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Dated 21st June 2016

For the attention of Mr Shaun Hamilton, Case Officer

Dear Sir,

Reference: PLANNING APPLICATION : 16/P1968

64-70 Ravensbury Grove, Ravensbury Garages & Adjacent Land Mitcham Surrey CR4 4DL

In regards to the above planning application, I have read through the documentation, plans, sections and artists impressions supplied by Circle Housing to yourselves. I know the proposed area for development extremely well having been a resident in Ravensbury for the past 45 years.

I wish to object strongly to the proposed development in this location.

Setting : Character and views along Ravensbury Grove:

The Ravensbury Estate is a small village-like area positioned on the banks of the River Wandle. It is cradled by the Wandle Valley Conservation Area, comprising of Ravensbury Park and Morden Hall Park. The Ravensbury Estate is unusual in that it sits like a country village, in the midst of this green and leafy area.

Turning off the main road, onto Ravensbury Grove, you are greeted by mature trees, and buildings set back so as to afford large green open spaces. The spatial relationship between the flats on the left-hand side and the houses on the right-hand side is generous and open. The buildings are in balance, there is a harmony in the existing design. The impact of the 4 storey height of Ravensbury Court is reduced by the set-back and further improved by the large trees. Trees have been employed in order to break up the facade and engender a feeling of openness. This feeling is continued down Ravensbury Grove (southwards), culminating in the park at the end of the road. The existing built environment engenders a positive relationship with the surroundings: Ravensbury Park and Morden Hall Park. This is achieved through a gradual reduction in building height as it nears Ravensbury Park. By not imposing the built environment on either of these beautiful nature reserves, the existing Ravensbury Estate

attempts to magnify the form and function of the parks. These two green emeralds in the crown of the London Borough of Merton deserve respect through well-proportioned development and thankfully our predecessors saw fit to construct homes that struck this balance between the need for housing and a desire to relate to their immediate environment.



Aerial View of Ravensbury Estate and Ravensbury Park, seen from the North



View South towards Ravensbury Park from Junction Ravensbury Grove/Hatfeild Close



View South from Ravensbury Court on Ravensbury Grove



Ravensbury Grove looking South



View from Hengelo Gardens towards Ravensbury Park (L) & Flats on Ravensbury Grove looking South illustrating set-back (R)

Relationship with the Wandle Valley

The market garden design of Ravensbury makes it an integral part of the Wandle Valley. In future we would expect parts of it to be incorporated into the extended boundary of the conservation area by virtue of the large areas of green space and scope for enhanced planting: these could support a broader range of species and effect a continuation of habitat. The scale and low density of the existing Ravensbury Estate also prove it to be worthy of being part of the Wandle Valley through its healthy proportioned relationship with its immediate surroundings. In truth, we are quite surprised this hasn't been recognised to date. There is a willingness on the part of many residents but it's important to get the housing association & council onboard also.



Views along Ravensbury Grove & Hengelo Gardens (Above)



Views within derelict garages sight indicating relationship with trees(Above) plus relationship with park, Below



View from Conservation Area towards locally listed wall and garages area beyond



View from Ravensbury Park Conservation Area towards locally listed wall and garages area beyond - Lamppost indicates approximate two storey height - houses will be roughly double this to top of roof



Panorama of Ravensbury Grove Seen from 64-70 in June 2016



Panorama of Ravensbury Grove Seen from 64-70 in June 2016



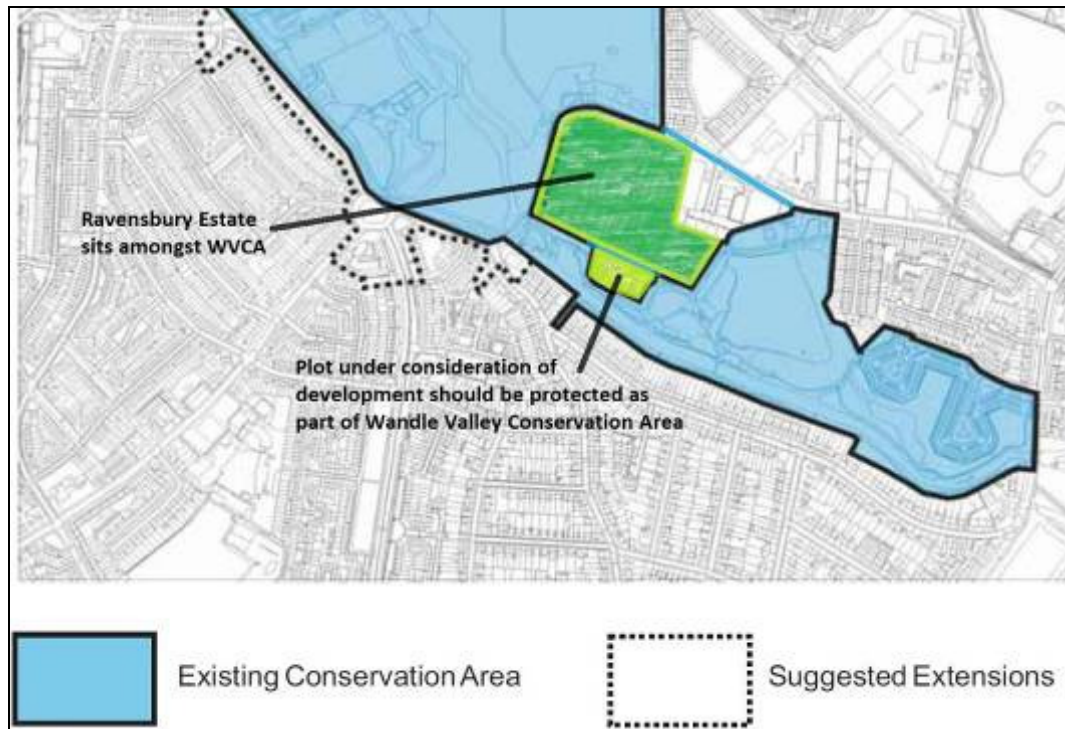
View from Ravensbury Park toward existing 64-70 Ravensbury Grove



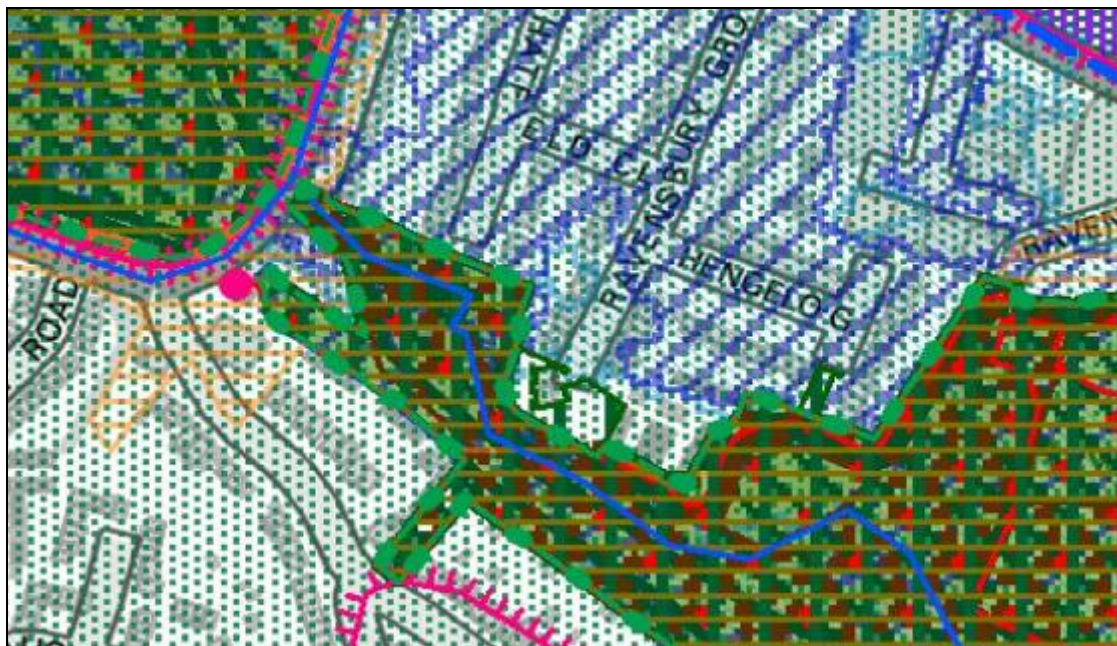
View along Ravensbury Garages footpath - Lamppost indicates two storey height (Mar 2015)

The Wandle Valley Conservation Area (WVCA):

As the Wandle passes by the Ravensbury Estate, it meanders around the current built environment. It is at this point that the Wandle Valley Conservation Area (WCVA) and Ravensbury Park Local Nature Reserve (LNR) are therefore essentially compromised in terms of overall width. Indeed, the southern end of Ravensbury Grove denotes one of the Wandle Valley's narrowest points in the local area.



Wandle Valley Conservation Area Map



Merton's Sites and Policies Map

Merton's Sites and Policies Plan & Map denotes that much of the area chosen for redevelopment is Open Space - Policies CS13, DM01. The rest of the area is in the Wandle Valley Regional Park 400m Buffer (Policy CS13 para 21.13). The whole site is adjacent to the Wandle Valley Regional Park (Policies CS5, CS13, DM01) and adjacent to Sites of Importance for Nature Conservation (Policies CS13, DM02) and Local Nature Reserves (Policies CS13, DM02).

DM O1 Open space

Link to Core Planning Strategy Policies CS 13 Open Space, Nature Conservation, Leisure and Culture; CS 5 Wandle Valley Regional Park - **Policy aim** - To protect and enhance open space and to improve access to open space.

We consider that this land is not truly surplus to requirements. These garages were designed to serve the residents of Ravensbury. Car parking is in great need in our area. Some of this land should be put back into use and some of it turned into a wildlife area.

This policy also states that the design should not harm the character, appearance or function of the open space. These designs definitely do infringe on these policies. Ravensbury Park will be affected unduly by the height of these buildings. Building on the open space in the area of block B will also harm the character of Ravensbury Park, and that of the Ravensbury Estate. It is for this reason also that these proposals do not actually improve the public access between existing public areas and open spaces. The current footpath is much more direct than the alignment proposed by the development, and the current footpath is far more pleasant than that suggested by the developer.

The character and function of leisure walks and green chains: in this development, these walks are harmed and are not enhanced. Block paving between two four storey blocks of flats in place of green open space is not an enhancement. It does not suit the character of Ravensbury. It is not sufficiently green nor open nor pleasant.

We also feel that part (e) is applicable in this instance, due to the fact that this development will be very conspicuous from MOL and designated open space, and that the visual amenities will indeed be harmed by the towering blocks and their siting so close to the River Wandle. This solution is not appropriate for Ravensbury at all.

SA/SEA implications:

In 5.1 of the Merton Site & Policies Plan, the Sustainability Appraisal and a Strategic Environmental Assessment (SA/SEA) states:

The policy meets a number of sustainability objectives relating to green issues particularly well, including health and wellbeing and climate change. The protection of the open spaces will ensure that any development proposal does not have a negative impact on the local environment and the policy ensures that any appropriate development is concentrated on the most appropriate brownfield land. This policy approach will enhance the quality of life through the provision of open spaces for both active and passive leisure activities. Open spaces and their vegetation can also assist surface water runoff and help to mitigate flood risk to properties and people.

This development paves over green open space and directs the surface water directly into the River Wandle. This is not an appropriate use of our open space. It would be far better to retain the green space and even use it as a soakaway for a percentage of the development. The use of swale areas through the use of grassed area like this area, should be employed also.

It is obvious that this development does indeed have a negative impact on the local environment through its massing and height.



Drainage drawing showing Levels proposed by the developers

Paragraph 5.10. states:

The visual amenity provided by designated open spaces has much public value and therefore development in proximity to and likely to be conspicuous from designated open spaces must not harm these amenities.

However it is obvious from reading the plans, elevations and sections, that this area does not have as high a public value as currently exists. The proposals do indeed harm the visual amenities afforded by the current open space. The utility of the green space at the southern end of Ravensbury Grove is multiple. Walkers, residents, wildlife all benefit from this space. Everyone and everything enjoys the green space. It would not be an improvement to lose it, and the setting and the character of this area as well. Block B simply should not be built at all and Block A should not be so tall. Neither of these blocks and the associated landscaping improve on what is currently in place. The proposals do not "conserve and enhance the natural environment" as per paragraph 5.14.

DM O2 Nature conservation, trees, hedges and landscape features

*Link to Core Planning Strategy Policy CS 13 Open Space, Nature Conservation, Leisure and Culture - **Policy aim** To protect and enhance biodiversity, particularly on sites of recognised nature conservation interest. To protect trees, hedges and other landscape features of amenity value and to secure suitable replacements in instances where their loss is justified.*

Policy (a): "...proposals in and adjacent to these corridors will be expected to enhance their nature conservation value."

Due to the height, massing and proximity of the proposed development, we believe that this policy is particularly appropriate.

DM D1

Policy (d): The maintenance and enhancement of identified important local views, panoramas and prospects and their settings and where appropriate, create new views.

As discussed in this response, the removal of a key view by this development into Ravensbury Park is particularly worrying and should not be permitted.

Policy (i): Proposals for the conversion of front gardens for vehicle parking should not be detrimental to the character of the street or highway safety or undermine biodiversity, prevent sustainable drainage or reduce highway safety. (Further references on this are included in Merton's borough character study. Also Policy DM T3 refers to parking bay dimensions).

Much has been made by Circle Housing during discussions with local residents regarding paving the front gardens over in order to provide parking for those residents. We are concerned that this is in contravention of the above policy and that these works could, if carried out incorrectly, be particularly onerous on the character of Ravensbury. Therefore, we expect Merton Council to effect appropriate measures to ensure the retention of the extensive hedges that characterise the Ravensbury landscape and enhance the biodiversity that is key to our area within the Wandle Valley. Sustainable drainage is of particular concern in an area of high risk for flooding. We would expect that Circle's developers submit plans denoting extents of parking proposed in each garden as opposed to being allowed to pave entire gardens, causing excessive runoff. It is important to limit the paving of the gardens for the reasons expected of a flood area of high risk.

In advance of this application, Circle Housing has quite recently allowed some of their properties around Ravensbury to install solid concrete front gardens, with no capacity for absorbing runoff. No drainage, and no soakaways. We would expect that as part of these proposals, Circle Housing rectify these garden conversions in order to avoid additional impact on the flood plain through not preventing their tenants taking matters into their own hands.

Front gardens should retain hedges and install adequate planting to prevent depletion of habitat and expand biodiversity to the benefit of the area being so close to the local nature reserve and the Wandle Valley Conservation Area. This will enhance the green chain effect that is so important for an area such as Ravensbury.

Safety & Security (6.7)

Well-designed places feel safe because they have built-in natural surveillance through the design of buildings and spaces, as well as having complementary mixes of uses and activities. Places that work well and look good also help engender a sense of belonging and local pride, which in itself encourages community participation and helps keep a place safe. Excessive and overt manifestations of security features often have the opposite effect.

Strangely enough, the southern end of Ravensbury Grove fulfils this policy to the letter. This is why we are so concerned about the general push for redevelopment at the expense of the character of our area.

Gated development (6.8)

An example of this is gated development which may address security concerns, however they restrict public access and therefore choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion. It is therefore likely that most types of gated developments will be contrary to this policy, particularly parts (a), (b) and (e) and are therefore discouraged by the council. The council's proposed Design SPD will contain further guidance on this matter.

We have concerns that the narrow access road down the side of the block B flats, effectively suggests a gated development, away from the rest of Ravensbury Estate, which is currently a very cohesive unit that residents and passersby enjoy.



This is another reason why Block B should not be built. Not only it is situated on valuable green space, it serves to further segregate Ravensbury Grove from the interior of the development, suggesting a private space. There is very restricted permeability in this new development.

In the garages area, there is a gate that leads onto the footpath. In this development, the gate has been removed and access is no longer possible through the site in question. The gate is indicated on the plan below:



Sustainability:

We do NOT believe that a 4 storey block of flats on actual Open Space is sustainable in any form. Arguments can be made that attempt to outweigh economic over environmental , but we believe that for this site this is impossible. The site is simply too sensitive for wildlife, for views, for the future of our environment. This will set a precedent for more excessive development adjacent to some of our most sensitive sites in Merton.

Because of The NPPF, the London Plan and Merton's own Local Plan states that sustainable development is about change for the better. This development is too crowded for such a sensitive site and the overall design should be rejected.

Economically, the development affects the park is therefore detrimental to our green economy - the extent to which our park remains attractive to those drawn to its beauty. Passersby will no choice about their views out of the park once this is completed. If the views, as we and many residents believe, are harmed then there will be no going back if this is given the go ahead.

Socially, we already have a very high quality built environment. Any building that have not fulfilled their function have only done so through poor repairs and maintenance on the run up to the push for regeneration.

Environmentally, our existing wildlife seem to be thriving. We are always keen to give them a helping hand, but this development makes little contribution to an improvement in an

environmental sense due to the overdevelopment of the site. If the proposals were that much more restrained then it is possible that Ravensbury Park could benefit, but the massing and overall impact because of it suggests to us that this development as it stands will be a backwards step.

It is for these reasons that we believe this development is indeed unsustainable.

In the proposals specified in 16/P1968, the open space is relegated to patches distributed around the development as opposed to relatively wide open space that currently sits adjacent to the conservation area. The current land serves to expand the park, creating an annex for wildlife and, very importantly, for residents and passersby. Enter into this space and you already feel as if you are in the park. Exit the park and this space serves to extend the sensation of parkland, softening the progress into the built environment that is the current Ravensbury Estate.

Losing a cohesive green space in this area would therefore run against a number of the stated sustainability benefits of health, locale, & neighbourhood character. Redeploying the green space in a piecemeal fashion around the proposed development would not maintain its current beneficial role in terms of:

1. Location immediately adjacent to the Wandle Valley Regional Park,
2. Views into and out of Ravensbury Park,
3. The role in terms of character on behalf of Ravensbury Estate,
4. Enhancing the transitional mood of the area (a green transition from park to estate).

This open and enjoyable green space should be protected from development for these reasons with the hope in future of being included in the Wandle Valley Regional Park. Creative thought on the behalf of the species management in this area will make a positive contribution to the Wandle Valley. The area could be utilised as a swale zone for any future development within the garages, encompassing possible pond life, something that seems to be deficient in an area so close to the river. This in turn would reduce run-off into the already high risk flood zone of Ravensbury Grove & Hengelo Gardens. Hard paving of this area is to our mind, a ludicrous idea due to the multiple benefits to both wildlife and the community at large through retention of this valuable open space. Having run-off fed directly into the Wandle also seems contrary to the sustainable objectives mooted.

Destroying this area in order to place a 4 storey block of flats on it is **not sustainable**. Making the argument that the benefits of greater housing provision outweigh the negatives does not hold water either as the significant impact on the neighbourhood and on the immediately adjacent conservation area indicate otherwise.

Overdevelopment is a major risk in this area due to its sensitive relationship with both Ravensbury Park, the Ravensbury Estate and the Wandle Valley. If this is indeed phase 1 of the regen, then it should be assumed that there is considerable scope for a proportion of the 21 homes to be redeployed within the proposed £1bn Merton regen. Pressure should be resisted to forcibly develop this sensitive location scope of the entirety of the Merton Regen documentation published extensively.

Building substantially only on the plot currently occupied by the maisonettes (64-70 Ravensbury Grove) and that of the derelict garages would be a better scheme, but even this should be reduced to two storeys. Three storeys could be acceptable in the current building

plot if one of the storeys was incorporated into the roof. This approach could attempt to reduce the sizable impact on the local environment.

Walking South down Ravensbury Grove

As one travels south along Ravensbury Grove towards the junction with Hatfeild Close, the trees in Ravensbury Park form a distinctive back drop to the low rise, two storey houses with pitched roofs. This scale of building is sympathetic with the park due to its proportions. The existing homes do not encroach on the park (or even block the view of it) and thereby magnify the park's value to passers-by and residents alike. From the junction of Ravensbury Grove and Hatfeild Close, Block B, if built, will encroach very strongly on the surrounding trees that form part and parcel of the character of Ravensbury as a whole. To consider interfering with this sense of proportion and harming this relationship by means of a 4 storey block of flats (Block B) beggars belief.

It is from this point also that the other four storey block of flats (Block A) will be seen emerging above the existing tiled roofs and further blocking the view of the park. Block A stands forward of the main building line of the existing houses and the height will therefore be that much more noticeable from along Ravensbury Grove. The problem with Block A is that it is too high in relation to the surrounding buildings and especially too high in relation to the surrounding trees (it also towers over the River Wandle). If it were two storeys in height, or possibly three storeys if the uppermost level were incorporated into the roof space, the negative effects on the character of the neighbourhood would be that much less.



Approaching the Southern End of Ravensbury Grove

As one nears the end of Ravensbury Grove (practically in line with 60 Ravensbury Grove), to your left the view of Ravensbury Park begins to extend considerably, by roughly 100m. This is one of the best views of the park when seen from within the Ravensbury Estate, allowing the visitor to see for a relatively long way and admire the large trees. This area also excels in terms of amenity due to the fact that it is a public area and not a private back garden. This area, with its green space, quality views into the park and defensible public space is a highly valued amenity for the residents of Ravensbury. The small cherry tree and planter may be considered by the developer's arboricultural consultant as having low value, but for residents this magnifies the value of the area. Indeed the planter was bought and paid for by the Ravensbury Residents Association around 20 years ago in order to positively transform the grass and lend it greater value than a mere lawn. Before that, this area was a quiet wooded glade, with mature trees interspersed with lawn - a beautiful area serving its function as both park and open space of great value to the residents. The storm of 1989 brought down a number of these trees, which were not replanted.

The lack of strong views into the park is commented on in the developing Ravensbury Local Plan. This public view should be retained for future generations to enjoy. Any passerby or resident, old or new, would be able to appreciate this area from a natural perspective without actually needing to walk into the park proper.



(Above & Below) Standing at the southern end of Ravensbury Grove, one can see all the way down the side of the park, appreciating the size of the trees and enjoying the sensation of encountering the wooded area, complete with teeming bird life both above your head (herons, kestrels and the like)



View across garages seen in March 2016 - note relationship with immediate environment

If one were to permit the construction of Block B in this area, at best, one would be compromising both this view and the extension of park environment into Ravensbury, at worst one would be destroying the sense of the neighbourhood's location forever. There will be no going back. A building of four storeys in the location proposed for Block B will severely harm the neighbourhood. In fact, any kind of building on this grassed area would be a backwards step. It should be retained for the benefit of the natural environment, the future Merton residents, visitors from outside the area and for the obvious benefits in terms of sustainability.

Boundary between Ravensbury Estate & Ravensbury Park

The proposed development should not be given the go ahead in its current form due to the plans for the site representing overdevelopment in this area in the most sensitive area in the whole of Ravensbury. The southern end of Ravensbury Grove forms the boundary with Ravensbury Park. In this area, the park and the estate are synonymous with each other. Any buildings over two storeys in height will block a large amount of the tree line and affect the overall character of the neighbourhood. To build in this area requires sensitivity & respect in terms of damage to potential outlook for not only to the existing built environment of Ravensbury Grove, Hengelo Gardens & beyond, but also to Ravensbury Park & the conservation area of Wandle Valley. The two go hand-in-hand.



Proposed Block B: This is the most sensitive area of Ravensbury for both the park and the estate-cum-village.

The garages site is 1m higher than in Hengelo Gardens, and therefore any development in this area has consequences that are that much more visible for both the park and for the development.

At the entrance to the garages, the stated level on page 22 of the Flood Risk Assessment (see planning application documentation) is 18.19m AOD. In front of No.60 Ravensbury Grove,

the stated level is 17.61m AOD at the kerb. In front of the houses 1-10 Hengelo Gardens, the stated levels range from 17.08m to 17.16m AOD. This is why from ground level within the garages site, one can see almost directly into the bedrooms of residents homes on Hengelo Gardens:

1. Floor heights in Hengelo Gardens houses:
 $17.11\text{m AOD Ground Level} + 0.3\text{m to Ground FFL} + 2.5\text{m storey height} + 1.125\text{m to first floor bedroom window level} = 19.91\text{m AOD} = \text{First Floor Level}$
2. $18.25\text{mAOD ground level} + 1.7\text{m (assumed eye level)} = 19.95\text{m AOD}.$

From items 1 & 2 above it can be seen that a person standing in front of the Mews Houses will be able to see easily & directly into the bedrooms of the Hengelo Houses. This would constitute unreasonable overlooking. The layout of the houses could be rearranged and the boundary should be screened to prevent this.



View from within the currently derelict garages site, looking towards Hengelo Gardens with the roof to the 4 storey section of Ravensbury Court visible beyond. Height difference between the derelict garages area & the houses on Hengelo Gardens beyond can be appreciated here.

If this application is passed then we would expect that considerable boundary screening be incorporated in order to retain pre-existing levels of privacy and remedy to some degree the loss of amenity.

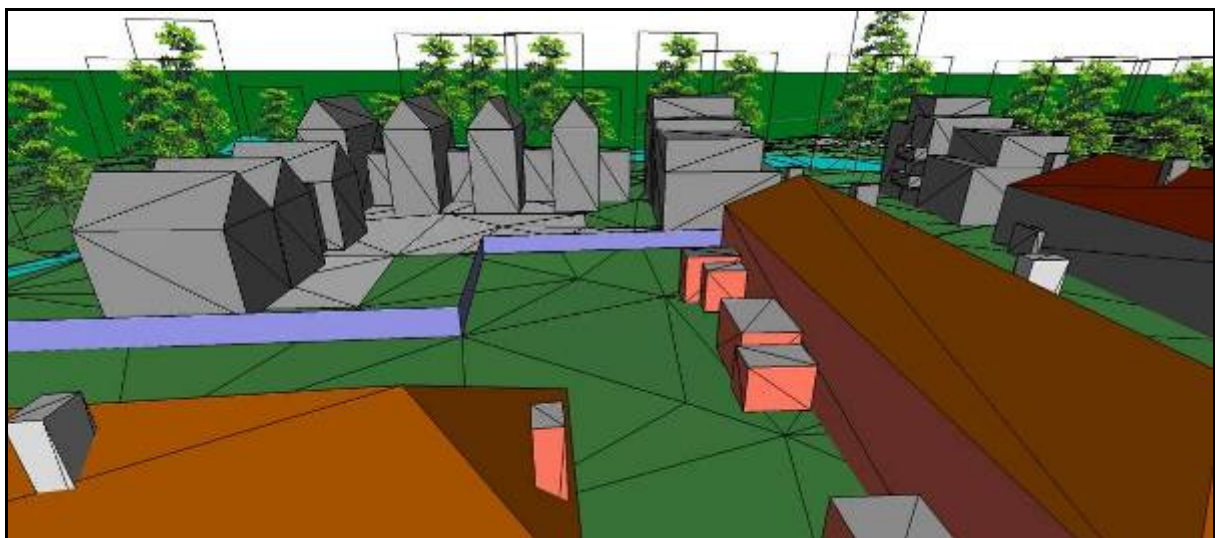
The images below demonstrate the impact of this development and loss of outlook for the homes along 1-10 Hengelo Gardens. The riverside houses block out much of the trees, whilst the mews houses encroach on the garden amenity that the residents currently enjoy.



Existing view from 3 Hengelo Gardens towards derelict garages and Ravensbury Park



View from 3 Hengelo Gardens with new development superimposed - existing trees within development will be removed according to arboricultural plan supplied by developer.



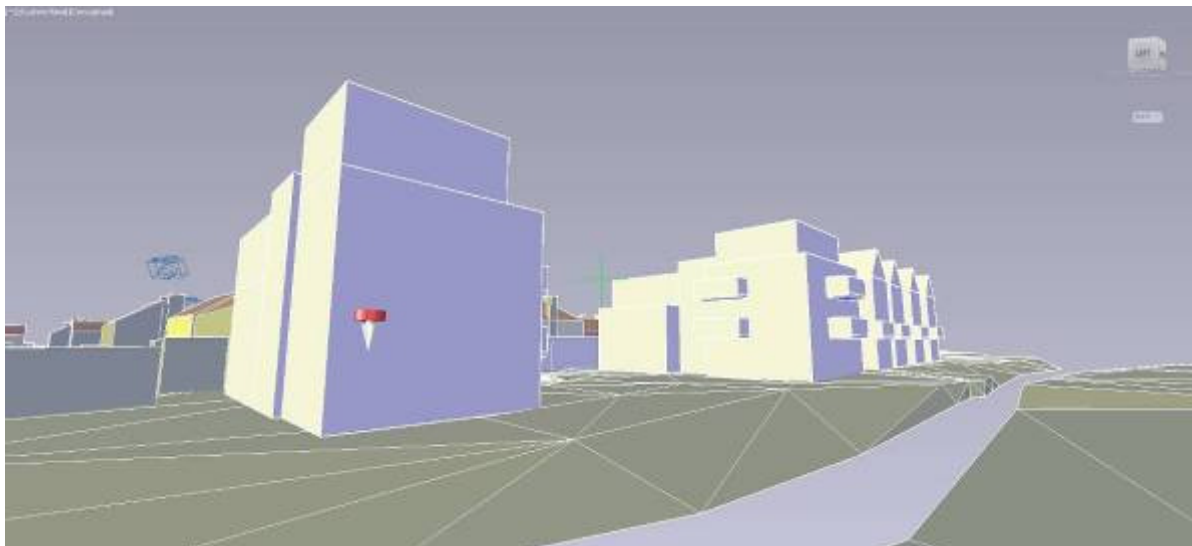
3d view of the relationship between the proposed blocks & Hengelo Gardens and Ravensbury Grove

Views from within Ravensbury Park

The proximity of Block A to the River Wandle and therefore the conservation area is of much concern. From within the park, one can view the rear of the existing homes backing onto the Wandle, namely 56-62 Ravensbury Grove and 64-70 Ravensbury Grove. The current block of 64-70 is angled in order to allow for a back garden, however this location also allows for a better spatial relationship with the conservation area that it backs onto.

The proposed location of Block A will be in far greater proximity to the small channel of the River Wandle and at 4 storeys will tower over it. Both banks of this small channel represent the Wandle Valley Conservation Area. We believe that the design of the new block is far too close to the channel and a location should be found that will give the River Wandle sufficient room to "breathe". In all honesty, the ideal location of a two storey version of Block A is the current location as it provides space for both the tenants and the river environment.

With reference to the Wandle Valley Conservation Area Character Assessment (2007), sub area 5, part 2 contains Policy WV.P3: Development adjacent to the conservation area, and states that development proposals will be expected to "preserve or enhance its setting and not detract from views into or out of the area". We feel that this development will indeed detract from views both into and out of the area.



3d representation of how the development massing and height will influence its surroundings



3d view of the relationship between the proposed blocks and the River Wandle

The massing and overbearing nature of the Block A proposal threatens to relegate this important tributary of the River Wandle into a moribund channel, suitable only for flood relief as opposed to its current role, serving kingfishers, dragonflies and also mammals such as hedgehogs in generally undisturbed river bank areas with little access for extensive pedestrian traffic.

The trees are also very important sites for nesting birds and even bats. To consider further compromising their status for the local flora and fauna should be beyond reproach.

Please note that consideration should also be given towards the possibility of further tree loss if the regen proper goes ahead. Currently, it seems that Circle Housing have proposed little by way of proper habitat replacement in terms of numbers of trees and areas suitable for habitat. Instead, this development seems to serve sterile landscaping and the occasional passing bee. We have an extensive invertebrate population in terms of spiders, stag beetles and other species. This development is removing a large area of potentially ideal habitat.

To our understanding, this development appears wholly unsustainable due to its push for overdevelopment immediately adjacent to the Wandle Valley Conservation Area.

On page 40 of the WVCA character assessment, the Special Guidance states that views should be opened up into the park and entrances enhanced. In our view, this development serves neither of those functions and instead does quite the opposite through the loss of the green open space and the closing in of the park by the 4 storey blocks and the 3 storey houses with tiled roofs that are practically equal in height.

The WCVA guidance continues: " Should the prospect of major or significant development in close proximity to this part of the conservation area become a possibility, a development brief/framework should be prepared for the site or area concerned to secure an appropriate form of development that maintains and enhances the character and setting of the conservation area including buildings and spaces, particularly the parks along the Wandle and entrances to them, and preserves any archaeological remains. Key requirements will include:

1. *Buildings of a form and scale that reinforces the relationship between built development and open spaces.* [Due to the development's scale, it does not serve to reinforce this relationship, but compromises it and has a high potential to irreparably damage it too].
2. Buildings designed of a high quality and which integrate with the surrounding pedestrian network, and which provide overlooking/ surveillance of public rights of way and spaces.
3. Use of good quality materials that reflect and complement but not necessarily copy the palette of historic materials that survive within the area.
4. Create links between the development and the Morden Hall and Ravensbury Parks. [This development does not sufficiently benefit the existing links due to the demolition of the green space that is of considerable benefit as described elsewhere in this response].
5. Where possible maximise opportunities to improve the entrances , particularly to Ravensbury Park. [It is not an improvement to install paving where there was once grass and plants that can serve the wildlife and general environment that much better.

In our opinion, this is a very significant development due to its proximity to Ravensbury Park and the potential for damaging both the park's character and the character of the Ravensbury Estate.

We feel that this development has failed in regards to creating a sustainable link between Morden Hall and Ravensbury Park through the removal of the green space. It has also compromised the park entrance through the same.

The developing Ravensbury Local Plan describes how Ravensbury Court utilises the 4 storey height to block out the view of the industrial estates beyond. It seem ludicrous therefore to use homes of the same height against the park, effectively blocking out the tree line for many residents of Ravensbury and damaging the character and neighbourhood even for passersby.

This consultation has faced stiff opposition from Ravensbury Residents throughout its journey through the consultation stages. It is incorrect to represent the palpable anger of residents by suggesting it has been drawn up with their consent when in fact it is quite the opposite.

Key stakeholders were indeed consulted although Ravensbury Residents Association noted the breadth of opposition to this scheme from the outset. An opposition that did not wane throughout the process. Residents were angry and continue to be angry at how this consultation was foisted on an community that is happy with their homes, assuming repairs are carried out by a competent team.



View of Ravensbury Grove from Ravensbury Court, showing two storey heights. Four storeys will represent overdevelopment and will tower over both the park and the existing homes. This will represent an unsustainable form of development in consideration of the conservation status of Ravensbury Park & the Wandle Valley.

Site Levels:

Much of the site under consideration is a high part of Ravensbury, rising up 1m above the levels within the estate. The area is key to the character of both Ravensbury Estate & Ravensbury Park due to the enveloping tree line. Building on this site needs special consideration in order to avoid unpleasant impacts on both the estate and the park.

For this reason we would have thought that the best proposals should be low storey, ie 2 storeys with flat "green" roofs - ie planted roofs that will minimise the impact of the newly built environment and serve the flora and fauna of our park at the same time. Building over this height compromises the park's internal environment and does little to respect the loss of outlook incurred upon the existing residents of Hengelo Gardens and Ravensbury Grove.

The Developing Ravensbury Local Plan:

The Ravensbury Draft Estates Local Plan has just completed its second stage in March 2016 as such we expect that it should be considered a material planning consideration. This has been developed in consultation with the local community and Merton Council and will go through the final stage 3 soon.

However, on page 166, Policy EP R8 Building Heights of the developing Local Plan, the area of the Ravensbury Garages site and the land at the southern end of Ravensbury Grove was left blank. We found this very strange and consider that by trying to gloss over the future plans for this area, against the spirit of developing a Local Plan for the Ravensbury Neighbourhood. This site is not part of the call for sites plan either, so we believe it goes against the development plan for Merton also.

Flooding, The Sequential Test & Exception Test

This application represents overdevelopment in an isolated area surrounded by an that is at high risk of flooding: zone 3a. We do not think it appropriate to put so many people on an island in this area when there is an already high reliance on emergency services if a flood does occur. With this in mind, we consider the scale of the development a cause for concern. In consideration of the flood risk assessment making mention of the larger scope of the regen, we consider it even more ridiculous to promote additional homes in this area due to its isolated nature. The density should be much lower here.

In section 3, page 5 of The Proposal, Flood Risk Assessment Par 02, Savills make mention of defective Orlit Housing. According to reports by Circle Housing's own structural engineers, submitted to Merton Council as part of the Case for Regeneration in October 2015, the Orlit Houses in question are not actually defective. Circle have mismanaged their repairs and therefore as per their own engineers recommendations, threaten the life span of these homes through neglecting repairs such as gutter replacement as well as facade repair.

On Page 11, para. 6.7, we note that the Inspector stated that appropriate development of such [floodplain] sites is not ruled out. This development is not appropriate due to the multiple reasons stated in this report. for Savills to seek to justify this over development surrounded by flood plains and rivers shows a degree of desperation.

Savills have used the lack of a response in determining the availability of sites and we would question their methodology, particularly in light of the extensive development destined for

Morden Town Centre, the multitude of industrial estates in the area that are awaiting a change in planning in order to sell the land off for housing. We would argue that it is in their interests not to find another site available due to their need to serve their client, Circle Housing. Independent verification would be most appropriate in this instance. We would argue that Savills assertion that there are no other sites, in comparison to Ravensbury in a flood risk zone 3a, holds little water until an independent body supplies their assessments. As such the Sequential Test prepared by Savills should not be solely relied on.

Other notes:

With regards to Design, we would like to note that balcony design in the existing built environment of Ravensbury are actually incorporated into the main facade and do not project outwards. This maintains the lines of the facades. We would have expected that this design would be incorporated in a development that abuts a conservation area so as to reduce the overall impact on the surroundings. This design would also maintain the design ethos already in existence and make any new development more homogenous. We fail to understand why this has not been incorporated.

Conclusion:

We request that this development and the associated planning application are refused on the basis of the arguments presented.

Thank you for giving us the opportunity to respond to this application for planning permission. Please also consider our request to attend and speak at the actual planning meeting for this application as soon as a date is fixed.

Yours faithfully,

Christopher Holt,

Chair, Ravensbury Residents Association

Appendix 1 : Photographs of Ravensbury Grove and associated areas.



Southern end of Ravensbury Grove, abutting the park, seen from Ravensbury Court



64-70 Ravensbury Grove showing relationship with tree line of Ravensbury Park



64-70 Ravensbury Grove showing relationship with tree line of Ravensbury Park



Existing Street scene approaching southern end of Ravensbury Grove



View of Ravensbury Park seen from end of Ravensbury Grove.



Treeline seen from end of Ravensbury Grove



View across existing landscaping towards garages (March 2016)



Ravensbury Grove: Planted and landscaped area seen in May 2016 (above & below)





Ravensbury Grove: Planted and landscaped area seen in May 2016



Ravensbury Grove: Planted and landscaped area in May 2016





View from Ravensbury Court towards Hengelo Gardens with garages site beyond, showing extensive vegetation and leafy outlook





View from Hengelo Garden to rear of Ravensbury Grove showing outlook



View from Hengelo Gardens & Ravensbury Court towards garages area.



View looking south down Ravensbury Grove towards the park



View from 64-70 Ravensbury Grove in June 2016 (above and below)





View of grassed amenity area and character of southern end of Ravensbury Grove



3d artist's impression of flats Block B in Ravensbury Grove

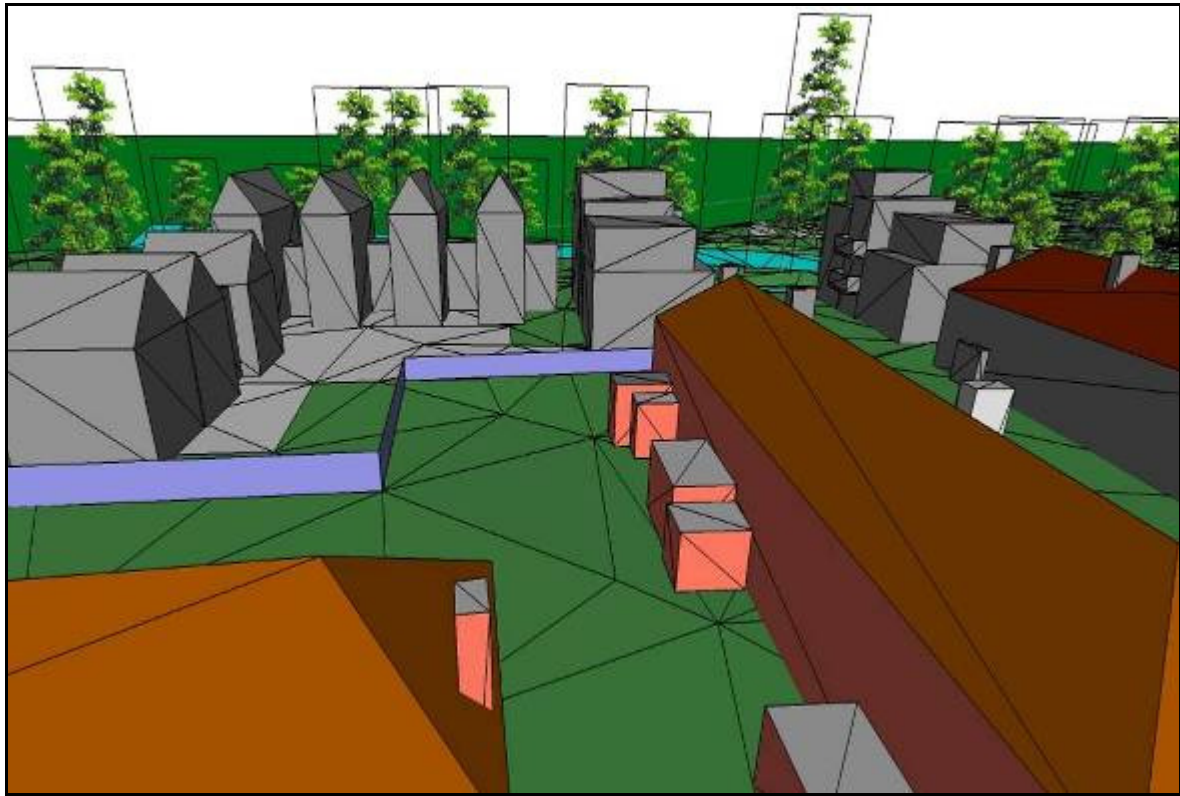


View from rear of Hengelo Gardens towards garages area

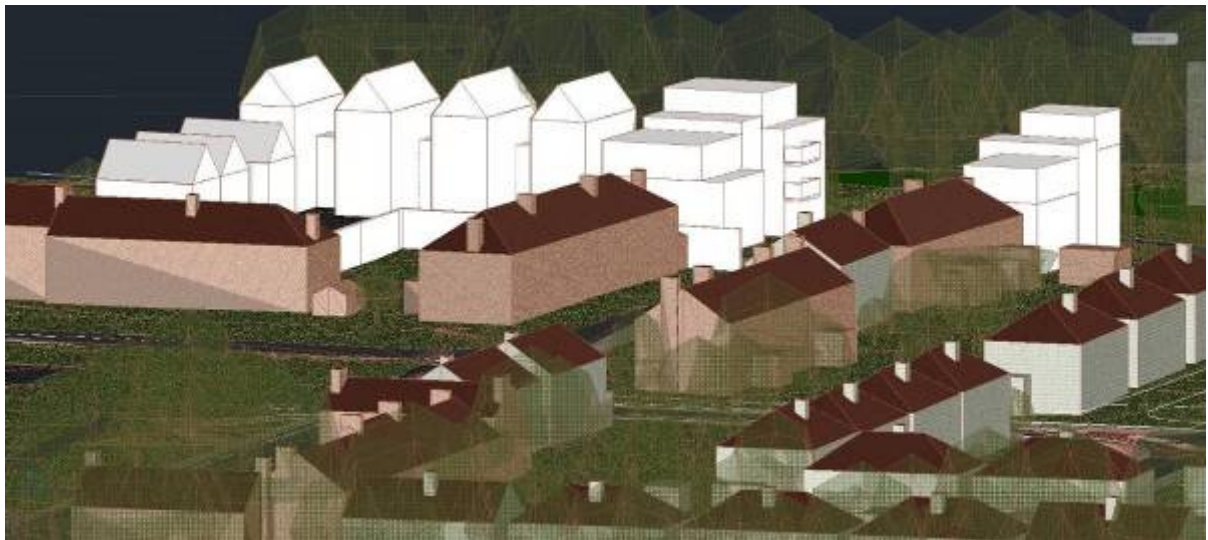


Artist's impression of Proposed housing on derelict garages site. (above and below)

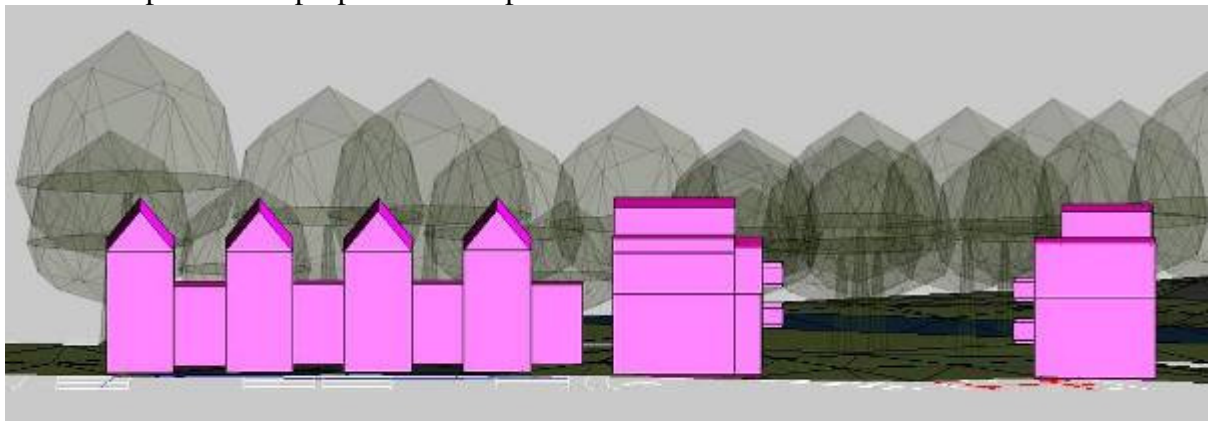


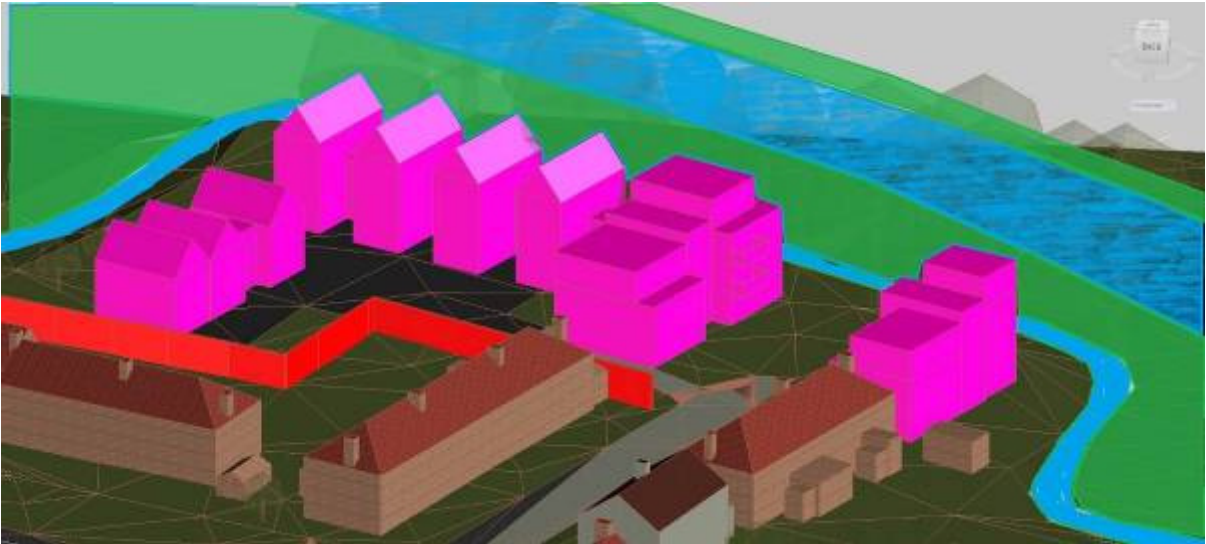


Artist's impression of Proposed housing on derelict garages site.

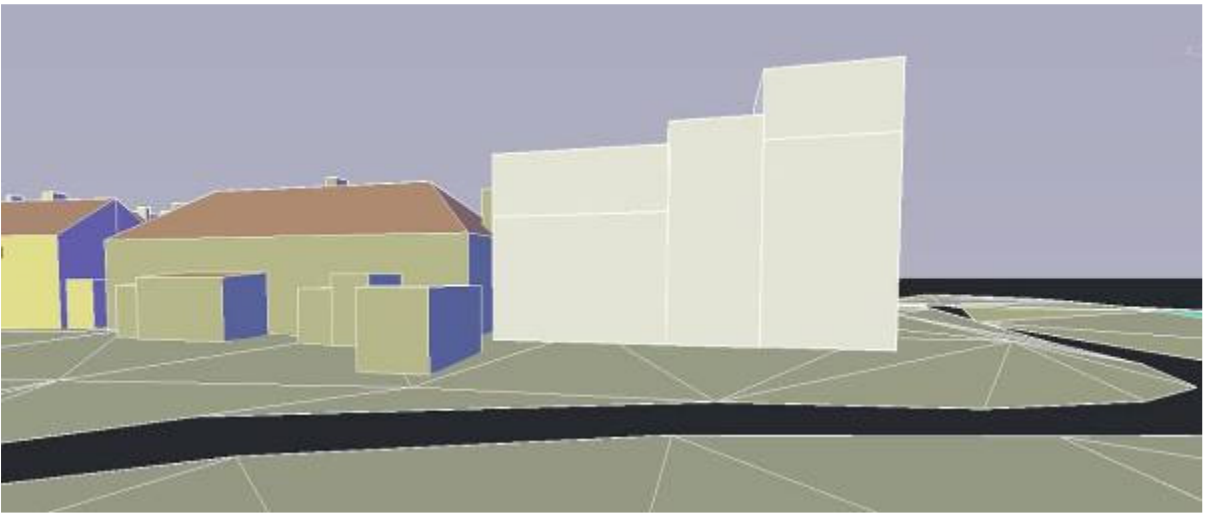


Artist's impression of proposed development site.





Artist's impression of proposed development site.



Artist's impression of relationship between existing buildings and River Wandle



Extent of vegetation within derelict garages site.



Derelict garages site indicating existing scale



Derelict garages site showing extent of park now within boundary.



Appendix 2 : Aerial photographs



View from the East with Ravensbury Park on left hand side (Above)



View from the North, with Ravensbury Park at top of picture (Above)



View showing proximity to Ravensbury Park



View showing boundary with Hengelo Gardens



View showing southern end of Ravensbury Grove



View showing southern end of Ravensbury Grove

Appendix 3: Shadow maps & 3d model simulations

January:



1st January @ 1200hrs



1st Jan @ 1500hrs

April:



1st April @ 0900hrs



1st April @ 1100hrs

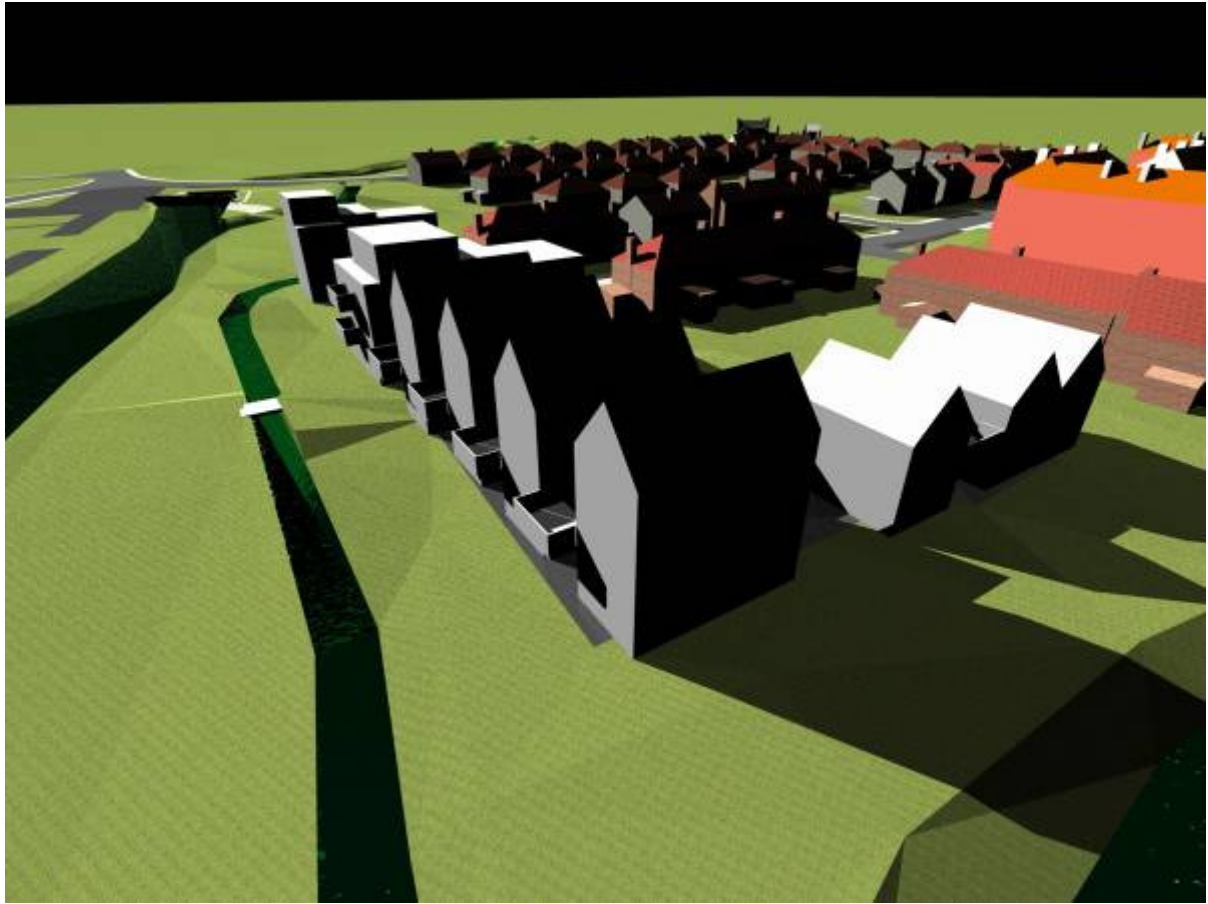
June:



1st June @ 0700 hrs



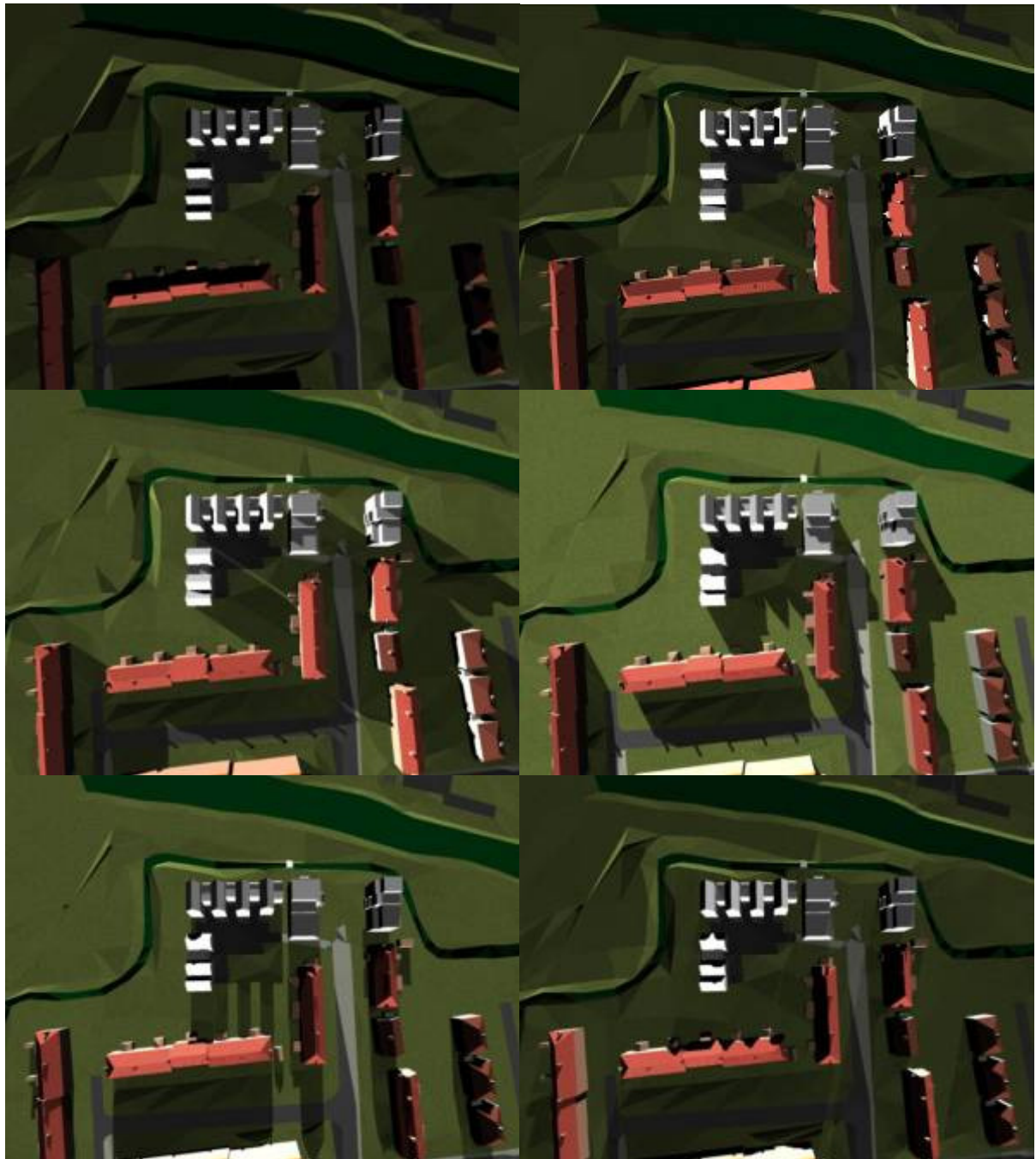
1st June @ 0800 hrs



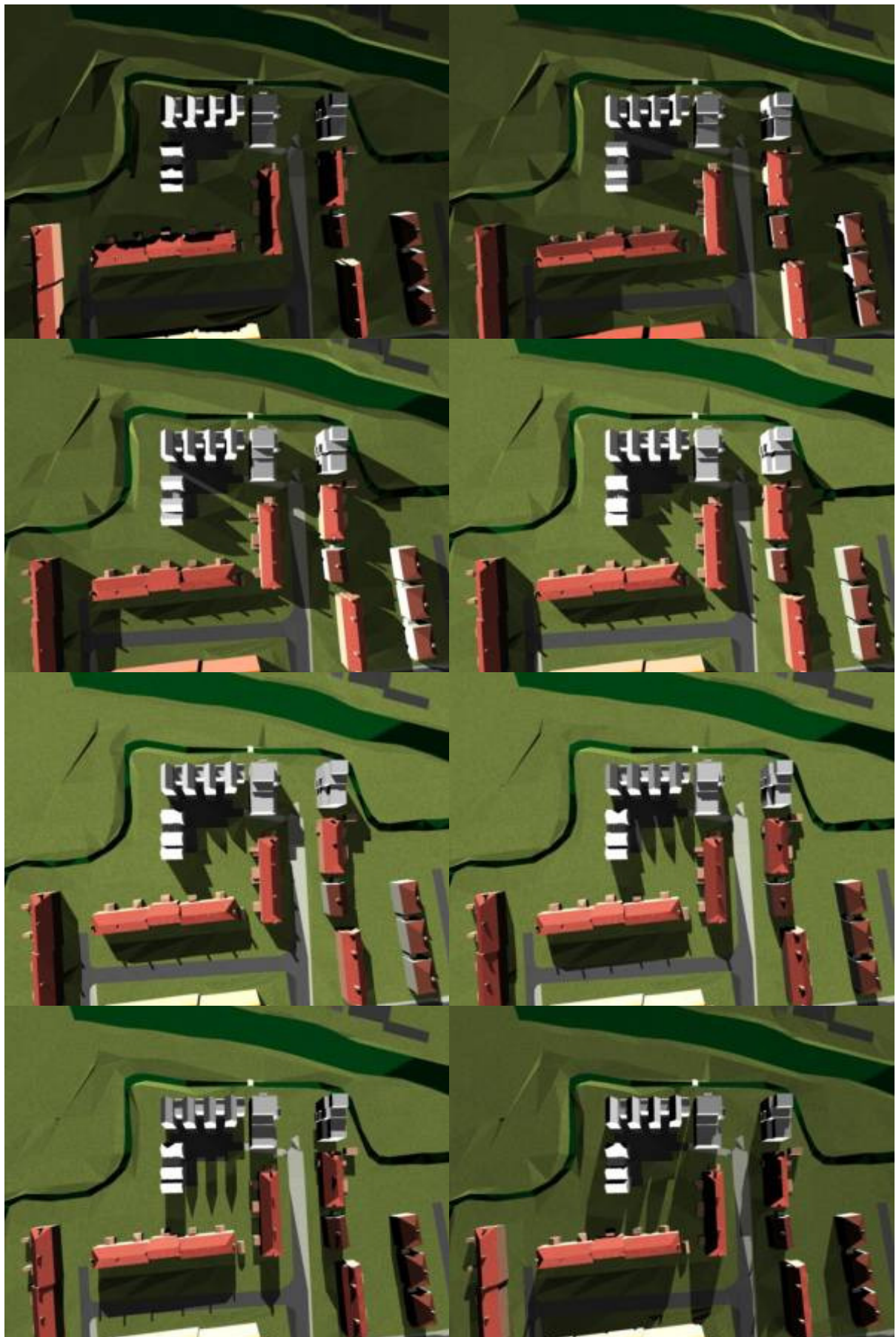
1st June @ 1630 hrs (above & below)



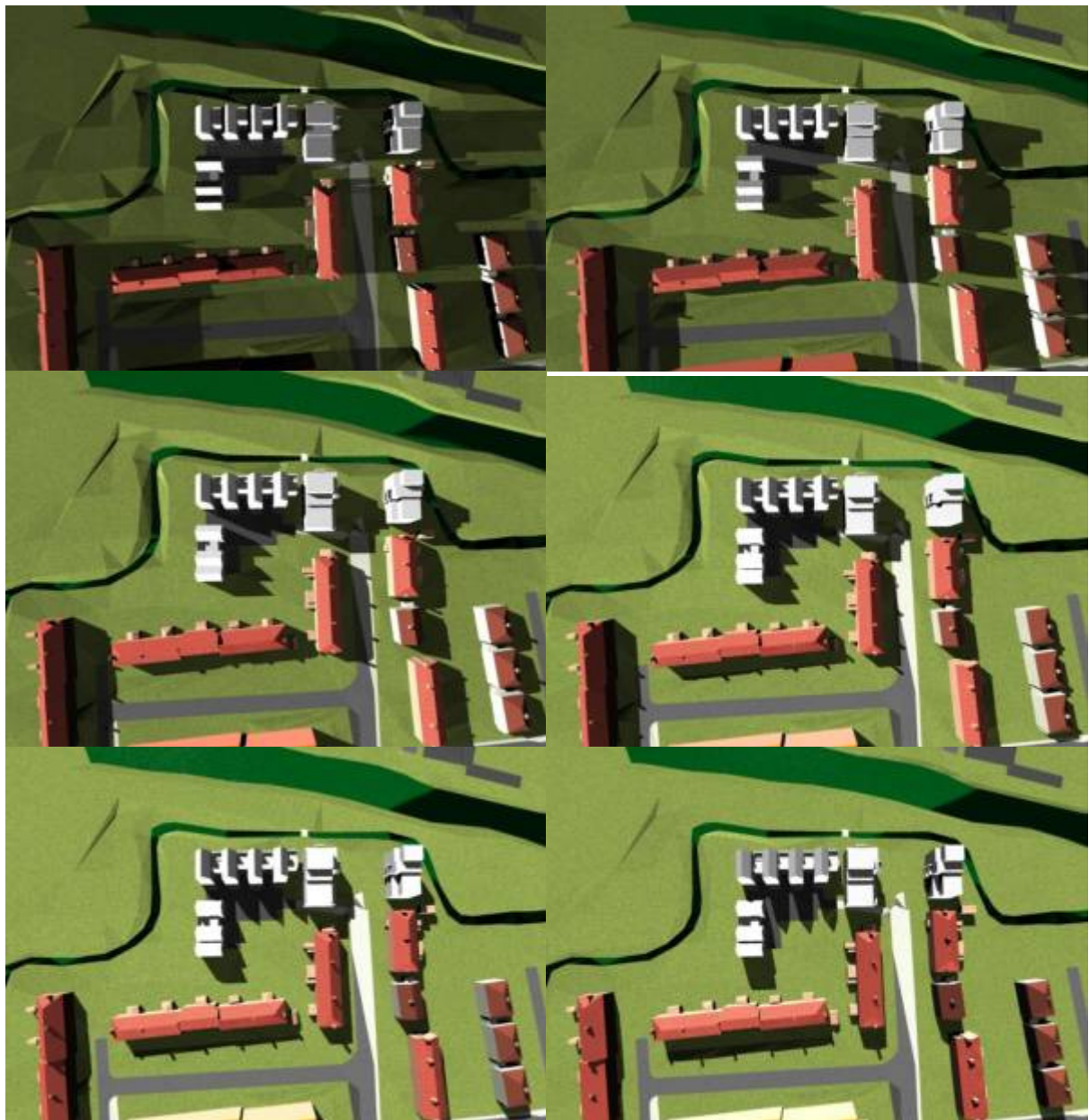
Shadow transitions on 1st January: @ 0900 to 1600 hrs



Shadow transitions on 1st February : @ 0900 to 1600 hrs

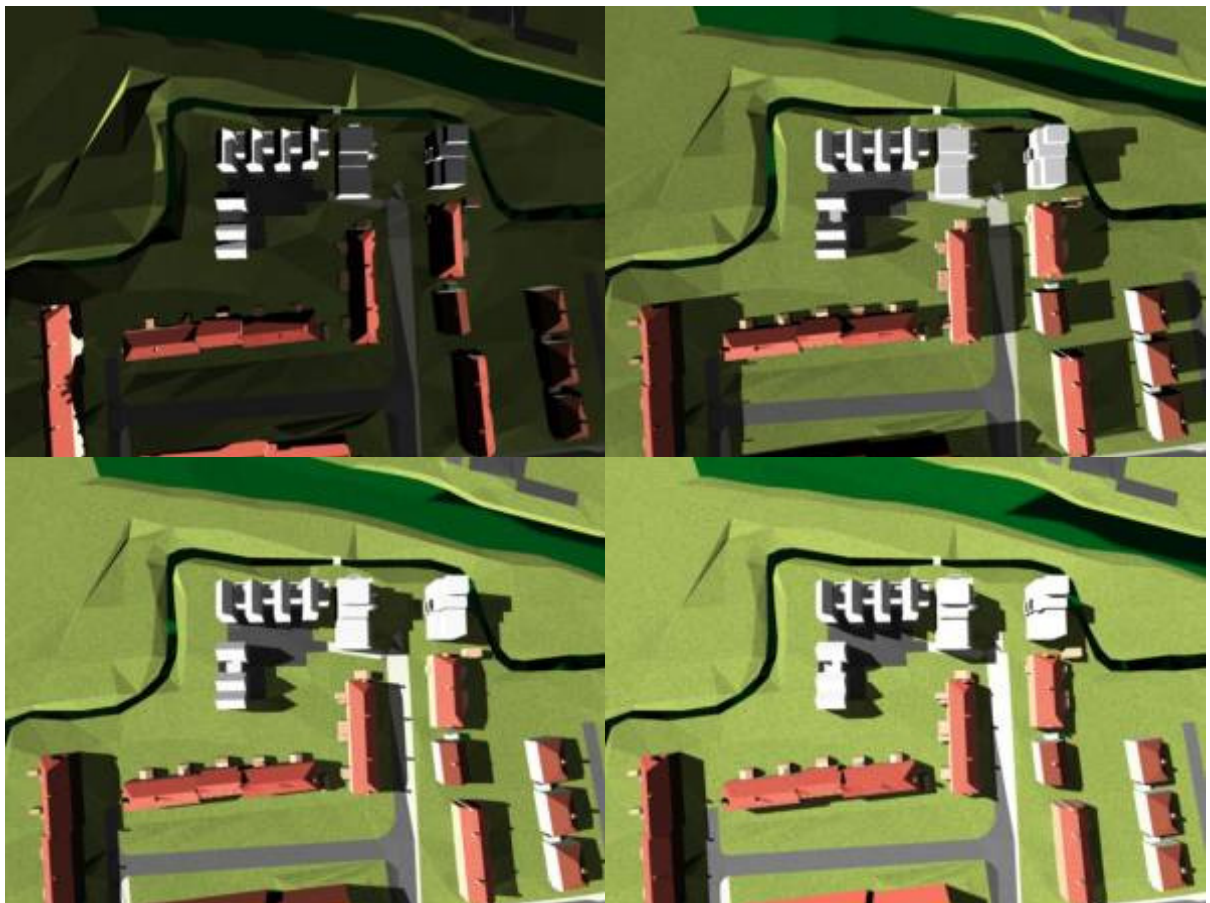


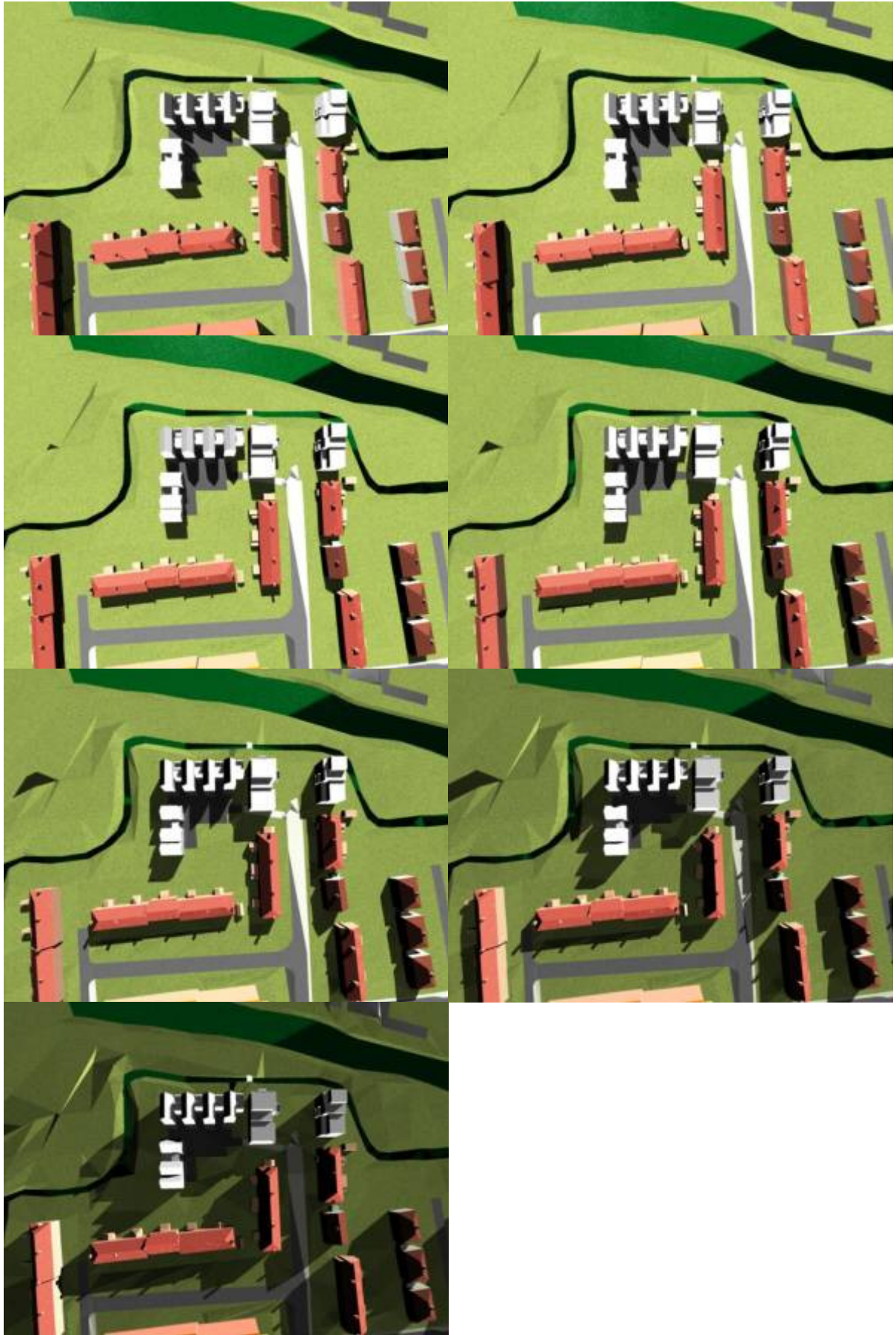
Shadow transitions on 1st March : @ 0800 to 1700 hrs



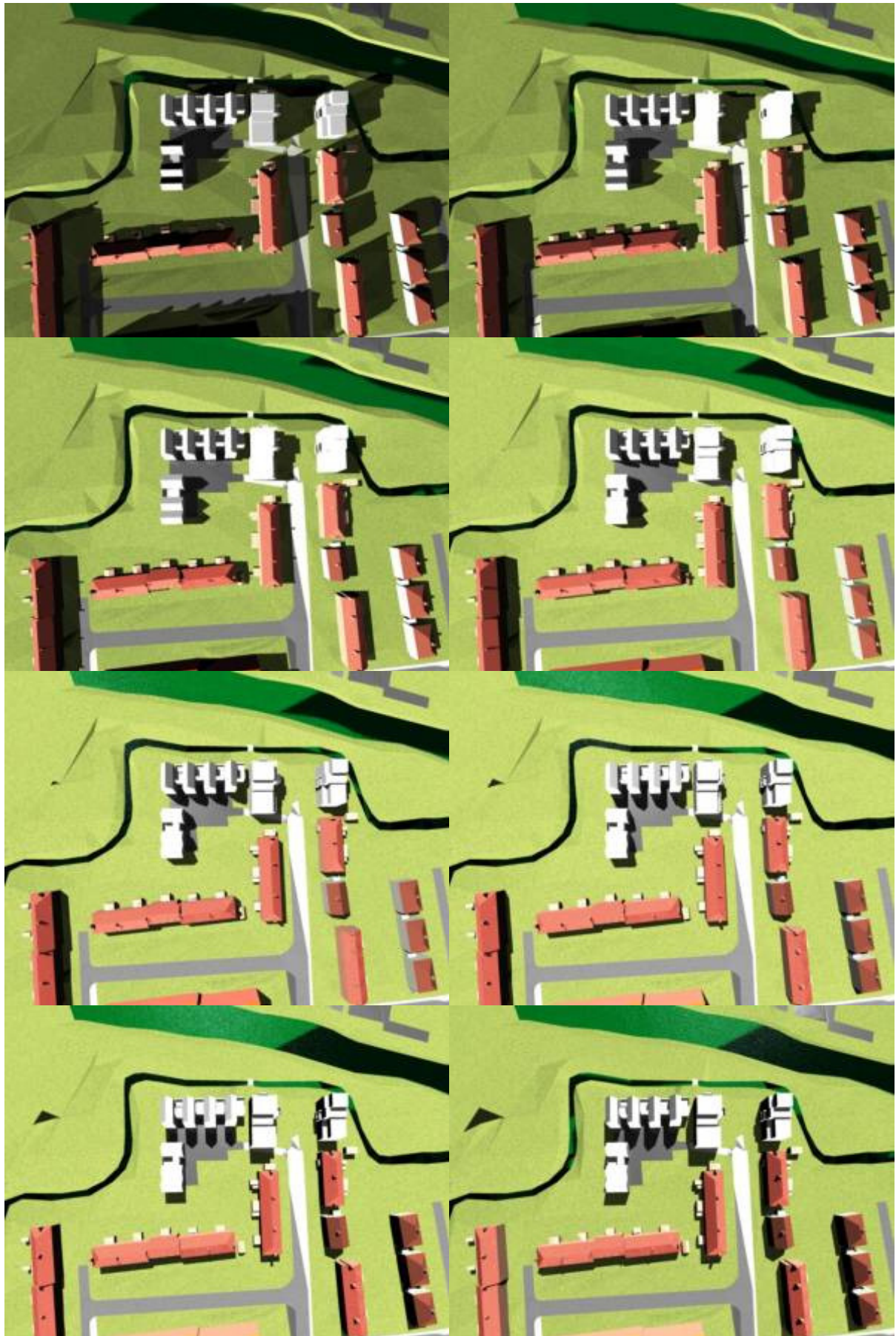


Shadow transitions on 1st April @ 0800 to 1800 hrs :



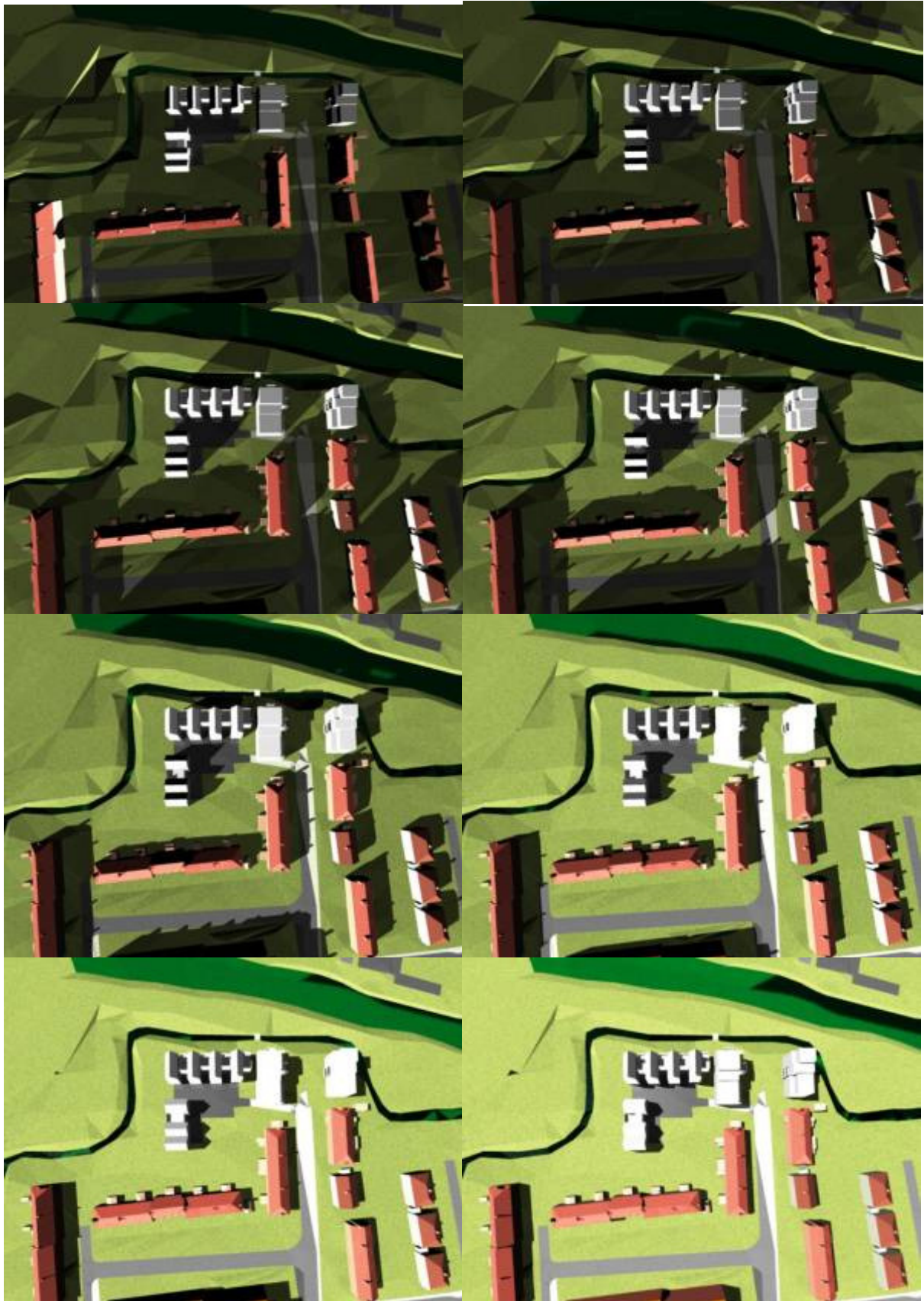


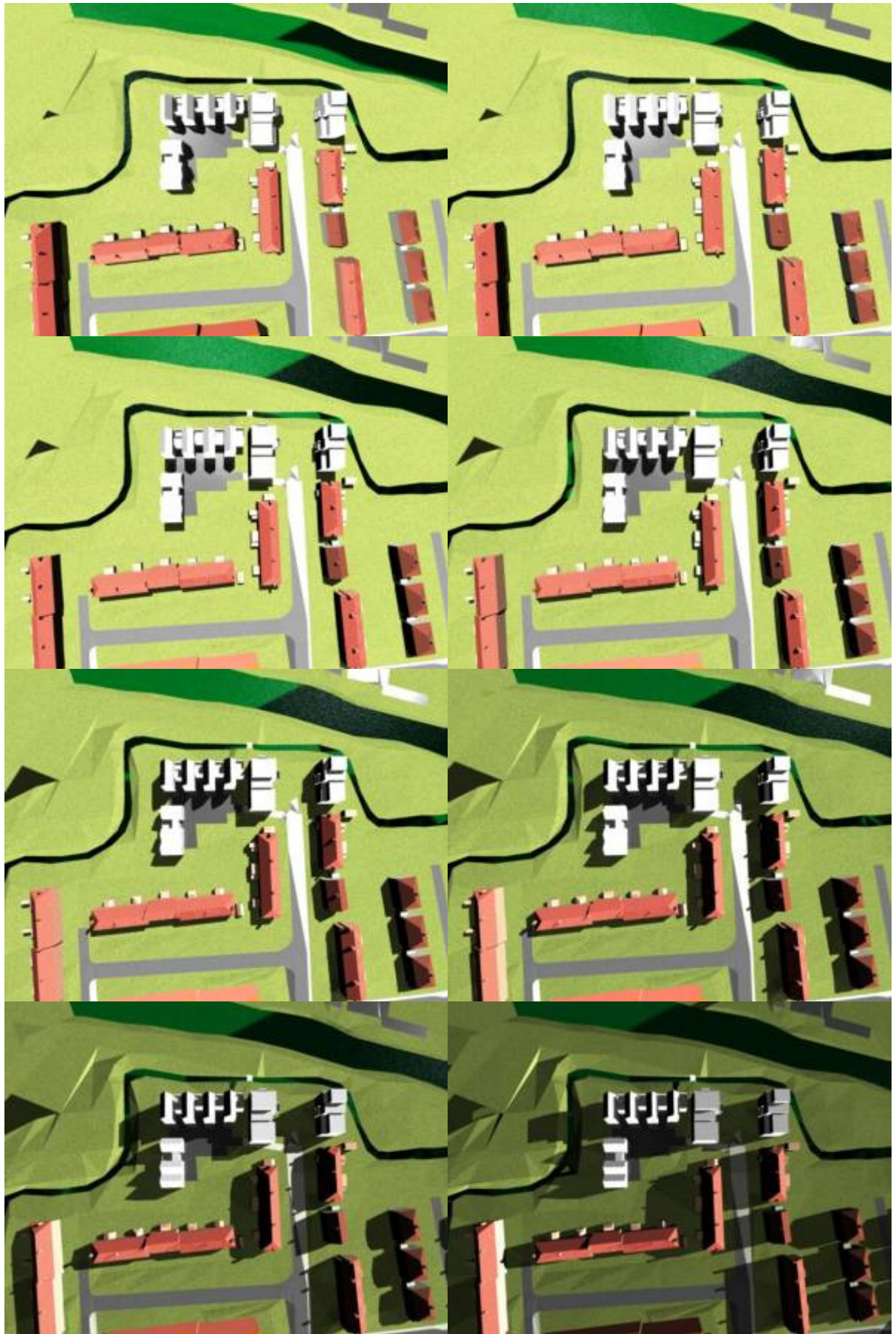
Shadow transitions on 1st May : @ 0700 to 1800 hrs



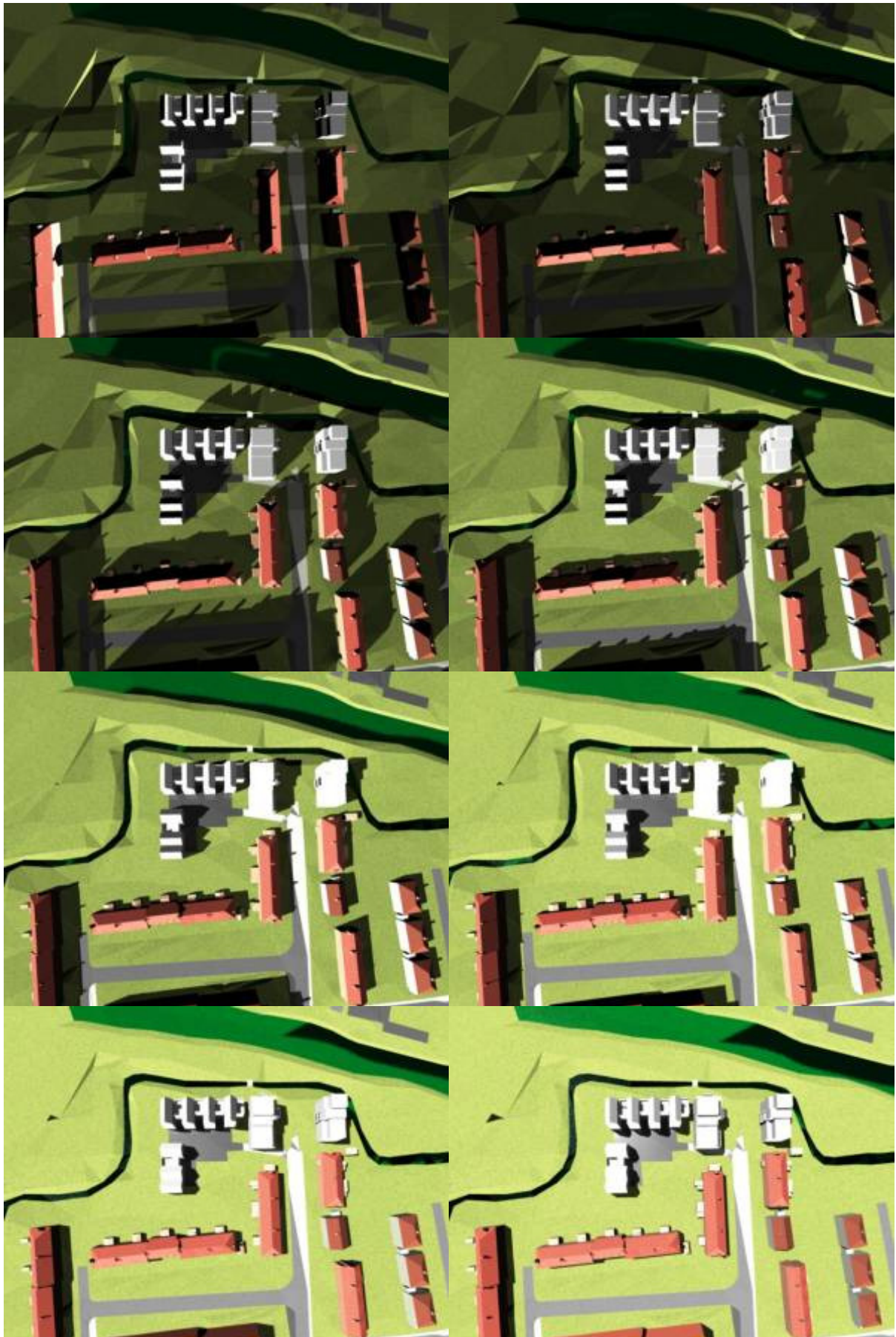


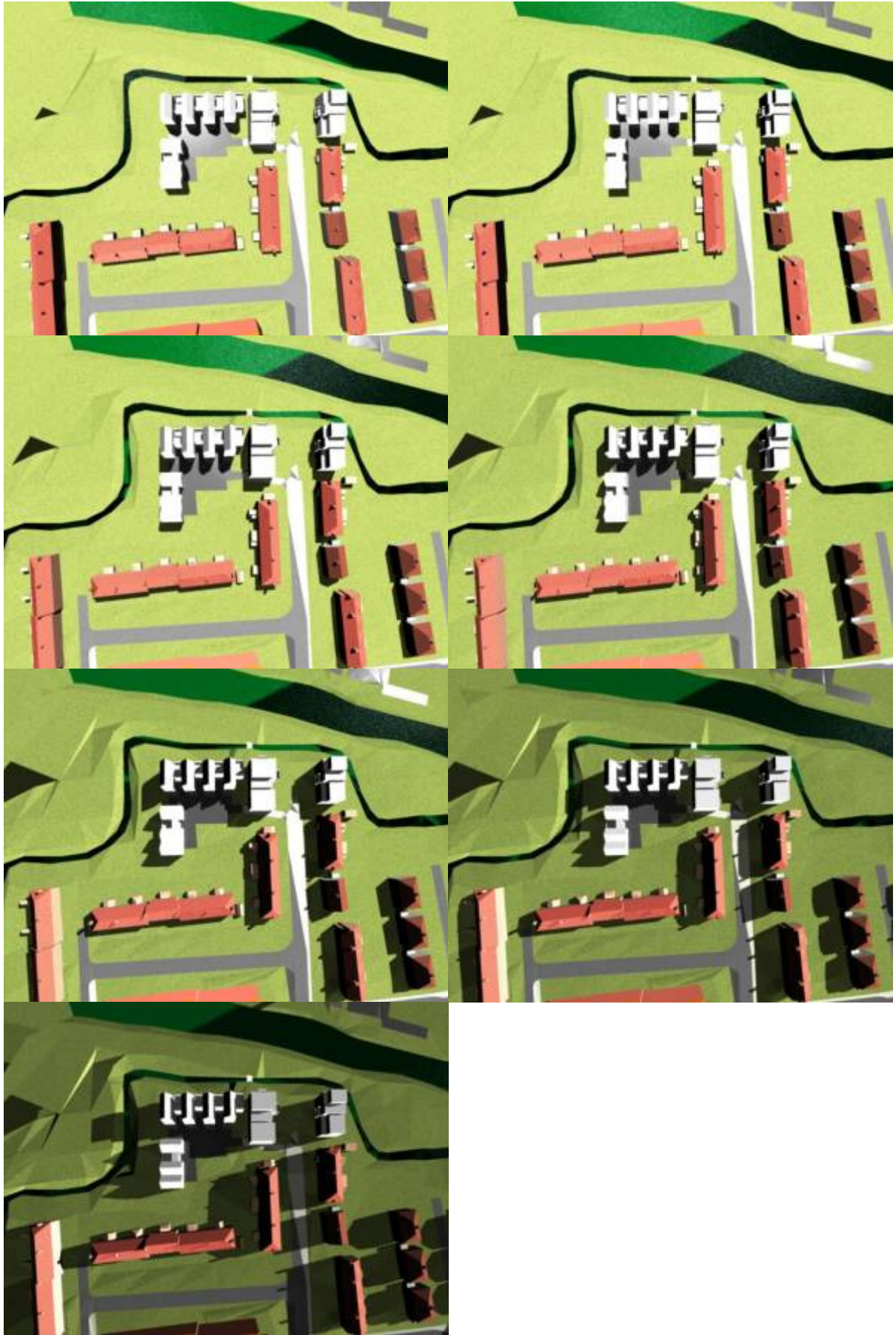
Shadow transitions on 1st June : @ 0500 to 1900 hrs





Shadow transitions on 1st July : @ 0500 to 1900 hrs:





END.