

London Borough of Merton
Sustainability Appraisal
Submission Draft Estates Local Plan
Stage 3 Consultation



Submission Draft
Estates Local Plan
Sustainability Appraisal

November 2016



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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 – 30 November 2016 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 [Submission Draft 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 and Draft Estates Local Plan SA Report published in February 2016.

N.2 Background to the Estates Local Plan

Circle Housing Merton Priory (CHMP), part of the wider Circle Housing Group, 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. Circle Housing Merton Priory (CHMP) is the majority landowner of the estates, owning about 60% of the three estates. CHMP 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 Circle Housing Merton Priory to ensure residents get the best out of any regeneration proposals for the three estates:

1. Circle Housing Merton Priory 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 Circle Housing Merton Priory.
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 Circle Housing Merton Priory 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. Circle Housing Merton Priory 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. Circle Housing Merton Priory will offer extra help and support for older people and/or disabled residents throughout the regeneration works.
8. Circle Housing Merton Priory 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, Circle Housing Merton Priory 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 Submission Draft ELP or [Stages B-D](#) of the SA process and assesses the options and policies considered in the development of the Plan. The document provides an appraisal of the Plan 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.

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>

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 CHMP

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 CHMP 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 CHMP 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 consultation on the ELP some changes have been made to the proposed policies in the revised Plan. The SA has carried out an assessment of all of the policies, including the revisions, in order to address issues raised in the previous consultations and 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 ongoing and a further report will be made to the Council to confirm the anticipated viability of the overall project, prior to the final submission to the Secretary of State. The current development assumptions will also 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 ongoing 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.

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 \(SA\)](#) Report has been published alongside the [Submission Draft Estates Local Plan - Stage 3 Consultation](#). The documents are both available on the Council's website at: <http://www.merton.gov.uk/estatesplan>

The consultation period will run from **December 2016-February 2017**.

If you would like to comment, representations can be made by post or email to:

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

Telephone: 020 8545 3837

Email: estatesplan@merton.gov.uk

Following the consultation period, all responses will be reviewed and taken into consideration before Submission to the Secretary of State for independent examination.

Submission Draft
**Estates Local Plan
Sustainability Appraisal**

November 2016

1 Introduction

- 1.1 This document provides a [Sustainability Appraisal \(SA\)](#) of the London Borough of Merton's [Submission Draft 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 and Draft Estates Local Plan SA Report published in February 2016.

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 Circle Housing Merton Priory (CHMP) is the majority landowner of the estates, owning about 60% of the three estates following Stock Transfer from the Council in 2010. CHMP will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes. CHMP, 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, CHMP 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. CHMP 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 CHMP's financial modelling.
- 1.3.3 All the CHMP 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 CHMP's ownership with the most viable regeneration potential. The regeneration of the estates offers the opportunity for CHMP 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 Circle Housing Merton Priory to ensure residents get the best out of any regeneration proposals for the three estates:

1. Circle Housing Merton Priory 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 Circle Housing Merton Priory.
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 Circle Housing Merton Priory 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. Circle Housing Merton Priory 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. Circle Housing Merton Priory will offer extra help and support for older people and/or disabled residents throughout the regeneration works.
8. Circle Housing Merton Priory 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, Circle Housing Merton Priory 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 has prepared the Submission Draft Estates Local Plan and Sustainability Appraisal (this document) to respond to the representations received.

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 2015 (and minor amendments 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>

1.5 What is this Document?

- 1.5.1 This document provides the [Sustainability Appraisal \(SA\)](#) of the Submission Draft ELP or [Stages B - D](#) of the SA process 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.

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 polices 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 A10](#).

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

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 CHMP 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

3.6.9 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.

3.6.10 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 CHMP 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

3.6.10 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.

3.6.11 Responses were also received from the following:

- **Savills on behalf of CHMP** - 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 CHMP, 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 CHMP 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>

- 3.6.12 This SA has been prepared in response to the representations received, in particular the need to assess the options that have been considered for the Estates and to explain the reasons for the selection and rejection of alternatives. Other amendments have 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 Review of the SA Process

- 3.7.1 As a consequence of the representations received, the London Borough of Merton commissioned [Jam Consult Ltd](#) 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. 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.
- 3.7.3 The assessment of options and policies has therefore been reviewed and a further assessment carried out, as set out in [Sections 7 and 8](#) of the report and the [Appendices](#).

3.8 Difficulties encountered in carrying out the SA

- 3.8.1 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.
- 3.8.2 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 the estates. Specific attention should be given to the uncertain impacts identified when considering the planning applications. The proposed 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 and positive impacts are maximised.
- 3.8.3 The financial modelling work for the regeneration is ongoing and a further report will be made to the Council to confirm the anticipated viability of the overall project, prior to the final submission to the Secretary of State. The current development assumptions will also 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 ongoing 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.
- 3.8.4 Monitoring of the impacts will be addressed through the annual Authority Monitoring Report (AMR). 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.

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 Circle Housing Merton Priory (CHMP), part of the wider Circle Housing Group, 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 this 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 CHMP 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/Geoenvironmental
 - 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; CI9 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 Mitcham**
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 Difficulties and limitation of baseline data

- 4.8.1 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.
- 4.8.2 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 CHMP 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 CHMP has undertaken technical surveys and financial planning work towards achieving this commitment. In CHMP'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 CHMP 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) CHMP 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, CHMP 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 CHMP'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	Will mixed, balanced and sustainable communities be created? Will a sense of cultural identity, belonging and well-being be achieved? Will support be provided for people from different equality groups?	<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	Will access to essential services and facilities be maintained and improved? Is the capacity of the existing services and facilities adequate e.g. Health, Education? Are there any services or facilities that are not currently accessible? Will new services and facilities be required?	<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	What design measures will be used to address crime and anti-social behaviour? Will 'Secured by Design' principles be used?	<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	What measures will be included to help improve the qualifications and skills of the population? What measures will be included to help difficult to reach groups access education and skills opportunities?	<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 CHMP, 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 (this report)

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 to date 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 CHMP 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 CHMP's commitments to improving the quality of life of its tenants, under the provision of the Stock Transfer Agreement with the Council, CHMP 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 this SA.

Option 1 – Refurbishment to Decent Homes (Merton Standard)

Refurbish all existing properties owned and managed by CHMP 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 CHMP 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 CHMP 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, CHMP 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 CHMP 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, CHMP faces difficulties in obtaining securitisation on such properties.
- 7.3.9 As a result of the initial work conducted by CHMP 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 Henglo 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 Henglo 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 CHMP 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

8.1.2 The overall vision for the ELP is:

“The creation of sustainable, well designed safe neighbourhoods with good quality new homes, that maintain and enhance a healthy local community, improve living standards and create good 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 recognises the existing estate’s experimental design and maintains 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 consistent design, form and character, using land efficiently to make the most of good transport services and create a distinctly urban character based on the “New London Vernacular” of traditional streets, front doors to streets, use of predominantly brick and good internal design and 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 CHMP 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 Geoenvironmental 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 4 (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 Geoenvironmental 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 2 (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 of 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 CHMP 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 CHMP'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, CHMP 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 Plan Policies

9.1 Development of the Plan Policies

9.1.1 The Draft Estates Local Plan will contain a number of policies, which will be used in the determination of the planning applications for the detailed proposals of the estates. An assessment of the Plan Policies has been carried out against the revised SA framework. 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.

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		EASTFIELDS POLICIES								Policies	
		E1	E2	E3	E4	E5	E6	E7	E8		
SO1	LAND USE	Green	Green	Green	Green	Green	Green	Green	Green	E1	Townscape
SO2	CLIMATE CHANGE	Grey	Grey	Grey	Orange	Yellow	Orange	Yellow	Green	E2	Street Network
SO3	WATER QUALITY	Grey	Grey	Grey	Yellow	Green	Green	Grey	Grey	E3	Movement & Access
SO4	WATER RESOURCES	Grey	Grey	Grey	Yellow	Grey	Yellow	Grey	Grey	E4	Land Use
SO5	SOIL & LAND QUALITY	Grey	Grey	Grey	Yellow	Green	Yellow	Grey	Grey	E5	Open Space
SO6	AIR QUALITY	Grey	Grey	Grey	Yellow	Grey	Yellow	Green	Grey	E6	Environ. Protection
SO7	NOISE	Grey	Grey	Grey	Yellow	Grey	Yellow	Green	Grey	E7	Landscape
SO8	TRANSPORT	Green	Green	Green	Yellow	Grey	Yellow	Green	Grey	E8	Building Heights
SO9	FLOOD RISK	Grey	Grey	Grey	Grey	Yellow	Green	Grey	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	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey		
SO13	ENERGY & CARBON	Grey	Grey	Grey	Orange	Grey	Orange	Grey	Green		
SO14	OPEN SPACE	Green	Green	Green	Green	Green	Green	Green	Green		
SO15	WASTE	Grey	Grey	Grey	Orange	Grey	Orange	Grey	Grey		
SO16	HOUSING	Grey	Grey	Grey	Green	Grey	Grey	Grey	Yellow		
SO17	ACCESS TO ACTIVITIES	Green	Grey	Green	Yellow	Green	Grey	Green	Grey		
SO18	SOCIAL DEPRIVATION	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey		
SO19	HEALTH & WELLBEING	Grey	Green	Grey	Green	Green	Yellow	Green	Grey		
SO20	DIVERSITY & EQUALITY	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey		
SO21	SERVICES & FACILITIES	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey		
SO22	CRIME	Green	Green	Green	Grey	Grey	Yellow	Grey	Grey		
SO23	EDUCATION & SKILLS	Grey	Grey	Grey	Grey	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		

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.

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.

- 9.4.3 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.

- 9.4.5 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. 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

- 9.4.5 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.

- 9.4.6 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

- 9.4.11 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

- 9.4.12 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

- 9.4.16 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

- 9.4.17 The regeneration of the Eastfields, High Path and Ravensbury Estates is considered as a single project for economic purposes by CHMP 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.
- 9.4.18 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 The financial modelling work for the regeneration is ongoing and a further report will be made to the Council to confirm the anticipated viability of the overall project, prior to the final submission to the Secretary of State. The current development assumptions will also 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 ongoing 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.
- 9.5.4 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 has been issued for consultation with the Submission Draft ELP. Following the Pre-Submission Publication Stage, the ELP and SA will be submitted to the Planning Inspectorate for Examination in Public. Should the Inspector require any Major Modifications to the ELP, these will be reviewed to see if the modifications would need to be subject to further SA. Any alterations would be subject to further consultation. 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 Policy 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 [Submission Draft 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 and Draft Estates Local Plan SA Report published in February 2016.

Background to the Regeneration of the Estates

11.3 Circle Housing Merton Priory (CHMP) is the majority landowner of the estates, owning about 60% of the three estates following Stock Transfer from the Council in 2010. CHMP will deliver any regeneration proposals as part of their requirement to achieve better housing standards on the three estates, known as Decent Homes. CHMP, as part of the wider Circle Housing Group, is one of the largest Housing Associations in the UK.

11.4 As a result of initial stock condition surveys and financial planning work, CHMP 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. CHMP 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 CHMP's financial modelling.

11.5 All the CHMP 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.

11.6 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.

- 11.7 These two work streams were combined and clearly identified Eastfields, High Path and Ravensbury as the three estates within CHMP's ownership with the most viable regeneration potential. The regeneration of the estates offers the opportunity for CHMP 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

- 11.8 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 2015 (and minor amendments 2016)
 - Merton's Core Planning Strategy 2011
 - The South London Waste Plan 2012
 - Sites and Policies Plan 2014
 - Policies Map 2014.

The Sustainability Appraisal

- 11.9 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. 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.
- 11.10 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 CHMP and the supporting technical documents prepared by independent consultants that were used to inform the findings.

Selection and Rejection of Options

- 11.11 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 CHMP 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.

11.12 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)

11.13 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.

11.14 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.

11.15 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.

11.16 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.

11.17 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 CHMP 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.

11.18 The regeneration of the Estates over the 50 year life cycle would deliver the greatest regeneration benefits having regard to CHMP'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.

11.19 Furthermore, CHMP 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.

- 11.20 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

- 11.21 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

- 11.22 Following the consultation period the ELP and RSA will be submitted to the Planning Inspectorate for Examination in Public. Should the Inspector require any Major Modifications to the ELP, these will be reviewed to see if the modifications would need to be subject to further SA. Any alterations would be subject to further consultation. 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.

London Borough of Merton
Sustainability Appraisal
Submission Draft Estates Local Plan
Stage 3 Consultation



Submission Draft Estates Local Plan
Sustainability Appraisal
APPENDICES

November 2016

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A1 SA and SEA requirements

A Sustainability Appraisal is required Under Section 19(5) of the Planning and Compulsory Purchase Act 2004 (the 2004 Act). Sustainability Appraisal (SA) of all Local Development Documents (LDD), including Development Plan Documents (DPD), is mandatory.

Sustainability Appraisals also need to satisfy the requirements of the European Directive 2001/42/EC (transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12), which requires formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. The focus of SEA is environmental effects.

Whilst the Directive defines the environment broadly, in that it includes factors such as population, human health and cultural heritage, SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic. SA under the 2004 Act incorporates the requirements of the SEA Directive.

The requirements of the Directive and the location of the information within the SA report are set out overleaf.

Information required in the Environment Report according to the SEA Directive

Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.

The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2). The information to be given in the report is set out in Article 5 and Annex I of the Directive as follows:

SEA Directive Requirements		Location in SA Report
a	An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plan and programmes	Non-technical summary Sections 1, 2 and 4 of SA report
b	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping report and Section 4
c	The environmental characteristics of areas likely to be significantly affected	Scoping Report, Issues & Option SA and Sections 4 and 5
d	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Sections 4 and 5
e	The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Sections 4 and 5, Appendix A4
f	The likely significant effects on the environment, including 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 factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Section 8 and 9, Appendices A3-A8
g	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Section 9 and Appendices A5-A6
h	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Sections 7 and 8, Appendix A5
i	A description of measures envisaged concerning monitoring in accordance with Article 10 Sections 2 and 9	Section 10
j	A non-technical summary of the information provided under the above headings.	Non-technical summary

SEA Directive Requirements		Location in SA Report
Consultation:		
<ul style="list-style-type: none"> authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). 		Scoping report issued to statutory consultees for consultation. Responses to consultation provided in Section 3.6 of the SA Report and Council website
<ul style="list-style-type: none"> authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) 		Scoping Report, September 2014 Issues & Options SA Report, September 2014 Draft Estates Local Plan SA Report, Feb. 2016 Revised dELP SA Report, October 2016
<ul style="list-style-type: none"> other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 		N/A
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8) Provision of information on the decision:		
<p>When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> the plan or programme as adopted a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with the measures decided concerning monitoring (Art. 9 and 10) 		N/A
Monitoring		
<ul style="list-style-type: none"> of the significant environmental effects of the plan's or programme's implementation (Art. 10) 		N/A
Quality assurance:		
<ul style="list-style-type: none"> environmental reports should be of a sufficient standard to meet the requirements of the SEA checklist Directive (Art. 12). 		

A2 Plans, Policies and Programmes

All of the plans and programmes influence Merton's Local Plan documents to some degree. The London Plan, as the spatial strategy for London, the various Mayoral strategies and the adopted Merton plans, strategies and guidance including the Core Planning Strategy and Sites and Policies Plan are of particular relevance.

International	
Policy or Plan	
Kyoto Protocol to the United Nations Framework convention on climate change (1997)	
Johannesburg Declaration on Sustainable development 2002	
European	
Policy or Plan	
EU Biodiversity Strategy (1998)	
EU Biodiversity Action Plan (2006)	
European Landscape Convention (ratified by the UK Government in 2006)	
EU Sixth Environment Action Plan (Sustainable Development Strategy) (2002)	
European Spatial Development Perspective Report (1999)	
EU Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)	
EU Directives	
Air Quality Framework (EU Directive 96/62/EC and daughter directives (99/30/EC), (2000/69/EC), (2002/3/EC)	
Assessment of the Effects of Certain Public and Private Projects on the Environment (EIA Directive 85/337/EEC)	
Assessment and Management of Environmental Noise (END Directive 2002/49/EC)	
Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)	
Conservation of Wild Birds (Directive 79/409/EEC)	
Energy Performance of Buildings (EU Directive 2002/91/EC)	
Energy Efficiency (Directive 2012/27/EU)	
Floods Directive (EU Directive 2007/60/EC)	
Landfill Directive 1999/31/EC	
Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)	
Renewable Energy (EU Directive 2009/28/EC)	
Strategic Environmental Assessment (SEA Directive 2001/42/EC)	Requires the formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. The focus of SEA is environmental effects.
Urban Waste Water Directive (91/271/EEC)	
Waste Framework Directive 75/442/EEC	
Water Framework Directive (EU Directive 2000/60/EC)	

National	
Regulations	
Air Quality Standards Regulations (2010)	These Regulations replace the Air Quality Standards Regulations 2007 implement the following Directives: Directive 2008/50/EC on ambient air quality and cleaner air for Europe (this Directive replaces Council Directive 96/62/EC on ambient air quality assessment and management, Council Directive 1999/30 EC relating to limits for sulphur dioxide, nitrogen dioxide, oxides of nitrogen, particulate matter and lead in ambient air, Council Directive 2000/69/EC relating to limit values for benzene and carbon monoxide in ambient air, Council directive 2002/3/EC relating to ozone in ambient air.) Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air.
Conservation of Habitat and Species Regulations, 2010	The Conservation of Habitats and Species Regulations 2010 (the “Habitats Regulations”) consolidate and update the Conservation (Natural Habitats, &c.) Regulations the 1994 Regulations”).
Building Regulations: England and Wales (Part L – Conservation of Fuel and Power, 2010) and (Part G Sanitation, hot water safety and water efficiency, 2010)	Part L – Conservation of fuel and power. The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect on 1 October 2010 and provide practical guidance on ways of complying with the energy efficiency requirements and regulation 7 of the Building Regulations 2010 (SI2010/2214) for England and Wales. The 2010 edition of Approved Document G - Sanitation, hot water safety and water efficiency, has been updated to incorporate amendments made to reflect any changes arising as a result of the Building Regulations 2010 and replaces the previous edition of Approved Document G - Sanitation, hot water safety and water efficiency.
Climate Change Act (2008)	The Climate Change Act creates a new approach to managing and responding to climate change in the UK, by: <ul style="list-style-type: none"> • setting ambitious, legally binding targets, including a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050 and 34% by 2020 against a 1990 baseline. • taking powers to help meet those targets • strengthening the institutional framework • enhancing the UK’s ability to adapt to the impact of climate change • establishing clear and regular accountability to the UK Parliament and to the devolved legislatures
Community Infrastructure Levy Regulations 2010 (and subsequent amendments)	The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area.
Deregulation Act 2015	The Deregulation Act provides for the removal or reduction of burdens on businesses, civil society, individuals, public sector bodies and the taxpayer. As far as is practicable all necessary technical housing standards should now be included in the main building regulations rather than within development plans. The act provides for an amendment to be made to the Planning and Energy Act 2008. Section 1(1)(c) of that Act provides that local planning authorities may include in their plans requirements that development in their area meets higher standards of energy efficiency than are required by building regulations. Government policy meanwhile is that new dwellings meet a zero net carbon emissions standard from 2016. Building regulations should also provide for optional requirements. Local planning authorities will be able, where circumstances justify it, to make it a condition of planning permission for developments that they comply with one or more such optional requirements, which will then apply to the development as building regulations requirements, and be inspected and enforced as such.

National	
Policy or Plan	Summary of objectives and targets
Regulations	
Energy Act 2008	The Energy Act 2008 updates energy legislation to: <ul style="list-style-type: none"> • reflect the availability of new technologies and emerging renewable technologies • correspond with the UK's changing requirements for secure energy supply • protect our environment and the tax payer as the energy market changes
Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts
Environmental Noise (England) Regulations 2006 (as amended)	The regulations transpose the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.
Flood and Water Management Act 2010	The Act updates legislation to ensure; better protection from flooding, manage water more sustainably, improve public services and secure water resources during periods of drought. The Flood and Water Management Act imparts significant new roles and responsibilities on local authorities. County or unitary authorities are now classed as lead local flood authorities (LLFAs) who have responsibilities for managing local flood risk. The responsibilities of a LLFA include: <ul style="list-style-type: none"> • prepare and maintain a strategy for local flood risk management in their areas, co-ordinating views and activity with other local bodies and communities through public consultation and scrutiny, and delivery planning. • maintain a register of assets – these are physical features that have a significant effect on flooding in their area • investigate significant local flooding incidents and publish the results of such investigations • establish SuDS approval bodies (SABs) that will be responsible for the approval of design, build and adoption of SuDS • issue consents for altering, removing or replacing certain structures or features on ordinary watercourses • play a lead role in emergency planning and recovery after a flood event
Growth and Infrastructure Act 2013	The Act sets out a series of reforms intended to reduce the red tape that the government considers hampers business investment, new infrastructure and job creation.
Housing and Planning Act 2016	Through this Act, the Government aims to take forward proposals to build more homes that people can afford, give more people the chance to own their own home, and ensure the way housing is managed is improved. This Act seeks to achieve this, in part, by implementing reforms that will make sure that the planning system does not add any unnecessary obstacles to the delivery of new homes. The Act includes provision for the delivery of Starter Homes and Social Housing. The Act also provides for “permission in principle” (“PIP”) for housing-led development which will provide developers with greater certainty of consent at an earlier stage in the development cycle.
Local Government White Paper: Strong and Prosperous Communities (2009)	The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship between central government, local government and local people.

National	
Policy or Plan	Summary of objectives and targets
Regulations	
Natural Environment and Rural Communities Act (2006)	The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy. The Act was published by Parliament and is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.
Planning and Compulsory Purchase Act (2004)	The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government's policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.
Planning and Energy Act (2008)	This Act allows local councils to set targets in their areas for on-site renewable energy, on-site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.
Planning Act (2008)	The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new stream-lined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the town and country planning system and the introduction of a Community Infrastructure Levy (CIL).
Localism Act 2011	The Localism Act takes power from central government and hands it back to local authorities and communities - giving them the freedom and flexibility to achieve their own ambitions. There are five key measures in the Localism act: <ul style="list-style-type: none"> • Community Rights • Neighbourhood Planning • Housing • Empowering cities and other local areas • General power of competence Different parts of the Act will come into effect at different times.
Neighbourhood Planning Regulations 2012	The Regulations set out the procedure for the designation of neighbourhood areas and neighbourhood forums and for the preparation of neighbourhood development plans and neighbourhood development orders (including community right to build orders).
Sustainable Communities Act 2007 (Amended 2010) and Sustainable Communities Regulations 2012	The Sustainable Communities Act 2007 provides an opportunity for communities to identify legislative barriers that prevent them from improving the sustainability of their local areas and discuss them with their local authorities. If the barrier needs Government action to remove it, local authorities can ask government to remove it.
Town and Country Planning Act (1990)	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales
The Town and Country Planning (Environmental Impact Assessment) (Amendment) (England) Regulations 2008	These Regulations amend the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1991 so that they apply to applications for subsequent approval of matters under conditions attached to planning permissions.

National	
Policy or Plan	Summary of objectives and targets
Regulations	
The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999	These regulations outline the procedure for considering environmental impact when deterring planning permission applications.
The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 And Amendment 2015	These Regulations replace the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (SI No. 293) (“the 1999 Regulations”) and subsequent amending instruments. The Town and Country Planning (Environmental Impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales. These regulations provide a consolidation of the 1999 regulations to reflect amendments to the EIA directive and recent case law.
The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995	These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.
The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2010	This order amends the GDPO 1995 in relation to: <ul style="list-style-type: none"> • Design and access statements • Publicity of planning applications • Time limits for lodging certain planning appeals • Provisions to include on the planning register applications for non-material amendments
The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012	The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country Planning (General Permitted Development) Order 1995 (“GPDO”) by: <ul style="list-style-type: none"> • adding a new Part 43 to Schedule 2 to introduce permitted development rights for solar panels, ground and water source heat pumps, and flues forming part of biomass and combined heat and power systems installed on non-domestic premises. • inserting new paragraphs into Parts 6 and 7 of Schedule 2 to clarify that permitted development rights can apply under those Parts to structures to house biomass boilers, anaerobic digestion systems and associated waste and fuel stores, and hydro turbines installed on agricultural and forestry units, and • amending paragraph J of Part 40 of Schedule 2 (interpretation of Part 40) to delete the words “product and installation” from the definition of “MCS Planning Standards”.
The Town and Country Planning (Local Planning) (England) Regulations 2012	The Regulations (a) consolidate the existing Town and Country Planning (Local Development) (England) Regulations 2004 and the amendments made to them; and (b) make new provision and amendments to take account of the changes made by the Localism Act 2011.
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010	This amendment introduces a definition of houses in multiple occupation into the Use Classes Order.
The Water Resources Act 1991 (Amendment) E&W Regulations 2009	This Act aims to prevent and minimise pollution of water. The policing of this act is the responsibility of the Environment Agency. Under the act it is an offence to cause or knowingly permit any poisonous, noxious or polluting material, or any solid waste to enter any controlled water. Silt and soil from eroded areas are included in the definition of polluting material. If eroded soil is found to be polluting a water body or watercourse, the Environment Agency may prevent or clear up the pollution, and recover the damages from the landowner or responsible person.

National	
Policy or Plan	Summary of objectives and targets
Regulations	
The Water Act 2003	<p>The four broad aims of the Act are:</p> <ul style="list-style-type: none"> • the sustainable use of water resources; • strengthening the voice of consumers; • a measured increase in competition; and • the promotion of water conservation.
Planning Policy	
National Planning Policy Framework March 2012	<p>The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. For plan-making this means that:</p> <ul style="list-style-type: none"> • local planning authorities should positively seek opportunities to meet the development needs of their area; • Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted. <p>For decision-taking this means:</p> <ul style="list-style-type: none"> • approving development proposals that accord with the development plan without delay; and • where the development plan is absent, silent or relevant policies are out of date, granting permission unless: <ul style="list-style-type: none"> - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted.
Technical Guidance to the NPPF March 2012	<p>This document provides additional guidance to local planning authorities to ensure the effective implementation of the planning policy set out in the National Planning Policy Framework on development in areas at risk of flooding and in relation to mineral extraction. This guidance retains key elements of Planning Policy Statement 25 and of the existing minerals policy statements and minerals planning guidance notes which are considered necessary and helpful in relation to these policy areas. The retention of this guidance is an interim measure pending a wider review of guidance to support planning policy.</p>
National Planning Practice Guidance (updated 2015)	Provides guidance on how to implement the NPPF.

National	
Policy or Plan	Summary of objectives and targets
Government Strategies	
Air Quality Strategy DEFRA 2007	The strategy sets out air quality objectives and policy options to further improve air quality in the UK from today into the long term. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment.
Air Pollution: Action in a changing Climate 2010	This 'forward look' document does not replace the current air quality strategy but accounts for the rapid development of climate change policy since the strategy was published in 2007.
Biodiversity – The UK Action Plan (1994)	The Action Plan is the UK Government's response to the Convention on Biological Diversity (CBD) signed in 1992. It describes the UK's biological resources and commits a detailed plan for the protection of these resources. The Government published the first lists of Priority Species and Habitats in 1995 as part of the UK Biodiversity Action Plan (UK BAP), which included over 300 species.
Natural England's – England Biodiversity (2002)	<p>England Biodiversity Strategy was published in 2002. It brings together England's key contributions to achieving the 2010 target to halt biodiversity loss. It also seeks to make biodiversity part of mainstream thinking and emphasises that healthy, thriving and diverse ecosystems are essential to everybody's quality of life and wellbeing. The Strategy has five themes:</p> <ul style="list-style-type: none"> • Protecting the best wildlife sites • Promoting the recovery of declining species and habitats • Embedding biodiversity in all sectors of policy and decision making • Enthusing people • Developing the evidence base. <p>An important aim of the strategy is to deliver the UK Biodiversity Action Plan in England, and a measure of success of conserving England's biodiversity is how the status of priority species and habitats is changing.</p>
Biodiversity 2020: A strategy for England's wildlife and ecosystems 2011	Provides a comprehensive picture of how the international and EU commitments are being implemented. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The strategy aims to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.
Securing the Future – UK Sustainable Development Strategy (2005)	<p>This sets out the national framework for Sustainable Development based on 4 central aims:</p> <ul style="list-style-type: none"> • social progress which recognises the needs of everyone • effective protection of the environment • prudent use of natural resources • maintenance of high and stable levels of economic growth and employment <p>The strategy sets five guiding principles to achieve sustainable development:</p> <ul style="list-style-type: none"> • living within environmental limits • ensuring a strong, healthy and just society • achieving a sustainable economy • promoting good governance • using sound science responsibly

National	
Policy or Plan	Summary of objectives and targets
Government Strategies	
Sustainable Construction Strategy (2008)	<p>This Strategy is aimed at providing clarity around the existing policy framework and signalling the future direction of Government policy. It aims to realise the shared vision of sustainable construction by:</p> <ul style="list-style-type: none"> • Providing clarity to business on the Government's position by bringing together diverse regulations and initiatives relating to sustainability • Setting and committing to higher standards to help achieve sustainability in specific areas • Making specific commitments by industry and Government to take the sustainable construction agenda forward
UK Low Carbon Transition Plan (2009)	<p>The low carbon transition plan sets out how the government is to meet its binding carbon budget – an 18% cut in emissions on 2008 levels by 2020 (34% on 1990 levels). It also allocated individual carbon budgets for the major UK government departments, which are expected to produce their own plans.</p>
Carbon Plan 2011	<p>The Carbon Plan, published in December 2011, sets out the Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the 2050 target. This publication brings together the Government's strategy to curb greenhouse gas emissions and deliver our climate change targets, as well as the updated version of our actions and milestones for the next five years; replacing the draft Carbon Plan published in March 2011. Part 1, 2 and 3 of the report, Annex A and Annex B set out the Government's strategy for delivering carbon budgets and fulfil the legal obligation to report on what the UK is doing to ensure it meets carbon budgets set in law. Annex C of this report sets out, department by department, actions and deadlines for the next five years.</p>
Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (DECC 2012)	<p>This is an Energy Efficiency Strategy to maximise existing policy and realise the wider energy efficiency potential that is available in the UK economy.</p>
Laying the Foundations: A Housing Strategy for England (2011)	<p>A radical new strategy to reignite the housing market and get the nation building again was launched on 21 November by the Prime Minister. The Housing Strategy sets out a package of reforms to:</p> <ul style="list-style-type: none"> • get the housing market moving again • lay the foundations for a more responsive, effective and stable housing market in the future • support choice and quality for tenants • improve environmental standards and design quality. <p>The new strategy addresses concerns across the housing market making it easier to secure mortgages on new homes, improving fairness in social housing and ensuring homes that have been left empty for years are lived in once again.</p>
National Flood and Coastal Erosion Risk Management Strategy for England, 2011	<p>This document contains the following information: Understanding the risks, empowering communities, building resilience: the national flood and coastal erosion risk management strategy for England</p>

National	
Policy or Plan	Summary of objectives and targets
Government Strategies	
Water Strategy Future Water: The Government's Water Strategy for England (2008)	<p>The overarching aim of the Water Strategy is to improve standards of service and quality, through sustainable water management, whilst achieving a balance between environmental impacts, water quality of surface and ground waters, supply and demand, and social and economic effects. The intermediate outcomes are:</p> <ul style="list-style-type: none"> • No deterioration in water quality in the environment, aiming for improvement to good ecological status by 2015, and improved biodiversity and ecology with increased value from sustainable recreation • Climate change mitigation and adaptation • Sustainable use of water resources with no essential supply interruptions during drought • High levels of drinking water quality • Fair, affordable and cost-reflective charges.
Waste Strategy (2007)	<p>This new strategy builds on Waste Strategy 2000 (WS2000) and the progress since then but aims for greater ambition by addressing the key challenges for the future through additional steps. The Government's key objectives are to:</p> <ul style="list-style-type: none"> • decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use; • meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020; • increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste; • secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste; and • get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.
UK Sustainable Procurement Action Plan (2007)	<p>The Government launched a package of actions to deliver the step change needed to ensure that supply chains and public services will be increasingly low carbon, low waste and water efficient, respect biodiversity and deliver wider sustainable development goals. The Action Plan puts in place clear lines of accountabilities and reporting, and develops plans to raise the standards and status of procurement practice in Government, which will strengthen delivery of these targets.</p>
Noise Policy Statement for England (DEFRA 2010)	<p>This statement sets out the long-term vision of Government noise policy, which is to promote good health and a good quality of life through the management of noise within the context of Government policy on sustainable development. The policy seeks to make explicit the implicit underlying principles and aims regarding noise management and control that are to be found in existing policy documents, legislation and guidance.</p>
Healthy lives, healthy people: our strategy for public health in England 2010 and update 2011	<p>The strategy sets out a bold vision for a reformed public health system in England including:</p> <ul style="list-style-type: none"> • Local authorities to take new responsibilities for public health • Local authorities to be supported by a new integrated public health service – Public Health England • A stronger focus to be placed on outcomes across the system • Public health as a clear priority and a core part of business • A commitment to reduce health inequalities.
DEFRA Sustainable Drainage Systems Non-Statutory Technical Standards for Sustainable Drainage Systems 2015	<p>This document sets out non-statutory technical standards for sustainable drainage systems. They should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance.</p>

National	
Policy or Plan	Summary of objectives and targets
Guidance and other Reference Documents	
Building Research Establishment Environmental Assessment Method (BREEAM)	
Environment Agency – Creating a better place. Our corporate strategy (2010-2015)	
Environment Agency – Climate Change, adapting for tomorrow (2009)	
Environment Agency – Water for people and the environment. Water resources strategy for England and Wales (2009)	
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)	
English Indices of Deprivation 2010	
National Heritage Protection Plan 2015-18	
Guidance on Tall Buildings CABI and English Heritage (2007)	
Model Procedures for the Management of Contaminated Land-Environment Agency.	

Regional	
Policy or Plan	Summary of objectives and targets
Air Quality	
Clearing London's Air - Air Quality Strategy (2010)	The strategy sets out a framework for improving London's air quality and measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues.
The Control of Dust and emission during construction and demolition (2014) SPG	
Accessibility and Equity	
Equal Life Chances for All framework 2014	The Equal Life Chances for All framework 2014 highlights the Mayor's commitment to tackling inequality; improving life chances and removing barriers that prevent people from reaching their full potential.
Accessible London: Achieving an Inclusive Environment. Mayor's Supplementary Planning Guidance (2014)	This provides detailed guidance on the policies contained in the London Plan to make places usable by everyone especially disabled people.
Planning for Equality and Diversity in London. Mayor's Supplementary Planning Guidance (2007)	This SPG provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan, which relate to equalities issues and addressing the needs of London's diverse communities.
Culture	
Cultural Strategy: Cultural Metropolis (2010)	The Mayor's Cultural Strategy sets out his vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. The strategy recognises the significance of the cultural and creative sectors in making London a successful world city, and puts forward a case for its continued support and investment – particularly in the run up to the 2012 Olympics and the opportunity it presents for London to undertake a step change in cultural activity and participation.
Economy	
Mayors Economic Development Strategy (2010)	The Mayor's vision is for London to be the best big city in the world. The Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor's ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world's leading low carbon capitals, for all Londoners to share in London's economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.
Energy and Climate Change	
Climate Change Mitigation and Energy Strategy (2011)	This Strategy has a positive message on targets. The strategy shows that if all the existing policies and programmes that are already in train – whether at national or local level – actually deliver as promised, it will be possible to get very close to London's ambitious CO2 reduction target of 60 per cent against 1990 levels. The Strategy also identifies the further measures needed to close the gap.
Draft Climate Change Adaptation Strategy for London (2010)	<p>The Mayor's Climate Change Adaptation Strategy:</p> <ul style="list-style-type: none"> • identifies who and what is most at risk today • analyses how climate change will change the risk of flood, drought and heat-wave through the century • describes what action is needed to manage the changes and who is responsible. <p>The key actions proposed in the strategy are:</p> <ul style="list-style-type: none"> • To improve our understanding and management of surface water flood risk • An urban greening programme to increase the quality and quantity of green space and vegetation in London – this will buffer us from floods and hot weather • To retro-fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes

Regional	
Policy or Plan	Summary of objectives and targets
Flood Risk	
Thames Region Catchment Flood Management Plan, 2009	This plan presents what the Environment Agency considers the most sustainable direction for the management of fluvial flood risk within the region for the next 50 to 100 years. The plan is based on extensive research into the catchment characteristics of the region and the options available for managing the risk to people, properties and the environment. The likely impacts of climate change and the plans for future development are also taken into account.
Regional Flood Risk Appraisal (2009)	The Mayor published the Regional Flood Risk Appraisal (RFRA) in October 2009. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed. The RFRA contains 19 recommendations, involving or lead by a range of organisations. Progress against the recommendations will be monitored annually in the London Plan Annual Monitoring Report.
Mayor of London: Regional Flood Risk Appraisal (2014)	The Regional Flood Risk Appraisal (RFRA) provides an overview of all sources of flooding in London and addresses its probability and consequences.
The Thames Estuary 2100 Plan (2012)	Recommends how to manage tidal flood risk to the end of the century and beyond. The plan sets out how 1.25 million people and £200 billion worth of property will continue to be protected from tidal flood risk.
Lower Thames Flood Risk Management Strategy 2010	The Lower Thames Flood Risk Management Strategy (LTFRMS) proposes measures to reduce the risk of flooding to the 15,000 properties which are currently at risk from a 1% flood event in the area from Datchet to Teddington. These measures include the construction of three flood diversion channels, the widening of Desborough Cut and improvements to Sunbury and Molesey Weirs and Teddington Lock. It also includes community based measures for improving resistance and resilience to flooding for smaller groups of properties and improving mapping information for emergency evacuation plans.
Thames River Basin Management Plan (2009)	The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) to promote the concept of sustainable water management. The aims of the plan is: <ul style="list-style-type: none"> • To safeguard the sustainable use of water • To protect and restore the status of aquatic ecosystems • To improve aquatic environments by the reduction of hazardous substances • To reduce groundwater pollution • To help mitigate the effects of flood and droughts
Health	
The London Health Inequalities Strategy (2010)	The strategy sets out the Mayor's framework to reduce health inequalities in the capital. Key aims of the strategy include encouraging physical activity, supporting long-term investment to reduce poverty, improving access to primary care and NHS services, supporting individuals to make healthier choices and promoting well-being in the workplace.
NHS London: Strategic Plan (2008-13)	A strategic plan that sets out an ambitious programme of work to deliver high-quality, value for money services.

Regional	
Policy or Plan	Summary of objectives and targets
Heritage	
Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment – English Heritage 2010	Whilst this guidance focuses on SEA/SA for development plans, including neighbourhood plans, it is equally applicable to the preparation of SEA/Sas for other types of documents such as Local Transport Plans and Water Resource Management Plans.
English Heritage’s Heritage at Risk Register – London 2011	Identifies listed buildings at risk from neglect, decay, under-use or redundancy in London.
Housing	
London Housing Strategy (2014)	The overriding aims of this strategy are to increase the supply of housing of all tenures and to ensure that these homes better support London’s continued economic success. The strategy is not just about supply; policies range from improving the existing stock to tackling rough sleeping – but supply is at the heart of it, underpinning each of its five key priorities
GLA Housing Design Guide 2010	The new ‘interim edition’ of the London Housing Design Guide sets out the Mayor of London’s aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.
Housing Mayor’s Supplementary Planning Guidance (2012)	This draft document sets out proposed guidance to supplement the housing policies in the 2011 London Plan (LP). In particular, it provides detail on how to carry forward the Mayor’s view that: “providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighbourhoods”. The SPG is informed by the Government’s draft National Planning Policy Framework and by its new Housing Strategy for England.
Draft Affordable Housing SPG 2012	The draft supplementary planning guidance note on affordable housing deals with how the Government’s new affordable rent housing product can be used to implement the policies in the Plan. The guidance deals both with setting affordable housing targets in Local Development Frameworks, and with negotiation of affordable housing on private residential and mixed use development sites.
Housing Standards 2016	Minor alterations to the London Plan on Housing Quality and Design, Housing Choice, Sustainable Design and Construction, Water Use and Supplies Policy and Lifetime Neighbourhoods Policy

Regional	
Policy or Plan	Summary of objectives and targets
Infrastructure	
Social Infrastructure SPG (2015)	This document contains guidance to support London Plan Policy 3.16 on the Protection and Enhancement of Social Infrastructure, as well as policies 3.17 Health and Social Care Facilities, 3.18 Education Facilities and 3.19 Sports Facilities. It particularly focuses on those elements of social infrastructure that face the biggest strategic challenges - specifically health, education, sport, faith and burials.
Central London Infrastructure Study (2009)	The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. In particular, as well as offering local authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate. This study also identifies existing gaps and shortfalls in infrastructure provision.
London Plan	
London Plan (2011) Further Alterations to the London Plan (FALP) 2015	<p>The London Plan describes an integrated economic, social, environmental and transport framework for the development of London over the next 20-25 years. London boroughs' local plans need to work within this larger structure, and its policies guide decisions on planning applications by councils and the Mayor. The new London Plan sets out to:</p> <ul style="list-style-type: none"> • Meet the needs of a growing population with policy on new homes, including affordable housing, housing design and quality, and social infrastructure, which will promote diverse, happy and safe local communities. • Support an increase in London's development and employment with policy on: outer London, inner and central London; finding the best locations for development and regeneration, and protecting town centres; encouraging a connected economy and improving job opportunities for everyone, so that London maintains its success and competitiveness. • Improve the environment and tackle climate change by: reducing CO2 emissions and heat loss from new developments; increasing renewable energy; managing flood risk, ensuring water supply and quality; improving sewerage systems; improving London's recycling performance and waste management; and protecting our open spaces making London a green and more pleasant place to live and visit. Ensure that London's transport is easy, safe and convenient for everyone and encourage cycling, walking and electric vehicles.
Noise	
London Agglomeration Noise Action Plan (2010)	The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008.
Souder City: The Mayors Ambient Noise Strategy (2004)	The aim of the Mayor's ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework. Three key issues are: 1. Securing good noise reducing road surfaces 2. Securing a night aircraft ban across London 3. Reducing noise through better planning and design of new housing

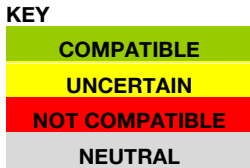
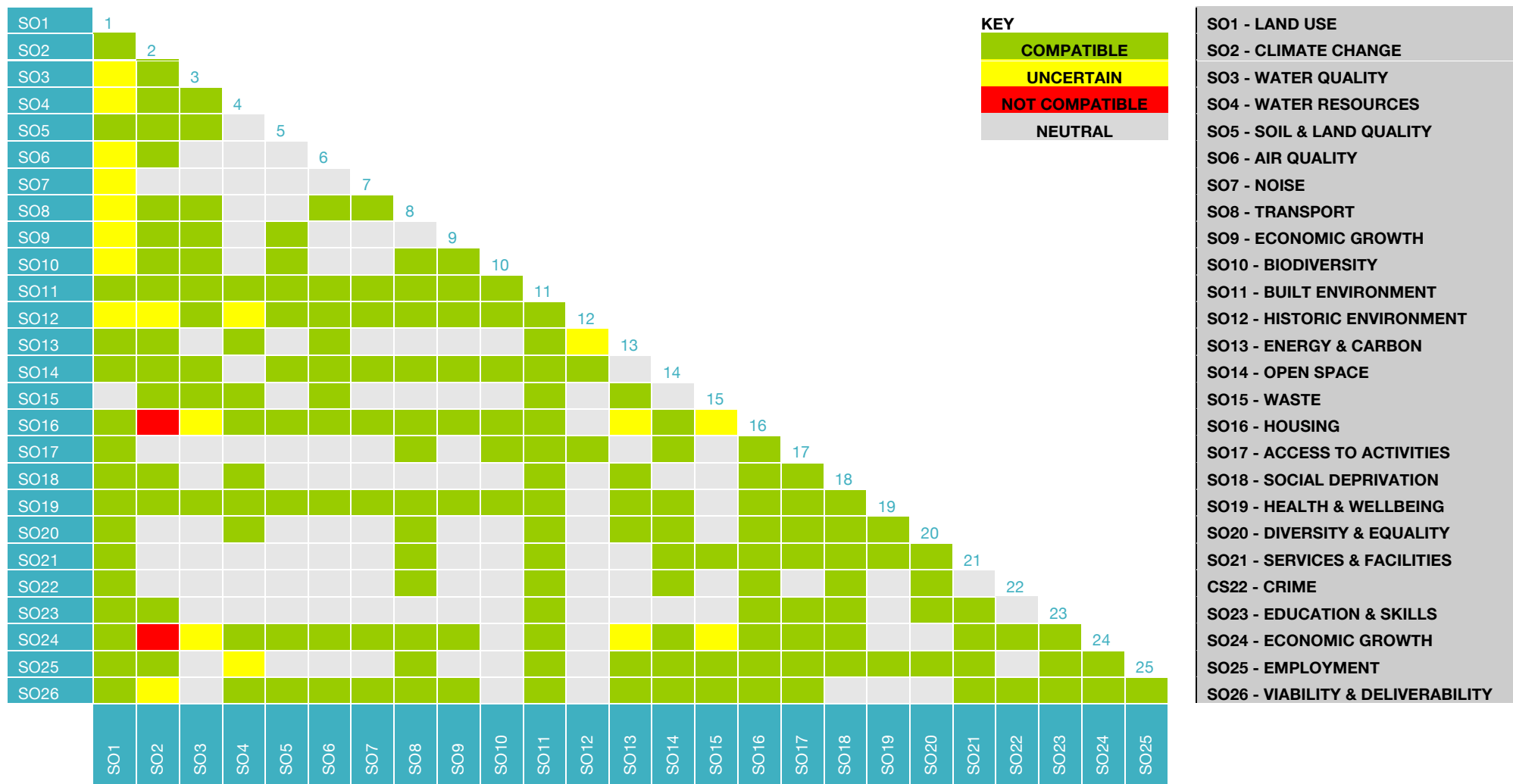
Regional	
Policy or Plan	Summary of objectives and targets
Open Space and Biodiversity	
London's Natural Signatures: The London Landscape Framework – Natural England 2011	The London Landscape Framework aims to support but also go beyond existing green space policy. The Natural Signatures are a means of encapsulating and evoking the key natural characteristics of the Natural Landscape Areas.
All London Green Grid March 2012	The All London Green Grid takes the principles of the East London Green Grid and applies them across London. <ul style="list-style-type: none"> • The concept of a “green grid” – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways – is at the centre of the London Plan’s approach to the provision, enhancement and management of green infrastructure (Policy 2.18). This network of spaces functions best when designed and managed as an interdependent ‘grid’. • The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support.
Shaping Neighbourhoods: Play and Informal Recreation SPG – 2012	The guidance supports the implementation of the London Plan Policy 3.6 on ‘Children and Young People’s Play and Informal Recreation Facilities,’ and other policies on shaping neighbourhoods (Chapter 7 of the London Plan), in particular Policy 7.1 on Lifetime Neighbourhoods.
Connecting with London’s Nature. The Mayor’s Biodiversity Strategy (2002)	The document details the Mayor’s vision for protecting and conserving London’s natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space. The strategy is an important step in establishing a London-wide framework for maintaining London’s diversity of wildlife.
Sustainability	
Sustainable Design and Construction SPG, 2014	This SPG provides guidance on the implementation of London Plan policy 5.3 – Sustainable Design and Construction, as well as a range of policies, primarily in Chapters 5 and 7 that deal with matters relating to environmental sustainability.
Transport	
Mayors Transport Strategy (2010)	The Mayor’s Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as part of a strategic policy framework to support and shape the economic and social development of London over the next 20 years. It sets out the Mayor’s transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision.
Transport Assessment Best Practice Guidance 2010	
A New Way to Plan – Travel Planning for new development in London 2010	

Regional	
Policy or Plan	Summary of objectives and targets
Waste	
Mayors Draft Replacement Municipal Waste Management Strategy (2010)	<p>The Strategy is made up of six key policy chapters, outlining where the Mayor thinks he can make most difference. The six overarching policies are:</p> <ul style="list-style-type: none"> • Inform producers and consumers of the value of reducing, reusing and recycling • Provide a greenhouse gas standard for municipal waste management activities to reduce their impact on climate change • Capture the economic benefits of waste management • Achieve 50 per cent municipal waste recycling or composting performance (including anaerobic digestion) by 2020 and 60 per cent by 2031 • Catalyse municipal waste infrastructure in London, particularly low-carbon technologies • Achieve a high level of street cleanliness.
Water	
Securing London's Water Future (2011)	<p>This is the first water strategy for London and provides a complete picture of the capital's water needs. The strategy calls for organisations involved in the city's water management to:</p> <ul style="list-style-type: none"> • invest in a water management and sewerage system to ensure London has the water services fit for a world class city and create jobs • support and encourage Londoners to take practical action to save water, save energy and save on their utility bills (a standard package of water saving measures can save a household around 35,000 litres of water per year and £90 off their bills) • realise the potential of London's sewage as a clean energy resource to help reduce greenhouse gas emissions and improve energy security • work in partnership with the Mayor, boroughs and communities to seek and develop opportunities to manage flood risk through enhancing London's green spaces. <p>At the heart of the strategy is a six-point plan to reduce London's water demand. At a time of decreasing supply and increasing demand for water, it makes sense to use the water we have more wisely. The strategy promotes increasing water efficiency and reducing water wastage to balance supply and demand for water, safeguard the environment and help tackle water affordability problems.</p>
Taking Care of Water - Our Plan for the next 25 years (Thames Water Utilities 2007)	<p>Taking care of water describes a long-term strategy to address a series of issues. It is built around the four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the likely impact on bills.</p>
Water Resources Management Plan (Thames Water Utilities) 2010-2035	<p>Sets out how demand for water is balanced against the supply over the next 25-year period.</p>
Our Plans for Water (Thames Water Utilities) 2010-2015	<p>A five-year Plan, which sets out proposals to maintain and improve services during the period 2010 to 2015.</p>

Local
Policy or Plan
Community
Community Plan 2014
Merton's Cultural Strategy - A Better Future for All 2007-10
Economy
Employment Land Study 2010
Merton's Economic Development Strategy 2010 and Refresh 2012
Merton's Employment and Skills Action Plan 2013-14
Education
Site options for a new Secondary School - Capita Symonds 2013
Energy and Climate Change
Climate Change Strategy 2009-2015
Carbon Assessment of Domestic Housing in London Borough of Merton 2010
Merton Climate Change Research: Town Centre Morden: CHP Plant Option Appraisal 2010
Merton Climate Change: Renewable Energy Resources in Merton - A Preliminary Assessment 2009
Environment
Nature Reserve Management Plans (13 in total) 1997-2007
Thames Landscape Strategy 2012
Flood Risk
London Boroughs of Wandsworth, Merton, Sutton and Croydon Strategic Flood Risk Assessment (Level 1 and 2) 2008 and 2009 (update due December 2016/January 2017)
Local Flood Risk Management Strategy 2014
Preliminary flood Risk Assessment 2011
Health
Merton Sport, Health and Physical Activity Strategy
Merton's Healthier Communities Strategy 2008-12
Joint Strategic Needs Assessment 2014/15
Childcare sufficiency in Merton Annual report 2013
Heritage and Archaeology
Merton's Conservation Area Character Assessments
Borough Character Study 2014

Housing
Housing Strategy 2012 -15
Tenancy Strategy 2013
Merton's Older Person Housing Strategy 2008-12
Merton's Neighbourhood Renewal Strategy 2005-10
Affordable Housing Viability Study 2010
Strategic Housing Market Assessment 2010
Infrastructure
Infrastructure Projects (table 27.2 Core Planning Strategy)
Infrastructure Needs Assessment Study 2008
Open Space and Biodiversity
Merton's Public Realm Strategy 2009
Merton's Allotment Strategy 2007-10
Borough's Sport, Open Space and Recreation Needs Assessment
Merton's Open Space Strategy 2010
Merton's Free Play Strategy 2007-2012
Wandle Valley Regional Park: A vision for the future update 2009
Planning
Core Planning Strategy 2011
Sites and Policies Plan 2014
Policies Map 2014
Pollution
Air Quality Action Plan Progress Report 2014
Contaminated Land Strategy 2005
Transport
Local Implementation Plan for Transport 2011-2031
Waste
South London Waste Plan DPD 2012

A3 Compatibility Matrix of Sustainability Objectives



- SO1 - LAND USE
- SO2 - CLIMATE CHANGE
- SO3 - WATER QUALITY
- SO4 - WATER RESOURCES
- SO5 - SOIL & LAND QUALITY
- SO6 - AIR QUALITY
- SO7 - NOISE
- SO8 - TRANSPORT
- SO9 - ECONOMIC GROWTH
- 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 & EQUALITIES
- SO21 - SERVICES & FACILITIES
- CS22 - CRIME
- SO23 - EDUCATION & SKILLS
- SO24 - ECONOMIC GROWTH
- SO25 - EMPLOYMENT
- SO26 - VIABILITY & DELIVERABILITY

Compatibility Assessment Results

KEY

	compatible
	uncertain
	not compatible
	no link

The colour coding above provides a clear overview of the relationship of the Sustainability Objectives. It is an important strategic exercise to ensure that the overarching Objectives are not at odds with one another.

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.

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

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

- SO16 Housing

SO24 Economic Growth

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

A4 Assessment of Estates Local Plan Objectives

Estates Local Plan Objectives

The ELP Objectives listed below have been assessed against the Sustainability Objectives to check that they are compatible.

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.

Compatibility Assessment of Plan Objectives

Sustainability Objectives		ELP Objectives							
		1	2	3	4	5	6	7	8
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								

Sustainability Objectives		ELP Objectives							
		1	2	3	4	5	6	7	8
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								

Results of Compatibility Assessment of Plan Objectives

The assessment shows that the ELP objectives are largely compatible. Two areas of potential incompatibility are shown 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 objectives.

However, mitigation of the potential negative impacts of new development should be considered in the SA of the options and policies and through the design and approach to development, which will be managed by the development management policies, in both the Core Planning Strategy and Sites and Policies Plan.

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 and for suitable mitigation measures to be identified during the SA process.

A5 Assessment of Estates Local Plan Options

The options that have been assessed are as set out in the Case for Regeneration prepared by Savills, September 2015 on behalf of Circle Housing Merton Priory:

Eastfields Option 1 (EO1): Refurbishment to Decent Homes (Merton Standard)

Eastfields Option 2 (EO2): Refurbishment to Enhanced Standard

Eastfields Option 3 (EO3): Full Redevelopment

High Path Option 1 (HP1): Refurbishment to Decent Homes (Merton Standard)

High Path Option 2 (HP2): Refurbishment to Enhanced Standard







High Path Option 3 (HP3): Full Redevelopment

Ravensbury Option 1 (RO1): Refurbishment to Decent Homes (Merton Standard)

Ravensbury Option 2 (RO2): Refurbishment to Enhanced Standard

Ravensbury Option 3 (RO3): Partial Redevelopment

KEY

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

Summary Results of Estates Local Plan 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	Yellow	Grey	Grey	Yellow	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	Green	Grey	Yellow	Grey	Grey	Yellow
SO13	ENERGY & CARBON	Orange	Green	Green	Grey	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

Detailed SA Results of Estates Local Plan Options

Sustainability Objectives		EASTFIELDS OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.	Orange	Orange	Orange	Red	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. The impact is therefore expected to increase over time as the pressure for housing increases.
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.	Orange	Green	Orange	Orange	The proposed improvements to the properties are predominantly for internal works. The Energy and Sustainability Report prepared by MLM Consulting November 2014 addresses the current condition of the stock, which finds the properties are 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 CO ₂ emissions for the long term.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.	Grey	Grey	Grey	Grey	No significant impact - internal works only
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.	Green	Green	Green	Green	Improvements to fixtures and fittings in bathrooms and kitchens should ensure that water consumption is reduced, although the incorporation of water saving measures may be limited by the current design.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.	Grey	Grey	Grey	Grey	No significant impact - internal works only
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.	Grey	Grey	Grey	Grey	No significant impact - internal works only
SO7	NOISE To improve amenity by minimising the impact associated with noise.	Yellow	Yellow	Grey	Grey	The improvement works may have a minor negative impact in the short term, however suitable mitigation measures such as hours of work should minimise likely disruption
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.	Grey	Grey	Grey	Grey	No significant impact - internal works only
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.	Grey	Grey	Grey	Grey	No significant impact - internal works only
SO10	BIODIVERSITY To protect and enhance biodiversity.	Grey	Grey	Grey	Grey	No significant impact - internal works only

Sustainability Objectives		EASTFIELDS OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
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					No significant impact - internal works only
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact - internal works only
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The proposed improvements to the properties are predominantly for internal works. The Energy and Sustainability Report prepared by MLM Consulting November 2014 addresses the current condition of the stock, which finds the properties are 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 significant measures to be introduced that will reduce CO ₂ emissions for the long term
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact - internal works only
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.					No significant impact - internal works only
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Although the refurbishment of the current homes will increase the number of homes meeting decent homes standards, it will not enable an increase in the quantity or type 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 homes. The negative impact is therefore expected to increase over time as the pressure for housing increases.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact - internal works only
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty levels, particularly fuel poverty. The improvements will have a shorter life span than new build.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The improvements to the properties are likely to improve the health and general well-being of residents as a result of more efficient, warmer, well maintained homes. Any disruption from the refurbishment works is likely to be short term. An asbestos survey will be required before any work is carried out as it is considered likely that there may be asbestos in the current structure. (See Baily Garner Condition Survey Report 2014)

Sustainability Objectives		EASTFIELDS OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact - internal works only
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact - internal works only
SO22	CRIME To reduce crime and the fear of crime.					No significant impact - internal works only
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact - internal works only
SO24	ECONOMIC GROWTH To support economic growth and business development					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area. The level of impact is uncertain
SO25	EMPLOYMENT To increase local employment and skills					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs. The level of impact is uncertain
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Financial modelling has been carried out over a 50year period. 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.

Eastfields Option 1 Summary:

Positive Impacts: Option 1 is likely to have a positive impact in relation to the following objectives **SO 4 Water, SO 18 Social Deprivation and SO19 Health and Wellbeing** as the internal improvements to the properties will improve the efficiency and performance of the properties, which will have a positive impact on the health and well being of residents.

Uncertain Impacts:, Uncertain impacts are identified for **SO7 Noise, SO24 Economic Growth and SO25 Employment**. The improvement works may have a minor negative impact in the short term, 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.

Negative Impacts: Negative impacts are identified for **SO1 Land use, SO2 Climate Change, SO13 Energy and Carbon, SO16 Housing, and SO26 Viability & Deliverability**. 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. The proposed improvements to the properties are predominantly for internal works. 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.

Sustainability Objectives		EASTFIELDS OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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. The impact is therefore expected to increase over time as the pressure for housing increases.
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.					The proposed improvements to the properties are for internal and external works. The Energy and Sustainability Report prepared by MLM Consulting November 2014 addresses the current condition of the stock, which finds the properties are significantly below Building Regulations and Decent Home Standards. Whilst there is likely to be a positive impact in the short to medium term, the improvements will not enable climate mitigation and adaptation measures to be introduced that will reduce CO ₂ emissions for the long term.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact - works only to existing buildings
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					Improvements to fixtures and fittings in bathrooms and kitchens should ensure that water consumption is reduced, although the incorporation of water saving measures may be limited by the current design.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact - works only to existing buildings
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact - works only to existing buildings
SO7	NOISE To improve amenity by minimising the impact associated with noise.					The improvement works may have a minor negative impact in the short term, however suitable mitigation measures, such as hours of work, should minimise likely disruption
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.					No significant impact - works only to existing buildings
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact - works only to existing buildings
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact - works only to existing buildings

Sustainability Objectives		EASTFIELDS OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
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					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. Refurbishment will not enable the wider setting of the estate to be improved.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact - works only to existing buildings
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The proposed improvements to the properties are for internal and external works. The Energy and Sustainability Report prepared by MLM Consulting November 2014 addresses the current condition of the stock, which finds the properties are significantly below Building Regulations and Decent Home Standards. Whilst there is likely to be a minor positive impact in the short - medium term, the improvements will not enable significant measures to be introduced that will reduce CO ₂ emissions for the long term
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact - works only to existing buildings
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.					No significant impact - works only to existing buildings
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Although the refurbishment of the current homes will increase the number of homes meeting decent homes standards, it will not enable an increase in the quantity or type 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 homes. The negative impact is therefore expected to increase over time as the pressure for housing increases.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact - works only to existing buildings
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty levels, particularly fuel poverty. The improvements will have a shorter life span than new build.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The improvements to the properties are likely to improve the health and general well-being of residents as a result of more efficient, warmer, well maintained homes. Any disruption from the refurbishment works is likely to be short term. An asbestos survey will be required before any work is carried out as it is considered likely that there may be asbestos in the current structure. (See Baily Garner Condition Survey Report 2014)

Sustainability Objectives		EASTFIELDS OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact - works only to existing buildings
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact - works only to existing buildings
SO22	CRIME To reduce crime and the fear of crime.					No significant impact - works only to existing buildings
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact - works only to existing buildings
SO24	ECONOMIC GROWTH To support economic growth and business development					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area. The level of impact is uncertain
SO25	EMPLOYMENT To increase local employment and skills					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs. The level of impact is uncertain
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					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

Eastfields Option 2 Summary:

Positive Impacts: Option 2 is likely to have a positive impact in relation to the following objectives **SO 4 Water, SO 18 Social Deprivation and SO19 Health and Wellbeing** as the internal improvements to the properties will improve the efficiency and performance of the properties, which will have a positive impact on the health and well being of residents. Any disruption from the refurbishment works is likely to be short term.

Uncertain Impacts: Uncertain impacts are identified for **SO11 Built Environment, SO24 Economic Growth and SO25 Employment**. 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. Refurbishment will also not enable the wider setting of the estate to be improved. 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.

Negative Impacts: Negative impacts are identified for **SO1 Land use, SO2 Climate Change, SO13 Energy and Carbon, SO16 Housing, and SO26 Viability & Deliverability**. 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. 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.

Sustainability Objectives		EASTFIELDS OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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.
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.					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 Energy and Sustainability Report prepared by MLM Consulting November 2014 addresses the current condition of the stock, which finds the properties are 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 CO ₂ emissions for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					A culverted watercourse at the eastern boundary of the estate offers the opportunity to create a swale. A swale here could help improve water quality acting as a filter, to help remove pollutants and suspended solids. In order to comply with the WFD there is a need to improve the biological and chemical status of the River Wandle to good by 2027. Further consideration of SuDS measures to be used will be needed.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					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 in relation to projected increases in population.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					A Geotechnical and Geoenvironmental Study was carried out by PBA in February 2014. Whilst the 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.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					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. Such impacts are likely to occur in the short to medium term and be of a temporary nature.
SO7	NOISE To improve amenity by minimising the impact associated with noise.					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. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term.
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.					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.

Sustainability Objectives		EASTFIELDS OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					PBA's Environmental Desk Study 2014 considers flood risk in relation to the estate. 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 and the introduction of SuDS to help mitigate against surface water flooding. 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.
SO10	BIODIVERSITY To protect and enhance biodiversity.					The site is adjacent to and incorporates a large volume of open space, generally of good quality, including mature trees. Landscape within the estate is in need of improved maintenance. 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.
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					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, design layout, architecture, landscape and accessibility of the site.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The redevelopment of the site provides the opportunity to provide new energy efficient homes that will reduce carbon emissions and provide better quality and more efficient housing over the long term. The redevelopment also offers the potential to incorporate renewable energy, which should be considered through the detailed design and consideration of the energy hierarchy. However the increase in development will result in an increase in emissions.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The site is adjacent to and incorporates a large volume of open space, generally of good quality but with poor visibility, overlooking and access through the site. The redevelopment offers the opportunity to improve the quality of provision and enhance the accessibility through the site and to the wider area. Clarity on whether areas are public or private open space should be addressed and adequate facilities that meet a range of users needs incorporated.
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.					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.

Sustainability Objectives		EASTFIELDS OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					The estate currently comprises 466 dwellings. The redevelopment will enable the provision of up to 700 new high quality, energy efficient homes, which will help meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The existing housing does not meet current space standards or building regulations, which would be addressed through the new build. The redevelopment would also enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					A new community/commercial space of c.1,000 sqm would be provided as part of the redevelopment to help to meet the needs of the estate and neighbouring properties. Improvements to accessibility within the estate and to the wider area should also be incorporated. Funds from S106/CIL could also be used to fund improvements to existing or new social infrastructure provision.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty and deprivation levels, particularly fuel poverty. The redevelopment will enable a higher standard of energy efficiency and thermal performance to be achieved, with a longer life span.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					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. (See Baily Garner Condition Survey Report 2014)
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					The redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need. 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.
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					The opportunity for a new layout that the redevelopment provides should ensure that accessibility to and within the site is improved. PBA's Socio-Economic Analysis Report, July 2015 notes that 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.
SO22	CRIME To reduce crime and the fear of crime.					SMUD's Urban Design study, Feb 2015 found the estate currently experiences poor visibility and accessibility, resulting in areas where people are likely to feel unsafe. The redevelopment provides the opportunity to improve the layout and building design to reduce opportunities both for, and the fear of, crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					PBA's report on Socio-Economic Analysis concludes that the 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. Current capacity of schools is considered adequate.

Sustainability Objectives		EASTFIELDS OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
SO24	ECONOMIC GROWTH To support economic growth and business development					The redevelopment could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area.
SO25	EMPLOYMENT To increase local employment and skills					The redevelopment could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs.
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Financial modelling has been carried out over a 50year 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 being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A 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.

Eastfields Options 3 Summary:

Major Positive Impacts: Option 3 is likely to have a major positive impact in relation to the following objectives:

SO1 Land Use, SO11 Built Environment, SO14 Open Space, SO16 Housing, SO17 Access to Activities, SO18 Social Deprivation and SO22 Crime - 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, design layout, architecture, landscape and accessibility of the site.

Minor Positive Impacts:

SO5 Soil and Land Quality, SO10 Biodiversity, SO13 Energy and Carbon Reduction - The Geotechnical and Geoenvironmental 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 of the site provides the opportunity to provide new energy efficient homes that will reduce carbon emissions and provide better quality and more efficient housing over the long term. The redevelopment also offers the potential to incorporate renewable energy, which should be considered through the detailed design and consideration of the energy hierarchy, however, the increase in development will result in an increase in emissions.

SO20 Diversity and Equality, SO23 Education and Skills, SO24 Economic Growth and SO25 Employment - The redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need. The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.

Uncertain Impacts:

SO 3 Water Quality, SO4 Water Resources, SO9 Flood Risk - A culverted watercourse at the eastern boundary of the estate offers the opportunity to create a swale, which could help improve water quality acting as a filter to help remove pollutants and suspended solids. In order to comply with the WFD there is a need to improve the biological and chemical status of the River Wandle to good by 2027. Further consideration of SuDS measures to be used will be needed. 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 in relation to projected increases in population. The Site is within Flood Zone 1 (less than 0.1% annual probability) and has no recent historic record of flooding, however has a high risk of surface water flooding. The redevelopment of the site offers the opportunity to increase the density of the housing and the introduction of SuDS to help mitigate against surface water flooding. 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.

SO6 Air Quality, SO7 Noise - 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.

SO19 Health, SO21 Services and Facilities - The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents. An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in 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.

SO26 Viability & Deliverability - Financial modelling has been carried out over a 50year 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 being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A 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.

Negative Impacts:

SO2 Climate Change, SO8 Transport, SO15 Waste - 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 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.

Sustainability Objectives		HIGH PATH OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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. The impact is therefore expected to increase over time as the pressure for housing increases.
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.					The proposed improvements to the properties are predominantly for internal works. The Dwelling Condition Appraisal by PPS, Nov 2015 notes that many of the existing properties are considered to have a low thermal performance and are significantly below Building Regulations and Decent Home Standards. Whilst refurbishment is likely to achieve a minor positive impact in the short term, the improvements will not enable climate mitigation measures to be introduced that will reduce CO ₂ emissions and adaptation measures for the long term.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact - internal works only
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					Improvements to fixtures and fittings in bathrooms and kitchens should ensure that water consumption is reduced, although the incorporation of water saving measures may be limited by the current design.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact - internal works only
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact - internal works only
SO7	NOISE To improve amenity by minimising the impact associated with noise.					The improvement works may have a minor negative impact in the short term, however suitable mitigation measures such as hours of work should minimise likely disruption
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.					No significant impact - internal works only
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact - internal works only
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact - internal works only

Sustainability Objectives		HIGH PATH OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
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					No significant impact - internal works only
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact - internal works only
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The proposed improvements to the properties are predominantly for internal works. Detailed analysis of the energy performance improvements that could be achieved has not been carried out. However, PRP Environmental have considered the energy consumption and costs for two typical properties, which showed substantial savings could be achieved. Whilst there is likely to be a minor positive impact in the short term, the improvements will not enable significant measures to be introduced that will reduce CO ₂ emissions for the long term
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact - internal works only
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.					No significant impact - internal works only
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Although the refurbishment of the current homes will increase the number of homes meeting decent homes standards, it will not enable an increase in the quantity, type or mix of accommodation on the Estate to be realised. The estate currently suffers from overcrowding, which would not be addressed. Refurbishment will also not address the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The negative impact is therefore expected to increase over time as the pressure for housing increases.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact - internal works only

Sustainability Objectives		HIGH PATH OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty levels, particularly fuel poverty. The improvements will have a shorter life span than new build.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The improvements to the properties are likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well maintained homes. Any disruption from the refurbishment works is likely to be short term. An asbestos survey will be required before any work is carried out as it is considered likely that there may be asbestos in the current structure. (See PPS Dwelling Condition Assessment, Nov 2014)
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact - internal works only
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact - internal works only
SO22	CRIME To reduce crime and the fear of crime.					No significant impact - internal works only
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact - internal works only
SO24	ECONOMIC GROWTH To support economic growth and business development					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area. The level of impact is uncertain
SO25	EMPLOYMENT To increase local employment and skills					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs. The level of impact is uncertain
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					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

High Path Option 1 Summary:

Positive Impacts:

Option 1 is likely to have a positive impact in relation to the following objectives **SO 4 Water, SO 18 Social Deprivation and SO19 Health** and Wellbeing as the internal improvements to the properties will improve the efficiency and performance of the properties, which will have a positive impact on the health and well being of residents. Any disruption from the refurbishment works is likely to be short term.

Uncertain Impacts:

Uncertain impacts are identified for **SO7 Noise, SO24 Economic Growth and SO25 Employment**. The Improvement works may have a minor negative impact in the short term, 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.

Negative Impacts:

Negative impacts are identified for **SO1 Land use, SO2 Climate Change, SO13 Energy and Carbon, SO16 Housing, and SO26 Viability & Deliverability**. 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. The proposed improvements to the properties are predominantly for internal works. 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.

Sustainability Objectives		HIGH PATH OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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. The impact is therefore expected to increase over time as the pressure for housing increases.
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.					The proposed improvements to the properties are predominantly for internal works. The Dwelling Condition Appraisal by PPS, Nov 2015 notes that many of the existing properties are considered to have a low thermal performance and are significantly below Building Regulations and Decent Home Standards. Whilst refurbishment is likely to achieve a minor positive impact in the short term, the improvements will not enable climate mitigation measures to be introduced that will reduce CO ₂ emissions and adaptation measures for the long term.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact - works only to existing buildings
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					Improvements to fixtures and fittings in bathrooms and kitchens should ensure that water consumption is reduced, although the incorporation of water saving measures may be limited by the current design.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact - works only to existing buildings
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact - works only to existing buildings
SO7	NOISE To improve amenity by minimising the impact associated with noise.					The improvement works may have a minor negative impact in the short term, however suitable mitigation measures such as hours of work should minimise likely disruption
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.					No significant impact - works only to existing buildings
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact - works only to existing buildings
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact - works only to existing buildings

Sustainability Objectives		HIGH PATH OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
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					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. Refurbishment will not provide the opportunity for the wider setting of the estate to be improved.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact - works only to existing buildings
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The proposed improvements to the properties are for internal and external works. The Dwelling Condition Appraisal by PPS, November 2015 addresses the current condition of the stock, which finds the properties are significantly below Building Regulations, Decent Home Standards and National Space Standards. Whilst there is likely to be a minor positive impact in the short - medium term, the improvements will not enable significant measures to be introduced that will reduce CO ₂ emissions or improve efficiency for the long term
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact - works only to existing buildings
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.					No significant impact - works only to existing buildings
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Although the refurbishment of the current homes will increase the number of homes meeting decent homes standards, it will not enable an increase in the quantity, type or mix of accommodation on the Estate to be realised. The estate currently suffers from overcrowding, which would not be addressed. Refurbishment will also not address the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The negative impact is therefore expected to increase over time as the pressure for housing increases.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact - works only to existing buildings
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty levels, particularly fuel poverty. The improvements will have a shorter life span than new build.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The improvements to the properties are likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well maintained homes. Any disruption from the refurbishment works is likely to be short term. An asbestos survey will be required before any work is carried out as it is considered likely that there may be asbestos in the current structure. (See PPS Dwelling Condition Assessment, Nov 2014)

Sustainability Objectives		HIGH PATH OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact - works only to existing buildings
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact - works only to existing buildings
SO22	CRIME To reduce crime and the fear of crime.					No significant impact - works only to existing buildings
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact - works only to existing buildings
SO24	ECONOMIC GROWTH To support economic growth and business development					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area. The level of impact is uncertain
SO25	EMPLOYMENT To increase local employment and skills					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs. The level of impact is uncertain
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					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.

High Path Option 2 Summary:

Positive Impacts:

Option 2 is likely to have a positive impact in relation to the following objectives **SO 4 Water, SO 18 Social Deprivation and SO19 Health** and Wellbeing as the internal improvements to the properties will improve the efficiency and performance of the properties, which will have a positive impact on the health and well being of residents. Any disruption from the refurbishment works is likely to be short term.

Uncertain Impacts:

Uncertain impacts are identified for **SO11 Built Environment, SO24 Economic Growth and SO25 Employment**. 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. Refurbishment will not provide the opportunity for the wider setting of the estate to be improved. 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.

Negative Impacts:

Negative impacts are identified for **SO1 Land use, SO2 Climate Change, SO13 Energy and Carbon, SO16 Housing, and SO26 Viability & Deliverability**. 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. 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.

Sustainability Objectives		HIGH PATH OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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 would make more efficient use of the land, as well as offering significant improvements to South Wimbledon.
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.					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 Dwelling Condition Appraisal by PPS, November 2015 addresses the current condition of the stock, which finds the properties are significantly below Decent Home and National Space Standards. The redevelopment of the estate will enable climate mitigation measures to be introduced that will reduce CO ₂ emissions and adaptation measures for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties. Owing to the timescale of the development the full impact is not likely to be achieved until the long term.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					The site is predominantly Flood Zone 1 and is considered to have a low likelihood of flooding. The River Wandle lies approx. 180m to the east of the site boundary and Bunce's Ditch is to the South of Merantun Way. The proposed development is considered unlikely to result in water displacement. Safe escape and egress routes to and from the site would be available in the unlikely event of a flood. SuDS strategy would be developed to manage surface water runoff.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					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 planned upgrade works to the Crossness sewage treatment works will allow for a 6% increase in population by 2021. The need for additional capacity beyond this date will need to be considered.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					A Geotechnical and Geoenvironmental Study was carried out by PBA in February 2014. Whilst the 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.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					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. Such impacts are likely to occur in the short to medium term and be of a temporary nature.
SO7	NOISE To improve amenity by minimising the impact associated with noise.					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. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term.

Sustainability Objectives		HIGH PATH OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
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.					The estate currently has a PTAL rating of 4 (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.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					PBA's Environmental Desk Study 2014 considers the flood risk in relation to the estate. 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. Historic surface water flooding has occurred in and around the estate. The introduction of SuDS to help mitigate against surface water flooding and alleviate flows to the existing sewer network which is at capacity. 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.
SO10	BIODIVERSITY To protect and enhance biodiversity.					The estate contains relatively high levels of open space but often of a poor quality and with a poor relationship to the buildings. Most of the landscape is undifferentiated mown grass as well as a number of mature trees. The redevelopment offers the opportunity to improve the quality of the landscape and open space and provide opportunities for the protection and enhancement of biodiversity through measures such as green corridors, ecological enhancement and the use of green/brown roofs. The mature trees should be protected where possible.
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					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 and accessibility of the site. The estate is a highly visible development, which due to its poor urban design and architectural quality has a negative visual impact on the surroundings. The redevelopment provides the opportunity to redesign the block layout, remove dead frontages, improve the public realm and the quality and relationship of landscaped areas to the built environment within the estate and wider area.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					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.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The redevelopment of the site provides the opportunity to provide new energy efficient homes that will reduce carbon emissions and provide better quality and more efficient housing over the long term. The redevelopment also offers the potential to incorporate renewable energy, CHP and link to decentralised energy networks, which should be considered through the detailed design and consideration of the energy hierarchy. However the increase in development will result in an increase in emissions.

Sustainability Objectives		HIGH PATH OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The estate contains relatively high levels of open space but often of a poor quality and with a poor relationship to the buildings. Most of the landscape is undifferentiated mown grass as well as a number of mature trees. The redevelopment offers the opportunity to improve the quality of the landscape and open space. Clarity on whether areas are public or private open space should be addressed and adequate facilities that meet a range of users needs incorporated.
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.					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.
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					The estate currently comprises 608 dwellings in a mix of building types and tenures. The redevelopment will enable the provision of an increase in new high quality, energy efficient homes, which will help meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The existing housing does not meet decent home or current space standards, which would be addressed through the new build. The redevelopment would also enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					Non-residential floorspace of c.5,000 sqm would be provided as part of the redevelopment to help to meet the needs of the estate and neighbouring properties. Improvements to accessibility within the estate and to the wider area should also be incorporated. Funds from S106/CIL could also be used to fund improvements to existing or new social infrastructure provision.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty and deprivation levels, particularly fuel poverty and overcrowding. The redevelopment will enable a higher standard of energy efficiency and thermal performance to be achieved, with a longer life span.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					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. (See PPS Dwelling Condition Report, Nov 2014)
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					The redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need. Proudlock Associates Accessibility Audit, Oct 2014 identified issues regarding accessibility of both the car parking areas and building entrances. The redevelopment will offer the opportunity to improve accessibility and 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 improved accessibility within the estate and to the wider area will also help to promote community cohesion.

Sustainability Objectives		HIGH PATH OPTION 3: Full Redevelopment				Commentary
		3	S	M	L	
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					The redevelopment presents an opportunity to integrate the estate into the surrounding area and to potentially enhance the commercial/community space offered within South Wimbledon. The opportunity for a new layout should also ensure that accessibility to and within the site is improved. PBA's Socio-Economic Analysis Report, July 2015 notes that 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.
SO22	CRIME To reduce crime and the fear of crime.					SMUD's Urban Design study, Feb 2015 found the estate currently experiences poor integration and connectivity to the wider network for pedestrians, creating maze like routes where people are likely to feel unsafe. The redevelopment provides the opportunity to improve the internal spatial structure to reduce opportunities both for crime and the fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					PBA's report on Socio-Economic Analysis concludes that the 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. A new secondary school is also proposed adjacent to the High path estate, which can serve existing and new residents.
SO24	ECONOMIC GROWTH To support economic growth and business development					The redevelopment could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area. The incorporation of up to 5,000 sqm of non-residential floorspace could transform South Wimbledon as a place and destination, delivering benefits for the wider community.
SO25	EMPLOYMENT To increase local employment and skills					The redevelopment could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs.
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Financial modelling has been carried out over a 50year 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 being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A 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.

High Path Option 3 Summary:

Major Positive Impacts: Option 3 is likely to have a major positive impact in relation to the following objectives:

SO1 Land Use, SO11 Built Environment, SO14 Open Space, SO16 Housing, SO17 Access to Activities, SO18 Social Deprivation and SO22 Crime - 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 and accessibility of the site. The estate is a highly visible development, which due to its poor urban design and architectural quality has a negative visual impact on the surroundings. The redevelopment provides the opportunity to redesign the block layout, remove dead frontages, improve the public realm and the quality and relationship of landscaped areas to the built environment within the estate and wider area.

The redevelopment will enable the provision of an increase in homes, which will help meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The existing housing does not meet decent home or current space standards, which would be addressed through the new build. The redevelopment would also enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need. The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty and deprivation levels, particularly fuel poverty and overcrowding. The redevelopment provides the opportunity to improve the internal spatial structure to reduce opportunities both for crime, and the fear of crime.

Minor Positive Impacts:

SO5 Soil and Land Quality, SO10 Biodiversity SO13 Energy and Carbon Reduction- The Geotechnical and Geoenvironmental 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 offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards. The redevelopment also offers the potential to incorporate renewable energy, CHP and link to decentralised energy networks, which should be considered through the detailed design and consideration of the energy hierarchy, however the increase in development will result in an increase in emissions.

SO20 Diversity and Equality, SO23 Education and Skills, SO24 Economic Growth and SO25 Employment - The redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need. The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.

Uncertain Impacts:

SO 3 Water Quality, SO4 Water Resources, SO9 Flood Risk - 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 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 help alleviate flows to the existing sewer network, which is at capacity. 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.

SO6 Air Quality, SO7 Noise - 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.

SO8 Transport - The estate currently has a PTAL rating of 4 (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.

SO12 Historic Environment - 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.

SO19 Health, SO21 Services and Facilities - The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents. An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in 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.

SO26 Viability & Deliverability - Financial modelling has been carried out over a 50year 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 being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed. A garage site on the site offers the opportunity to build new housing, which could provide Phase 1 of the redevelopment and the opportunity for decanting of existing residents. Further information on the phasing and decanting will need to be considered as it becomes available.

Negative Impacts:

SO2 Climate Change, SO8 Transport, SO15 Waste - 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.

Sustainability Objectives		RAVENSBURY OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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. The impact is therefore expected to increase over time as the pressure for housing increases.
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.					The proposed improvements to the properties are predominantly for internal works. The study by HTA Architects, Nov 2014 considered the energy performance of the stock, which indicated that the majority of the stock have a middle to low energy performance. Whilst refurbishment is likely to achieve a minor positive impact in the short term, the improvements will not enable climate mitigation measures to be introduced that will reduce CO ₂ emissions and adaptation measures for the long term.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact - internal works only
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					Improvements to fixtures and fittings in bathrooms and kitchens should ensure that water consumption is reduced, although the incorporation of water saving measures may be limited by the current design.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact - internal works only
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact - internal works only
SO7	NOISE To improve amenity by minimising the impact associated with noise.					The improvement works may have a minor negative impact in the short term, however suitable mitigation measures such as hours of work should minimise likely disruption
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.					No significant impact - internal works only
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact - internal works only
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact - internal works only
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					No significant impact - internal works only

Sustainability Objectives		RAVENSBURY OPTION 1: Refurbishment to decent homes standard				
		1	S	M	L	Commentary
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact - internal works only
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The proposed improvements to the properties are predominantly for internal works. Detailed analysis of the energy performance improvements that could be achieved has not been carried out. HTA Architects has considered the energy consumption and costs for two typical properties, which showed substantial savings could be achieved, however, these measures would still leave the stock with significantly lower energy performance ratings when compared to a similar building built to current Building Regulations.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact - internal works only
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.					No significant impact - internal works only
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Although the refurbishment of the current homes will increase the number of homes meeting decent homes standards, it will not enable an increase in the quantity, type or mix of accommodation on the Estate to be realised. Improvement works will also not resolve the issue of the Orlit houses, which are of a defective type of construction. Refurbishment will also not address the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The negative impact is therefore expected to increase over time as the pressure for housing increases.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact - internal works only
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty levels, particularly fuel poverty. The improvements will have a shorter life span than new build.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The improvements to the properties are likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. Any disruption from the refurbishment works is likely to be short term. An asbestos survey by Pennington Choices Ltd, Sept. 2014 has identified that there is asbestos within the roof eaves of all the surveyed properties.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact - internal works only

Sustainability Objectives		RAVENSBURY OPTION 1: Refurbishment to decent homes standard				Commentary
		1	S	M	L	
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact - internal works only
SO22	CRIME To reduce crime and the fear of crime.					No significant impact - internal works only
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact - internal works only
SO24	ECONOMIC GROWTH To support economic growth and business development					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area. The level of impact is uncertain
SO25	EMPLOYMENT To increase local employment and skills					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs. The level of impact is uncertain
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					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

Ravensbury Option 1 Summary:

Positive Impacts:

Option 1 is likely to have a positive impact in relation to the following objectives **SO 4 Water, SO 18 Social Deprivation and SO19 Health** and Wellbeing as the internal improvements to the properties will improve the efficiency and performance of the properties, which will have a positive impact on the health and well-being of residents. Any disruption from the refurbishment works is likely to be short term.

Uncertain Impacts:

Uncertain impacts are identified for **SO7 Noise, SO24 Economic Growth and SO25 Employment**. The Improvement works may have The improvement works may have a minor negative impact in the short term, 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.

Negative Impacts:

Negative impacts are identified for **SO1 Land use, SO2 Climate Change, SO13 Energy and Carbon, SO16 Housing, and SO26 Viability & Deliverability**. 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. The proposed improvements to the properties are predominantly for internal works. 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.

Sustainability Objectives		RAVENSBURY OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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. The impact is therefore expected to increase over time as the pressure for housing increases.
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.					The proposed improvements to the properties are for internal and external works. The study by HTA Architects, Nov 2014 considered the energy performance of the stock, which indicated that the majority of the stock have a middle to low energy performance. Whilst refurbishment is likely to achieve a minor positive impact in the short term, the improvements will not enable climate mitigation measures to be introduced that will reduce CO ₂ emissions and adaptation measures for the long term.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact - works only to existing buildings
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					Improvements to fixtures and fittings in bathrooms and kitchens should ensure that water consumption is reduced, although the incorporation of water saving measures may be limited by the current design.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact - works only to existing buildings
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact - works only to existing buildings
SO7	NOISE To improve amenity by minimising the impact associated with noise.					The improvement works may have a minor negative impact in the short term, however suitable mitigation measures such as hours of work should minimise likely disruption
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.					No significant impact - works only to existing buildings
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact - works only to existing buildings
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact - works only to existing buildings

Sustainability Objectives		RAVENSBURY OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
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					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, layout or density to be improved or redesigned
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact - works only to existing buildings
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The proposed improvements to the properties are for internal and external works. Detailed analysis of the energy performance improvements that could be achieved has not been carried out. HTA Architects has considered the energy consumption and costs for two typical properties, which showed substantial savings could be achieved, however, these measures would still leave the stock with significantly lower energy performance ratings when compared to a similar building built to current Building Regulations.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact - works only to existing buildings
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.					No significant impact - works only to existing buildings
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Although the refurbishment of the current homes will increase the number of homes meeting decent homes standards, it will not enable an increase in the quantity, type or mix of accommodation on the Estate to be realised. Improvement works will also not resolve the issue of the Orlit houses, which are of a defective type of construction. Refurbishment will also not address the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The negative impact is therefore expected to increase over time as the pressure for housing increases.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact - works only to existing buildings
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty levels, particularly fuel poverty. The improvements will have a shorter life span than new build.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The improvements to the properties are likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. Any disruption from the refurbishment works is likely to be short term. An asbestos survey by Pennington Choices Ltd, Sept. 2014 has identified that there is asbestos within the roof eaves of all the surveyed properties.

Sustainability Objectives		RAVENSBURY OPTION 2: Refurbishment to enhanced standard				Commentary
		2	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact - works only to existing buildings
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact - works only to existing buildings
SO22	CRIME To reduce crime and the fear of crime.					No significant impact - works only to existing buildings
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact - works only to existing buildings
SO24	ECONOMIC GROWTH To support economic growth and business development					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area. The level of impact is uncertain
SO25	EMPLOYMENT To increase local employment and skills					The refurbishment works could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs. The level of impact is uncertain
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					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.

Ravensbury Option 2 Summary:

Positive Impacts:

Option 2 is likely to have a positive impact in relation to the following objectives **SO 4 Water**, **SO 18 Social Deprivation and SO19 Health** and Wellbeing as the internal improvements to the properties will improve the efficiency and performance of the properties, which will have a positive impact on the health and well being of residents. Any disruption from the refurbishment works is likely to be short term.

Uncertain Impacts:

Uncertain impacts are identified for **SO11 Built Environment**, **SO24 Economic Growth and SO25 Employment**. 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, layout or density 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.

Negative Impacts:

Negative impacts are identified for **SO1 Land use**, **SO2 Climate Change**, **SO13 Energy and Carbon**, **SO16 Housing**, and **SO26 Viability & Deliverability**. 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. 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.

Sustainability Objectives		RAVENSBURY OPTION 3: Partial Redevelopment				Commentary
		3	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					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.
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.					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. HTA Architects report 2014 assesses the current condition of the stock, particularly energy performance. The partial redevelopment and refurbishment of the estate will enable climate mitigation measures to be introduced that will reduce CO ₂ emissions and adaptation measures for the long term in the design and layout of the buildings, as well as fixtures, fittings and materials used in the properties.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					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. In order to comply with the WFD there is a need to improve the biological and chemical status of the River Wandle to good by 2027. Further consideration of SuDS measures to be used will be needed. A SuDS strategy would be developed to provide on site attenuation and manage surface water runoff.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					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 projected increase in population.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					A Geotechnical and Geoenvironmental Study was carried out by PBA in February 2014. The study identifies that there is a low likelihood for contamination within the majority of the estate rising to moderate in some areas, to be expected with brownfield land. The study does not identify any factors that should prevent the potential for redevelopment or onerous cost implications.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					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. Such impacts are likely to occur in the short to medium term and be of a temporary nature.
SO7	NOISE To improve amenity by minimising the impact associated with noise.					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. New buildings should provide a better level of noise insulation than the existing structures providing a positive impact for residents in the long term.
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.					The estate currently has a PTAL rating of 2 (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.

Sustainability Objectives		RAVENSBURY OPTION 3: Partial Redevelopment				Commentary
		3	S	M	L	
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					PBA 's Environment Desk Study, Feb 2014 considers the flood risk for the site. 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 need to be developed to provide on-site attenuation and manage surface water runoff. 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.
SO10	BIODIVERSITY To protect and enhance biodiversity.					The estate has an open and green character, with good access to wider areas of parkland and the green corridor of the River Wandle, with good sized private gardens. The redevelopment offers the opportunity to improve the quality of the landscape and open space and provide opportunities for the protection and enhancement of biodiversity through measures such as green corridors, ecological enhancement and the use of green/brown roofs. The mature trees should be protected where possible.
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					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, layout, landscape and accessibility of the site. The redevelopment provides the opportunity to replace the Orlit homes, improve the quality and layout of the built form, increase density, remove 'dead' areas, improve pedestrian areas and maximise the river frontage.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					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.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					HTA Architects report 2014 assesses the current condition of the stock, particularly energy performance. The partial redevelopment and refurbishment of the site provides the opportunity to provide new energy efficient homes that will reduce carbon emissions and provide better quality and more efficient housing over the long term. The redevelopment also offers the potential to incorporate renewable energy, which should be considered through the detailed design and consideration of the energy hierarchy. However the increase in development will result in an increase in emissions.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The estate contains relatively high levels of open space, which are well maintained and provide an attractive setting. The partial redevelopment offers the opportunity to improve the quality of the amenity space including greater natural surveillance and designated parking 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.					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.

Sustainability Objectives		RAVENSBURY OPTION 3: Partial Redevelopment				Commentary
		3	S	M	L	
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					The estate currently comprises 192 dwellings in a mix of building types and tenures. The redevelopment will enable an increase in the number of new high quality, energy efficient homes, which will help meet the needs for the Borough in terms of current housing needs and projected changes in population growth, particularly affordable homes. The existing housing does not meet decent home or current space standards, which would be addressed through the new build. The redevelopment would also enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					Improvements to accessibility within the estate and to the wider area should also be incorporated. Funds from S106/CIL could also be used to fund improvements to existing or new social infrastructure provision.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvements to the housing stock will result in more efficient homes, which will have a positive impact upon poverty and deprivation levels, particularly fuel poverty. The redevelopment will enable a higher standard of energy efficiency and thermal performance to be achieved, with a longer life span.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					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 by Pennington Choices Ltd, Sept. 2014 has identified that there is asbestos within the roof eaves of all the surveyed properties.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					The redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need. PBA Socio-Economic Report, July 2015 considers the partial redevelopment and refurbishment is likely to have a positive effect on socio-economic inequalities. The redevelopment will offer the opportunity to improve accessibility and 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 improved accessibility within the estate and to the wider area will also help to promote community cohesion.
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					The redevelopment presents an opportunity to integrate the estate into the surrounding area. The opportunity for a new layout should also ensure that accessibility to and within the site is improved. PBA's Socio-Economic Analysis Report, July 2015 notes that 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.
SO22	CRIME To reduce crime and the fear of crime.					SMUD's Urban Design study, March 2015 considers the regeneration provides the opportunity for better connections to be created to nearby focal points, whilst avoiding over-permeability, which could undermine the secluded feel and feeling of safety. 'Dead' areas with little surveillance could also be removed to improve crime and the fear of crime.

Sustainability Objectives		RAVENSBURY OPTION 3: Partial Redevelopment				Commentary
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SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					PBA's report on Socio-Economic Analysis, July 2015 concludes that the 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 site is currently well served for schools.
SO24	ECONOMIC GROWTH To support economic growth and business development					The redevelopment could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area.
SO25	EMPLOYMENT To increase local employment and skills					The redevelopment could provide an increase in jobs, particularly trades and services in the short term. Local businesses may also see an increase in trade as a result of an increase of people in the area, which could increase local jobs.
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Financial modelling has been carried out over a 50year 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 being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A 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.

Ravensbury Option 3 Summary:

Major Positive Impacts: Option 3 is likely to have a major positive impact in relation to the following objectives:

SO1 Land Use, SO11 Built Environment, , SO14 Open Space, SO16 Housing - 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, layout, landscape, accessibility and safety of the site with the provision of appropriate services and facilities.

Minor Positive Impacts:

SO5 Soil and Land Quality, SO10 Biodiversity, SO13 Energy and Carbon Reduction - The Geotechnical and Geoenvironmental 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 Site is within Flood Zone 1 (less than 0.1% annual probability) and has no recent historic record of 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 Strategic Flood Risk Assessment in accordance with the NPPF. 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 offers the opportunity to provide new modern, energy efficient, high quality homes that meet current decent home and space standards. The redevelopment also offers the potential to incorporate renewable energy, which should be considered through the detailed design and consideration of the energy hierarchy, however, the increase in development will result in an increase in emissions.

SO18 Social Deprivation, SO20 Diversity and Equality, SO22 Crime , SO23 Education and Skills, SO24 Economic Growth and SO25 Employment - The partial redevelopment would enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need. The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups. The provision of a new community space and improved accessibility within the estate and to the wider area will help to promote community cohesion. Redevelopment is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.

Uncertain Impacts:

SO 3 Water Quality, SO4 Water Resources, SO9 Flood Risk - 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 projected increase in population. 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 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.

SO6 Air Quality, SO7 Noise - 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.

SO12 Historic Environment - 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.

SO17 Access to Activities, SO19 Health, SO21 Services and Facilities - The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents. An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in 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.

SO26 Viability & Deliverability - 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 being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed, a garage site on the site offers the opportunity to build new housing, which could provide Phase 1 of the redevelopment and the opportunity for decanting of existing residents. Further information on the phasing and decanting will need to be considered as it becomes available.

Negative Impacts:

SO2 Climate Change, SO8 Transport, SO15 Waste - 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 2 (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 detailed design and Transport Assessment. 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.

A6 Estates Local Plan Policies

An assessment of each of the ELP Policies has been undertaken against each of the Sustainability Objectives and the results follow in section A7. For ease of reference, the full text of each of the ELP Policies is set out below including the amendments made since February 2016 in pink.

Eastfields Policies	Full Policy Wording
<p>EP E1: Townscape</p>	<p>a. Proposals should demonstrate a well defined building line fronting onto the combined East-West street. Buildings should provide continuity and enclosure along the route ensuring buildings address the street.</p> <p>b. This frontage should not present a fortress-like wall between the street and the estate beyond. Therefore this frontage should be broken at intervals by streets into the estate.</p> <p>c. Proposals should create a focal point in the estate. The most suitable location for this is at the intersection of the north-south and east-west streets.</p> <p>d. The massing and layout of proposals should enable visual connectivity from within the estate to the attractive surroundings of the playground and cemetery.</p>
<p>EP E2: Street Network</p>	<p>a. The three streets of Acacia Road, Mulholland Close and Clay Avenue should be combined into one continuous East-West street on as straight an alignment as possible.</p> <p>b. The estate layout should accommodate the potential for a new traditional street following the location of the existing footpath running in a straight alignment from Grove Road to form a junction with Mulholland Close. This new street should be continued clearly through the estate, creating a new North-South street to the boundary with the cemetery with uninterrupted views.</p> <p>c. A new street should be provided parallel to Hammond Avenue such that the backs of new housing on its west side can face the backs of the existing bungalows on Hammond Avenue.</p> <p>d. On the east side of the estate a new street should be created to face Long Bolstead Recreation Ground and the cemetery, in order to retain the visual and physical link between the estate and the recreation ground.</p> <p>e. To the south of the estate there is a wide expanse of under-utilised road space and parking. Here, the existing perimeter street of Clay Avenue should either:-</p> <ul style="list-style-type: none"> (i) be positioned closer to the estate boundary and lined with housing frontages overlooking the cemetery, the street being suitable as mews type street; or (ii) a new traditional street provided, set further north to enable new housing frontages to face north onto it, with backs facing the cemetery. This second option should also allow for North-South streets to penetrate this frontage and open up public views and potential future access into the cemetery.
<p>EP E3: Movement and Access</p>	<p>a. Vehicular access arrangements should not divide the estate into two. Proposals for the estate must investigate the feasibility of Acacia Road, Mulholland Avenue and Clay Avenue being combined into a single street with full vehicular access at both ends.</p> <p>b. Pedestrian and cycle access from the north should be improved by upgrading the existing footway/access running south from Grove Road towards Mulholland Close. The potential to widen this link into a proper street with carriageway and footways either side should also be explored.</p> <p>c. Internal north-south streets should penetrate to the site boundary with the cemetery in a number of places on the southern boundary.</p>
<p>EP E4: Land Use</p>	<p>a. The land use for the estate will remain predominantly residential with open space provision and with re-provision of existing non-residential uses and designated open space to meet relevant planning policies.</p>

Eastfields Policies	Full Policy Wording
<p>EP E5: Open Space</p>	<p>a. There must be equivalent or better re-provision of the area of designated open space at the boundary with the cemetery in terms of quantity and quality to a suitable location within the estate, with high quality landscaping and recreational uses.</p> <p>b. Suitably designed plays space(s) for all age groups need to be provided in accordance with the Mayor of London’s ‘Play and Informal Recreation’ supplementary planning guidance document (2012).</p> <p>c. As there are groups of large mature trees in the existing main open space, any new open space should incorporate these trees into it as key landscape feature.</p> <p>d. All new houses should have gardens that meet or exceed current space standards.</p>
<p>EP E6: Environmental Protection</p>	<p>a. The proposed development must aim to reduce post-development runoff rates as close to greenfield rates as reasonably possible.</p> <p>b. Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan drainage hierarchy as possible.</p> <p>c. Sustainable Drainage systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following benefits:</p> <ul style="list-style-type: none"> • Blends in an enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>d. The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development. Potential overland flow paths should be determined and appropriate solution proposed to minimise the impact of the development, for example by configuring road and building layouts to preserve existing flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p> <p>e. Proposals should seek to link existing and proposed open space in a unified landscape layout; this should include minor green corridors that will encourage species to move from the cemetery into or through the development.</p> <p>f. Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor’s Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.</p> <p>g. When preparing development proposals in accordance with Policy 5.3 of the London Plan, proposals should include suitable comparisons between existing and proposed developments in order to fully demonstrate the expected improvements. All new development proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure; and sustainable procurement of materials.</p> <p>h. Technological improvement in battery storage have started to provide a potential energy storage solution for use in connection to domestic solar PV systems. The use of on-site storage offers a potential technological solution that would increase on-site renewable energy consumption, reduce utility costs and provided in-situ demand-side management. Battery storage can therefore be considered to sit within the ‘be lean’ or middle level of the Mayor’s energy hierarchy. Domestic PV installations should therefore no be considered without exploring the potential for on-site energy storage. Carbon savings from the incorporation of appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero.</p> <p>i. Applicants must demonstrate how their plans contribute to improving air quality and provide evidence to demonstrate that passive ventilation strategies employed to prevent overheating not inadvertently expose residents to poor air quality or unacceptable levels of external noise.</p>

Eastfields Policies	Full Policy Wording
	<ul style="list-style-type: none"> j. New development must ensure the preservation, protection and enhancement of protected species and habitats within the site and on adjacent land such as Streatham Park Cemetery, and should demonstrate that the proposals would result in new biodiversity gains. k. Development proposals must be accompanied by a working method statement and construction logistics plan l. Development proposals should apply the waste hierarchy where waste is minimised, reused and recycled, and residual waste is disposed of sustainable in the right location using the most appropriate means.
<p>EP E7: Landscape</p>	<ul style="list-style-type: none"> a. Street tree planting should be a key feature of landscape strategy which links into proposed open space with significant trees, the recreation ground and the adjacent cemetery. b. Landscaping layouts must where practicable, form green links between open spaces and the public realm whilst framing visual links from the estate to the adjacent cemetery and recreation ground. c. There should be street tree planting on the combined East-West street of Acacia Road, Mulholland Close and Clay Avenue, including the retention of established trees as well as the planting of new trees. d. Additions to existing tree planting, must reinforce the linear nature of the East-West street. In addition tree planting should create a landscape buffer between new development and any traffic flow on the route. e. Tree species must be specified to mitigate against pollution and noise. Planting layout and species need to be considered to ensure an attractive street scene whilst taking care not to restrict light or cause overshadowing to adjacent buildings. f. Landscaping proposals must address the perimeter of the estate in a unified manner. Unattractive scrub particularly on Mulholland Close should be removed to improve the setting of established trees and visual links to the surrounding area. Mature trees around the estate should be retained and the boundary treatment enhanced. g. The estate currently has a group of established mature trees in the central green space. These trees should be retained and be used to inform the design of landscaping, for example to provide cues for the location of focal points.
<p>EP E8: Building Heights</p>	<ul style="list-style-type: none"> a. The majority of buildings across the estate must be of a height similar and harmonious to surrounding residential areas to contribute to achieving consistency with the surrounding character. Building heights must be based on a comprehensive townscape appraisal and visual assessment, which builds on the analysis included in this document. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area. b. Buildings taller than this may be considered appropriate to facilitate intensified use of the site. Taller buildings are most appropriately located towards the centre of site and must be informed by the existing mature trees. They should complement, rather than compete with the scale of this vegetation. c. Taller building may also be appropriate at the intersection of N-S & E-W streets and to a lesser extent along Acacia Road and Mulholland Close, to signify main routes into the estate and relate to St. Marks Academy. d. When viewed from outside the estate, taller buildings should not be seen to dominate the landscape or skyline.

High Path Policies	Full Policy Wording
<p>EP H1: Townscape</p>	<ul style="list-style-type: none"> a. A continuous building line fronting the street must be provided, punctuated by side streets into the estate, from Merton High Street, with buildings with entrances and windows facing the street (active frontages) and no blank walls or gable ends. b. Streets must be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove Road. c. The key entry points into the estate at either end of Pincott Road and Nelson Grove Road, are the most suitable locations for landmark buildings. Other suitable locations could be at the junction of High Path and Morden Road (low-key) and in the vicinity of the junction of Abbey Road and Merantun Way. d. A focal point or space must be provided that highlight the significance of the areas local history particularly its connection to Lord Nelson. e. The design and layout of the estate must be well integrated into the surrounding area. f. Discussions with TfL are required to understand how proposals for a tram from Morden Road Tram Stop to South Wimbledon underground station, including enabling infrastructure, can be incorporated as part of any alterations to Morden Road.
<p>EP H2: Street Network</p>	<ul style="list-style-type: none"> a. Nelson Grove Road and Pincott Road, provide appropriate basis for the design of the new street network and mus form the basis of the main routes into and out of the estate. Extension of Nelson Grove Road from Abbey Road in the east to Morden Road in the west will help provide an east to west link, with clear views along its whole length. b. The position of the historic street of High Path should be retained and the road should allow for improved accessibility from High Path to Nelson Gardens. The street should also respect the setting of St John's the Divine Church. c. Hayward Close, which complements the historic street pattern, with its attractive tree-lined character must be retained. d. Increased accessibility for pedestrians and cyclists must be designed into the street network. e. The existing level of vehicular links along Merton High Street must be retained. f. Future extensions of the north-south streets ending at High Path southwards towards Merantun High Street must be a possibility, subject to TfL's support.
<p>EP H3: Movement and Access</p>	<ul style="list-style-type: none"> a. The main vehicle routes within the estate are currently Pincott Road and Nelson Grove Road, which are located centrally within the estate. Their character and layout must resemble a traditional street and serve the needs of all users, without the need to provide separate or segregated facilities for cyclists. b. Streets in the estate must connect in an open and easy to understand way that encourages movement by pedestrians and cycles. All streets should be safe, attractive and sociable places designed so as to manage vehicle speeds. Where streets are closed to vehicles at one end they must not restrict the possibility of vehicular movement in the future. c. Proposals must include measures to reduce the physical barrier (severance) caused by Morden Road to east-west pedestrian and cycle movement to better link The Path and Milner Road with the estate. d. The pedestrian and cycle access from the south-east corner of the estate towards Abbey Mills and Merantun Way must be improved in quality, including better pedestrian facilities on the roundabout serving Abbey Mills, and reassessment of the siting of the existing pedestrian crossing by the River Wandle Bridge and its approach from Abbey Road. e. Parking must, in the first instance, be provided on-street & well integrated into the street design. Any additional parking required can be provided in parking courts or under landscaped podiums. f. Discussions will be required with TfL to demonstrate how any proposals for a Tralink extension can be incorporated as part of any development proposals.

High Path Policies	Full Policy Wording
<p>EP H4: Land Use</p>	<p>a. The primary land use for the site will be residential, to accord with the predominant land use of the existing site and surrounding area. Non-residential uses may be appropriate to support employment, community activities and street vibrancy.</p> <p>b. Densities should not be solely focused around figures, but must be assessed as a product of a range of relevant design, planning, social, environmental and management factors. Exceeding the current indicated density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.</p> <p>c. All new buildings must maximise the number of entrances and windows facing onto the street (active frontages) and for residential uses must provide well defined private space between the front of the building and the street (defensible space) e.g. for landscaping and the storage of bins etc.</p>
<p>EP H5: Open Space</p>	<p>a. Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with London Plan Policy 7.18 'Protecting Open Space and addressing Deficiency'.</p> <p>b. Suitably designed plays space(s) for all age groups need to be provided in accordance with the Mayor of London's 'Play and Informal Recreation' supplementary planning guidance document (2012).</p> <p>c. All new houses should have gardens that meet or exceed current space standards.</p>
<p>EP H6: Environmental Protection</p>	<p>a. Retention of the existing mature tree groups and street trees including the trees fronting Merton High Street east of the junction with Pincott Rd, should help to form the basis of new open spaces, a network of biodiversity enhancing green corridors across the estate and assist with managing air and noise pollution, slowing rainfall runoff and mitigating the urban heat island effect.</p> <p>b. Applicants must demonstrate how their plans contribute to improving air quality and provide evidence to demonstrate that passive ventilation strategies employed to prevent overheating not inadvertently expose residents to poor air quality or unacceptable levels of external noise.</p> <p>c. New street trees should be planted and maintained, particularly on Pincott Rd and Nelson Grove Road to form the basis of a green corridor network across the estate based on the existing avenue of Hayward Close. All new or altered tree pits should be considered as part of sustainable drainage systems.</p> <p>d. The proposed development must aim to reduce post-development runoff rates as close to greenfield rates as reasonably possible.</p> <p>e. Developments proposals must demonstrate how surface water runoff is being managed as high up the London Plan drainage hierarchy as possible.</p> <p>f. Sustainable Drainage systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following benefits:</p> <ul style="list-style-type: none"> • Blends in an enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>g. The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development. Potential overland flow paths should be determined and appropriate solutions proposed to minimise the impact of the development, for example by configuring road and building layouts to preserve existing flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p>

High Path Policies	Full Policy Wording
	<p>h. The feasibility of CHP and district heating must be investigated. As a minimum this should include:</p> <ul style="list-style-type: none"> (i) An assessment of the secondary heat sources within a 400 metre radius of the site boundary (e.g. river water heat recover from the Wandle, heat extraction from the London Underground). (ii) Evidence to demonstrate engagement with key stakeholders associated with the potential secondary heat sources such as transport for London and Environment Agency have been full engaged in the development of the feasibility. (iii) Consideration of air quality issues should include an investigation in to the potential benefits that a district heat network could deliver to the wider area through the connection to existing buildings or development sites outside of the High Path regeneration. (iv) Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor’s Energy Hierarchy, when compared to the existing buildings on the estate, outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites. (v) When preparing development proposals in accordance with Policy 5.3 of the London Plan, proposals should include suitable comparisons between existing and proposed developments in order to fully demonstrate the expected improvements. All new development proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure; and sustainable procurement of materials. <p>i. Technological improvement in battery storage have started to provide a potential energy storage solution for use in connection to domestic solar PV systems. The use of on-site storage offers a potential technological solution that would increase on-site renewable energy consumption, reduce utility costs and provided in-situ demand-side management. Battery storage can therefore be considered to sit within the ‘be lean’ or middle level of the Mayor’s energy hierarchy. Domestic PV installations should therefore no be considered without exploring the potential for on-site energy storage. Carbon savings from the incorporation of appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero.</p> <p>j. Development proposals must be accompanied by a working method statement and construction logistics plan</p> <p>k. Development proposals should apply the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainable in the right location using the most appropriate means.</p>
<p>EP H7: Landscape</p>	<p>a. Regarding the following specific tree groups:</p> <ul style="list-style-type: none"> (i) The existing mature tree groups fronting Merton High Street east of the junction with Pincott Road must be retained. The isolated trees to the west of Pincott Road must be retained and augmented with new planting. This is in order to retain and enhance the trees as a key linear landscape asset and to mitigate against local traffic pollution. (ii) The mature trees along Hayward Close must be retained and augmented with new tree planting along the whole length of the street. This is in order to strengthen the attractive ‘avenue’ character of this street (iii) The line of mature trees in the vicinity of the playground within the ‘Priory Close’ block must be retained (iv) The line of mature trees in the car park between the ‘Ryder House’ and ‘Hudson Court’ blocks must be retained (v) The mature trees in the playground to the north of the ‘Marsh Court’ block. (vi) The mature trees to the west and south of the ‘Merton Place’ block, and to the north of the ‘DeBurgh House’ block must be retained. <p>b. Landscaping must be a key feature in the provision of private space fronting houses and blocks of flats (defensible space). Frontages must be designed to incorporate where feasible soft landscaping, appropriate planting and permeable surfaces.</p> <p>c. Street trees must be located to enable the creation of well defined on-street parking spaces. This will soften the visual impact of vehicles and enhance the street.</p>

High Path Policies	Full Policy Wording
	<p>d. Landscaping in the public open spaces and communal gardens must be of the highest quality, accessible and meet the needs of the residents by complying with the relevant policy requirements.</p>
<p>EP H8: Building Heights</p>	<p>a. General building height: The existing estate suffers from a mix of discordant characters due to the wide variety in heights, styles and siting of the buildings. Redevelopment of the estate should create a consistent character that fits in harmoniously with the surrounding development. A consistency in building heights is important in achieving this. The prevailing height across the estate should be lower than the heights along Morden Road and Merantun Way, but marginally higher than heights in the more sensitive areas of High Path, Abbey Road, Rodney Place and Merton High Street.</p> <p>Building heights should be based on a comprehensive townscape appraisal and visual assessment, which builds on the analysis included in this document. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area.</p> <p>Taller buildings may be considered appropriate to facilitate intensified use of the site. Such buildings must be located appropriately and relate well to the surrounding context and public realm, particularly at street level.</p> <p>b. Merton High Street: Buildings fronting Merton High Street must be of a scale that relates well to the building heights on the north side. They must not result in a lop-sided feel to the street or create unacceptable shadowing or blocking of sunlight. They must contribute to ‘mending’ the high street and stitching the estate seamlessly back into the existing urban fabric.</p> <p>c. Morden Road: Land around the Tube station and Morden Road is the focus of activity and uses in the local area. The street is quite wide and taller buildings are beginning to be built along Morden Road. This is the most suitable location on the estate for the tallest buildings and cues must be taken from emerging buildings to guide what is appropriate. Along Morden Road a consistent height must be sought, which is complementary to creating a boulevard feel to the street.</p> <p>d. Abbey Road: Buildings on the west side of Abbey Road must relate well to the existing housing on the east side and newer flats on the west side. Building heights should help create a consistent feel to the street, integrate well visually with the existing housing and not create a lopsided feel to the street. It is likely these will be lower in height than the buildings in the main part of the site.</p> <p>e. High Path: High Path currently lacks a sense of enclosure as the buildings along it do not address the street. New development should rectify this. There is scope to reinforce the narrow enclosure and intimate feel of this street particularly from Morden Road to Pincott Road. Building heights along High Path must reflect its historic character as a narrow historic street and ensure that it sensitively takes account of the setting of St Johns the Divine Church.</p> <p>f. Merantun Way: Land outside the estate boundary fronting Merantun Way is suitable for taller buildings to promote the transformation of this road into a boulevard street. Appropriate heights here will depend on the dimensions of a redesigned street and the possibility of urbanised development on the south side of the road. Heights similar to those appropriate for Morden Road are likely to be appropriate here.</p> <p>g. Station Road, Abbey Road & Merantun Way: Where Station Road, Abbey Road and Merantun Way meet is a sensitive area as there are likely to be awkward shaped sites. The close proximity of Rodney Place and Merantun Way create a need to respect existing low-rise development as well as retaining the most of the potential for taller buildings fronting Merantun Way. Building heights in this area must particularly respect, and be sensitive to, these constraints and opportunities.</p>

Ravensbury Policies	Full Policy Wording
<p>EP R1: Townscape</p>	<p>a. Proposals will be expected to provide widening and landscape improvements into Ravensbury Park entrance adjacent to Ravensbury Mill a and clearer views into the park from Morden Road.</p> <p>b. The corner of the estate adjacent to Ravensbury Park will be expected to make an architectural statement, which sensitively addresses the park entrance, river and mill buildings.</p> <p>c. Proposals will be expected to reinforce the corner of the estate opposite the Surrey Arms Public House as a space and a place. Proposals should have a sensitive relationship to the pub, particularly in terms of massing and height.</p> <p>d. The setting around the entrance to Ravensbury Park must be improved and enhanced. The architecture and design of buildings should draw upon from the surrounding good quality townscape such as Ravensbury Mill, The Surrey Arms and White Cottage.</p> <p>e. Proposals must show how they utilise local history as a point of reference in the development of the scheme, for example drawing on the sites past associations with industrial water mills and the estate of Ravensbury Manor.</p>
<p>EP R2: Street Network</p>	<p>a. The historic street pattern of Ravensbury Grove must be retained as the main route into and out of the estate and the basis of an internal network of streets.</p> <p>b. Ravensbury Grove must be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.</p> <p>c. Hengelo Gardens must be retained and enhanced, particularly with respect to arrangement of car parking, general landscaping and the potential for flood attenuation measures.</p> <p>d. New proposals must include a network of streets that provide clear connections from Ravensbury Grove to Morden Road and views to Ravensbury Park.</p>
<p>EP R3: Movement and Access</p>	<p>a. Proposals must improve pedestrian routes across the estate and to nearby parks, bus and tram stops. Routes should be linked into the proposed/existing street network along active frontages or existing walking routes, which should be well surveyed. Entrances into the park must be carefully designed and located to ensure accessibility into the park without undermining safety and biodiversity.</p> <p>b. The relocation of the crossing point from Morden Hall Park to the estate to a position which allows for direct link to park route and new pedestrian and cycle route along Morden Road will be expected to be investigated. Proposals should create a clear legible route from Morden Hall Park to the entrance of Ravensbury Park.</p> <p>c. Improvements to cycle links along Morden Road will be expected to be investigated in order to create stronger links between Morden Hall Park and Ravensbury Park. Proposals should investigate the creation of a segregated cycle way along Morden Road, which feeds into Ravensbury Park from Morden Hall Park. Additions to the cycle network should be integrated into wider cycle network.</p> <p>d. The main route for vehicles into the estate is Ravensbury Grove. There is also scope to retain the existing slip road access off Morden Road as a secondary entrance into the site should this be required. Any new East-West links from the estate onto Morden Road must be clear and designed as traditional streets, irrespective of whether they are for vehicular use.</p>
<p>EP R4: Land Use</p>	<p>a. The predominant land use for this estate is to be retained as residential with the re-provision of the existing community room.</p> <p>b. Densities outputs should not be solely focussed around figures, but must be assessed as a product of a range of relevant design, planning, social, environmental and management factors. Exceeding the current indicated density ranges may be considered appropriate where proposals will create developments of exceptional urban design quality.</p>

Ravensbury Policies	Full Policy Wording
<p>EP R5: Open Space</p>	<p>a. The area of designated open space at the boundary with Ravensbury Park must be re-provided in terms of quantity and quality to a suitable location within the estate, with high quality landscaping and recreational uses.</p> <p>b. Proposals must retain and enhance the existing communal gardens on Hengelo Gardens and Ravensbury Grove. New landscaping should connect to, and complement these existing spaces.</p> <p>c. Suitably designed plays space(s) for all age groups need to be provided in accordance with the Mayor of London’s ‘Play and Informal Recreation’ supplementary planning guidance document (2012).</p> <p>d. All new houses and flats should have gardens or amenity space that meet or exceed current space standards.</p>
<p>EP R6: Environmental Protection</p>	<p>a. As the estate is in close proximity to the River Wandle, and modelled as at risk of fluvial flooding, development proposals will need to include appropriate flood mitigation measures for the site in accordance with national, regional and local planning policies, to ensure the development is safe and does not increase the risk of flooding elsewhere.</p> <p>b. The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible.</p> <p>c. Development proposals must demonstrate how surface water runoff is being managed as high up the London Plan drainage hierarchy as possible.</p> <p>d. Sustainable Drainage systems (SuDS) must be part of any major development proposals. Drainage and SuDS should be designed and implemented in ways that deliver other policy objectives for each of the following benefits:</p> <ul style="list-style-type: none"> • Blends in an enhances amenity, recreation and the public realm • Enhances biodiversity • Improves water quality and efficiency • Manages flood risk <p>e. The development must be made safe from flooding, without increasing flood risk elsewhere for the lifetime of the development. Potential overland flow paths should be determined and appropriate solutions proposed to minimise the impact of the development, for example by configuring road and building layouts to preserve existing flow paths and improve flood routing, whilst ensuring that flows are not diverted towards other properties elsewhere.</p> <p>f. Proposals should seek to create mini corridors which enhance biodiversity of the estate and create a link between the estate and the surrounding parkland and river corridor habitats.</p> <p>g. Development should not encroach on the river bank buffer zone, which should be managed for the enhancement of biodiversity along the river corridor and to allow maintenance access to the watercourse, where required.</p> <p>h. New development must ensure the preservation, protection and enhancement of protected species and habitats within the adjacent Ravensbury Park and should demonstrate that the proposals would result in net biodiversity gains.</p> <p>i. Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor’s Energy Hierarchy, when compared to the existing buildings on the estate, outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.</p> <p>j. When preparing development proposals in accordance with Policy 5.3 of the London Plan, proposals should include suitable comparisons between existing and proposed developments in order to fully demonstrate the expected improvements. All new development proposals should consider the following sustainable design and construction principles: avoidance of internal overheating; efficient use of natural resources (including water); minimising pollution; minimising waste; protection of biodiversity and green infrastructure; and sustainable procurement of materials.</p>

Ravensbury Policies	Full Policy Wording
	<ul style="list-style-type: none"> k. Technological improvement in battery storage have started to provide a potential energy storage solution for use in connection to domestic solar PV systems. The use of on-site storage offers a potential technological solution that would increase on-site renewable energy consumption, reduce utility costs and provided in-situ demand-side management. Battery storage can therefore be considered to sit within the 'be lean' or middle level of the Mayor's energy hierarchy. Domestic PV installations should therefore no be considered without exploring the potential for on-site energy storage. Carbon savings from the incorporation of appropriately sized battery storage can be calculated by assuming that distribution losses from battery connected solar PV systems are zero. l. Applicants must demonstrate how their plans contribute to improving air quality and provide evidence to demonstrate that passive ventilation strategies employed to prevent overheating not inadvertently expose residents to poor air quality or unacceptable levels of external noise. m. Development proposals must be accompanied by a working method statement and construction logistics plan n. Development proposals should apply the waste hierarchy where waste is minimised, re-used and recycled, and residual waste is disposed of sustainable in the right location using the most appropriate means.
<p>EP R7: Landscape</p>	<ul style="list-style-type: none"> a. Landscaping must be a prominent feature within the public realm and create strong links to the surrounding parkland context. Landscaping treatments should emphasize green links and the river crossing. b. The estate currently has a group of established mature trees to the north, along Morden Road, on Ravensbury Grove and Hengelo Gardens. These trees must be retained and be used to inform the design of landscape arrangements for example to provide cues for the location of focal points. c. Street tree planting and landscaping must be incorporated into streets whilst integrating with existing open space functionality, biodiversity enhancements and flood mitigation measures. d. Along Morden Road tree planting must be extended to wrap around the perimeter of the estate following the curvature of the road. Tree species should be specified to mitigate against pollution and noise. e. The significant widening and enhancement of the entrance to Ravensbury Park from Morden Road, will be expected to be an integral part of any development proposals for the site.
<p>EP R8: Building Heights</p>	<ul style="list-style-type: none"> a. General Building Height: Whilst there is a need to increase density, to do so too much would undermine the dominant landscape character of the area. Buildings heights must not compete with established mature trees which envelop the estate. Relatively open views from within the estate to the surrounding tree canopy are a defining characteristic of the estate and must be retained. To ensure this, taller buildings must be located around the edge of the estate and not extend higher than the existing Ravensbury Court flats. Building heights must be based on a comprehensive townscape appraisal and visual assessment, which builds on the analysis included in this document. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area. b. Core of the estate: Within the estate building heights must generally be lower than other parts of the estate around its edge. Heights should allow views to the surrounding established trees. c. Morden Road: Buildings along Morden Road must relate to the surrounding established tree canopy but not adversely affect views of it from the centre of the estate. Buildings here can be higher than the middle of the estate. d. Ravensbury Grove: Building heights along Ravensbury Grove must relate to the character and scale of existing buildings such as Ravensbury Court and the established trees. e. Ravensbury Garages: Building heights in the vicinity of Ravensbury garages must relate to the surrounding established tree canopy and to the scale of adjacent existing buildings.

A7 Assessment of Estates Local Plan Policies

Summary of Results - EASTFIELDS 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										

Summary of Results - HIGH PATH 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											

Summary of Results - RAVENSBURY Sustainability Objectives		RAVENSBURY POLICIES								POLICIES	
		R1	R2	R3	R4	R5	R6	R7	R8		
SO1	LAND USE									R1	Townscape
SO2	CLIMATE CHANGE									R2	Street Network
SO3	WATER QUALITY									R3	Movement & Access
SO4	WATER RESOURCES									R4	Land Use
SO5	SOIL & LAND QUALITY									R5	Open Space
SO6	AIR QUALITY									R6	Environ. Protection
SO7	NOISE									R7	Landscape
SO8	TRANSPORT									R8	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										

Detailed Results of Estates Local Plan Policies

Sustainability Objectives		EASTFIELDS EP E1: Townscape				Commentary
		E1	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Proposals will need to demonstrate a well defined building, fronting the East-West street, with an active frontage that enable a well connected neighbourhood
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					The massing and layout of the proposals should enable improvements to both visual and physical connectivity with the wider area.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		EASTFIELDS EP E1: Townscape				Commentary
		E1	S	M	L	
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					Proposals will need to demonstrate a well defined building, fronting the East-West street, with an active frontage that enable a well connected neighbourhood. Fortress type buildings should be avoided with the frontage broken at regular intervals into the estate. Proposals should include a focal point into the estate.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Views to landscaped areas, such as the playground and cemetery should be incorporated into the proposals.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The massing and layout of the proposals should enable improvements to both visual and physical connectivity with the wider area.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					No significant impact

Sustainability Objectives		EASTFIELDS EP E1: Townscape				Commentary
		E1	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					The massing and layout of the proposals should enable improvements to both visual and physical connectivity with the wider area, which should reduce crime and the fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Eastfields EP E1: Summary:

The Policy would have a major positive impact upon **SO11 Built Environment** and a minor positive impact for **SO1 Land Use, SO8 Transport, SO14 Open Space, So17 Access to Activities and SO22 Crime** as the policy seeks to improve the building form, massing and layout to the development to improve both visual and physical connectivity with the wider area

Sustainability Objectives		EASTFIELDS EPE2: Street Network				
		E2	S	M	L	Commentary
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The new street network should enable free movement around, into and out of the estate. The network should be designed as local streets rather than estate streets in order to improve integration with the surrounding area, although it is acknowledged that the road network and open space will be a limiting factor. The south of the estate offers a wide expanse of under-utilised road space and parking, which provides the opportunity for new streets which could open up public views and access to the cemetery.
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					The new street network should enable free movement around, into and out of the estate. The network should be designed as local streets rather than estate streets in order to improve integration with the surrounding area, although it is acknowledged that the road network and open space will be a limiting factor. The conversion of the footpath running from Grove Road to Acacia road to a new street will enable pedestrian and cycle links between the estate and the railway footbridge to be improved.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		EASTFIELDS EPE2: Street Network				Commentary
		E2	S	M	L	
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					The new street network should enable free movement around, into and out of the estate. The network should be designed as local streets rather than estate streets in order to improve integration with the surrounding area, although it is acknowledged that the road network and open space will be a limiting factor.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The new street network should enable free movement around, into and out of the estate. The network should be designed as local streets rather than estate streets in order to improve integration with the surrounding area, although it is acknowledged that the road network and open space will be a limiting factor. The south of the estate offers a wide expanse of under-utilised road space and parking, which provides the opportunity for new streets which could open up public views and access to the cemetery.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The new street network should enable free movement around, into and out of the estate. The network should be designed as local streets rather than estate streets in order to improve integration with the surrounding area, which should encourage residents to walk or cycle.

Sustainability Objectives		EASTFIELDS EPE2: Street Network				Commentary
		E2	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					The new street network should enable free movement around, into and out of the estate. The network should be designed as local streets rather than estate streets in order to improve integration with the surrounding area, which should reduce crime and the fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Eastfields EP E2 Summary:

The Policy would have a positive impact upon **SO1 Land Use, SO8 Transport, SO11 Built Environment, SO14 Open Space, SO19 Health and Wellbeing and SO22 Crime**. The new street network should enable free movement around, into and out of the estate. The network should be designed as local streets rather than estate streets in order to improve integration with the surrounding area, although it is acknowledged that the road network and open space will be a limiting factor. The conversion of the footpath running from Grove Road to Acacia road to a new street will enable pedestrian and cycle links between the estate and the railway footbridge to be improved.

Sustainability Objectives		EASTFIELDS EPE3: Movement & Access				Commentary
		E3	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider 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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider area, creating a more efficient less congested network. The pedestrian and cycle access should also be upgraded to improve access and safety.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		EASTFIELDS EPE3: Movement & Access				Commentary
		E3	S	M	L	
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					Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider area. The pedestrian and cycle access should also be upgraded to improve access and safety.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider area. The pedestrian and cycle access should also be upgraded to improve access and safety.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider area. The pedestrian and cycle access should also be upgraded to improve access and safety.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider area. The pedestrian and cycle access should also be upgraded to improve access and safety.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact

Sustainability Objectives		EASTFIELDS EPE3: Movement & Access				Commentary
		E3	S	M	L	
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					The pedestrian and cycle access should be upgraded to improve access and safety.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Eastfields EP E3 Summary:

The Policy would have a major positive impact upon **SO8 Transport**. Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider area, creating a more efficient less congested network. The pedestrian and cycle access should also be upgraded to improve access and safety.

The policy has a minor positive impact upon **SO1 Land Use, SO11 Built Environment, SO14 Open Space, SO17 Access to Activities, SO19 Health and Wellbeing, and SO22 Crime**. Vehicular access arrangements should not divide the estate in two and internal north-south streets should penetrate to the site boundary to improve movement throughout the site and connectivity to the wider area. The pedestrian and cycle access should also be upgraded to improve access and safety.

Sustainability Objectives		EASTFIELDS EPE4: Land use				Commentary
		E4	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The land use will remain predominantly as residential, however, the redevelopment of the site would allow the site to be optimised, providing a greater number of high quality homes with re-provision of non-residential uses and designated open space.
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.					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.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					Development will need to minimise pollution in line with DM EP4 Pollutants
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					The development will result in an increase in water consumption and wastewater infrastructure. Mitigation measures that minimise the impacts through sustainable design practices or other policies that will be used should be identified.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Development will need to minimise pollution in line with DM EP4 Pollutants
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Development will need to minimise pollution in line with DM EP4 Pollutants
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Development will need to minimise pollution in line with DM EP4 Pollutants
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.					The site has a PTAL rating of 2 (poor). Measures should be considered that will improve the connectivity of the site.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					Designated open space will need to be re-provided and the redevelopment will offer opportunities to enhance the landscape and biodiversity.

Sustainability Objectives		EASTFIELDS EPE4: Land use				Commentary
		E4	S	M	L	
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					The predominant land use will remain as residential to accord with the current land use and that of the surrounding area. Designated open space will need to be re-provided and the redevelopment will offer opportunities to enhance the landscape and biodiversity.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The development will result in an increase in energy and greenhouse gas emissions. Mitigation measures that minimise the impacts through sustainable design practices or other policies that will be used should be identified.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Designated open space will need to be re-provided and the redevelopment will offer opportunities to enhance the landscape and biodiversity.
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.					The development will result in an increase in waste. Mitigation measures that minimise the impacts through sustainable design practices or other policies that will be used should be identified.
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					The redevelopment of the site provides the opportunity to provide a greater number of houses including the choice and mix of housing types and tenures, including greater affordable housing.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The regeneration of the site may allow for access to activities be improved
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The redevelopment of the site provides the opportunity to provide a greater number of houses including the choice and mix of housing types and tenures, including greater affordable housing.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The redevelopment of the site will provide the opportunity for high quality efficient homes that meet decent home standards and improve the health and wellbeing of residents by providing an improved living environment.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					The redevelopment of the site provides the opportunity to provide a greater number of houses including the choice and mix of housing types and tenures, including greater affordable housing and housing for a broader mix of community groups.
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact

Sustainability Objectives		EASTFIELDS EPE4: Land Use				Commentary
		E4	S	M	L	
SO24	ECONOMIC GROWTH To support economic growth and business development					Major development opportunities will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development. A local deficiency in convenience retail provision to the east side of the estate could be addressed through the redevelopment
SO25	EMPLOYMENT To increase local employment and skills					Major development opportunities will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development.
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Financial modelling has been carried out over a 50year period. The redevelopment would involve a high level of up front costs but would deliver regeneration benefits that would last for the long term. The current modelling shows that the redevelopment is the most economic and deliverable option for the site. Further work on the modelling is being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed.

Eastfields EP E4 Summary:

Major Positive Impacts:

SO1 Land Use, SO16 Housing - The predominant use of the land will remain as residential, however, the redevelopment of the site would allow the site to be optimised, providing a greater number of high quality homes with re-provision of non-residential uses and designated open space. The redevelopment of the site provides the opportunity to provide a greater number of houses including the choice and mix of housing types and tenures, including greater affordable housing.

Minor Positive Impacts:

SO10 Biodiveristy, SO11 Built Environment, SO14 Open Space, SO18 Social Deprivation, SO19 Health and wellbeing, SO20 Diversity and Equality, SO24 Economic Growth, SO25 Employment - The predominant land use will remain as residential to accord with the current land use and that of the surrounding area. Designated open space will need to be re-provided and the redevelopment will offer opportunities to enhance the landscape and biodiversity. The redevelopment of the site provides the opportunity to provide a greater number of houses including the choice and mix of housing types and tenures, including greater affordable housing and housing for a broader mix of community groups. Major development opportunities will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development. A local deficiency in convenience retail provision to the east side of the estate could be addressed through the redevelopment

Uncertain Impacts:

SO3 Water Quality, SO4 Water Resources, SO5 Soil and Land Quality, SO6 Air Quality, SO7 Noise, SO17 Access to Activities, SO26 Viability and Deliverability - Development will need to minimise pollution in line with DM EP4 Pollutants. The regeneration of the site may allow for access to activities be improved. Financial modelling has been carried out over a 50year period. The redevelopment would involve a high level of up-front costs but would deliver regeneration benefits that would last for the long term. The current modelling shows that the redevelopment is the most economic and deliverable option for the site. Further work on the modelling is being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed.

Negative Impacts:

SO2 Climate Change, SO13 Energy and Carbon, SO15 Waste - Development will result in an increase in energy, greenhouse emissions and waste. Mitigation measures that minimise the impacts and enable suitable adaptation to be implemented through sustainable design and construction practices should be identified.

Sustainability Objectives		EASTFIELDS EP E5: Open Space				
		E5	S	M	L	Commentary
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Equivalent or better re-provision of the designated open space in terms of quality and quantity will be required, including suitably designed play spaces, the retention of the existing mature trees and gardens that meet current space standards.
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.					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 retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					The site is in Flood Zone 1 and is not considered likely to result in any flood water displacement. The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site. The de-culverting of a ditch to the eastern boundary also offers the potential for a swale to be introduced which would provide benefits for surface water runoff and biodiversity.
SO10	BIODIVERSITY To protect and enhance biodiversity.					The retention and improvement of the areas of open space will offer the potential to protect and enhance the biodiversity. The de-culverting of a ditch to the eastern boundary also offers the potential for a swale to be introduced, which would provide benefits for surface water runoff and biodiversity.

Sustainability Objectives		EASTFIELDS EP E5: Open Space				Commentary
		E5	S	M	L	
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					The retention and improvement of the areas of open space will provide the opportunity to improve the setting and amenity of the built environment
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The retention and improvement of the areas of open space provides the opportunity to include new and improved areas of amenity and play space
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The retention and improvement of the areas of open space including suitably designed spaces for play and recreation provides the opportunity for the inclusion of a variety of activities for social and leisure activities.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The retention and improvement of the areas of open space including suitably designed spaces for play and recreation provides the opportunity for the inclusion of a variety of activities for social and leisure activities, which may have benefits for the health and well-being of residents.

Sustainability Objectives		EASTFIELDS EP E5: Open Space				Commentary
		E5	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Eastfields EP E5 Summary:

Major Positive Impacts:

SO1 Land Use, SO 14 Open Space - Equivalent or better re-provision of the designated open space in terms of quality and quantity will be required, including suitably designed play spaces, the retention of the existing mature trees and gardens that meet current space standards.

Minor Positive Impacts:

SO3 Water Quality, SO5 Soil and Land Quality, SO10 Biodiversity, SO11 Built Environment, SO17 Access to Activities, SO19 Health and Wellbeing

The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site and to protect and enhance the biodiversity. The de-culverting of a ditch to the eastern boundary also offers the potential for a swale to be introduced, which would provide benefits for surface water runoff and biodiversity. The retention and improvement of the areas of open space including suitably designed spaces for play and recreation provides the opportunity for the inclusion of a variety of activities for social and leisure activities, which may have benefits for the health and well-being of residents.

Uncertain Impacts:

SO2 Climate Change, SO9 Flood Risk 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 site is in Flood Zone 1 and is not considered likely to result in any flood water displacement. The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site. The de-culverting of a ditch to the eastern boundary also offers the potential for a swale to be introduced, which would provide benefits for surface water runoff and biodiversity.

Sustainability Objectives		EASTFIELDS EP E6: Environmental Protection				
		E6	S	M	L	Commentary
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The primary use of the land will remain as residential, however, the redevelopment of the site would allow the site to be optimised, providing a greater number of high quality homes with re-provision of non-residential uses and designated open space.
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.					Development will result in an increase in greenhouse gas emissions. Development proposals will need to include appropriate flood mitigation measures and the inclusion of a SuDS strategy to reduce surface water runoff. Development will need to comply with London Plan 5.3 Sustainable Design and Construction and demonstrate energy efficiency improvements.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					The development must reduce post development runoff rates as close as to greenfield rates as reasonably possible and demonstrate how surface water runoff is being managed in line with the London Plan drainage hierarchy. Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy to reduce runoff.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					Development will need to comply with the London Plan policy 5.3 and sustainable design and construction principles, including the efficient use of water.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants. Applicants will need to demonstrate how their plans contribute to improving air quality and demonstrate that residents will not be exposed to poor air quality. A working method statement and construction logistic plan will be needed.
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants. Applicants will need to demonstrate how their plans do not expose residents to unacceptable levels of external noise. A working method statement and construction logistic plan will be needed.
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.					Development will need to provide a Transport Assessment and other relevant documents including Travel Plans and Construction Management Plans in accordance with TfL's best practice. Development will need to comply with DM EP4 pollutants. A working method statement and construction logistic plan will be needed.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy to reduce run-off. 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.
SO10	BIODIVERSITY To protect and enhance biodiversity.					Proposals should seek to link to existing and propose open space, including minor green corridors to encourage species movement. The SuDS strategy should also include measures to improve biodiversity. New development must ensure the protection, preservation and enhancement of protected species and habitats and demonstrate biodiversity gains.

Sustainability Objectives		EASTFIELDS EP E6: Environmental Protection				Commentary
		E6	S	M	L	
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					Proposals should seek to link existing and proposed open space in a unified layout. The development should provide a more open feel with better linked landscape and green spaces. New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					Development will result in an increase in energy consumption. Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's energy hierarchy when compared to existing buildings on the estate. Consideration should be given to the inclusion of battery storage in connection to domestic solar PV systems to reduce on-site renewable energy consumption, reduce utility costs and provide in-situ demand side management.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Proposals should seek to link existing and proposed open space in a unified layout. The development should provide a more open feel with better linked landscape and green spaces.
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.					The development will result in an increase in waste. Mitigation measures that minimise the impacts through sustainable design practices or other policies that will be used should be identified. Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants. A working method statement and construction logistic plan will be needed. Development proposals will also need to apply the waste hierarchy.
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact

Sustainability Objectives		EASTFIELDS EP E6: Environmental Protection				Commentary
		E6	S	M	L	
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					Proposals should seek to link existing and proposed open space in a unified layout. The development should provide a more open feel with better linked landscape and green spaces, which could reduce crime and the fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					The viability and deliverability of the proposed measures will need to be demonstrated.

Eastfields EP E6 Summary:

Minor Positive Impacts:

SO1 Land Use, SO9 Flood Risk, SO10 Biodiversity, SO14 Open Space

The predominant use of the land will remain as residential, however, the redevelopment of the site would allow the site to be optimised, providing a greater number of high quality homes with re-provision of non-residential uses and designated open space. Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. Proposals should seek to link to existing and proposed open space, including minor green corridors to encourage species movement. The SuDS strategy should also include measures to improve biodiversity. 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. Proposals should seek to link existing and proposed open space in a unified layout. The development should provide a more open feel with better linked landscape and green spaces.

Uncertain Impacts:

SO3 Water Quality, SO5 Soil and Land Quality, SO6 Air Quality, SO7 Noise, SO8 Transport, SO11 Built Environment, SO12 Historic Environment, SO19 Health and Wellbeing - Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants. Development proposals must aim to reduce post development runoff rates in line with London Plan drainage hierarchy. Proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. Proposals should seek to link existing and proposed open space in a unified layout. The development should provide a more open feel with better linked landscape and green spaces. New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy. Proposals should seek to link existing and proposed open space in a unified layout. The development should provide a more open feel with better linked landscape and green spaces, which could reduce crime and the fear of crime. The viability and deliverability of the proposed measures will need to be demonstrated.

Negative Impacts:

SO2 Climate Change, SO13 Energy and Carbon, SO15 Waste

The development will need to include appropriate flood mitigation measures and include a SuDS strategy to reduce surface water runoff. Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's energy hierarchy when compared to existing buildings on the estate. Consideration should be given to the inclusion of battery storage in connection to domestic solar PV systems to reduce on-site renewable energy consumption, reduce utility costs and provide in-situ demand side management. Development will result in an increase in greenhouse gas emissions, energy consumed and waste produced. Mitigation measures that minimise the impacts through sustainable design and construction practices will need to be identified.

Sustainability Objectives		EASTFIELDS EP E7: Landscape				Commentary
		E7	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Landscape layouts should form green links between open space and the public realm whilst framing visual links from the estate. Linking the landscape into the surrounding area should enable the development to integrate into the wider 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.					Tree species should be specified to mitigate against pollution
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Tree species should be specified to mitigate against pollution
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Tree species should be specified to mitigate against 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.					Tree planting should create a landscape buffer between new development and any traffic routes
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					Existing mature trees should be retained and used to inform the design of the landscape. The landscape should form green links between the open space and public realm.
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					The setting of the estate is defined largely by the surrounding large open spaces of Streatham Park Cemetery, Long Bolstead Recreation Ground and playing fields and open space of St Mark's Academy and Lonesome primary school. The landscape should form green links between the open space and public realm, whilst framing visual links.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact

Sustainability Objectives		EASTFIELDS EP E7: Landscape				Commentary
		E7	S	M	L	
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The setting of the estate is defined largely by the surrounding large open spaces of Streatham Park Cemetery, Long Bolstead Recreation Ground and playing fields and open space of St Mark's Academy and Lonesome primary school. The landscape should form green links between the open space and public realm, whilst framing visual links.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The landscape should form green links between the open space and public realm, whilst framing visual links.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The landscape should form green links between the open space and public realm, improving the health and wellbeing of residents
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact

Sustainability Objectives		EASTFIELDS EP E7: Landscape				
		E7	S	M	L	Commentary
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Eastfields EP E7 Summary:

Minor Positive Impacts:
SO1 Land Use, SO6 Air Quality, SO7 Noise, SO8 Transport, SO10 Biodiversity, SO11 Built Environment, SO14 Open Space, SO17 Access to Activities, SO19 Health and Wellbeing
 Landscape layouts should form green links between open space and the public realm whilst framing visual links from the estate. Linking the landscape into the surrounding area should enable the development to integrate into the wider area. The setting of the estate is defined largely by the surrounding large open spaces of Streatham Park Cemetery, Long Bolstead Recreation Ground and playing fields and open space of St Mark's Academy and Lonesome primary school. The landscape should form green links between the open space and public realm, whilst framing visual links.

Uncertain Impacts:
SO2 Climate Change - Tree species should be specified to mitigate against pollution

Sustainability Objectives		EASTFIELDS EP E8: Building Heights				Commentary
		E8	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Building heights should be based on a comprehensive townscape and visual assessment. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the 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.					Taller buildings must be carefully placed with regard to the impact on microclimate and overshadowing
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		EASTFIELDS EP E8: Building Heights				Commentary
		E8	S	M	L	
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					Building heights should be based on a comprehensive townscape and visual assessment. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area. Taller buildings must be carefully placed with regard to the impact on microclimate and overshadowing
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					Taller buildings must be carefully placed with regard to the impact on microclimate and overshadowing
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Taller buildings must be carefully placed with regard to the impact on microclimate and overshadowing
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Tall buildings may be considered appropriate to facilitate intensification of the site and enable the provision of a greater number of housing.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					No significant impact
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact

Sustainability Objectives		EASTFIELDS EP E8: Building Heights				Commentary
		E8	S	M	L	
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					The viability and deliverability of the proposals will need to be demonstrated

Eastfields EP E8 Summary:

Minor Positive Impacts:

SO1 Land Use, SO2 Climate Change, SO11 Built Environment, SO13 Energy and Carbon, SO14 Open Space - Building heights should be based on a comprehensive townscape and visual assessment. Any strategy for building heights should make a positive contribution to the existing townscape, character and local distinctiveness of the area. Taller buildings must be carefully placed with regard to the impact on microclimate and overshadowing

Uncertain Impacts:

Tall buildings may be considered appropriate to facilitate intensification of the site and enable the provision of a greater number of housing on the estate. The viability and deliverability of the proposals will need to be demonstrated

Sustainability Objectives		HIGH PATH EP H1: Townscape				Commentary
		H1	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The development should provide clear definition of private and public space and be well integrated into the surrounding area. Early engagement will be needed with TfL regarding the Tramlink extension proposals and how they will inform the development proposals for the site.
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					The development should provide clear definition of private and public space and be well integrated into the surrounding area. Early engagement will be needed with TfL regarding the Tramlink extension proposals and how they will inform the development proposals for the site.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		HIGH PATH EP H1: Townscape				Commentary
		H1	S	M	L	
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					The development should provide clear definition of private and public space and be well integrated into the surrounding area. Landmark buildings should be designed to be sympathetic to the surrounding building and spaces. Streets should be designed with clear unobstructed views. Early engagement will be needed with TfL regarding the Tramlink extension proposals and how they will inform the development proposals for the site.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					The design should include a space as a focal point highlighting the significance of the areas local history, particularly its connection to Lord Nelson.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The development should provide clear definition of private and public space and be well integrated into the surrounding area. The design should include a space as a focal point highlighting the significance of the areas local history, particularly its connection to Lord Nelson.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					Early engagement will be needed with TfL regarding the Tramlink extension proposals and how they will inform the development proposals for the site.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					No significant impact
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact

Sustainability Objectives		HIGH PATH EP H1: Townscape				Commentary
		H1	S	M	L	
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					Early engagement will be needed with TfL regarding the Tramlink extension proposals and how they will inform the development proposals for the site.
SO22	CRIME To reduce crime and the fear of crime.					The development should provide clear definition of private and public space and be well integrated into the surrounding area. Streets should be designed with clear unobstructed views, which reduce crime and fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

High Path EP H1 Summary:

The Policy has a minor positive impact for **SO1 Land Use, SO8 Transport, SO11 Built Environment, SO14 Open Space, SO17 Access to Activities, SO21 Services and Facilities, and SO22 Crime**. The development should provide clear definition of private and public space and be well integrated into the surrounding area. Landmark buildings should be designed to be sympathetic to the surrounding building and spaces. Streets should be designed with clear unobstructed views. Early engagement will be needed with TfL regarding the Tramlink extension proposals and how they will inform the development proposals for the site.

Sustainability Objectives		HIGH PATH EP H2: Street Network				Commentary
		H2	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Layouts should be designed to futureproof pedestrian access from South Wimbledon tube, should TfL support a second entrance to the tube station, and routes into out of the neighbourhood.
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					The design should increase accessibility for pedestrians and cyclists. The existing level of vehicular links along Merton High Street should be retained. Proposals should enable future extensions of north-south streets subject to TfL support.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		HIGH PATH EP H2: Street Network				Commentary
		H2	S	M	L	
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					Layouts should be designed to futureproof pedestrian access from South Wimbledon tube, should TfL support a second entrance to the tube station, and routes into out of the neighbourhood.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					The position of the historic street of High Path should be retained and allow for improved accessibility from High Path to Nelson Gardens. Hayward Close should also be retained, which complements the historic street pattern.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					Layouts should be designed to future proof pedestrian access from South Wimbledon tube, should TfL support a second entrance to the tube station, and routes into out of the neighbourhood.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					No significant impact

Sustainability Objectives		HIGH PATH EP H2: Street Network				Commentary
		H2	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					Layouts should be designed to futureproof pedestrian access from South Wimbledon tube, should TfL support a second entrance to the tube station, and routes into out of the neighbourhood.
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

High Path EP H2 Summary:

The Policy would have a positive impact upon **SO1 Land Use, SO8 Transport, SO11 Built Environment, SO12 Historic Environment, SO17 Access to Activities, SO21 Services and Facilities**. Layouts should be designed to future proof pedestrian access from South Wimbledon tube, should TfL support a second entrance to the tube station, and routes into out of the neighbourhood. The position of the historic street of High Path should be retained and allow for improved accessibility from High Path to Nelson Gardens. Hayward Close should also be retained, which complements the historic street pattern. The design should increase accessibility for pedestrians and cyclists. The existing level of vehicular links along Merton High Street should be retained. Proposals should enable future extensions of north-south streets subject to TfL support.

Sustainability Objectives		HIGH PATH EP H3: Movement & Access				Commentary
		H3	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Streets in the estate should connect in an open and legible way that encourages movement by pedestrians and cyclists. Discussions will be required with TfL to understand how any proposals for a tram link extension to South Wimbledon underground including a new tram terminus can be incorporated as part of any development proposals.
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					The improvements to pedestrian and cycle routes and the inclusion of the new tramlink could have a positive impact upon air quality
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					Streets in the estate should connect in an open and legible way that encourages movement by pedestrians and cyclists. Discussions will be required with TfL to understand how any proposals for a Tramlink extension can be incorporated as part of any development proposals, to address public transport capacity issues and to determine the exact requirements for transport infrastructure. The proposals will need to be subjected to appropriate traffic modelling. Parking will need to be compliant with parking standards.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		HIGH PATH EP H3: Movement & Access				Commentary
		H3	S	M	L	
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					Streets in the estate should connect in an open and legible way that encourages movement by pedestrians and cyclists. Discussions will be required with TfL to understand how any proposals for a tram link extension to South Wimbledon underground including a new tram terminus can be incorporated as part of any development proposals.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					Streets in the estate should connect in an open and legible way that encourages movement by pedestrians and cyclists. Discussions will be required with TfL to understand how any proposals for a tram link extension to South Wimbledon underground including a new tram terminus can be incorporated as part of any development proposals.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The provision of improved pedestrian and cycle routes may have a positive impact upon the health and wellbeing of residents.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					Streets in the estate should connect in an open and legible way that encourages movement by pedestrians and cyclists. Discussions will be required with TfL to understand how any proposals for a tram link extension to South Wimbledon underground including a new tram terminus can be incorporated as part of any development proposals.

Sustainability Objectives		HIGH PATH EP H3: Movement & Access				Commentary
		H3	S	M	L	
SO22	CRIME To reduce crime and the fear of crime.					Streets in the estate should connect in an open and legible way that encourages movement by pedestrians and cyclists and includes well designed on street parking, which may reduce crime and fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					Discussions will be required with TfL to understand how any proposals for a tram link extension to South Wimbledon underground including a new tram terminus can be incorporated as part of any development proposals, which could encourage economic growth and business development
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Discussions will be required with TfL to understand how any proposals for a Tramlink extension can be incorporated as part of any development proposals and whether it would be viable and deliverable.

High Path EP H3 Summary:

Minor Positive Impacts:

SO1 Land Use, SO6 Air Quality, SO8 Transport, SO11 Built Environment, SO17 Access to Activities, SO19 Health and Wellbeing, SO21 Services and Facilities, and SO22 Crime. Streets in the estate should connect in an open and legible way that encourages movement by pedestrians and cyclists.

Uncertain Impacts:

Discussions will be required with TfL to understand how any proposals for a Tramlink extension can be incorporated as part of any development proposals to address public transport capacity issues and to determine the exact requirements for transport infrastructure, including viability and deliverability. The proposals will need to be subjected to appropriate traffic modelling. Parking will need to comply with parking standards.

Sustainability Objectives		HIGH PATH EP H4: Land Use				Commentary
		H4	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The primary land use will be residential to reflect the existing land use and surrounding neighbourhood. Densities should be assessed in consideration with relevant, design, planning, social, environmental and management factors. Non-residential uses may also be appropriate.
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.					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.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					The development is likely to result in an increase in water consumption and wastewater. Mitigation measures that minimise the impacts through sustainable design practices or other policies should be identified.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
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.					The site has a PTAL rating of 4 (good) and is considered suitable for an increase in density in order of make more efficient use of land in accordance with the London Plan density matrix. Development proposals will need to address public transport capacity issues and to determine the exact requirements for transport infrastructure.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					The site is predominantly in Flood Zone 1, with part of the western end of the site in Flood Zone 2 and the river Wandle is approx. 180 m to the east of the boundary site. The introduction of open space may have the potential to attenuate surface water runoff. 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 Local Surface Water Management Plan.
SO10	BIODIVERSITY To protect and enhance biodiversity.					Development should provide the opportunity 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					The primary land use will be residential to reflect the existing land use and surrounding neighbourhood. Densities should be assessed in consideration with relevant, design, planning, social, environmental and management factors. Non-residential uses may also be appropriate.

Sustainability Objectives		HIGH PATH EP H4: Land Use				Commentary
		H4	S	M	L	
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					The primary land use will be residential to reflect the existing land use and surrounding neighbourhood. Densities should be assessed in consideration of relevant, design, planning, social, environmental and management factors, including the potential impact on the historic environment.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The development will result in an increase in energy and carbon emissions. Mitigation measures that minimise the impacts through sustainable design practices or other policies that will be used should be identified
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Development proposals will need to provide public open space to address the identified deficiency
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.					The development will result in an increase in waste. Mitigation measures that minimise the impacts through sustainable design practices or other policies that will be used should be identified
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					The redevelopment provides the opportunity to provide a greater number of houses including a suitable mix of housing types and tenures and affordable housing provision. Densities should be assessed in consideration of relevant, design, planning, social, environmental and management factors
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The redevelopment provides the opportunity to provide a greater number of houses including a suitable mix of housing types and tenures and affordable housing provision.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The redevelopment of the site will provide the opportunity for high quality efficient homes that meet decent home standards and improve the health and wellbeing of residents by providing an improved living environment
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					The redevelopment provides the opportunity to provide a greater number of houses including a suitable mix of housing types and tenures and affordable housing provision.
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact

Sustainability Objectives		HIGH PATH EP H4: Land Use				Commentary
		H4	S	M	L	
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					Major development proposals will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development. Non-residential uses may be considered appropriate.
SO25	EMPLOYMENT To increase local employment and skills					Major development proposals will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development.
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Financial modelling has been carried out over a 50year period. The redevelopment would involve a high level of up front costs but would deliver regeneration benefits that would last for the long term. The current modelling shows that the redevelopment is the most economic and deliverable option for the site. Further work on the modelling is being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed.

High Path EP H4 Summary:

Major Positive Impacts:

SO1 Land Use, SO16 Housing - The primary use of the land will remain as residential, however, the redevelopment of the site would allow the site to be optimised, providing a greater number of high quality homes with re-provision of non-residential uses and designated open space. The redevelopment of the site provides the opportunity to provide a greater number of houses at a higher density including the choice and mix of housing types and tenures, including greater affordable housing. Densities will need to be assessed in consideration of relevant, design, planning, social, environmental and management factors.

Minor Positive Impacts:

SO10 Biodiversity, SO11 Built Environment, SO18 Social Deprivation, SO19 Health and wellbeing, SO20 Diversity and Equality, SO24 Economic Growth, SO25 Employment - The predominant land use will remain as residential to accord with the current land use and that of the surrounding area. The redevelopment of the site provides the opportunity to provide a greater number of houses including the choice and mix of housing types and tenures, including greater affordable housing and housing for a broader mix of community groups. Major development proposals will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development. A local deficiency in convenience retail provision to the east side of the estate could be addressed through the redevelopment.

Uncertain Impacts:

SO3, Water Quality, SO4 Water Resources, SO5 Soil and Land Quality, SO6 Air Quality, SO7 Noise, SO8 Transport, SO9 Flood Risk, SO12 Historic Environment, SO14 Open Space, SO17 Access to Activities, SO26 Viability and Deliverability - The issues of pollution and the historic environment are not addressed. The site has a PTAL rating of 4 (good) and is considered suitable for an increase in density in order to make more efficient use of land in accordance with the London Plan density matrix. Development proposals will need to address public transport capacity issues and to determine the exact requirements for transport infrastructure. The site is predominantly in Flood Zone 2, with part of the western end of the site in Flood Zone 2 and the river Wandle is approx. 180 m to the east of the boundary site. 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 Local Surface Water Management Plan. The introduction of open space may have the potential to attenuate surface water runoff. Development proposals will need to provide public open space to address the identified deficiency and opportunities to enhance biodiversity. The regeneration of the site may allow for access to activities to be improved. Financial modelling has been carried out over a 50-year period. The redevelopment would involve a high level of up front costs but would deliver regeneration benefits that would last for the long term. The current modelling shows that the redevelopment is the most economic and deliverable option for the site. Further work on the modelling is being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed. The potential impact on the historic environment will also need to be considered.

Negative Impacts:

SO2 Climate Change, SO13 Energy and Carbon, SO15 Waste - Development will result in an increase in energy, greenhouse emissions and waste. Mitigation measures that minimise the impacts and enable suitable adaptation to be implemented through sustainable design and construction practices should be identified.

Sustainability Objectives		HIGH PATH EP H5: Open Space				Commentary
		H5	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with the London Plan and the Greenspace Information for Greater London. All new houses should have gardens that or exceed current space standards.
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.					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.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					The inclusion of new areas of open space could offer the potential to manage surface water runoff.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					The site is predominantly in Flood Zone 2, with part of the western end of the site in Flood Zone 2 and the river Wandle is approx. 180 m to the east of the boundary site. The introduction of open space may have the potential to attenuate surface water runoff.
SO10	BIODIVERSITY To protect and enhance biodiversity.					The introduction of new areas of open space will provide the opportunity to protect and enhance the biodiversity.

Sustainability Objectives		HIGH PATH EP H5: Open Space				Commentary
		H5	S	M	L	
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					Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with the London Plan and the Greenspace Information for Greater London. All new houses should have gardens that meet or exceed current space standards.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with the London Plan and the Greenspace Information for Greater London. All new houses should have gardens that or exceed current space standards.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The provision of new areas of open space including suitably designed spaces for informal recreation for all ages will provide the opportunity for the inclusion of a variety of activities for social and leisure activities.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The provision of new areas of open space including suitably designed spaces for informal recreation for all ages will provide the opportunity for the inclusion of a variety of activities for social and leisure activities, which may have benefits for the health and wellbeing of residents.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact

Sustainability Objectives		HIGH PATH EP H5: Open Space				Commentary
		H5	S	M	L	
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

High Path EP H5 Summary:

Major Positive Impacts:
SO1 Land Use, SO11 Built Environment, SO 14 Open Space - Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces in accordance with the London Plan and the Greenspace Information for Greater London. All new houses should have gardens that meet or exceed current space standards.

Minor Positive Impacts:
SO10 Biodiversity, SO11 Built Environment, SO17 Access to Activities, SO19 Health and Wellbeing
 The provision of new areas of open space including suitably designed spaces for informal recreation for all ages will provide the opportunity for the inclusion of a variety of activities for social and leisure activities. which may have benefits for biodiversity and the health and well-being of residents.

Uncertain Impacts:
SO2 Climate Change, SO3 Water Quality, SO5 Soil and Land Quality, SO9 Flood Risk, 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 site is predominantly in Flood Zone 2, with part of the western end of the site in Flood Zone 2 and the river Wandle is approx. 180 m to the east of the boundary site. The introduction of open space may have the potential to attenuate surface water runoff

Sustainability Objectives		HIGH PATH EP H6: Environmental Protection				Commentary
		H6	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The predominant land use will be residential to reflect the existing land use and surrounding neighbourhood. Non-residential uses may be considered to support employment and community activities. The early design of proposals should consider the opportunity to incorporate landscape and permeable surfaces, as well as the potential for green corridors. Limitations in relation to flood risk will also need to be considered.
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.					The development will need to include appropriate flood mitigation measures and include a SuDS strategy to reduce surface water runoff. The feasibility of CHP and district heating must be investigated. Development will result in an increase in greenhouse gas emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design and construction practices will need to be identified.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. An open section of Bunces Ditch (a designated main river) exists to the South of Merantum Way, which may have origins within the estate and will need to be fully investigated. Post-development runoff rates should be as close to greenfield rate as possible.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Development should include the consideration of air quality and the potential benefits that a district heat network could deliver to the wider area. Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants and include the consideration of 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.					Development will need to provide a Transport Assessment and other relevant documents including Travel Plans and Construction Management Plans in accordance with TfL's best practice. Development will need to comply with DM EP4 pollutants
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. An open section of Bunces Ditch (a designated main river) exists to the South of Merantum Way, which may have origins within the estate and will need to be fully investigated. The sites is within Flood Zones 1 and 2. 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. Post-development runoff rates should be as close to greenfield rate as possible.

Sustainability Objectives		HIGH PATH EP H6: Environmental Protection				Commentary
		H6	S	M	L	
SO10	BIODIVERSITY To protect and enhance biodiversity.					The early design proposals should consider the opportunity to incorporate landscape and permeable surfaces, as well as the potential for green corridors and the retention of existing mature trees, which may provide opportunities for the protection and enhancement of 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					The early design proposals should consider the opportunity to incorporate landscape and permeable surfaces, as well as the potential for green corridors and the retention of existing mature trees. New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					Development will need to consider the impact upon the Historic Environment and identify suitable mitigation measures.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's energy hierarchy when compared to existing buildings on the estate. Consideration should be given to the inclusion of battery storage in connection to domestic solar PV systems to reduce on-site renewable energy consumption, reduce utility costs and provide in-situ demand side management. The feasibility of CHP and district heating must be investigated.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Public and communal open spaces must contribute to the creation of an efficient system for SuDS and the enhancement of biodiversity
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.					Development will result in an increase in waste. Mitigation measures that minimise the impacts and enable suitable adaptation to be implemented through sustainable design and construction practices should be identified. Development proposals will need to be accompanied by a working method statement and construction logistics plan and should apply the waste hierarchy.
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Energy strategies will need to clearly demonstrate how the development delivers energy efficient improvements when compared to the existing buildings on the estate.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvement in energy efficiency of homes may help to reduce the level of fuel poverty amongst residents
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					Development will need to comply with London Plan policy 5.3 and DM EP4 pollutants. The improvements in the efficiency and quality of the homes may lead to improvements in the health and well-being of residents.

Sustainability Objectives		HIGH PATH EP H6: Environmental Protection				Commentary
		H6	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					The viability and deliverability of the proposed measures will need to be demonstrated.

High Path EP H6 Summary:

Minor Positive Impacts:

SO1 Land Use, SO10 Biodiversity, SO14 Open Space, SO16 Housing

The predominant land use will be residential to reflect the existing land use and surrounding neighbourhood. Non-residential uses may be considered to support employment and community activities. The early design of proposals should consider the opportunity to incorporate landscape and permeable surfaces, as well as the potential for green corridors. Limitations in relation to flood risk will, however, need to be considered. Energy strategies will need to clearly demonstrate how the development delivers energy efficient improvements when compared to the existing buildings on the estate.

Uncertain Impacts:

SO3 Water Quality, SO5 Soil and Land Quality, SO6 Air Quality, SO7 Noise, SO8 Transport, SO9 Flood Risk, SO11 Built Environment, SO12 Historic Environment, , SO19 Health and Wellbeing -

Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants. Limitations in relation to flood risk will also need to be considered. Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. An open section of Bunces Ditch (a designated main river) exists to the South of Merantum Way, which may have origins within the estate and will need to be fully investigated. The sites is within Flood Zones 1 and 2. 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 Local Surface Water Management Plan. New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy. Development will need to consider potential impacts with regards to the historic environment and identify suitable mitigation measures.

Negative Impacts:

SO2 Climate Change, SO13 Energy and Carbon, SO15 Waste

The development will need to include appropriate flood mitigation measures and include a SuDS strategy to reduce surface water runoff. The feasibility of CHP and district heating must be investigated. Development will result in an increase in greenhouse gas emissions, energy and waste produced. Mitigation measures that minimise the impacts through sustainable design and construction practices will need to be identified. Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's energy hierarchy when compared to existing buildings on the estate. Consideration should be given to the inclusion of battery storage in connection to domestic solar PV systems to reduce on-site renewable energy consumption, reduce utility costs and provide in-situ demand side management.

Sustainability Objectives		HIGH PATH EP H7: Landscape				Commentary
		H7	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Landscape of the public open spaces and communal gardens must be accessible and of the highest quality. The existing mature trees should be retained and landscape must be a key feature in the provision of private space in front of houses.
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.					The retention of trees can have clear benefits in relation to flood mitigation. Other landscape measures, which could have beneficial impacts should be identified in the detailed design.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					Landscape measures, which could have beneficial impacts should be identified in the detailed design.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Landscape measures, which could have beneficial impacts should be identified in the detailed design.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Landscape measures, which could have beneficial impacts should be identified in the detailed design.
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					The retention of trees can have a positive impact in relation to flood mitigation. Other landscape measures, which could have beneficial impacts should be identified in the detailed design
SO10	BIODIVERSITY To protect and enhance biodiversity.					The retention of trees can have a positive benefit in relation to biodiversity. Other landscape measures, which could have beneficial impacts should be identified in the detailed design

Sustainability Objectives		HIGH PATH EP H7: Landscape				Commentary
		H7	S	M	L	
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					Landscape of the public open spaces and communal gardens must be accessible and of the highest quality. The existing mature trees should be retained and landscape must be a key feature in the provision of private space in front of houses.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					The impact upon the Historic environment will need to be considered in the detailed design.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Landscape of the public open spaces and communal gardens must be accessible and of the highest quality. The existing mature trees should be retained and landscape must be a key feature in the provision of private space in front of houses.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The provision of suitable landscape may have a positive impact upon the access to leisure and social activities.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The provision of suitable landscape may have a positive impact upon the health and wellbeing of residents.

Sustainability Objectives		HIGH PATH EP H7: Landscape				Commentary
		H7	S	M	L	
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

High Path EP H7 Summary:

Minor Positive Impacts:

SO1 Land Use, SO11 Built Environment, SO14 Open Space, SO17 Access to Activities, SO19 Health and Wellbeing

Landscape of the public open spaces and communal gardens must be accessible and of the highest quality. The existing mature trees should be retained and landscape must be a key feature in the provision of private space in front of houses.

Uncertain Impacts:

SO2 Climate Change, SO3 Water Quality, SO5 Soil and Land Quality, SO6 Air Quality, SO9 Flood Risk , SO10 Biodiversity, SO12 Historic Environment - The retention of trees can have clear benefits in relation to flood mitigation. Other landscape measures, which could have beneficial impacts on the above objectives should be identified in the detailed design.

Sustainability Objectives		HIGH PATH EP H8: Building Heights				Commentary
		H8	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Redevelopment should create a consistent character that fits in harmoniously with the surrounding development. Building heights should be based on a comprehensive townscape appraisal and visual assessment and should make a positive contribution to the existing townscape, character and local distinctiveness of the area. Taller buildings may be considered appropriate to facilitate intensified use of the site.
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.					The potential impact of taller buildings upon microclimate and overshadowing or the effect that increased density can have upon the urban heat island effect will need to be considered.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		HIGH PATH EP H8: Building Heights				Commentary
		H8	S	M	L	
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					Redevelopment should create a consistent character that fits in harmoniously with the surrounding development. Building heights should be based on a comprehensive townscape appraisal and visual assessment and should make a positive contribution to the existing townscape, character and local distinctiveness of the area.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					Building heights should be based on a comprehensive townscape appraisal and visual assessment and should make a positive contribution to the existing townscape, character and local distinctiveness of the area. Building heights along High Path should reflect its historic character as a narrow historic street and ensure that it sensitively takes account of the setting of St John the Divine Church.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					The potential impact of taller buildings upon microclimate and overshadowing or the effect that increased density can have upon the urban heat island effect will need to be considered in the detailed design.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Building heights should be based on a comprehensive townscape appraisal and visual assessment and should make a positive contribution to the existing townscape, character and local distinctiveness of the area.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Redevelopment should create a consistent character that fits in harmoniously with the surrounding development. Building heights should be based on a comprehensive townscape appraisal and visual assessment and should make a positive contribution to the existing townscape, character and local distinctiveness of the area. Taller buildings may be considered appropriate to facilitate intensified use of the site and thereby provide an increase in the number of homes.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact

Sustainability Objectives		HIGH PATH EP H8: Building Heights				Commentary
		H8	S	M	L	
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					No significant impact
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					The viability and deliverability of the proposals will need to be demonstrated

High Path EP H8 Summary:

Minor Positive Impacts:

SO1 Land Use, SO11 Built Environment, SO12 Historic Environment - Redevelopment should create a consistent character that fits in harmoniously with the surrounding development. Building heights should be based on a comprehensive townscape appraisal and visual assessment and should make a positive contribution to the existing townscape, character and local distinctiveness of the area. Taller buildings may be considered appropriate to facilitate intensified use of the site and thereby provide an increase in the number of homes.

Uncertain Impacts:

SO2 Climate Change, SO13 Energy and Carbon, SO14 Open Space, SO16 Housing, SO26 Viability and Deliverability

The potential impact of taller buildings upon microclimate and overshadowing or the effect that increased density can have upon the urban heat island effect will need to be considered in the detailed design. The viability and deliverability of the proposals will need to be demonstrated

Sustainability Objectives		RAVENSBURY EP R1: Townscape				
		R1	S	M	L	Commentary
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The townscape of the estate is somewhat secondary to the landscape. The development provides the opportunity to improve the landscape and setting of the existing buildings.
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact
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					The townscape of the estate is somewhat secondary to the landscape. The development provides the opportunity to improve the landscape and setting of the existing buildings. The architecture and design of the buildings should be drawn from the surrounding good quality townscape such as Ravensbury Mill, The Surrey Arms and White Cottage

Sustainability Objectives		RAVENSBURY EP R1: Townscape				Commentary
		R1	S	M	L	
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					The proposals should utilise local history as a point of reference in the development of the scheme
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The development provides the opportunity to improve the landscape and setting of the existing buildings
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The development provides the opportunity to improve the landscape and setting of the existing buildings
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					No significant impact
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					The development provides the opportunity to improve the landscape and setting of the existing buildings, which may reduce crime and the fear of crime
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact

Sustainability Objectives		RAVENSBURY EP R1: Townscape				Commentary
		R1	S	M	L	
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Ravensbury EP R1 Summary:

The Policy would have a minor positive impact for **SO1 Land Use, SO11 Built Environment, SO12 Historic Environment SO14 Open Space, SO17 Access to Activities and SO22 Crime**. The townscape of the estate is somewhat secondary to the landscape. The development provides the opportunity to improve the landscape and setting of the existing buildings. The architecture and design of the buildings should be drawn from the surrounding good quality townscape such as Ravensbury Mill, The Surrey Arms and White Cottage

Sustainability Objectives		RAVENSBURY EP R2: Street Network				Commentary
		R2	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Ravensbury Grove should be extended fully to the boundary of Ravensbury Park providing clear views along its whole length. The new street network should provide clear connections that will reduce the current detached nature of the estate.
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					The new street network has the potential to include traffic management measures and improvements to pedestrian and cycle routes.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					The new street network could allow for flood attenuation measures to be introduced such as a swale or uncovering of the historic watercourse
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact
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					The new street network should provide clear connections that will reduce the current detached nature of the estate. The historic street pattern of Ravensbury Grove should be retained.

Sustainability Objectives		RAVENSBURY EP R2: Street Network				Commentary
		R2	S	M	L	
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					The historic street pattern of Ravensbury Grove should be retained.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					No significant impact
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The new street network has the potential to include traffic management measures and improvements to pedestrian and cycle routes.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The new street network has the potential to include traffic management measures and improvements to pedestrian and cycle routes, which can positive impacts for health and wellbeing
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					The new street network has the potential to include traffic management measures and improvements to pedestrian and cycle routes.
SO22	CRIME To reduce crime and the fear of crime.					The new street network has the potential to include traffic management measures and improvements to pedestrian and cycle routes, which may reduce crime and the fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact

Sustainability Objectives		RAVENSBURY EP R2: Street Network				Commentary
		R2	S	M	L	
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Ravensbury EP R2 Summary:

The Policy would have a positive impact upon **SO1 Land Use, SO8 Transport, SO9 Flood Risk, SO11 Built Environment, SO12 Historic Environment, SO17 Access to Activities, SO19 Health and Wellbeing, SO21 Services and Facilities, and SO22 Crime**. Ravensbury Grove should be extended fully to the boundary of Ravensbury Park providing clear views along its whole length. The new street network should provide clear connections that will reduce the current detached nature of the estate. The new street network could allow for flood attenuation measures to be introduced such as a swale or uncovering of the historic watercourse and has the potential to include traffic management measures and improvements to pedestrian and cycle routes, which may also reduce crime and the fear of crime.

Sustainability Objectives		RAVENSBURY EP R3: Movement & Access				Commentary
		R3	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The development offers the potential to improve both the number and quality of links to and within the estate
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					Proposals should include new and improved pedestrian and cycle routes and include measures to improve traffic management and road safety. Proposals will need to be supported by appropriate traffic modelling and be in general compliance with relevant transport policies and parking standards.
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact
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					The development offers the potential to improve both the number and quality of links to and within the estate for pedestrians, cyclists and vehicles.

Sustainability Objectives		RAVENSBURY EP R3: Movement & Access				Commentary
		R3	S	M	L	
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The development should consider the improvement of the crossing from Morden Hall Park to Ravensbury Park. Entrances into the park should be carefully designed and located to ensure accessibility. There is also the potential to improve bridges and walkways within the park.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The development offers the potential to improve both the number and quality of links to and within the estate for pedestrians, cyclists and vehicles.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The development offers the potential to improve both the number and quality of links to and within the estate for pedestrians, cyclists and vehicles, which may have positive impacts for health and wellbeing.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					The development offers the potential to improve both the number and quality of links to and within the estate for pedestrians, cyclists and vehicles.
SO22	CRIME To reduce crime and the fear of crime.					The development offers the potential to improve both the number and quality of links to and within the estate for pedestrians, cyclists and vehicles, which may reduce crime and the fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact

Sustainability Objectives		RAVENSBURY EP R3: Movement & Access				Commentary
		R3	S	M	L	
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact
<p>Ravensbury EP R3 Summary:</p> <p>The policy has a minor positive impact upon SO1 Land Use, SO8 Transport, SO11 Built Environment, SO14 Open Space, SO17 Access to Activities, SO19 Health and Wellbeing, and SO22 Crime. Proposals should include new and improved pedestrian and cycle routes and include measures to improve traffic management and road safety. Proposals will need to be supported by appropriate traffic modelling and be in general compliance with relevant transport policies and parking standards. The development should consider the improvement of the crossing from Morden Hall Park to Ravensbury Park. Entrances into the park should be carefully designed and located to ensure accessibility. There is also the potential to improve bridges and walkways within the park.</p>						

Sustainability Objectives		RAVENSBURY EP R4: Land use				Commentary
		R4	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The predominant land use of the land will remain as residential, including the re-provision of the community room. The redevelopment will allow for an increase in the number and mix of high quality homes provided. It is considered unlikely that there will be demand for other non-residential land uses. The interface between any proposed development and Ravensbury Park needs careful consideration. Of particular importance should be the enhancement of the river corridor and its environment including the issues of flooding and surface water drainage.
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.					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.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					The site is within close proximity to the River Wandle and lies within Flood Zones 2 and 3a/b. The development proposals will need to include appropriate flood mitigation and incorporate a SuDS strategy
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					The development is likely to result in an increase in water consumption and wastewater. Mitigation measures that minimise the impacts through sustainable design practices or other policies should be identified.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants.
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants.
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.					The site has a PTAL rating of 2 (poor). Measures should be considered that will improve the connectivity of the site. The capacity of the public transport will also need to be considered. Development will need to provide a Transport Assessment and other relevant documents including Travel Plans and Construction Management Plans in accordance with TfL's best practice. Development will need to comply with DM EP4 pollutants
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					The site is within close proximity to the River Wandle and lies within Flood Zones 2 and 3a/b. The development proposals will need to include appropriate flood mitigation and incorporate a SuDS strategy. 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 Local Surface Water Management Plan.
SO10	BIODIVERSITY To protect and enhance biodiversity.					The redevelopment offers the opportunity for the protection and enhancement of biodiversity.

Sustainability Objectives		RAVENSBURY EP R4: Land use				Commentary
		R4	S	M	L	
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					The predominant land use of the land will remain as residential, including the re-provision of the community room. The redevelopment will allow for an increase in the number, mix and type of high quality homes provided. It is considered unlikely that there will be demand for other non-residential land uses.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					Development proposals will need to consider the impact upon the historic environment and identify any necessary mitigation measures.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					New development will result in an increase in energy and greenhouse emissions. Mitigation measures that minimise the impacts of energy and carbon through sustainable design practices or other policies that will be used should be identified.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The site is surrounded by high quality open space and there is no requirement to provide additional open space. The site includes a small area of designated open space, which is currently of poor quality. The regeneration of the site offers the potential to improve the provision.
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.					New development will result in an increase in waste. Mitigation measures that minimise the impacts of waste through sustainable design and construction practices or other policies that will be used should be identified.
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					The predominant land use of the land will remain as residential, including the re-provision of the community room. The redevelopment will allow for an increase in the number, mix and type of high quality homes provided. Densities must be assessed with consideration of relevant design, planning, social, environmental and management factors.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The regeneration of the site may allow for access to activities to be improved.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The redevelopment will allow for an increase in the number, mix and type of high quality homes provided.
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The redevelopment will provide the opportunity for high quality efficient homes that meet decent home standards and improve the health and wellbeing of residents by providing an improved living environment.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					The regeneration of the site provides the opportunity to provide a greater number of homes, including the choice and mix of housing types and tenures, including greater affordable housing for a broad mix of community groups.
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					The regeneration of the site may allow for access to services and facilities to be improved.
SO22	CRIME To reduce crime and the fear of crime.					The regeneration of the site may allow crime and the fear of crime to be reduced.

Sustainability Objectives		RAVENSBURY EP R4: Land use				Commentary
		R4	S	M	L	
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					Major development proposals will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development. Non-residential uses may be considered appropriate.
SO25	EMPLOYMENT To increase local employment and skills					Major development proposals will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development.
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					Financial modelling has been carried out over a 50year period. The redevelopment would involve a high level of up front costs but would deliver regeneration benefits that would last for the long term. The current modelling shows that the redevelopment is the most economic and deliverable option for the site. Further work on the modelling is being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed.

Ravensbury EP R4 Summary:

Major Positive Impacts:

SO1 Land Use, SO11 Built Environment, SO16 Housing - The predominant land use of the land will remain as residential, including the re-provision of the community room. The redevelopment will allow for an increase in the number, mix and type of high quality homes provided. It is considered unlikely that there will be demand for other non-residential land uses. The redevelopment will allow for an increase in the number, mix and type of high quality homes provided. Densities must be assessed with consideration of relevant design, planning, social, environmental and management factors.

Minor Positive Impacts:

SO10 Biodiveristy, SO14 Open Space, SO18 Social Deprivation, SO19 Health and wellbeing, SO20 Diversity and Equality, SO22 Crime, SO24 Economic Growth, SO25 Employment - The predominant land use will remain as residential to accord with the current land use and that of the surrounding area. The site is surrounded by high quality open space and there is no requirement to provide additional open space. The site includes a small area of designated open space, which is currently of poor quality. The regeneration of the site offers the potential to improve the provision. The redevelopment of the site provides the opportunity to provide a greater number of houses including the choice and mix of housing types and tenures, including greater affordable housing and housing for a broader mix of community groups. Major development opportunities will be expected to provide employment opportunities for local residents and businesses during both the construction and operation of the development.

Uncertain Impacts:

SO 4 Water Resources, SO5 Soil and Land Quality, SO6 Air Quality, SO7 Noise, SO8 Transport, SO9 Flood Risk, SO12 Historic Environment, SOSO17 Access to Activities, SO26 Viability and Deliverability - Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants. The regeneration of the site may allow for access to activities be improved. The site has a PTAL rating of 2 (poor). Measures should be considered that will improve the connectivity of the site. The capacity of the public transport will also need to be considered. Financial modelling has been carried out over a 50year period. The redevelopment would involve a high level of up-front costs but would deliver regeneration benefits that would last for the long term. The site is within close proximity to the River Wandle and lies within Flood Zones 2and 3a/b. The development proposals will need to include appropriate flood mitigation and incorporate a SuDS strategy. 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 current modelling shows that the redevelopment is the most economic and deliverable option for the site. Further work on the modelling is being carried out, including the potential to incorporate units for private occupation to enhance the overall viability. A phasing and decanting plan will also need to be developed. The impact of the development proposals on the historic environment will need to be considered and suitable mitigation identified.

Negative Impacts:

SO2 Climate Change, SO13 Energy and Carbon, SO15 Waste - Development will result in an increase in energy, greenhouse emissions and waste. Mitigation measures that minimise the impacts and enable suitable adaptation to be implemented through sustainable design and construction practices should be identified.

Sustainability Objectives		RAVENSBURY EP R5: Open Space				Commentary
		R5	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					Equivalent or better re-provision of the designated open space in terms of quality and quantity will be required, including suitably designed play spaces, the retention of the existing communal garden and gardens that meet current space standards.
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.					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 retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site.
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					The site is within close proximity to the River Wandle and lies within Flood Zones 2 and 3a/b. The development proposals will need to include appropriate flood mitigation and incorporate a SuDS strategy. The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site.
SO10	BIODIVERSITY To protect and enhance biodiversity.					The retention and improvement of the areas of open space will offer the potential to protect and enhance the 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					The retention and improvement of the areas of open space will provide the opportunity to improve the setting and amenity of the built environment

Sustainability Objectives		RAVENSBURY EP R5: Open Space				Commentary
		R5	S	M	L	
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					The impact of the development proposals on the historic environment will need to be considered in the detailed design and suitable mitigation measures identified.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The retention and improvement of the areas of open space provides the opportunity to include new and improved areas of amenity and play space
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					All new houses and flats should have gardens or amenity space that exceeds current space standards.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					The retention and improvement of the areas of open space provides the opportunity to include new and improved areas of amenity and play space
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The retention and improvement of the areas of open space provides the opportunity to include new and improved areas of amenity and play space, which can positive benefits for the health and wellbeing of residents
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact

Sustainability Objectives		RAVENSBURY EP R5: Open Space				Commentary
		R5	S	M	L	
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					The retention and improvement of the areas of open space provides the opportunity to include new and improved areas of amenity and play space that are safer for residents
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Ravensbury EP R5 Summary:

Major Positive Impacts:

SO1 Land Use, SO 14 Open Space - Equivalent or better re-provision of the designated open space in terms of quality and quantity will be required, including suitably designed play spaces, the retention of the existing communal garden and gardens that meet current space standards.

Minor Positive Impacts:

SO3 Water Quality, SO5 Soil and Land Quality, SO10 Biodiversity, SO11 Built Environment, SO16 Housing, SO17 Access to Activities, SO19 Health and Wellbeing, SO22 Crime

The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site and to protect and enhance the biodiversity. The retention and improvement of the areas of open space including suitably designed spaces for play and recreation provides the opportunity for the inclusion of a variety of activities for social and leisure activities, which may have benefits for the health and well-being of residents.

Uncertain Impacts:

SO2 Climate Change, SO9 Flood Risk, SO12 Historic Environment - 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 site is within close proximity to the River Wandle and lies within Flood Zones 2 and 3a/b. The development proposals will need to include appropriate flood mitigation and incorporate a SuDS strategy. The retention and improvement of the areas of open space will offer the potential for surface water run-off and storage as part of the SuDS strategy for the site. The impact of the development proposals on the historic environment will need to be considered in the detailed design and suitable mitigation measures identified.

Sustainability Objectives		RAVENSBURY EP R6: Environmental Protection				Commentary
		R6	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The predominant land use of the land will remain as residential, including the re-provision of the community room. The redevelopment will allow for an increase in the number and mix of high quality homes provided. The interface between any proposed development and Ravensbury Park needs careful consideration. Of particular importance should be the enhancement of the river corridor and its environment including the issues of flooding and surface water drainage.
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.					The development will need to include appropriate flood mitigation measures and include a SuDS strategy to reduce surface water runoff. Development will result in an increase in greenhouse gas emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices or other policies that will be used will need to be identified.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. The site is in Flood Zones 2 and 3a/b and is in close proximity to the River Wandle. An undeveloped 8m buffer from the top bank of the river should be included. Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants..
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					The development is likely to result in an increase in water consumption and wastewater. Mitigation measures that minimise the impacts through sustainable design practices or other policies should be identified.
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants. Applicants will need to demonstrate how their plans contribute to improving air quality.
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants.
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.					Development will need to provide a Transport Assessment and other relevant documents including Travel Plans and Construction Management Plans in accordance with TfL's best practice. Development will need to comply with DM EP4 pollutants
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. The site is in Flood Zones 2 and 3a/b and is in close proximity to the River Wandle. An undeveloped 8m buffer from the top bank of the river should be included. 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.

Sustainability Objectives		RAVENSBURY EP R6: Environmental Protection				Commentary
		R6	S	M	L	
SO10	BIODIVERSITY To protect and enhance biodiversity.					Proposals should seek to create mini corridors to enhance biodiversity and create links with the surrounding parkland and river corridor habitats. New development must also ensure the protection and enhancement of protected species within Ravensbury Park and demonstrate net gains in biodiversity. There is also the potential to include river bank enhancements providing they do not increase flood risk.
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					The interface between any proposed development and Ravensbury Park needs careful consideration. Of particular importance should be the enhancement of the river corridor and its environment including the issues of flooding and surface water drainage. Flood resistant and resilient design will be needed. New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					Development proposals will need to consider the impact on the historic environment in the detailed design and identify suitable mitigation measures.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					Development will result in an increase in energy consumption. Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's energy hierarchy when compared to existing buildings on the estate. Consideration should be given to the inclusion of battery storage in connection to domestic solar PV systems to reduce on-site renewable energy consumption, reduce utility costs and provide in-situ demand side management.
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					Proposals should seek to create links with the surrounding parkland and river corridor habitats. New development must also ensure the protection and enhancement of protected species within Ravensbury Park and demonstrate net gains in biodiversity. There is also the potential to include river bank enhancements providing they do not increase flood risk. Public realm proposals should be co-ordinated with the wider SuDS strategy.
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.					Development will result in an increase in waste. Mitigation measures that minimise the impacts and enable suitable adaptation to be implemented through sustainable design and construction practices should be identified. A working method statement and construction logistics plan will be needed and development proposals should apply the waste hierarchy.
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Energy strategies will need to clearly demonstrate how the development delivers energy efficient improvements when compared to the existing buildings on the estate.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					Proposals should seek to create links with the surrounding parkland and river corridor habitats.
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					The improvement in energy efficiency of homes may help to reduce the level of fuel poverty amongst residents

Sustainability Objectives		RAVENSBURY EP R6: Environmental Protection				Commentary
		R6	S	M	L	
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants. The improvements in the efficiency and quality of the homes may lead to improvements in the health and well-being of residents.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact
SO22	CRIME To reduce crime and the fear of crime.					Improvements to the layout and open space can have a positive impact upon crime and fear of crime
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					The viability and deliverability of the proposed measures will need to be demonstrated.

Ravensbury EP R6 Summary:

Major Positive Impacts:

SO10 Biodiversity, SO14 Open Space - Proposals should seek to create links with the surrounding parkland and river corridor habitats. New development must also ensure the protection and enhancement of protected species within Ravensbury Park and demonstrate net gains in biodiversity. There is also the potential to include river bank enhancements providing they do not increase flood risk. Public realm proposals should be co-ordinated with the wider SuDS strategy.

Minor Positive Impacts:

SO1 Land Use, SO16 Housing, SO17 Access to Activities - The predominant land use of the land will remain as residential, including the re-provision of the community room. The redevelopment will allow for an increase in the number and mix of high quality homes provided. Energy strategies will need to clearly demonstrate how the development delivers energy efficient improvements when compared to the existing buildings on the estate. The interface between any proposed development and Ravensbury Park needs careful consideration. Of particular importance should be the enhancement of the river corridor and its environment including the issues of flooding and surface water drainage. Proposals should seek to create links with the surrounding parkland and river corridor habitats.

Uncertain Impacts:

SO3 Water Quality, SO5 Soil and Land Quality, SO6 Air Quality, SO7 Noise, SO8 Transport, SO9 Flood Risk, SO11 Built Environment, SO12 Historic Environment, SO18 Social Deprivation, SO19 Health and Wellbeing, SO26 Viability and Deliverability - Development will need to comply with London Plan policy 5.3 Sustainable Design and Construction and DM EP4 pollutants. Development proposals will need to include appropriate flood mitigation measures where appropriate and incorporate a SuDS strategy. The site is in Flood Zones 2 and 3a/b and is in close proximity to the River Wandle. An undeveloped 8m buffer from the top bank of the river should be included. The interface between any proposed development and Ravensbury Park needs careful consideration. Of particular importance should be the enhancement of the river corridor and its environment including the issues of flooding and surface water drainage. Flood resistant and resilient design will be needed. 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. Development will need to provide a Transport Assessment and other relevant documents including Travel Plans and Construction Management Plans in accordance with TfL's best practice. New development should be designed to minimise emissions arising throughout their lifetime by making efficient use of land, resources, materials and energy. Development proposals will need to consider the impact on the historic environment in the detailed design and identify suitable mitigation measures. The improvements in the efficiency and quality of the homes may lead to improvements in the level of fuel poverty of residents and the health and well-being of residents. The viability and deliverability of the proposed measures will need to be demonstrated.

Negative Impacts:

SO2 Climate Change, SO13 Energy and Carbon, SO15 Waste

The development is in Flood Zone 2 and 3a/b and will need to include appropriate flood mitigation measures and include a SuDS strategy to reduce surface water runoff. Development will result in an increase in greenhouse gas emissions, energy consumed and waste produced. Mitigation measures that minimise the impacts through sustainable design and construction practices will need to be identified. Energy strategies should clearly demonstrate that development delivers energy efficiency improvements at each level of the Mayor's energy hierarchy when compared to existing buildings on the estate. Consideration should be given to the inclusion of battery storage in connection to domestic solar PV systems to reduce on-site renewable energy consumption, reduce utility costs and provide in-situ demand side management. A working method statement and construction logistics plan will be needed and development proposals should apply the waste hierarchy.

Sustainability Objectives		RAVENSBURY EP R7: Landscape				Commentary
		R7	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					The site is defined and characterised by its landscape setting of the two parks and the River Wandle. The regeneration offer opportunities to enhance this character whilst still increasing the density and building height of the development.
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.					Street planting and the landscape should include flood mitigation measures.
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					Street planting and the landscape should include flood mitigation measures
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					The site is defined and characterised by its landscape setting of the two parks and the River Wandle, an essential element to the site's character, which should not be lost.
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					Tree species should be specified to mitigate against pollution
SO7	NOISE To improve amenity by minimising the impact associated with noise.					Tree species should be specified to mitigate against 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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					Street planting and the landscape should include flood mitigation measures. The site is within Flood Zones 2 and 3a/b. Development will be subject to a Sequential Test and site specific FRA in accordance with the NPPF.
SO10	BIODIVERSITY To protect and enhance biodiversity.					Street planting and the landscape should include biodiversity enhancements. There is scope to strengthen the green corridor link between Morden Hill Park and Ravensbury Park through the use of landscape features. Existing mature trees should be retained.

Sustainability Objectives		RAVENSBURY EP R7: Landscape				Commentary
		R7	S	M	L	
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					The site is defined and characterised by its landscape setting of the two parks and the River Wandle. The regeneration offer opportunities to enhance this character whilst still increasing the density and building height of the development.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					No significant impact
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The site is defined and characterised by its landscape setting of the two parks and the River Wandle. The regeneration offer opportunities to enhance this character. There is scope to strengthen the green corridor link between Morden Hill Park and Ravensbury Park through the use of landscape features. Existing mature trees should be retained.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					No significant impact
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					An integral part of the proposals should be the significant widening and enhancement of the entrance to Ravensbury Park off Morden Road. Landscape treatments should emphasise green links and the river crossing
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					The site is defined and characterised by its landscape setting of the two parks and the River Wandle. The regeneration offer opportunities to enhance this character, which can have positive impacts for the health and wellbeing of residents.
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact

Sustainability Objectives		RAVENSBURY EP R7: Landscape				Commentary
		R7	S	M	L	
SO22	CRIME To reduce crime and the fear of crime.					The site is defined and characterised by its landscape setting of the two parks and the River Wandle. The regeneration offer opportunities to enhance this character, which can have positive impacts for crime and fear of crime.
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					No significant impact

Ravensbury EP R7 Summary:

Major Positive Impacts:

SO1 Land Use, SO11 Built Environment, SO14 Open Space - The site is defined and characterised by its landscape setting of the two parks and the River Wandle. The regeneration offer opportunities to enhance this character, whilst still increasing the density and building height of the development. There is scope to strengthen the green corridor link between Morden Hill Park and Ravensbury Park through the use of landscape features. Existing mature trees should be retained.

Minor Positive Impacts:

SO2 Climate Change, SO3 Water Quality, SO5 Soil and Land Quality, SO6 Air Quality, SO7 Noise, SO10 Biodiversity, SO11 Built Environment, SO17 Access to Activities, SO19 Health and Wellbeing, SO22 Crime

Street planting and the landscape should include flood mitigation measures and biodiversity enhancements. There is scope to strengthen the green corridor link between Morden Hill Park and Ravensbury Park through the use of landscape features. Existing mature trees should be retained. An integral part of the proposals should be the significant widening and enhancement of the entrance to Ravensbury Park off Morden Road. Landscape treatments should emphasise green links and the river crossing. The site is defined and characterised by its landscape setting of the two parks and the River Wandle. The regeneration offers opportunities to enhance this character, which can have positive impacts for the health and wellbeing of residents and crime.

Uncertain Impacts:

SO9 Flood Risk - Street planting and the landscape should include flood mitigation measures. The site is within Flood Zones 2 and 3a/b. Development will be subject to a Sequential Test and site specific FRA in accordance with the NPPF.

Sustainability Objectives		RAVENSBURY EP R8: Building Heights				Commentary
		R8	S	M	L	
SO1	LAND USE To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.					It is recognised that there is a need to increase density, however, any increase should be of a scale that respects the landscape character of the area. Building heights should be based on a comprehensive townscape appraisal and visual assessment and make a positive contribution to the existing townscape.
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.					No significant impact
SO3	WATER QUALITY To reduce water pollution and improve water quality and resources in the River Wandle.					No significant impact
SO4	WATER RESOURCES To reduce water consumption and ensure water saving measures and adequate water and wastewater infrastructure supports new development.					No significant impact
SO5	SOIL AND LAND QUALITY To maintain and improve soil and land quality.					No significant impact
SO6	AIR QUALITY To ensure the risks of air pollution to human health and environment are reduced.					No significant impact
SO7	NOISE To improve amenity by minimising the impact associated with noise.					No significant impact
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.					No significant impact
SO9	FLOOD RISK To reduce the flood risk to people and property from all sources of flooding including surface water flooding.					No significant impact
SO10	BIODIVERSITY To protect and enhance biodiversity.					No significant impact

Sustainability Objectives		RAVENSBURY EP R8: Building Heights				Commentary
		R8	S	M	L	
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					The redevelopment proposals must give careful consideration to the site layout, landscape, building heights and street widths. It is recognised that there is a need to increase density, however, any increase should be of a scale that respects the landscape character of the area. Building heights should be based on a comprehensive townscape appraisal and visual assessment and make a positive contribution to the existing townscape.
SO12	HISTORIC ENVIRONMENT To conserve and enhance heritage assets and their settings					Building heights should be based on a comprehensive townscape appraisal and visual assessment and make a positive contribution to the existing townscape.
SO13	ENERGY AND CARBON REDUCTION To ensure specific measures, to improve energy efficiency and reduce greenhouse gas emissions, are used in developments.					No significant impact
SO14	OPEN SPACE To ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space, including play and recreation areas.					The views of the tree line are a defining characteristic of the estate, which should be take into consideration in conjunction with the landscape character in the development proposals.
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.					No significant impact
SO16	HOUSING Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.					Existing buildings are mainly 2 storey, with the exception of one larger 4 storey block. Any increase in height will need to be addressed sensitively and be of a scale that respects the landscape character of the area. An increase in density on the site will result in an increase in the number of homes.
SO17	ACCESS TO ACTIVITIES Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.					No significant impact
SO18	SOCIAL DEPRIVATION To contribute to reducing poverty and encouraging social inclusion.					No significant impact
SO19	HEALTH AND WELLBEING To improve the health and wellbeing of residents and reduce health inequalities.					No significant impact
SO20	DIVERSITY AND EQUALITY To support diversity and equality in order to promote community cohesion.					No significant impact
SO21	SERVICES AND FACILITIES To ensure accessibility to essential services and facilities.					No significant impact

Sustainability Objectives		RAVENSBURY EP R8: Building Heights				Commentary
		R8	S	M	L	
SO22	CRIME To reduce crime and the fear of crime.					No significant impact
SO23	EDUCATION AND SKILLS To improve the education and skills of the population.					No significant impact
SO24	ECONOMIC GROWTH To support economic growth and business development					No significant impact
SO25	EMPLOYMENT To increase local employment and skills					No significant impact
SO26	VIABILITY AND DELIVERABILITY To ensure the deliverability of viable development					The viability and deliverability of the development will need to be demonstrated.

Ravensbury EP R8 Summary:

Minor Positive Impacts:

SO1 Land Use, SO11 Built Environment, SO12 Historic Environment, SO14 Open Space, SO16 Housing - The redevelopment proposals must give careful consideration to the site layout, landscape, building heights and street widths. It is recognised that there is a need to increase density, however, any increase should be of a scale that respects the landscape character of the area. Building heights should be based on a comprehensive townscape appraisal and visual assessment and make a positive contribution to the existing townscape. Existing buildings are mainly 2 storey, with the exception of one larger 4 storey block. Any increase in height will need to be addressed sensitively and be of a scale that respects the landscape character of the area. An increase in density will result in an increase in the number of homes. The views of the tree line are a defining characteristic of the estate, which should be take into consideration in conjunction with the landscape character in the development proposals.

Uncertain Impacts:

The viability and deliverability of the development will need to be demonstrated.

A8 Cumulative Impacts Assessment

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

Policies

Sustainability Objectives		EASTFIELDS								HIGH PATH								RAVENSBURY								C
		1	2	3	4	5	6	7	8	1	2	3	4	5	6	7	8	1	2	3	4	5	6	7	8	C
SO1	Land use	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SO2	Climate Change	Green	Green	Green	Orange	Yellow	Orange	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange
SO3	Water Quality	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow
SO4	Water Resources	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow
SO5	Soil	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	
SO6	Air Quality	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	
SO7	Noise	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	
SO8	Transport	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	
SO9	Flood Risk	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	
SO10	Biodiversity	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO11	Built Environ.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO12	Historic Environ.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	
SO13	Energy & Carbon	Green	Green	Green	Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	
SO14	Open Space	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO15	Waste	Green	Green	Green	Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	
SO16	Housing	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO17	Access to Activities	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO18	Social Deprivation	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO19	Health & Wellbeing	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO20	Diversity & Equality	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO21	Services & Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO22	Crime	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO23	Education & Skills	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO24	Economic Growth	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO25	Employment	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
SO26	Viability/Deliverable	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	

A9 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

The 2011 Act also introduced a Public Sector Equality Duty to ensure that in exercising the Council's functions and delivering services and partnership work, the Council will:

- Eliminate discrimination, harassment, victimisation
- Advance quality of opportunity between persons who share a protected characteristic and persons who do not share a protected characteristic
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The ongoing discharge of the Duty will require further consideration at the points where planning applications are received, the adoption of the Estates Local Plan and other decisions the Council may need to consider under its various powers. The Duty does not require the need to avoid all harmful effects but to recognise them, eliminate them wherever possible (and always with regard to unlawful discrimination or harassment) and mitigate any remaining consequences.

London Borough of Merton Equality Strategy 2013-17

Merton's Equality Strategy sets out the Council's equality objectives and outlines how the Council will embed equalities considerations into day-to-day business.

The Equality Objectives are grouped into the following five themes:

- Tackling inequality
- Service access
- Improving engagement
- Promoting community cohesion
- Workforce development

The Strategy sets out how the Council is committed to carrying its legal responsibilities including:

- Promoting equal opportunities, social inclusion and human rights
- Eliminating unlawful discrimination and disadvantage
- Eliminating harassment and victimisation
- Promoting a positive attitude towards people of different backgrounds, disabled people and others
- Encouraging participation by people of all backgrounds in all public life
- Valuing diversity and promoting good relations between individuals, communities and employees of all backgrounds
- Taking the necessary steps towards meeting the needs of disabled people and others.

Estates Local Plan

The purpose of the EqIA is to assess the impact of a policy, strategy or service in the Borough in terms of the nine protected characteristics.

CHMP prepared an Equality Analysis as part of the regeneration proposals in August 2015, which has been used to inform this assessment. The Equality Analysis has identified that the 'protected characteristics' of: Age, Disability and Race are particularly relevant to the regeneration proposals and there is the potential for these groups to be negatively affected. The assessment has therefore focussed on these issues.

A summary of relevant data is provided below.

Demographic Profile of the Estates

Ethnicity

There are a number of households on each estate where English is not the first language of the householder or tenant. There are also a number of households on each of the estates from black and minority ethnic (BAME) communities. All three wards have shown an increase in the number of BAME households since the last census. There is evidence that BAME households are more likely to be overcrowded than other comparable households, which will need to be taken into consideration when consulting with households on their future housing needs. The ethnicity breakdown for each of the Estates is as follows:

Ethnicity	Eastfields	High Path	Ravensbury
White British	113	174	79
Black/Black British African	51	43	16
Black/Black British Caribbean	34	29	12
Prefer Not to Say	15	29	23
Asian/Asian British Other	15	28	5
Mixed White & Black Caribbean	9	7	1
White Other	8	27	2
Black/Black British Other	7	4	3
Asian/Asian British Pakistani	5	8	4
Mixed White & Asian	4	4	-
Asian/Asian British Indian	4	10	-
Mixed Other	3	4	1
White Irish	3	13	5
Asian/Asian British Bangladeshi	2	11	2
Chinese/Other Ethnic Group	2	14	6
Mixed White & Black African	-	2	-
Unknown	4	2	8

Age and Disability

The information has been taken from the Local Authority Ward profile data – Low Super Output Areas (LSOA), which relate to the following wards:

- Eastfields Estate – Figge’s Marsh (LSOA E0103391)
- High Path Estate – Abbey Ward (LSOA E0103357)
- Ravensbury Estate – Ravensbury (LSOA E01003440)

The information demonstrates that the residents of the estates are comparatively deprived when compared with ward, borough and national deprivation. There are also proportionately larger numbers of older households, when compared to the Borough average) on both the Ravensbury and High Path estates.

Eastfields	
Deprivation	Quintile 1 – Most deprived (Merton and nationally)
Age and Family Structure	<ul style="list-style-type: none"> • Higher proportion of very young children 0-4 12.8% (Figge’s Marsh 9.3%) • Lower proportion of adults aged 35-54 25.6% (Figge’s Marsh 28.8%) • Slightly higher proportion 55-79 age group 16.5% (Figge’s Marsh 15.6%) • Higher proportion of people under 65 living alone 27.8% (Figge’s Marsh 19.8%) • Higher proportion of lone parent families with dependent children 16.7% (Figge’s Marsh 12.5%)
Housing Overcrowding	<ul style="list-style-type: none"> • Higher overcrowding than the rest of the ward and Merton; in particular households which include dependent children • Of households with dependent children 51.8% are overcrowded (Figge’s Marsh 40.2%)
Health	<ul style="list-style-type: none"> • Higher proportion of long term sick or disabled 5.7% (Figge’s Marsh 3.8%)
Unemployed	<ul style="list-style-type: none"> • One third of households 33.3% where no adults work (Figge’s Marsh 28.4%, Merton 23.9%)

High Path	
Deprivation	Quintile 1 – Most deprived in Merton, National Quintile 2 - Second most deprived
Age and Family Structure	<ul style="list-style-type: none"> • Higher proportion of 0-19 age group 22.5% (Abbey 19.1%) and older adults aged 45-64 20.3% (Abbey 17.1%) • Lower proportion of adults aged 30-39 17.6% (Abbey 25.8%) • Significantly higher proportions of lone parent families 16.2% (Abbey 6.8%) both with dependent and non-dependent children
Housing Overcrowding	<ul style="list-style-type: none"> • Higher overcrowding than the rest of the ward and Merton; in particular households which include dependent children • Of households with dependent children 43.6% are overcrowded (Abbey 22.4%)
Health	<ul style="list-style-type: none"> • Higher proportion of long term sick or disabled 6.3% (Abbey 2.4%)
Unemployed	<ul style="list-style-type: none"> • One third of households 30.2% where no adults work (Abbey 20.5%, Merton 23.9%)

Ravensbury	
Deprivation	Quintile 1 – Most deprived in Merton, National Quintile 2 - Second most deprived
Age and Family Structure	<ul style="list-style-type: none"> • Higher proportion of 25-39 26.9% (Ravensbury 23.9%) • Slightly higher proportion of 0-4 age group 8.2% (Ravensbury 7.6%) • Higher proportion of people under 65 living alone 20.1% (Ravensbury 16.2%) • Similar proportion of lone parent families with dependent children compared to the ward 9.1%
Housing Overcrowding	<ul style="list-style-type: none"> • Overcrowding similar to the rest of the ward; in particular households which include dependent children • Of households with dependent children 36.4% are overcrowded (Ravensbury 35.0%)
Health	<ul style="list-style-type: none"> • Higher proportion of long term sick or disabled 8.9% (Ravensbury 4.1%)
Unemployed	<ul style="list-style-type: none"> • Over a quarter of households 28.7% where no adults work (Ravensbury 29.9%, Merton 23.9%)

Equality Impact Assessment & Sustainability Appraisal

As with the SA, the EqIA has informed and influenced the development of the Plan and will continue to be reviewed towards adoption. A specific indicator on [Diversity and Equality](#) has been added to the SA Framework to ensure that equalities issues have been identified, although there will be an impact within many of the Sustainability Objectives, specifically the following:

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

SO23 Education and Skills - To improve the education and skills of the population.

CHMP 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
- unsafe pathways.

Some of these issues were also raised in both Council consultations in 2014 and 2016, particularly concerns around unsafe pathways, damp and poor internal conditions.

As set out in the policies in the Council's Estates Local Plan, 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
- 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.

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.

Assessment of Policies

The Estates Local Plan contains a total of 24 policies (8 per estate) regarding the regeneration of the estates. The policies have been assessed as part of the SA, however, in order to ensure that 'protected characteristics' have been considered appropriately in the ELP a further assessment is set out below against the specific equality categories.

It is considered that the impacts from the policies upon the following 'protected characteristics' are likely to be of low/no impact as it is difficult to determine how the policies could affect the following groups in a significant way:

- Sex/Gender
- Religion
- Sexual Orientation
- Gender Reassignment Marriage and Civil Partnership
- Pregnancy and Maternity

The assessment therefore focuses on the following categories where the policies could potentially have an impact:

- Age
- Disability
- Race or belief

The impacts against the equalities groups are assessed as follows:

	Negative
	Minor negative
	Neutral
	Minor positive
	Positive

ELP Policies Equalities Assessment

Eastfields Policies	Equalities Categories	Impact	Assessment
EP E1: Townscape	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the urban design, layout and massing of the proposals and is considered neutral in terms of equalities considerations.
EP E2: Street Network	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the design of the street network and is considered neutral in terms of equalities considerations.
EP E3: Movement and Access	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy proposes the improvement of movement and access for vehicles, pedestrians and cyclists, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP E4: Land Use	<ul style="list-style-type: none"> Age Disability Race or belief 		The land use will remain as predominantly residential use with open space and re-provision of non-residential uses. Increased densities may be considered appropriate. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents' individual needs. The policy will have a positive impact for all equality groups.
EP E5: Open Space	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy provides for the re-provision of the equivalent or better open space which is likely to have a positive impact for all residents, including the elderly and disabled.
EP E6: Environmental Protection	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy sets out a range of measures to ensure improvements in environmental performance including flood risk, energy efficiency and pollution during construction and operation. Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes, which will have a positive impact for all equality groups.
EP E7: Landscape	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the design of the landscape proposals and is considered neutral in terms of equalities considerations.
EP E8: Building Heights	<ul style="list-style-type: none"> Age Disability Race or belief 		The policy concerns the building heights of the proposals and is considered neutral in terms of equalities considerations.

High Path Policies	Equalities Categories	Impact	Assessment
EP H1: Townscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the urban design, layout and massing of the proposals and is considered neutral in terms of equalities considerations.
EP H2: Street Network	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the street network. Increased accessibility for pedestrians and cyclists must be designed into the street network. which is likely to have a positive impact for all residents, including the elderly and disabled.
EP H3: Movement and Access	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy proposes the improvement of movement and access for vehicles, pedestrians and cyclists, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP H4: Land Use	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The land use will remain as predominantly residential use with open space and re-provision of non-residential uses. Increased densities may be considered appropriate. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents' individual needs. The policy will have a positive impact for all equality groups.
EP H5: Open Space	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		Development proposals must provide public open space to address the identified deficiency in access to Local Open Spaces, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP H6: Environmental Protection	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy sets out a range of measures to ensure improvements in environmental performance including flood risk, energy efficiency and pollution during construction and operation. Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes, which will have a positive impact for all equality groups.
EP H7: Landscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the landscape proposals and is considered neutral in terms of equalities considerations.
EP H8: Building Heights	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the building heights of the proposals and is considered neutral in terms of equalities considerations.

Ravensbury Policies	Equalities Categories	Impact	Assessment
EP R1: Townscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the urban design, layout and massing of the proposals and is considered neutral in terms of equalities considerations.
EP R2: Street Network	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the street network and is considered neutral in terms of equalities considerations.
EP R3: Movement and Access	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy proposes the improvement of movement and access for vehicles, pedestrians and cyclists, which is likely to have a positive impact for all residents, including the elderly and disabled.
EP R4: Land Use	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The land use will remain as predominantly residential use with open space and re-provision of non-residential uses. Increased densities may be considered appropriate. Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision to meet the needs of all sectors of the community, in accordance with relevant National, local and London Plan policies. Development proposals will be expected to provide replacement homes and should include a mix of 1, 2, 3 and 3+ bed units, in a variety of house types to meet residents' individual needs. The policy will have a positive impact for all equality groups.
EP R5: Open Space	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy provides for the re-provision of the equivalent or better open space which is likely to have a positive impact for all residents, including the elderly and disabled.
EP R6: Environmental Protection	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy sets out a range of measures to ensure improvements in environmental performance including flood risk, energy efficiency and pollution during construction and operation. Central to the case for regeneration is the need to improve the environmental performance of the new dwellings on the estate compared with the existing homes, which will have a positive impact for all equality groups.
EP R7: Landscape	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the design of the landscape proposals and is considered neutral in terms of equalities considerations
EP R8: Building Heights	<ul style="list-style-type: none"> • Age • Disability • Race or belief 		The policy concerns the building heights of the proposals and is considered neutral in terms of equalities considerations

Sustainability Appraisal Findings

The assessment has shown that the regeneration will result in major positive impacts for the issues of housing, access to activities and social deprivation. Minor positive impacts are achieved for diversity and equality and education and skills.

The regeneration will enable existing and future housing needs to be met in terms of size and tenure, particularly affordable housing need.

The redevelopment will offer the opportunity to diversify the housing mix enabling a broader cross section of groups within the community to be catered for, including the young, elderly and vulnerable groups.

The provision of new community space and improved accessibility within the estates and to the wider area will help to promote community cohesion.

Regeneration is likely to have a positive effect on socio-economic inequalities, offering the opportunity for the education and skills of the population to be improved through the regeneration of the area and the potential increase in opportunities for training and new skills both in the construction and operation of the development.

The level of impact is uncertain at this stage with regards to health and wellbeing and services and facilities. The new accommodation is likely to improve the health and general wellbeing of residents as a result of more efficient, warmer, well-maintained homes. However, there will be significant disruption to residents as a result of the redevelopment. The phasing and decanting will need to be carefully considered to minimise adverse impacts upon residents.

An asbestos survey will also be required before any work is carried out as it is considered likely that there may be asbestos in several of the current structures.

The opportunity for new layouts within the estates that the regeneration will provide, should ensure that accessibility to and within the site is improved for all.

The sites are relatively well served by social infrastructure including schools, health, leisure and community facilities. An assessment of the impact of the increase in population upon the existing facilities will be required as part of the design process.

Impacts of The Regeneration Proposals

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

New affordable homes which replace the existing, will be covered by the current Nomination Agreement that ensures 100% of True Voids are made available as nominations to the Council. When the planning consents confirm that new affordable homes for rent will be provided (which are not replacements of existing affordable homes), the Council will need to negotiate and enter into a new supplementary agreement for nominations.

Negotiations have begun with CHMP on the use of void properties on the estate, especially those bought back from owners, with the intention of using them to help the Council with the discharge of its obligations to people that are homeless or in housing need.

Regeneration also provides an opportunity for CHMP to reduce overcrowding amongst its tenanted households. Overcrowding is proportionately more likely to affect households from the BAME community and so the regeneration provides an opportunity to address inequality in this area. Significant amenity and size improvements will be provided for residents, with all new homes built to current space standards with private outdoor space.

Some of the properties are in need of major structural works or can be expected to fail in the next few years. This is particularly important in respect of the Orlit houses in Ravensbury. Replacing or very major repairs to these properties will be required, probably during the anticipated life of the regeneration programme

The regeneration is an opportunity to provide new lifetime homes for all tenants, this will enable older tenants (and homeowners) to remain independent in their own homes for longer. New homes can be adapted to meet the specific needs of disabled residents, 10% of all new homes will be fully accessible and adaptable for wheelchair users.

However, it is acknowledged that the process of redeveloping the estates itself is likely to have a negative impact on older, disabled and vulnerable residents, due to the requirements to move house, potentially more than once, if temporary accommodation is necessary during the construction period.

CHMP has committed to designing the construction phases to minimise the need to “double decant” and where at all possible older, vulnerable or disabled tenants will only be asked to move once, straight in to a new home. Help will be provided to assist with such moves

Self-Build and Custom Housebuilding Act 2015

The Council has a number of duties under the Self Build and Custom Housebuilding Act 2015. One of these is to have regard to the entries on Merton's Self-Build register when carrying out functions relating to planning, housing, the disposal of land owned by the authority and regeneration.

It is not recommended to allocate sites for self-build and custom housebuilding as part of this Estates Local Plan. As an estates regeneration programme, the priority is rehousing residents who are already living on the three estates in new homes, built to modern standards, and providing new homes viably to meet housing need. This does not preclude self-build and custom housebuilding within any or all of the three estates as part of the delivery of the plan, should this be a viable option supported by the landowner.

Land Assembly

The estates each sit in different ways in relation to their surroundings, offering slightly different challenges in respect of retaining residents close to home during any temporary decant period. CHMP may need to assemble land to realise these opportunities.

If the current owners of sites that would prevent comprehensive and effective regeneration are resistant to sale, the Council will be asked to consider exercising its Compulsory Purchase powers. Property acquired in this way would then be sold to CHMP as part of the programme.

If a situation should arise where regeneration can only be delivered through use of those powers, then a separate and further decision will be required about whether to proceed. It is very important that such a decision should be subject to an equalities impact assessment in its own right at the time of the consideration. A decision to exercise such powers has not been made at this stage in the process.

CHMP's Proposals on the Delivery of the Estates Local Plan

The greatest impact on equalities will be the mechanics of the delivery of the Estates Local Plan including: the residents' offer; moving existing residents into new homes; addressing overcrowding; and minimising disruption during this extensive process. CHMP has undertaken an Equalities Analysis of their proposals and it is recommended that this is reassessed regularly during the regeneration delivery process.

Merton Council and CHMP Commitments

In order to address potential concerns for residents in relation to the regeneration of the Estates, the Council and CHMP signed up to the following commitments in September 2014.

1. Circle Housing Merton Priory will consult with residents, consider their interests at all times, and address concerns fairly.

CHMP's Response: In summer 2013 CHMP began consulting with residents of the estates about the possible regeneration of the three neighbourhoods. Consultation activities, including one-to-one meetings with individual residents, have taken place at each project milestone. The master planning process and development of the Residents' Offer have been supported by on-going exhibitions, workshops and drop-in events for all residents. Feedback is collated and used to inform further iterations of the master plan and design of the new homes. Every effort is made to show the correlation between residents' comments and the development of the designs with feedback presented at events, in newsletters and online.

In June 2015 an independent survey of all households was launched and the results were published on the website. All individual enquiries receive a personalised response from one of CHMP's regeneration managers. Other communication channels used to keep residents informed include:

- Letters and newsletters with dates of the new master planning events delivered to all households at the same time. These are available in large print or translation
- Posters and flyers to advertise events
- Ongoing dialogue with the Wimbledon Guardian
- A dedicated project website
- Briefings with ward councillors and local MPs

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 Circle Housing Merton Priory.

This is a particularly important consideration as it reflects the strong concerns of residents that they are not financially disadvantaged by the regeneration in assessing the financial structure of the proposals for CHMP.

CHMP's Response: The Residents' Offer is explicit on this matter and includes sections for resident homeowners and landlords. The former will receive market value plus 10% and the latter will receive market value plus 7.5%. Valuation, legal and relocation costs are also included.

Resident homeowners who wish to stay living in their neighbourhood after regeneration will be offered a replacement home with the same number of bedrooms as their existing home at no cost. They will own their home outright from when they move in and may only have to repay some or all of the difference between the replacement home and existing one, if they move within 11 years.

CHMP's 'early buy back' scheme gives homeowners the option to sell their home to CHMP on the same terms as above (not including the replacement home option) if they wish to move before the regeneration starts.

3. Current tenants will be entitled to be rehoused in a new home of appropriate size considering the number of people in the household.

CHMP's Response: The Residents' Offer published in May 2015 by CHMP, guarantees that current tenants will be rehoused in a new home of the appropriate size considering the number of people in the household. This will result in an increase in the number of habitable rooms being provided overall as none of the currently overcrowded households will be overcrowded in their new homes.

4. Existing Circle Housing Merton Priory tenants will keep all their rights and have the same tenancy agreement, including rent levels, in the new neighbourhood as they do now.

CHMP's Response: The Residents' Offer published in May 2015 by CHMP, guarantees that current tenants will keep all their rights, including tenancy conditions and the associated rent level, 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.

CHMP's Response: All new properties will be built to current energy standards and will be better insulated and easier to heat than those that they replace. CHMP's masterplan proposals and planning applications for early phases outside the masterplans will include details on the type of construction and energy strategies that will be in place to demonstrate this.

6. Circle Housing Merton Priory 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.

CHMP's Response: CHMP will keep disruption to a minimum by having workable decant and construction strategies in place. Housing needs of existing households will change over the course of the project and we will keep this under constant review. Wherever possible, existing residents will move directly into their new homes. If temporary housing is unavoidable CHMP will assist residents with their moves.

7. Circle Housing Merton Priory will offer extra help and support for older people and/or disabled residents throughout the regeneration works.

CHMP's Response: CHMP has committed to helping older and disabled residents throughout the regeneration works. This will include helping tenants and resident homeowners arrange and prepare for their move, arrange service and utilities connections, etc. If tenants or resident homeowners have any extra needs CHMP can offer

support or refer them to specialist services. Each neighbourhood will have dedicated staff appointed to help residents every step of the way to help make the move go as smoothly as possible.

The Residents' Offer promises to help residents / tenants 'arrange and prepare' for their move. CHMP will pay for removals including packing materials and a packing service. For older and vulnerable residents, CHMP will offer help with things such as re-hanging curtains and fitting lightbulbs, provided through a free handyperson service. If residents have any extra needs connected with their move, CHMP can offer support or refer residents to specialist services.

Extra help could include: Help with claiming benefits at the new address; help with changing electricity, water, phone and other utility supplies; advice about home aids and adaptations.

8. Circle Housing Merton Priory 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.

The Council will continue to work closely with CHMP, using the established system of performance reporting, to ensure that this commitment is met.

CHMP's response: CHMP is committed to ensuring that all homes across its stock including those identified for regeneration are maintained as per residents' tenancy and leaseholder agreements. Any repairs required will be remedied within the current contractual timescales in accordance with the nature and urgency of the repair. CHMP carries out independent quality checks of repairs undertaken and routine property checks will be ongoing throughout the regeneration programme.

Where it is mandatory CHMP will continue to ensure serviceable items are inspected and certified safe within the required periodic timeframe to ensure statutory and regulatory requirements are adhered to. In addition, periodic inspections and assessments will continue, with associated identified actions and or consequential works tracked and managed.

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.

This commitment is reflected in the Council's Estates Plan, which contains a thorough analysis of each neighbourhood. The Council's commitment in this area will need to be reflected in the planning applications made by CHMP.

CHMP's response: CHMP's regeneration proposals take into account the Council's Development Plan so that the growth in homes is proportionate, while addressing the borough's urgent need for high-quality new housing.

10. As a not for profit organisation, Circle Housing Merton Priory will not profit from any regeneration and will use any surplus to provide more housing or improve existing neighbourhoods.

This commitment will be monitored through the legal agreements between the Council and CHMP.

CHMP's response: As a not for profit organisation with a social purpose of enhancing life chances, Circle Housing invests any surplus back into building and maintaining homes and supporting communities.

Homeowners have raised concerns with the Council during Estates Local Plan consultations and throughout 2015 and 2016 about the residents' offer and in particular what "like for like" actually means. Whilst this is set out in the 2015 residents' offer, the Council has exercised its due diligence to residents in seeking clarification from CHMP on this important matter. CHMP has provided clarification as follows:

<p>Do resident homeowners get like for like?</p>	<p>The Residents' Offer details the Replacement Home Option, which is offered to those resident homeowners who were living on one of the three neighbourhoods on the 27th May 2015 (when the Residents' Offer was published). The Replacement Home Option confirms:</p> <ul style="list-style-type: none"> • If you are currently a freeholder you will be offered a freehold on your new property • If you are a leaseholder you will be offered a new 125-year lease on your new property • The new home will be at least as large as the home it replaces • Every Replacement Home will have private outdoor space • If you live in a house you will be offered a house, if a flat a new flat and a maisonette a new maisonette • The new home will have the same number of bedrooms as the existing home had when it was first built • There will be a Replacement Home for every resident homeowner who chooses to stay • They will be entitled to a £3,000 disturbance allowance
<p>If you are a freeholder now, will you be a leaseholder (and therefore liable for service charges) in the new development?</p>	<p>If you are a resident homeowner and a freeholder we will offer you a new freehold property.</p> <p>If you are a resident homeowner and a leaseholder we will be offering you a new 125 year leasehold at no cost and irrespective of how long you have to run on your current lease.</p>
<p>What circumstances will shared ownership or shared equity products be offered to resident homeowners? What circumstances are envisaged where these products will be offered to resident freeholders?</p>	<p>There is no shared ownership option (which involves paying rent on the part of the home owned by the Housing Association) in the Residents Offer.</p> <p>CHMP include a shared equity option (where no rent is payable) as a "safety net". This is to ensure that those residents who have a mortgage and for some reason are unable to transfer it to their new Replacement Home (perhaps because their circumstances have changed) will still be able to take up the offer of a new home and stay in their neighbourhood. In those circumstances we will meet the financing gap using shared equity. This helps us fulfil our commitment to provide a Replacement Home for any resident homeowner who chooses to stay and at no cost to them.</p> <p>Where one of CHMP's tenants exercises their Right to Buy after the 27th May 2015 (when the Residents Offer was published) CHMP will offer them a new home of the same size and typology on a shared equity basis.</p> <p>These are the only circumstances where shared equity is applied in the Residents' Offer.</p>

<p>Where will all resident homeowners live during the redevelopment process and who will pay for this?</p>	<p>CHMP will always try to move resident homeowners straight into their new Replacement Home, i.e. without the need to be temporarily housed. The phasing plans for all three neighbourhoods have been designed to accommodate this approach.</p> <p>For a small number of existing resident homeowners this may not be possible, for example as a consequence of their choice of location and its position in the phasing plan. CHMP may be able to offer a temporary Circle Housing home in their neighbourhood or another part of Merton, though this would need to be agreed with the London Borough of Merton who retain nomination rights as part of the 2010 Transfer Agreement.</p> <p>A disturbance payment of £3,000 will be available. Resident homeowners won't be charged rent as long as they agree to the terms set out in the Residents Offer regarding accepting the market value plus 10 per cent for their existing home, the value of the new home and the licence agreement for the temporary home.</p> <p>Anyone living in a temporary home for longer than one year will be entitled to an additional £3,000 disturbance payment.</p>
<p>Is "like for like" tenure; number of bedrooms; habitable rooms or house / flat?</p>	<p>The Replacement Home option means that if you live in a house which was originally built as a three bedrooomed house, then the Replacement Home will be a three bedrooomed house. The owner of a two bedrooomed flat will be offered a new two bedrooomed flat, etc. Every Replacement Home will be at least as large as the home it replaces.</p> <p>Every Replacement Home will have private outdoor space (i.e. a garden, balcony or roof terrace) irrespective of whether the original home had this or not.</p>

Potential Impacts of the Delivery of Estates Local Plan Upon Protected Characteristics

CHMP has undertaken an Equalities Impact Assessment as set out below:

Protected Characteristic	Positive	Negative
Race	<p>Consultation with all households on the three estates has helped to understand the current and future housing needs of the entire population of the estates. There is evidence that households from the BAME community on the three estates where regeneration is being considered are more likely to be overcrowded than all households on the estates.</p> <p>Regeneration deals with overcrowding within Circle's tenanted properties on the estates by rehusing each household in the right size property for them.</p> <p>Regeneration allows the opportunity to address issues of under and over occupation and this has been taken into account when formulating the proposed residents' offer.</p> <p>The regeneration proposals provide an opportunity to provide new good quality homes across a range of tenures (social affordable, leasehold, freehold and private rented sector). Good quality shared and public spaces are designed to feel safe and to encourage community cohesion. New homes will be safe, warm and economical to run.</p> <p>All existing CHMP tenants and resident homeowners will have the option to stay in their neighbourhoods if they wish to, this will promote community cohesion and build on the strength of the existing very diverse communities in the existing neighbourhoods.</p>	<p>Language barriers could limit the ability of some residents who are members of BAME communities to participate in ongoing consultation regarding their housing needs or their rights under the residents' offer.</p>
Religion/Belief	<p>Engagement with residents has been with a diverse range of religions and beliefs and has helped to understand and take account of their specific needs.</p> <p>For example, religious and cultural requirements for specific washing facilities and separate kitchens and living areas have become apparent and have been fed in to the detail regarding the design of new homes.</p>	<p>It is not considered that there will be a differential negative impact on persons of particular (or no) religion or belief as a result of the regeneration proposals.</p>

Protected Characteristic	Positive	Negative
Gender	<p>Better design through the regeneration could improve estate safety for everyone regardless of gender. There is no evidence that crime on the estates affects one gender more than others, however, personal safety and feeling safe is of particular concern to women and girls. Better design, including designing shared and open spaces to 'secure by design' principles can improve personal safety for everyone.</p> <p>The regeneration proposals provide an opportunity to provide new good quality homes across a range of tenures (social affordable, leasehold, freehold and private rented sector). Good quality shared and public spaces are designed to feel safe and to encourage community cohesion. New homes will be safe, warm and economical to run.</p> <p>The analysis of household composition within the lower super output areas for High Path and Eastfields indicate that there are proportionately higher numbers of households with dependent children headed by a single adult. From direct contact with these households CHMP is aware that these households are predominantly headed by women. Also that households with dependent children are more likely to be overcrowded. Regeneration will address overcrowding in CHMP tenant households by rehousing households, including overcrowded families, in homes of the right size for their needs.</p>	<p>It is not considered that there will be a differential negative impact on any gender as a result of the regeneration proposals.</p>
Gender Reassignment	<p>It is considered that there are no differential positive effects. Residents of the estates affected by gender reassignment will have the same opportunities to be consulted and to be provided with housing as other residents on the estates.</p>	<p>It is not considered that there will be a differential negative impact on persons affected by gender reassignment. Residents affected by gender reassignment will have the same opportunities to be consulted and provided with housing as other residents.</p>

Protected Characteristic	Positive	Negative
<p>Disability</p>	<p>Consultation and other data demonstrates that all three estates have residents with disabilities. Individual discussions with residents about their future housing needs would, once a decision to proceed is in place, allow CHMP to plan for the provision of lifetime homes and adapted properties for residents of household members with specific needs.</p> <p>A proportion of any new homes would be designed and built specifically to meet the needs of disabled residents. A better environment is also conducive to better mental health and wellbeing.</p> <p>Each of the three neighbourhoods has a number of households where one or more members of the household has a disability. There are few homes on each of the estates that were built specifically with the needs of people with disability in mind.</p> <p>Regeneration will allow CHMP to build all new homes to lifetime homes standards and 10% of homes will be adaptable to be fully wheelchair accessible. CHMP will be able to adapt new homes to the specific needs of individuals with disabilities and future housing will be much better tailored to the needs of disabled residents</p>	<p>There is the potential for residents with disabilities to find it more challenging to move home than residents without a disability due to the nature of their disability.</p>

Protected Characteristic	Positive	Negative
Age	<p>CHMP has consulted with all residents about their ambitions for future housing on their estates. There is the opportunity to provide the right type of housing for different households of all age groups.</p> <p>Engagement with older and younger residents will allow CHMP to take account of current and future housing needs when designing any future housing and to consider how to encourage understanding between generations.</p> <p>Coffee mornings have been held to allow older residents to discuss the proposals in a relaxed and informal environment.</p> <p>Abbey Primary school, which serves High Path estate held the first of a proposed series of annual regeneration weeks, which focussed on the children's ambitions for the potential new neighbourhood, energy efficiency and environmental issues.</p> <p>The regeneration plans are for households to be housed according to their needs. The evidence is that families with dependent children on the three estates are more likely to live in overcrowded conditions than other families in the surrounding area.</p> <p>Each of the proposed regeneration estates has a proportion of older residents who are CHMP tenants and resident homeowners. Older residents have participated in the consultation and their views have been taken into account in the design of the masterplans and the homes. A number of older residents have expressed concerns about moving home when it is their turn to move to their new home. The residents' offer sets out the help that will be provided to older residents, supporting them through their move by providing a named contact person to support them through their move, a removal, packing and unpacking service and a handypersons service to help with small jobs once they move into their new home.</p>	<p>There is the potential for both older and vulnerable residents to be worried about change and the impact on them, or to find it more challenging to move home. There is also the potential for older residents not to participate or to refuse to or worry about giving candid feedback.</p>

Protected Characteristic	Positive	Negative
Pregnancy and Maternity	Residents affected by pregnancy and maternity will have the same opportunities to be consulted and to be provided with housing as other residents.	It is not considered that there will be a differential negative impact on pregnant women as a result of the regeneration proposals.
Marriage/Civil Partnership	It is considered that there are no differential positive impacts. Married and residents in a civil partnership will have the same opportunities to be consulted and provided with housing as other residents on the estates.	It is not considered that there will be a differential negative impact. Married and residents in a civil partnership will have the same opportunities to be consulted and provided with housing as other residents.
Sexual Orientation	It is considered that there will be no differential positive impacts. Residents with a particular sexual orientation will have the same opportunities to be consulted and provided with housing as residents with other sexual orientation.	LGBT residents may feel uncomfortable speaking about their household composition or future housing needs, which may lead to them not being suitably housed in the regenerated estates.

CHMP Consultation on the Proposals

Opportunities have been provided for all CHMP tenants, resident homeowners (leaseholders and freeholders) and non-resident property owners on the three estates to be consulted about the future of the neighbourhoods.

Consultation has been carried out on the principle of the regeneration and on the details of the Residents' Offer to CHMP tenants, resident homeowners and non-resident homeowners and the proposed regeneration masterplans for the Estates.

All of the venues for consultation events were accessible, materials used were portable and could be moved for ease of access, use and interpretation. Where requested regeneration officers carried out home visits to residents and non-resident homeowners at times convenient for them so that they could see the materials including plans and resident offer information so that those who could not attend the consultation events for any reason were able to give their views.

Consultation and communication materials were provided in large print and translated formats for those who requested them, where it was known that translations were needed the information was provided in alternative formats as a matter of course for subsequent consultations and communications.

A market research survey was undertaken by Member Engagement Services in June / July 2015 and was undertaken using a professional translation service where necessary. Specific appointments were arranged for vulnerable residents to meet with MES where they could be accompanied by a carer, support worker or friend whilst they gave their views to the MES researcher.

CHMP Management

Circle Housing is implementing a programme across the group of amalgamating the individual housing associations within the group into one large association. Circle see this process known as 'Resurgence' as a key means of achieving greater efficiency and effectiveness and as necessary to ensure, regeneration schemes such as the one proposed in Merton, can be delivered. In Merton this would result in the disbandment of the CHMP Board and the creation of a local Community Panel. Negotiations are underway regarding the establishment of a local Community Panel specifically for Merton residents.

CHMP Phasing and Decanting Strategy

CHMP has provided the following information regarding their approach to the delivery of the Estates Local Plan. The tables overleaf outline the proposed Decant and Construction phasing for each estate due for regeneration. The current programme runs from 2016 through to 2029. It is important to note that phases are subjected to residents' consultation and planning permission being granted and may therefore change.

Due to the nature of the phasing structure and the high percentage of leaseholder/freeholders units included within the regeneration programme, blocks within each phase are likely to change. It is therefore not possible to programme decants and demolitions in accordance with the yearly decent homes failures, however a mitigation plan to manage this has been put in place.

Circle Housing is committed to ensuring that all homes across its stock including those identified for regeneration are maintained as per residents' tenancy and leaseholder agreements. Any required repairs will be remedied within the current contractual timescales in accordance with the nature and urgency of the repair. In addition, Circle carry out independent quality checks of repairs undertaken and routine property checks will be ongoing throughout the regeneration programme.

Where it is mandatory Circle Housing will continue to ensure serviceable items are inspected and certified safe within the required periodic timeframe to ensure statutory and regulatory requirements are adhered to. In addition, periodic inspections and assessments will continue, with associated identified actions and or consequential works tracked and managed.

Estate services such as cleaning and grounds maintenance will continue at each block until all residents are fully decanted, the current service schedules and scope of work will be the standard set within the current contract and in line with service charge cost. The standards of cleaning and grounds maintenance are monitored by Circle via periodic estate inspections and resident feedback.

Eastfields Estate - 470 Units (247 General needs)

Phase	Block	Number of units	Decant Date	Construction Date
1	Non- residential	N/A	N/A	2018/19
2	70 -110 Clay Ave	42	March 19	Mar 2019-Apr 2021
	47 – 57 Pains Close	16		
3	63 -68 Clay Av	6	November 2020	Nov 2020 – Dec 2022
	9-44 Pains Close	44		
	3 – 42 Potter Close	44		
4	22-62 Clay Ave	42	August 2022	Aug 2022 – Aug 2024
	13 – 44 Moore Close	32		
5	112- 128 Clay Ave	18	August 2023	Aug 2023 – Mar 2026
	10-36 Mulholland Close	36		
	Thrupp Close	44		
6	34 -90 Acacia Road	30	October 2025	Oct 2025 – Sep 2027
	1-20 Clay Ave	16		
	3-12 Moore Close	20		
7	92-190 Acacia Road	48	February 2027	Feb 2027 – Apr 2029
	37-61 Mulholland Close	32		

High Path Estate – 573 Units (365 General needs)

Phase	Block	Number of units	Decant Date	Construction Date
1	Non- residential	N/A	N/A	2017/18
2	Lovell house	11	May 2019	May 2017- May 2019
	Marsh Court	64		
	Pincott Road	6		
	Priory Close	59		
3	Becket Close	23	May 2021	May 2019 – Aug 2023
	Dowman Close	17		
	Gilbert Close	19		
	Hayword close	15		
4	Deburgh House	22	May 2023	April 2021 – May 2023
	Doel Close	10		
	Hilborough Close	16		
	Norfolk house	28		
	Vanguard House	11		
	Will Miles Court	17		
5	Hudson Court	64	February 2025	Feb 2023 - Feb 2025
	Merton Place	14		
	Mychell House	7		
	Ryder House	37		
	Tanner House	21		
6	Eleanor House	21	August 2027	Aug 2025 – Jan 2028
	May Court	64		
	Ramsey House	27		

Ravensbury Estate – 122 Units (93 General needs)

Phase	Block	Number of units	Decant Date	Construction Date
1	66-70 Ravensbury Grove (evens)	3	December 2016	Dec 2016 – Feb 2018
2	227-241 Morden Road (odds)	8	August 2018	Aug 2018 – Jul 2020
	Rutter Gardens	12		
	36-56 Ravensbury Grove (evens)	13		
3	Hatfield Close	37	August 2019	Aug 2019 – Aug 2021
	211-225 Morden Road (odds)	8		
	20-34 Ravensbury Grove (Evens)	10		
4	171-209 Morden Road (odds)	22	October 2020	Oct 2020 – Dec 2023
	2 – 16 Ravensbury Grove (evens)	9		