

SD.6a Schedule of representations received to pre submission publication (stage 3) of Merton's Estates Local Plan December 2016 - February 2017 including officer responses

Alphabetical order by representor

Reference	Consultation's Responder	Estate	Comment	Policy Area	Policy	Officer Response
073001UR	Acquah F	All three	In regards to the Pre-Submission Estates Local Plan, I have had a look through and I'm fairly pleased with it.	General	N/A	Noted.
074001UR	Acquah F	All three	Although my only concerns are the sizes of the rooms as I am assuming that they will be quite small as your aim is to build more houses?. Nevertheless the plan seems fine.	Design	Planning Application	Noted with thanks. All development proposals will need to adhere to relevant Development Plan requirements including those concerning room sizes e.g. as set out in the Mayor's London Plan (Table 3.3 Minimum space standards for new dwellings) and also the Mayor's Housing SPG.
076005HP	Andrews D and Macara M	High Path	We write with reference to pdf document '16-12-05-High-Path-boards_final-exhibition' we provide the following questions and considerations of the proposed redevelopment of the High Path Estate. We understand that the new population is 1600 people, please could you provide information on the current population and therefore	Clarion Housing Group	Clarion Housing Group	Clarion Housing Group response "There are 608 existing homes on the High Path Estate. The Socio-Economic Analysis confirms that according to GLA population estimates, there are 1,700 people in the immediate area of High Path."
077005HP	Andrews D and Macara M	High Path	Please could the council advise how future additional nursery, primary and secondary school provision will be met? Both primary and secondary provisions in the area have been extended to cope with the current population.	Other	N/A	Noted. The council, as the Local Education Authority, monitors school intake annually and plans for the future. Current projections indicate that Merton has adequate primary school places for the next five years but requires secondary school places. In addition to the expansion of other Merton secondary schools, the proposed new secondary school, Harris Academy Wimbledon, may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan.
078005HP	Andrews D and Macara M	High Path	We would like assurances from the council that all public services would cope with an increase in population.	Other	N/A	Noted. The Estates Local Plan helps the council plan for population increases. Merton Partnership (the council, NHS, Fire service, Police and other public sector and voluntary bodies) work together on the Community Plan and other proactive planning for population change and service provision. This includes healthcare and schools provision.
079005HP	Andrews D and Macara M	High Path	Have TFL been consulted and confirmed additional tube services, especially during peak hours?	Transport	Movement and Access H3	Noted. Tfl has been consulted from the outset and raised no concerns regarding underground capacity.
080005HP	Andrews D and Macara M	High Path	Please could the council advise on how future additional Doctors GP provision will be met?	Other	N/A	Noted. Policy H4 Land use supports commercial and community floorspace within a regenerated High Path. Although the NHS has not currently highlighted the need for new GP premises in this area, should premises be needed, these could be delivered within a regenerated High Path.
081005HP	Andrews D and Macara M	High Path	We assume that Traffic Impact Studies have been carried out and the proposals have no negative impact on the current traffic?	Transport	Planning Application	Noted. In addition to the Estates Local Plan, at the planning application stage any significant new development is expected to prepare a detailed transport assessment to assess potential impacts, including recommendation as to how these might be managed. This typically includes consideration of other significant development nearby.
082005HP	Andrews D and Macara M	High Path	What is the split between social housing, PRS and private ownership?	Clarion Housing Group	Clarion Housing Group	There are 609 homes on High Path. 60% are owned by Clarion Housing Group, an affordable housing provider. The remaining approx 200 homes are privately owned and of these approximately 50% (100) are rented out by their landlords. The number of homes privately rented out can change at any time as it up to the landlord whether they they choose to occupy the home or rent it.
083005HP	Andrews D and Macara M	High Path	Are all existing High Path residents, in both private ownership and social housing, offered the opportunity to move back to high path with the same housing offer as their existing properties or better and at no additional cost?	Clarion Housing Group	Clarion Housing Group	Clarion Housing Group response "The Residents Offer has been a separate process and does not form part of the Estates Local Plan. All existing residents have been offered the opportunity to move back to High Path at no additional cost."
084005HP	Andrews D and Macara M	High Path	What percentage of existing High Path residents are in favour of the proposed development?	general	Clarion Housing Group	For the council's consultations, more respondents favoured whole or partial regeneration than bringing existing homes up to Decent Homes standard. Clarion Housing Group response "The research was conducted as a face-to-face, telephone and online self-completion survey consisting of one open and 15 closed questions. The fieldwork was carried out between 1st July and 29th July 2015 and a 52.5% response rate was achieved with 634 responses collected across Eastfields, High Path and Ravensbury"
085005HP	Andrews D and Macara M	High Path	What assurances can be provided that large volumes of people living in such a dense community will be satisfied with their built and social environment?	Other	N/A	Noted. In addition to the Estates Local Plan, The council will consult with residents and stakeholders on all submitted development proposals. Any planning decisions will take account of any responses received from that consultation.
086005HP	Andrews D and Macara M	High Path	The CGIs should genuinely show the intended construction materials and architectural details. The use of lower quality, cheaper materials should not be permitted.	Design	N/A	Noted with thanks. As there are no CGI's in the Estates Local Plan, we undertand that these comments related to Clarion Housing Group proposals and we will pass this is for the planning applcaiton stage we will pass this on to Clarion Housing Group.
087005HP	Andrews D and Macara M	High Path	Please could you advise on what the mechanism is for answering our questions? With regard to the drawings represented in the proposals we provide the following pros and cons: Pros • Coherent street layout responding to the existing street pattern; • The principal of taller development to the rear of the tube station is appropriate, but general concerns over the overall height shown in the development; • Seemingly good provision of public realm; • CGIs at end of doc titled 'Nelson's Yard', 'Mansion Blocks', 'St. John's Mews' suggest properties will be masonry constructed with good quality brick and precast elements with attention to detail. The Council and the developer need to ensure that the quality suggested in the CGI's is upheld and not diluted into cheaper options such as characterless polymer modified renders	Design/Transport	Clarion Housing Group	Noted. This representation relates to Clarion Housing Group's proposals.
088005HP	Andrews D and Macara M	High Path	Cons: • The scheme is too dense, overdeveloped and out of scale with the context; • All properties surrounding the proposals are primarily 2 – 3 stories; • 6 stories onto the Merton High Street is twice the height of the existing properties on the north side of the road. The proposed new properties will tower above the existing on the opposite side of the road; • We suspect that in winter the large areas of the Merton High Street will be in shadow cast by the 6 story properties on the south side of the road; • The majority of outer London high streets are characterised by properties of a maximum height of 3 stories such as the existing context. 6 stories is not only out of character of the context it is out of character to the city.	Design	Building Heights H8	Noted. Policy EP.H8 Building Heights sets out that applicants must consider the sclae of building relates well to the building heights on the north side of Merton High Street.
089005HP	Andrews D and Macara M	High Path	• Existing schools are already strained and there is no provision for addition school places in the proposals	Other	Planning Application	Noted. The council, as the Local Education Authority, monitors school intake annually and plans for the future. Current projections indicate that Merton has adequate primary school places for the next five years but requires secondary school places. In addition to the expansion of other Merton secondary schools, the proposed new secondary school, Harris Academy Wimbledon, may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan.

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090005HP	Andrews D and Macara M	High Path	• The proposal appears to indicate an increase in the housing density which would mean increased congestion in the area and an increase in the pollution. Merton High Street, and the surrounding areas are already very polluted, anything that will increase the congestion must be avoided. The housing density must be decreased	Design	Planning Application	Noted. National Policy and London wide policy requires land to be used efficiently, especially where there is good supporting infrastructure such as transport links. The High Path area has an excellent access to public transport and other facilities and can support more homes. London has an overwhelming need for new homes. Reducing the number of new homes compared to the existing would deprive existing residents as well as new households of a home.
016010EP	Anonymous	Eastfields	Dear Sir/Madam I received your letter dated 8th December 2016. Thank you very much. I welcome your plan to rebuild and improve Eastfields, High Path and Ravensbury estates. It is appreciateable by all Merton council householder. Thank you. Yours faithfully.	General	N/A	Noted.
075012HP	Baskaran S	All Three	My name is S Baskaran I would like to inform you that we are happy with the estate plan.	General	N/A	Noted with thanks.
029006HP	Betancourt E	All Three	Good afternoon. I would like to be informed about the submission to the Secretary of state.	N/A	N/A	N/A
220004EP	Bigmore G	Eastfields	I don't think for one moment my opinion means anything to anyone involved in the above. I now realise that despite a lot of hard work on behalf of the residents/tenants we were on to a loser right from the beginning with the council coming at us from one side and Circle	General	N/A	Noted
221004EP	Bigmore G	Eastfields	As for building a road leading to Grove Road I think it won't be long before there are serious accidents as it so close to the bend.	Transport	Movement and Access E3	Noted. This section of the public highway is not within the Estates Local Plan area
021002UR	Buckman I	All three	Thank you for your letter of 16th January regarding the Merton's "Pre-submission Estates Local Plan". I have no particular comments or views to make.	General	N/A	Noted.
022002UR	Buckman I	All three	However, I would be grateful if you could keep me informed about the submission to the Secretary of State, the publication of the independent planning inspector's report and when Merton Estates Local Plan is adopted.	General	N/A	Noted.
069001HP	Carr A	High Path	In regards to the High Path estate proposals. my main concerns are : increase in general road traffic - Abbey Road is a rat run in itself, often clogged up or with speeding cars. With a proposed secondary school and increasing accommodation numbers locally, are there any contingencies in place. I am a Croft road resident and cars will bomb down this street, Mill road, Dane Road, Meadow road when they come up against queues on Abbey Road or Merton High Street. Many residential streets are dead ended locally and I don't understand why some streets both off Merton High Street and Colliers Wood are prioritised for such a feature over others. can you explain this to me.	Transport	Movement and Access H3	Noted. The Council has previously promoted traffic management measures in and around High Path to mitigate through movements. However, these were reject by residents during the statutory consultation process.
070001HP	Carr A	High Path	You mention you want to avoid rat- runs through the estate so maybe this whole area , south of Merton High Street, north of Momentum way, East of Morden road could be devoid of rat-run opportunities. so only residents would need to access the area and keep the Mementum way access for the schools, church, Eddie Catz and High Path, Station Road Business units.	Transport	Movement and Access H3	Noted. In addition to the work carried out for the Estates Local Plan, any major new development is expected to prepare a detailed transport assessment to evaluate potential impacts and provide recommendation as to how these might be managed/mitigated. This review typically includes consideration of other significant planned development nearby.
071001HP	Carr A	High Path	I imagine making Abbey Road straight would increase traffic and speed - so we would need efficient speed control furniture put in place - what is in place now doesn't work assides from the narrow entrance at the South end of the road and the immediate left turn into High Path at the South end.	Transport	Movement and Access H3	Noted. Any major new development is expected to prepare a detailed transport assessment to evaluate potential impacts and provide recommendation as to how these might be managed/mitigated. This review typically includes consideration of other significant planned development nearby. Traffic calming and management measures can change over time to take account of the views of local residents and changes in traffic movements.
072001HP	Carr A	High Path	Building work , noise and dust pollution for all local residents and local schools. Can you give me an indication what disturbance I and my neighbours are likely to endure. I am led to believe the actual building work could go on for over a decade. What timeline do you have ? it's a great concern for people living on the estate as well.	Clarion Housing Group	Clarion Housing Group	Clarion Housing Group response " <i>The phasing of the development is still to be determined, but will be derived following consideration of the decant of existing residents and construction logistics. It is expected that the build period at High Path will extend to c.15 years. The potential for construction impacts will be carefully considered as part of planning applications that are submitted, and the Council will use this assessment process and where necessary</i>
222007HP	Cohen E	High Path	There is much in the Estates Local Plan (High Path) to commend it.	General	N/A	Noted with thanks.
223007HP	Cohen E	High Path	I would like to make the following comments:- There is a grave danger of turning the High Path Estate and south Wimbledon into an inner city enclave instead of an integral part of the wonderful borough of Merton - by increasing the density dramatically and allowing tall buildings to be developed. This will totally spoil the character and feel of the area as well as having a grave impact on services and	Design	Building Heights H8	Noted Policy EP H8 sets out policy for general building height and specific character areas. " <i>Redevelopment of the estate must create a consistent character that fits in harmoniously with the surrounding development....taller buildings may be considered appropriate to facilitate intensified use of the site. Such buildings must be located in appropriately and relate well to the surrounding context and public particularly at street level.</i> " The overall vision for the High
224007HP	Cohen E	High Path	The recent survey regarding Wimbledon town centre identified that people do not want tall buildings. This applies to the areas outside the town centre as well as within the town centre.	Design	Building Heights H8	Noted. This plan deals with building heights specific to its local context. The guidance on building heights is appropriately based on this, rather than the opinion of people in another, albeit nearby, part of the borough being consulted on a different piece of guidance

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225007HP	Cohen E	High Path	There was little in the Estates Local Plan regarding the internal living space. For example, no mention was made * that all rooms should have windows * that there should be sufficient family/communal rooms within a family dwelling so that there is space for different activities to be carried out at the same time, for example children have a quiet space for doing homework and not just one room serving as kitchen, dining room and living room. * that new homes will have at least as much space as existing homes and with an appropriate layout providing sufficient space within different room types.	Design	Planning Application	Noted. Matters of internal layout are detailed matters which will be appropriately addressed at the planning application stage to ensure development proposals are in accordance with the Statutory Development Plan which includes requirements on internal layouts (e.g. London Plan Table 3.3. minimum space standards for new dwellings, London Housing SPG).
226007HP	Cohen E	High Path	The Estates Local Plan does not take into account the proposed new school on High Path - The Harris Academy Wimbledon.	Other	Planning Application	Noted. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan.
227007HP	Cohen E	High Path	The following are my comments on specific sections of the document:- 2.44 p 37 - Defensible space - I welcome the statement that all perimeter blocks should have active frontages with well designed appropriate defensible space. I would like to suggest, from the perspective of a pedestrian, that the most pleasant defensible space in front of buildings such as flats, houses and office blocks, are those that have railings or a wall to waist height with greenery between the building and the boundary, the greenery thus visible from the street. In addition, if the boundary is defined by a wall, greenery on top of the wall can be an attractive feature if it is well maintained. The use of the railings or wall gives a feeling that the building is not encroaching on the pavement whilst requiring very little distance to separate the building from the street.	Design	Townscape H1	Noted. The materials approach to defensible space will be assessed by the Council at planning application at which point we would welcome comments.
228007HP	Cohen E	High Path	2.47 p 37 - Promoting sustainable development - does this take into account the carbon emissions etc of the building materials, machinery, equipment etc used in the construction as well as the carbon footprint of the finished buildings over the years of usage? If not, it should do so. There is no point in having a low carbon footprint building if it has used many times the carbon to build.	Environment	Environmental Protection H6	Although planing policies, including the London Plan and E6/H6/R6 re CO2 emissions require use to be calculated; not full embodied carbon through out the development lifecycle, Merton's policies EP. E6 / H6 and R6 (h(v)) recognises the issue raised in this response and states ... <i>All new development proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure and sustainable procurement of materials"</i>
229007HP	Cohen E	High Path	p 88 - The current site analysis might be correct at this time, however, with the proposed new school to be built on High Path in the very near future, this needs to be taken into account in the site analysis.	Design	Planning Application	Noted. The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan. Such proposals for a school will be required to comply with the Statutory Development Plan.
230007HP	Cohen E	High Path	p 101 Issues Summary 3.116 - I see no problem with green space fronting onto Merton High Street - it gives an aspect of open-ness and relaxation rather than frenetic and hemmed in.	Environment	Open Space H5	Noted with thanks
231007HP	Cohen E	High Path	3.117 - Morden Road has not been enhanced by developments such as the grossly unattractive Spur House especially at ground level. It is not appropriate for the council to make comments regarding the lack of cohesion in this road when they have allowed developments such as Spur House to take place.	Design	Planning Application	Noted. Planning permission for Spur House was refused at Merton's Planning Application Committee; the applicant appealed the refusal and the appeal was allowed against the council's wishes.
232007HP	Cohen E	High Path	3.119 - Whilst I acknowledge that the estate is badly designed in terms of buildings and space and that it has a high PTAL rating, this does not automatically mean that the area can sustain a huge increase in density on the estate and the surrounding area, where much development is also taking place. The local transport links can only support a finite number of people, ditto other services. Is enough being done to ensure, for example (amongst other amenities and services), sufficient sewage waste extraction and medical facilities.	Transport	Movement and Access H3	Noted. Regarding transport, the council is worling with Clarion HOusing Group and Transport for London on transport and travel issues around High Path for the Estates Local Plan. In addition, at the planning application stage major new development is expected to prepare a detailed transport assessment to evaluate potential impacts and provide recommendation as to how these might be managed/mitigated. This review typically includes consideration of other significant planned development nearby such as nearby schools, bus, tram and tube capacity. The utilities companies have also been invited to respond to the Estates Local Plan and would continue to be involved throughout the development to assess water and wastewater capacity. A health impact assessment has been carried out for the Estates Local Plan which considers, amongst other things, health services locally.
233007HP	Cohen E	High Path	p 102 Opportunities Summary 3.123 - Whilst Morden Road is perceived as a wide road, there is a danger the buildings will be too high and too close to the pavement (ie without defensible space) changing the aspect from a wide road to a hemmed in, over-shadowed road. This 'wide road' has nothing like the width of the roads say in Vauxhall where tall buildings do not give a feeling of imposition to the pedestrian or road user.	Design	Street Network H2	Policy EP H8 sets out policy for building heights in relation to specific character areas such as Morden Road which is addressed by EP H8 c). This should be read in conjunction with further guidance para. 3.205 which aims to ensure height to street porpotions result in a positive pedestrian environment.
234007HP	Cohen E	High Path	3.128 - Whilst creating views to Merton Abbey Mills is a commendable intention, Merton Abbey Mills itself has been grossly neglected over very, very many years and has none of the vibrancy it originally had. Unless Merton Abbey Mills is to be fully utilised as a key asset to the vicinity, there seems little point in providing views. However, providing views to the Wandle and green area alongside is well worthwhile.	Design	Townscape H1	Noted. One of the urban design principles is to highlight positive local context. 2.51 states " <i>Opportunity must be taken to strenghten local character by drawing on its positive characteriestics"</i>
235007HP	Cohen E	High Path	3.129 - I welcome the suggestion that the estate should be designed to guide future developments outside the estate. Currently, there seems to have been no thought given to integrating developments with the surrounding area - Spur House being a typical example.	Design	Townscape H1	Noted. The Council's design aspiration is to sucessfully integrate developments into their surroundings. Please see Policy EP H8 C) which refers specifically to the character of Morden Road and the need to development a consistent building height taking cues from emerging buildings. Planning permission for Spur House was refused at Merton's Planning Application Committee; the applicant appealed the refusal and the appeal was allowed against the council's wishes.
236007HP	Cohen E	High Path	p 104 - Site Specific Policies EP H1 d) A focal point or space to highlight the area's links with Lord Nelson needs to be carefully thought out so as to be recognised as such and not thought of as a waste of space or a lost opportunity.	Design	Townscape H1	Noted. Policy EP. H1 <i>Townscape</i> (d) states " <i>A focal point or space must be provided that highlights the significance of the area's local history particularly its connection to Lord Nelson.As there will be many ways of delivering this and it should complement the buildings and spaces around it, t he detailed design of space / focal point will be assessed at planning application stage at which time we welcome further comments.</i>
237007HP	Cohen E	High Path	3.132 - Morden Road - Do not make the buildings too high as is the current policy. The road might be deemed wide enough but in reality tall buildings will result in a feeling of domination and being hemmed in and overlooked.	Design	Building Heights H8	Policy EP H8 sets out policy for building heights in relation to specific character areas such as Morden Road which is addressed by EP H8 c). This should be read in conjunction with further guidance para. 3.205 which aims to ensure height to street porpotions do not result in poor pedestrian environment.
238007HP	Cohen E	High Path	p 106 - EP H2 Street Network 3.141 - Any links with Rodney Place should only be made with the approval of the existing residents/property owners in Rodney Place. p 107 - H2 Street Network map North-South future extensions into Merantun Way will not be possible with the development of the proposed new secondary school on High Path (Harris Academy Wimbledon). I think it is also fair to make the assumption that future extensions cannot pass through the existing primary school and it's land. It is misleading to show these suggested extensions on the map.	Transport	Street Network H2	Noted. As stated in Para 3.141. linking Rodney Place into the street pattern " <i>should be explored"</i> . In addition to the consultation carried out on the Estates Local Plan, greater or closer links should be explored as part of the application consultation process. As set out in the key to the map (page 106) for H2 <i>Street Network</i> , e xtensions into Merantun Way are labeled as " <i>North south future extensions to Merantun Way (illustrative integration into street pattern)"</i> Barriers or buildings should not be built within the Estates Plan area that would prevent integration in the future.

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239007HP	Cohen E	High Path	p 108 - EP H3 Movement and Access 3.147 - The development of the proposed new school is a redevelopment of the land between High Path and Merantun Way - presumably this will include the redesign of Merantun Way into a boulevard? and will presumably be discussed with TFL (3.148) ?	Transport	Movement and Access H3	Noted. Transport for London have responded to the Estates Local Plan consultations and are working with Clarion Housing Group on their initial proposals. Transport for London would also be involved in any pre-planning or planning applications for new schools or other major development.
240007HP	Cohen E	High Path	p 126 - EP H8 Building Heights It is disappointing that the maximum building heights are not specified in the document. c) Morden Road - the document states that taller buildings are more appropriate along Morden Road and the heights should be guided by the newer developments springing up along Morden Road. These developments do not necessarily have the backing of residents and locals. The appallingly unattractive and indeed ugly buildings that are being developed with inappropriate heights - ie far too tall - are not a basis on which to guide the development of the High Path Estate on Morden Road. To create a boulevard feel it is not necessary to have extremely tall buildings. e) Any development along the north side of High Path must enhance the feeling of safety walking along the street at night. I do not think these buildings should be taller than the mews streets within the estate. f) Merantun Way - As I understand it, the south side of this road is currently industrial usage and likely to remain so? This is another street that will not benefit from tall buildings.	Design	Building Heights H8	Noted. c) Policy EP H8 sets out policy for building heights in relation to specific character areas such as Morden Road which is addressed by EP H8 c). This should be read in conjunction with further guidance para. 3.205 which aims to ensure height to street proportions do not result in poor pedestrian environment. e)The urban design principles for the estate includes the aim that new development have permeable, legible and accessible layout, as such streets should connect easily to surroundings and be easy to navigate and look like they lead somewhere. Streets must be safe and the buildings should include an active frontage which states that new development must be designed to have buildings with entrances and windows facing the street. This creates a good level of natural surveillance to deter criminal activity. The layout of public space and the interface between the building and the public space creates safer environments, these principles can be successfully integrated into neighbourhoods with taller buildings. f) Noted.
241007HP	Cohen E	High Path	p 129 - Indicative Street Sections - I am a puzzled by the diagrammatic representations of a high street (eg Merton High Street), an urban boulevard (eg Morden Road) and a wider boulevard (eg Merantun Way). Currently there is insufficient width on all of these roads to accommodate 4 lanes of traffic or 4 lanes of traffic plus cycle lanes and footpaths. I cannot imagine how these roads will be widened sufficiently along their whole length to accommodate the additional lanes of traffic, cycles and pavements. I therefore have to assume these illustrations are not accurate and are misleading. In addition, the illustration of the urban boulevard in comparison with the high street shows just how inappropriately tall the buildings along the boulevard are.	Design	Street Network H2	The diagrams are based on existing street widths, or in the case of Merantun Way, the potential for a more fundamental transformation of its character from urban motorway to urban street. The Merton High Street diagram shows existing single carriageway with parking either side, segregated cycle lane and existing tree planting on south side. Building heights are indicative and not necessarily to scale. Para. 4.16 on p178 gives guidance on ensuring the ratio of building height to street width is appropriate.
242007HP	Cohen E	High Path	4.4 - P176 - I am not sure if this paragraph leads on to point 4.5 and the following points or if there is some text missing... "Notwithstanding the requirements of the council's validation checklist the applicant will be required to provide information to address the following:" There is nothing following this paragraph except the subsequent sections.	General	N/A	Noted. The paragraph leads to paragraph 4.5 at the top of the next column, first heading "architecture and elevations"
243007HP	Cohen E	High Path	4.5 - P176 - I am concerned that there is a danger the idea that different phases of development have their own character may in itself lead to a mismatch in design rather than mitigate the concern over monotony.	Design	N/A	Noted. The design requirement 4.6 P.176 goes on to state that architectural approach requires setting out some common characteristics and this could be in the form of a more formal design code.
244007HP	Cohen E	High Path	4.7 - P176 - The materials should be in keeping with the existing local area. For example, in general brickwork of the buildings in the surrounding area tends to be London yellow stock, multicolour or red brick. Some buildings may be discoloured due to pollution through the years from coal fires and soot to modern day traffic pollution. Care should be taken to not assume dark bricks were originally dark bricks and thus lead to the use of inappropriate or out of context building materials.	Design	Planning Application	Noted One of the urban design principles of the Estates Local Plan paragraph 2.51 is for the design and appearance of new development to take inspiration and ideas from the positive elements of the local built, natural and historic context. The design requirement in paragraph 4.7 states the need to use materials complementary to their context. The detailed material palette will be assessed through the planning application process at which time we will welcome comments.
245007HP	Cohen E	High Path	4.16 - P178 - Ensure that street furniture does not hinder the path of pedestrians especially, for example, people pushing buggies, pulling shopping trolleys or mobility scooters.	Design	Planning Application	Noted. para 4.16 deals with this but can be amended to better reflect this point. Minor modification 34 proposed to Design requirements for planning applications, para 4.16 Page 178 "A palette of surface materials and street furniture should be developed <i>that is well considered and well laid out to minimise street clutter</i> , and includes as well as landscaping guidance . Noted with thanks.
096000EA	Environment Agency	All three	Thank you for consulting the Environment Agency on the above. Having been involved in the previous consultations, we are satisfied that most of our comments have been incorporated in the Merton's Estates Local Plan pre-submission publication. Overall the pre-submission publication appears to be founded on robust and credible evidence base. The Environment Agency notes that the findings of the Sustainability Appraisal have been reflected in the document and used to inform the policies.	Environment	Environmental Protection E6 H6 R6	Noted with thanks.
097000EA	Environment Agency	Ravensbury	The proximity of the Ravensbury Estate to the river Wandle and Ravensbury Park mean that there are good opportunities to restore the river Wandle through the park or undertake enhancements to improve the condition of the river as part of major redevelopment adjacent to it. Currently, the river is impounded and subject to a number of problems such as midges which have been problematic on a yearly basis. Redevelopment of the area provides an opportunity to improve the park and consider river restoration and enhancement to create a better functioning river and river corridor. This is recognised on paragraph 3.282, which we welcome.	Environment	Environmental Protection R6	Noted. Sections 3.281 and 3.282 of the Estates Local Plan encourages the opportunity to undertake in channel and river bank enhancements to the River Wandle. When considering applications for development these considerations will be taken into account and the Environment Agency would be consulted as this would be subject to a Environment Agency Flood Defence Consent. Any application to undertake works would have to comply with the most up to date legislation.
097100EA	Environment Agency	All three	It is clear that flood risk is a consideration that has been taken into account in the preparation of the plan. We certainly welcome that the preferred options for the redevelopment of the estates are seeking to ensure that flood risk elsewhere is not increased, ways to reduced flood risk are being sought and any opportunities to make space for water are being considered.	Environment	Environmental Protection E6 H6 R6	Noted with thanks.
097200EA	Environment Agency	Eastfields	Eastfields: This area is situated within Flood Zone 1. However, the need to ensure surface water runoff is suitably managed to allow for the runoff rates that are compliant with guidance and policy is noted, as are the references to the inclusion of SUDS. The suggestion of opening up a currently culverted watercourse on the eastern boundary of the site should be investigated further as part of the overall redevelopment. The opening up of a currently culverted watercourse could assist in managing flood risk at the site, as well as providing habitat and other biodiversity benefits. Since we last made comment on the Estates Plan, the legislation for permitting works on watercourses has changed. Flood Defence Consents have been superseded by Flood Risk Activity Permits and now fall under the Environmental Permitting Regulations. Prior permission is still required for works in, over or under a main river or within 8m of the top of the riverbank. We have attached more detailed comments below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.	Environment	Environmental Protection E6	Noted. Opportunities for enhancements of the culverted watercourse will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.
098000EA	Environment Agency	All three	Since we last made comment on the Estates Plan, the legislation for permitting works on watercourses has changed. Flood Defence Consents have been superseded by Flood Risk Activity Permits and now fall under the Environmental Permitting Regulations. Prior permission is still required for works in, over or under a main river or within 8m of the top of the riverbank. We have attached more detailed comments below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.	Environment	Environmental Protection E6 H6 R6	Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.

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099000EA	Environment Agency	High Path	<p>High Path</p> <p>This area is mainly situated within Flood Zone 1, though a part of the site is located within Flood Zone 2. The opportunity to increase the density of housing within a low fluvial flood risk area has been highlighted in the Plan. The recognition of needing to ensure surface water runoff is suitably managed to allow for the runoff rates that are compliant with guidance and policy is noted, as are the references to the inclusion of SUDS.</p> <p>The Bunces Ditch, a designated main river, runs along the edge of or just within the boundary of the overall site. We note that comment is made regarding further investigations into the origin and route of this watercourse, as the exact line of a culverted watercourse can be difficult to determine from the surface. If there was an opportunity to open up a culverted watercourse it should be looked into further, as this can help to manage flood risk as well as having a number of biodiversity benefits. If development could be moved away from the watercourse that would also be of benefit in terms of access for maintenance purposes.</p>	Environment	Environmental Protection H6	Noted. Opportunities for culvert enhancements at Bunces Ditch will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.
100000EA	Environment Agency	Ravensbury	<p>Ravensbury</p> <p>The Ravensbury Estate is shown as being located within an area considered to be a high risk to fluvial flooding from the adjacent River Wandle. However the plan recognises that this needs to be effectively managed as part of the redevelopment of the estate. Ravensbury Estate is already developed for residential use and new development would offer the opportunity and potential for mitigation measures to be incorporated into the redevelopment. This would include the raising of the finished floor levels of dwellings to a minimum of 300mm above the 1 in 100 year flood level, taking into account climate change.</p> <p>There would also be the opportunity for flood resistant and resilience in the redevelopment, which is also welcomed. Reference is also made to a SUDS strategy as part of the redevelopment. However, due to the varying levels of flood risk across the Estate, there is a need to carefully consider the sequential and exception tests, as well as the requirement for a site specific flood risk assessments. Adequate provision and consideration needs to be given to the category of development proposed for each area on the Estate and its compliance with the NPPF and the Boroughs own Policy on flooding. The introduction of a greater number of residential dwellings in an area at risk to flooding should be carefully assessed to determine whether it can be considered as appropriate in that location. In addition, any redevelopment proposal should be able to clearly demonstrate that there will be no loss of floodplain storage capacity and ideally, further storage for flood waters should be created.</p> <p>It should also be noted that updated climate change guidance was released earlier this year, and therefore the most up to date information should be taken into account as part of any redevelopment plans. Any development should also take every opportunity to increase both the flood resistance and resilience to buildings and the surrounding environment.</p>	Environment	Environmental Protection R6	Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.
101000EA	Environment Agency	All three	We note that reference is made to the National Planning Policy Framework (NPPF) in relation to flood risk, and that it will be necessary to comply with the Sequential and Exception Tests as appropriate, and also the necessity of producing site specific Flood Risk Assessments to accompany detailed plans for the redevelopment of these areas.	Environment	Environmental Protection E6 H6 R6	Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.
017002EP	Falzon C	Eastfields	Regarding Mitcham Eastfields estates plan. In my view I think the estate should stay the same but make improvements to whats already there, to make better, the front, rear and internal of the properties. this will save a lot of money, better then knocking down peoples homes. That is my view.	General	Townscape E1	Noted.
21200GLA	GLA	All Three	<p>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012 Re: Merton Estates Local Plan Pre-Submission</p> <p>Thank you for consulting the Mayor of London on the Merton Estates local Plan Pre-Submission regarding its general conformity with the London Plan under section 24 (1) (b) of the Planning and compulsory Purchase Act 2004. This letter covers matters from the GLA and TfL.</p>	General	N/A	No comment required
21300GLA	GLA	All Three	General. The Local Plan is supported in principle and confirms 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.	General	N/A	Noted. The Estates Local Plan will form part of the development plan once adopted, and any planning application must have regard to the whole development plan, including the London Plan (2016), the Merton Core Strategy (2011) and Sites and Policies Plan (2014), in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. The Estates Local Plan covers a significant regeneration and investment period of 15 years. It sets out a strategically pitched framework to guide regeneration over the 15 years, with the level of prescription, such as the quantum of housing to be determined at the planning application stage in accordance with relevant planning considerations and requirements set out by the whole development plan.
21400GLA	GLA	All Three	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.	Environment	Open Space E5 H5 R5	Noted with thanks
21500GLA	GLA	All Three	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. The GLA and TfL are aware of the broad quantum envisaged through our involvement with Housing Zones designations but this will not be the case for many others.	General	N/A	The Estates Local Plan covers a significant regeneration and investment period of 15 years. It sets out a strategically pitched framework to guide regeneration over the 15 years, with the level of prescription, such as the quantum of housing to be determined at the planning application stage in accordance with relevant planning considerations and requirements set out by the whole development plan. The Estates Plan Housing Market Assessment (examination library reference SD12) accompanying the Plan sets out potential ranges of the number of homes that could be provided within each estate.

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21600GLA	GLA	All Three	Affordable Housing The Council will be aware that the Mayor has recently consulted on his Affordable Housing and Viability Supplementary Planning Guidance and Local Planning Authorities are strongly encouraged to follow the approach set out in the SPG. While this document is still in draft form, Merton is encouraged to take account of its approach and set a threshold level for viability for schemes coming through the planning system without any public subsidy (see SPG for detailed guidance) and have a clear approach to seeking to increase the amount of affordable housing delivered to 50% using grant (as set out in the recently published Affordable Housing Programme Funding guidance) and other public subsidy. The SPG also offers guidance in relation to Vacant Building Credit.	General	N/A	Noted. Merton Council welcomes and has responded to the consultation on the Mayor's draft Affordable Housing and Viability SPG. In addition, Merton Council is working with the GLA on the Strategic Housing Land Availability Assessment and other housing research to inform the London Plan review. The council is starting its own borough-wide Local Plan which, when adopted in 2019, will replace the borough-wide policies in the Core Planning Strategy and Sites and Policies Plan. The Mayor's approach to affordable housing will be actively considered then. The following amendment are recommended to clarify the policies:- Minor Modification 10 EP.E4 page The land use for the estate will remain predominantly residential with open space provision and with re-provision of <i>the existing number of affordable homes</i> , non-residential uses and designated open space to meet relevant planning policies. Minor Modification 17 EP.H4 (a) page 112 Insert the following The land use for the estate will remain predominantly residential with open space provision and with re-provision <i>of the existing number of affordable homes</i> , non-residential uses and designated open space to meet relevant planning policies. Minor modification 27 Insert the following into Policy EP R4(a) page 160 The predominant land use for this estate is to be retained as residential with the re-provision <i>of the existing number of affordable homes</i> and the existing community room. Minor modification 11 EP.E4 (b) Page 68 Exceeding the current <i>indicated London Plan</i> density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality Minor modification 18 High Path policy HP.H4(b) page 112 Amend as shown Exceeding the current <i>indicated London Plan</i> density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality Minor modification 28 Ravensbury policy HP.R4(b) page 112 Amend as shown Exceeding the current <i>indicated London Plan</i> density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality
21700GLA	GLA	All Three	Detailed Site and Design Policies The Plan includes an appropriate level of detail in relation to landscape and environmental protection, including flood risk and drainage, (which are recognised as significant issues in some locations) for the three housing estates where development will be focused. The Local Plan also contains a range of more detailed points and policies relating to the design and height of buildings within the new developments, these are largely a local matter but are broadly in line with London Plan design policies.	Design	Open Space E5 H5 R5	Noted with thanks
21800GLA	GLA	All Three	Transport Issues TfL welcomes the reference to estate car parking being provided in accordance with London Plan maximum standards and would recommend that reference is also made to cycle parking conforming with London Plan minimum standards. As stated previously, TfL would encourage the estate street networks to accord with TfL's Street Types guidance.	Transport	Movement and Access E3 H3 R3	Agree. Three minor modifications recommended for clarity Minor Modification 09 Eastfields Para 3.16 page 52 Vehicular and cycle parking on the estate Minor modification 16 High Path Policy EP H3 e) <i>Vehicular and cycle parking</i> must ... Minor modification 26 Ravensbury Para 3.260 <i>Vehicular and cycle parking</i> on the estate
21900GLA	GLA	All Three	High Path Page 106 f) "Future extensions of the north-south streets ending at High Path southwards towards to Merantun Way must be a possibility, subject to TfL's support" TfL would recommend that 'must be a possibility' is replaced with 'should be explored'. As stated previously TfL would be unlikely to support additional vehicle access points onto Merantun Way.	Transport	Movement and Access H3	Agreed. Minor modification 13 proposed Policy EP H2 Street Network (f) <i>Future extensions of the north south streets ending at High Path southwards toward to Merantun Way must be a possibility should be explored subject to TfL's support.</i>
25100GLA	GLA	All Three	Page 106 para 3.139 – It is important to reiterate that TfL will not pay for the reconfiguration of the station but should there be other funding mechanism for improvements, TfL would be willing to consider proposals. TfL welcomes reference to the tram extension to South Wimbledon and the requirement for developers to consult TfL on how to integrate the tram extension into development proposals on Morden Road. If you would like to discuss any of the representations in more detail please contact Kevin Reid who will be happy to discuss any of the issues raised.	Transport	Movement and Access H3	Noted with thanks.
252HPCA	High Path Community Association	High Path	The following is a summarisation of comments by the *High Path Community Association's members regarding the document: "Estates' Local Plan Winter 2016/17". 2. Background, Key Drivers, The Case For Regeneration, The Vision, Urban Design Principles It is fair to point out that the residents' views was requested by Circle Housing Merton Priory (CHMP) at regular intervals since the idea of an upgrading of the estate was proposed around 2013. Complaints about the repairs and maintenance programme had reached a tipping point and, as social tenants were voicing comments such as "tear it down", "pull it down and start again", in relation to a quick fix for restoring a well rounded aesthetic pride to the area, we need to note that it was never clear what this work on the estate meant. The latter remark has been a constant theme throughout this entire process and moving forward it is hoped that the Secretary of State and whomsoever is heading up strategic positions for the entire timeline of the estate will bring about an energy to regenerate an area such as those allocated (High Path, Ravensbury and Eastfields) for new works. Pop up exhibitions on the estate were strategically placed and passers by were asked their views as to how they felt about the state of the area. Fast-forwarding to when CHMP's draft masterplan was delivered (late Summer 2014) it had the unfortunate effect of clashing with Merton Council's 'Have Your Say' document. These two major documents which would ask a different set of questions but nevertheless wanted residents opinions on the ideas posed caused much confusion among the majority. As a result residents questioned who was delivering the overall improvement to the area and when one considers that a proportion of residents are still under the misguided impression that Merton Council still own and manage the estate then the general view is of bewilderment, and a overwhelming sense of no control of the entire process. Set within this is the view of the homeowners (leaseholders/freeholders) who have felt detached from the social tenants since the transfer of stock and even alienated despite the fact that they (leaseholders) have paid service charges since the transfer of the land. If this is placed within the context as to why the regeneration was called upon (a general improvement to the internal/external areas of the estate) and as to how this came about (the poor repairs and maintenance programme by Circle Housing Merton Priory and the	General	N/A	Noted
253HPCA	High Path Community Association	High Path	We are minded to note that a regeneration is needed so that those who are living in overcrowded dwellings are rehoused suitably. Also the performance of some buildings, specifically the tower blocks are not in keeping with modern day standards and in some homes, specifically where overcrowding is evident this leads to an extensive build up of condensation and damp which in turn leads to a	Design	N/A	Noted

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2540HPCA	High Path Community Association	High Path	The 'Estates Local Plan' refers to the Equality Act 2010, specifically "2.37.The Equality Act describes a disability as a physical or mental impairment which has a substantial and long-term adverse effect on ones ability to carry out normal day- to- day activities. All development proposals will be expected to have consideration to people with disabilities as de ned bythe Equality Act 2010.This includes physical and mental conditions - for example, dementia."	Other	N/A	Noted.
2550HPCA	High Path Community Association	High Path	We anticipate a wholesale improvement on the woeful promises (eg '91 Promises' and '10 Commitments') made by the resident provider in this regard as it is noted in the draft document of the stock transfer "WOULD MERTON PRIORY HOMES DO ANY WORK IN THE LOCAL COMMUNITY? Yes. Merton Priory Homes would work closely with residents, local councillors and public bodies like social services, education, the police, the health authority, GPs and voluntary agencies to help local communities tackle problems and improve the quality of life for residents. (Consultation on the proposal to transfer Merton Council's homes to Merton Priory Homes - Appendix 3, 2008/9) We have noted that as CHMP have not engaged with Merton NHS CCG as a community partner to the level we deem appropriate for a project of this magnitude, there is a concern on the part of not just the community on the whole and the services we use, if it is assumed a near tripling of the density of the population is to go ahead as preferred that in this context, we have a heightened concern for the increasing population of the elderly and the indigenous vulnerable cohort. Moreover CHMP have sought to remove staff for this particular service last year (June 2016) as it was not considered appropriate or within their remit as a resident provider and this was partly due to their inability to engage with the areas they covered (East and West Merton aka Merton Central). We need also to point out that in view of financial challenges in adult social care and the mitigating financial issues for the NHS in general then a more robust level of discussion needs to be had with the respective agencies related to health and wellbeing in our community.	Clarion Housing Group	N/A	Clarion Housing Group response "CHG has been working with the public health service and regularly meets with statutory and non-statutory service providers across Merton though the Local Strategic Partnership (Merton Partnership). CHG is represented at all levels of the LSP and provides information and briefings to staff and representatives across a range of services. In 2016 CHG worked with LBM's public health services and LBM to draft and submit an NHS Healthy Towns bid for High Path specifically. It is worth noting that given CHG's commitment to rehouse existing residents as early as possible in the regeneration plans, it will be some years before High Path sees any population growth (and resultant increased demand for local services), allowing time for a fuller assessment of future needs closer to the time when they will be actually required.The impact of any redevelopment proposals on health and social infrastructure will be considered when a planning application is submitted. A Health Impact Assessment will need to be submitted with the application. Furthermore, the development would be liable to a Community Infrastructure Levy Payment which the Council could use to fund community infrastructure including healthcare facilities."
2560HPCA	High Path Community Association	High Path	It is difficult to give a fair appraisal of the 'Estate Local Plan's Urban Design Principles as we have been told by architects on the events on numerous occasions that the finer details are yet to come. With that in mind we are concerned as to the general height of the build and most especially the 'right to light' aspect.	Design	Building Heights H8	Noted. Greater details on exactly what the new estate would look like will come at the planning application stage. Planning applications will have to demonstrate
2570HPCA	High Path Community Association	High Path	Open space within the plans show little in the way for what we currently have and if the density is to be propelled forward as intended (608 homes to 1,600 homes) then the whole estate will be making a mad dash to the proposed central park for their uptake of vitamin D.	Environment	Open Space H5	Noted. Policy EP.H5 sets out that development proposals must provide public open space to address the current deficiency in access to Local Open Space found within High Path. It also sets out the requirement for suitably designed playspace, garden space standards; landscaping and other factors.
2580HPCA	High Path Community Association	High Path	As with most new builds the building design is typical of the London vernacular and though we empathise with PRP's desire to have a modern outlook we regard this as an opportunity to harp back to the past and refer to the curves of yesterday for the facades of the buildings instead of the cold, Brutal preference. A way around this would be to work with another company of architects as PRP seem in accordance with this are the materials for the build and given that we are supposedly a long way off we would ask that in the forthcoming workshops the leading designers look to incorporating sustainable materials for the proposed works. We say this because convention says that as this is a multi-million proposal the big companies will utilise the usual mediums to frame our new homes. This is	Design	Planning Application	Noted.
2590HPCA	High Path Community Association	High Path	The raw materials are there and readily available and presently going to waste - residents living in these homes will have lower fuel bills and the surrounding area will benefit with the reduced offset of pollution should we decide to build with such organic materials.	Design	Planning Application	Noted. Determination of materials, will be considered as part of the planning application process.
260HPCA	High Path Community Association	High Path	The raw materials are there and readily available and presently going to waste - residents living in these homes will have lower fuel bills and the surrounding area will benefit with the reduced offset of pollution should we decide to build with such organic materials.	Design	Planning Application	Noted. We would encourage engagement on materials prior to any planning application being submitted and will pass this on to Clarion Housing Group.
2610HPCA	High Path Community Association	High Path	We commend the retaining of mature trees in the area as this not only adds to the 'greenspace' aesthetic but also enhances the clean/environmental buffer for air pollution off the nearby highways.	Environment	Open Space H5	Noted with thanks.
2620HPCA	High Path Community Association	High Path	Last month we formed with other neighbouring resident groups the 'South Wimbledon Enhancement Plan' as the area is not only bereft of a neighbourhood plan but also any localised character. Heritage is important to those that live here and we are disappointed at the rapid advancement of planning for some heinous examples of design in the area. If 'Rose Cottage' in Hamilton Road is to go the way as planned then epic historical draws for outsiders will never happen and so againthis is an opportunity to funnel avenues towards the nearest transport hub or currently quiet Merton Abbey Mills. Containing the estate (as it currently is) and minimising traffic flow will give the new estate a homely feel and residents will havea place of community. The High Street will still act as a fulcrum for those travelling east to west (or vice versa) but the commercial premises must reflect and retain this connection with the estate. The estate is not to be a hub for the masses a la Oxford Street but we are mindful as work is nearing completion on the former Brown & Root building in Colliers Wood and the desire to increase the aesthetics by the SWEP in the area on the whole it would be preferred if ownership of such commercial venues was pitched at independent proprietors. The connectivity to thearea will then ease the transition to Wimbledon's Business Investment District and as Colliers Wood and us are twinned as an area of intensification then the fluidity will be simpler.	Design	N/A	Noted. The council is supportive of this approach and officers and councillors have met with residents in the South Wimbledon area.
2630HPCA	High Path Community Association	High Path	A plan for working with the Council with SWEP can easily be formulated to keep everyone happy and if the opportunity to employ local residents in such establishments was to come about then this would be beneficial all round: residents will have less of a desire to work in 'town' and community spirit will beenhanced. A good example of this connectivity is 'Battersea Square' where residents are forced	General	N/A	Noted. The council is supportive of this approach and officers and councillors have met with residents in the South Wimbledon area.
2640HPCA	High Path Community Association	High Path	Given the fact that Crossrail 2 has not been reignited as a topic for sometime andthe Tram extension to the area has gone quiet too we would say that keepingcertain corridors of access open to change and, flexibility. Locking in plans now willbe difficult to change later and this is very evident in the road en route to Colliers	Transport	Movement and Access E3	Noted. The street network is proposed to better support movement across the estate. The opportunity will be taken to promote the health and community benefits of reducing car travel in favour of walking and cycling. Proposals for a tram stop at South Wimbledon are still at a early feasibility stage and may therefore change; however any proposed development must consult TfL at each stage, in addition to TfL's engagement on the Estates Local Plan. The Council
2650HPCA	High Path Community Association	High Path	Executive summary As a community we endorse a regeneration but this needs to be delivered in amanner that is in keeping with the implicit wishes of the community on the whole. Agood and sound example of this can be found in the paper: Estate RegenerationNational Strategy, December 2016 Department for Communities and LocalGovernment .	General	N/A	Noted.

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2660HPCA	High Path Community Association	High Path	<p>5. Residents' involvement in the management of estates</p> <p>The ongoing management of the estate is vital to its sustainability. Residents should have the opportunity to participate in the ongoing management of the regenerated estate. In some cases this may be through a formal tenant or resident management organisation or through a resident-led board. Ongoing opportunities should be provided for residents to influence decisions and develop the necessary skills to take on more responsibility, if they choose. //Where elected or self-selected residents represent the estate, landlords should provide them with the resources to communicate and engage with all residents to ensure their representative approach is inclusive. This could include a place to meet or computers for preparing and distributing communication materials. //Estate regeneration schemes can play an active role in identifying community facilities which can be owned and managed by resident and community groups. Where community assets are run by the community, people are more likely to have an active and sustainable voice in their neighbourhood. //It is also important to undertake post-occupancy evaluation to understand the impact of regeneration, and to demonstrate an ongoing commitment to residents by acting on the results of any evaluations. This maintains trust with the local community, and encourages social sustainability and community cohesion. //As important as the aforementioned is the need for clear and transparent dialogue between the resident provider, local authority and the residents. In particular is the Council's recent proposal with Harris Academy to build a secondary school on the area of South Wimbledon. We oppose such a venue as not only is it too small to accommodate the needs of its pupils but the proposed regeneration makes no mention of it and all affected stakeholders are wrought with anxiety, exacerbated by the impact of such a venture. Married to this is the large contingent of disadvantaged young people who attend the local primary school that live on the estate and the neighbouring district therein it is folly of the Department of Education and smacks of desperation on the part of the Council to entertain such a proposal. If any of the adjacent stakeholders considered such a proposal it is because they were not aware of the massive undertaking by the resident provider and as such the general conversation was as disjointed as we had previously noted in the consultation back in 2013. The head teacher of the local primary school was unaware of the proposed increase of the density of the estate as was the manager of the Resource centre which houses groups for those with learning difficulties and the resident provider is unaware of the significantly high proportion of</p>	Clarion Housing Group	N/A	<p>Clarion Housing Group response</p> <p><i>"CHG is committed to rehousing existing residents as early as possible in the regeneration plans. It will be some years before High Path sees any population growth (and resultant increased demand for local services), allowing time for a fuller assessment of future needs closer to the time when they will be actually required. The development would be liable to a Community Infrastructure Levy Payment which the Council could use to fund community infrastructure including healthcare facilities. CHG has been working with the public health service and regularly meets with statutory and non-statutory service providers across Merton through the Local Strategic Partnership. CHG is represented at all levels of the LSP and provides information and briefings to staff and representatives across a range of services. In 2016 CHG worked with LBM's public health services and LBM to draft and submit an NHS Healthy Towns bid for specifically focussing on High Path."</i></p>
2670HPCA	High Path Community Association	High Path	<p>EP H6 and h) The feasibility of CHP and district heating must be investigated. As a minimum this should include:</p> <p>(i) An assessment of the secondary heat sources within a 400 metre radius of the site boundary (e.g. river water heat recover from the Wandle; heat extraction from the London Underground).</p> <p>(ii) Evidence to demonstrate ongoing engagement with key stakeholders associated with the potential secondary heat sources such as Transport for London and the Environment Agency feasibility.</p> <p>(iii) Consideration of air quality issues should include an investigation into the potential benefits that a district heat network could deliver to the wider area through the connection to existing buildings or development sites outside of the high path regeneration.</p> <p>(iv) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayors Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites. //**High Path Community Association' is a constitutionalised residents group based on the High Path Estate, South Wimbledon, SW19, which works with the following community partners: (alphabetical order) Baitful Futuh Mosque, Catch 22, Circle Housing Merton Priory, Cooperative Foods, Duke of Edinburgh Awards (Merton), Healthwatch Merton, High Path Resource Centre, Independent Merton Greenspace Forum, Merton CIL, Merton Council, Merton Abbey Primary School ('Governors' and 'Friends'), Merton Heritage Forum, Merton Tenants Residents Federation, Merton Voluntary Service Council, Prostate Cancer UK, Safer Neighbourhood Panel (Abbey ward), St John Divine Church, Sustainable Merton, WIFFA (West Indian Families and Friends), and YMCA.</p> <p>1 regenerate (verb) 1. (of a living organism) regrow (new tissue) //2. bring new and more vigorous life to (an area or institution) (adjective) 1. reborn, especially in a spiritual or moral sense Origin from Latin regeneratus 'create again' // Concise Oxford Dictionary // 2 caretaker (noun) // 1. a person employed to look after a public building derivatives of care - feel concern or interest and take - reach for and hold with one's hands. Carry or bring with one; convey or guide. Concise Oxford Dictionary</p>	Environment	Environmental Protection H6	Noted with thanks.
268000NE	High Path Community Association	All Three	<p>Dear Planning,</p> <p>Many thanks for consulting Natural England Regarding the Estates Local Plan pre-submission version; Apologies for the delay in providing our response.</p> <p>Having taken a look at the documentation submitted it's clear that there is a desire to see the environment take a front and centre role (Policy ELP1) in the life of these estates in future both in terms of improvements on the ground now and also when accounting for climate change in years and decades to come. There is a big benefit to be seen from the proposed use of SuDS within the redevelopment on the three estates as this will help to improve water quality and quantity going into the River Wandle in the long term and also help reduce the surface water flood risks on the sites which are the primary area of concern from future changes to weather patterns from climate change.</p>	Environment	Environmental Protection E6 H6 R6	Noted with thanks.
121011HP	Hobbs R	High Path	<p>It has been considered appropriate for a Secondary school to be located next to the primary school in High Path. I understand that at the moment there are over 400 children in the current primary school and that in excess of 1000 pupils will be accommodated in the proposed Secondary school. My concern is that there is already difficulty for parents to park in the one way High Path both for dropping their children off to attend school and even more so when collecting them when school is over for the day. Has consideration been given to the chaos which will occur when another 1000 children arrive and leave at the same time, some of whom will be dropped off by a parent and some arriving by public transport. I live in The Path and can only imagine the sight of so many children swamping the area both arriving and leaving, plus parents attempting to park at the same time. Nowhere to park - insufficient public transport - safety - the possibility of road rage as a consequence - frustration - 5 days each week. Am I alone in worrying about the inevitable chaos? The mind boggles and I would like to receive your alternative view, if you have one, as an attempt to put mine and I'm sure many other minds at rest.</p>	Transport	Planning Application	Noted. The existing primary school at Merton Abbey has a school travel plan and traffic management in the area assists with managing arrivals and departures. Should a new secondary school be built at High Path, measures could be put in place via the planning application to ensure that traffic and travel measures would not significantly harm local residents and others in the area. These include restricting pcar parking and drop offs, staggered arrival times for children or between schools, traffic management measures installed prior to any school opening.

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Reference	Consultation's Responder	Estate	Comment	Policy Area	Policy	Officer Response
032016HP	How SA	High Path	Dear Future Merton Team and Secretary of State (Environment). I would be pleased to take this opportunity to put forward my comments, based on my unique experience of life here on High Path Estate, where I've resided since 1973. I would say that it is the variety and character of the buildings that give this area a quality which the residents, especially the younger folk benefit from in their individual approaches to everyday living. This is a precious gift and should be maintained, for future generations; therefore the best way forward is to demolish the three ugly high rise blocks, to build, as proposed on the area behind the Old Lamp Works, and to house families in available houses elsewhere, in Merton, leaving new flats on the estate for use of single people, or older couples on their own. I suggest Lovell House is left alone, as this suits families.	Design	N/A	Noted with thanks.
033016HP	How SA	High Path	As for the older flats, they were built to last, and will continue to provide solid weatherproof homes for at least another ¼ century, so why demolish.	Design	N/A	Noted. Clarion Housing Group have undertaken research, which supports the case that Decent Homes can be more sustainably achieved via regeneration which will help create new well designed high quality neighbourhoods aimed at fundamentally improving the quality of lives of existing and future generations living in the area.
034016HP	How SA	High Path	The playground and football pitch are excellent and they are, and I would say you might easily re-surface the public paths and roads through the estate, leaving precious trees alone.	Environment	N/A	Noted. Maintenance of public paths and roads is outside the remit of the Estates Local Plan.
035016HP	How SA	High Path	Sheds and garages could be removed!	Design	N/A	Noted.
036016HP	How SA	High Path	Across the road, there are blocks which could be improved on but basically are sound, because they offer privacy and more sheltered outlooks than the proposed new flats. I would be surprised to hear of many people wishing to leave – especially Merton Place which looks eastward, offering a historic perspective rather than the plans which Circle housing heave put on the table, which are quite frankly boring, dully and soul-less, and biased toward ethnicity.	Design	N/A	Noted.
037016HP	How SA	High Path	The block I live in, Eleanor House, needs some attention. Eg the stair way and damp proofing of walls to exterior but basically, again the homes are solid and sound enough to give at least 25 years more habitation. Minor improvements to surrounding areas could be undertaken and more trees put in to give shade and interesting outlook from our windows.	Design	N/A	Noted. The council has resolved to support the regeneration of Eastfields, High Path and Ravensbury to improve all three estates comprehensively and provide decent new homes set in a well designed neighbourhood, which incorporates street trees and open space
038016HP	How SA	High Path	Therefore I think the entire plan should be scrapped. I recommend a good environmental agency (eg Greenpeace) to collaborate with a more open – minded think tank like Kevin McCloud, to investigate some Dutch housing estates, using new technologies, eg split level housing or spirals. Also why use bricks? There are new materials now. Think ahead! Merton should try to retain its reputation and find a better plan.	Environment / Design	Planning Application	Noted. The general response at public consultation on the plan has shown a strong preference for the use of traditional building materials such as brick which have proven to be a robust material and complement the surrounding area. New materials and technologies are also supported where appropriate. For example policy EP.H6 (iv) sets out that developers must demonstrate how their new buildings will be more energy efficient than the existing buildings.
039016HP	How SA	High Path	Finally the name High Path is not relevant to the 21st Centenary. I suggest Hopemore Estate instead.	General	N/A	Noted.
001010HP	Hutchins JP	High Path	I have just received the 230 page plan about the regeneration plan on High Path Estate (the third one) I wonder how much all this costs?	General	N/A	Noted.
002010HP	Hutchins JP	High Path	I did fill in a form for Priory Homes and said then that all the residents I speak to do not want to move especially my neighbours in Will Miles Court who are mostly elderly and do not want to be uprooted at their time of life as they have done a lot of decorating and got new carpets, flooring, curtains and furniture and are happy where they are.	General	N/A	Noted
003010HP	Hutchins JP	High Path	The houses in Will Miles Court are only 30 years old and are big with separate kitchen and bathroom that suit the residents just fine. They also are well insulated and warm in the winter and most look after the gardens front and back which they will miss. I do hope that you can consider some of these points and think about the people who live here who are getting upset and worried about their future.	General / Design	Planning Application	Noted
040005EP	Kilroy L	Eastfields	I agree with the through road proposal between Tamworth Lane and Woodstock Way mainly to allow the diversion of or provision of a new bus route to serve the estate. But there could be a problem of traffic using the road as a 'shortcut route' through the estate. Probably a restriction maybe required for non-estate traffic. In any case a junction improvement with Tamworth Lane would be required.	Transport	Movement and Access E3	Noted. This connection would improve connectivity to adjoining neighbourhoods, facilitate improved public transport and generally eases traffic movement throughout the area, especially given the rail safety and congestion problems prevalent around the nearby Mitcham Eastfields level crossing. Proposals will need to demonstrate how proposals will impact the road network and might include measures to smooth or restrict access as suggested by the representation.
041005EP	Kilroy L	Eastfields	In view of the increased number of residents planned consideration should be given for provision of a GP surgery on the estate.	Other	Core Strategy	Noted. Policy EP. H4 land use supports other commercial and community uses on the estate. Although there is not currently an indication that new GP premises are required in this location, should a GP premises be required by the NHS there is scope to incorporate one within the new estate
042005EP	Kilroy L	Eastfields	Concern also for the increased amount of road traffic that will follow the redevelopment which will impact on the congestion that already occurs at the nearby railway level crossing. Thank you for the information that is available please keep me informed of further developments.	Transport	Movement and Access E3	Noted. Parking restrictions and traffic management will help to manage the flow and volume of traffic and especially the effects on the level crossing on Grove Road.
043013HP	Latimer T	High Path	I am a local resident in Bathurst Avenue and my house backs on to High Path. The estate is a huge eye-sore and a hideous blot on the landscape. All around are lovely victorian terraced houses. The new proposed 'cheap' blocks are just replacing one eye-sore with another. The victorian style terraced houses work. They have stood the test of time. They will not need redeveloping in 30 years. The answer is staring us in the face - I think we should learn from history and flatten the High Path Estate and rebuild it in the style of victorian terraced houses. It's what people actually want to live in.	Design	Townscape H1	Noted. Building at the scale of terraced houses would seriously reduce the number of homes on the estate, risking leaving existing residents without somewhere to live and not contributing to London's overwhelming need for new homes. The vision for the High Path Estate is that of the New London Vernacular which is based on some of the characteristics inherent to Victorian neighbourhoods such as pitched roofs, use of brick, traditional streets, mansion blocks, at a higher density.
005000MP	Met Police	All three	Thank you for inviting me to comment on the Estates Local Plan update, due to internal technical difficulties I am unable to open any externally held documents that are greater than 5mb. Is it possible for you to kindly email the three estate documents in separate emails as I can receive up to 15mb. Sorry for any inconvenience.	General	N/A	N/A
010000MP	Met Police	All three	This is further to my previous comments regarding Merton's Estate Local Plan, please pass the following onto the inspector. 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. The designs should be structured so that different uses do not cause conflict. All publicly accessible spaces should be overlooked to enhance surveillance. The developments should promote a sense of ownership, respect, territorial responsibility and community. If necessary physical protection can be included with well-designed security features. Increased activity in appropriate locations can create a reduced risk of crime and increase a sense of safety. The designs should also have future management and maintenance in mind to discourage crime in the present and the future.	Design	Street Network E2 H2 R2	Noted. The "Urban Design Principles" (Part 02) of the ELP which apply to all three estates are all founded on the principles of Secure by Design, including active frontages, defensible space, permeable, legible and accessible layouts. These issues are woven throughout the Estates Local Plan.
011000MP	Met Police	All three	In order to achieve a sustainable development the government has defined three fundamental dimensions : economic, social and environmental (National Planning Policy Framework (NPPF), page 2, paragraph 7). Crime has a direct impact on all three dimensions. NPPF section 7. Requiring good design, paragraph 58 requires local authorities to produce 'Local and neighbourhood plans' with a specific aim to 'create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion'. This message was repeated in paragraph 69 in section 8 Promoting healthy communities with the addition of 'safe and accessible developments, contain clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas'.	Design	Street Network E2 H2 R2	Noted. The "Urban Design Principles" (Part 02) of the ELP which apply to all three estates are all founded on the principles of Secure by Design, including active frontages, defensible space, permeable, legible and accessible layouts. For example, paragraph 2.46 "active design "The design of new development and streets must promote active design. This approach incorporates local facilities that are easily accessible on foot or cycle, and create good quality well maintained and safe places with convenient and direct routes through the development" These issues are also woven throughout the Estates Local Plan.

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012000MP	Met Police	All three	Policy 7.3 Designing Out Crime of the London Plan promotes a city of diverse, strong, secure and accessible neighbourhoods with greater security through design. "Boroughs and others should seek to create safe, secured and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.....Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.....Measures to design out crime should be integral to development proposals and be considered early in the design process, taking into account the principles contained in Government guidance on 'Safer Places' and other guidance such as Secured By Design published by the Police". In the interest of creating safer, sustainable communities Secured by Design principles and practices should be incorporated within the Estates Local Plan for Eastfields, High Path and Ravensbury and the development carried out in accordance to those details. By working with the local Met Police Designing Out Crime Officers I am sure accreditation could be achieved	Design	Street Network E2 H2 R2	Noted. The Estates Local Plan is in general conformity with the London Plan 2016. The London Plan is part of Merton's statutory development plan and any planning applications for the three estates wwill be subject to the policies within it, including those on designing out crime. For example, paragraph 2.46 "active design "The design of new development and streets must promote active design. This approach incorporates local facilities that are easily accessible on foot or cycle, and create good quality well maintained and safe places with convenient and direct routes throught the development". We would like to thank the Met Police for their contribution to date which has helped to improve the Estates Local Plan and they will continue to be a consultee on planning applications for the three estates. We are also aware that Clarion Housing Group has engaged with the Designing Out Crime officer at a very early stage.
013006EP	Modasia P	Eastfields	In reference to your recent communication dated 16th January, please find attached a petition, signed by residents of Hammond Avenue in relation to our concerns regarding the draft proposed plans that Circle Housing are in the process of submitting. We did not receive a response from Merton regarding this, so would appreciate it if you could kindly follow up accordingly and similarly enhance further your plan guidance with reference to the proposed layout and building heights.	Design	Building Heights E8	The diagram for Policy EP.E8 Buiding heights illustrates that the land to the rear of Hammond Avenue should be a base height (a) according to policy Ep.E8 (a) which states <i>"the majority of buildings acrss the estate must be of a height similar and harmonious to surrounding residential areas to contribute to achieving a consistency with the surrounding character"</i> The policy continues with <i>"building heights must be based on a comprehensive townscape appraisal and visual assessment"</i> Planning applications will be expected to demonstrate that they will make a positive, not negative contribution to the existing townscape.
014006EP	Modasia P	Eastfields	At present, it appears that not enough consideration has been taken regarding our concerns and similarly incorporating these concerns to ensure they are addressed in your plan guidance. As you can appreciate, Hammond Avenue consists of mostly one storey bungalows, so the new plans are deeply concerning for us, as they include the removal of the road (Clay Avenue) behind us and propose to build taller 4/5 storey buildings closer to our homes, which will leave us with no privacy whatsoever. (We are already forced to keep our rear curtains drawn with the current 3 storey buildings at the rear of our properties, so under these new proposals, it will worsen the situation for us all). A few of the residents also went to voice concerns at the evening sessions that Circle Housing held at the local school (St Marks Academy), but with no avail, as the architects/planning team were quite dismissive of our concerns and suggestions for amendments. This is very disheartening, as there is plenty of scope for them to amend the designs to avoid causing upset and imposing on anyone's privacy.	Design	Building Heights E8	It is not the intention of the plan to be too prescriptive as there are a variety of different opinions as to what constitutes acceptable development and high quality design. A flexible approach is considered best to allow sufficient design freedom whilst respecting the local context. There are a strict set of design criteria in the building heights policy that need to be adhered to without recourse to specifying storey heights. Additionally, the policy makes it clear that taller buildings should be located away from the edges of the site and therefore not in close proximity to Hammond Avenue. Existing planning regulations and guidance on privacy, overlooking, daylight and sunlight, and general amenity will ensure that new buildings do not impinge unacceptably on existing residents. If plans are proposed that are not sufficiently based on the local context, and any other guidance in the Local Plan, then this will be taken into account in the decision making process
015006EP	Modasia P	Eastfields	I believe it was approximately page 80 in the plan guidance that has specific reference to building heights being, ie buildings across the estate must be of a height similar and harmonious to surrounding residential areas to contribute to achieving consistency with the surrounding character" and "when viewed from outside the estate, taller buildings must not be seen to dominate the landscape". The current designs are not taking any of this into consideration, which is very worrying, as there is plenty of scope for the designs to be amended and similarly the plan guidance needs to be reviewed to ensure that this is being addressed, as at present the guidance relating to the height and layout appears to be very generic.	Design	Building Heights E8	Noted.
018007EP	Moore R	Eastfields	I just wanted to send an email stating my views on the new estate plan. I am completely for the regeneration of Eastfields and I think it would be great for the community.	General	N/A	Noted with thanks.
019007EP	Moore R	Eastfields	I am however, dissappointed with the lack of communication about what is actually going to happen to the tenants. I have recieved numerous leaflets and paperwork showing me what the estate is going to look like, but nothing telling me when we are likely to be moving or what year everything is likely to happen. I currently have a front door that is close to falling off, which the council refuse to replace because they said that as they are knocking the estate down they dont see this as an urgent repair. This is frustrating because if I knew how long I was going to be living in my flat for, I would predict if it was worthwhile to spend almost £300 on a new front door as I wouldnt like to spend that kind of money and be told that we are moving within the next couple of years ! I would also like to know that if I would like to move away or out of the area, would I be given priority to move quicker than others? thanks for reading and answering my questions,	Clarion Housing Group	Clarion Housing Group	Noted. Details of the tenant offer sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan.
248003RP	Morgan D		Apologies for the late submission but my original email was rejected due to a typo in the email address. With respect to the Merton Estates Local Plan, we had a question with regards to the detail of the plan thats sets out an objective to "reduce the severance on Morden Road" where the pink arrows indicate this is between the estate and Milner Road. Our main concern / question is that this is only about reducing pedestrian severance, rather than any proposal to remove the traffic barriers on Milner Road to allow for through traffic to go from Milner Road, cross Morden Road into the estate. The traffic barriers were installed onto Milner Road for a good reason and we want to ensure that they continue to be in place as part of this proposal.	Transport	Movement and Access H3	Noted. These barriers on Milner Road (outside the Estate Local Plan area) are unlikely to be removed as vehicles crossing Morden Road from one side to the other would significantly impact on the performance of this section of the highway network.
020003HP	Muller-Carpenter C	High Path	Please note that I am the owner of XXXXX Merton High Street, SW19, please could you forward me any information/correspondence relating to the redevelopment of High Path as the building I own is next door.	General	N/A	N/A
050001EP	Mundy A and Boniface K	Eastfields	This is a submission to the Merton's pre-submission Estates Local Plan. We broadly welcome the proposal and revised pre-submission with four reservations. To gain a greater level of support amongst the residents, the final iteration of this plan must address the following:	General	N/A	Noted.
051001EP	Mundy A and Boniface K	Eastfields	1. Take the opportunity to improve the transport accessibility from in the Mitcham Eastfields area from 'poor' to 'good'. Perhaps with the addition of more frequent busses and/or a commuter shuttle to and from Balham station from Mitcham Eastfields by using large area of unused land in and around the station. Turing Mitcham Eastfields into a spoke and Balham into a commuter hub – essentially giving tube access to Mitcham residents without the need to extend the Northern Line. Examples of hub and spoke model can be found globally.	Transport	Movement and Access E3	Noted. Following the success of the opening of Mitcham Eastfields and the introduction of new bus routes within the borough, LBM will continue to liaise with TfL for bus, rail tram and tube improvements to the Public Transport infrastructure in Merton.

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052001EP	Mundy A and Boniface K	Eastfields	2. p. 57 and 81 does not consider residents' views from Grove Road in line of sight through Lonesome Primary school site. Preferably a limit of building to two story within this line of sight. This would also address the feeling of being overlooked by residents of Woodstock way whose property back on to the site. Such a statement would add further weight and clarifies paragraph 3.38 p.62.	Design	Building Heights E8	Noted. Policy Ep.E8 (a) states "the majority of buildings across the estate must be of a height similar and harmonious to surrounding residential areas to contribute to achieving a consistency with the surrounding character". The policy continues with "building heights must be based on a comprehensive townscape appraisal and visual assessment" Planning applications will be expected to demonstrate that they will make a positive, not negative contribution to the existing townscape. The view of the estate across Lonesome primary school is somewhat screened by trees and other vegetation. Woodstock Way backs on to the BMX track which is not part of the Eastfields Estate.
053001EP	Mundy A and Boniface K	Eastfields	3.Further develop the ideas stated on pg.68 to allocate reasonable space to the development of a business community to support local employment. Restrict zoning to avoid the sites use to serve fast food. This would be in line with the councils stated ambitions of making Mitcham a safer and healthier place to live.	General	Land Use E4	Noted. As the estate is currently residential and sits within a suburban residential area, the council does not propose to require business floorspace as part of the Estates Local Plan. However as set out in para 3.65 on page 68 the council expects major development proposals to provide local employment opportunities during the construction phase. As part of the borough-wide planning guidance, the council is continuing to consider whether or not to introduce planning restrictions
054001EP	Mundy A and Boniface K	Eastfields	4. Clear guarantee that the construction of a road adjacent to the Acacia Centre would not put at risk the continued existence of the centre i.e. that it would be demolished or footprint reduced because of the roads construction.	Transport	Movement and Access E3	Noted. This will be reviewed as part of the construction management plan .
055001EP	Mundy A and Boniface K	Eastfields	Final point, the plan has misidentified the estate's location as Figges Marsh Ward (P.46) . It is in fact located in Longthornton Ward. Please do keep us informed about the submission to the Secretary of State and the publication of the independent planning inspector's report and adoption of Merton's Estate Local Plan.	General	N/A	Noted; no change proposed. The estate is on the boundary of Longthornton ward but is located in Figges Marsh ward.
269000NE	Natural England	All Three	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.	Environment	Open Space E5 H5 R5	Noted with thanks.
270000NE	Natural England	All Three	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. The changes being suggested are not proposing huge modifications to the numbers of homes on the sites so it is unlikely that there would be a detrimental impact upon either Wimbledon Commons SAC or Richmond Park SAC however the Habitats Regulations Assessment process needs to be followed through to ensure that this is taken into account and mitigation is considered at the early stage to reduce risks in the first instance before impacts are possible. Natural England will of course consider further comment when next consulted either during or after examination. Broadly however we do not have any major concerns to highlight.	Environment	Open Space E5 H5 R5	Noted with thanks.
009017HP	Nkrumah-Deity J	High Path	Please use High Path area to build a hospital, and an arena like O2 don't forget there should be a large Safeway Superstore there. This place need where a lot of people will be around always. It is not safe for flats and houses. This country in general is a very dangerous place because of the set up. Most places have no roads or streets. It is a close or crescent. No proper bright street lights. And good separate rooms in flats or houses to be very very spacious indeed.	Design	N/A	Noted. The principle land use will be residential in accordance with the existing site and surrounding area.
059014HP	Odera V	High Path	This is to inform you that as responsible citizens and long standing residents of Merton, we do not object to any House building projects which are fair and are not robbing us to subsidise new housing at our expense in the name of general/common good, through systematic means. Merton does not own any housing stock therefore the subject heading is misleading. It is the housing association in the driving seat and not the Merton Council and the housing association staff are the main contributors of the above document. Our current freehold housing rights, housing facilities and housing standards as we are enjoying now must be fully protected and at least be matched if cannot be improved in the replacement houses being offered to us. There must not be any restrictive/punitive covenants and ransom/clawback clauses (if we were to sell our house to upsize to meet our family needs), such as a 5 year 100% property price difference repayment and 11 year staggered profit repayment clauses, when we are currently enjoying 100% freehold house ownership rights without any debts and are in our 60s. We must be given at least the same opportunity to maintain our current housing facilities and employment chances as we are enjoying now, if it cannot be improved in the regeneration plan. Unfortunately, it would appear that the secret pact between the housing association and Merton Council is to safeguard their financial position without safeguarding our freehold and leasehold house owners' housing, financial and economic rights and wellbeing. It would also appear that the local plan is prepared to meet Merton's and the housing association's objectives at the expense of the High Path freeholders and leaseholders and we must be protected from these almighty powers who are not acting fairly in performing their public duties to all their residents. There is overwhelming bias in supporting/subsidising all social tenants of all estates and house owners of Ravensbury Grove at the expense of freehold and leasehold house owners of High Path and it is not fair.	General	N/A	Noted with thanks.

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Reference	Consultation's Responder	Estate	Comment	Policy Area	Policy	Officer Response
060014HP	Odera V	High Path	<p>Our current house is an end of terrace corner house. We have an on plot, big garage in the back garden which is our lifeline for our daily living space and employment. This facility is not replaced or taken into account at all as a loss of quality house space and facility which is our bread and butter. We require an independent on plot locked garage for our livelihoods as we have had it for the last 30 years.</p> <p>The new replacement house does not have a garage at all. This means a loss of our livelihoods. Any financial compensation for loss of a big garage is not an answer to our requirements of daily housing space needs and economic sustainment.</p> <p>A one size fits all approach is not the answer to our plight and the housing association must adopt flexible methods to meet our housing requirements, as we are enjoying now, as stated above.</p> <p>The housing association's measurements for internal and external properties and facilities are selective and somewhat manipulative, for example, we have a separate living room and kitchen, but in the new property it is open plan, so if we want to divide it separately, then the new wall which we will build will make it an even smaller house than what we have now. Also, access to living room is via the kitchen door which is totally impractical and dangerous for family living as well detrimental to home/self-employment.</p> <p>Focal spaces such as a fire/chimney place, is not taken into account. If we were to remove the chimney, we can have enough space to fit an office desk. So that is a total loss of space. Also we have big windows and windowsills, which will be lost in the new designs. We will not have direct sunlight and natural air circulation because of the new designs which are extremely poor, for example, a bathroom is in the middle of two bedrooms, without windows.</p>	Clarion Housing Group	Clarion Housing Group	<p>Noted. Details of the residents offer sit with Clarion Housing Group.</p> <p>Clarion Housing Group response <i>"As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed. Residents needs and priorities have been the focus of our consultation and engagement with residents since 2013. The layout of replacement homes is not yet determined but houses will be capable of being built either as open plan or with separate kitchens and living space. Where the design allows bathrooms will have windows but the priority will be to provide natural light and ventilation to habitable rooms."</i></p>
061014HP	Odera V	High Path	<p>All new houses are at least 0.5-1metre narrower than our current house, therefore we will not be able to use bigger 4 seater sofas as we have now in our new houses. It will be cramped and an impractical living space. Although it may be same in total square metres, it is not in terms of its most usable design/space. Roof terrace space and the ground level space are not comparable spaces. Our living rooms are not of the same size as we have now. The layout/designs of the living room, kitchen and bathroom are impractical unusable designs – for example, all rooms are rather narrower and linear than our current squarely build living room and bedrooms. The wall between the kitchen and living room allows us to have extra wall cupboards for storage, as well as ground level storage or to hang a flat screen TV. But new designs are open space, therefore totally useless for our big family use. The same applies to loft space and quality ground level garden space, as well as the location of the property which is deprived of direct sun light, natural air circulation and open sky views which we are enjoying at the present time.</p> <p>Rodney Place replacement houses' internal designs and sizes are extremely undesirable. Our needs and views are totally ignored, particularly for internal designs and sizes, which is extremely demoralising.</p>	Clarion Housing Group	Clarion Housing Group	<p>Noted. Details of the residents offer sit with Clarion Housing Group.</p> <p>Clarion Housing Group response <i>"As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed. Residents needs and priorities have been the focus of our consultation and engagement with residents since 2013. The layout of replacement homes is not yet determined but houses will be capable of being built either as open plan or with separate kitchens and living space. Where the design allows bathrooms will have windows but the priority will be to provide natural light and ventilation to habitable rooms."</i></p>
062014HP	Odera V	High Path	<p>The so called independent surveys (e.g. Membership Engagement Services, Newman Francis, PRP architects, Savills, Future Merton) and public consultation questions were designed to achieve selective outcomes in favour of the housing associations and the Merton Councils secret housing regeneration plans and true feedback from affected residents is systematically excluded or misrepresented in all documents.</p>	Clarion Housing Group	Clarion Housing Group	<p>Noted.</p>
063014HP	Odera V	High Path	<p>There will be no direct sunlight for Rodney Place Houses once the tower blocks/ flats are built around it, and this is not good for a healthy environment or in line with the current layout of the area.</p>	Design	Building Heights H8	<p>Noted. Policy EP.H8 Building Heights sets out that applicants must consider the sensitivity of Rodney Place. For example section (g) <i>"the close proximity of Rodney Place and Merantun Way create a need to respect existing low rise development... Building heights in this area must particularly respect and be sensitive to these constraints..."</i></p>
064014HP	Odera V	High Path	<p>We were going to convert our huge loft space into a third bedroom similar to 68 Nelson Grove Road, but cannot do it now due to the impending housing regeneration proposals. We have plenty of loft space, which we are using for multipurpose use, and we can convert it to another bedroom as per our needs.</p> <p>We are an overcrowded family and we look to have a bigger house in Rodney Place, but we will only be offered a 2 bed house as we have now, we are happy to upsize it to a 3 bedroom house to alleviate overcrowding by paying a reasonable cost to difference between 2 bed and a 3 bed house, but not at an open market value. We will be charged for a 3 bed house, which is in fact of the same size as our 2 bed house. The only difference is that the loft in our 2 bed replacement house, is converted into a bedroom, calling the same size house a 3 bed house, therefore we are financially penalised for the same sized house, which we are supposed to get as a replacement house.</p> <p>New housing is supposed to resolve overcrowding problems for all residents affected by the housing regeneration and not only the social tenants. We were social tenants in the past and just managed to improve our life chances after 40 years of struggle and hard work only to face punishment for being prudent when we are at the end of our lifecycles.</p> <p>There is nothing wrong with our current house. It is of sound build and has gas central heating, double glazing, loft and cavity insulation etc. and we are being forced to accept lower housing facilities to facilitate housing regeneration at our cost, basically to rob us to support the housing association to meet their decent home standards requirements at our cost. This should not be allowed because the housing association acquired Merton's housing stock to bring it up to what it considers decent home standards within five years, and it failed to do so. And we are being penalised for Merton Council's and the housing association's deficiencies.</p> <p>The housing association wants to become the sole owner of the High Path area through systematic means. It is offering us punitive/restrictive covenants and terms and conditions by changing our current favourable house ownership rights. For example, the housing association is deliberately designing the houses in such a way, to attract service and administration charges from current 100% freehold house owners, when it is not appropriate. For example, linking street houses to a communal heating system, or running</p>	Clarion Housing Group	Clarion Housing Group	<p>The issues raised concern Clarion Housing Group's detailed masterplans. These detailed matters will be addressed through the statutory planning application process.</p>

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065014HP	Odera V	High Path	<p>Pincott Road is a historical, traditional Victorian terrace type street with some traditional terrace houses similar to Victory Road across Merton High Street, but it is not mentioned in any documents, and there are no prominent pictures of houses in Pincott Road in the housing association's or Merton Council's documents.</p> <p>All of High Path can be designed to fit in with the streets and houses across Merton High Street and Abbey Road which is more in line with the properties in the area. Rather than turning High Path into a concrete jungle of tower blocks owned by a monopoly multinational charitable organisation, robbing Paul to pay Peter. We were told that the tower blocks will be replaced with traditional street type houses as there was plenty of space on High Path to do so with innovative designs but this was just a ploy to meet their devious objectives.</p> <p>The above option is not mentioned or offered in any of the residents surveys or local plans and documents.</p>	Design	Street Network H2	Noted. Pincott Road is identified as a traditional street. Policy EP.H2 "street networks" sets out how new streets should be based on a traditional street alignment for example (a) <i>Nelson Grove Road and Pincott Road provide an appropriate basis for the deisng of the new street network</i> ". <i>The vision for the high Path Estate is that of the New London Vernacular which is based on some of the characteristics inherent to Vicorian neighbourhoods such as pitched roofs, use of brick, traditional streets, mansion blocks, at a higher density.</i>
066014HP	Odera V	High Path	<p>We the law abiding, prudent citizens and true financial stakeholders, (owners of freehold traditional houses and leasehold houses and flats are the main losers because we are not treated fairly in terms of replacement houses and terms and conditions related to new housing/housing offer etc. in comparison to social housing tenants).</p> <p>It is rather strange that the housing association and Merton Council has decided to exclude the proposed Harris Academy Secondary School development on High Path from all their documents.</p> <p>The impact of a new proposed secondary school on High Path, is not mentioned anywhere in the whole document, and will have a detrimental and devastating effect on the current and future residents, the entire High Path regeneration project, antisocial behaviour/law and order situation and an adverse effect on other residents of Merton passing through High Path. For example, extra traffic, footfall, problems at bus stops and underground stations, local supermarkets with more than 1000 children entering and leaving High Path at least 3 times a day and not to mention evening activities which is now a norm for all Secondary Comprehensive Schools.</p> <p>The entire project is skewed in favour of Circle Housing and Merton Council, but not in favour of independent residents of freehold houses and leaseholders of Merton, for example Pincott Road terraced houses.</p> <p>The High Path local plan must not be inferior than any other housing standards applicable to other houses in Merton. The so called acute need for more houses in London must not be used to subsidise Council budgets at the expense of current freehold and leasehold owners of High Path. London Mayor's minimum housing standards, density and parking restrictions must not be used to lower our current and better standards of housing and parking facilities.</p> <p>If our current housing standards and facilities cannot be improved by the regeneration project than please do not rob us of what we have got now.</p> <p>Thank you.</p>	Clarion / Other	Clarion Housing Group	Noted Parking provision is required to meet London Plan standards. For a highly accessible location this is likely to mean reduced levels of parking provision. Measures will be put in place at the time of planning applications to manage demand and how spaces are used.
067014HP	Odera V	High Path	<p>It is rather strange that the housing association and Merton Council has decided to exclude the proposed Harris Academy Secondary School development on High Path from all their documents.</p> <p>The impact of a new proposed secondary school on High Path, is not mentioned anywhere in the whole document, and will have a detrimental and devastating effect on the current and future residents, the entire High Path regeneration project, antisocial behaviour/law and order situation and an adverse effect on other residents of Merton passing through High Path. For example, extra traffic, footfall, problems at bus stops and underground stations, local supermarkets with more than 1000 children entering and leaving High Path at least 3 times a day and not to mention evening activities which is now a norm for all Secondary Comprehensive Schools.</p>	Other	Planning Application	Noted. The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan.
068014HP	Odera V	High Path	<p>The entire project is skewed in favour of Circle Housing and Merton Council, but not in favour of independent residents of freehold houses and leaseholders of Merton, for example Pincott Road terraced houses. //The High Path local plan must not be inferior than any other housing standards applicable to other houses in Merton. The so called acute need for more houses in London must not be used to subsidise Council budgets at the expense of current freehold and leasehold owners of High Path. London Mayor's minimum housing standards, density and parking restrictions must not be used to lower our current and better standards of housing and parking facilities.</p> <p>If our current housing standards and facilities cannot be improved by the regeneration project than please do not rob us of what we have got now.</p>	General	Planning Application	Noted. The homes at High Path will be required to demonstrate that they adhere to the planning policies on housing size in place at the time of any planning application, as with any other development proposal in Merton.
044004HP	Phillips C	High Path	<p>Thanks for a copy of the above 'Plan'. I thought it was very Geometric in design.No curves or bends. Right angles and like it!! And you must face in the correct direction!! Very Eco. Eutopia then????</p>	Design	N/A	Noted.
045004HP	Phillips C	High Path	<p>What I find a bit mystifying about the whole 'Plan', is the sudden change in mind-set, re. estate maintenance. Tasks which should be carried out to a high standard at present, eg. street cleaning, street lighting, replacement of broken or missing fencing, out door painting of bike shed door, of course there aren't any in 'The Plan', so that's one problem solved, highway maintenance etc. All these tasks are going to be of the highest standard. If it is known standards are not satisfactory at the moment, why are residents having to wait. Surely insulting treatment to residents.</p>	Clarion Housing Group	Clarion Housing Group	<p>Noted. Issues relating to maintenance sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan.</p> <p>Clarion Housing Group response "<i>CHG place a strong focus on providing responsive, reliable services to residents and will continue investing in the communities. With regards to the repairs service CHG acknowledge that there have been problems in the past so they put an improvement plan in place that involved working with Councillors and Residents to identify areas where they needed to refocus efforts to deliver the best possible service for residents. The improvements implemented have resulted in a more consistent and better quality service with locally based delivery and dedicated surveyors for each neighbourhood.</i>"</p>

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046004HP	Phillips C	High Path	A couple of points. You mention a couple of times how presently, some people complain of feeling 'unsafe' when walking through the estate (High Path). It's the lack of right angled junctions and controlled traffic, but, might it also be the fact; * there are parts on this estate, where there have been no street lights (five in one area alone) * roads not swept for years, think Hayword Close and Nelson Grove Road, where the leaves are so crunched into the Tarmac, on wet days, it's downright dangerous under foot.	General	N/A	Noted.
047004HP	Phillips C	High Path	What I find a bit mystifying about the whole 'Plan', is the sudden change in mind-set, re. estate maintenance. Tasks which should be carried out to a high standard at present, eg. street cleaning, street lighting, replacement of broken or missing fencing, out door painting of bike shed door, of course there aren't any in 'The Plan', so that's one problem solved, highway maintenance etc. All these tasks are going to be of the highest standard. If it is known standards are not satisfactory at the moment, why are residents having to wait. Surely insulting treatment to residents.	General	N/A	Noted. The maintenance of the Estate sits with Clarion. It is outside the remit of the Estates Local Plan.
048004HP	Phillips C	High Path	One last thing. A few years ago, large sums of money were spent renovating Nelson Gardens to celebrate his, I think, 200th anniversary. All sorts of people attended, including the media. It wasn't long before the place became a wilderness and a popular for alcoholics to chill out in.	General	N/A	Noted.
049004HP	Phillips C	High Path	You forgot to mention the 1,000 pupil school going to be 'slotted in' in a narrow strip of land on High Path!!!!	Other	Planning Application	Noted. The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan. Passed to Clarion for response
249008EP	Rahli Y		Hello I live in Clay Avenue and I want know when the project will start because I'm going to decorate my house and changing a lot of stuff as well e.g. kitchen, bathroom etc. So if it will start soon I don't need to spend my money. Thank You!	Clarion Housing Group	N/A	
122004RP	Ravensbury Residents Association	Ravensbury	Ravensbury Residents Association -3rd February 2017 Ravensbury RA Response to Stage 3 Local Plan for Ravensbury 1.0 Introduction: This is the Ravensbury Residents Association response to Merton Council's Stage 3 Pre-Submission Local Plan for Ravensbury. 2.0 Overview of Report In the Stage 3 report, it does appear that very little attention has been paid to certain aspects of the residents Stage 2 responses. We would like the Planning Inspector to request copies of all of these 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.	General	N/A	Noted.
122104RP	Ravensbury Residents Association	Ravensbury	Case in point is EP R1 para 3.242 (page 150) concerning the reversal of the Ravensbury Court flats. At all stages of this consultation, many residents have said that this is a ridiculous idea, but Merton Council have chosen to retain this idea even at Stage 3, showing lack of regard to consultation responses.	Design	Townscape R1	Agreed. Recommend Minor modification 24 Paragraph 3.242 pg. 150 " Development proposals should consider alteration of the internal layouts of the ground floor flats to Ravensbury Court, to reorientate the front doors onto the pleasant open space in front of the block. Changes to the layout of the rear of these retained flats could also improve car parking and provide some private back gardens " <i>'At the time of the preparation of this plan, there are currently no proposals to refurbish Ravensbury Court that would require planning permission. Any future proposals to refurbish Ravensbury Court flats should be explored in partnership with residents. Subject to residents' views, these could consider providing doors to the living rooms of the ground floor flats to provide direct access from the open space on Ravensbury Grove. There is also scope to improve the space to the rear of the flats for the benefit of residents .Minor Modification 25</i> Ravensbury, Map of R1 townscape, page 152 Alter figure for R1 Townscape and corresponding key in line with Minor Modification 24 (no plans to refurbish Ravensbury Court) Noted.
122204RP	Ravensbury Residents Association	Ravensbury	It also appears that conversations between the council and their housing partner Circle Housing (now Clarion/Latimer) have exerted excessive influence in certain aspects of this final version of the Local Plan. Case in point are the references to the area of Ravensbury Garages at the southern end of Ravensbury Grove. At first this area was barely even referred to in the draft Local Plan, due to Merton Council's desire to sell off the site as quickly as possible, & thereby advancing the push for demolition of the Ravensbury Estate. This area has now been granted planning permission in advance of the Local Plan being finalised. This seems to be an attempt to usurp the proper process of consultation for the Local Plan, and therefore the push for regeneration and the consultation itself has been seen as an affront to Ravensbury community at large. This is why many residents feel it to be pointless to partake in the consultation.	General	N/A	Noted.
123004RP	Ravensbury Residents Association	Ravensbury	3.0 Previous Responses to Stage 2 It should be noted that we have provided extensive responses to Stage 2 of the Local Plan, but have observed that some of these points have been ignored by Merton Council and their Future Merton team at Stage 3. Those responses will not be extensively repeated here but we hope they will be reviewed by the Planning Inspector.	General	N/A	Noted. All of the representations raised at Stage 2 were considered in preparing the Estates Local Plan (see Statement of Consultation SD8). In recognition that the Ravensbury Residents Association response contains many useful diagrams and images to explain the points made in text which do not appear in the summary of representations, the council has included the full copy of the stage 2 and stage 3 representations from the Ravensbury Residents Association as an appendix to the Statement of Consultation SD8. Yes, full copies of the representations received at Stage 2 consultation (Feb-March 2016) and stage 1 (Sept-Nov 2014) are submitted separately as part of the examination (SD16)

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124004RP	Ravensbury Residents Association	Ravensbury	<p>4.0 Policy EP R1: Townscape</p> <p>Paragraph 3.242 makes mention of the reversal of Ravensbury Court flats. This idea was revealed to the residents of Ravensbury Court who thought the idea preposterous. They were more than happy with their current layout as it provides the privacy & intimacy of a post-war mews type arrangement. Furthermore, the interior courtyard provides for a sense of community and has done for a number of generations. It seems that the council is unhappy with a cohesive community such as Ravensbury and it is also unhappy that such an enormous amount of scorn has been poured upon their ideas. This idea has to be one of the most ridiculous ones ever meted out on a thoroughly undeserving number of residents.</p> <p>In paragraph 3.243, Ravensbury Court is said to have "a rather dead frontage". Some residents thought it might be nice to be able to access the grassed areas through a new back door, but none thought it a good idea to actually reverse the entire layout to suit. Why this idea has been retained at Stage 3 is beyond any understanding. It should be also noted that residents did not want further concrete patios to be installed to the rear of their properties.</p>	Design	Townscape R1	<p>Agreed. Recommend Minor modification 24 Paragraph 3.242 pg. 150 "Development proposals should consider alteration of the internal layouts of the ground floor flats to Ravensbury Court, to reorientate the front doors onto the pleasant open space in front of the block. Changes to the layout of the rear of these retained flats could also improve car parking and provide some private back gardens" <i>'At the time of the preparation of this plan, there are currently no proposals to refurbish Ravensbury Court that would require planning permission. Any future proposals to refurbish Ravensbury Court flats should be explored in partnership with residents. Subject to residents' views, these could consider providing doors to the living rooms of the ground floor flats to provide direct access from the open space on Ravensbury Grove. There is also scope to improve the space to the rear of the flats for the benefit of residents.</i></p> <p>Minor Modification 25 Ravensbury, Map of R1 townscape,page 152 Alter figure for R1 Townscape and corresponding key in line with Minor Modification 24 (no plans to refurbish Ravensbury Court)</p>
125004RP	Ravensbury Residents Association	Ravensbury	<p>5.0 Policy EP R2: Street Network</p> <p>EP R2 part b) states that Ravensbury Grove MUST be extended fully to the boundary of Ravensbury Park, suggesting that a paved area or road should be run right up to the park. However this ignores the fact that the southern end of Ravensbury Grove forms designated open space land that has been used by residents for access to the park as well as an area for leisure pursuits and relaxation ever since the estate was built. This area must not be lost. For many years this has formed a transition zone from park to estate. This area has been invaluable to residents as it presents an introduction to the estate and also actively extends the park into the estate. We feel that the report serves to undervalue this grassed space in order to enable excessive construction density.</p>	Transport	Street network R2	<p>Noted. Recommend proposed minor modification 29 (to Policy R5 Open Space justification, para 3.275, page 162) to clarify the update regarding the designated open space at the end of Ravensbury Grove.</p> <p>"The relatively small portion of designated open space adjacent to Ravensbury Park is of poor quality. The regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality. <i>In September 2016 Merton Council's Planning Applications Committee resolved to grant permission for a scheme in this location (Ref 16/P1968). Should a decision notice be issued and this scheme be capable of being delivered, then this will have a bearing on the designation of open space at this location.</i>"</p>
126004RP	Ravensbury Residents Association	Ravensbury	<p>In paragraph 3.252, the Morden Road access lane should be retained. Flood attenuation measures can be served without removal of this area which currently serves as shared space and for incidental play.</p>	Environment	Environmental Protection R6	<p>Noted. The planning application will be accompanied by a Flood Risk Assessment and a Drainage Strategy, which will be in accordance with the NPPF, the London Plan 5.11 (Green Roofs), 5.12 (Flood Risk Management) and 5.13 Sustainable Drainage. As set out in policy R6 full consideration must be given to the incorporation of Sustainable Drainage Measures (SuDS) and this will include the use of green roofs. In terms of the comment made regarding the two existing river channels on Ravensbury Mill, this is taken into account within the existing River Wandle flood risk maps and hydraulic model and this will form a part of evidence base for the Flood Risk Assessment. Any proposals must not result in an increase in flood risk either to or from the site. The channel along Morden Road will also need to be assessed in detail with regards to hydraulic performance and flood risk. Such a channel may offer improvements for other sources of flooding, particularly surface water and this could form part of a wider swale network as in the justification to policy R6.</p>
127004RP	Ravensbury Residents Association	Ravensbury	<p>In paragraph 3.253, residents have repeatedly rejected the potential for a new access onto Morden Road. A new access would ruin the secluded nature of the estate, which it should be noted is considered by both residents and professionals as a high quality of the area, allowing for relaxation, seclusion from the busy main road and a very high quality of living for those away from the main road.</p> <p>Running a straight Ravensbury Grove up to the park will also serve to destroy the tranquillity of this area. It should also be noted that Ravensbury Grove will need speed attenuation measures in order to reduce speeding in future. There is little mention in this report of speeding and prevention of anti social behaviour through motorbikes or speeding cars.</p>	Transport	Street network R2	<p>Noted. There are no definitive proposals for a new vehicular access onto Morden Road. As stated in paragraph 3.254, "<i>this policy section [EP.R2 Street network] is about the creation of clearly defined and understood streets. It does not define vehicle movement. This is addressed by policy EP.R3. Paragraph 3.253 states New street network proposals should be well designed to prove clear connections that will reduce the current detached make up of the estate while ensuring that the estate does not become a through route for traffic from Morden Road... Any new access from Morden Road with flexibility to vehicular movement may also be considered, subject to an assessment of potential impacts</i>" Policy EP.R3 also clarifies that there are no definitive proposals for new access from Morden Road to the Ravensbury estate, but that streets onto Morden Road must be designed as traditional streets, irrespective of whether they are for vehicular use (EP.R3(d))</p>
128004RP	Ravensbury Residents Association	Ravensbury	<p>6.0 Policy EP R3: Movement & Access</p> <p>Little has been said of the Ravensbury Urban Design review report by Sue McGlynn Urban Design Ltd, in which mention is made in regards to:</p> <p>"However, it is important not to make the estate over-permeable as this will undermine seclusion for residents and disperse movement and activity without any real gains in wider connectivity."</p> <p>Our residents back this concept and feel that the theme of permeability is exaggerated in terms of the benefits to Ravensbury. We feel that there has been no suggestion to improve links with Morden in terms of crossing Morden Road. Removal of the current crossing and moving it towards the Surrey Arms helps leisure usage but does nothing to encourage the safe passage of commuters. Inclusion of another crossing at the junction of Wandle Road would be preferable due to the fact that many people attempt the dangerous crossing in order to shorten the journey towards Morden. This should form part of the traffic calming measures suggested. Ravensbury Grove will need speed attenuation measures in order to reduce speeding in future. There is little mention in this report of speeding here and prevention of anti social behaviour through motorbikes or speeding cars.</p>	Transport	Movement And Access R3	<p>Noted. There are no definitive proposals for a new vehicular access onto Morden Road. As stated in paragraph 3.254, "<i>this policy section [EP.R2 Street network] is about the creation of clearly defined and understood streets. It does not define vehicle movement</i> ." This is addressed by policy EP.R3. Paragraph 3.253 states <i>New street network proposals should be well designed to prove clear connections that will reduce the current detached make up of the estate while ensuring that the estate does not become a through route for traffic from Morden Road... Any new access from Morden Road with flexibility to vehicular movement may also be considered, subject to an assessment of potential impacts</i> " Policy EP.R3 also clarifies that there are no definitive proposals for new access from Morden Road to the Ravensbury estate, but that streets onto Morden Road must be designed as traditional streets, irrespective of whether they are for vehicular use (EP.R3(d)) Traffic management measures at specific locations within the estate will be determined alongside specific planning applications. Map R.3 Movement and access illustrates the enhancement of existing pedestrian routes, including those to the bus stop on Wandle Road which will improve connections by foot and bus to Morden town centre.</p>
129004RP	Ravensbury Residents Association	Ravensbury	<p>7.0 Policy EP R4: Land Use</p> <p>Densities are key to the character of Ravensbury and should be moderated in an area of such outstanding character. We are concerned that there is little here in this section than fully reflects the unique environment of the Ravensbury estate and the need to restrict the densities to the benefit of the immediate area and that of Merton generally.</p>	Design	Land Use R4	<p>Agreed and is part of Estates Local Plan policy including Policy EP.R4 and Policy. EP.R8 "building heights" which states "<i>while there is a need to increase density, to do so too much would undermine the landscape character of the area. Building heights must not compete with established mature trees which envelope the estate. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area</i>"</p>

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130004RP	Ravensbury Residents Association	Ravensbury	<p>8.0 Policy EP R5: Open Space</p> <p>The open space directly adjacent to Ravensbury Park has the potential to be of lower quality than that currently in existence. In fact, the planning permission for Ravensbury Garages has already implied that the actual quality of the space is a feature that is lacks proper interrogation. We would request that the language in this section be strengthened to preserve high quality views and appreciation of Ravensbury Park. Replacing the total area of say a grassed space with chunks of gardens that will no longer be public space is not the correct reinterpretation of open space. Also suggesting that the sum area of patches of grass placed around a paved area is equal to the previously large expanse of grass that provided for an extensive view of the park and also provided communal leisure space, seems an incorrect deployment of planning guidance. Positioning a building in the direct line of sight of the park seems against the spirit of planning itself.</p> <p>Essentially, the division of a large open space into multiple area and redistributing those parts around an area in piecemeal fashion should be proscribed in this section. This would enable the quality of the space and environment to be retained and enhanced.</p>	Environment	Open Space R5	<p>Minor Modification 29 recommended. In September 2016 Merton Council's Planning Applications Committee resolved to grant permission for a scheme in this location (Ref 16/P1968) subject to the negotiation of a section 106 agreement to allow the establishment of 21 residential units. Policy EP R5(a) requires any future development to re-provide this open space to a suitable location within the development. The Council officer's report for Application 16/P1968 confirms that Council considers that the proposed re-provision options submitted by the applicant did not meet the quality and quantity tests for Council to designate these proposed pieces of land for open space use. It is considered that this decision supersedes proposed Policy EP R5(a) and Minor Modification 29 is recommended to clarify this:</p> <p>EP.R5 Open Space, Paragraph 3.274, page 162 "The relatively small portion of designated open space adjacent to Ravensbury Park is of poor quality. The regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality. <i>. Should a decision notice be issued and this scheme be capable of being delivered, then this will have a bearing on the designation of open space at this location.</i>"</p> <p>Should the scheme at 16/P1968 be built and the spaces provided be recommended for designation as open space, then this can be considered through subsequent borough-wide local plans.</p>
131004RP	Ravensbury Residents Association	Ravensbury	<p>9.0 Policy EP R6: Environmental Protection</p> <p>Little seems to be said in regards to the creation and promotion of habitat within the estate as the current estate layout provides for wildlife through its large gardens, extensive number of trees and shrubbery. The new estate should readily incorporate wildlife provision through the planting of hedges, trees and general shrubs. There will otherwise be a sum loss of wildlife & habitat through the regeneration of Ravensbury.</p> <p>Gardens and even homes themselves should be designed to actively promote wildlife in the form of birds, invertebrates and small mammals. Green roofs could be incorporated but there seems to be no mention of this.</p> <p>Maintenance of the banks of the Wandle needs to be controlled by means of a wildlife statement detailing when its ok to trim vegetation and which trees should be left alone. We have had recent cases of Merton Council instructing their tree surgeon contractors to cut back the trees and carry out their own risk assessments. We think risk assessments for wildlife need to be created independently in such a sensitive area frequented by roosting bats and other creatures. Independent wildlife risk assessments should be incorporated into part n)</p> <p>In terms of flooding, nothing has been said of the Ravensbury Mill which has two channels already, one hidden beneath the mill, and one that runs alongside. This suggests that there is no need for a small channel along Morden Road and that such a channel would actively promote flooding due to the contours of the land in the area.</p> <p>Existing flow paths could be exacerbated by the incorrect provision of roads and openings on to Morden Road. Provision should be made for studies to examine the impact of the road layout on flooding and the modifications required to improve the situation.</p> <p>In paragraph 3.289 we think it advisable to agree where the top of the bank of the main river actually lies, and to consider the reinstatement of the bank where possible if this is of benefit to the wildlife habitat.</p> <p>In paragraph 3.291, the use of open swales could suggest the use of gravel, but we do not think this particularly suit the estate character and does little to encourage earth worms which are a staple diet of many creatures in the area. We request that grassed swale area are considered equally.</p>	Environment	Environmental Protection R6	<p>Noted. Policy R6 ((g) (h) and (i) all refer clearly to the enhancement of biodiversity, protected species and habitats, net biodiversity gains. As set out in Policy R6 (d), Sustainable Drainage Measures (SuDS) must be part of major development proposals and must be designed to have other benefits such as enhancing biodiversity. In terms of the comment made regarding the two existing river channels on Ravensbury Mill, this is taken into account within the existing River Wandle flood risk maps and hydraulic model and this will form a part of evidence base for the Flood Risk Assessment. Any proposals must not result in an increase in flood risk either to or from the site. The channel along Morden Road will also need to be assessed in detail with regards to hydraulic performance and flood risk. Such a channel may offer improvements for other sources of flooding, particularly surface water and this could form part of a wider swale network as stated in the justification to policy R6. The Flood Risk Assessment will assess the existing and proposed impacts on overland flow routes from all sources of flooding, including impacts from the road network. The top of bank is a defined as being the general line of the river, when flows are running at 'bank-full' and it is the point whereby Environment Agency consent is required for any structures or works in accordance with the Water Resources Act 1991 and Land Drainage Byelaws. Policy R6(h) refers specifically to development not encroaching on the river bank buffer zone for maintenance and biodiversity gains.</p>
132004RP	Ravensbury Residents Association	Ravensbury	<p>10.0 Policy EP R7: Landscape</p> <p>Nothing has been said of the extensive area at the southern end of Ravensbury Grove and how the Ravensbury area will be made worse by the overdevelopment of this uniquely sensitive area. Excessive height here impact on the entirety of Ravensbury estate and will also damage the park itself. The public views here should be mostly retained, otherwise they will be lost forever.</p> <p>We have included our response to the planning application as this covers many of the salient points in regards to Landscape in Ravensbury. Please see Appendix 3.0, attached separately.</p>	Environment	Landscape R7	<p>Minor Modification 29 and 30 recommended.</p> <p>Minor Modification 29 In September 2016 Merton Council's Planning Applications Committee resolved to grant permission for a scheme in this location (Ref 16/P1968) subject to the negotiation of a section 106 agreement to allow the establishment of 21 residential units. Policy EP R5(a) requires any future development to re-provide this open space to a suitable location within the development. The Council officer's report for Application 16/P1968 confirms that Council considers that the proposed re-provision options submitted by the applicant did not meet the quality and quantity tests for Council to designate these proposed pieces of land for open space use. It is considered that this decision supersedes proposed Policy EP R5(a) and Minor Modification 29 is recommended to clarify this:</p> <p>EP.R5 Open Space, Paragraph 3.274, page 162 "The relatively small portion of designated open space adjacent to Ravensbury Park is of poor quality. The regeneration of this site provides an opportunity for the on-site re-provision of this open space to a better quality. <i>. Should a decision notice be issued and this scheme be capable of being delivered, then this will have a bearing on the designation of open space at this location ."</i></p> <p>Minor modification 30 insert the following into EP.R7(b) page 170 Heights should allow views to the surrounding established trees. <i>Any plans should also seek to retain other mature trees within the estate.</i></p>
133004RP	Ravensbury Residents Association	Ravensbury	<p>11.0 Policy EP R8: Building Heights</p> <p>We think that "taller buildings must be located around the edge of the estate" is open to misinterpretation, and that more specifically Morden Road should be defined as the location for slightly higher buildings. Ravensbury Grove must not receive taller buildings and neither must the southern boundary with Ravensbury Park.</p> <p>It should be noted that Ravensbury Court is actually a part 3 and part 4 storey building. The part 3 storey is closer to the park and does not attempt to compete with the surrounding tree canopy. This should inform future buildings to not exceed 3 storeys in height. The 4 storey element of Ravensbury Court actually serves to screen the industrial estate. Therefore any building of 4 storeys in height will effectively screen the tree canopy of Morden Hall Park and Ravensbury Park, which should be fully proscribed. We think it unfortunate that no mention of storey heights has been made in section EP R8.</p> <p>The character of Ravensbury is made up of the scale of the buildings. Along Ravensbury Grove, buildings should not exceed 3 storeys, preferably with the uppermost storey being contained within the roof. In fact 3 storeys incorporating roof space living is an ideal height around Ravensbury as it enables higher density without excessively impacting on the character and environment. Mansard roofs could be employed to good use in this respect. //It is important not to compete with the 4 storey element of Ravensbury Court as the result will ruin the character of the area.</p>	Design	Building Heights R8	<p>Minor Modification 31 recommended: EP.R8(a) second para, page 172 "To ensure this taller buildings must be located around the edge of the estate <i>no buildings must</i> extend higher than the existing Ravensbury Court flats" Policy. EP.R8 "building heights" states "while there is a need to increase density, to do so too much would undermine the landscape character of the area. Building heights must not compete with established mature trees which envelope the estate. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area"</p>

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134004RP	Ravensbury Residents Association	Ravensbury	4.0 Conclusion: Whilst we appreciate this opportunity to guide the future of Ravensbury, we also think that many opportunities are being lost. Namely those that will preserve the unique character and environment of Ravensbury. The now 4 year old push for regeneration has resulted in a great deal of anger from residents. This has been due to the high levels of disregard meted out by the housing association's regen team towards existing members of the Ravensbury community. Many residents are only too aware of the beauty that resides in Ravensbury and the fact that any redevelopment will effectively scar the setting of the area and result in a net loss of area afforded to social housing and quite possibly the loss of quality public space.	Design	Townscape R1	Noted. The council's Estates Local Plan is based on a through site analysis of the Ravensbury Estate and the area in which is site. The vision for Ravensbury is based around a suburban parkland setting. The policies in the Estates Local Plan for Ravensbury focus on maintaining the secluded parkland setting set out in the vision for Ravensbury. The Estates Local Plan will not scar the setting of the area nor will it result of quality public space nor will it result in a net loss of affordable housing.
135004RP	Ravensbury Residents Association	Ravensbury	The fact that the self same regen team meet with the council's Future Merton on a regular basis only serves to muddy any possible concept of impartiality during the assembly of the Estates Local Plan. We therefore hope that the information we have provided enables the independent Planning Inspector to judge this document appropriately & fairly.	General	N/A	Noted. As encouraged by national guidance and good practice, the council's officers met with as many different stakeholders as possible during the preparation of the Estates Local Plan residents, Clarion Housing Group, statutory consultees and other interested parties all of whom helped to shape the Estates Local Plan. This is set out in the council's Statement of Consultation.
112003EP	Reeves C	Eastfields	I am responding to the Pre-Submission Estates Local Plan for Eastfields. I do not feel there has been enough time to fully process and research the plan, having received it after the 16th January. Especially for those of us who work full time and have young/elderly families to support. Also, the Design workshops planned by Circle, supposedly to give us a fuller understanding of design, design principles and how these fit with local planning have not yet been completed; the last one is not due to be held until the 28th February.	General	Planning Application	Noted. We are sorry that you received the plan in January when publication started on 8th December 2016.z The council has adhered to relevant planning requirements e.g. the Town and Country Planning (Local Planning) (England) Regulations 2012, concerning the preparation of the Estates Local Plan, to ensure that sufficient time has been provided at each stage of the Plan's preparation to respond to consultation.
113003EP	Reeves C	Eastfields	As a homeowner, I am also concerned about the mixed messages being received from Circle Housing and Merton Council. Whilst the plan, and covering letter, infers that the regeneration will go ahead, we were told by Merton representatives, at a meeting last year, that Eastfields was highly unlikely to be regenerated due to flooding, insufficient space for new builds (before houses could be demolished), and one road in, one road out making it impossible for lorries and building work to access the estate safely, and without major disruption to residents. How has this suddenly changed?	General	Environmental Protection E6	Noted. The council is unaware of the statement that Eastfields might not be part of the Estates Local Plan. Merton council has been working with Clarion Housing Group and the Environment Agency to consider the flooding within the Eastfields. Through the statutory planning process any development which takes has minimal detrimental flooding impact.
114003EP	Reeves C	Eastfields	The plan itself only appears to focus on the 'negatives' within the estate and, whilst I agree Eastfields does look slightly shabby (predominantly those dwellings owned by Housing Associations), I was concerned about Eastfields being seen as a 'Fortress'. Having lived here for over 30 years, the sense of community is strong, as witnessed by the attendance at meetings and the anger and dismay of being told Eastfields was being regenerated.	General	N/A	Noted. The council would agree that the community meetings it has held has attracted a large number (and proportion) of Eastfield residents. Representations to the consultation from Eastfield estate have, when taken together, showed the most support for regeneration.
115003EP	Reeves C	Eastfields	More specifically: Health & wellbeing 2.12 Who was involved in the health impact assessment? Does this relate to health and wellbeing during the whole process, or just once regeneration is agreed and takes place? And whose health and wellbeing does it relate too? Obviously not those of use currently living here. At no point during the past four years has our health and wellbeing been discussed. The stress and upset of not knowing what will happen to our homes has been immense. This has been made worse by crass and insensitive comments by both Merton and Circle staff during the consultation, i.e. 'You're lucky you haven't got a mortgage. My husband left me and I've got to pay mine mortgage for another 20 years.' (but they aren't at risk of losing their home). 'You should feel lucky you are getting a new home which is better than where you live now, and will be worth more.' We do not feel lucky at all! We have worked hard to pay our mortgages and keep our properties in good order, as have many of the housing association tenants. We may now be forced to move out of our homes (Circle representatives did admit, in a public meeting, that compulsory purchase would be used if residents didn't agree to their offer), or move into temporary accommodation whilst Circle houses are being built! We will then have to live on a building site for up to 10 years whilst the regeneration is completed.	Other	N/A	The Health Impact Assessment (HIA) was carried out by the council in partnership with Public Health and is a key piece of evidence that supported the preparation of the Estates Local Plan. The purpose of HIA is to promote sustainable development by integrating health (including mental health) and wellbeing 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 or the development options. The HIA will be used to assess each stage of the Plan making process and make recommendations to mitigate identified negative impacts, to enhance the proposals or to secure a positive impact.
116003EP	Reeves C	Eastfields	Urban Design principles 2.4 '...promote biodiversity through open space, street trees.....' There will be much less open space once regeneration takes place, with over twice the amount of dwellings/units are there are currently. One of the features that attracted us to Eastfields was the open space, which creates light within our homes. Under the new designs, houses will be much closer together and overlooking each other, making them darker inside. 2.8 Permeable, legible and accessible layouts Eastfields is accessible and easy to get around. Many local people from 'off the estate', are able to walk or cycle to Eastfields station, to local bus stops and to Mitcham Town Centre. There is nothing on the estate that restricts this.	Design	Townscape E1	Noted. New housing development will be expected to meet relevant planning policy standards including standards concerning the provision of gardens, amenity space, private outdoor space and play space as appropriate and make a positive contribution to the wider network of open spaces.
117003EP	Reeves C	Eastfields	Site analysis 3.23 & 3.27 'Access for vehicles is confusing as the estate is part access from Acacia Road and part from Woodstock Way.' 'This inefficient layout restricts accessibility for vehicles, pedestrians and cyclists.' The road closure was put in place to stop commercial and private vehicles, from off the estate, using the road as a rat run, causing danger to children, and air pollution. There were also young moped riders using it as a race track, with several accidents. Eastfields is accessible and easy to get around. Many local people from 'off the estate', are able to walk or cycle to Eastfields station, to local bus stops and to Mitcham Town Centre. There is nothing on the estate that restricts this. How can vehicle access be restricted when it is predominantly residents who live here driving onto the estate?? By opening up the road you risk the road becoming a rat run again, and greater car usage through the estate will cause higher pollution levels. Why is it ok for public roads to have barriers restricting cars but estates can't?	Transport	Site analysis	Noted. Policy EP.E3 (a) states <i>Proposals for the estate must investigate the feasibility of Acacia Road, Mulholland Avenue and Clay Avenue being combined into a single street with full vehicular access at both ends</i> " Access should be explored but if this was not desirable for residents safety, then this would not go ahead. The paragraphs in the representation refer to the site analysis, not the policy.
118003EP	Reeves C	Eastfields	3.30 '...the smaller spaces leading off this are less successful, as they are enclosed by the back gardens of the surrounding houses.' This is precisely what has supported the community feel within the estate. Children have a safe space to meet and play, where parents can keep an eye on them. During summer months, people use the smaller spaces to socialise.	Environment / Design	Site analysis	Noted.
119003EP	Reeves C	Eastfields	3.36 '.....to make the BMX track less visually isolated.' Whoever has been involved in this plan has not taken anyone's views into account regarding the BMX track and the major issues it causes. Noise; air pollution, from the dozens of cars attending events; danger from cars; road rage; residents not being able to park, or get into their own properties easily as BMX spectators have parked in front of their houses. Fortunately, I don't live anywhere near the track, but these are just some of the issues which have been raised at meetings and ignored. Whilst the BMX track is a great idea for children, there needs to be some consideration of the problems caused.	Design	Site analysis	Noted.

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120003EP	Reeves C	Eastfields	<p>Site specific policies</p> <p>Justification</p> <p>3.61 'Eastfields is located in an area with a low Public Transport Accessibility Level...'</p> <p>We have a mainline railway station, within 10 minutes walk, with easy access to London Victoria and London Bridge, as well as many local stations, including Balham, Streatham, Sutton, Wimbledon and Kingston. We can also get the train to local tram stops. There are two local buses that stop just on the edge of the estate, both go through Mitcham, where other transport can be accessed. Ten minutes walk away are buses to Croydon and Streatham. These bus stops can also be accessed via the local buses. Whilst I appreciate that people with disabilities may find access difficult, it would not be because there is a lack of public transport. During our many previous meetings with Circle, one thing that was raised was the good transport links, with people who have moved to Eastfields as it's easy for them to get to London for work. The cynical amongst us are wondering whether this is being 'played down', as new properties could bring a premium price being so close to the station.//To be honest, I could add more points but I have run out of both time and motivation (I can hear you cheering!!). And have no faith that these comments will be acknowledged, especially as they are the same comments that we, as residents, have put to both Merton Council and Circle Housing time and again, and which continue to be ignored.</p>	Transport	Site analysis	As set out in paragraph 3.16 (site analysis for Eastfields), while public transport access to and from Eastfields has greatly improved since Mitcham Eastfields train station opened in 2008, the station currently has two trains an hour to central London and the south east. Two bus routes serve the area (Tamworth Lane, Grove Road, Woodstock Way). This leads to the Public Transport Accessibility Level being defined as low (between 1b and 3 across the estate) according to Minor Modification 08.)
13600SAV	Savills / Clarion / Latimer	All Three	<p>Submission Draft Estates Local Plan Consultation</p> <p>Representations made on behalf of Latimer Developments Limited</p> <p>Further to the issue of the 'Submission Draft Estates Local Plan – Stage 3 Consultation (December 2016 – February 2017) we write to make formal representations to the consultation on behalf of Latimer Developments Limited (Latimer).</p> <p>Circle Housing Merton Priory and Latimer Developments Limited</p> <p>The Submission Draft Estates Local Plan (ELP) refers to Circle Housing Merton Priory (CHMP) as the body to which the three estates were transferred to. Merton Priory Homes (which trades as Circle Housing Merton Priory) was formed in 2010 as a result of the transfer of stock from Merton Council and at that time became a subsidiary within the Circle Housing Group. Circle Housing Merton Priory owns and manages around 9,500 homes across Wimbledon, Morden and Mitcham including the Eastfields, High Path and Ravensbury estates. In November 2016 the Circle Housing Group merged with the Affinity Sutton Group (through a merger of the two parent companies, Circle Anglia Limited and Affinity Sutton Group Limited) to become Clarion Housing Group. Clarion Housing Group is the largest housing group in the country with over 125,000 homes. The merged organisation comprises the parent company, Clarion Housing Group Limited, a number of charitable housing associations, including Circle Housing Merton Priory, a charitable foundation and a commercial company called Latimer Developments Limited..</p> <p>As part of the Merton Regeneration Project, Latimer and Circle Housing Merton Priory plan to regenerate the Eastfields, High Path and Ravensbury estates.</p>	General	N/A	Noted. Minor amendment proposed throughout plan: Circle Housing Merton Priory Clarion Housing Group.
13700SAV	Savills / Clarion / Latimer	All Three	<p>Overview</p> <p>Latimer welcomes 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.</p> <p>Latimer (and Savills as their planning agent) also request to participate in the examination hearings on Merton's ELP and to be notified when the document is adopted.</p> <p>As you will be aware, Latimer is at an advanced stage of preparation of the outline planning applications for the three estates and it is anticipated that these will be submitted prior to the examination hearings.</p> <p>Following a thorough review of the latest draft ELP, we have a number of minor comments and suggested amendments that we discuss in the following sections.</p>	General	N/A	Noted
13800SAV	Savills / Clarion / Latimer	All Three	<p>Comprehensive Regeneration</p> <p>Latimer has undertaken an extensive feasibility and discounting exercise in selecting these three Estates for regeneration. Latimer has considered a number of alternative options, such as meeting Decent Homes Standards only, as set out in the Case for Regeneration and after extensive assessment recognises that the full regeneration of High Path and Eastfields and the partial regeneration of Ravensbury presents the greatest opportunity to realise significant physical, social, economic and environmental benefits for not only the Estates but the wider Borough. Latimer is therefore supportive of the Council for bringing forward the DPD to aid the comprehensive regeneration of each of the Estates.</p> <p>The DPD at paragraph 2.21 refers to "comprehensive regeneration". Whilst Latimer is committed to the delivery of all three schemes, in planning terms planning permission could be granted for them individually. As such it would be helpful if the DPD recognised that the schemes are not mutually dependable and that they could therefore be granted planning permission separately should this be required.</p>	General	N/A	<p>Noted. Whilst the applications could be submitted separately, Clarion Housing Group have advised that delivery of regeneration of the three estates is extricably linked due to viability. Clarion Housing Group have 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. The regeneration of Eastfields and Ravensbury is also financially dependent on High Path regeneration coming forward. The council has resolved, most recently in November 2016, to consider and support the Estates Local Plan on the basis of all three estates coming forward. This is stated as a key driver (in the Key Drivers section, see heading "Delivering regeneration across all three estates" Recommended for additional clarity to add following sentence to the end of the paragraph 2.21 (Modification 3))</p> <p><i>Merton Council's resolutions in July 2014 to explore regeneration via the creation of an Estates Local Plan and in November 2016 to submit the Estates Local Plan to the Secretary of State have been made on the basis of the three estates being linked as part of a single regeneration programme. .</i></p>
13900SAV	Savills / Clarion / Latimer	All Three	<p>Development Plan</p> <p>The draft ELP will form part of the development plan and as such it is important to make it clearer, that any planning application must have regard to the whole development plan, including The London Plan (2016), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, unless material considerations indicate otherwise. This is an important legislative context that should be included within the DPD. This is currently not clear in paragraph 2.8 of the draft ELP.</p>	General	N/A	<p>Agreed. Recommend the following three modifications for additional clarity</p> <p>Modification 4 Page 20 add new para after 2.26 stating: Para 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:</i> -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</p> <p>Modification 5 Para 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>Modification 6 Insert the following paragraph 2.33 ... HighPath and Ravensbury estates as indicated in the respective maps overleaf. <i>These indicate specific boundaries for the Policies Map of the three estates to which the Estates Local Plan policies apply. .</i> Upon adoption of the Estates Local Plan</p>
14000SAV	Savills / Clarion / Latimer	All Three	<p>Large Sites and Surrounding Character</p> <p>As we stated in our previous representations, the London Plan Policy 3.7 identifies that large sites (measuring 5ha or more) are able to create their own distinct character and support higher densities. This is further supported within the GLA Housing SPG paragraph 1.3.35 which refers to sites over 2ha being a large site and therefore able to create their own character and define their own setting. Whilst it is</p>	Design	Planning Application	<p>No change proposed. It is an important design aim, reinforced in policy at various levels (NPPF, London Plan, Core Planning Strategy; Sites and Policies Plan) that design should relate and respond positively to its context. It is the aim of the Estates Local Plan to ensure that new development on the estates fits well and harmoniously with its surroundings and does not t repeat past mistakes, some of which are the reasons why regeneration is considered necessary now. This is particularly noticeable with High Path and Eastfields, where the urban form is either fragmented or alien to what it surrounds. It is therefore not</p>

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14100SAV	Savills / Clarion / Latimer	All Three	The London Plan describes suburban sites as 'areas with predominantly lower density development such as, for example, detached and semi-detached housing, predominantly residential, small building footprints and typically buildings of two to three storeys'. Whereas an urban area is classified as 'areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District Centre, or along main arterial routes'. Taking these definitions into account, alongside the size of the sites we do not regard it appropriate to describe the estates as suburban.	Design	Planning Application	The submitted planning application will be determined in accordance with the London Plan Density Matrix using the TfL Webcat tool.
14200SAV	Savills / Clarion / Latimer	All Three	Conflict Between Policies and Inconsistencies The design teams have undertaken an extensive review of the draft ELP and wider Development Plan and have developed outline masterplan proposals on the basis of detailed urban design analysis. We are broadly supportive of the changes the Council has made to rectify the conflicts between policies in the previous draft. Notwithstanding this, we have identified the following areas where amendments should be made: . Policies EP H7, EP E7, EP R7 contain restrictive landscape requirements which do not align with the requirements contained under other policies. For example, Policy EP H7 'Landscape' requires a number of mature trees to be retained in the playground to the north of the 'Marsh Court' block which is in direct contradiction with the urban design requirements for a building to be located fronting Pincott Road.. We suggest therefore that Policies EP H7, EP E7 and EP R7 should read that where possible, existing trees will be retained, however retention should be based upon a robust arboriculture and urban design analysis in line with Policy 7.21 of the London Plan.	Environment	Landscape E7 H7 R7	No change proposed. Taking the example raised in the representation, the council's arboriculturalist has carried out a survey of the existing trees on High Path and the advice is that many of the existing trees are category A and B, every effort should be made to maintain these trees. It is our view that this does not conflict with having buildings fronting Pincott Road as set out in HP1 townscape (c) <i>The key entry points into the estate at either end of Pincott Road and Nelson Grove Road are the most suitable locations for landmark buildings". Policies E7, H7 and R7 are in general conformity with London Plan Policy 7.21 "Trees and Woodlands" (c). LDF Preparation "Boroughs should follow the advice of paragraph 118 of the NPPF to protect 'veteran' trees and ancient woodland where these are not already part of a protected site . The concerns raised regarding the balance of arboricultural and specific building design will be undertaken as part of assessing any planning application, and any loss may be mitigated as also set out in London Plan policy 7.21 B <u>Planning decisions</u>. "Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species."</i>
14300SAV	Savills / Clarion / Latimer	All Three	. In accordance with national policy there is no requirement for the Exception Test to be undertaken for Eastfields and High Path. Reference to this should be removed from the justification sections for Policies EP E6 and EP H6.	Environment	Environmental Protection E6 H6 R6	No change proposed. The NPPF acknowledges that some areas will (also) be at risk of flooding from sources other than fluvial. All sources must be considered when planning for new development including: flooding from land or surface water runoff; groundwater; sewers; and artificial sources. . The two parts to the Test require proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. We would refer applicants to the advice and flow chart within section 8 of our Level 1 SFRA.
14400SAV	Savills / Clarion / Latimer	All Three	. The PTAL rating at High Path varies across the site from between 4 and 6a. Eastfields and Ravensbury also have a PTAL rating of up to 3, and at Eastfields there is potential for this to improve through an increase in Thameslink services. These more accurate PTAL ratings could be recognised in the draft Local Plan rather than the blanket figure currently set out for each estate.	Transport	Movement and Access E3 H3 R3	Agreed. Modification 08: Eastfields para 3.16 page 52 Amend as follows "... mean that the Public Transport Accessibility Level (PTAL) score is low at only 2 which is defined as poor by the London Plan varies between 3 and 1b ." Modification 12 High Path para3.107 page 90 Amend as shown "area having a PTAL Level of 5 4 to 6a ." Modification 22 Ravensbury paragraph 3.217 page 137 Amend as shown ...to Morden Road reduces accessibility. Within the estate the PTAL is rating varies between 2 and 3 . On Morden Road it is 3
14500SAV	Savills / Clarion / Latimer	All Three	. The High Path red line plan does not include St John's Hall which is within the forthcoming outline application boundary for the estate regeneration. It is recognised that the red line boundary for the applications can differ to those included in the DPD. However, for completeness we have provided an updated Plan for High Path at Appendix 1 which we would encourage the Council to utilise.	General	N/A	Noted. No change proposed The Estates Local Plan covers the regeneration of the three housing estates and does not include sites which are adjacent, purchased by Clarion Housing or successors during the lifetime of the project (e.g. St John's Hall, Old Lamp Works) This does not preclude their redevelopment in any way.
14600SAV	Savills / Clarion / Latimer	All Three	Prescriptive Policies Paragraph 2.5 of the draft ELP introduces the plan as a 'wholly design-led' document and is stated as being 'pitched at a high level; [with] specific building details will be developed by applicants such as CHMP and determined by the council through the planning application process'. This general approach is supported. However, this approach has not always been followed through in the policies and supporting text of the draft Plan. We welcome the increased flexibility in the draft ELP since the Stage 2 Consultation. 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 mechanically without regard to other Development Plan policies, and this could be made clearer within the DPD wording. Furthermore, as already noted, these are all large sites capable of creating their own character; therefore, the ELP should provide the flexibility required to allow this. Paragraph 59 of the NPPF, states that 'design policies should avoid unnecessary prescription or detail'. The Planning Practice Guidance (PPG) (ref: 12-010-20140306) also states that Local Plans "...should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability." Further, given that the regeneration of the Estates will be delivered over a number of years it is considered entirely appropriate that flexibility should be built into the ELP to allow development proposals to respond to changing circumstances in order to create successful places. This approach would be entirely consistent with the NPPF and the PPG.	General	N/A	No change proposed. It is an important design aim, reinforced in policy at various levels (NPPF ,London Plan, Core Planning Strategy; Sites and Policies Plan) that design should relate and respond positively to its context. It is the aim of the Estates Local Plan to ensure that new development on the estates fits well and harmoniously with its surroundings and does not t repeat past mistakes, some of which are the reasons why regeneration is considered necessary now. This is particularly noticeable with High Path and Eastfields, where the urban form is either fragmented or alien to what it surrounds. It is therefore not considered appropriate to over-emphasise or unduly encourage new proposals to create their own distinct character which could significantly contrast with their surroundings. They are not intended to be architectural or townscape 'set pieces' and must integrate well, and not be perceived as a barrier to movement or legibility through the wider urban area. .
14700SAV	Savills / Clarion / Latimer	High Path	We support the increased flexibility in the draft policies; however set out below are a few examples of where additional flexibility could be incorporated: . Townscape - Policy EP H1 (b) states that 'Streets must be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove'. As highlighted within our previous representations, the PPG (Reference ID: 26-008-20140306) notes that 'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities'. There are design and existing utilities constraints which will impact on the ability to provide a straight street through the site. Staggered streets create character and can reduce vehicular speeding. As such, this policy should allow for flexibility in how the central street is designed.	Design	Street Network E2 H2 R2	As stated in our response to this issue in Stage 2, clear unobstructed views along the whole length of Pincott and Nelson Grove Roads will maximise the visual connection from within the estate to surrounding areas and through the estate from outside it - specifically to make places that connect well with each other and feel safe - a key means of ensuring it fits in seamlessly with its surroundings. Removing or altering this this would undermine the aims the respondent is stating are important. The respondent gives no detail or example of the 'design and existing utilities' constraints they mention. Similarly, this point was made and answered in the previous consultation. Utilities, streets and buildings will be fundamentally changed across the estate and keeping one small element makes no sense in this context. Vehicle speeds in the streets will be managed by a whole range of measures not related to the positioning of buildings. All of the other streets on the estate are shown as straight, so it is unclear why one particular instance is being selected where it is claimed it is inappropriate. The assertion that straight streets encourage speeding is not supported. Plenty of other factors contribute to why people speed. Character is created by a range of means and staggering streets is not necessary to do this. Plenty of towns and cities have regular grid-based street networks without purposeful staggers and do not suffer in terms of character. The reasons of speed and character given as a justification for staggering streets are not considered robust to achieve these aims.

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14800SAV	Savills / Clarion / Latimer	High Path	Street Network - Policy EP H2 (b) provides prescriptive policy as to the street network to be retained and altered. Following the PPG guidance as noted above, providing a junction from Nelson Grove onto Morden Road may have traffic impact and movement issues, including being too close to the Merton High Street signalised junction. It would require all traffic to instead route through the masterplan site. As such, this policy could be amended to allow highways proposals to be developed at application stage through consultation with the relevant highways authorities.	Transport	Street Network H2	Noted. No change proposed. Whilst Policy EP.H2 <i>Street network</i> forms the basis of the road layout within the estate, access to roads and junctions can be restricted to vehicles, pedestrians, cyclists or any combination of the above. It is Policy H.3 <i>movement and access that</i> sets out the policy on vehicular movement . EP.H3 para 3.155 to 3.160 refers to the existing estate, the busy main roads at Morden Road, Merantun Way and Merton High St, the rat running through the estates that has resulted in restricted access and restricted junctions and the potential for tramlink at South Wimbledon (Morden Road) that should be taken into account. The map for HP3. <i>Movement and access</i> indicates that the junction with Morden Road and Nelson Grove is a "potential new access point" . As set out in policies HP1 and HP2 for reasons of good townscape, to enable movement and access throughout the estate (for residents, delivery vehicles etc) and to maximise flexibility into the future, the street network at Pincott Road and Nelson Grove Road should be designed wide enough to accommodate a main vehicular route. Junctions have been indicated as "main access point", "potential new access point", "improved cycle and pedestrian access" This approach allows specific access to junctions (left turns, right turns etc) to be determined at the time of planning applications but also allows maximum flexibility for the future - should traffic modelling demonstrate that universal vehicle access was desirable then this could be achieved if Nelson Grove Road and Pincott Road are designed to accommodate vehicles as the Estates Local Plan sets out.
14900SAV	Savills / Clarion / Latimer	High Path	Movement and Access - Policy EP H3(c) refers to including measures to reduce the physical barrier of Morden Road. It is suggested this is amended to refer to "where possible" to take account of this being outside of the site boundary and proposals to be developed in conjunction with the relevant highways authorities.	Transport	Movement and Access H3	Noted. No change proposed. Policy H3 <i>movement and access (c.)</i> states <i>Proposals must include measures to reduce the physical barrier (severance) caused by Morden Road to east-west pedestrian and cycle movement to better link The Path and Milner Road to the estate.</i> Paragraphs 3.155-3-160 clearly describe the physical barriers, particularly for pedestrians and cyclists but also for vehicle movement, created by the main roads including Morden Road This is an important requirement to improve connective and promote reduced car dependency, active modes of transport and London's heathy streets policies. No change is proposed to this policy as it clearly only applies to the area covered by the Estates Local Plan.
1500SAV	Savills / Clarion / Latimer	All Three	Open Space – Policies EP E5 (d), H5 (c) and R5 (d) state that 'All new houses must have gardens that meet or exceed current space standards'. This blanket approach is too restrictive and does not take into account the nature of various styles of properties. It is common for both mews and town house properties to have smaller garden spaces, reflecting their historic design. As such, the policy could incorporate greater flexibility to reflect the various characteristics of different housing types and character areas.	Environment	Open Space R5	No change proposed. These policies are in conformity with Policy DM D2 (a) and justification section 6.17 (minimum garden area) of Merton's Sites and Policies Plan (2014 and London Plan (2016) Policy 3.5 (Quality and design of housing developments) which collectively ensure that new homes must provide sufficient garden space for occupants. The sites and policies plan garden standards were examined as part of the borough-wide Local Plan in 2014 and subsequently adopted. At this stage the council has not considered evidence that would support a policy change that gardens for new homes in Ravensbury should be of a smaller size than elsewhere in the borough. Should applicants develop a scheme, at planning application stage the applicants could choose to justify a different approach to garden size based on the characteristics of their scheme.
15100SAV	Savills / Clarion / Latimer	High Path	Environmental Protection – Policy EP H6 refers to investigating the potential air quality benefits of a CHP on existing buildings outside the High Path estate. It is considered unreasonable and unfeasible for an air quality assessment to consider the potential benefits to existing buildings which are outside the control of the applicant and the application site..	Environment	Environmental Protection E6 H6 R6	Agree. Proposed Modification 21 Insert the following EP H6 h) (iii) Consideration of air quality issues should include an investigation into the potential benefits that a district heat network could deliver to the wider area through the connection to existing buildings or development sites outside of High Path's regeneration- <i>Evidence that the CHP has been designed and built in line with the London Plan and associated guidance (e.g. the Mayor's draft Air Quality SPG) which seeks high air quality standards and mitigates air quality impacts as well as reducing carbon emissions</i>
15200SAV	Savills / Clarion / Latimer	All Three	Landscaping – Policies EP H7, E7 and R7 each request that some existing trees on site should be retained. As previously mentioned some of these requirements are in direct conflict with other policies contained within the draft ELP. Furthermore, their restrictive nature limits the design-led process which the Council supports. The policy should therefore note that "where possible" existing trees will be retained; however retention should be based on a robust arboriculture and urban design analysis. This addition would reflect the wording contained within the High Path 'Issues and Opportunities: Good quality landscaping and vegetation" section (Page 102) which incorporates the statement 'unless there are other compelling reasons that provide benefits to outweigh this'. It is also noted that Policy EP R7 requires the widening and enhancement of the entrance to Ravensbury Park. This Policy should suggest the investigation of such measures only and be subject to feasibility.	Environment	Landscape E7 H7 R7	No change proposed. Taking the example raised in the representation, the council's arboriculturalist has carried out a survey of the existing trees on High Path and the advice is that many of the existing trees are category A and B, every effort should be made to maintain these trees. It is our view that this does not conflict with having buildings fronting Pincott Road as set out in HP1 <i>townscape (c) The key entry points into the estate at either end of Pincott Road and Nelson Grove Road are the most suitable locations for landmark buildings". Policies E7, H7 and R7 are in general conformity with</i> London Plan Policy 7.21"Trees and Woodlands" (c). <u>LDF Preparation "Boroughs should follow the advice of paragraph 118 of the NPPF to protect 'veteran' trees and ancient woodland where these are not already part of a protected site</u> . The concerns raised regarding the balance of arboricultural and specific building design will be undertaken as part of assessing any planning application, and any loss may be mitigated as also set out in London Plan policy 7.21 B <u>Planning decisions</u> "Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species."
15300SAV	Savills / Clarion / Latimer	All Three	Design Requirements (Pg 174 – 179) – This section of the draft ELP provides 'detailed guidance to applicants that they will be expected to focus on in more detail to demonstrate that the Vision, Urban Design Principles and Site-Specific Policies of the Plan can be delivered'. The section continues to refer to the design principles as guidance throughout this section. The title 'Design Requirements' thereby gives the impression of strict requirements and as such the section could be more suitably titled 'Design Guidance' to allow the masterplan proposals to respond accordingly. As set out previously, the draft ELP could also recognise that the level of detail to be provided with applications should be commensurate to the type and nature of the application i.e. an outline application will have less detail than a full application.	Design	Street Network E2 H2 R2	These are requirements as they give an indication of the information the Council requires in order to assess any application. Proposed Modification 32 Amend as shown Remove subheading GUIDANCE before Paragraph. 4.5
15400SAV	Savills / Clarion / Latimer	All Three	Design Requirements – This section makes reference to providing communal bin stores for refuse storage. This could be amended to allow other solutions to be considered, for example Underground Refuse Systems, which will be subject to agreement with the Council's waste team.	Design	Planning Application	Agreed. Proposed minor modification 33 to para 4.19 "Identify a strategy for the design and operation of refuse storage and collection. All proposals for refuse stores must be <u>ensure they are</u> convenient for residents and for collection, be <u>robust and well integrated into buildings</u> and accord with the council's guidelines on this. Flats should have communal bin stores <u>that are well integrated into their building</u> . Houses must have <u>individual</u> bin stores within the property boundary of each dwelling that are well integrated into the front defensible space. Bin stores for houses should not form part of a communal system. <i>The council may also consider alternative refuse collection methods, such as subterranean street-based refuse bins. Such systems must be convenient for residents and collection as well as being seamlessly and unobtrusively integrated into the townscape.</i>
15500SAV	Savills / Clarion / Latimer	All Three	. Whilst the drawings provided within the draft ELP provide helpful imagery as to the potential opportunities of the estates, these should not be regarded as rigid design requirements and therefore a statement noting that the drawings are for indicative purposes only could be added.	Design	N/A	No change proposed. Images, plans and graphics include a combination of specific requirements and general guidelines. Where information is given as guidelines, this is indicated, either in the text or in the relevant key (eg. Street Network Policies diagrams H2). It would therefore be misleading and inaccurate to provide a catchall statement stating all images, plans and graphics are for indicative purposes only.
15600SAV	Savills / Clarion / Latimer	All Three	Planning Application Specialist Document Requirements The draft ELP identifies a number of required documents to be submitted as part of a planning application on each Estate. An example of this is Policy EP E6 'Environmental Protection' where section (k) states that 'Development proposals must be accompanied by a working method statement and construction logistics plan'. The level of detail to be submitted as part of a planning application should be commensurate to the type and nature of the application. Additionally, policy requirements should not be so onerous as to require details not normally required for planning application validation purposes. Taking account of this, planning conditions should be used in which to secure the further details of outline planning applications for the three estates. This is acknowledged in the latter parts of the draft Plan; however, is not clear in some earlier policies.	Design	Planning Application	No change proposed. This is a standard requirement for a scheme of this scale and nature. The council;'s standard validation checklist will also apply and will take account of smaller schemes, should these be submitted.
15700SAV	Savills / Clarion / Latimer	All Three	Intensification Areas Policy 2.13 of the London Plan identifies South Wimbledon / Colliers Wood as an Intensification Area. High Path is within this Intensification Area and this should be acknowledged within the Estates Local Plan. Further, it could also be recognised that London Plan (paragraph 2.59) identifies that higher densities can be supported in Intensification Areas.	General	Regional Plan	No change proposed Although the London Plan South Wimbledon / Colliers Wood Area for Intensification is a relevant planning steer, we believe that other ways of explaining the benefits of the estate's location - such as its excellent access to public transport – are more effective and easier for non-planners to understand in explaining why High Path represents an appropriate location for intensified development. Merton is currently working with the neighbouring boroughs of Kingston, Sutton and Richmond on the establishment of a South London Opportunity Area. It is considered that the collective physical and strategic links of these boroughs provides an appropriate approach to identifying and establishing a future growth strategy for the borough. The Area for Intensification has been part of the London Plan since 2006 and its targets have already been met. .

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15800SAV	Savills / Clarion / Latimer	All Three	Financial Viability Part 05 (Delivery, Implementation and Monitoring) Paragraph 5.4 states that 'CHMP have committed to an open book accounting process to facilitate the understanding of the impact on residents and council services' with regards to financial viability. Latimer would like to confirm that they are committed to an Signature PNG open book accounting process with the Council; however it would not be appropriate for this to be made available in the public domain due to commercially sensitive information.	General	N/A	Merton is looking at improving the transparency of financial viability submissions, in line with other boroughs and the Mayors draft affordable housing and viability SPG. We are seeking to do this through changes to our planning application validation checklist, including that we accept submissions on the basis that they can be published, in full. The Council will need to ensure that it is consistent in its approach in this regard. It might be that in exceptional circumstances information can initially be withheld from full publication while a final decision on the application is outstanding. See paras 1.21 and 1.22 of the Mayors draft Housing and Viability SPG below for more information. However, applicants will need to be prepared for authorities having to make all elements of the submission public immediately following grant of planning permission, particularly given recent EIR Tribunal decisions and their responsibilities in best serving the public interest.
15900SAV	Savills / Clarion / Latimer	All Three	Summary The Council's support for the regeneration and intensification of the three Estates is welcomed, and the alterations made to date from previous consultations are broadly supported. There are however some remaining concerns with the draft ELP, highlighted in detail above. Latimer welcomes the opportunity to discuss these concerns with the Council in order to ensure flexibility within the policies can be achieved.	General	N/A	Noted
16000SAV	Savills / Clarion / Latimer	Eastfields	In addition, Policy EP E6 refers to the existing culverted watercourse, which as set out in our earlier representations, has not been identified by extensive technical surveys. As such reference to this should be removed or evidence provided by the Council to demonstrate the existence of the watercourse	Environment	Environmental Protection E6 H6 R6	No change proposed. The NPPF states Local Plans should be supported by Strategic Flood Risk Assessment (SFRA) and develop policies to manage flood risk from all sources (e.g. surface water, groundwater as well as rivers), taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as Lead Local Flood Authorities and internal drainage boards. Given the risk of fluvial and surface water flooding to High Path and Eastfields, the principles of the Exception Test should still be considered when developing both of these sites. Merton's SFRA 2016, produced in partnership with the Environment Agency and neighbouring boroughs, is noted. The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan.
109	Shea R	High Path	I am writing to express my reasons why the regeneration plan should not go ahead. The main reason is that Merton Priory has not considered the impact of Merton Council Decision to build a 1000 place school on the estates (see enclosed article from Wimbledon Guardian). As the last meeting I attended they were not aware of the school being built.	Other	Planning Application	Noted. The Estates Local Plan provides guidance for the regeneration of the three housing estates. The proposed Harris Academy Wimbledon may be located adjacent to the Estates Local Plan boundary, subject to land assembly, funding and planning permission. Should a planning permission be submitted for a secondary school on High Path, it will have to take account of the regeneration of High Path as set out in Clarion Housing Group's initial proposals and the Estates Local Plan.
110	Shea R	High Path	The available land is limited and pollution levels will affect the local residents.	Environment	Planning Application	Noted. Within the Estate policy EP.H6 (b) states that development proposals must demonstrate how their plans contribute to improving air quality.
111	Shea R	High Path	The other reason is the fact that the housing stock on High Path is not sub-standard and it is questionable as to why they have to demolish all of the properties when a high percentage of residents are on a low income	Clarion Housing Group	Clarion Housing Group	Clarion Housing Group response "A Case for Regeneration has been prepared and this demonstrates that the comprehensive regeneration of the Estate is most the sustainable option, and this has considered surveys of the existing building stock as well as consideration of issues such as environmental performance, housing need, urban design, sustainability and economic viability." Noted. The Ravensbury part 3 "site analysis and planning policies" contain a number of photos including of the raised flower beds outside Ravensbury Grove and the open / green spaces around Hengelo Court.
056001RP	Shellard A	Ravensbury	I've had a quick look through the Estate local plan regarding Ravensbury Estate and would like to highlight three points. Firstly, photos of the estate show just about the most drab and down-at-heel section of the estate - in Rutter Gardens. There are no photos showing the trees and lovely open green area in front of the community centre, the raised flower beds at the end of Ravensbury Grove (near the garages) or the other open/green spaces around Henglo Gardens and Ravensbury Court. If the more typical/prettier parts of the estate were shown it would be highlight the fact that regeneration isn't really needed at all and that the current residents are at risk of losing some beautiful spaces if the current plans go ahead.	Design	Townscape R1	Noted. Policy. EP.R8 "building heights" states "while there is a need to increase density, to do so too much would undermine the landscape character of the area. Building heights must not compete with established mature trees which envelope the estate. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area"
057001RP	Shellard A	Ravensbury	Secondly, the photos in the "The Vision" section, suggesting what the Ravensbury estate could look like (page 34), show mainly low-level buildings surrounded by plenty of green space. The actual plans however indicate that the pretty, low-level buildings currently in place (eg around the community centre) are to be bulldozed & replaced by high-rise blocks. No-one who lives on the estate wants high-rise blocks. We do not want to lose the current amount of open space or the low-level buildings which encourage a sense of community.	Design	N/A	Noted. Parking provision must meet London Plan standards for a highly accessible location this will mean reduced levels of parking provision. Measures will be put in place at the time of each planning application to manage demand and how spaces are used in accordance with the size of home that is being built.
058001RP	Shellard A	Ravensbury	Thirdly, I understand that parking will be reduced in the current plans, though this is not made clear in the stage 3 Local estates plan at all. Parking is already quite difficult around the estate. Reducing parking spaces and increasing residents will make the situation very stressful, and could, I imagine will lead to residents parking permits etc, something else that no-one wants.	Transport	Planning Application	Noted. As the main access, traffic conditions and movement along Ravensbury Grove is expected not to increase significantly but will be monitored at each stage of development. Alterations that encourage the belief that Ravensbury Grove is a through-road should not be installed. A best practice approach to streetscape design and access management will prevent improper use of this street
006009EP	Sleight B	Ravensbury	Thank-you for the opportunity to comment on the plans.Re: p156 Part 03 R3: Movement & Access 3.237 Proposed alterations will increase the volume of vehicular traffic along Ravensbury Grove. Proposed alternations at the end of Ravensbury Grove will give the impression that Ravensbury Grove is a connector road. Proposals should consider introducing physical features at key points along	Transport	Movement And Access R3	Noted. No change proposed. Policy EP R8 states that building heights in the vicinity of Ravensbury Garages must relate to the surrounding established tree canopy and to the scale of adjacent existing buildings.
007009EP	Sleight B	Ravensbury	Re: Part 03, p172 EP R8 Building heights e) Building heights in the vicinity of Ravensbury garages should take into account existing views to the tree-line from the existing buildings.	Design	Building Heights E8	Noted. No change proposed. Policy EP R8€ states that building heights in the vicinity of Ravensbury Garages must relate to the surrounding established tree canopy and to the scale of adjacent existing buildings.
008009EP	Sleight B	Ravensbury	Re: Part 03, p172 EP R8 Building heights, Justification 3.3.10 Reference to the existing buildings in vicinity of Ravensbury garages should made in relation to the views to the tree line visible from around the estate.	Design	Building Heights E8	I would be grateful if you can confirm receipt of this email. I would also be grateful if I can to be kept informed about the submission, the publication and the adoption.
008109EP	Sleight B	Ravensbury	I would be grateful if you can confirm receipt of this email. I would also be grateful if I can to be kept informed about the submission, the publication and the adoption.	Design	Building Heights E8	Noted
102000SA	Sport England	All Three	Thank you for consulting Sport England prior to the consultation on the preferred options version of the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. In response to the below email, Sport England would like to make the following comments:	Environment	Environmental Protection E6 H6 R6	

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103000SA	Sport England	All Three	Eastfields Policy EP E4 Land Use, High Path Policy EP H4 Land Use and Ravensbury EP R4 Land Use Objection These policies should specifically mention indoor and outdoor sports facilities and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', 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.	Environment	Land Use E4 H4 R4	<p>Minor Modification 04 and 05 proposed to clarify that development proposals across the three estates will be assessed against the statutory development plan at the time of any planning application, including the Estates Local Plan, Merton's Core Planning Strategy, London Plan 2016 and Sites and Policies Plan .</p> <p>Minor modification 4 Page 20 add new Paragraph after 2.26 stating: Paragraph 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:-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</i></p> <p>Minor modification 5 Paragraph 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>The priority of these Estates is for residential re-generation. This land has not been specially identified for the development of sports facilities however the consideration of sports facilities (See paragraphs 3.72 and 3.179) is enabled through the proposed open space policies. Where there is justification for the provision of a large public open space the Estates Plan encourages design to include sports courts and the plan states that development proposals for such spaces must be in accordance with para.74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>The Estates Local Plan does not duplicate policies in the rest of the adopted Local Plan (e.g. sports and recreation At the planning application stage applications to develop these estates will need to be assessed against Merton's Core Strategy Policies including Policy CS13 (h Leisure and Culture) which promotes new and improved sport and recreation facilities and Merton's Sites and Policies Plan Policy DM 01 (Open Space) which encourages the protection and enhancement of playing fields and opportunities for sport, recreation and play. London Plan policies 3.16 (Protection and enhancement of social infrastructure) and 3.19 (Sports Facilities) would also need to be considered. Proposed development and potential needs would also be assessed against Merton Council's Merton Sports Pitch Strategy (June 2011).</p> <p>The council prepared a Playing Pitch Study with Sport England in 2011. This strategy examines the boroughs supply and demand for pitches and the potential future requirements for pitch sports needs in Merton from 2012-2026, particularly in the first five years (to December 2016). From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Playing Pitch Study to inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport england on the scope of the new strategy to ensure it meets their requirements.</p>
104000SA	Sport England	All Three	Eastfields Policy EP E5 Open Space, High Path Policy EP H5 Open Space and Ravensbury Policy EP R5 Open Space. Objection These policies should specifically mention outdoor sports facilities and playing pitches and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', 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.	Environment	Open Space E5 H5 R5	<p>Minor Modification 04 and 05 proposed to clarify that development proposals across the three estates will be assessed against the statutory development plan at the time of any planning application, including the Estates Local Plan, Merton's Core Planning Strategy, London Plan 2016 and Sites and Policies Plan .</p> <p>Minor modification 4 Page 20 add new Paragraph after 2.26 stating: Paragraph 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:-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</i></p> <p>Minor modification 5 Paragraph 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>The priority of these Estates is for residential re-generation. This land has not been specially identified for the development of sports facilities however the consideration of sports facilities (See paragraphs 3.72 and 3.179) is enabled through the proposed open space policies. Where there is justification for the provision of a large public open space the Estates Plan encourages design to include sports courts and the plan states that development proposals for such spaces must be in accordance with para.74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>The Estates Local Plan does not duplicate policies in the rest of the adopted Local Plan (e.g. sports and recreation At the planning application stage applications to develop these estates will need to be assessed against Merton's Core Strategy Policies including Policy CS13 (h Leisure and Culture) which promotes new and improved sport and recreation facilities and Merton's Sites and Policies Plan Policy DM 01 (Open Space) which encourages the protection and enhancement of playing fields and opportunities for sport, recreation and play. London Plan policies 3.16 (Protection and enhancement of social infrastructure) and 3.19 (Sports Facilities) would also need to be considered. Proposed development and potential needs would also be assessed against Merton Council's Merton Sports Pitch Strategy (June 2011).</p> <p>The council prepared a Playing Pitch Study with Sport England in 2011. This strategy examines the boroughs supply and demand for pitches and the potential future requirements for pitch sports needs in Merton from 2012-2026, particularly in the first five years (to December 2016). From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Playing Pitch Study to inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport england on the scope of the new strategy to ensure it meets their requirements.</p>
105000SA	Sport England	All Three	OBJECTION – Local Plan & Evidence Base. The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that: "Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area ." Paragraph 175 of the NPPF states: "Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan ." Sport England is not aware of a robust evidence base for playing pitches and indoor sports facilities for Merton. It is not clear how this lack of evidence base has been/will be taken into account to develop this document.	Environment	Planning Application	<p>Minor Modification 04 and 05 proposed to clarify that development proposals across the three estates will be assessed against the statutory development plan at the time of any planning application, including the Estates Local Plan, Merton's Core Planning Strategy, London Plan 2016 and Sites and Policies Plan .</p> <p>Minor modification 4 Page 20 add new Paragraph after 2.26 stating: Paragraph 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:-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</i></p> <p>Minor modification 5 Paragraph 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>The priority of these Estates is for residential re-generation. This land has not been specially identified for the development of sports facilities however the consideration of sports facilities (See paragraphs 3.72 and 3.179) is enabled through the proposed open space policies. Where there is justification for the provision of a large public open space the Estates Plan encourages design to include sports courts and the plan states that development proposals for such spaces must be in accordance with para.74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>The Estates Local Plan does not duplicate policies in the rest of the adopted Local Plan (e.g. sports and recreation At the planning application stage applications to develop these estates will need to be assessed against Merton's Core Strategy Policies including Policy CS13 (h Leisure and Culture) which promotes new and improved sport and recreation facilities and Merton's Sites and Policies Plan Policy DM 01 (Open Space) which encourages the protection and enhancement of playing fields and opportunities for sport, recreation and play. London Plan policies 3.16 (Protection and enhancement of social infrastructure) and 3.19 (Sports Facilities) would also need to be considered. Proposed development and potential needs would also be assessed against Merton Council's Merton Sports Pitch Strategy (June 2011).</p> <p>The council prepared a Playing Pitch Study with Sport England in 2011. This strategy examines the boroughs supply and demand for pitches and the potential future requirements for pitch sports needs in Merton from 2012-2026, particularly in the first five years (to December 2016). From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Playing Pitch Study to inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport england on the scope of the new strategy to ensure it meets their requirements.</p>

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106000SA	Sport England	All Three	Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development.	Environment	Land Use E4 H4 R4	Noted. At the planning application stage applications to develop these estates will need to be assessed against Merton's Core Strategy Policies including Policy CS13 (h Leisure and Culture) which promotes new and improved sport and recreation facilities and Merton's Sites and Policies Plan Policy DM 01 (Open Space) which encourages the protection and enhancement of playing fields and opportunities for sport, recreation and play. London Plan policies 3.16 (Protection and enhancement of social infrastructure) and 3.19 (Sports Facilities) would also need to be considered. The Estates Local Plan does not duplicate policies in the rest of the adopted Local Plan (e.g. sports and recreation)
107000SA	Sport England	All Three	Sport England would be happy to provide further advice on how local authorities can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England's website at: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/ . In addition Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England's website at: http://www.sportengland.org/facilities-planning/planning-for-sport/previous-guidance/ . The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs. Information regarding planning obligations for sport can be found on Sport England's website at: http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions.aspx	Environment	N/A	Noted with thanks. From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Playing Pitch Study to inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport England on the scope of the new strategy to ensure it meets their requirements.
108000SA	Sport England	All Three	We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.	General	N/A	Noted with thanks.
091002HP	Thomas B	High Path	<ul style="list-style-type: none"> The plan appears to show a decrease in the amount of green areas, this too will mean that pollution will be increased. There needs to be focus on creating more green spaces, and more trees being planted and cared for. 	Design	Open Space H5	Policy EP.H5 "open space" states " <i>development proposals must provide public open space to address the identified deficiency in access to local open spaces. .</i> " demonstrates that currently High Path has a small deficiency in open space. The Estates Local Plan clearly proposes that any future development will add more open space.
092002HP	Thomas B	High Path	<ul style="list-style-type: none"> The plan appears to show a decrease in the amount of green areas, this too will mean that pollution will be increased. There needs to be focus on creating more green spaces, and more trees being planted and cared for. 	Environment	Open Space H5	Noted. The existing estate features a number of disconnected incidental areas of green space that have little amenity value and are not useful to residents. There is a lack of central open space or a network of open space areas for recreational use by residents. Policy EP H5 (a) of the Estates Plan states that there must be an equivalent or better re-provision of the area of designated open space with the boundary. Any planning application to re-develop the site will have to be assessed against this policy along with policies in Merton's Core Strategy (Policy CS13 (d)), Merton's Sites and Policies Plan (Policy DM 01) and the London Plan (Policy 7.18) which ensure developments maintain appropriate levels of open space and address identified deficiencies.
093002HP	Thomas B	High Path	<ul style="list-style-type: none"> The tram stop need not be in South Wimbledon as the walk to either Morden Road or Merton Park tram stops are not more than a 6 minute walk from South Wimbledon station. The tram stop would be better placed in Colliers Wood 	Transport	Movement and Access H3	Noted. Proposals for a tram stop at South Wimbledon are still at an early feasibility stage and may therefore change. The Council will continue to work in partnership with TfL to ensure that transport infrastructure opportunities are incorporated.
094002HP	Thomas B	High Path	<ul style="list-style-type: none"> Further to the pollution, it needs to be re-considered whether to have schools built in such a highly polluted area, any further increase in local schools will simply increase the number of children suffering from toxic air respiratory problems. Along with the impact on Teachers who will be required to work in the area and parents/residents. 	Other	N/A	Noted. This issue is outside the remit of the Estates Local Plan.
095002HP	Thomas B	High Path	I would like to be kept informed about the submission to the Secretary of State, the publication of the independent planning inspector's report and when Merton's Estates Local Plan is adopted.	General	N/A	Noted.
023009HP	Tinnelly J&H	High Path	Thank you for your letter inviting us to view the 'Pre-Submission Estates Plan'. Our main concern, that we would like to see reflected before submission, is that the plan does not seem to reflect the most recent proposals we have seen and objected to from Circle Housing. This raises serious concerns that the council and the housing authority are not in synch, and that Circle Housing is not reflecting key elements and policies laid out in your plan. In general we like and support your plan, which clearly puts the people who live in the neighbourhood at the centre of its policies. However we feel that these policies are not reflected in the plans of Circle Housing.	Design	Planning Application	Noted with thanks. Any regeneration proposals, including those presented by Clarion Housing Group will be determined in accordance with the Estates Local Plan, the London Plan and other policies. Any proposals that are not in accordance with the plans set out above, require the applicant to justify their proposals and amend their proposals accordingly.
024009HP	Tinnelly J&H	High Path	We raised objections to the most recent consultation which was the proposed purchase and regeneration of the Old Lampworks in Rodney Place (Planning Application 16/P3738) - an area which is almost entirely excluded from the plan you outline (exceptions are noted below). Attached are a copy of the concerns we raised in October, which in summary are right to light, disturbance/overcrowding, loss of privacy, the proposed houses do not fit the look & feel of Rodney Place and historical significance.	Design	Planning Application	In March 2017 Merton's Planning Applications Committee resolved to grant permission (subject to Seciton 106) for The Old Lampworks in Rodney Place (Planning Reference 16/P3738). The issues that you have raised were considered as part of this assessment.
025009HP	Tinnelly J&H	High Path	In relation to the 'Pre-Submission Estates Plan' we have the following comments: Building Height We respect and support your guidance on building height, in particular in respect to street width and density. e.g. That any taller buildings should be placed nearer the wide boulevard of Morden Road and in keeping with other developments on that road. We feel however that because Rodney Place is not part of the estates plan our views, right to light, building proximity & height in relation to our buildings are not being considered, and that Circle Housing are not adhering to the policies you have outlined. The Pre-Submission Estates Plan Policy EP H8 Building Heights states: (a) "The prevailing height across the estate must be lower than the heights along Morden Road and Merantun Way, but marginally higher than heights in the more sensitive areas of High Path, Abbey Road, Rodney Place" (g) "The close proximity of Rodney Place and Merantun Way create a need to respect existing low-rise development as well as retaining the most of the potential for taller buildings fronting Merantun Way. Building heights in this area must particularly respect, and be sensitive to, these constraints and opportunities".	Design	Street Network H2	Thank you for your support. Policy EP.H8 Building Heights sets out that applicants must consider the sensitivity of Rodney Place. For example section (g) "the close proximity of Rodney Place and Merantun Way create a need to respect existing low rise development... Building heights in this area must particularly respect and be sensitive to these constraints"

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026009HP	Tinnelly J&H	High Path	The proposed 3 storey townhouse opposite our house may be marginally higher but adds density in a very narrow estate, whilst a 7 storey apartment block directly contradicts your policy asking that the Rodney Place development be respected.	Design	Building Heights H8	Noted.
027009HP	Tinnelly J&H	High Path	The illustration on pg. 98 (Site analysis) highlights a negative view from the centre of Rodney Place looking west to the existing blocks. We believe that a similar, if worse, view would exist looking south if the proposed apartment block were to be developed, as well as generally taller buildings in surrounding area than the existing majority 2-3 storey blocks (with the exception of the 12 storey tower blocks). Whilst you have considered the new buildings in the estate in relation to each other, you have not considered existing buildings who are also valid council members and part of this neighbourhood, and the impact on us.	Design	Building Heights H8	In March 2017 Merton's Planning Applications Committee resolved to grant permission (subject to Seciton 106) for The Old Lampworks in Rodney Place (Planning Reference 16/P3738). The issues that you have raised were considered as part of this assessment.
028009HP	Tinnelly J&H	High Path	Streets & Passways: Policy EP H2 Street Network 3.140 (pg 106) references Mews style streets for Rodney Place. A change to the street layout would open us to additional traffic, parking problems, strangers in the area (we've already been robbed over Christmas) and general security issues which we feel is unfair as a street which is not part of the local estate.	Design / Transport	Street Network H2	Noted. The aim is for Rodney Place to integrate well with any new adjacent streets. There are no proposals to change the character of the street or alter its cul-de-sac layout. The plan show a potential change to the access to Rodney Place, from Nelson Grove road (a main estate street) to a new north-south street (a minor street) that itself could have a mews style character. This is likely to reinforce the secluded character of Rodney Place, rather than encourage more people to use it. Some changes are suggested to reinforce this point. Replace paras. 3.140 and 3.141 with new para: "Mews street style development should be reserved for shorter streets - the existing Rodney Place is a good example. Whilst Rodney Place is outside the estate boundary, better linking it into the new street pattern should be considered in order to both protect its character and improve access from it to the surrounding streets." The key to the map on p107 regarding Rodney Place shoule be amended to read: "Rodney Place potential integration into new street pattern."
030009HP	Tinnelly J&H	High Path	Illustration on pg. 111 (H3 Movement & Access) highlights a cycle/pedestrian path/flow through my back garden without any further elaboration on how or why this is propose. Similarly the illustration on pg. 122 (H6 Environmental Protection) highlights a 'green chain' towards Wandle River crossing our front garden without any further elaboration on how or why this is proposed	Design/Transport	N/A	Noted. Both diagrams are indicative: the aim of the policy is to highlight the need to improve better links, however it is not intended to advised on the definitive route. Minor modification Page 111 and Page 122 to High Path: Amend as shown Add indicative to the key for each diagram on page 111 H3 Movement and Access 122 – Analysis and planning policies High Path (beside the key for the three green arrows)
031009HP	Tinnelly J&H	High Path	We hope that you will listen to our concerns and consider them, as throughout this process we and our neighbours feel we've been ignored. In particular we urge that measurable controls are put in place to ensure that Circle Housing must adhere to the policies you've outlined.	Design	N/A	Noted with thanks.
160015HP	Veacock I	High Path	For High Path, unlike the other two ,more self contained areas, there are a multiptycty of problems and challenges which have not been properly acknowledged, and therefore not properly resolved	General	Clarion Housing Group	Noted. Clarion Housing Group have 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.
161015HP	Veacock I	High Path	Planting should ideally be of British Native plants, that will encourage native wildlife , subject to such wildife or plants / trees not being injurious to health affecting skin, breathing or toxins from accidental consumption of leaf , flower or berry. Ideally they should be managed to ensure growth is not excessive, and complementary for bloom and foliage and providing nesting and food source for birds.	Environment	Planning Application	Noted. Planning applications will be considered against the Estates Local Plan and Merton's other adopted Local Plan policies for managing development, including policy DM.02 <i>Nature conservation, trees hedges and landscape features</i> of Merton's Sites and Policies Plan, Section (f) of which states " <i>Proposals for new or replacement trees, hedges and landscape features should consist of appropriate native species to the UK</i> "
162015HP	Veacock I	High Path	We also have the internal transport and access, and the existing cut off from Meretun Way is a problem. Ideally High Path should be converted to a quiet way for bicycles and pedestrians only, with access to Merton Abbey School, The Resource (disabled persons) centre, Elim Church and Domex Office and service yard being onto a speed-limited Meretun Way, however TfL and Mayor's Office have consistently insisted that this is a relief road, without realising the development I have outlined above has altered the character and actual use of the road from its original – literally half-baked- purpose.	Transport	N/A	Noted and addressed in the Estates Local Plan. Policy HP2 <i>Street Network</i> particularly (b) seeks to retain the position of the historic street network at High Path and (f) (including Modification 13) seeks to explore street connections between High Path and Merantun Way with Transport for London. HP.3 <i>Movement and access</i> particularly (b) and (d) seek to improve the quality of access for pedestrians and cyclists.
163015HP	Veacock I	High Path	Since transfer CHMP have generally failed to provide a reasonable schedule of maintenance for common internal parts of flats, and for external parts, particulary review of upstands on rooves, gutters , rainwater goods, pointing, facias and soffit boards box gutter enclosures. They also fail to respond promptly to ingress of water and drips and overflows from water and header tanks with failed float operated valves in roof spaces. Likewise there is no greenspace management on appropriate cutting of types of shrubbery, clearance of broken tree branches and the like, which all conspire to make Merton as a whole look shabby. Tenants can inform you of the problems of actually getting competant persons to assess internal defects correctly and arrange timely remedial works, I have three items which CHMP failed to do inside our own flat (this was as a supposed quid pro quo for failure to adhere to an advised appointment to replace the garage door of the garage my mother rented – not turning up for one day without advice prior or on the day). I wont bore you with the details but suffice to say a hole in brickwork was 'repaired' with plumbers non-setting rubberised compound, and no effort to correctly affix wash hand basin in bathroom to wall at 90degrees are part of the incompetence we have to put up with. This has been compounded with the plans of CHMP to demolish and re-build the area they supposedly have responsibility for. Residents have been treated by officers, agents, and staff as less than second-class citizens in a patronising manner, and vulnerable persons have had verbal promises made by persons whom have no authority so to do. The whole procedure has been handled in a stress-inducing manner and has (in my opinion) hastened to an early death at least 4 persons nearby on the estate.	Clarion Housing Group	Clarion Housing Group	Noted. Issues relating to maintenance sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan. Clarion Housing Group response <i>"CHG place a strong focus on providing responsive, reliable services to residents and will continue investing in the communities. With regards to the repairs service CHG acknowledge that there have been problems in the past so they put an improvement plan in place that involved working with Councillors and Residents to identify areas where they needed to refocus efforts to deliver the best possible service for residents. The improvements implemented have resulted in a more consistent and better quality service with locally based delivery and dedicated surveyors for each neighbourhood."</i>
164015HP	Veacock I	High Path	The Mansion Blocks all share the generality of being predominantly four stories high	Design	N/A	Noted.

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165015HP	Veacock I		This has been compounded with the plans of CHMP to demolish and re-build the area they supposedly have responsibility for. Residents have been treated by officers, agents, and staff as less than second-class citizens in a patronising manner, and vulnerable persons have had verbal promises made by persons whom have no authority so to do. The whole procedure has been handled in a stress-inducing manner and has (in my opinion) hastened to an early death at least 4 persons nearby on the estate.	Clarion Housing Group	Clarion Housing Group	Noted. Issues relating to maintenance sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan. Clarion Housing Group response "CHG place a strong focus on providing responsive, reliable services to residents and will continue to do so"
166015HP	Veacock I	High Path	Priory Close - The first block to be built (c1953-57) , mostly on the site of larger villas, including Mulberry Cottage, the home of Lord Nelson's gardener if I read the maps correctly. Its U shape gives a light and airy view across to St Johns Church , with all flats being at lease dual aspect and maximising the south facing aspects where possible. There is scope to add mansard roof or similar cedar clad box dwelling units if the water storage tanks are replaced with modern mains-valve controlled supplies to water services in the mains flats. Similar style flats elsewhere in London (including where as part of consultation participation Stockwell Park) have had, albeit inelegantly, lift shafts built to the stairwells giving step free access to all flats. This could be done, finance by sale or market rental of the mansard units. Priory Close also overlooks the toddler play area, which is good. The roadway around the internal of Priory Close is unnamed but specified as unadopted as Priory Close – High Path The road to the north of Priory Close I had always known as Nelson Grove Road, but was renamed Rowland Way at the same time as the roads of Hayward Close and Dowman Close were extended northwards in 1977 to form the housing areas and Rowland Way is confirmed as being adopted by Merton Council Highways Department. The double height archway within Priory Close presumably allows for two flats to be larger than others within the block . Arguably it is confusing in that 4 entrances to the flats are within the internal of the U, with two stairwells to the external facing Rowland Way. One could only ask the logic of this of the original architect and their brief – more logically the entrances on Rowland Way would have been better named and numbered as a separate block name.	Design	N/A	Noted.
167015HP	Veacock I	High Path	Gilbert Close / Beckett Close - This pairing form complementary, but slightly different layouts, to the east and west of the courtyard that is the ball court for young people. Access to upper storeys for persons with disabilities or infirmities has same issues as the other mansion and low rise blocks across the existing high path estate. Again opportunities exist for providing dwelling accomodation to double or single mansard level (similar is on flats to similar style at Hatfield Mead on London Road, Morden) It is unclear if Highways department are responsible for maintainance of road surface as in their list of adopted roads they exclude a number of un-named roads across the borough but do not specifically exclude this roadway around the ball court. The garage block to the north takes advantage of the difficulties of building dwelling units adjacent to the large electricity transformer station of London Underground. The northern end of Beckett Close is determined by the access area to The Dark House (Kilkenny Tavern) on Merton High Street and other former land in private hands in Merton High Street prior to acquisition by Merton Council in the 1970s.	Design	N/A	Noted. For information, the council is not responsible for maintaining the roadway around the ball court outside Gilbert and Beckett Close but is responsible for the adopted roads within High Path (e.g. Nelson Grove Road)
168015HP	Veacock I	High Path	Gilbert Close is part built on a Congregational Church former burial ground. Beckett Close broadly on an area owned by fairground and traveller families – mostly the Bonds – Caroline Bond was killed by aircraft machine gun fire in WW2 on this site, there were also farmlands serving shops in Merton High street prior to 1955 and possibly was the site of an Italian Prisoner of War Camp during WW2.	Design	N/A	Noted.
169015HP	Veacock I	High Path	Ryder House - Broadly a block of flats facing east/west for dual aspect flats, with two stairwell cores on Hayward Close, and Two on area of named roads (arguably the East end of Rowland Way , or the , as I would say, the West extension of Nelson Grove Road, short arms to north and south form an effective [shape , with the far extensions thereof looking like elegance bay extensions, but again flat rooves suffer from the same lack of attentive maintenance. The main part of the block has an Italianate red tiled pitched roof, again the formation of mansard flats would not be impossible, along with extending the end flats over the flat rooves, to provide larger dwellings assisting with overcrowding. Much of Ryder House is built on the former repair works of Pilcher Motor Bodies (who moved to Andover in the 1950s)	Design	N/A	Noted.
170015HP	Veacock I	High Path	Eleanor House - This provides a strange duplex of flats in an L shape. The external is not unattractive but access is difficult and appears impossible to improve for persons with disabilities, one solution would be to gut internally the unit, and re-configure as duplex maisonettes instead, forming a new block a little further north on part of the parking areas and/or extending into the 'bear pit' play area, which has never,since construction with the tower blocks , been a suitable place to play, in forming a better courtyard area to the east of existing Eleanor House a better working of accommodation and space could be made at minimal disruption for a good gain.	Design	N/A	Noted.
171015HP	Veacock I	High Path	Ramsey House - The lounges of this have an elegant view over the playing fields of the primary school and although steam trains no longer puff along the railway there is external movement to be noticed. Access to the two stairwell cores is poor and the bin stores and washing areas need re-working. The roadway again is unspecified as to adoption by merton council. The verandas are the only ones on the estate to have elegant 1950s decorative metalwork on them. The four storeys only work here on high path itself because the building is set back from the road and behind a grass area, there is scope to break-out the ground floor flats as gardens, but gardens need time and maintenance which not every householder is able to devote effectively	Design	N/A	Noted. For information, High Path itself (to the south of Ramsey House, is adopted highway and the council's responsibility. The area directly around Ramsey House is not.
172015HP	Veacock I	High Path	Pincott Road - With only The Trafalgar Public house standing from the original terrace of houses, it is important that whatever is decided is desirable that such building remains as a viable business. The terrace of houses, again with Italianate Roofing, are solid, desirable and quite spacious, with space for offroad parking and rear gardens giving amenity. Quite how these were originally allocated is a mystery to me, I am sure a lot of people at the time would have liked much of high path estate to be built like these.	Design	Planning Application	Noted. The Trafalgar pub is outside and adjacent to the Estates Local Plan area.
173015HP	Veacock I	High Path	Tanner House Built quite late into the end of the 1970s what should be a good sized rooms was built unnecessarily small to my view, with a cramped form of the L Shape. But there is scope to extend at the east to build three larger flats, and with re-work of bin store, break the L and provide two separate blocks, otherwise overall I am personally unworried about the loss of this property IF a building or buildings of quality can be placed on its footprint.	Design	N/A	Noted

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174015HP	Veacock I	High Path	Mychell House Has the two commercial units built into the estate, one was a convenience store, replacing Lee's Store on the site of May Court and a replacement for WW Lamperts from Merton High Street, at present there is an office and convenience store, which I use from time to time and it is important for a retail offering on the south side of Merton High Street accessible by all persons. All flats are 2 Bed but they are smaller than other two bed units, sensitive re-construction maybe extending toward Nelson Grove Road may provide some better space and more dwellings.	Design	N/A	Noted. Policy EP.H4 <i>Land Use</i> (a) recognises the potential for commercial and community uses within a redeveloped High Path.
175015HP	Veacock I	High Path	Doel Close The former estate office – then police station, lies unused, it should be brought back into use ideally as estate hub for residents use and for caretakers /community support persons etc, or converted into residential use. Our independent representatives midway into earlier consultation were of the opinion that an estate and community centre was desirable where issues could be raised and solved promptly, our visit to Stockwell Park, an estate of similar size and density, had such, including strong local management by resident representatives, re-inforced this need, which is ignored by Merton Council and CHMP.	Design	Planning Application	Noted In February 2017 planning permission was granted for the former police office on Pincott Road to change use into a community centre. The centre will be run by South Wimbledon Community Association. Policy EP.H4 Land Use (a) recognises the potential for commercial and community uses within a redeveloped High Path.
176015HP	Veacock I	High Path	Vanguard House - Probably exemplifies some of the worse construction on the estate, small internal units, dark internal stairwell and corridor, dual entrance yet only four units per landing core – two per doorway, no access for wheelchairs to upper floors. I am afraid that demolition is the only sensible thing, and allowing nibble of the green space and trees to Merton High Street there is scope for a quality, four to three storey building in a modern (but not the brick and metal window design proposed) - a white render with flying V balconies and some vertical timber cladding should look quite good on this corner, possibly rounded into the curve.	Design	N/A	Noted
177015HP	Veacock I	High Path	Dole Close Stane Close Hayward Close Dowman Close - The houses seem acceptable as they are. Stane Close on the site of the Dog and Partridge does have a present day meaningless hump of grass in front of it. Councillors have suggested an open-air market on new proposals, this area, if re-modelled with green draining hardstanding could be suitable as it is. Houses themselves too small for me, presumably residents are happy with them. The other closes have houses built that obliterated much of the commercial side of Merton High Street. Built as replacement for houses demolished for the All Saints Estate many owners have already moved once. Some problems with the sheer busyness of Merton High Street Traffic and pedestrian usage of the estate roadways, but the use of the high street went away with new development on the similar footprint. Houses themselves too narrow for my personal use, but fairly large, and most people I know are happy with what they have, or have bought (I can quote four persons from the roads with ease). It appears proposed replacements are planned for Abbey Road, but we on Abbey Road do not want to move from our existing area and its present landscaping. There is scope to extend north and south to similar style the houses in these roads by a couple of properties in each direction, if one does not mind loss of housefoot print greenspace.	Design	N/A	Noted.
178015HP	Veacock I	High Path	Merton Place - Duplex Two Bed Maisonettes, a little small, but function well, the large steps up and building on higher ground presumably reflects the pile of Nelson's Merton Place allegedly on this site, and possibility of the former moat of the house running under the foundations thereof.	Design	Planning Application	Area is located in Merton Place Archaeological Priority Area therefore any developer will be required to investigate with a qualified archaeological expert. In addition Policy EP H1 (d) references the need to highlight local history particularly Lord Nelson
179015HP	Veacock I	High Path	De Burgh House - Raised on its plinth for no real reason that I can understand, slightly small one bed flats have little to commend them, as long as replacement can be no greater than 3 storeys on Nelson Grove Road and 4 storeys to a facing of Hillborough Close then if parking, amenity and a way around the plane trees to the north solved there is little that could be worse. Ideally where possible sound tiles, bricks, metalwork and timbers should all be set aside and re-used on the grounds of saving the earth's scarce resources.	Design	N/A	Noted.
180015HP	Veacock I	High Path	Will Miles Court - Its own little community of flats, in desperate need of proper painting to timberwork and front doors. No one wishes to move from there, the last units on the estate to be built, almost as an afterthought, but still leaving space for Merton High Street to be widened.	Design	N/A	Noted.
181015HP	Veacock I	High Path	Hillborough Close – internals see Norfolk House. - Biggest problem is outlook is mostly to the north over not a lot, bedrooms and lounges face south, which is generally good. Solid construction, completed earlier just after Merton Place. Has Block and Brick construction throughout, cavity wall and roof insulation in loft space of tiled pitched roof. Possibly build mansard flats into roofspace if water tanks relocated.	Design	N/A	Noted.
182015HP	Veacock I	High Path	Norfolk House - Good, some 2 beds have triple aspect flats, spacious internals, 2msq (7m ²) approx ground floor storage, 2msq (6m ²) external storage on 2 beds, 3m ² on 1 beds). 1 Beds have internal built-in bedroom wardrobe and plenty of storage space. Separate kitchens mean easy to entertain with guests overnighting in lounge if required. Original space heating Coal fire with back boiler to immersion heater – quite efficient some have back radiator to a bedroom. Design could have been better but overall 16foot by 12ft lounge beds 12ft by 12ft and good sized kitchen/diner with plenty of coat hanging etc space in hallways. Difficult to find larger flat in any purpose built block private or council house anywhere in South London or Surrey. Delays in completing original construction from 1959 to 1962 possibly led to some concrete failure by assured by Mr Harold Turner of Merton Housing Department in the 1980s this was	Design	N/A	Noted.
183015HP	Veacock I	High Path	Lovell House - Tile hung in 1960s style with black brickwork not unpleasant to view, 3 Bed maisonettes, 2 bed flats, seem spacious enough to be desired on a regular basis, definitely better than adjoining new build. Could build in same style town house 5 bed to the north of the block without loss of amenity.	Design	N/A	Noted
184015HP	Veacock I	High Path	Garage space- best turned over into a community land trust for novel affordable housing solution OR if no extension to Lovell House, create 4 multi-generational units using part of existing sheds space and shared pavement over some grass area. Reprovide Flat sheds in flat gardens.	Design	Planning Application	Noted. In March 2017, Merton's Planning Applications Committee resolved to grant planning permission (ref 16/P3738) submitted by Clarion Housing Group to provide new homes on the garages and adjacent site (Old Lamp Works).

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185015HP	Veacock I	High Path	Overall Hillborough , Norfolk and Lovell are rarely considered as part of High Path estate,	Design	N/A	Noted.
186015HP	Veacock I	High Path	Tower Blocks - Cracking to concrete external faces appears no more than surface stress cracks are not important, give the external a wash down to improve. Some damage to roof from where cradles for double glazing installation works were hung. From a distance, including Wimbledon Hill Road and roads up Wimbledon hill and Alexander Road, these identify home, externally not displeasing having interesting mosaics to murals to fronts. Improvements – build and sell two off penthouse glazed flats to roof level provide ground floor conseiege space and convert side accesses to storage areas to community uses, storage for gardening materials, coffee room, table tennis room etc. Like all tower blocks the ground floor areas attract gale force winds from the generally prevailing westerlies. All replacement buildings should have wind flow modelled to ensure not to excess to detrement of persons or chattels. Noted that original kitchen units not as well built as say Norfolk House , drawers have hardboard bottoms rather than plywood for example. Noted that as vacant units pass back to CHMP kitchens , bathrooms and flooring are replaced, wether needed or not it seems. As built space heating by means of gas-fired warm air system (not communal) didnt work (my Grandmother and Cousin have lived in these blocks in the 70s and 80s) , so darned cold in winter, less so now conventional central heating and double glazed. Kitchens smaller and dont work as diners but replacement properties seem little gain for the pain involved, unless good justification on estimated physical life left less than 40 years seems to be no point replacing with anything that does not look as nice. 6 Flats on a core level works well, if you like that few internals, one would not like to live in any of these, nor there replacement (but then I don't like the listed Barbican development of similar age nor new build at Chelsea Harbour – private or social flats) he staggering across the centre of the estate is interesting view	Design	N/A	Noted.
187015HP	Veacock I	High Path	General - It is important that the Scheme developer provide dimension details of all of the flat & house types including areas of usable loftspace, gardens correctly measured , sheds where not in gardens, and all internal space including integrated storage space of the foregoing to the inspector for independent review of the assertion that replacement properties will in fact be larger than each flat they seek to replace and that the same amount of storage and dwelling space be provided.	Design	Planning Application	Noted. The role of the Planning Inspector will be to examine the Estates Local Plan; not the particularl proposals by Clarion Housing Group. In planning terms new dwellings will be expected to comply with or exceed current space standards in place at the time of the planning application.
188015HP	Veacock I	High Path	It is also contended that new properties will be easier to heat. As all of the existing have insulation in roof spaces where there are pitched rooves, most have infilled cavity, and all tenanted properties have double glazing. The only improvement would be if all rooves were pitched and insulated (admittedly today one would build with purldeck insulation to flat rooves which existing do not have- they could be retrofitted), triple glazed and solar panels contributing to space heating.	Environment	Environmental Protection H6	Noted and addressed in Policy EP.H6 Environmental Protection. Section (h) (iv) echos the London Plan 2016 and Merton's Core Planning Strategy by stating that new " <i>development should demonstrate energy efficiency improvements at each level of the Mayor's Energy Hierarchy when compared to the existing buildings on the estate</i> ": building fabric first before district heating or renewables. Seciton (v) of the same policy goes into more detail to require proposals to provide suitable comparisons between existing and proposed developments in order to fully demonstrate the expected sustainable design and construction improvements: avoidance of internal overheating; efficient use of natural resources (including water), minimising pollution; protection of biodiversity and green infrastructure and sustainable procurement of materials.
189015HP	Veacock I	High Path	Garages could be built over using YMCA Y Cube design, would enhance area – see Eastfields development already completed we could have housed 12 families by now over all the talking we have had.	Design	N/A	Noted
190015HP	Veacock I	High Path	Extremely confusing having block of flats and a road having same name. Someone needs to rename one of them. Brexit Close would be topical...	Other	N/A	Noted. Responsibility for road renaming is outside the remit of the Estate Local Plan but is carried out by the council in consultaiton with the emergency services to avoid confusing or duplication of nameplaces. More information can be found here: www.merton.gov.uk/streetnumberingandnaming
191015HP	Veacock I	High Path	Road requires resurfacing – is listed as adopted road – as patchwork repairs have failed and do not direct rainwater to existing drains correctly.	Other	N/A	Noted. Responsibility for adopted road maintenance is outside the remit of the Estate Local Plan but will be raised with the Highways Safety Inspectors.
192015HP	Veacock I	High Path	Abbey Road - ...new build does not comply with regulations and conditions , particulary on disabled access. Better to acquire and demolish if a comprehensive build to the area is imperative.	Design	N/A	Noted
193015HP	Veacock I	High Path	Kelmscott House - Better to acquire and put into plan area if a truly comprehensive plan is desired, otherwise little justification for demolish and rebuild of Lovell or Norfolk House.	Design	N/A	Noted. Kelmscott House is outside but adjacent to the Estates Local Plan boundary.
194015HP	Veacock I	High Path	Rodney Place -The loss of the curved road isolating the cottages is to be missed and people here use the garages as the small cul-de-sac has little safe parking access. If one is soley talking about building, then the presence of the houses to the east end precludes efficient re-development of Lovell House site, however under the present plans – which could be enhanced existing if Lovell House is retained as is, a large area of potential private greenspace which could be good for wildlife.	Design	N/A	Noted. Rodney Place is outside but adjacent to the Estates Local Plan.
195015HP	Veacock I	High Path	Nelson Grove Road - In truth the planning permission should never have been granted for 1 Nelson Grove Road, built on greenspace on the last undeveloped land of highpath – the pub garden had been part of an orchard from and onwards from Nelson's Merton Place lands. Its amenity and waste space depended on access over roadway to Lovell House Garages, which was not in the public road network, therefore there are unsightly recycling boxes and large Eurobin to the front concrete area, the eurobin is frequently overflowing with bin bags and polystrene as tenants move in and out... Merton Evangelical (Baptist) Church is postally Rodney Place, it is	Design	N/A	Noted. The role of the Inspector in examining the Estates Local Plan will not involve the legal consideration of previous property transactions.

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196015HP	Veacock I	High Path	Navigation and signage - A criticism of the existing is difficulties in finding ones way around, and walkways that are designed inducing fear of crime. These problems can be overcome without wholesale demolition of the site. I have already stated that duplication of Hillborough Close is confusing, but many signs, and noticeboards provided by CHMP are in the wrong places and not viewed by residents, nor are easy to read at a distance by vehicle drivers, or pedestrians. The choice of white lettering on an orange background is unreadable, most signs are too small and located on flanks which do not face where the need to see them is.	Design	N/A	Noted. The Urban Design principles (Estates Local Plan part 2) and policies HP1 (townscape) HP2 (street network) and HP3 (movement and access) all contain elements to help improve the legibility and sense of safety of the area.
197015HP	Veacock I	High Path	The use of brick is not exclusive, the key contrast of stonework natural and cast concrete is a feature of window lintels and cills along with some dash rendering and painted surfaces. The natural development would be one of terraced housing (with the problems of on-street parking), and provision of differing sizes would be welcome for families, but it is only the 1 Bed flat that is really suitable for smaller households and single persons – sharing in multiple home situations is not dignified when there are plenty of options in the area for those that form living. Overall the honey yellow stock brickwork with the odd banding contrast works well, Lovell House is different, but on its own is not displeasing to the eye, but increasing the mass too much and fitting 'sad eyes' window shapes does not work at all well, the mix of brick and concrete in the existing towers work well as external finishes, and indeed are similar to chequerboard finish of some mansion blocks in the Victoria area of London. The red brick mansions work well – because of the bond, white narrow pointing and depth of bricks used they trick the eye into reducing the height and mass of the blocks, it is good visual design and should be followed through, with improvement, in any new build.	Design	N/A	NOTED. The vision statement for High Path on para 2.34. Although the ELP does specify this level of detail, we expect design codes to be developed by the applicant as per detailed design guidance in Part 04. Details will be assessed at planning application stage and we will welcome further comments at this time.COMMENTARY ON MANSION BLOCK APPRECIATION?
198015HP	Veacock I	High Path	Overdevelopment - As proposed the scale and mass in brutalist shape (if not style) appears to be excessive for the area. We are suburban Zone 3, not a central location, and our roots remain in Surrey as much as London. The key has to be that buildings are properly 'set back' from most of the main roads, to maintain airspace, and to ensure a feeling of claustrophobia does not occur. Enclaves of enclosed doorways around courtyards should be avoided. Ideally garden squares similar to Belgravia could be created with a variety of dwelling types behind the facings. Blockwork built can be quick to construct, and provided disabled access can be maintained there is a possibility of up to four storeys plus mansard being the ideal type across the main part of the estate.	Design	Clarion Housing Group	Clarion Housing Group response "As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed. Residents needs and priorities have been the focus of our consultation and engagement with residents since 2013. The layout of replacement homes is not yet determined but houses will be capable of being built either as open plan or with separate kitchens and living space. Where the design allows bathrooms will have windows but the priority will be to provide natural light and ventilation to habitable rooms."
199015HP	Veacock I	High Path	The biggest problem is that there have not been a limited range of options brought forward and assessed in public or presented to the residents, this should be done rather than ram-roading through one single option. Housing Associations must take as their priority the affordability of housing those in greatest need, while respecting those whom have bought under right to buy having respect in their property, but providing assistance when the likes of maintaining ones garden or externals to ensure a good and pleasing environment.	General	Clarion Housing Group	Clarion Housing Group "A Case for Regeneration has been prepared and this demonstrates that the comprehensive regeneration of the Estate is the most sustainable option, and this has taking into account surveys of the existing building stock as well as consideration of issues such as environmental performance, housing need, urban design, sustainability and economic viability. CHGs residents offer allows for the replacement of leasehold and freehold homes with homes of the same type designed to a modern standard and layout."
200015HP	Veacock I	High Path	Affordability of New Build - Although some of my ideas may be an uncosted expensive wish list, it is still imperative that any build for rent must be at an affordable level. We cannot lift the drawbridges of quality affordable homes for the working man that we and our parents enjoyed in the properties that did replace some old, tired and substandard properties let at insecure tenancies with rents that could rise without control, and we must ensure new generations have that embedded into the new build that 100% must be affordable, there should be no aim in the High Path development to seek to cross-subsidise other parts of the Scheme Promotors portfolio. Rents should be set at affordable levels for new numbers of flats, but at no greater levels than existing for replacement units. For Freeholders, many have affordable properties, they own, outright, as they stand, their domains or have already in place finance for the limit of what they could afford to pay. In no way should they be undervalued or the theft of their landscape be compromised.	General	Clarion Housing Group	Noted. For existing residents details of the offer sit with Clarion Housing Group. For new residents of affordable homes, rental levels will be considered within development viability for each planning application but set with the tenant and the social housing provider within the context of the affordable housing regime that applies at the time that the tenant moves in.
201015HP	Veacock I	High Path	Lack of Alternative Proposals with regard to Externals - I have already mentioned this in respect to consultation events. My personal dislike of the kind of building happening in the likes of Colindale/Hendon airport knows no bounds. The completed style at Wimbledon Chase is OK in small doses, but not in the main. Key points must be Kitchens to have external windows with natural daylight – this is important for herbs on the window cill and use of sunlight to dry dishes.	General	Clarion Housing Group	Noted. The exact details of new build residential accommodation layout will be dealt with at the planning application stage. Clarion Housing Group response "As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed. Residents needs and priorities have been the focus of our consultation and engagement with residents since 2013. The layout of replacement homes is not yet determined but houses will be capable of being built either as open plan or with separate kitchens and living space. Where the design allows bathrooms will have windows but the priority will be to
202015HP	Veacock I	High Path	Commercial - Where commercial development is proposed, business rents should also be set at affordable levels for retail and office and manufacturing functions (we still make stuff in merton – nearby - ovens, staircases, ductwork for restaurants and hotels to name just three). This was promised as an aim in Wimbledon Forum by Councillor Andrew Judge in 2016 that Merton would seek to promote, and this must be included in any new build for commercial classes.	Other	N/A	Noted. The rental levels of future business premises will be set by the landowner. While Merton Council support's the London Plan 2016's policies (chapter 4) of providing affordable rent for small shops, this is usually only viable when considered as part of a larger shopping centre.
203015HP	Veacock I	High Path	I would request that all materials produced by the Scheme Promoter and The Scheme Developer for public display be forwarded to the inspector for them to draw their conclusions as to fitness for purpose and ask if the reasonably educated man could comprehend what was being put in front of them. Additionally all briefing notes internally (excluding costings) between CHMP, Merton Council, All Councillor and opposition missives to residents, Minutes of meetings with residents representatives and scope of terms of engagement of independent representative and all correspondence subsequent by email or otherwise between Newman Francis and CHMP and/or Merton Council be provided to the planning inspector. Additionally all briefings to appointed public relations advisors to the schemes be provided to the inspector, for reasons of understanding choice of wording.	General	N/A	Noted. The role of the Planning Inspector will be to examine the Estates Local Plan The Planning Inspector will have access to all materials produced by Merton Council relating to the Estates Local Plan and submissions of residents, community groups, Clarion Housing Group and others relating to the Estates Local Plan. The Inspector will not be making decisions on the particular proposals put forward or the consultation undertaken by Clarion Housing Group.
204015HP	Veacock I	High Path	Key to this is that High Path estate should not be the cash cow for funding other areas. Our profits arising from capital development in part belong pro-rata to existing freeholders, and no corners cut to overdevelop or build undersize removing space from existing residents to feed funds to elsewhere should be permitted. Development should be to quality, with no compromise to the space or structure many of our residences have at the present time	General	N/A	Noted

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Reference	Consultation's Responder	Estate	Comment	Policy Area	Policy	Officer Response
205015HP	Veacock I	High Path	Offer and Comparison to Compulsory Purchase Procedures - I speak as having an interest in a leasehold interest , so this is my main area of concern, although similar applies to outright freeholders and service charge paying freeholders and tenants too would have some concerns.	Clarion Housing Group	General	Noted. Clarion Housing Group's specific offer to residents and matters of Compulsory Purchase would be considered at a Compulsory Purchase Order hearing
206015HP	Veacock I	High Path	Alternative accommodation on the estate. Ideally we would wish to remain in Abbey Road, despite the traffic issues, and although we understand a lift can be costly my mothers present circumstances mean that would be funded under disabled grant terms with means tested contribution, aside from this we have demonstrated above that the existing flat just about meets our needs, but only to the extent that the external storage is retained , the opportunity to rent a garage – indeed it is unfairly prejudicial to tenancy types that a for historic reasons a family may have had a house with integral on plot garage, when the original offer of accommodation to ourselves was one of a flat with the possibility of garage to rent – which we have so done since 1968 and the completion of DeBurgh House, and the provision of charge-free parking space on first come first served basis, this provides the initial package of minium like for like. As I have previously made clear in terms of a replacement home any reduction in the existing floor space including all integral and external storage areas within the demised lease will not be accepted, nor any reduction in the running length of any wall or reduction in door aperture width or height including any wall or window space above doors. We will also not accept any enclosed common parts entrance lobby, and although ground floor might be nice, we are currently on the first floor, which gives a good compromise for looking over external areas and roads and generally being nose neighbours participating in community activities. Additionally no window to be smaller than existing (and, for reasons of privacy) no larger than 10% of existing and none other than lounge window to be to floor level , this is to maintain the wallspace which we use for shelving and storage, finally no reduction in the running length of window cills (for our cat's perch and plant pots) nor reduction in the size of kitchen cupboards – ideally we would like to move the existing to any new accommodation. Naturally as the move is at the behest of the Scheme Developer all fitments in existing property to be in prompt and workmanlike manner to be uplifted moved with all care and attention throughout and re-provided in the new property.	Clarion Housing Group	Clarion Housing Group	Noted. Details of the tenant offer sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan. Clarion Housing Group response " <i>The Estates Local Plan will ensure that replacement homes are built to modern standards. The Development Plan comprises more than just the Estates Plan. It also includes the London Plan, Core Planning Strategy, and Sites and Policies Plan. Collectively these documents include policies which will ensure that the regeneration delivers housing choice and quality, including in relation to inclusive access. As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed.</i> " <i>The Residents Offer has been a separate process and does not form part of the Estates Local Plan ."</i>
207015HP	Veacock I	High Path	Funding , although we see no reason to pay more for replacement accommodation given the block , brick , filled cavity , double glazed, pitched tiled roof construction of our existing we struggle to see any enhancement over this although prepared to agree to additional value in the provision of solar panels for heating and electric feed in direct to the flat or the common parts as a revenue stream credit to service charges, and for the provision of triple glazing.	Clarion Housing Group	Clarion Housing Group	Noted. Details of the tenant offer sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan. Clarion Housing Group response "As part of their planning application process, the local community will continue to be consulted, and the Estates Local Plan advises that CHG will need to consult with residents to ensure that they continue to have a say in how their neighbourhood will be developed. Residents needs and priorities have been the focus of our consultation and engagement with residents since 2013. The layout of replacement homes is not yet determined but houses will be capable of being built either as open plan or with separate kitchens and living space. Where the design allows bathrooms will have windows but the priority will be to provide natural light and ventilation to habitable rooms."
208015HP	Veacock I	High Path	Funding Offer – having noted the foregoing, if it is considered that a replacement property has an additional value beyond the £££ value agreed for the property being relinquished one accepts that the lien or charge on the property at the staircasing years proposed by the scheme developer are not unacceptable as long as it is clear that the scheme developer bears the % risk in the event of net sale proceeds of a replacement property being less than the agreed value at the time of grant of new lease or freehold, and that a transfer of lease or freehold title by way of operation of law following the decease of any lessee or freeholder to any other family member by probate under a will or letters of administration under intestacy shall not be deemed to trigger a disposal for consideration requiring any payback of any equity shared claimed by the scheme developer. Now the offer is confusing in respect of if the Scheme Developers offer of Market Value + 10% for occupiers (limited to 26th May 2015 residence qualification). This has both halted potential moves within the estates to properties more suitable to a householders requirements, and given rise to a monopsony situation – the decision of the Southwark planning inspector in recognising this is welcome and to some extent we have similar (but smaller) flats to compare prices with – Falcon House from 1971 in Morden Road where a Eper Sq Ft can be used as guidance for flats, Victory Road post war re-build for houses in Pincott Road are good examples. Values of flats already sold are not necessarily good guidance as this may have been sold under stressful duress following specific family needs. I note deceased occupier ground floor maisonette is currently being offered at £325,000. which seems a little low as one is undercertain what rear garden is included, the size and layout is also smaller by about 6msq of useable space to compared to my mothers. To some extent that price is calculated on a 4.5% gross rental yield at £1200 per month rental and obviously is discounted as should for example my other family members buy that property they are excluded from the Scheme Developers' offer, this is of course unfair on the family members of that seller, they are getting less than the market value, even if they sell at MV+10% because we cannot calculate a fair market value with no development planned, one could expect, given that smaller new builds being offered at 1 bed nearby at £499,000 that a two bed , adjusted for age (little work actually needs doing – I would propose a true market value of £475,000 assuming the new 1 beds actually sell for £450,000), and that anyone buying at less than £370,000 is getting a bargain deal for SW19. Now one can consider the valuation under a compulsory purchase, and it is unclear if a suitable price or deal cannot be concluded with the scheme developer, then the scheme promoter, if permitted by the Inspector may issue demolition order and subject to the land tribunal agreeing compensation value. This value would normally be the same market value, plus the 7% compensation and 3% for disturbance to the occupier, value based on the building as it stands (not 'As Originally Built per Scheme Developer Offer). However where there is a reasonable prospect of development the land occupier may be entitled to the higher amount of the development value of the land – while this normally relates to schemes of public importance and undeveloped land but we have two types of occupier here. Freehold house occupiers where the scheme developer seeks to acquire the land for the purpose of building flats for resale or let at a profit. If we take the gross value of completed building, divided over the sq ft of land acquired less the build cost we can calculate the profit, a reasonable amount of this profit should then be provided to the land owner of the acquired land. A similar rationale can be applied in equitable fairness to a leaseholder of a flat. However we have some houses that the scheme provider wishes to acquire for a park – should the calculation here to be on a development basis on the grounds that the scheme provider could reasonably develop the land for profit (such scenario being permitted under compulsory purchase order guidelines). Now, can we extend the profit amount to other leaseholders. At present, under the service charge agreement , there is an agreed fraction paid for 'estate services' where a fraction per flat or dwelling is charged on annual invoice for the expenditure incurred. Although there appears to be no specific mechanism for refund charge payers where a profit is made (example is rents received for Mobile Phone Antennas on tower block roof spaces), there appears to be no set-off to repairs to rooves, when equitably there should be, and following the logic of this any profit One must question if within the offer to tenants of white new goods in kitchens can be construed as a bribe or inducement thereby invalidating tenants responses to like or dislike the plan in accepting short term gain at the expense of pain of others of different tenure.	Clarion Housing Group	Clarion Housing Group	Noted. Details of the tenant offer sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan. Clarion Housing Group response " <i>CHG have prepared a straightforward residents offer which describes how leaseholders and freeholders homes will be replaced. Each existing home will be replaced with a comparable modern home, of the same type (apartment, maisonette or house) with the same number of bedrooms as the home had when it was built.</i> "
209015HP	Veacock I	High Path	Proof Of Applicability of Human Rights Act. - To be protected from being unfairly denied of ones interest in land is a basic part of this and one should ensure that all forms of tenancy and land holding are treated equally. This is the implication of the Southward decision. We have problems with residents whom are tenants of affected non-resident owners not having an entitlement to re-homing on the estate, which is grossly unfair, and also of the May 26 th cut-off date as we consider all whom join in our community for any reason have the offer applied to them. The Scheme Developer seeks to reduce the quantum of houses in the proposals by not providing replacement houses for those that it is acquiring prior to development on the open market not to be included in the number of houses presently available for social rent or replacement ownership. As stated it is not preferable that we are currently discriminated against the potential of acquiring a house, if it meets our needs, either pre or post development simply because when first moved here we were allocated a flat, there should be opportunity to acquire, on same shared ownership terms excluding down staircasing on the difference in price, a house , if we so desire and it is determined, against our wishes, that our existing flat be demolished, and sufficient houses for this purpose should be provided within the proposed development.	Clarion Housing Group	Clarion Housing Group	Noted. Details of the tenant offer sit with Clarion Housing Group. It is outside the remit of the Estate Local Plan . Clarion Housing Group response " <i>The Residents Offer is part of a separate process and does not form part of the Estates Local Plan.</i> "
210015HP	Veacock I	High Path	Locked In Carbon - Following From Central Hill Estate Development Calculations. https://architectforsocialhousing.wordpress.com/2017/02/02/embodied-carbon-estimation-for-central-hill-estate-report-by-model-environments/ Central Hill is an estate of about 400 properties, mostly of concrete, resulting in 7300tonnes of embodied CO2, with an estimate of 154tonnes of CO2 involved in demolition. High Path has more properties, mostly of brick, so one could assess something in the region of 14,000 tonnes of embedded CO2 and 280tonnes of CO2 = 14,280. Adding in CO2 required for new build is going to be similar, slightly more if window frames are proposed as extruded aluminium, so magnitude total 26,000tn for 600 replacement dwelling. Now the average household is estimated to use for space heating about 1.7885 tonnes pa, allowing for 25% reduction in new build this would be 1.35tn per annum . Assuming 600 households this amount of CO2 is equivalent of 22 years of household use a, actually the saving of 25% is .44tn, which for 600 housing units is a payback period of 96 years.	Other	General	The Estates Local Plan has been the subject of a sustainability appraisal and an equalities impact assessment to assess matters covered by the Estates Local Plan against social, environmental, economic and overall quality of life issues and matters covered by equalities legislation. Matters relating to the specific residents offer from Clarion Housing Group to residents are outside the remit of the Estates Local Plan. Should compulsory purchase be considered, this process would be through a separate enquiry where the residents offer, residents' views of it, Clarion Housing Group's response; affordability and other matters would be considered. At Southwark the decision referred to here was part of a Compulsory Purchase Order examination in public.
211015HP	Veacock I	High Path	Locked In Carbon - Following From Central Hill Estate Development Calculations. https://architectforsocialhousing.wordpress.com/2017/02/02/embodied-carbon-estimation-for-central-hill-estate-report-by-model-environments/ Central Hill is an estate of about 400 properties, mostly of concrete, resulting in 7300tonnes of embodied CO2, with an estimate of 154tonnes of CO2 involved in demolition. High Path has more properties, mostly of brick, so one could assess something in the region of 14,000 tonnes of embedded CO2 and 280tonnes of CO2 = 14,280. Adding in CO2 required for new build is going to be similar, slightly more if window frames are proposed as extruded aluminium, so magnitude total 26,000tn for 600 replacement dwelling. Now the average household is estimated to use for space heating about 1.7885 tonnes pa, allowing for 25% reduction in new build this would be 1.35tn per annum . Assuming 600 households this amount of CO2 is equivalent of 22 years of household use a, actually the saving of 25% is .44tn, which for 600 housing units is a payback period of 96 years.	Environment	Environmental Protection HG	Noted and addressed in the London Plan 2016 policy 5.15, Merton's Core Planning Strategy policy CS15 Policy EP.H6 Environmental Protection. Section (h) (iv) echos the London Plan 2016 and Merton's Core Planning Strategy by stating that new " <i>development should demonstrate energy efficiency improvements at each level of the Mayor's Energy Hierarchy when compared to the existing buildings on the estate</i> ": building fabric first before district heating or renewables. Seciton (v) of the same policy goes into more detail to require proposals to provide suitable comparisons between existing and proposed developments in order to fully demonstrate the expected sustainable design and construction improvements: avoidance of internal overheating; efficient use of natural resources (including water), minimising pollution; protection of biodiversity and green infrastructure and sustainable procurement of materials.

SD.6a Schedule of representations received to pre submission publication (stage 3) of Merton's Estates Local Plan December 2016 - February 2017 including officer responses

Alphabetical order by representor

Reference	Consultation's Responder	Estate	Comment	Policy Area	Policy	Officer Response
004009EP	Ward Gethin Arthur	High Path	We act for a proposed purchaser of the above property and our Local Authority search has revealed a proposed route of a new road within 200 metres of the above property. We should be grateful if you could let us have further information regarding this including a Plan showing the proposed route and its impact on the property.	General	N/A	N/A

Residents' involvement in the management of estates

The ongoing management of the estate is vital to its sustainability.

Residents should have the opportunity to participate in the ongoing management of the regenerated estate. In some