation (SINC's). Consideration of improvements and enhancements could be considered as part of the proposal, alleviating issues of deprivation for access to nature and improving connectivity and green infrastructure.

8.8 [Historic England](#) (formerly English Heritage)

- More specific information is needed about which heritage assets are impacted by the proposed policies. This needs to clearly set out the impacts on listed buildings, conservation areas, registered parks and gardens of historic interest, scheduled monuments and the settings of these assets, as well as archaeological priority areas. Any heritage assets at risk that might be affected by the proposed policies, should also be identified.
- The sustainability appraisal objective for the historic environment should be kept as clear and simple as possible to ensure that impacts on the historic environment are not inadvertently masked by other elements such as townscape and new building design. It is recommended that the objective matches the core planning principle of the NPPF in relation to the historic environment i.e. "does it conserve and enhance heritage assets and their settings?"

8.9 The Baseline information was updated to reflect the comments from Historic England and a separate objective on the historic environment was added to the Sustainability Appraisal Framework, in line with the comments above.

[Issues & Options SA Report, September 2014](#)

8.10 The Environment Agency and Historic England responded but did not raise any substantive new issues. Natural England also responded and recommended the following:

- Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. The Council should seek to link green infrastructure across and between the estates and other facilities, where appropriate, potentially linking into the ALGG and or the Wandle Park through green chains, corridors or links helping to ensure that area's green infrastructure, both current and planned are designed to deliver multiple functions.

8.11 With regard to the Estates, the Council sent out letters regarding the consultation as detailed below. To summarise, residents were more in favour of refurbishment than regeneration at this stage. It should be noted at this point in the process residents were not in receipt of the offer that would be available from Clarion regarding their properties.

Eastfields - A total of 477 letters were sent out to residents within the estate. The total number of responses received was 101. 36 of respondents were in favour of total regeneration, compared to 2 for partial regeneration, 44 for refurbishment and 8 for other.

High Path - A total of 622 letters were sent out to residents within the estate, as well as the wider area, and the total number of responses received was 123. 35 respondents were in favour of total regeneration compared to 23 for partial regeneration, 42 for refurbishment and 13 for other.

Ravensbury - A total of 207 letters were sent out to residents within the estate. The total number of responses received was 59. 7 respondents were in favour of total regeneration compared to 4 for partial regeneration, 32 for refurbishment and 11 for other.

Draft ELP SA Report, February 2016

- 8.12 Natural England and Historic England did not provide specific comments on the SA report. The Environment Agency provided detailed comments on how the elements of Flood Risk and Biodiversity could be improved. The full response can be found on the Council website.
- 8.13 Responses were also received from the following:
- **Savills on behalf of Clarion** - notes that the draft Strategic Environmental Assessment (SEA), which underpins the Plan does not consider the three options for the Estates, being complete regeneration, enhanced refurbishment and Decent Homes Standard refurbishment. The SEA needs to fully consider the alternatives to regeneration and discount them. Other key concerns identified by Clarion, Savills and the design team are summarised as follows:
 1. The draft Estates Local Plan will form part of the development plan and as such it is important to emphasise that any planning application must have regard to the whole development plan, including the London Plan (2015), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. This is an important legislative context that should be included within the DPD.
 2. The draft DPD does not set the context in terms of housing need and delivery. We feel this is an important consideration that should be added.
 3. Each of the sites are large enough to create their own character and therefore, the level of prescriptiveness in the policies is considered to be unnecessary. Flexibility should therefore be built in to the policies to allow each masterplan to develop through a design-led process having regard to creating their own character, whilst being respectful of the surrounding context and amenities where it is necessary.
 4. The DPD is not considered to read consistently as a whole at present as there are conflicts between the draft policies, particularly in relation to the expected density of residential accommodation, which would be heavily constrained by the building heights policies.
 5. The policies are considered too prescriptive and there is limited flexibility built into the policy wording to allow an appropriate design led scheme to develop having regard to the site specific circumstances of the Estates and other material considerations.
 6. High Path is within an Area of Intensification (as set out in The London Plan 2015) which is not acknowledged within the draft Estates Local Plan.
 7. There are inaccuracies and errors within the existing analysis which should be amended to ensure policies are based on correct and consistent analysis.
 8. A second round of consultation on the draft DPD may not be required and the inclusion of this would have a significant impact on the timescales for delivery of the regeneration.
 - **GLA** - The Mayor welcomes Merton's aim to master plan these potential large

development sites through a development plan document (DPD) as recommended by London Plan policy 3.7. However, the policies need to be flexible enough to be implemented over the Plan period. The document provides very limited commentary on the types, nature and tenure of housing that the Council wants to be re-provided. The Council should be satisfied that the parameters, including the height recommendations, do not limit the opportunity to optimise housing delivery across the sites in line with London Plan policies 3.3 and 3.4. In addition, in line with London Plan policy 3.7, on the larger sites higher densities should be encouraged.

For High Path, adjacent to South Wimbledon Station, the document and development parameters should reflect the high accessibility of the site and that South Wimbledon/Colliers Wood is an Intensification Area as set out in Table A1.2 of annex 1 of the London Plan.

The Mayor and TfL will require robust Transport Assessments (TA), Travel Plans and detailed Construction Management Plans to be prepared as part of future planning submissions in accordance with TfL's Transport Assessment Best Practice Guidance. Increased density at all three estates will increase pressure on existing public transport routes, therefore mitigation towards additional capacity on public transport services may be sought from future development.

- **National Grid** - no comment
- **Sport England** - recommends that reference is made within the Plan to Sport England's three objectives in its involvement in planning matters;
 1. To prevent the loss of sports facilities and land along with access to natural resources used for sport.
 2. To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.
 3. To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

- **The Estates**

With regard to the Estates the Council sent out letters regarding the consultation as detailed below. To summarise, residents were more in favour of regeneration than refurbishment at this stage. It should be noted that residents were now in receipt of the offer that would be available from Clarion regarding their properties.

Eastfields - A total of 465 letters were sent out to residents within the estate. The total number of responses received was 86. 55 of respondents were in favour of total regeneration, compared to 1 for partial regeneration, 20 for refurbishment and 10 no response.

High Path - A total of 608 letters were sent out to residents within the estate, as well as the wider area, and the total number of responses received was 106. 47 respondents were in favour of total regeneration compared to 25 for partial regeneration, 29 for refurbishment and 5 no response.

Ravensbury - A total of 192 letters were sent out to residents within the estate. The total number of responses received was 113. 10 respondents were in favour of total regeneration compared to 14 for partial regeneration, 86 for refurbishment and 3 no response.

[Submission Draft SA Report, November 2016](#)

- 8.14 As a consequence of the representations received to the Draft ELP, February 2016 the London Borough of Merton commissioned Jam Consult Ltd in August 2016 to undertake a review of the SA process in support of the ELP. The review of the sustainability appraisals and supporting documents identified some defects in the SA process, which needed to be corrected if the ELP was to be considered sound when subjected to Examination in Public (EiP).

8.15 In particular, the review found the assessment of options for each of the estates should be revisited in respect of the representations received. The Submission Draft SA was therefore prepared to enable greater clarity to be provided on the reasons for the selection and rejection of alternatives. It was also recognised that the results of the assessment could be strengthened, by providing greater links to the supporting evidence and a more detailed commentary to support the results. The assessment of options and policies was also reviewed and a further assessment carried out. Other amendments included updates to the Baseline Data, additions to the Plans, Programmes and Policies and consideration of the issues identified when undertaking the assessment.

8.16 270 responses were received from 41 respondents. A summary of the responses can be found at [Appendix A10](#) of the SA report and the full responses on the Council's website <http://www.merton.gov.uk/estatesplan>. Key issues that were raised from the organisations that responded were as follows:

Environment Agency (EA) -

Having been involved in the previous consultations, the EA is satisfied that most of their comments have been incorporated in Merton's Estates Local Plan pre-submission publication. Overall the publication appears to be founded on a robust and credible evidence base. The EA notes that the findings of the Sustainability Appraisal have been reflected in the document and used to inform the policies.

Further detailed comments on the specific measures that should be considered with regard to Flood risk in the detailed design of the proposals and potential mitigation measures are given in relation to each of the estates.

Natural England -

The Sustainability Appraisal (SA) has been used to help ensure that there are realistic choices made during the process which enable redevelopment to go ahead while still achieving gains for the environment which are key to combating climate change and improving the health and wellbeing of those living in London, where air quality is an issue. The options chosen give a good account of the reasons why and allow for a wide scope of improvements to the biodiversity on site across the three sites, with links to green corridors possible as well as green or brown roof spaces a possible feature. Overall, Natural England believes that provided the above elements are taken forward and there is a tangible improvement seen at the three estates as a result of redevelopment work, then the environment will see benefits in the long term locally and more widely within London.

GLA -

The Local Plan is supported in principle and conforms with the London Plan in aiming to bring forward the redevelopment of existing municipal housing and the delivery of new housing

within the Merton Housing Zones. In particular the Local Plan aims to provide significant additional housing through making efficient use of land, in line with policies in Chapter 3 of the London Plan.

The Local Plan makes clear that the redevelopment will include the protection of open space. This is welcomed and in line with London Plan 7:18, and is an important element in providing a high quality environment for future residents. However, there does not appear to be an indication of the quantum of new development or even a range of new and re-provided homes for each of the three sites. Such a figure or range will be important to help set the context for most readers.

Consideration should be given to the Mayor's Draft Affordable Housing and Viability Supplementary Planning Guidance and Local Planning Authorities are strongly encouraged to follow the approach set out in the SPG.

Metropolitan Police Service-

By the inclusion of Secured by Design principles and standards within the regeneration of the estates the cumulative impact for all three estates would be positive in relation to crime. The design and layout of the estates should provide well-defined routes with spaces and entrances promoting convenient movement without compromising security so improve access and movement.

Savills on behalf of Clarion

The Council's support for regeneration and intensification of the estates as set out in the Draft Local Plan and for the broad changes and alterations made since the Stage 2 Consultation are welcomed. The increased flexibility in the draft ELP since the Stage 2 Consultation, is also welcomed. However, there remain a few policies, which are considered overly prescriptive. Any planning application for the regeneration of the Estates would have to be determined in accordance with the whole development plan, and not just the policies within the ELP. The ELP should not therefore be applied mechanistically without regard to other Development Plan policies, and this could be made clearer within the DPD wording.

Sport England

Concern is raised regarding the need to plan for new sports and recreation facilities and the requirement for a robust evidence base to be used in the development of policies.

Ravensbury Residents' Housing Associations

In the Stage 3 report, it appears that very little attention has been paid to certain aspects of the residents Stage 2 responses. The residents would like the Planning Inspector to request copies of all of the Stage 2 responses in order to independently ascertain to what extent the residents own views have been overruled by the council officers own personal viewpoints, which lack proper professional substantiation relative to the actual experience of living in

Ravensbury the residents themselves. Detailed comments on the specific policies were also provided, which are set out in [Appendix A10](#) and the Statement of Consultation.

High Path Community Association

Open space within the plans show little in the way for current provision and residents are concerned about the resulting impact on provision from the proposed increased in density (608 homes to 1,600 homes). A request is also made for the incorporation of sustainable materials in the detailed designs.

Other

Several comments were also received from individual residents of the three estates, which can be viewed in the Council's Statement of Consultation.

Submission Version SA Report, March 2017

- 8.17 No specific concerns were raised regarding the SA at this stage or within the Examination in Public.

Main Modifications SA Report, September 2017

- 8.18 Minor comments were raised in one representation in relation to the impact upon the environment. Suitable mitigation measures will be identified through the application of the development plan policies in the detailed design stage to address any impacts, as explained within the SA report and technical appendices. The Inspector also made minor amendments to the modifications but none of these were considered significant or to alter the content of the modifications or sustainability appraisal, as published for consultation.

The Statement of Consultation and the full representations can be found on the Council's website <http://www.merton.gov.uk/estatesplan>

9 Reasons for Choosing the Plan and Alternatives

Options Considered

- 9.1 A number of alternatives were considered in the preparation of the ELP, with regard to the regeneration of the Estates. The options considered included:
- Issues and Options Sept 2014 - options for the redevelopment or refurbishment of the estates, including the type of housing and facilities that were required for each estate.
 - The Case for Regeneration (CfR) prepared by Savills, Sept 2015 (updated October 2016) - set out the different issues and options considered for the estates, which were used as the basis for the SA.
 - Draft Estates Local Plan, Feb 2016 - the proposed policies for the plan.

Case for Regeneration

- 9.2 As part of the commitment to improving the quality of accommodation to Decent Homes Standards, Clarion has undertaken technical surveys and financial planning work towards achieving this commitment since 2010. In Clarion's view, this work has indicated that significant refurbishment; maintenance work and financial investment would be required to the housing stock to achieve the required standard.
- 9.3 Clarion has advised that residents of Eastfields, High Path and Ravensbury have provided information about the problems with their homes and outside spaces, which include: homes that are expensive to heat; leaking roofs; poor noise insulation; condensation and damp; issues with refuse collection; and unsafe pathways. Some of these issues were also raised by residents during the Council's consultation in the autumn of 2014 and 2016, particularly concerns around unsafe pathways, damp and poor internal conditions.
- 9.4 Having undertaken an exploration of reasonable options Clarion has decided that regeneration is the most cost effective way of delivering longer term sustainable decent homes, through the provision of new, well-designed, energy-efficient homes that will meet the needs of residents now and in the future.
- 9.5 For Eastfields and High Path, Clarion propose regeneration of the whole estates and for Ravensbury, a mixture of partial regeneration refurbishment and retention. It is the Council's view, supported by Clarion's evidence that whilst incremental refurbishment and Decent Homes works would improve the internal housing quality in the short to medium term, regeneration provides an opportunity to deliver comparatively more significant positive changes to the three neighbourhoods and a once in a generation opportunity to improve the quality of life for current and future residents.
- 9.6 Regeneration will be expected to provide a range of choices and benefits including high quality well designed neighbourhoods, wider housing mix, more private space for residents,

better quality green spaces and community facilities and job creation opportunities. It will also be an opportunity to provide much needed new homes by making more efficient use of brownfield land, improving the quantity, quality and mix of new homes on each of the three estates.

- 9.7 A key expectation of any regeneration proposals that come forward will be a commitment to keeping the existing community together in each neighbourhood, and for existing residents to have a guaranteed right to return to a new home in their regenerated neighbourhood.

The Draft Submission Estates Local Plan, 2016

- 9.8 As a result of the representations received the Council commissioned Jam Consult Ltd to review the SA work undertaken to date in relation to the ELP, with specific attention to the selection of options. The review of the sustainability appraisals and supporting documents found there were some defects in the SA process, which needed to be corrected if the evidence base for the ELP was to be considered suitably robust when subjected to Examination in Public (EiP).
- 9.9 In particular, the review found the assessment of options should be revisited in respect of the representations received, with specific reference to the reasons for the selection and rejection of the 'reasonable alternatives' and the assessment of the likely significant impacts.

Selection and Rejection of ELP Options

- 9.10 The option of 'do nothing' or 'no plan' was considered but rejected for all the estates. Aside from Clarion's commitments to improving the quality of life of its tenants, under the provision of the Stock Transfer Agreement with the Council, Clarion is legally bound to refurbish the condition of the existing stock as a minimum. As a consequence, the option to 'do nothing' was not considered a reasonable alternative and was not considered further.
- 9.11 The following Options were considered in the Case for Regeneration prepared by Savills, September 2015 (updated October 2016), which were then assessed in the SA.

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

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

- **Option 3 – Full Redevelopment (Eastfields and High Path)**

Demolition of all existing properties on the Estates and redevelopment of the sites to deliver new modern, energy efficient and high quality homes (up to 700 on Eastfields and 1,400 on High Path), alongside a new community space, open space, landscaping and car parking.

- **Option 3 – Partial Redevelopment (Ravensbury)**

Refurbish existing properties owned and managed by Clarion within Ravensbury Court and Hengelo Gardens to an enhanced standard, as described above, and redevelop the remainder of the Estate to deliver up to 230 new modern, energy efficient and high quality homes, alongside a new community space, open space, landscaping and car parking.

Rejection of Partial Redevelopment of Eastfields and High Path Estates

- 9.12 Following the Issues and Option consultation, Clarion concluded that partial regeneration was not a viable proposal for either the High Path or Eastfields estates. The reason for this decision was because the estates cannot be divided easily into separate areas to be redeveloped and refurbished in the same way that is possible at the Ravensbury Estate. This issue is most obvious at Eastfields, where the estate's construction as a continuous perimeter block does not allow for its partial redevelopment.
- 9.13 With regard to High Path, the urban design and layout of the estate does not lend itself to partial regeneration. For example, the worst performing homes are considered to be the three twelve storey blocks, which house 198 homes and comprise almost a third of the estate. The blocks occupy a very small site area, which would provide a very small footprint available for redevelopment, constraining the scope for increased density and improvements to the urban design across the estate.
- 9.14 Partial redevelopment of the High Path and Eastfields estates would not offer the best opportunity to deliver a high quality residential development that optimises the use of the land to deliver a high quality residential development.

Rejection of Full Redevelopment of Ravensbury Estate

- 9.15 Clarion considered the potential for full regeneration of the Ravensbury estate; however, this was not considered to be a reasonable alternative and therefore it has not been taken forward for the reasons explained below.
- 9.16 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, Clarion faces difficulties in obtaining securitisation on such properties.
- 9.17 As a result of the initial work conducted by Clarion to identify which estates within their Merton portfolio 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

Hengelo 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 Hengelo Gardens unaffected from a structural and physical point of view.

9.18 Furthermore, the western portion of the Estate comprises predominantly tenanted properties in Clarion 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.

9.19 Full regeneration of the estate would also 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.

9.20 The SA assessed the three options identified in the Case for Regeneration. As a consequence **Options 1 and 2 Refurbishment** were rejected for each of the estates.

Reasons for Rejection

9.21 The current condition of the stock is significantly below Building Regulations and Decent Home Standards. Whilst there is likely to be a minor positive impact in the short term, the improvements will not enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term. The refurbishment would involve significant cost in the short term to bring the properties up to the appropriate standard, however the benefits would only be of short-term benefit. Significant further investment would be required in the longer term to maintain the properties at a liveable standard.

9.22 External works, such as new cladding and roofs are proposed to the existing buildings in Option 2, which should improve the surface treatment of the buildings appearance, however, does not enable the structure or open space to be improved or redesigned. The improvement works may have a minor negative impact in the short term for noise, however suitable mitigation measures such as hours of work should minimise likely disruption. Positive impacts may be achievable in terms of economic growth and employment but the level of impact is uncertain at this stage.

9.23 The refurbishment of the current homes does not enable the use of the land to be optimised to provide an increase in the quantity of accommodation on the Estate to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable housing. The impact is therefore expected to increase over time as the pressure for housing increases.

9.24 Financial modelling has been carried out over a 50year period. The refurbishment would involve significant cost in the short term to bring the properties up to the appropriate standard, however the benefits would only be of short-term benefit. Significant further investment would be required in the longer term to maintain the properties at a liveable standard.

Reasons for Selection

Option 3: Full Redevelopment Eastfields and High Path and Partial redevelopment of Ravensbury were selected

EASTFIELDS AND HIGH PATH

Positive Impacts:

- 9.25 The redevelopment of the estate will enable the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.
- 9.26 The Geotechnical and Geo-environmental Study identifies that there is moderate likelihood for contamination within the estate, to be expected with brownfield land, it does not identify any factors that should prevent the potential for redevelopment or onerous cost implications.
- 9.27 The redevelopment offers the opportunity to improve the quality of provision and enhance the biodiversity of the site and surrounding area through measures such as green corridors, ecological enhancement and the use of green/brown roofs. The mature trees should be protected where possible.

9.28 The redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need and overcrowding. The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.

Uncertain Impacts:

- 9.29 The site is predominantly Flood Zone 1 (less than 0.1% annual probability) with part of the western end of the site is Flood Zone 2 (0.1-1% annual probability) and is considered to have a low likelihood of flooding. However, historic surface water flooding has occurred in and around the estate. The introduction of SuDS will help mitigate against surface water flooding and alleviate flows to the existing sewer network, which is at capacity. Any development will be subject to a Sequential Test, Exceptions Test and site specific FRA in accordance with the NPPF, which must have regard to Merton's Strategic Flood Risk Assessment and Surface Water Management Plan.
- 9.30 The redevelopment will enable water saving measures to be incorporated into the new accommodation to meet best practice standards and for water meters to be installed. The need for additional sewerage capacity will need to be considered to address the increase in population.
- 9.31 Merton is an AQMA. The redevelopment may result in adverse impacts as a result of demolition, construction and an increase in traffic. An Air Quality Impact Assessment will be required as part of any future planning application to ensure suitable mitigation measures have been identified. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term. The redevelopment may have an adverse impact in the short to medium term during construction, however suitable mitigation measures, such as hours of work, should minimise likely disruption.
- 9.32 The estate currently has a PTAL rating of between 4 (good) and 6a (very good) and is well located strategically with strong links to tube, train and bus services, as well as the potential extension of the tram in the future. The estate performs well internally for pedestrians but has few good logical connections to the wider strategic network. The redevelopment offers the opportunity for improving the integration and connectivity of pedestrian routes to the wider area, particularly facilities, through the redesign of the internal spatial structure. Increased density will increase pressure on existing public transport provision and will need to be

assessed. The improvements to connectivity will also need to be considered further in the detailed design and TA.

9.33 There are several listed buildings within close proximity to the site and it is within an Archaeological Priority Area. Development will need to make sure that it does not have an adverse impact upon the assets or their settings.

9.34 The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents. An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in the current structure. The opportunity for a new layout that the redevelopment provides should ensure that accessibility to and within the site is improved. The site is relatively well served by social infrastructure including schools, health, leisure and community facilities and a new secondary school is also proposed adjacent to the estate. An assessment of the impact of the increase in population upon the existing facilities will be required as part of the design process.

- 9.35 Financial modelling has been carried out over a 50 year period. The redevelopment would involve a greater level of up-front cost than options 1 and 2 but would deliver the greatest regeneration benefits that would last for the long term. The current modelling shows that this option is the most economic and deliverable. Further work on the modelling is on-going, including the potential to incorporate units for private occupation to enhance the overall viability.
- 9.36 A detailed phasing and decanting plan will also need to be developed. A garage site on the site offers the opportunity to build new housing, which could provide Phase 1 of the redevelopment and the opportunity for decanting of existing residents. Further information on the phasing and decanting will need to be considered as it becomes available.

Negative Impacts

- 9.37 Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
- 9.38 The current condition of the stock is significantly below Building Regulations and Decent Home Standards. The redevelopment of the estate will enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties.
- 9.39 The redevelopment will result in waste in the demolition, construction and operation of the development. Waste minimisation plans will need to be put in place that encourage the recycling or reuse of materials in construction, the selection of sustainable materials and the design of suitable recycling and waste storage systems for the operation of the development.

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Positive impacts:

- 9.40 The partial redevelopment of the estate enables the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment would make more efficient use of the land, as well as offering the replacement of the Orlit Homes, which are of a defective type of construction. The partial redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.
- 9.41 The Geotechnical and Geo-environmental Study identifies that there is moderate likelihood for contamination within the estate, to be expected with brownfield land, it does not identify any factors that should prevent the potential for redevelopment or onerous cost implications. The redevelopment offers the opportunity to improve the quality of provision and enhance the

biodiversity of the site and surrounding area through measures such as green corridors, ecological enhancement and the use of green/brown roofs. The mature trees should be protected where possible.

- 9.42 The partial redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need and overcrowding. The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.

Uncertain Impacts:

- 9.43 The site is mainly in Flood Zone 2 with some areas of Flood Zones 3a and 3b and is in the functional floodplain of the River Wandle, although there is no recorded history of the site being flooded. The partial redevelopment would result in a higher concentration of dwellings in the functional floodplain. However, the site is already developed for residential use and new development would offer the potential to incorporate mitigation measures such as setting accommodation at 300mm above the relevant 1% annual probability flooding event (including climate change allowance). A SuDS strategy would also need to be developed to provide on site attenuation and manage surface water runoff. Any development will be subject to a Sequential Test and Exceptions Test and site specific FRA in accordance with the NPPF, which must have regard to Merton's Strategic Flood Risk Assessment and Surface Water Management Plan.
- 9.44 The redevelopment will enable water saving measures to be incorporated into the new accommodation to meet best practice standards and for water meters to be installed. The need for additional sewerage capacity will need to be considered to address the increase in population.
- 9.45 Merton is an AQMA. The redevelopment may result in adverse impacts as a result of demolition, construction and an increase in traffic. An Air Quality Impact Assessment will be required as part of any future planning application to ensure suitable mitigation measures have been identified. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term. The redevelopment may have an adverse impact in the short to medium term during construction, however suitable mitigation measures, such as hours of work, should minimise likely disruption.
- 9.46 There are several listed buildings within close proximity to the site and it is within an Archaeological Priority Area. Development will need to make sure that it does not have an adverse impact upon the assets or their settings. The site is also in the Wandle Conservation Area.
- 9.47 The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents. An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in the current structure. The opportunity for a new layout that the redevelopment provides should ensure that accessibility to and within the site is improved. The site is relatively well served by social infrastructure including schools, health, leisure and community facilities. An assessment of the impact of the increase in population upon the existing facilities will be required as part of the design process.

- 9.48 Financial modelling has been carried out over a 50 year period. The redevelopment would involve a greater level of up-front cost than options 1 and 2 but would deliver the greatest regeneration benefits that would last for the long term. The current modelling shows that this option is the most economic and deliverable. Further work on the modelling is on-going, including the potential to incorporate units for private occupation to enhance the overall viability.
- 9.49 A detailed phasing and decanting plan will also need to be developed. A garage site on the site offers the opportunity to build new housing, which could provide Phase 1 of the redevelopment and the opportunity for decanting of existing residents. Further information on the phasing and decanting will need to be considered as it becomes available.

Negative Impacts:

- 9.50 Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified. The current condition of the stock is significantly below Building Regulations and Decent Home Standards. The redevelopment of the estate will enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties.
- 9.51 The estate currently has a PTAL rating of between 2-3 (poor) and is a relatively isolated location. The estate is bounded by; the river, parks and railway line, providing the feeling of a segregated enclave and reliance on the private car. Potential for significant improvements to connectivity are relatively limited and will need to be considered further in the detailed design and TA. The redevelopment offers the opportunity to improve accessibility to the wider area as well as the internal layout, which will need to be considered further in the proposals.
- 9.52 The redevelopment will increase waste in the demolition, construction and operation of the development. Waste minimisation plans will need to be put in place that encourage the recycling or reuse of materials in construction, the selection of sustainable materials and the design of suitable recycling and waste storage systems for the operation of the development.

Summary Results of Options

Sustainability Objectives		ESTATES LOCAL PLAN OPTIONS								
		EO1	EO2	EO3	HP1	HP2	HP3	RO1	RO2	RO3
SO1	LAND USE	Orange	Orange	Green	Orange	Orange	Green	Orange	Orange	Green
SO2	CLIMATE CHANGE	Orange	Green	Orange	Orange	Green	Orange	Green	Orange	Green
SO3	WATER QUALITY	Grey	Grey	Yellow	Grey	Grey	Yellow	Grey	Grey	Yellow
SO4	WATER RESOURCES	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Yellow
SO5	SOIL & LAND QUALITY	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Green
SO6	AIR QUALITY	Grey	Grey	Yellow	Grey	Grey	Yellow	Grey	Grey	Yellow
SO7	NOISE	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
SO8	TRANSPORT	Grey	Grey	Orange	Grey	Grey	Yellow	Grey	Grey	Orange
SO9	FLOOD RISK	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Yellow
SO10	BIODIVERSITY	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Green
SO11	BUILT ENVIRONMENT	Grey	Yellow	Green	Grey	Yellow	Green	Grey	Yellow	Green
SO12	HISTORIC ENVIRONMENT	Grey	Grey	Grey	Grey	Grey	Yellow	Grey	Grey	Yellow
SO13	ENERGY & CARBON	Orange	Green	Green	Orange	Orange	Green	Orange	Orange	Green
SO14	OPEN SPACE	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Green
SO15	WASTE	Grey	Grey	Orange	Grey	Grey	Orange	Grey	Grey	Orange
SO16	HOUSING	Orange	Orange	Green	Orange	Orange	Green	Orange	Orange	Green
SO17	ACCESS TO ACTIVITIES	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Yellow
SO18	SOCIAL DEPRIVATION	Green	Green	Green	Green	Green	Green	Green	Green	Green
SO19	HEALTH & WELLBEING	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Yellow
SO20	DIVERSITY & EQUALITY	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Green
SO21	SERVICES & FACILITIES	Grey	Grey	Yellow	Grey	Grey	Yellow	Grey	Grey	Yellow
SO22	CRIME	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Green
SO23	EDUCATION & SKILLS	Grey	Grey	Green	Grey	Grey	Green	Grey	Grey	Green
SO24	ECONOMIC GROWTH	Yellow	Yellow	Green	Yellow	Yellow	Green	Yellow	Yellow	Green
SO25	EMPLOYMENT	Yellow	Yellow	Green	Yellow	Yellow	Green	Yellow	Yellow	Green
SO26	VIABILITY/ DELIVERABILITY	Orange	Orange	Yellow	Orange	Orange	Yellow	Orange	Orange	Yellow

Key

	Major negative impact
	Minor negative impact
	Uncertain impact
	Minor positive impact
	Major positive impact
	No significant impact

Summary of Findings

- 9.53 The assessment of the Options has shown for all the estates that whilst Options 1 and 2 would improve the quality of the housing stock, it would not enable the use of the land to be optimised to provide an increase in the quantity of accommodation on the Estates to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable housing.
- 9.54 Furthermore, the refurbishment would involve significant costs in the short term to bring the properties up to the appropriate standard, however the benefits would only be of short-term benefit. Significant further investment would be required in the longer term to maintain the properties at a liveable standard.
- 9.55 **Option 1: Refurbishment to Decent Homes (Merton Standard) and Option 2: Refurbishment to Enhanced Standard are therefore not considered to be suitable options for the regeneration of the estates.**
- 9.56 Option 3 would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need and overcrowding. The redevelopment/partial redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development. The redevelopment also provides opportunities for the layout, urban design and landscape of the areas to be improved, including accessibility to the surrounding area and facilities.
- 9.57 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 Clarion 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.
- 9.58 The regeneration of the Estates over the 50 year life cycle would deliver the greatest regeneration benefits having regard to Clarion'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.
- 9.59 Furthermore, Clarion 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 enhance the overall viability and this will continue.

- 9.60 Greater clarity will be needed on the viability and deliverability of the proposals, and the phasing and decanting proposals. Proposals will need to be drawn up which minimise the disruption to existing residents as far as possible. Further work will also be needed to examine the specific issues that relate to each estate in order to determine how they can be addressed in the design proposals to achieve sustainable development.

10 Monitoring

- 10.1 The Plans, Programmes and Policies as well as the Baseline Data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work that will be undertaken as part of the planning applications for development. Specific attention should be given to the uncertain impacts identified when reviewing proposals.
- 10.2 The specific mitigation measures will also need to be provided in more detail at the planning application stage to ensure that any adverse impacts are suitably addressed. Monitoring of the impacts will be addressed through the Authority's Monitoring Report, produced annually. A detailed phasing and decanting plan will also be required to ensure disruption to residents is minimised as far as possible.
- 10.3 A high-level viability assessment of the Estates Local Plan was undertaken by BBP Regeneration in March 2017 to verify the current development assumptions. The report concluded that the Plan is considered to meet the NPPF test that the cumulative impact of the standards and policies should not put implementation of the plan at serious risk. The report acknowledges that planning obligations relating to affordable housing and other mitigation measures will need to be considered on a case-by-case basis; it has not considered the viability of specific proposals for development.
- 10.4 The financial modelling work for the regeneration is on-going. The current development assumptions will be subject to review as planning applications are prepared. Further detail is still required on some elements, e.g. the costs of demolition and the Community Infrastructure Levy. Discussions are also on-going regarding the estimates of sales prices, phasing of sales and early discounting, sales rates and rental income, all of which may be affected by post-referendum uncertainty.
- 10.5 There are also risks largely outside the Borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.
- 10.6 The National Planning Practice Guidance (NPPG) states that local planning authorities should not need to undertake comprehensive assessment exercises more frequently than every five years although they should be updated regularly, looking at the short-term changes in housing and economic market conditions. Merton will be monitoring this Plan against the same indicators in Merton's Local Plan and the SA Framework and will report and publish by way of the annual Authority Monitoring Report, which is available on Merton's website each year.

Assessment of delivery of the Plan will also be monitored to determine if any intervening action needs to be taken to achieve the identified goals within the Plan.