



Main Modifications
Estates Local Plan
Sustainability Appraisal

September 2017



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This report has been prepared using the evidence base provided by the London Borough of Merton. The conclusions and recommendations contained in this SA Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by Jam Consult Ltd has not been independently verified, unless otherwise stated in the Report.

The work described in this Report was undertaken between 6 September 2016 and 20 September 2017 and is based on the information made available during the said period of time. The scope of this report and the services are accordingly factually limited by the timescale available. It is recognised that further information may become available after this report has been published, which may need to be considered in any further work undertaken.

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Non-Technical Summary

N.1 Introduction

This document provides a [Sustainability Appraisal \(SA\)](#) of the London Borough of Merton's [Main Modifications Estates Local Plan \(ELP\)](#). Once adopted, the [ELP](#) will be part of Merton's Local Plan, which collectively will provide the detailed planning and design guidance for the regeneration of the Eastfields, High Path and Ravensbury Estates over the next 10 to 15 years.

[Jam Consult Ltd](#) has been commissioned by the London Borough of Merton to undertake the [SA](#) following a review of the Sustainability Appraisal process and reports that have been prepared in relation to the [Estates Local Plan \(ELP\)](#) between 2014 and 2016. The SA seeks to rectify any flaws in the SA process that have been identified and respond to comments made on the Scoping Report 2014, Issues and Options SA 2014; Draft Estates Local Plan SA Report February 2016; Submission Draft SA Report November 2016; Submission Version SA March 2017; and the Main Modifications September 2017.

[This report provides an update to the Submission Version SA, March 2017 and takes into account the main modifications that are proposed to the ELP following the Examination in Public, which was held between 4-6 July 2017.](#)

N.2 Background to the Estates Local Plan

Clarion Housing Group (Clarion) acquired the ownership and management of the Estates in 2010 as part of a Housing Stock Transfer Agreement (HSTA) containing all the Council housing stock within Merton, totalling circa 9,500 units. Clarion is the majority landowner of the estates, owning about 60% of the three estates. Clarion will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes.

In September 2014, near the start of the project, the Council jointly signed up to the following list of 10 commitments with Clarion to ensure residents get the best out of any regeneration proposals for the three estates:

1. Clarion will consult with residents, consider their interests at all times, and address concerns fairly.
2. Current homeowners will be entitled to at least the market value of their home should they wish to take the option to sell their home to Clarion.
3. Current tenants will be entitled to be rehoused in a new home of appropriate size considering the number of people in the household.
4. Existing Clarion tenants will keep all their rights and have the same tenancy agreement, including rent levels, in the new neighbourhood as they do now.
5. All new properties will be more energy efficient and easier to heat than existing properties, helping to keep down residents' fuel bills.
6. Clarion will keep disruption to a minimum, and will do all it can to ensure residents only move once if it is necessary to house them temporarily while their new home is being built.
7. Clarion will offer extra help and support for older people and/or disabled residents throughout the regeneration works.
8. Clarion will continue to maintain the homes of residents across the three neighbourhoods throughout the planning process until regeneration starts, including ensuring a high quality responsive repairs service.
9. Any growth in the number of homes will be in accordance with the Council's Development Plan so that it is considered, responsible and suitable for the area.
10. As a not for profit organisation, Clarion will not profit from any regeneration and will use any surplus to provide more housing or improve existing neighbourhoods.

N.3 The Estates

Details of the individual estates are as follows:

Eastfields

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

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

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

High Path

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

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

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

Ravensbury

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

The Estate area totals approximately 4.42 hectares. The Estate currently comprises 192 dwellings, including houses and flats across a mix of tenures including private ownership (as a result of right to buy) and social rent, including a mixture of semi-detached and terraced houses, flats and maisonettes. Surrounding the residential properties are areas of amenity grassland, informal planting beds, scattered semi-mature trees and hard standing consisting of pavements, roads and car parking. There is also a small community facility of approximately 140 sqm.

In addition, at the southern corner of the site there are a number of garages that are in disrepair and are not in use, these are currently under the ownership of LBM.

N.4 Why is a Sustainability Appraisal needed?

Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.

When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.

Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the '[National Planning Policy Framework \(NPPF\) 2012](#)' and '[National Planning Practice Guidance \(NPPG\)](#)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

N.5 The Sustainability Appraisal (SA) Process

The NPPG sets out the stages that should be followed when carrying out a Sustainability Appraisal in relation to the plan preparation as set out below.

Sustainability Appraisal Stages	ELP Preparation
STAGE A: SCOPING REPORT	
A1: Identify other relevant plans, programmes and sustainability objectives	Evidence gathering and engagement
A2: Collect baseline information	
A3: Identify sustainability issues and problems	
A4: Develop SA framework, including objectives, indicators and targets	
A5: Consult the consultation bodies on the Scope of the SA report	
STAGE B: DRAFT SUSTAINABILITY REPORT	Consult on draft ELP
B1: Test the plan objectives against the Sustainability Appraisal framework	
B2: Develop the plan options including reasonable alternatives	
B3: Evaluate the likely effects of the plan and alternatives	
B4: Consider ways of mitigating adverse effects and maximising beneficial effects	
B5: Propose measures to monitor the significant effects of implementing the plan	
STAGE C: PREPARE THE SA REPORT	Prepare the publication version of the ELP
C1: Prepare the Sustainability Appraisal Report	
STAGE D: CONSULT ON THE SA REPORT	CONSULT ON THE ELP
D1: Consult on the draft plan and SA Report	Submit draft ELP and supporting documents for Examination
D2: Assess any significant changes as a result of the consultation	Outcome of Examination - consider implications for SA
D3: Finalise Sustainability Report	Estates Local Plan Adopted
STAGE E: POST ADOPTION REPORTING AND MONITORING	Monitor and Report on the implementation of the ELP
E1: Prepare and publish post-adoption statement	
E2: Monitor significant effects of implementing the plan	
E3: Respond to adverse effects	

N.6 Equalities Impact Assessment

The Equality Act 2010 replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it's unlawful to treat someone. Before, the Act came into force there were several pieces of legislation to cover discrimination, including:

- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995

At the decision making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics' - which includes the following:

- Age
- Disability
- Sex/Gender
- Race or belief
- Religion
- Sexual Orientation
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity

- 1.6.3 As with the SA the EqIA has informed and influenced the development of the Plan towards adoption. A specific indicator on Diversity and Equality has been added to the SA Framework to ensure that equalities issues are identified, although there will be an impact within many of the Sustainability Objectives, for example, housing, social deprivation, health and wellbeing and access to services and facilities. The EqIA results are provided in [Appendix A9](#).

N.7 Health Impact Assessment

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

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

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

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

N.8 Habitats Regulations Assessment

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

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

Habitats Regulations Assessment Screening

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

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

N.9 What is this document?

This document provides the [Sustainability Appraisal \(SA\)](#) of the Main Modifications ELP and updates the SA to take into account any changes to the policies in the Plan that were identified as necessary during the Examination Process. The document assesses three new overarching policies that have been included in the ELP against the SA Framework and the EQiA. The new policies include: [OEP1 Vision](#), [OEP2 Strategy](#) and [OEP3 Urban Design](#). The update also considers any further minor modifications to the ELP and corrects any minor errors that have been identified.

N.10 Previous Stages of the SA

Scoping Report, September 2014

The Scoping Report (**Stage A**) sets out the context and scope of the SA in accordance with the regulations and best practice guidance. An initial Scoping Report was prepared for the Core Strategy, which was published for consultation and set out the proposed methodology for the SA. The Core Strategy SA framework was therefore used to inform the Scoping Report for the SA of the ELP, issued in September 2014, as recommended by guidance. The full report can be accessed on the Council's website at <http://www.merton.gov.uk/estatesplan>

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

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

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

The results of the consultation can be found in [Section 3.6](#) of this report. The full responses are provided on the Council's website.

Issues and Options SA Report, September 2014

An SA Report of the Issues and Options for the Estates Local Plan (**IOELP**) was issued for consultation in September 2014. Responses were received from the statutory consultees and a total of 283 responses were received from residents of the estates during the consultation period. The full responses can be found on the Council's website <http://www.merton.gov.uk/estatesplan> and a summary can be found in [Section 3.6](#) of this report.

Draft Estates Local Plan SA Report, February 2016

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

Further details are set out in [Section 3.6](#) of the SA report and the full responses can be found on the Council's website at <http://www.merton.gov.uk/estatesplan>

Submission Draft Estates Local Plan SA Report, November 2016

The Submission Draft SA Report was prepared in November 2016 and issued for consultation between December 2016 and February 2017. A total of 270 representations were received from 41 respondents, which have been considered in the update to this report. Further details are set out in [Section 3.7](#) of this report. A summary of the responses can be found in Appendix A10 of this report and the full responses can be found on the Council's website at <http://www.merton.gov.uk/estatesplan>

The Submission Version of Merton's Estates Local Plan and SA Report were submitted to the Secretary of State on the 31 March 2017, and considered at an Examination in Public by an independent Planning Inspector from the 4-6 July 2017. Main modifications were recommended in order to make the Plan sound, which have been considered in this report.

N.11 Options considered in the development of the ELP

A number of options were considered in the preparation of the ELP, with regard to the regeneration of the Estates. The options considered included:

- Issues and Options Sept 2014 - options for the redevelopment or refurbishment of the estates, including the type of housing and facilities that were required for each estate.
- The Case for Regeneration prepared by Savills, Sept 2015 (updated October 2016) - set out the different issues and options considered for the estates, which have been used as the basis for this SA.
- Draft Estates Local Plan, Feb 2016 - the proposed policies for the plan

The options identified in the CfR were as follows:

[Option 1: Refurbishment to Decent Homes \(Merton Standard\)](#)

[Option 2: Refurbishment to an Enhanced Standard](#)

[Option 3: Full Redevelopment \(Eastfields and High Path\) / Partial Redevelopment \(Ravensbury\)](#)

The options were subject to public consultation through the Issues and Options and SA, the Draft Estates Local Plan and SA and further consultation carried out by Clarion.

As a result of the consultation on the options the following options were rejected going forward:

Do nothing - was not considered a realistic alternative as Clarion is legally bound to refurbish the condition of the stock under the provision of the Stock Transfer Agreement with the Council

Partial Development of Eastfields and High Path Estates - the option would not offer the best opportunity to deliver a high quality residential development that optimises the use of the land to deliver a high quality residential development.

Full redevelopment of Ravensbury Estate - Full regeneration of the estate would not generate a significant uplift in residential floorspace, which would mean that the combination of high site assembly costs and high costs of full regeneration would not make the option viable or deliverable.

Full details are set out in [Section 7](#) of the [SA report](#) and the [Case for Regeneration Reports 2016](#).

[The Draft Submission Estates Local Plan, 2016](#)

As a result of the representations received the Council commissioned Jam Consult Ltd to review the SA work undertaken to date in relation to the ELP, with specific attention to the selection of options. The review of the sustainability appraisals and supporting documents found there were some defects in the SA process, which needed to be corrected if the evidence base for the ELP was to be considered suitably robust when subjected to Examination in Public (EiP).

In particular, the review found the assessment of options should be revisited in respect of the representations received, with specific reference to the reasons for the selection and rejection of the 'reasonable alternatives' and the assessment of the likely significant impacts.

N.12 Selection and Rejection of ELP Options

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

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

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

At the time of writing, the Cost Benefit Analysis undertaken by Clarion highlights that all three options would result in a deficit over the 50 year business plan. However, Option 3 would deliver the greatest regeneration benefits and presents the most sensible and sustainable solution.

Option 3: Full Redevelopment Eastfields and High Path

This option was selected. The redevelopment of the estate enables the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.

Option 3: Partial redevelopment of Ravensbury

This option was selected. The partial redevelopment of the estate enables the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment would make more efficient use of the land, as well as offering the replacement of the Orlit Homes, which are of a defective type of construction. The partial redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.

[The full results can be found in Sections 7 and 8 and Appendix A5 of this report](#)

N.13 Policies considered in the ELP

As a result of the Examination of the ELP some changes have been made to the proposed policies in the revised Plan including the introduction of 3 new overarching policies: OEP1 Vision; OPE2 Strategy and OEP3 Urban Design. The SA has carried out an assessment of all of the policies, including the revisions, in order to ensure that the SA complies with the regulations and guidance.

[Section 9](#) and [Appendix A6](#) contain a full appraisal of each of the policies.

N.14 Significant sustainability effects of the ELP policies

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

The full results and proposed mitigation measures can be found in [Section 9](#) of this report and [Appendix A6](#).

N.15 Uncertainties and Risks

The Plans, Programmes and Policies as well as the Baseline Data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work that will be undertaken as part of the planning applications for development. Specific attention should be given to the uncertain impacts identified when reviewing proposals.

The specific mitigation measures will also need to be provided in more detail at the planning application stage to ensure that any adverse impacts are suitably addressed. Monitoring of the impacts will be addressed through the annual Authority Monitoring Report. A detailed phasing and decanting plan will also be required to ensure disruption to residents is minimised as far as possible.

The financial modelling work for the regeneration is on-going and the current development assumptions will be subject to review as planning applications are prepared. Further detail is still required on some elements, e.g. the costs of demolition and the Community Infrastructure Levy. Discussion are also on-going regarding the estimates of sales prices, phasing of sales and early discounting, sales rates and rental income, all of which may be affected by post-referendum uncertainty.

A high-level viability assessment of the Estates Local Plan was undertaken by BBP Regeneration in March 2017 to verify the current development assumptions. The report concluded that the Plan is considered to meet the NPPF test that the cumulative impact of the standards and policies should not put implementation of the plan at serious risk. The report acknowledges that planning obligations relating to affordable housing and other mitigation measures will need to be considered on a case-by-case basis; it has not considered the viability of specific proposals for development.

There are also risks largely outside the Borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

N.16 Next Steps

This [Sustainability Appraisal \(SA\) Main Modifications Report](#) has been published alongside the [Main Modifications Estates Local Plan](#). The documents are both available on the Council's website at: <http://www.merton.gov.uk/estatesplan>

The Main Modifications Estates Local Plan and Sustainability Appraisal will be available for consultation for a period of 6 weeks from 26 September - 7 November 2017.

If you would like to comment, representations can be made by post or email for consideration by the Planning Inspector to:

FutureMerton
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

Telephone: 020 8545 3837

Email: estatesplan@merton.gov.uk

Main Modifications
**Estates Local Plan
Sustainability Appraisal**
September 2017

1 Introduction

- 1.1 This document provides a [Sustainability Appraisal \(SA\)](#) of the London Borough of Merton's [Main Modifications Estates Local Plan \(ELP\)](#). Once adopted, the [ELP](#) will be part of Merton's Local Plan, which collectively will provide the detailed planning and design guidance for the regeneration of the Eastfields, High Path and Ravensbury Estates over the next 10 to 15 years.
- 1.2 [Jam Consult Ltd](#) has been commissioned by the London Borough of Merton to undertake the [SA](#) following a review of the Sustainability Appraisal process and reports that have been prepared in relation to the [Estates Local Plan \(ELP\)](#) between 2014 and 2016. The SA seeks to rectify any flaws in the SA process that have been identified and respond to comments made on the Scoping Report, 2014; Issues and Options SA, 2014; Draft Estates Local Plan SA Report, February 2016; and the Submission Draft SA Report, November 2016.
- 1.3 [This report provides an update to the Submission Version SA, March 2017 and takes into account the main modifications that are proposed to the ELP following the Examination in Public held from 4-6 July 2017.](#)

1.2 Why is a Sustainability Appraisal Needed?

- 1.2.1 Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.
- 1.2.2 When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.
- 1.2.3 Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the '[National Planning Policy Framework \(NPPF\) 2012](#)' and '[National Planning Practice Guidance \(NPPG\)](#)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

1.3 Background to the Estates Local Plan

- 1.3.1 Clarion is the majority landowner of the estates, owning about 60% of the three estates following Stock Transfer from the Council in 2010. Clarion will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes. Clarion, as part of the wider Circle Housing Group, is one of the largest Housing Associations in the UK.
- 1.3.2 As a result of initial stock condition surveys and financial planning work, Clarion discovered that significant refurbishment and maintenance work, as well as financial investment, was required to achieve the necessary improvements in standards. This was as a consequence of a history of reactive repairs rather than proactive or comprehensive refurbishment. Clarion therefore began a comprehensive review exercise across all their estates within the Borough to determine whether it might be more beneficial and sustainable to replace homes in the poorest condition with new properties. Consideration was given to the condition of the properties over a 50year period, which was based on the length of Clarion's financial modelling.
- 1.3.3 All the Clarion Estates in Merton were assessed to determine the impact of upgrading homes to the Decent Homes Merton Standard. This included consideration of:
- Capacity of existing stock to meet current and future housing needs e.g. overcrowding, older people, demand for adapted properties, etc.
 - Condition of the existing stock and historic / projected maintenance issues and costs
 - Community safety and reported crime
 - Indices of deprivation, including super output area level identification of areas in decline.
- 1.3.4 The above work was augmented by further reviews based on the deliverability of potential regeneration programmes on each of the estates. This review included:
- Scope for increasing the number of homes on site
 - Access and site constraint issues
 - Income generation potential and future sales values and demand
 - Contribution to future housing supply
 - Proximity to public transport and other infrastructure.
- 1.3.5 These two work streams were combined and clearly identified Eastfields, High Path and Ravensbury as the three estates within Clarion's ownership with the most viable regeneration potential. The regeneration of the estates offers the opportunity for Clarion to explore the potential for creating new, high quality and sustainable affordable housing for the people of Merton. As a result, the lives of the residents on the Estate could be significantly enhanced, by overcoming inequalities faced by those living within the existing poor quality housing. The delivery of wider regeneration benefits to the surrounding area could also be realised.

- 1.3.6 In September 2014, near the start of the project, the Council jointly signed up to the following list of 10 commitments with Clarion to ensure residents get the best out of any regeneration proposals for the three estates:
1. Clarion will consult with residents, consider their interests at all times, and address concerns fairly.
 2. Current homeowners will be entitled to at least the market value of their home should they wish to take the option to sell their home to Clarion.
 3. Current tenants will be entitled to be rehoused in a new home of appropriate size considering the number of people in the household.
 4. Existing Clarion tenants will keep all their rights and have the same tenancy agreement, including rent levels, in the new neighbourhood as they do now.
 5. All new properties will be more energy efficient and easier to heat than existing properties, helping to keep down residents' fuel bills.
 6. Clarion will keep disruption to a minimum, and will do all it can to ensure residents only move once if it is necessary to house them temporarily while their new home is being built.
 7. Clarion will offer extra help and support for older people and/or disabled residents throughout the regeneration works.
 8. Clarion will continue to maintain the homes of residents across the three neighbourhoods throughout the planning process until regeneration starts, including ensuring a high quality responsive repairs service.
 9. Any growth in the number of homes will be in accordance with the Council's Development Plan so that it is considered, responsible and suitable for the area.
 10. As a not for profit organisation, Clarion will not profit from any regeneration and will use any surplus to provide more housing or improve existing neighbourhoods.
- 1.3.7 The Draft Estates Local Plan was published for consultation in February 2016. Following the responses to the consultation, the Council prepared the Submission Draft Estates Local Plan and Sustainability Appraisal, November 2016 to respond to the representations received. This report is an updated version of the Submission Version in order to take into account responses to the consultation and new evidence that has been prepared; the main modifications identified through the Examination process
- 1.3.8 The ELP will form part of the Development Plan for the Borough, which contains the planning policies that guide development in Merton. The Plans should be considered as a whole and includes the following documents:
- The Mayor's London Plan 2016
 - Merton's Core Planning Strategy 2011
 - The South London Waste Plan 2012
 - Sites and Policies Plan 2014
 - Policies Map 2014.

1.4 Previous Stages of the SA

1.4.1 Scoping Report, September 2014

The Scoping Report (**Stage A**) sets out the context and scope of the SA in accordance with the regulations and best practice guidance. An initial Scoping Report was prepared for the Core Strategy, which was published for consultation and set out the proposed methodology for the SA. The Core Strategy SA framework was therefore used to inform the Scoping Report for the SA of the ELP, issued in September 2014, as recommended by guidance. The full report can be accessed on the Council's website <http://www.merton.gov.uk/estatesplan>

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

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

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

The results of the consultation can be found in [Section 3.6](#) of this report. The full responses are provided on the Council's website.

1.4.2 Issues and Options SA Report, September 2014

An SA Report of the Issues and Options for the Estates Local Plan (**IOELP**) was issued for consultation in September 2014. Responses were received from the statutory consultees and a total of 283 responses were received from residents of the estates during the consultation period. The full responses can be found on the Council's website <http://www.merton.gov.uk/estatesplan> and a summary can be found in [Section 3.6](#) of this report.

1.4.3 Draft Estates Local Plan SA Report, February 2016

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

Further details are set out in [Section 3.6](#) of the SA report. The full responses can be found on the Council's website at <http://www.merton.gov.uk/estatesplan>

1.4.4 Submission Draft Estates Local Plan SA Report, November 2016

The Submission Draft Estates Local Plan SA report was published for consultation between December 2016 and February 2017. A total of 270 responses from 41 respondents were received, which are discussed in [Section 3.7](#) of this report. A summary of the responses is provided in [Appendix A10](#) of this report and the full responses can be found on the Council's website at <http://www.merton.gov.uk/estatesplan>

1.4.5 Submission Version Estates Local Plan SA Report, March 2017

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

1.5 What is this Document?

- 1.5.1 This document provides the [Sustainability Appraisal \(SA\)](#) of the Main Modifications ELP and assesses the options and policies considered in the development of the Plan. The document provides an appraisal of the ELP in order to address concerns raised through the consultation process regarding the selection of options and policies that were presented in the Issues and Options Estates Local Plan and SA Report, September 2014; and Draft Estates Local Plan and SA Report, February 2016. The report updates the Submission Version SA report to take into account the proposed main modifications to the ELP and also corrects any minor errors that have been identified.

1.6 Equalities Impact Assessment

- 1.6.1 The Equality Act 2010 replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it's unlawful to treat someone. Before, the Act came into force there were several pieces of legislation to cover discrimination, including:
- Sex Discrimination Act 1975
 - Race Relations Act 1976
 - Disability Discrimination Act 1995
- 1.6.2 At the decision making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics'- which includes the following:
- Age
 - Disability
 - Sex/Gender
 - Race or belief
 - Religion
 - Sexual Orientation
 - Gender Reassignment
 - Marriage and Civil Partnership
 - Pregnancy and Maternity
- 1.6.3 As with the SA the EqIA has informed and influenced the development of the Plan towards adoption. A specific indicator on Diversity and Equality has been added to the SA Framework to ensure that equalities issues are identified, although there will be an impact within many of the Sustainability Objectives, for example, housing, social deprivation, health and wellbeing and access to services and facilities. The full EqIA is provided in [Appendix A9](#).

1.7 Health Impact Assessment

- 1.7.1 Although not a statutory requirement, Merton Council is carrying out a Rapid Health Impact Assessment in accordance with the Mayor of London's Social Infrastructure Supplementary Planning Guidance, London Healthy Urban Development Unit (HUDU) planning checklist and Rapid HIA tool. The London Plan policy 3.2 Improving health and addressing health inequalities (part c) states that:
- 'New development should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce inequalities.'
- 1.7.2 The purpose of an HIA is to promote sustainable development by integrating health and well-being (including mental health) considerations into the preparation of plans or strategies; by identifying the key health and wellbeing issues and the groups that are likely to be affected by the implementation of the Plan in accordance with the aforementioned London Plan policy.
- 1.7.3 The HIA will be used to assess each stage of the Plan's making process and make recommendations to mitigate identified negative impacts, to enhance the proposals or to secure a positive impact. The final HIA report will show how the final draft of the Plan will secure health and wellbeing benefits; and how identified adverse impacts in the earlier drafts of the Plan have been avoided or minimised.

1.8 Habitat Regulations Assessment

- 1.8.1 The EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna) passed in to domestic law by way of the Habitats Regulations (Conservation (Habitats &c) Regulations, 1994). As a consequence any development proposal that is not part of a specific management prescription that might have a significant effect on a Natural 2000 sites (also known as European sites) must be subject to Appropriate Assessment (AA).
- 1.8.2 Regulation 48 of the Habitats Regulations responds to the provisions of Article 6 (3) and (4) of the Directive which sets out provisions for determining whether the plan is likely to have a significant effect on the integrity of a Natural 2000 Site, including Special Protection Area, Ramsar sites (Wetlands sites) and Special Areas of Conservation.
- Habitats Regulations Assessment Screening**
- 1.8.3 The Habitats Regulations identifies Merton Council as the 'Competent Authority', which is responsible for deciding whether adverse effects are likely. The Council has consulted with Natural England, the Government's advisor in this respect. Consideration has been made of the objectives and proposals of the Plan against the conservation objectives for European sites. Whilst the screening process has determined that it is not likely that the Plan would lead to any adverse impact on the integrity of European sites, emerging issues have informed the Sustainability Appraisal:

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

2. The Estates Local Plan

2.1 What is the purpose of the Plan?

2.1.1 The Plan's purpose is to guide any redevelopment proposals for the three estates; Eastfields, High Path and Ravensbury, over the next 10 to 15 years. The Plan seeks to provide a flexible framework to guide the future regeneration of the estates and surrounding area to be used in determining the detailed planning applications for scheme proposals.

2.2 What are the Objectives of the Plan?

The ELP embodies and accords with Merton's Core Planning Strategy 2011. The ELP has therefore used the same Strategic Objectives (SOs) as set out below. A Compatibility Assessment of the Strategic Objectives against the Sustainability Objectives has been carried out, which showed that the objectives were largely compatible and is attached at [Appendix A4](#) of this report.

ELP1	To make Merton a municipal leader in improving the environment , taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
ELP2	To promote social cohesion and tackle deprivation by reducing inequalities.
ELP3	To provide new homes and infrastructure within Merton's town centre and residential areas, through physical regeneration and effective use of space.
ELP4	To make Merton more prosperous with strong and diverse long-term economic growth
ELP5	To make Merton a healthier and better place for people to live, work or visit.
ELP6	To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place
ELP7	To make Merton a well connected place where walking, cycling and public transport are the modes of choice when planning all journeys.
ELP8	To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the Borough.

3 Sustainability Appraisal Methodology

3.1 Purpose of the Sustainability Appraisal

- 3.1.1 The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of ELP and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. [Appendix 1](#) provides details of how the SEA requirements have been met within the document.

3.2 Planning Policy and Sustainable Development

- 3.2.1 The National Planning Policy Framework (NPPF) was published in March 2012. The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Planning policies and decisions must also reflect and, where appropriate, promote relevant EU obligations and statutory requirements.
- 3.2.2 The purpose of the planning system is to contribute to the achievement of sustainable development as defined in the Bruntland definition. The definition of sustainable development is also set out in the UK Sustainable development Strategy 'Securing the future - delivering the UK Sustainable Development Strategy, 2005'. The document sets out the guiding principles for sustainable development and priorities for action. The strategy sets out five guiding principles to achieve sustainable development:
- Living within environmental limits
 - Ensuring a strong, healthy and just society
 - Achieving a sustainable economy
 - Promoting good governance
 - Using sound science responsibly
- The Strategy also gives the following priorities for action:
- Sustainable consumption and production
 - Climate Change and Energy
 - Natural Resource Protection and Environmental Enhancement
 - Sustainable Communities.

3.3 The Sustainability Appraisal Process

- 3.3.1 The Sustainability Appraisal of the ELP has been carried out by Jam consult ltd in consultation with Council officers, in accordance with the relevant Regulations and Government policy and guidance, as set out below:
- European Directive 2001/42/EC (The Strategic Environmental Assessment Directive)
 - EC Guidance on the SEA Directive – Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment, September 2003
 - Environmental Assessment of Plans and Programmes Regulations 2004, Section 12
 - The Planning and Compulsory Purchase Act 2004, Section 19(5)
 - Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, Planning Inspectorate, August 2009 and update February 2010
 - Local Development Frameworks: Examining Development Plan Documents – Learning from Experience, September 2009
 - National Planning Policy Framework (NPPF), 2012
 - National Planning Practice Guidance (NPPG)

3.4 Stages of the SA Process

3.4.1 The NPPG sets out the stages that should be followed when carrying out a Sustainability Appraisal in relation to the plan preparation as set out below.

Sustainability Appraisal Stages	ELP Preparation
STAGE A: SCOPING REPORT	
A1: Identify other relevant plans, programmes and sustainability objectives	Evidence gathering and engagement
A2: Collect baseline information	
A3: Identify sustainability issues and problems	
A4: Develop SA framework, including objectives, indicators and targets	
A5: Consult the consultation bodies on the Scope of the SA report	
STAGE B: DRAFT SUSTAINABILITY REPORT	
B1: Test the plan objectives against the Sustainability Appraisal framework	Consult on draft ELP
B2: Develop the plan options including reasonable alternatives	
B3: Evaluate the likely effects of the plan and alternatives	
B4: Consider ways of mitigating adverse effects and maximising beneficial effects	
B5: Propose measures to monitor the significant effects of implementing the plan	
STAGE C: PREPARE THE SA REPORT	Prepare the publication version of the ELP
C1: Prepare the Sustainability Appraisal Report	
STAGE D: CONSULT ON THE SA REPORT	CONSULT ON THE ELP
D1: Consult on the draft plan and SA Report	Submit draft ELP and supporting documents for Examination
D2: Assess any significant changes as a result of the consultation	Outcome of Examination - consider implications for SA
D3: Finalise Sustainability Report	Estates Local Plan Adopted
STAGE E: POST ADOPTION REPORTING AND MONITORING	
E1: Prepare and publish post-adoption statement	Monitor and Report on the implementation of the ELP
E2: Monitor significant effects of implementing the plan	
E3: Respond to adverse effects	

3.5 Method of Assessment

- 3.5.1 The ELP has been assessed against the SA framework to establish the likely significant effects, both positive and negative, of the options and policies. The SA framework sets out the Sustainability Objectives, Indicators and Targets, which are used to assess the likely impacts of the plan. The SA framework is based on the framework developed to assess the Core Strategy and Sites and Policies Plan with the addition of objectives and indicators of relevance to the ELP. The SA framework has been developed in consultation with the statutory consultees, key local stakeholders and Council officers.
- 3.5.2 The SA predicts the likely significant, social, economic and environmental effects of the ELP, including alternatives, and then evaluates the effects of the plan. The assessment includes the likely impacts on issues such as: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above.
- 3.5.3 The assessment is carried out in the form of a matrix and includes the identification of potential mitigation measures. The assessment has included the prediction and evaluation of the likely significant effects including:
- short, medium and long term effects
 - temporary and permanent, direct and indirect effects
 - cumulative or synergistic effects
 - consideration of mitigation measures
 - proposals to monitor the effects of the plan

The results are scored as follows:

Major Positive	++
Minor Positive	+
Uncertain	?
Minor Negative	-
Major Negative	--
No Significant Impact	

- 3.5.4 A commentary accompanies the matrix to explain the reasons for the scoring. The results are assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent and temporary effects. The assessment of alternative options includes a clear audit trail of the details for selection and rejection in order to document a transparent approach.
- 3.5.5 The SEA Directive also requires an assessment of secondary, cumulative and synergistic effects. Collectively these effects are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the area too small to support the species at all.

3.6 Results of Consultation

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

- Scoping Report of ELP, September 2014
- Issues and Options, September 2014
- Issues and Options SA Report, September 2014
- Draft Estates Local Plan, February 2016
- Draft Estates Local Plan SA Report, February 2016
- Submission Draft Estates Local Plan, November 2016
- Submission Draft Estates Local Plan SA Report, November 2016

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

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

3.6.4 Further consultation has also been carried out by Clarion with the residents of each of the estates. Consultation exercises have included:

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

Summary of Representations - Scoping Report, September 2014

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

3.6.6 The [Environment Agency \(EA\)](#)

- There is a need to clarify if any new development is anticipated or if the plan is to renovate the existing homes
- A significant part of Ravensbury estate lies in a high flood risk area and any regeneration will require appropriate flood management and mitigation measures. Due consideration should be given to local flooding constraints identified within the Borough's Strategic Flood Risk Assessment (SFRA) and Surface Water Management Plan when considering the location of and capacity for development.
- Any additional development in the area should consider the following issues:

- correctly apply the sequential test, steering new development to the lowest flood risk zone appropriate to the proposed use, and the exception test where necessary
- reduce flood risk through making space for water
- where climate change is expected to mean that some existing development may not be sustainable in the long-term, use regeneration to help relocate existing development to lower risk locations
- development will not encroach into the buffer zone adjacent to any open watercourse, so as not to jeopardise flood defence interests, hinder future maintenance or adversely affect the character or habitat value of the watercourse.

3.6.7 Natural England (NE)

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

3.6.8 Historic England (formerly English Heritage)

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

3.6.9 The Baseline information has been updated to reflect the comments from Historic England as set out in [Section 4.5](#) of this report. A separate objective on the historic environment has been added to the Sustainability Appraisal Framework, in line with the comments above.

Summary of Representations - Issues & Options SA, September 2014

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

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

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

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

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

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

Summary of Representations - Draft ELP SA report, February 2016

3.6.12 Natural England and Historic England did not provide specific comments on the SA report. The Environment Agency provided detailed comments on how the elements of Flood Risk and Biodiversity could be improved. The full response can be found on the Council website.

3.6.13 Responses were also received from the following:

- **Savills on behalf of Clarion** - notes that the draft Strategic Environmental Assessment (SEA), which underpins the Plan does not consider the three options for the Estates, being complete regeneration, enhanced refurbishment and Decent Homes Standard refurbishment. The SEA needs to fully consider the alternatives to regeneration and discount them.

Other key concerns identified by Clarion, Savills and the design team are summarised as follows:

1. The draft Estates Local Plan will form part of the development plan and as such it is important to emphasise that any planning application must have regard to the whole development plan, including the London Plan (2015), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. This is an important legislative context that should be included within the DPD.
2. The draft DPD does not set the context in terms of housing need and delivery. We feel this is an important consideration that should be added.
3. Each of the sites are large enough to create their own character and therefore, the level of prescriptiveness in the policies is considered to be unnecessary. Flexibility should therefore be built in to the policies to allow each masterplan to develop through a design-led process having regard to creating their own character, whilst being respectful of the surrounding context and amenities where it is necessary.
4. The DPD is not considered to read consistently as a whole at present as there are conflicts between the draft policies, particularly in relation to the expected density of residential accommodation, which would be heavily constrained by the building heights policies.

5. The policies are considered too prescriptive and there is limited flexibility built into the policy wording to allow an appropriate design led scheme to develop having regard to the site specific circumstances of the Estates and other material considerations.
 6. High Path is within an Area of Intensification (as set out in The London Plan 2015) which is not acknowledged within the draft Estates Local Plan.
 7. There are inaccuracies and errors within the existing analysis which should be amended to ensure policies are based on correct and consistent analysis.
 8. A second round of consultation on the draft DPD may not be required and the inclusion of this would have a significant impact on the timescales for delivery of the regeneration.
- **GLA** - The Mayor welcomes Merton's aim to master plan these potential large development sites through a development plan document (DPD) as recommended by London Plan policy 3.7. However, the policies need to be flexible enough to be implemented over the Plan period. The document provides very limited commentary on the types, nature and tenure of housing that the Council wants to be re-provided. The Council should be satisfied that the parameters, including the height recommendations, do not limit the opportunity to optimise housing delivery across the sites in line with London Plan policies 3.3 and 3.4. In addition, in line with London Plan policy 3.7, on the larger sites higher densities should be encouraged.

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

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

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

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

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

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

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

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

3.7 Review of the SA Process

- 3.7.1 As a consequence of the representations received to the Draft ELP, February 2016 the London Borough of Merton commissioned [Jam Consult Ltd](#) in August 2016 to undertake a review of the SA process in support of the ELP. The review of the sustainability appraisals and supporting documents identified some defects in the SA process, which needed to be corrected if the ELP was to be considered sound when subjected to Examination in Public (EiP).
- 3.7.2 In particular, the review found the assessment of options for each of the estates should be revisited in respect of the representations received. The Submission Draft SA was therefore prepared to enable greater clarity to be provided on the reasons for the selection and rejection of alternatives. It was also recognised that the results of the assessment could be strengthened, by providing greater links to the supporting evidence and a more detailed commentary to support the results.
- 3.7.3 The assessment of options and policies was also reviewed and a further assessment carried out, as set out in [Sections 7 and 8](#) of this report and the [Appendices](#).

[Summary of Representations - Submission Draft SA report, November 2016](#)

- 3.7.4 This SA was prepared in response to the representations received in the previous stages, in particular the need to assess the options that had been considered for the Estates and to explain the reasons for the selection and rejection of alternatives. Other amendments included updates to the Baseline Data, additions to the Plans, Programmes and Policies and consideration of the issues identified when undertaking the assessment. Details of the assessment of the options can be found in [Sections 7 and 8](#) and [Appendix A5](#) this report.
- 3.7.5 270 responses were received from 41 respondents. A summary of the responses can be found at [Appendix A10](#) of this report and the full responses on the Council's website <http://www.merton.gov.uk/estatesplan>. Key issues that were raised from the organisations that responded were as follows:

Environment Agency (EA) -

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

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

Natural England -

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

GLA -

The Local Plan is supported in principle and conforms with the London Plan in aiming to bring forward the redevelopment of existing municipal housing and the delivery of new housing within the Merton Housing Zones. In particular the Local Plan aims to provide significant additional housing through making efficient use of land, in line with policies in Chapter 3 of the London Plan.

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

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

Metropolitan Police Service-

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

Savills on behalf of Clarion

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

Sport England

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

Ravensbury Residents' Housing Associations

In the Stage 3 report, it appears that very little attention has been paid to certain aspects of the residents Stage 2 responses. The residents would like the Planning Inspector to request copies of all of the Stage 2 responses in order to independently ascertain to what extent the residents own views have been overruled by the council officers own personal viewpoints, which lack proper professional substantiation relative to the actual experience of living in Ravensbury the residents themselves. Detailed comments on the specific policies were also provided, which are set out in [Appendix A10](#) and the Statement of Consultation.

High Path Community Association

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

Other

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

4 Baseline and Context

4.1 Links to other policies and programmes

- 4.1.1 A review of the policies, plans and programmes, which could influence the ELP and its Sustainability Appraisal are set out in the [Scoping Report 2014](#). A summary of the information is included for ease of reference in [Appendix A2](#) of this report, which has been updated to reflect any changes since 2014.

4.2 Background

- 4.2.1 Clarion acquired the ownership and management of the Estates in 2010 as part of a Housing Stock Transfer Agreement (HSTA) containing all the Council housing stock within Merton, totalling circa 9,500 units.
- 4.2.2 Baseline data was collected at the SA scoping stage, which was updated at the previous stages of the SA and in the Submission Version SA. The baseline information provides the basis for predicting and monitoring the environmental and sustainability effects of planning policy. A summary of the updated baseline information is provided below, which has been made more specific to each Estate. Further information on the baseline data can be found in the [Scoping Report 2014](#), and [Issues and Options SA Report, 2014](#).

4.3 The Estates

Eastfields

- 4.3.1 The Eastfields Estate is located towards the east of the London Borough of Merton (LBM), within the Figges Marsh ward. Broadly rectangular in shape, the Estate sits to the north west of Streatham Park Cemetery and is bounded by Acacia Road / Mulholland Close to the north west and Clay Avenue to the east, south and west. Mitcham Eastfields Railway Station is around 5 minutes walk to the west of the Estate.
- 4.3.2 Originally constructed in the late 1960s to early 1970s, the estate area totals approximately 6.87 hectares. The estate currently comprises 466 dwellings, comprising a mix of three storey town houses and flatted blocks. The site is laid out with residential blocks on the perimeter of the rectangular site and communal amenity space to the centre. The properties include a mix of tenures including private ownership (as a result of right to buy) and social rent.
- 4.3.3 The estate is in a predominantly residential area, where the scale of built development surrounding the site varies considerably. The exceptions to this are the two storey St Marks Academy and playing areas, located to the north of the site, and the Cemetery to the south. The built development to the west of the site is predominantly terraced and detached houses of two to three storeys. There are no non-residential land uses on the site at present.

High Path

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

- 4.3.5 The Estate area totals approximately 7.2 hectares and currently comprises 608 residential dwellings in a mixture of tower blocks, flats, maisonettes and terraced houses. Accommodation forms a mix of tenures including private ownership (as a result of right to buy) and social rent. The number of storeys across the site ranges from 1 to 12. Parking on the estate is provided by surface parking courts and garages.
- 4.3.5 Merton High Street establishes the northern boundary of the site, comprising various commercial and retail units. There are two storey residential dwellings to the east of the site, and adjacent to the south-eastern boundary of the site are part-single and part-two storey industrial / commercial buildings (The Old Lamp Works). South of the site, on the opposite side of High Path, is a community resource centre and east of this is a two-storey church. Merton Abbey Primary School and a church are also located to the south of the site adjacent to High Path road. To the west are two to four storey houses, with South Wimbledon station located at the north-western corner.

Ravensbury

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

4.4 Updated Baseline Information

- 4.4.1 The previous SA Reports provide a summary of the baseline information relevant to the estates. The [Case for Regeneration, September 2015 \(updated October 2016\)](#) prepared by Savills on behalf of Clarion also provides the following information, which has been used in the SA of the Estates Local Plan and should be referred to for information. The information includes:
- Condition of Housing Stock
 - Housing Need
 - Socio-Economic Profile
 - Urban Design
 - Energy Performance
 - Flood Risk
 - Geotechnical/Geo-environmental
 - Visual Impact Assessment

4.4.2 The following supporting information has also been produced to inform the Plan:

Eastfields

- Ellis and Moore Consulting Engineers Ltd - Structural Engineers Report, October 2010
- Baily Garner - Condition Survey Report, December 2014
- HDH Planning and Development Ltd - Housing Needs Study, March 2015
- MLM Consulting Engineers - Energy and Sustainability Report, November 2014
- Sue McGlynn Urban Design Ltd - Design Review Study, February 2015
- Peter Brett Associates - Environmental Desk Study, February 2014
- Peter Brett Associates - Socio-Economic Analysis, July 2015
- Peter Stewart Consultancy – Visual Impact Assessment, October 2016

High Path

- Ellis and Moore Consulting Engineers Ltd - Structural Engineers Report, October 2010
- Property Performance Services (PPS) - Dwelling Condition Appraisal, November 2015
- Proudlock Associates - Accessibility Audit and Appraisal, October 2014
- HDH Planning and Development Ltd - Housing Needs Study, March 2015
- Sue McGlynn Urban Design Ltd - Design Review Study, October 2014
- Peter Brett Associates - Environmental Desk Study, February 2014
- Peter Brett Associates - Socio-Economic Analysis, July 2015
- PRP Architects and PRP Environmental Energy Assessment
- Peter Stewart Consultancy – Visual Impact Assessment, October 2016

Ravensbury

- Tully De'ath - Structural Assessment Reports, October and November 2014
- HTA Architects - Dwelling Condition Survey, February 2015
- HTA Architects - Energy Performance Study, November 2014
- Pennington Choices Ltd - Demolition Asbestos Survey, September 2014
- HDH Planning and Development Ltd - Housing Needs Study, March 2015
- Sue McGlynn Urban Design Ltd - Design Review Study, October 2014
- Peter Brett Associates - Environmental Desk Study, February 2014
- Peter Brett Associates - Socio-Economic Analysis, July 2015
- Peter Stewart Consultancy – Visual Impact Assessment, October 2016

4.4.3 As a result of the responses to the consultation on the previous SA reports, some gaps were identified in the baseline information that needed to be addressed. The review of the SA process also revealed a lack of information on specific issues relating to each of the estates, in particular with regard to the Historic Environment.

4.5 Historic Environment

- 4.5.1 The following assets are listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for their special architectural or historic interest. Any impact to the assets or their settings will need to be considered in the regeneration of the estates.

High Path

- **Wheel house at Messrs Liberty's 23.2.1976 Printworks GV II**
Wheel house to textile printing mill. C18. Brown brick. Pantile roof, low pitched to eaves. Gable end to road; C19 undershut wheel exposed to right with four sets of seven cast iron arms. Messrs Liberty's Print works stands on part of site of Merton Priory. The site has been used for printing textiles for the past two centuries. The wheel house was used for washing materials in the Wandle during part of the processing. Listing NGR: TQ2640569829
- **Two Street lamps outside No.12 and No.34 GV II**
Lampposts. Circa 1900, probably designed for electricity. Cast iron fluted column with fluted base and capital, surmounted by square maintenance box and curved brackets with scrollwork decoration and shallow dish reflector. Listing NGR: TQ2636269907
- **LRT Station, including adjacent shops to 25.6.87 left and right - II**
LRT Station. 1926. Designed by Charles Holden. Portland stone. Roof not visible. Symmetrical composition on corner site. Vertical stripped classical manner. Tall ticket hall to corner with triple entrance below, flanked by lower single storeyed ranges of shops. Curved facade. 3 square headed entrances with stepped jambs and cantilevered canopy. Tall clerestory above, divided into 3 parts by pair of pilasters with globular capitals, the LT motif in the round. Vertical metal glazing bars with inset LT motif in stained glass. One of stations on extension of 1926 to City and South London Underground Railway. Listing NGR: TQ2582170023
- **Colour House at Messrs Liberty's 23.2.1976 Print Works GV II**
Colour house of textile printing works. Dated 1742 with late C19 alterations. Brick and flint with random rubblestone blocks (reused stone); brick quoins. Pantiled roof pitched to eaves. Two storeys. Segmental headed windows. Brick surrounds. Listing NGR: TQ2642469839
- **Wall running along south side of road 7.5.1954 - II -**
Wall. C17 and later. Built of flint with random ashlar stone from the ruins of Merton Priory. Corbelled course below gabled top. At east end the jamb is of rebuilt doorway with some probably C20 fragments. Listing NGR: TQ2631969890
- **Portion of wall on the west side of the River Pickle between Merton High Street and Merantun Way. 25.6.87 II -**
Wall, formerly part of precinct wall to Merton Priory. Medieval with later restoration and rebuilding. Flint and rubblestone. About 6 feet high. Listing NGR: TQ2665770041

Ravensbury

- **White Cottage - II**
Detached house. Circa late C18. Painted weatherboarding, with fillets to front elevation. Old tiled double-pitched roof to eaves. 3 storeys. 1 bay. Square headed entrance in recessed lean-to to right. Single 3-storeyed canted bay window to front elevation, with horned sashes to each face; glazing bars. Eaves cornice. Stacks to left. Listing NGR: TQ2650568391
- **The Grange, Morden - II**
Villa. Late C18. Stucco. Low hipped slate roof to parapet. 2 storeys. 4 windows wide. Projecting solid sided pilastered porch to second bay from left, with garland frieze and guttae; cornice. Margin glazing to door and square fanlight over. Square headed sashed windows, glazing bars. Cornice above first floor. Returns to left and right each with semicircular 2-storey bay windows. Interior not inspected. Listing NGR: TQ2617168157
- **Ravensbury Mill - II - Morden Road Micham**
Water mill, now factory. Mid/late C18: C1880 main block. Main block of stock brick with hipped slate roof. L-plan with rear right wing; 7-window range. Cambered red brick arch over plank loft door with iron-crane hoist above plank double doors. Cambered red brick arches over cast-iron casements to first floor and blocked window openings to ground floor. Mid/late C18 one-story range to left, of stock brick with gabled concrete tile roof: red brick cambered arch and timber lintels over blocked window openings and plank door in mid C19 bay added to left: right-hand bay houses water wheel. Interior: notable for retention of two iron undershot water wheels, dated I.C.R./1884, and of the "Poncelot" type (after invention by J.C.Poncelot, 1824): each have curved sheet-iron buckets and cast or wrought-iron draft; wooden pit wheel to left, probably re-used and of earlier date. Listing NGR: TQ2640168167
- **Pedestal and statue of Neptune 10 yards 7.5.1954 to south east of walled garden GV II**
Statue. C18. Portland stone. Standing figure of Neptune, crowned and draped, his right foot placed on mouth of a dolphin. Rectangular bombe shaped base. Listing NGR: TQ2623368482
- **Walls of walled garden to south of 7.5.1954 Morden Hall GV II**
Walls and railings enclosing former garden. C18. Red brick walls some 12 feet high, coped and buttressed at intervals. Clairvoyee of cast iron railings to south, Greek key pattern. Listing NGR: TQ2613168454
- **Morden Lodge 7.5.1954 II**
Villa. Early C19. Stucco. Slate low hipped roof to eaves. 2 storeys. 3 windows wide. Central projecting porch with slender fluted Doric columns; cornice; panelled door, arched decorative fanlight. Square headed windows, corniced to ground floor; sashes and glazing bars to ground floor; French casements to first floor; margin glazing; iron window guards; bracketted eaves. Interior not inspected. Illustrated in Stanley C Ramsay's Small Houses of the Late Georgian Period. Listing NGR: TQ2621868345
- **Milestone opposite no. 92 II**
Milestone. C18. Portland stone. Square in section with pyramidal top. Inscriptions worn away. No. 92 is not included. Listing NGR: TQ2613068317

- **Morden Hall Park - A moated garden of the late C18, set within a park created in the late C19.**
Morden Hall Park is located in urban south-west London and lies c 500m south of Merton, c 300m east of Morden, c 4km north of Sutton, and c 1.5km east of Mitcham. The boundaries of the roughly triangular site are formed to the north-east by the Croydon and Wimbledon Railway, constructed 1865, to the west by Morden Hall Road (A297), and to the south by Morden Road (A239). The 38ha level site is crossed by a number of watercourses, all part of the River Wandle which runs north to the Thames. This garden is registered under the Historic Buildings and Ancient Monuments Act 1953, within the Register of Historic Parks and Gardens by English Heritage for its special historic interest. List entry Number: 1001336

4.6 Archaeological Priority Areas

- 4.6.1 An Archaeological Priority Area (APA), previously Archaeological Priority Zone, is a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries.

Archaeological Priority Area Tiers

- 4.6.2 Previously, all parts of Merton were either inside or outside an Archaeological Priority Zone (APZ). Under the new system all parts of the borough will fall into one of four different tiers of archaeological significance and potential. The tiers vary depending on the archaeological significance and potential of that particular area. New Archaeological Priority Areas (APAs) have been categorised into one of Tiers 1-3 while all other areas within the borough will be regarded as being in Tier 4. Tier levels indicate when there is a need to understand the potential impact of the proposed development on the heritage asset's significance. The type of planning applications and the tier level it is located in indicate the likelihood that archaeology will be a consideration in reaching a planning decision.
- 4.6.3 Consultation guidelines are set out in the Greater London Archaeological Advisory Service (GLAAS) Charter. New guidelines will link the tiers to specific thresholds for triggering archaeological advice and assessment. It is expected that as a minimum all major applications within Archaeological Priority Areas (Tiers 1-3) will require an archaeological desk based assessment, and if necessary a field evaluation, to accompany a planning application. In the more sensitive Tier 1 and Tier 2 areas this procedure would also apply to some smaller scale developments.
- 4.6.4 Outside Archaeological Priority Areas (Tier 4) some major developments, such as those subject to Environmental Impact Assessment, may warrant similar treatment. Pre-application consultation with GLAAS is encouraged to ensure planning applications are supported by appropriate information.
- 4.6.5 **Tier 1** is a defined area, which is known, or strongly suspected, to contain a heritage asset of national importance (a Scheduled Monument or equivalent); or is otherwise of very high archaeological sensitivity. Thus Tier 1 covers heritage assets to which policies for designated heritage assets would apply and a few other sites, which are particularly sensitive to small scale disturbance. They will be clearly focused on a specific heritage asset and will normally be relatively small. Scheduled Monuments would normally be included within a Tier 1 APA.

- 4.6.6 **Tier 2** is a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. Planning decisions are expected to make a balanced judgement for non-designated assets considered of less than national importance considering the scale of any harm and the significance of the asset. Tier 2 APAs will typically cover a larger area than a Tier 1 APA and may encompass a group of heritage assets.
- 4.6.7 **Tier 3** is a landscape scale zone within which the GLHER holds evidence indicating the potential for heritage assets of archaeological interest. The definition of Tier 3 APAs involves using the GLHER to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Tier 3 APAs will typically be defined by geological, topographical or land use considerations in relation to known patterns of heritage asset distribution.
- 4.6.8 **Tier 4 (outside APA)** is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. However, Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times. Such potential is most likely to be identified on greenfield sites, in relation to large scale development or in association with Listed Buildings or other designated heritage assets.
- 4.6.9 The Estates include the following Archaeological Priority Areas:

Eastfields

None

High Path

- **Merton Priory (Schedule Ancient Monument (Tier 1))**
The APA covers the principal areas of the Augustinian Priory of St Mary Merton. It includes the scheduled area for the Priory and is bounded by the Wandle River to the east and north and a stream known as the Pickle to the west and south. While parts of the Priory's precinct walls extended to the south and west of the APA, the locations of the majority of monastic buildings were situated within the APA boundary. The APA is classified as Tier 1 because it includes a scheduled site, which has associated archaeological remains in its vicinity.
- **Merton Place (Tier 2)**
The APA covers the area bounded by Merton High Street to the north, Abbey Road to the east, High Path to the south and Pincott Road to the west. The APA is occupied by the High Path Estate but was formerly the site of Merton Place and its grounds. It is classified as Tier 2 because it is a heritage asset of historic significance and value due to its link with Vice Admiral Horatio Lord Nelson.
- **Stane street (Tier 2)**
The APA follows the route of the Roman road known as Stane Street, which runs from London to Chichester and crosses the borough from north-east to southwest. The route of High Street Colliers Wood follows the route of Stane Street from the borough boundary with Wandsworth as far as Colliers Wood Station. After this point, Stane Street continued in a straight line towards Pylford Bridge in the southwest and crossed through the area that was later to become the site of Merton Priory. It ran slightly to the west of Stonecot Hill and its route to the south approximately follows the borough boundary between Merton and Sutton. It has been classified as Tier 2 because it is a corridor of land flanking the route of a Roman road with the potential to reveal elements of the road itself or of roadside activity and settlement.

- [Wandle/Colliers Wood \(Tier 2\)](#)

The APA follows the course of the Wandle River between the railway line at the northern edge of Wandle Meadow Nature Park and Morden Hall Park. It surrounds the Tier 1 APA for Merton Priory and remains of the Priory's outer precincts may be located within it. It is classified as Tier 2 because it is an area of historic industry and also because of the concentration of earlier sites around the crossing point of Stane Street over the Wandle. It is one of four APAs, which cover the River Wandle as it passes through Merton.

Ravensbury

- [Morden Hall Park \(Tier 2\)](#)

The APA covers Morden Hall Park and extends into an area to the north-east of the modern Tramlink tramlines to the south of Phipps Bridge. The Park was not enclosed until the 1870s and prior to this, this stretch of the River Wandle was characterised by a significant number of important mills and factories. Grand country houses were also built within the APA; sometimes by the owners of the mills and factories. The APA is classified as Tier 2 because Morden Hall Park is a Grade II Registered Park and Garden with significant archaeological interest and it is also an area of historic industry. It is one of four APAs, which cover the River Wandle as it passes through Merton.

- [Wandle/Micham \(Tier 2\)](#)

The APA follows the route of the River Wandle from Ravensbury Mill near Morden Road to the borough boundary with Sutton to the south-east. It is classified as Tier 2 because it is an area of historic industry. Within the APA different mills and factories were built, rebuilt or adapted and demolished owing to numerous factors such as fire damage, economic downturns or change of use, all of which add to their interest and history. The presence of a sizeable Anglo-Saxon cemetery nearby as well as a number of prehistoric archaeological finds demonstrates the multi period activity in this area. The exact location of a settlement associated with the Saxon cemetery is currently unknown but it could be located within the APA. The APA is one of four which cover the river Wandle as it passes through Merton.

Further Details on the Archaeological Priority Areas can be found in '[London Borough of Merton - Archaeological Priority Areas Appraisal, Historic England, April 2016](#)'

4.7 Conservation Areas

- 4.7.1 Ravensbury Park forms part of the Wandle Trail and is included in Conservation Area 025 - The Wandle Valley Conservation Area. Further information can be found in the Wandle Valley Conservation Area Character Assessment on the Council's website.

4.8 New Evidence

- 4.8.1 Since the publication of the Submission Draft ELP and SA report, new evidence has been prepared in support of the Plan, which includes:

- Housing Market Assessment for the Estate Regeneration Areas, February 2017
- Estates Local Plan Viability Assessment, March 2017

Housing Market Assessment

- 4.8.2 The Housing Market Assessment has been prepared to develop a clearer understanding of local housing needs in the context of the three estates in the ELP. The assessment is not a borough wide Strategic Housing Market Assessment (SHMA). A borough wide SHMA will be completed by late 2017 to inform Merton's emerging Local Plan for the borough. Evidence has been gathered from up to date census data and GLA projections for the demographics of the borough, government and local planning policy, Merton's Annual Monitoring Report and information on the socio-economic analysis and housing needs study for each estate. The report also uses evidence provided by Clarion on the existing housing need within the estates, assesses evidence of housing need in London and Merton to give a clear understanding of housing need in the local area in the context of the ELP.
- 4.8.3 The report acknowledges that the increase in homes enabled by the ELP will help Merton meet its share of London's housing need, identified by the most recent London wide Housing Market Assessment as 42,000 to 49,000 homes per annum. However, it is recognised that the three estates combined cover an area of 16.85 ha. of Merton's 376,247 ha., which amounts to less than 0.005% of the total area of the borough. The estates currently provide approximately 1,200 homes in the context of 86,000 across the whole borough.
- 4.8.4 As the ELP only covers a small part of Merton, will involve the loss of existing homes prior to new homes being built and will be delivered over a 10-15 year period, it will result in a relatively modest average annual net gain in new homes over the 15 year lifetime of the Plan of circa 150 additional homes per year. It is important that the ELP is not prescriptive, given the need for flexibility to allow each scheme to be responsive to market drivers and market conditions. Although indicative figures for potential dwellings on each site according to the London Density Matrix have been given each scheme will be assessed at the point that it comes forward on the merits of its design. All proposed accommodation schedules provided by Clarion may therefore be subject to change in order to respond to factors such as viability and future housing need.
- 4.8.5 The **indicative** figures for the potential dwellings on each site are set out below. All existing affordable housing will be re-provided on each estate with no net loss of affordable habitable rooms or floorspace.

Estate	No. of Existing Homes	No. of Proposed Homes
Eastfields	465 to be demolished	773 new 308 additional
High Path	608 to be demolished	1527 new 919 additional
Ravensbury	192 homes 97 to be demolished	194 new

Viability Assessment

- 4.8.3 The Viability Assessment provides a high-level assessment of the ELP in order to meet the requirements of paragraphs 173-177 of the NPPF, which are concerned with the evidence base to ensure viability and deliverability of Local Plans. The report must assess the ability of the standards and policies within the ELP to enable the development of viable sites at a suitable scale of development. The report does not specifically consider the viability of emerging proposals from the current landowner and Developer, Clarion.
- 4.8.2 The report finds that the policies and the underlying urban design principles within the ELP will not result in any significant burden beyond the existing planning framework. The regeneration of the three estates represents a significant long term investment, which is likely to be implemented over many phases and different economic cycles and makes a viability assessment an uncertain process.
- 4.8.3 The viability assessment has drawn on the existing viability evidence, which shows that High Path generates a marginal surplus/deficit, whilst Eastfields and Ravensbury both generate a deficit. Overall, when considering the Council's expectation for the regeneration of all the estates as a single comprehensive programme, the marginal surplus/deficit would be insufficient to cross-subsidise the deficits at Eastfields and Ravensbury.
- 4.8.4 There are, however, a number of special circumstances that lead Clarion to consider the proposed programme to be viable, including higher densities and non-assignable obligations relating to the stock transfer agreement including commitments to undertake Decent Homes improvements. It is therefore considered that the ELP meets the NPPF test that the cumulative impact of the standards and policies should not put implementation of the plan at serious risk.

4.9 Difficulties and limitation of baseline data

- 4.9.1 The collection of data for an SA is an on-going exercise, and will need to continue to be reviewed as part of the monitoring exercise. The data that is presented in this SA Report is considered as up to date as possible and sufficient to determine the key sustainability issues for the Estates Local Plan.
- 4.9.2 It should be noted that in the long-term, the requirement to monitor the sustainability of the Estates Local Plan will provide further detailed and focused baseline information for use in any subsequent Sustainability Appraisals and revisions and amendments to the Estates Local Plan policies.

5 Sustainability Issues and Objectives

5.1 Sustainability Issues for the Plan

- 5.1.1 The key sustainability issues that need to be considered in the Estates Local Plan and its Sustainability Appraisal have been identified through the Plans, Programmes and Policies review and the analysis of the Baseline Data, including consideration of the information provided in the Case for Regeneration prepared by Savills for Clarion and the supporting documents.

Case for Regeneration

- 5.1.2 As part of the commitment to improving the quality of accommodation to Decent Homes Standards, since 2010 Clarion has undertaken technical surveys and financial planning work towards achieving this commitment. In Clarion's view, this work has indicated that significant refurbishment; maintenance work and financial investment would be required to the housing stock to achieve the required standard.
- 5.1.3 Clarion has advised that residents of Eastfields, High Path and Ravensbury have provided information about the problems with their homes and outside spaces, which include: homes that are expensive to heat; leaking roofs; poor noise insulation; condensation and damp; issues with refuse collection; and unsafe pathways. Some of these issues were also raised by residents during the Council's consultation in the autumn of 2014 and 2016, particularly concerns around unsafe pathways, damp and poor internal conditions.
- 5.1.4 Having undertaken an exploration of reasonable options (see Sections 7 and 8 of this report) Clarion has decided that regeneration is the most cost effective way of delivering longer term sustainable decent homes, through the provision of new, well-designed, energy-efficient homes that will meet the needs of residents now and in the future.
- 5.1.4 For Eastfields and High Path, Clarion propose regeneration of the whole estates and for Ravensbury, a mixture of partial regeneration refurbishment and retention. It is the Council's view, supported by Clarion's evidence that whilst incremental refurbishment and Decent Homes works would improve the internal housing quality in the short to medium term, regeneration provides an opportunity to deliver comparatively more significant positive changes to the three neighbourhoods and a once in a generation opportunity to improve the quality of life for current and future residents.
- 5.1.5 Regeneration will be expected to provide a range of choices and benefits including high quality well designed neighbourhoods, wider housing mix, more private space for residents, better quality green spaces and community facilities and job creation opportunities. It will also be an opportunity to provide much needed new homes by making more efficient use of brownfield land, improving the quantity, quality and mix of new homes on each of the three estates.
- 5.1.6 A key expectation of any regeneration proposals that come forward will be a commitment to keeping the existing community together in each neighbourhood, and for existing residents to have a guaranteed right to return to a new home in their regenerated neighbourhood.
- 5.1.3 Specific Issues and Opportunities for the regeneration of the Estates have been identified in the Draft Estates Local Plan and are summarised below:

Eastfields

- **Integration**
 - the estate has an inward looking layout
 - buildings form one uniform edge distinct from the surrounding area
 - the main access road lacks visual and vehicular connectivity
 - the inefficient street layout restricts accessibility for vehicles, pedestrians and cyclists.
- **Estate architecture**
 - a uniform architectural style with rigid and unvarying finish
 - visually isolated from the surrounding area
 - buildings have weathered poorly
 - positive elements of the architectural style have been eroded by a variety of alterations.
- **Estate layout**
 - a rigid road layout which prevents movement through and around the estate
 - a sole perimeter road with buildings on one side only, and a series of short cul-de-sacs.
 - fronts of buildings dominated by garage doors, backs face the open spaces
 - poor public realm
- **Quantity v Quality of landscaping**
 - publicly accessible designated open space around the perimeter isolated by the access road, poorly surveyed, in poor condition and essentially un-useable.
 - large central semi-private non-designated open space of high quality
 - smaller spaces leading off central area less successful, owing to close proximity to back gardens
- **Visual connectivity**
 - lack of visual connectivity to surroundings, which exacerbates estate's isolation
 - potential to make residents feel they are part of a wider community.
- **Legible residential streets**
 - potential to create a legible hierarchy of streets and blocks, which allow for movement of pedestrians and vehicles throughout site.
 - need to connect site to its surroundings and allow for easier access
 - provision of traditional residential streets where fronts of buildings face each other and buildings overlook the public realm.
- **Street network**
 - creation of an east-west link to integrate the estate into the wider area.
 - creation of a visible north-south street through the estate to help integrate the estate into wider area.
- **Create a focal point for the area**
 - create a focal point to link the estate to its surroundings
- **Reconfiguration of open space**
 - develop undesignated open spaces to allow better distribution of functional open space throughout the estate.
 - retain existing established mature trees in the central green space.
 - make publicly accessible open space, to include local focal points, squares, communal gardens, food growing etc.
- **Visual links to surroundings**
 - create visual connectivity to the surroundings of the playground and cemetery
 - make the BMX track less visually isolated
 - retain the mature trees surrounding the site, whilst opening out longer and wider views.

High Path

- **Street frontage to Merton High Street**
 - undermines the commercial functionality and potential of the street and puts residential uses in an uncomfortable relationship with the busy commercial street
 - fails to physically define the street as a space, undermining its identity as a place.
- **Sense of place and active frontage on Morden Road**
 - the arrangement, height, position and function of the buildings fronting this street undermines its ability to develop any distinctive identity.
 - lack of proper active ground floor uses undermines the commercial potential close to the tube station and creates an unattractive place, lacking in character and sense of identity
- **Mix of building styles, forms and orientation**
 - lack of coherence in form and character, mixes up fronts and backs
 - dismantles the traditional street pattern as most buildings fail to address the streets, turning them into functional access roads.
- **Development density**
 - site has good PTAL levels and could sustain a much higher density whilst still providing high quality homes and amenity spaces
 - arrangement of buildings and piecemeal development results in lots of space between buildings. and unused garages,
 - lack of functional, good quality public open space.
- **Connections to surroundings**
 - a series of cul-de-sacs makes easy navigation around the estate unclear.
 - building types and spaces, make the estate an uninviting place to move through.
 - perceptual and physical barriers to movement between the estate and its immediate surroundings both for vehicles, cyclists and pedestrians.
- **Nearby buildings and sites**
 - some buildings adjacent to the estate are assets and should inform the design and layout of new development – for example Rodney Place.
 - other buildings have a negative influence on perceptions and accessibility - particularly the varied buildings and sites between High Path, Station road and Merantun Way.
- **Frontage to Merton High Street**
 - fragmented street frontage on the south side of Merton High Street could be repaired and redefined.
- **Frontage to Morden Road**
 - poorly defined frontage and broken character.
 - opportunity to develop Morden Road as a wide, straight, boulevard linking the area with Morden with building frontages of an appropriate scale
- **Create an internal network of clearly identifiable streets**
 - reintroduce traditional street layouts.
 - streets should have proper frontages with entrances facing the street and create an easy to navigate and attractive network of routes across the estate.
 - network should be based on the pre-estate historic street pattern that remains in the form of Nelson Grove Road, Pincott Road and High Path.
- **Use land efficiently and create a consistent urban character**
 - use land more efficiently
 - increase densities and ensuring open space is well located, well designed, functional
 - and attractive.
 - create a consistent urban character.

- **Good quality landscaping and vegetation**
 - existing mature trees should inform the location and design of new buildings and be maintained.
- **Attractive and functional open space**
 - existing recreational facilities could be better located to provide well defined and attractive spaces
 - potential to provide new public open space for passive as well as active recreation, utilising the existing historical character and landscape assets of the estate.
- **Improved links into the estate**
 - poor pedestrian facilities, dominant and uncoordinated highway infrastructure, and traffic congestion should be improved.
 - improve the public realm on Morden Road and Merantun Way by creating a better balance between vehicles and pedestrians and improve integration.
 - consider simplifying the junction of High Path, The Path and Morden Road and creating an attractive entrance, views to Merton Abbey Mills.
 - future links to the south of Merantun Way should be planned as well as east-west quietways for cyclists and pedestrians.
- **Adjacent development potential**
 - proposals should knit seamlessly into the surrounding area and enable integration of adjacent sites if or when they become available for development.
 - design of streets, uses, densities and heights should be include the wider area to provide broad guidelines for future sites
 - development should consider the introduction of boulevards for Merantun Way and Morden Road to create a better balance between vehicles and pedestrians.

Ravensbury

- **Accessibility to Morden Road and Wandle Road**
 - there are no direct pedestrian links between the estate and Morden Road
 - access to Wandle Road, where there is the frequent 118 bus route requires a circuitous route through the park or using the back alley.
 - consideration should be given to a footbridge across the river to an existing access onto Wandle Road to increase the accessibility of the area
- **Defined space on Morden Road**
 - an important space which currently lacks a clear sense of identity as it is the first impression of the estate.
- **Pedestrian and cycle links between parks, estate and tramstops.**
 - links from Morden Hall Park to the estate are impeded by heavy traffic on Morden Road, poor pedestrian crossing location and lack of good quality cycle facilities.
 - route from Morden Hall Park through or past the estate to Ravensbury Park is poorly defined, with the entrance to Ravensbury Park being very narrow and unclear.
 - The pathways to the tramstops at Belgrave Walk and Phipps Bridge are narrow and poorly surveyed and not very obvious from Morden Road.
 - Within the estate pedestrian routes are not clear

- **Integration between Ravensbury Park and estate**
 - little integration between the park and the estate, with rear gardens facing the park and poor quality vegetation marking the boundaries.
 - two narrow gated pedestrian links into the estate that are not obvious from within
 - a buffer of unattractive dense landscape has developed between the estate and the attractive grounds of the park.
 - pedestrian gateways into the park are poorly defined and have limited natural surveillance from the surrounding houses.
- **Development density**
 - potential to increase density appropriate to the suburban location to provide more space efficient layouts without undermining the landscape context.
- **Protecting the high quality landscape and retained buildings**
 - landscape setting defines the estate's character and makes it unique.
 - proposals should seek to integrate new and existing buildings into the surrounding high quality landscape.
 - refurbishment to homes will need to be sensitively undertaken to improve their function
 - retained buildings and spaces will need to be sensitively integrated into the new neighbourhood.
- **Flood mitigation**
 - estate is in close proximity to the Wandle River
 - proposals will need to address flood risk and where possible, reduce it without undermining the landscape character or semi-rural feel of the area.
 - Introduce swales in open space and provide natural habitat for nearby wildlife in the park
- **Biodiversity**
 - proposals will need to address the issue of biodiversity in Ravensbury Park and ensure natural habitats and species are not adversely affected
 - interface between homes and trees should be well designed.
- **Pedestrian and cycle links**
 - improve pedestrian and cycle crossing from Morden Hall Park to the estate
 - improve pedestrian permeability across the estate from north to south and east to west allowing for the introduction of routes to surrounding parks and tram stops.
 - provide a legible route from Morden Hall Park, past or through the estate to Ravensbury Park ensuring entrance to the park is clearly defined.
 - improved links will support the creation of the Wandle Valley Regional Park, achieving a high quality linked green infrastructure network, protecting biodiversity and providing opportunities for formal and informal recreation.
- **Street hierarchy**
 - reinforce historical spine road of Ravensburys Grove and create new streets in the form of traditional residential streets with active frontages onto public space.

- **Ravensbury Park**
 - blocks should be arranged to maximise the visual and natural amenity provided by the park
 - orientation of buildings or open space should front onto the park providing natural surveillance
 - integration of the park and the estate should be clearly defined however should not create a barrier
 - clearly defined safe pedestrian gateways into the park should be provided
 - proposals should ensure landscape setting of the estate is not undermined.
- **Local history**
 - utilise local history as a point of reference in the development of the scheme
- **Biodiversity**
 - ensure the preservation, protection and enhancement of the adjacent Ravensbury Park recognising its importance in terms of biodiversity.
 - provision of a suitable landscape buffer between the river and the proposed development.

5.2 Sustainability Objectives for the Plan

The Sustainability Objectives for the plan have drawn upon the sustainability objectives developed for the Core Strategy and Sites and Policies Plan. Further amendments have been made to the Objectives as a result of the consultation responses and the review of the SA work. SO3 River and Water Quality is now separate from SO4 Water Resources and Infrastructure and SO11 Built Environment and SO11 Historic Environment have also been separated in order to ensure clarity in the assessment of the issues being assessed. The following Sustainability Objectives have also been added for completeness: SO7 Noise; SO20 Diversity and Equality; SO23 Education and Skills and SO26 Viability and Deliverability.

Ref	SUSTAINABILITY OBJECTIVES
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.
SO2	CLIMATE CHANGE To address the causes of climate change through reducing greenhouse gas Emissions and adapting to the long-term effects of climate change.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.
SO7	NOISE To improve amenity by minimising the impact associated with noise.
SO8	TRANSPORT To reduce road congestion by improving travel choices, promoting public transport, walking and cycling, and reducing the need to travel by private vehicle.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.
SO10	BIODIVERSITY To protect and enhance biodiversity.
SO11	BUILT ENVIRONMENT To enhance and protect the built environment including the townscape and landscape and ensure new buildings and spaces are well designed and enhance local character
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings

Ref	SUSTAINABILITY OBJECTIVES
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.
SO15	WASTE Promote waste minimisation by re-use and recycling in line with reducing net carbon emissions and the waste hierarchy; and to recover the maximum value from residual waste by increasing energy derived from residual waste.
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.
SO22	CRIME To reduce crime and the fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.
SO24	ECONOMIC GROWTH To support economic growth and business development
SO25	EMPLOYMENT To increase local employment and skills
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development

5.3 Compatibility Assessment

5.3.1 In order to ensure that the Sustainability Objectives are compatible a compatibility assessment was carried out which found the objectives to be broadly compatible or neutral (no link) with a couple of potential incompatible objectives identified.

5.3.2 The matrix shows that the relationships between the Sustainability Objectives are predominantly compatible or neutral (no link). Where uncertain relationships are shown, the likely impact could be positive or negative depending on implementation. These impacts have been shown to highlight any potential incompatibilities.

5.3.3 The objectives where an uncertain impact has been identified are:

- SO1 Land Use
- SO2 Climate Change
- SO3 Water Quality
- SO4 Water Resources
- SO12 Historic Environment
- SO13 Energy & Carbon
- SO15 Waste

5.3.4 Potential incompatibility is shown against the following objectives in relation to SO2 Climate Change

- SO16 Housing
- SO24 Economic Growth

5.3.5 The building of new homes and economic growth is likely to have a negative impact on the amount of resources used and increase CO₂ emissions. However, such impacts may be able to be mitigated through the design and approach to development, which will be managed by development management policies, in particular the following:

Core Planning Strategy

- CS 14: Design
- CS 15: Climate Change
- CS 16: Flood Risk Management

Sites and Policies Plan

- DM D2: Design Considerations in all developments
- DM EP1: Opportunities for decentralised energy networks
- DM EP3: Allowable Solutions
- DM EP4: Pollutants

The full assessment can be found in [Appendix A3](#).

6 Sustainability Appraisal Framework

6.1 The SA Framework

- 6.1.1 The SA Framework for the Estates Local Plan was developed during [Stage A](#) of the SA process and was set out in the SA Scoping Report 2014. The SA Framework consists of a series of sustainability objectives and sub-objectives supported by indicators, which form the assessment criteria.
- 6.1.2 The SA Framework for the Core Strategy and Sites and Policies Plan has been used as the starting point for the assessment in accordance with guidance. The SA framework has been reviewed and, where appropriate, specific objectives and indicators relevant to the ELP have been added in response to comments received through the consultation process and the review of the SA.

6.2 Revisions to the SA Framework

- 6.2.1 The review of the SA Framework revealed that some amendments were required as follows:
- [SO3 Water Quality and Water Resources](#) has been split into two separate objectives (SO3 and SO4) so it is clear what is being assessed.
- [SO11 Built Environment](#) and [SO12 Historic Environment](#) have been split into two separate objectives in response to the representations by Historic England.
- The following new objectives have been added for completeness.
- [SO7 Noise](#)
- [SO20 Diversity and Equality](#)
- [SO23 Education and Skills](#)
- [SO26 Viability & Deliverability](#)

Indicators have also been added to the framework to enable future monitoring.

The full SA framework is provided overleaf.

Sustainability Appraisal Framework

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
SO1	<p>LAND USE</p> <p>To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.</p>	Development on brownfield sites	<p>Will the distinctiveness of the landscape and character be maintained and enhanced?</p> <p>Will land be used efficiently?</p> <p>Will the amount of derelict, degraded and underused land be reduced?</p>	<ul style="list-style-type: none"> • Amount of development on previously developed land • No. of long term empty properties
SO2	<p>CLIMATE CHANGE</p> <p>To address the causes of climate change through reducing greenhouse gas emissions and adapting to the long-term effects of climate change.</p>	Climate change mitigation and adaptation measures	<p>Will the emissions of greenhouse gases be reduced?</p> <p>What adaptation measures for climate change will be included including the consideration of urban heat island effect?</p> <p>What sustainable building methods and/or technologies are proposed?</p>	<ul style="list-style-type: none"> • Annual reduction in domestic energy consumption • Level of preparedness to manage risks from climate change • No./type of climate change mitigation measures considered and incorporated
SO3	<p>WATER QUALITY</p> <p>To reduce water pollution and improve water quality and resources in the River Wandle</p>	Rivers or water supplies of good quality	Will water pollution be reduced and the quality of the rivers be improved?	<ul style="list-style-type: none"> • Improve the biological and chemical status of the River Wandle to good by 2027 • No. of water pollution incidents
SO4	<p>WATER RESOURCES</p> <p>To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.</p>	Level of water consumption	<p>Will the level of water consumption be reduced?</p> <p>What water saving measures will be included?</p> <p>Will the infrastructure be adequate to support water and wastewater needs?</p>	<ul style="list-style-type: none"> • No. and type of water saving measures used in developments • Capacity of water and wastewater infrastructure relating to development.

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
SO5	SOIL & LAND QUALITY To maintain and improve soil and land quality.	Overall improvement in soil quality	Will the water quality in the soil be improved and maintained? Will any existing soil contamination be remediated?	<ul style="list-style-type: none"> Overall soil quality %age of contaminated land remediated
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.	Days when pollution levels are high	What are the potential sources of air pollution in construction and operation? Will air quality be improved?	<ul style="list-style-type: none"> No. of days of high pollution Annual average concentrations and exceedances of NO_x and PM₁₀
SO7	NOISE To improve amenity by minimising the impact associated with noise.	Levels of ambient noise	Will the level of ambient noise have adverse effects on amenity?	<ul style="list-style-type: none"> No. of priority areas in the borough Number of reported incidents of noise levels above 55dB (A) Lden
SO8	TRANSPORT To reduce road congestion by improving travel choices, promoting public transport, walking and cycling, and reducing the need to travel by private vehicle.	Levels of sustainable modes of transport	Will alternative modes of transport to the car be encouraged? Will the levels of road congestion increase? What is the capacity of the public transport? Will a travel plan be prepared?	<ul style="list-style-type: none"> No. of households with/without private vehicles PTAL levels by ward Types of personal travel by mode p/a Proximity of residents to cycling routes No. of relevant infrastructure projects completed p/a
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.	Properties at risk of flooding	Will fluvial and surface water flood risk be managed and reduced? Will SuDS be included? Will a Flood Risk Assessment be needed? Will development contribute to a higher flood risk elsewhere? Will the sustainable drainage hierarchy be followed?	<ul style="list-style-type: none"> No. of flooding incidents No. of properties in flood risk zones including fluvial and critical drainage areas No. of planning applications incorporating SuDS No. of planning applications incorporating flood resistant and resilient design measures.

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
SO10	BIODIVERSITY To protect and enhance biodiversity.	Number of protected species and habitats	<p>Will priority species and habitats identified in the BAP be protected and enhanced?</p> <p>Will habitat and wildlife corridors be linked and enhanced?</p> <p>Will sites designated for their nature conservation value be maintained and enhanced?</p> <p>Will there be a net loss to biodiversity within the estates and surrounding area?</p> <p>Will there be a loss of trees?</p>	<ul style="list-style-type: none"> • Change in priority habitats (ha) and species (no.) • No. of green roofs/facades • No. of trees
SO11	BUILT ENVIRONMENT To enhance and protect the built environment including the townscape and landscape and ensure new buildings and spaces are well designed and enhance local character	Areas of townscape and landscape interest	<p>Will the quality of the townscape and landscape be improved?</p> <p>What design measures will be incorporated?</p> <p>Will an appropriate density be achieved?</p> <p>How has the height of buildings been considered?</p>	<ul style="list-style-type: none"> • No. of Building for Life Assessments • Amount of new amenity space provided • Density of development
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings	Number of protected heritage assets	<p>Will areas and buildings of historic interest be protected and enhanced?</p> <p>Will there be an impact upon archaeological priority zones?</p> <p>Will there be an impact upon statutory and local listed buildings?</p>	<ul style="list-style-type: none"> • No. of listed buildings and heritage assets on the at risk register • Number and extent of protected areas within or near Plan area including Conservation Areas; Archaeological Priority Zones; historic parks • No. of conservation areas with up to date management plans within or near the Plan area

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
SO13	<p>ENERGY & CARBON</p> <p>To ensure specific measures to improve energy efficiency and reduce greenhouse gas emissions are used in developments.</p>	Energy Efficiency of new developments	<p>What sources of renewable energy will be incorporated?</p> <p>What sustainable energy systems/ measures will be used?</p> <p>Will the energy performance of existing dwellings be improved?</p> <p>Will development provide for future changes in energy provision?</p> <p>Has the urban heat island been considered?</p> <p>What is the capacity of the infrastructure?</p>	<ul style="list-style-type: none"> CO emissions and energy consumption by type/source Thermal efficiency of housing stock No./type of renewable sources of energy No. of developments connected to decentralised energy networks
SO14	<p>OPEN SPACE</p> <p>To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space (including play and recreation areas).</p>	Amount of accessible open space	<p>Will sufficient on-site amenity and open space be provided?</p> <p>Will spaces of amenity and recreational value be protected and enhanced?</p> <p>Will there be a loss or increase in provision?</p>	<ul style="list-style-type: none"> Areas of open space deficiency Amount of new space created (Ha) Areas of deficiency in nature Any changes, including access to SINCS or LNRs
SO15	<p>WASTE</p> <p>Promote waste minimisation by re-use and recycling in line with reducing net carbon emissions and the waste hierarchy; and to recover the maximum value from residual waste by increasing energy derived from residual waste.</p>	Reduction in the amount of waste in construction and operation	<p>What waste minimisation measures have been considered during demolition, construction and operation?</p> <p>Will appropriate waste recycling and storage facilities be provided?</p> <p>Will sustainable materials and construction methods be incorporated e.g. Considerate Constructors scheme?</p>	<ul style="list-style-type: none"> Amount of municipal waste sent to landfill (tonnes) %age of municipal waste sent for reuse, recycling and composting (by sector) No. of construction plans submitted with consideration of waste reduction & recycling

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
SO16	<p>HOUSING</p> <p>Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.</p>	Amount of housing delivered per annum	<p>Will the amount of affordable housing available be increased?</p> <p>Will a mix of housing types and tenures be achieved?</p> <p>Will the condition and diversity of the housing stock be improved?</p> <p>Will there be a provision for lifetime homes?</p> <p>Will the development assist Merton in achieving its housing delivery target?</p>	<ul style="list-style-type: none"> No. of homes in the borough by type and tenure No. of people in housing need No. of non-decent or 'unfit' homes on estates No. of households in overcrowded properties Income to average house price ratio No./type of new dwelling p/annum
SO17	<p>ACCESS TO ACTIVITIES</p> <p>Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.</p>	Access to culture, leisure and social activities	<p>Have the key activities available been identified?</p> <p>Will access to activities be maintained and improved?</p>	<ul style="list-style-type: none"> No./type/capacity of activity within 5-10 mins walk (400-800 m) Public transport accessibility to activities Activities available within the estates
SO18	<p>SOCIAL DEPRIVATION</p> <p>To contribute to reducing poverty and encouraging social inclusion.</p>	Level of poverty and deprivation	<p>Will the development contribute to a reduction in poverty and social deprivation?</p> <p>How will fuel poverty be addressed?</p>	<ul style="list-style-type: none"> No. of households in poverty by ward Rank of social deprivation by ward/borough %age of population of working age claiming key benefits
SO19	<p>HEALTH & WELLBEING</p> <p>To improve the health and wellbeing of residents and reduce health inequalities.</p>	Life expectancy	<p>How will health inequalities be addressed?</p> <p>Will healthy lifestyles be encouraged through the design and layout of the development?</p> <p>Will access to essential health services be improved?</p>	<ul style="list-style-type: none"> Mortality rates %of population with limiting long term illness Indices of multiple deprivation: health deprivation and disability No./type/capacity of health facilities available nearby

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
SO20	DIVERSITY & EQUALITY To support diversity and equality in order to promote community cohesion.	Level of Community Cohesion	<p>Will mixed, balanced and sustainable communities be created?</p> <p>Will a sense of cultural identity, belonging and well-being be achieved?</p> <p>Will support be provided for people from different equality groups?</p>	<ul style="list-style-type: none"> • %age of population in ethnic groups • No. of households by equality group
SO21	SERVICES & FACILITIES To ensure accessibility to essential services and facilities.	Number and capacity of services and facilities	<p>Will access to essential services and facilities be maintained and improved?</p> <p>Is the capacity of the existing services and facilities adequate e.g. Health, Education?</p> <p>Are there any services or facilities that are not currently accessible?</p> <p>Will new services and facilities be required?</p>	<ul style="list-style-type: none"> • Distance in metres to essential services • No./type/Capacity of existing services and facilities
SO22	CRIME To reduce crime and the fear of crime.	Crime levels	<p>What design measures will be used to address crime and anti-social behaviour?</p> <p>Will 'Secured by Design' principles be used?</p>	<ul style="list-style-type: none"> • Total no. of offences • Annual incident rate per 1,000 residents by type or crime • Indices of multiple deprivation: crime and disorder figures • No. of applications including 'Secured by Design'
SO23	EDUCATION & SKILLS To improve the education and skills of the population.	Level of educational attainment	<p>What measures will be included to help improve the qualifications and skills of the population?</p> <p>What measures will be included to help difficult to reach groups access education and skills opportunities?</p>	<ul style="list-style-type: none"> • Proportion of pupils achieving 5+ GCSEs at A-C, including English & Maths by equality group • % of population with no qualifications • % of populations with HE educational Attainment • level of access to education • No. /type of apprenticeships p/annum

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
SO24	ECONOMIC GROWTH To support economic growth and business development	Level of economic growth	Will the development support economic growth? Will local employment and training opportunities be provided? Will the different needs of the community be met?	<ul style="list-style-type: none"> • % employment growth rates by sector • No./% of jobs by sector • % of working age self-employed
SO25	EMPLOYMENT To increase local employment and skills and reduce unemployment	Level of employment	Will new employment opportunities be created? Will the jobs created be in different sectors and be temporary or permanent? Will the jobs created provide opportunities for local people?	<ul style="list-style-type: none"> • Indices of multiple deprivation: employment and income deprivation • No. of people employed/unemployed by sector • No. of local people employed by sector
SO26	VIABILITY & DELIVERABILITY To ensure the deliverability of viable development	Number of homes delivered	Will the development be viable? Will the development be deliverable?	<ul style="list-style-type: none"> • No. of homes delivered • No. of new services and facilities • No. of new jobs created • No. of travel and transport measures supported

7 Estate Local Plan Objectives and Options

7.1 Assessment of Plan Objectives against SA Framework

- 7.1.1 The plan objectives were assessed against the sustainability objectives to check their compatibility. The assessment shows that the ELP objectives are largely compatible. Two areas of potential incompatibility were found with regards to ELP Objective 3 - To Provide New Homes and Infrastructure and ELP 4 - To Make Merton more Prosperous, which score uncertain impacts against the majority of the Sustainability Objectives.
- 7.1.2 The building of new homes is likely to have a negative impact on climate change and resources owing to the increase in CO₂ emissions and waste that will be produced. However, mitigation of potential negative impacts should be considered in the SA of the options and policies and through the design and approach to development, which will be managed by development management policies, in the application of the plan.
- 7.1.3 Where uncertain relationships were found, the likely impact could be positive or negative depending on implementation. These impacts have been shown to highlight any potential incompatibilities and for suitable mitigation measures to be identified during the SA process.

The full results can be found in [Appendix A4](#)

7.2 Development of the Plan Options

Issues and Options SA, 2014

7.2.1 The Council consulted on the Issues and options for the estates in November 2014. Residents of all three estates were asked the following questions:

1. Should all homes on the estate be redeveloped?
 - Option 1: Demolish and redevelop the entire estate
 - Option 2: Partial redevelopment
 - Option 3: Invest in existing properties to bring them to modern standards
 - Option 4: Other
2. What size of homes should be provided within the Estate?
 - Option 1: Mix of different sized homes (33% 1 bed: 32% 2 bed: 35% 3 bed +)
 - Option 2: If you do not agree with this mix, how would you change it?
3. What type of homes should be provided across the estate?
 - Option 1: A mix of mainly houses and flats on different parts of the estate
 - Option 2: A wide range of homes including a mix of houses, flats and maisonettes
 - Option 3: Mostly flats
 - Option 4: Other
4. How should building heights be distributed through the estate?
 - Option 1: Evenly across the estate
 - Option 2: Taller buildings around the edges
 - Option 3: Variety across the estate
5. Are there any other issues or options we should consider regarding new homes?
6. What type of outdoor space would you prefer to see within the estate?
 - Option 1: Concentrate on providing communal space for flats
 - Option 2: Provide a single public open space for everyone to enjoy
 - Option 3: Other
7. What types of play areas and outdoor space would you prefer to see?
 - Option 1: Sports pitches
 - Option 2: Multi-use games areas
 - Option 3: Communal gardens
 - Option 4: Children's play equipment
 - Option 5: Other
8. What do you think is important in deciding the layout of buildings, spaces and streets on the estate?
 - Option 1: Make easy connections within the estate and to the surrounding area
 - Option 2: Create traditional street forms
 - Option 3: Retain a similar feel to the current character of the area
 - Option 4: Create a mixture of types of buildings and spaces
 - Option 5: Other
9. Are there any other issues or options we should consider regarding the estate's open space and streets?
10. How should greater use of public transport be encouraged?
 - Option 1: Provide better bus facilities
 - Option 2: Provide better walking routes, bus and tram stops, shopping areas, parks and community facilities
 - Option 3: Provide incentives to help residents use public transport more
 - Option 4: Provide personal travel advice
 - Option 5: Other
11. Walking and cycling are healthy lifestyle choices. How can we support this?
 - Option 1: Provide well connected, attractive and safe cycle routes and footpaths
 - Option 2: Provide safe and convenient crossings of busy roads and junctions
 - Option 3: provide secure and convenient cycle storage
 - Option 4: Provide cycle training and support to encourage people to switch to cycling
12. How should parking be managed?
 - Option 1: introduce parking controls
 - Option 2: No parking restrictions

13. Are there any other issues or options we should consider regarding the transport?
14. Should new community facilities be provided within the estate?
 - Option 1: Yes, we need more community facilities such as
 - Option 2: No, the existing community facilities on the estate and nearby are enough
15. How could refurbishment or regeneration support existing and new employment?
 - Option 1: Provision of space for businesses on or near the estate
 - Option 2: Employ local businesses and apprentices through the refurbishment or regeneration process
 - Option 3: Other

A summary of the results of the consultation can be found on the Council website <http://www.merton.gov.uk/estatesplan>

The [Issues and Options SA](#) report assessed the options above but concluded that there wasn't enough information to fully assess the impacts of each option against several of the objectives. The SA recognised that further assessments would be required as the Plan and the proposals progress and more detailed information becomes available.

[Draft Estates Local Plan SA, 2016](#)

- 7.2.3 An SA of the Draft Estates Local Plan was published in February 2016 alongside the draft Plan. The SA focussed on the proposed policies within the Plan. An assessment of the Options considered was not included at this stage.
- 7.2.6 As a result of consultation on the draft Estates Local Plan, Savills made a representation on behalf of Clarion, which stated:

'It is noted that the draft Strategic Environmental Assessment (SA/SEA), which underpins the Plan does not consider the three options for the Estates, being complete regeneration, enhanced refurbishment and Decent Homes Standard refurbishment. The SEA needs to fully consider the alternatives to regeneration and discount them.'

[SA of the Submission Draft Estates Local Plan, 2016](#)

- 7.2.7 As a result of the representations on the Draft Estates Local Plan, the Council commissioned Jam Consult Ltd to review the SA work undertaken in relation to the ELP, with specific attention to the selection of options.
- 7.2.8 The review of the sustainability appraisals and supporting documents found there were some defects in the SA process, which needed to be corrected if the ELP was to be considered suitably robust when subjected to Examination in Public (EiP).
- 7.2.9 In particular, the review found the assessment of options should be revisited in respect of the representations received. It was also recognised that the results of the assessment could be strengthened, by providing greater links to the supporting evidence. The SA would also enable greater clarity to be provided on the reasons for the selection and rejection of alternatives.
- 7.2.10 In carrying out the SA of the Estates Local Plan, the SA has drawn on the information prepared in the 'Case for Regeneration' reports prepared by Savills on behalf of Clarion and the supporting technical documents prepared by independent consultants that were used to inform the findings.

7.3 Selection and Rejection of Options

7.3.1 The option of 'do nothing' or 'no plan' was considered but rejected for all the estates. Aside from Clarion's commitments to improving the quality of life of its tenants, under the provision of the Stock Transfer Agreement with the Council, Clarion is legally bound to refurbish the condition of the existing stock as a minimum. As a consequence, the option to 'do nothing' was not considered a reasonable alternative and was not considered further.

7.3.2 The following Options were considered in the Case for Regeneration prepared by Savills, September 2015 (updated October 2016), which have been assessed in the SA.

Option 1 – Refurbishment to Decent Homes (Merton Standard)

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

Option 2 – Refurbishment to an Enhanced Standard;

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

Option 3 – Full Redevelopment (Eastfields and High Path)

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

Option 3 – Partial Redevelopment (Ravensbury)

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

Rejection of Partial Redevelopment of Eastfields and High Path Estates

7.3.4 Following the Issues and Option consultation, Clarion concluded that partial regeneration was not a viable proposal for either the High Path or Eastfields estates. The reason for this decision was because the estates cannot be divided easily into separate areas to be redeveloped and refurbished in the same way that is possible at the Ravensbury Estate. This issue is most obvious at Eastfields, where the estate's construction as a continuous perimeter block does not allow for its partial redevelopment.

7.3.5 With regard to High Path, the urban design and layout of the estate does not lend itself to partial regeneration. For example, the worst performing homes are considered to be the three twelve storey blocks, which house 198 homes and comprise almost a third of the estate. The blocks occupy a very small site area, which would provide a very small footprint available for redevelopment, constraining the scope for increased density and improvements to the urban design across the estate.

7.3.6 Partial redevelopment of the High Path and Eastfields estates would not offer the best opportunity to deliver a high quality residential development that optimises the use of the land to deliver a high quality residential development.

Rejection of Full Redevelopment of Ravensbury Estate

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

Assessment of Options

- 7.3.12 The Options set out above have been assessed against the revised SA framework. The results are summarised in [Section 8](#) of this report and can be viewed in full in [Appendix A5](#)

8 Sustainability Effects of the Plan

8.1 How has sustainability been considered in the development of the Plan?

8.1.1 Sustainability has been considered from the outset of the development of the plan and has been subject to sustainability assessment throughout, including the following documents:

- Scoping Report, 2014
- Issues and Options Sustainability Appraisal, 2014
- Draft Estates Local Plan, February 2016
- Draft Estates Local Plan SA, February 2016
- Submission Draft Estates Local Plan, November 2016
- SA of the Submission Draft Estates Local Plan, November 2016
- SA of the Submission Version Estates Local Plan, March 2017 (this document)

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

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

8.1.3 Separate visions have been developed for each estate, which have drawn on the positive characteristics within and surrounding each area as set out below:

Eastfields: Contemporary Compact Neighbourhood

A new neighbourhood which demonstrates innovative design by maintaining a distinctive character through the creation of a contemporary architectural style encompassing a variety of types, sizes and heights for new homes overlooking traditional streets and the improvement of links to the surrounding area.

High Path: New London Vernacular

The creation of a new neighbourhood with traditional streets and improved links to its surroundings, that supports the existing local economy while drawing on the surrounding area’s diverse heritage and strong sense of community. Buildings will be of a high quality internally and externally, have a consistency in design with a strongly urban form and character, optimising the most efficient use of land that makes the most of the excellent transport services and has access to quality amenity space.

Ravensbury: Suburban Parkland Setting

The creation of a new neighbourhood that is part of the wider parkland and which protects and enhances landscape quality and biodiversity. Characterised by buildings arranged as traditional streets and spaces that improve links to the surrounding area, allow for the landscape to penetrate the site whilst simultaneously improving flood mitigation and increasing the number of homes whilst retaining the character of its suburban parkland setting.

8.2 Sustainability Effects of the Options

- 8.2.1 An assessment of the Options identified in the [Case for Regeneration, September 2015 \(updated October 2016\)](#) prepared by Savills on behalf of Clarion has been carried out against the revised SA Framework. Details of the assessment can be found in [Appendix A5](#). A summary of the results is set out below.

EASTFIELDS

8.2.2 Option 1: Refurbishment to Decent Homes (Merton Standard) and Option 2: Refurbishment to Enhanced Standard

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

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

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

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

Option 3: Full Redevelopment

8.2.3 Positive impacts:

The redevelopment of the estate enables the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.

The redevelopment offers the opportunity to improve the quality of provision and enhance the biodiversity of the site and surrounding area through measures such as green corridors, ecological enhancement and the use of green/brown roofs. The mature trees should be protected where possible.

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

8.2.4 Uncertain Impacts:

A culverted watercourse at the eastern boundary of the estate offers the opportunity to create a swale, which would assist in reducing runoff and could help improve water quality by acting as a filter to help remove pollutants and suspended solids. There is a need to improve the biological and chemical status of the River Wandle to good by 2027, in order to comply with the Water Framework Directive. The redevelopment will enable water saving measures to be incorporated into the new accommodation to meet best practice standards and for water meters to be installed. The need for additional sewerage capacity will need to be considered to address the increase in population.

The Site is within Flood Zone 1 (less than 0.1% annual probability) and has no recent historic record of fluvial flooding, however the site has a high risk of surface water flooding. The redevelopment of the site offers the opportunity to increase the density of housing in a low flood risk area and the introduction of SuDS to help mitigate against surface water flooding. Any development will be subject to a Sequential Test and site specific Flood Risk Assessment in accordance with the NPPF, which must have regard to Merton's Strategic Flood Risk Assessment and Surface Water Management Plan.

Merton is an AQMA. The redevelopment may result in adverse impacts as a result of demolition, construction and an increase in traffic. An Air Quality Impact Assessment will be required as part of any future planning application to ensure suitable mitigation measures have been identified. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term. The redevelopment may have an adverse impact in the short to medium term during construction, however suitable mitigation measures, such as hours of work, should minimise likely disruption.

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

Financial modelling has been carried out over a 50 year period. The redevelopment would involve a greater level of up-front cost than options 1 and 2 but would deliver the greatest regeneration benefits that would last for the long term. The current modelling shows that this option is the most economic and deliverable. Further work on the modelling is on-going, including the potential to incorporate units for private occupation to enhance the overall viability.

A detailed phasing and decanting plan will also need to be developed. There are no sites on the estate that offer the opportunity to build new housing. Sites adjacent to the estate will therefore need to be considered, which could provide Phase 1 of the redevelopment and the opportunity for decanting of existing residents. Further information on the phasing and decanting will need to be considered as it becomes available.

8.2.5 Negative Impacts

Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design and construction practices should be identified. The current condition of the stock is significantly below Building Regulations and Decent Home Standards. The redevelopment of the estate will enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties.

The estate currently has a PTAL rating of 2 (poor) with poor accessibility to the surrounding area and poor layout and connectivity through the site for all modes of transport. The redevelopment offers the opportunity to improve accessibility to Mitcham Eastfields Railway Station and wider area as well as the internal layout, which will need to be considered further in the detailed design and Transport Assessment.

The redevelopment will increase waste in the demolition, construction and operation of the development. Waste minimisation plans will need to be put in place that encourage the recycling or reuse of materials in construction, the selection of sustainable materials and the design of suitable recycling and waste storage systems for the operation of the development.

HIGH PATH

8.2.6 Option 1: Refurbishment to Decent Homes (Merton Standard) and Option 2: Refurbishment to Enhanced Standard

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

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

The current condition of the stock is significantly below Building Regulations and Decent Home Standards. Whilst there is likely to be a minor positive impact in the short term, the improvements will not enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term.

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

Option 3: Full Redevelopment

8.2.7 Positive impacts:

The redevelopment of the estate enables the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.

The Geotechnical and Geo-environmental Study identifies that there is moderate likelihood for contamination within the estate, to be expected with brownfield land, it does not identify any factors that should prevent the potential for redevelopment or onerous cost implications.

The redevelopment offers the opportunity to improve the quality of provision and enhance the biodiversity of the site and surrounding area through measures such as green corridors, ecological enhancement and the use of green/brown roofs. The mature trees should be protected where possible.

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

8.2.8 Uncertain Impacts:

The site is predominantly Flood Zone 1 (less than 0.1% annual probability) with part of the western end of the site is Flood Zone 2 (0.1-1% annual probability) and is considered to have a low likelihood of flooding. However, historic surface water flooding has occurred in and around the estate. The introduction of SuDS will help mitigate against surface water flooding and alleviate flows to the existing sewer network, which is at capacity. Any development will be subject to a Sequential Test, Exceptions Test and site specific FRA in accordance with the NPPF, which must have regard to Merton's Strategic Flood Risk Assessment and Surface Water Management Plan.

The redevelopment will enable water saving measures to be incorporated into the new accommodation to meet best practice standards and for water meters to be installed. The need for additional sewerage capacity will need to be considered to address the increase in population.

Merton is an AQMA. The redevelopment may result in adverse impacts as a result of demolition, construction and an increase in traffic. An Air Quality Impact Assessment will be required as part of any future planning application to ensure suitable mitigation measures have been identified. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term. The redevelopment may have an adverse impact in the short to medium term during construction, however suitable mitigation measures, such as hours of work, should minimise likely disruption.

The estate currently has a PTAL rating of between 4 (good) and 6a (very good) and is well located strategically with strong links to tube, train and bus services, as well as the potential extension of the tram in the future. The estate performs well internally for pedestrians but has few good logical connections to the wider strategic network. The redevelopment offers the opportunity for improving the integration and connectivity of pedestrian routes to the wider area, particularly facilities, through the redesign of the internal spatial structure. Increased density will increase pressure on existing public transport provision and will need to be assessed. The improvements to connectivity will also need to be considered further in the detailed design and TA.

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

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

Financial modelling has been carried out over a 50 year period. The redevelopment would involve a greater level of up-front cost than options 1 and 2 but would deliver the greatest regeneration benefits that would last for the long term. The current modelling shows that this option is the most economic and deliverable. Further work on the modelling is on-going, including the potential to incorporate units for private occupation to enhance the overall viability.

A detailed phasing and decanting plan will also need to be developed. A garage site on the site offers the opportunity to build new housing, which could provide Phase 1 of the redevelopment and the opportunity for decanting of existing residents. Further information on the phasing and decanting will need to be considered as it becomes available.

8.2.9 Negative Impacts

Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.

The current condition of the stock is significantly below Building Regulations and Decent Home Standards. The redevelopment of the estate will enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties.

The redevelopment will result in waste in the demolition, construction and operation of the development. Waste minimisation plans will need to be put in place that encourage the recycling or reuse of materials in construction, the selection of sustainable materials and the design of suitable recycling and waste storage systems for the operation of the development.

RAVENSBURY

8.2.10 Option 1: Refurbishment to Decent Homes (Merton Standard) Option 2: Refurbishment to Enhanced Standard

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

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

The current condition of the stock is significantly below Building Regulations and Decent Home Standards. Whilst there is likely to be a minor positive impact in the short term, the improvements will not enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term.

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

Option 3: Partial Redevelopment

8.2.11 Positive impacts:

The partial redevelopment of the estate enables the use of the land to be optimised to provide an increase in the quantity and quality of accommodation to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth. The redevelopment would make more efficient use of the land, as well as offering the replacement of the Orlit Homes, which are of a defective type of construction. The partial redevelopment offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards and improve the urban design, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.

The Geotechnical and Geo-environmental Study identifies that there is moderate likelihood for contamination within the estate, to be expected with brownfield land, it does not identify any factors that should prevent the potential for redevelopment or onerous cost implications. The redevelopment offers the opportunity to improve the quality of provision and enhance the biodiversity of the site and surrounding area through measures such as green corridors, ecological enhancement and the use of green/brown roofs. The mature trees should be protected where possible.

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

8.2.12 Uncertain Impacts:

The site is mainly in Flood Zone 2 with some areas of Flood Zones 3a and 3b and is in the functional floodplain of the River Wandle, although there is no recorded history of the site being flooded. The partial redevelopment would result in a higher concentration of dwellings in the functional floodplain. However, the site is already developed for residential use and new development would offer the potential to incorporate mitigation measures such as setting accommodation at 300mm above the relevant 1% annual probability flooding event (including climate change allowance). A SuDS strategy would also need to be developed to provide on site attenuation and manage surface water runoff. Any development will be subject to a Sequential Test and Exceptions Test and site specific FRA in accordance with the NPPF, which must have regard to Merton's Strategic Flood Risk Assessment and Surface Water Management Plan.

The redevelopment will enable water saving measures to be incorporated into the new accommodation to meet best practice standards and for water meters to be installed. The need for additional sewerage capacity will need to be considered to address the increase in population.

Merton is an AQMA. The redevelopment may result in adverse impacts as a result of demolition, construction and an increase in traffic. An Air Quality Impact Assessment will be required as part of any future planning application to ensure suitable mitigation measures have been identified. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term. The redevelopment may have an adverse impact in the short to medium term during construction, however suitable mitigation measures, such as hours of work, should minimise likely disruption.

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

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

Financial modelling has been carried out over a 50 year period. The redevelopment would involve a greater level of up-front cost than options 1 and 2 but would deliver the greatest regeneration benefits that would last for the long term. The current modelling shows that this option is the most economic and deliverable. Further work on the modelling is on-going, including the potential to incorporate units for private occupation to enhance the overall viability.

A detailed phasing and decanting plan will also need to be developed. A garage site on the site offers the opportunity to build new housing, which could provide Phase 1 of the redevelopment and the opportunity for decanting of existing residents. Further information on the phasing and decanting will need to be considered as it becomes available.

8.2.13 Negative Impacts:

Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified. The current condition of the stock is significantly below Building Regulations and Decent Home Standards. The redevelopment of the estate will enable climate mitigation and adaptation measures to be introduced that will reduce CO₂ emissions for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties.

The estate currently has a PTAL rating of between 2-3 (poor) and is a relatively isolated location. The estate is bounded by; the river, parks and railway line, providing the feeling of a segregated enclave and reliance on the private car. Potential for significant improvements to connectivity are relatively limited and will need to be considered further in the detailed design and TA. The redevelopment offers the opportunity to improve accessibility to the wider area as well as the internal layout, which will need to be considered further in the proposals.

The redevelopment will increase waste in the demolition, construction and operation of the development. Waste minimisation plans will need to be put in place that encourage the recycling or reuse of materials in construction, the selection of sustainable materials and the design of suitable recycling and waste storage systems for the operation of the development.

Summary Results of Options

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

Key

Red	Major negative impact
Orange	Minor negative impact
Yellow	Uncertain impact
Light Green	Minor positive impact
Dark Green	Major positive impact
Grey	No significant impact

8.3 Summary Findings of the Options

- 8.3.1 The assessment of the Options has shown for all the estates that whilst Options 1 and 2 would improve the quality of the housing stock, it would not enable the use of the land to be optimised to provide an increase in the quantity of accommodation on the Estates to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable housing.
- 8.3.2 Furthermore, the refurbishment would involve significant costs in the short term to bring the properties up to the appropriate standard, however the benefits would only be of short-term benefit. Significant further investment would be required in the longer term to maintain the properties at a liveable standard.
- 8.3.3 **Option 1: Refurbishment to Decent Homes (Merton Standard) and Option 2: Refurbishment to Enhanced Standard are therefore not considered to be suitable options for the regeneration of the estates.**
- 8.3.4 Option 3 would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need and overcrowding. The redevelopment/partial redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development. The redevelopment also provides opportunities for the layout, urban design and landscape of the areas to be improved, including accessibility to the surrounding area and facilities.
- 8.3.5 It is important to note that the regeneration of the Eastfields, High Path and Ravensbury Estates is considered as a single project for economic purposes by Clarion and as such the financial deliverability of the regeneration of the three Estates is interlinked. High Path is the value driver and therefore the financial benefits of the regeneration of the High Path Estate are to be used to enable the regeneration of the Eastfields and Ravensbury Estates.
- 8.3.6 The regeneration of the Estates over the 50 year life cycle would deliver the greatest regeneration benefits having regard to Clarion's vision and planning policy requirements, including the housing, socio-economic, place making and environmental benefits identified within this report. Regeneration therefore presents the most sensible and sustainable solution.
- 8.3.7 Furthermore, Clarion is an affordable housing provider who has funding in place to deliver better quality affordable housing compared to current standards, which is the key driver for the regeneration. Extensive work has been undertaken on the emerging regeneration proposals, to incorporate homes for private occupation into the schemes to enhance the overall viability and this will continue.
- 8.3.8 Greater clarity will be needed on the viability and deliverability of the proposals, and the phasing and decanting proposals. Proposals will need to be drawn up which minimise the disruption to existing residents as far as possible. Further work will also be needed to examine the specific issues that relate to each estate in order to determine how they can be addressed in the design proposals to achieve sustainable development.

9 The Estates Local Plan Policies

9.1 Development of the Plan Policies

9.1.1 The Post Examination Modifications Estates Local Plan contains a number of policies, which will be used in the determination of the planning applications for the detailed proposals of the estates. As a result of the Examination in Public, three overarching policies have been added to the ELP: OEP1 Vision; OPE2 Strategy and OEP3 Urban Design. The policies do not add anything new to the plan but have largely been taken from supporting text within the Submission Version. An assessment of the Plan Policies has been carried out against the revised SA framework, including the new policies for completeness. The full results can be found in [Appendix A6](#). A summary of the results is set out below.

9.2 Sustainability effects of the Policies

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

9.2.3 Tables showing a summary of results for the policies are attached overleaf. The full results can be found in [Appendix A6](#).

Summary Results of ELP Policies

Sustainability Objectives		OVERARCHING POLICIES				Policies	
		OEP1	OEP2	OEP3		OEP1	Policy
SO1	LAND USE					OEP1	Vision
SO2	CLIMATE CHANGE					OEP2	Strategy
SO3	WATER QUALITY					OEP3	Urban Design
SO4	WATER RESOURCES						
SO5	SOIL AND LAND QUALITY						
SO6	AIR QUALITY						
SO7	NOISE						
SO8	TRANSPORT						
SO9	FLOOD RISK						
SO10	BIODIVERSITY						
SO11	BUILT ENVIRONMENT						
SO12	HISTORIC ENVIRONMENT						
SO13	ENERGY & CARBON						
SO14	OPEN SPACE						
SO15	WASTE						
SO16	HOUSING						
SO17	ACCESS TO ACTIVITIES						
SO18	SOCIAL DEPRIVATION						
SO19	HEALTH & WELLBEING						
SO20	DIVERSITY & EQUALITY						
SO21	SERVICES & FACILITIES						
SO22	CRIME						
SO23	EDUCATION & SKILLS						
SO24	ECONOMIC GROWTH						
SO25	EMPLOYMENT						
SO26	VIABILITY / DELIVERABILITY						

Sustainability Objectives		EASTFIELDS POLICIES								Policies	
		E1	E2	E3	E4	E5	E6	E7	E8		
SO1	LAND USE									E1	Townscape
SO2	CLIMATE CHANGE									E2	Street Network
SO3	WATER QUALITY									E3	Movement & Access
SO4	WATER RESOURCES									E4	Land Use
SO5	SOIL & LAND QUALITY									E5	Open Space
SO6	AIR QUALITY									E6	Environ. Protection
SO7	NOISE									E7	Landscape
SO8	TRANSPORT									E8	Building Heights
SO9	FLOOD RISK										
SO10	BIODIVERSITY										
SO11	BUILT ENVIRONMENT										
SO12	HISTORIC ENVIRONMENT										
SO13	ENERGY & CARBON										
SO14	OPEN SPACE										
SO15	WASTE										
SO16	HOUSING										
SO17	ACCESS TO ACTIVITIES										
SO18	SOCIAL DEPRIVATION										
SO19	HEALTH & WELLBEING										
SO20	DIVERSITY & EQUALITY										
SO21	SERVICES & FACILITIES										
SO22	CRIME										
SO23	EDUCATION & SKILLS										
SO24	ECONOMIC GROWTH										
SO25	EMPLOYMENT										
SO26	VIABILITY/DELIVERABILITY										

Sustainability Objectives		HIGH PATH POLICIES								Policies	
		H1	H2	H3	H4	H5	H6	H7	H8		
SO1	LAND USE									H1	Townscape
SO2	CLIMATE CHANGE									H2	Street Network
SO3	WATER QUALITY									H3	Movement & Access
SO4	WATER RESOURCES									H4	Land Use
SO5	SOIL & LAND QUALITY									H5	Open Space
SO6	AIR QUALITY									H6	Environ. Protection
SO7	NOISE									H7	Landscape
SO8	TRANSPORT									H8	Building Heights
SO9	FLOOD RISK										
SO10	BIODIVERSITY										
SO11	BUILT ENVIRONMENT										
SO12	HISTORIC ENVIRONMENT										
SO13	ENERGY & CARBON										
SO14	OPEN SPACE										
SO15	WASTE										
SO16	HOUSING										
SO17	ACCESS TO ACTIVITIES										
SO18	SOCIAL DEPRIVATION										
SO19	HEALTH & WELLBEING										
SO20	DIVERSITY & EQUALITY										
SO21	SERVICES & FACILITIES										
SO22	CRIME										
SO23	EDUCATION & SKILLS										
SO24	ECONOMIC GROWTH										
SO25	EMPLOYMENT										
SO26	VIABILITY/DELIVERABILITY										

Sustainability Objectives		RAVENSBURY POLICIES								POLICIES	
		R1	R2	R3	R4	R5	R6	R7	R8		
SO1	LAND USE	Green	Green	Green	Green	Green	Green	Green	Green	R1	Townscape
SO2	CLIMATE CHANGE	Grey	Grey	Grey	Orange	Yellow	Orange	Green	Grey	R2	Street Network
SO3	WATER QUALITY	Grey	Grey	Grey	Orange	Green	Yellow	Green	Grey	R3	Movement & Access
SO4	WATER RESOURCES	Grey	Grey	Grey	Yellow	Grey	Yellow	Grey	Grey	R4	Land Use
SO5	SOIL & LAND QUALITY	Grey	Grey	Grey	Yellow	Green	Yellow	Green	Grey	R5	Open Space
SO6	AIR QUALITY	Grey	Grey	Grey	Yellow	Grey	Yellow	Green	Grey	R6	Environ. Protection
SO7	NOISE	Grey	Grey	Grey	Yellow	Grey	Yellow	Green	Grey	R7	Landscape
SO8	TRANSPORT	Grey	Green	Green	Yellow	Grey	Yellow	Grey	Grey	R8	Building Heights
SO9	FLOOD RISK	Grey	Green	Grey	Yellow	Yellow	Yellow	Yellow	Grey		
SO10	BIODIVERSITY	Grey	Grey	Grey	Green	Green	Green	Green	Grey		
SO11	BUILT ENVIRONMENT	Green	Green	Green	Green	Green	Yellow	Green	Green		
SO12	HISTORIC ENVIRONMENT	Green	Green	Grey	Yellow	Yellow	Yellow	Grey	Green		
SO13	ENERGY & CARBON	Grey	Grey	Grey	Orange	Grey	Orange	Grey	Grey		
SO14	OPEN SPACE	Green	Grey	Green	Green	Green	Green	Green	Green		
SO15	WASTE	Grey	Grey	Grey	Orange	Grey	Orange	Grey	Grey		
SO16	HOUSING	Grey	Grey	Grey	Green	Green	Green	Grey	Green		
SO17	ACCESS TO ACTIVITIES	Green	Green	Green	Yellow	Green	Green	Green	Grey		
SO18	SOCIAL DEPRIVATION	Grey	Grey	Grey	Green	Grey	Yellow	Grey	Grey		
SO19	HEALTH & WELLBEING	Grey	Green	Green	Green	Green	Yellow	Grey	Grey		
SO20	DIVERSITY & EQUALITY	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey		
SO21	SERVICES & FACILITIES	Grey	Green	Grey	Green	Grey	Grey	Grey	Grey		
SO22	CRIME	Green	Green	Grey	Green	Green	Yellow	Green	Grey		
SO23	EDUCATION & SKILLS	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey		
SO24	ECONOMIC GROWTH	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey		
SO25	EMPLOYMENT	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey		
SO26	VIABILITY/DELIVERABILITY	Grey	Grey	Grey	Yellow	Grey	Yellow	Grey	Yellow		

9.3 Cumulative Impacts

Major Positive impacts

9.3.1 The cumulative impacts for Option 3 of all the estates receive a major positive impact in relation to the following objectives:

- Land Use
- Built Environment
- Open Space
- Housing
- Access to Activities
- Social Deprivation
- Crime

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

9.3.2 The cumulative impacts for all policies receive a major positive impact in relation to Housing as again they will enable the Borough to meet the current housing needs and projected changes in population growth.

Positive impacts

9.3.3 Positive impacts are received for Option 3 in relation to the following objectives:

- Water resources
- Soil and Land Quality
- Biodiversity
- Energy and Carbon
- Diversity and Equality
- Education and skills
- Economic Growth
- Employment

9.3.4 The cumulative impacts for all the policies are positive for the following objectives:

- Land use
- Biodiversity
- Built environment
- Open Space
- Access to activities
- Social Deprivation
- Health & Wellbeing
- Diversity and Equality
- Services and Facilities
- Crime
- Economic Growth
- Employment

- 9.3.5 The regeneration of the estates is likely to result in a cumulative positive impact for the above effects because of the improvements to the quality of the buildings and environment that will result.

Negative Impacts

- 9.3.6 The cumulative impacts for Option 3 receive a negative impact for Climate Change and Waste. The level of regeneration on the estates will result in an increase in greenhouse gas emissions and waste generated. The policies also receive a negative impact regarding energy and carbon as the regeneration will also result in an increase in energy consumption. Mitigation measures will need to be identified to minimise any adverse impact in accordance with the plan policies.

Uncertain Impacts

- 9.3.7 The cumulative effects for Option 3 receive an uncertain impact for the following objectives:

- Water quality
- Air quality
- Noise
- Transport
- Flood Risk
- Historic Environment
- Health and wellbeing
- Services and Facilities
- Viability and deliverability

- 9.3.8 The Policies receive an uncertain effect for the following objectives:

- Water quality
- Water resources
- Soil and land quality
- Air Quality
- Noise
- Transport
- Flood Risk
- Historic environment
- Viability and deliverability

- 9.3.9 The uncertainty of the impacts should be reduced through the design of the proposals. The proposals will need to give due consideration to the above issues to ensure that the regeneration addresses them appropriately.

No significant impact

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

The detailed results can be found in [Appendix A8](#).

9.4 Proposed mitigation measures

- 9.4.1 The policies of the London Plan, Core Planning Strategy and the Sites and Policies Plan will need to be taken into consideration with regard to all development as well as the Estates Local Plan.

Air Quality, Noise and Pollution

- 9.4.2 Merton is an AQMA. The redevelopment may result in adverse impacts as a result of demolition, construction and an increase in traffic. An Air Quality Impact Assessment will be required as part of any future planning application to ensure suitable mitigation measures have been identified.

The control of dust and emissions during construction and demolition will also need to be considered in the development proposals, reference should be made to Mayor's SPG 2014.

Climate Change and Energy

- 9.4.3 The scale of development will increase the amount of energy consumed and is likely to result in an increase in greenhouse gas emissions and non-renewable sources of energy. Central to the case for regeneration is the need to improve the environmental performance of the dwellings on the estates.
- 9.4.4 All development, will need to comply with the London Plan Climate Change policies and the Core Strategy's [Policies CS14 Design and CS15 Climate Change](#), which should ensure that suitable mitigation is identified and applied. Particular attention should also be given to LP Policy 5.3 Sustainable Design and Construction.
- 9.4.5 Consideration should also be given to the following development management policies, as set out in the Sites and Policies Plan:
- | | |
|--------|---|
| DM D2 | Design Considerations in all developments |
| DM EP1 | Opportunities for decentralised energy networks |
| DM EP3 | Allowable Solutions |
| DM EP4 | Pollutants |
- Further guidance is also provided in the Mayor's Sustainable Design and Construction SPG 2014.
- 9.4.6 Energy strategies will need to clearly demonstrate that development complies with the Mayor's Energy Hierarchy and emission reduction targets. The scale of the development provides the opportunity to assess whether district-heating networks could be implemented in order to reduce carbon emissions, particularly in the long term. The Council will continue to work closely with the GLA and the Heat Network Delivery Unit in order to deliver a site-specific energy strategy appropriate for each development site, in accordance with development plan policies.

Transport

- 9.4.7 Development should seek to make the estates well connected places where walking, cycling and public transport are the modes of choice when planning all journeys, in line with the Core Strategy policies 18-20 and development management policies DM T1-T5.

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

Waste Management

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

Water Resources, Water Quality and Flood plain

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

Open Space and Biodiversity

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

Viability and Deliverability

- 9.4.12 The regeneration of the Eastfields, High Path and Ravensbury Estates is considered as a single project for economic purposes by Clarion and as such the financial deliverability of the regeneration of the three Estates is interlinked. High Path is the value driver and therefore the financial benefits of the regeneration of the High Path Estate are to be used to enable the regeneration of the Eastfields and Ravensbury Estates.

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

9.5 Any uncertainties and risks

- 9.5.1 The Plans, Programmes and Policies as well as the Baseline Data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work that will be undertaken as part of the planning applications for development. Specific attention should be given to the uncertain impacts identified when reviewing proposals.
- 9.5.2 The specific mitigation measures will also need to be provided in more detail at the planning application stage to ensure that any adverse impacts are suitably addressed. Monitoring of the impacts will be addressed through the Local Monitoring Report, produced annually. A detailed phasing and decanting plan will also be required to ensure disruption to residents is minimised as far as possible.
- 9.5.3 A high-level viability assessment of the Estates Local Plan was undertaken by BBP Regeneration in March 2017 to verify the current development assumptions. The report concluded that the Plan is considered to meet the NPPF test that the cumulative impact of the standards and policies should not put implementation of the plan at serious risk. The report acknowledges that planning obligations relating to affordable housing and other mitigation measures will need to be considered on a case-by-case basis; it has not considered the viability of specific proposals for development.
- 9.5.4 The financial modelling work for the regeneration is on-going. The current development assumptions will be subject to review as planning applications are prepared. Further detail is still required on some elements, e.g. the costs of demolition and the Community Infrastructure Levy. Discussions are also on-going regarding the estimates of sales prices, phasing of sales and early discounting, sales rates and rental income, all of which may be affected by post-referendum uncertainty.
- 9.5.5 There are also risks largely outside the Borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

10 Implementation

10.1 What are the next steps?

- 10.1.1 The Sustainability Appraisal was issued with the Submission Version Estates Local Plan to the Secretary of State, for consideration by an independent Planning Inspector at an Examination in Public between 4-6 July. The Inspector has outlined proposed Major Modifications to the ELP, which have been considered within this report. The revised reports will be subject to further consultation for a period of 6 weeks. Should the Inspector consider the revised Plan to be sound, the Council will subsequently adopt the ELP and a Post Adoption Statement on the SA process, summarising the findings of the assessment, will be published.

10.2 How the plan will be implemented

- 10.2.2 The Council will use the ELP when determining planning applications in relation to the Estates. The ELP will be used alongside the London Plan, Core Strategy and Sites and Policies Plan. The ELP sets out at pages 177-179 how the delivery and implementation of the policies will be carried out.

10.3 Proposals for monitoring

- 10.3.1 The National Planning Practice Guidance (NPPG) states that local planning authorities should not need to undertake comprehensive assessment exercises more frequently than every five years although they should be updated regularly, looking at the short-term changes in housing and economic market conditions. Merton will be monitoring this Plan against the same indicators in Merton's Local Plan and the SA Framework and will report and publish by way of the annual Authority Monitoring Report, which is available on Merton's website each year.
- 10.3.2 Assessment of delivery of the Plan will also be monitored to determine if any intervening action needs to be taken to achieve the identified goals within the Plan.

11 Conclusions

- 11.1 This document provides a [Sustainability Appraisal \(SA\)](#) of the London Borough of Merton's [Main Modifications Estates Local Plan \(ELP\)](#). Once adopted, the [ELP](#) will be part of Merton's Local Plan, which collectively will provide the detailed planning and design guidance for the regeneration of the Eastfields, High Path and Ravensbury Estates over the next 10 to 15 years.
- 11.2 [Jam Consult Ltd](#) has been commissioned by the London Borough of Merton to undertake the [SA](#) following a review of the Sustainability Appraisal process and reports that have been prepared in relation to the [Estates Local Plan \(ELP\)](#) between 2014 and 2016. The SA seeks to rectify any flaws in the SA process that have been identified and respond to comments made on the Scoping Report 2014, Issues and Options SA 2014, Draft Estates Local Plan SA Report published in February 2016 and the Submission Draft Estates Local Plan SA Report, November 2016.
- 11.3 This report provides an update to the Submission Version SA Report, March 2017 and considers the proposed main modifications to the ELP and also corrects any minor errors that have been identified.

[Background to the Regeneration of the Estates](#)

- 11.4 Clarion is the majority landowner of the estates, owning about 60% of the three estates following Stock Transfer from the Council in 2010. Clarion will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes. Clarion is one of the largest Housing Associations in the UK.
- 11.5 As a result of initial stock condition surveys and financial planning work, Clarion discovered that significant refurbishment and maintenance work, as well as financial investment, was required to achieve the necessary improvements in standards. This was as a consequence of a history of reactive repairs rather than proactive or comprehensive refurbishment. Clarion therefore began a comprehensive review exercise across all their estates within the Borough to determine whether it might be more beneficial and sustainable to replace homes in the poorest condition with new properties. Consideration was given to the condition of the properties over a 50year period, which was based on the length of Clarion's financial modelling.
- 11.6 All the Clarion Estates in Merton were assessed to determine the impact of upgrading homes to the Decent Homes Merton Standard. This included consideration of:
- Capacity of existing stock to meet current and future housing needs e.g. overcrowding, older people, demand for adapted properties, etc.
 - Condition of the existing stock and historic / projected maintenance issues and costs
 - Community safety and reported crime
 - Indices of deprivation, including super output area level identification of areas in decline.

- 11.7 The above work was augmented by further reviews based on the deliverability of potential regeneration programmes on each of the estates. This review included:
- Scope for increasing the number of homes on site
 - Access and site constraint issues
 - Income generation potential and future sales values and demand
 - Contribution to future housing supply
 - Proximity to public transport and other infrastructure.
- 11.8 These two work streams were combined and clearly identified Eastfields, High Path and Ravensbury as the three estates within Clarion's ownership with the most viable regeneration potential. The regeneration of the estates offers the opportunity for Clarion to explore the potential for creating new, high quality and sustainable affordable housing for the people of Merton. As a result, the lives of the residents on the Estate could be significantly enhanced, by overcoming inequalities faced by those living within the existing poor quality housing. The delivery of wider regeneration benefits to the surrounding area could also be realised.

The Estates Local Plan

- 11.9 The Plan seeks to provide a flexible framework to guide the future regeneration of the estates and surrounding area to be used in determining the detailed planning applications for scheme proposals. The ELP will form part of the Development Plan for the Borough, which contains the planning policies that guide development in Merton. The Plans should be considered as a whole and includes the following documents:
- The Mayor's London Plan 2016
 - Merton's Core Planning Strategy 2011
 - The South London Waste Plan 2012
 - Sites and Policies Plan 2014
 - Policies Map 2014.

The Sustainability Appraisal

- 11.10 The review of the SA process found the assessment of options for each of the estates should be revisited in respect of the representations received on the Draft ELP SA, February 2016. This SA therefore enables greater clarity to be provided on the reasons for the selection and rejection of alternatives. It was also recognised that the results of the assessment could be strengthened, by providing greater links to the supporting evidence and a more detailed commentary to support the results.
- 11.11 In carrying out the SA of the Estates Local Plan, the SA has drawn on the information prepared in the 'Case for Regeneration' reports prepared by Savills on behalf of Clarion and the supporting technical documents prepared by independent consultants that were used to inform the findings.

Selection and Rejection of Options

- 11.12 As a result of the consultation on the options the following options were rejected going forward:
- **Do nothing** - was not considered a realistic alternative as Clarion is legally bound to refurbish the condition of the stock under the provision of the Stock Transfer Agreement with the Council.
 - **Partial Development of Eastfields and High Path Estates** - the option would not offer the best opportunity to deliver a high quality residential development that optimises the use of the land to deliver a high quality residential development.
 - **Full redevelopment of Ravensbury Estate** - Full regeneration of the estate would not generate a significant uplift in residential floorspace, which would mean that the combination of high site assembly costs and high costs of full regeneration would not make the option viable or deliverable.
- 11.13 The SA has therefore assessed the following options:
- Option 1: Refurbishment to Decent Homes (Merton Standard)**
- Option 2: Refurbishment to an Enhanced Standard**
- Option 3: Full Redevelopment (Eastfields and High Path) / Partial Redevelopment (Ravensbury)**
- 11.14 The assessment of the Options has shown for all the estates that whilst Options 1 and 2 would improve the quality of the housing stock, they would not enable the use of the land to be optimised to provide an increase in the quantity of accommodation on the Estates to be realised and meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable housing and overcrowding.
- 11.15 Furthermore, the refurbishment would involve significant costs in the short term to bring the properties up to the appropriate standard, however the benefits would only be of short-term benefit. Significant further investment would be required in the longer term to maintain the properties at a liveable standard.
- 11.16 Option 1: Refurbishment to Decent Homes (Merton Standard) and Option 2: Refurbishment to Enhanced Standard were therefore not considered to be suitable options for the regeneration of the estates.
- 11.17 Option 3 would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need and overcrowding. The regeneration will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills, both in the construction and operation of the development. The redevelopment also provides opportunities for the layout, urban design and landscape of the areas to be improved, including accessibility to the surrounding area and facilities.

- 11.18 It is important to note that the regeneration of the Eastfields, High Path and Ravensbury Estates is considered as a single project for economic purposes by Clarion and as such the financial deliverability of the regeneration of the three Estates is interlinked. High Path is the value driver and therefore the financial benefits of the regeneration of the High Path Estate are to be used to enable the regeneration of the Eastfields and Ravensbury Estates.
- 11.19 The regeneration of the Estates over the 50 year life cycle would deliver the greatest regeneration benefits having regard to Clarion's vision and planning policy requirements, including the housing, socio-economic, place making and environmental benefits identified within this report. Regeneration therefore presents the most sensible and sustainable solution.
- 11.20 Furthermore, Clarion is an affordable housing provider who has funding in place to deliver better quality affordable housing compared to current standards, which is the key driver for the regeneration. Extensive work has been undertaken on the emerging regeneration proposals, to incorporate homes for private occupation into the schemes to enhance the overall viability and this will continue.
- 11.21 Greater clarity will be needed on the viability and deliverability of the proposals, and the phasing and decanting proposals. Proposals will need to be drawn up which minimise the disruption to existing residents as far as possible. Further work will also be needed to examine the specific issues that relate to each estate in order to determine how they can be addressed in the design proposals to achieve sustainable development.

Plan Policies

- 11.22 The majority of the effects of the policies are found to be positive. Where uncertainty is recorded it relates mainly to the impact upon environmental objectives, particularly in relation to the policies on Land use and Environmental Protection for each of the estates. The main reasons for uncertainty arise because of the lack of detail at this stage on the design proposals and the specific mitigation measures that could be used to minimise any adverse impacts. Negative impacts are recorded in relation to climate change, energy and carbon and waste as a consequence of the amount of new development that will occur. Detailed mitigation measures will need to be identified within the design proposals.

Next Steps

- 11.23 The Main Modifications ELP and SA Report will be issued for consultation and any comments received will be taken into consideration. Should the Inspector consider the Plan to be sound the Council will subsequently adopt the ELP and a Post Adoption Statement on the SA process, summarising the findings of the assessment, will be published.