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Estate Regeneration National Strategy : Good Practice :Guide Part 1, DCLG December 2016

"Involvement of Community": remains unclear mostly with respect to Clarion Displays where lack of qualified consultants to discuss in detail specifics have been the frustration of presentations made (see evidence 006EP – P Modasia for the typical attitude of Clarion).

Overall the remaining documents on the Estates Plan Website are a little confusing – I have attempted to be concise and relevant to where changes appear to have been made.

The report from Environment Agency is of interest and due weight in the plan should be given to it.

JAM 223 Page Appendix – still relies on summaries from others that do not match the detail in the reports those others have actually provided

Impact on Land – Particular Ravensbury – Accepted impact on European Sites is minimal, if any, the wildlife of particular Ravensbury Park and Morden Hall Park appear negatively impacted, and nothing in the plan appears to enhance the two areas particularly with reference to the Wandle Trail Aspirations.

B. High Path New London Vernacular

The creation of a new neighbourhood with traditional streets and improved links to its surroundings, that supports the existing local economy while drawing on the surrounding area's diverse heritage and strong sense of community.

- This appears to be a good aspiration, I hope it can be achieved to some degree, without indeed being slavish and just one single building style for high path (as appears indicated in the colour photo sections of final submission plan)

Buildings will be of a high quality internally and externally, have a consistency in design with a strongly urban form and character, optimising the most efficient use of land that makes the most of the excellent public good transport services, and access to quality amenity space.

Indeed the quality must be demonstrably higher quality in and out.

EP H2 appears still mildly inconsistent with EP H1

EP H2 c ' Compliments An Historic Street Pattern' (As Fact Hayward Close completed approx 1980 in its present format , prior to 1953 it was a stub cul-de-sac for predominantly industrial access from High Path toward (unnamed) Nelson Grove Road.

EP H2e Merantun High Street ?? Appears Incorrect naming , what road is meant here?

EP H3d It Should be Noted that the wall in Station Road is considered to form part of the Historic Boundary of Merton Priory, Merton Council will need imagination in how this aspiration should be implemented.

EP H7 Existing Trees, should be made clear that this is in consultation with Merton Tree Officers, some mature 50+ years trees appear omitted from existing diagrams.

EP H7g I would suggest that planting should promote native species and wildlife where not adverse to human health.

EP H8a I Disagree With Heights higher than Merton High Street where fronting Merton High Street (Reason Sunlight Blocking particularly in Winter to the North (and South) pavement areas of Merton High Street. Policy should be 'appropriate heights and 'having due consideration to; (noted this is stated in EP H8b need consistency if possible in the policy wording.

EP H8c now appears inconsistent with EP H1

Analysis to S01 commenter appears hopeful and not following from the actual EP8 detail as such,.

TO S012 To EP H8 appears inconsistent with the Planning Permission already granted for Phase 1a area not in the EP area, and is inconsistent with Clarion Proposals for buildings adjoining Phase 1a and in respect of High Path potentially inconsistent with any proposal to a school to the south thereof ?

S013 measures : CO2 assessments fail to analyze embedded CO2 in existing buildings,

EP H4 Summary States 'The redevelopment of the site provides the opportunity to provide a greater number of houses ' My understanding is that Clarion Plans are to reduce the number of houses compared to existing count , replacing some house footprints with flats from stock acquired by Clarion in the open market..

A176 Equalities Assessment : For High Path, it is hardly surprising if one builds homes for disabled / older persons (Will Miles Court) and restrict the access to social housing in particular to younger, in work groups, that the populations will be skewed as the percentages show, This 'negative' is a much one of policy and has no meaning in how the residents actually feel about themselves, nor that those existing populations will feel any better in replacement homes.

A184 Still Repeats incorrect analysis of the housing 'defects' which does not follow the actual surveys and reports provided in detail.

A185 Land Assembly 'equalities impact assessment in its own right' While this is noted, as long as the internal layouts of new properties are demonstrably better or as good as existing in the appropriate access areas then this should not be needed, but no person should be deprived of their land without compensation and recognition that at least equal value of size and access and usability be retained particularly after effects of traffic on locations are understood. Despite

Promise that 'The new home will be at least as large as the home it replaces' this has not been demonstrated in dimensioned comparisons of each existing and proposed housing type, including external space and the inclusive or separately rented garages which are just as much part of a resident's occupied space and used as their domicile or home-business.

'Every Replacement Home will be at least as large as the home it replaces' This must be interpreted as no less running wall or window space as existing occupancy and include all outbuilding , etc.

'Sustainability Appraisal, September 2017 1709/129/Merton_SVELP_SA_Main Mods jam consult ltd page 31 :- My comment would be that the reading of the existing buildings along Merton High Street and Morden Road in the Plan area could be completely different to that rendered here. This appears to be a conclusion seeking a justification for proposals that the actual external buildings do not in their varied read.

The article still states 'reintroduce' traditional street patterns, when the 1832 through to 1952 layout was essentially the N-S Pincott Road with a part E-W Nelson Grove Road with cul-de-sacs off High Path, Nelson Grove Road and Pincott Road, essentially punctuating the 68foot Gardens of most of the smaller terraced and detached houses along the roads (eg extant Rodney Place) or infill development around detached cottages along Morden Road. Terraces and similar formed the west side of Abbey Lane (Abbey Road now) with Reform Place (1832) forming the alignment of present day Hilborough Close. Essentially the area has never had a Grid Pattern that the later main development of the Battles area had , mainly due to the retention of some farmed land to the north of High Path (formerly Church Path) until the after the Battles area had been developed. This history is un-noted although easy to determine from maps, census and land records. For note the south side of Merton High Street had a mix of retail, wholesale, light industrial and similar activities, similar in part to the present East side of Merton Road. Notwithstanding such error in analysis of the past, the objectives for High Path seem to be of sufficient range to allow a number of differing interpretations, limited as I have noted above, which could be a positive – although the residents of the existing houses on the estate may have significant mis-givings as to what is proposed for them, as do the residents of quality existing flats being asked to make-way for some of those house dwellers and such flat dwellers being re-homed into inferior in style and outlook location than their existing.

'Building For Life' 24 Page Document. Generally gives good advice, unclear if all pictured examples are for best practice or what not to do. 'Varying the density, built form and appearance or style of development' Is a key for both Eastfields potential and interpretation for High Path.

Main Modifications Schedule Comments

EP H1 Townscape 3.132

The quality of Morden Road should be improved by enabling the creation of a consistent street width with parallel building lines, tree planting and appropriate building heights either side of the street

It remains questionable that building a tunnel effect is desirable, the present set-back and skew

of the road helps to prevent Morden Road wandering into being a speedway route.

EP H2b General grammar St John's the Divine Church, is actually St John The Divine (known as St John's) Such carelessness smacks of lack of knowledge of the area.

EP H2 3.140 [Protecting Character and Improving Access) are nearly mutually exclusive.

EP H3 3.147 agreed, 3.145 *still does not demonstrate how movement within estate can enhance movement around the estate.(for Merton Abbey School access for example) 3.152agreed*

HP H7 *Agreed with provision that all trees are assessed correctly within the estate. Some appear omitted on the mapping,*

EP H8 Building Height Para E and New Paragraph (Para E? Page 53) appear contradictory.

Glossy Forward Etc of Plan, Page 6.

The comments of better built and sustainable are subjective and despite the plan are not wholly founded in fact when supporting documentation is viewed.

Vision- not shared by many residents in High Path and fewer still in Ravensbury

Strategy – Founded on good practice if this were a build on newly available land, less so on land where adequate or better housing exists

Urban Design Principles. Likewise, and issues of Morden Road and Mereatun Way referenced but not really resolved.

Page 14 *Ironic Picture of former Mitcham Fire Station, now under development considerations.*

Page 16 2.20 *Appears contradictory to the Financial Assessment indications elsewhere in the suite of documents.*

Page 16 2.18 *Mayors' Targets amended, but possible Morden area residential development will meet this, and if so will Tube use render enhanced residential numbers at South Wimbledon unable to travel comfortably at peak times without CR2 being more than a thought away?*

Page 18 2.26 *Is there any evidence that reducing inequalities increases "social cohesion" in England's Cities ?*

Page 23 *Map Red Line in Abbey Road appears incorrect around bin stores and sub-station, map omits one new build block of flats in Abbey Road*

Page 90 Para 3.106 *Factually Incorrect , Merton Evangelical (Baptist) Church in Rodney Place/Nelson Grove Road was built as purpose built in the 1930s (I have news cuttings of this and the involvement of (Sir) Cyril Black in this , and extended southwards into its former garden space in the late 1970s*

Page 103 3.121 *subjective*

Page 104 3.124 *see my previous comments*

3.125 *Inconsistency /Consistency is subjective, today seems to work well enough, a changed environment wont of itself make a better view or create an enhanced community.*

3.128 *Still unclear who, and how this aspiration will function with the other desire for building sizes on Morden Road and the historic wall along Station Road.*

Page 105 3.129 *Council may have an aspiration but it is not shared for the A24 by Tf:L*

Page 111 3.145 *This extension south of Abbey Road could need the demolition of Brook Farm House, historic building coming up to 95 years old and not achieve the desire given that the closest part of the estate plan area is existing Lovell House.*

3.145 *Parking Problems for Residents appear to be contradictory to Verbal Evidence from Paul*

Quinn on sufficient parking space for residents on residential parking provision (note this may be because of Clarion viewing estate as a whole, not the different characteristics of the East and West sides of Pincott Road.

3.150 CPZs have been rejected previously by residents. Estate roads are managed by Clarion, adoption of new roads needs to be made clear at planning permission stage?

3.165 Local Character ? Or other items note area has scope for its own character (influence of Rodney Place excepted?)

Page 215 A3.24 Actually overlaying the sale particulars of the 1820s map with the present day OS map gives a rough indication that Merton Place (Moat Farm) probably covered the area part under present Merton Place and gardens to the east side of Doel Close.

Page 216 A3.25 I think the Tower Blocks are Cast-In-Situ not prefabricated – see local press reports from neighbours in Pincott Road on construction of May Court.

Page 218 Historical Context Ravensbury. For Clarity Ravensbury Lane forming historic route to Morden makes sense when one realises that Morden was effectively the area around Morden Parish Church and The George Inn , rather than was going to be called 'North Morden' at the tube station.

OVERALL CONCLUSIONS

The plan is much improved from first ideas, but still for High Path particularity retains inconsistencies and it is difficult to see how any desirability of street network within High Path actually enhances links to elsewhere other than eliminating a few paths to nowhere – which can be modified without an official plan anyway.. A fine line between an enhancement and over-development and lack of architectural respect in particular to South Wimbledon Tube overall must be the overarching consideration, along with ensuring no loss of space for existing residents.

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