

Statement of Consultation Submission

Pre-Submission Estates Local Plan

March 2017

London Borough of Merton

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1. PART 1: NARRATIVE

1.1. Introduction

This document sets out how the London Borough of Merton complied with the consultation requirements of Merton's Statement of Community Involvement (SCI) 2005 and the Regulations (The Town and Country Planning (Local Development) (England) (Amended) Regulations 2012) by engaging, involving and consulting with, residents groups/organisation and stakeholders of the Eastfields, High Path and Ravensbury estates during the preparation of the Draft Estates Local Plan (part of Merton's Local Plan).

Regulation 22 (1) (c) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 requires the local authorities to prepare a Statement of Consultation setting out:

- which bodies and persons the local planning authority were invited to make representations (under regulation 18,)
- how those bodies and persons were invited to make representations under either of those regulations,
- a summary of the main issues raised by the representations made pursuant to either of those regulations, and
- How any representations made pursuant to either of those regulations have been taken into account.

The Statement of Consultation will assist the Inspector at the Examination in Public (EIP) in determining whether the Council's Submission Estates Local Plan complies with the minimum requirements for involvement and government guidance.

1.2. Merton's Statement of Consultation (SCI)

Merton's Statement of Community Involvement (SCI) was adopted in 2006 and describes how the community can be involved in preparing Merton's Local Plan.

The SCI is part of the Local Plan and sets out the council's commitment to community involvement in planning. It explains how Merton's local communities, residents groups/organisation, stake holders and other interested parties can be

involved in developing planning documents, by informing the Council what they thought, provide additional information and suggest changes to policies/plan. The SCI also shows how different Local Plan documents will be prepared and how the Council will notify the public about them.

Some issues raised in the SCI have changed since the SCI was adopted in 2006. For example the council now has a Facebook and Twitter page which is used as an additional method of alerting people to new press releases. Another example is that the council no longer has a dedicated community engagement officer for planning matters but uses all officers involved in plan making to conduct outreach consultation. These are not considered to be significant changes to the principles of the SCI. The tables in Part 2 of the Statement of Consultation outline the methods of consultation identified in section 4 of the SCI and the methods of consultation that were utilised during the various consultation stages of the Estates Local Plan. This statement reports on the engagement during the consultation stages, feedback received from the public and the steps the Council took following the feedback; before submission of the Estates Local Plan to the Secretary of State in 2017.

1.3. Summary of consultations undertaken

The council has been engaging with local residents, resident's groups/organisations, key stakeholders and other interested parties since 2014. The engagement has focused on understanding the type of regeneration they would like to see on the three estates (Eastfields, High Path and Ravensbury). The options provided were:

Option 1 – Refurbishment to Decent Homes (Merton Standard)

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

Option 2 – Refurbishment to an Enhanced Standard;

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

Option 3 – Full Redevelopment (*Eastfields and High Path*)

Demolition of all existing properties on the Estates and redevelopment of the sites to deliver new modern, energy efficient and high quality homes (up to 700 on

Eastfields and 1,400 on High Path), alongside a new community space, open space, landscaping and car parking.

Option 3 – Partial Redevelopment (*Ravensbury*)

Refurbish existing properties owned and managed by Clarion Housing Group 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.

The 'do nothing' opinion was not considered a reasonable alternative for any of the three estates. The Stock Transfer Agreement between Clarion Housing Group and the council legally required that Clarion Housing Group refurbish the properties as a minimum. In addition, Clarion Housing Group committed to improving the quality of life to its tenants.

The options listed above were part of the Case for regeneration that was prepared by Savills on behalf of Clarion Housing Group. This document was published in September 2015 and updated in September 2016.

The partial regeneration of Eastfields and High Path was not considered to be a viable option as the division of the estate into the refurbished and redeveloped part would not be straightforward due the location of the worst performing homes or maximise land use on the site.

The full regeneration of the Ravensbury Estate is not considered to be a reasonable alternative. The Orlit Housing on the estate provides an exception set of circumstances at the site. The Orlit housing has been classed as defective under the Housing Defects Act 1984 which is not part of the Housing Act 1985.

As a result of their status the majority of UK mortgage providers will not lend against them, it is difficult to get insurance and Clarion Housing Group face difficulties in obtaining securitisation on Orlit properties.

The homes on the eastern portion of the site are not Orlit constructed. They have good separation distances between them and other properties on the estate. They will not be redeveloped. There is an opportunity for refurbishment which will be finalised between Clarion Housing Group and the residents.

The homes on the western part of the site are Orlit constructed and have predominantly Clarion Housing Group tenants. This part of the site will be redeveloped.

The options set out above have been assessed against the revised SA framework.

The council also requested views and comments on a number of areas for example the provision of green space on the estates, transport and parking, building heights for the estates, connectivity on the estates and community facilities. All the comments received informed and influence the development of the Plan from the Issues and Options stage to submission. The next sections in this statement gives further details on the methods of consultation used each stage of the Plan.

The council's consultation is completely separate and independent from the consultations which have been conducted by Clarion Housing Group on the proposed regeneration of Eastfields, High Path and Ravensbury Estates.

The community engagement was undertaken by Clarion Housing Group on the regeneration master plans for the three estates. This engagement spanned from July 2013 to December 2016. Merton Council liaised with Clarion Housing Group to ensure, where possible that a coordinated programme of community engagement to help minimise consultation confusion and fatigue.

The responses received provided invaluable input into the council's Estates Local Plan as well as guidance on the next steps.

1.4. Stage 1: Issues and Options Draft Estates Local Plan (September – November 2014)

This stage provided stakeholders with their first opportunity to advise the council directly what they wanted to see at the estate.

This stage of consultation was extended twice and exceeded the statutory consultation requirements. This gave more people an opportunity to respond to the consultation. It also ensured that more outreach work was carried out between officers and various residents groups / organisation and local community was the council's initial public consultation to ask people and organisations to suggest options that they felt the Draft Estates Local Plan should cover. Following this consultation, officers assessed the responses and carried out research to inform the council's Draft Estates Local Plan

Using background research, responses from the council's public consultation in September – November 2014 and other key considerations (e.g. national and regional planning policies) the council has drafted the Draft Estates Local Plan to guide any regeneration proposals that may come forward for the three estates.

1.5. Stage 2: Planning ahead: Draft Estates Local Plan, preferred options (February - March 2016)

The feedback from the 2014 consultation was reviewed in line with national regional and local planning policies and guidance. The council then prepared the draft Estates Local Plan which consists of the following sections:

- Part 2 provides a background setting out the key drivers, the case for regeneration, the design principles and the council's vision for each of the new neighbourhoods.
- Part 3 looks at each estate neighbourhood in turn. It proposes a set of detailed policies to guide development. This is informed by a study of the historic context and site analysis of the current estates.
- Part 4 sets out requirements for design codes to guide development and ensure design consistency on each estate and every phase of development.
- Part 5 sets out how the Plan will be expected to be delivered and implemented.

1.6. Stage 3 Pre-Submission Estates Local Plan (December 2016 – January 2017)

This consultation gave the public, key stake holders and other interested parties a final opportunity to comment on any issues within draft Estates Local Plan that they would like the inspector to consider at the examination of the plan. The public were also informed of their opportunity attend the inspector hearings and were informed to notify the council if they wished to attend.

1.7. How we consulted

During all stages of consultation for the Draft Estates Local Plan, the council used different methods of public engagement and consultation to maximise public involvement and raise public awareness of the Draft Estates Local Plan. These consultation methods included:

- Resident Groups/Organisation/Civic Groups/ meetings
- One-to-One Meetings with Selected Stakeholders

- Steering and Advisory Groups
- Access to the document(s) at Merton's reference libraries
- Formal written consultation notification letters and emails to people and organisations who were involved locally or had asked to be involved (e.g. more than 4000 letter and email sent at Pre-Submission stage)
- Dedicated webpage on Merton Council website (update at various intervals)
- Responses and comments submitted made available on the councils dedicated website.
- Public notice in the borough's local newspapers

More details about the range of consultation methods used at every stage are set out in Part 2.

2. PART 2: HOW THE CONSULTATION WAS CARRIED OUT

2.1. Stage 1: Issues and Options (September - November 2014)

Stage 1	
Consultation methods advised in Merton's adopted SCI 2006	Consultation methods used
Press release: local press	A local advertisement was placed in Wimbledon Guardian newspaper on 25 th September and 9 th and 23 rd October 2014.
Council website or associated / relevant websites.	Details of the consultation were placed on the Council's public accessible under the Estates Plan consultation portal which is specific to the regeneration project. It explains what the consultation what about, how to submit comments with contact email address and telephone if there was any questions.
Leaflets on the proposal	The Council produced leaflets which promoted the drop in sessions for the public and other interested parties. These were available from Merton's reference libraries and Civic Centre.
Outreach	<p>Listed below are the meetings held with the estates residents and council officers, informing them of the Plan, explaining the next stages and answering questions they had relating to the development of the estates.</p> <p>High Path residents meeting 15th October 2014 held at the Merton Civic Centre in the evening.</p> <p>Eastfields Residents meeting held on 10th November 2014 Estate</p>
Direct mailing	The Council direct mailed the estate residents and stakeholders

	High Path Estate 6908 Eastfields Estate 3654 Ravensbury Estate 1673 Stakeholders 35 (letters and emails).
Dedicated phone and email	The Council publicised a dedicated Estate Plan telephone number for the public to call if they had any questions regarding the consultation (including translation and large print copies)
Attending Area Forums	Officers attended a number of the Area Forum meetings regarding planning issues Raynes Park Community forum which was held during the consultation period on the 30 th September 2014 however, the Plan was not an agenda item.

2.2. Responses Received

The first stage of public consultation (Issues and Options) was carried out between September and November 2014. The council sought opinions on what the plan should cover and the priorities for the neighbourhood. The short (16 question) survey focused on the strategic planning principles:-

- Type of regeneration
- The type of home / dwelling
- The type of open space and play space
- Building Layout Public Transport
- The need for community facilities and
- Support for businesses

An analysis of the responses follows.

2.3. EASTFIELDS - ISSUES AND OPTIONS

A total of 477 letters were sent out to residents within the estate. The total number of responses received was 101. A summary of the data is presented in this document.

Question 1: Should all the homes on the Eastfields Estate be redeveloped?

Question 1 sought to understand the **appetite for regeneration** within the estate. The question read as follows: '**Should all the homes on the Eastfields Estate be redeveloped?**' The question was a multiple choice one with a choice of four answers as follows:

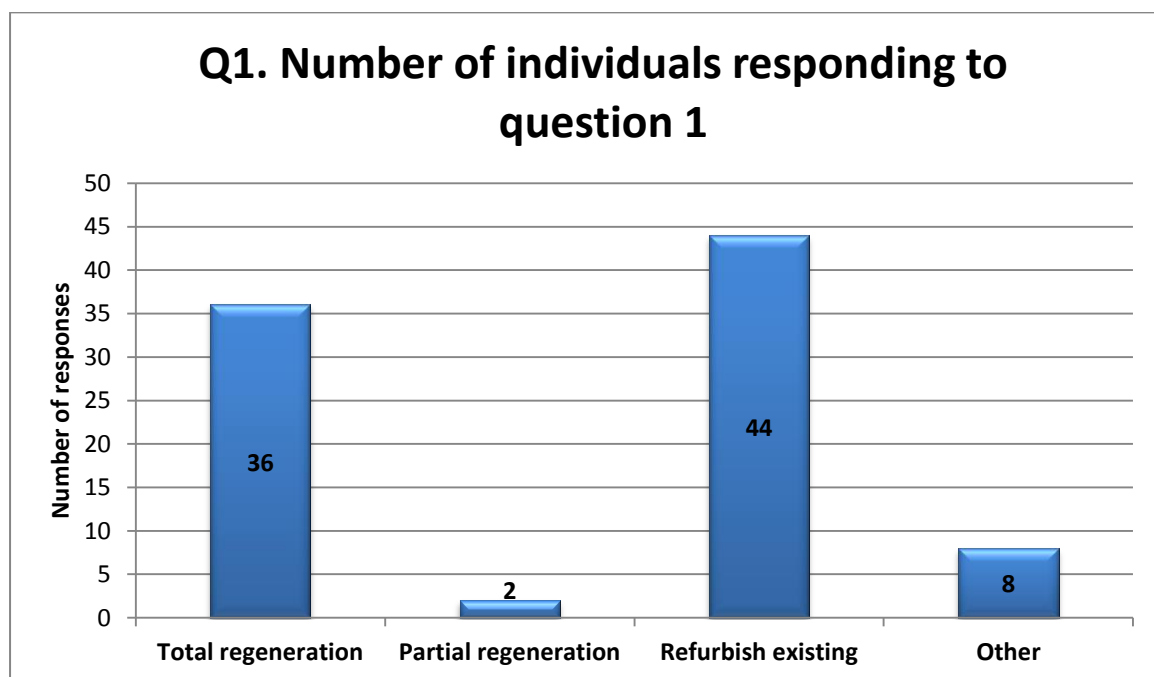
Option 1: Demolish and redevelop the entire Eastfields Estate

Option 2: Partial redevelopment

Option 3: Invest in existing properties to bring them to minimum modern standards

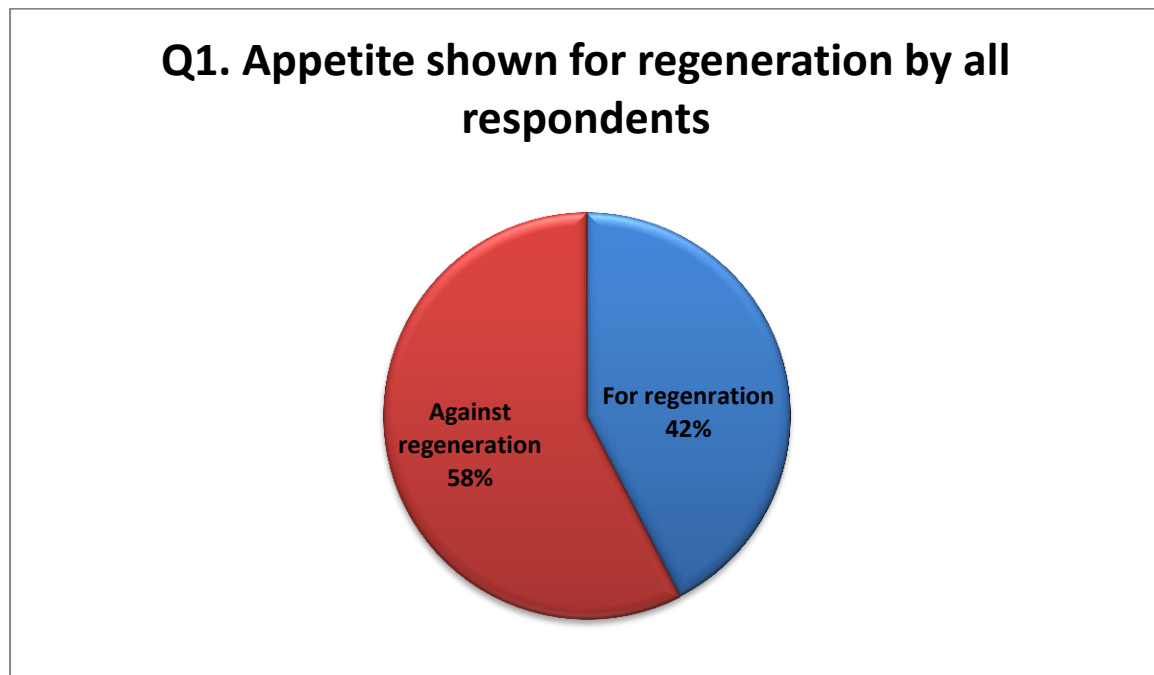
Option 4: Other

The responses to this question are shown in the bar chart below. It is noted that not all responses had the specific question answered, whilst some responses did not take the form of the questionnaire. Any difference between the total number of responses received and the total responses to question 1 below is due to a non-response to question 1.



Option 4 gained 8% of the responses, whilst 11 people did not explicitly answer the question. The respondents that selected option 4 generally fell into those people who want to see refurbishment at no cost to residents (option 3 requires a cost for all leaseholders) and those people who would like to see no changes to the estate. Some were undecided. In some instances, the respondents who did not explicitly answer question 1 have, upon further analysis, provided an idea of whether they would like to see refurbishment or not. The pie

chart below shows whether people are in favour of regeneration (partial or complete) or not. The figures relating to 'for regeneration' have been reached by adding together those who selected options 1 and 2, as well as any responses which had selected 'other' but upon further analysis would indicate a desire for some regeneration. The 'against regeneration' data consists of those who selected the 'refurbish only' option, and those who selected the 'other' option but upon further analysis indicated a resistance to regeneration.



The chart above demonstrates a relatively even split between those wanting to see regeneration of the estate, and those who do not.

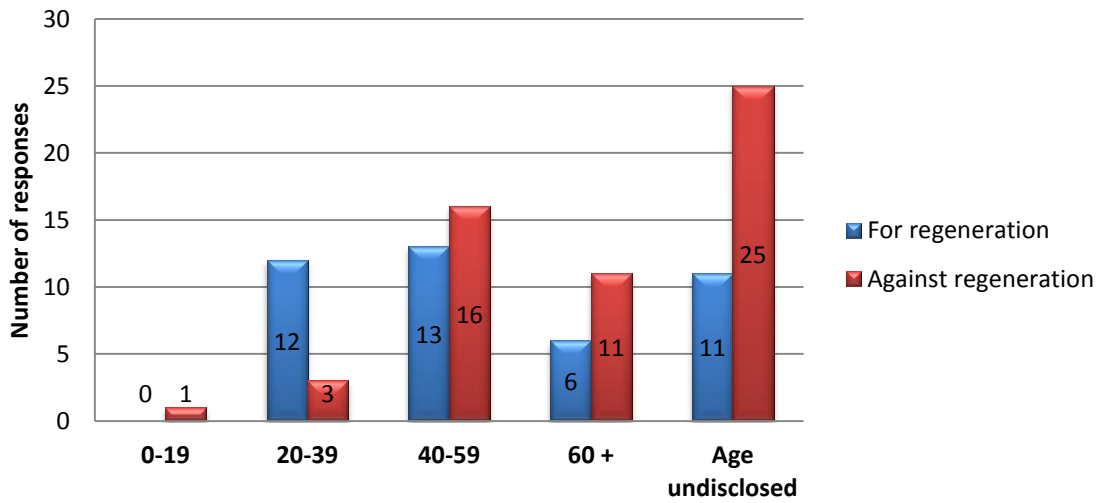
There are a number of factors which could influence the selection made by respondents. Among these are age and tenure. The following charts and graphs explore these in more detail.

Age:

	Total regeneration	Partial regeneration	Refurbish existing	Other	Total
0-19	0	0	1	0	1
20-39	12	0	3	3	16
40-59	10	1	10	5	26
60 +	5	1	10	2	18
Age undisclosed	9	0	20	0	29

As with the overall data, the numbers of responses to question 1 result in less than the total number of responses. The chart below shows whether people support regeneration of the estate, having further analysed the responses of those who selected option 4 and those who did not select an option.

Q1. Views to regeneration of the Eastfields Estate by age

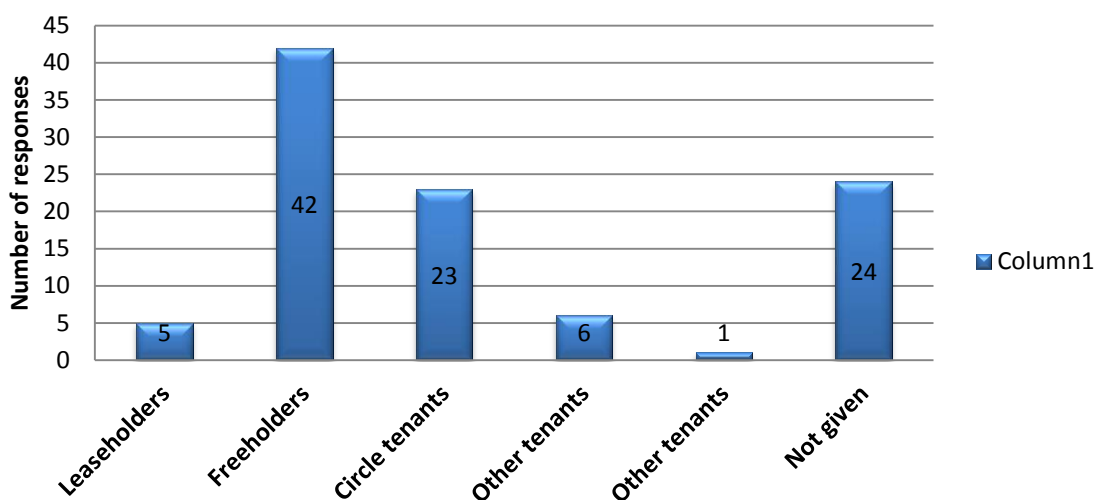


The above chart demonstrates greater desire among younger residents to see regeneration happen on the estate. The evident trend in the data is that the desire for regeneration decreases significantly among the age groups.

Tenure type:

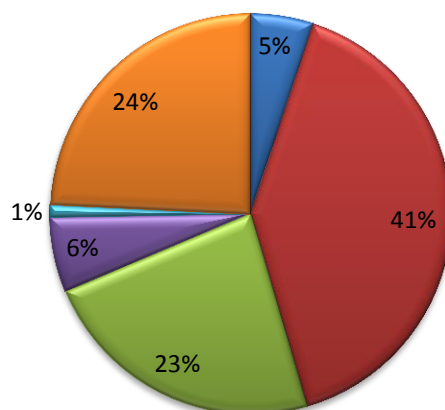
The tables and charts below explore the Responses to question 1 by tenure type. The 'other' category relates to other interested parties/bodies.

Q1. Number of responses received by tenure type



Q1. Proportion of responses by tenure type

■ Leaseholders ■ Freeholders ■ Circle Tenants ■ Other tenants ■ Other ■ Not identified

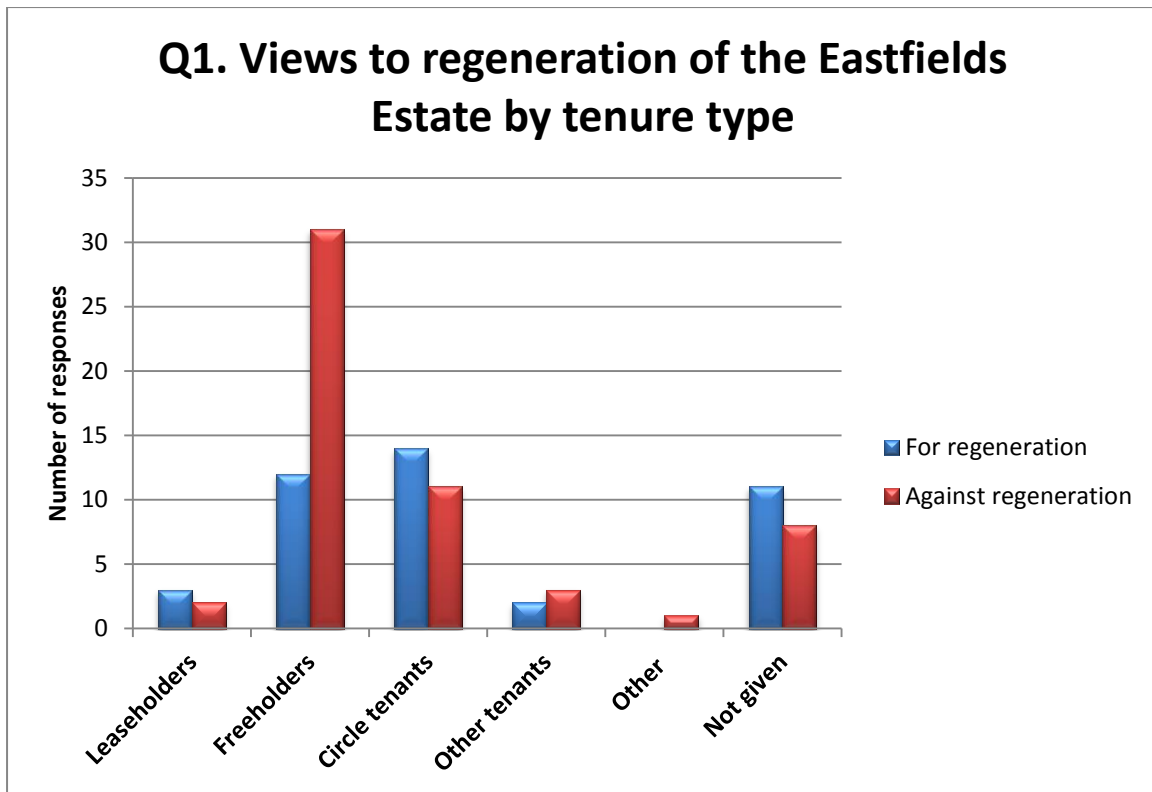


The data above shows that nearly half of all responses came from Freeholders. Circle tenants make up less than a quarter of all responses. 24% of respondents did not identify their tenure.

The table below shows the breakdown of selections by tenure type.

	Total regeneration	Partial regeneration	Refurbish existing	Other
Leaseholder	3	0	2	0
Freeholder	12	0	22	3
Circle tenant	8	2	9	3
Other tenant	2	0	3	1
Other	0	0	1	0
Not given	11	0	7	1

The chart below shows whether people support regeneration of the estate, having further analysed the responses of those who selected option 4 and those who did not select a specific option.



Question 2: What size of homes should be provided within the Eastfields estate?

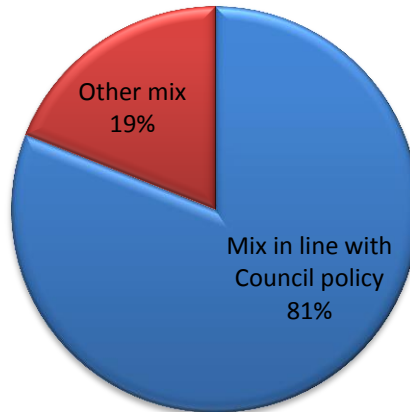
Question 2 seeks to understand the **size** of homes that people would like to see on the Eastfields Estate. The question provides two options as follows:

Option 1 - mix of different size of homes: provide a mix of different size of homes consisting around 33% one bedroom, 32% two bedrooms and 35% three or more bedroom homes. This option reflects Merton's current policy to encourage a mix of dwelling sizes.

Option 2 - If you do not agree with this mix, how would you change it?

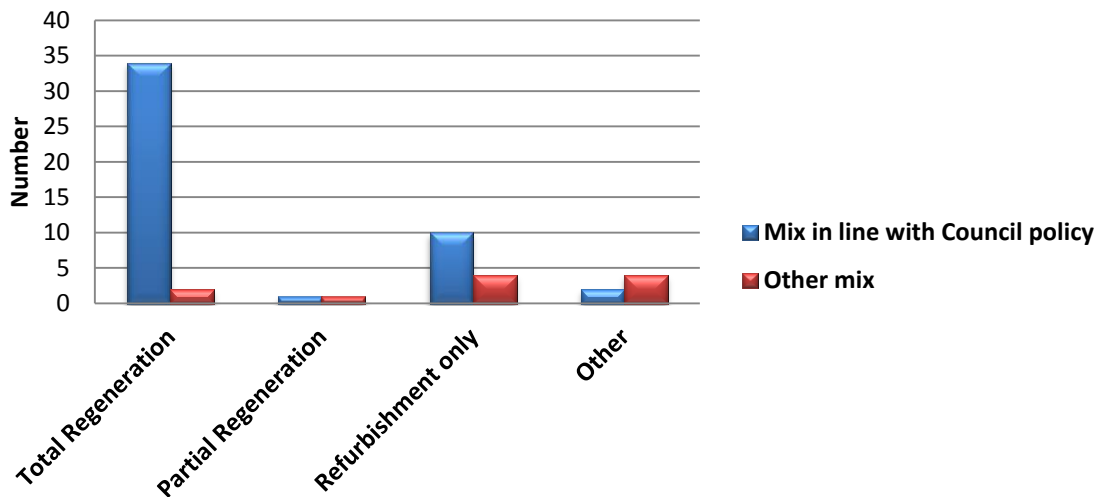
The Pie chart below shows which option respondents selected.

Q2. What mix of dwelling size should be on the Estate?



It is worth noting that respondents were encouraged to answer all questions, even if their answer to question 1 was not in favour of regeneration. The following bar chart shows the size of property wanted by respondents based on how they feel regarding regeneration.

Q2. Mix of size of homes people want by attitude to regeneration



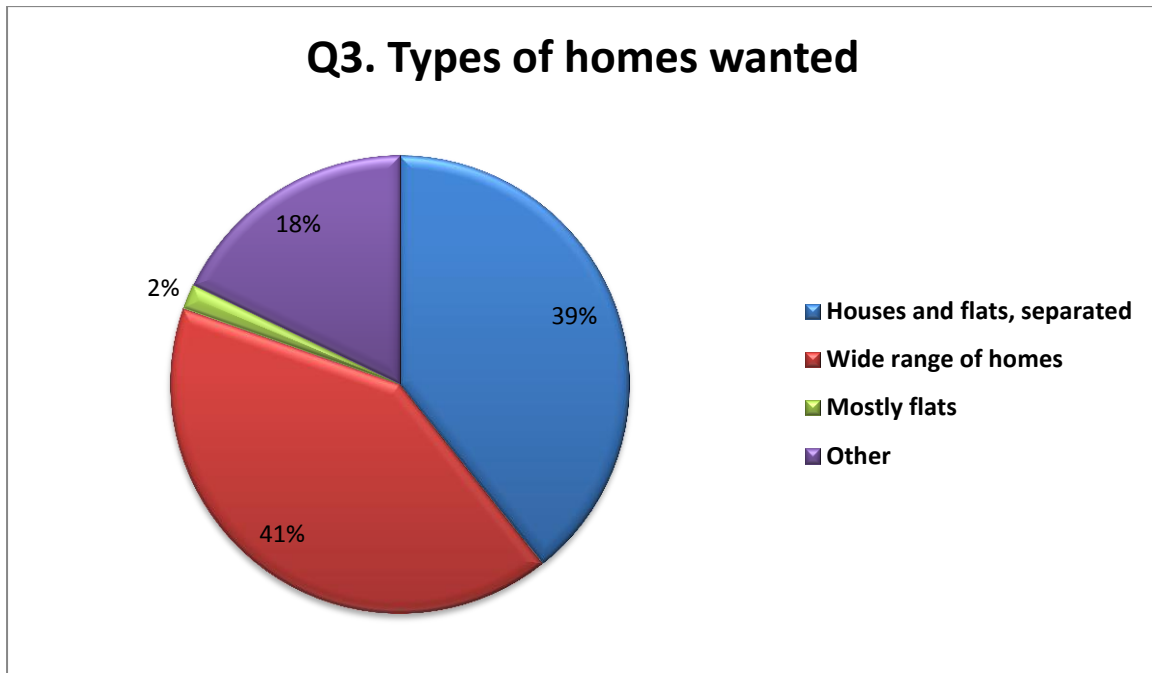
It is noted that more than three quarters of respondents chose a mix of housing size in line with the Council's policies, and this view was broadly shared across those who sought regeneration of any sort and those who selected the refurbishment only option. Those who had selected 'other' for type of redevelopment sought bucked this trend with most respondents wanting things to be left as they are.

Question 3: What type of homes should be provided across the estate?

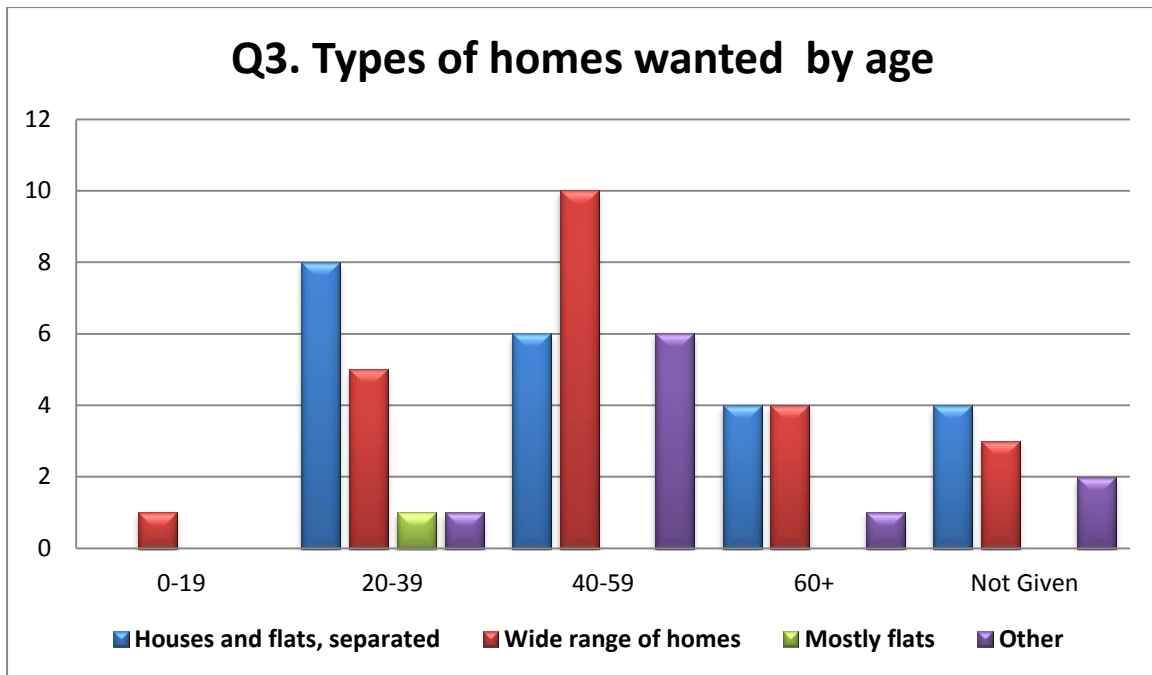
Question 3 seeks to understand the **types** of homes that people feel should be provided across the Eastfields Estate. This question had four possible options as follows:

- 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, please state

The following pie chart shows how people responded to this question.



The following bar chart breaks the above information down by age of respondents.



There is a fairly even split between respondents who opted for a mix of dwelling types across the estate, and those who wish to see house and flats in separate parts of the estate. Of the respondents who chose the 'other' option, the most common opinions given were to leave the estate as is, and some wish to see the provision of houses only.

Question 4: How should building heights be distributed through the Eastfields estate?

Question 4 tries to identify what **height** buildings on the Eastfields Estate should be. This question had a range of choices as follows:

Option 1 - Evenly across the estate

Option 2 - Taller buildings around the edges. This option has three sub options as follows:

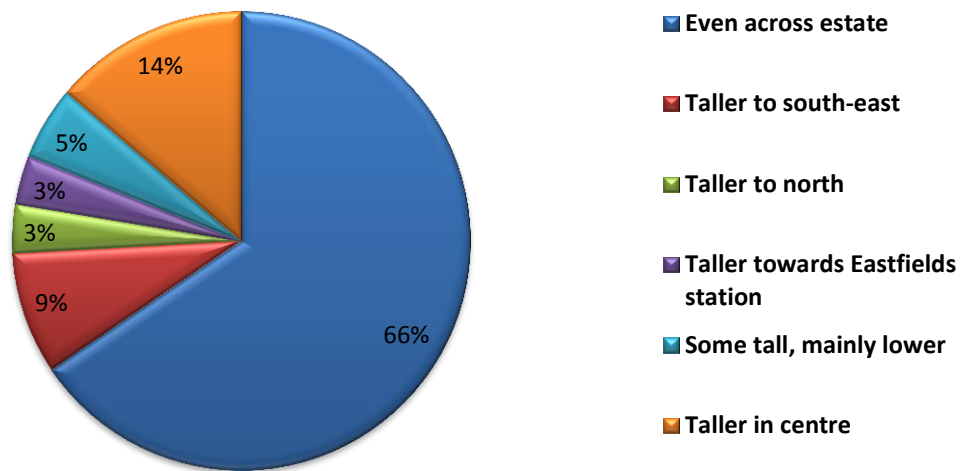
- a) taller buildings fronting the cemetery to the south-east
- b) taller buildings fronting the school to the north
- c) taller buildings towards Eastfields train station

Option 3 - Variety across the estate. This option had two sub options as follows:

- a) some taller buildings evenly spread across the estate in general, amongst mainly lower buildings
- b) taller buildings towards the centre of the site

The pie chart below shows how people responded to this question.

Q4. Heights of buildings wanted



Nearly two thirds of respondents have opted for building heights to be even across the estate. The next most popular choice was for taller buildings towards the centre of the site, gaining 14% of the respondent's choice.

Question 5: Are there any other issues or options we should consider regarding new homes?

Question 5 provided space for free text regarding thoughts on **other considerations regarding new homes**. The most common issues raised are as follows; consider communal areas, larger room sizes, low rise buildings, energy efficiency, private gardens and security.

Question 6: What type of outdoor space would you prefer to see within the estate?

Question 6 looks at the **types of outdoor spaces** that respondents would prefer to see within the Eastfields Estate. Three options were provided, as follows:

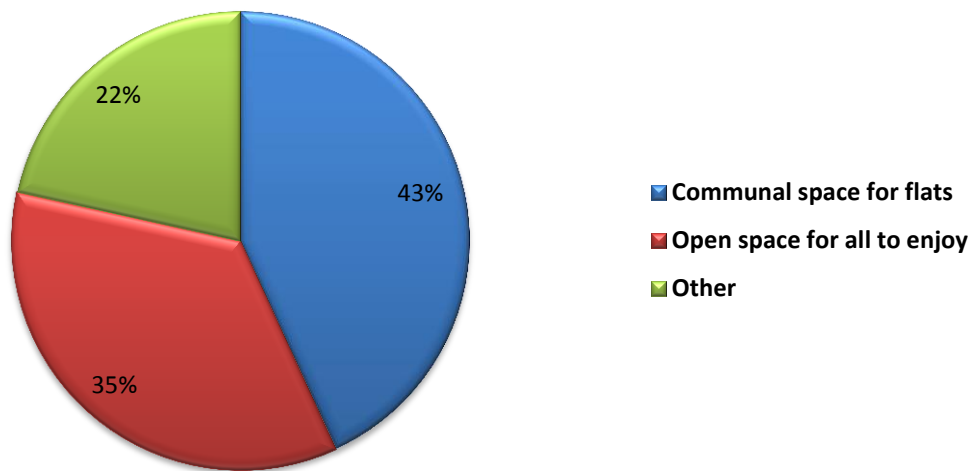
Option 1 - Concentrate on providing communal space for flats

Option 2 - Provide a single public open space for everyone to enjoy

Option 3 - Other, please state

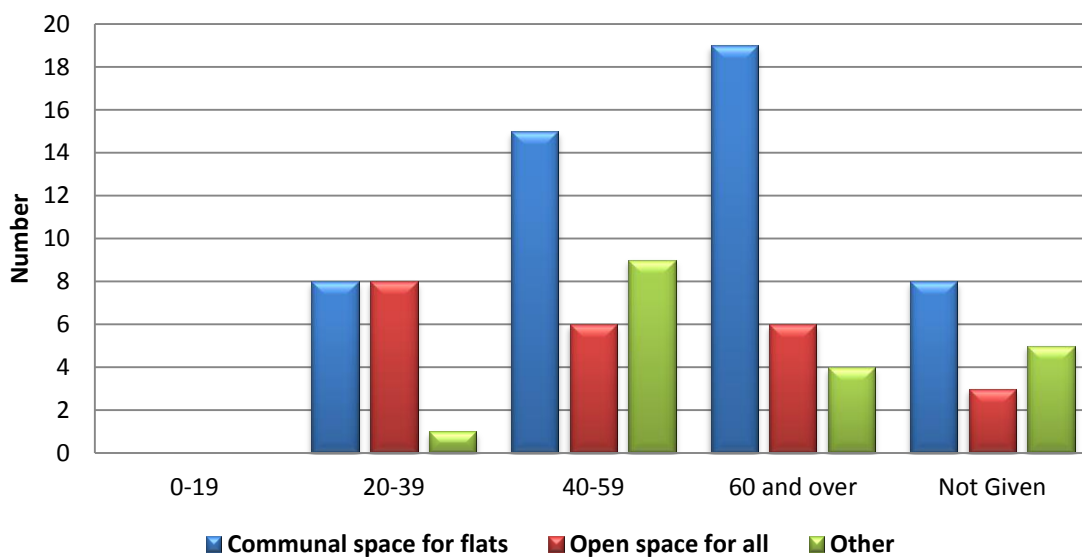
The bar chart below show how people responded to this question.

Q6. Type of outdoor spaces sought



The following bar chart breaks the above information down by age of respondents.

Q6. Type of outdoor spaces wanted



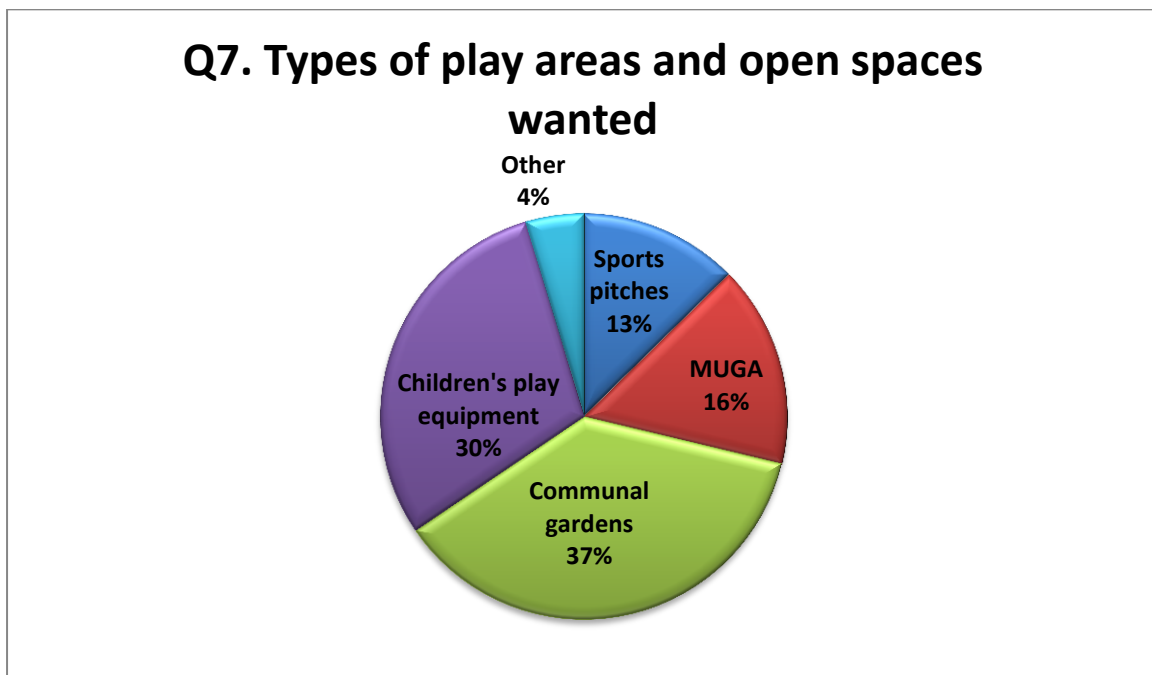
There was a relatively close split between those who want communal areas for flats (43%) and those who want open spaces for all to enjoy (35%). The 20-39 year old respondents were split 50/50 in relation to these options. 22% of respondents selected 'other' with some of the most common requests being for things to be left as they are. Some respondents did not elaborate.

Question 7: What types of play areas and outdoor space would you prefer to see?

Question 7 asks what **types of play areas and open spaces** people would like to see within the Eastfields Estate. This question provides five options, and specifies a maximum of two choices per respondent. The choices given are as follows:

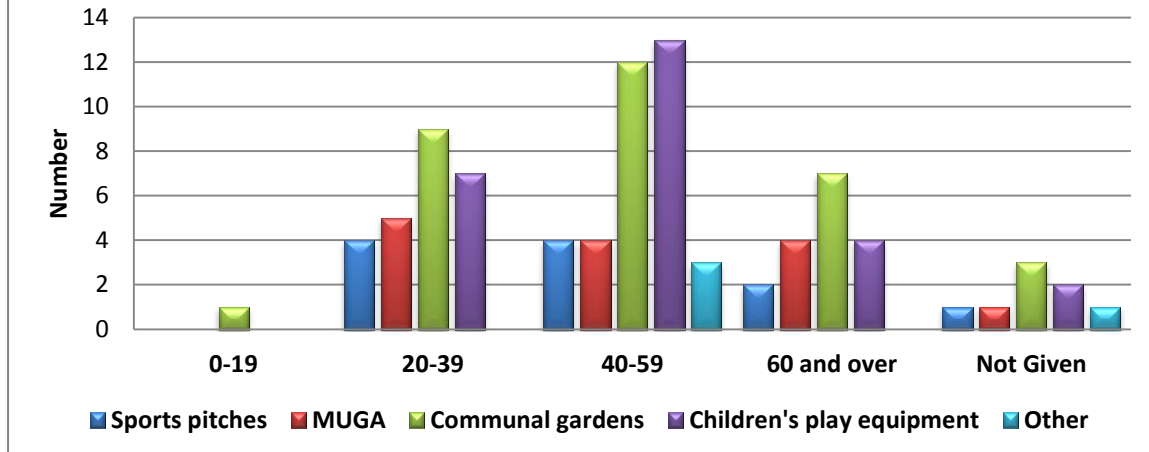
- Option 1** - Sports pitches
- Option 2** - Multi-use games areas (MUGA)
- Option 3** - Communal gardens
- Option 4** - Children's play equipment
- Option 5** - Other, please state

The Pie chart below shows how people responded to this question



The bar chart below breaks this information down further by looking at responses by age group.

Q7. Types of play areas and open spaces wanted by age



Communal gardens are the preferred option by more than 1 in 3 respondents. Children's play equipment was selected by 30% of respondents. All age groups have a majority choice of communal gardens except for 40-59 year olds who mainly want children's play equipment. Of those people who selected 'other', the most common suggestions include open spaces that can be enjoyed by all ages and leaving the existing arrangement.

Question 8: What do you think is important in deciding the layout of buildings, spaces and streets on the estate?

Question 8 seeks to explore what respondents feel are important in deciding the **layout of buildings, spaces and streets** on the Eastfields Estate. This question provided four options, and specifies a maximum of two choices per respondent. The choices given are as follows:

Option 1 - Making easy connections within the estate and to the surrounding area

Option 2 – Create traditional street forms

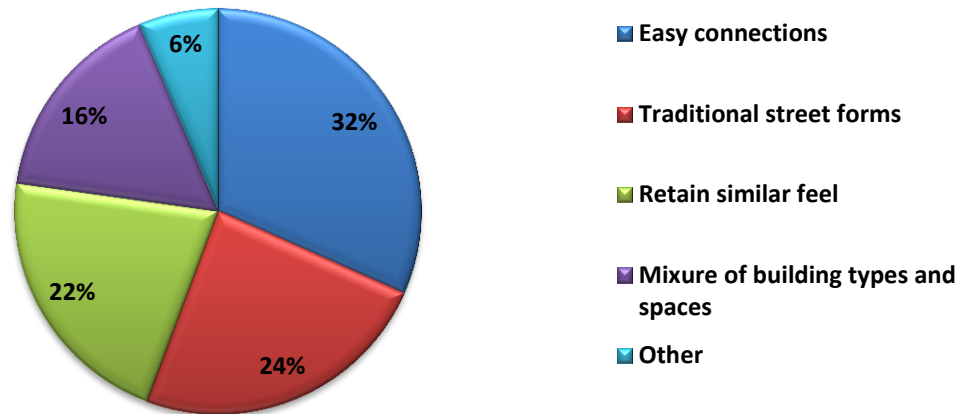
Option 3 – Retain a similar feel to the current character of the area

Option 4 – Creating a mixture of types of buildings and spaces

Option 5 - Other, please state

The pie chart below shows how people responded to this question.

Q8. Layouts of building, streets and spaces wanted by respondents



Making easy connections with the surrounding area was the choice of 32% of respondents, more than any other option. Nearly 1 in 4 respondents opted for the traditional street forms whilst 22% opted for a similar feel to the existing. The majority of respondents who selected 'other' would like things left as they are, whilst security and bigger garden sizes are other considerations suggested.

Question 9: Are there any other issues or options we should consider regarding the estate's open spaces and streets?

Question 9 provides an opportunity for respondents to provide their views on any other issues or options which should be given consideration regarding the estate's open spaces and streets. The most common issues raised are as follows; losing cul-de-sacs, lighting, landscaping, and safety.

Question 10: How should greater use of public transport be encouraged?

Question 10 asks how **greater use of public transport should be encouraged**. The question provides a choice of five options, with 'one or more' selections allowed. The options provided are as follows:

Option 1 - Provide better bus facilities

Option 2 - Provide better walking routes, bus and tram stops, shopping areas, parks and community facilities

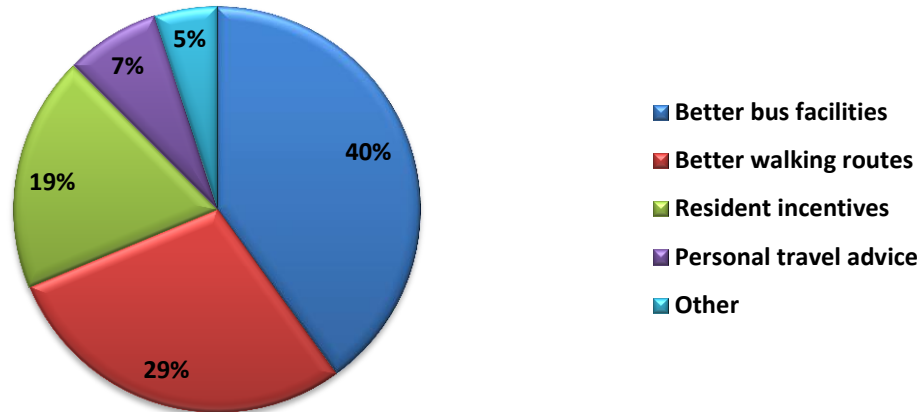
Option 3 - Provide incentives to help residents use public transport more

Option 4 - Provide personal travel advice

Option 5 - Other, please state

The pie chart below shows how people responded.

Q10. How should the use of public transport be encouraged?



40% of respondents want better bus facilities whilst 29% would like to see better walking routes. 7% would like to see personal travel advice provided. Of the respondents who selected the 'other' option, the most common suggestions were to leave things as they are, consider disable users, and consider parking restrictions.

Question 11: Walking and cycling are healthy lifestyle choices. How can we support this?

Question 11 asks how the Council can **support the choice of walking and cycling as modes of transport**. The question provides a choice of four options with 'one or more' selections allowed. The options provided are as follows:

Option 1 - Provide well-connected, attractive and safe cycle routes and footpaths

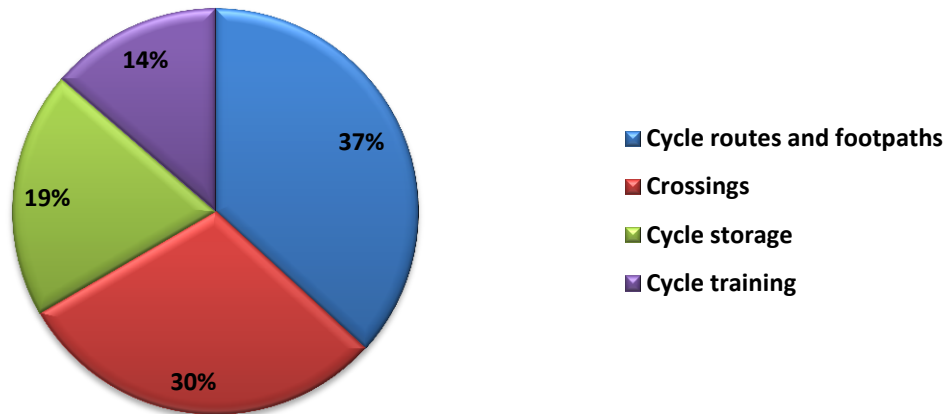
Option 2 - Provide safe and convenient crossings of busy roads and junctions

Option 3 - Provide secure and convenient cycle storage

Option 4 - Provide cycle training and support, to encourage people to switch to cycling

The pie chart below shows how people responded.

Q11. How should the Council support walking and cycling as modes of transport?



This question has brought a fairly close split, with 37% of respondents wanting well-connected, attractive and safe cycle routes and footpaths, with 30% wanting safe and convenient crossings of busy roads and junctions.

Question 12: How should parking be managed?

Question12 asked how people think that **parking should be managed** on the Eastfields Estate. The question provides three options, with 'one or more' selections allowed. The options provided are as follows:

Option 1 - Introduce parking controls

Option 2 - No parking restrictions

Option3 - Reduce the need for parking spaces by providing alternative ways for residents to access a car when needed

The bar chart below shows how people responded to this question.



22 people want to see parking controls introduced whilst 30 wanted no restrictions at all.

Question 13: Are there any other issues or options we should consider regarding the transport?

Question 13 provided a space for respondents to identify any **other issues or options which should be considered regarding transport**. The most common themes identified are as follows; better bus routes/reliability, traffic calming measures and access for emergency services.

Question 14: Should new community facilities be provided within Eastfields estate?

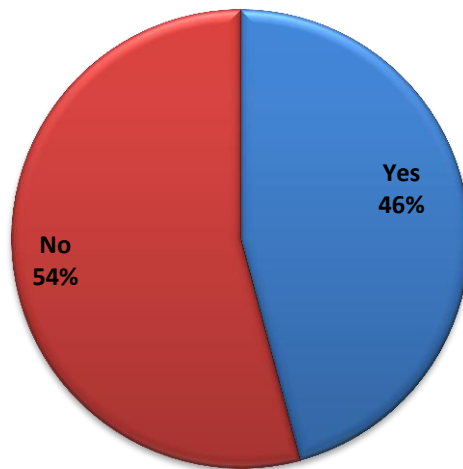
Question 14 seeks to identify whether people think there are sufficient **community facilities** on the Eastfields Estate, and if not what should be provided. The question provided two options, as follows:

Option 1 - Yes, we need more community facilities such as:

Option 2 - No, the existing community facilities on the estate and nearby are enough

The pie chart below shows how people responded.

Q14. Are more community facilities needed?



This question left respondents divided, with 46% of respondents wanting to see more community facilities whilst 54% feel the existing situation is adequate.

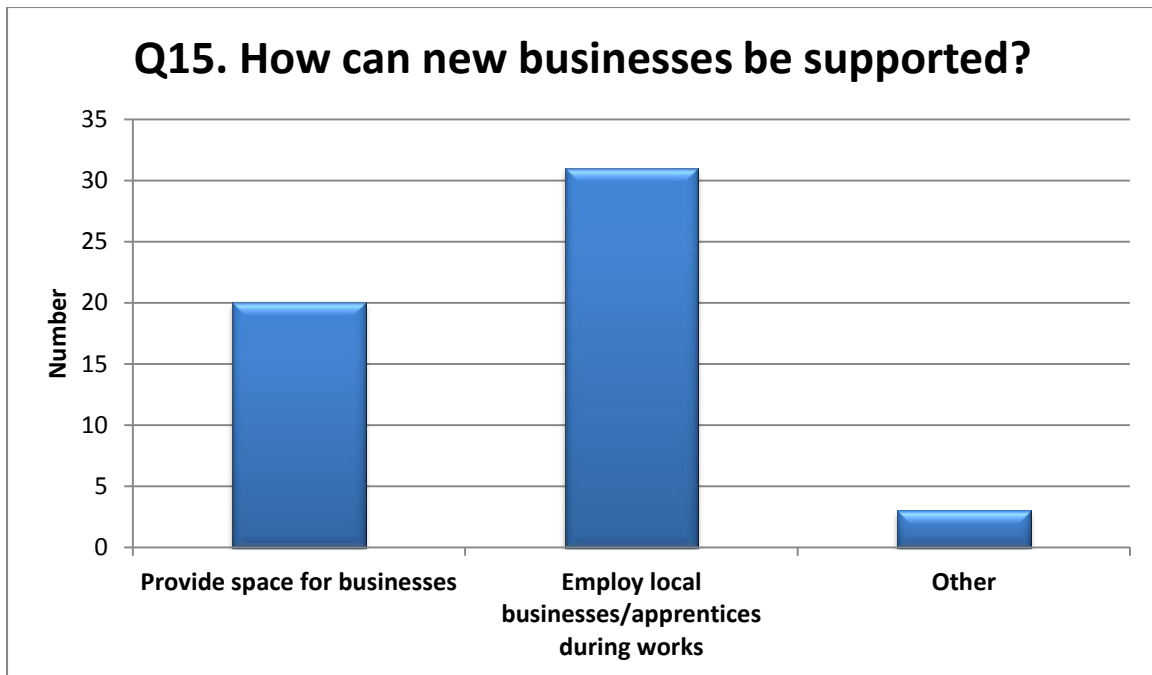
Question 15: How could refurbishment or regeneration support existing and new employment?

Question 15 asks how regeneration or refurbishment could **support new and existing employment**. The question provides three options with 'one or more' answer sought. The options are as follows:

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, please state



31 respondents want to see local businesses and apprentices employed through the refurbishment/regeneration and this is the most selected option. The next most popular option received 20 selections and this is for the provision of spaces on the estate for businesses.

Question 16: Are there any other issues or options we should consider regarding social and economic opportunities?

Question 16 allowed respondents to provide their views on any **additional issues or options that should be considered regarding social and economic opportunities**. The most common themes raised are as follows; support local businesses, employ local people, provide training opportunities for residents, and better use of the existing community centre.

2.4. HIGH PATH – ISSUES AND OPTIONS

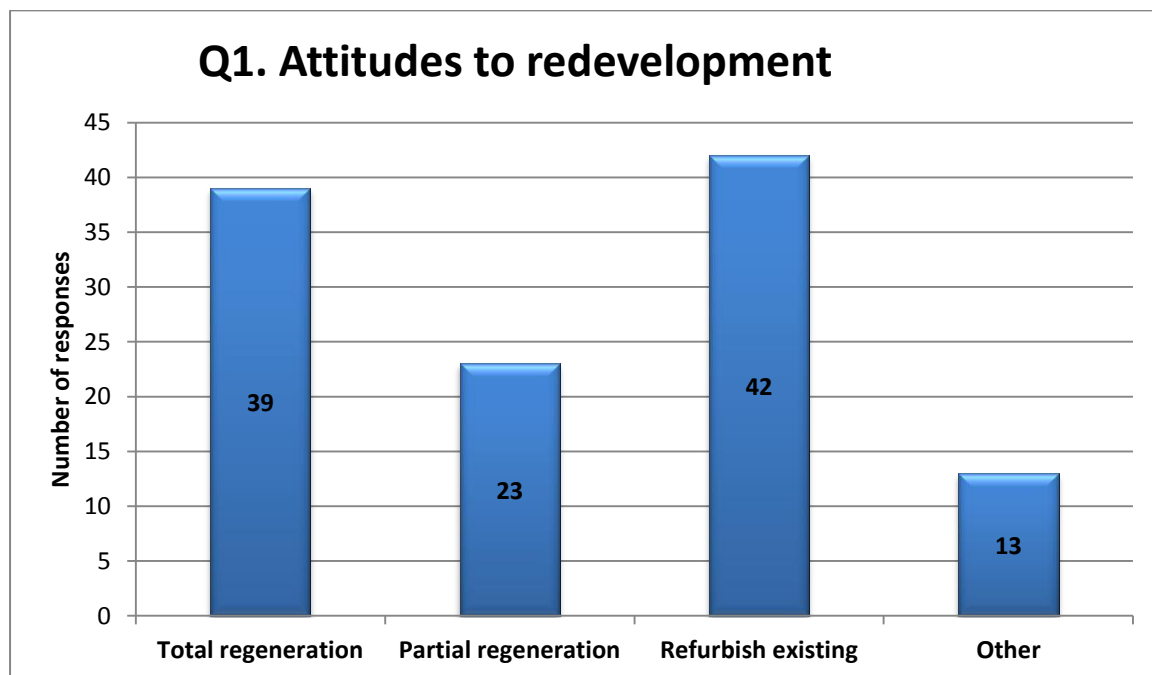
A total of 622 letters were sent out to residents within the estate, as well as the wider area, and the total number of responses received was 123. A summary of the data is presented in this document.

Question 1: Should all the homes on the High Path Estate be redeveloped?

Question 1 sought to understand the **appetite for regeneration** within the estate. The question read as follows: '**Should all the homes on the High Path Estate be redeveloped?**' The question was a multiple choice one with a choice of four answers as follows:

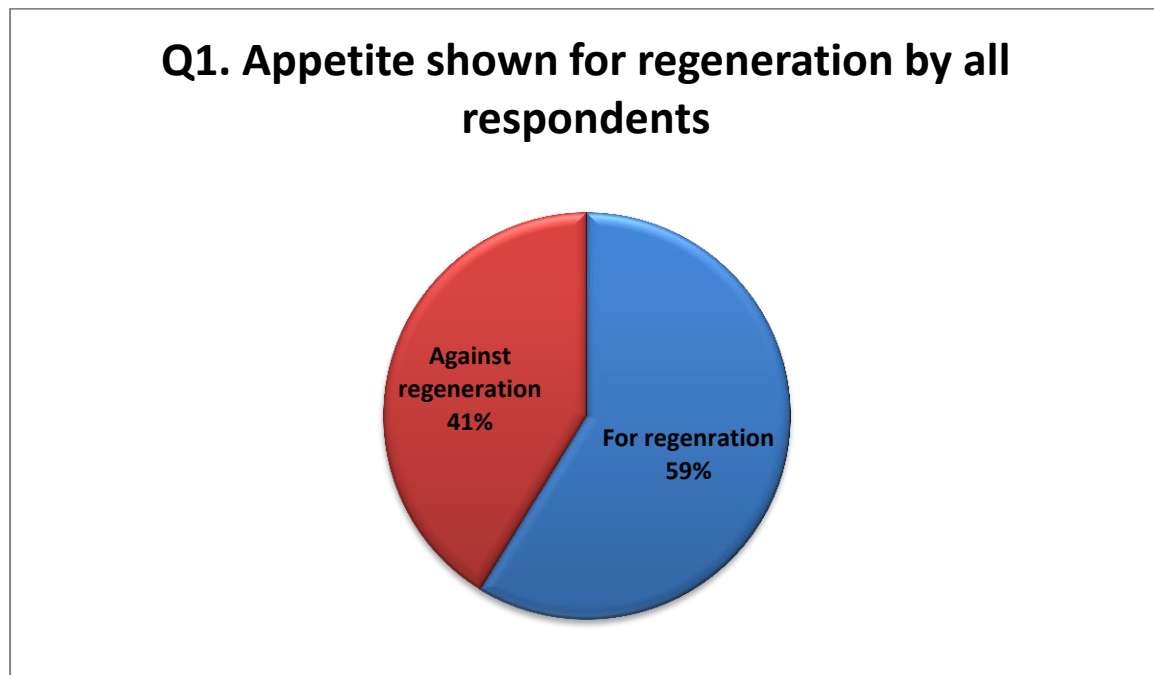
- Option 1: Demolish and redevelop the entire High Path Estate**
- Option 2: Partial redevelopment**
- Option 3: Invest in existing properties to bring them to minimum modern standards**
- Option 4: Other**

The responses to this question are shown in the bar chart below. It is noted that not all responses had the specific question answered, whilst some responses did not take the form of the questionnaire.



Option 4 gained over 10% of the responses, whilst 6 people did not explicitly answer the question. The respondents who selected option 4 generally fell into those people who want to see where needed and those people who would like to see no changes to the estate. Some were undecided. In some instances, the respondents who did not explicitly answer question 1 have, upon further analysis, provided an idea of whether they would like to see refurbishment or not. The pie chart below shows whether people are in favour of

regeneration (partial or complete) or not. The figures relating to 'for regeneration' have been reached by adding together those who selected options 1 and 2, as well as any responses which had selected 'other' but upon further analysis would indicate a desire for some regeneration. The 'against regeneration' data consists of those who selected the 'refurbish only' option, and those who selected the 'other' option but upon further analysis indicated a resistance to regeneration.



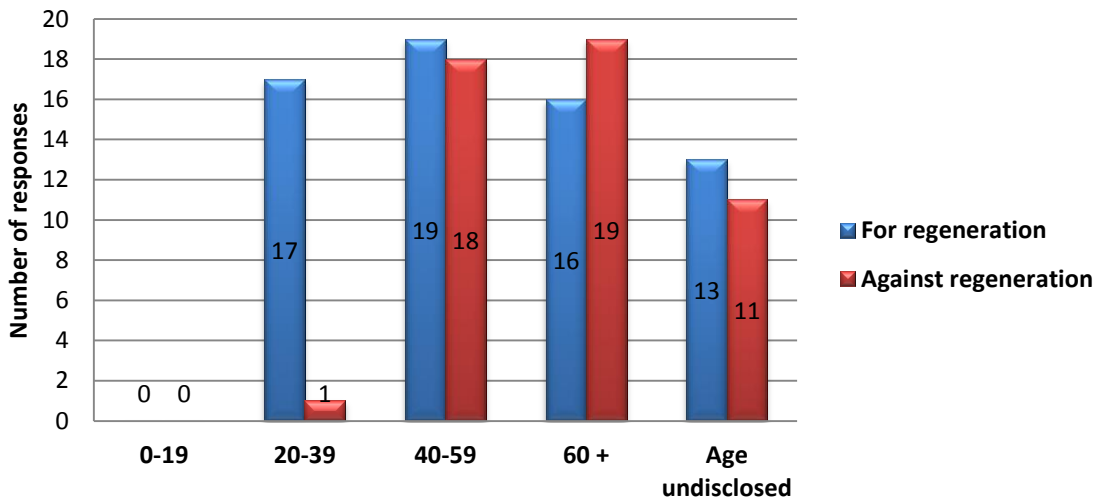
The chart above demonstrates a majority wanting to see regeneration of the estate. There are a number of factors which could influence the selection made by respondents. Among these are age and tenure. The following tables, charts and graphs explore these in more detail.

Age:	Total regeneration	Partial regeneration	Refurbish existing	Other	Total
0-19	0	0	0	0	0
20-39	13	4	1	0	19
40-59	9	8	13	7	37
60 +	7	5	17	4	38
Age undisclosed	6	6	11	2	25

As with the overall data, the numbers of responses to question 1 result in less than the total number of responses.

The chart below shows whether people support regeneration of the estate, having further analysed the responses of those who selected option 4 and those who did not select an option.

Q1. Views to regeneration of the High Path Estate by age

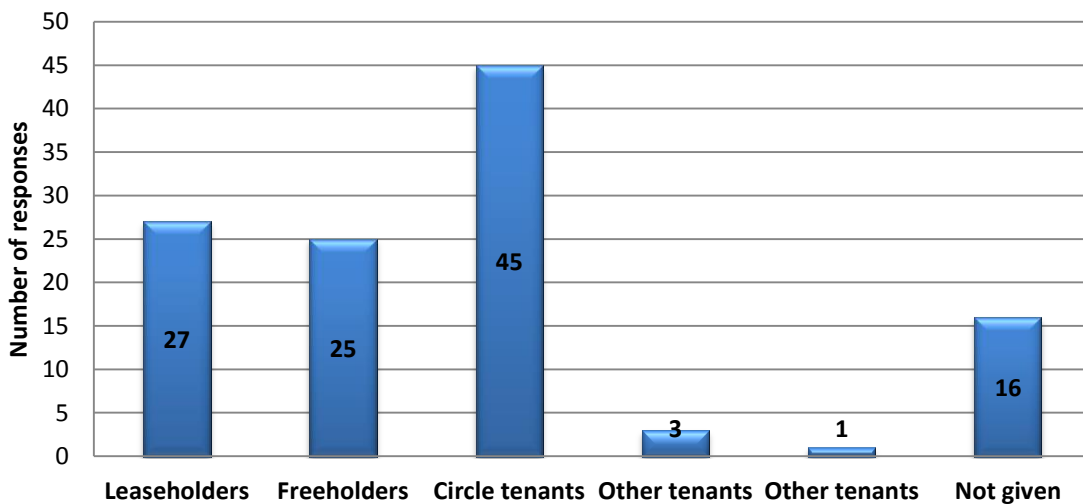


The above chart demonstrates a relatively even split between wanting regeneration or not across all age groups.

Tenure type:

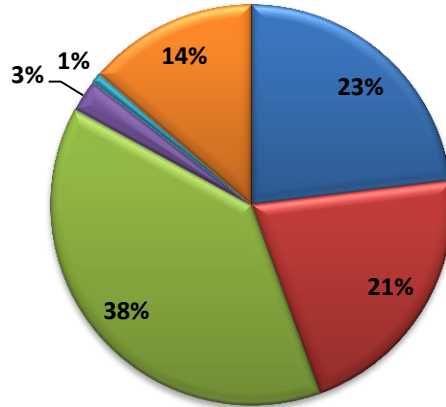
The tables and charts below explore the Responses to question 1 by tenure type. The 'other' category relates to other interested parties/bodies.

Q1. Number of responses received by tenure type



Q1. Proportion of responses by tenure type

■ Leaseholders ■ Freeholders ■ Circle Tenants ■ Other tenants ■ Other ■ Not identified

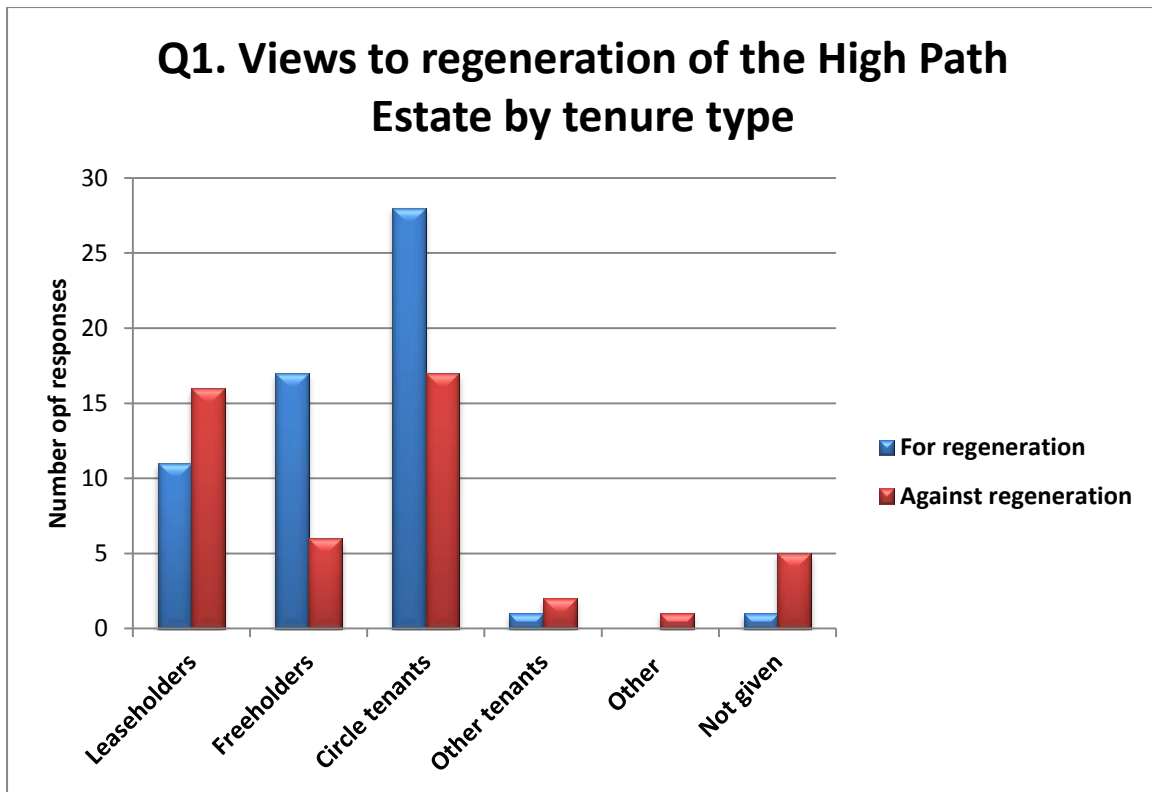


The data above shows that Circle tenants form the biggest respondents. Freeholders and leaseholders make up just over one fifth of the responses received each. Non-identified individuals form a considerable proportion – 14%.

The table below shows the breakdown of selections by tenure type.

	Total regeneration	Partial regeneration	Refurbish existing	Other
Leaseholder	6	2	13	6
Freeholder	8	8	5	4
Circle tenant	19	8	17	1
Other tenant	0	1	1	1
Other	0	0	1	0
Not given	6	4	5	1

The chart below shows whether people support regeneration of the estate, having further analysed the responses of those who selected option 4 and those who did not select a specific option.



Question 2: What size of homes should be provided within the High Path estate?

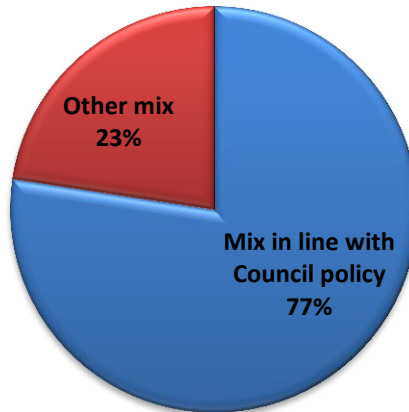
Question 2 seeks to understand the **size** of homes that people would like to see on the High Path Estate. The question provides two options as follows:

Option 1 - mix of different size of homes: provide a mix of different size of homes consisting around 33% one bedroom, 32% two bedrooms and 35% three or more bedroom homes. This option reflects Merton's current policy to encourage a mix of dwelling sizes.

Option 2 - If you do not agree with this mix, how would you change it?

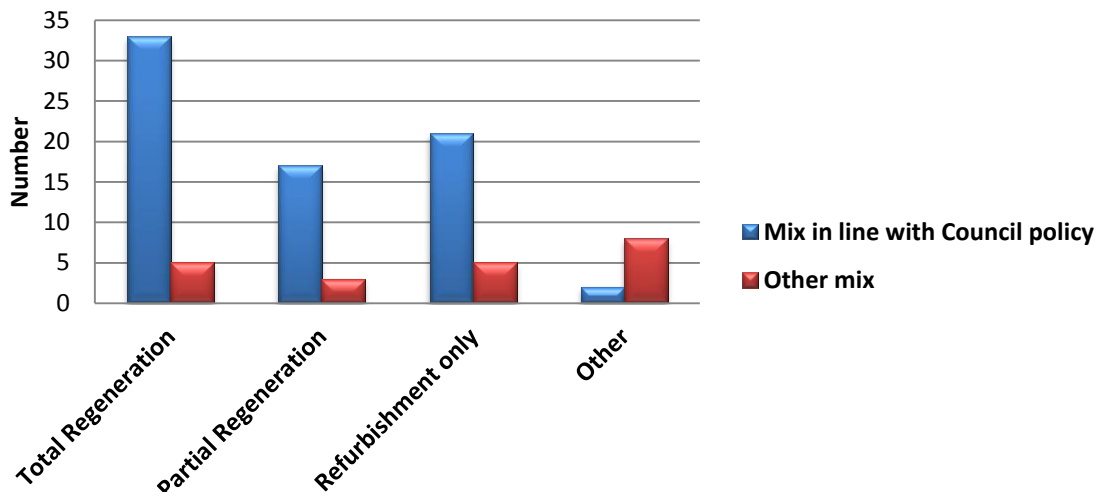
The Pie chart below shows which option respondents selected.

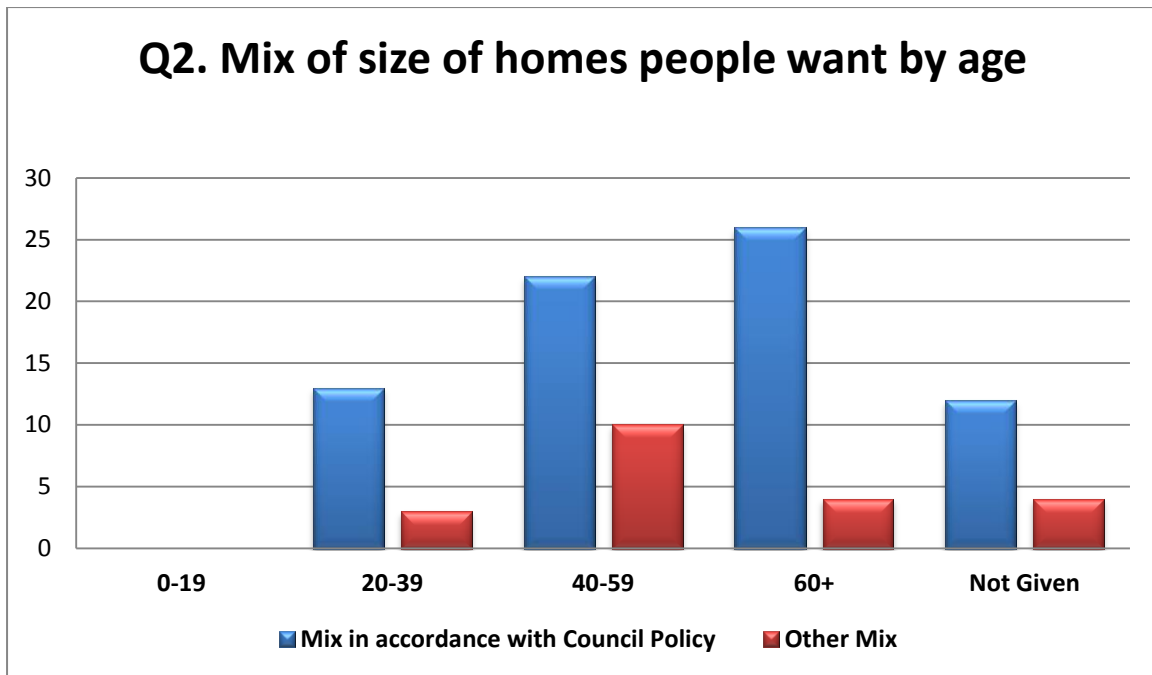
Q2. What mix of dwelling size should be on the Estate?



It is worth noting that respondents were encouraged to answer all questions, even if their answer to question 1 was not in favour of regeneration. The following bar charts show the size of property wanted by respondents based on how they feel regarding regeneration and also by age.

Q2. Mix of size of homes people want by attitude to regeneration





It is noted that more than three quarters of respondents chose a mix of housing size in line with the Council’s policies, and this view was shared across those who sought regeneration of any sort and those who selected the refurbishment only option. Those who had selected ‘other’ for type of redevelopment sought bucked this trend with most respondents wanting things to be left as they are. The desire for a mix of housing size in accordance with Council policy is shared across all age groups.

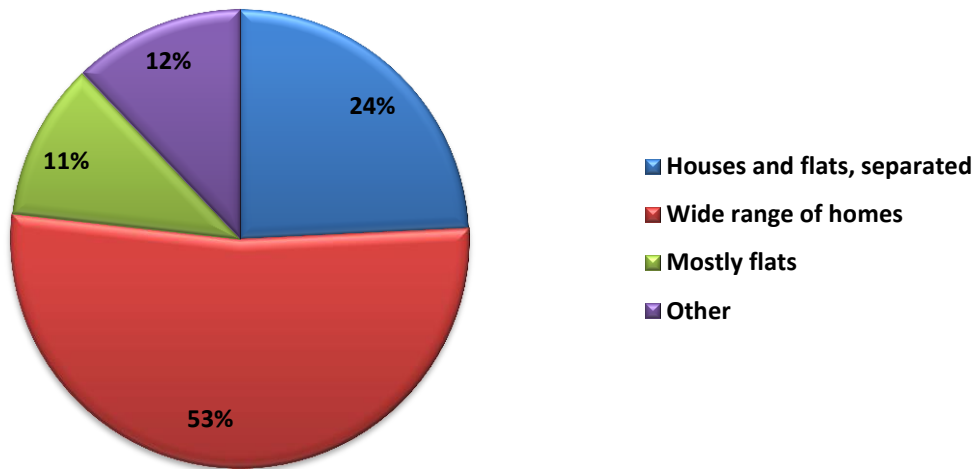
Question 3: What type of homes should be provided across the estate?

Question 3 seeks to understand the **types** of homes that people feel should be provided across the High Path Estate. This question had four possible options as follows:

- 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, please state

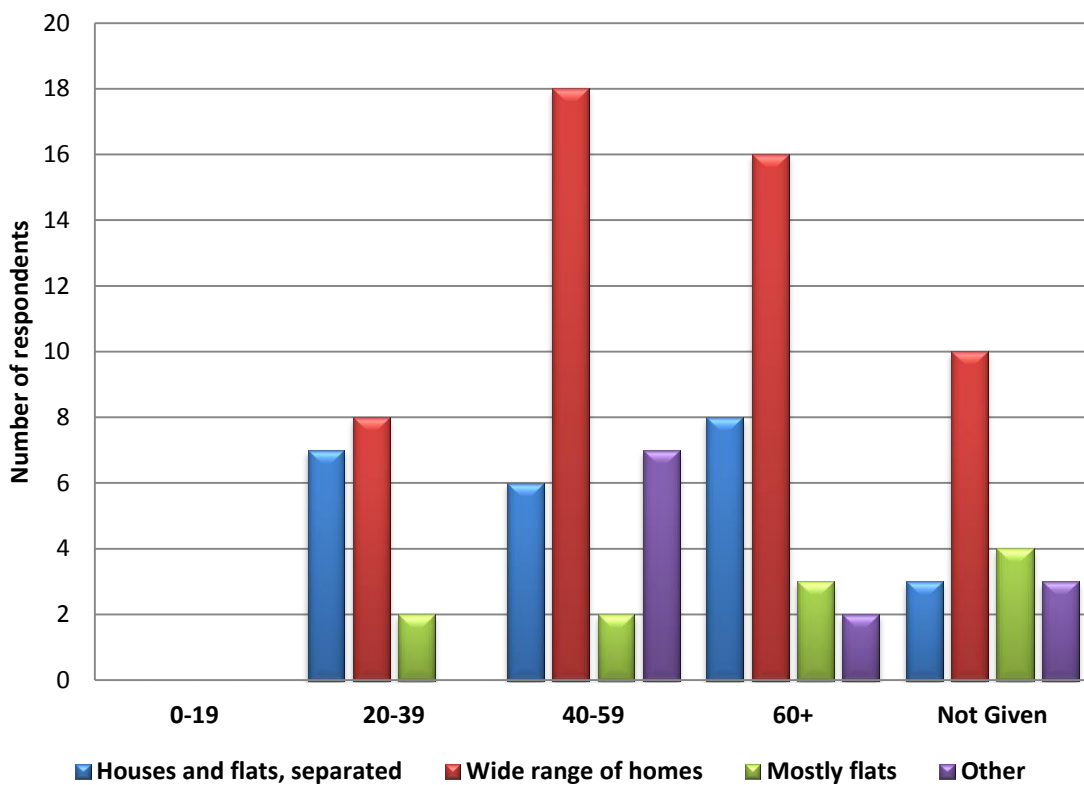
The following pie chart shows how people responded to this question.

Q3. Types of homes wanted



The following bar chart breaks the above information down by age of respondents.

Q3. Types of homes wanted by age



More than half of respondents opted for the mix of dwelling types across the estate. This option was the most popular among all age groups. Of the respondents who chose the 'other' option, the most common opinions given were to leave the estate as is, provide

houses only, and to provide low-rise development only.

Question 4: How should building heights is distributed through the High Path estate?

Question 4 tries to identify what **height** buildings people think should be on the High Path Estate. This question had a range of choices as follows:

Option 1 - Evenly across the estate

Option 2 - Taller buildings around the edges. This option had four sub options as follows:

a) taller buildings should be located by the roads to the south (High Path/Merantun Way)

b) taller buildings should be located towards Abbey Road to the east of the estate

c) taller buildings should be located towards Morden Road to the west of the estate

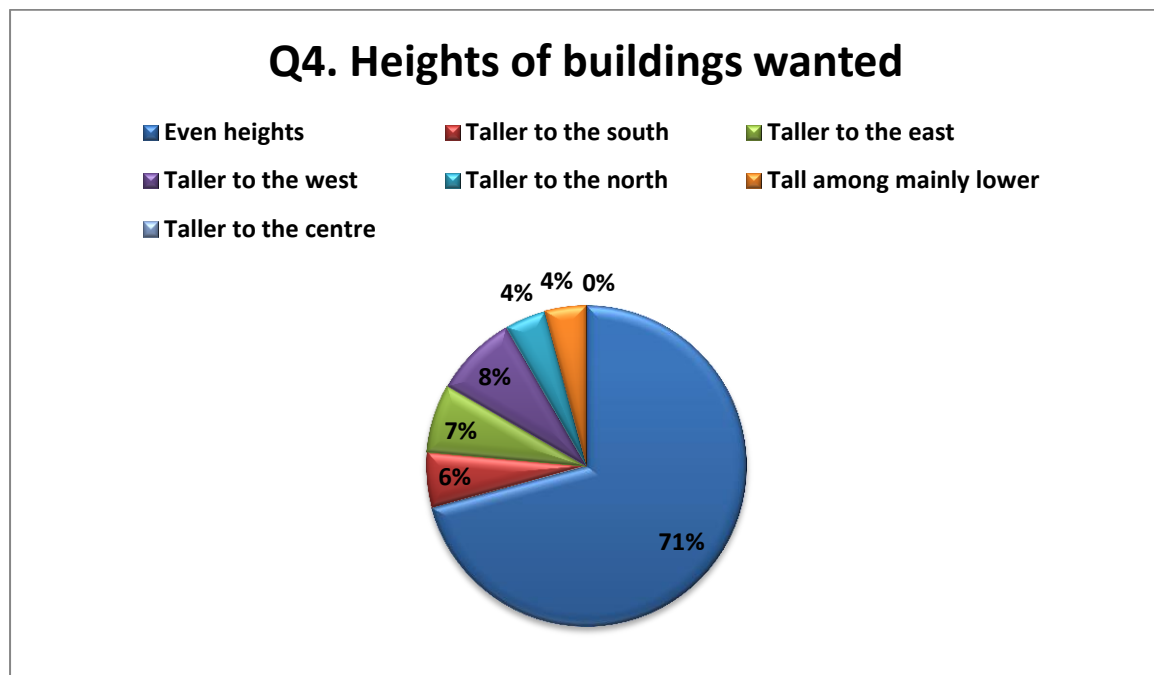
d) Taller buildings should be located towards Merton High Street to the north of the estate

Option 3 - Variety across the estate. This option had two sub options as follows:

a) some taller buildings evenly spread across the estate in general, amongst mainly lower buildings

b) taller buildings towards the centre of the site

The pie chart below shows how people responded to this question.



More than 70% of people have opted for building heights to be even across the estate. The next most popular choice was for taller buildings towards Morden Road to the west of the site, gaining 8% of the respondent's choice.

Question 5: Are there any other issues or options we should consider regarding new homes?

Question 5 provided space for free text regarding thoughts on **other considerations regarding new homes**. The most common issues raised are as follows; consider communal areas, concentrate on estates in need only, consider orientation of buildings and size of windows to ensure direct sunlight is received, heights of buildings, replace existing like for like, provision of bungalows, incorporate garages in design of buildings, prevent criminal opportunities, incorporate lifts in all blocks, provide private gardens for all houses, and consideration for disabled and elderly residents.

Question 6: What type of outdoor space would you prefer to see within the estate?

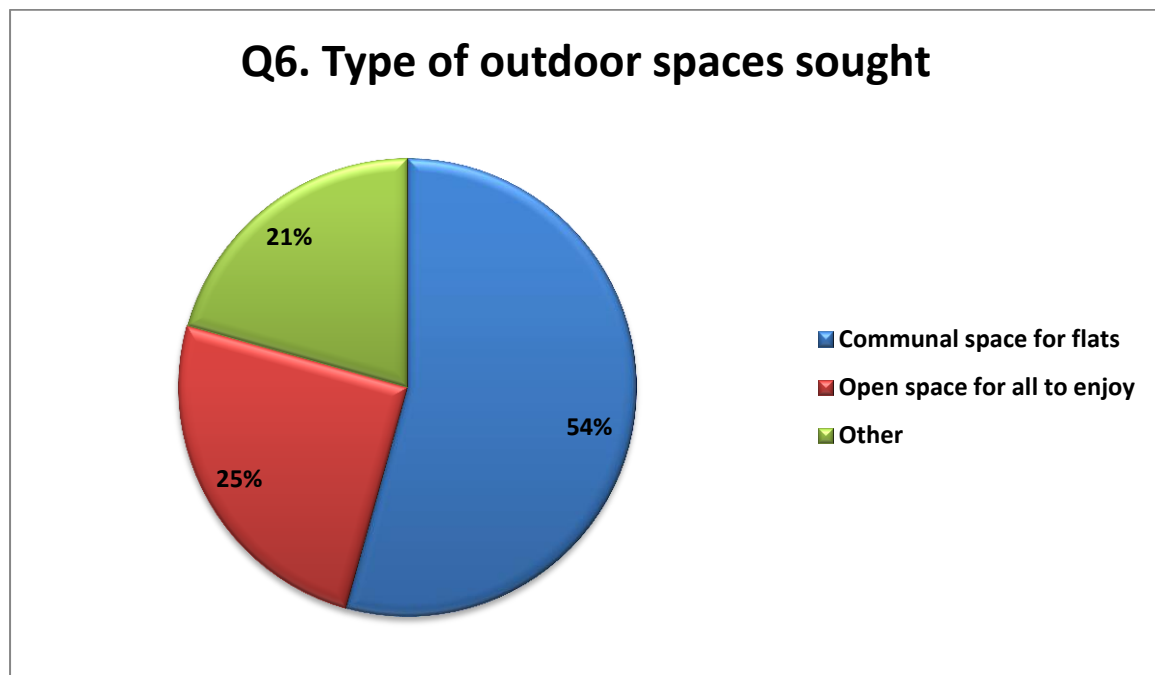
Question 6 looks at the **types of outdoor spaces** that respondents would prefer to see within the High Path Estate. Three options were provided, as follows:

Option 1 - Concentrate on providing communal space for flats

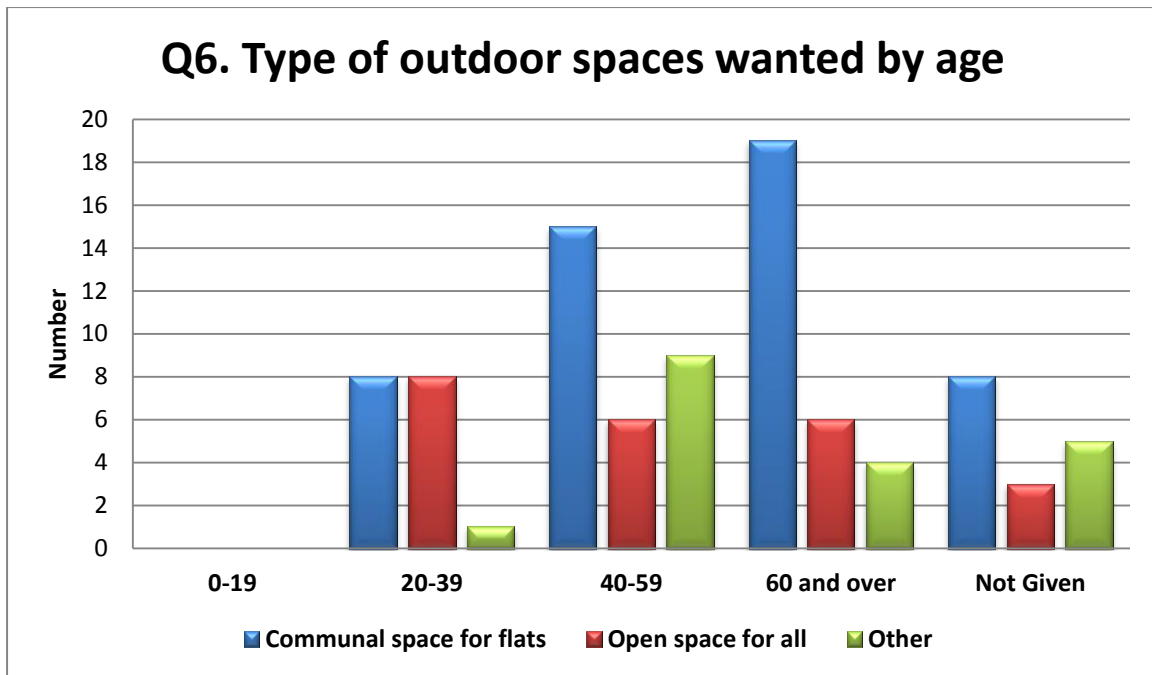
Option 2 - Provide a single public open space for everyone to enjoy

Option 3 - Other, please state

The bar chart below show how people responded to this question.



The following bar chart breaks the above information down by age of respondents.



More than half of respondents have chosen the option for communal areas for flats. In no age group was another option more popular, although the 20-39 year old respondents wanted to see open spaces for all in equal measure. 21% of respondents selected ‘other’ with the most common request being for things to be left as they are. Some respondents did not elaborate.

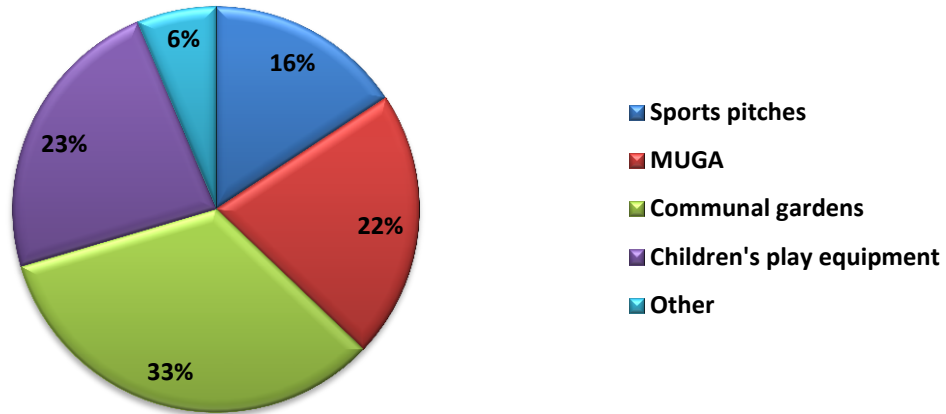
Question 7: What types of play areas and outdoor space would you prefer to see?

Question 7 asks what **types of play areas and open spaces** people would like to see within the High Path Estate. This question provides five options, and specifies a maximum of two choices per respondent. The choices given are as follows:

- Option 1** - Sports pitches
- Option 2** - Multi-use games areas (MUGA)
- Option 3** - Communal gardens
- Option 4** - Children's play equipment
- Option 5** - Other, please state

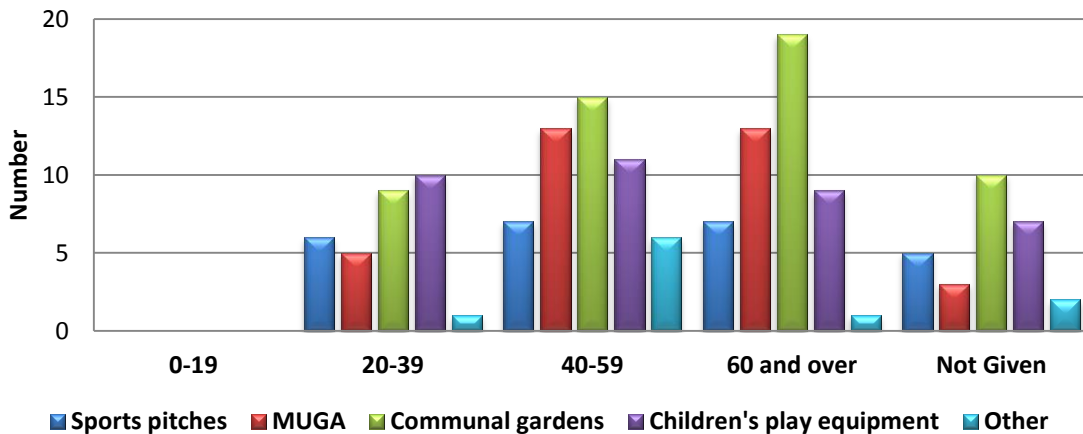
The pie chart below shows how people responded to this question

Q7. Types of play areas and open spaces wanted



The bar chart below breaks this information down further by looking at responses by age group.

Q7. Types of play areas and open spaces wanted by age



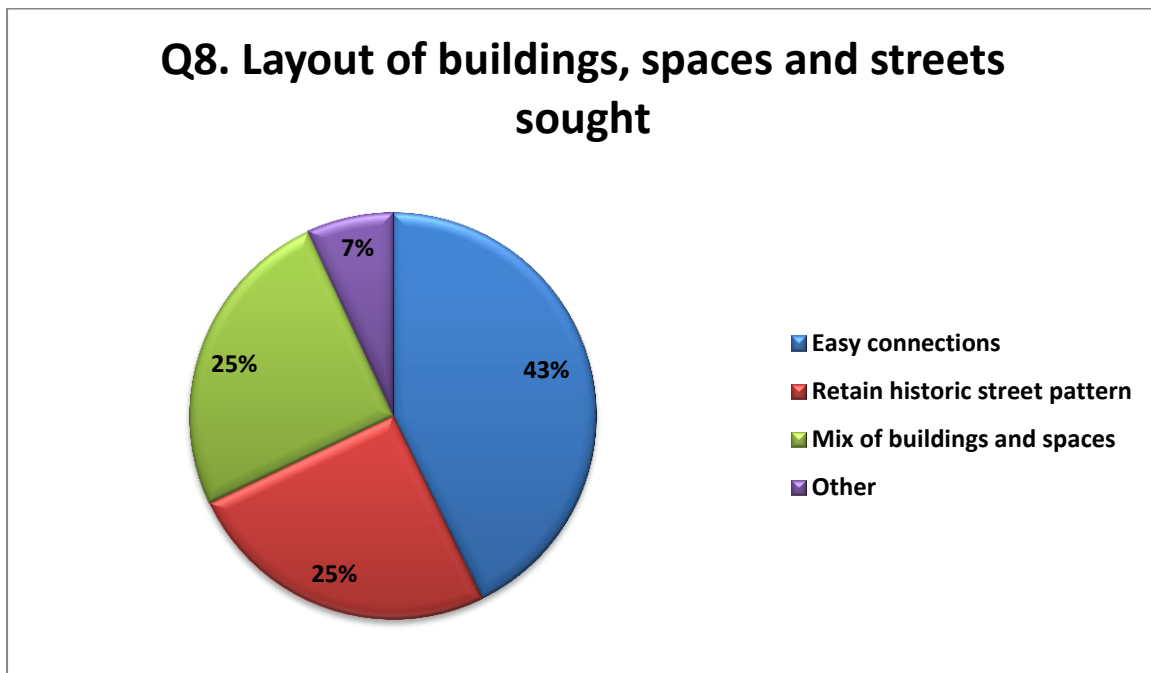
Communal gardens are the preferred option by 1 in 3 respondents. Multi-use games areas and children's play equipment were each selected by more than 20% of respondents. All age groups have a majority choice of communal gardens except for 20-39 year olds who mainly want children's play equipment. Of those people who selected 'other', the most common suggestions include tranquil gardens, a flexible open space for multiple uses, and to leave the existing arrangement.

Question 8: What do you think is important in deciding the layout of buildings, spaces and streets on the estate?

Question 8 seeks to explore what respondents feel are important in deciding the **layout of buildings, spaces and streets** on the High Path Estate. This question provided four options, and specifies a maximum of two choices per respondent. The choices given are as follows:

- Option 1** - Making easy connections within the estate and to the surrounding area
- Option 2** - Retain the historic street pattern and create traditional street forms
- Option 3** - Creating a mixture of types of buildings and spaces
- Option 4** - Other, please state

The pie chart below shows how people responded to this question.



Making easy connections with the surrounding area was the choice of 43% of respondents, more than any other option. 1 in 4 respondents opted for the retention of historic street patterns and a mixture of types of buildings and spaces. The majority of respondents who selected 'other' would like things left as they are, whilst suggestions for an enclosed estate was also mooted.

Question 9: Are there any other issues or options we should consider regarding the estate's open spaces and streets?

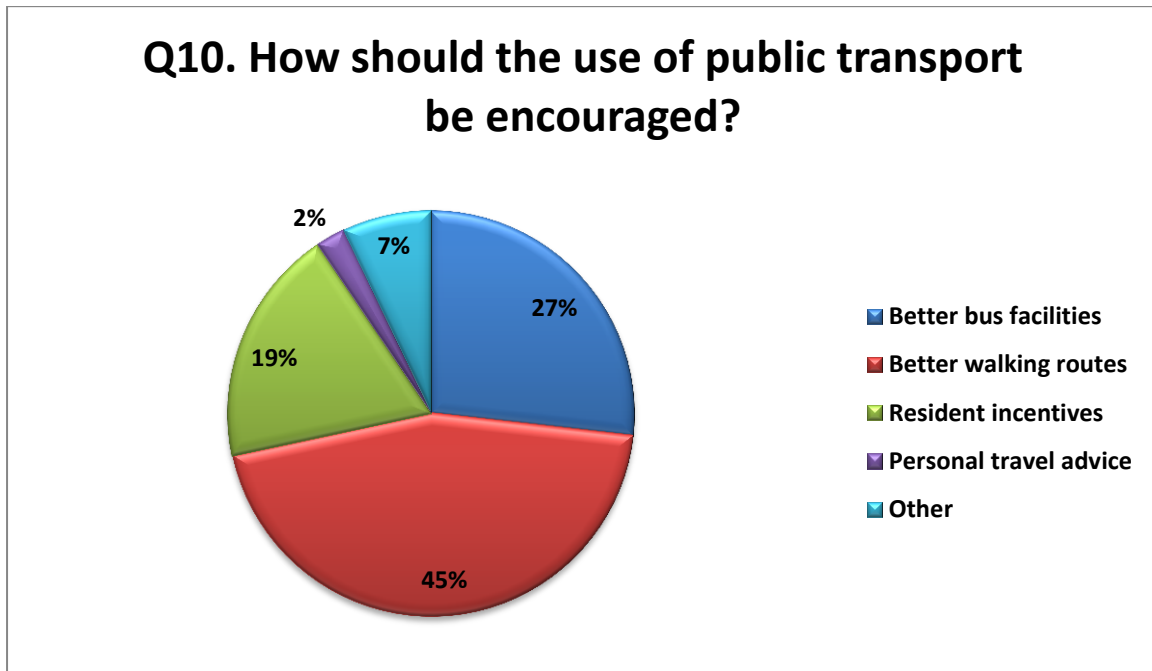
Question 9 provides an opportunity for respondents to provide their views on any other issues or options which should be given consideration regarding the estate's open spaces and streets. The most common issues raised are as follows; improved security, incorporate street trees/planting, street lighting, wider and disabled-friendly pavements, no alley ways to reduce criminal opportunity and maintenance of public areas.

Question 10: How should greater use of public transport be encouraged?

Question 10 asks how **greater use of public transport should be encouraged**. The question provides a choice of five options, with 'one or more' selections allowed. The options provided are as follows:

- 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, please state

The pie chart below shows how people responded.



Nearly half of respondents chose option 2, the provision of better walking routes, bus and tram stops, shopping areas, parks and community facilities. 27% of respondents want better bus facilities whilst only 2% would like to see personal travel advice provided. Of the respondents who selected the 'other' option, the most common suggestions were to leave things as they are, consider disable users, and consider parking restrictions.

Question 11: Walking and cycling are healthy lifestyle choices. How can we support this?

Question 11 asks how the Council can **support the choice of walking and cycling as modes of transport**. The question provides a choice of four options with 'one or more' selections allowed. The options provided are as follows:

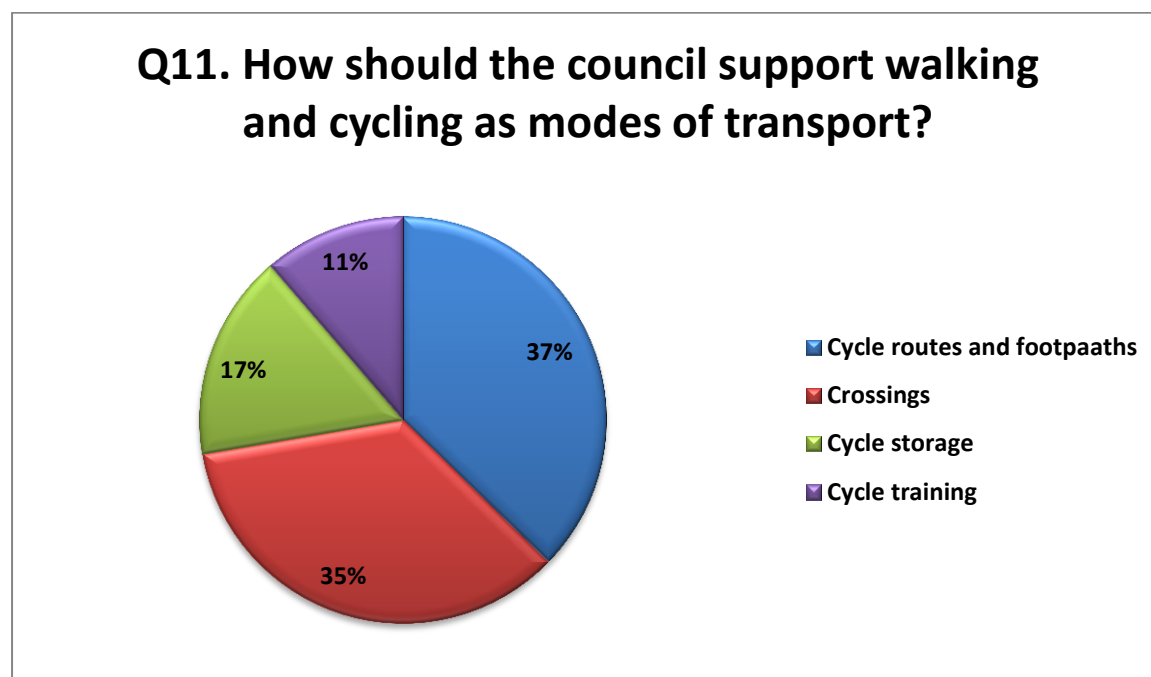
- Option 1** - Provide well-connected, attractive and safe cycle routes and footpaths

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

The pie chart below shows how people responded.



This question has brought about one of the closest splits, with 37% of respondents wanting well-connected, attractive and safe cycle routes and footpaths and 35% selecting safe and convenient crossings of busy roads and junctions.

Question 12: How should parking be managed?

Question 12 asked how people think that **parking should be managed** on the High Path Estate. The question provides three options, with 'one or more' selections allowed. The options provided are as follows:

Option 1 - Introduce parking controls

Option 2 - No parking restrictions

Option 3 - Reduce the need for parking spaces by providing alternative ways for residents to access a car when needed

The bar chart below shows how people responded to this question.



80 people want to see parking controls introduced and this was the overwhelming choice among respondents. The next most popular option was to reduce the need for car usage by promoting alternative methods of transport, and this received 18 selections.

Question 13: Are there any other issues or options we should consider regarding the transport?

Question 13 provided a space for respondents to identify any **other issues or options which should be considered regarding transport**. The most common themes identified are as follows; improving road layouts, improving pavements, incorporating garages into building design so less need for on-street parking, prevent rat-runs, prevent commuters parking on the estate, and improved bus stops and access to South Wimbledon Underground Station.

Question 14: Should new community facilities be provided within High Path estate?

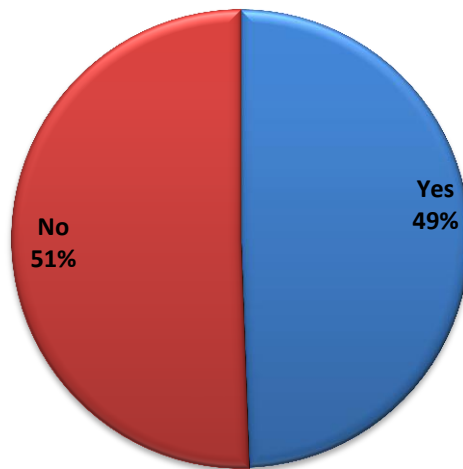
Question 14 seeks to identify whether people think there are sufficient **community facilities** on the High Path Estate, and if not what should be provided. The question provided two options, as follows:

Option 1 - Yes, we need more community facilities such as:

Option 2 - No, the existing community facilities on the estate and nearby are enough

The pie chart below shows how people responded.

Q14. Are more community facilities needed?

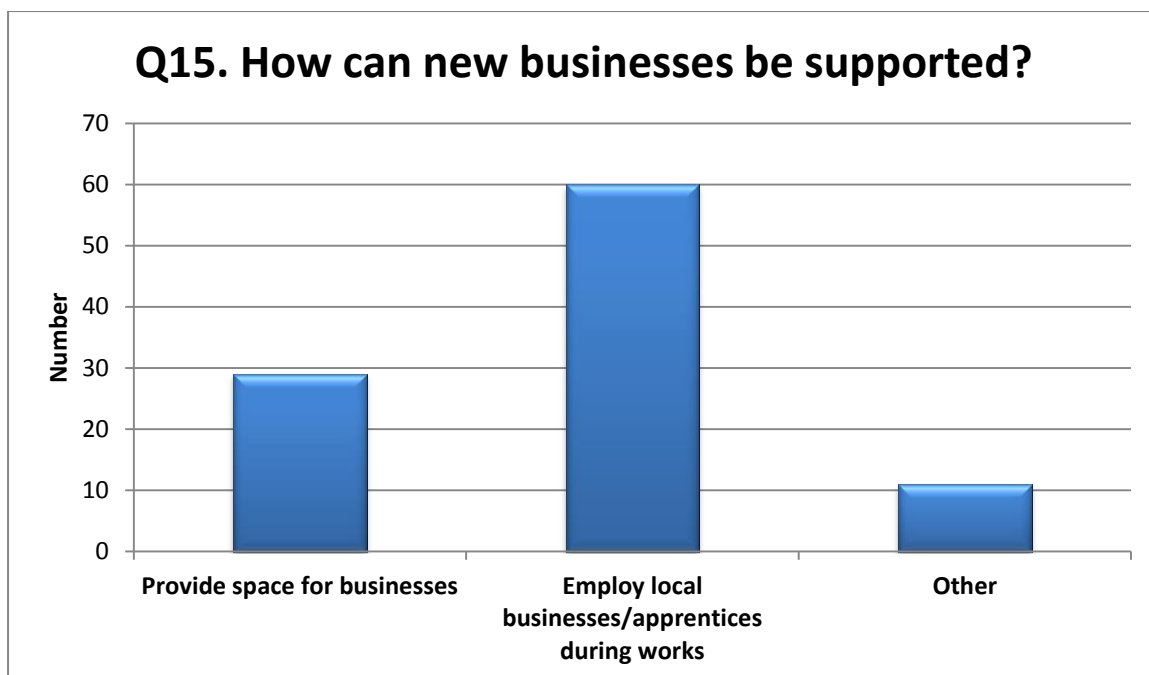


This question left respondents divided, with 49% of respondents wanting to see more community facilities whilst 51% feel the existing situation is adequate.

Question 15: How could refurbishment or regeneration support existing and new employment?

Question 15 provides three options with 'one or more' answer sought. The options are as follows:

- 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, please state



60 respondents want to see local businesses and apprentices employed through the refurbishment/regeneration and this is, by some way, the most selected option. The next most popular option received 29 selections and this is for the provision of spaces on the estate for businesses.

Question 16: Are there any other issues or options we should consider regarding social and economic opportunities?

Question 16 allowed respondents to provide their views on any **additional issues or options that should be considered regarding social and economic opportunities**. The most common themes raised are as follows; support local businesses, employ local people, prevent large chain supermarkets occupying local premises, provision of new community facilities including GP surgery and social clubs, and encouragement of hands-on community involvement within the estate.

2.5. RAVENSBURY - Issues and Options

A total of 207 letters were sent out to residents within the estate. The total number of responses received was 59.

Question 1: Should all the homes on the Ravensbury Estate be redeveloped?

Question 1 sought to understand the appetite for regeneration within the estate. The question read as follows: '**Should all the homes on the Ravensbury Estate be redeveloped?**' The question was a multiple choice one with a choice of four answers as follows:

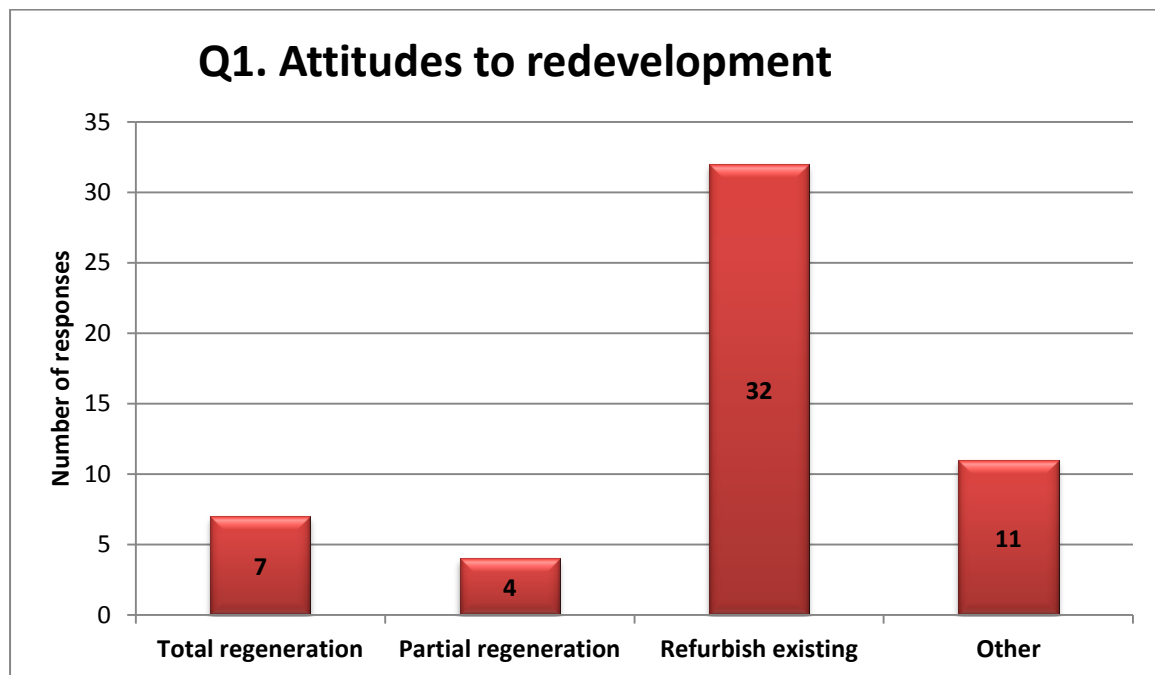
Option 1: Demolish and redevelop the entire Ravensbury Estate

Option 2: Partial redevelopment

Option 3: Invest in existing properties to bring them to minimum modern standards

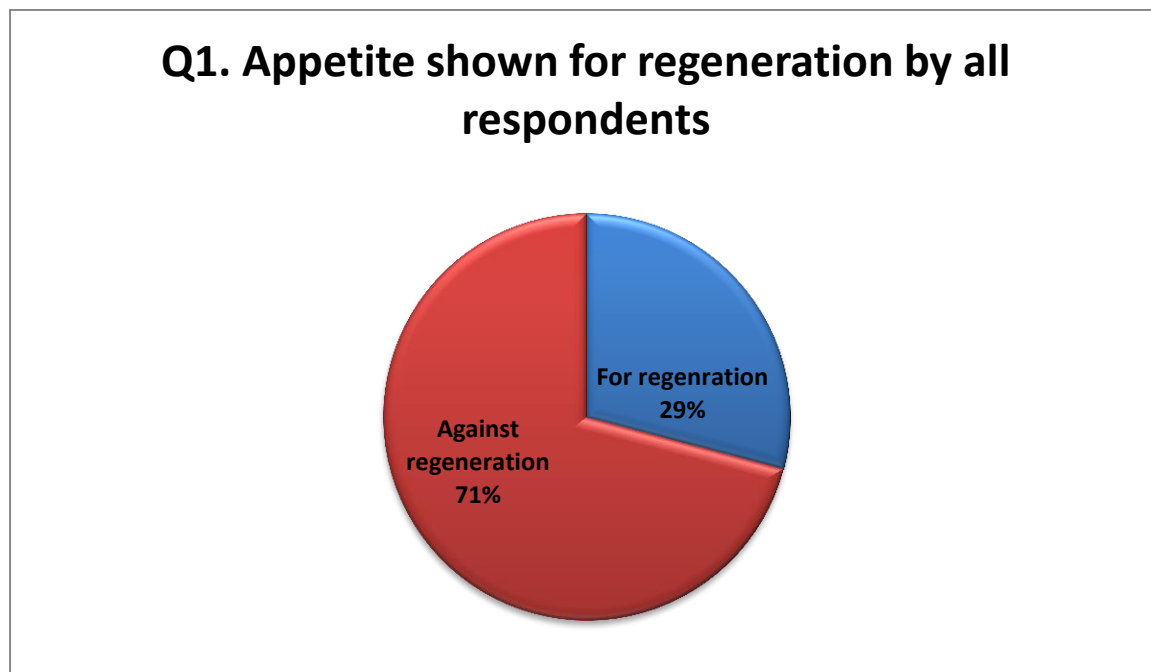
Option 4: Other

The responses to this question are shown in the bar chart below. It is noted that not all responses had the specific question answered, whilst some responses did not take the form of the questionnaire. Any difference between the total number of responses received and the total responses to question 1 below is due to a non-response to question 1.



Option 4 gained more than 20% of the responses, whilst 5 people did not explicitly answer the question. The responses that selected option 4 generally fell into those people who want to see refurbishment at no cost to residents (option 3 requires a cost for all leaseholders) and those people who would like to see redevelopment of the Orlit homes only. In some instances, the respondents who did not explicitly answer question 1 have, upon further analysis, provided an idea of whether they would like to see refurbishment or not. The pie chart below shows whether people are in favour of regeneration (partial or complete) or not.

The figures relating to 'for regeneration' have been reached by adding together those who selected options 1 and 2, as well as any responses which had selected 'other' but upon further analysis would indicate a desire for some regeneration. The 'against regeneration' data consists of those who selected the 'refurbish only' option, and those who selected the 'other' option but upon further analysis indicated a resistance to regeneration.



The chart above demonstrates that less than a quarter of respondents selected total or partial regeneration, with the vast majority against regeneration. Many would like to see refurbishment of the existing housing stock.

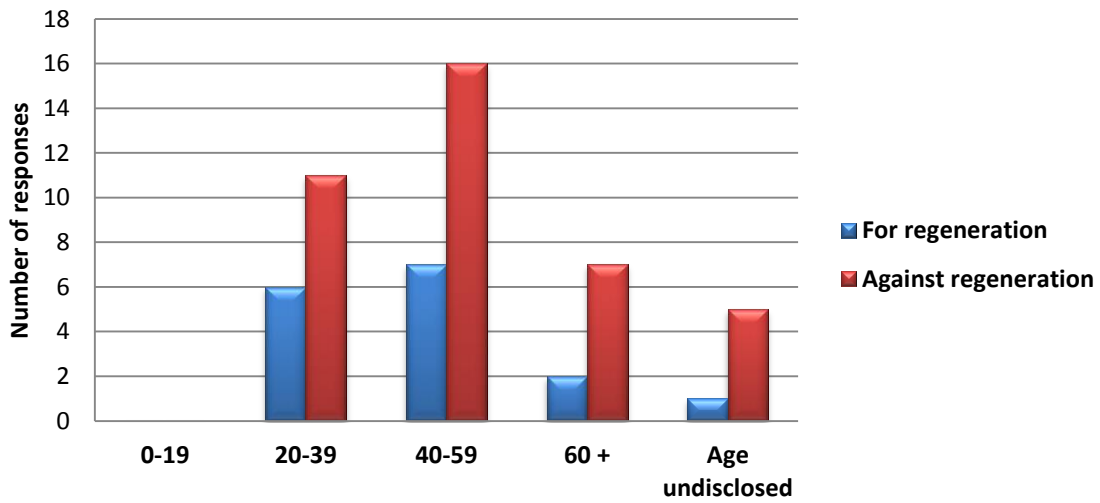
There are a number of factors which could influence the selection made by respondents. Among these are age and tenure. The following charts and graphs explore these in more detail.

Age:

	Demolish/redevelop	Partial regeneration	Refurbish existing	Other	Total
0-19	0	0	0	0	0
20-39	3	1	10	3	17
40-59	4	2	14	3	23
60 +	0	1	5	2	8
Age undisclosed	0	0	3	3	6

As with the overall data, the number of responses to question 1 results in less than the total number of responses. The chart below shows whether people support regeneration of the estate, having further analysed the responses of those who selected option 4 and those who did not select an option.

Q1. Views to regeneration of the Ravensbury Estate by age of respondent

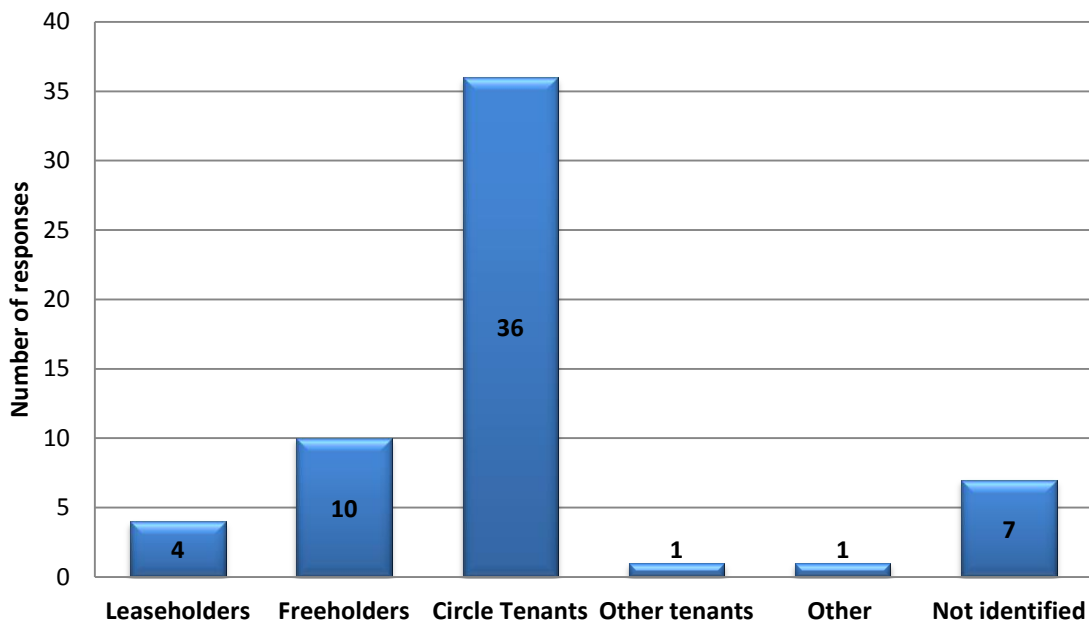


The above chart demonstrates that, across all age ranges (except for 0-19 where no responses were received), regeneration is not supported.

Tenure type:

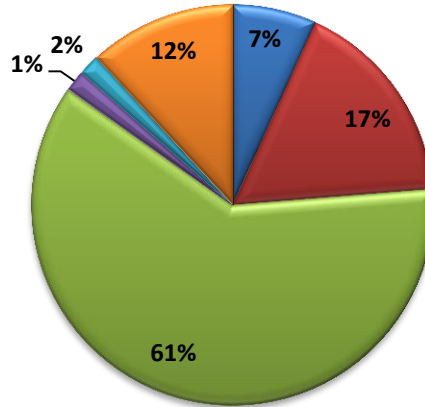
The tables and charts below explore the Responses to question 1 by tenure type. The 'other' category relates to other interested parties/bodies.

Q1. Number of responses received by tenure type



Q1. Proportion of responses by tenure type

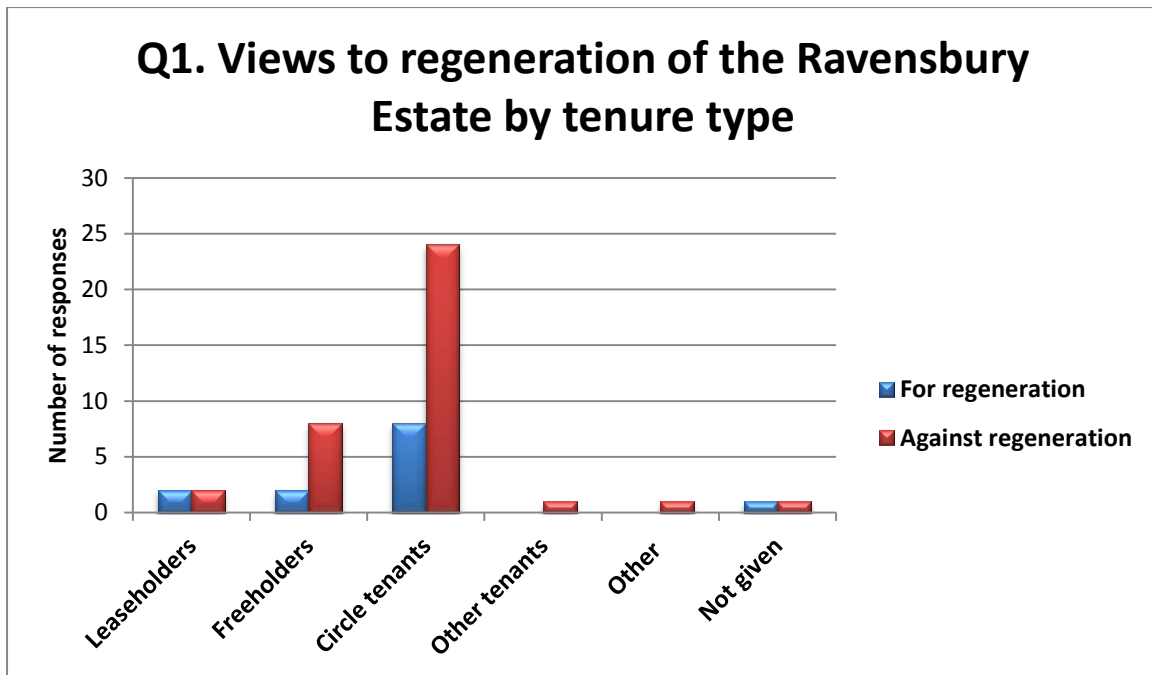
■ Leaseholders ■ Freeholders ■ Circle Tenants ■ Other tenants ■ Other ■ Not identified



The data above shows that the majority of responses came from tenants of Circle Housing. Leaseholders and Freeholders make up less than a quarter of all responses.

	Demolish/redevelop	Partial regeneration	Refurbish existing	Other
Leaseholder	1	1	1	1
Freeholder	0	1	5	4
Circle tenant	5	2	22	5
Other tenant	0	0	1	0
Other	0	0	1	0
Not given	1	1	2	0

The table above shows the breakdown of selections by tenure type. The chart below shows whether people support regeneration of the estate, having further analysed the responses of those who selected option 4 and those who did not select a specific option.



Question 2: What size of homes should be provided within the Ravensbury estate?

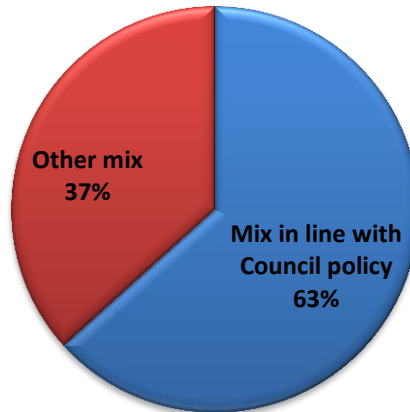
Question 2 seeks to understand the **size** of homes that people would like to see on the Ravensbury Estate. The question provides two options as follows:

Option 1 - mix of different size of homes: provide a mix of different size of homes consisting around 33% one bedroom, 32% two bedrooms and 35% three or more bedroom homes. This option reflects Merton's current policy to encourage a mix of dwelling sizes.

Option 2 - If you do not agree with this mix, how would you change it?

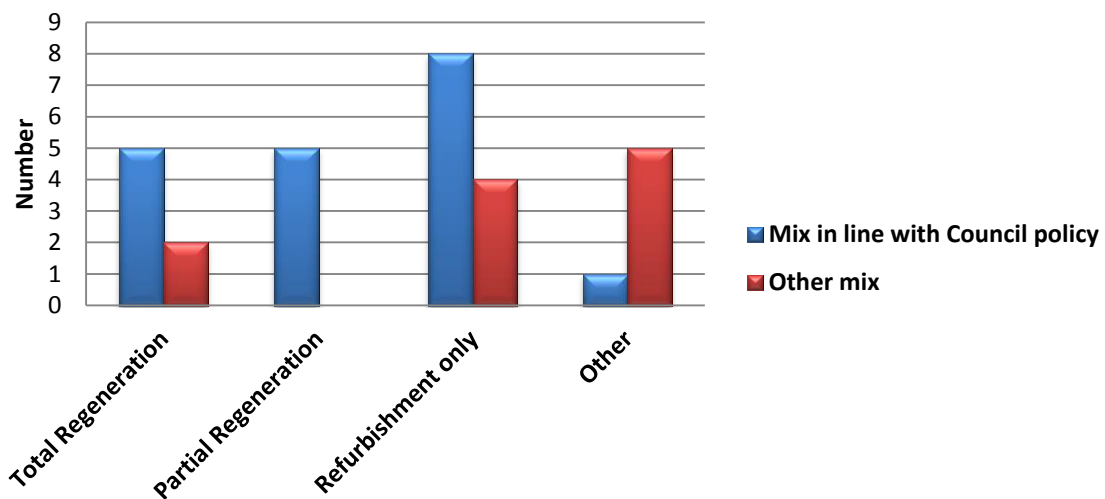
The Pie chart below shows which option respondents selected.

Q2. What mix of dwelling size should be on the Estate?



It is worth noting that respondents were encouraged to answer all questions, even if their answer to question 1 was not in favour of regeneration. The following bar chart shows the size of property wanted by respondents based on how they feel regarding regeneration.

Q2. Mix of size of homes people want by attitude to regeneration



Question 3: What type of homes should be provided across the estate?

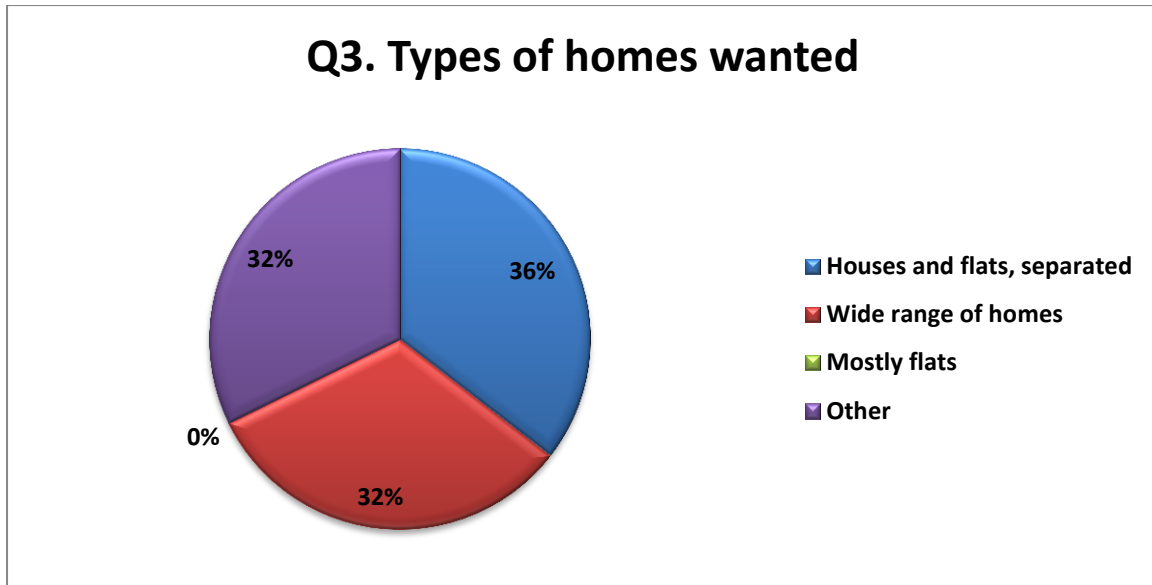
Question 3 seeks to understand the **types** of homes that people feel should be provided across the Ravensbury Estate. This question had four possible options as follows:

Option 1 - A mix of mainly houses and flats on different parts of the estate.

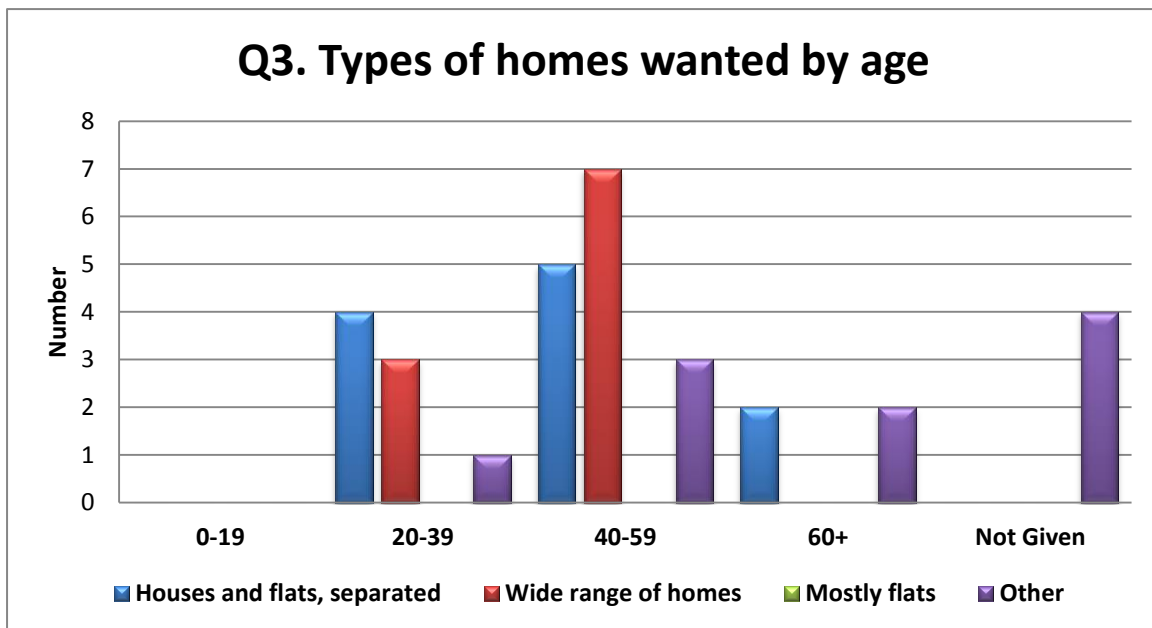
Option 2 - A wide range of homes including a mix of houses, flats and maisonettes

- Option 3** - Mostly flats
- Option 4** - Other, please state

The following pie chart shows how people responded to this question.



The following bar chart breaks the above information down by age of respondents.



Houses and flats separated a wide range of homes and 'other' secured a similar proportion of responses. Interestingly, nobody opted for mostly flats. Of the respondents who chose the 'other' option, the most common opinions given were to leave the estate as is, provide houses only and to provide buildings no greater than two storeys in height.

Question 4: How should building heights be distributed through the Ravensbury estate?

Question 4 tries to identify what **height** buildings on the Ravensbury Estate should be. This question had a range of choices as follows:

Option 1 - Evenly across the estate

Option 2 - Taller buildings around the edges. This option has two sub options as follows:

a) taller buildings facing Morden Hall Park

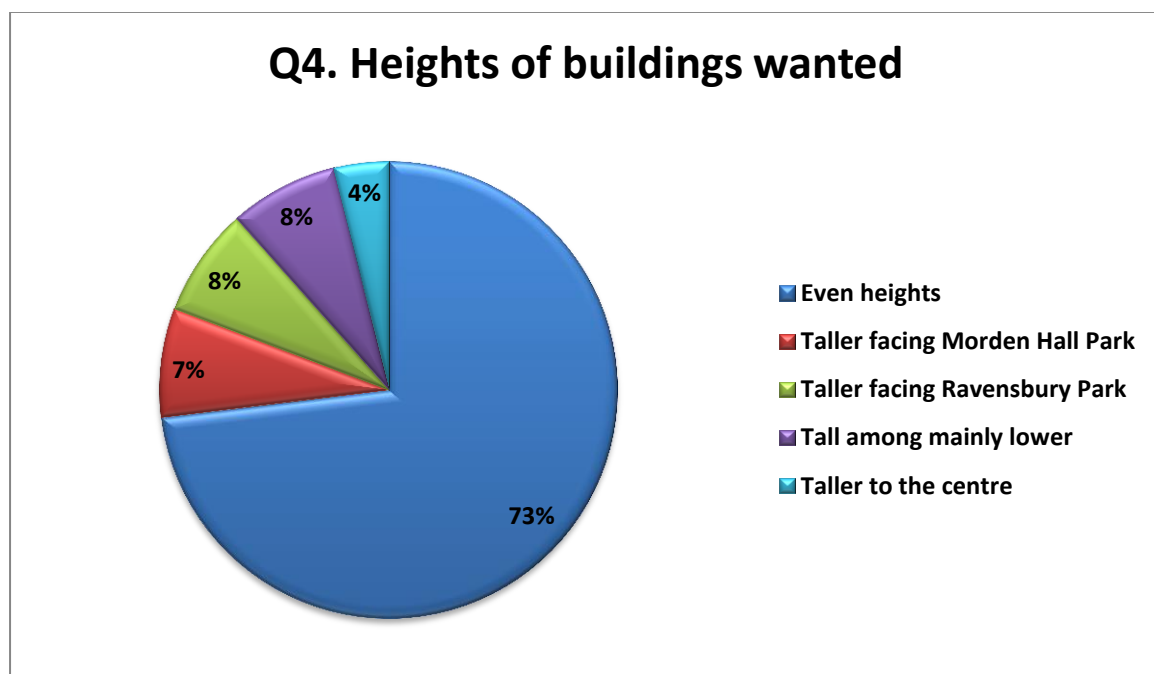
b) taller buildings facing Ravensbury Park and the River Wandle

Option 3 - Variety across the estate. This option had two sub options as follows:

a) some taller buildings evenly spread across the estate in general, amongst mainly lower buildings

b) taller buildings towards the centre of the site

The pie chart below shows how people responded to this question.



Nearly three quarters of people have opted for building heights to be even across the estate. The next most popular choices were for some taller buildings evenly spread across the estate in general amongst mainly lower buildings and taller buildings facing Ravensbury Park and the River Wandle, both gaining 8% of the respondent's choice.

Question 5: Are there any other issues or options we should consider regarding new homes?

Question 5 provided space for free text regarding thoughts on **other considerations regarding new homes**. The most common issues raised are as follows; consider communal areas, concentrate on Orlit homes only, heights of buildings, provide gardens for all properties, and the noise/disturbance during construction. Many respondents have

expressed a desire for the estate to be left as is.

Question 6: What type of outdoor space would you prefer to see within the estate?

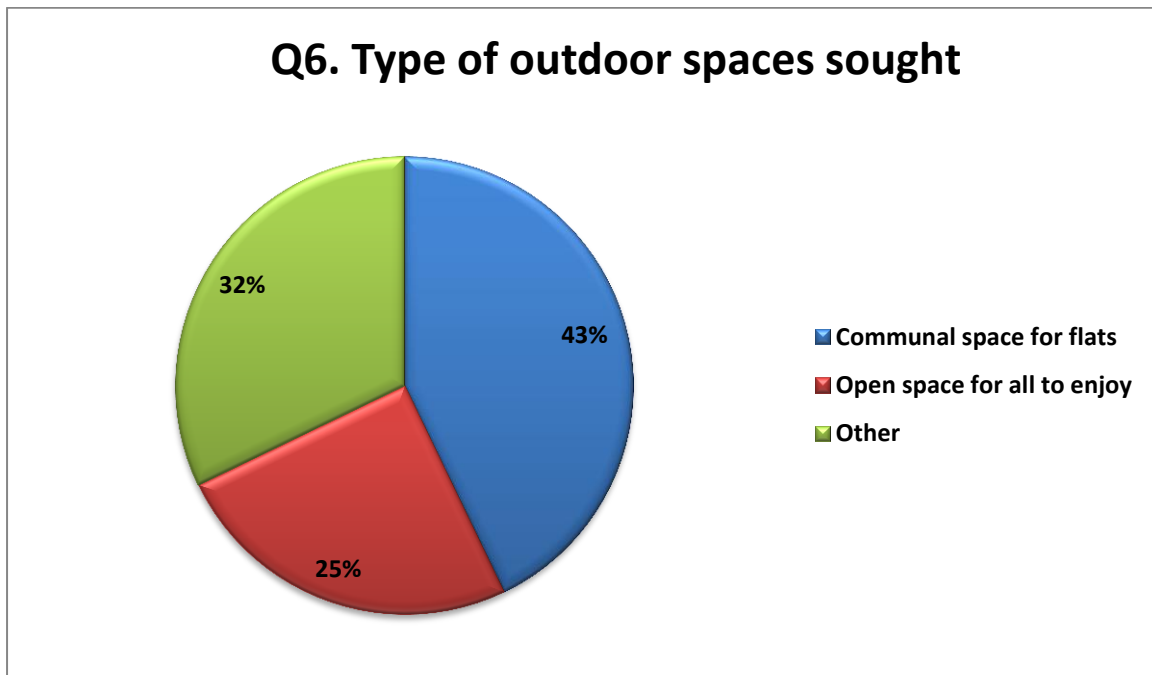
Question 6 looks at the **types of outdoor spaces** that respondents would prefer to see within the Ravensbury Estate. Three options were provided, as follows:

Option 1 - Concentrate on providing communal space for flats

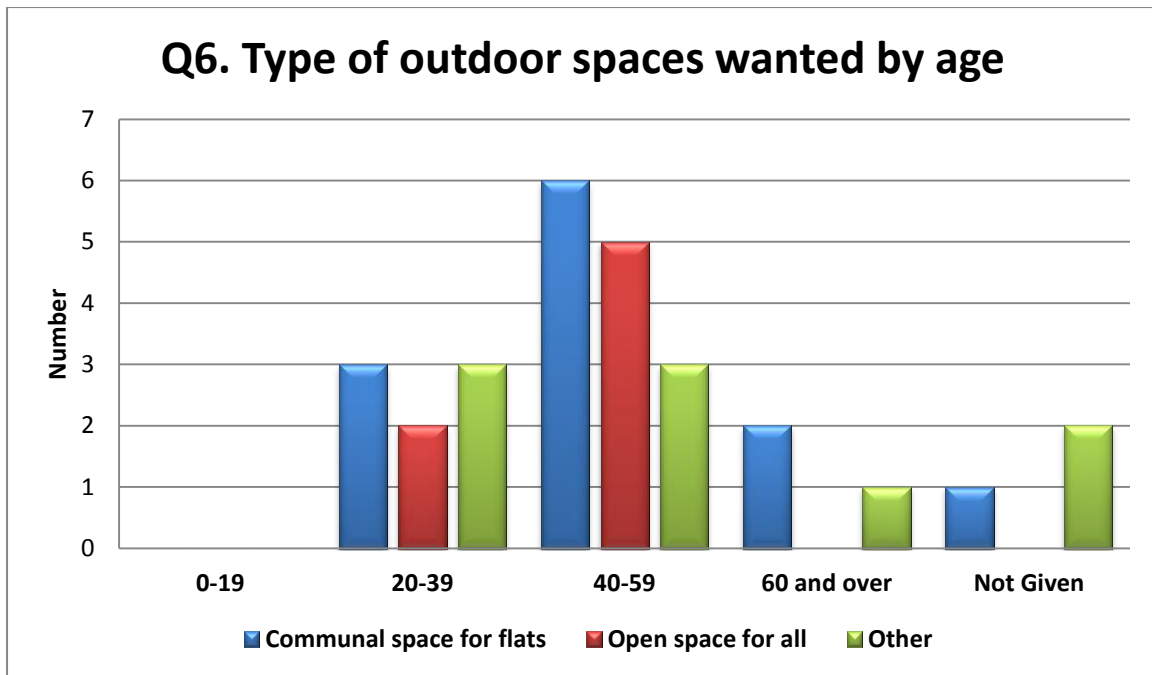
Option 2 - Provide a single public open space for everyone to enjoy

Option 3 - Other, please state

The bar chart below show how people responded to this question.



The following bar chart breaks the above information down by age of respondents.



43% of respondents have chosen the option for communal areas for flats. In no age group was another option more popular, although the 20-39 year old respondents wanted chose 'other' equal measure. 32% of respondents selected 'other' with the most common request being for things to be left as they are. Some respondents did not elaborate.

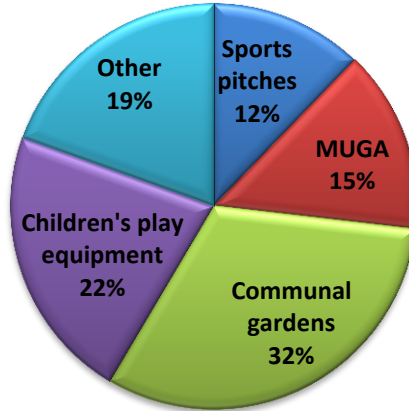
Question 7: What types of play areas and outdoor space would you prefer to see?

Question 7 asks what **types of play areas and open spaces** people would like to see within the Ravensbury Estate. This question provides five options, and specifies a maximum of two choices per respondent. The choices given are as follows:

- Option 1** - Sports pitches
- Option 2** - Multi-use games areas (MUGA)
- Option 3** - Communal gardens
- Option 4** - Children's play equipment
- Option 5** - Other, please state

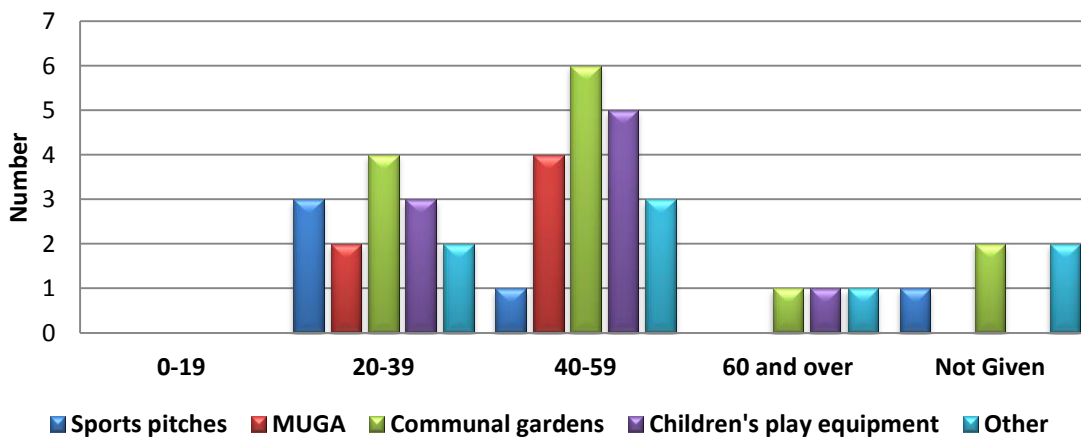
The Pie chart below shows how people responded to this question

Q7. Types of play areas and open spaces wanted



The bar chart below breaks this information down further by looking at responses by age group.

Q7. Types of play areas and open spaces wanted by age



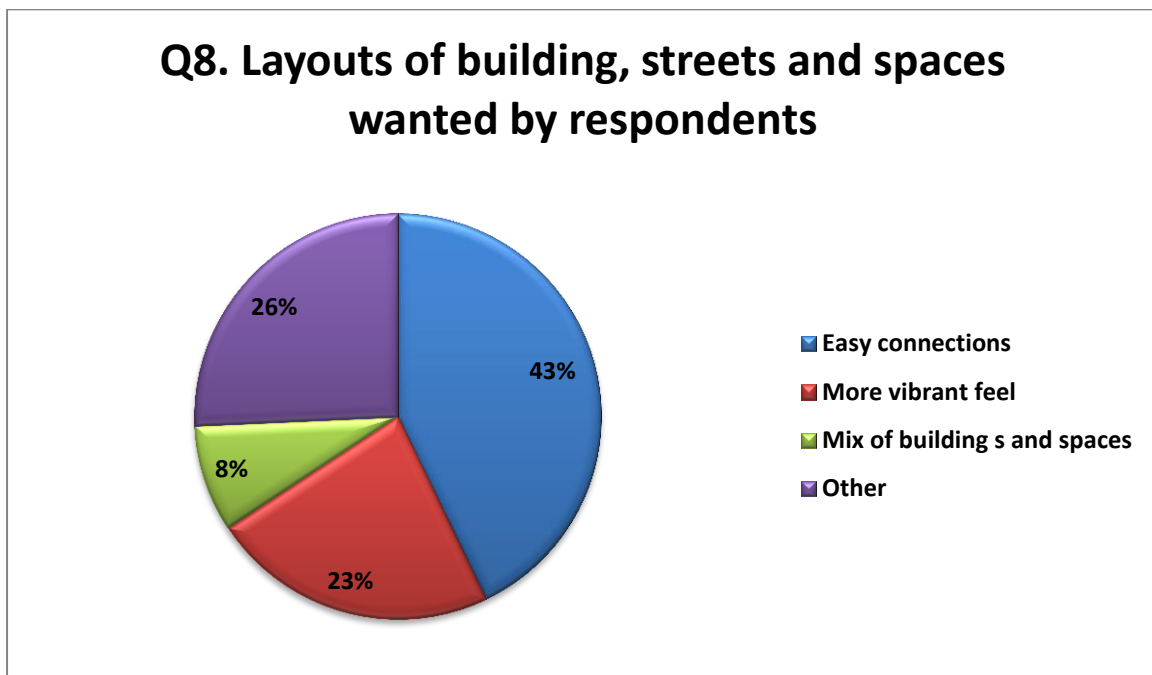
Communal gardens are the preferred option by 1 in 3 respondents. Children's play equipment was selected by 22% of respondents. No age groups selected any option more than communal gardens. Of those people who selected 'other', most responses did not elaborate. Comments made included no open spaces needed as there are two parks in close proximity and to leave things as they are.

Question 8: What do you think is important in deciding the layout of buildings, spaces and streets on the estate?

Question 8 seeks to explore what respondents feel are important in deciding the **layout of buildings, spaces and streets** on the Ravensbury Estate. This question provided four options, and specifies a maximum of two choices per respondent. The choices given are as follows:

- Option 1** - Making easy connections within the estate and to the surrounding area
- Option 2** – Create a more vibrant feel and character to the area
- Option 3** – Creating a mixture of types of buildings and spaces
- Option 4** – Other, please state

The pie chart below shows how people responded to this question.



Making easy connections with the surrounding area was the choice of 43% of respondents, more than any other option. More than 1 in 4 respondents selected 'other' with comments including the retention of the existing layout, and the loss of the cul-de-sac arrangement. Many respondents did not elaborate.

Question 9: Are there any other issues or options we should consider regarding the estate's open spaces and streets?

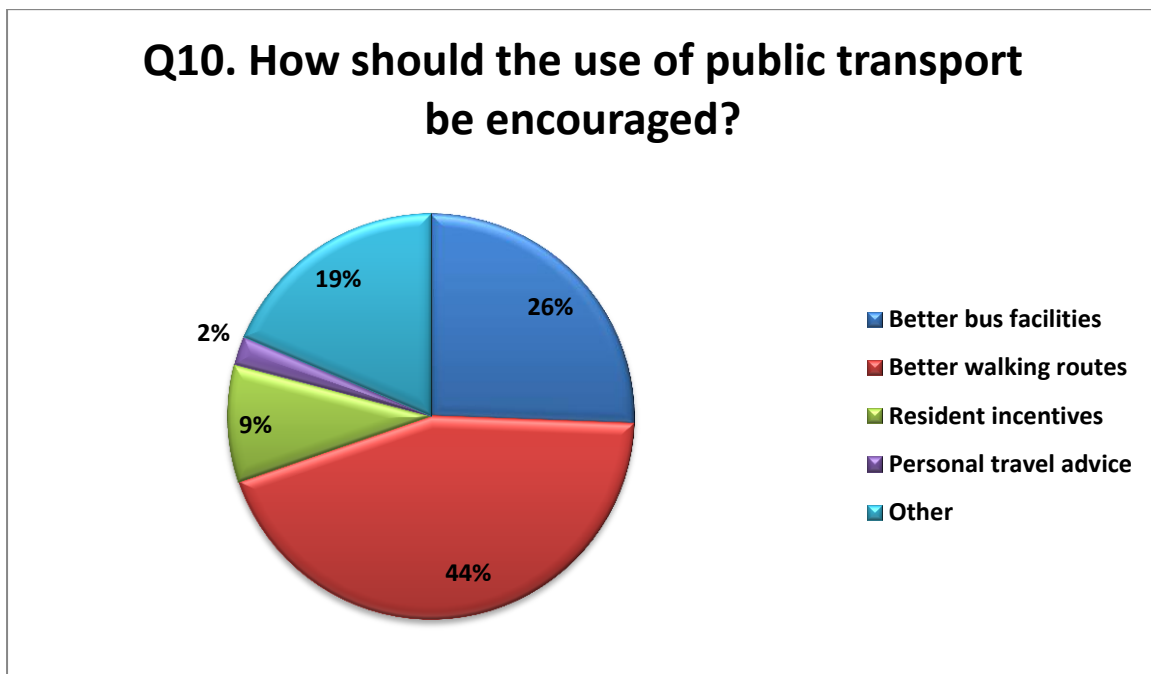
Question 9 provides an opportunity for respondents to provide their views on any other issues or options which should be given consideration regarding the estate's open spaces and streets. The most common issues raised are as follows; improved security, incorporate street trees/planting, street lighting, and maintenance of public areas.

Question 10: How should greater use of public transport be encouraged?

Question 10 asks how **greater use of public transport should be encouraged**. The question provides a choice of five options, with 'one or more' selections allowed. The options provided are as follows:

- 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, please state

The pie chart below shows how people responded.



Nearly half of respondents chose option 2, the provision of better walking routes, bus and tram stops, shopping areas, parks and community facilities. 26% of respondents want better bus facilities whilst only 2% would like to see personal travel advice provided. Of the respondents who selected the 'other' option, the most common suggestion was to leave things as they are.

Question 11: Walking and cycling are healthy lifestyle choices. How can we support this?

Question 11 asks how the Council can **support the choice of walking and cycling as modes of transport**. The question provides a choice of four options with 'one or more' selections allowed. The options provided are as follows:

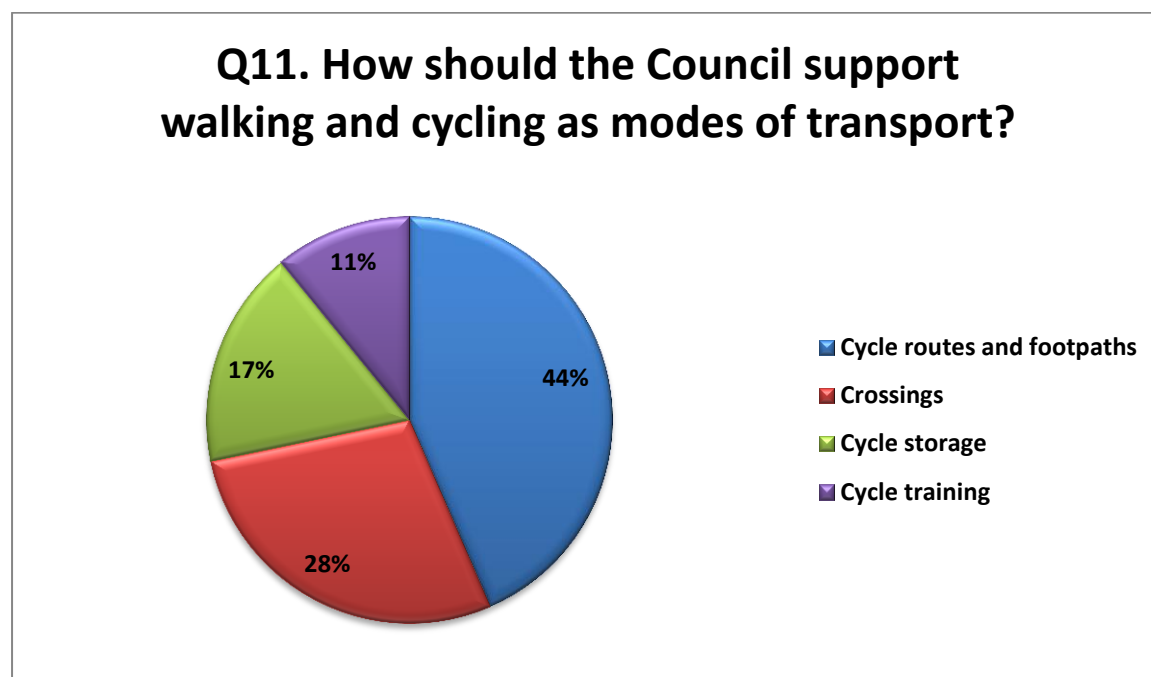
- Option 1** - Provide well-connected, attractive and safe cycle routes and footpaths

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

The pie chart below shows how people responded.



44% of respondents want well-connected, attractive and safe cycle routes and footpaths whilst 28% selecting safe and convenient crossings of busy roads and junctions.

Question 12: How should parking be managed?

Question12 asked how people think that **parking should be managed** on the Ravensbury Estate. The question provides three options, with 'one or more' selections allowed. The options provided are as follows:

Option 1 - Introduce parking controls

Option 2 - No parking restrictions

Option3 - Reduce the need for parking spaces by providing alternative ways for residents to access a car when needed

The bar chart below shows how people responded to this question.



There is an even split between those people that want to see parking controls introduced and those who want no restrictions at all.

Question 13: Are there any other issues or options we should consider regarding the transport?

Question 13 provided a space for respondents to identify any **other issues or options which should be considered regarding transport**. The most common themes identified are as follows; improving pavement widths, improve parking and leaving the existing as is.

Question 14: Should new community facilities be provided within Ravensbury estate?

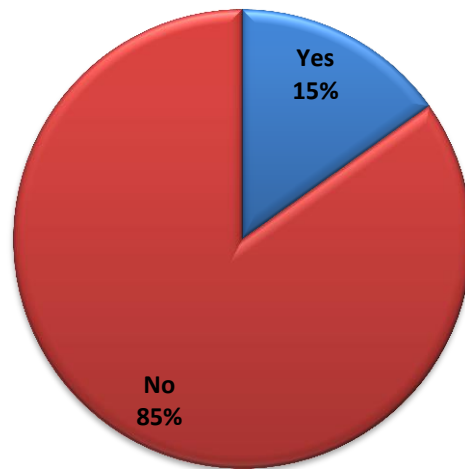
Question 14 seeks to identify whether people think there are sufficient **community facilities** on the Ravensbury Estate, and if not what should be provided. The question provided two options, as follows:

Option 1 - Yes, we need more community facilities such as:

Option 2 - No, the existing community facilities on the estate and nearby are enough

The pie chart below shows how people responded.

Q14. Are more community facilities needed?



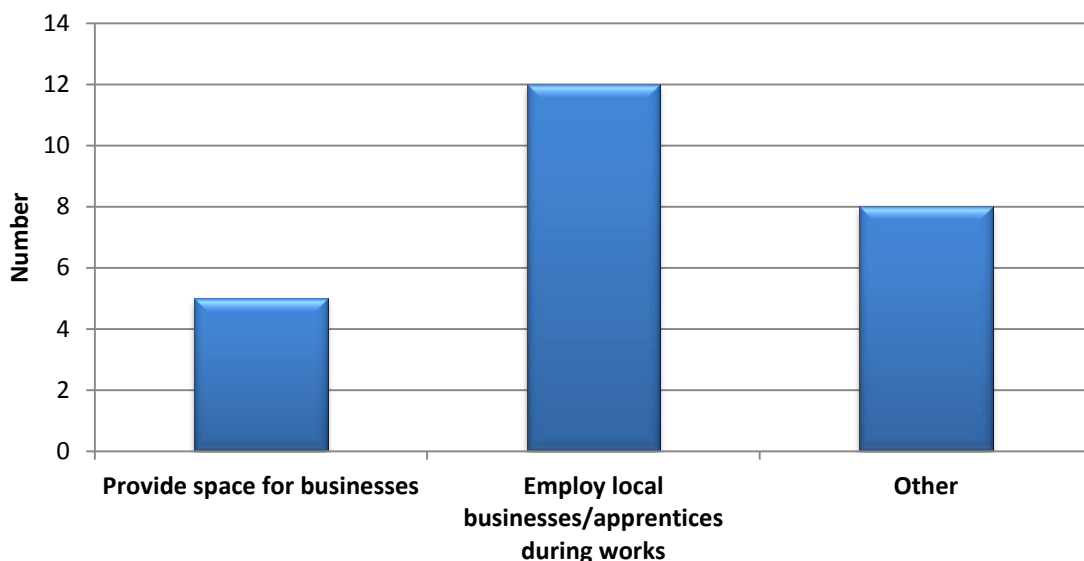
An overwhelming 85% of respondents feel the existing situation is adequate.

Question 15: How could refurbishment or regeneration support existing and new employment?

Question 15 asks how regeneration or refurbishment could **support new and existing employment**. The question provides three options with 'one or more' answer sought. The options are as follows:

- 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, please state

Q15. How can new businesses be supported?



12 respondents want to see local businesses and apprentices employed through the refurbishment/regeneration and this is, by some way, the most selected option. The next most popular option received 8 selections and this is for the 'other' option which primarily consisted of people stating that things should be left as they are.

Question 16: Are there any other issues or options we should consider regarding social and economic opportunities?

Question 16 allowed respondents to provide their views on any **additional issues or options that should be considered regarding social and economic opportunities**. The most common themes raised are as follows; on-site caretaker and no need for regeneration.

2.6. Stage 2 – Draft Estates Local Plan

The responses from during the Issues and Options stage were considered and used to formulate the draft Estates Local Plan with detailed policies for each estate. The consultation period for the draft ELP was from 1st February to 18th March 2016. Consultees were given the opportunity to comment on the detailed document put together by the council that outlined specific policies that would guide any regeneration proposals that may come forward for the estates of Eastfields, High Path and Ravensbury. Over 300 responses to the second stage of consultation were received. A qualitative analysis follows.

2.7. Consultation methods (February – March 2016)

Stage 2	
Consultation methods advised in Merton's adopted SCI 2006	Consultation methods used
Press release: local / trade press	Press release 09 February 2016
Council website or associated / relevant websites.	Details of the consultation were placed on the Council's dedicated webpage. It explains what the consultation what about, how to submit comments with contact email address and telephone if there was any questions.
Leaflets on the Draft Estates Local Plan	The Council produced leaflets which promoted the drop in sessions for the public and other interested parties. These were available from Merton's reference libraries and Civic Centre.
Outreach	<p>Listed below are the meetings held with the estates residents and council officers, informing them of the Plan, explaining the next stages and answering questions they had relating to the development of the estates.</p> <p><u>Pre Engagement</u> 27/08/15 Ravensbury Residents Association 22/10/15 Ravensbury Residents Association</p> <p><u>Engagement</u> 01/02/16 Ravensbury Residents Association</p>

	<p>13/02/16 Eastfields 24/02/16 High Path 27/02/16 High Path 27/02/16 Ravensbury 28/02/16 High Path 05/03/16 High Path 08/03/16 Ravensbury</p> <p>The scheme was taken to the council's Design Review Panel on 14th July 2016 (High Path) and 14th September (Eastfields) 2016</p>
Direct mailing	<p>The Council direct mailed the estate residents, stakeholders in the wider area and statutory consultees</p> <p>High Path Estate 3439 Eastfields Estate 1519 Ravensbury Estate 601 Stakeholders 35 (letters and emails).</p>
Dedicated phone and e-mail	<p>The Council publicised a dedicated Estate Plan telephone number - 0208 545 9639 for the public to call if they had any questions regarding the consultation (including translation and large print copies)</p>
Attending Area Forums	<p>4th February 2016 Morden Community Forum 15th March 2016 Mitcham Community Forum</p>
Councillor surgeries	<p>High Path Residents and Councillors 28th February 2015</p>

2.8. Quantitative Analysis - Eastfields Estate

The following sets out a summary of consultation responses received on the council's draft Estates Local Plan for the Eastfields Estate, which took place between February – March 2016 and the council's response to the raised issues.

Copies of the actual responses received can be accessed here:

Proposed specific revisions, informed by the council's consideration of the consultation feedback to the Estates Local Plan are set out at the end of this document.

ISSUES SUMMARY

General

- A general concern about the condition of properties and the poor standards of insulation and problems with damp etc.
- A sense that the Estates Local Plan is a bit vague and based on assertions rather than facts.
- Some feel that Y-Cube is a good model for social housing.
- A number of respondents clearly support the regeneration plans with some saying get on with it quickly.
- Also, a number of residents are in favour of the refurbishment of existing buildings and feel full redevelopment is not necessary.
- Concern about timescales and the length of time regeneration will take.
- A concern that residents are not being listened to and suspicion about the motives for the regeneration, and that it is not particularly for the benefit of residents.
- Some confusion between the council local plan and Circle masterplan.
- Concern there are no back-up plans to regeneration.

Townscape

- Some preference for flats in the middle and houses around the edge of the estate.
- Some concern about overlooking with taller buildings.
- Buildings must be high quality, be traditional in style and design out crime.

Street Network

- A desire for traditional streets.

Movement & Access

- A mix of views on whether linking up Acacia Road, Mulholland Avenue and Clay Avenue is a good idea. Some think it will improve access and traffic can be managed by speed humps etc. Others think it will lead to rat running, a reduction in road safety and anti-social behaviour.
- A concern that not enough parking will be provided and that all homes should have at least one parking space.
- Some support for parking controls and underground parking provision.

Land Use

Open Space

- Some residents value the isolated nature of the open space as it is calm and tranquil.
- Some residents feel that properties whose fronts face open space is good for families and child safety.

Environmental Protection

- A suggestion that tree planting, swales etc. be used to create green corridors through the estate.

Landscape

- Support for existing trees to be retained and new ones planted.
- The use of landscaping for defensible space.
- Some support for the existing open space as it is seen as secluded and calm and used by residents.

Building Heights

- Some concern about building heights, though not an overriding one. Some preference for a maximum of 2 storeys despite the existing buildings being 3 storeys, other preferences for maximum of 4 storeys.
-

COUNCIL RESPONSES (to issues raised by respondents)

EP E1: TOWNSCAPE

The Estates Local Plan is strategic and is appropriately pitched concerning the level of detail provided. It is inappropriate to be too prescriptive regarding issues of materials and detailed design. Should regeneration go ahead, development proposals will be required to adhere to all requirements set out in the Statutory Development Plan for the borough which the Estates Local Plan will become part of upon adoption.

All new buildings will be built according to relevant building regulations, design guidance and good practice. This includes communal entrance areas, entry systems and the provision of lifts.

EP E2: STREET NETWORK

Street networks are indicative and intended to allow for the creation of traditional, flexible streets that serve all users well. This will ensure no one mode of transport is inappropriately dominant, though an emphasis on priority may change depending on the purpose of the street. Street networks are different from vehicle movement. Revisions to text and diagrams of policies EP R2 and EP R3 will be reviewed to more effectively clarify this difference and help avoid confusion.

It is important to create a clearly understandable and accessible environment across the borough to support its sustainable transport and urban design objectives outlined in policies in the Core Strategy, Sites and Policies Plan and London Plan. Creating a clearly understandable street network is considered key to this. The council believes this is consistent with reducing the likelihood of anti-social behaviour by increasing natural surveillance. Should regeneration go ahead, any proposals will need to demonstrate how they satisfy 'secured by design' principles at the planning application stage. The council believes this can be successfully balanced with maintaining a welcoming character for the area and community safety.

EP E3: MOVEMENT & ACCESS

Car parking should be provided in accordance with relevant parking standards and transport policies aimed at promoting sustainable means of travel. Should regeneration go ahead, the council will expect applicants to consider the introduction of appropriate parking management measures.

Proposals to link up Acacia Road, Mulholland Avenue and Clay Avenue as a through route will not cause rat running through the estate, as this route does not and will not pass through the estate. The council believes that, with the right form of traffic management, this proposal could benefit residents of the estate by improving accessibility. Development of any such proposals will be subject to appropriate traffic modelling, detailed design and statutory consultation on possible options.

EP E4: LAND USE

Should regeneration go ahead, a higher density of development will be required in order to meet a range of criteria, including viability, creating additional homes and to promote sustainable development. The council believes this can be achieved sensitively, without unduly compromising the key positive characteristics of the local area.

In assessing appropriate densities, the council will have regard to the London Plan Density Matrix, and apply it appropriately to the estate. Appropriate density is a guide, and is based on the type of area (suburban for Eastfields), public transport accessibility, and adhering to other planning policies regarding context and design. Planning and building regulations will be applied as with all new development to ensure existing and new buildings have sufficient privacy, daylight and sunlight. No development will be permitted that results in inadequate privacy, daylight and sunlight.

EP E5: OPEN SPACE

Play Space will be provided in accordance with the Mayor of London's Play and Informal Recreation SPG (2012), which allows for public consultation.

Open space will be provided according to relevant policy guidance. In general, a central open space is suggested, though in a different format to the existing layout, being based on a traditional street network. Any new open space will be designated as such and become protected in the Local Plan.

EP E6: ENVIRONMENTAL PROTECTION

Details of new landscaping, plant and tree species will be prepared by suitably qualified experts. Residents will be consulted on this during the planning application stage. Applicants will also be encouraged to engage on such issues with the local community before submission of a planning application.

Development in areas of risk of flooding must undertake an appropriate Flood Risk Assessment as required by the National Planning Policy Framework (NPPF) and this must demonstrate how flood risk will be managed now and over the development's lifetime, taking into climate change into account and have regard to the vulnerability of the users or occupants of the site. The Flood Risk Assessment must establish the risk of flooding to and from the development from all sources, and whether flood risk will be increased elsewhere, taking into account any required mitigation measures.

EP E7: LANDSCAPE

The council agrees with the general aim to retain all existing mature trees where possible. It also supports planting new trees integral to new development including the creation of new green chains. There is scope to make this more specific in Policy EP E7.

The Council agrees with and supports the use of hedges and vegetation as a means of providing defensible space to houses and flats. This is an integral part of creating

an attractive street that also benefits wildlife and provides natural drainage.

EP E8: BUILDING HEIGHTS

Proposals regarding building heights have been developed based on a thorough analysis of the local context. The existing estate has a very uniform building height, which is as much an architectural statement as a decision on what is an appropriate building height. The council therefore does not feel it is inappropriate for some new buildings on the estate to be taller than the existing ones, as the whole architectural approach is likely to be completely different from the current design. However, the key message regarding building heights is that the taller buildings should be around larger open spaces and mature trees, and main routes and intersections. A balance must be achieved between respecting the landscape setting, the need to provide more homes, and ensuring any new development is viable. It is therefore considered appropriate to amend the policy wording to refer to how taller and lower buildings should be located around the estate, with references to storey heights removed.

1. PROPOSED CHANGES

Street networks are different from vehicle movement and should not be confused. Text and diagrams for policies EP E2 and EP E3 could be reviewed to clarify the difference and avoid confusion. Minor amendments to Policy EP E2 and addition to justification and map to clarify distinction between defined streets and vehicular movement. Addition to Policy EP E3 justification and map to highlight access and clarify distinction between defined streets and vehicular movement.

Include text at an appropriate place in the document encouraging applicants to consult with the local community on a range of issues before submission of a planning application, including landscaping, plant and tree species. Addition to introduction in Part 04.

Amend policy EP E7 to make specific reference to the general aim to retain all existing mature trees. Policy EP E7 g) covers this point, no change. Amendment to map to show mature tree location.

Ensure that it is clearly stated that no development will be permitted that increases flood risk, and that development should seek to reduce the risk of flooding. Addition to Policy EP E6 justification outlining process to ensure development which increases flood risk will not be permitted. Additions to glossary to explain sequential testing and flood risk assessment.

Amend the wording of policy EP E8 to refer to how taller and lower buildings should be located around the estate, with references to storey heights removed. Graphics on maps should be altered and improved and encompass the garages part of the estate within the boundary on the plan. Policy EP E8 and map amended to illustrate where taller and lower buildings should be located around the estate.

Include a statement either as part of policy EP E3 or its justification that car parking will be provided according to relevant parking standards. New paragraph added to justification of Policy EP E3

Complete the unfinished sentence at the end of para. 3.24. Typographical error corrected para. 3.24

Add a reference on monitoring progress in Delivery & Implementation section. The following text has been added after para. 5.4:

“The delivery of Merton's Estate's Local Plan will be monitored via the Annual Monitoring Report. Assessment of delivery of the Plan will be monitored to determine whether and what intervening action needs to be taken.”

2.9. Quantitative Analysis - High Path Estate

This section sets out a summary of the written consultation responses received on the council's draft Estates Local Plan for the High Path Estate, which took place between February and March 2016.

Many of the 106 respondents used the free text section of the questionnaire or wrote to the council explaining what they liked and disliked about the High Path section of the draft Estates Local Plan. This section summarises these written responses.

It has not always been possible to categorise these letters, emails and free text responses neatly under each of the eight policy headings so we have amalgamated the summarised responses into groups of several policies and one of general comments.

Townscape;

- Townscape: set back along Merton High Street, prevent wind tunnel, not overshadow Merton High St, protect existing trees, could allow limited parking for local shops, attractive landscaping, improved cycle lanes, cycle parking
- Traditional building materials should be used, brick, wood. Not glass
- Want to ensure building quality

Street Network; Movement and Access; Land Use

- Parking for residents only please.
- All homes need parking, and space for visitors
- Less traffic please
- No rat running along any new streets
- Abbey Road:
 - Address rat running
 - Support and rejection of link to Merantun way
- Mill Road already a rat run
- Support for traditional street pattern.
- No need for new roads through the estate
- Concern that new streets will mean more traffic and pollution and rat running

Open Space; Environmental Protection; Landscape

- Solar panels please
- Trees, balconies all positive for residents quality of life
- Want proper, secure and clean bin storage
- Want open space provided, concerns with demolishing people's houses to provide it
- General support for smaller spaces over one large open space
- Support for trees but not universal support for the trees /linear green space along Merton High Street
- Support and rejection for obvious sustainable measures such as CHP and green walls. Connection between high service charges and CHP

Building heights

- Must be in proportion with nearby buildings, especially Merton High St
- Must not create wind tunnels or restrict sunlight
- Lower building heights wanted especially along Merton High Street. Also raised for Abbey Road and High Path.

General issues

- Restrict commercial vehicles off morning peak for better quality of life

- Estate residents opinions matter more
- Draft Local Plan would be good for current residents
- Want elevators for anything above 2 storeys
- Want CCTV
- Concern on how it is possible to build near the tube network
- Want more privacy and less noise
- What will happen to me if this goes ahead?
- Can utilities cope with more homes?
- If new estate, will it be looked after and managed better?
- Strong opinions on Circle Housing Merton Priory
- Mixed views on timescales (regardless of whether or not the respondent supported regeneration):
 - people keen for a final decision to be made and just get on with it, it has all taken too long and there has been way too much consultation
 - others want to know more about their specific options (particularly related to the residents offer), what will happen to them, when can they see the final plan for the estates and how can they influence it, if regeneration happens, when will they be directly affected?

PROPOSED CHANGES TO ALL POLICIES AND MAPS ON HIGH PATH

Street networks, movement and access Street networks are different from vehicle movement; having a new street does not necessarily mean that cars will be able to use it two ways at all times. Draft Estates Local Plan is not clear that not all the new streets proposed will be open to two way traffic all the time. Text and diagrams for policies EP H2 and EP H3 could be reviewed to clarify the difference and avoid confusion. amendments proposed to Policy EP H2 and H3 and addition to justification and map to clarify distinction between defined streets and vehicular movement. Amend draft Plan to strengthen proposals to support Merton High Street, including landscaping and context. Continue to work closely with Transport for London on movement and access.

Environmental protection and flood risk Ensure that it is clearly stated that no development will be permitted that increases flood risk, and that development should seek to reduce the risk of flooding. Addition to Policy EP E6 justification outlining process to ensure development which increases flood risk will not be permitted. Additions to glossary to explain sequential testing and flood risk assessment.

Building heights Amend the wording of policy EP H8 to refer to how taller and lower buildings should be located around the estate. Strengthen design policies, especially how buildings must be set within their local context, References to specific storey heights removed. Graphics on maps should be altered and improved if necessary.

Policy EP E8 and map amended to illustrate where taller and lower buildings should be located around the estate.

Land use, environmental protection, landscaping Provide greater clarity on landscaping and trees throughout the plan. Change policy HP E7 a) to be specific about augmenting tree planting fronting Merton High Street in a similar way to it is stated for Hayward Close. Amend b) to improve the wording. Add reference to tree planting at para. 3.158. Amendments to Policy HP E7 and map amended to illustrate tree planting fronting Merton High Street.

Further engagement on specific details prior to planning applications Include text at an appropriate place in the document making it clear that the council will expect the developer to consult with the local community on a range of issues before submission of a planning application, including landscaping, plant and tree species. Addition to introduction in Part 04.

Managing concerns on and impact of construction Ensure it is clear in the Plan that council will manage the impact of construction through planning conditions and any other means at its disposal including other legislation and guidance on working practices. Paragraph added to part 05 delivery and implementation.

2.10. Quantitative Analysis - Ravensbury Estate

The following sets out a summary of consultation responses received on the council's draft Estates Local Plan for the Ravensbury Estate, which took place between February – March 2016 and the council's response to the raised issues. Copies of the actual responses received can be accessed here:

<http://www.merton.gov.uk/environment/planning/planningpolicy/localplan/estatesplan/ravensbury-estates-plan.htm>

Proposed specific revisions, informed by the council's consideration of the consultation feedback to the Estates Local Plan are set out at the end of this document.

ISSUES SUMMARY

General

- A belief that there is not much wrong with the estate, it just needs better management, otherwise, things should be 'left just as they are'. This feeling is much stronger than with responses for Eastfields and High Path
- A distinct sense of 'consultation fatigue', some confusion between Circle plans and the council's Local Plan, and criticism of how some consultation has been undertaken.
- A feeling that the communication and consultation from both Circle and the council has been poor, uncoordinated and very stressful for residents. It should have been far better.
- Despite a number of criticisms, there is some underlying support for much of what is in the draft Local Plan, though there is much scepticism about how robust it is.
- A concern that residents are not being listened to and suspicion about the motives for the regeneration, and that it is not particularly for the benefit of residents.
- More people living on the estate will change its character for the worse.
- Some confusion between the main estate and the garages site and how they relate to each other. They are separate applications yet the garages site is included in the boundary for the estates local plan.

Townscape

- Opposition to changing the internal layout of the ground floor flats in Ravensbury Court.

Street Network

- Fear of increased crime and anti-social behaviour and that it will increase if

links into the estate are improved and new ones created.

- Fear that improved links with the surroundings will undermine the isolated feel of the estate, and that less links would be better, in order to protect this and reduce the risk of crime.

Movement & Access

- Fear that the proposals are will result in through vehicular routes and rat-running.
- Concern that adequate parking will not be provided. Belief that more parking is needed, including for residents work vehicles.
- Improve security by having gated access to the estate.

Land Use

- Opposition to changing the internal layout of the ground floor flats in Ravensbury Court.
- A fear that new buildings and increased density will result in loss of amenity, daylight and privacy.

Open Space

- General feel that no new public open space or play space is necessary.

Environmental Protection

- Fear of increased risk of flooding caused by more development and that flood defences must be improved as part of the development.

Landscape

- Fear for the loss of natural habitats and the isolated, high-quality landscape of the estate due to intensification and more taller buildings.
- A concern that taller buildings will remove views of the surrounding trees and the tree line around the estate.

Building Heights

- Fear of over-development and of buildings that are too tall and which will destroy the landscape character of the estate.

COUNCIL RESPONSES (to issues raised by respondents)

EP R1: TOWNSCAPE

The Local Plan is strategic in pitch. It is inappropriate to be too prescriptive regarding issues of materials and detailed design. Should regeneration go ahead,

these raised detailed issues will be required to be developed by applicants in conformity with the design code guidance in the Local Plan and at the planning application stage, which will include public consultation). This should be in accordance with the Estates of the Local Plan as well as relevant policies in the Core Strategy, Sites and Policies Plan and London Plan.

The Local Plan is strategic in pitch. It is inappropriate to be too prescriptive regarding how proposed designs should respect and draw design inspiration from existing nearby buildings of high quality. Should regeneration go ahead, these issues will be required to be developed by applicants in conformity with the design code guidance in the Local Plan and at the planning application stage. This should be in accordance with the Estates Local Plan the Core Strategy, Sites and Policies Plan and London Plan.

The reference in the further guidance to policy EP R1 regarding re-orientating ground floor flats of Ravensbury Court are suggestions and not requirements. The purpose of this suggestion is to provide front doors or patio doors directly onto the street to increase activity and natural surveillance as well as the ability to provide some private garden space and encourage use of the communal green space. Any such proposals would need to be agreed by the land owners and residents.

EP R2: STREET NETWORK

Street networks are indicative and intended to allow for the creation of traditional, flexible streets that serve all users well. This will ensure no one mode of transport is inappropriately dominant, though an emphasis on priority may change depending on the purpose of the street. Street networks are different from vehicle movement and should not be confused. Text and diagrams for policies EP R2 and EP R3 could be reviewed to clarify the difference and avoid confusion.

It is important to create a clearly understandable and accessible environment across the borough to support its sustainable transport and urban design objectives outlined in the Core Strategy, Sites and Policies Plan and London Plan. Creating a clearly understandable street network is considered key to this. The council believes this is consistent with reducing the likelihood of anti-social behaviour by increasing natural surveillance. Should regeneration go ahead, any proposals will need to demonstrate how they satisfy 'secured by design' principles at the planning application stage. The council believes this can be successfully balanced with maintaining the secluded feel of the estate and community safety.

The council does not believe that the retention of the parallel Morden Road access lane is the most appropriate or efficient use of this space for parking. The access road is not designed as, nor does it operate as a shared space and is not well suited

as a safe, segregated cycle route. Parking could be accommodated in a similar manner to the north-facing houses on Morden Road, without the need for a separate access road. This would also allow for an increase in tree planting to soften the edge of the estate by extending the park vegetation into it, as well as providing a safe, segregated cycle route.

EP R3: MOVEMENT & ACCESS

The council agrees with residents' concerns for maintaining the quiet, enclosed feel of the estate. This is built-in to the strategic policies in the Local Plan. The estate however, does not exist in isolation and must be seen as part of its surroundings. Existing connections to the surroundings can be improved to encourage sustainable modes of travel, such as walking, cycling and safer, more direct and attractive routes to bus and tram services. This is in accordance with well-established existing Development Plan policies on sustainable transport. The provision of a more convenient route across the River Wandle and wider, better overlooked paths between the estate and Ravensbury Park are examples of how this can be achieved. These measures will also benefit residents of the estate. The council believes this can be successfully balanced with maintaining the secluded feel of the estate and will not make the estate less safe.

The Local Plan is not promoting any new vehicular access into the estate, the creation of any through route or any situation that would allow vehicles to 'rat run'. It is however, promoting improved links for pedestrians and cyclists between the estate and Morden Road in the vicinity of the existing parallel access road off Morden Road. This is part of the strategic pitch of the Local Plan which is intended to convey an idea, rather than define a specific alignment or number of streets. These streets would meet Morden Road, but not allow for through vehicular traffic (except for emergency vehicles).

The council analysis of the three ***existing*** pedestrian paths from Rutter Gardens (to Morden Road), Ravensbury Grove and Hengelo Gardens (into Ravensbury Park) shows that they are overgrown, narrow, poorly lit and have poor natural overlooking for much of their length as they pass from the estate to either Morden Road or the main pedestrian path through Ravensbury Park. It is the council's view that this is poor in terms of perceptions of safety and works against encouraging people to adopt more sustainable means of movement. Improving sight lines by widening paths, reducing overgrown vegetation and providing natural surveillance by ensuring new development faces paths, can be successful means of addressing these issues.

Car parking should be provided in accordance with relevant parking standards and transport policies aimed at promoting sustainable means of travel. Parking provision will also need to be balanced carefully with the need to protect the landscape quality

of the estate. Should regeneration go ahead, the council will expect applicants to consider the introduction of appropriate parking management measures.

EP R4: LAND USE

Should regeneration go ahead, a higher density of development will be required in order to meet a range of criteria, including viability, creating additional homes and promotion of sustainable development. The council believes this can be achieved sensitively, without unduly compromising the key positive characteristics that make the estate unique.

In assessing appropriate densities, the council will have regard to the London Plan Density Matrix, and apply it appropriately to the estate. Appropriate density is a guide, and is based on the type of area (suburban for Ravensbury), public transport accessibility, and adhering to other planning considerations regarding context and design.

Planning and building regulations will be applied as with all new development to ensure existing and new buildings have sufficient privacy, daylight and sunlight. No development will be permitted that results in inadequate privacy, daylight and sunlight.

The Local Plan Policy EP R4 is clear about the proposed land use. However, some of the supporting text could provide clearer guidance regarding suggested other uses. The likelihood of these uses forming part of any future development proposals is unclear in the absence of any assessment of demand which would likely take place at the planning application stage. It is therefore considered appropriate to amend the wording of the supporting text to reflect the clarity of the policy wording.

EP R5: OPEN SPACE

Play Space will be provided in accordance with the Mayor of London's Play and Informal Recreation SPG (2012), which allows for public consultation.

Key mature trees and open spaces within the estate at Hengelo Gardens and in front of Ravensbury Court, do not form part of any potential regeneration in the draft Local Plan these spaces are proposed to be retained, though the spaces could be modified to include flood mitigation measures. Regeneration, should it go ahead, allows for the creation of new open space and landscaped areas that extend vegetation into the estate and 'build-in' new flood attenuation measures. However, there are no new public open spaces proposed purely on the basis of need.

EP R6: ENVIRONMENTAL PROTECTION

Details of new landscaping, plant and tree species will be prepared by suitably qualified experts. Residents will be consulted on this during the planning application stage. Applicants will also be encouraged to engage on such issues with the local community before submission of a planning application.

Development in areas of risk of flooding must undertake an appropriate Flood Risk Assessment as required by the National Planning Policy Framework (NPPF) and this must demonstrate how flood risk will be managed now and over the development's lifetime, taking climate change into account and have regard to the vulnerability of the users or occupants of the site. The Flood Risk Assessment must establish the risk of flooding to and from the development from all sources, and whether flood risk will be increased elsewhere, taking into account any required mitigation measures.

Parts a) and b) of Policy EP R6 make balanced statements regarding appropriate flood mitigation and SuDS, introducing swales as one of a range of possible measures. However, part d) and the accompanying map specifically propose swales as the key part of this strategy. This could appear as an inconsistency and the wording of the policy and the map could be amended accordingly to remove this inconsistency and ensure a clear policy message.

The supporting text to Policy EP R6 Environmental Protection contains some inconsistencies and ambiguities and would benefit from amendments to address these in order to improve clarity and understanding for residents.

All works to the River Wandle and its habitat will be undertaken in accordance with the requirements of the Environment Agency and appropriate impact assessments and surveys regarding habitats. Appropriate conditions to any planning permissions will ensure appropriate working practices. The general aim is to better manage the river environment for the benefit of all, including flood mitigation, habitat protection and use as a leisure resource.

EP R7: LANDSCAPE

The council believes that it is the views towards the surrounding tree canopy, from a range of locations, which are the defining landscape elements of its secluded nature, rather than any incidental open space, as they terminate views and thus create the seclusion.

It is a strategic objective of the council to enhance the Wandle Trail. This is a regional objective that this Local Plan appropriately compliments with, but which it

should be complementary with. A range of measures will be considered to achieve increased and safer use of this leisure asset. This includes making Morden Hall Park and Ravensbury Park more visible and accessible, and therefore feel safer. Wider entrances, improved cycle and pedestrian facilities and potential replacement of fences with railings are measures that can and should be considered, but that will need to be balanced with maintaining the character and tranquillity of the parks whilst also improving their use and safety.

The council agrees with the general aim to retain all existing mature trees where possible. It also supports planting new trees integral to new development. However, this appears not to be explicitly stated in the document. Policy EP R7 could be amended to make specific and clear reference to this.

EP R8: BUILDING HEIGHTS

Proposals regarding building heights have been developed based on a thorough analysis of the local context. This includes buildings of 2, 3 and 4 storeys, notably Ravensbury Court which is 4 storeys with pitched roofs. The council therefore does not feel it is inappropriate for some new buildings on the estate to be 4 storeys. However, the key message regarding building heights is that the taller buildings should be around the edge of the estate, with views through to the trees beyond through gaps between buildings and views over them. To ensure that the draft Local Plan maintains a strategic pitch throughout, requirements will be revised to set out key building height principles, rather than detailed prescriptive requirements. A balance must be achieved between respecting the landscape, the need to provide more homes, and ensuring any new development is viable. It is considered appropriate to amend the policy wording to refer to how taller and lower buildings should be located around the estate, with references to storey heights removed. The garages site should also be included.

2. PROPOSED CHANGES

Street networks are different from vehicle movement and should not be confused. Text and diagrams for policies EP R2 and EP R3 could be reviewed to clarify the difference and avoid confusion. Minor amendments to Policy EP R2 and addition to justification and map to clarify distinction between defined streets and vehicular movement. Addition to Policy EP R3 justification and map to highlight access and clarify distinction between defined streets and vehicular movement.

Include text at an appropriate place in the document encouraging to consult with the local community on a range of issues before submission of a planning application, including landscaping, plant and tree species. Addition to introduction in Part 04.

Parts a) and b) of Policy EP R6 make balanced statements regarding appropriate flood mitigation and SuDS, introducing swales as one of a range of possible measures. However, part d) and the accompanying map specifically propose swales as the key part of this strategy. This could appear as an inconsistency and the wording of the policy and the map could be amended accordingly to remove this inconsistency and ensure a clear policy message. Amendments made to text EP R6 to clarify that a range of flood mitigation measures should be used not solely swales. Map key amended to state flood mitigation measures rather than swales. Clarifications of in-river enhancements and additions to glossary.

The Local Plan Policy EP R4 is clear about the proposed land use. However, some of the supporting text could be seen as misleading or suggesting other uses. The likelihood of these uses forming part of any future development proposals is unclear and no assessment of demand has been undertaken. It is therefore considered appropriate to amend the wording of the supporting text to reflect the clarity of the policy wording. Map graphics changed to reflect other estates. Text amended to clarify proposed use.

The supporting text to Policy EP R6 Environmental Protection contains some inconsistencies and ambiguities and would benefit from amendments to address these in order to improve clarity and understanding for residents. Amendments made to text EP R6 to clarify that a range of flood mitigation measures should be used not solely swales. Map key amended to state flood mitigation measures rather than swales. Clarifications of in-river enhancements and additions to glossary.

Add the word 'undeveloped' to the glossary. Text added to glossary. Investigate with the Environment Agency the potential to provide river banks under the bridge at Ravensbury Mill to allow movement of flora and fauna. This will be taken up directly with the EA to establish its feasibility and action taken appropriately.

Amend policy EP R7 to make specific reference to the general aim to retain all existing mature trees. Text added to Policy EP R7 retain mature trees. Map and key amended to indicate location of established trees.

Ensure that it is clearly stated that no development will be permitted that increases flood risk, and that development should seek to reduce the risk of flooding. Addition to Policy EP R6 justification outlining process to ensure development which increases flood risk will not be permitted. Additions to glossary to explain sequential testing and flood risk assessment.

Amend the wording of policy EP R8 and alter the accompanying graphics on maps to refer to how taller and lower buildings should be located around the estate, with references to storey heights removed. Graphics on maps should be altered and

improved and encompass the garages part of the estate within the boundary on the plan. Additions to Policy EP R8. Map and key amended.

As pointed out in paragraph 3.277: “*The estate is essentially surrounded by high quality public open space in the form of Ravensbury Park and Morden Hall Park*”. All homes will have to be provided with sufficient private amenity space (London Plan Policy 3.5 and Sites & Policies Plan Policy DM D2) and the draft policy EP R5 requires the retention and enhancement of the existing communal garden spaces at Hengelo Gardens and Ravensbury Grove. Policy EP R5 should be amended to ensure the re-provision of the area of designated open space at the boundary with Ravensbury Park, in terms of quantity and quality, in a suitable location within the estate. There will therefore be no need for the provision of additional public open space in this site. Policy EP R5 b) states that the principal purpose of retaining open space on Hengelo Gardens and Ravensbury Grove is for flood mitigation measures. This is incorrect. They have trees and landscape worthy of retention and also lie outside the area suggested for regeneration. The following paragraphs 3.276 and 3.277 could appear contradictory regarding the provision of new public open space. Further guidance for EP R5 text amended and map amended.

Include a statement either as part of policy EP R3 or its justification that car parking will be provided according to relevant parking standards. New paragraph added to justification of Policy EP E3

Review wording in the most relevant place to clarify the relationship between the garages site and the main part of the estate. Amendment made to include the garages on building heights map EP R8.

Amend the map on p126 to correctly show the shops at the entrance to Deer Park Gardens as locally listed, rather than the houses as shown. Ravensbury historical context map amended.

Table 1: Summary of representations received from CHMP (now Clarion Housing Group) during consultation Stage 2

Policy	Comment received	Council Response / action
General	<p>Paragraph 2.4 of the draft DPD introduces the plan as a 'wholly design-led' document and is stated as being 'pitched at a high level, with detailed scheme proposals determined by the Council at the planning application stage should regeneration go ahead'. Having regard to this, the overall tone of the draft DPD is considered to be overly prescriptive particularly as this is a framework document. Flexibility should be introduced into the document and policies, in line with the suggestions below, to ensure that designs can offer viable sustainable solutions that provide the opportunity for genuine place-making.</p>	<p>DISAGREE. The plan is high-level in its approach, suitable for a DPD, with the policies setting out 'guiding principles' with further guidance. Most of the document contains either analysis or 'further guidance' or 'design guidance' that the applicant has significant license to develop in further detail.</p>
	<p>Section needs to be added to chapter 2 defining housing need as a key driver.</p>	<p>AGREE. NOTED. Text to be added to Chapter 2 identifying housing needs as a key driver, as they are multi-faceted. Possible text could read "Key Driver - Housing Need. There is an overwhelming need in London and in Merton supported by research, for additional housing of all types, tenures and size. The National Planning Policy Framework expects local authorities (para 47) to boost significantly the supply of housing. Merton's Core Strategy sets out a strategic housing target for 2011-2026 of 4,800 homes (320 homes p.a). This target has been revised as set out in the London Plan (consolidated with alterations since 2011) published in March 2015, to 4,107 homes (4111 homes p.a) for the period 2015-2025. This revision is in recognition by the Mayor of the pressing need for more homes in London. Regeneration, should it go ahead, accords with Strategic Objective 3 of Merton's Core Strategy and provides the opportunity to contribute to addressing the additional housing need as well as providing new high quality sustainable and environmentally efficient new homes.</p>
	<p>The proposed diagrams included within the DPD, for example, land use and heights diagrams are not considered to be necessary and are overly prescriptive. Should the local authority continue to include these diagrams it needs to be made clear that these are indicative diagrams and not in any way to be strictly</p>	<p>DISAGREE. It is appropriate for policies in planning documents to be accompanied by diagrams, particularly on the subjects covered, which are strategic. Their aim is to aid interpretation of the policy, and particularly as this is an urban design-led, spatial plan, this is a consistent approach for the planning authority. Where the plans are</p>

	<p>applied.</p> <p>Include reference to Intensification Area throughout the development where relevant. High Path is identified as being within the South Wimbledon / Colliers Wood Intensification Area as defined at Map 2.4 and Policy 2.13 of The London Plan (2015).</p>	<p>indicative this is clear on the key.</p> <p>NOTED. Although the London Plan Area for Intensification is a relevant planning steer, we believe that other ways of explaining the benefits of the estate's location - such as its excellent access to public transport – are more effective in explaining why High Path represents an appropriate location for intensified development. Merton is currently working with the neighbouring boroughs of Kingston, Sutton and Richmond on the establishment of a South London Opportunity Area. It is considered that the collective physical and strategic links of these boroughs provides an appropriate approach to identifying and establishing a future growth strategy for the borough. The Area for Intensification has been part of the London Plan since 2006 and its targets have already been met. Our experience of engaging with residents, businesses and others on planning and regeneration matters is that the term “Area of Intensification” does not help to convey the quality of urban design and opportunity that regeneration can bring to this area. Much like the term “high rise” the term “Area for Intensification” is seen as negative even though the factors that informed its original designation (excellent access to a variety of ways of travelling; good access to facilities and services, close to jobs and businesses etc.) are welcomed.</p>
	<p>The DPD should acknowledge throughout that the Estates are large enough to define their own setting, character and density.</p>	<p>DISAGREE. -All the estates, to an extent define their own character and it is not wholly inappropriate for them to do so. However, this issue itself could cause problems of integration with the surrounding context. This is particularly noticeable with High Path and Eastfields, where the urban form is either fragmented or alien to what it surrounds. It is an important design aim, reinforced in policy at various levels, that design should relate and respond positively to its context. It is the aim of the Local Plan to ensure that new development on the estates fits well with its surroundings and does not repeat past mistakes, some of which are the reasons why regeneration is considered necessary now. It is therefore not considered appropriate to over-emphasise or unduly encourage new proposals to significantly contrast with their</p>

		surroundings. They are not intended to be architectural or townscape 'set pieces' and must integrate well, and not be perceived as a barrier to movement or legibility through the wider urban area.
	Alter reference from 'Local Plan' to 'Estates Local Plan' throughout the whole document	AGREE. Make amendment.
	"Should regeneration go ahead this Estates Local Plan will be an essential part in provide a framework for shaping the redevelopment process..."	DISAGREE. The-Plan is clear and appropriate- Once adopted It will be an essential tool to shape and guide any development proposals for regeneration of the estates that may come forward. is The language used in paras. 2.3-2.4 is strategic in tone rather than prescriptive. The grammar however, could be improved by replacing 'part' with 'tool'.
	<p>This paragraph should be re-ordered in line with the NPPF priorities.</p> <ul style="list-style-type: none"> • To make Merton a well connected place where walking, cycling and public transport are the modes of choice when planning all journeys. • To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space. • 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. • To promote social cohesion and tackle deprivation by reducing inequalities. • To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space. • 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. • To make Merton an exemplary borough in mitigating and 	DISAGREE. The text at para. 2.9 is a reference to the Merton Core Strategy, not the NPPF. It is listed in exactly the same order as the Core Strategy. It is unclear how the suggested re-ordering of this list will have any effect on policy. It is also unclear to what priorities it is referring in the NPPF. The NPPF generally, does not prioritise its guidance. Merton's Core Strategy, adopted in 2011 and its strategic objectives are rightly listed here as the most relevant higher level policy context for the Estates Local Plan. Care has been taken in the document not to unnecessarily repeat a range of policy guidance for the sake of it - for example, policies in the London Plan are not listed in the document. The NPPF is appropriately referenced at para. 2.18.

<p>adapting to climate change and to make it a more attractive and green place.</p> <ul style="list-style-type: none"> • To make Merton a healthier and better place for people to live, work in or visit. 	
<p>2.10 A Sustainability Appraisal (SA) which incorporates a Strategic Environmental Assessment (SEA) has been undertaken in the preparation of the Draft Estates Local Plan and has assisted in the shaping of the document. The purpose of SA/SEA is to promote sustainable development by integrating economic, social, economic and environmental considerations into the preparation of the new Local Plan.</p> <p>2.11 The SA/SEA is also an important a tool for developing sound planning policies which are consistent with the government's sustainable development agenda and achieving the aspirations of local communities.</p>	<p>DISAGREE. The NPPF refers to these considerations on page 2, para. 7 and does not state that they are in any order of priority. Para. 8 also states they are mutually dependent. A Sustainability Appraisal is an important tool in assessing the soundness of a planning policy document and therefore appropriately referenced in this section of the document. The fact that it is part of a suite of tools does not make it unimportant.</p>
<p>Planning applications that accord with the policies in this Local Plan the Development Plan...</p>	<p>DISAGREE. Para 2.22 is making specific reference to the policies in the estates local plan. It is not necessary or appropriate to make reference to the wider development plan or planning acts at this point or in this context. Para 2.22 states this. This would also be contrary to the general aim of making the local plan readable to a wider audience rather than just planning professionals.</p>
<p>...to achieve the optimal balance of positive economic, social and environmental and economic outcomes...</p>	<p>DISAGREE. The NPPF does not prioritise these categories. Indeed, it says they are interdependent and can be mutually supportive. See Ref. 9 above.</p>
<p>This paragraph should be revisited as it is unclear whether reference should be made to the Sites and Policies DPD at this stage in the DPD.</p>	<p>AGREE. There are errors in this para. Wording should be altered to read: "In accordance with an EU Directive, councils are required to undertake Strategic Environmental Assessments of new plans. Government guidance allows both these and Sustainability Appraisals to be combined. an assessment of Merton's Draft Estates Local Plan has been conducted, which integrates a Sustainability Appraisal and a Strategic Environmental Assessment and is referred to by the single term 'Sustainability Appraisal'...."</p>
<p>A summary of the Case for Regeneration for each of the Estates</p>	<p>DISAGREE. The case for regeneration has its own section as it is a</p>

<p>should be included as a key driver.</p>	<p>key element of the plan. To include it within the key drivers would possibly make it seem less important.</p>
<p>CHMP have undertaken technical impact assessments, surveys and financial planning work...</p>	<p>NOTED. It would be appropriate to update this para. to make reference to specific documents produced by CHMP and which will form part of the evidence base for the Examination. A full list will be provided for the Inspector.</p>
<p>Add a sentence at the end of paragraph 2.28 as follows: Incremental refurbishment is a short term fix that will not be sufficient to meet longer term housing needs and results in comprehensive regeneration proposals being economically unviable for CHMP as the delivery partner.</p>	<p>DISAGREE. This is a statement about the planning and design benefits of regeneration over incremental development. <i>What the paragraph does not say is that there will be opportunity to provide more homes with a regeneration approach.</i> It is therefore suggested to amend the paragraph to read ...comparatively more significant changes, including more homes, to the three neighbourhoods...</p>
<p>Amended red line plan to be included (as per the enclosed) to ensure Nos. 68A and B [Nelson Grove Road?] are included, as well as all relevant portions of the footpath and public realm.</p>	<p>DISAGREE. These properties are outside the ownership of CHMP and not within the boundary of the estate. However, the amended plan submitted by the respondent does not actually include these properties. There are, however a couple of other minor discrepancies between the plans that need to be amended.</p>
<p>Amended red line plan to be included (as per the enclosed).</p>	<p>AGREE. The only discrepancy between the two plans is the inclusion of the footway along Morden Road on the draft plan map. This is highway land and not part of the estate and should be removed from within the red line boundary.</p>
<p>The creation of sustainable, well designed safe neighbourhoods with good quality new homes, that maintain and enhance the local community, improve living standards and create good environments through viable regeneration</p>	<p>DISAGREE. It is the aim of the plan to facilitate regeneration, so viability is implicit in this statement. It is not the only important consideration and if others were included in the vision statement it would become cumbersome.</p>
<p>The creation of a new vibrant neighbourhood with 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 quality, form and character, using land efficiently to make the most of good transport services and create a distinctly urban character based on "New London Vernacular" of traditional streets, front doors to streets, use of predominantly brick, homes</p>	<p>DISAGREE. The reference to New London Vernacular is a general guidance tool for the look and feel that the plan expects to see in this area that is consistent with its urban location. It is not, nor is it intended to be, prescriptive. The supporting text to the comment acknowledges that this style can accommodate a variety of forms. It is, as stated by the respondent, a style rather than a precise form of architecture. To this end the response contradicts itself. It is therefore considered entirely appropriate to use this reference as a general style guide, as</p>

<p>with good internal design and access to quality amenity space.</p>	<p>has been done with the other two estates. It is clear that at PTAL level 5, the area has good accessibility so removal of this reference is inappropriate. Other suggested changes would seem to be appropriate, however the statement needs to read well together with those for the other estates. It is considered that there may be scope for enhancing the text along these lines for all three estates.</p>
<p>New development must be designed to have buildings with entrances and windows facing the street... and ne should avoid blank walls or gable ends unless justified by detailed design analysis.</p>	<p>AGREE with insertion of 'should avoid'. DISAGREE with 'unless justified by detailed design analysis.' This suggested wording sets a tone that is encouraging applicants to find reasons for not adhering to guidance or suggesting that it is an onerous or expensive thing to do, rather than encouraging them to find good urban design solutions that are inherent in the design.</p>
<p>Irregular building lines and building heights undermine this and should therefore be avoided unless justified by detailed design analysis.</p>	<p>DISAGREE. As with Ref. 20 above this suggested wording sets a tone that is encouraging applicants to find reasons for not adhering to guidance or suggesting that it is an onerous or expensive thing to do, rather than encouraging them to find good urban design solutions that are inherent in the design.</p>
<p>All private, communal and public amenity space must be of a high quality of design, attractive, useable, fit for purpose and meet all policy requirements, including addressing issues of appropriate facilities, replacement space or identified shortfall unless justified by amenity and open space analysis.</p>	<p>DISAGREE. As with Ref. 20 above this suggested wording sets a tone that is encouraging applicants to find reasons for not adhering to guidance or suggesting that it is an onerous or expensive thing to do, rather than encouraging them to find good urban design solutions that are inherent in the design.</p>
<p>New development should be sustainable in terms of supporting local social and economic development to support community development, for example by making use of sustainable travel modes the first choice, encouraging community based car sharing schemes and facilitating improved health and well being such as enabling local food growing and are encouraged to implement aims set out by the Merton Food Charter.</p>	<p>AGREE. Add suggested text.</p>
<p>Development proposals should optimise the potential of the land and housing output. The London Plan density matrix should be applied in determining an appropriate density for each estate. Development that is too dense may result in cramped internal</p>	<p>DISAGREE. The design principles are in no order of priority or weighting, so their order is immaterial. Correct application of the London Plan density matrix, according to policy guidance, will ensure that it is not done mechanistically. The Plan is design-led, not density-</p>

	<p>layouts, overlooking or daylight issues, or a high number of single (or nearly single) aspect dwellings. Development that is not dense enough will not use land efficiently and effectively or provide sufficient good quality homes. Density should not be applied mechanistically and development proposals should have regard to other material considerations such as accessibility, design and local context.</p>	<p>led. Further reference to emphasise this point is unnecessary, repetitive and labours a point unnecessarily.</p>
	<p>The design, layout and appearance of new development should take inspiration and ideas from the positive elements of the local built, natural and historic context wherever relevant, unless justified by detailed design analysis. This must include an analysis of what local characteristics are relevant and why, and which are less so. The London Housing SPG notes that 'Typically, sites over two hectares usually have the potential to define their own setting.' The Estates are large enough to define their own setting, to deliver higher density development and to create their own characteristics. Opportunities to create their own character should be taken. Opportunity must be taken to strengthen local character by drawing on its positive characteristics,</p>	<p>DISAGREE. This section is specifically concerning the approach to be taken regarding local context, rather than estate size. It is not the appropriate place to add these references. These are covered adequately elsewhere in Merton's Local Plan. Adding such references at every opportunity will not create a balanced document, will make the paragraph confusing and Contradictory to read and will unduly diminish the weight to be given to a range of other policy guidance in the plan. The statement that the estates are large enough to define their own setting does not make sense. The estates are not sufficiently large that their surroundings should be ignored, and this setting or context must be a factor in any new designs and layouts. The estates do however, have scope to define a character of their own, however this must be tempered with the need for them to fit in appropriately with their surroundings and be a positive contribution of the wider urban form and townscape.</p>
<p>Eastfields</p>	<p>The estate itself is large enough and distinctive enough from its surroundings to form its own character.</p> <p>...Public Transport Accessibility Level (PTAL) score is low at only 2 which is defined as poor varies across the site ranging from 1b to 3 which defined as very poor to moderate by the London Plan.</p>	<p>DISAGREE. This misses the point here, which is acknowledging the current estate's distinctive style and its relative separateness from other development, rather than making a point about estate size. This can clearly be seen from the map. This is part of the analysis - not proposals - and it is not the size of the estate that is being discussed.</p> <p>AGREE. The TfL WebCat tool used for calculating PTAL shows that the score for the vast majority of the site - including that closest to Eastfields Station - is 2, with small pockets of 1b. Therefore the statement would appear to be correct as it stands. This is intended to be a statement of fact and is not intended to present the situation in any particular light. There is the possibility that the new street layouts</p>

		may raise the lower 1b PTAL level.
and include bin stores and parking in the centre.	AGREE. Make change.
	Suggested inclusion of housing optimisation as an opportunity	DISAGREE. - The issues and opportunities are design orientated, as with the majority of the plan. The policy requirements and desire for optimising housing numbers are dealt with elsewhere in the document. The respondent appears to be suggesting making reference to this issue in numerous places in the document which are inappropriate. This will lead to confusion and will not alter the importance of something already covered elsewhere in this and other policy documents.
	Creating an east-west link will could help to integrate the estate into the wider area. This could be achieved by creating a clearly visible east-west through street between Tamworth Lane and Woodstock Way by fully connecting up Acacia Road, Mulholland Close and Clay Avenue. The creation of a clearly visible north-south street from Grove Road, through the estate to the southern boundary will could also help to integrate the estate into wider area. This connectivity will enable the site to overcome its isolated feel by linking it to the area beyond.	DISAGREE. It is clear that there would be accessibility and other urban design benefits with creating an east-west link. This should not be confused with the extent to which it is feasible. A range of factors will need to be taken into account to establish whether it should go ahead. This will need to be assessed in any planning application. Links can be made visually and for pedestrians and cycles. The feasibility of a vehicular link should be explored at the planning application stage.
	The focal point for the area should be along the northern east-west route of the site. A series of focal points of varying nature could be developed along Acacia Road, for example at the intersection of the points of varying nature could be developed along Acacia Road, for example at the intersection of the north-south and east-west streets.	DISAGREE. This is an incorrect quotation, though the respondent does quote the text accurately prior to this. The correct quote is "The focal point could be at the intersection of the north-south and east-west streets." These are the primary axes suggested in the plan and the routes into the area. It therefore makes sense from an urban design perspective that this is the most appropriate location for a focal point. The use of 'could' does not preclude other focal points, but there are no obvious alternatives at the edges of the site or within it. The route to Eastfields Station will clearly be important, but the most relevant place on this route for a focal point would be at the junction with Tamworth Road, which is well outside the estate boundary. Other future opportunities around the school perimeter should not be prejudiced.
	Develop undesignated open spaces to allow for better distribution of functional open space throughout the estate. Retain existing	DISAGREE. As mentioned elsewhere, this plan includes the urban design analysis of the value of the trees. If they were not deemed of

<p>established mature trees in the central green space unless justified by an arboricultural survey and urban design analysis. Make this, or a similar replacement(s) publicly accessible and a basis for the creation of new open space and potential local focal points, squares, communal gardens, food growing etc.</p>	<p>value and worth retaining, they would not be referred to in text and on the maps.</p>
<p>Create visual connectivity to the generally attractive surroundings of the playground and cemetery and to make the BMX track less visually isolated. This could be achieved by retaining the mature trees surrounding the site, whilst thinning the smaller scrub and vegetation from between them, so opening out longer and wider views. Visual links to the south and east should focus primarily on long views across the green cemetery space. The galvanised cemetery boundary fence is unattractive. Buildings and landscape treatment should be used to minimise its barrier like impact on the public realm.</p>	<p>DISAGREE. There is no clear rationale put forward for the suggested change. However, implementing clear north-south and east-west links as the plan suggests, will clearly aid visual connectivity. These are general statements on opportunities in this section and the suggested changes are also quite detailed and could be seen as overly prescriptive, particularly in this part of the plan. the statement also seems to partly contradict comments elsewhere on scrub removal at Ref. 48. How this could be done is shown in the relevant policy section. For example, the townscape diagram could include arrows along the axes of the north-south and east-west streets.</p>
<p>Landmark buildings should be located around the focal points and gateways. focal point at the intersection of the north-south and east-west streets.</p>	<p>DISAGREE. See response to Ref. 31 above.</p>
<p>Landmark buildings could be differentiated by appearance and to a degree by height; however, they should be designed to ensure that they are sensitive to complementary to the general character of the rest of the development.</p>	<p>DISAGREE. The reasoning behind this comment is overly precise. The word 'sensitive' is not exclusively for use in relation to heritage assets. However, 'complementary' would seem a more logical word to use in the context.</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. Proposals should create focal points in the estate. The most suitable location for these are at key junctions and at gateways into the Estate.</p>	<p>DISAGREE. Locating other uses at focal points is complementary to the identification of a place as a focal point. It is not, in design terms, quite so appropriate to link alternative uses with gateways. In the case of Eastfields, this would be difficult to achieve on the estate due to the existing residential areas and open space. It is far more feasible to locate different uses at the focal point or at the wider area-level focal point of Eastfields station, which is outside the scope of the site.</p>
<p>The land use for the estate will remain predominantly residential with open space...</p>	<p>AGREE. There is some lack of clarity with the wording in this policy. It refers to re-provision of existing non-residential uses, however there are no such uses. It is suggested that the wording of this policy is reviewed. In this context it is considered appropriate to refer to the</p>

	proposed land use as being 'predominantly' residential.
Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate such as business space or local retail facilities, these could be located at the focal point where the north-south and east-west streets intersect. at the focal points and gateways.	AGREE. Make change as it allows for flexibility.
Eastfields is currently located within an area with a low to moderate Public Transport Accessibility Level and a suburban character. Taking account of these factors, and the existing number of homes, and application of the London Plan Matrix a range of 464 -644 (gross figure) new homes are anticipated on site. This density range should not be applied mechanistically and a design-led approach should be taken.	DISAGREE. Reference to moderate PTAL overstates degree of connectivity as only a small portion of the north-eastern corner of the site achieves this rating, although much of the site remains within 15 minutes' walk of Mitcham Eastfields Station. Inserting the words 'currently' and 'to moderate' allows flexibility for future changes such as 'metroisation' of service frequencies, though applications will be assessed on the PTAL at the time. The final suggested sentence is considered unnecessary as the London Plan clearly states the flexible way in which the matrix should be applied.
Diagram E4 suggested for deletion	DISAGREE. This is included for consistency with the rest of the format of the document. It also shows areas where non-residential uses may be considered, and this relates to other maps that accompany other policies. It is also important graphically when all policy area maps are shown together as a composite map.
a) 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. Any shortfall in quantity will only be acceptable where this is robustly justified.	DISAGREE. Unnecessary and inappropriate to state planning practice with regards to proposals seeking a departure from adopted policies (Site and Policies Plan Policy DM O1). There is adequate space within the site to provide sufficient open space. This is unlikely to affect viability. Emphasis should be on replacing the quantity of the existing designated space and improving the quality and usability of what currently exists. The suggested wording sets a tone that is encouraging applicants to find reasons for not providing sufficient space, rather than the retention and improvement of space, which is the aim of the policy.
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, unless their loss can be justified	DISAGREE. Unnecessary repetition of adopted Site and Policies Plan Policy DM O2 part d). This sets a tone that is encouraging applicants to find ways of justifying removal of trees, rather than trying to work

<p>by arboricultural or urban design analysis.</p>	<p>with the existing landscape and character. The wording as it stands does not preclude removal of some trees if this is deemed necessary. there should be a presumption against the removal of trees that have clear landscape value and public amenity.</p>
<p>d) All new houses should have gardens that meet or exceed current space standards.</p>	<p>DISAGREE. This is considered an acceptable inclusion in the policy, particularly as it refers to adhering to and exceeding adopted space standards. It is particularly important where development occurs in more suburban areas or where there are no specific site constraints. Removing this policy would send out the wrong message and suggests the respondent wished to build sub-standard accommodation. This policy guidance is missing from Policy EP H5 for High Path and should be included for consistency. If more appropriate, this reference should be put in the justification rather than the policy itself.</p>
<p>The streets meeting the southern boundary with the cemetery should preferably do so in could be in the form of pocket parks that can be utilised for a range of uses including allotments and food growing.</p>	<p>AGREE. It may be appropriate to change this statement, as the main aim is to secure public access to the boundary of the site and views across the cemetery, as well as promote green links across the site. Pocket parks and allotments are obvious ways of doing this, but other solutions may exist such as home-zones and play streets.</p>
<p>b) The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates....</p>	<p>DISAGREE. This policy makes specific reference to other adopted policy in the London Plan. The suggested wording departs from this and there would appear to be no justification for doing so. The wording is also suggesting to applicants to look for finding ways not to meet policy requirements rather than devoting energies to finding successful ways of implementing the policy.</p>
<p>Delete para 3.81 referring to culverted ditch.</p>	<p>DISAGREE. The ditch is clearly shown on Thames Water records as a culvert. Deculverting or creation of swales is an appropriate means of addressing flooding issues, As there are documented surface water flooding issues here, it would be entirely appropriate to provide a sustainable drainage feature whether it is in the form of deculverting or a separate feature. This has been done at Rowan Park. This is clearly explained in para. 3.81.</p>
<p>These trees should be retained- Existing trees of value should be retained unless justified by an arboricultural survey and urban</p>	<p>DISAGREE. Unnecessary repetition of adopted Site and Policies Plan Policy DM O2 part d). These trees preceded the construction of the</p>

<p>design analysis and be used to inform the design of landscape arrangements for example to provide cues for the location of focal points.</p>	<p>current estate. They have significant landscape, amenity and ecological value, identified by the site analysis in the local plan. There is no reason why they cannot be integrated into any future estate.</p>
<p>Reduce extent of scrub removal on the southern boundary to only locations adjacent to the pocket parks.</p>	<p>DISAGREE. It is part of the proposals to better integrate the estate with its surroundings, including the open space of the cemetery. Opening up views from rear gardens will help to achieve this. There is sufficient mature and semi-mature tree growth around the southern boundary to provide privacy to residents and soften the visual impact of new development when viewed from within the cemetery.</p>
<p>Insert before point a) the following: The Estate is large enough to create its own character with a variety of building heights which should be informed by a detailed character analysis, with consideration given to the below a) The majority of buildings across the estate should not extend higher than could range from 2 - 6 storeys to contribute to achieving consistency with the surrounding character.</p>	<p>DISAGREE. References to storey heights will be removed from the local plan. The statement about creating its own character and undertaking a character analysis would appear to be contradictory. The suggested storey height of 6 storeys appears to have no justification behind it. Refer to previous comments at Ref. 5. Any 'new' character proposed should in the first instance be informed and justified by the analysis of the local context, which has been done within the local plan.</p>
<p>... The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of the vegetation ... The exact storey heights should be informed by a detailed character and townscape visual impact analysis, including impact on local views.</p>	<p>DISAGREE. As the mature trees are a key component of the character of the site, the policy is in fact already doing what the suggested revision is suggesting. It should be noted that the local plan has already done this analysis and identified the trees as duly important.</p>
<p>The existing estate has a consistently uniform height of three storey buildings with flat roofs, that gives the estate its distinctive character; however the estate is large enough to create its own character with varied building heights. This existing layout presents something of a fortress feel from the outside, but a strong sense of calm enclosure from the inside This height and isolated location mean the estate is not a dominant form in the wider townscape.</p>	<p>DISAGREE. See previous comments at Ref. 5 on creation of own character of estates. This is an unnecessary proposed addition as the paragraph is simply describing the existing situation.</p>
<p>... A clear strategy on building heights will be needed to ensure the suburban character of the area is not unduly compromised.</p>	<p>DISAGREE. The character of the wider area is suburban by any method of assessment. However the text refers to the new development not altering the character of the wider area in an</p>

		inappropriate manner. This does not prevent new development from creating its own character and/or taking a different approach to storey heights to the rigid one currently in existence. Rowan, Brenly and Laburnum are examples of this.
High Path	Include reference to Intensification Area throughout the development where relevant. High Path is identified as being within the South Wimbledon / Colliers Wood Intensification Area as defined at Map 2.4 and Policy 2.13 of The London Plan (2015).	DISAGREE. This page, indicated by its title, describes the location of the estate, and not its policy status. See previous note at Ref. 4 above . Furthermore the targets for this designation have already been met.
	Public transport links are excellent with the area having a PTAL Level -rating of 5. Improvement works will result in a PTAL rating of 5-6a by 2021.	DISAGREE. Level, Rating or Value can be used as a descriptive term. The one most commonly in use by TfL appears to be Level. It is unclear what improvement works are referred to that will take the PTAL Level to 5-6a. Irrespective of this, the PTAL level at the time of the production of the plan is that most relevant. If this changes through the course of the plan delivery, it will need to be assessed at the relevant time along with all other relevant factors.
	Suggested revision - Para 3.120 - Commercial buildings along Merton High Street may seem a bit higher than 3 storeys due to their generous ceiling heights. There is a mixture of 3 and 4 storey buildings along Merton High Street. Some of the 3 storey buildings appear slightly higher than 3 storeys due to generous ceiling heights and extended parapets. This is probably the most appropriate location for taller buildings in the area	DISAGREE. Some buildings are two storeys and some have a fourth floor in the dormer roof. Therefore the passing reference to threes storeys is sufficiently accurate. It should also be noted that the text is not aiming to be overly prescriptive and the storey heights on the plan should be read as a whole to give an overall impression of the context in this regard.
	On the Key, replace 'Incidental green space' with 'Leftover spaces'.	DISAGREE. It is clear that the vast majority of this space was specifically planned as the setting for the buildings, particular with the earliest phase and the low-rise 1960s phase. Referring to it as 'leftover', would therefore be inaccurate. The plan is not intended as a discourse on the rights or wrongs of certain types of estate planning, but simply to give a visual impression of the disposition of land to different uses. The large amount of this space is part of the rationale for regeneration.
	1. Include housing optimisation as an opportunity. 2. Para. 3.139. ...Future links to the south of Merantun Way	DISAGREE. See response at Ref. 29 regarding including housing optimisation as an opportunity. Improving connectivity for pedestrians

	<p>should could be planned for as well as east-west quiet-ways for cyclists and pedestrians, subject to the findings of utilities and transport surveys.</p>	<p>and cyclist is essential for supporting sustainable travel choices. Opportunities will need to be explored through any TA including future proofing connections and promoted through a travel plan. This is implicit in any such proposals and such a specific reference here is probably unnecessary. The aim is to promote greater permeability in the wider area and has been supported at meetings with the GLA.</p>
	<p>Streets should be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove Road</p>	<p>DISAGREE. It is important for reasons of visual permeability and legibility of the urban environment that these two key routes have uninterrupted views along their entire lengths. This is important in ensuring the estate is seen as just another part of the urban environment through which people can pass as easily as through other parts, and that it feels as accessible and safe as anywhere else. It will help it connect well with its surroundings. The amendment, as suggested, also results in a somewhat bland and meaningless statement.</p>
	<p>...Other suitable locations could be the junction of High Path and Morden Road and the junction of Abbey Road and Merantun Way. Landmark buildings can also be delivered within the estate, where this can be justified in townscape and visual impact terms.</p>	<p>DISAGREE. Within the urban environment the estate should not be seen as a destination in its own right other than for those purposefully going there. It is not a district or local centre and to put landmarks or focal points in the estate could confuse legibility of the area. Within the estate there should certainly be license scope for marking out corners of buildings or other opportunities urban blocks in a different way architecturally. This however, should not compete with larger scale visual indicators that guide one into the estate. A reference could be made to the appropriateness of smaller scale features to aid orientation and legibility on a local neighbourhood scale.</p>
	<p>If the diagram is retained it should be updated as follows and taking account of the comments above: Move building line back along western edge of the High Street; the straight line view along entire east-west link is not possible if existing roads and utilities are to remain/be enhanced; and potential for landmark buildings within the site.</p>	<p>DISAGREE. See note at Ref. 58 above. Nelson Grove Road continues in a straight alignment from Abbey Road until its end, west of Hudson Court tower block. West of this is the first phase of the estate development, all of which will be demolished and replaced if regeneration is to go ahead. This will require upgrading of all roads and utilities on new alignments whatever layout is chosen. It cannot be said that this is not feasible as, on this basis, no other layout would be feasible either. The local plan is advocating a comprehensive</p>

		regeneration of the estate which would naturally expect to include reconfiguration and upgrading of all basic amenities to a new layout.
	Nelson Grove Road and Pincott Road, provide appropriate basis for the design of the new street network and should 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. towards Morden Road, will help provide a safe cycle and pedestrian link across the estate.	DISAGREE. See point at Refs. 58 & 60 above.
	North-south streets (not necessarily vehicular through routes) between Pincott Road and Abbey Road, linking Merton High Street and Nelson Grove Road. These new streets would help connect the new neighbourhood effectively with the existing grid pattern layout and also ensure efficient block pattern layout.	DISAGREE. It is important not to confuse the creation of streets with access and movement of different modes of transport. It is premature to add such a change as suggested. The section under Policy EP H3 Movement and Access deals with the issue of access for different modes of travel. The Council is open to consideration of any movement and access arrangement that maintains or improves the environment of nearby residents and estate residents. Therefore the applicant is advised to address this issue at an early stage with TfL and the Council for consideration.
	Consideration should be given to future proofing layouts to should be designed to allow for pedestrian access having regard to placemaking considerations...	DISAGREE. The existing text essentially says the same thing in different words, though the addition of the term futureproofing may be an improvement. The wording weakens the proposal to futureproof. [note that the tram is not funded and the route not yet fixed. If it terminated at south Wimbledon then this would most likely support increased access to the tube station]
	Whilst Rodney Place is outside the estate boundary, linking it into the street pattern of the estate should be explored as this could would help improve links within the area and make it easier to get around.	AGREE. Suggest the amendment is adopted.
	If the diagram is to be retained, it should reflect the comments made above and be amended as follows: horizontal orange line 'Nelson Grove Road (required historic street alignments)' should be amended and the blue arrow indicating potential access along Morden Road should be specified as a potential access and not	DISAGREE. See point at Refs. 58, 60 & 61 above. This is also not the diagram that indicates movement and access.

necessarily for vehicles.	
Off-street parking should preferably be provided instead of undercrofts at basement level, rather than ground level parking with communal garden podiums above. Where off-street parking is proposed detailed design consideration should be given to the impact on street frontages, landscaping and quality of residential accommodation.	- NOTED: This para. has been incorrectly quoted, but would benefit from changing to: "Where parking is provided off-street at ground level, with garden podiums above, care needs to be taken to ensure a positive active street frontage and good internal design to the residential units that wrap around the parking."
From the south the main access point at the junction of High Path and Merantun Way, where traffic movements are left and right into High Path, but restricted to left out only from High Path.	AGREE. Amendment seeks to clarify existing permissible movements
Although parking is restricted along High Path Road, localised congestion frequently occurs during school peak times. To improve cycle access it may prove necessary to further restrict vehicle movements by closing the western end of High Path to vehicle traffic, although careful consideration of the highway impacts, impacts on the school and alternative traffic routes will need to be fully understood. How any changes interact with outline plans for the South Wimbledon Tram extension will also need to be identified.	AGREE. Amendment seeks to clarify need to consider highway impacts beyond those related to the school
For off-street facilities the preference for parking to be provided in full undercrofts at basement level avoids the creation of residential units with windows only located on one side of the building (single aspect) at ground level that are difficult to design well internally and restrict the type of residential units that are possible.	DISAGREE. This para. outlines key benefits of well-designed on street parking and dis-benefits of single aspect housing.
if the diagram is to be retained, arrow along Nelson Grove Road showing vehicular route connecting to Morden Road should be removed.	DISAGREE. All lines have arrows at either end and to remove one would be confusing and inaccurate. This point has not been made for any other streets. The arrows are not intended to indicate access. It is the triangles at the junctions that do this.
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.	Point 1 - AGREE. Point 2 - AGREE. makes the sentence read clearer and more accurate.

<p>b) Development proposals must make more efficient use of the land by building in accordance with having regard to the London Plan density matrix which indicates that densities higher than existing are acceptable. Development proposals should improve are higher than current and improving the urban design quality of the estate.</p> <p>c) In general, the residential density should be higher in the north-west corner of the site, gradually reducing towards the south-east, where the public transport accessibility (PTAL) is lower and there are smaller scale developments (e.g. Rodney Place) or more local streets (e.g. High Path).</p>	<p>Point 3 - AGREE. The whole estate is considered to have a high accessibility and urban design considerations and assessment of local context will be more suitable in assessing proposals rather than a slavish adherence to PTAL levels.</p>
<p>High Path and the surrounding area are predominately residential. High Path is located within an urban area with a good level of Public Transport Accessibility (PTAL). In accordance with the London Plan density matrix, regeneration offers opportunities to make more efficient use of the land with higher density development. Applying this matrix indicates and taking account of the existing number of homes, indicates a range of 608 - 1,802 (gross figure) new homes for this site and the council's expectation is for development proposals to be at the higher end of this range. This density range should not be applied mechanistically and a design-led approach should be taken.</p>	<p>DISAGREE. The first sentence is about land use, not a description of character. The final suggested sentence is not appropriate as the guidance for how to apply the matrix is contained within the London Plan itself. The para. gives a general indication of how that policy will be applied without being too prescriptive and remaining suitably strategic for a local plan. See Ref. 39 for previous comments on application of the London Plan Density Matrix.</p>
<p>Subject to meeting the Local Plan policies, provision of such uses (e.g. retail shops, financial and professional services, cafes/restaurants, replacement of public houses, offices, community, health, leisure and entertainment uses)</p>	<p>AGREE. Suggest the amendment is adopted.</p>
<p>If the diagram is to be retained reference to retained trees informing the design of open spaces should be removed.</p>	<p>DISAGREE. No reason is given for this change. The statement is not intended to determine the location of open spaces. The policy is flexible on this. point is also covered appropriately by the following policy.</p>
<p>The retention of Retention of the existing mature tree groups of value and street trees of value including the trees fronting Merton</p>	<p>DISAGREE. The earlier analysis in the document has already established that the identified trees are of sufficient value to warrant</p>

<p>High Street east of the junction with Pincott Rd are to form the basis of new open spaces and a network of biodiversity enhancing green corridors across the estate unless justified by a detailed design analysis and arboricultural survey.</p>	<p>retention. Those not of value are not included on the diagram.</p>
<p>The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates....</p>	<p>DISAGREE. This policy makes specific reference to other adopted policy in the London Plan. The suggested wording departs from this and there would appear to be no justification for doing so. The wording is also suggesting to applicants to look for finding ways not to meet policy requirements rather than devoting energies to finding successful ways of implementing the policy. See also Ref. 45 above.</p>
<p>CHMP have undertaken physical surveys of the site which do not show the presence of this culverted ditch. CHMP request that if this reference is to be included the evidence base for the existence of the ditch should be provided.</p>	<p>DISAGREE. South of Merantun Way Bunces Ditch is an Environment Agency designated main river, with a southwards flow. This means that the water source is likely to come from the north side of Merantun Way. This is supported by evidence from historic maps. Recent investigations by the council have established there are 'issues' from under Merantun Way, but with no pipework and no clear source of the water flow. This evidence also supports the possibility that the water source may lie somewhere to the north of Merantun Way. The Environment Agency will therefore need to be consulted as part of any proposals for development to establish the situation. The wording of the para. should be updated to reflect the latest known information including the mew flood risk map.</p>
<p>If the diagram is to be retained remove reference to mature trees informing the design of open spaces</p>	<p>DISAGREE. See previous comments at Refs. 74 & 75.</p>
<p>a) Where justified by arboricultural surveys and urban design analysis, retention of: i) the existing mature tree groups (if of value) and street trees (if of value) including the trees fronting Merton High Street east and west of the junction with Pincott Road; ii) the trees (if of value) planting along Hayward Close should be continued along the whole length of the street to strengthen the attractive 'avenue' character of this street; iii) the mature tree(s) (if of value) in the vicinity of the playground</p>	<p>DISAGREE. See previous comments at Refs. 74 & 75. The basis for assessment of tree quality should be the existing tree survey undertaken by the council's arboricultural officer. Add the following sentence to para. 3.196: "The case for retention or felling of trees on the estate will be based on the tree survey undertaken by the Council's arboricultural officer."</p>

<p>within the 'Priory Close' block;</p> <p>iv) the line of mature trees (if of value) in the car park between the 'Ryder House' and Hudson Court' blocks;</p> <p>v) the mature trees (if of value) in the playground to the north of the 'Marsh Court' block.</p> <p>vi) the mature trees (if of value) to the west and south of the 'Merton Place' block, and to the north of the 'DeBurgh House' block.</p>	
<p>The estate is located in an area of intensification and is large enough to create its own character with varied building heights including potentially tall buildings having regard to the considerations below:</p> <p>a) The general building height across within the site should shall be informed by a detailed design analysis having regard to street character, legibility and views. be 5-6 storeys with variations (outlined below) in order to create a consistent height profile and street character that visually links with the surroundings.</p> <p>b) Buildings fronting Merton High Street should be 3 - 6 storeys having regard to the surrounding local character and will be restricted to 4 storeys (with potential for a 5th storey setback) to ensure the environmental quality of the street to ensure it does not unduly suffer from shading and blocking of sunlight. Set backs could be utilised to ensure an appropriate relationship with the surrounding area.</p> <p>c) Buildings fronting Morden Road should be 7-9 storeys to be similar to the existing and potential building heights on its west side and ensure a consistent and even street character.</p> <p>d) Buildings on the west side of Abbey Road should be up to 4 storeys to relate well to the existing housing on the east side and newer flats on the west side.</p> <p>e) Building heights along High Path should ensure no unacceptable harm to be 3-4 storeys in height to 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) Land outside the estate boundary fronting Merantun Way is suitable for buildings of 7-9 storeys to promote the transformation of this road into a boulevard street.@[Other matters]</p> <p>g) Where Station Road, Abbey Road and Merantun Way meet is a</p>	<p>DISAGREE. See previous comments on issue of creating own character at Ref. 5 above. The analysis referred to has already been undertaken and forms part of the local plan. It is entirely appropriate for the plan to highlight differing areas of character and any sensitivities and conflicts that may arise. This draws attention to the need for particular care in designing these areas.</p> <p>It should be noted that the policy guidance is clear on taller buildings. One of the design drivers for change is to create a coherent urban form. The current urban form is incoherent and fragmented for many reasons, one of these being a significant disparity in building heights and their locations. The guidance on heights is that it should take its cues from the surrounding area in terms of design. As noted below, it is recommended to removed references to storey heights, so the suggested changes would be unnecessary. High Path is a historic narrow route and this narrowness and the relative building heights and enclosure are relevant to this character, although there is clearly scope for change. It is not simply about the effect on the church. The suggested storey height of 3-7 storeys appears to have no justification behind it, whereas the proposed storey heights are based on the detailed analysis in the local plan - thus regard has been given to a detailed character and townscape analysis.</p> <p>It is also recommended that references to storey heights are removed and more reliance is placed on a more detailed description of the local</p>

	<p>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 and make the most of the potential for taller buildings fronting Merantun Way. Storey heights in this general area should rise from 3-4 storeys to 5-6 storeys. could be from 3 to 7 storeys having regard to detailed character and townscape analysis.</p>	<p>context. See also previous comments at Ref. 5. Any 'new' character proposed should in the first instance be informed and justified by an analysis of the local context. this has already been undertaken and forms part of the local plan, and is what will be used to develop guidance on building heights.</p>
	<p>Building heights along the lengths of streets should be similar or the same on either side in order to maintain a consistent character.</p>	<p>DISAGREE. This is entirely appropriate advice and included in established design guidance elsewhere. The proportion of street width to building heights has a fundamental impact on the quality of those streets and how well they work. Creating lop-sided streets gives an incoherent character and inconsistent urban form, and is part of the reason the existing urban fabric doesn't work. This sentence is not about architectural style or taste as asserted by the respondent, but about fundamental aspects of urban form, which are clearly strategic in nature and thus appropriate for this local plan.</p>
	<p>A more even appropriate distribution of heights will reduce these negative characteristics and help new development fit in comfortably with its surroundings. It will also create neighbourhood streets that are easy to get around. In order to fit well with the surroundings, it is important to ensure building heights on the edge of the estate relate appropriately to those adjacent to it.</p>	<p>DISAGREE. See notes at Ref. 81 above. The respondent gives no indication of what they mean by 'appropriate', nor does it explain what a 'design-led' approach to building heights is.. The sentence is informed by the urban design and townscape analysis that has already been done and forms part of the local plan.</p>
Ravensbury	<p>...area of approximately 4.5 hectares. It is therefore large enough to create its own character.</p>	<p>DISAGREE. This text is a description of the location of the estate and not an analysis. References to this issue are best referred to elsewhere in the local plan.</p>
	<p>Due to the structure of the section it is unclear about the historical development of the site. The narrative jumps from 1800s, to 1930s, 1970 and then 1950. It would help if some re-ordering of the paragraphs was undertaken.</p>	<p>NOTED Historical records are by their nature patchy and incomplete. . As is often the case the description is thematic, rather than strictly chronological to avoid unnecessary repetition.</p>
	<p>Maps from the 1950s show a branch of the River one of the man-made watercourses running alongside Morden Road which is clearly responsible for the set-back of the houses from the main road with earlier maps from the 1930s showing watercourses running east to west through the site.</p>	<p>DISAGREE. This water channel is clearly natural in its alignment in Morden Hall Park. It is more likely that it was altered when the new alignment of Morden Road was built and over time when the other clearly man-made narrow channels were constructed. It is also clear from the historic maps that the set-back of houses is due to the</p>

		existence of this watercourse as the 1950s map shows it in-situ with the houses constructed behind them.
Character Analysis Diagram. Ravensbury Estate (no. 1 in the key) has included both Ravensbury Mill and the buildings on the opposite side of Morden Road. These should be removed from the estate area and included in the Ravensbury Park and Morden Hall Park areas respectively.		DISAGREE. Whilst it is acknowledged that there is a clear historical relationship between these groups of buildings and their respective parklands, the visual links and relationships are with the estate, as this is how they are viewed along Morden Road. when inside the parks, these buildings are barely noticeable. When in the street, they, along with the Orlit houses, are a clear and distinct part of the character of the street.
...Within the Estate the PTAL is 1B. Improvements will result in a PTAL rating of 2-3 by 2021. ...		NOTED. According to the TfL WebCat site, the majority of the estate has a PTAL level of 2 rather than 1b as stated and this should be amended accordingly in the text. the local plan must base its policies on current PTAL levels rather than what they may or may not be in the future. If the PTAL level has changed when later phases of development are proposed, this can be taken into account at that time.
There are some Orlit houses along Ravensbury Grove which were built at the same time as the rest of the houses in Orange. There is photographic and mapped evidence that the two rows of original terraced houses on the estate were still standing when the Orlit houses were built and the plan should therefore be updated.		AGREE. Make appropriate amendment to diagram.
...At four storeys Ravensbury Court both reflects the scale of the mature trees and spaces surrounding it...		DISAGREE. This is a simple factual description and no reasoning is given for this proposed change.
Communal amenity space should be shown behind the block of flats at the bottom of Ravensbury Grove Road.		AGREE. This comment actually refers the diagram on p137. This is a clear omission. Make appropriate change.
...Most of the space is well defined and its use and purpose clear, with little however some of the space is being 'left over' or and ambiguous, for example, at the end of Ravensbury Grove. ...		AGREE. This is a clearer wording.
The landscape of the estate is defined influenced by the surrounding mature trees of Morden Hall Park and Ravensbury Park and the riparian landscape of the River Wandle. This gives the estate its secluded, almost rural feel and is an essential part of its character.		DISAGREE. The influence of the surrounding trees is considered strong enough to justify this statement as written. However, it would be better to simply describe the estate as secluded. Remove 'almost rural' and retain 'defined'.

<p>A footbridge across the river to an existing access onto Wandle Road would increase the accessibility of the area for residents of the estate and local area significantly.</p>	<p>DISAGREE. This subject has a clear link to the estate as it affects accessibility from the estate to its surroundings, including access to bus services. It also affects accessibility through the estate, affecting how easily people outside the estate can access tram and bus services to the north. This has clear benefits for natural surveillance and community safety. The estate cannot be seen in complete isolation from its immediate context. These benefits will be felt by residents of the estate.</p>
<p>Insert opportunity on housing optimisation and development density.</p>	<p>DISAGREE. See response at Ref. 29 regarding including housing optimisation as an opportunity.</p>
<p>Where possible, flood risk should be reduced without undermining the landscape character or semi-rural feel of the area.</p>	<p>AGREE. Complementary to change at comment 92 above.</p>
<p>Proposals should investigate working in conjunction with the National Trust to consider the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road. Proposals could investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.</p>	<p>DISAGREE. The influence of the local plan does legitimately extend beyond the immediate ownership boundary of the estates. The paragraph is simply identifying the scope of potential enhancements to the immediate context of the estate. However, it would be appropriate to make relevant references to CIL and other funding mechanisms in the Delivery and Implementation section.</p>
<p>The corner of the estate with Morden Road adjacent to Ravensbury Park will be expected to make an architectural statement which sensitively addresses take account of the park entrance, river and mill buildings.</p>	<p>DISAGREE. This is too weak a statement and there is no way of assessing whether something has 'taken account' of the location. The local plan is clear that it wants a high quality architectural response to respond to the high quality historic buildings on the opposite side of the road on a distinctive and highly visible corner. It is not being prescriptive about architectural style.</p>
<p>Ravensbury Grove, through landscaping, should be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.</p>	<p>DISAGREE. The point being made is that the street should be straight and visibly meet the edge of the estate and boundary with the park. This is for reasons of legibility. This point seems to have been understood in the pre-application designs recently submitted by the respondent for this area. This space could be a home-zone or other form of public realm.</p>
<p>Hengelo Gardens should be retained and enhanced, particularly</p>	<p>DISAGREE. This policy statement is based on an urban design</p>

<p>with respect to arrangement of car parking, general landscaping and the potential for flood attenuation measures unless justified through detailed urban design analysis.</p>	<p>analysis - the one that forms part of the local plan. Inserting the suggested text is unnecessary. As with Ref 20 above, this suggested wording sets a tone that is encouraging applicants to find reasons for not adhering to guidance or suggesting that it is an onerous or expensive thing to do, rather than encouraging them to find good urban design solutions that are inherent in the design.</p>
<p>There is scope to improve this crossing through enhancements to footways and crossing point which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment. The Council will investigate the potential of CIL funding being used for the delivery of any potential off-site enhancements.</p>	<p>DISAGREE. An appropriate reference to CIL and other funding mechanisms will be made in the Delivery and Implementation section.</p>
<p>Within Ravensbury Park there is potential to add additional bridges/walkways across the river and back channel which would allow for a better connection between the Ravensbury Estate and the play area in Ravensbury Park. The Council will investigate the potential of CIL funding being used for the delivery of any potential off-site enhancements.</p>	<p>NOTED. This paragraph is proposed to be deleted.</p>
<p>If the diagram is to be retained the northern connection to Morden Road should be removed.</p>	<p>DISAGREE. These are not actual proposed streets. They are indicative to show how an improved, more permeable street network could be provided. There are several ways this could be achieved. This is clear in the text and key.</p>
<p>Ravensbury is located within an area with a low level of Public Transport Accessibility. Taking account of these factors, and application of the London Plan matrix a range of 106 - 288 (gross figure which excludes land occupied by housing to be retained or refurbished) new homes are anticipated on this site. The council's expectation is for development proposals to be at the higher end of this range. This density range should not be applied mechanistically and a design led approach should be taken.</p>	<p>DISAGREE. The suggested sentence is not appropriate as the guidance for how to apply the matrix is contained within the London Plan itself. The para. gives a general indication of how that policy will be applied without being too prescriptive and remaining suitably strategic for a local plan. See previous comments at Refs. 39 & 72</p>
<p>This diagram is not considered relevant and should be removed.</p>	<p>DISAGREE. For consistency and clarity, this diagram needs to be retained.</p>

<p>All new houses and flats should have gardens and amenity space to meet or exceed current space standards</p>	<p>DISAGREE. This is considered an acceptable inclusion in the policy, particularly as it refers to adhering to adopted space standards. It is particularly important where development occurs in more suburban areas or where there are no specific site constraints. Removing this policy would send out the wrong message about the council's desire to ensure delivery of high quality housing. See comments at Ref. 43 above. .</p>
<p>The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates....</p>	<p>DISAGREE. This policy makes specific reference to other adopted policy in the London Plan. The suggested wording departs from this and there would appear to be no justification for doing so. The wording is also suggesting to applicants to look for finding ways not to meet policy requirements rather than devoting energies to finding successful ways of implementing the policy. See also Refs. 45 & 76 above.</p>
<p>Reinstatement of a Reference should be made in the landscape design to the historic river channel running along side Morden Road, for example through the provision of a dry swale....</p>	<p>DISAGREE. This is simply a statement about how this suggestion could have certain benefits. The suggestion is made, in part, to mitigate against flooding and would not be proposed if it did not do this. The Environment Agency is the appropriate body to assess its benefits. As this suggestion would have benefits for flooding and Morden Hall Park, the funding of such an improvement is also something that would need to be discussed at a later date.</p>
<p>Should the diagram be retained, the northern strip of 'Illustrative swale' is not an appropriate location for this due to depth of space between roads and houses and the location of existing trees. This could however be provided as permeable paving. The Key and plan should be updated to show this and to confirm that flood mitigation measures should not be limited to swales.</p>	<p>DISAGREE. It is acknowledged that the houses on the north side of the estate are slightly closer to Morden Road than those on the east side. However, as these buildings are proposed to be demolished, this point is somewhat immaterial, as new housing could be set back to accommodate a swale if considered appropriate. It should be noted that the diagram is illustrative, as clearly stated on the key.</p>
<p>a) The site is large enough to create its own character with varied heights. Building heights should be informed by a detailed character analysis not compete with complement established mature trees which envelope the estate and should not harm the visual amenities from within the adjacent parks. b) Within the development a building height range across the site of generally 2-4 storeys should not adversely affect views to the</p>	<p>DISAGREE. References to storey heights will be removed from the local plan. The statement about creating its own character and undertaking a character analysis would appear to be contradictory. The suggested storey height of 6 storeys appears to have no justification behind it. Refer to previous comments at Refs. 5, 49 & 80. Any 'new' character proposed should in the first instance be informed and justified by the analysis of the local context. The character</p>

	surrounding established trees. Taller buildings up to 5 storeys may be appropriate at focal points.	analysis has been done and forms part of the local plan.
	Housing typologies should New development comprising mainly of houses rather than flats is more likely to preserve the landscape character of the estate.	AGREE. This change is less prescriptive and acknowledges that a range of building types can contribute to preserving the landscape character of the estate. Recommend a slightly different wording: "Housing types, whether houses or flats, should preserve the landscape character of the estate."
	Remove diagram	DISAGREE. For consistency and clarity, this diagram needs to be retained.
	The next chapter outlines the requirements applicants will need to meet in their submission of planning applications. This entails a set of detailed design codes, developed by the applicant, in accordance with the Plan.	NOTED. It is noted that there is not consistent linking text between other chapters. A view will need to be taken on an appropriate consistent approach.
Design Codes	This part of the Plan requires the applicant to submit their own design codes for any development proposals. provides guidance on any design codes that may be required to support development proposals....	DISAGREE. Design codes are a strategic issue that are most appropriately established early on in the process and entirely legitimate to put in a strategic document like a local plan. It is also made clear in this section that the onus is on the applicant to develop the actual codes - what the local plan does is give guidance on the subject areas to be covered and the general direction of travel. Therefore, there is a reasonable amount of flexibility here. This is something the respondent themselves had asked for quite early on in the process of developing the local plan content. Other respondents have also pointed out that what is included in the design codes section is not really true design coding and would be better relabelled along the lines of detailed design guidance, or subject/issues based design guidance, which would likely be a requirement conditioned as part of any outline planning application. Such a change would be appropriate and is recommended.
	At the planning application stage, the Council will discuss with the applicant whether it is necessary to submit a design code. This will be dependent on the type of application and level of detail being submitted. will be expected to include as part of their application, a set of design codes that guides the development of	DISAGREE. See comments at Ref. 113 above.

	<p>each phase of the redevelopment. If required this could should include, but not necessarily be limited to, a number of specific subject areas outlined below. The following design principles lists the subject areas that must may need to be covered: and gives guidance on how these subjects could will be expected to be addressed. architecture and elevations, materials, landscape and biodiversity, flooding and drainage, internal space standards, building and dwelling layouts, building to street interface, street design characteristics, amenity space and refuse storage and collection.</p>	
	Delete Design Codes onwards - Paras 4.3 to 4.15	DISAGREE. See comments at Ref. 113 above.
Delivery and Implementation	Should regeneration of any of Merton's three estates go ahead, this currently...	AGREE. Make amendment.
	...CHMP have committed to an open book accounting process to facilitate the understanding of the impact on residents on council services.	DISAGREE. This statement is consistent with policies in the development plan.
	Building new homes for existing residents to move into directly and in a single move (i.e. without the need for a temporary decant) while their home is being built is very important for keeping existing communities together as far as is possible to create the foundations for a sustainable community long-term. It also minimises disruption to existing residents' lives.	DISAGREE. Even with the suggested changes this statement appears to contradict itself. This paragraph needs rewriting to be more clear and accurate.
	Amend subtitle to read as follows: Options for first phase of early housing delivery development on Eastfields	NOTED: It is possible there may need to be more clarity on this point. Review the subtitles.
	It may be possible to build new homes along the boundary of land within St Marks Academy, between Eastfields Estate and Eastfields train station, preserving the appropriate level of playing space while providing new homes that create better access between the station and the estate. This would allow the building of additional new homes which in turn could speed up the overall regeneration of Eastfields. At the same time a number of existing urban design and access issues could be improved with safer pedestrian routes to Mitcham Eastfields station and new street	AGREE. This explains some of the wider benefits better, however, a more appropriate change to the wording would be to amend the paragraph to read <i>"It may be possible to build new homes along the boundary of land within St. Mark's Academy, between Eastfields estate and Mitcham Eastfields train station, preserving the appropriate level of playing space. Whilst the delivery of the regeneration of the Eastfields Estate is not dependent on any development on the St. Mark's Academy site, its inclusion could speed up the delivery of Eastfields."</i>

	<p>frontages, while providing new homes that create better access between the station and the estate.</p> <p>Other potential sites were considered and are not recommended to be taken forward at this stage.</p> <p>The council will use section 106 planning obligations and/or CIL to ensure the delivery of key infrastructure and to mitigate impact of development. The Council will update the CIL Regulation 123 to include the items of infrastructure identified in this DPD.</p>	
Covering Letter	<p>It is noted 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.</p>	<p>AGREE. It would be inappropriate to assume the situation may not change regarding these sites in the future.</p> <p>NOTED. The existing statement suggests there would be no need for any change to regulations. However, if necessary this will be changed if appropriate, <i>although reference in the text here may not necessarily be necessary.</i></p>
	<p>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.</p>	<p>NOTED. -The SA/SEA will be reviewed to take account of these matters and further changes considered as appropriate.</p> <p>DISAGREE. It is considered that paras 2.16 - 2.20 comprehensively address this point.</p>
	<p>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.</p>	<p>DISAGREE. Detailed responses are made to specific points on this subject in the Comments Schedule provided by the respondent. Whilst the council agree that there is scope to develop a particular character for the estates, this needs to be balanced against the need to relate and integrate well into their surroundings. This is based on planning policy and good urban design principles. It is also based on the fact that being overly distinctive, as some of the current estates are, is part of the problems the estates face. It is not be advisable to simply repeat</p>
	<p>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.</p>	<p>NOTED Housing need and delivery will be appropriately referenced as key drivers in the document. See the note at Ref. 123 above.</p>

		this mistake, but just in another form. As far as character is concerned, the policy guidance in the local plan does not go much beyond this general requirement, so it cannot be said to be overly prescriptive in this sense.
	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.	NOTED. No details are provided in on which specific policies are in conflict. The building height policies have been developed based on a thorough analysis of the context, however it is recognised a balance needs to be struck between respecting landscape setting and townscape and the need to provide more homes and ensuring that any new development is viable. Specific reference to building height figures will therefore be removed from the building height policies and accompanying maps.
	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.	DISAGREE. The draft Plan is strategically pitched and appropriately detailed clearly setting out the council's parameters to guide any redevelopment proposals that may come forward for the three estates. These parameters conform to the Development Plan and all relevant material considerations.
	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.	AGREE. Reference will be made to this fact in an appropriate place in the document. However, it should be noted that the targets for this designation have already been met.
	There are inaccuracies and errors within the existing analysis which should be amended to ensure policies are based on correct and consistent analysis.	NOTED. If these have been raised in the Comments Schedule, then they have been addressed according to those specific points made. Otherwise, the council has not been made aware of anything else specific that it needs to address.
	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.	NOTED. All feedback will be considered by democratically elected councillors who will decide whether or not to move onto the next stage of the Local Plan.
	CHMP support that the Council has identified an opportunity for potential redevelopment at the St Marks Academy site. It is important that this opportunity is reflected within the DPD, with flexibility to allow the site to come forward, but that it does not delay the DPD adoption process.	NOTED. This is appropriately referred to in the Delivery & Implementation section of the local plan.

Table 2: Summary of representations received from Statutory Consultees during Stage 2 consultation.

Organisation	Estate	Comment	Council Response
Environment Agency	East Fields	<p>OPEN SPACE Open space reconfiguration and landscape connectivity opportunities should be tied in with requirements for: SuDs use; reduced rate of surface run-off; and storage and conveyance of surface water run-off. Planting of trees could take-up water and be part of overall sustainable drainage solution on the estate. Supportive of the creation of a linear park incorporating a swale or linear water feature facilitated by the de-culverting of the existing historic watercourse. The removal of a watercourse from a culvert can have flood risk management, ecological and biodiversity benefits. If the ditch cannot be de-culverted, the proposal for an offline sustainable drainage feature may be utilised and should be designed to benefit biodiversity.</p>	<p>The requirement for the provision of SuDS are stated in draft Policy EP E6 'Environmental protection' part a) but it does not advise that it should be tied in with the open space reconfiguration and landscape connectivity opportunities, neither does draft Policy EP E5 'Open space' nor draft Policy EP E7 Landscape. As the policy requirement has already been stated, it would be appropriate to insert some guidance in the 'Further guidance' part of draft Policy EP E5 'Open space'.</p>
		<p>ENVIRONMENTAL PROTECTION Welcomes EP6: that flood risk is considered in line with policy requirements, include all appropriate and applicable SuDs features and reduction of Greenfield run-off in line with the London Plan.</p>	
		<p>LANDSCAPING Open space reconfiguration and landscape connectivity opportunities should be tied in with requirements for: SuDs use; reduce rate of surface run-off; and storage and conveyance of surface water run-off. Planting of trees could take-up water and be part of overall sustainable drainage solution on the estate.</p>	
		<p>OTHER MATTERS Welcomed that Biodiversity is seen as a valuable asset in the borough, will not be adversely impacted by the regeneration proposals, and that opportunities for biodiversity enhancement will be sought.</p>	
	High Path	OPEN SPACE	Noted

		<p>It is noted and welcomed that there is specific reference to the use of open spaces to contribute towards the efficient system for the management of surface water runoff through the use of SuDS.</p>	
		<p>ENVIRONMENTAL PROTECTION</p> <p>Welcomes EP6: that flood risk is considered in line with policy requirements, include all appropriate and applicable SuDs features and reduction of Greenfield run-off in line with the London Plan.</p> <p>High Path is in close proximity to the River Wandle and therefore to areas which are considered to be at risk to fluvial flooding. The area is also considered to be at risk to surface water flooding and is shown as such on the latest version of the surface water flood risk mapping. With this in mind, any opportunity to better manage runoff and flows from this area which would reduce the risk to flooding elsewhere should be encouraged and implemented. Reference is made to the possible de-culverting of a section of the Bunces Ditch. This should be investigated in more detail as the removal of a watercourse from a culvert can not only have flood risk management benefits, but also a range of ecological and biodiversity benefits/value of the area.</p> <p>The potential for a heat recovery system from the River Wandle has also been referenced. Such systems can have implications on the biodiversity of rivers, particularly fish, due to such factors as changes in water temperature and structures in the watercourse. Therefore we would welcome early discussions with all relevant functions of the EA if this proposal should proceed.</p>	
		<p>OTHER MATTERS</p> <p>Flooding and biodiversity are identified as being particularly relevant to the redevelopment of this estate and we support the assertion that these factors are seen in a positive light by giving opportunities to improve flood risk, biodiversity and the landscape. We also support the fact that the proposed swales should not just be designed to attenuate run-off but will</p>	

		also benefit biodiversity.	
	Ravensbury	<p>OPEN SPACE</p> <p>We support the multi-benefits of SuDS, swales and other measures to create corridors for species to move and link with adjacent habitats and open space, including the river corridor. Proximity to Ravensbury Park might provide opportunities for flood reduction, with open areas being utilised for the storage of flood waters. We welcome the potential reinstatement of a historic river channel alongside Morden Road as long as this does not increase flood risk. Any reinstatement should be designed for maximum biodiversity benefit.</p>	NO COMMENT LISTED IN THE TABLE
		<p>ENVIRONMENTAL PROTECTION</p> <p>The Ravensbury Estate is located within an area considered at high risk to fluvial flooding from the adjacent River Wandle. A majority of the estate is shown within the 1 in 100 year (1%) flood risk area, with other parts located within the 1 in 1000 year (0.1%) flood risk area. Opportunities should be taken to reduce flood risk and increase resilience in the design of any regeneration proposal. The River Wandle is a designated main river and the prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works within 8 metres of the top of the bank. The proposal for a min 8 metres wide buffer zone along the River Wandle and 5m along ordinary watercourses is supported. We welcome the potential to enhance the backwater tributary channel of the River Wandle that runs along the southern boundary of the site and in-channel enhancements of the River Wandle.</p> <p>We would be happy to see and advise on such enhancements proposals to ensure biodiversity and geomorphology benefits are maximised without there being an increase in flood risk.</p>	
		<p>OTHER MATTERS</p> <p>Flooding and biodiversity are identified as being particularly relevant to the redevelopment of this estate and we support the assertion that these</p>	

	<p>factors are seen in a positive light by giving opportunities to improve flood risk, biodiversity and the landscape. We also support the fact that the proposed swales should not just be designed to attenuate run-off but will also benefit biodiversity.</p>	
All Estates	<p>SA / SEA : The list of plans set out within Appendix A does appear to cover all the relevant International/European, National, Regional and Local contexts in relation to flood risk.</p>	Noted
	<p>SA/ SEA : Appendix B - It should be noted that for Main Rivers, the Environment Agency has permissive powers that they can choose whether or not to exercise. The maintenance and upkeep of a watercourse is the responsibility of riparian owners. It should also be noted that the prior Consent from the Environment Agency is required for any works in, over or under the channel of a designated Main River, or within 8 metres of the top of the bank</p>	Noted. Additional notes to be added to Appendix B
	<p>SA/ SEA: Figure 4: Sustainability Appraisal Objectives section 8 : Biodiversity states the objective is to 'To enhance Merton's biodiversity'. We suggest this should be amended to: 'To protect and enhance Merton's biodiversity'.</p>	Noted
	<p>SA/SEA: Sustainability Appraisal Assessment: For each estate, biodiversity and green corridors are included, stating the links to flood alleviation and climate change, which we welcome. We recommend reference is made to Green Capital Green Infrastructure for a future city http://crossriverpartnership.org/media/2016/03/CRP-8779-Green-Brochure-AW-WEB1.pdf</p>	Noted
	<p>SA/SEA: Sustainability Appraisal Assessments <u>Eastfields:</u> We would like further information on how policies E3 Movement and access and E8 building heights have positive effects for biodiversity. We would also like further information on how policies E6 Environmental protection and E7 Landscape have been assessed has providing significant positive effects rather than minor positive effects for biodiversity.</p>	Noted

	<p>High Path: We would like further information on how policies HP 2 Street network and HP 3 Movement and access have positive effects for biodiversity.</p> <p>Ravensbury: Policy R3 Movement and access may have some biodiversity benefits, but we will be more of benefit for the movement of people rather than wildlife. We would like further detail on how policy R8 building heights will have positive effects for biodiversity.</p> <p>SA/SEA Appendix A: Fig. 2 National Context We recommend that the following national legislation is added 1. Countryside & Rights of Way (CRoW) Act, 2000. 2. Natural Environment & Rural Communities (NERC) Act, 2006. Fig. 4 Local Context. We recommend that you add Merton's Biodiversity Action Plan, unless this is considered out of date or withdrawn.</p> <p>SA/SEA Appendix B:Water quality and ecology 3.3 - welcome the inclusion of the Water Framework Directive (WFD) but this section needs to be updated. For instance, it refers only to the first cycle that ends in 2015. It should include cycle 2 (ending in 2021) and the new River Basin Management Plan that has very recently been published. 3.4 This mentions the two relevant WFD water bodies that flow through Merton and refers to Fig 3 that gives the ecological status of these water bodies. The most recent data given in Figure 3: Water body Classification is 2012. This should be updated to include the 2015 data. Also suggest including the chemical water quality status as well as the biological status for each of the two water bodies.</p> <p>SA/SEA Appendix B: Biodiversity, flora, and fauna 3.18 – 3.20 suggest listing the local wildlife sites that are within or close to the estates, such as 'Morden Hall Park and Dean City Farm' and 'The Upper River Wandle' adjacent to Ravensbury Estate.</p> <p>SA/SEA Appendix B: River biodiversity - welcome this section, however it only mentions fish and should include other species associated with the river and river corridor such as bats and stag beetle. There are also historic records for water voles and it could be included that there is a</p>	<p></p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
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		desire to reintroduce water voles to the Wandle.	
GLA	All Estates	<p>OTHER MATTERS</p> <p>The Mayor welcomes Merton's aim to master plan these potential large redevelopment sites through a development plan document (DPD) as recommended by London Plan policy 3.7. This approach will provide certainty to developers and the community, but the proposed policies need to be flexible enough to be implemented over the Plan period.</p>	Noted. Consideration of changes to be made where appropriate to improve the flexibility of the plan to be implemented over the Plan period, whilst ensuring it provides clear policy guidance to guide any regeneration proposals.
		<p>OTHER MATTERS</p> <p>The proposed policies on design, access, open space, and environmental quality are welcome. However, the document provides very limited commentary on the types, nature, and tenure of housing that the Council wants to be re-provided.</p>	Noted. Further supporting text to policies EP H4, HP H4 and RP H4 to be added to address this point.
		<p>BUILDING HEIGHTS</p> <p>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.</p>	<p>AMENDMENT PROPOSED: The Council has written its policies and guidance with paragraph 1.3.32 of the Mayor's Supplementary Planning Guidance 2016 in mind. It attempts to strike the right balance between achieving development that respects and relates well to its surroundings as a part of the continuous urban fabric, addresses issues of difference and severance that are in part driving regeneration, allows for appropriate expression of new development in terms of creating new character and makes an optimum and efficient use of land for new homes. <i>To this end, some amendments are proposed to the draft plan. Notably, this will include removal of reference to specific building heights and more of a reliance on assessment of character to interpret what</i></p>
		<p>LAND USE</p> <p>In addition, in line with London Plan policy 3.7, on the larger sites higher densities should be encouraged. For each estate, the document sets out a range for the potential number of new homes based on the density matrix in the London Plan. However, it is unclear what local characteristics the matrix setting was based on. The Council should take note of paragraph 1.3.32 of the Mayor's Supplementary Planning Guidance 2016 which advises that 'setting' should not be defined in a static way in relation to the character of the surrounding area without considering the potential for large sites to define their own characteristics in terms of setting and densities and for new development to be successfully integrated into its immediate context through considerate design. The Council should ensure these sites optimise their contribution to Merton's and London's</p>	

	<p>housing supply in order to meet local and strategic need. 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.</p>	<p><i>would be suitable in this respect.</i></p>
	<p>MOVEMENT AND ACCESS</p> <p>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. Car parking provision should accord with the London Plan maximum standards and cycle parking should accord with London Plan minimum standards.</p> <p>The plans recognise the need to improve the cycling and pedestrian networks throughout all three estates, and improving links to the surrounding areas to encourage walking and cycling. The Mayor and TfL would encourage regeneration proposals to conform to Policy 6.9 (Cycling) and 6.10 (Walking) of the London Plan.</p> <p>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.</p> <p>The Mayor and TfL would encourage the estate street networks to accord with TfL's Street Types guidance.</p>	<p>The TA and Management Plans will have regard for TfL best practice guidance, but will also be adapted to take into account locally important circumstances and movement concerns.</p> <p>Car parking provision should accord with the London Plan maximum standards and cycle parking should accord with London Plan minimum standards.</p> <p>The Council will work with Circle Homes to ensure vehicle and cycle parking respects London Plan standards.</p> <p>The Council will seek to ensure conformity with these policies and that a strong walking and cycling environment remains prominent within the plan</p> <p>TfL street type will be checked against the plan and re-evaluated where necessary to ensure conformity</p> <p>The council will consider additional requirements where a need is identified.</p> <p>The council will consider additional</p>

			requirements where a need is identified.
		<p>MOVEMENT AND ACCESS</p> <p>Given the scale, density and likely coordinated delivery of each site, the borough should consider whether there are any specific on-site requirements that could be generated from the potential development, for example, any physical or social infrastructure requirements and for High Path, a reduced car parking requirements, given its proximity to public transport</p>	<p>Development Plan policies address the provision of play space. The Council will use the GLA's child yield calculators to determine if and what level of additional school provision will be required in considering any submitted regeneration proposals. The Council have looked at the potential implications on social infrastructure of regeneration in consultation with statutory consultees e.g. NHS England which has not identified the need for additional infrastructural provision. Existing community facilities, such as the community room on Ravensbury Estate will be required to be reprovided as part of any regeneration proposals. Car parking provision should accord with the London Plan maximum standards and cycle parking should accord with London Plan minimum standards.</p>
National Grid	All Estates	Have reviewed the Draft Estates Local Plan consultation document and can confirm that there are s no comments to make in response to this consultation.	Noted
Sport England	All Estates	Suggested that the following sections of the Draft Plan namely: 03 Analysis and planning policies – Eastfields issues and opportunities – Opportunities summary – Reconfiguration of open space to create functional open spaces, paragraph 3.47, site Specific policies – Policy EP E4 Land Use and Policy EP E5 Open Space	The enclosed play area between Clay Avenue and the cemetery, which provides facilities for football and netball/basketball, could be described as a Multi-Use Games Area (MUGA) which measures approx. 550sqm. Sport England guidance and the NPPF seek to protect 'playing pitches' that

		<p>Should be revised to reflect Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' and that the aforementioned sections should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy.</p> <p>Recommend that Sport England's Active Design Guidance http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-andguidance/active-design/ is referenced within the Design Codes section</p>	<p>are at least 2000sqm.</p> <p>Draft Policy EP E5 'Open space' advises in paragraph 3.76 that: "Where the provision of a large public open space is justified, the design of the space should be flexible enough in terms of scale, layout and design so that it can play host to a variety of activities such as food growing, running tracks, playgrounds, sports courts, informal and flexible space which can support occasional use for a broad range of community events."</p> <p>The reference to the provision of open space in Policy EP E4 'Land use' and the guidance in draft Policy EP E5 'Open space' is sufficient to ensure the provision of sports facilities, if needed.</p>
Historic England	All Estates	<p>Historic England is pleased to note that listed buildings and archaeological priority areas have been indicated on the maps in the documents. In the interests of completeness, the illustration of all designated heritage assets on maps is encouraged. Historic England also advise that it would help if the registered parks, conservation areas and archaeological priority areas were hatched or shaded on maps rather than outlined to show what is included within areas.</p>	Noted
		<p>We note the reference in the High Path document to Merton Priory (The Augustinian Priory of St Mary at Merton), and would suggest that you state that it is a Scheduled Ancient Monument (equivalent to a Grade I listing).</p>	Noted
		<p>Design code requirements are generic and do not link back to the previous analysis of local context here is an opportunity here for the Council to provide detailed guidance about how it would like to see the area</p>	NOTED. A balance needs to be struck between giving design guidance and not being too prescriptive in doing so. There is

		<p>developed, and the buildings designed. We would therefore encourage you to take advantage of this opportunity, and spell out more clearly, possibly with illustrative examples, what your vision for these estates will look like.</p>	<p>perhaps a misunderstanding here, in that the subject matter of the codes is intended to be in addition to the analysis. It is based on general areas of good urban design that the council feels are most relevant to the estates. It is also intended to give the applicant the scope to develop their own designs within these areas of guidance. In this sense it is not intended to be prescriptive. It is possible this could be better explained as part of amendments planned for this section.</p>
TfL	All Estates	<p>OTHER MATTERS Consider specific on-site requirements generated by development uplift</p>	<p>This will be considered in the wider mix of proposals, development intensity and number of trips</p>
		<p>OTHER MATTERS Crossrail 2 should be consulted to ensure no adverse impacts on delivery of rail scheme. Likewise are there direct/indirect opportunities presented by Crossrail 2</p>	<p>The Council will ensure that Crossrail 2 are appraised of proposals</p>
		<p>OTHER MATTERS Tram remains unviable without significant local uplift along corridor</p>	<p>Noted. The Council understands the delivery barriers to building a compelling business case for the tram</p>
		<p>STREET NETWORK New vehicles access onto Merantun Way unlikely to be supported</p>	<p>Forming a strong street network is important and new vehicle accesses will only be pursued where there is sound justification</p>
		<p>MOVEMENT AND ACCESS Improved pedestrian and cycle permeability onto Merantun Way and possibly an additional formal crossing supported in principle although this would need to be funded through development</p>	<p>Building a strong and legible network of streets, including forming new connections onto Merantun Way is integral to achieving this aim and would be expected to be delivered as part of the development</p>
		<p>OTHER MATTERS Depending on trip generation mitigation towards additional bus capacity may be sought</p>	<p>The Transport Assessment will be used to assess the likely impact on existing Public Transport capacity and need for</p>

			contributions to enhance the network. This might include securing contributions through s106 agreement
		MOVEMENT AND ACCESS Facilitating potential tram network capacity and connectivity opportunities is considered very important	The Council will seek to ensure that accommodation is made for future tram capacity needs and proposals identified in strategic policy plans
		MOVEMENT AND ACCESS future tram would raise connectivity level and improve access to employment along Wandle Valley and Croydon town centre. Scheme would support local amenities and retail growth	The council recognises the potential to improve connectivity levels arising from the tram as well as opportunities to encourage/drive local growth
		STREET NETWORK There are significant opportunities to improve public realm and setting of Morden Road in conjunction with a future tram extension. TfL will work closely with the Council as route options along Morden Road are clarified	The Council will seek to exploit opportunities offered by the tram when formulating proposals for the public realm
		MOVEMENT AND ACCESS A new ticket gate at the underground station offers passenger benefits if closely associated with tram stop, although station would require substantial reconfiguration	The Council will seek to ensure that opportunities to form a new gate in the future are built in at the outset
		MOVEMENT AND ACCESS New tram terminus could be incorporated within the development with interim retail uses in the short term alternatively a public square could be created.	The Council will work with developers to encourage that opportunities to build in a new tram terminus in the future are built in at the outset
		MOVEMENT AND ACCESS TfL welcomes proposals to strengthen and improve the quality of pedestrian links to Belgrave Walk and Philips Bridge tram stops	The council notes TfL support. However, any proposals will need to be funded via new development
		MOVEMENT AND ACCESS Future tram enhancements and connections could facilitate higher densities of development, in particular impact on PTAL	The council notes TfL plans and aspirations for the tram. However these remain unfunded with no formal commitment to develop measures beyond feasibility stages.

2.11. Stage 3 – Pre Submission Estates Local Plan

More than 300 responses were submitted during the stage 2 consultation period. These were reviewed and used to improve the the Pre-Submission Estates Local Plan (stage 3).. The publication period for the stage 3 pre submission ELP was from 8th December 2016 to 3rd February 2017.. This was the final opportunity for consultees to provide comments prior to the council’s submission to the Secretary of State for examination by an independent planning inspector. .

2.12. Consultation methods: 8TH December 2016 – 3RD February 2017

Stage 3	
Consultation methods advised in Merton’s adopted SCI 2006	Consultation methods used
Press release: local / trade press	Wimbledon Guardian 8 th December 2017
Council website or associated / relevant websites.	Details of the consultation were placed on the Council’s public accessible under the Estates Plan consultation portal which is specific to the regeneration project. It explains what the consultation what about, how to submit comments with contact email address and telephone if there was any questions.
Direct mailing	The Council direct mailed the estate residents, stakeholders in the wider area and statutory consultees High Path Estate 3439 letters Eastfields Estate 1519 letters Ravensbury Estate 601 letters Stakeholders 35 (letters and emails). Councillors 60 (emails)
Dedicated phone and email	The Council publicised a dedicated Estate Plan telephone number - 0208 545 9639 for the public to call if they had any questions regarding the consultation (including translation and large print copies)

Merton Council's Estates Local Plan Publication stage took place between December 2016 and February 2017. The publication period covered 8 weeks to take into account the Christmas holiday period. Residents, relevant bodies and stakeholders were given the opportunity to comment on the Estates Local Plan that will help guide regeneration proposals for the estates of Eastfields, High Path and Ravensbury

The vast majority of responses received were qualitative thus would be impractical to analyse the responses quantitatively.

- Number of letters sent out
- Number of responses received
- Overall equal numbers of responses received regarding Eastfields were broadly positive and broadly negative. Within each of these respondents provided comments on how policies could be improved through being more specific or including certain phrases.

A number of neutral responses were received regarding High Path, for example asking to know more about the plans and the evidence base. Others, whilst negative about parts of the plan, were not specifically against regeneration in principle, but concerned about the specific design details in Clarion Housing Group's proposals. Overall there were relatively more responses against the regeneration than in favour of it. Several responses focussed on non-policy matters to do with maintenance and management issues, or concerns about schools.

Of the responses received regarding Ravensbury two were against regeneration and the other two raised concerns about the impact of specific policies within the Estates Local Plan but did not indicate whether they were for or against regeneration.

This document summarises the responses that were received from residents, statutory bodies and Clarion Housing Group. The publication documents and all responses received (minus personal details) can be found on Merton Council's website www.merton.gov.uk/estatesplan

2.13. Responses regarding all three estates

Responses received

Responses concerning all three estates were received from the following statutory bodies: The Metropolitan Police, Environment Agency, Sport England and the Greater London Authority. Additionally a response was received from Savills (Clarion Housing Group).

Townscape: how buildings and spaces should be arranged and their general character

- Concern that the design and utility constraints will impact on the ability to provide a straight street through the site.

Movement and access: how streets should work in terms of how people get around, by foot, cycle and vehicles

- Regeneration should incorporate Secure By Design principles and utilise a secure by design officer.
- For policy H3c it should be amended to take account of the fact that Morden Road is outside the site boundary, and to change the Public Transport Accessibility Level (PTAL) blanket figure to a range of figures of the Eastfields and Ravensbury sites.

Street network: the arrangement and layout of streets and what they should look and feel like

The comments received on street network were specific to each estate and are detailed in the relevant sections below.

Land use: suitable land uses for each neighbourhood

The comments received on land use were specific to each estate and are detailed in the relevant sections below.

Open space: the location and type of spaces that should be provided for each neighbourhood

- Open space policies should mention outdoor facilities.
- The Estates Local Plan makes it clear that the redevelopment will include the protection of open space.

- Policies E5d, H5c and R5d take too broad an approach that is too restrictive.
-

Environmental protection: how to maximise opportunities for biodiversity and prevent flooding

- Satisfied that their previous comments had been incorporated into this version of the plan.
- No requirement for the Exception test on Eastfields and Ravensbury and that this could be removed from policy E6 and R6.
- Unreasonable and unfeasible for air quality assessments to consider buildings that are outside of the control of the applicant and/or the site.
- H6 should provide evidence of a culverted watercourse.
- The Estates Local Plan includes an appropriate level of detail on landscape and environmental protection which are broadly in line with the London Plan.

Landscape: how each neighbourhood can use and building upon existing landscape assets to create high quality places

- Policies H7, E7 and R7 are in conflict with other policies in the plan and are restrictive.
- Policy R7 should be amended with respect to the widening and enhancing of the entrance to Ravensbury Park.
-

Building heights: appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area

The comments received on building heights were specific to each estate and are detailed in the relevant sections below.

Other policies

- Concerned about room sizes in the new properties.
- The London Borough of Merton does not have a robust playing fields and indoor facilities evidence base.
- There does not appear to be an indication of the quantum of new development or a range of new and re-provided homes for each of the three sites. The London Borough of Merton is encouraged to take account of the approach in the Affordable Housing and Viability Supplementary Planning Guidance and set threshold levels for viability for schemes without public subsidy.

2.14. Responses regarding Eastfields

Consultation responses received

Six responses were received regarding the Eastfields section of the Estates Local Plan.

Townscape: how buildings and spaces should be arranged and their general character

- Smaller spaces enclosed by back gardens engender community cohesion.

Movement and access: how streets should work in terms of how people get around, by foot, cycle and vehicles

- Consider the estate is currently permeable and legible

Street network: the arrangement and layout of streets and what they should look and feel like

- Agrees with road proposals but concerned it will be used as a shortcut.
- Concerned about congestion at the railway level crossing.
- Opportunity to improve the transport accessibility from in the Mitcham Eastfields area from 'poor' to 'good'.
- Request a clear guarantee that the construction of a road adjacent to the Acacia Centre would not put at risk the continued existence of the centre.
- Concerned that there will be serious accidents on Grove Road

Land use: suitable land uses for each neighbourhood

- Allocate 'reasonable' space to the business community (reference page 68).
- New homes will be closer together and darker inside.

Open space: the location and type of spaces that should be provided for each neighbourhood

- New homes will have less green space

Environmental protection: how to maximise opportunities for biodiversity and prevent flooding

No comments were received that specifically referred to this policy.

Landscape: how each neighbourhood can use and building upon existing landscape assets to create high quality places

No comments were received that specifically referred to this policy.

Building heights: appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area

- Concerned about the impact of proposed 4/5 storey buildings on Clay Avenue will have on properties in Hammond Avenue.
- Concerned about height of flats, thinks it should be 5 storeys maximum.
- Limit the views from Grove Road line of sight to two storeys (reference to pages 57 and 81).

Other policies

- GP provision at the estate should be considered (improved).
- Insufficient time to respond to the consultation.
- Mixed messages from London Borough of Merton and Clarion Housing Group.
- Estates Local Plan focuses on the negatives.
- Stress of the proposed regeneration has had a detrimental impact on health and wellbeing.
- The BMX track causes lots of issues.

Non Estates Plan representations

These are comments that do not relate to the Estates Local Plan that were raised during the consultation.

- Consider that the London Borough of Merton and Clarion Housing Group are determined to take their homes from them.
- Unaware of the resident offer.
- Wants to know when the regeneration will start.

2.15. Responses regarding High Path

Consultation responses received

20 responses were received regarding the High Path section of the Estates Local Plan.

Townscape: how buildings and spaces should be arranged and their general character

- Concerned that the Pre-Submission version of the plan does not reflect the latest plans from Clarion Housing Group.
- The variety and character of the buildings should be retained.
- Reference should be made to Dutch housing systems and innovative building materials.
- Considers that the design of the redeveloped estate should be in the style of Victorian terraced houses.
- The scheme set out in Clarion's masterplans is too dense, overdeveloped and out of scale with the context.
- Concerned that increased density will lead to increased congestion and pollution.
- Eleanor House should be gutted internally and reconfigured as duplex mansions.
- Pincott Road – important that it remains a viable business.
- Doel Close – should be brought back into use.
- Vanguard House – scope for a 4/3 storey building in white render.
- Abbey Road – do not want to move from existing area and present landscaping.
- De Burgh House – replacement no greater than 3 storeys on Nelson Grove
- Will Miles Court – no one wants to move.
- Hillborough Close – build mansard flats into roof space.
- Lovell House – build in same style 5 bed town house.
- Change garage space to multi-generational units.
- Hillborough Norfolk and Lovell rarely considered part of High Path Estate.
- Tower Blocks – provide concierge space, storage area for community uses and gardening materials.
- Hudson Court – 'if it ain't broke don't fix it'.
- Provide dimensions of flat and house types including areas of usable loft space, sheds and gardens.
- Abbey Road – better to acquire and demolish if a comprehensive build to this area is imperative.
- Kelmscott House – little justification for demolish and rebuild of Lovell or Norfolk House.
- Hubert Close – 3 storey block too high for the gardens and homes of Rodney Place.
- Problems with navigation and signage can be overcome with wholesale demolition of the site.
- Merit to repeating the style facing Merton high Street but the problem is access to the rear.
- The estate as existing is too large for a uniformity of external design.
- Need action to deal with drainage and uneven and unclean pavements.

- The scale and mass in brutalist shape (if not style) appears to be excessive for the area.
- Buildings need to be properly set back from the road.
- Materials should be in keeping with the existing local area.
- If the different phases have different character it will lead to mismatch not mitigate concern over monotony
- H1d highlighting areas links to Lord Nelson need to be carefully thought out.
- Agree that the estate should be designed to guide future development outside the estate.
- Difficult to appraise the Urban Design principles as the finer details will come later.
- Opportunity to refer to the curves of yesterday for the facades of the buildings rather than 'brutal preference'.
- PRP (architect appointed for High Path) intent on 'Goldfingersque' around the city.
- Size of dwellings is contentious.
- Consideration of the use of sustainable materials.
- Containing the estate and minimising traffic flow will give the estate a homely feel.

Movement and access: how streets should work in terms of how people get around, by foot, cycle and vehicles

- Consider that there is insufficient justification as to why the green chain to the Wandle Valley will pass across their front garden and why the cycle/pedestrian route will be directed across their back garden.
- High Path should be converted to a quiet way for bicycles and pedestrians only.
- Street furniture should not hinder path of pedestrians.
- H3 – will Harris Academy mean Merantun Way is redesigned into a boulevard?
- 3.117 – lack of cohesion on Morden Road due to London Borough of Merton.

Street network: the arrangement and layout of streets and what they should look and feel like

- Policy H2b should be amended to allow highways proposals to be developed at the application stage.
- The reference to car parking to be at London Plan maximum standards is welcomed.
- Reference should be made to cycle parking at London Plan minimum

standards.

- TFL would be unlikely to support additional vehicle access points on to Merantun way, so the language should be changed to say that it 'should be explored'.
- Estate street networks should comply with TFL's Street Types guidance.
- TFL will need to be consulted on any potential changes to the underground station at South Wimbledon.
- Roads should be thoroughfares not cul-de-sacs with appropriate street lighting.
- Consider that the conversion of Rodney Place into a 'mews' will encourage traffic into the road and in addition create security issues as people not associated with the estate will come into the area.
- Does not agree with Rodney Place being made a thoroughfare.
- Concerned that there won't be any place to park once the regeneration is completed.
- Concerned about increased road traffic.
- Consider that Abbey Road, a local rat run will be even more congested as a result of the regeneration.
- Consider that the tram stop should be in Colliers Wood not South Wimbledon.
- Morden Road is not that wide, tall buildings should not be too high or too close to the pavement.
- Links with Rodney Place should only be with existing resident approval.
- North/South extensions to Merantun Way will not be possible with proposed Harris Academy.
- These roads cannot be widened sufficiently.
- Containing the estate and minimising traffic flow will give the estate a homely feel.

Land use: suitable land uses for each neighbourhood

- Does not agree with the redevelopment/regeneration of the estate.
- A hospital, supermarket superstore and entertainment area (like the O2) should be part of the regeneration.
- Existing buildings on the estate need improvement but are structurally sound.
- Principle of regeneration is welcomed.
- Feel that a school should not be built in the area as it is highly polluted.

Open space: the location and type of spaces that should be provided for each neighbourhood

- Concerned that the amount of green space in the area will be reduced.

- Need garden squares similar to Belgravia.
- Supports green space fronting onto Merton High Street.

Environmental protection: how to maximise opportunities for biodiversity and prevent flooding

- Don't necessarily agree that new properties will be easier to heat.
- Disagrees with the locked in carbon calculation.
- Are the carbon emissions of the construction process taken into account in the calculations?
- Consideration of the use of sustainable materials.
- Commend the retaining of mature trees.
- Concerned about a Combined Heat and Power system (CHP) and contractual issues associated with it.

Landscape: how each neighbourhood can use and building upon existing landscape assets to create high quality places

- Resurface public roads and paths in the estates and leave the trees alone.

Building heights: appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area

- Concerned about the impact of the proposed development on Rodney Place (sunlight/daylight/privacy/building proximity)
- Sunlight – daylight impact on Rodney Place.
- Demolish the 3 towers and build family houses on the area behind the old lamp works.
- Consider that there will be no direct sunlight for Rodney Place Houses once the tower is built.
- 6 storeys on to Merton High Street is twice the height of the existing properties on the north side of the road. The proposed new properties will tower above the existing on the opposite side of the road.
- In winter the large areas of the Merton High Street will be in shadow cast by the 6 storey properties on the south side of the road.
- 6 storeys is not only out of character of the context it is out of character with the city.
- Vanguard House – scope for a 4/3 storey building in white render.
- Tower Blocks – provide concierge space, storage area for community uses and gardening materials.
- Increased density and tall buildings will totally spoil the character and feel of the area.
- 3.123 Morden Road is not that wide, tall buildings should not be too high or

- too close to the pavement.
- 3.132 Building should not been too high on Morden Road.
- H8 - Max building heights not specified in the document.
- H8c - Building heights on Morden Road should not be guided by the new developments that are coming forward.
- H8e - Buildings should not be taller than the mews streets within the estate.
- H8f - South side of Merantun Street will not benefit from tall buildings.

Other policies

- Space standards in homes should be maximised.
- The regeneration should include secure design.
- Existing schools are already strained and there is no provision for additional school places in the proposals.
- Feel that a school should not be built in the area as it is highly polluted.
- Disagree with the location of Harris Academy.
- Consider the proposed location of the secondary school to be inappropriate.
- Council seeks to break the implied contract with residents and unfairly deprive residents of amenity space, storage and living space.
- Multiplicity of problems and challenges which have not been properly acknowledged and therefore not properly resolved.
- Planting should be British native plants.
- Diversity is good and preferable to the proposed 'me-too' monoculture.
- Concerned that opportunities for resident engagement with the Clarion Housing Group has been reduced.
- The stress of the transfer to Clarion has caused the early death of at leave 4 people on the nearby estate.
- Need more options to be brought forward.
- Affordable housing needs to be the priority.
- Business rents should be set at affordable levels.
- There is a lack of alternative proposals with regard to externals.
- Consultations were meaningless.
- All materials used for public engagement should be forwarded to the inspector.
- Lack of respect to the adjoining character areas.
- Small area of the site should be transferred to a community land trust for innovative, affordable homes.
- No immediate pressure to replace it for structural purposes.
- No mention of internal layout.
- No reference to Harris Academy.
- 2.44 p37 – welcome active frontages but boundary should be defined by

railings or a wall

- Page 88 site analysis needs to take account of the proposed school.
- 3.119 bad design and high PTAL rating does not mean it can support large density increase.
- 3.128 - no point providing views to Merton Abbey Mills as it has been neglected.
- 3.128 – agree with providing views to the Wandle.
- 3.129 – agree that the estate should be designed to guide future development outside the estate.
- 4.4 – text missing.
- Commercial premises must reflect and retain the connection with the estate.
- Ownership of commercial venues should be pitched at independent proprietors employing local residents.
- Oppose Harris Academy location.
- Elderly/vulnerable people don't want to move.
- Concerned about the layout of the flats.
- Overall maintenance in the estate needs to be improved.
- Street lighting needs to be improved.
- Road sweeping needs to be more frequent.
- Nelson Gardens frequently visited by alcoholics.
- School pupils not given sufficient spaces in the 'strip of land' they have been allocated.
- Consider that the regeneration of High Path is unfair to freeholders.
- Consider that the proposed regeneration does not safeguard their financial and economic rights and wellbeing.
- Consider that the scheme is biased towards social tenants.
- Concerned the existing and replacement homes are not like for like, do not consider that, for example, loft spaces are being replaced.
- Consider that all the new houses are at least 0.5-1 metre narrower than in their current house.
- Consider that there will be no direct sunlight for Rodney place houses once the tower blocks/flats are built.
- Consider that the plan fails to include big on plot garages, stores and loft spaces.
- There are terraced Victorian properties on Pincott road but they are not referenced in the documentation.
- It is rather strange that the housing association and Merton Council has decided to exclude the proposed Harris Academy Secondary School development on High Path from all their documents.
- London Mayor's minimum housing standards, density and parking restrictions must not be used to lower our current and better standards of housing and parking facilities.

- Want to know the timeline for the project and how long the regeneration programme will last for and its impact on local residents.
- Request for information on the current population and the percentage increase for High Path.
- Request for information on how additional nursery/primary and secondary school provision will be met.
- Require assurance that public services will be able to cope with the increased population.
- What is the Clarion resident offer?
- Percentage of High Path residents in favour of the regeneration.
- Current split between social, private rented and private housing ownership.
- Require assurances that the new population will be satisfied with their built and social environment.
- Numerous Clarion repair and maintenance issues that have not been resolved.
- Repairs and service bad since the stock transfer.
- Engagement with residents not satisfactory.
- People in overcrowded dwellings need to be rehoused suitable.
- Clarion have not engaged with Merton NHS CCG appropriately.
- Clarion have removed staff that have provided adult social support.
- South Wimbledon Enhancement Plan set up by neighbourhood groups as the area does not have any localised character or a neighbourhood plan.

2.16. Responses regarding Ravensbury

Consultation responses received

Four responses were received regarding the Ravensbury section of the Estates Local Plan.

Townscape: how buildings and spaces should be arranged and their general character

- Principle of regeneration not welcome.
- Don't agree with the reversal of the Ravensbury Court flats.

Movement and access: how streets should work in terms of how people get around, by foot, cycle and vehicles

- Proposed alterations will increase the volume of vehicular traffic along Ravensbury Grove.
- Proposed alterations at the end of Ravensbury Grove will give the

impression that Ravensbury Grove is a connector road.

- Why has there been no suggestion to improve links with Morden in terms of crossing Morden Road?

Street network: the arrangement and layout of streets and what they should look and feel like

- Concerned that parking will become more difficult and lead to resident parking permits which are not wanted.
- Southern end of Ravensbury Grove forms designated open space and should not be lost.
- A new access onto Morden Road would ruin the secluded nature of the estate.
- Reduction of Morden Road severance on related to pedestrians.
- Want to ensure that the traffic barriers on Milner Road will continue to be in place.

Land use: suitable land uses for each neighbourhood

- Densities should be moderated as the area has outstanding character.

Open space: the location and type of spaces that should be provided for each neighbourhood

- Language in this section should be strengthened to preserve high quality views.
- The open space adjacent to Ravensbury Park will potentially be of lower quality than the existing open space.

Environmental protection: how to maximise opportunities for biodiversity and prevent flooding

- The proximity of the Ravensbury Estate to the Wandle and Ravensbury park mean that there are good opportunities to restore the river Wandle or undertake enhancements to improve the condition of the river.
- The legislation for permitting works on watercourses has changed since the last submission.
- Flood attenuation measures can be served without removal of this area which currently serves as shared space for incidental change.
- Morden Road access lane should be retained.
- Little said in regards to the creation and promotion of habitat within the estate.
- Maintenance of the banks of the Wandle need to be controlled via a Wildlife Statement.

- Ravensbury Mill has two channels already; the suggested small channel along Morden Road is not needed and would actively promote flooding.
- It would be advisable to agree where the top of the bank of the main river actually lies.
- Gravel should not be used in the swales.

Landscape: how each neighbourhood can use and building upon existing landscape assets to create high quality places

- Ravensbury area will be made worse by the overdevelopment of this uniquely sensitive area.

Building heights: appropriate height of buildings in different parts of the neighbourhood based on the analysis of the area

- Building heights in the vicinity of Ravensbury garages should take into account existing views to the tree-line from the existing buildings.
- Building heights, justification 3.3.10 reference to the existing buildings in vicinity of Ravensbury garages should be made in relation to the views to the tree line visible from around the estate.
- Taller buildings must be located around the edge of the estate is open to misinterpretation.
- Unfortunate that no mention of storey heights has been made in section EP R8
- Important not to compete with the 4 storey element of Ravensbury Court.

Other policies

- Photos of the estate give the impression that the estate needs regenerating but the more typical parts of the estate show that it does not.

2.17. Statutory responses

Metropolitan Police

- The inclusion of Secured by Design principles and standards within the regeneration of the estates will have a positive impact in relation to crime.
- The design and layout of the estates should provide well-defined routes with spaces and entrances promoting convenient movement without compromising security so improve access and movement.
- The designs should be structured so that different uses do not cause conflict.

- All publically accessible spaces should be overlooked to enhance surveillance.
- The development should promote a sense of ownership, respect, territorial responsibility and community.
- If necessary physical protection can be included with well-designed security features.
- Increased activity in appropriate locations can create a reduced risk of crime and increase a sense of safety.
- The designs should also have future management and maintenance in mind to discourage crime in the present and future.
- The design should follow NPPF guidelines and London Plan policies on designing out crime.
- By working with the local Met Police Designing Out Crime Officers accreditation could be achieved.
-

Environment Agency

- Satisfied that most of our comments from previous consultations have been incorporated into the Merton's Estates Local Plan pre-submission publication.
- The pre-submission publication appears to be founded on robust and credible evidence base.
- The findings of the Sustainability Appraisal have been reflected in the document and used to inform the policies.
- It is clear that flood risk is a consideration that has been taken into account.
- Welcome the preferred options for the redevelopment of the estates are seeking to ensure that flood risk elsewhere is not increased, ways to reduce flood risk are being sought and any opportunities to make space for water are being considered.
- The proximity of the Ravensbury Estate to the river Wandle and Ravensbury Park mean that there are good opportunities to restore the river Wandle through the park or undertake enhancements to improve the condition of the river as part of major redevelopment adjacent to it.
- Welcome paragraph 3.282 that recognises that redevelopment of the area provides an opportunity to improve the park and consider river restoration and enhancement to create a better functioning river and river corridor.
- The legislation for permitting works on watercourses has changed. Flood Defence Consents have been superseded by Flood Risk Activity Permits and now fall under the Environmental Permitting Regulations.
-

Sport England

- Policy EP E4, H4 and R4 should specifically mention indoor and outdoor sports facilities and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 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.
- Policy EP E5, H5 and R4 should specifically mention outdoor sports facilities and playing pitches and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement as noted above.
- Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development.
- Sport England is not aware of a robust evidence base for playing pitches and indoor sports facilities for Merton. It is not clear how this lack of evidence base has been/will be taken into account to develop this document.

Greater London Authority

- The Local Plan is supported in principle and conforms with the London Plan in aiming to bring forward the redevelopment of existing municipal housing and the delivery of new housing within the Merton Housing Zones.
- The Local Plan aims to provide significant additional housing through making efficient use of land, in line with policies in Chapter 3 of the London Plan.
- The inclusion of the protection of open space is welcomed and in line with the London Plan, and is an important element in providing a high quality environment for future residents.
- There does not appear to be an indication of the quantum of new development or even a range of new and re-provided homes for each of the three sites.
- Merton is encouraged to take account of its approach and set a threshold level for viability for schemes coming through the planning system without any public subsidy and have a clear approach to seeking to increase the amount of affordable housing delivered to 50% using grant and other public subsidy.
- The Plan includes an appropriate level of detail in relation to landscape and environmental protection, including flood risk and drainage, for the three housing estates where development will be focused.
- The Plan also contains a range of more detailed points and policies relating to the design and height of buildings within the new developments, these are largely a local matter, but are broadly in line with London Plan

design policies.

- TFL welcomes the reference to estate car parking being provided in accordance with London Plan maximum standards and would recommend that reference is also made to cycle parking conforming with London Plan minimum standards.
- TFL would encourage the estate street networks to accord with TFL's Street Types guidance.
- Recommend a change of phasing to state on p106 relating to High Path that "Future extensions of the north-south streets ending at High Path southwards towards to Merantun Way must *should be explored* (instead of must be a possibility), subject to TFL's support".
- TFL would be unlikely to support additional vehicle access points onto Merantun Way.
- Page 106 paragraph 3.139 – it is important to reiterate that TFL will not pay for the reconfiguration of the station but should there be other funding mechanisms for improvements, TFL would be willing to consider proposals.
- TFL welcomes reference to the tram extension to South Wimbledon and the requirement for developers to consult TFL on how to integrate the tram extension into development proposals on Morden Road.

Natural England

- It is clear that there is a desire to see the environment take a front and centre role (Policy ELP1) in the life of these estates in future both in terms of improvements on the ground now and also when accounting for climate change in years and decades to come.
- There is a big benefit to be seen from the proposed use of SuDS within the redevelopment on the three estates as this will help to improve water quality and quantity going into the River Wandle in the long term and also help reduce the surface water flood risks on the sites which are the primary area of concern from future changes to weather patterns from climate change.
- The Sustainability Appraisal (SA) has been used to help ensure that there are realistic choices made during the process which enable redevelopment to go ahead while still achieving gains for the environment which are key to combating climate change and improving the health and wellbeing of those living in London where air quality is an issue.
- The options chosen give a good account of the reasons why and allow for a wide scope of improvements to the biodiversity on site across the three sites, with links to green corridors possible as well as green or brown roof spaces a possible feature.

- Overall Natural England believes that provided the above elements are taken forward and there is a tangible improvement seen at the three estates as a result of redevelopment work then the environment will see benefits in the long term locally and more widely within London.
- The changes being suggested are not proposing huge modifications to the numbers of homes on the sites so it is unlikely that there would be a detrimental impact upon either Wimbledon Commons SAC or Richmond Park SAC however the Habitats Regulations Assessment process needs to be followed through to ensure that this is taken into account and mitigation is considered at the early stage to reduce risks in the first instance before impacts are possible.
- Broadly, we do not have any major concerns to highlight.

2.18. Response from Savills on behalf of Clarion Housing Group

- Latimer welcomes the Council's support for regeneration and intensification of the estates as set out in the Draft Local Plan and for the broad changes and alterations made since the Stage 2 Consultation.
- Latimer is at an advanced stage of preparation of the outline planning applications for the three estates and it is anticipated that these will be submitted prior to the examination hearings.
- Latimer has undertaken an extensive feasibility and discounting exercise in selecting these three Estates for regeneration.
- Latimer has considered a number of alternative options, such as meeting Decent Homes Standards only, as set out in the Case for Regeneration and after extensive assessment recognises that the full regeneration of High Path and Eastfields and the partial regeneration of Ravensbury presents the greatest opportunity to realise significant physical, social, economic and environmental benefits for not only the Estates but the wider borough.
- Latimer is supportive of the Council for bringing forward the DPD to aid the comprehensive regeneration of each of the Estates.
- Planning permission could be granted for each of the three schemes individually. It would be helpful if the DPD recognised that the schemes are not mutually dependable and that they could therefore be granted planning permission separately should this be required.
- There is a legislative context that should be included within the DPD. The draft ELP will form part of the development plan and as such it is important to make it clearer, that any planning application must have regard to the whole development plan, including The London Plan (2016), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, unless material

considerations indicate otherwise.

- The London Plan Policy 3.7 identifies that large sites (measuring 5ha or more) are able to create their own distinct character and support higher densities. This is further supported within the FLA Housing SPG paragraph 1.3.35 which refers to sites over 2ha being a large site and therefore able to create their own character and define their own setting. It is therefore considered appropriate for this to be recognised and referred to throughout the DPD with regards to Eastfields and High Path.
- The Estates Local Plan should replace the definitions of urban and suburban within the glossary to those that are set out within the London Plan to ensure conformity with the London Plan.
- We are broadly supportive of the changes the Council has made to rectify the conflicts between policies in the previous draft. The following areas have been identified for amendments:
 - Policies EP H7, EP E7, EP R7 contain restrictive landscape requirements which do not align with the requirements contained under other policies.
 - Reference to the Exception Test to be undertaken for High Path and Eastfields should be removed as there is no national policy requirement.
 - The PTAL ratings across High Path and Eastfields vary within the site and these more accurate PTAL ratings could be recognised in the draft Local Plan rather than the blanket figure currently set out for each estate.
 - There is discrepancy between the boundary line for High Path in the plan and the one provided in this response by Clarion.
- Welcome the increased flexibility in the draft ELP since the Stage 2 Consultation.
- The Estates Local Plan should not be applied mechanistically without regard to other Development Plan policies and this could be made clearer within the DPD wording.
- Given that the regeneration of the Estates will be delivered over a number of years it is considered entirely appropriate that flexibility should be built into the ELP to allow development proposals to respond to changing circumstances in order to create successful places.
- There are design and existing utilities constraints which will impact on the ability to provide a straight street through the site. Staggered streets create character and can reduce vehicular speeding. As such, this policy should allow for flexibility in how the central street is designed.
- Following the PPG guidance, providing a junction from Nelson Grove onto Morden Road may have traffic impact and movement issues, including being too close to the Merton High Street signalised junction. It would require all traffic to instead route through the masterplan site. As such, this

policy could be amended to allow highways proposals to be developed at application stage through consultation with the relevant highways authorities.

- It is suggested to amend Policy EP H3(c) to refer to “where possible” to take account of this being outside of the site boundary and proposals to be developed in conjunction with the relevant highways authorities.
- The open space policies take a blanket approach that is too restrictive and does not take into account the nature of various styles of properties. The policy could incorporate greater flexibility to reflect the various characteristics of different housing types and character areas.
- It is considered unreasonable and unfeasible for an air quality assessment to consider the potential benefits to existing buildings which are outside the control of the applicant and the application site.
- Policy EP E6 refers to the existing culverted watercourse, which is set out in our earlier representations, has not been identified by extensive technical surveys. As such reference to this should be removed or evidence provided by the Council to demonstrate the existence of the watercourse.
- Policies EP H7, E7 and R7 should note that “where possible” existing trees will be retained; however retention should be based on a robust arboriculture and urban design analysis.
- The section on Design Requirements could be more suitably titled “Design Guidance” to allow the masterplan proposals to respond accordingly.
- The reference to providing communal bin stores for refuse storage could be amended to allow other solutions to be considered, for example Underground Refuse Systems, which will be subject to agreement with the council’s waste team.
- The drawings provided within the draft ELP provide helpful imagery as to the potential opportunities of the estates, but these should not be regarded as rigid design requirements. A statement noting that the drawing are for indicative purposes only could be added.
- The level of detail to be submitted as part of a planning application should be commensurate to the type and nature of the application. Additionally, policy requirements should not be so onerous as to require details not normally required for planning application validation purposes. This is acknowledged in the latter parts of the draft Plan; however, it is not clear in some earlier policies.
- High Path is within the South Wimbledon/Colliers Wood Intensification Area and this should be acknowledged within the Estates Local Plan. It could also be recognised that London Plan identifies that higher densities can be supported in Intensification Areas.
- Latimer would like to confirm that they are committed to an open book accounting process with the council; however it would not be appropriate

for this to be made available in the public domain due to commercially sensitive information.

The responses received are set out in full in the spreadsheet below in policy order. As a result of these responses the council is recommending 35 minor modifications to the plan (SD3) which have been transposed into the Estates Local Plan submission document for clarity (SD4)

3. PART 3: RESPONSES FROM STATUTORY CONSULTEES AND RESIDENTS ASSOCIATIONS

3.1. STATUTORY STAKEHOLDERS

Environment Agency Responses

The responses received from the Environment Agency are appended. the comments to note are:-

Stage 2

- In favour of redevelopment

Stage 3

- Opening up a culverted watercourse at Eastfields and Path should be investigated.
- Consideration of sequential and exception tests at Ravensbury required.

Stage 2 SA/SEA

- Inclusion of the councils Biodiversity Action Plan
- Clarification of some policies positive impact on Biodiversity

GLA & TfL Responses - Stages 2 and 3

The responses received from the GLA are appended. The comments to note are:-

Stage 2

- ELP is in general conformity with the London Plan
- Housing delivery across the sites should be optimised
- Parking standard for vehicles and cycles to be in accordance with the London Plan

Stage 3

- ELP is in general conformity with the London Plan
- Consider that the quantum of development to be stated in the plan.

Met Police Responses - Stages 2 and 3

The responses received from the Met Police are appended. The comments to note are:-

Stage 2

- Not submitted

Stage 3

- Designing Out Crime Accreditation should be achieved for the site.
- Secure by Design principles should be included in the development

Natural England Responses - Stages 2 and 3

The responses received from Natural England are appended. The comments to note are:-

Stage 2

- No substantive comments made

Stage 3

- No substantive comments made

Savills (on behalf of Clarion Housing Group)

The responses received from Natural England are appended. The comments to note are:-

Stage 2

- Sites large enough to have their own individual character
- Policies considered to be too prescriptive

Stage 3

- Sites large enough to have their own individual character
- Policies considered to be too prescriptive

Sport England Responses

The responses received from Sport England are appended. The comments to note are:-

Stage 2

- Policies EP E4 and EP E5 to reflect NPPF and Sport England Playing Fields Policy
- Sport England recommended that their Active Design Guidance be incorporated into the ELP Design Code

Stage 3

- Objection raised to policy EPE4, EPH4 and EPR4 not referencing indoor play space
- Objection raised – policy EPE5, EPH5 and EPR5 not referencing outdoor play space
- Objection raised – evidence base considered to be incomplete

Stage 2 response from Sport England

Dear Sir/Madam

Merton's Draft Estates Local Plan consultation – Stage 2

Thank you for consulting Sport England on the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

In response to the consultation, Sport England would like to make the following comment on the consultation documents:

03 Analysis and planning policies – Eastfields issues and opportunities – Opportunities summary – Reconfiguration of open space to create functional open spaces, paragraph 3.47, site Specific policies – Policy EP E4 Land Use and Policy EP E5 Open Space

This section should therefore be revised to reflect Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives'

(http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf), which is in line with the NPPF. The statement details 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.

Furthermore, this section should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy (<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>).

04 Design codes

Sport England would recommend that Sport England's Active Design Guidance (<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>) is referenced within this section.

We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

Kind regards

Dale Greetham

Planning Manager

T: 0207 273 1642 **M:** 07787 582 803

F: 020 7273 1513 **E:** Dale.Greetham@sportengland.org

Stage 3 response from Sport England

Dear Sir/Madam

Thank you for consulting Sport England prior to the consultation on the preferred options version of the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

In response to the below email, Sport England would like to make the following comments:

Eastfields Policy EP E4 Land Use, High Path Policy EP H4 Land Use and Ravensbury EP R4 Land Use

Objection

These policies should specifically mention indoor and outdoor sports facilities and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', to ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

Eastfields Policy EP E5 Open Space, High Path Policy EP H5 Open Space and Ravensbury Policy EP R5 Open Space

Objection

These policies should specifically mention outdoor sports facilities and playing pitches and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', to ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

OBJECTION – Local Plan & Evidence Base

The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that:

“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”

Paragraph 175 of the NPPF states:

“Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan.”

Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development.

Sport England is not aware of a robust evidence base for playing pitches and indoor sports facilities for Merton. It is not clear how this lack of evidence base has been/will be taken into account to develop this document.

Sport England would be happy to provide further advice on how local authorities can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England’s website at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>. In addition

Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England’s website

at: <http://www.sportengland.org/facilities-planning/planning-for-sport/previous-guidance/>. The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs. Information regarding planning obligations for sport can be found on Sport England’s website at:

http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions.aspx.

We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

Kind regards

Dale Greetham

Planning Manager

T: 0207 273 1642

M: 07787 582 803

F: 020 7273 1513

E: Dale.Greetham@sportengland.org

3.2. RESIDENTS ASSOCIATIONS

Eastfields Residents Association

Representations were not received from the Eastfields residents association at the First Draft or Pre Submission stage.

High Path Community Association

The responses received from High Path Community Association are appended. Notable comments to note are:-

Stage 2

- Nothing submitted

Stage 3

- Regeneration is welcome
- Concerned that the council have not liaised with Merton NHS CCG

Ravensbury Residents Association

There are an extensive number of diagrams included in the representations which need to be read in conjunction with the commentary. The responses are listed in full for stage1 and 2 (SD16) and stage 3 (SD7)

The responses received from Ravensbury Residents Association are set out below. The comments to note are:-

Stage 2

- Refurbishment considered to be the best option for the site
- Concerns raised about the whole plan, including setting and building heights.

Stage 3

- Concerned that the issues raised at stage two have not been fully address at Stage 3.

3.3. List of Consultees

(contacted during stages 1, 2 & 3)

London Borough of Wandsworth
London Borough of Sutton
Royal Borough of Richmond

Royal Borough of Kingston-upon-Thames
London Borough of Croydon

Other statutory bodies:

British Gas Plc
CPRE London
Department for Culture, Media and Sport (DCMS)
Department for Business Innovation and Skills
Department for Energy and Climate Change
Department Environment Food Rural Affairs
Department for Work and Pensions (DWP)
Director of Merton Public Health
EDF Energy Properties
Environment Agency
Historic England (formally English Heritage)
Highways England (formally Highways Agency)
London Ambulance Service
London Borough of Croydon
London Borough of Wandsworth
London Borough of Sutton
London Borough of Kingston

London Energy
London Fire and Emergency Planning Authority
Local Government Association (LGA)
Mayor of London and offices held by the Mayor; and Greater London Authority (GLA)
Merton Priory Homes
Metropolitan Police Service (MPS)
Mobile Operators Association (MOA) c/o
Mono Consulting Ltd
Natural England
Network Rail
National Grid
Natural England
NHS London Healthy Urban Development Unit
Powergen Plc
Royal Borough of Richmond
Royal Borough of Kingston upon Thames
NHS England (London)
Transport for London (TfL)
Thames Water Utilities

Merton council team

Children, Schools and Family
Education department

Housing department
Traffic and Highways
Lead Local Flood Authority (LLFA)

Residents associations, groups, organisations and civic organisations

Abbey MAG (Multi-Agency Group)

Amity Grove Residents Association
Apostles Residents' Association
Arthur Road Association
Colliers Wood Community Association
Colliers Wood Residents' Association
Cottenham Park Allotments
Community of Woodside Area Residents'
Association (CWARA)
Drax Avenue Road Committee
Garth Residents' Association
Graham, Hartfield and Herbert Roads RA
(GHHRA)
Grange Residents Association
Harland Estate Residents Association
(HERA)
Hillcross Community Action
Homefield Road Residents Association
Lambton Road CA
Lavender MAG (Multi-Agency Group)
Lower Edge Hill and Darlaston Road
Residents Association
Merton Park Ward Residents Association
Merton Allotments and Gardens
Association
Mitcham Society
Mitcham Working Group
North West Wimbledon Residents
Association
Phipps Bridge and New Close Residents

Group
Phipps Bridge MAG (Multi-Agency Group)
Princes, Dudley and Kings Road
Association
Ravensbury Lanes and Avenues
Residents Association
Raynes Park Association
Raynes Park and West BARNES
Residents Association
South Mitcham Community Association
South Park Estate Residents' Association
(SPERA)
South Ridgway Residents Association
The Raynes Park Association
The Wimbledon Society
Treasurer Belvedere Estate Residents
Association Village Residents Association
(Mitcham)
West Wimbledon Residents' Association
Willow Lane Action Group
Wimbledon Park Residents Association
Wimbledon East Hillside RA
Wimbledon Union of Res Ass (WURA)
Wimbledon Common West Residents
Association
Wilmore End Residents Association
Wimbledon Civic Forum
Wimbledon E Hillside Residents'
Association (WEHRA)

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

Alphabetical order by representor

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

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

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

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

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099000EA	Environment Agency	High Path	<p>High Path</p> <p>This area is mainly situated within Flood Zone 1, though a part of the site is located within Flood Zone 2. The opportunity to increase the density of housing within a low fluvial flood risk area has been highlighted in the Plan. The recognition of needing to ensure surface water runoff is suitability managed to allow for the runoff rates that are compliant with guidance and policy is noted, as are the references to the inclusion of SUDS.</p> <p>The Bunces Ditch, a designated main river, runs along the edge of or just within the boundary of the overall site. We note that comment is made regarding further investigations into the origin and route of this watercourse, as the exact line of a culverted watercourse can be difficult to determine from the surface. If there was an opportunity to open up a culverted watercourse it should be looked into further, as this can help to manage flood risk as well as having a number of biodiversity benefits. If development could be moved away from the watercourse that would also be of benefit in terms of access for maintenance purposes.</p>	Environment	Environmental Protection H6	Noted. Opportunities for culvert enhancements at Bunces Ditch will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.
100000EA	Environment Agency	Ravensbury	<p>Ravensbury</p> <p>The Ravensbury Estate is shown as being located within an area considered to be a high risk to fluvial flooding from the adjacent River Wandle. However the plan recognises that this needs to be effectively managed as part of the redevelopment of the estate. Ravensbury Estate is already developed for residential use and new development would offer the opportunity and potential for mitigation measures to be incorporated into the redevelopment. This would include the raising of the finished floor levels of dwellings to a minimum of 300mm above the 1 in 100 year flood level, taking into account climate change.</p> <p>There would also be the opportunity for flood resistant and resilience in the redevelopment, which is also welcomed. Reference is also made to a SUDS strategy as part of the redevelopment. However, due to the varying levels of flood risk across the Estate, there is a need to carefully consider the sequential and exception tests, as well as the requirement for a site specific flood risk assessments. Adequate provision and consideration needs to be given to the category of development proposed for each area on the Estate and its compliance with the NPPF and the Boroughs own Policy on flooding. The introduction of a greater number of residential dwellings in an area at risk to flooding should be carefully assessed to determine whether it can be considered as appropriate in that location. In addition, any redevelopment proposal should be able to clearly demonstrate that there will be no loss of floodplain storage capacity and ideally, further storage for flood waters should be created.</p> <p>It should also be noted that updated climate change guidance was released earlier this year, and therefore the most up to date information should be taken into account as part of any redevelopment plans. Any development should also take every opportunity to increase both the flood resistance and resilience to buildings and the surrounding environment.</p>	Environment	Environmental Protection R6	Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.
101000EA	Environment Agency	All three	We note that reference is made to the National Planning Policy Framework (NPPF) in relation to flood risk, and that it will be necessary to comply with the Sequential and Exception Tests as appropriate, and also the necessity of producing site specific Flood Risk Assessments to accompany detailed plans for the redevelopment of these areas.	Environment	Environmental Protection E6 H6 R6	Noted. Opportunities for river corridor enhancements will be considered as part of the planning application process in accordance with the London Plan Policy 7.24 Blue Ribbon Network and policy 7.19 Biodiversity and access to nature. The Sequential and Exception test will be undertaken for all sources of flooding in accordance with the NPPF.
017002EP	Falzon C	Eastfields	Regarding Mitcham Eastfields estates plan. In my view I think the estate should stay the same but make improvements to whats already there, to make better, the front, rear and internal of the properties. this will save a lot of money, better then knocking down peoples homes. That is my view.	General	Townscape E1	Noted.
21200GLA	GLA	All Three	<p>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012 Re: Merton Estates Local Plan Pre-Submission</p> <p>Thank you for consulting the Mayor of London on the Merton Estates local Plan Pre-Submission regarding its general conformity with the London Plan under section 24 (1) (b) of the Planning and compulsory Purchase Act 2004. This letter covers matters from the GLA and TfL.</p>	General	N/A	No comment required
21300GLA	GLA	All Three	General. The Local Plan is supported in principle and confirms with the London Plan in aiming to bring forward the redevelopment of existing municipal housing and the delivery of new housing within the Merton Housing Zones. In particular the Local Plan aims to provide significant additional housing through making efficient use of land in line with policies in Chapter 3 of the London Plan.	General	N/A	Noted. The Estates Local Plan will form part of the development plan once adopted, and any planning application must have regard to the whole development plan, including the London Plan (2016), the Merton Core Strategy (2011) and Sites and Policies Plan (2014), in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. The Estates Local Plan covers a significant regeneration and investment period of 15 years. It sets out a strategically pitched framework to guide regeneration over the 15 years, with the level of prescription, such as the quantum of housing to be determined at the planning application stage in accordance with relevant planning considerations and requirements set out by the whole development plan.
21400GLA	GLA	All Three	The Local Plan makes clear that the redevelopment will include the protection of open space. This is welcomed and in line with London Plan 7:18, and is an important element in providing a high quality environment for future residents.	Environment	Open Space E5 H5 R5	Noted with thanks
21500GLA	GLA	All Three	However, there does not appear to be an indication of the quantum of new development or even a range of new and re-provided homes for each of the three sites. Such a figure or range will be important to help set the context for most readers. The GLA and TfL are aware of the broad quantum envisaged through our involvement with Housing Zones designations but this will not be the case for many others.	General	N/A	The Estates Local Plan covers a significant regeneration and investment period of 15 years. It sets out a strategically pitched framework to guide regeneration over the 15 years, with the level of prescription, such as the quantum of housing to be determined at the planning application stage in accordance with relevant planning considerations and requirements set out by the whole development plan. The Estates Plan Housing Market Assessment (examination library reference SD12) accompanying the Plan sets out potential ranges of the number of homes that could be provided within each estate.

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

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

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

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

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

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

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

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

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

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

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

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

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120003EP	Reeves C	Eastfields	<p>Site specific policies</p> <p>Justification</p> <p>3.61 'Eastfields is located in an area with a low Public Transport Accessibility Level...'</p> <p>We have a mainline railway station, within 10 minutes walk, with easy access to London Victoria and London Bridge, as well as many local stations, including Balham, Streatham, Sutton, Wimbledon and Kingston. We can also get the train to local tram stops. There are two local buses that stop just on the edge of the estate, both go through Mitcham, where other transport can be accessed. Ten minutes walk away are buses to Croydon and Streatham. These bus stops can also be accessed via the local buses. Whilst I appreciate that people with disabilities may find access difficult, it would not be because there is a lack of public transport. During our many previous meetings with Circle, one thing that was raised was the good transport links, with people who have moved to Eastfields as it's easy for them to get to London for work. The cynical amongst us are wondering whether this is being 'played down', as new properties could bring a premium price being so close to the station. //To be honest, I could add more points but I have run out of both time and motivation (I can hear you cheering!!). And have no faith that these comments will be acknowledged, especially as they are the same comments that we, as residents, have put to both Merton Council and Circle Housing time and again, and which continue to be ignored.</p>	Transport	Site analysis	As set out in paragraph 3.16 (site analysis for Eastfields), while public transport access to and from Eastfields has greatly improved since Mitcham Eastfields train station opened in 2008, the station currently has two trains an hour to central London and the south east. Two bus routes serve the area (Tamworth Lane, Grove Road, Woodstock Way). This leads to the Public Transport Accessibility Level being defined as low (between 1b and 3 across the estate) according to Minor Modification 08.)
13600SAV	Savills / Clarion / Latimer	All Three	<p>Submission Draft Estates Local Plan Consultation</p> <p>Representations made on behalf of Latimer Developments Limited</p> <p>Further to the issue of the 'Submission Draft Estates Local Plan – Stage 3 Consultation (December 2016 – February 2017) we write to make formal representations to the consultation on behalf of Latimer Developments Limited (Latimer).</p> <p>Circle Housing Merton Priory and Latimer Developments Limited</p> <p>The Submission Draft Estates Local Plan (ELP) refers to Circle Housing Merton Priory (CHMP) as the body to which the three estates were transferred to. Merton Priory Homes (which trades as Circle Housing Merton Priory) was formed in 2010 as a result of the transfer of stock from Merton Council and at that time became a subsidiary within the Circle Housing Group. Circle Housing Merton Priory owns and manages around 9,500 homes across Wimbledon, Morden and Mitcham including the Eastfields, High Path and Ravensbury estates. In November 2016 the Circle Housing Group merged with the Affinity Sutton Group (through a merger of the two parent companies, Circle Anglia Limited and Affinity Sutton Group Limited) to become Clarion Housing Group. Clarion Housing Group is the largest housing group in the country with over 125,000 homes. The merged organisation comprises the parent company, Clarion Housing Group Limited, a number of charitable housing associations, including Circle Housing Merton Priory, a charitable foundation and a commercial company called Latimer Developments Limited..</p> <p>As part of the Merton Regeneration Project, Latimer and Circle Housing Merton Priory plan to regenerate the Eastfields, High Path and Ravensbury estates.</p>	General	N/A	Noted. Minor amendment proposed throughout plan: Circle Housing Merton Priory Clarion Housing Group.
13700SAV	Savills / Clarion / Latimer	All Three	<p>Overview</p> <p>Latimer welcomes the Council's support for regeneration and intensification of the estates as set out in the Draft Local Plan and for the broad changes and alterations made since the Stage 2 Consultation.</p> <p>Latimer (and Savills as their planning agent) also request to participate in the examination hearings on Merton's ELP and to be notified when the document is adopted.</p> <p>As you will be aware, Latimer is at an advanced stage of preparation of the outline planning applications for the three estates and it is anticipated that these will be submitted prior to the examination hearings.</p> <p>Following a thorough review of the latest draft ELP, we have a number of minor comments and suggested amendments that we discuss in the following sections.</p>	General	N/A	Noted
13800SAV	Savills / Clarion / Latimer	All Three	<p>Comprehensive Regeneration</p> <p>Latimer has undertaken an extensive feasibility and discounting exercise in selecting these three Estates for regeneration. Latimer has considered a number of alternative options, such as meeting Decent Homes Standards only, as set out in the Case for Regeneration and after extensive assessment recognises that the full regeneration of High Path and Eastfields and the partial regeneration of Ravensbury presents the greatest opportunity to realise significant physical, social, economic and environmental benefits for not only the Estates but the wider Borough. Latimer is therefore supportive of the Council for bringing forward the DPD to aid the comprehensive regeneration of each of the Estates.</p> <p>The DPD at paragraph 2.21 refers to "comprehensive regeneration". Whilst Latimer is committed to the delivery of all three schemes, in planning terms planning permission could be granted for them individually. As such it would be helpful if the DPD recognised that the schemes are not mutually dependable and that they could therefore be granted planning permission separately should this be required.</p>	General	N/A	<p>Noted. Whilst the applications could be submitted separately, Clarion Housing Group have advised that delivery of regeneration of the three estates is extricably linked due to viability. Clarion Housing Group have decided that regeneration is the most cost effective way of delivering longer term sustainable Decent Homes through the provision of new well designed energy efficient homes that will meet the needs of residents now and in the future. The regeneration of Eastfields and Ravensbury is also financially dependent on High Path regeneration coming forward. The council has resolved, most recently in November 2016, to consider and support the Estates Local Plan on the basis of all three estates coming forward. This is stated as a key driver (in the Key Drivers section, see heading "Delivering regeneration across all three estates") Recommended for additional clarity to add following sentence to the end of the paragraph 2.21 (Modification 3)</p> <p><i>Merton Council's resolutions in July 2014 to explore regeneration via the creation of an Estates Local Plan and in November 2016 to submit the Estates Local Plan to the Secretary of State have been made on the basis of the three estates being linked as part of a single regeneration programme. .</i></p>
13900SAV	Savills / Clarion / Latimer	All Three	<p>Development Plan</p> <p>The draft ELP will form part of the development plan and as such it is important to make it clearer, that any planning application must have regard to the whole development plan, including The London Plan (2016), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, unless material considerations indicate otherwise. This is an important legislative context that should be included within the DPD. This is currently not clear in paragraph 2.8 of the draft ELP.</p>	General	N/A	<p>Agreed. Recommend the following three modifications for additional clarity</p> <p>Modification 4 Page 20 add new para after 2.26 stating: Para 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:</i> <i>-The Mayor's London Plan 2016</i> <i>- Merton's Core Planning Strategy 2011</i> <i>-The South London Waste Plan 2012</i> <i>-Sites and Policies Plan 2014</i> <i>- Policies map 2014</i></p> <p>Modification 5 Para 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>Modification 6 Insert the following paragraph 2.33 ... HighPath and Ravensbury estates as indicated in the respective maps overleaf. <i>These indicate specific boundaries for the Policies Map of the three estates to which the Estates Local Plan policies apply. .</i> Upon adoption of the Estates Local Plan</p>
14000SAV	Savills / Clarion / Latimer	All Three	<p>Large Sites and Surrounding Character</p> <p>As we stated in our previous representations, the London Plan Policy 3.7 identifies that large sites (measuring 5ha or more) are able to create their own distinct character and support higher densities. This is further supported within the GLA Housing SPG paragraph 1.3.35 which refers to sites over 2ha being a large site and therefore able to create their own character and define their own setting. Whilst it is</p>	Design	Planning Application	<p>No change proposed. It is an important design aim, reinforced in policy at various levels (NPPF, London Plan, Core Planning Strategy; Sites and Policies Plan) that design should relate and respond positively to its context. It is the aim of the Estates Local Plan to ensure that new development on the estates fits well and harmoniously with its surroundings and does not t repeat past mistakes, some of which are the reasons why regeneration is considered necessary now. This is particularly noticeable with High Path and Eastfields, where the urban form is either fragmented or alien to what it surrounds. It is therefore not</p>

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

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

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

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103000SA	Sport England	All Three	Eastfields Policy EP E4 Land Use, High Path Policy EP H4 Land Use and Ravensbury EP R4 Land Use Objection These policies should specifically mention indoor and outdoor sports facilities and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', to ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.	Environment	Land Use E4 H4 R4	<p>Minor Modification 04 and 05 proposed to clarify that development proposals across the three estates will be assessed against the statutory development plan at the time of any planning application, including the Estates Local Plan, Merton's Core Planning Strategy, London Plan 2016 and Sites and Policies Plan .</p> <p>Minor modification 4 Page 20 add new Paragraph after 2.26 stating: Paragraph 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:-The Mayor's London Plan 2016- Merton's Core Planning Strategy 2011-The South London Waste Plan 2012-Sites and Policies Plan 2014-Policies map 2014</i></p> <p>Minor modification 5 Paragraph 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>The priority of these Estates is for residential re-generation. This land has not been specially identified for the development of sports facilities however the consideration of sports facilities (See paragraphs 3.72 and 3.179) is enabled through the proposed open space policies. Where there is justification for the provision of a large public open space the Estates Plan encourages design to include sports courts and the plan states that development proposals for such spaces must be in accordance with para.74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>The Estates Local Plan does not duplicate policies in the rest of the adopted Local Plan (e.g. sports and recreation At the planning application stage applications to develop these estates will need to be assessed against Merton's Core Strategy Policies including Policy CS13 (h Leisure and Culture) which promotes new and improved sport and recreation facilities and Merton's Sites and Policies Plan Policy DM 01 (Open Space) which encourages the protection and enhancement of playing fields and opportunities for sport, recreation and play. London Plan policies 3.16 (Protection and enhancement of social infrastructure) and 3.19 (Sports Facilities) would also need to be considered. Proposed development and potential needs would also be assessed against Merton Council's Merton Sports Pitch Strategy (June 2011).</p> <p>The council prepared a Playing Pitch Study with Sport England in 2011. This strategy examines the boroughs supply and demand for pitches and the potential future requirements for pitch sports needs in Merton from 2012-2026, particularly in the first five years (to December 2016). From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Playing Pitch Study to inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport england on the scope of the new strategy to ensure it meets their requirements.</p>
104000SA	Sport England	All Three	Eastfields Policy EP E5 Open Space, High Path Policy EP H5 Open Space and Ravensbury Policy EP R5 Open Space. Objection These policies should specifically mention outdoor sports facilities and playing pitches and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', to ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.	Environment	Open Space E5 H5 R5	<p>Minor Modification 04 and 05 proposed to clarify that development proposals across the three estates will be assessed against the statutory development plan at the time of any planning application, including the Estates Local Plan, Merton's Core Planning Strategy, London Plan 2016 and Sites and Policies Plan .</p> <p>Minor modification 4 Page 20 add new Paragraph after 2.26 stating: Paragraph 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:-The Mayor's London Plan 2016- Merton's Core Planning Strategy 2011-The South London Waste Plan 2012-Sites and Policies Plan 2014-Policies map 2014</i></p> <p>Minor modification 5 Paragraph 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>The priority of these Estates is for residential re-generation. This land has not been specially identified for the development of sports facilities however the consideration of sports facilities (See paragraphs 3.72 and 3.179) is enabled through the proposed open space policies. Where there is justification for the provision of a large public open space the Estates Plan encourages design to include sports courts and the plan states that development proposals for such spaces must be in accordance with para.74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>The Estates Local Plan does not duplicate policies in the rest of the adopted Local Plan (e.g. sports and recreation At the planning application stage applications to develop these estates will need to be assessed against Merton's Core Strategy Policies including Policy CS13 (h Leisure and Culture) which promotes new and improved sport and recreation facilities and Merton's Sites and Policies Plan Policy DM 01 (Open Space) which encourages the protection and enhancement of playing fields and opportunities for sport, recreation and play. London Plan policies 3.16 (Protection and enhancement of social infrastructure) and 3.19 (Sports Facilities) would also need to be considered. Proposed development and potential needs would also be assessed against Merton Council's Merton Sports Pitch Strategy (June 2011).</p> <p>The council prepared a Playing Pitch Study with Sport England in 2011. This strategy examines the boroughs supply and demand for pitches and the potential future requirements for pitch sports needs in Merton from 2012-2026, particularly in the first five years (to December 2016). From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Playing Pitch Study to inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport england on the scope of the new strategy to ensure it meets their requirements.</p>
105000SA	Sport England	All Three	OBJECTION – Local Plan & Evidence Base. The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that: "Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area ." Paragraph 175 of the NPPF states: "Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan ." Sport England is not aware of a robust evidence base for playing pitches and indoor sports facilities for Merton. It is not clear how this lack of evidence base has been/will be taken into account to develop this document.	Environment	Planning Application	<p>Minor Modification 04 and 05 proposed to clarify that development proposals across the three estates will be assessed against the statutory development plan at the time of any planning application, including the Estates Local Plan, Merton's Core Planning Strategy, London Plan 2016 and Sites and Policies Plan .</p> <p>Minor modification 4 Page 20 add new Paragraph after 2.26 stating: Paragraph 2.26a (new 2.27) <i>In the wider planning context there are a number of documents that make up the statutory Development Plan for the borough. These are as follows:-The Mayor's London Plan 2016- Merton's Core Planning Strategy 2011-The South London Waste Plan 2012-Sites and Policies Plan 2014-Policies map 2014</i></p> <p>Minor modification 5 Paragraph 2.26b (new 2.28) <i>The above five documents make up the Statutory Development Plan for the borough. These contain the planning policies that guide development in Merton. Merton's Estates Local Plan, once adopted, will sit alongside these documents and form part of Merton's Local Plan.</i></p> <p>The priority of these Estates is for residential re-generation. This land has not been specially identified for the development of sports facilities however the consideration of sports facilities (See paragraphs 3.72 and 3.179) is enabled through the proposed open space policies. Where there is justification for the provision of a large public open space the Estates Plan encourages design to include sports courts and the plan states that development proposals for such spaces must be in accordance with para.74 of the NPPF and Sport England's Land Use Policy Statement 'Planning for Sport Aims and Objectives'.</p> <p>The Estates Local Plan does not duplicate policies in the rest of the adopted Local Plan (e.g. sports and recreation At the planning application stage applications to develop these estates will need to be assessed against Merton's Core Strategy Policies including Policy CS13 (h Leisure and Culture) which promotes new and improved sport and recreation facilities and Merton's Sites and Policies Plan Policy DM 01 (Open Space) which encourages the protection and enhancement of playing fields and opportunities for sport, recreation and play. London Plan policies 3.16 (Protection and enhancement of social infrastructure) and 3.19 (Sports Facilities) would also need to be considered. Proposed development and potential needs would also be assessed against Merton Council's Merton Sports Pitch Strategy (June 2011).</p> <p>The council prepared a Playing Pitch Study with Sport England in 2011. This strategy examines the boroughs supply and demand for pitches and the potential future requirements for pitch sports needs in Merton from 2012-2026, particularly in the first five years (to December 2016). From 2017 the council will be preparing a new borough-wide Local Plan which will include a new Playing Pitch Study to inform new borough-wide policies on sports and recreation, should any be needed. The council would welcome discussion with Sport england on the scope of the new strategy to ensure it meets their requirements.</p>

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

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

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

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

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

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

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

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

Alphabetical order by representor

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

All Statutory responses

Stage 2 Consultation – Draft Estates Local Plan

February 2016 – March 2016

18 March 2016

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Dear Sir / Madam

**Draft Estates Local Plan Consultation
Representations made on behalf of Circle Housing Merton Priory**

Further to the issue of the 'Draft Estates Local Plan Stage 2 Consultation (1st February 2016 – 18th March 2016) we write to make formal representations to the consultation on behalf of Circle Housing Merton Priory (CHMP). CHMP is the majority land owner and will be delivering the regeneration of the Estates.

The Council transferred its housing stock to CHMP in 2010, which under the agreement CHMP was required to upgrade all homes to Decent Homes Standards. In pursuing this it has become clear that this does not present the most appropriate solution for investing in the sites and as such CHMP has been exploring options for the regeneration of the existing High Path, Eastfields and Ravensbury Estates, the subject of this draft Estates Local Plan. Accordingly, CHMP has undertaken extensive analysis of housing need, stock condition, the sites and their surrounding context, which has informed this response to the consultation.

CHMP welcomes the Council's support for regeneration and intensification of the land use set out in the draft Estates Local Plan. It is noted 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.

Following a thorough review of the draft Estates Local Plan, we have a number of key concerns that we identify and discuss in the following sections. In addition to this letter we enclose a schedule of detailed comments which highlight issues with specific policies, text and diagrams and provides suggestions for amendments to the draft Development Plan Document (DPD).

The 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.

We expand further on these concerns below.

Development Plan

The draft Estates Local Plan will form part of the development plan and as such it is important to emphasise within the DPD, 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, unless material considerations indicate otherwise. This is an important legislative context that should be included within the DPD.

Housing Need and Delivery

A section on Housing Need and Delivery should be included within the 'Key Drivers' Section set out in Chapter 2 of the draft Estates Local Plan. The Evidence Base for each estate includes a Housing Needs Assessment, and housing need is of national, regional and local importance as set out in prevailing planning policies. It is therefore important that housing need is identified as a key driver for the Estates Local Plan.

The NPPF, at paragraph 47, requires local authorities to significantly boost the supply of housing and using their evidence base should plan for the full objectively assessed needs for market and affordable housing, and identify strategic sites which are critical to the delivery of the housing strategy. The London Plan recognises the pressing, and desperate, need for more homes in London and therefore sets average annual minimum housing supply targets for each borough until 2025 (which are also expected to be exceeded by local authorities). A minimum annual housing target of 49,000 new homes per year is set for London, with Merton required to deliver a minimum 1,194 new homes per year. This is significantly higher than that envisaged within the Merton Core Strategy (minimum of 4,800 between 2011 to 2026) and as such there is a requirement for the Council to meet a higher identified housing need and therefore optimise the housing potential of these sites. At paragraph 3.19, the Mayor further recognises that the housing supply targets are set "*...as minima, augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply*". The supporting text goes on to recognise that intensification areas and other large sites could provide a significant increase to housing supply.

In addition to highlighting the housing need of the Borough as per the above, a summary of the Housing Needs Assessment for each Estate should be included, particularly as this forms part of the evidence base for the Estates Local Plan.

Large Sites

The London Plan Policy 3.7 identifies that large sites (measuring 5ha or more) are able to create their own distinct character and support higher densities. This is further supported within the GLA Housing SPG paragraph 1.3.35 which refers to sites over 2ha being a large site and therefore able to create their own character and define their own setting. Notwithstanding this, it is recognised that development proposals should integrate with the wider area, however, as each of the estates are large sites, the policies should provide flexibility for the development proposals to create their own distinct character. Eastfields and High Path are large sites as defined by London Plan Policy 3.7 and all three sites are large sites as defined in the Housing SPG. It is therefore appropriate for this to be recognised and referred to throughout the DPD.

Conflict Between Policies

There are a number of examples of conflict between policies within the draft Estates Local Plan which we highlight in the following paragraphs and within the Comments Schedule.

The design teams have undertaken a detailed analysis of applying the height restrictions set out in the draft DPD on each site and the resultant impact on housing delivery and scheme viability. The draft height restrictions are considered to be too prescriptive and this will impact on the ability to optimise the potential of each site. It is therefore recommended that the height restrictions are made more flexible to allow a design-led process to optimising housing potential on the Estates.

At High Path, there is concern in relation to the blanket height range of 5 to 6 storeys that is being applied across the site, as this will impact on the level of accommodation that can be delivered, particularly as this is a 'large site' capable of creating its own character and also because of its location within an Area of Intensification. PRP Architects has undertaken an analysis that applying the proposed building heights would result in the delivery of significantly less units than the 1,802 that the DPD anticipates could be delivered. This would be contrary to paragraph 3.173 of the draft DPD which confirms that the Council is seeking higher densities on the Estates.

A similar analysis of the application of policies on Eastfields and Ravensbury has been undertaken by the design teams, and in both cases, the fixed height restrictions and other draft policy requirements will surpass the quantum of housing that can be delivered such that it will impact on the ability to optimise housing delivery and such that it will impact on scheme viability. The deliverability of the regenerations will be compromised as a result and this is a significant concern for CHMP. As noted, these are both large sites capable of creating their own character; therefore, fixed height restrictions are not considered appropriate.

The draft policies in relation to building heights at Eastfields (page 72 of the DPD) and Ravensbury (page 166 of the DPD) refer to scale of vegetation and views of trees as being the driver for the consideration of height. Further, the policy reference to scale of vegetation is open to interpretation and therefore it is not clear whether height above the trees will be acceptable. It is not appropriate that the Council considers trees to be the only driver for determining building heights having regard to London Plan Policies 7.4 (Local Character) and 7.7 (Architecture). The Council also recognises that there are other factors affecting the design of development at Policy DM D2 of the Sites and Policies DPD, which states that proposals should "*Relate positively and appropriately to the siting, rhythm, scale, density, proportions, height, materials and massing of surrounding buildings and existing street patterns, historic context, urban layout and landscape features of the surrounding area*". Taking this into account, it is suggested that reference to the scale of vegetation and views is removed.

The NPPF at paragraph 173 supports the consideration of viability in plan-making stating that "*Plans should be deliverable*". As such it is considered appropriate that the policies are amended to allow the height of buildings, and other design parameters, to be informed by an urban design analysis to ensure that housing delivery is optimised and a viable design solution for the estate regeneration is realised.

Prescriptive Policies

Paragraph 2.4 of the draft DPD introduces the plan as a 'wholly design-led' document and is stated as being *'pitched at a high level, with detailed scheme proposals determined by the Council at the planning application stage should regeneration go ahead'*. This general approach is supported but this approach has not been followed through in the policies and supporting text of the draft Plan.

The overall tone of the draft DPD is overly prescriptive particularly as this is implied by the Council at paragraph 2.4 as being a framework document. Furthermore, as set out already, any planning application for the regeneration of the Estates would have to be determined in accordance with the whole development plan, and not just the policies within the Estates Local Plan. The Estates Local Plan should not therefore be applied mechanistically to regeneration proposals at the application stage, and this should be made clear within the wording of the DPD.

Flexibility should also be introduced into the document, in line with the suggestions in the enclosed Comments Schedule, to ensure that the regeneration proposals can offer viable sustainable solutions that provide the opportunity for genuine place-making. As already noted, these are all large sites capable of creating their own character; therefore, the DPD should provide the flexibility required to allow this. Paragraph 59 of the NPPF, states that *'design policies should avoid unnecessary prescription or detail'*. The Planning Practice Guidance (PPG) (ref: 12-010-20140306) also states that Local Plans *"...should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability."* Further, given that the regeneration of the Estates will be delivered over a number of years it is considered entirely appropriate that flexibility should be built in to the DPD to allow development proposals to respond to changing circumstances in order to create successful places. This approach would be entirely consistent with the NPPF and the PPG.

Intensification Areas

Policy 2.13 of the London Plan identifies South Wimbledon / Colliers Wood as an Intensification Area. High Path is within this Intensification Area and this should be acknowledged within the Estates Local Plan. Further, it should also be recognised that London Plan Policy 3.7 encourages higher densities in Intensification Areas.

Existing Analysis

There are a number of inconsistencies in the existing analysis of the Estates, which are identified within the Comments Schedule. It is important that the existing analysis is accurate and reflects the existing situation. This is reinforced at paragraph 158 of the NPPF which requires that the Local Plan is based on *"...adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area"*.

Timeline

Having regard to local plan preparation requirements, the second consultation on the draft document may not be necessary. There is no requirement under the Town and Country Planning (Local Planning) (England) Regulations 2012 that a second round of consultation on the draft Local Plan is undertaken. A second consultation would impact the programme for the DPD which would have subsequent impact on the submission of the regeneration outline applications. Of significant consequence would be the impact on the early delivery of housing for which there is an identified need (at national, regional and local level). This would be at odds with DCLG's political priority for early housing delivery through estate regeneration and as such the requirement of a second consultation should be carefully assessed.

St Marks Academy

CHMP support that the Council has identified an opportunity for potential redevelopment at the St Marks Academy site. Should this additional site come forward it will enhance the regeneration of the area, with

potential to provide a kickstart site for additional housing at Eastfields. This will assist in decant needs, enabling regeneration to come forward earlier and enabling the regeneration to be completed within a shorter timeframe. CHMP are engaging with the Academy regarding this opportunity and will keep the Council updated on these discussions. It is important that this opportunity is reflected within the DPD, with flexibility to allow the site to come forward, but that it does not delay the DPD adoption process.


Summary

CHMP welcome the Council's support for the regeneration and intensification of the three Estates. There are however a number of concerns with the draft DPD, highlighted above and within the enclosed Comments Schedule. CHMP welcomes the opportunity to discuss these concerns with the Council in order to ensure flexibility within the policies can be achieved. It is also important to reinforce the importance of a short programme for the adoption of the DPD to support the early housing delivery through a design led, sustainable and viable regeneration solution for the Estates.

CHMP reserve the right to submit additional representations to those set out, having regard to the detailed planning, design, technical and viability analysis that they are undertaking as part of the preparation of the masterplans for the three estates.

Should you have any queries please do not hesitate to contact me or my colleague Catherine Bruce on 020 3320 8286 / cbruce@savills.com. We look forward to receiving convenient dates to meet to discuss the evolving DPD.

Yours faithfully

A handwritten signature in black ink, appearing to be the initials 'CB' followed by a stylized flourish.

pp. Jane Barnett
Director

Enc. Comments Schedule 18/03/2016

**Estates Local Plan Consultation:
Comment Schedule 18 March 2016**



Page, Para Reference	DPD text	Suggested Change	Justification / Comments
GENERAL COMMENTS			
General		Paragraph 2.4 of the draft DPD introduces the plan as a 'wholly design-led' document and is stated as being 'pitched at a high level, with detailed scheme proposals determined by the Council at the planning application stage should regeneration go ahead'. Having regard to this, the overall tone of the draft DPD is considered to be overly prescriptive particularly as this is a framework document. Flexibility should be introduced into the document and policies, in line with the suggestions below, to ensure that designs can offer viable sustainable solutions that provide the opportunity for genuine place-making.	<p>Policies should refrain from being overly prescriptive in accordance with paragraph 59 of the NPPF, which states that 'design policies should avoid unnecessary prescription or detail'. The PPG (ref: 12-010-20140306) also states that Local Plans "...should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability."</p> <p>Flexibility in Local Plans is reiterated within the Design section of Planning Practice Guidance (PPG) which notes that 'successful places can adapt to changing circumstances and demands. They are flexible and able to respond to future needs'. Given that the regeneration will take place over a number of years it is entirely appropriate to ensure flexibility is built into the DPD.</p> <p>Paragraph 173 of the NPPF states that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking'. An appreciation and details of viability, and the financial implications of plan policies should therefore run throughout the DPD.</p>
General - Chapter 2	A housing section is required within the DPD to set context perhaps at the introduction sections.	A section needs to be added in Chapter 2 defining housing need as a key driver.	Please see cover letter for further justification.
General Comment		The proposed diagrams included within the DPD, for example, land use and heights diagrams are not considered to be necessary and are overly prescriptive. Should the local authority continue to include these diagrams it needs to be made clear that these are indicative diagrams and not in any way to be strictly applied.	The evidence base for the diagrams should be made available as "appropriate and proportionate evidence is essential for producing a sound Local Plan" (PPG ref: 12-014-20140306) and the "evidence needs to inform what is in the plan..." Further as set out at para 158 of the NPPF "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area".
General		Include reference to Intensification Area throughout the development where relevant. High Path is identified as being within the South Wimbledon / Colliers Wood Intensification Area as defined at Map 2.4 and Policy 2.13 of The London Plan (2015).	<p>Page 79 of the London Plan provides a list of Opportunity and Intensification Areas. South Wimbledon / Colliers Wood (Number 44 on this list) is highlighted as being an Area of Intensification. High Path is within the Area of Intensification. Policy 2.13 of the London Plan provides the policy framework behind Intensification Areas which includes the requirement to 'provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential in terms of Annex 1, recognising that there are different models for carrying these forward'.</p> <p>Annex 1 in regards to the South Wimbledon/Colliers Wood Intensification Area states that the 'location contains a range of major opportunities for intensification including South Wimbledon and Colliers Wood' with a minimum number of new homes set at 1,300. Policy 2.13 goes on to state that development proposals should 'contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1...'</p>
General		The DPD should acknowledge throughout that the Estates are large enough to define their own setting, character and density.	<p>The DPD needs to reflect the status of the Estates as 'large sites' which resultanty can define their own setting. In particular, Housing SPG 1.3.35 states that 'Typically, sites over two hectares usually have the potential to define their own setting'. It is acknowledged that the sites must integrate and improve the area functionally but that they can create their own different and distinct character.</p> <p>As a result of their size, these sites can additionally accommodate higher densities. This is supported within the London Plan at Policy 3.7 which refers to large sites (over 5 hectares) and that these should be 'progressed through an appropriately plan-led process to encourage higher densities'.</p> <p>Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.</p>
General		Alter reference from 'Local Plan' to 'Estates Local Plan' throughout the whole document	There are other Development Plan Documents that comprise the Council's Local Plan. Any planning application must be determined in accordance with the development plan as a whole, including the London Plan, Core Strategy and Sites and Policies DPD, in accordance with S38(6) of the Planning and Compulsory Purchase Act 2004.
12, 2.3	"Should regeneration go ahead this Estates Local Plan will be an essential part in shaping redevelopment process..."	"Should regeneration go ahead this Estates Local Plan will be an essential part in provide a framework for shaping the redevelopment process..."	This statement is too prescriptive on the role of the Estates Local Plan. The NPPF (Para 59) states that 'design policies should avoid unnecessary prescription or detail' and goes on to comment that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles' (Para 60). This is further supported by the Design PPG noting that 'to promote speed of implementation, avoiding stifling responsible innovation and provide flexibility, design codes should wherever possible avoid overly prescriptive detail and encourage sense of place and variety'.
15, 2.9	The objectives at paragraph 2.9 are not listed in an order consistent with the NPPF	To make Merton a well connected place where walking, cycling and public transport are the modes of choice when planning all journeys. • To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space. • 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. • To promote social cohesion and tackle deprivation by reducing inequalities. • To provide new homes and infrastructure within Merton's town centres and residential areas, through physical regeneration and effective use of space. • 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. • To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place. • To make Merton a healthier and better place for people to live, work in or visit.	This should be re-ordered in line with the NPPF priorities.

15, 2.10 and 2.11	<p>2.10 A Sustainability Appraisal (SA) which incorporates a Strategic Environmental Assessment (SEA) has been undertaken in the preparation of the Draft Estates Local Plan and has assisted in the shaping of the document. The purpose of SA/SEA is to promote sustainable development by integrating social, economic and environmental considerations into the preparation of the new Local Plan.</p> <p>2.11 The SA/SEA is also an important tool for developing sound planning policies which are consistent with the government's sustainable development agenda and achieving the aspirations of local communities.</p>	<p>2.10 A Sustainability Appraisal (SA) which incorporates a Strategic Environmental Assessment (SEA) has been undertaken in the preparation of the Draft Estates Local Plan and has assisted in the shaping of the document. The purpose of SA/SEA is to promote sustainable development by integrating economic, social, economic and environmental considerations into the preparation of the new Local Plan.</p> <p>2.11 The SA/SEA is also an important a tool for developing sound planning policies which are consistent with the government's sustainable development agenda and achieving the aspirations of local communities.</p>	<p>Paragraph 2.10 should be reordered in line with the NPPF priorities. Delete reference to SA as an "important" tool, as it is part of a suite of tools for developing planning policies.</p>
18, 2.22	<p>Planning applications that accord with the policies in this Local Plan...</p>	<p>Planning applications that accord with the policies in this Local Plan the Development Plan...</p>	<p>Planning applications should accord with the development plan unless material considerations state otherwise in accordance with S38(6) of the Planning and Compulsory Purchase Act 2004.</p>
18, 2.23	<p>...to achieve the optimal balance of positive social, environmental and economic outcomes....</p>	<p>...to achieve the optimal balance of positive economic, social and environmental and economic outcomes....</p>	<p>To re-order social, environmental and economic references in line with NPPF priorities.</p>
18, 2.24	<p>An assessment of Merton's Site and Policies DPD has been conducted...</p>	<p>This paragraph should be revisited as it is unclear whether reference should be made to the Sites and Policies DPD at this stage in the DPD.</p>	<p>Review and update for clarity.</p>
20		<p>A summary of the Case for Regeneration for each of the Estates should be included as a key driver.</p>	<p>This should include a short statement taken from Savills Case for Regeneration, as this is identified one of the Key Drivers on page 17. The summary should also refer to meeting the housing need of the estates, whilst also contributing to the wider Borough minimum targets set by The London Plan (Table 3.1).</p>
20, 2.25	<p>CHMP have undertaken technical surveys and financial planning work...</p>	<p>CHMP have undertaken technical impact assessments, surveys and financial planning work...</p>	<p>CHMP have undertaken a substantial number of technical impact assessments that support their emerging proposals for the Estates and these should therefore be referenced.</p>
20, 2.28	<p>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 long term...</p>	<p>Add a sentence at the end of paragraph 2.28 as follows: Incremental refurbishment is a short term fix that will not be sufficient to meet longer term housing needs and results in comprehensive regeneration proposals being economically unviable for CHMP as the delivery partner.</p>	<p>This policy should include more emphasis on the fact that a "short term fix" will not be sufficient to meet the longer term housing needs of the Estate and will not be economically viable for Circle Housing as the delivery partner. Additionally paragraph 173 of the NPPF states that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking'.</p>
p23	<p>High Path red line plan</p>	<p>Amended red line plan to be included (as per the enclosed) to ensure Nos. 68A and B are included, as well as all relevant portions of the footpath and public realm.</p>	<p>Please see attached correct red line plan boundary (Attachment 1)</p>
p24	<p>Ravensbury red line plan</p>	<p>Amended red line plan to be included (as per the enclosed).</p>	<p>Please see attached correct red line plan boundary (Attachment 2)</p>
26, 2.33	<p>"The creation of sustainable, well designed safe neighbourhoods with good quality new homes, that maintain and enhance the local community, improve living standards and create good environments."</p>	<p>"The creation of sustainable, well designed safe neighbourhoods with good quality new homes, that maintain and enhance the local community, improve living standards and create good environments through viable regeneration"</p>	<p>An appreciation and details of viability and the financial implications of plan policies should run throughout the DPD. Paragraph 173 of the NPPF states that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking'.</p>
Page 26, 2.34	<p>The creation of a new neighbourhood with traditional streets and improved links to its surroundings, that supports the existing local economy. 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 terraced streets, front doors to streets, use of brick and good internal design and access to quality amenity space.</p>	<p>The creation of a new vibrant neighbourhood with 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 quality, form and character, using land efficiently to make the most of good transport services and create a distinctly urban character based on "New-London-Vernacular" of traditional streets, front doors to streets, use of predominantly brick, homes with good internal design and access to quality amenity space.</p>	<p>NPPF Para 60. comments that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness'. Consequently, committing to one type of architecture may be too prescriptive. The New London Vernacular can take a variety of forms and works very successfully, but over the lifespan of the DPD and regeneration which is anticipated to be 10 years, this could result in a lack of place making. The vision should be balanced between aspiring and future proofing the development.</p>
28, 2.37	<p>New development must be designed to have buildings with entrances and windows facing the street...and no blank walls or gable ends.</p>	<p>New development must be designed to have buildings with entrances and windows facing the street...and no should avoid blank walls or gable ends unless justified by detailed design analysis</p>	<p>The NPPF Para 59 directs against applying unnecessary prescription or detail within design policies. Reference should be made to avoiding blank walls and gable ends wherever possible as it may be unavoidable on some occasions.</p>
28, 2.38	<p>Irregular building lines and building heights undermine this and should therefore be avoided.</p>	<p>Irregular building lines and building heights undermine this and should therefore be avoided unless justified by detailed design analysis</p>	<p>As above.</p>
28, 2.39	<p>All private, communal and public amenity space must be of a high quality of design, attractive, useable, fit for purpose and meet all policy requirements, including addressing issues of appropriate facilities, replacement space or identified shortfall.</p>	<p>All private, communal and public amenity space must be of a high quality of design, attractive, useable, fit for purpose and meet all policy requirements, including addressing issues of appropriate facilities, replacement space or identified shortfall unless justified by amenity and open space analysis</p>	<p>It is not always appropriate to meet "all policy requirements" and these will need to be balanced with other planning issues and benefits which should be considered on balance. Section 38(6) of the Planning and Compulsory Purchase Act allows for deviations from development plan policy where material considerations justify such an approach.</p>
p29, 2.43	<p>New development should be sustainable in terms of supporting local social and economic development to support community development, making use of sustainable travel modes the first choice, encouraging community based car sharing schemes and facilitating improved health and well-being such as enabling local food growing and are encouraged to implement aims set out by the Merton Food Charter.</p>	<p>New development should be sustainable in terms of supporting local social and economic development to support community development, for example by making use of sustainable travel modes the first choice, encouraging community based car sharing schemes and facilitating improved health and well-being such as enabling local food growing and are encouraged to implement aims set out by the Merton Food Charter.</p>	<p>The NPPF requires Local Plans to be prepared with the objective of contributing to the achievement of sustainable development (para 151) and that 'Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three' (Para 152). As such full consideration will need to be given to the potential community development provision through the masterplan preparation process and as such the DPD should not be prescriptive on what the potential provision should be.</p>
29, 2.45	<p>The London Plan density matrix should be applied in determining an appropriate density for each estate. Development that is too dense may result in cramped internal layouts, overlooking or daylight issues, or a high number of single (or nearly single) aspect dwellings. Development that is not dense enough will not use land efficiently and effectively or provide sufficient good quality homes.</p>	<p>This paragraph should be provided as the first Design Principle titled 'Optimising Density' and updated as follows: Development proposals should optimise the potential of the land and housing output. The London Plan density matrix should be applied in determining an appropriate density for each estate. Development that is too dense may result in cramped internal layouts, overlooking or daylight issues, or a high number of single (or nearly single) aspect dwellings. Development that is not dense enough will not use land efficiently and effectively or provide sufficient good quality homes. Density should not be applied mechanically and development proposals should have regard to other material considerations such as accessibility, design and local context.</p>	<p>Optimising the potential of land and housing output is not referenced as a Design Principle and it should be included in this section. The DPD should also reflect the position that the Estates are 'large sites' and therefore that they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.</p> <p>Furthermore, the Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'.</p>
30, 2.47	<p>The design, layout and appearance of new development must take inspiration and ideas from the positive elements of the local built, natural and historic context. This must include an analysis of what local characteristics are relevant and why, and which are less so. Opportunity must be taken to strengthen local character by drawing on its positive characteristics.</p>	<p>The design, layout and appearance of new development should take inspiration and ideas from the positive elements of the local built, natural and historic context wherever relevant, unless justified by detailed design analysis. This must include an analysis of what local characteristics are relevant and why, and which are less so. The London Housing SPG notes that 'Typically, sites over two hectares usually have the potential to define their own setting.' The Estates are large enough to define their own setting, to deliver higher density development and to create their own characteristics. Opportunities to create their own character should be taken. Opportunity must be taken to strengthen local character by drawing on its positive characteristics.</p>	<p>The DPD needs to reflect the status of the Estates as 'large sites' (as reflected in national policy) which resultantly can define their own setting. In particular, the Housing SPG 1.3.35 states that 'Typically, sites over two hectares usually have the potential to define their own setting'.</p> <p>As a result of their size, these sites can additionally accommodate higher densities. This is supported within the London plan which refers to large sites (over 5 hectares) and that these should be 'progressed through an appropriately plan-led process to encourage higher densities'.</p> <p>Additionally, opportunities to create and retain character of an area should be taken in line with NPPF Para 60 which states that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness'. This is supported by London Plan Policy 3.7 which notes that a plan-led process should encourage the creation of neighbourhoods with a 'distinct character'. Development proposals should integrate with the surrounding area but are large enough to create a different character.</p>

EASTFIELDS

44, 3.23	The estate itself is distinctive enough from its surroundings to form its own character	The estate itself is large enough and distinctive enough from its surroundings to form its own character	As above.
p48, 3.28	...Public Transport Accessibility Level (PTAL) score is low at only 2 which is defined as poor by the London Plan.	...Public Transport Accessibility Level (PTAL) score is low at only 2 which is defined as poor varies across the site ranging from 1b to 3 which defined as very poor to moderate by the London Plan.	The TIL PTAL plan shows a varying PTAL rating across the site and this should be reflected in the description of the current PTAL rate.
50, 3.31	...and include bib stores and parking in the centre.	...and include bib bin stores and parking in the centre.	Typo
p55		Include housing optimisation as an opportunity.	Optimising the potential of land and housing output is not referenced as an opportunity and it should be included in this section. The opportunity should also reflect the position that the Estate is a 'large sites' and therefore has the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.
p56, 3.45	Creating an east-west link will help to integrate the estate into the wider area. This could be achieved by creating a clearly visible eastwest through street between Tamworth Lane and Woodstock Way by fully connecting up Acacia Road, Mulholland Close and Clay Avenue. The creation of a clearly visible north-south street from Grove Road, through the estate to the southern boundary will also help to integrate the estate into wider area. This connectivity will enable the site to overcome its isolated feel by linking it to the area beyond.	Creating an east-west link will could help to integrate the estate into the wider area. This could be achieved by creating a clearly visible eastwest through street between Tamworth Lane and Woodstock Way by fully connecting up Acacia Road, Mulholland Close and Clay Avenue. The creation of a clearly visible north-south street from Grove Road, through the estate to the southern boundary will could also help to integrate the estate into wider area. This connectivity will enable the site to overcome its isolated feel by linking it to the area beyond.	The feasibility of such links will need to be explored through the masterplanning process for the Estate.
56, 3.46	The focal point could be at the intersection of the north-south and east-west streets	The focal point for the area should be along the northern east-west route of the site. A series of focal points of varying nature could be developed along Acacia Road, for example at the intersection of the north-south and east-west streets.	A series of focal points could be created along Acacia Road through the masterplanning process and should not be limited to a single focal point. The Design PPG comments that 'Successful places can adapt to changing circumstances and demands. They are flexible and are able to respond to a range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow focal points to develop through a design-led approach through the masterplanning process.
56, 3.47	Develop undesignated open spaces to allow for better distribution of functional open space throughout the estate. Retain existing established mature trees in the central green space. Make this, or a similar replacement(s) publicly accessible and a basis for the creation of new open space and potential local focal points, squares, communal gardens, food growing etc.	Develop undesignated open spaces to allow for better distribution of functional open space throughout the estate. Retain existing established mature trees in the central green space unless justified by an arboricultural survey and urban design analysis . Make this, or a similar replacement(s) publicly accessible and a basis for the creation of new open space and potential local focal points, squares, communal gardens, food growing etc.	Where possible existing trees will be retained on site; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible.
56, 3.48	Create visual connectivity to the generally attractive surroundings of the playground and cemetery and to make the BMX track less visually isolated. This could be achieved by retaining the mature trees surrounding the site, whilst thinning the smaller scrub and vegetation from between them, so opening out longer and wider views.	Create visual connectivity to the generally attractive surroundings of the playground and cemetery and to make the BMX track less visually isolated. This could be achieved by retaining the mature trees surrounding the site, whilst thinning the smaller scrub and vegetation from between them, so opening out longer and wider views. Visual links to the south and east should focus primarily on long views across the green cemetery space. The galvanised cemetery boundary fence is unattractive. Buildings and landscape treatment should be used to minimise its barrier like impact on the public realm.	Detailed urban design analysis and comments during public consultation have emphasised the importance of improving long views.
58,3.49	Landmark buildings should be located around the focal point at the intersection of the north-south and east-west streets.	Landmark buildings should be located around the focal points and gateways . focal point at the intersection of the north-south and east-west streets.	A series of focal points could be created along Acacia Road through the masterplanning process and should not be limited to a single focal point. The Design PPG comments that 'Successful places can adapt to changing circumstances and demands. They are flexible and are able to respond to range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow landmark buildings to develop at appropriate focal points and gateways to develop as a result of the masterplanning process.
58, 3.50	Landmark buildings could be differentiated by appearance and to a degree by height; however, they should be designed to ensure that they are sensitive to the general character of the rest of the development.	Landmark buildings could be differentiated by appearance and to a degree by height; however, they should be designed to ensure that they are sensitive to complementary to the general character of the rest of the development.	The site or the surrounding area is not identified as a heritage asset and as such the use of the word 'sensitive' is not appropriate. The London Plan simply states in Policy 7.4 that 'Development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings'.
p58, Policy EP E1 c)	EP E1 Townscape 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. 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. 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. d) The massing and layout of proposals should enable visual connectivity from within the estate to the attractive surroundings of the playground and cemetery.	EP E1 Townscape 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. 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. 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. Proposals should create focal points in the estate. The most suitable location for these are at key junctions and at gateways into the Estate. d) The massing and layout of proposals should enable visual connectivity from within the estate to the attractive surroundings of the playground and cemetery.	A series of focal points could be created along Acacia Road through the masterplanning process and should not be limited to a single focal point. The Design PPG comments that 'Successful places can adapt to changing circumstances and demands. They are flexible and are able to respond to range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow focal points to develop as a result of the masterplanning process.
64, Policy EP E4	The land use for the estate will remain residential with open space	The land use for the estate will remain predominantly residential with open space	London Plan Policy 3.7 on large scale residential developments supports the incorporation of non-residential uses stating that 'Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility'.
p64, 3.68	Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate such as business space or local retail facilities, these could be located at the focal point where the north-south and east-west streets intersect.	Where there is considered to be demand for, or the desire to, locate non-residential uses on the estate such as business space or local retail facilities, these could be located at the focal point where the north-south and east-west streets intersect at the focal points and gateways .	A series of focal points could be created along Acacia Road through the masterplanning process and should not be limited to a single focal point. The Design PPG comments that 'Successful places can adapt to changing circumstances and demands. They are flexible and are able to respond to range of future needs'. Therefore, the DPD should refrain from being overly prescriptive and incorporate flexibility to allow focal points to develop through a design-led approach.
64, 3.69	Eastfields is located within an area with a low Public Transport Accessibility Level and a suburban character. Taking account of these factors, and the existing number of homes, and application of the London Plan Matrix a range of 464 -644 (gross figure) new homes are anticipated on site.	Eastfields is currently located within an area with a low to moderate Public Transport Accessibility Level and a suburban character. Taking account of these factors, and the existing number of homes, and application of the London Plan Matrix a range of 464 -644 (gross figure) new homes are anticipated on site. This density range should not be applied mechanically and a design-led approach should be taken.	The DPD should also reflect the position that the Estates are 'large sites' and therefore they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'. Furthermore, the Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'. As such it is appropriate to add this to para 3.69.
p65	Diagram E4	Diagram to be deleted.	This diagram is unnecessary and should be removed.

p66, EP E5 Policy A	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.	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. Any shortfall in quantity will only be acceptable where this is robustly justified.	CHMP's assessment of the existing site has identified that some of the open space to the boundaries of the site is unusable and of a poor quality. As such it is appropriate that the policy focuses on improving the quality of open space with any shortfall to be robustly justified.
66, Policy EP E5 Policy 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	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, unless their loss can be justified by arboricultural or urban design analysis.	Where possible existing trees will be retained and incorporated into the regeneration; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken by CHMP which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible having regard to the findings of the arboricultural survey.
p66, EP E5 Policy D	All new houses should have gardens that meet or exceed current space standards.	All new houses should have gardens that meet or exceed current space standards.	This replicates Merton Development Management Policies and as such is not necessary to repeat in the Estates Local Plan.
p66, 3.72	The streets meeting the southern boundary with the cemetery should preferably do so in the form of pocket parks that can be utilised for a range of uses including allotments and food growing.	The streets meeting the southern boundary with the cemetery should preferably do so in could be in the form of pocket parks that can be utilised for a range of uses including allotments and food growing.	The DPD should therefore be worded to allow flexibility in the landscape and urban design, which will be informed through a design-led approach to the masterplanning process.
p68, EP E6 Policy B	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible...	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates...	The proposed amended wording should be consistent with London Plan Policy 5.13.
p68, 3.81	Reference to a culverted ditch	Reference to a culverted ditch	CHMP have undertaken physical surveys of the site which do not show the presence of this culverted ditch. If this reference is to be included please provide the evidence base for the existence of the ditch.
p70, Policy EP E7 Policy G	These trees should be retained and be used to inform the design of landscape arrangements for example to provide cues for the location of focal points.	These trees should be retained Existing trees of value should be retained unless justified by an arboricultural survey and urban design analysis and be used to inform the design of landscape arrangements for example to provide cues for the location of focal points.	The proposed amended wording would be consistent with Policy 7.21 of the London Plan. Trees will be retained where possible and any potential removal will be based on robust arboricultural and urban design analysis.
71, Diagram E7		Reduce extent of scrub removal on the southern boundary to only locations adjacent to the pocket parks.	The design intent is to maximise long views across the cemetery and tree canopies. If the diagram is to be retained the removal of scrub along the southern boundary should be based on an analysis of the existing boundary condition and consideration should be given to views expressed during public consultation which supported retention.
p72, EP E8	a) The majority of buildings across the estate should not extend higher than 2-4 storeys to contribute to achieving consistency with the surrounding character. b) A number of taller buildings are considered appropriate in landscape and townscape terms and to facilitate intensified use of the site. The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of this vegetation. c) When viewed from outside the estate, taller buildings should not be seen to dominate the landscape or skyline.	Insert before point a) the following: "The Estate is large enough to create its own character with a variety of building heights which should be informed by a detailed character analysis, with consideration given to the below a) The majority of buildings across the estate should not extend higher than could range from 2 –4-6 storeys to contribute to achieving consistency with the surrounding character. b) A number of taller buildings are considered appropriate in landscape and townscape terms and to facilitate intensified use of the site. The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of this vegetation. c) When viewed from outside the estate, taller buildings should not be seen to dominate the landscape or skyline.	The NPPF supports proposals which raise the standard of design more generally in an area and this should be recognised. The London Plan Policy 3.7 also supports a plan-led process should encourage the creation of neighbourhoods with a <i>'distinct character'</i> . Furthermore, London Plan Policy 7.6 requires that buildings should have regard to (not necessarily be consistent with) the scale, mass and orientation of surrounding buildings. As such it is considered appropriate that development proposals should have regard to surrounding buildings; however it is also appropriate for taller buildings to be provided where justified by robust character and townscape analysis.
72, EP E8	b) The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of the vegetation	b) The exact storey heights should be informed by the existing mature trees within and surrounding the estate and should complement, rather than compete with the scale of the vegetation be informed by a detailed character and townscape visual impact analysis, including impact on local views.	The London Plan Policy 7.4 states that <i>'Development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings'</i> . Policy 7.4 requires development proposals to contribute to a positive relationship between the urban structure and natural landscape, but not that building heights should be determined by existing trees. It is therefore inappropriate that building heights should be determined on existing tree height. Furthermore, CHMP has undertaken an assessment of the impact of restricting buildings to existing tree heights and it would have a significant impact on the delivery of a higher density scheme as required by other policies in the Estates Local Plan.
72 3.90	The existing estate has a consistently uniform height of three storey buildings with flat roofs, that gives the estate its distinctive character. This presents something of a fortress feel from the outside, but a strong sense of calm enclosure from the inside. This height and isolated location mean the estate is not a dominant form in the wider townscape.	The existing estate has a consistently uniform height of three storey buildings with flat roofs, that gives the estate its distinctive character; however the estate is large enough to create its own character with varied building heights. This existing layout presents something of a fortress feel from the outside, but a strong sense of calm enclosure from the inside. This height and isolated location mean the estate is not a dominant form in the wider townscape.	As above.
72 3.91	Development proposals will need to demonstrate careful consideration of proposed building heights in relation to internal open space and views into the estate from the wider area, across the cemetery and any other longer vantage points. A clear strategy on building heights will be needed to ensure the suburban character of the area is not unduly compromised.	Development proposals will need to demonstrate careful consideration of proposed building heights in relation to internal open space and views into the estate from the wider area, across the cemetery and any other longer vantage points. A clear strategy on building heights will be needed to ensure the suburban character of the area is not unduly compromised.	It is not considered appropriate to describe the site as suburban given this is a large site that can create its own character whilst integrating with the surrounding area.
HIGH PATH			
76, 3.92	High Path falls within South Wimbledon/Colliers Wood Intensification Area, where the London Plan encourages optimisation of residential densities.	Include reference to Intensification Area throughout the development where relevant. High Path is identified as being within the South Wimbledon / Colliers Wood Intensification Area as defined at Map 2.4 and Policy 2.13 of The London Plan (2015).	Page 79 of the London Plan provides a list of Opportunity and Intensification Areas. South Wimbledon / Colliers Wood (Number 44 on this list) is highlighted as being an Area of Intensification. High Path is within the Area of Intensification. Policy 2.13 of the London Plan provides the policy framework behind Intensification Areas which includes the requirement to <i>'provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential in terms of Annex 1, recognising that there are different models for carrying these forward'</i> . Annex 1 in regards to the South Wimbledon/Colliers Wood Intensification Area states that the <i>'location contains a range of major opportunities for intensification including South Wimbledon and Colliers Wood'</i> with a minimum number of new homes set at 1,300. Policy 2.13 goes on to state that development proposals should <i>'contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1...'</i>
86, 3.118	Public transport links are excellent with the area having a PTAL Level of 5.	Public transport links are excellent with the area having a PTAL Level rating of 5. Improvement works will result in a PTAL rating of 5-6a by 2021.	Housing SPG Policy 3.15 highlights that Boroughs should combine both the short and medium term vision with long term policies and should therefore take account of the proposed improvement works to public transport.
Page 88, 3.120	Commercial buildings along Merton High Street may seem a bit higher than 3 storeys due to their generous ceiling heights' This is probably the most appropriate location for taller buildings in the area	Commercial buildings along Merton High Street may seem a bit higher than 3 storeys due to their generous ceiling heights. There is a mixture of 3 and 4 storey buildings along Merton High Street. Some of the 3 storey buildings appear slightly higher than 3 storeys due to generous ceiling heights and extended parapets This is probably the most appropriate location for taller buildings in the area	Accuracy on the description of heights is required.
p90	The Key refers to 'Incidental green space'	The Key refers to 'Incidental green space' 'Leftover spaces'	These leftover spaces have no merit and therefore it is not considered appropriate to describe them as incidental green space

98, Opportunities	The Council's aspiration is to improve the public realm on Morden Road and Merantun Way by creating a better balance between vehicles and pedestrians. Specific improvements that could be made are simplifying the junction of High Path, The Path and Morden Road and creating an attractive entrance and enabling views to Merton Abbey Mills. Future links to the south of Merantun Way should be planned for as well as east-west quiet-ways for cyclists and pedestrians.	The Council's aspiration is to improve the public realm on Morden Road and Merantun Way by creating a better balance between vehicles and pedestrians. Specific improvements that could be made are simplifying the junction of High Path, The Path and Morden Road and creating an attractive entrance and enabling views to Merton Abbey Mills. Future links to the south of Merantun Way should be planned for as well as east-west quiet-ways for cyclists and pedestrians, subject to the findings of utilities and transport surveys.	The DPD needs to reflect the status of the Estates as 'large sites' (as reflected in national policy) which resultantly can define their own setting. In particular, Housing SPG 1.3.35 states that 'Typically, sites over two hectares usually have the potential to define their own setting', and therefore their scale means they have particular potential to define their own characteristics and accommodate higher density development. CHMP has undertaken a number of technical surveys on existing utilities and as such it should be noted that these must be taken into account in developing highways and public realm improvements.
Page 100, Policy EP H1 c)	Streets should be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove Road	Streets should be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove Road	Planning Policy Guidance on Design notes that 'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities'. There are design and existing utilities constraints which will impact on the ability to provide a straight street through the site. This is however considered to be an appropriate design response, as staggered streets create character and can reduce vehicular speeding.
Page 100, Policy EP H1 d)	The key 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 the junction of High Path and Morden Road and the junction of Abbey Road and Merantun Way	The key 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 the junction of High Path and Morden Road and the junction of Abbey Road and Merantun Way. Landmark buildings can also be delivered within the estate, where this can be justified in townscape and visual impact terms.	This policy wording only considers place-making on the periphery of the estate and does not consider place-making through the use of landmark buildings within the estate. Landmark buildings should also be considered within the estate and not limited to the periphery. As the site is defined as a large site in accordance with the London Plan and Housing SPG it is of size that it can create its own character.
Page 101	Diagram	If the diagram is retained it should be updated as follows and taking account of the comments above: Move building line back along western edge of the High Street; the straight line view along entire east-west link is not possible if existing roads and utilities are to remain/be enhanced; and potential for landmark buildings within the site.	Building lines on western part of Merton High Street do not take into account of the existing Category A London Plane trees.
Page 102, Policy EP H2 a)	Nelson Grove Road and Pincott Road, provide appropriate basis for the design of the new street network and should 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.	Nelson Grove Road and Pincott Road, provide appropriate basis for the design of the new street network and should 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 towards Morden Road, will help provide a safe cycle and pedestrian link across the estate.	Planning Policy Guidance on Design notes that 'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities'. Removing High Path junction and providing a junction from Nelson Grove Road onto Morden Road may have traffic impact and movement issues, including being too close to the Merton High Street signalised junction. It would require all traffic to instead route through the masterplan site, including school drop-off pick-up vehicle trips. Highways proposals will therefore be developed through consultation with the relevant highways authorities.
Page 102, 3.149	North-south streets between Pincott Road and Abbey Road, linking Merton High Street and Nelson Grove Road. These new streets would help connect the new neighbourhood effectively with the existing grid pattern layout and also ensure efficient block pattern layout.	North-south streets (not necessarily vehicular through routes) between Pincott Road and Abbey Road, linking Merton High Street and Nelson Grove Road. These new streets would help connect the new neighbourhood effectively with the existing grid pattern layout and also ensure efficient block pattern layout.	The provision of vehicular access will depend on traffic flows and traffic modelling which would be assessed through a Transport Assessment. As such it should be made specific that through routes could be for pedestrians only. Reference should also be made to the viability of this proposal. The NPPF Para 173 states that 'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. Therefore, it should be noted that the inclusion of pedestrian access would lead to the loss of around 18 homes. Concern is also raised in regards to the safety of the proposed back entrance to Merton High Street and how this would work with the proposed plans for the new tram. London plan Policy 7.3 states that 'Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being over bearing or intimidating'. Consequently, concern is raised in regards to a lack of frontage without train station improvements which could create an unsafe space.
p102, 3.150	Layouts should be designed to allow for pedestrian access...	Consideration should be given to futureproofing layouts to should be designed to allow for pedestrian access having regard to placemaking considerations...	This policy requires greater flexibility and is considered to be too prescriptive, contrary to the NPPF (Para 59) which states that 'design policies should avoid unnecessary prescription or detail'. The proposals should develop through the design-led masterplanning process.
p102,3.152	Whilst Rodney Place, is outside the estate boundary, linking it into the street pattern of the estate would help improve links within the area and make it easier to get around.	Whilst Rodney Place is outside the estate boundary, linking it into the street pattern of the estate should be explored as this could would help improve links within the area and make it easier to get around.	This is not currently part of the Estates regeneration proposals and should be more flexible in allowing this to be explored further.
Page 103	Diagram	If the diagram is to be retained, it should reflect the comments made above and be amended as follows: horizontal orange line 'Nelson Grove Road (required historic street alignments)' should be amended and the blue arrow indicating potential access along Morden Road should be specified as a potential access and not necessarily for vehicles.	Planning Policy Guidance on Design notes that 'Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities'. If the historic line of Nelson Grove Road is retained to the western side of the estate there may be costly and unnecessary diversions of major utilities underneath Rowland Way. The NPPF Para 173 states that 'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking. Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. As such flexibility should be retained for the highways and access strategy for the site.
104 3.157	Off-street parking should preferably be provided instead of undercrofts at basement level, rather than ground level parking with communal garden podiums above.	Off-street parking should preferably be provided instead of undercrofts at basement level, rather than ground level parking with communal garden podiums above. Where off-street parking is proposed detailed design consideration should be given to the impact on street frontages, landscaping and quality of residential accommodation.	It is appropriate for flexibility to be provided in the design of off-street parking to allow this to develop through a design-led approach informed by highways and urban design analysis.
p104, 3.160	From the south the main access point at the junction of Station Road and Merantun Way, where traffic movement is restricted to left in and left out only.	From the south the main access point at the junction of High Path and Merantun Way, where traffic movements are left and right into High Path, but restricted to left out only from High Path.	Currently you can turn right from Merantun Way into High Path and this should be updated for accuracy.

p105, 3.165	Although parking is restricted along High Path Road, localised congestion frequently occurs during school peak times. To improve cycle access it may prove necessary to further restrict vehicle movements by closing the western end of High Path to vehicle traffic, although careful consideration of the impacts on the school and alternative traffic routes will need to be fully understood. How any changes interact with outline plans for the South Wimbledon Tram extension will also need to be identified.	Although parking is restricted along High Path Road, localised congestion frequently occurs during school peak times. To improve cycle access it may prove necessary to further restrict vehicle movements by closing the western end of High Path to vehicle traffic, although careful consideration of the highway impacts , impacts on the school and alternative traffic routes will need to be fully understood. How any changes interact with outline plans for the South Wimbledon Tram extension will also need to be identified.	Highways impacts of the regeneration proposals will be considered at the outline planning application stage and will be assessed by a Transport Assessment. As such this should be specified in the policy as being integral to considering whether restricting vehicle movements would be appropriate.
p105, 3.169	For off-street facilities the preference for parking to be provided in full undercrofts at basement level avoids the creation of residential units with windows only located on one side of the building (single aspect) at ground level that are difficult to design well internally and restrict the type of residential units that are possible.	For off-street facilities the preference for parking to be provided in full undercrofts at basement level avoids the creation of residential units with windows only located on one side of the building (single aspect) at ground level that are difficult to design well internally and restrict the type of residential units that are possible.	It is appropriate for flexibility to be provided in the design of off-street parking to allow this to develop through a design-led approach informed by highways and urban design analysis.
p106	Diagram	If the diagram is to be retained, arrow along Nelson Grove Road showing vehicular route connecting to Morden Road should be removed.	Considering the points above this should be removed as it may not be technically possible and could have significant highways implications which would be contrary to para.32 of the NPPF which requires development proposals not to have a severe impact on highways.
p108, EP H4	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. b) Development proposals must make more efficient use of the land by building in accordance with the London Plan density matrix that are higher than current and improving the urban design quality of the estate. c) In general, the residential density should be higher in the north-west corner of the site, gradually reducing towards the south-east, where the public transport accessibility (PTAL) is lower and there are smaller scale developments (e.g. Rodney Place) or more local streets (e.g. High Path).	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. b) Development proposals must make more efficient use of the land by building in accordance with having regard to the London Plan density matrix which indicates that densities higher than existing are acceptable. Development proposals should improve are higher than current and improving the urban design quality of the estate. c) In general, the residential density should be higher in the north-west corner of the site, gradually reducing towards the south-east, where the public transport accessibility (PTAL) is lower and there are smaller scale developments (e.g. Rodney Place) or more local streets (e.g. High Path).	The DPD needs to reflect the status of the Estates as 'large sites' (as reflected in national policy) which resultantly can define their own setting. In particular, Housing SPG 1.3.35 states that 'Typically, sites over two hectares usually have the potential to define their own setting', and therefore their scale means they are able to define their own characteristics and accommodate higher density development. London Plan Policy 3.7 also supports the addition of non-residential uses on large sites.
108, 3.173	High Path and the surrounding area are predominately residential. High Path is located within an area with a good level of Public Transport Accessibility (PTAL). In accordance with the London Plan density matrix, regeneration offers opportunities to make more efficient use of the land with higher density development. Applying this matrix indicates and taking account of the existing number of homes, indicates a range of 608 - 1,802 (gross figure) new homes for this site and the council's expectation is for development proposals to be at the higher end of this range.	High Path and the surrounding area are predominately residential. High Path is located within an urban area with a good level of Public Transport Accessibility (PTAL). In accordance with the London Plan density matrix, regeneration offers opportunities to make more efficient use of the land with higher density development. Applying this matrix indicates and taking account of the existing number of homes, indicates a range of 608 - 1,802 (gross figure) new homes for this site and the council's expectation is for development proposals to be at the higher end of this range. This density range should not be applied mechanically and a design-led approach should be taken.	Optimising the potential of land and housing output is not referenced as a Design Principle and it should be included in this section. The DPD should also reflect the position that the Estates are 'large sites' and therefore that they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'. Furthermore, the Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'.
109, 3.175	Subject to meeting the Local Plan policies, provision of such uses (e.g. retail shops, financial and professional services, cafes/restaurants, replacement of public houses, community, health, leisure and entertainment uses)	Subject to meeting the Local Plan policies, provision of such uses (e.g. retail shops, financial and professional services, cafes/restaurants, replacement of public houses, offices , community, health, leisure and entertainment uses)	Offices could be an appropriate non-residential use on large sites in accordance with London Plan Policy 3.7.
Page 113	Diagram	If the diagram is to be retained reference to retained trees informing the design of open spaces should be removed.	CHMP has undertaken arboricultural surveys which indicates that some of the mature trees highlighted are not of value and should therefore not necessarily be a basis for the location of open spaces. The location of open spaces should be based on a detailed urban design analysis.
p114, Policy 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 are to form the basis of new open spaces and a network of biodiversity enhancing green corridors across the estate.	the retention of Retention of the existing mature tree groups of value and street trees of value including the trees fronting Merton High Street east of the junction with Pincott Rd are to form the basis of new open spaces and a network of biodiversity enhancing green corridors across the estate unless justified by a detailed design analysis and arboricultural survey.	Where possible existing trees will be retained on site; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible.
p114, Policy E	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible...	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates....	The proposed amended wording should be consistent with London Plan Policy 5.13.
p114, P3.185	Reference to culverted watercourse across estate	Reference to culverted watercourse across estate	CHMP have undertaken physical surveys of the site which do not show the presence of this culverted ditch. If this reference is to be included please provide the evidence base for the existence of the ditch.
Page 116	Diagram	If the diagram is to be retained remove reference to mature trees informing the design of open spaces	CHMP has undertaken arboricultural surveys which indicates that some of the mature trees highlighted are not of value and should therefore not necessarily be a basis for the location of open spaces. The location of open spaces should be based on a detailed urban design analysis.
118, EP H7 Landscape	a) Retention of: i) the existing mature tree groups and street trees including the trees fronting Merton High Street east of the junction with Pincott Road; ii) the tree planting along Hayward Close should be continued along the whole length of the street to strengthen the attractive 'avenue' character of this street; iii) the mature tree(s) in the vicinity of the playground within the 'Priory Close' block; iv) the line of mature trees in the car park between the 'Ryder House' and Hudson Court' blocks; 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.	a) Where justified by arboricultural surveys and urban design analysis , retention of: i) the existing mature tree groups (if of value) and street trees (if of value) including the trees fronting Merton High Street east and west of the junction with Pincott Road; ii) the trees (if of value) planting along Hayward Close should be continued along the whole length of the street to strengthen the attractive 'avenue' character of this street; iii) the mature tree(s) (if of value) in the vicinity of the playground within the 'Priory Close' block; iv) the line of mature trees (if of value) in the car park between the 'Ryder House' and Hudson Court' blocks; v) the mature trees (if of value) in the playground to the north of the 'Marsh Court' block. vi) the mature trees (if of value) to the west and south of the 'Merton Place' block, and to the north of the 'DeBurgh House' block.	Where possible existing trees will be retained on site; however retention will be based on a robust arboricultural and urban design analysis. Further, arboricultural surveys have been undertaken which assess the value of existing trees on the site. In accordance with Policy 7.21 of the London Plan, existing trees of value will be retained where possible.

120, EP H8 Building Heights	<p>a) The general building height across the site should be 5-6 storeys with variations (outlined below) in order to create a consistent height profile and street character that visually links with the surroundings.</p> <p>b) Buildings fronting Merton High Street will be restricted to 4 storeys (with potential for a 5th storey setback) to ensure the environmental quality of the street does not unduly suffer from shading and blocking of sunlight.</p> <p>c) Buildings fronting Morden Road should be 7-9 storeys to be similar to the existing and potential building heights on its west side and ensure a consistent and even street character.</p> <p>d) Buildings on the west side of Abbey Road should be up to 4 storeys to relate well to the existing housing on the east side and newer flats on the west side.</p> <p>e) Building heights along High Path should be 3-4 storeys in height to 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) Land outside the estate boundary fronting Merantun Way is suitable for buildings of 7-9 storeys to promote the transformation of this road into a boulevard street.</p> <p>g) 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 and make the most of the potential for taller buildings fronting Merantun Way. Storey heights in this general area should rise from 3-4 storeys to 5-6 storeys.</p>	<p>The estate is located in an area of intensification and is large enough to create its own character with varied building heights including potentially tall buildings having regard to the considerations below.</p> <p>a) The general building height across within the site should shall be informed by a detailed design analysis having regard to street character, legibility and views. be 5-6 storeys with variations (outlined below) in order to create a consistent height profile and street character that visually links with the surroundings.</p> <p>b) Buildings fronting Merton High Street should be 3 - 6 storeys having regard to the surrounding local character and will be restricted to 4 storeys (with potential for a 5th storey setback) to ensure the environmental quality of the street to ensure it does not unduly suffer from shading and blocking of sunlight. Set backs could be utilised to ensure an appropriate relationship with the surrounding area.</p> <p>c) Buildings fronting Morden Road should be 7-9 storeys to be similar to the existing and potential building heights on its west side and ensure a consistent and even street character.</p> <p>d) Buildings on the west side of Abbey Road should be up to 4 storeys to relate well to the existing housing on the east side and newer flats on the west side.</p> <p>e) Building heights along High Path should ensure no unacceptable harm to be 3-4 storeys in height to 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) Land outside the estate boundary fronting Merantun Way is suitable for buildings of 7-9 storeys to promote the transformation of this road into a boulevard street.</p> <p>g) 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 and make the most of the potential for taller buildings fronting Merantun Way. Storey heights in this general area should rise from 3-4 storeys to 5-6 storeys. could be from 3 to 7 storeys having regard to detailed character and townscape analysis.</p>	<p>In order to meet the higher end of the density range specified, greater flexibility is required to support the development of scheme that provides buildings of varying heights justified on townscape, visual and amenity terms. The site is considered to be a large site and can therefore form its own character in line with London Plan Policy 3.7.</p> <p>London Plan Policy 7.7 notes that '<i>Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.</i>' The Estate is not within a sensitive area and consequently, subject to adequate assessments, heights along the street could be increased to generate the stimulus for redevelopment of the land to the south of High Path, adjacent to Merantun Way.</p>
p120, 3.199	Building heights along the lengths of streets should be similar or the same on either side in order to maintain a consistent character.	Building heights along the lengths of streets should be similar or the same on either side in order to maintain a consistent character.	<p>Opportunities to create and retain character of an area should be taken in line with NPPF Para 60 which states that '<i>Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.</i>'</p> <p>Consequently, this policy is too prescriptive and no transition in height would ever occur if the same height was to be provided on either side of a street. The site is large enough to create its own character in accordance with Policy 3.7.</p>
p120, 3.200	A more even distribution of heights will reduce these negative characteristics and help new development fit in comfortably with its surroundings. It will also create neighbourhood streets that are easy to get around. In order to fit well with the surroundings, it is important to ensure building heights on the edge of the estate relate appropriately to those adjacent to it.	A more even appropriate distribution of heights will reduce these negative characteristics and help new development fit in comfortably with its surroundings. It will also create neighbourhood streets that are easy to get around. In order to fit well with the surroundings, it is important to ensure building heights on the edge of the estate relate appropriately to those adjacent to it.	The policy needs to be flexible to allow a design led approach to building heights, informed by detailed urban design and townscape analysis.
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p 124, 3.201area of approximately 4.5 hectares.area of approximately 4.5 hectares. It is therefore large enough to create its own character.	As per the Housing SPG it should be recognised that this is a large site which should 'create neighbourhoods with distinctive character'.
p.126-128		Due to the structure of the section it is unclear about the historical development of the site. The narrative jumps from 1800s, to 1930s, 1970 and then 1950. It would help if some re-ordering of the paragraphs was undertaken.	For clarity.
p.127, 3.208	Maps from the 1950s show a branch of the River running alongside Morden Road, which is clearly responsible for the set-back of the houses from the main road.	Maps from the 1950s show a branch of the River one of the man-made watercourses running alongside Morden Road which is clearly responsible for the set-back of the houses from the main road with earlier maps from the 1930s showing watercourses running east to west through the site.	There has been much emphasis placed on this one section of the many man-made watercourses that were created as part of the mill. The focus should not be placed singularly on this element as it is no more significant than all the other historic watercourses that were created on the site. It is therefore appropriate to make reference to all historic watercourses.
p.130	Image Plan	Ravensbury Estate (number 1 in the key) has included both Ravensbury Mill and the buildings on the opposite side of Morden Road. These should be removed from the estate area and included in the Ravensbury Park and Morden Hall Park areas respectively.	The character of the estate in both building type, street layout and defined building edge along Morden Road means that it is a separate character area that has a relationship to, but is not the same character as the adjacent buildings.
133, 3.223	Within the Estate the PTAL is 1B	Within the Estate the PTAL is 1B. Improvements will result in a PTAL rating of 2-3 by 2021.	Housing SPG Policy 3.15 highlights that Boroughs should combine both the short and medium term vision with long term policies and it is therefore appropriate to take account of the proposed transport improvement works.
P.134	Diagram	There are some Orlit houses along Ravensbury Grove which were built at the same time as the rest of the houses in Orange. There is photographic and mapped evidence that the two rows of original terraced houses on the estate were still standing when the Orlit houses were built and the plan should therefore be updated.	This should be updated for clarity and consistency. Please see attached plan as Attachment 3.
136, 3.225	At four storeys Ravensbury Court both reflects the scale of the mature trees and spaces surrounding it...	At four storeys Ravensbury Court both reflects the scale of the mature trees and spaces surrounding it....	It is not considered appropriate to refer to buildings reflecting the scale of trees.
136, Diagram		Communal amenity space should be shown behind the block of flats at the bottom of Ravensbury Grove Road.	For accuracy and clarity as this is existing space.
137, 3.226	Most of the space is well defined and its use and purpose clear, with little space being 'left over' or ambiguous.	Most of the space is well defined and its use and purpose clear, with little however some of the space is being 'left over' or and ambiguous, for example, at the end of Ravensbury Grove.	Should be recognised that some of the existing space is 'left over'.
142, 3.229	The landscape of the estate is defined by the surrounding mature trees of Morden Hall Park and Ravensbury Park and the riparian landscape of the River Wandle. This gives the estate its secluded, almost rural feel and is an essential part of its character.	The landscape of the estate is defined influenced by the surrounding mature trees of Morden Hall Park and Ravensbury Park and the riparian landscape of the River Wandle. This gives the estate its secluded, almost rural feel and is an essential part of its character.	The landscape is influenced by the surrounding area but not defined by it. This is a suburban area not 'almost rural' and as such the reference should be removed.
p143, 3.230	A footbridge across the river to an existing access onto Wandle Road would increase the accessibility of the area for residents of the estate and local area significantly.	A footbridge across the river to an existing access onto Wandle Road would increase the accessibility of the area for residents of the estate and local area significantly.	This is not considered to be an issue associated with the existing estate but rather a potential solution that may need to be explored further through the development of the regeneration proposals.

p144		Insert opportunity on housing optimisation and development density	Optimising the potential of land and housing output is not referenced as an opportunity and it should be included in this section. The opportunity should also reflect the position that the Estates are 'large sites' and therefore they have the potential to accommodate higher densities as set out in Policy 3.7 of the London Plan. Merton's Core Strategy Strategic Objective 3 (Page 34) equally reflects the need for higher density developments stating that to achieve the target of providing new homes and infrastructure the council will deliver 'higher density new homes'.
p143, 3.236	Where possible, flood risk should be reduced without undermining the landscape character or semi-rural feel of the area.	Where possible, flood risk should be reduced without undermining the landscape character or semi-rural feel of the area.	This is a suburban area not 'semi rural' and as such the reference should be removed.
146, 3.244 and 246	Proposals should investigate working in conjunction with the National Trust to consider the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road. Proposals could investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.	Proposals should investigate working in conjunction with the National Trust to consider the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road. Proposals could investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.	These paragraphs should be removed. The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of a infrastructure, as such infrastructure is not only for the benefit for the Estate, nor is the provision a site specific mitigation requirement.
p.146, EP R1 - 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.	The corner of the estate with Morden Road adjacent to Ravensbury Park will be expected to make an architectural statement which sensitively addresses take account of the park entrance, river and mill buildings.	Clarity in text over area the policy refers to.
150, Policy EP R2	B. Ravensbury Grove should be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.	B. Ravensbury Grove, through landscaping , should be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.	Detailed analysis has identified that it is not feasible to extend the actual road to the boundary with the Park; however landscaping measures can be incorporated to provide clear views along the length.
p.150 Policy EP R2	C. Hengelo Gardens should be retained and enhanced, particularly with respect to arrangement of car parking, general landscaping and the potential for flood attenuation measures.	C. Hengelo Gardens should be retained and enhanced, particularly with respect to arrangement of car parking, general landscaping and the potential for flood attenuation measures unless justified through detailed urban design analysis.	The DPD should refrain from being overly prescriptive. Paragraph 59 of the NPPF states that ' <i>design policies should avoid unnecessary prescription or detail</i> '. This is reiterated within the Design PPG which provides guidance on creating 'successful places'. The Design PPG notes that ' <i>successful places can adapt to changing circumstances and demands. They are flexible and able to respond to future needs</i> '. It is therefore considered to be appropriate to allow flexibility in relation to potential parking, landscaping and flood attenuation requirements. that will de developed through detailed design analysis and technical surveys.
p152, 3.269	There is scope to improve this crossing through enhancements to footways and crossing point which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment.	There is scope to improve this crossing through enhancements to footways and crossing point which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment. The Council will investigate the potential of CIL funding being used for the delivery of any potential off-site enhancements.	The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of such infrastructure as it is not only for the benefit for the Estate, nor is the provision a site specific mitigation requirement.
p152, 3.262 and 263	To enhance pedestrian links there is also opportunity to build a new bridge to Ravensbury Park, creating a new North-South pedestrian link from Wandie Road to the Ravensbury Estate. Within Ravensbury Park there is potential to add additional bridges/walkways across the river and back channel which would allow for a better connection between the Ravensbury Estate and the play area in Ravensbury Park.	To enhance pedestrian links there is also opportunity to build a new bridge to Ravensbury Park, creating a new North-South pedestrian link from Wandie Road to the Ravensbury Estate. Within Ravensbury Park there is potential to add additional bridges/walkways across the river and back channel which would allow for a better connection between the Ravensbury Estate and the play area in Ravensbury Park. The Council will investigate the potential of CIL funding being used for the delivery of any potential off-site enhancements.	The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of such infrastructure as it is not only for the benefit for the Estate, nor is the provision a site specific mitigation requirement.
p.154 and 155	Diagram	If the diagram is to be retained the northern connection to Morden Road should be removed.	PPG on Design notes that PPG Design ' <i>Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through</i> '. Creating too many links through the site does not always create a well connected plan that integrates with the neighbourhood if the link does not go anywhere. The northern connection is considered to divide the plan further creating more roads than developable area. There becomes in effect more roads and footpaths than area to be developed for residential use which is not considered to optimise the housing potential of the site. The connection to the tram link would be better served from the end of Ravensbury Grove due to the need to cross Morden Road to access the footpath north of the site. Public consultation also confirmed that residents were not supportive of creating a link through the site and as per the NPPF, planning policy should be informed by public consultation comments.
156, 3.273	Ravensbury is located within an area with a low level of Public Transport Accessibility. Taking account of these factors, and application of the London Plan matrix a range of 106 - 288 (gross figure which excludes land occupied by housing to be retained or refurbished) new homes are anticipated on this site. The council's expectation is for development proposals to be at the higher end of this range.	Ravensbury is located within an area with a low level of Public Transport Accessibility. Taking account of these factors, and application of the London Plan matrix a range of 106 - 288 (gross figure which excludes land occupied by housing to be retained or refurbished) new homes are anticipated on this site. The council's expectation is for development proposals to be at the higher end of this range. This density range should not be applied mechanically and a design led approach should be taken.	The Housing SPG Para 1.3.7 notes that 'The London Plan is clear that the SRQ density matrix should not be applied mechanically, without being qualified by consideration of other factors and planning policy requirements'.
157	Diagram	This diagram is not considered relevant and should be removed.	The land use is to be predominantly residential as existing and therefore the diagram is not considered to be relevant or helpful.
158, EP R5 Open Space	D. All new houses and flats should have gardens and amenity space to meet or exceed current space standards	Delete this reference.	This replicates Merton Development Management Policies and as such is not necessary to repeat in the Estates Local Plan.
p160, Policy C	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible...	The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates....	The proposed amended wording should be consistent with London Plan Policy 5.13.
p.161, 3.288	Reinstatement of a historic river channel running along side Morden Road....	Reinstatement of a Reference should be made in the landscape design to the historic river channel running along side Morden Road, for example through the provision of a dry swale....	This is too prescriptive and does not have regard to viability contrary to the NPPF, particularly para 174. Furthermore, a landscape link does not have to be created through the reinstatement of the watercourse but could be through other measures. It is not considered appropriate in both flood mitigation and safety terms to reinstate the open watercourse. The historic watercourse could however be referenced in the landscape design, for example, through the provision of a dry swale that would create a green buffer and provide additional flood mitigation measures.
p.162	Diagram	Should the diagram be retained, the northern strip of 'illustrative swale' is not an appropriate location for this due to depth of space between road and houses and the location of existing trees. This could however be provided as permeable paving. The Key and plan should be updated to show this and to confirm that flood mitigation measures should not be limited to swales.	Flood mitigation measures should not be limited to swales and other approaches should be included. Flood mitigation measures will be subject to significant technical assessment.

p166, Policy EP R8	<p>a) Buildings heights should not compete with established mature trees which envelope the estate and should not harm the visual amenities from within the adjacent parks.</p> <p>b) Within the development a building height range of 2-4 storeys should not adversely affect views to the surrounding established trees. Relatively open views from within the estate to the surrounding tree canopy are a defining characteristic of the estate and should generally be retained.</p>	<p>a) The site is large enough to create its own character with varied heights. Building heights should be informed by a detailed character analysis not compete with complement established mature trees which envelope the estate and should not harm the visual amenities from within the adjacent parks.</p> <p>b) Within the development a building height range across the site of generally 2-4 storeys should not adversely affect views to the surrounding established trees. Taller buildings up to 5 storeys may be appropriate at focal points.</p>	<p>In order to meet the higher end of the density range specified, greater flexibility is required to support the development of scheme that provides buildings of varying heights justified on townscape, visual and amenity terms. The site is considered to be a large site and can therefore form its own character in line with London Plan Policy 3.7 and the Housing SPG.</p> <p>Building heights should be informed by an understanding of the site and surrounding area and developed through a design-led approach. Detailed urban design, townscape and amenity analysis will inform appropriate building heights for the Estate, and therefore the policy should refrain on being overly prescriptive on building heights.</p>
166, 3.297	New development comprising mainly of houses rather than flats is more likely to preserve the landscape character of the estate.	Housing typologies should New development comprising mainly of houses rather than flats is more likely to preserve the landscape character of the estate.	<p>NPPF Para 14 states 'Local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change' and goes on to note at Para 47 that Authorities should 'use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...'</p> <p>Therefore, housing types should be driven by housing need and viability as identified in the Housing Needs Assessment. Additionally, it should be acknowledged that flatted blocks and maisonettes can be appropriately designed to preserve landscape character.</p>
166	Diagram	Remove diagram	This is considered unnecessary and should therefore be removed.
166, 3.301	The next chapter outlines the requirements applicants will need to meet in their submission of planning applications. This entails a set of detailed design codes, developed by the applicant, in accordance with the Plan.	The next chapter outlines the requirements applicants will need to meet in their submission of planning applications. This entails a set of detailed design codes, developed by the applicant, in accordance with the Plan.	Delete paragraph as this is not the appropriate place for this within the DPD.
DESIGN CODE			
171, 4.1	This part of the Plan requires the applicant to submit their own design codes for any development proposals.	This part of the Plan requires the applicant to submit their own design codes for any development proposals. provides guidance on any design codes that may be required to support development proposals.	The need for a design code should be determined through pre-application discussions rather than the DPD.
171, 4.2	At the planning application stage, the applicant, will be expected to include as part of their application, a set of design codes that guides the development of each phase of the redevelopment. This should include, but not necessarily be limited to, a number of specific subject areas outlined below. The following guidance lists the subject areas that must be covered and gives guidance on how these subjects will be expected to be addressed.	At the planning application stage, the Council will discuss with the applicant whether it is necessary to submit a design code. This will be dependent on the type of application and level of detail being submitted. will be expected to include as part of their application, a set of design codes that guides the development of each phase of the redevelopment. If required this could should include, but not necessarily be limited to, a number of specific subject areas outlined below. The following design principles lists the subject areas that must may need to be covered: and gives guidance on how these subjects could will be expected to be addressed. architecture and elevations, materials, landscape and biodiversity, flooding and drainage, internal space standards, building and dwelling layouts, building to street interface, street design characteristics, amenity space and refuse storage and collection.	The NPPF paragraph 59 states that "Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail..." Furthermore the Design PPG requires that "...design codes should wherever possible avoid overly prescriptive detail and encourage sense of place and variety". The proposed design code within DPD enforces unnecessary prescription and detail and its removal is therefore considered appropriate. The need for a design code should be determined through pre-application discussions for the outline planning applications. Furthermore, conditions could be attached to any planning permission to require compliance with certain standards, for example internal space standards, and therefore secure design quality.
p170 to 171 4.3 to 4.15		Delete Design Codes onwards	As above.
174, 5.1	Should regeneration of Merton's three estates go ahead, this currently...	Should regeneration of any of Merton's three estates go ahead, this currently...	There could be a scenario where one or two estates come forward. The same policy basis could be applied to one, two or three estate regenerations.
174, 5.4	CHMP have committed to an open book accounting process to facilitate the understanding of the impact on residents on council services.	CHMP have committed to an open book accounting process to facilitate the understanding of the impact on residents on council services.	Viability information in support of the case for regeneration and future planning applications will be redacted where appropriate due to the inclusion of commercially sensitive information.
174 5.6	Building new homes for existing residents to move into while their home is being built is very important for keeping existing communities together as far as is possible to create the foundations for a sustainable community long-term.	Building new homes for existing residents to move into directly and in a single move (i.e. without the need for a temporary decant) while their home is being built is very important for keeping existing communities together as far as is possible to create the foundations for a sustainable community long-term. It also minimises disruption to existing residents' lives.	It is important to recognise the importance of early delivery housing for the decant of residents.
174	Options for first phase of early housing delivery development on Eastfields	Options for first phase of early housing delivery development on Eastfields	
174, 5.10	It may be possible to build new homes along the boundary of land within St Marks Academy, between Eastfields Estate and Eastfields train station, preserving playing space while providing new homes that create better access between the station and the estate.	It may be possible to build new homes along the boundary of land within St Marks Academy, between Eastfields Estate and Eastfields train station, preserving the appropriate level of playing space while providing new homes that create better access between the station and the estate. This would allow the building of additional new homes which in turn could speed up the overall regeneration of Eastfields. At the same time a number of existing urban design and access issues could be improved with safer pedestrian routes to Micham Eastfields station and new street frontages, while providing new homes that create better access between the station and the estate.	There may be a loss of open space however a detailed exercise to review the quantity and quality of existing provision against need in accordance with paragraph 74 of the NPPF will be undertaken.
176 5.14	Other potential sites were considered and are not recommended to be taken forward.	Other potential sites were considered and are not recommended to be taken forward at this stage.	Housing SPG Policy 3.15 notes that 'Boroughs should ensure that implementation of this Plan's long term, strategic housing policies are informed by, and integrated with, the short to medium term horizon' and hence policy should not restrict further sites coming forward at a later date.
176, 5.15	The council will use section 106 planning obligations and/or CIL to ensure the delivery of key infrastructure and to mitigate impact of development.	The council will use section 106 planning obligations and/or CIL to ensure the delivery of key infrastructure and to mitigate impact of development. The Council will update the CIL Regulation 123 to include the items of infrastructure identified in this DPD.	The Council should update the CIL Regulation 123 list to enable CIL receipts to be used to fund the delivery of items identified in the DPD, as such infrastructure is not only for the benefit of an Estate, nor is the provision a site specific mitigation requirement.

Ann Clake
London Borough of Merton
Policy & Information
Merton Civic Centre London Road
Morden
Surrey
SM4 5DX

Our ref: SL/2006/100135/OT-
06/PO1-L01
Your ref: mnxclPO8DEW
Date: 30 March 2016

Dear Ann

London Borough of Merton Draft Estates Local Plan - Preferred Options

Thank you for consulting us on the Draft Estates Local Plan.

We support the weight given to flood risk management and enhancements for biodiversity within the draft plan.

We have provided detailed comments on the design principles in Section 1 attached on the three estates that make up the Merton Local Plan Area in sections 2-4 below.

We apologise for the delay in our response and hope you find our comments helpful, if you have any questions please contact me.

Yours sincerely

Joe Martyn
Planning Advisor

Direct dial 020 3025 5546
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Section 1: Design principles

2.41 Promoting biodiversity

We welcome the fact that biodiversity is seen as a valuable asset in the borough. This includes the assertion that biodiversity will not be adversely impacted by the regeneration proposals and that opportunities for biodiversity enhancement will be sought, which in turn will benefit the local communities.

Section 2: Eastfields

It is welcomed that Policy EP E6 Environmental Protection, highlights the need to ensure that flood risk is fully considered in line with all relevant policy and should include all possible and applicable SuDS features. In addition, Policy EP E6 also makes reference to the reduction of Greenfield runoff rate to be in line with the content of the Mayor's London Plan.

In Eastfields, one of the opportunities that is highlighted relates to the reconfiguration of open space and opportunities for landscape connectivity are set out. This opportunity should be tied in with the requirement to use SuDS and reduce the rate of surface water runoff, these open areas could offer another opportunity to incorporate SuDS features and act as storage and conveyance areas for surface water runoff. The planting of trees in urban setting are thought to act to take up water and could be part of an overall sustainable solution to drainage for the estate.

We would be supportive of the creation of a linear park to the north eastern side of the estate to incorporate a swale or linear water feature to be facilitated by the de-culverting of the existing historic watercourse that flows underground between the estate and Long Bolstead Recreation Ground.

The removal of a watercourse from a culvert can not only have flood risk management benefits, but also a range of ecological and biodiversity benefits. If the ditch cannot be de-culverted (i.e. if it is still an operational TW sewer), there is a proposal for an offline sustainable drainage feature. These should be designed to benefit biodiversity.

Section 3: High Path

It is welcomed that Policy EP H6 Environmental Protection, highlights the need to ensure that flood risk is fully considered in line with all relevant policy and should include all possible and applicable SuDS features which could include opportunities to enhance the biodiversity value of the area.

In addition, Policy EP H6 also makes reference to the reduction of Greenfield runoff rate to be in line with the content of the Mayor's London Plan, this is also welcomed.

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It is also noted and welcomed that there is specific reference to the use of open spaces to contribute towards the efficient system for the management of surface water runoff through the use of SuDS.

The report has highlighted that High Path is in close proximity to the River Wandle and therefore to areas which are considered to be at risk to fluvial flooding. In addition, the area is considered to be at risk to surface water flooding and is shown as such on the latest version of the surface water flood risk mapping. With this in mind, any opportunity to better manage runoff and flows from this area which would reduce the risk to flooding elsewhere should be encouraged and implemented. Reference is made in section 3.185 to the possible de-culverting of a section of the Bunces Ditch. This should be investigated in more detail as the removal of a watercourse from a culvert can not only have flood risk management benefits, but also a range of ecological and biodiversity benefits/value of the area.

F(i) and (ii) include the potential for a heat recovery system from the River Wandle. Such systems can have implications on the biodiversity of rivers, particularly fish, due to such factors as changes in water temperature and structures in the watercourse. Therefore we would welcome early discussions with all relevant functions of the Environment Agency if this proposal should proceed.

Section 4: Ravensbury

Issues and opportunities

Biodiversity is well covered in this section, with particular reference to the biodiversity value of the River Wandle and we support this recognition.

The Ravensbury Estate is shown as being located within an area considered to be a high risk to fluvial flooding from the adjacent River Wandle. A majority of the estate is shown as being within the 1 in 100 year (1%) flood risk area, with other parts of the estate located within the 1 in 1000 year (0.1%) flood risk area. It is noted that flood risk to the Ravensbury Estate is referenced in section 3.236; this section also acknowledges that any regeneration must take into account this issue to ensure that flood risk is not increased elsewhere. All opportunities should be taken to reduce flood risk to the Estate and at other locations, with the design of any regeneration proposal taking every opportunity to increase resilience and resistance to flooding, as well as reducing flood risk overall. This should include changes to buildings to make them more resilient/resistant to flooding, and opportunities to alter layouts and the provision of open space to assist in managing flood risk should be taken. The proximity of the Estate to Ravensbury Park might also provide opportunities to flood reduction, with open areas being utilised for the storage of flood waters.

The suggestion for the inclusion of SuDS features that will manage surface water and create space for fluvial flood waters is noted, we would strongly encourage innovative thinking along these lines to increase available storage for floodwaters and

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encourage the use of open spaces to convey and hold flood flows. It is welcomed that the reduction in runoff rates, in line with the London Plan, is highlighted. We welcome the proposals in 3.237 (Biodiversity) and 3.238 (Mitigate Flooding) of reducing flood risk and enhancing biodiversity, such as the creation of swales and other wetland habitats.

We particularly welcome the assertion in section 3.243 Biodiversity in Ravensbury Park that there should be a suitable landscape buffer between the river and the proposed development. This has the added benefit of maintaining a wildlife corridor alongside the river.

As stated in Policy EP R6, the River Wandle is a designated main river. The prior consent of the Environment Agency is required under Section 109 Water Resources Act 1991 for any works in, over or under the channel of on the banks within 8 metres of the top of the bank. We fully support the statement that there should be a minimum 8 metres wide buffer zone along the River Wandle and 5m along ordinary watercourses, measured from the top of the bank to the edge of any new development. Such buffer zones allow for maintenance of the watercourses and creates an undeveloped wildlife corridor for animals to move along.

The regeneration of the Ravensbury Estate has the opportunity to include some real measures to reduce flood risk. With this in mind, significant consideration should be given to flood risk throughout the concept and design phases of regeneration, as there is the opportunity to deliver tangible benefits not only to the Estate but also to the wider area. There is also the opportunity to deliver multiple benefits via the regeneration, not only the reduction of flood risk, but also gains in biodiversity, recreation and social benefits for residents.

We support the multi-benefits of SuDS and in particular how a network of swales and other measures will help to create corridors for species to move along and link with adjacent habitats and open space, including the river corridor.

We welcome the potential reinstatement of a historic river channel alongside Morden Road as set out in section 3.281, as long as this does not increase flood risk. Any reinstatement should be designed for maximum biodiversity benefit.

We also welcome the potential to enhance the backwater tributary channel of the River Wandle that runs along the southern boundary of the site as well as in-channel enhancements of the River Wandle itself. We would be interested to see any proposal for enhancements, especially if any enhancements could assist in reducing flood risk and enhancing biodiversity.

We would be happy to advise on such enhancements to ensure biodiversity and geomorphology benefits are maximised without there being an increase in flood risk. This could contribute to the implementation of mitigation measures identified under the Water Framework Directive.

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Flooding and biodiversity are identified as being particularly relevant to the redevelopment of this estate and we support the assertion that these factors are seen in a positive light by giving opportunities to improve flood risk, biodiversity and the landscape. We also support the fact that the proposed swales should not just be designed to attenuate run-off but will also benefit biodiversity.

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GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Tara Butler
Future Merton Team
Merton Council
Merton Civic Centre
London Road
Morden
SW4 5DX

Our ref: LDF24/LDD07/CG01
Date: 15 March 2016

Dear Ms Butler

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Merton – Draft Estates Local Plan – Stage 2 consultation

Thank you for your correspondence of 03 February 2016 consulting the Mayor of London on the Merton draft Estates Local Plan (Stage 2 consultation). As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. These representations include comments from Transport for London (TfL), which I support and are included in this letter. Detailed comments from TfL on each potential redevelopment site are attached in Appendix 1.

The Mayor welcomes Merton's aim to master plan these potential large redevelopment sites through a development plan document (DPD) as recommended by London Plan policy 3.7. This approach will provide certainty to developers and the community, but the proposed policies need to be flexible enough to be implemented over the Plan period. The proposed policies on design, access, open space, and environmental quality are welcome. However, the document provides very limited commentary on the types, nature, and tenure of housing that the Council wants to be re-provided.

Quantum of development

Merton's Core Strategy 2011 sets a minimum housing target of 4,800 over the plan period (2011 - 2026). This equates to 320 additional dwellings a year. After close working with Merton, Table 3.1 of the London Plan 2015 sets the borough an annual housing supply target of 411 a year. Annex 2 of the London Plan 2015 suggests that Merton's housing need figure is at least double this. The indicative need figures set out in the London Plan are broadly equivalent to those set out for Merton in the South West Strategic Housing Market Assessment (SHMA) of 1,120 homes per year.

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 each estate, the document sets out a range for the potential number of new homes based on the density matrix in the London Plan. However, it is unclear what local characteristics the matrix setting was based on. The Council should take note of paragraph 1.3.32 of the Mayor's Supplementary Planning Guidance 2016 which advises that 'setting' should not be defined in a static way in relation to the character of the surrounding area without considering the potential for large sites to define their own characteristics in terms of setting and densities and for new development to be successfully integrated into its immediate context through considerate design. The Council should ensure these sites optimise their contribution to Merton's and London's housing supply in order to meet local and strategic need.

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.

Transport

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: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

Car parking provision should accord with the London Plan maximum standards and cycle parking should accord with London Plan minimum standards.

The plans recognise the need to improve the cycling and pedestrian networks throughout all three estates, and improving links to the surrounding areas to encourage walking and cycling. The Mayor and TfL would encourage regeneration proposals to conform to Policy 6.9 (Cycling) and 6.10 (Walking) of the London Plan.

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.

The Mayor and TfL would encourage the estate street networks to accord with TfL's Street Types guidance.

Wider issues

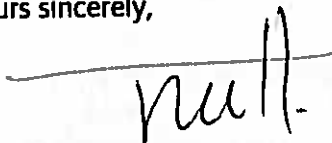
Given the scale, density and likely coordinated delivery of each site, the borough should consider whether there are any specific on-site requirements that could be generated from the potential development, for example, any physical or social infrastructure requirements and for High Path, a reduced car parking requirements, given its proximity to public transport.

Next stages

The Mayor will issue his formal opinion on general conformity when requested at the pre-submission stage. However, I hope that the concerns raised at the current stage can be resolved before then, through continuing informal discussions with Council officers. Please do contact Celeste Giusti (020 7983 4811) to discuss the issues raised in this letter further. In addition, TfL would welcome further discussions with the Council as the regeneration proposals progress. In particular TfL will expect the

development to enter into pre application discussions with TfL in respect of any future development proposal.

Yours sincerely,



S.M. Stewart Murray
Assistant Director – Planning

Cc Richard Tracey, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning and Spatial Development Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL

Appendix 1 - Further detailed comments from Transport for London

Eastfields

- The estate is located in the east of the borough and is located a significant distance from the Transport for London Road Network (TLRN); the closest section of the TLRN is the A24 London Road which is located approximately 2km east of the estate. The closest section of the Strategic Road Network is the A217 London Road located approximately 1km west of the estate. Mitcham Eastfields Rail Station is located approximately 450m west of the estate. The estate therefore has a Public Transport Accessibility Level (PTAL) of 2, on a scale of 1 to 6 where 6 is the most accessible.

High Path

- The estate is located in South Wimbledon. The A24 Merantun Way which forms part of the Transport for London Road Network (TLRN) runs immediately south of the estate, and the A238 Merton High Street which forms part of the Strategic Road Network (SRN) bounds the estate to the north. South Wimbledon Northern Line Underground Station is located in the north west corner of the estate. The closest tramstop (Morden Road) is located approximately 700 metres south of the estate. There are also a number of bus routes which run along Morden Road and Merton High Street. The estate therefore has a Public Transport Accessibility Level (PTAL) range of 4 to 6a, on a scale of 1 to 6 where 6 is the most accessible.
- Although the estate doesn't fall within the Crossrail 2 safeguarding area around Wimbledon issued by the Department for Transport (DfT) on 24 March 2015, TfL reminds the Council that the Crossrail 2 project team will need to be consulted on any regeneration proposals to ensure that they would not adversely affect the delivery of Crossrail 2. Or whether there are any opportunities which could be presented by Crossrail 2, either directly or via relief on the existing northern line (connecting stations). The tram is unlikely to be unviable without considerable uplift in housing development along the corridor.
- The A24 Merantun Way currently operates like a bypass. There is only one existing vehicle access point onto Merantun Way via High Path between its junction with Morden Road and the Watermill Way roundabout. TfL would be unlikely to support additional vehicle access points onto Merantun Way.
- Cycle and pedestrian permeability onto Merantun Way would be likely to be supported in principle and an extra formal crossing may be able to be accommodated.
- TfL would expect any changes to the frontage of Merantun Way, pedestrian provision, new pedestrian or cycle access points or an additional crossing to be funded through future development.
- South Wimbledon has been identified as the busiest point for a number of bus routes which serve the area. Mitigation towards additional capacity on bus services may be sought depending on the number of additional bus trips generated by future development.
- TfL welcomes the plan's reference to our potential tram extension to South Wimbledon. Whilst this is still at the very early stages of planning, this is very important to our proposals to increase the capacity and connectivity of the tram network to support more growth in south

London. The tram extension business case provided a number of potential housing and employment development options for sites and land adjacent to the tram network, which could assist in supporting the business case for extending the tram.

- The potential tram extension would increase the connectivity of the site, allowing residents in High Path easier access to jobs and opportunities in the Wandle Valley and Croydon town centre. It would also increase footfall at South Wimbledon, offering opportunities to grow the retail offering and amenities within this important local centre.
- TfL consider that there are significant opportunities to improve the urban realm and setting of Morden Road as part of a tram extension and thus welcome reference to this in 3.144-3.145. We will work closely with the Council on this once we have a better understanding of the Tram options available along Morden Road. In general any new development proposals would need to take account of the tram safeguarded route alignment.
- TfL believe that there are opportunities to integrate the potential tramstop into the development and create suitable temporary uses for the space before the tramway is delivered – for example, creating a space at street level within the building lines fronting Merton Road that is large enough to accommodate the tramway but using this for retail space in the meantime. Alternatively, it would also be possible to create a high quality public square with its own, set-back frontage for ground floor retail within the development, that later becomes a tram terminus.
- Creating a new entrance to South Wimbledon station would be challenging, as to create sufficient space for uncongested access and a new ticket gateline, it would require substantial reconfiguration of the interior layout of the station and space for alternative staff accommodation. This would need to be funded by future development in some way. However, TfL recognise that this could have passenger benefit, particularly if a tramstop were located near to this entrance.

Ravensbury

- The estate is located in the south of the borough. The A297 Morden Hall Road which forms part of the Transport for London Road Network (TLRN) which is located approximately 200m west of the estate. The closest section of the Strategic Road Network (SRN) is the A236 Commonsides West which is located approximately 1.5km east of the estate. The closest tramstop (Belgrave Walk) is located approximately 500 metres north of the estate. There are also a number of bus routes which run along Morden Road and St Helier Avenue. The estate therefore has a Public Transport Accessibility Level (PTAL) range of 1b to 3, on a scale of 1 to 6 where 6 is the most accessible.
- TfL recognise that the links to the local tramstops at Belgrave Walk and Phipps Bridge are of low quality, and therefore welcome proposals to improve these pedestrian links as part of the development of the estate. If TfL's proposals to link the tram network to South Wimbledon come to fruition, this would give residents of the Ravensbury Estate easy and frequent access to the Northern line. Increased frequencies at these tram stops (rising from 8tph now, to 12tph shortly and then to a possible 18-23tph in future) may also affect the PTAL of the estate, permitting slightly denser development than would otherwise be possible. As part of TfL's work and future ambitions opportunities for development around the existing tram network need to be considered alongside those concerned with the tram extension. An

increase in trams per hour and the relative increases in PTAL would need to be looked at from a density perspective.

Future Merton Team
London Borough of Merton
12th Floor Civic Centre
London Road
Morden, SM4 5DX

Our ref: HD/ 5025/11
2404

By email: estatesplan@merton.gov.uk

16th March 2016

Dear Sir/Madam,

Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Morden) Draft Estates Local Plan, Stage 2 Consultation

Thank you for the opportunity to provide comments on the Eastfields (Mitcham), High Path (South Wimbledon) and Ravensbury (Morden) Draft Estates Local Plan, Stage 2 consultation. Historic England is the Government's advisor on all matters relating to the historic environment and a statutory consultee on a broad range of applications affecting the historic environment including the Environmental Impact Assessment (EIA) of projects.

Accordingly, we have reviewed these consultations in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

We are pleased to note that the documents consider the historic context of the estates, and set out design principles that relate specifically to local context (para 2.47). The townscape policies pick up on the contextual analysis, and we particularly welcome the reference in EP H1 e) to celebrating the historic links with the Admiral Lord Nelson, and EP R1 e) considering the associations with industrial watermills and the Ravensbury Manor estate. This should help ensure that these documents will achieve good design and sustainable development, as set out in paragraphs 58 and 126 of the NPPF.

We would encourage the Council to consider the following suggestions to strengthen the documents further.

Of the three documents Ravensbury and High Path have the most interesting and sensitive historic environments, with listed buildings, registered landscapes and rich archaeological potential. Historic England is pleased to note that listed buildings and archaeological priority areas have been indicated on the maps in the documents. We would encourage you, in the

interests of completeness, to illustrate all designated heritage assets on maps. These include listed street furniture and the listed priory wall near the High Path Estate, conservation areas such as the Wandle Valley Conservation Area near Ravensbury Estate, and registered parks and gardens such as Morden Hall Park which is Grade II registered on the National register of Parks and Gardens of Special Historic Interest. It would help if the registered parks, conservation areas and archaeological priority areas were hatched or shaded on maps rather than outlined to show what is included within areas.

The Ravensbury and High Path documents helpfully reference archaeology, given their locations within APAs. We note the reference in the High Path document to Merton Priory (The Augustinian Priory of St Mary at Merton), and would suggest that you state that it is a Scheduled Ancient Monument (equivalent to a Grade I listing). Further advice on archaeological matters is available from GLAAS as the borough's archaeological advisers, contact Gillian King.

The documents also set out Design Code Requirements. Unfortunately these are generic and do not link back to the previous analysis of local context. There is an opportunity here for the Council to provide detailed guidance about how it would like to see the area developed, and the buildings designed. We would therefore encourage you to take advantage of this opportunity, and spell out more clearly, possibly with illustrative examples, what your vision for these estates will look like.

Finally, it must be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

Yours sincerely,



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David English

Historic Places Adviser

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Robert Deanwood
Consultant Town Planner

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Sent by email to:
estatesplan@merton.gov.uk

19 February 2016

Dear Sir / Madam

**Merton Council: Draft Estates Local Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood
Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
CV32 6JX

Ann Holdsworth
Development Liaison Officer, National Grid

ann.holdsworth@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Yours faithfully

[via email]
Robert Deanwood
Consultant Town Planner

cc. Ann Holdsworth, National Grid

Dear Sir/Madam

Merton's Draft Estates Local Plan consultation – Stage 2

Thank you for consulting Sport England on the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

In response to the consultation, Sport England would like to make the following comment on the consultation documents:

03 Analysis and planning policies – Eastfields issues and opportunities – Opportunities summary – Reconfiguration of open space to create functional open spaces, paragraph 3.47, site Specific policies – Policy EP E4 Land Use and Policy EP E5 Open Space

This section should therefore be revised to reflect Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' (http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf), which is in line with the NPPF. The statement details 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.

Furthermore, this section should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy (<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>).

04 Design codes

Sport England would recommend that Sport England's Active Design Guidance (<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>) is referenced within this section.

We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

Kind regards

Dale Greetham
Planning Manager

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All responses High Path

**Stage 3 Consultation – Pre-Submission
Publication**

December 2016 – February 2017



3 February 2017

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Dear Sir / Madam

Submission Draft Estates Local Plan Consultation Representations made on behalf of Latimer Developments Limited

Further to the issue of the 'Submission Draft Estates Local Plan – Stage 3 Consultation (December 2016 – February 2017) we write to make formal representations to the consultation on behalf of Latimer Developments Limited (Latimer).

Circle Housing Merton Priory and Latimer Developments Limited

The Submission Draft Estates Local Plan (ELP) refers to Circle Housing Merton Priory (CHMP) as the body to which the three estates were transferred to. Merton Priory Homes (which trades as Circle Housing Merton Priory) was formed in 2010 as a result of the transfer of stock from Merton Council and at that time became a subsidiary within the Circle Housing Group. Circle Housing Merton Priory owns and manages around 9,500 homes across Wimbledon, Morden and Mitcham including the Eastfields, High Path and Ravensbury estates.

In November 2016 the Circle Housing Group merged with the Affinity Sutton Group (through a merger of the two parent companies, Circle Anglia Limited and Affinity Sutton Group Limited) to become Clarion Housing Group. Clarion Housing Group is the largest housing group in the country with over 125,000 homes. The merged organisation comprises the parent company, Clarion Housing Group Limited, a number of charitable housing associations, including Circle Housing Merton Priory, a charitable foundation and a commercial company called Latimer Developments Limited..

As part of the Merton Regeneration Project, Latimer and Circle Housing Merton Priory plan to regenerate the Eastfields, High Path and Ravensbury estates.

Overview

Latimer welcomes the Council's support for regeneration and intensification of the estates as set out in the Draft Local Plan and for the broad changes and alterations made since the Stage 2 Consultation.

Latimer (and Savills as their planning agent) also request to participate in the examination hearings on Merton's ELP and to be notified when the document is adopted.

As you will be aware, Latimer is at an advanced stage of preparation of the outline planning applications for the three estates and it is anticipated that these will be submitted prior to the examination hearings.

Following a thorough review of the latest draft ELP, we have a number of minor comments and suggested amendments that we discuss in the following sections.

Comprehensive Regeneration

Latimer has undertaken an extensive feasibility and discounting exercise in selecting these three Estates for regeneration. Latimer has considered a number of alternative options, such as meeting Decent Homes Standards only, as set out in the Case for Regeneration and after extensive assessment recognises that the full regeneration of High Path and Eastfields and the partial regeneration of Ravensbury presents the greatest opportunity to realise significant physical, social, economic and environmental benefits for not only the Estates but the wider Borough. Latimer is therefore supportive of the Council for bringing forward the DPD to aid the comprehensive regeneration of each of the Estates.

The DPD at paragraph 2.21 refers to "comprehensive regeneration". Whilst Latimer is committed to the delivery of all three schemes, in planning terms planning permission could be granted for them individually. As such it would be helpful if the DPD recognised that the schemes are not mutually dependable and that they could therefore be granted planning permission separately should this be required.

Development Plan

The draft ELP will form part of the development plan and as such it is important to make it clearer, that any planning application must have regard to the whole development plan, including The London Plan (2016), the Merton Core Strategy and Sites and Policies DPD, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, unless material considerations indicate otherwise. This is an important legislative context that should be included within the DPD. This is currently not clear in paragraph 2.8 of the draft ELP.

Large Sites and Surrounding Character

As we stated in our previous representations, the London Plan Policy 3.7 identifies that large sites (measuring 5ha or more) are able to create their own distinct character and support higher densities. This is further supported within the GLA Housing SPG paragraph 1.3.35 which refers to sites over 2ha being a large site and therefore able to create their own character and define their own setting. Whilst it is recognised that development proposals should integrate with the wider area, as each of the estates are large sites, the policies should provide flexibility for the development proposals to create their own distinct character. Eastfields and High Path are large sites as defined by London Plan Policy 3.7 and all three sites are large sites as defined in the Housing SPG. It is therefore considered appropriate for this to be recognised and referred to throughout the DPD.

The draft ELP frequently refers to the ‘suburban setting’ in which the Eastfields and Ravensbury estates are situated. Given that they are large sites which can create their own character whilst integrating with the surrounding area, this should be made clearer. Furthermore, it would be prudent for the draft ELP to replace the definitions of both urban and suburban within the glossary to those that are set out within the London Plan Table 3.2. This would ensure conformity with the London Plan.

The London Plan describes suburban sites as ‘*areas with predominantly lower density development such as, for example, detached and semi-detached housing, predominantly residential, small building footprints and typically buildings of two to three storeys*’. Whereas an urban area is classified as ‘*areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District Centre, or along main arterial routes*’. Taking these definitions into account, alongside the size of the sites we do not regard it appropriate to describe the estates as suburban.

Additionally, the Design Requirements section (para 4.5) notes that ‘*A general approach to architectural design should be designed which allows different phases of development to have their own character*’. As noted above, the sites are large enough to accommodate different character areas which could be delivered as a single phase or over a series of phases. The phasing will be influenced by a number of matters, including but not limited to: construction logistics, decanting strategy, viability; therefore, there may be circumstances where a single phase could contain parts of a number of character areas which will be influenced by the design led character areas.

Conflict Between Policies and Inconsistencies

The design teams have undertaken an extensive review of the draft ELP and wider Development Plan and have developed outline masterplan proposals on the basis of detailed urban design analysis. We are broadly supportive of the changes the Council has made to rectify the conflicts between policies in the previous draft. Notwithstanding this, we have identified the following areas where amendments should be made:

- Policies EP H7, EP E7, EP R7 contain restrictive landscape requirements which do not align with the requirements contained under other policies. For example, Policy EP H7 ‘Landscape’ requires a number of mature trees to be retained in the playground to the north of the ‘Marsh Court’ block which is in direct contradiction with the urban design requirements for a building to be located fronting Pincott Road.. We suggest therefore that Policies EP H7, EP E7 and EP R7 should read that where possible, existing trees will be retained, however retention should be based upon a robust arboriculture and urban design analysis in line with Policy 7.21 of the London Plan.
- In accordance with national policy there is no requirement for the Exception Test to be undertaken for Eastfields and High Path. Reference to this should be removed from the justification sections for Policies EP E6 and EP H6.

- The PTAL rating at High Path varies across the site from between 4 and 6a. Eastfields and Ravensbury also have a PTAL rating of up to 3, and at Eastfields there is potential for this to improve through an increase in Thameslink services. These more accurate PTAL ratings could be recognised in the draft Local Plan rather than the blanket figure currently set out for each estate.
- The High Path red line plan does not include St John's Hall which is within the forthcoming outline application boundary for the estate regeneration. It is recognised that the red line boundary for the applications can differ to those included in the DPD. However, for completeness we have provided an updated Plan for High Path at Appendix 1 which we would encourage the Council to utilise.

Prescriptive Policies

Paragraph 2.5 of the draft ELP introduces the plan as a 'wholly design-led' document and is stated as being *'pitched at a high level; [with] specific building details will be developed by applicants such as CHMP and determined by the council through the planning application process'*. This general approach is supported. However, this approach has not always been followed through in the policies and supporting text of the draft Plan.

We welcome the increased flexibility in the draft ELP since the Stage 2 Consultation. However, there remain a few policies which are considered overly prescriptive. Any planning application for the regeneration of the Estates would have to be determined in accordance with the whole development plan, and not just the policies within the ELP. The ELP should not therefore be applied mechanistically without regard to other Development Plan policies, and this could be made clearer within the DPD wording.

Furthermore, as already noted, these are all large sites capable of creating their own character; therefore, the ELP should provide the flexibility required to allow this. Paragraph 59 of the NPPF, states that *'design policies should avoid unnecessary prescription or detail'*. The Planning Practice Guidance (PPG) (ref: 12-010-20140306) also states that Local Plans *"...should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability."* Further, given that the regeneration of the Estates will be delivered over a number of years it is considered entirely appropriate that flexibility should be built into the ELP to allow development proposals to respond to changing circumstances in order to create successful places. This approach would be entirely consistent with the NPPF and the PPG.

We support the increased flexibility in the draft policies; however set out below are a few examples of where additional flexibility could be incorporated:

- Townscape - Policy EP H1 (b) states that *'Streets must be designed to allow for clear unobstructed views along the whole length of the street particularly along Pincott Road and Nelson Grove'*. As highlighted within our previous representations, the PPG (Reference ID: 26-008-20140306) notes that *'Development proposals should promote accessibility and safe local*

routes by making places that connect appropriately with each other and are easy to move through...for this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities’. There are design and existing utilities constraints which will impact on the ability to provide a straight street through the site. Staggered streets create character and can reduce vehicular speeding. As such, this policy should allow for flexibility in how the central street is designed.

- *Street Network* - Policy EP H2 (b) provides prescriptive policy as to the street network to be retained and altered. Following the PPG guidance as noted above, providing a junction from Nelson Grove onto Morden Road may have traffic impact and movement issues, including being too close to the Merton High Street signalised junction. It would require all traffic to instead route through the masterplan site. As such, this policy could be amended to allow highways proposals to be developed at application stage through consultation with the relevant highways authorities.
- *Movement and Access* - Policy EP H3(c) refers to including measures to reduce the physical barrier of Morden Road. It is suggested this is amended to refer to “where possible” to take account of this being outside of the site boundary and proposals to be developed in conjunction with the relevant highways authorities.
- *Open Space* – Policies EP E5 (d), H5 (c) and R5 (d) state that ‘*All new houses must have gardens that meet or exceed current space standards*’. This blanket approach is too restrictive and does not take into account the nature of various styles of properties. It is common for both mews and town house properties to have smaller garden spaces, reflecting their historic design. As such, the policy could incorporate greater flexibility to reflect the various characteristics of different housing types and character areas.
- *Environmental Protection* – Policy EP H6 refers to investigating the potential air quality benefits of a CHP on existing buildings outside the High Path estate. It is considered unreasonable and unfeasible for an air quality assessment to consider the potential benefits to existing buildings which are outside the control of the applicant and the application site. In addition, Policy EP E6 refers to the existing culverted watercourse, which as set out in our earlier representations, has not been identified by extensive technical surveys. As such reference to this should be removed or evidence provided by the Council to demonstrate the existence of the watercourse.
- *Landscaping* – Policies EP H7, E7 and R7 each request that some existing trees on site should be retained. As previously mentioned some of these requirements are in direct conflict with other policies contained within the draft ELP. Furthermore, their restrictive nature limits the design-led process which the Council supports. The policy should therefore note that “where possible” existing trees will be retained; however retention should be based on a robust arboriculture and urban design analysis. This addition would reflect the wording contained within the High Path ‘Issues and Opportunities: Good quality landscaping and vegetation’ section (Page 102) which incorporates the statement ‘*unless there are other compelling reasons that provide benefits to outweigh this*’. It is also noted that Policy EP R7 requires the widening and enhancement of the

entrance to Ravensbury Park. This Policy should suggest the investigation of such measures only and be subject to feasibility.

- *Design Requirements* (Pg 174 – 179) – This section of the draft ELP provides ‘*detailed guidance to applicants that they will be expected to focus on in more detail to demonstrate that the Vision, Urban Design Principles and Site-Specific Policies of the Plan can be delivered*’. The section continues to refer to the design principles as guidance throughout this section. The title ‘Design Requirements’ thereby gives the impression of strict requirements and as such the section could be more suitably titled ‘Design Guidance’ to allow the masterplan proposals to respond accordingly. As set out previously, the draft ELP could also recognise that the level of detail to be provided with applications should be commensurate to the type and nature of the application i.e. an outline application will have less detail than a full application.
- *Design Requirements* – This section makes reference to providing communal bin stores for refuse storage. This could be amended to allow other solutions to be considered, for example Underground Refuse Systems, which will be subject to agreement with the Council’s waste team.
- Whilst the drawings provided within the draft ELP provide helpful imagery as to the potential opportunities of the estates, these should not be regarded as rigid design requirements and therefore a statement noting that the drawings are for indicative purposes only could be added.

Planning Application Specialist Document Requirements

The draft ELP identifies a number of required documents to be submitted as part of a planning application on each Estate. An example of this is Policy EP E6 ‘Environmental Protection’ where section (k) states that ‘*Development proposals must be accompanied by a working method statement and construction logistics plan*’. The level of detail to be submitted as part of a planning application should be commensurate to the type and nature of the application. Additionally, policy requirements should not be so onerous as to require details not normally required for planning application validation purposes. Taking account of this, planning conditions should be used in which to secure the further details of outline planning applications for the three estates. This is acknowledged in the latter parts of the draft Plan; however, is not clear in some earlier policies.

Intensification Areas

Policy 2.13 of the London Plan identifies South Wimbledon / Colliers Wood as an Intensification Area. High Path is within this Intensification Area and this should be acknowledged within the Estates Local Plan. Further, it could also be recognised that London Plan (paragraph 2.59) identifies that higher densities can be supported in Intensification Areas.

Financial Viability

Part 05 (Delivery, Implementation and Monitoring) Paragraph 5.4 states that ‘*CHMP have committed to an open book accounting process to facilitate the understanding of the impact on residents and council services*’ with regards to financial viability. Latimer would like to confirm that they are committed to an

open book accounting process with the Council; however it would not be appropriate for this to be made available in the public domain due to commercially sensitive information.

Summary

The Council's support for the regeneration and intensification of the three Estates is welcomed, and the alterations made to date from previous consultations are broadly supported. There are however some remaining concerns with the draft ELP, highlighted in detail above. Latimer welcomes the opportunity to discuss these concerns with the Council in order to ensure flexibility within the policies can be achieved.

Latimer reserve the right to submit additional representations to those set out, having regard to the detailed planning, design, technical and viability analysis that they are undertaking as part of the preparation of the masterplans for the three estates.

Should you have any queries please do not hesitate to contact me or my colleague Catherine Bruce on 020 3320 8286 / cbruce@savills.com. We look forward to receiving convenient dates to meet to discuss the evolving DPD.

Yours faithfully

A handwritten signature in black ink, appearing to be the initials "CB" followed by a stylized flourish.

pp. Jane Barnett
Director

Future Merton London
Borough of Merton
2th Floor Civic Centre
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Morden SM4 5DX

Our ref: SL/2006/100135/OT-07/IS1

Your ref: Email

Date: 2 February 2017

estatesplan@merton.gov.uk

Dear Sir/Madam,

Merton Estates Local Plan pre-submission publication

Thank you for consulting the Environment Agency on the above. Having been involved in the previous consultations, we are satisfied that most of our comments have been incorporated in the Merton's Estates Local Plan pre-submission publication.

Overall the pre-submission publication appears to be founded on robust and credible evidence base. The Environment Agency notes that the findings of the Sustainability Appraisal have been reflected in the document and used to inform the policies.

It is clear that flood risk is a consideration that has been taken into account in the preparation of the plan. We certainly welcome that the preferred options for the redevelopment of the estates are seeking to ensure that flood risk elsewhere is not increased, ways to reduced flood risk are being sought and any opportunities to make space for water are being considered.

The proximity of the Ravensbury Estate to the river Wandle and Ravensbury Park mean that there are good opportunities to restore the river Wandle through the park or undertake enhancements to improve the condition of the river as part of major redevelopment adjacent to it. Currently, the river is impounded and subject to a number of problems such as midges which have been problematic on a yearly basis. Redevelopment of the area provides an opportunity to improve the park and consider river restoration and enhancement to create a better functioning river and river corridor. This is recognised on paragraph 3.282, which we welcome.

Since we last made comment on the Estates Plan, the legislation for permitting works on watercourses has changed. Flood Defence Consents have been superseded by Flood Risk Activity Permits and now fall under the Environmental Permitting Regulations. Prior permission is still required for works in, over or under a main river or within 8m of the top of the riverbank.

We have attached more detailed comments below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully,

Charles Muriithi, MRTPI
Planning Specialist

Direct dial 0203 263 8077

Direct e-mail charles.muriithi@environment-agency.gov.uk



Eastfields

This area is situated within Flood Zone 1. However, the need to ensure surface water runoff is suitably managed to allow for the runoff rates that are compliant with guidance and policy is noted, as are the references to the inclusion of SUDS.

The suggestion of opening up a currently culverted watercourse on the eastern boundary of the site should be investigated further as part of the overall redevelopment. The opening up of a currently culverted watercourse could assist in managing flood risk at the site, as well as providing habitat and other biodiversity benefits.

High Path

This area is mainly situated within Flood Zone 1, though a part of the site is located within Flood Zone 2. The opportunity to increase the density of housing within a low fluvial flood risk area has been highlighted in the Plan. The recognition of needing to ensure surface water runoff is suitably managed to allow for the runoff rates that are compliant with guidance and policy is noted, as are the references to the inclusion of SUDS.

The Bunces Ditch, a designated main river, runs along the edge of or just within the boundary of the overall site. We note that comment is made regarding further investigations into the origin and route of this watercourse, as the exact line of a culverted watercourse can be difficult to determine from the surface. If there was an opportunity to open up a culverted watercourse it should be looked into further, as this can help to manage flood risk as well as having a number of biodiversity benefits. If development could be moved away from the watercourse that would also be of benefit in terms of access for maintenance purposes.

Ravensbury

The Ravensbury Estate is shown as being located within an area considered to be a high risk to fluvial flooding from the adjacent River Wandle. However the plan recognises that this needs to be effectively managed as part of the redevelopment of the estate. Ravensbury Estate is already developed for residential use and new development would offer the opportunity and potential for mitigation measures to be incorporated into the redevelopment. This would include the raising of the finished floor levels of dwellings to a minimum of 300mm above the 1 in 100 year flood level, taking into account climate change.

There would also be the opportunity for flood resistant and resilience in the redevelopment, which is also welcomed. Reference is also made to a SUDS strategy as part of the redevelopment. However, due to the varying levels of flood risk across the Estate, there is a need to carefully consider the sequential and exception tests, as well as the requirement for a site specific flood risk assessments. Adequate provision and consideration needs to be given to the category of development proposed for each area on the Estate and its compliance with the NPPF and the Boroughs own Policy on flooding. The introduction of a greater number of residential dwellings in an area at risk to flooding should be carefully assessed to determine whether it can be considered as appropriate in that location. In addition, any redevelopment proposal should be able to clearly demonstrate that there will be no loss of floodplain storage capacity and ideally, further storage for flood waters should be created.

It should also be noted that updated climate change guidance was released earlier this year, and therefore the most up to date information should be taken into account as part of any redevelopment plans. Any development should also take every opportunity to increase both the flood resistance and resilience to buildings and the surrounding environment.

We note that reference is made to the National Planning Policy Framework (NPPF) in relation to flood risk, and that it will be necessary to comply with the Sequential and Exception Tests as appropriate, and also the necessity of producing site specific Flood Risk Assessments to accompany detailed plans for the redevelopment of these areas.

Charles Muriithi, MRTPI

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Future Merton
LB Merton
9th Floor Civic Centre
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Our ref: LDF24/LDD07/KR01
Date: 3 February 2017

Sent by email to:
estatesplan@lmerton.gov.uk

Dear Sir/madam,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

Re: Merton Estates Local Plan Pre Submission

Thank you for consulting the Mayor of London on the Merton Estates Local Plan Pre Submission regarding its general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. This letter covers matters from the GLA and TfL.

General

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

The Local Plan makes clear that the redevelopment will include the protection of open space. This is welcomed and in line with London Plan 7:18, and is an important element in providing a high quality environment for future residents.

However, there does not appear to be an indication of the quantum of new development or even a range of new and re-provided homes for each of the three sites. Such a figure or range will be important to help set the context for most readers. The GLA and TfL are aware of the broad quantum envisaged through our involvement with Housing Zone designations, but this will not be the case for many others.

Affordable Housing

The Council will be aware that the Mayor has recently consulted on his Affordable Housing and Viability Supplementary Planning Guidance and Local Planning Authorities are strongly encouraged to follow the approach set out in the SPG. While this document is still in draft form, Merton is encouraged to take account of its approach and set a threshold level for viability for schemes coming through the planning system without any public subsidy (see SPG

for detailed guidance) and have a clear approach to seeking to increase the amount of affordable housing delivered to 50% using grant (as set out in the recently published Affordable Housing Programme Funding guidance) and other public subsidy. The SPG also offers guidance in relation to Vacant Building Credit.

Detailed Site and Design Policies

The Plan includes an appropriate level of detail in relation to landscape and environmental protection, including flood risk and drainage, (which are recognised as significant issues in some locations) for the three housing estates where development will be focused. The Local Plan also contains a range of more detailed points and policies relating to the design and height of buildings within the new developments, these are largely a local matter, but are broadly in line with London Plan design policies.

Transport Issues

TfL welcomes the reference to estate car parking being provided in accordance with London Plan maximum standards and would recommend that reference is also made to cycle parking conforming with London Plan minimum standards.

As stated previously, TfL would encourage the estate street networks to accord with TfL's Street Types guidance.

High Path

Page 106 f) *"Future extensions of the north-south streets ending at High Path southwards towards to Merantun Way must be a possibility, subject to TfL's support"*. TfL would recommend that 'must be a possibility' is replaced with 'should be explored'. As stated previously TfL would be unlikely to support additional vehicle access points onto Merantun Way.

Page 106 para 3.139 – It is important to reiterate that TfL will not pay for the reconfiguration of the station but should there be other funding mechanism for improvements, TfL would be willing to consider proposals

TfL welcomes reference to the tram extension to South Wimbledon and the requirement for developers to consult TfL on how to integrate the tram extension into development proposals on Morden Road.

If you would like to discuss any of the representations in more detail, please contact Kevin Reid (020 7983 4991) who will be happy to discuss any of the issues raised.

Yours sincerely,



John Lett
Strategic Planning Manager

cc Leonie Cooper, London Assembly Constituency Member
Tony Devenish, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Dear Future Merton Team,

This is further to my previous comments regarding Merton's Estate Local Plan, please pass the following onto the inspector.

By the inclusion of Secured by Design principles and standards within the regeneration of the estates the cumulative impact for all three estates would be positive in relation to crime. The design and layout of the estates should provide well-defined routes with spaces and entrances promoting convenient movement without compromising security so improve access and movement. The designs should be structured so that different uses do not cause conflict. All publicly accessible spaces should be overlooked to enhance surveillance. The developments should promote a sense of ownership, respect, territorial responsibility and community. If necessary physical protection can be included with well-designed security features. Increased activity in appropriate locations can create a reduced risk of crime and increase a sense of safety. The designs should also have future management and maintenance in mind to discourage crime in the present and the future.

In order to achieve a sustainable development the government has defined three fundamental dimensions : economic, social and environmental (National Planning Policy Framework (NPPF), page 2, paragraph 7). Crime has a direct impact on all three dimensions. NPPF section 7. Requiring good design, paragraph 58 requires local authorities to produce 'Local and neighbourhood plans' with a specific aim to 'create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion'. This message was repeated in paragraph 69 in section 8 Promoting healthy communities with the addition of 'safe and accessible developments, contain clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas'.

Policy 7.3 Designing Out Crime of the London Plan promotes a city of diverse, strong, secure and accessible neighbourhoods with greater security through design. "Boroughs and others should seek to create safe, secured and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.....Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.....Measures to design out crime should be integral to development proposals and be considered early in the design process, taking into account the principles contained in Government guidance on 'Safer Places' and other guidance such as Secured By Design published by the Police".

In the interest of creating safer, sustainable communities Secured by Design principles and practices should be incorporated within the Estates Local Plan for Eastfields, High Path and Ravensbury and the development carried out in accordance to those details. By working with the local Met Police Designing Out Crime Officers I am sure accreditation could be achieved.

Please note: if you do not receive a reply from me it might mean I have not received your email as some are redirected into a Spam box that I can not access.

Kind regards

Pat

**Pat Simcox BSc (Hons) | Designing Out Crime Officer | Metropolitan Police Service
MPS Crime Prevention and TP Capability**

Dear Planning,

Many thanks for consulting Natural England Regarding the Estates Local Plan pre-submission version; Apologies for the delay in providing our response.

Having taken a look at the documentation submitted it's clear that there is a desire to see the environment take a front and centre role (Policy ELP1) in the life of these estates in future both in terms of improvements on the ground now and also when accounting for climate change in years and decades to come. There is a big benefit to be seen from the proposed use of SuDS within the redevelopment on the three estates as this will help to improve water quality and quantity going into the River Wandle in the long term and also help reduce the surface water flood risks on the sites which are the primary area of concern from future changes to weather patterns from climate change.

The Sustainability Appraisal (SA) has been used to help ensure that there are realistic choices made during the process which enable redevelopment to go ahead while still achieving gains for the environment which are key to combating climate change and improving the health and wellbeing of those living in London where air quality is an issue. The options chosen give a good account of the reasons why and allow for a wide scope of improvements to the biodiversity on site across the three sites, with links to green corridors possible as well as green or brown roof spaces a possible feature.

Overall Natural England believes that provided the above elements are taken forward and there is a tangible improvement seen at the three estates as a result of redevelopment work then the environment will see benefits in the long term locally and more widely within London. The changes being suggested are not proposing huge modifications to the numbers of homes on the sites so it is unlikely that there would be a detrimental impact upon either Wimbledon Commons SAC or Richmond Park SAC however the Habitats Regulations Assessment process needs to be followed through to ensure that this is taken into account and mitigation is considered at the early stage to reduce risks in the first instance before impacts are possible.

Natural England will of course consider further comment when next consulted either during or after examination. Broadly however we do not have any major concerns to highlight.

Regards,

Piotr Behnke
Adviser
Sustainable Development
Thames Team

**Natural England,
Area 3A Nobel House,
17 Smith Square,
London
SW1P 3JR**

Tel: 0208 026 3893

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

Dear Sir/Madam

Thank you for consulting Sport England prior to the consultation on the preferred options version of the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

In response to the below email, Sport England would like to make the following comments:

Eastfields Policy EP E4 Land Use, High Path Policy EP H4 Land Use and Ravensbury EP R4 Land Use

Objection

These policies should specifically mention indoor and outdoor sports facilities and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', to ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

Eastfields Policy EP E5 Open Space, High Path Policy EP H5 Open Space and Ravensbury Policy EP R5 Open Space

Objection

These policies should specifically mention outdoor sports facilities and playing pitches and be in line with Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', to ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

OBJECTION – Local Plan & Evidence Base

The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that:

“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”

Paragraph 175 of the NPPF states:

“Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan.”

Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development.

Sport England is not aware of a robust evidence base for playing pitches and indoor sports facilities for Merton. It is not clear how this lack of evidence base has been/will be taken into account to develop this document.

Sport England would be happy to provide further advice on how local authorities can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England's website at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>. In addition Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England's website at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/previous-guidance/>. The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs. Information regarding planning obligations for sport can be found on Sport England's website at:

http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_contributions.aspx.

We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.

Kind regards

Dale Greetham

Planning Manager

T: 0207 273 1642

M: 07787 582 803

F: 020 7273 1513

E: Dale.Greetham@sportengland.org

All Resident's Associations responses

Stage 2 Consultation – Draft Estates Local Plan

February 2016 – March 2016

THE BATTLES AREA RESIDENTS ASSOCIATION

COMMENTS REGARDING THE DRAFT LOCAL PLAN FOR HIGH PATH ESTATE

I am writing these comments on the draft Local Plan for the High Path estate (published in February 2016) on behalf of the Committee of the Battles Area Residents Association and as residents of South Wimbledon. As a newly re-established Residents Association and only recently made aware of the Plan, we have been unable to formally present the draft Local Plan to local residents at a Residents Meeting or invite comments from them. We would hope to do so once the Council have reviewed feedback from the stage 2 consultation and when the Council offers residents a final chance to have their say on the plans for the estate.

Some of the Committee have attended the drop-in sessions regarding the draft Local Plan and viewed the estate. We consider the draft Local Plan is a very informative document. It is well thought out and the vision, design principles, historical context and site analysis are well written and expressive.

The site specific policies are clear and informative and provide a range of ideas and some detail to implement the vision and design principles for the re-building and re-generation of the estate.

We have some specific comments to be included in the feedback in respect of the Stage 2 consultation.

The whole estate

- The overall density should be planned taking account of the pressure on local services – schools, doctors, health visitors, local transport etc

Re Merton High Street

- We agree that the buildings fronting the High Street should be restricted to 4 storeys (with potential for a 5th storey setback). This height will mirror the height of the existing buildings on the opposite side of the High Street
- The mature group of plane trees to the east of Pincott Road should be retained and the one plane tree to the west. There are other smaller trees mainly maples and a few cherry trees which should be retained if possible, but they should not hinder the approval of future planning applications relevant to re-developing the frontage of the High Street which might require their removal. Similar trees could be planted in suitable alternative locations and this made a condition of the planning permission.
- The building line behind the line of plane trees could be brought forward by a few metres if required to make better use of *some of* the open space

next to the trees. However the building line must be behind the existing canopy and allow for some spread of the canopy in the future.

- The existing buildings or new buildings could be a mix of residential and retail to re-generate this stretch of the High Street. It is suggested retail units could be concentrated to the west of Pincott road up to South Wimbledon tube station. Some of these should be larger units to encourage well known retailers and help upgrade the High Street to become an attractive local shopping area for local residents.
- Then the new community centre (see below) could be located to the east of Pincott Road.
- Here the existing building line could be retained and a wide pavement located between the buildings (the community centre/small commercial offices/residential) and the green space under the plane trees. On either side of the wide pavement there could be seating areas or benches.
- There should be landscaping of the green space underneath the plane trees to make it more attractive. It is suggested a combination of large flowerbeds planted with shrubs, and a few raised beds with brick walls planted with either shrubs or flowering plants (depending on the managed maintenance regime in place after re-building the estate).

Re Morden Road

- The proposed re-development of Morden Road as a wide, straight boulevard with building frontages of an appropriate scale for a wide long street is welcomed.
- However, we consider the new block of flats and commercial space on the junction with Milner Road at a height of 8 storeys with a 9th floor setback is too high and this height should be an exception. In general, the height of new buildings should be restricted to 6 or 7 storeys with only a few of 7 storeys with an 8th floor setback. An advantage of restricting the height to 6 to 8 storeys is that this height would then be more in keeping with the heights of buildings behind in the rest of the High Path estate. We have suggested that the height of buildings in the rest of the High Path estate should be restricted in general to 4 to 5 storeys (see below).

Across the site

- It is appreciated that the aim of re-development is to create a new well designed high quality neighbourhood and at the same time to provide more homes and affordable homes available to buy or rent in the borough of Merton.
- However, we consider the height of new buildings in the rest of the estates should be restricted in general to 4 or 5 storeys. This opinion is based on viewing existing heights across the estate, in particular the 1950's blocks of flats built on the west side of the estate in the vicinity of Rowland Way and Hayward Close. Blocks such as these are the maximum acceptable height to maintain a sense of individual identity within a small community of residents rather than a faceless identity within a massive block of flats surrounded by other massive blocks.
- There was a display board at the drop-in sessions of the possible consistent design, form and character of buildings within the estate in the New London Vernacular style. This style is welcomed. However, perhaps

there should be more detail and explanatory photographs of this style of building included in the Local Plan.

- There should be a variety of buildings not just larger blocks of flats – some terraced houses or townhouses, and small blocks of flats or maisonettes. Some of these buildings could have small front gardens.
- We would suggest that not all buildings should have flat roofs. There could be some pitched roofs to add some variety.
- The New London Vernacular style encourages amenity space for each flat and it is suggested there should be a variety of styles of balconies, and some should be large balconies to give a sense of space to the buildings.
- There could also be walkways between some buildings with grass verges or planted areas.
- The colour of external material for the new buildings is important. It is suggested a yellow London multi-stock type brick would be more suitable rather than a red. There could be different yellow type multi-stock brick from different manufacturers, not just one type of yellow multi-stock brick. Yellow would bring both some bright colour to the estate as well as a softness. Yellow bricks would be in keeping with the frontage of the buildings in Merton High Street and the residential area of traditional terraced houses to the north of the estate known as The Battles. At present, there are low rise blocks of flats along Nelson Grove Road (built in the 1960's and recently), many of which are built in an attractive yellow multi-stock brick. So saying, the colour of bricks does not have to imitate the Victorian and Edwardian houses nearby, the estate should have its own identity.
- The external materials could also include natural stone.

Community shops

- At present there is only one convenience shop within the High Path estate – a Loco store situated in Pincott Road and not far from Merton High Street. It is noted that the Council supports the replacement of this convenience store.

Public recreation and open space

- It is agreed within the estate little of the land is actually covered by buildings. On re-building, it is proposed the housing density will substantially increase but the draft Local Plan makes it clear development proposals must provide public open space and suitably designed play spaces for all age groups. This is very important.
- We consider given the size of the estate, and easy access to large recreational areas such as Haydons Recreation Ground, Abbey Recreation Ground and the nearby Nelson Gardens, the Local Plan should prescribe a number of open spaces (whether medium or small spaces) rather than one large area (even if this is designed to be multi-functional). Then these open spaces would be easily accessible by all residents of the estate particularly families, teenagers and children, and elderly people.
- There are already some open spaces such as the green play area with mature trees in Priory Close which should be retained if possible and two sports courts which could be retained or re-located.

- Medium or small open spaces should be sensitively planted with native species to provide a leafy environment and encourage wildlife, some could include small play-areas for younger children. There are good examples of small open spaces interspersed with the terraced housing to the south of the Poets area and east of Haydons Road eg on either side of Norman Road there are two areas: a large green space situated between the houses and a smaller green space leading from Norman Road to Grove Road. There is also a green space off Deburgh Road.
- Another idea taken from this area is a planted width restriction.

A Community Centre

- The draft Local Plan does not prescribe a community centre. However, we understand from our local Councillors that this would be encouraged. It is suggested a community centre could be located on Merton High Street with perhaps a sports court as well (replacing the unattractive sports court in Stane Close). An advantage could be residents of the residential areas to the north, north west and west would also be able to use the facilities of the community centre, and renting out rooms in the community centre to as many groups as possible would help with running costs.

Parking

- As per the draft Local Plan as many on-street parking spaces as possible should be provided, but there could also be underground car parking. Parking bays should be provided for visitors, tradesmen and health workers/carers.

In conclusion

- New retail units in Merton High Street to the west of Pincott Road
- A community centre with its entrance from Merton High Street to the east of Pincott Road.
- The general building height across the site should be 4-5 storeys with some variations.
- Buildings fronting Merton High Street to be restricted to 4 storeys (with potential for a 5th storey setback)
- Buildings fronting Morden Road should be 6-7 storeys (with a few buildings having potential for an 8th storey setback). 9 storeys is far too high.
- An urban character based on the "new London Vernacular" of terraced streets, front doors to streets, use of brick and good design and access to quality amenity space. The final Local Plan should contain more details regarding the 'design, form, and character' of buildings built in the London Vernacular style.
- The predominant brick should be a yellow multi-stock brick – in different shades and textures in sympathy with buildings in the local area.
- One or two convenience stores within the estate.
- Medium or small open spaces dispersed throughout the estate, some of leafy quality, some with children's play areas. A sports court located within the estate, and possibly one attached to the community centre.
- Protect existing mature trees where possible. Plant new native trees.
- On-street parking and some underground car parks.

- Cycle docking stations throughout the estate and within blocks of flats.

We hope these comments are helpful.

Yours sincerely
Hilary Morris, Secretary

On behalf of Robert Giles, Chair
Philomena Kennedy, Vice-Chair
Carla Dresseno, Treasurer
Hilary Morris, Secretary
Bert Kennedy, Jon Batts, Wendy Blanks, Marie Mulligan, Gemma Sherwin –
Committee Members

Of the Battles Area Residents Association, Wimbledon SW19

Ravensbury RA Response to Merton Council's Draft Local Plan

1.0 Background:

Residents have been asked by Merton Council to provide their responses to the Draft Local Plan. 55 residents have signed to say they support the submission of this report style response.

2.0 RA Response to design of the Council's own "Have Your Say" document:

This document could have employed a much better form of construction. There were no page numbers to coordinate the readers comprehension of the huge booklet. Simply opening the envelope and not being able to immediately understand the general direction of how they were supposed to respond put most people off responding. Consultation questions repeatedly choose not to refer to actual pages in the main booklet or those in the Have Your Say pamphlet. Residents Name & Address should have been nearer the start not buried away at the back of the pamphlet. Question 1,2&3 should have also been nearer start. Document seems to have been rubber stamped by the council's cabinet but proof read by no-one.

3.0 Residents Response based on Stage 1

Ravensbury residents queried why the process moves onto Stage 2 when the overwhelming response to Stage 1 was against the redevelopment. Little mention made of this in the pamphlet and little attention seems to be paid to the overwhelming response to stage 1.

4.0 Question 1 (Having read and considered the council's draft Estates Local Plan and supporting document please indicate your preference at this stage for regeneration:

It is the Ravensbury RA's considered opinion that "Option 3: invest in existing properties to bring them to minimum modern standards" would be best for the Ravensbury community based on the response from residents. Too few options were delivered to residents with honest integrity. Self build should have been on offer possibly. It would be preferred that the Ravensbury homes could be properly maintained, long before they are modernised or possibly enhanced.

5.0 To what extent do you agree or disagree with the following aspects of the council's draft Estates Local Plan? Please select one of the following ratings for each topic area

We find this table effectively unworkable as a proper response, even in reply to the shortened paragraphs on pages 2 & 3 of the consultation pamphlet and especially to the extensive information given in the main booklet (pages 146-167).

In each of the Site Specific Policies, it appears that the "Policy Box" is given greatest weight, with "Further Guidance" having secondary weighting. Justification appears to be either an explanatory section or a potentially minor policy weighting depending on response by the general public and bodies such as ourselves. In each of these three subdivisions on Policy, there are several paragraphs to which a resident might have differing opinions. To ask a respondent to give a single rating to between 1 & 3 pages of policy information renders this table unfit for purpose.

6.0 Please tell us if you have any other comments about the council's draft Estates Local Plan?

We will use the following pages to respond to this section & to the relevant policies detailed in the council's Ravensbury extract of the London Borough of Merton Draft Estates Local Plan booklet between pages 146 and 167 therein.

Through discussions on doorsteps and in the general community, we find that there is an overwhelming number of residents still against regeneration through demolition because of the fact that this is not a resident-led regeneration with redevelopment on their own terms with proper access to design professionals rather than paltry access on the developers terms. Many residents speak of what can only be politely described as an arrogant method of consultation met out by the housing associations officers during this push for redevelopment.

Therefore our response is in the assumption that regeneration through demolition goes ahead despite the residents being against it both from the start and during the present time.

7.0 Policy EP R1 Townscape

a) Proposals should provide widening and landscape improvements into Ravensbury Park entrance adjacent to Ravensbury Mill whilst providing clear views into the park from Morden Road.

Currently there does seem to be sufficient views into the park for passers-by, however if demolition of the adjacent residents homes does go ahead, enlarging and enhancing the park entrance could be perceived as beneficial subject to proper design analysis being carried out. For example, Morden Road is a relatively main artery between Mitcham, Morden and even onwards towards Croydon - traffic volumes can be both heavy and with considerable speed at all times of day. The area of Morden Road by Ravensbury Park has poor visibility due to it's curved nature resulting in inadequate sighting lines for pedestrians negotiating crossing a road with fast traffic, especially at 6.30am on a wet winter's morning. Inadequate speed attenuation will otherwise result in this area becoming an accident hot spot.



Image above: Ravensbury entrance near the Mill building

Much has been said locally with regards to the concept of why locals and others enter the park in the first place: relaxation plus peace and quiet seems to be the main reason. Any opening up of the front of Ravensbury needs to make proper consideration of this feature.

In addition, wildlife (mammal, invertebrate and fish) passage between the two parks is effectively prevented by the main road as well as the waterfalls. This would therefore been a convenient occasion to

make provision for some kind of underpass (read "animal subway", "badger tunnel" or "critter crossing") possibly alongside the River Wandle itself or in close proximity to the junction of the two parks, thereby increasing provision for all wildlife and lowering their mortality rate.

Due to the limited clearance between the water level of the River Wandle and the underside of the road bridge at this location, it does appear that the current road bridge serves to restrict the flow of the River Wandle in times of high flow. A proposal to replace the current bridge with one that serves both higher capacities during flood and the current limiting effects on wildlife could therefore be proposed. The correct design might also serve as both a landscape feature and a traffic management feature, allowing better views into both parks whilst also applying speed attenuation measures on its approaches.



Images showing Ravensbury Park around exit onto Morden Road.

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.

We hope that all new buildings planned for the Ravensbury Estate (although this same area is known to many local residents as the Ravensbury Village), will be designed with sensitivity and relevance to the local architectural focal points such as the Ravensbury Mill buildings, the Surrey Arms PH and especially the weather boarded cottage. The use of bricks on all facades is preferred over any form of render, both due to the architectural relevance and the fact that render stains quickly and needs regular maintenance to keep it looking reasonable.

We would prefer that a major part of the sensitivity expected will be in respect to the scale of the buildings. Ravensbury Mill makes for a good demonstration of scale in regards to building height versus tree line. On our opinion, three storeys plus a tiled pitched roof would be the maximum building height if the character of the Ravensbury area is to be maintained. Four storeys with a flat roof would not be in keeping with the character that is prevalent in the area.

Roof design is of great importance for Ravensbury's character. All the roofs in Ravensbury are tiled pitched roofs, which serves as a unifying theme for the entire area. We would hope that all new roofs, even those of any proposed flats utilise this theme, potentially as a mansard roof if this serves to both

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accommodate increased building heights and serve to unify the overall architectural designs for any new buildings to be built in Ravensbury.

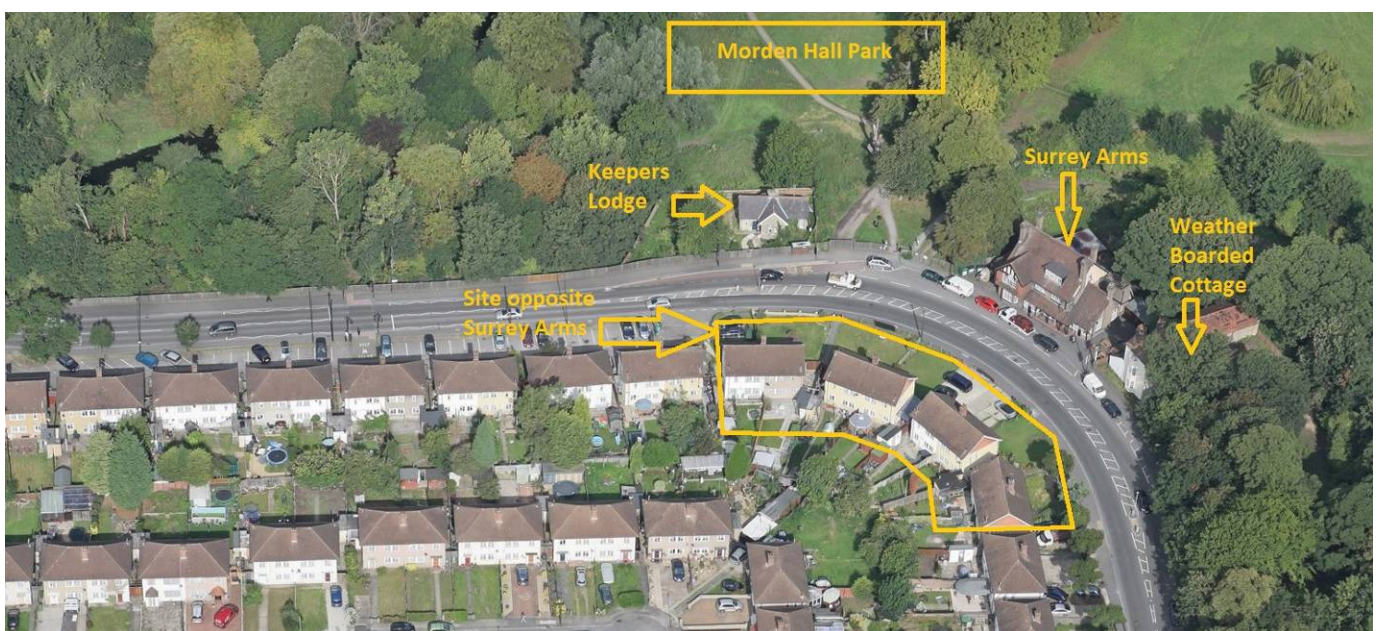
c) Proposals should reinforce the corner of the estate opposite the Surrey Arms Public House as a space and a place. Proposals should have a sensitive relationship to the pub particularly in terms of massing and height.

We agree that this area of Ravensbury needs very sensitive treatment in order to prevent any sense of overwhelming the current buildings. The pub is of three storeys in height, employing a dormer window on the main facade which softens its actual height and improves the viewers relationship with the building from the ground. The Surrey Arms' overall height maintains a good relationship with its surroundings, both on the main road and from within Morden Hall Park.

A new building that occupies the site directly opposite the Surrey Arms effectively serves as the key corner building potentially defining the character of Ravensbury. Standing at the gateway for the general public exiting Morden Hall Park, any building in this location should not significantly impact the surrounding environment. This site has the potential for overwhelming the key buildings and Morden Hall Park, therefore it should be restrained to the Ravensbury maximum of 3 storeys plus tiled roof. Any identikit architectural approach will have the potential to destroy a significant architectural opportunity for sensitivity.



Image above: Corner of Morden Road at the Surrey Arms, Image below: Aerial image of same



d) The setting around the entrance to Ravensbury Park should 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.

As described previously, we agree that this area is another key location for Ravensbury, defining an impression for passers-by and potentially significantly impacting on surrounding buildings of high architectural quality and character. As described previously, scale is of importance, particularly in relation to the setting between two parks and the relationship with the surrounding trees. therefore, we would expect a three storey maximum plus tiled roof in this location, and a preference to avoid flat roof construction. Mansard roofs and dormer windows could allow for increased height without overwhelming the surroundings.



Images above: Ravensbury Park entrance onto Morden Road

e) There is also scope to 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.

It is important to utilise local history in the same way as the current place names have: Hatfeild Close being a case in point. Please note spelling in such situations. If roads are possibly moved or added to in a regeneration, we would prefer that existing place names be retained in the first instance. A similar historical naming convention for buildings that house multiple dwellings would also be desirable.

Further guidance

3.244 *Proposals should investigate working in conjunction with the National Trust to consider the replacement of boundary treatment around Morden Hall Park to improve views into the park from Morden Road.*

Whilst we would expect that passers-by could enjoy better views into Morden Hall Park if wooden fencing were to be replaced with railings, there is also potential for the tranquillity of the park itself to be impacted upon and for wildlife/waterfowl to stray into the main road. Improving the setting around the entrance to the park beside the Surrey Arms may be a better suggestion, with a decorative brick wall forming the base to railings, as per another entrance, thereby allowing visibility into the park and a better appreciation of the park within.

We would expect the National Trust to respond in detail to this proposal and we assume that this proposal has been made in expectation of regeneration funds being allocated to improving the surroundings.

3.245 *Proposals may investigate working in conjunction with The National Trust to strengthen the Wandle Trail and ensure there is a unified approach to surface finishes, boundary treatments and materials used along the Trail.*

No comment.

3.246 *Proposals could investigate the scope to uncover and display the remains of Ravensbury Manor. The addition of interpretation panels could create a heritage focal point in the park.*

Whilst it would be nice to display the remains of Ravensbury Manor, the remains that were left until relatively recently were effectively demolished by repeated vandalism. Therefore a degree of restoration would probably be needed in order to fully appreciate this site. Information panels within the park would probably be of great benefit if this idea were to bear fruit.

We would expect that the Friends of Ravensbury Park be fully consulted on these proposals.

3.247 *Development proposals may consider alteration of the internal layouts of the ground floor flats, proposed for refurbishment to re- orientate the front doors onto the pleasant open space in front of the block. Changes to the layout of the rear of these retained flats could also improve car parking and provide some private back gardens.*

We are greatly against this suggestion and are somewhat awestruck at its inclusion. This seems to be a misinterpretation of a suggestion to provide incidental access onto the pleasant grassed areas adjacent to Hengelo Gardens and Ravensbury Grove or patio areas in the same position.

This suggestion came as a shock to many Ravensbury Court residents and also to the wider Ravensbury community. It seems that this suggestion has been dreamt up by a council officer in total exclusion of the residents themselves, which is almost equally shocking.

Ravensbury Court is in itself a very secure building, despite the lack of gated entrances. Its very design infers a private space and courtyard that belongs to the residents without needing to exclude entry by visitors or passersby through a gated community. There is and has always been a sense of neighbourly living and of a good neighbourhood, unlike many modern estates or even some established communities in other areas. This sensation of combined privacy, safety and community is one that pervades Ravensbury as a whole and has served the community extremely well over time. Crime rates have always been much lower than its surroundings, probably due to this very design. Within Ravensbury Court, there is a sense of community. Having the main entrances of both levels, upstairs and downstairs, serves to bind the community together. Passing people at the entrance to the stairwell reinforces this.

To suggest rendering a design such as this as potentially unviable seems ridiculous in the extreme. This is a design that has served the community well, over several decades. The design enforces the sense of place & private space within Ravensbury Court. The washing line areas are often used during the warmer months, the grassed areas to the front of the flats provide for a green and pleasant feature directly in front of the residents homes. The reasonably limited parking proves to be beneficial in terms of room for people to exist rather than communities. There is little negative effect, seen in many other post-war estates, through overprovision for the motor car.



Images above: Ravensbury Court

The internal designs of the Ravensbury Court maisonettes lend themselves to proper surveillance of both the courtyard within and of the grassed areas fronting Ravensbury Grove and Hengelo Gardens. This has benefited many families whilst raising young children. Children have happily "played outside" in Ravensbury for many generations, whilst in other areas of London there has been a steady decline.

If anything, residents have observed a decline of repairs and maintenance standards from their housing association landlord. Repairs have been badly managed all around Ravensbury, serving to reinforce the housing associations argument for regeneration through demolition. During the run-up to the initial announcement of regeneration, residents had been told that their area wasn't being repaired due to the coming regen project. Together with this suggestion, residents are being potentially failed at every turn it seems.

Justification

3.248 The townscape of the estate is somewhat secondary to the landscape. However, it does have the feel of a quiet and pleasant residential neighbourhood, as the housing on Morden Road prevents much of the traffic noise from penetrating within. The flats and housing to be retained are generally pleasant in appearance, though the larger block of flats suffers from a rather dead frontage due to a lack of entrances on the frontage.

Townscape discussion:

The design of housing fronting Morden Road does indeed serve to prevent much of the road noise from penetrating the interior of Ravensbury. This concept should be preserved in any future plans for the area.

The landscape both surrounding Ravensbury, and also within it, is a defining feature of our area. This is why many residents regard it as the Ravensbury Village; the community feel part of the landscape and it benefits their sense of belonging. Ravensbury is a unique location because of its sense of proportion and relatively low density in relation to the rest of Merton and even London as a whole.



Despite the landscape of Ravensbury forming such an important feature in the overall character of the area, it is important to note that the design, scale, relative proportions and general impact by the townscape is subtle and succinct, thereby enhancing the area. Tiled roofs, two storey construction and a reasonable density lend themselves towards promotion of the landscape. The tree-line is viewed with ease from within the estate and from Ravensbury Court also, enhancing the experience of the environment and greenery for a broad section of Ravensbury Residents. A significant feature of Ravensbury is that the tree-line is seen with ease, and remains unobstructed by any development. This should be retained. New developments should not force views from within Ravensbury to be marginalised and viewed from selected viewpoints.



Above: Aerial view of Ravensbury as a whole



Above: The significant tree-line when observed from Ravensbury Court & Hengelo Gardens

Appearance discussion:

Describing the Ravensbury Court frontages as "somewhat dead in appearance" seems a somewhat ridiculous description for a neat and tidy facade that allows for significant daylight through large windows that are very unusual for a 1950's post-war building and even rarer for more modern blocks. The significant design advantages that have been included in Ravensbury Court should not be trivialised.

We find that Ravensbury Court & Hengelo Gardens are very pleasant in appearance. The brick construction employed along with the "market garden" appearance of large green spaces is very attractive, and the moderate scale enhances the mood of Ravensbury.

What has been lacking was proper communication by the housing association with their residents, and proper empowerment of those self-same residents by being included in matters forming their future. An example in this instance includes the removal of rose bushes by the housing association which practically no-one on the estate were actually consulted upon. This kind of landscaping had enhanced the appearance of Ravensbury and served to also prevent anti-social behaviour close to the flats themselves. High-handed methods of building management have served the Ravensbury residents extremely poorly in recent years. Ravensbury Residents Association has tried to begin a process that we hope will serve residents well in future years.

Some residents in the flats began small gardens in order to enhance the area themselves. This approach should be encouraged rather than, as sometimes been the case, have poorly managed garden teams strip these self-same gardens into non-existence and have the managers of these teams complain that residents shouldn't be helping to improve the area anyway. Residents have experienced the latter on occasion but we hope that may have changed after residents voices have become louder.



Patios: A suggestion has been made to install a patio area along with glazed doors allowing access into that area as part of the regen works by the housing association. Some residents enjoy the concept of what would effectively be a garden door into the green space bordering Ravensbury Grove and Hengelo Gardens and some prefer the security and privacy of the existing arrangement. In both instances however, the concept of exiting onto what would now be a hard-landscaped space possibly defeats the idea of enjoying the garden area, "with feet on the grass" as some describe it. Residents should be given options and freedom of choice rather than be continually bullied. If some choose to retain grass if the regen goes ahead, then they should be allowed to make that choice. If they wish to tend a small area for gardening then they be applauded as these kind of activities are beneficial for both residents and the area as a whole.

The potential for flooding in the Ravensbury area is very high: displacing more water through hardlandscaping a patio zone seems ridiculous and counter-productive. The idea of installing front doors has no basis in support by residents and walking into what is now the rear of the property would require more tarmac to be placed, and a vast redesign of the interiors of the flats.

3.249 The Orlit houses fronting Morden Road provide a strong building line edge to the estate which, helps define the character of Morden Road, reinforcing the curved shape of the road. This winding nature creates prominent points along the route defined by the corners and the buildings at them – such as the mill and pub. There is scope to improve the quality of these spaces and better link the estate with its surroundings without compromising its quiet character.

The Orlit houses do indeed provide a strong building line that helps define the curved nature of Morden Road and lend it a degree of character in regards of neighbourhood. It should be noted that a very large number of residents appreciate the seclusion that Ravensbury's design affords them and have vociferously stated that they did not want any more vehicular or even pedestrian access routes into the internal network of streets.

3.250 On Morden Road the entrance to Ravensbury Park is obscured from view and highlighting the park entrance will strengthen visual links into the park from the surrounding area.

There are two entrances to Ravensbury Park on Morden Road. One is next door to the new surgery and the other is practically beside the mill building. Of the two entrances, the doctors surgery entrance is the one that is set back slightly from the road and therefore possibly more obscured from view. The mill entrance however is directly on the main road, has several pedestrian signs and cannot be missed by anyone, possibly asides from passing motorists that have their eyes on the road more than anything. However, it could prove beneficial to enhance this entrance if suitable suggestions are made. A steel arch along the lines of the other entrances is probably what the planners have in mind and would probably be a nice addition to the area. We would expect the Friends of Ravensbury Park to be consulted extensively on this.



Image: Ravensbury Park Entrance onto Morden Road

3.251 The architecture of the adjacent mill building provides inspiration which can be creatively interpreted in the design of buildings at this prominent corner of the estate adjacent to Ravensbury Park. Cues should be creatively interpreted to inform the design of new homes whilst ensuring proposals integrate well into a high quality landscape setting.

We would encourage a traditional interpretation that is consistent with the design of the mills buildings, utilising the brick facades and tiled roofs. As previously noted, mansard roof designs could be utilised to improve the overall impact on the immediate environment if the overall building heights are to be higher than existing.

3.252 The Surrey Arms Public House and adjacent weather-boarded cottage are key elements in the surrounding townscape, their location adjacent to Morden Hall Park entrance is a key focal point. Development proposals provide opportunity to reinforce these key elements.

It would be preferred if these architectural elements are used in any future designs for new buildings in the Ravensbury area. This would have the potential of creating a sense of cohesion and reducing the impact of new builds on what is a mature and sensitive environment.

3.253 Ravensbury Mill occupies a prominent location on the approach to the estate. Improving and enhancing the setting around the entrance to Ravensbury Park will help to highlight the Mill as a potential new heritage destination.

The Ravensbury Mill is indeed a significant site in the Ravensbury area. We would like some kind of height restraint and design code on new buildings that are situated in relatively close proximity to it in order to prevent unnecessary impact on both the park environment and the mill's location.



3.254 Currently visibility into Morden Hall Park on Morden Road is poor due to boundary treatment. Regeneration of the estate provides an opportunity to work in conjunction with the National Trust to enable views from the estate to this high quality landscape. Replacing timber fences with railings and improvements to the park entrance could increase visibility and accessibility of the park whilst improving the physical environment on Morden Road. Adding a new entrance opposite the Mill may also be a possibility.

Please refer to our answer to para 3.241. It is our understanding that the sighting lines for traffic negotiating the blind corner from Morden would negate the location of a traffic crossing here. Reference should be made to Merton Council's Highways department as well as any suitable guidance from TfL.

The effect on wildlife and waterfowl as well as the interior of Morden Hall Park itself should be considered. Some of the tranquillity within the park is afforded by the wooden fencing in visual and acoustic terms. A significant brick base to any new railings may serve to preserve or even enhance the tranquillity within the park.



Image: Blind corner for traffic coming from Morden

3.255 The remains of Ravensbury Manor are hidden from view amongst dense vegetation within Ravensbury Park. Uncovering remnants of these ruins will highlight the local history of the area and the park as part of the former estate of Ravensbury Manor.

Please refer to our answer to para. 3.246.

3.256 The retained large block of flats could be enhanced by the changes to their internal layouts which would enable entrances on the ground floor flats to overlook Ravensbury Grove Road.

As described in our answer to para. 3.247, we consider that there is significant potential for Ravensbury Court to be ruined by this proposal and we believe it has no substantiation in resident support. This suggestion would not be an enhancement and would in fact achieve the exact opposite.

We think that the consequences for the courtyard area of the building would be that the area would become a segregated zone used for car parking and rubbish. We think that this suggestion has not been thought through. If in terms of sketching out possible layouts, Merton Council has thought this through, would they please pass the designs to the resident association for proper scrutiny.

Page 148 - R1 Townscape Map.

We have annotated the map below accordingly:

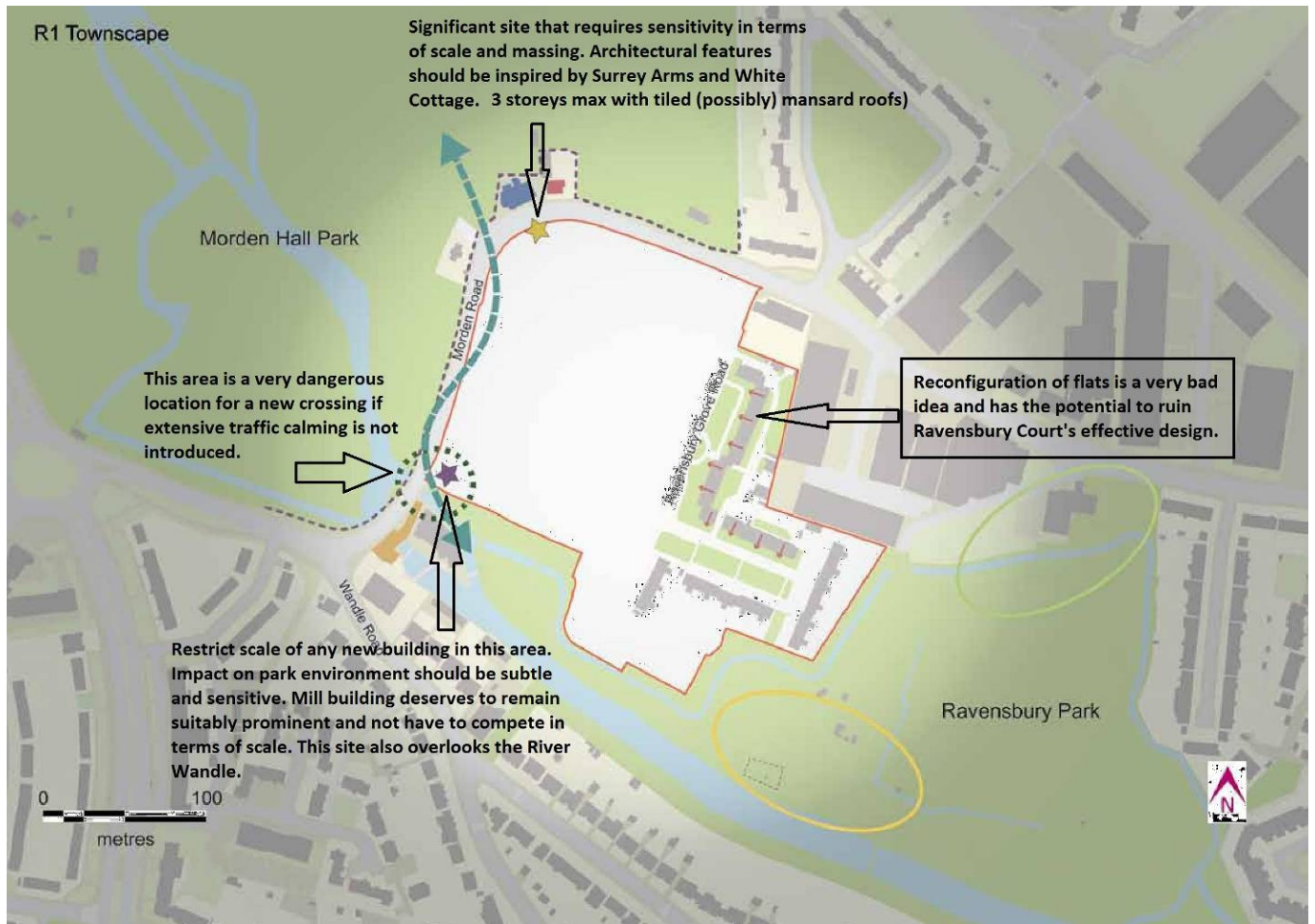


Image: Page 148 - R1 Townscape Map.

8.0 Policy EP R2

a) The historic street pattern of Ravensbury Grove should be retained as the main route into and out of the estate and the basis of an internal network of streets.

We agree that the historic street pattern is the best framework on which to base the future design of Ravensbury. Mature trees border the sides of Ravensbury Grove and green areas enhance the experience of initially entering the Ravensbury from the main road. The mood is welcoming and peaceful due to the layout of these elements.

In any new development there is always potential to make mistakes that eventually prove to be a significant downgrade whilst attempting to modernise an existing area. One of these could be the potential to make Ravensbury Grove completely linear, ie minus the current curve at its southern extremity and minus the slightly crooked element at its centre. We find that the crooked element has served to slow traffic down, being of the chicane design in terms of speed attenuation. In an area that has served children well for outdoor incidental play spaces, low traffic speeds have always been key in the safety of children who may cross the roads unsupervised. We would encourage the preservation of the current layout for this purpose and expect to see further measures introduced in order to improve safety through the control of speed.

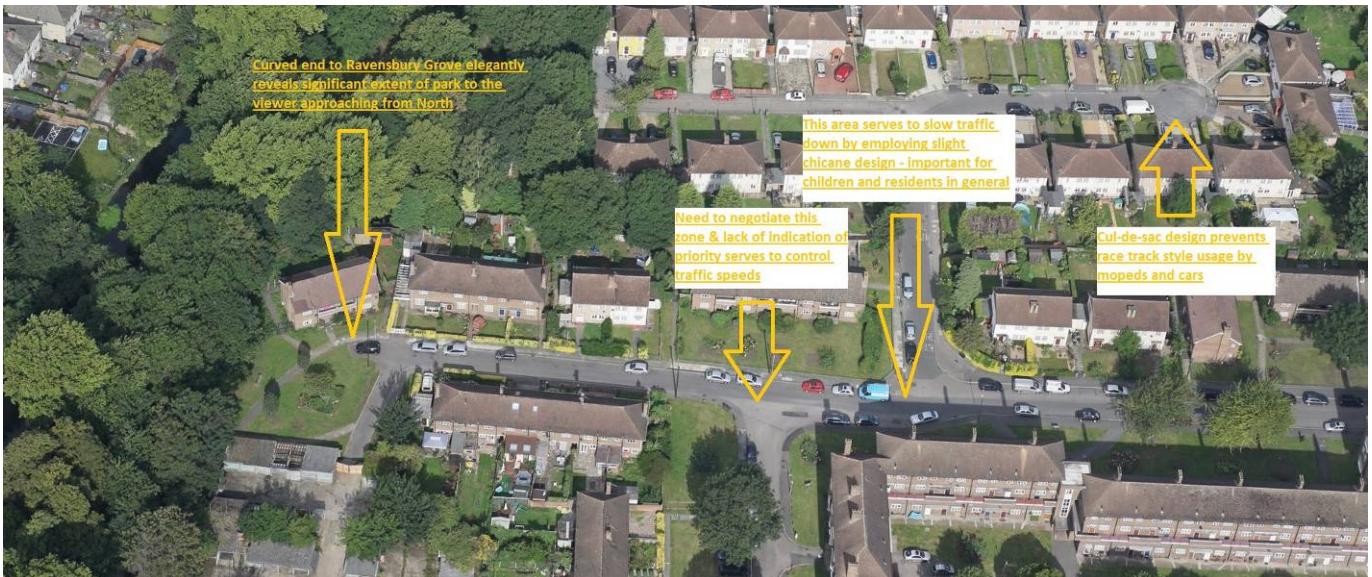


Image above: Southern part of Ravensbury Grove with effective traffic measures

The significant length of straight section in Ravensbury Grove can lead some drivers to accelerate far in excess of what should be a "Twenty's Plenty" zone. Speed attenuation measures would be helpful in this area.



Image above: Northern part of Ravensbury Grove with significant straight stretch of road

b) Ravensbury Grove should be extended fully to the boundary of the Ravensbury Park providing clear views along its whole length into the park.

We think that this could be a mistake. Currently the glazed area indicated in the image below serves as a green transition between built environment and the park itself. This area once had a greater number of large trees attractively arranged within the grassed area and served as a pleasant introduction to the park. The non-linear arrangement of this area with respect to the rest of Ravensbury Grove makes for an attractive line-of-sight as one walks southwards down Ravensbury Grove and encounters the park entrance. A sheltered area such as this is usually also a potential haven for wildlife, and should be retained and enhanced.



Image above: Southern extremity of Ravensbury Grove on approach to park.

c) Hengelo Gardens should be retained and enhanced, particularly with respect to arrangement of car parking, general landscaping and the potential for flood attenuation measures.

We think that Hengelo Gardens should be retained. We think that the grassed area in front of the houses on Hengelo Gardens needs to be considered with great care as it currently forms a pleasant swathe of green that is pleasantly coupled with the area alongside Ravensbury Court itself. Introduction of swale areas could degrade the overall appearance of this area if the current rose beds are removed or the grassed areas are diminished in favour of large gravel-based beds. The current arrangement of the car parking is pleasant - if there is scope to improve existing facilities without detriment to the overall appearance and residents are happy with the proposals, then there maybe be scope for introduction of alternative layouts. We must stress that proper consultation is important to get agreement from residents of Hengelo Gardens and Ravensbury Court who share this area in terms of parking and visual amenity.



Image above: Hengelo Gardens & grassed areas with parking facilities.

d) New proposals should include a network of streets that provide clear connections from Ravensbury Grove to Morden Road and views to Ravensbury Park.

When residents were asked about this during the Circle Housing consultations, practically all of them argued that opening up access onto Morden Road was extremely unwanted. They made mention of privacy, security & safety, through the lack of through traffic. This was a very strongly voiced opinion due to the overall advantages experienced by the current layout since its construction.

We would also like to make mention of the disadvantages of a potentially more permeable layout. Introduction of access points can lead to more crime and a reduced sense of security. This area is in need of a degree of defensive layout due to its position near the parks and a main road. The current arrangement of homes and street patterns seems to have had a definite positive effect on the reduction of burglary style crime relative to other areas, so we would hope that connections onto Morden Road from Ravensbury Grove are limited.

Further guidance

3.257 The estate is bounded by Morden Road, which is a busy traffic route. There is scope to implement targeted traffic management measures along Morden Road at key points to improve pedestrian connectivity to the surrounding area, reduce severance caused by traffic and improve road safety.

This sounds like a good idea and should improve the lives of people on Ravensbury. Focus should be made on the park entrances and pedestrian passage to the nearby tram stops.



Image above: Pedestrian Movement from Ravensbury towards park & tramstops

3.258 The access lane and parking for the houses fronting Morden Road should preferably be removed and used for tree planting and a new cycle route. This approach could also accommodate flood attenuation measures, such as a swale or uncovering of the historic watercourse. Some parking may be retained but should be better integrated into the layout.

We think that this access lane is very useful for residents adjacent to Morden Road. It currently serves as a parking area, play area and cycle path for people cycling between Morden Hall Park & Ravensbury Park. It allows for a larger degree of separation for children playing in front of their homes, and has effectively become a shared space with the addition of speed humps. It would be a mistake to remove this area as it has proved to be of benefit to residents.

Justification

3.259 The estate is physically isolated from its surroundings in a number of ways, including its street layout. There is only one access for vehicles into the estate and a minor cul-de-sac serving properties fronting Morden Road. The streets are set out in the form of a traditional cul-de-sac layout.

Residents have voiced the positive aspect of this relative isolation. The area is tranquil and sufficiently local to afford a strong sense of neighbourhood. The residents impression is that this is a very positive feature for them.

3.260 Despite the relative isolation of the estate and its physical constraints of the river and park, there is significant potential to improve links towards Morden town centre, by opening up the frontage onto Morden Road via new street and footpath connections.

Residents feel that the idea of opening up the village layout has greater negatives than positives. They prefer the limited access onto Morden Road as this provides security, limits noise from traffic on Morden Road, results in no through traffic, and improves their sense of a quiet neighbourhood where they know their neighbours and passersby. The existing footpath prevents motorbike usage with its railing arrangements and also is very well lit. These are the reasons why residents have said that this is more than sufficient.

3.261 New street network proposals should be well designed to provide clear connections that will reduce the current detached make-up of the estate, whilst ensuring that the estate does not become a through route for vehicular traffic from Morden Road. Any new East-West streets should form clear connections from Ravensbury Grove to Morden Road with active frontages onto public space. A new access from Morden Road with flexibility for vehicular movement may also be considered, subject to an assessment of potential impacts.

Residents have argued against any new East-West streets on the grounds of through traffic not being wanted within the estate. They argue that the very reason why this area has been so successful as a neighbourhood is partly due to the lack of through traffic and the limited access onto Morden Road.

9.0 Policy EP R3

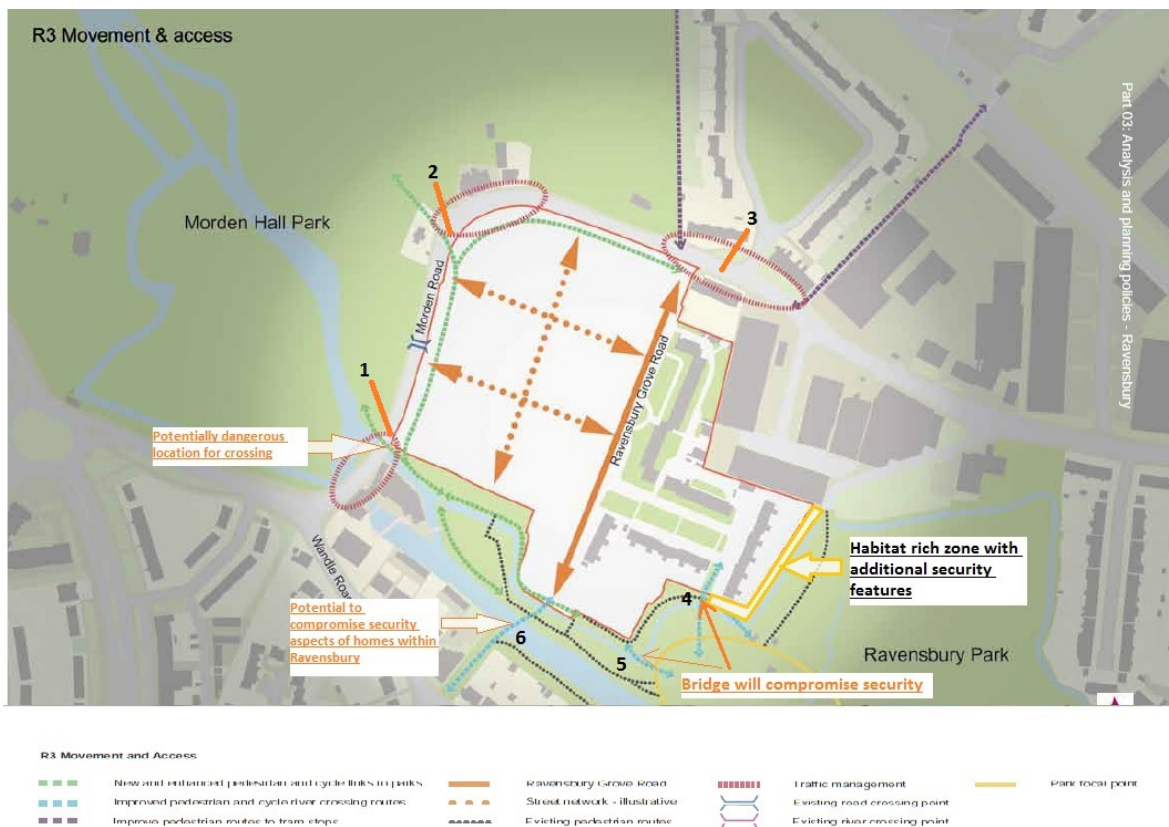
a) Proposals should improve pedestrian routes across the estate and to nearby parks, bus and tram stops. Routes should be linked into the proposed/existing street network along active frontages or existing walking routes, which should be well surveyed. Entrances into the park should be carefully designed and located to ensure accessibility into the park without undermining safety and biodiversity.

The advantages of these proposals seem exaggerated. Whilst this sounds initially attractive, residents have experience of increased pedestrian routes merely serving to make anti-social & criminal access that much easier. An example of this is to be found at the old park gate between 10 & 11 Hengelo Gardens. In previous years when access along the river channel was much easier, this area was used by people committing acts of burglary to escape via the park. Anti-social behaviour sometimes results in occupants within the park boundary targeting the Hengelo Gardens houses & their windows with stones. It is for these reasons that residents (of Hengelo Gardens especially) feel that an increased number of bridges into the park will be at the detriment of their existing home life.

We also understand that the habitat alongside the river bank to the rear of Hengelo Gardens is rich in biodiversity and something of a haven for wildlife, probably due to the lack of access by the general public & possibly dogs.

We would consider that if much of the area to the rear of Hengelo Gardens remained closed off, the benefits would be twofold: that of continued security and that of continued wildlife habitat, ie biodiversity.

b) The relocation of crossing point from Morden Hall Park to the estate to a position which allows for direct link to park route and new pedestrian / segregated cycle way along Morden Road should be investigated. Proposals should create a clear legible route from Morden Hall Park to the entrance of Ravensbury Park.



Images above: R3 Movement & Access with annotations

In the annotated image of R3 Movement & Access, we think that a crossing in Position 1 has the potential for an accident black spot being on a blind bend. This corner is notorious for speeding traffic where neither the driver nor the pedestrian can see around the corner.

Position 2 is potentially the better location as the bend is relatively much more open.

c) Improvements to cycle links along Morden Road should 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.

The current slip road off of Morden Road currently performs exactly this task and we think makes good use of the space available. Shared spaces are currently very fashionable: this slip road has been in existence for some time and has always performed as a shared space. Surely even a new stretch of road in this area would be better employed as a shared space assuming speed control measures such as road humps are employed also.

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 should be clear and designed as traditional streets, irrespective of whether they are for vehicular use.

We think that retaining the slip road is an idea for creating access for residents onto Morden Road, but not if it is to be used as another East-West vehicular link with Ravensbury Grove itself. Consideration of creating any kind of East-West link and thereby creating through traffic will be at the detriment of Ravensbury as a whole. The community has enjoyed relatively safe passage within Ravensbury Grove precisely because of the lack of through traffic. Traffic would tend to use any short cut available if there is a jam on Morden Road so this would result in a rat run effect in such situations.

Further guidance

3.262 Proposals should consider introducing physical features at key focal points along Morden Road to better manage the speed and flow of traffic and to improve road safety. To enhance pedestrian links there is also opportunity to build a new bridge to Ravensbury Park, creating a new North-South pedestrian link from Wandle Road to the Ravensbury Estate.

Speed management along Morden Road would be advantageous and probably highly necessary if density is increased with the Ravensbury area. There should be certain reservations in regards to the installation of another pedestrian bridge as past experience has shown the park to be used as an escape route at night.

3.263 Within Ravensbury Park there is potential to add additional bridges/walkways across the river and back channel which would allow for a better connection between the Ravensbury Estate and the play area in Ravensbury Park.

Existing residents are very unhappy about news of additional bridges and walkways to the park as they are only too aware of the kind of anti-social behaviour that can be reside within the park both by night and day. Based on past resident experience, these new connections would severely increase the potential for crime and anti-social behaviour. There are occasions when people throw stones at house windows from the park and the park is sometimes used as a means of escape for those committing crime within the Ravensbury area. Over-enhancing access to the park in these areas will only enhance the likelihood of these kind of events for residents bordering the parks perimeter.

3.264 To strengthen cycling there is scope to develop cycle links further along Morden Road for night time cycling when Morden Hall Park is less accessible.

If space allows, this could be a good idea, although there may be a need for speed attenuation measures if the cycle lane is within the carriageway.

Justification

3.265 Whilst the estate does have links to the surrounding area, they are generally poor and few in number. Morden Road is a busy road that creates severance between the two parks and the estate, as well as to the tram-stops to the north. To the south the River Wandle presents a barrier to the residential area to the south. Whilst there is a footbridge, it is not conveniently located for north-south movement and is poorly overlooked.

It is true that traffic on Morden Road does effectively create a barrier to be crossed, but the River Wandle is an attractive feature rather than a barrier. We feel that through-passage for pedestrians to the south of Ravensbury ie Wandle Road is being somewhat overstated.

3.266 There are two tramstops a short walk away that provide frequent services between Wimbledon and Croydon town centres. Bus routes also pass close to the estate providing access to Morden town centre, connections with other bus routes and the London Underground Network.

The two footpaths to the tram stops could be safer if the paths were directly overlooked by homes, but this will require the demolition of the homes in Deer Park Gardens and the demolition of the industrial estate on the East side of Ravensbury Path. We feel that the extended pedestrian routes via Ravensbury and onwards to Wandle Road are somewhat exaggerating the case for advantages of regeneration.

3.267 There is significant potential to improve direct links towards Morden by opening up the frontage onto Morden Road through new street and footpath connections. Proposals should create an easy to understand street layout for the estate including improved links to the Wandle Trail and Ravensbury Park supported by way-finding signage.

There is not really significant potential to improve links towards Morden. Perhaps there are certain limited advantages for moving the footpath access from alongside the park to align with Hatfeild Close, but this is not as dramatic as is being suggested. Besides from the fact that the footpath would have to remain in place due to general law regarding footpaths as we understand them, residents feel that the advantages for more connections to Morden Road do not outweigh the disadvantages: namely increased access to interior Ravensbury roads (such as Hatfeild Close) will increase the potential for crime and will increase the feeling of insecurity for their families, homes and possessions. Residents also feel that the ambience of the interior will be jeopardised with increased access to Morden Road. The current layout creates an oasis of calm away from the main road. Introducing the main road into the interior will destroy that.

3.268 Links from within the estate towards Morden consist of either a back alley or detour to the north. The pedestrian routes between the parks and cycling facilities on Morden Road are also unclear. The paths through Ravensbury Park are poorly overlooked with few escape points into the surrounding street network. It is therefore easy to get lost or disorientated in the area.

Once again, there is a degree of overstatement here. The back alley is a footpath that runs alongside the park and it is extremely well lit. The chicane arrangement prevents access by motorbikes also. If the footpath were wider, this might create a better feeling when walking down it and if vegetation were trimmed this would improve the situation also, but the latter is a maintenance issue.

3.269 There is potential to improve movement and access around the estate in a way that is relatively low-key whilst retaining the quiet feel of the estate. The crossing from Morden Hall Park to the estate is a key link in the Wandle Trail in connecting Morden Hall Park to Ravensbury Park. There is scope to improve this crossing through enhancements to footways and crossing point which ensure pedestrians and cyclists have sufficient space to move in a comfortable environment.

We see no need in improving movement around the estate itself as this is a very small area that has an interesting layout with considerable advantages over many other areas within Merton. The crossing points on Morden Road should be improved without recourse to regen funds. The Wandle Trail skirts the Ravensbury estate area and balance should be struck between overprovision for the trail versus important space for residents.

3.270 The amount of traffic using Morden Road makes for a unfriendly environment for pedestrians and cyclists. Measures to better control traffic and improve pedestrian and cyclist safety could be achieved by a range of methods, including surface treatments, raised crossing points, cycle paths, width restriction or build outs and pedestrian refuges. The most appropriate measures should be investigated whilst ensuring the road blends into the area making it feel like a place rather than dominating the space. A new bridge across the river linking Ravensbury Grove Road to Wandle Road would improve pedestrian links to nearby tram stops and bus stops.

The volume of traffic is something that will not be controlled or even subdued by any traffic control measures. Speed attenuation measures would help at the zebra crossing location near Deer Park Gardens due to the long straight of road coupled with limited pedestrian visibility on the approaches. At the Surrey Arms however, the corner itself helps to control excess speed to some respect. The open nature of the curve allows better visibility for both road users and pedestrians. The small pedestrian crossing island could be improved. If it is assumed that the regen will go ahead and that monies will be available for improving the streetscape as a whole, then we presume this will be implemented appropriately.

As stated previously, we feel that the case for another bridge is being overstated relative to the potential negative effects of anti-social behaviour and the effects of crime. It is important to design out crime and antisocial behaviour. These proposals suggest it will be designed into Ravensbury.

10.0 Policy EP R4

a) The predominant land use for this estate is to be retained as residential with the re-provision of the existing community room.

We agree that the only land use should be residential, with a community meeting hall for the residents usage only.

Further guidance

3.271 The applicant may propose other land uses, though these must be appropriate to the site and comply with local planning policies. There may be scope for improving facilities for enjoying and interpreting the River Wandle.

This sentence is somewhat vague and delivers little valid information for us to properly qualify it.

Justification

3.272 The estate is essentially wholly residential, with the exception of a small community room. There are some local shops nearby to the east on Morden Road, the Surrey Arms Public House opposite and soon to open Wandle Industrial Museum. Morden town centre is a 15 minute walk away.

The estate is indeed wholly residential and should remain that way.

3.273 Ravensbury is located within an area with a low level of Public Transport Accessibility. Taking account of these factors, and application of the London Plan matrix a range of 106 - 288 (gross figure which excludes land occupied by housing to be retained or refurbished) new homes are anticipated on this site. The council's expectation is for development proposals to be at the higher end of this range.

We feel that the council's desire for as many new homes as possible relative to the design matrix is at odds with maintaining the character of Ravensbury. The tree-line is an important element of the character of Ravensbury, and the potential for flooding is extremely high (Zone 3, the highest in terms of flooding according to the Environment Agency), therefore these factors imply a need to both raise the ground floors of new properties and lower the rooflines also. Being in the midst of two parks, an attempt to ramp up densities along the lines of a true brownfield site is at odds with the landscape, townscape and setting of Ravensbury. We would encourage a figure at the lower end of the range given.

3.274 Development proposals should contribute to the provision of a greater choice and mix of housing types sizes and tenures, including affordable housing provision, in accordance with relevant Local Plan policies (e.g. Core Planning Strategy Policy CS8 and CS9 and Sites and Policies Plan Policies DM H1, H2 and H3. Proposals should seek to provide a mix of housing types, sizes and tenures to meet the needs of all sectors of the community. In accordance with policy DM E4 (Local Employment Opportunities) major developments proposals will be expected to provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use.

On the surface, this sounds like a good statement but the residents experience has not been a good one in the regen consultation process. Therefore there is great concern about the lack of true scope for retention of Ravensbury residents. For example, some resident families need more than one car space but have been told that they can't have one. We find this kind of situation problematic in that there is a lack of scope for retaining valued members of the community. The concept of choice is far from that conceived within the council's offices.

It should be noted that a number of the Ravensbury community have been practically encouraged to leave since this regen was first mooted: older people, those privately renting from leaseholders who have been bought out by the housing association, and those who would be unable to continue living their lives properly due to the reduction in home facilities.

Residents in Rutter Gardens have been told that if they don't like the homes being offered (ie the new location within Ravensbury and the restricted parking allocation) then they would have to leave via a house swap (mutual exchange) with another family probably from outside the area - however this could result in them losing their secure lifetime tenancy status if the other family had a 5 year tenancy.

A family in Ravensbury Court (a mother with children who needs to move to a more suitable property due to her children's specific needs) has been told that there aren't any other homes for her to move into in Ravensbury or in Merton despite the fact that there are several empty homes scattered around Ravensbury. Members of the community have not been prioritised during this push for regeneration.

It would be important for local people to be offered work if the redevelopment goes ahead.

3.275 It is unlikely there will be any demand for other non-residential uses. The only exception could be some leisure uses associated with the Wandle Way walking and cycle route. However, this is a demand not yet established and facilities such as cycle hire, and interpretation centres may be more appropriately located in Morden Hall Park or the potential new museum at Ravensbury Mill.

We would like to point out that establishing cycle hire or similar usually requires car parking facilities which are practically non-existent in Ravensbury. Therefore, Morden Hall Park would be a far better location for such schemes.

11.0 Policy EP R5

a) Proposals should enhance access and links to existing public open spaces particularly the widening and improvement of access into Ravensbury Park from Morden Road.

No additional comment.

b) Proposals should retain and enhance existing public open spaces on Hengelo Gardens and Ravensbury Grove principally for flood mitigation measures. New landscaping should connect to and complements these existing spaces.

The open spaces on Hengelo Gardens and Ravensbury Court are very important for Ravensbury. The massing of the Ravensbury Court flats is reduced by the amount of set-back from the road and this also allows for the enjoyment of the green space for the residents of the flats. We would hope that any flood mitigation measures do not result in the actual loss of green space: swale areas should retain the grass, rose or flower beds if at all possible. Resident participation should be explored and validated with potential proposals.

Circle Housing has included a number of street benches in their proposals. We would like the opportunity to present these ideas to the residents who live near the proposed locations before these ideas are set in stone. Due to possible anti-social behaviour considerations, we think it highly likely that seating areas directly in front of private homes will not be to the residents liking.

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).

If any play spaces are proposed, we would prefer that the residents living beside the areas concerned are consulted before ideas are put into action. Residents must have proper opportunity to consider and reject proposals that are not to their liking.

d) All new houses and flats should have gardens or amenity space that meet or exceed current space standards.

In order to retain some members of our community, we believe some homes with two car parking spaces will be necessary. In discussions with the residents concerned, Circle Housing's regen team seem to have dismissed this completely, thereby effectively encouraging that resident to leave the area. We do not want this kind of approach and need proper contact with the architects outside the regen events in order to fully explore all avenues for retaining our community.

Further guidance

3.276 Any new public open space should link into a network of swales and the surrounding parkland landscape.

Utilising swale areas within the landscaping with hopefully create attractive areas, but we need to be shown the possibilities before we can form an opinion.

Justification

3.277 The estate is adjacent to a public park and not in an area deficient in access to public open space. Subject to meeting appropriate minimum standards concerning the provision of outdoor amenity space and play space, there is no requirement to provide additional public open space within the development. The estate is essentially surrounded by high quality public open space in the form of Ravensbury Park and Morden Hall Park. There are also pleasant linear open spaces with mature trees on Ravensbury Grove and Hengelo Gardens that should be retained.

Residents have stated this in the consultations also: there is no need for further provision of public outdoor amenity space due to the two large parks on either side of the estate.

Residents have requested that mature trees are most definitely retained in and around Ravensbury. It is important to explore the possibilities of retaining trees that lie on the border of the Ravensbury estate & Ravensbury Park margins due to the fact that a number of them could be removed if the Circle Housing proposals are given the green light. Initially, the proposals for the garages area could result in trees being removed. We would expect to see a proper tree survey and a report indicating the impact of removal if it is required by any planning proposal.

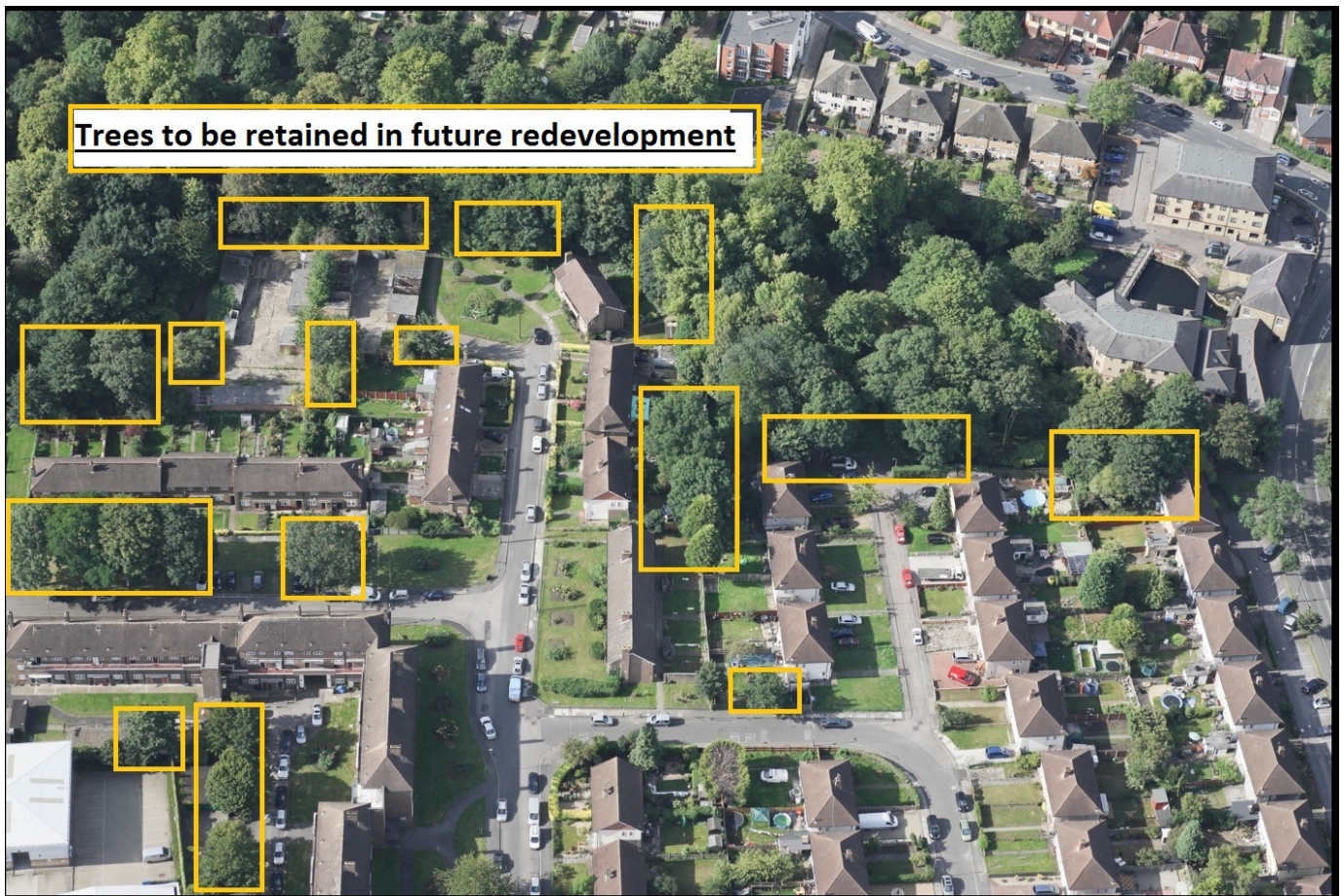


Image above: Trees within the Ravensbury Estate requiring proper survey & retention

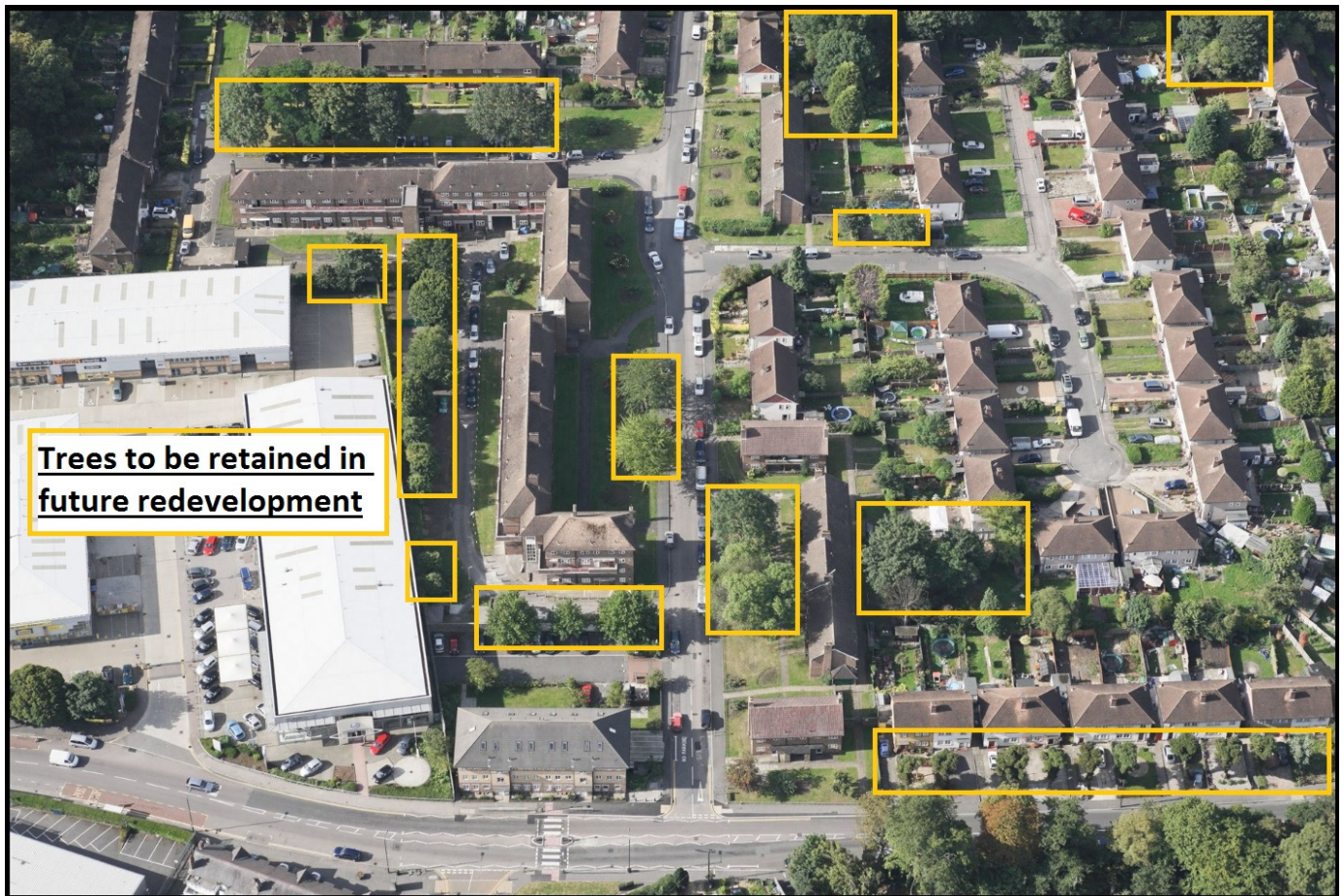


Image above: Trees under threat within the Ravensbury Estate requiring proper survey & retention

3.278 The surrounding open spaces are all important elements of the estate's high quality landscape character and setting. This needs to be carefully maintained and enhanced as part of any new development.

Much of the estate has quality open spaces that are very important elements of Ravensbury. We would encourage retention of these areas and would strongly object to any proposals to remove them.

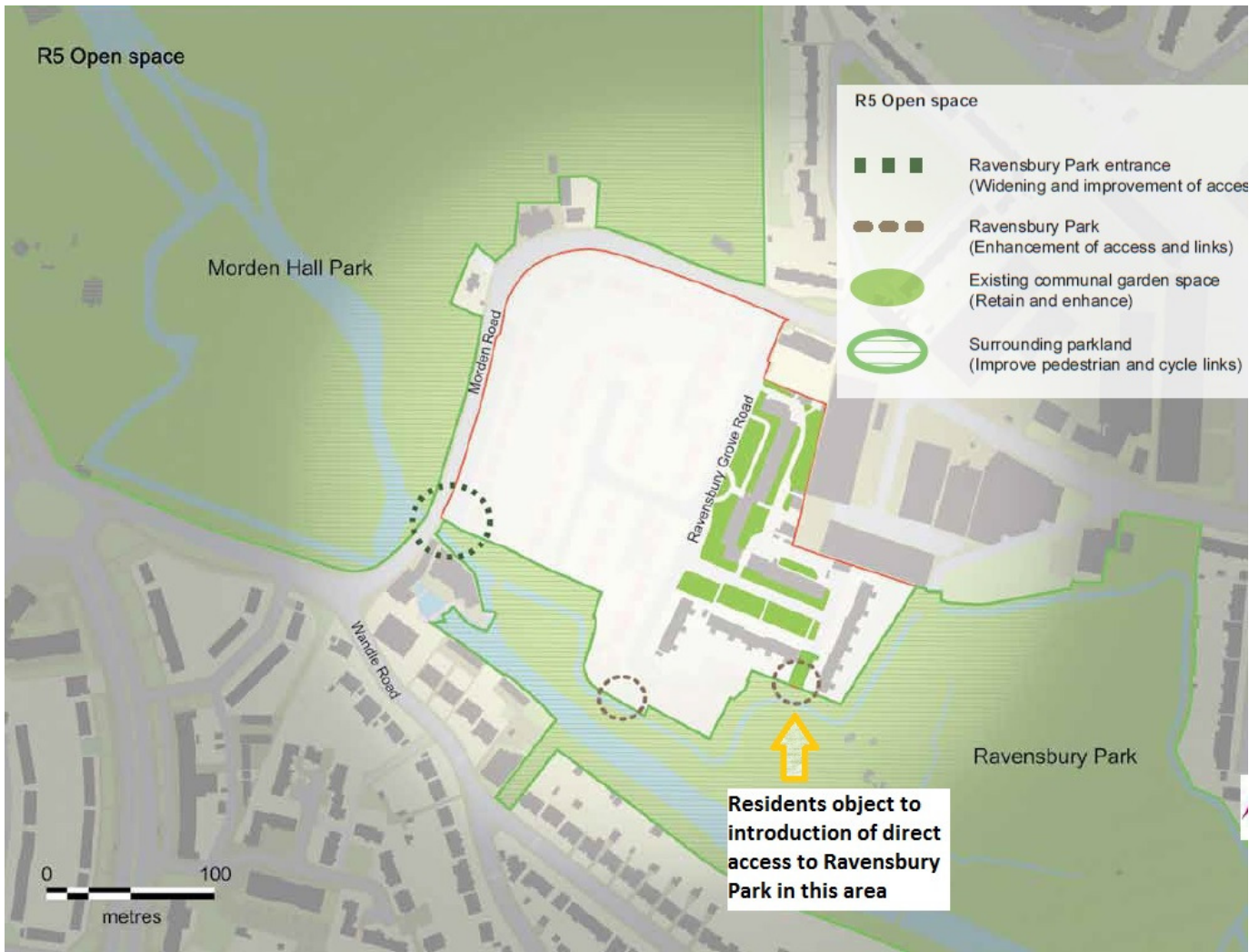
3.279 There are potential opportunities for off-site play space enhancements that might address the need for certain age groups while there will also be a need for some on-site play space. Any proposal should clearly demonstrate how the play space needs of all the age groups will be provided for with reference to the guidance in the Mayor of London's 'Play and Informal Recreation' supplementary planning guidance document (2012).

We would expect residents to have full review of play space implementation as well as the opportunity to reject proposals if need be. We have had insufficient access to the Circle Housing architects during their own consultation and therefore expect this situation to be remedied going forward.

3.280 The provision of gardens that meet space standards increases their functionality, potential for tree planting and the promotion of biodiversity. In keeping with the vision for the new neighbourhood as part of a suburban parkland setting front gardens or defensible space that allows for some planting, is also encouraged.

We would very much hope to see considerable replanting of trees within any rebuilt areas if the redevelopment goes ahead.

R5 Open Space diagram (from page 159) with annotations:



12.0 Policy EP R6

a) As the estate is in close proximity to the River Wandle, 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.

This statement is overstating the effect that swale areas will have on Ravensbury if the River Wandle floods to the extent that the Environment Agency has predicted.

Whilst a flood mitigation measure such as an area of swale may help reduce surface water runoff in times of flood, we think that it is important that proper advice is requested from the council's engineers, & possibly others if needed, in regards to the outcome of a significant flood as projected by the Environment Agency's own advice. Ravensbury is in zone 3a, only one designation below a floodplain. Therefore we would expect that to allow for the future provision of a flood of sufficient scale, the houses will need to be raised by 500mm or even more from ground level. As previously stated, swale areas are primarily designed to reduced the consequences of surface water runoff rather that flood water carried in from a river, whose catchment area extends upstream a considerable distance. We would anticipate a proper assessment of flood risk with defined values to form part of the evidence for redevelopment due to the increased building footprints in a new redevelopment potentially increasing the probability of flood for Ravensbury residents generally and possibly others along the River Wandle itself.

b) Sustainable Drainage Systems (SuDS) must be part of any major development proposal and can include a range of measures such as rain gardens, green roofs, balancing ponds, filter strips, green verges and swales; these should be designed to reduce post development runoff and provide water quality, amenity benefits and enhance biodiversity.

As stated above, swales will, in most probability, not accommodate the potential for the River Wandle flooding Ravensbury: it would simply be impossible to make an area of swale large enough for this. Swale areas are primarily useful in reducing runoff from the development itself. We would prefer that choice of roof construction be primarily concerned with reducing visual impact.

c) The proposed development must aim to reduce post development runoff rates as close to greenfield rates as reasonably possible, as set out in London Plan policy 5.13 and the Mayor of London's sustainable design and construction supplementary planning guidance and the government National Standards for Sustainable Drainage which sets out the requirements for the design, construction operation and maintenance of SuDS. If this is not possible, post development rates must be no more than three times the greenfield rate. The development must be designed to take into consideration flow routes should flooding occur, i.e. designing for exceedence.

We would like the flow routes to be compared specifically with locations of older persons homes as there is potential for these people to be particularly compromised in times of flood.

d) Public realm proposals should be co-ordinated with the wider SuDS strategy for the site and the proposed linear swale network to ensure an appropriate distribution of species throughout the estate.

We are keen to be consulted on the introduction of any species so that we may be able to properly qualify any statements made and consult residents properly.

e) 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.

Protected corridors are particularly important within Ravensbury. Flora and fauna are both potentially impacted upon by redevelopment within our area. Areas bordering the Wandle are known to have specific habitats which must not be destroyed by "tidying up" the river bank. There are areas that are currently closed off to the public and these areas should not be opened up due to the existence of these species.

f) Under the terms of the Water Resources Act 1991 and Thames Region Land Drainage Byelaws 1981, the Environment Agency requires flood defence consent for any works within 8m from the top of the bank of a main river and they therefore seek an 8m wide undeveloped buffer strip from the top of the river bank on main rivers and Merton seeks a similar 5m wide strip on either side of ordinary watercourses, where possible these distances should be exceeded. Development should not encroach on this buffer zone, which should be managed for the enhancement of biodiversity and to allow maintenance access to the watercourse, where required.

After reviewing the Circle Housing proposals, it seems that the specific location of the top of the river bank maybe in question. We say this because the buildings proposed appear to contravene the 8m wide undeveloped buffer strip. We would like to see further information on the agreed locations.

We would also like to know the definition of "undeveloped" in this instance. Would this include hardlandscaping or just soft landscaping? Would this strip be essentially unmanaged in order to provide habitat for wildlife or would an area of lawn also qualify?

g) New development must ensure the preservation, protection and enhancement of protected species and habits within the adjacent Ravensbury Park and should demonstrate that the proposals would result in net biodiversity gains.

Current bridge & path propositions which cross into the park already infer encroachment on essential habitat, therefore we would like to see these removed from the proposals. We feel that the river corridor, the garages area and the gladed area are all areas that contain locations that have become important for local wildlife. These areas need proper investigation in order to prevent loss of these habitats and associated species.

Further guidance

3.281 The landscape character of the estate is reinforced by the nearby tributary of the River Wandle. There is scope to reinstate a historic river channel which runs alongside Morden Road, which could connect with the watercourses within Morden Hall Park.

We would be somewhat concerned that reinstating the tributary may result in an increased likelihood of flooding within Ravensbury. We would like to see sufficient modelling to support claims that flooding will not be worsened or flood defences compromised.

3.282 Proposals should where possible enhance the outlook of the estate and improve the setting of the park whilst addressing biodiversity habitats.

We consider that building 4 storey blocks on a site adjacent to the park has the potential to ruin the setting of the park, potentially negatively impact on biodiversity due to its relative proximity to the park and nullify the views towards the park that are enjoyed by all residents of Ravensbury.

3.283 There is potential to enhance the backwater tributary channel of the River Wandle that runs along the southern boundary of the site, subject to Environment Agency (EA) flood defence consent as this is a designated main river. Improvements should seek to improve surveillance and interface between the park, buildings and the water.

We are concerned by this proposal due to the fact that this area affords a sheltered zone for wildlife that is well away from the more public areas of Ravensbury Park. There are significant areas that need to be essentially unmanaged for the benefit of biodiversity.

3.284 There is also potential to undertake in-river enhancements to the part of the main channel of the River Wandle to the south of the site, providing this does not increase flood risk and subject to EA flood defence consent.

We would appreciate sight of these reports from the EA particularly in regards to the effect on biodiversity.

Justification

3.285 Being adjacent to the River Wandle, its tributaries and two large historic parks makes issues of flooding and biodiversity particularly relevant to any redevelopment of the estate. These features define the character of the estate and carry various designations and responsibilities that proposals must embrace, address successfully, and take as an opportunity to positively shape and improve the surrounding area.

There is potential that improving an area for a redevelopment is quite the opposite to what is best for wildlife. We would therefore appreciate proper reports and valid consultation before any work is considered or implemented.

3.286 The interface area between any proposed development and Ravensbury Park, which is a designated as a SINC, LNR and Green Corridor, needs careful consideration, with particular reference to the habitats of the protected species within this area e.g. bats. This is a sensitive edge and a balance must be met between providing an active frontage onto the parkland whilst protecting the habitats of the park and surrounding vegetation.

We believe that there are other species such as voles and hedgehogs that exist in these areas. Therefore we would like to see proper protection and prevention of disturbance by construction surveyors and associated trades. We find it impossible to agree with disturbing habitats in the name of having a tidy river bank. This is completely at odds with a proper sense of priorities.

3.287 Of particular importance should be the enhancement of the river corridor and its environment, including dealing with flooding and surface water drainage issues. There are a number of mitigation solutions which should be considered including an open network of swales, permeable paving surfaces, areas of landscaping, front and rear gardens and above and belowground storage (i.e. maximise void spaces above and below ground as a form of attenuation). Swales must be designed to enhance biodiversity and visual amenity, as well as to attenuate run-off and improve water quality.

We believe that the powers that be need to exercise possible restraint in regards to the concept of enhancement of the river corridor. Unless proper local knowledge is invoked, the net diversity will drop like a stone.

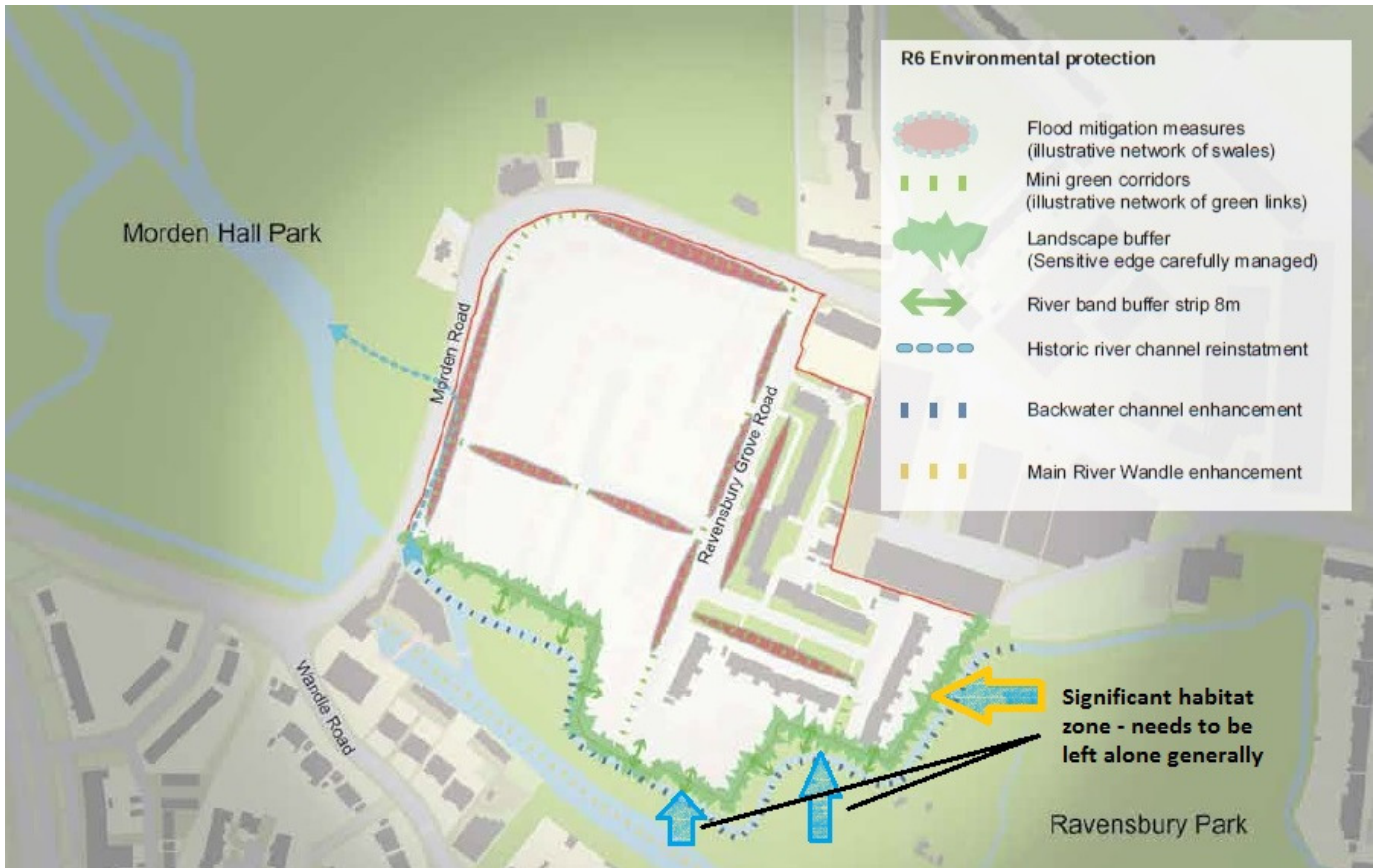


Image above: R6 annotated with observations

3.288 Reinstatement of a historic river channel running alongside Morden Road, would help to enhance the Wandle trail creating a stronger landscape link between Morden Hall Park and Ravensbury Park whilst improving the estates riverside setting, as well as contributing to flood mitigation measures.

We feel that there might be far better potential in renewing the road bridge next to the mill due to limited clearance beneath it. If this bridge were blocked, it could have the potential to cause flooding of the entire Ravensbury area. Hopefully the EA will be able to advise better in this regard.

3.289 Proposals are expected to be developed in consultation with relevant statutory and local interest groups such as the Environment Agency, the National Trust and the Wandle Trust.

3.290 Flood defence consent is required for any structure proposed within 8m of the river bank under the terms of the Water Resources Act 1991 and Land Drainage Byelaws 1981.

We would like to know if redevelopment is being considered within the 8m strip from the top of the river bank.

13.0 Policy EP R7

a) Proposed landscaping should 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.

Landscaping is an important feature within Ravensbury. Proposals do seem to indicate excessively linear streets, whereas some of the interest within Ravensbury comes from turning corners such that the townscape and also the park landscape is revealed. A strong link with the parkland isn't necessarily a linear street with a dead end that practically lands in the park. At the southern end of the current layout of Ravensbury Grove, the entire length of Ravensbury Park is presented to the passerby.



Images: View towards garages at southern end of Ravensbury Grove (LHS) & Existing buildings & glade (RHS)

b) Street tree planting and landscaping should be incorporated into streets whilst integrating with existing open space functionality, biodiversity enhancements and flood mitigation measures.

Street tree planting will be important if the redevelopment gets the go-ahead due to the need to visually break up the length of Ravensbury Grove and also to reduce the impact of new facades. As many as possible of the existing trees should be retained also.

c) An integral part of any development proposals for the site should be the significant widening and enhancement of the entrance to Ravensbury Park off Morden Road.

No additional comments.

d) Along Morden Road tree planting should 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.

This is important, however it would be prudent to discuss the species so that residents can partake in the selections and the reasoning also.

Further guidance

3.291 Incorporate landscaping measures to improve the green corridor link between Ravensbury Park and Morden Hall Park.

No additional comments.

Justification

3.292 The estate is defined and characterised by its landscape setting of the two parks and River Wandle. This is an essential element to its character that should not be lost. Indeed, there are various opportunities to enhance this character whilst still increasing density and building height to appropriate levels.

A substantial loss of mature landscape within Ravensbury would occur if redevelopment went ahead. Therefore it would be prudent to retain mature trees wherever possible. Substantial facades and entire plots would be free of any kind of greenery and therefore a very large amount of habitat related biodiversity would be lost immediately. Remedial measures need to be considered in order to allow wildlife such as hedgehogs, bumblebees, stag beetles, voles, nesting birds and the like to recover. Hedgehog doors should be installed in fence panels. Bird boxes for a variety of species should be installed. Insect hotels should be created and an avoidance of hardlandscaping might need to be implemented. Shrubbery should be chosen for its relative benefit to wildlife. Green walls should be considered, either for some of the homes or for the fencing panels themselves. Hedgerows should be created to maximise the beneficial effect on wildlife.

We feel that density and building heights are one of the key factors in a potential redevelopment that will significantly impact on Ravensbury's character. It is our considered opinion that 3 storeys would be the preferred maximum. The design process undertaken by Circle regen up until now has left a sour taste in the community's mouth - residents feel ignored and far from key stakeholders in the design process. There is a significant degree of no confidence in them as key stakeholders in such a defining process setting the future of Ravensbury such as this.

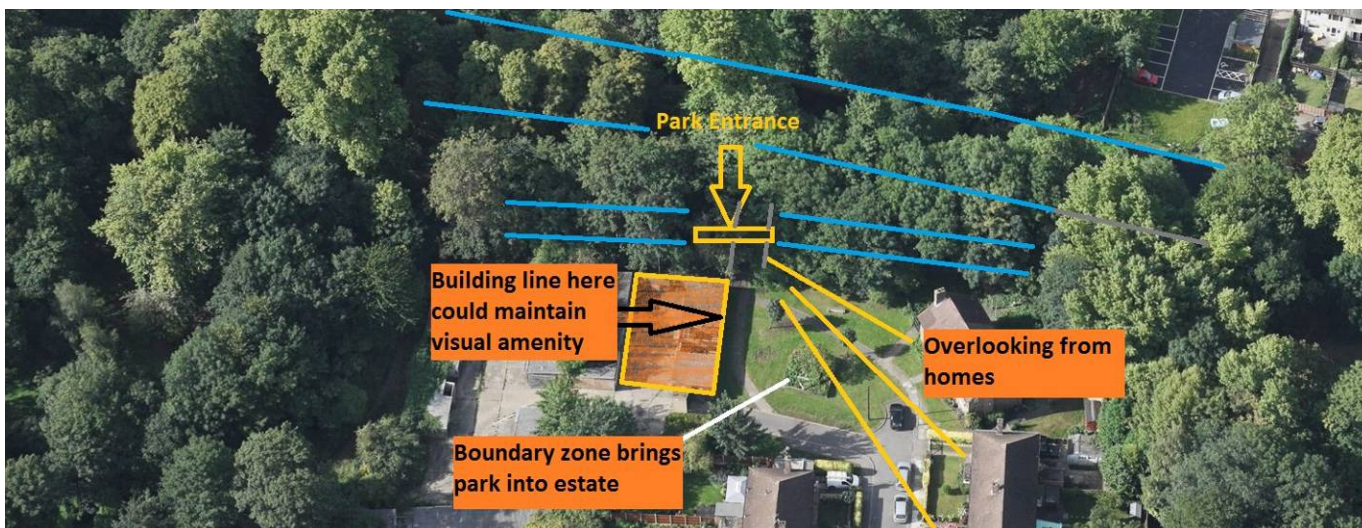
3.293 Large and well vegetated gardens also contribute to the estate's landscape character and redevelopment proposals need to be designed to maintain opportunities for such incidental greenery throughout. The estate's relative isolation is also an element of its character. This needs to be balanced with the need and opportunity to increase accessibility to and along the river and to the tram-stops to the north.

We feel that Merton Council is overstating the case for needing to "increase accessibility" to the river. Increasing accessibility along the river versus the implications on security are issues that residents should decide on the required balance, not Merton Council. There is a footpath to a bridge over the back channel of the River Wandle. Residents fail to see how creating other bridges to do the same thing provides any value to them - most can see the lack of value in security and anti-social behaviour issues. Another large bridge from Ravensbury Grove towards Wandle Road may also affect aspects of security as previously described, and once again it does seem that Merton is somewhat overstating the case for through passage of pedestrians to the tram stops.

The isolation from the hubbub of most of the everyday life is indeed part of the beauty of Ravensbury. Residents feel nested within the park landscape. The park practically forms part of Ravensbury. Bats can be seen flying within Ravensbury Grove, herons fly over, woodpeckers can be heard. Everything needs to be done in order to avoid potential losses to the community if redevelopment goes ahead.

3.294 Currently pedestrian gateways into Ravensbury Park are hidden from view and have limited overlooking which could be resolved by significant widening and enhancement of the entrance to the park off Morden Road.

We feel that the pedestrian gateways have quite considerable overlooking. The entrance on Morden Road is surveyed in its entirety from the flats in the Mill building. The entrance on Ravensbury Grove is reasonably well overlooked from the surrounding buildings. A balance needs to be struck between creating dead straight linear and potentially boring streetscapes versus the inclusion of glades, interesting boundary zones that are neither 100% park nor 100% estate, effectively bringing the park into the estate.



3.295 The skyline around the estate is enveloped by large mature trees and this is a key characteristic of the estate. Additional tree planting will bolster the landscape character of the area and create a landscape buffer between new development and traffic on Morden Road.

3.296 The Wandle Trail is interrupted by Morden Road and the narrowing of Ravensbury Park. There is scope to strengthen the green corridor link between Morden Hall Park and Ravensbury Park through the use of landscape features such as tree planting on Morden Road. This would also help to improve the continuity of the Wandle Trail and improve accessibility into the park. Tree planting could emphasize the entrance into Ravensbury Park.

It should be noted that the rear gardens of some of the homes have retained long-term habitat for a variety of species both bird and animal. We think that many areas should be retained as redevelopment goes ahead. Inclusion into the park might be one way to achieve this along the boundary with a redevelopment.



14.0 Policy EP R8 Building Heights

a) Buildings heights should not compete with established mature trees which envelope the estate and should not harm the visual amenities from within the adjacent parks.

3 storeys including the roof structure should be the higher limit to avoid competition with the tree-line. In our opinion, the employment of mansard roof & dormer window designs could help maintain the character of the area if any redevelopment happens. This is important along Ravensbury Grove as it serves to establish the character of Ravensbury as one enters from Morden Road. It is also important along the border with Ravensbury Park.

The tree-line and park views are a very important feature of Ravensbury. Established mature trees form a vital backdrop to all corners of the Ravensbury "Village". To live in this area is to live practically within a park and a country village. The large mature trees surrounding Ravensbury are vital in the definition of its character, as can be seen from the photographs below.

Little has been said about scope for retaining mature trees within Ravensbury. This is of particular importance to us as there are several areas where trees within the potential redevelopment zone are part & parcel of the character of Ravensbury: this includes trees to the rear of 52-54 Ravensbury Grove, those to the front and back of 2-18 Ravensbury Grove, trees in the vicinity of 241 Morden Road, trees in the vicinity of the Ravensbury Garages area (southern end of Ravensbury Grove), those to the front & rear of Hengelo Gardens, those in the courtyard of Ravensbury Court, those to the front of 171-197 Morden Road, plus others as indicated on the aerial surveys on the following pages.



View across Ravensbury Grove (LHS) & View behind Hengelo Gardens towards garages area (RHS)



View of Rutter Gardens (LHS) & View towards Hatfield Close (RHS)



Views around Ravensbury Court showing established mature trees forming a vital backdrop



Image: Northern End of Ravensbury Grove showing significant trees and two storey construction befitting landscape



Image: Southern end of Ravensbury Grove showing gladed area where park blends with estate.

Tree locations requiring retention in order to preserve character of Ravensbury

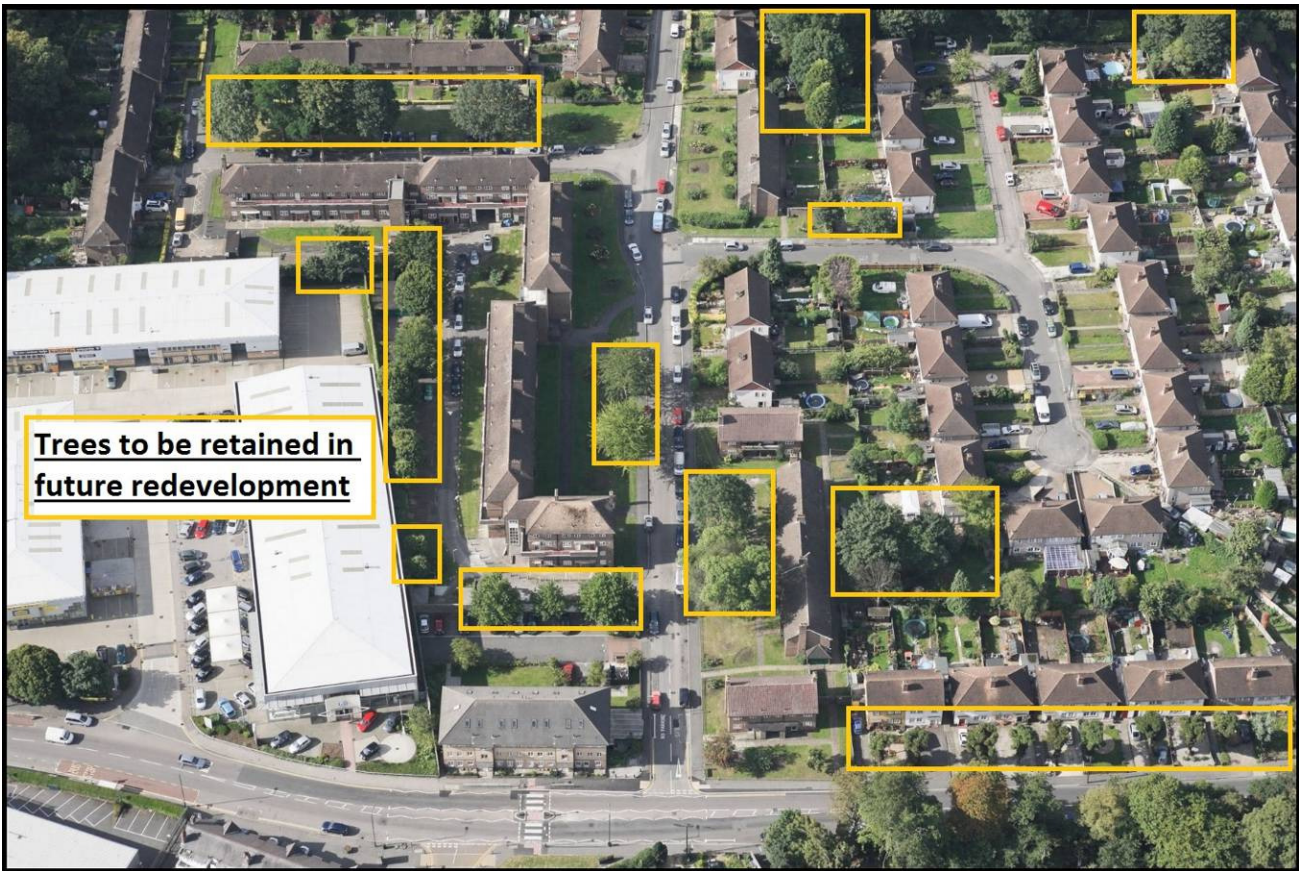


Image above: Trees to be retained in Northern end of Ravensbury

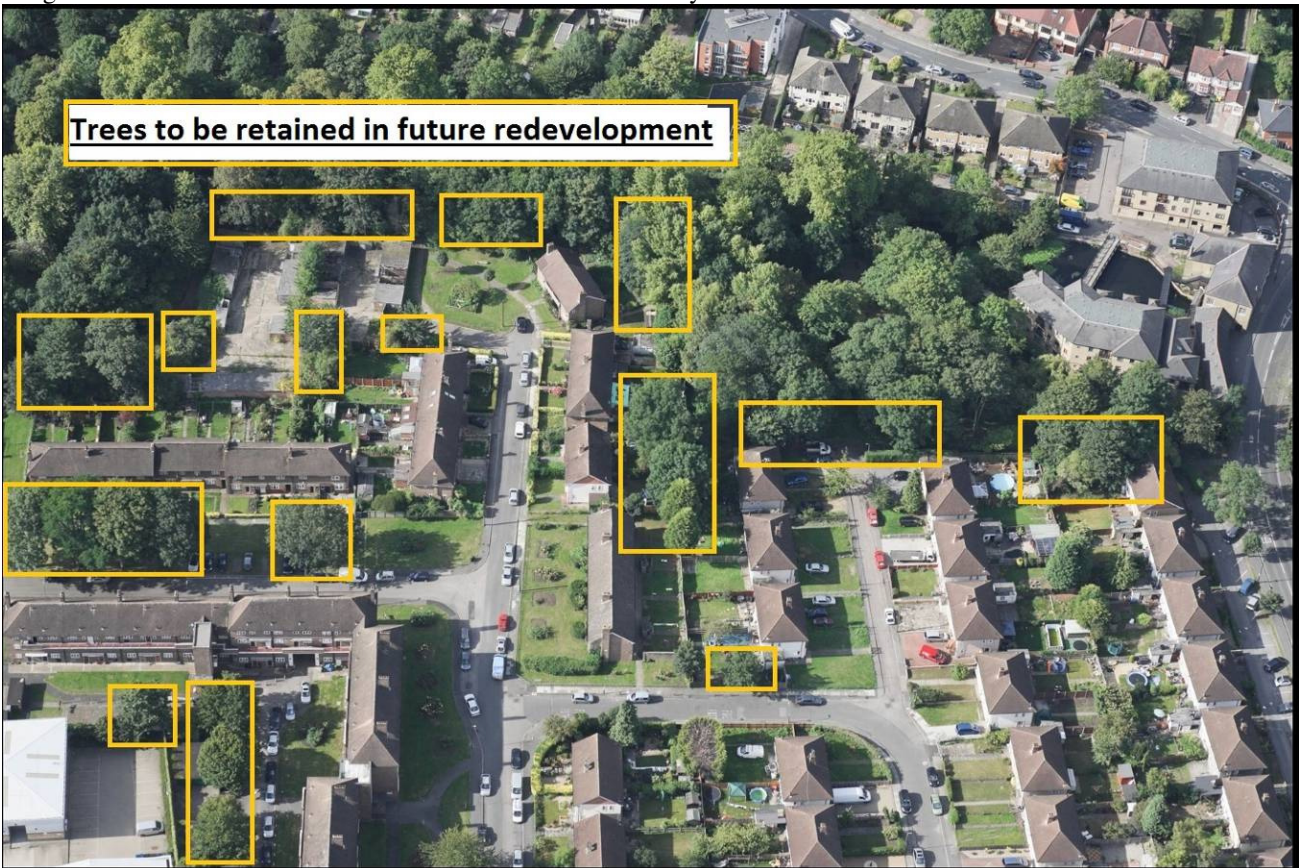
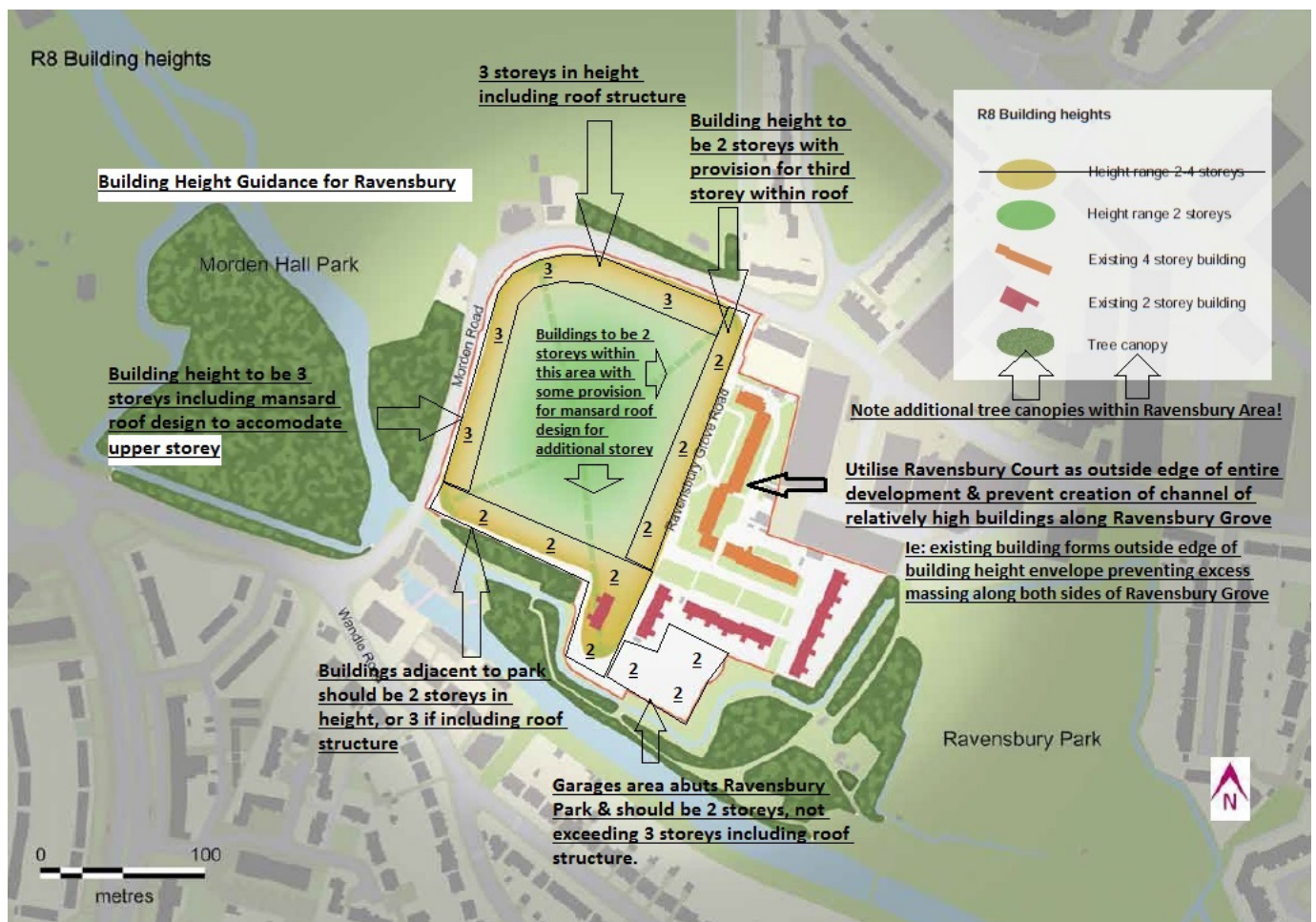


Image above: Trees to be retained in Southern end of Ravensbury

b) Within the development a building height range of 2-4 storeys should not adversely affect views to the surrounding established trees. Relatively open views from within the estate to the surrounding tree canopy are a defining characteristic of the estate and should generally be retained.

We think that 3 storey should be the maximum height along Ravensbury Grove as per our annotated map. To allow 4 storeys within the Ravensbury area is a mistake that would ruin the character of the area. Allowing the possibility of 4 storeys will give the green light to a developer at the expense of the character of Ravensbury. The Ravensbury area has worked as a cohesive design ever since its initial construction. The houses and flats work well together and do not vie for space or light. Ravensbury Court is considered as the Eastern edge of the estate and therefore should be considered as effectively the outer edge of any new development due to the need for cohesion in the design. This concept needs to be appreciated far more by both the council and the potential redevelopers. Buildings opposite Ravensbury Court should be restricted to 2 storeys with a possibility for 3 if the roof space is used for accommodation in the mansard design style. It should be remembered that scope for flooding may require new buildings to be raised by 0.5m to 1.0m above existing ground level according to the latest flood map (Fluvial Flood Risk and AIMS Flood Defences Merton - Level 1 Strategic Flood Risk Assessment, Figure 3.1 Inset 2 Rev 02)

The garages area is the highest part of Ravensbury, being 1m above Hengelo Gardens and even Ravensbury Grove & beyond. Buildings on this land will therefore be automatically taller than their existing neighbours even if they are built to the same height. Buildings directly against the park also will further limit views of the trees for residents of the Ravensbury area and tend to block out extensive existing views for residents of Numbers 1-16 Hengelo Gardens and Numbers 1-11 & 56-62 Ravensbury Grove.



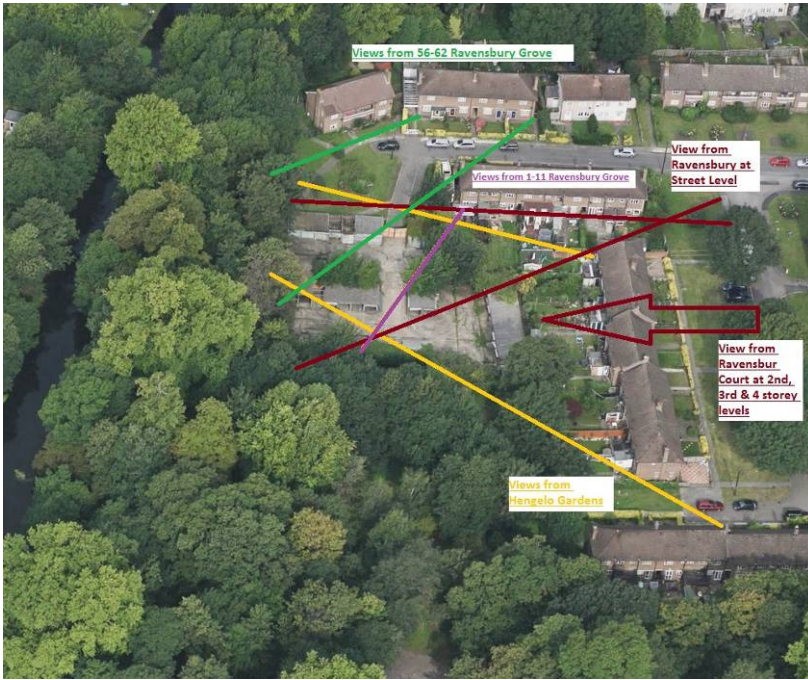


Image above: Effect on views from existing buildings towards garages area



Image above: Effect on views from Ravensbury Court across Ravensbury areas



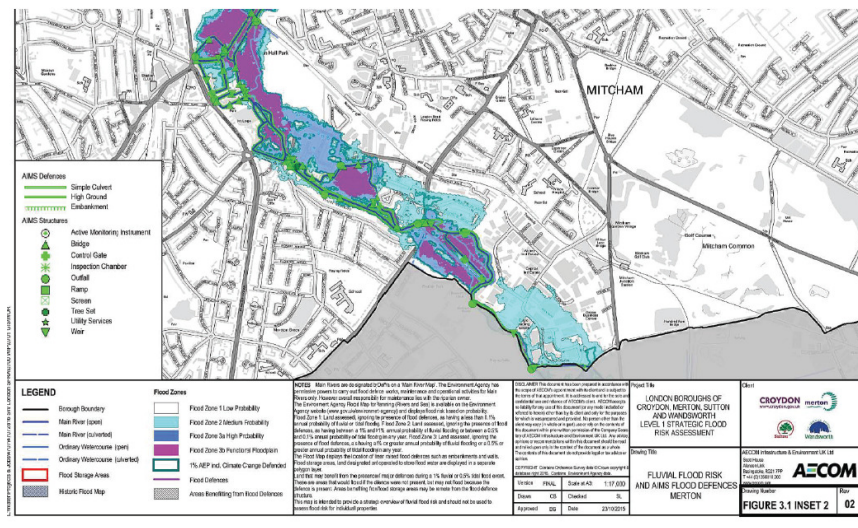
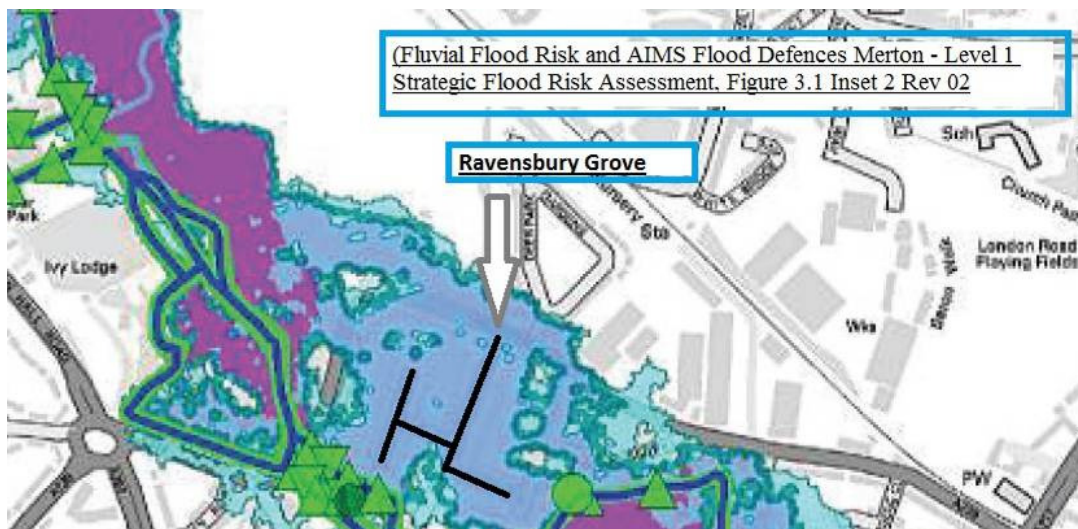
Image above: Views from Ravensbury Court looking West

Further guidance

3.297 New development comprising mainly of houses rather than flats is more likely to preserve the landscape character of the estate.

House designs with tiled roofs tilting towards the street are far more suitable for Ravensbury due to the townscape currently in existence. Retention of this would be beneficial for the overall look of Ravensbury. Employment of mansard roof designs and dormer windows could allow use of roof space as accommodation and therefore reduce need for a three storey height blocking existing views.

Height is a significant factor in maintaining character of Ravensbury due to the tree-line and possible flooding requirements needing between 500mm and 1000mm of additional elevation (Fluvial Flood Risk and AIMS Flood Defences Merton - Level 1 Strategic Flood Risk Assessment, Figure 3.1 Inset 2 Rev 02). If flats are included at all, they should employ the same techniques of including the upper storey in a tiled roof structure, thereby retaining the overall mood of the village-like atmosphere.



3.298 It is likely there is more scope to increase heights adjacent to Morden Road, and where landscaping features allow, for the creation of wider streets with width to height street proportions which enable wider and longer views.

It maybe preferential to have higher buildings along Morden Road than within the Ravensbury area, however wherever the location, excessive height will have a negative effect on the overall character of Ravensbury. We believe that 4 storeys is excessive in height for Ravensbury. This is due to the reduction of views both within Ravensbury, towards Ravensbury Park and beyond the boundaries of the area in question (remember this is referred to as the Ravensbury Village by residents) towards Morden Hall Park, which currently forms a significant backdrop on two sides of the area and along those site lines whose general direction is in the direction of the park. It is our consideration that a building of 3 storeys is the maximum permissible due to the need to retain the overall character of the neighbourhood, and that even in this instance, the upper most storey should be contained within the roof if at all possible. It should be noted that the existing housing in Hatfeild Close has a height that retains the tree-line beyond, but that an additional storey would remove this feature from the townscape with Ravensbury.

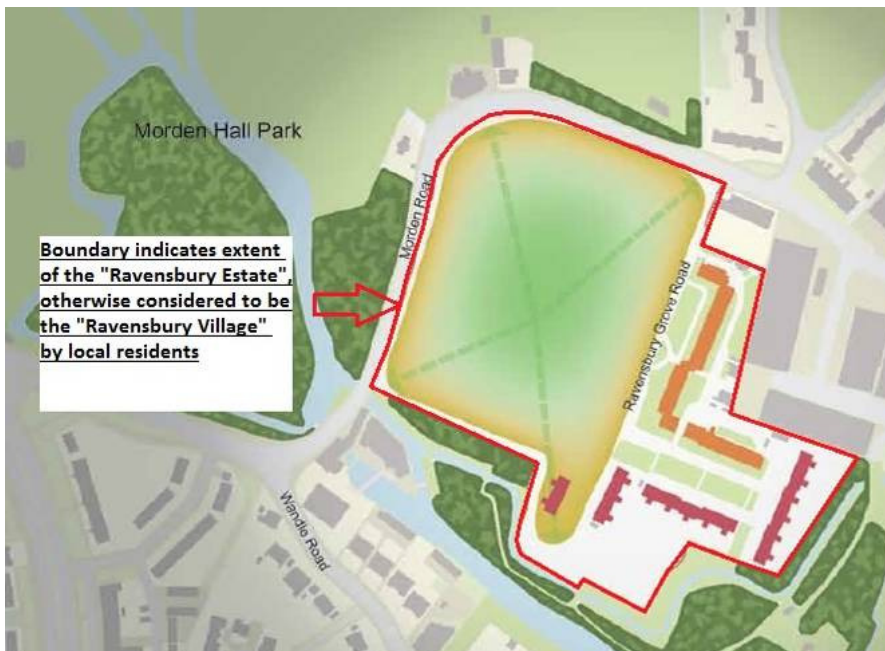


Image above: Extents of Ravensbury Estate/Village



Image above: View along Hatfeild Close with tree-line including Morden Hall Park beyond.

Justification

3.299 All existing buildings are two storey with the exception of the one larger four-storey block of flats. This low rise form is what allows views to the tree-line visible around the estate from numerous locations, which is one of the defining characteristics of the estate's setting. The low-rise buildings also define the estate as a suburban place, although it is considered there is more scope to sensitively increase heights to create more homes so long as views to the trees which envelope the site are not obstructed and the landscape character of the overall estate remains strong.

We think that a key element of Ravensbury lies in the unobstructed tree-line, rather than individual views from choice points within it. The fact that Ravensbury is obviously enveloped by the tree-line gives rise to its significantly green and leafy character. It is important to retain this as this quality of place is very unusual in such a mixed resident demographic; normally this sort of area is reserved for the likes of Wimbledon Village as opposed to our Ravensbury Village.



Images above: Southwest & Northwest corners of Ravensbury Village



Images above: Southeast & Northeast corners of Ravensbury Village

3.300 Redevelopment proposals must therefore give very careful consideration as to the site layout, landscaping, building heights and street widths to ensure this character is essentially retained. Any proposals to increase density must demonstrate how this will not result in undermining the dominant landscape character of the area.

We agree with this statement and would prefer that density increases were kept at the lower end of the range projected due to the existing proposals obviously having considerable impact on Ravensbury.

Page 167 - R8 Building Height Map.

We have annotated the map below accordingly:

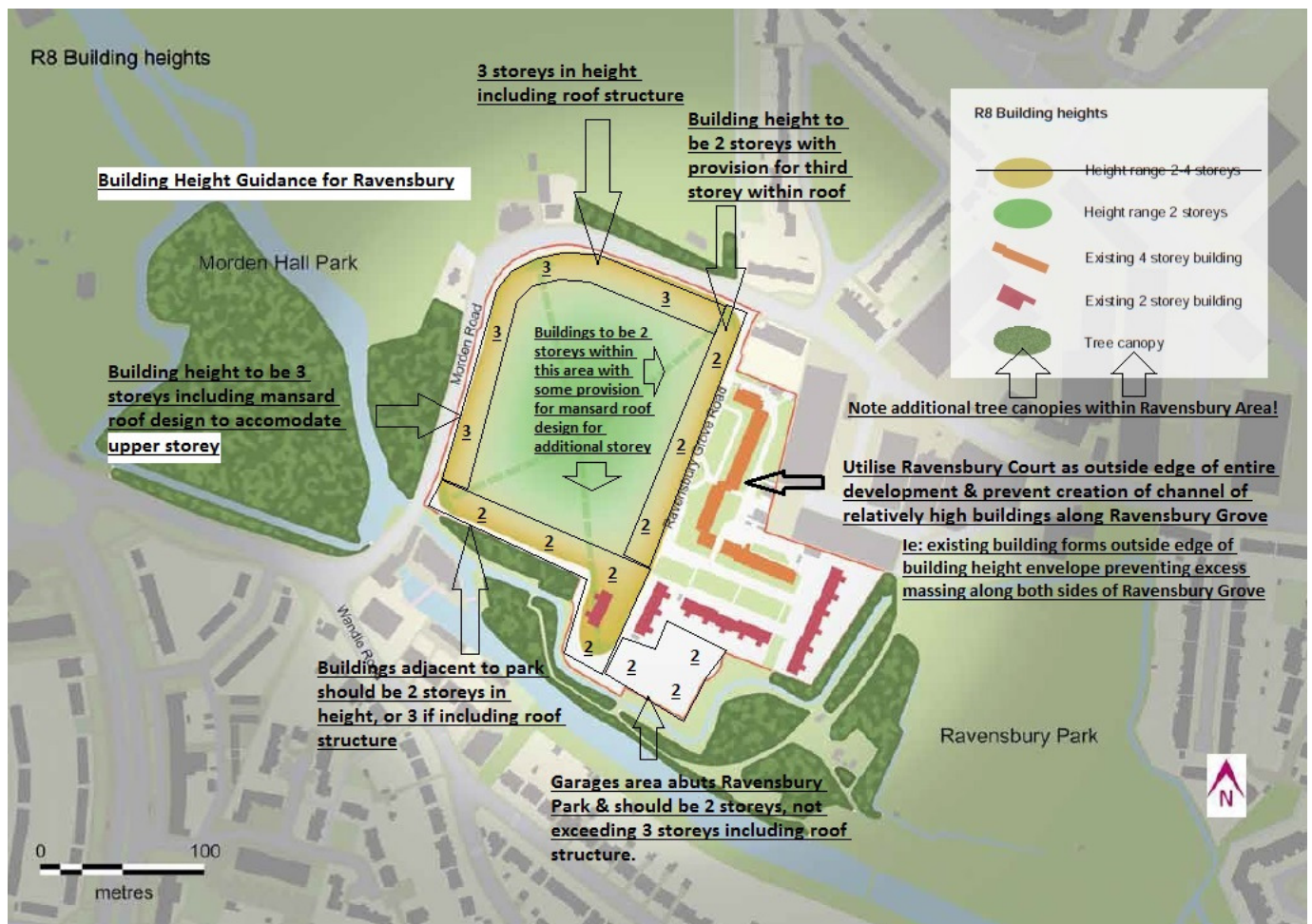


Image above: annotated R8 Building Heights map with guidance on heights proposed

15.0 3D Renders of our understanding of the proposals

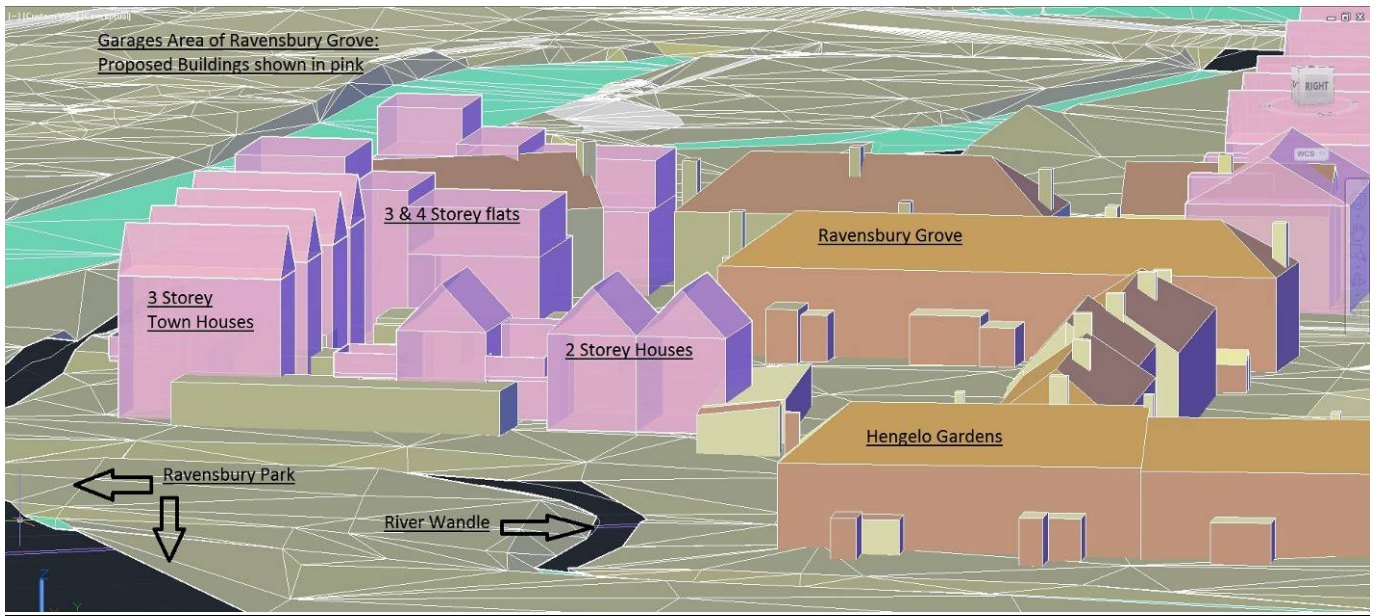




Image above: proposed buildings shown in pink with Orilt homes (etc) shown in white

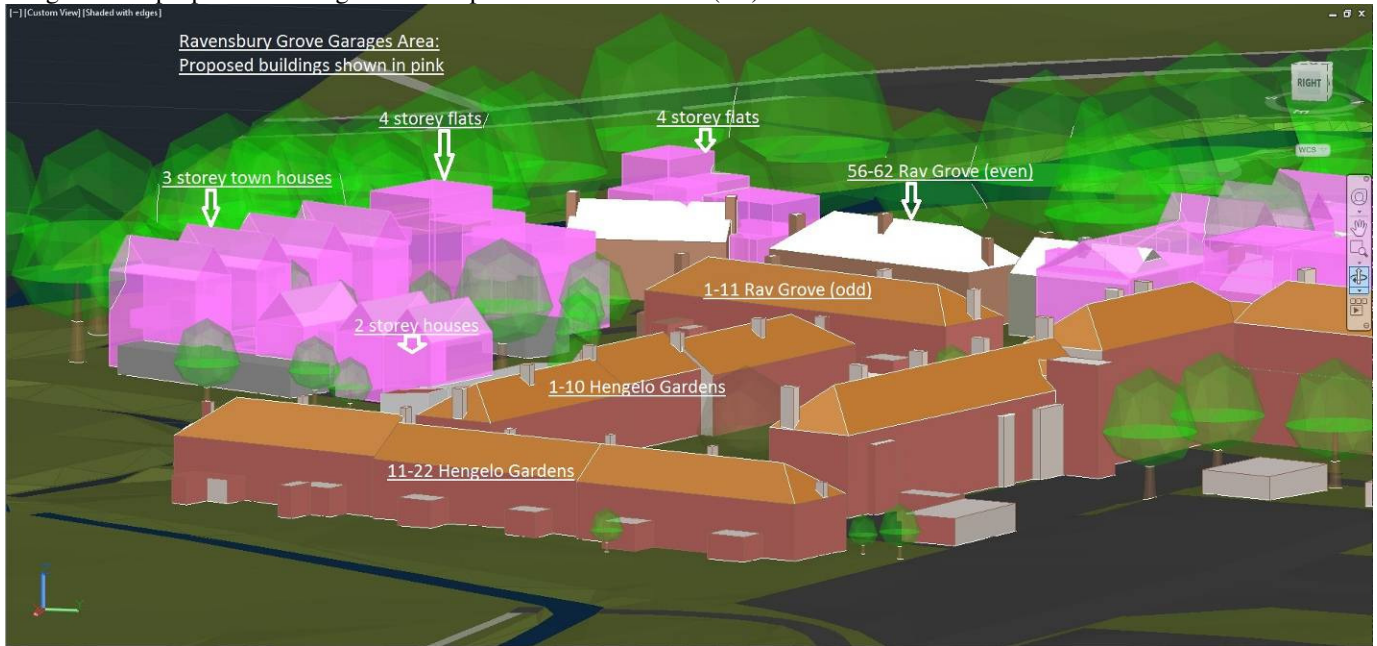


Image above: proposed buildings shown in pink with Ravensbury & Hengelo homes (etc) shown in orange



Image above: Garages area seen from Hengelo Gardens proposed buildings shown in pink

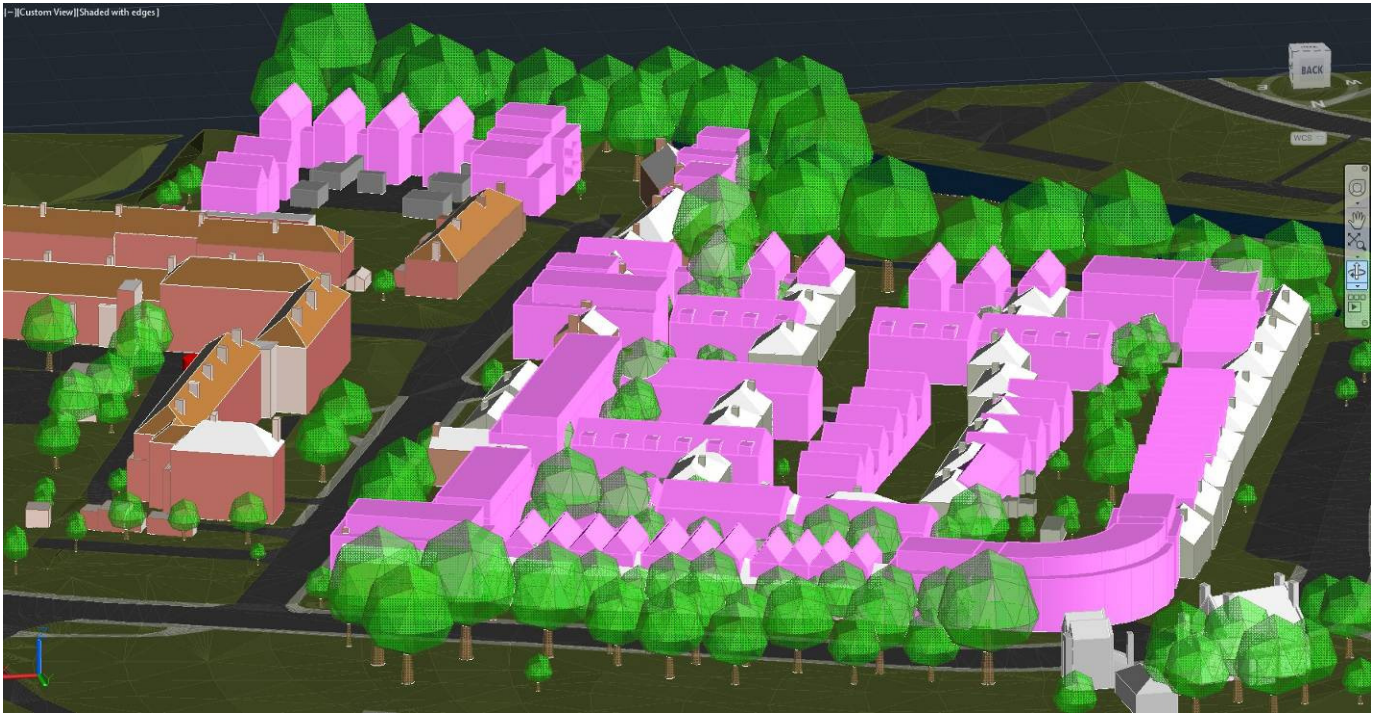
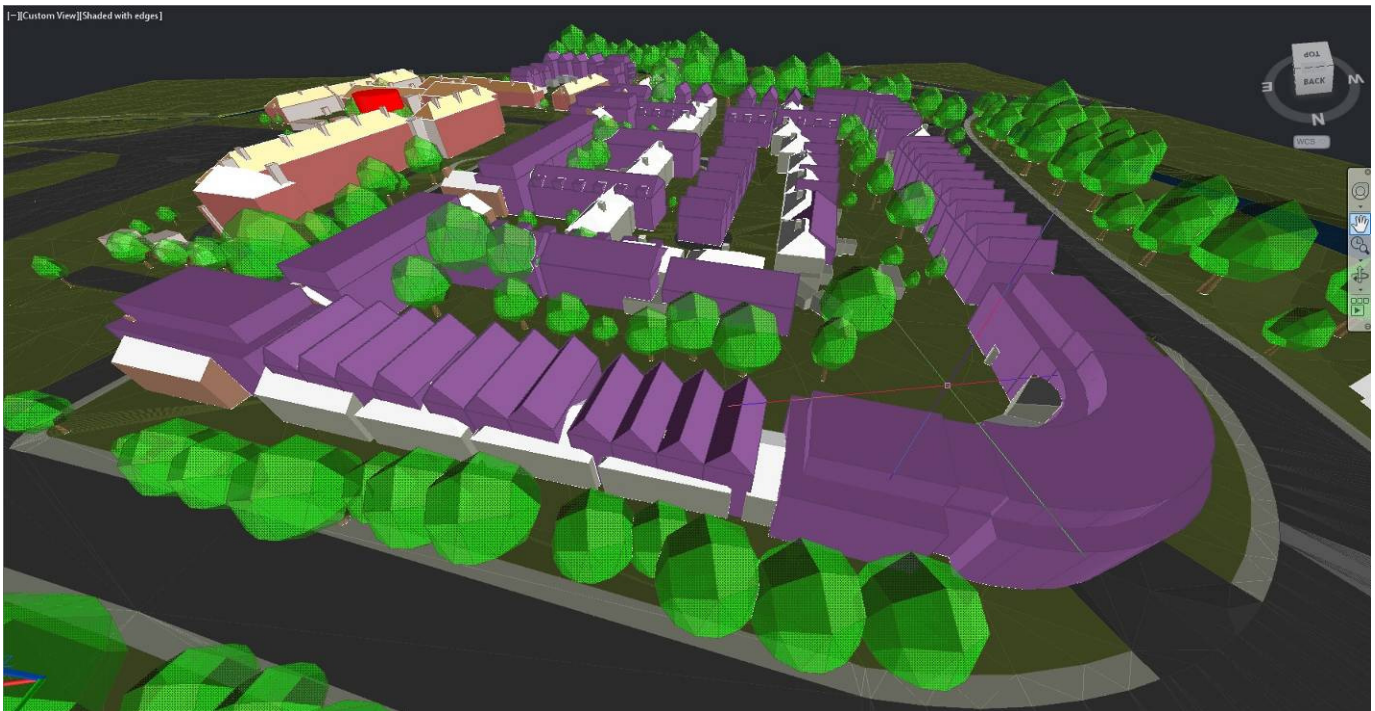
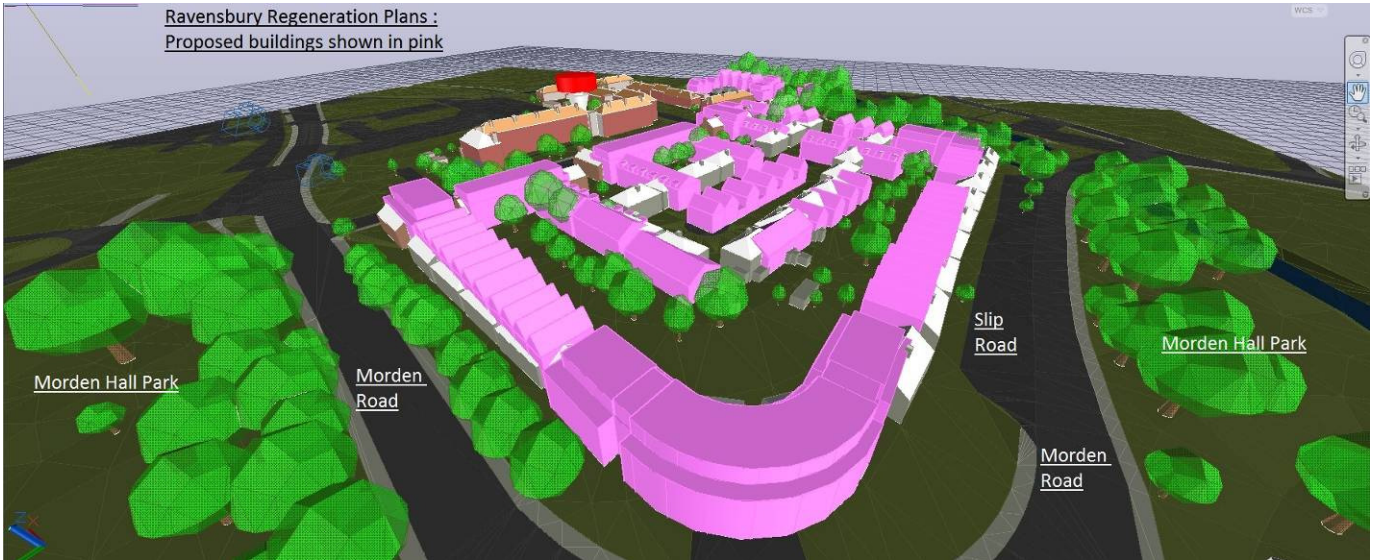


Image above: proposed buildings showing proposed redevelopment density



Image above: Existing buildings showing overall density





16.0 CHMP Reports on Ravensbury Orlit Housing**16.1 Asbestos Surveys**

It is noted that asbestos was only found in the soffit panels of the Orlit houses on Ravensbury. In 34 Ravensbury Grove, one of the recently refurbished properties, these soffit panels were replaced with plastic. However following discussions with CHMP staff, we are unable to ascertain whether the proper asbestos procedures were followed.

The results of the asbestos surveys by Pennington Choices Ltd (dated 15th & 19th September 2014) concur with residents own information regarding Merton Council checking all properties and finding no evidence of asbestos asides from the soffit boards.

16.2 Ravensbury Existing Stock Refurbishment Appraisal by HTA

It is noted that this report makes mention of the Energy Performance Certificates and the potential energy costs to residents. For clarity we think it would be important for Circle to present potential per annum costs of living in the new homes so that residents would have a better idea of total costs and be able to forecast appropriately.

16.3 Structural Assessment of Orlit Homes by Tully De'Ath

Structural Assessment Report of Orlit Houses Revision A 6th November 2014

We note the comments regarding the Chloride Content, namely:

"6.11 GBG tested fifty dust samples for chloride content. These samples were taken from the PRC columns and beams and the in-situ mortar joints. The chloride contents of all seven mortar samples were low at 0.15% or less. Generally the chloride content of the concrete samples were also low at 0.07% or less. There were six exceptions to this however which showed a chloride content ranging from 0.16% to 1.33%. These were on two samples extracted from the secondary beams within 193 Morden Road, three samples extracted from columns within 20 Hatfield Close and a single sample extracted from a primary beam in the roof space of 20 Hatfield Close."

We note the comments regarding the Cement Content, namely:

"6.12 From visual inspections of eight samples, the cement contents vary between 10.3% to 18.7%. GBG consider these are indicative of reasonable to good quality precast concrete. The variability of cement content is considered not uncommon for structures of this age."

We note the comments regarding High Alumina Cement, namely:

"6.13 High-alumina cement (HAC) is an alternative cement mix to Ordinary Portland cement (OPC). It became favourable within the industry as concrete made from it sets rapidly and has a high initial strength. However, under certain conditions it loses strength over time due to a chemical process. As such, it became classified as a deleterious material and was banned from use in 1975. The BRE report on Orlit Houses highlights that many of the precast reinforced concrete elements and in-situ Structural Assessment Report of Orlit Houses Revision A 6th November 2014 11264 Page 14 of 18 mortar stitches of the Orlit houses that they surveyed contain HAC."

6.14 Twenty four samples were tested by GBG across the four properties. None of these were found to contain HAC."

We note the comments regarding Petrographic Examinations:

The results of all the petrographic examinations showed that the concrete appears to be good quality with no obvious evidence of significant distress.

We note the concluding remarks of the Structural Engineers report, namely:

"8.6...There have been no structural engineering concerns identified however and the concrete frames, where investigated, are in a reasonable structural condition. The main concerns highlighted with the BRE research related to concrete beams on flat roofs. The roofs of the Orlit houses at Ravensbury Estate are pitched. It should be recognised however that this conclusion is based on only a limited amount of investigations within a small proportion of all the Orlit houses."

"8.7 If the conclusions reached from the assessment of the 4 Orlit houses were to be reflected in the other 68 properties, then the main issues to consider are linked with the effects of water ingress and the cladding panels."

*8.8 Water ingress can affect the condition of the roof timbers through beetle infestation or decay. As has been seen with the entrance canopies, water ingress can also cause deterioration of concrete elements, especially where reinforcement is allowed to corrode. **To extend the useful life of such buildings it is therefore important to have an effective maintenance regime in place to keep external finishes in good order and to limit potential for water ingress.***

8.9 It is therefore important to keep gutters and downpipes clear for debris so they can work effectively."

"8.10 The cladding panels need to be made good where the joints in the cladding panels have opened up. This will reduce the potential for water ingress. The spalled and cracked corner panels also need replacing and will require additional restraint to tie them back to the structure behind. This will take the form of remedial wall ties and these may also need to be introduced around window and door openings where there are currently a lack of ties. Such an approach will require both a visual and a radar survey of every elevation to be carried out."

8.11 The strategy for repairs to the cladding panels needs to be coordinated with non-structural matters to improve the insulation to the elevations. The cavities which are currently filled with insulation are potential encouraging water to become trapped in the building. Options here include removing the cladding panels so that the insulation can be removed or over-cladding the building with a new rainscreen."

8.12 Similarly the cracking to the window frames should also be made good."

8.13 Although not significant structurally the concrete entrance canopies and support where deteriorated should also be made good and/or removed and replaced with new canopies. The junction of the canopy with the elevations needs to prevent water draining back on to the elevation."

From these results, we conclude that the Orlit homes are essentially structurally sound and require responsive maintenance to keep them in that way.

16.4 Ravensbury Case for Regeneration by Savills

We note the purpose of the document, namely: *"...to set out the findings of the technical work that has been undertaken to date and to demonstrate the economic, social and environmental arguments for and against the "Case for Regeneration" of the Ravensbury Estate, whilst giving equal consideration to reasonable alternative options."*

We also note that:

"... it has been developed to form part of the evidence base for LBM's emerging Estates Plan Development Plan Document (DPD) which will set out the planning policy framework against which regeneration proposals for the Estate will be assessed as part of any future planning application. Therefore, this Case for Regeneration is intended to be an important consideration at the independent examination of the DPD to assist the Inspector in the assessment of whether the submitted DPD is prepared in accordance with legal and procedural requirements and whether the plan is sound, as per Section 20(5) of the Planning and Compulsory Purchase Act 2004 and whether it is, as per the National Planning Policy Framework (NPPF) (March 2012) (paragraph 182):

- “*positively prepared*”;
- “*justified*”;
- “*effective*”; and
- “*consistent with national policy*”.

We feel that the case for demolition with regards to the structure of the Orlit Homes has been vastly overstated relative to the evidence made available by the structural engineers. Savills appear to have missed the concluding remarks within the Structural Engineers report. We suggest that it is possible that the writer of the Savills report was unable to properly interpret the findings of the Structural Engineer.

We note the following paragraph:

"...CHMP are fully committed to continuing to consult closely with residents and other stakeholders."

We would like to point out that this close consultation, performed by the regen team and their professional advisers, has been very arrogant from the outset. Residents have been furious at how CHMP cherry-picked their comments to suit their objectives. To suggest that there are a number of residents who lack confidence in the integrity and conduct of the regen team at CHMP would be an understatement.

We note the paragraph:

"Continuing to take a reactive approach to repairs to these properties as issues arise would involve significantly higher costs to CHMP than considering a comprehensive regeneration of the Estate over a period of 50 years."

However the costs concerned have not been detailed or referenced. Therefore we are unable to qualify these expressions of intent. In fact there are very few facts available throughout this document and it is impossible to quantify or qualify any of the statements. Therefore we find this document lacking in proper evidence.

We do understand the notion of land however, which seems to feature highly in this report. The available land that the Orlit Houses occupy is considerable and potentially very valuable relative to its salubrious location. We understand that an increase in density would bring a great deal of revenue in. To many of our residents this seems to be the only reason why regeneration is being proposed, due to their own knowledge that their homes are structurally sound.

We note that in 6.39, the writer of this report presumes to second guess the Environment Agency's own advice on flood risk. We find this somewhat misguided. We believe the report also references an out of date flood risk plan as this has been recently revised.

We note that in 8.22, the writer suggests that a high level of support has been received for the scheme. However we believe that this support has been chosen somewhat selectively. It would be most appropriate to be able to scrutinise these results. Interpreting results such as these can be something of an art.

We note that in 8.28, it has been impossible to properly validate these assumptions, which is especially necessary considering the nature of Savills acting on behalf of the developer rather than as an independent advisor.

16.5 Ravensbury Urban Design Review

We note the following:

"This study sets out to evaluate Ravensbury against the established principles of good design and does not attempt to make aesthetic or value judgements on the architectural style of Ravensbury. Instead it concentrates on the physical, spatial and environmental aspects of the design and the quality of the neighbourhood that results."

We note the following:

"Urban structure summary

4. Ravensbury is very 'shallow' in terms of walkability to both the urban facilities on Morden Road and the leisure and play facilities afforded by the riverside and other green spaces. This perhaps explains why residents value this seclusion so highly: they have the benefit of a quiet and secluded neighbourhood combined with direct and convenient connections to local facilities, services and recreation spaces.

5. It is important not to make the estate over- permeable as this will undermine seclusion for residents and disperse movement and activity without any real gains in wider connectivity."

These comments are supported by the residents own comments. Numerous residents have described the seclusion as effectively being highly valuable to them. In addition, the residents have also made mention of effectively limiting proposals in increasing permeability. Therefore we support statements 4 & 5 in the Urban Structure Summary.

We note the following:

"...Building facades have been mapped according to the following classifications:

- Active frontage is defined as facades that having both doors and windows of inhabited rooms (ie not bathrooms, storerooms, lobbies or garages) at regular intervals along the street or route to provide surveillance as well as contact and movement between inside and out.*
- Passive frontage is defined as facades with only windows of inhabited rooms but no doorways, providing surveillance but no contact between public and private space.*
- Dead frontage is where the edge to the public space or route is a blank wall or wall that is effectively blank, for instance rows of garage doors or where windows are obscured."*

It should be noted from the maps provided for Ravensbury Court that there is practically zero dead frontage, but instead some passive frontage (ie providing "good surveillance"). We would state that this has proven to be very feasible over time and that this provides support for our earlier statements dismissing the proposal to re-orientate the ground floor flats.

We note the following:

"In summary, most building facades contribute positively to the surveillance, liveliness and activity of streets and communal spaces"

"Layout summary

1. The figure ground plans show that Ravensbury adopts a similar 'perimeter block' pattern of development to surrounding residential areas.

2. There is a strong and consistent correlation between building alignment and the line of the street. This can be seen at the external perimeter of the estate where the building line follows the curved edge to Morden Road as well as the internal perimeter where buildings follow the simple rectilinear street layout.

3. There are few ambiguous spaces within Ravensbury and buildings are used to make very clear distinctions between the communal spaces of the estate and the private spaces of the home.

4. Most building facades contribute positively to the surveillance, liveliness and activity of streets and communal spaces. Houses all face the streets in a consistent manner, providing continuous active frontage with doors and windows. However, the entrances to maisonettes and flats are all switched to the 'rear', reducing contact and activity between buildings and streets.

5. There is very little dead frontage to the main routes of the estate. The spaces with the least intervisibility and surveillance are the garage courts and the pedestrian paths. This issue could be remedied during the regeneration of the estate."

As residents, we agree that Ravensbury has very little wrong with it. We point out that in relation to item 4, the comment about rear facing flats, many residents enjoy the privacy that this design infers. They find it a positive feature rather than negative.

We note the following:

"Should the regeneration option be taken and the number of dwellings increased significantly then car parking might become a serious problem. This will need careful design and management to prevent the streetscape of the new neighbourhood from being dominated by parked cars and also to prevent this becoming a source of friction between new and existing residents."

This is indeed a problematic area. An increase in density will definitely cause a great deal of problems along these lines. However, a number of cars that park on the estate are actually workers from the VW garage. We even have had Ravensbury Grove used as a temporary showroom car park with one resident counting 15 cars from this company.

We note the following:

"Landscape

Areas of private gardens Ravensbury has a distinctive landscape and an open and green character. The whole estate is set within a significant area of high landscape value, with access to an extensive area of parkland and the green corridor of the River Wandle. Even its 'urban' northern and western boundaries with Morden Road face the woodland within Morden Hall Park. Internally, the estate maintains this green and open character. This is created by a combination of design features: wide building to building set backs; grassed communal spaces; mature trees; hedges on plot boundaries and other planting in large, private front gardens. The height of the largest building on the estate, the 4-storey block of Ravensbury Court, is balanced by building to building set backs of approximately 30 metres, the communal open spaces and the tree-lined streets. The line of trees on Hengelo Gardens is particularly impressive and mirrors the height and enclosure of Ravensbury Court on the other side of the street."

"All elements of the landscape are well maintained, with the exception of the frontage to Morden Road between the junction with Ravensbury Grove and The Surrey Arms. Here the houses are set well back from the main road behind a row of mature pollarded trees that form an attractive feature along this stretch of busy road. However, the frontages to these properties are noticeably less well cared for than the rest of the estate. The Morden Road frontage facing Morden Hall Park is set behind a slip road that insulates houses from the main road. These homes are, by contrast, very well maintained. There is no obvious physical reason for this difference between the two Morden Road frontages and may reflect other social or economic factors. The landscape setting, mature trees and other planting are the most significant features of the estate. Together they create a most attractive residential setting, offering quiet and secluded spaces within the estate as well as easy access to the network of green spaces that surround the estate. As part of the green corridor of the River Wandle the trees have ecological value as well as their visual significance and role in wellbeing. No matter which option is selected for the future of Ravensbury, it will be important to protect mature trees and increase tree planting wherever possible."

We find also important to point out that on page 44 of the Urban Design Review, the writer has identified the areas in front of the flats in Ravensbury Court as private gardens. This is quite the opposite to certain CHMP officers attempting to tell residents that these areas were ambiguous. Residents are only too aware that the courtyard is part of their home, as indeed are passersby.

We note the following positive statements about Ravensbury:

"The various open spaces within the estate are well-located in terms of intervisibility and surveillance, meaning that they are well overlooked from buildings and passers by even at distance. There is little or no evidence of graffiti, litter or antisocial behaviour within the estate and residents report a strong sense of community and communality. Physical evidence of this can be seen in the amount of personalisation of gardens and threshold spaces by doorways to the maisonettes and flats."

We also note the summary on page 47:

Quality of the external environment summary

The Ravensbury Estate has a distinctive identity, mainly by virtue of its secluded setting and landscape but also because of the formal arrangement and massing of building groups to define spaces within the estate. The development options are complex on this site, and will mainly be determined by ownership and building condition rather than urban design or landscape. However, there is clearly potential to increase density and building height through various permutations of retention and regeneration.

- 1. Ravensbury has three very different characters: The busy, urban edge to Morden Road; the green and 'rural' edge to the River Wandle; and the secluded communal and private spaces within the estate.*
- 2. High levels car ownership were apparent at the time of the survey but this is unsurprising in a suburban location with a PTAL rating of 2, 'poor'.*
- 3. Should the regeneration option be taken and the number of dwellings increased significantly then car parking might become a serious problem. This will need careful design and management to prevent the streetscape of the new neighbourhood from being dominated by parked cars and also to prevent this becoming a source of friction between new and existing residents.*
- 4. Generally, pedestrians and drivers use the same street spaces to move around and routes feel safe, legible and direct. There are very few pedestrian -only routes within the estate but all could be improved.*
- 5. Ravensbury Estate is set within a distinctive and significant area of high landscape value. Internally, the estate maintains this green and open character. This is created by a combination of design features: wide building to building set backs; grassed communal spaces; mature trees; hedges on plot boundaries and other planting in large, private front gardens.*
- 6. The landscape setting, mature trees and other planting are the most significant features of the estate. Together they create a most attractive residential setting, offering quiet and secluded spaces within the estate as well as easy access to the network of green spaces that surround the estate.*
- 7. The lack of formal play spaces within the estate would not appear to be a problem for residents. This is partly because of the number and size of private gardens but also because Ravensbury Park offers a very accessible, well-equipped play area. The parks and riverside paths also provide excellent opportunities for leisure and activity for all age groups.*
- 8. There is little or no evidence of graffiti, litter or antisocial behaviour within the estate and residents report a strong sense of community and communality.*

We note the main Urban Design Review summary:

The Ravensbury Estate has a distinctive identity, mainly by virtue of its seclusion and landscape setting but also because of the formal arrangement and massing of building groups that define spaces within the estate. The development options are complex on this site, and are likely to be determined by ownership, viability and building condition rather than urban design or landscape.

1. The Ravensbury Estate is located in a relatively isolated part of the Borough, as reflected in its PTAL classification of 'poor' (2).

2. The extensive parks, riverside open spaces and other barriers surrounding the estate make it an enclave and there is relatively little that can be done to integrate Ravensbury better into its wider area.

3. This relative isolation creates, on the one hand, a quiet and secluded residential neighbourhood but, on the other hand, restricts movement options for residents and is likely to encourage more trips to be taken by car.

4. There is some scope to improve access on foot and cycle through the process of regeneration.

However, it is important not to make the estate over-permeable as this will undermine seclusion for residents and disperse movement and activity without any real gains in wider connectivity.

5. Analysis of building facades reveals that the entire external and internal perimeters of the estate have active or passive frontages providing good levels of surveillance. Conversely, there is very little dead frontage with the exception of the edges to garage courts and the pedestrian paths that are not overlooked.

6. The density of the estate at 43 dwellings per hectare (dph) is similar to surrounding development of the same period. However, this is low by modern standards, even in a suburban location, and there is potential to increase density and building height through the various permutations of retention and regeneration.

7. Ravensbury Estate is set within an area of high landscape value. Internally, this green and open character is maintained by the presence of grassed communal areas, mature trees and other planting. Together they create a most attractive residential setting, offering quiet and secluded spaces within the estate as well as easy access to the network of green spaces that surround the estate.

8. It is important that mature trees and riparian landscape are protected and improved. This is most likely to be possible with masterplan options that combine retention and regeneration rather than complete redevelopment.

9. There is little or no evidence of graffiti, litter or antisocial behaviour within the estate and residents report a strong sense of community and communality.

10. High levels of car ownership were evident at the time of the survey.

11. Currently, a large proportion of the houses have on-plot parking with the rest being provided on street. However, car parking may become a serious problem should regeneration options significantly increase the number of dwellings on the site. This will need careful design and management.

12. The Building for Life 12 assessment for Ravensbury results in 8 'greens' out of the 12 questions.

This Urban Design Review has merely repeated what the residents have been saying from the start of the regeneration consultation: that Ravensbury is about as perfect as you're going to get in terms of environment for a broad demographic within Merton.

Point 4 supports the residents argument regarding limited permeability preserving the benefits of the Ravensbury area. Point 5 supports the good overall design of Ravensbury, that it is not actually in need of fixing in the first instance. Point 7 & 8 further illustrates just how valuable this area really is, in terms of a personal level and in terms of the immediate environment. Point 9 points to the fact that the community at large are significant in their sense of neighbourhood, and that Circle's lack of understanding and arrogance has damaged the community. The residents believe that this is exactly what they want to do - divide and conquer: push through a regen and get their return on investment. Point 12 identifies the very high quality of living that Ravensbury residents have in their current environment.

17.0 Conclusion:

In summary, we feel that in Ravensbury the case for regeneration on the basis of structural faults or environmental deficiencies has been overstated from the outset. A variety of angles have been thrust towards residents over the past few years of consultation and many of these assumptions in favour of regeneration (poor design, unhealthy environments etc) have now actually been negated by CHMP's own reports.

Structurally, the Orlit homes are essentially sound - on the proviso that normal preventative maintenance is carried out appropriately. This is true for any house or structure. We have found that a degree of neglect in regards to proper repairs and maintenance seems to be in effect around Ravensbury. We can only summarize that even if this is the case around Merton as a whole, the only winner in Ravensbury will be the push for demolition - the actual situation is effectively deleterious for residents. Allowing properties to become run down and not responding properly to maintenance only generates apathy and negativity on the part of the resident. Some will feel inclined to move out, others may stay nonetheless with a kind of Blitz spirit, and others will feel resigned to their fate and feel the need to either toe the housing association's line or quietly ally themselves with them. Even long term residents feel they should keep quiet in case expressing an opinion compromises their rent or allocation if the regen still goes ahead.

CHMP continuously refuse to internally refurbish many properties on Ravensbury, so this is proving frustrating for residents. New kitchens and bathrooms are the minimum that they should expect. Proper responsive maintenance should be the order of the day, with internal refurbishment such as replastering of a sitting room practically a matter of course. It seems that delivery of proper maintenance services is uneven, with some residents getting a reasonable service and others getting absolutely nothing at all. This kind of service merely pushes residents to give up and accept demolition, so on Ravensbury we can only believe that it is somehow intentional.

If regen is to go ahead, make residents true stakeholders: give them the opportunity to rebuild their homes and community, sitting in on meetings with architects and controlling the journey whilst being spoken to with respect and courtesy. If you offer them like for like at the start, make sure it's still on the table later on.

If a housing association truly wishes to renew the housing stock, then its officers would behave decently and demonstrated true people skills rather than the anti-community skills that seem more evident.

We believe that there is plenty of truly brownfield land (as opposed to Lord Adonis' description of council housing as brownfield) within and on the margins of Merton. These areas should be a priority for Merton's housing targets. Ravensbury is a prime example of a quality environment that should get a proper maintenance service. Ravensbury should be an icon, a blue print for the design of a residential area, not an area presumed deficient at the start, whose residents are dealt with in an unacceptably arrogant fashion by the housing association's regen team and their associated professionals.

Christopher Holt, Chair RRA.

Ravensbury Residents Association.

Ravensbury Residents Association

9th March-2016

We, the undersigned, support Ravensbury Residents Association response to Merton Council's Draft Estates Plan

Signature	Name (Please Print)	Address
1 Mrs Blogg	DAVERILE	16 Hengelo Gardens
2 Mrs Lambourne	DOLL	13 Hengelo Gardens
3 Mrs. Isak-Sene	Kotonywa	1 Ravensbury Grove
4	NIEDZWIEDZ T.	11 RAVENSBURY GROVE
5 R. Jones	A. SLEIGHT JONES	7 Ravensbury Grove
6 M. Bullman	BULLMAN	9 RAVENSBURY GROVE
7	G. COSTA	62 Ravensbury Grove
8 ALISTA	Nicole COSTA	58 Ravensbury Grove
9 J.R. Sadler	FRANK SADLER	"
10	GEORGINASTADLER	56 RAVENSBURY GROVE MITCHELL
11 J. Sadler	Jobi Sadler	56 RAVENSBURY GROVE MITCHELL
12 A Ramirez	Andrea	56 Ravensbury Grove Mitchell
13 ESTHER	ESTHER	54 Ravensbury Grove
14 J. Chambers	J. CHAMBERS	52 Ravensbury Grove
15 P. Murphy	S Hatfield	4 HATFIELD CLOSE
16	S. Duke	5 HATFIELD CLOSE
17	T. WILLIAMS	6 Hatfield Close
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Ravensbury Residents Association

10th March-2016

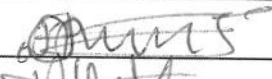
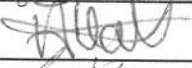
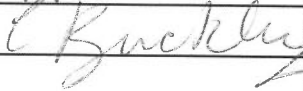
We, the undersigned, support Ravensbury Residents Association response to Merton Council's Draft Estates Plan

Signature	Name (Please Print)	Address
	T. Boake	30 Ravensbury Court
	R. Hilleard	25 Ravensbury Ct
	S. ANTON GALAN	23 RAVENSBURY COURT
	D. H. H. H.	71 Ravensbury Court
	K. BROWN	20 Ravensbury Court
	A. Elliott	18 Ravensbury Court
	Joe Regan	13 RAVENSBURY COURT
	M. G. G. G.	16 RAVENSBURY COURT
	Melon	7 Raven Ct
	R. Rendall	35 Ravensbury Ct
	SARINA AUSTIN	40 Ravensbury Court
	A. A. A. A.	45 RAVENSBURY COURT
	A. A. A. A.	49 Ravensbury Court
	A. KHAN	51 Ravensbury Court
	S. P. ESEKODY	56 RAVENSBURY COURT
	L. ELLIOT	6 Rutter Gardens
	Kellie Moore	12 Rutter Gardens
	TRACY WILSON	3 HATFIELD CLOSE
	Ece Chambers	7 Hatfield Close
	K. POWELL	8, Hatfield Close CR4 4DT
	Clare Evans	9 HATFIELD CLOSE
	M. J. J. J.	11 Hatfield Close CR4 4DT
	D. J. J. J.	13 Hatfield Close CR4 4DT
	D. J. J. J.	15 HATFIELD CLOSE CR4 4DT
	KOMAL MASOOD	17 HATFIELD CLOSE CR4 4DT
	J. Holmes	19 " "
	D. Beardwell	20 Hatfield Close
	J. WILSHIRE	14 Ravensbury Grove
	P. MUSSELWHITE	42 Ravensbury Grove
	S. 2. 2. 2. 2.	46 RAVENSBURY GROVE
	DICKSON NTIM	21, HATFIELD CLOSE
	Mick Charles	30, RAVENSBURY GROVE

Ravensbury Residents Association

17th March-2016

We, the undersigned, support Ravensbury Residents Association response to Merton Council's Draft Estates Plan

Signature	Name (Please Print)	Address
1 	A. Ofori-Attah	33 Ravensbury CT - CRUDDON
2 	A Hall	43 Ravensbury Court
3 	C Buckley	47, Ravensbury CRT MITEHAM
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All Resident's Associations responses

**Stage 3 Consultation – Pre-Submission
Publication**

December 2016 – February 2017



**High Path Estates' Local Plan 2016/17:
High Path Community Association Committee's Summary**

The following is a summarisation of comments by the *High Path Community Association's members regarding the document: "Estates' Local Plan Winter 2016/17".

2. Background, Key Drivers, The Case For Regeneration, The Vision, Urban Design Principles

It is fair to point out that the residents' views was requested by Circle Housing Merton Priory (CHMP) at regular intervals since the idea of an upgrading of the estate was proposed around 2013. Complaints about the repairs and maintenance programme had reached a tipping point and, as social tenants were voicing comments such as "tear it down", "pull it down and start again", in relation to a quick fix for restoring a well rounded aesthetic pride to the area, we need to note that it was never clear what this work on the estate meant. The latter remark has been a constant theme throughout this entire process and moving forward it is hoped that the Secretary of State and whomsoever is heading up strategic positions for the entire timeline of the estate will bring about an energy to **1regenerate** an area such as those allocated (High Path, Ravensbury and Eastfields) for new works.

Pop up exhibitions on the estate were strategically placed and passers by were asked their views as to how they felt about the state of the area.

Fast-forwarding to when CHMP's draft masterplan was delivered (late Summer 2014) it had the unfortunate effect of clashing with Merton Council's 'Have Your Say' document. These two major documents which would ask a different set of questions but nevertheless wanted residents opinions on the ideas posed caused much confusion among the majority. As a result residents questioned who was delivering the overall improvement to the area and when one considers that a

proportion of residents are still under the misguided impression that Merton Council still own and manage the estate then the general view is of bewilderment, and a overwhelming sense of no control of the entire process. Set within this is the view of the homeowners (leaseholders/freeholders) who have felt detached from the social tenants since the transfer of stock and even alienated despite the fact that they (leaseholders) have paid service charges since the transfer of the land.

If this is placed within the context as to why the regeneration was called upon (a general improvement to the internal/external areas of the estate) and as to how this came about (the poor repairs and maintenance programme by Circle Housing Merton Priory and the suspension of the Decent Homes programme) then the necessity of such a wide-spread programme could be argued is one that the residents did not request. The general opinion is that if CHMP managed their contractors appropriately then the estate might well be considering a refurbishment of the buildings or a partial regeneration at best. This view is taken when one considers the delivery of its repairs and maintenance programme which was mismanaged mainly because of the poorly executed procurement process and it also coincided with allegations of fraudulent behaviour by CHMP's contractors (Keepmoat) which in turn evolved at the time of the suspension of the 'Decent Homes' programme by Merton Council's Regeneration member. Bringing also to bear down heavily is also the daily upkeep of the estate by the cleaners and caretaker

CHMP's document/s from start to finish - if you engaged with the process - was clear: regeneration was the outcome that they wanted to deliver. They felt that this was best for all concerned. However Merton Council's document asked what variation of the scheme the residents wanted:

We are minded to note that a regeneration is needed so that those who are living in overcrowded dwellings are rehoused suitably. Also the performance of some buildings, specifically the tower blocks are not in keeping with modern day standards and in some homes, specifically where overcrowding is evident this leads to an extensive build up of condensation and damp which in turn leads to a lowering of a resident's general state of health (physical and mental well being).

The 'Estates Local Plan' refers to the Equality Act 2010, specifically "**2.37. The Equality Act describes a disability as a physical or mental impairment which has a substantial and long-term adverse effect on ones ability to carry out normal day- to- day activities. All development proposals will be expected to have consideration to people with disabilities as de ned by the Equality Act 2010. This includes physical and mental conditions - for example, dementia.**"

We anticipate a wholesale improvement on the woeful promises (eg '91 Promises' and '10 Commitments') made by the resident provider in this regard as it is noted in the draft document of the stock transfer "**WOULD MERTON PRIORY HOMES DO ANY WORK IN THE LOCAL COMMUNITY?**"

Yes.

Merton Priory Homes would work closely with residents, local councillors and public bodies like social services, education, the police, the health authority, GPs and voluntary agencies to help local communities tackle problems and improve the quality of life for residents. (Consultation on the proposal to transfer Merton Council's homes to Merton Priory Homes - Appendix 3, 2008/9)

We have noted that as CHMP have not engaged with Merton NHS CCG as a community partner to the level we deem appropriate for a project of this magnitude, there is a concern on the part of not just the community on the whole and the services we use, if it is assumed a near tripling of the density of the population is to go ahead as preferred that in this context, we have a heightened concern for the increasing population of the elderly and the indigenous vulnerable cohort. Moreover CHMP have sought to remove staff for this particular service last year (June 2016) as it was not considered appropriate or within their remit as a resident provider and this was partly due to their inability to engage with the areas they covered (East and West Merton aka Merton Central). We need also to point out that in view of financial challenges in adult social care and the mitigating financial issues for the NHS in general then a more robust level of discussion needs to be had with the respective agencies related to health and wellbeing in our community.

It is difficult to give a fair appraisal of the 'Estate Local Plan's Urban Design Principles as we have been told by architects on the events on numerous occasions that the finer details are yet to come. With that in mind we are concerned as to the general height of the build and most especially the 'right to light' aspect. Open space within the plans show little in the way for what we currently have and if the density is to be propelled forward as intended (608 homes to 1,600 homes) then the whole estate will be making a mad dash to the proposed central park for their uptake of vitamin D.

As with most new builds the building design is typical of the London vernacular and though we empathise with PRP's desire to have a modern outlook we regard this as an opportunity to harp back to the past and refer to the curves of yesterday for the facades of the buildings instead of the cold, Brutal preference. A way around this would be to work with another company of architects as PRP seem intent on stamping their Goldfingersque footprint around the city. Most of the staff of said company have been laissez-faire and uninvolved when residents have opened up the conversation in public events to different designs to their own and this has not been lost by the indigenous population. Size of proposed dwellings has brought with it some contentious thoughts and this needs to be agreed upon and the task repeated because a number of residents have had misgivings as to the authenticity of surveys conducted by the likes of Savills.

In accordance with this are the materials for the build and given that we are supposedly a long way off we would ask that in the forthcoming workshops the

leading designers look to incorporating sustainable materials for the proposed works. We say this because convention says that as this is a multi-million proposal the big companies will utilise the usual mediums to frame our new homes. This is an opportunity to work with materials and train residents within the process. If the intention is to rebuild the estate for more people and have homes that perform holistically then why not be forward looking and opt for different materials such as lime and straw? Our concern is that because of the urgency to appease central government and meet the targets for housing those in need that this will be a big moment lost. Working with what we know is the prevailing narrative amongst builders of this type of instead of being groundbreaking.

The raw materials are there and readily available and presently going to waste - residents living in these homes will have lower fuel bills and the surrounding area will benefit with the reduced offset of pollution should we decide to build with such organic materials.

We commend the retaining of mature trees in the area as this not only adds to the 'greenspace' aesthetic but also enhances the clean/environmental buffer for air pollution off the nearby highways.

Last month we formed with other neighbouring resident groups the 'South Wimbledon Enhancement Plan' as the area is not only bereft of a neighbourhood plan but also any localised character. Heritage is important to those that live here and we are disappointed at the rapid advancement of planning for some heinous examples of design in the area. If 'Rose Cottage' in Hamilton Road is to go the way as planned then epic historical draws for outsiders will never happen and so again this is an opportunity to funnel avenues towards the nearest transport hub or currently quiet Merton Abbey Mills. Containing the estate (as it currently is) and minimising traffic flow will give the new estate a homely feel and residents will have a place of community. The High Street will still act as a fulcrum for those travelling east to west (or vice versa) but the commercial premises must reflect and retain this connection with the estate. The estate is not to be a hub for the masses ala Oxford Street but we are mindful as work is nearing completion on the former Brown & Root building in Colliers Wood and the desire to increase the aesthetics by the SWEP in the area on the whole it would be preferred if ownership of such commercial venues was pitched at independent proprietors. The connectivity to the area will then ease the transition to Wimbledon's Business Investment District and as Colliers Wood and us are twinned as an area of intensification then the fluidity will be simpler. A plan for working with the Council with SWEP can easily be formulated to keep everyone happy and if the opportunity to employ local residents in such establishments was to come about then this would be beneficial all round: residents will have less of a desire to work in 'town' and community spirit will be enhanced. A good example of this connectivity is 'Battersea Square' where residents are forced due to a lack of regular public transportation to socialise nearby and this enhances the neighbourhood both financially and collectively.

Given the fact that Crossrail 2 has not been reignited as a topic for sometime and the Tram extension to the area has gone quiet too we would say that keeping certain corridors of access open to change and, flexibility. Locking in plans now will be difficult to change later and this is very evident in the road en route to Colliers Wood (near to the station there is always a bottle neck throughout this journey and this ruins what could have been a pleasant ride if the small parade of shops on the left were set back nearer to Wandle Park).

Executive summary

As a community we endorse a regeneration but this needs to be delivered in a manner that is in keeping with the implicit wishes of the community on the whole. A good and sound example of this can be found in the paper: *Estate Regeneration National Strategy, December 2016 Department for Communities and Local Government* .

5. Residents' involvement in the management of estates

The ongoing management of the estate is vital to its sustainability. Residents should have the opportunity to participate in the ongoing management of the regenerated estate. In some cases this may be through a formal tenant or resident management organisation or through a resident- led board. Ongoing opportunities should be provided for residents to influence decisions and develop the necessary skills to take on more responsibility, if they choose.

Where elected or self-selected residents represent the estate, landlords should provide them with the resources to communicate and engage with all residents to ensure their representative approach is inclusive. This could include a place to meet or computers for preparing and distributing communication materials.

Estate regeneration schemes can play an active role in identifying community facilities which can be owned and managed by resident and community groups. Where community assets are run by the community, people are more likely to have an active and sustainable voice in their neighbourhood.

It is also important to undertake post-occupancy evaluation to understand the impact of regeneration, and to demonstrate an ongoing commitment to residents by acting on the results of any evaluations. This maintains trust with the local community, and encourages social sustainability and community cohesion.

As important as the aforementioned is the need for clear and transparent dialogue between the resident provider, local authority and the residents. In particular is the Council's recent proposal with Harris Academy to build a secondary school on the area of South Wimbledon. We oppose such a venue as not only is it too small to accommodate the needs of its pupils but the proposed regeneration makes no mention of it and all affected stakeholders are wrought with anxiety, exacerbated by the impact of such a venture. Married to this is the large contingent of disadvantaged young people who attend the local primary school that live on the estate and the neighbouring district therein it is folly of the Department of Education and smacks of desperation on the part of the Council to entertain such a proposal. If any of the adjacent stakeholders considered such a proposal it is because they were not aware of the massive undertaking by the resident provider and as such the general conversation was as disjointed as we had previously noted in the consultation back in 2013. The head teacher of the local primary school was

unaware of the proposed increase of the density of the estate as was the manager of the Resource centre which houses groups for those with learning difficulties and the resident provider is unaware of the significantly high proportion of disadvantaged youth in the area and to compound this Harris Academy plead ignorance regarding the proposed regeneration on the whole.

The estate has had to endure a consistently bad level of service over the entire period since the stock transfer took place and as a result this has built a very high level of mistrust. Rumourmongering and disgruntled members of staff whose conditions proliferate their lackadaisical approach to their toil does not help matters either when residents approach or telephone staff earnestly to assist with queries.

When you set this out in the mix of the 'Residents Offer' and the pitiful financial remuneration if residents want to sell to CHMP and or the loss of footprint on the new homes for the freeholders then the 'plan' on the whole does not look enticing to many. The tenants may acquire free 'white goods' but what assurance have they got as well if they are tied into a district heating system which might well offset the 'freebies' given the prolonged tie ins that other new builds have had to withstand. The Council needs to address the latter aspect robustly as we are minded to say that whilst this is a policy imposed upon them from a greater Central London administrator the local authority must implement a charge that benefits the resident as opposed to any other agency and that includes the resident provider. An example of bad practice has meant that an estate in London (Myatt Field) has been locked into a deal which has them tied in with an energy provider for decades and residents were misguided as to the longevity of the contract and now they are having to experience long periods of no heating or hot water as contractual obligations mean no one wants to admit liability or accountability. It is with this in mind we refer to:

EP H6 and h) The feasibility of CHP and district heating must be investigated. As a minimum this should include:

- (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 ongoing engagement with key stakeholders associated with the potential secondary heat sources such as Transport for London and the Environment Agency 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 Mayors Energy Hierarchy when compared to the existing buildings on the estate. Outlining how improvements have been achieved according to the hierarchy of; improved building fabric, increasing the efficiency of supply and renewable energy generation, and how this compares to existing development on the sites.

**High Path Community Association' is a constitutionalised residents group based on the High Path Estate, South Wimbledon, SW19, which works with the following community partners:*

(alphabetical order) Baitful Futuh Mosque, Catch 22, Circle Housing Merton Priory, Cooperative Foods, Duke of Edinburgh Awards (Merton), Healthwatch Merton, High Path Resource Centre, Independent Merton Greenspace Forum, Merton CIL, Merton Council, Merton Abbey Primary School ('Governors' and 'Friends'), Merton Heritage Forum, Merton Tenants Residents Federation, Merton Voluntary Service Council, Prostate Cancer UK, Safer Neighbourhood Panel (Abbey ward), St John Divine Church, Sustainable Merton, WIFFA (West Indian Families and Friends), and YMCA.

¹regenerate

(verb)

1. (of a living organism) regrow (new tissue)
2. bring new and more vigorous life to (an area or institution)

(adjective)

1. reborn, especially in a spiritual or moral sense

Origin from Latin *regeneratus* 'create again'

Concise Oxford Dictionary

²caretaker

(noun)

1. a person employed to look after a public building

derivatives of care - feel concern or interest and **take** - reach for and hold with one's hands. Carry or bring with one; convey or guide.

Concise Oxford Dictionary

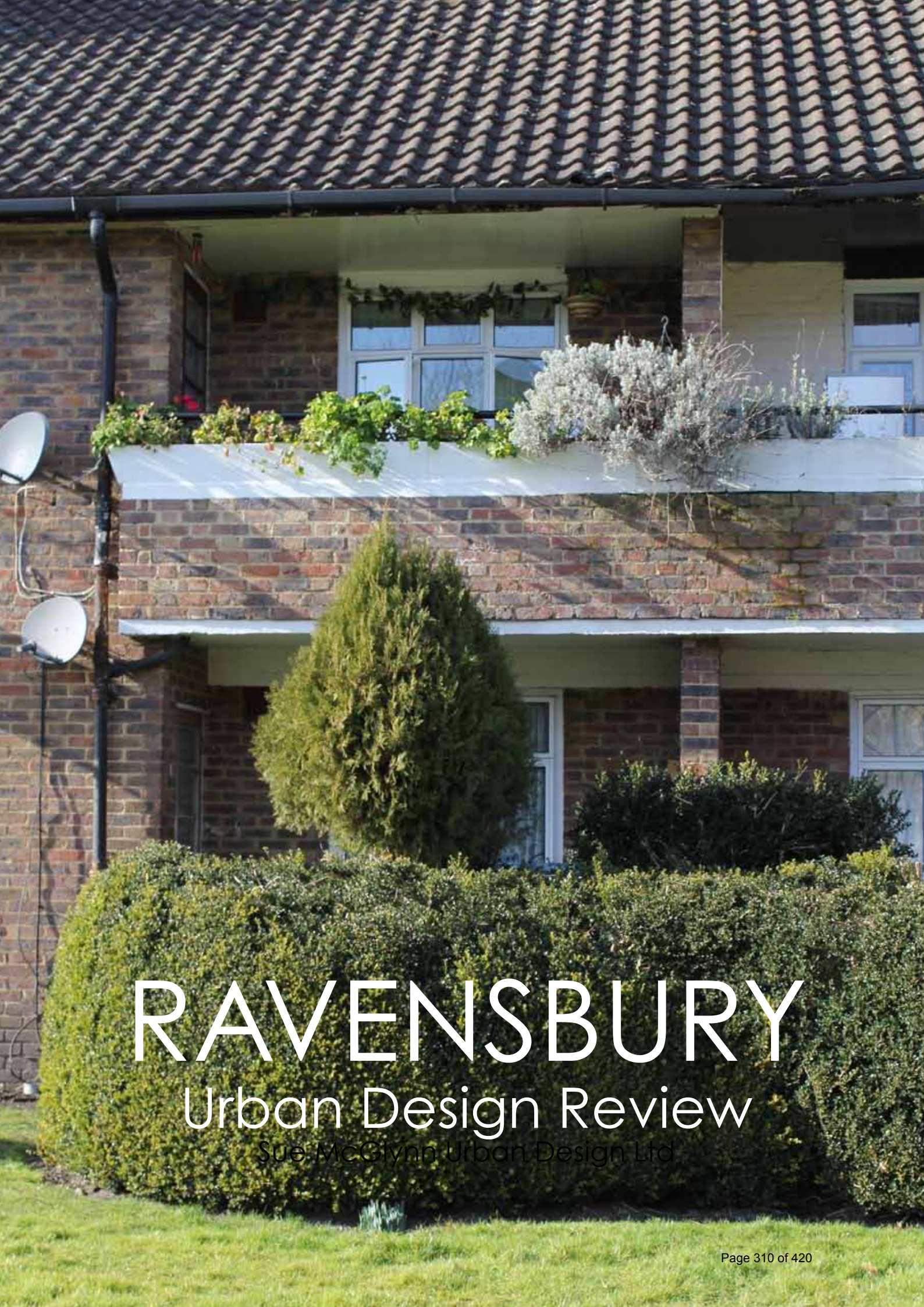
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RAVENSBURY

Urban Design Review

Sue McGlynn Urban Design Ltd

This document was produced by Sue McGlynn Urban Design Ltd for Circle Housing Merton Priory. Released March 2015. All graphics and images produced by Clare Baker and Garry Hall, and © SMUDL unless source given.

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About the project

Background | About the study area | Testing the case for regeneration

Background

In 2010 the London Borough of Merton transferred all of its housing stock to Circle Housing Merton Priory following a successful ballot of tenants. Some 9,500 former council homes were transferred, including the Ravensbury estate.

The Transfer Agreement included a requirement that Circle Housing Merton Priory bring all the transferred homes up the Merton Standard, effectively 'Decent Homes Standard' improvements plus some locally agreed enhancements. The Agreement required that all these works be completed by December 2015.

The Merton Standard works are well advanced across Merton, with over two thirds of the improvement works completed. However in

preparing the plans for the delivery of the works to the outstanding homes, Circle Housing Merton Priory have come to doubt the value for money case of investing in what are, in some instances, homes and neighbourhoods of a very poor standard. As a result Circle Housing Merton Priory is currently exploring regeneration-based alternatives for three specific estates, including the 192 home Ravensbury estate.

Circle Housing Merton Priory see two main options:

1. The continuation of the Merton Standard works as originally planned
2. The regeneration of Ravensbury including the demolition of some homes and improvement of others to provide a total of 396 homes.

About the study area

The Ravensbury Estate is located between Mitcham and Morden, towards the south east of the London Borough of Merton. The area has a predominantly suburban and residential character, typically with 1,2 and 3 storey houses, mainly of the inter-war and post-war period. The nearest district centre to the estate is Morden, just over 1 kilometre to the west - about a 15 minute walk. A small parade of shops is located on Morden Road, opposite the estate.

Morden Road runs along the northern and western boundaries of the estate and The

River Wandle forms the southern boundary. The river valley creates a sequence of major green spaces that surround Ravensbury on three sides: Morden Hall Park, Ravensbury Park and Watermeads Nature Reserve. Mitcham Common and Golf Course lie about 1.5km further east. These extensive green spaces and the mature trees of the historic park of Morden Hall give Ravensbury an attractive setting and feels very much to be at the 'soft edge' of London. The only visible built-up edge to the site is at the north-eastern corner where there is a small estate of business units and to the north Deer Park Gardens.



Above: Merton in the wider London context: Map showing the location of Merton and Ravensbury in relation to the city.



Right: Site context map.
Source: HTA Design LLP

Testing the case for regeneration

As part of their regeneration plans for Ravensbury, Circle Housing Merton Priory is continuing to build up a 'layered' approach to the evidential case, including assessment of building condition and viability of regeneration options.

Another layer in the evidential case will be to examine the quality of the built environment within Ravensbury, with particular reference to

permeability and access; usable private and communal open space; densities; adjacencies and overlooking of spaces. This will require a comprehensive and impartial review of the existing Ravensbury estate from an urban design perspective.

In January 2015 Circle Housing Merton Priory commissioned Sue McGlynn Urban Design Ltd to carry out the review.



Above: View of Ravensbury Estate
Image: Google Earth.

36 ~ 50

BOROUGH OF MITCHAM
CYCLING ON
FOOTPATHS
PROHIBITED
BY ORDER
R. H. WHITE
TOWN CLERK

About the Review

Process | Methods

Process

This study sets out to evaluate Ravensbury against the established principles of good design and does not attempt to make aesthetic or value judgements on the architectural style of Ravensbury. Instead it concentrates on the physical, spatial and environmental aspects of the design and the quality of the neighbourhood that results.

The National Planning Policy Framework and National Planning Practice Guidance on Design endorse the principles set out in a number of previous documents, such as the *Urban Design Compendium*, *Safer Places: The planning system and crime prevention, Manual for Streets 1&2*, *The Mayor's London Plan (chapter 7)*, and older documents such as *By Design*. A comprehensive commentary on better design can be found in Circle Housing's own publication *Design Guide for Development Use*.

The National Planning Policy Framework (para.58) defines well-designed places as places that:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- are visually attractive as a result of good architecture and appropriate landscaping.

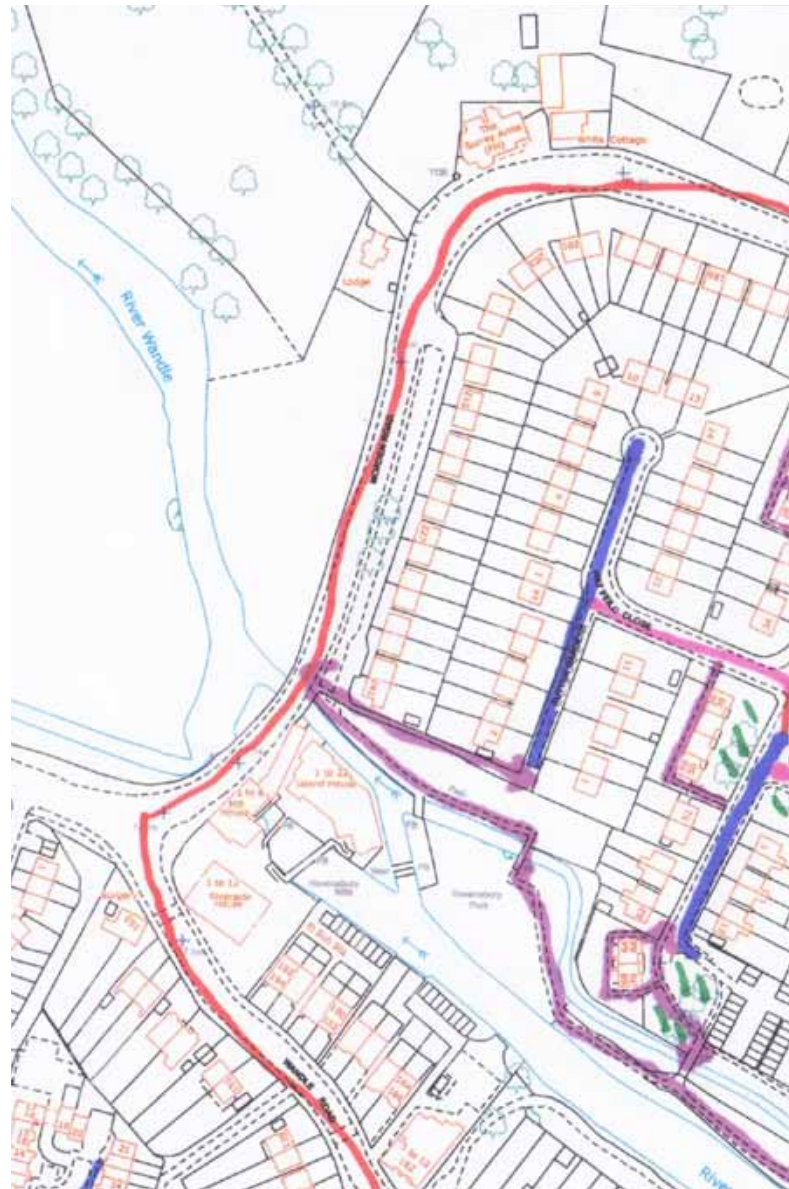
Methods

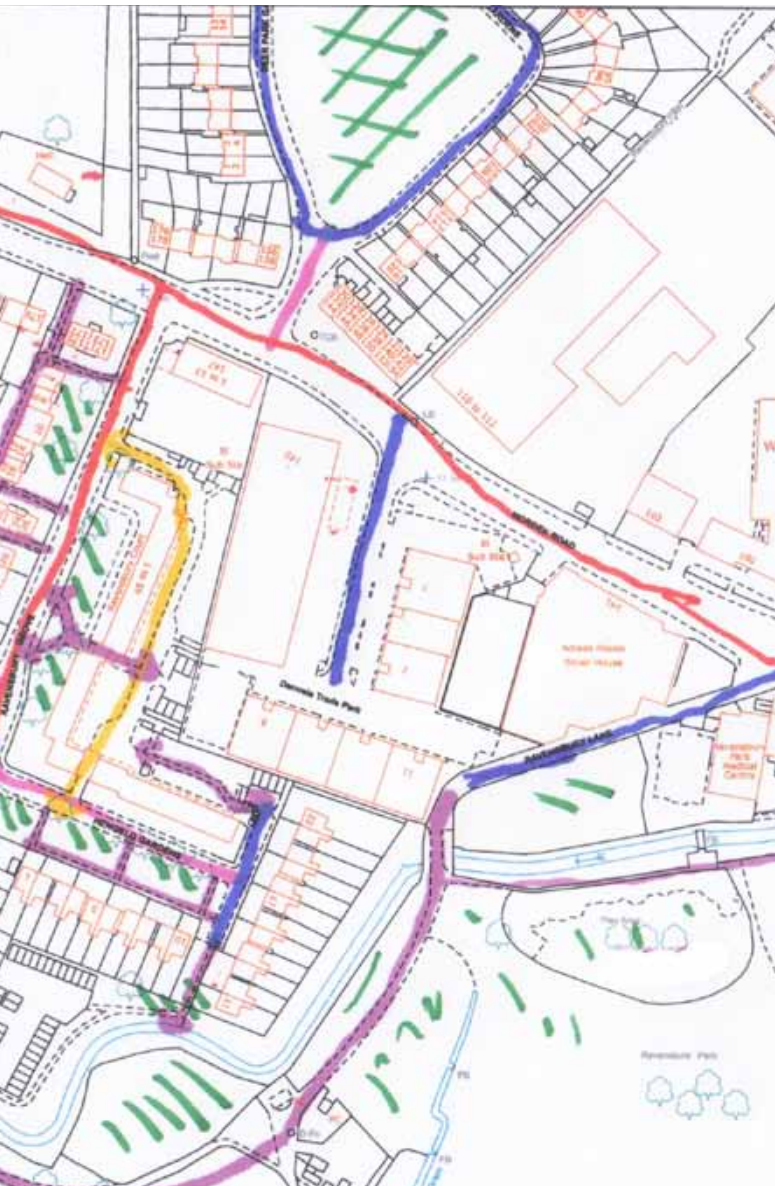
The review involved an assessment of the elements of the built environment of Ravensbury identified in Circle Housing Merton Priory's brief. These are:

- Urban structure and access
- Building layout and alignment in relation to routes
- Façades and their interfaces with public spaces
- Height and massing
- Density and mix
- Building, landscape and public realm quality

A number of key measures were used to evaluate these elements and their performance in relation to current best practice urban design principles and policy:

- Relative integration of the estate with its surrounding area, using techniques developed by Space Syntax Ltd;
- Building position relative to routes to reveal the degree of definition of public and private spaces, using 'figure ground' analysis;
- The extent to which buildings provide active frontage to all public routes for safety, surveillance and sociability, by mapping 'active', 'passive' and 'dead' frontage;
- Photographic survey of buildings, landscape, streetscape and open space quality.





In addition, simple mapping and recording of other characteristics of the estate were compiled with a combination of on-site observation and use of secondary sources where data already exists. These are credited in the report where used.

The commission took place over 4 weeks in late January and February 2015. The surveys were carried out during weekdays and during working hours so no assessment has been made of the night-time experience of Ravensbury, such as lighting levels or parking.

The report is in three sections dealing with the main themes of analysis:

1. Urban structure
2. Layout
3. Quality of the external environment

Each section of the report provides an explanation of the methods used, an account of the analysis, followed by conclusions and key findings.

At the end of the report, the overall performance of Ravensbury is summarized against the Building for Life 12 criteria, the Government and industry endorsed assessment method for residential development.



Review themes

Urban structure | Layout | Quality of the external environment

Urban structure

Urban structure is an important spatial measure of social inclusion or exclusion and therefore a significant factor in deciding whether to refurbish or regenerate Ravensbury.

This section evaluates two aspects of Ravensbury's urban structure, integration and connectivity. Each aspect is considered at two scales – the wider context within which Ravensbury is set and the immediate surroundings of the estate.

Integration: Assessing the 'depth' of Ravensbury relative to the wider area of south-west London and to its locality. This is an important measure of the extent to which residents have access to public transport and all the other opportunities that living in a capital city offer. Accessibility at this scale is often a significant indicator of life chances and residential value.

Connectivity: Assessing the relative interconnectedness of routes around and within the estate. This type of analysis reveals the nature of pedestrian access and the ease, convenience and safety of moving around the immediate neighbourhood. Accessibility at this scale is often a significant indicator of legibility and perceived safety of routes in the locality.



Above: A fully connected 'deformed grid' in the Merton district.



Above: A 'Radburn' layout in Grove Hill, Hemel Hempstead, with segregated routes and a confused building arrangement.

Space Syntax

We have used Space Syntax theory and its techniques of analysis to measure Ravensbury's level of integration and connectivity. The study area for the analysis was defined by bounding features such as railways, rivers, major routes and open spaces and encompasses most of the district of Merton.

Research since the 1970s by Bill Hillier and his colleagues at The Space Syntax Laboratory, University College London has led to a fundamental understanding of the relationship between spatial design and the use of space, the emergence of land uses and longer-term social outcomes.

Analysis of connected street systems reveals a structure of a few long straight lines that form the main settlement-wide movement routes.

The remainder, the more numerous and shorter lines, represent the more local movement system. These are the quieter streets that carry less movement but are still connected to the wider movement network.

In the hierarchical movement systems introduced from the 1950s onwards, the pattern of development is very different, with pedestrians frequently segregated from vehicular movement at the local level. The very ends of the movement system are the culs-de-sac so familiar from the 1960s onwards in both public and private sector housing development. This has frequently resulted in pedestrian paths that are routed along the backs of property with little or no surveillance, that are less direct and legible and have a very low quality of walking experience.



The wider Merton context in 'axial line' form, showing routes open to all modes of transport and coloured for integration.

Recent design guidance has recognized that we need streets that are designed for all modes of movement to be integrated within the same space; streets that are convenient for vehicular movement but are also safe, convenient and attractive for walking and cycling at a local scale (Manual for Streets 1 and 2, Building for Life 12).

Hillier et al's Space Syntax approach uses a number of geometric measures to represent the relative connectivity of the 'segments' of public space, defined by drawing lines, called 'axial lines', through the system being analysed.

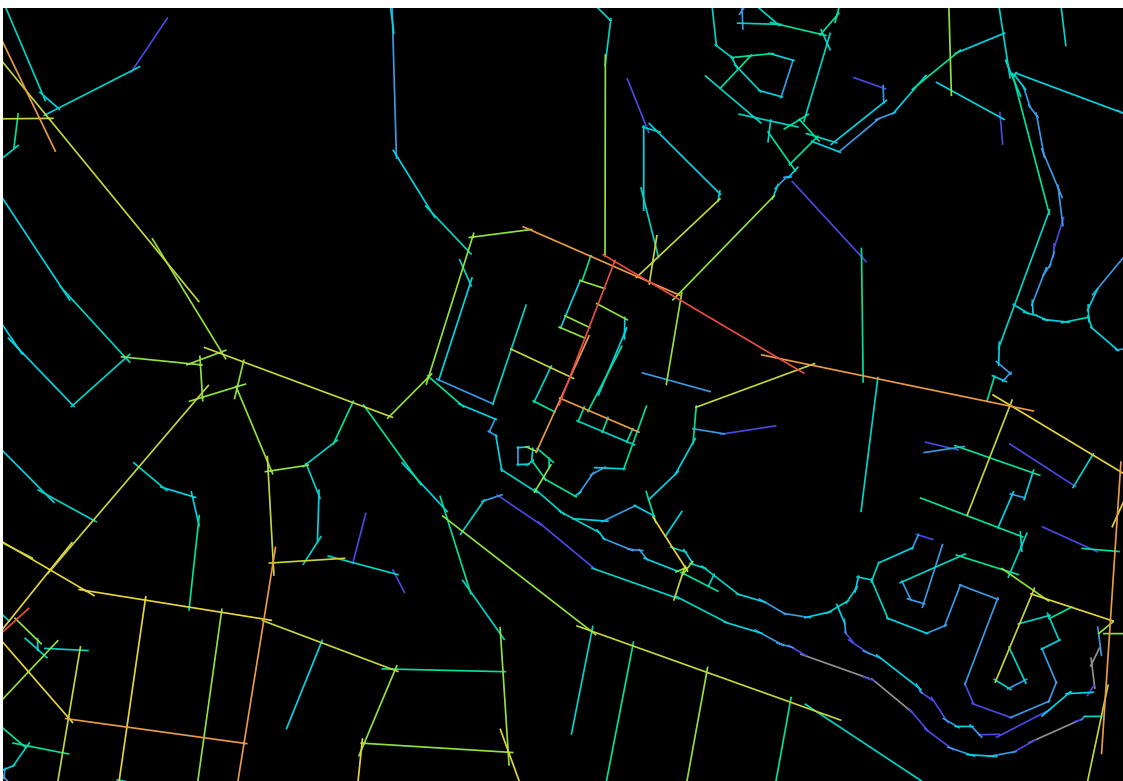
These studies show that the movement intensity along any line segment – that is, any length of line with an unobstructed view from one end to the other – depends on the segment's pattern

of connections to all the other segments in a given area around it.

Segment length depends on the bendiness of the corridor with the longest segments tending naturally to pick up the largest number of connections.

The most intensive movement will flow along these straightest, most-connected segments (in hotter colours in the diagram), while the shortest, leastconnected segments will be quietest; as shown by the cooler colours.

The geometry of a layout has a pronounced effect on actual and perceived connectivity and legibility as well as actual and perceived levels of safety.



Ravensbury in axial line form for pedestrian-accessible routes, analysed for integration.

Wider context: accessibility








Accessibility is well- documented in transport and planning policy documents and Ravensbury falls within an area with a Public Transport Accessibility Level (PTAL) of 2, defined as 'poor' by The London Plan. This rating reflects the peripheral location of Morden and Mitcham within the Greater London area.

The PTAL score is used as an initial basis for determining housing density and parking ratios as defined in the London Plan and so has implications should the decision to regenerate Ravensbury be taken. Generally, the higher the score, the higher the housing density with significantly reduced car parking levels. In lower PTAL areas, such as at Ravensbury, dense flatted development is unlikely to be acceptable and parking levels need to reflect the relevant London Plan or local authority standards compatible with the likely car ownership levels.

Ravensbury has a reasonable range of public transport options within a 15 minute walking radius. The underground station at Morden is a 15 minute walk but the Belgrave Walk tram stop is only a 5 -minute walk, accessed via Ravensbury Path. Two other tram stations, Phipps Bridge and Merton, also fall within the 10 and 15 minute radii and the estate is also relatively well-served by bus services on the London and Morden Roads.

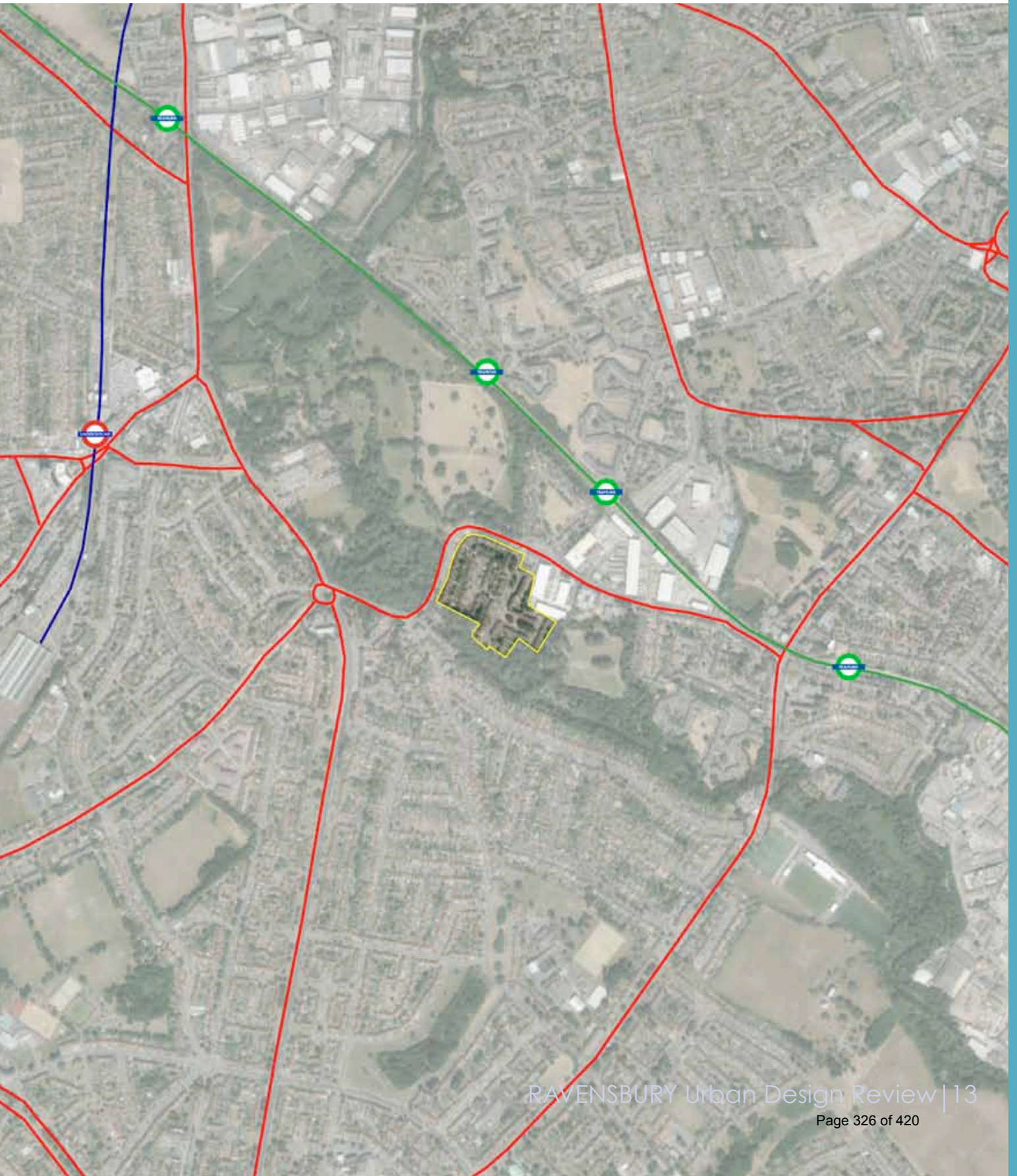
A summary diagram of accessibility is included [here](#).

Key:

-  National rail
-  Tram stop
-  Underground station
-  Underground rail line
-  Overground railway line
-  Strategic route
-  Tram line

Right: Major access and movement infrastructure for Ravensbury and surroundings.





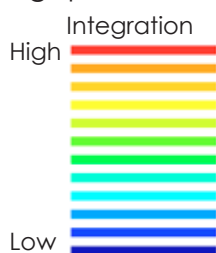
Wider context: Integration analysis R8

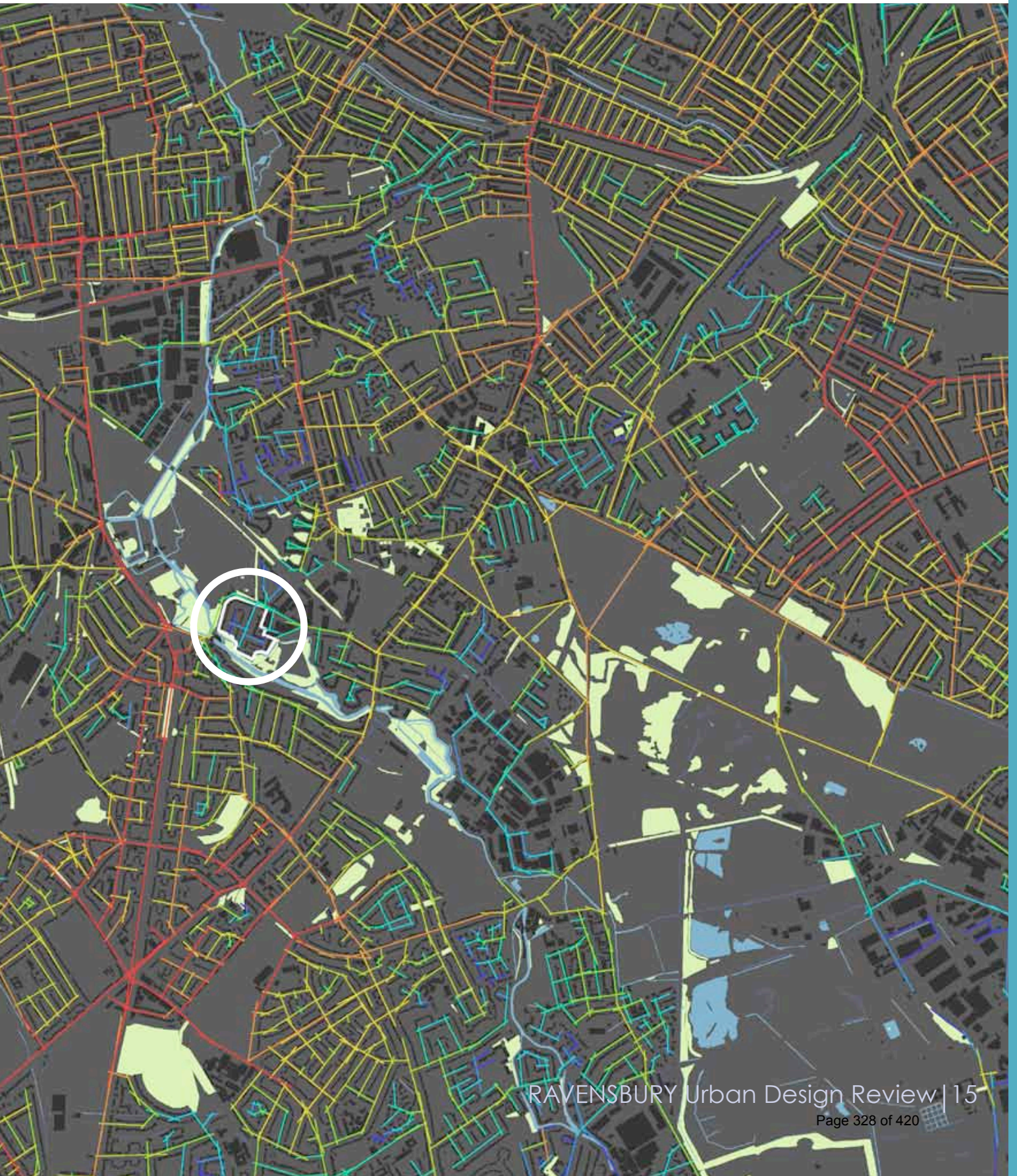
Using the Space Syntax 'Depthmap' software, here we perform graph analysis on an 'axial map' of the study area of wider Merton. The axial lines are drawn through routes available for use by all movement modes but exclude routes accessible only to pedestrians and cyclists.

Integration is a measure of the average depth of a space to all other spaces in the system. The spaces of a system can be ranked from the most integrated to the most segregated. The software applies a relative colour scheme to help show a route's level of integration, with the most integrated routes appearing in warm colours (red, orange yellow) and the most segregated routes showing in cooler colours (greens, blues, purples). As such, integration analysis is a measure of 'depth' in the system.

As Ravensbury is embedded within a large city it cannot be analysed as a closed system. 'R8' is used here to help routes near the edge of the area modelled from showing as overly 'cool' when in effect they are just located at the edge of the study area.

As the diagram shows, Ravensbury is in a relatively isolated location within the Borough and is consequently 'deep' from the most integrated routes that provide access to the wider area of south London and beyond. Movement is disrupted in this part of the Borough by the river valley and its flood plain and the canals, railways and commons lying within it. These green wedges can be traced following the course of the Wandle and other tributaries of the River Thames and is very visible in the space syntax diagram as a 'gap' in the street grid of south London.



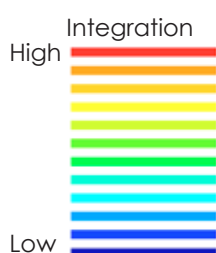


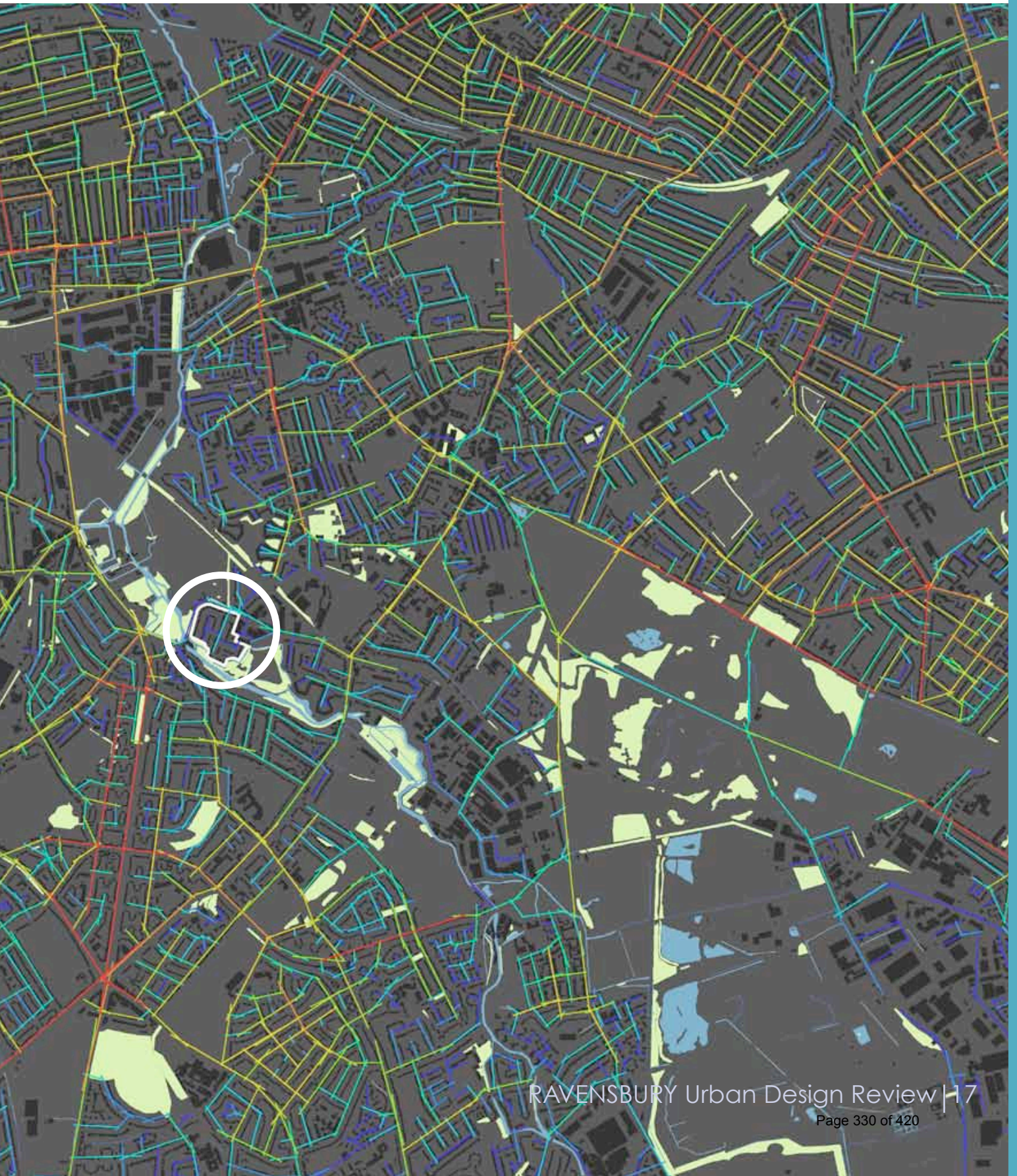
Wider context: Integration analysis R3

As before, integration analysis is useful as a measure of 'depth' in the system. Here we change the analysis to R3 as this is an important consideration for assessing the walkability of a movement system. Radius 3 has been shown to be a 'tipping point' for modal choice; areas deeper than R3 within a system show a marked shift towards motorised travel, likely because routes become unnecessarily indirect and complicated.

As the diagram shows, virtually the whole area south of Mitcham and Morden is relatively 'cool' indicating that many journeys will require three -step changes of direction (R3) or more. This is a strong indication that the car will increasingly be the mode of choice, even for short journeys. In these circumstances, not only will car ownership likely to increase but also car use.

The estate is adjacent to the Morden Road which has an important movement function in the study area. Movement is intensified along Morden Road owing to this disruption of the movement grid and the lack of alternative routes. As a location, Ravensbury benefits from its proximity to and direct connection with Morden Road as it provides the link between the main radial routes of Mitcham and Morden.



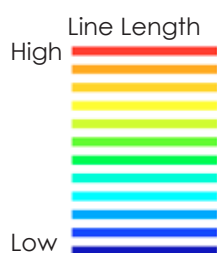


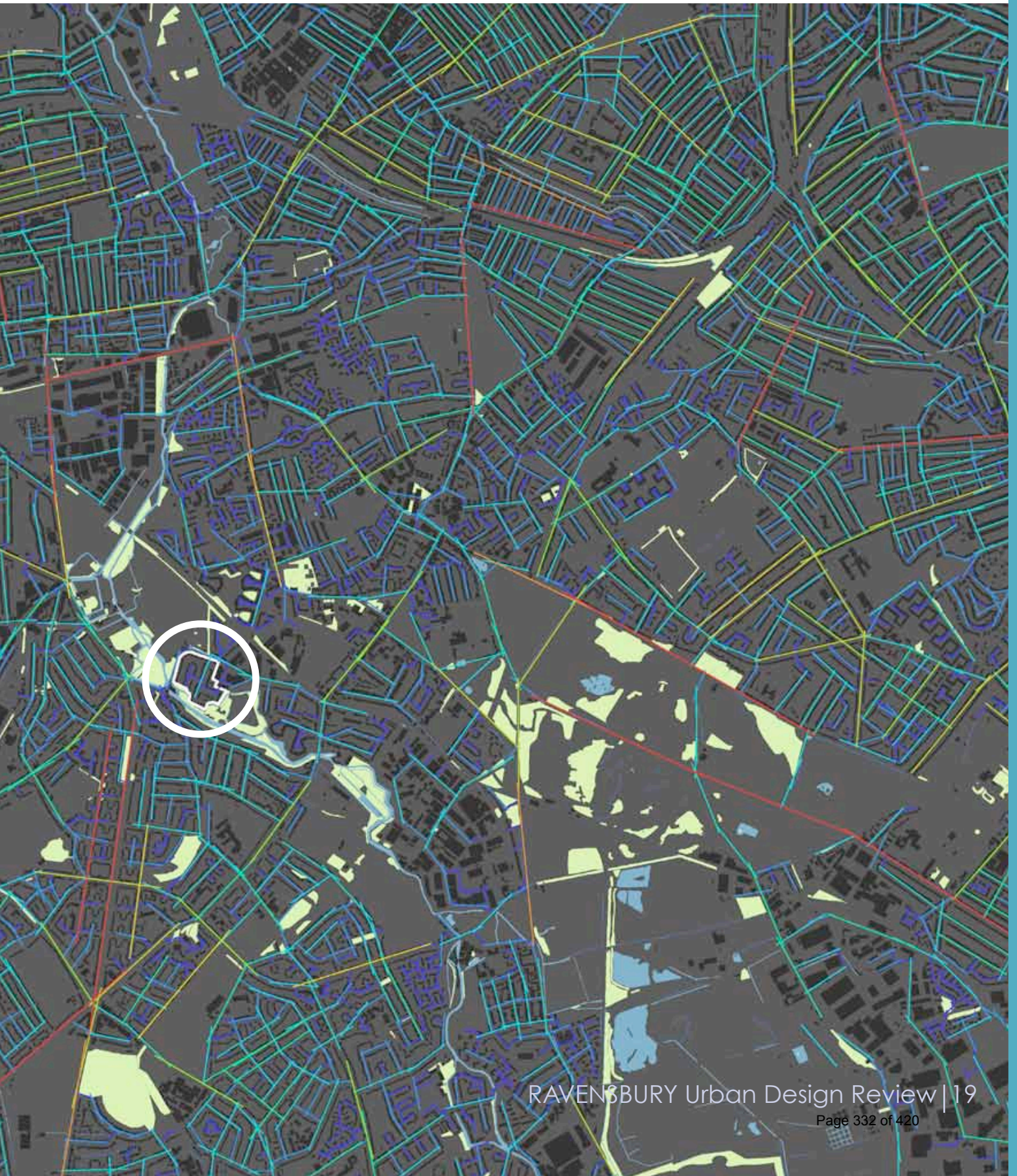
Wider context: line length across the study area

Line lengths can be used as a proxy for intelligibility. Longer sight lines allow you to see further ahead on your journey, identify possible junctions and route options and assess alternatives in terms of direction and convenience. This is an important feature of movement networks as it allows us to move confidently even in unfamiliar places as we are able to judge which routes are part of the overall movement system and which give access only to more local areas. By contrast, short lines with frequent changes of direction mean it is difficult to understand at ground level how one route relates to another and whether the route you are on will take you in the right direction.

Again, the colour system in the diagram denotes line length, with warm colours representing the longest lines in the study area and blue and dark blue the shortest. The analysis, as shown by the diagram, reveals a very high number of 'cool' lines in the whole study area. This is in part caused by the widespread truncation of routes where they meet rivers, railway lines and extensive areas of green space.

In addition, the space syntax analysis confirms observation on the ground, or by Google Street view, that the relatively small number of longer, warmer-coloured lines identify historic routes or those dating from the 19th and early- to mid-20th century periods of suburban development.





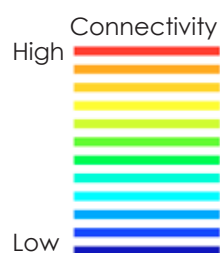
Local context: Integration Analysis (R3)

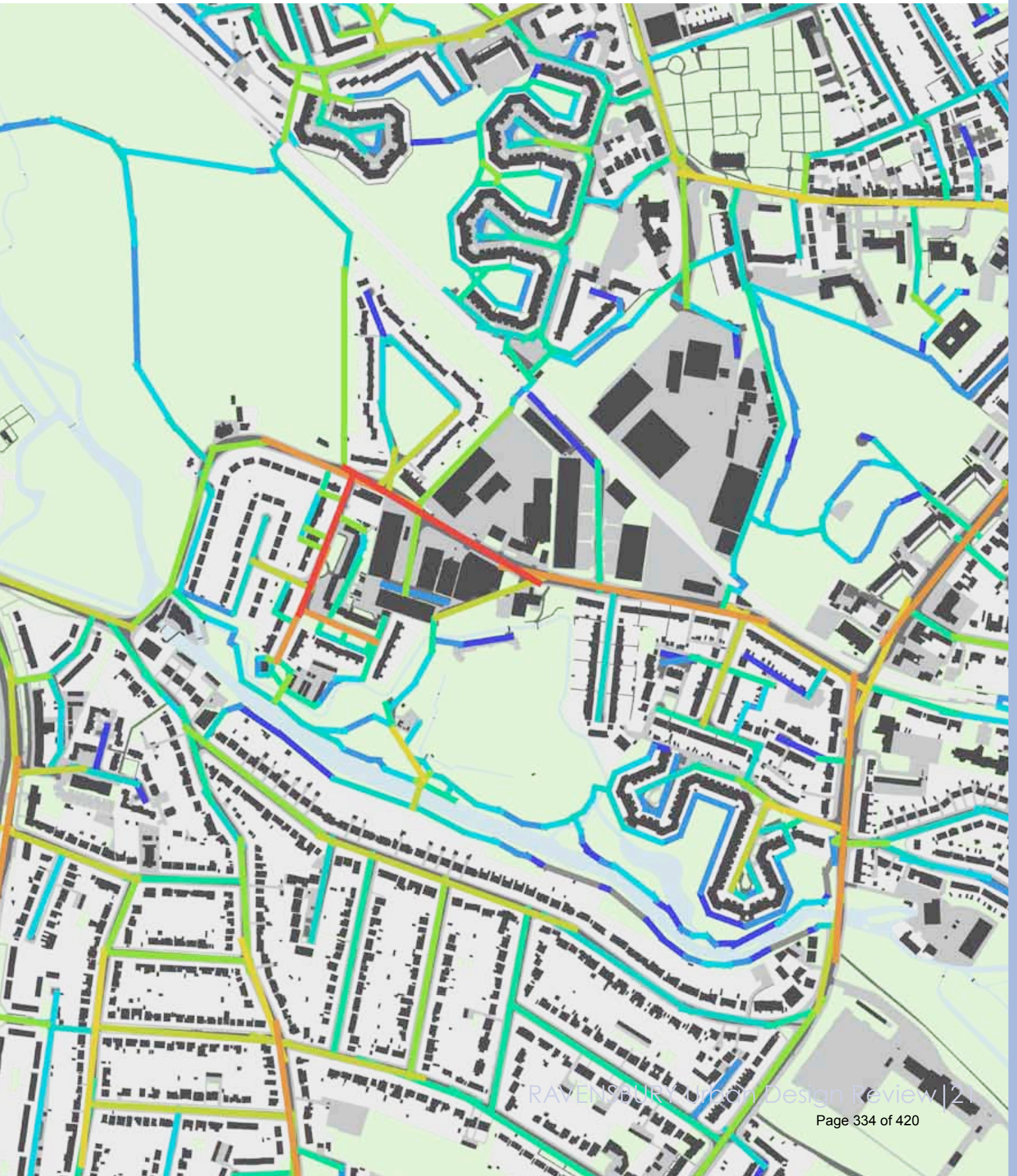
The analysis of the wider context has shown that Ravensbury is located in a relatively isolated part of the Borough. Moving to the site in more detail, we can see that low levels of integration are apparent here too. Ravensbury is defined and bounded by the River Wandle, parks, open spaces and the railway line to the north. This means that the estate cannot be anything other than a segregated enclave, almost regardless of the design of the layout.

On the one hand this creates a quiet residential environment but on the other hand restricts movement options for residents and is likely to encourage more trips to be taken by car.

Being a cul-de-sac, the current layout of the estate re-inforces this 'natural' separation but it remains very 'shallow' in terms of walkability to both the urban facilities on Morden Road and the leisure and play facilities afforded by the riverside and other green spaces. This perhaps explains why residents value this seclusion so highly – they have the benefit of a quiet and secluded neighbourhood combined with direct and convenient connections to local facilities, services and recreation spaces.

The challenge for every new development in the Borough is to make small but potentially significant improvements in integration, particularly when situated in an already relatively isolated location such as Ravensbury. However, opportunities to achieve this at Ravensbury are limited by the enclave nature of the site.





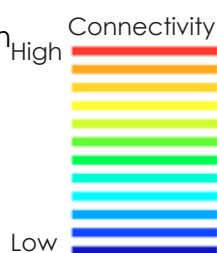
Local context: Connectivity analysis

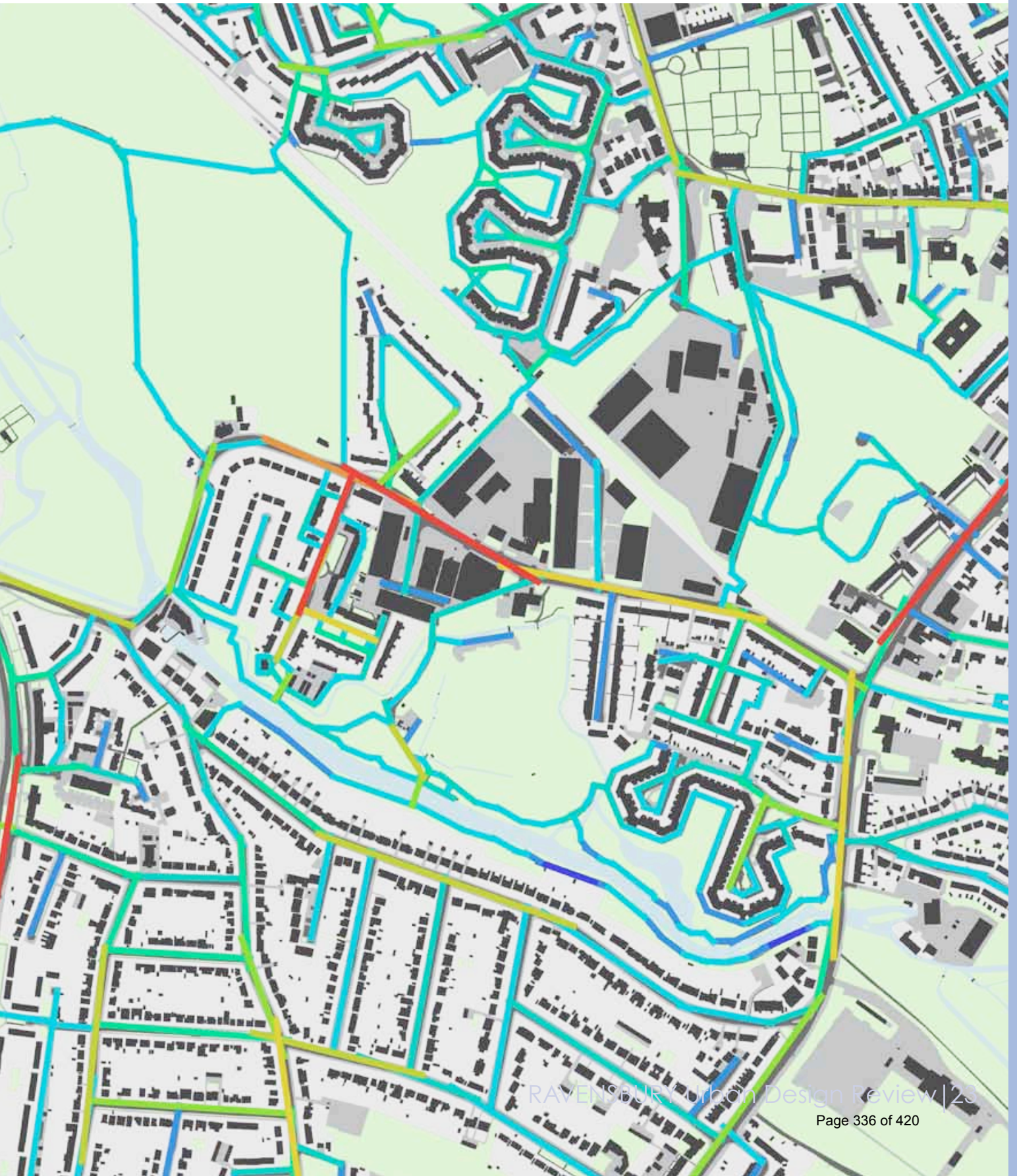
Connectivity can be used as a proxy for the intelligibility of a layout. The ability to understand how the route you are on is connected to other routes has been shown to be a key factor in developing a 'picture' of an overall system. Poorly connected routes give little information about an overall structure and make navigation more difficult, whereas highly visible, connected routes allow users to gather a great deal of information about the place they are in and whether they can move through it easily and without backtracking. Put simply, connectivity is a measure of the number of times a line in the model is connected onto other lines. In this type of analysis, axial lines are drawn for all connections including footpaths and cycle paths.

The analysis shows that the section of Morden Road adjacent to the estate is 'hot'. This is because many vehicular, pedestrian and cycle connections converge on this section of the road. This explains the location of the small parade of shops as it is here that local movement is intensified.

However, it should be noted that this is a quantitative assessment of connection not a qualitative one. Many of the connections shown may not be easy or pleasant to use in all weathers or times of the day.

The other point to note is that within Ravensbury the vehicular routes are relatively 'warm' by comparison with the pedestrian and cycle routes, which show as 'blue' in the analysis. Although the estate is very shallow to the green spaces of the riverside and parks the connections between the two are not as legible. The regeneration of the estate could provide the opportunity to improve this situation, by making better connections between the estate and the nearby 'green' routes and play spaces.





Urban structure summary

The various scales of the Space Syntax analysis show that this part of the Borough is relatively isolated. The combination of the peripheral location of the site within south London and the natural and other boundaries that surround Ravensbury make it an enclave. The overall isolation of the estate cannot be significantly improved. However, the seclusion and absence of through traffic is valued highly by residents and adds to the attraction of the location as a residential environment.

1. Ravensbury is located in a peripheral location of the Greater London area and this is reflected in its PTAL classification of 'poor' (2). However, the estate does have a reasonable range of public transport options within a 15 -minute walking isochrone.
2. A number of natural and other barriers create very strong edges around the estate and restrict movement and access locally and to the surrounding area. This is likely to encourage both higher car ownership and higher car use.
3. As a location, Ravensbury benefits from its proximity to and direct connection with Morden Road which has an important movement function in the local area. Movement is intensified along Morden Road owing to the distortion of the street grid by extensive areas of green infrastructure and the lack of alternative routes.
4. Ravensbury is very 'shallow' in terms of walkability to both the urban facilities on Morden Road and the leisure and play facilities afforded by the riverside and other green spaces. This perhaps explains why residents value this seclusion so highly: they have the benefit of a quiet and secluded neighbourhood combined with direct and convenient connections to local facilities, services and recreation spaces.
5. It is important not to make the estate over- permeable as this will undermine seclusion for residents and disperse movement and activity without any real gains in wider connectivity.
6. The regeneration of the estate could provide the opportunity to make better pedestrian connections between the 'everyday' routes within the estate and the nearby 'green' routes, play spaces and other footpath and cycling routes.

Layout

The previous section analysed various aspects of the movement network in both the wider area and locality of Ravensbury. This section evaluates the layout of buildings on the estate and the way that they are oriented to streets, pedestrian routes and open spaces.

The purpose of the analysis is to assess whether the building layout and facades provide the required level of surveillance and activity to animate the streets and communal open spaces as well as ensuring the privacy and security of gardens.

Two aspects are considered:

- Building layout
- Building interfaces

Building layout

The following sequence of 'figure ground' diagrams illustrates the ways in which buildings define both public and private spaces. They compare the pattern seen in Ravensbury with that of the surrounding area.

A 'figure ground' plan highlights either the 'figure', ie the enclosed space of buildings or the 'ground', ie the 'unbuilt' open space in either public or private ownership.

The first 'figure ground' plan maps only the buildings in black. The street network is clearly visible and well-defined on the Ravensbury estate, as it is in the majority of the surrounding residential areas. This is because there is a strong and consistent correlation between building alignment and the line of the street. This can be seen at the external perimeter of the estate where the building line follows the curved edge to Morden Road as well as the internal perimeter where buildings follow the simple rectilinear street layout.

Right: A 'figure ground' diagram of the wider Merton area, with Ravensbury estate outlined in yellow. Note the uniformity of the both Ravensbury and the housing to the south of the river built in a similar period.





The second figure ground plan maps only the open space in black ie the 'unbuilt' space. In the residential areas immediately around the estate most of this is either the public space of the street or is enclosed as private front and rear gardens. At Ravensbury and Deer Park Gardens the distribution of open space shows a different pattern, with significant areas being given over to communal spaces at the front of buildings as well as the private space of rear and front gardens. However, there are few ambiguous spaces within Ravensbury and buildings are used to make very clear distinctions between the communal spaces of the estate and the private spaces of the home.

Right: Unbuilt space is revealed in this reverse of the normal 'figure ground' diagram and shows how the buildings define public space and enclose private space.





Building interfaces: Active frontages

One of the most important features of 'perimeter block development' is that building fronts and entrances should be oriented to face the street. This sets up the mutually re-inforcing relationship of active and well-surveilled public spaces at the front of dwellings and private spaces away from public view at the rear. The importance of this relationship for creating safe, lively and sociable places is recognized in the National Planning Policy Framework and Planning policy Guidance on Design.

The logical extension of this is that all streets and pedestrian routes should be lined by the front of buildings rather than their sides and backs. The following sequence of diagrams adds a further layer to the analysis by indicating the position of building entrances and mapping the 'transparency' of building facades at ground floor level where they are adjacent to publicly-accessible space.

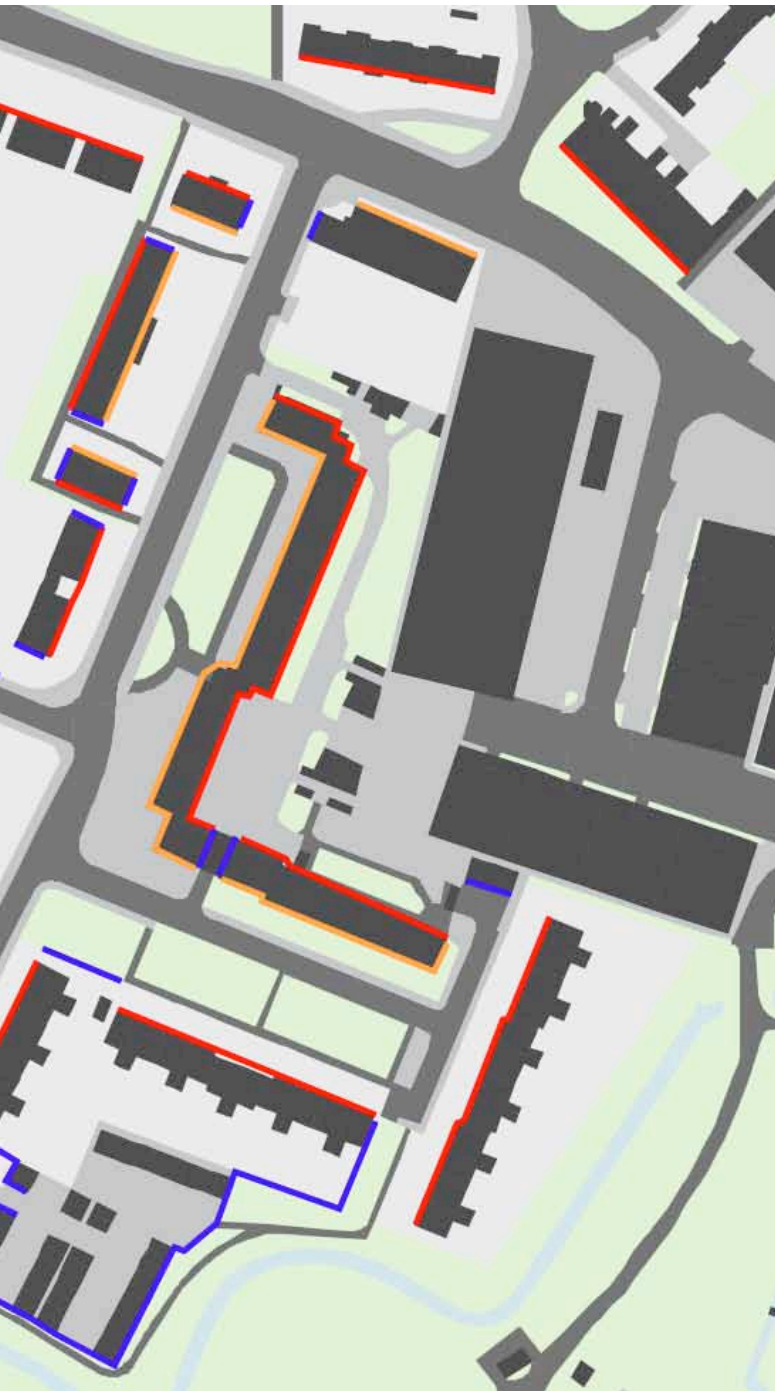
Building facades have been mapped according to the following classifications:

- Active frontage is defined as facades that having both doors and windows of inhabited rooms (ie not bathrooms, storerooms, lobbies or garages) at regular intervals along the street or route to provide surveillance as well as contact and movement between inside and out.
- Passive frontage is defined as facades with only windows of inhabited rooms but no doorways, providing surveillance but no contact between public and private space.
- Dead frontage is where the edge to the public space or route is a blank wall or wall that is effectively blank, for instance rows of garage doors or where windows are obscured.



Key:

- Active
- Passive
- Dead



1. Ravensbury Court: 'Passive frontage' but good surveillance to the street and communal space.
2. Ravensbury Grove flats, again showing 'passive frontage' but with good surveillance.
3. 'Active frontages' of Ravensbury Court face the internal space rather than the public space.
4. Semi-detached 'Orlit' houses with 'active frontage' in Hatfield Close.

Building interfaces: Doors and building entrances

As the diagrams illustrate, the analysis at Ravensbury shows two different responses. This may indicate that it was planned and designed at a period when theories of residential layout and movement were in transition.

The houses all face the streets in a consistent manner, providing continuous active frontage with doors and windows. Private amenity space is provided away from public view at the rear of properties. However, the entrances to maisonettes and flats are all switched to the 'rear' of the buildings, minimizing contact and activity with the streets. The archways in Ravensbury Court provide pedestrian access from the street fronts to the dwelling entrances at the rear.

The maisonette typology does at least ensure continuous passive frontage. Living rooms rather than bedrooms are adjacent to the ground floor street edges and communal spaces. However, maisonettes have no external amenity space and the ground floor units do not have independent entrances from the street. The 2-storey flats have access only to a small terrace or balcony but this does overlook the street without having direct access from it.

There is very little dead frontage to the main routes of the estate. The exception to this pattern is the edges of the garage courts and the pedestrian paths that have no frontage at all. This issue could be addressed and rectified by regeneration of the estate.

In summary, most building facades contribute positively to the surveillance, liveliness and activity of streets and communal spaces.



Key:

- Flat entrance/exit
- Double doorway
- Single doorway



1. Rear access to flats on Ravensbury Grove. All gates to flats were open at the time of visit.
2. Ground floor entrances for the maisonettes inside Ravensbury Court.
3. Entry to the upper floor maisonettes in Ravensbury Court.
4. Terraced houses with shared access to rear gardens.

Layout summary

1. The figure ground plans show that Ravensbury adopts a similar 'perimeter block' pattern of development to surrounding residential areas.
2. There is a strong and consistent correlation between building alignment and the line of the street. This can be seen at the external perimeter of the estate where the building line follows the curved edge to Morden Road as well as the internal perimeter where buildings follow the simple rectilinear street layout.
3. There are few ambiguous spaces within Ravensbury and buildings are used to make very clear distinctions between the communal spaces of the estate and the private spaces of the home.
4. Most building facades contribute positively to the surveillance, liveliness and activity of streets and communal spaces. Houses all face the streets in a consistent manner, providing continuous active frontage with doors and windows. However, the entrances to maisonettes and flats are all switched to the 'rear', reducing contact and activity between buildings and streets.
5. There is very little dead frontage to the main routes of the estate. The spaces with the least intervisibility and surveillance are the garage courts and the pedestrian paths. This issue could be remedied during the regeneration of the estate.

Quality of the external environment

This final theme of the review assesses the quality of the external environment of the estate. It reviews Ravensbury from an urban design point of view and concentrates on the physical, spatial and environmental aspects of the estate's design.

It does not include stock condition of buildings or a detailed analysis of dwelling types as this is provided in other baseline studies.

The elements reviewed are:

Buildings

- Building character, types and massing
- Density and mix

Public realm

- Streetscape
- Landscape
- Open spaces

This part of the review primarily uses photos to identify characteristic types of buildings and spaces and highlights key issues of quality and use.

Building character, density and mix

The majority of the area surrounding Ravensbury is characterized by post-war suburban housing, typically detached, semi-detached or in short terraces and of one or two storeys in height. Although constructed during the same period, the Ravensbury Estate has a distinctive identity, mainly by virtue of its secluded setting and landscape but also because of the formal arrangement and massing of building groups to define spaces and sub-areas within the estate.

It has three very different characters: The busy, urban edge to Morden Road; the green and 'rural' edge to the River Wandle; and the secluded communal and private spaces within the estate.

Building types are:

2-storey, semi-detached pre-cast concrete Orlit houses, around the perimeter and mainly the western half of the site

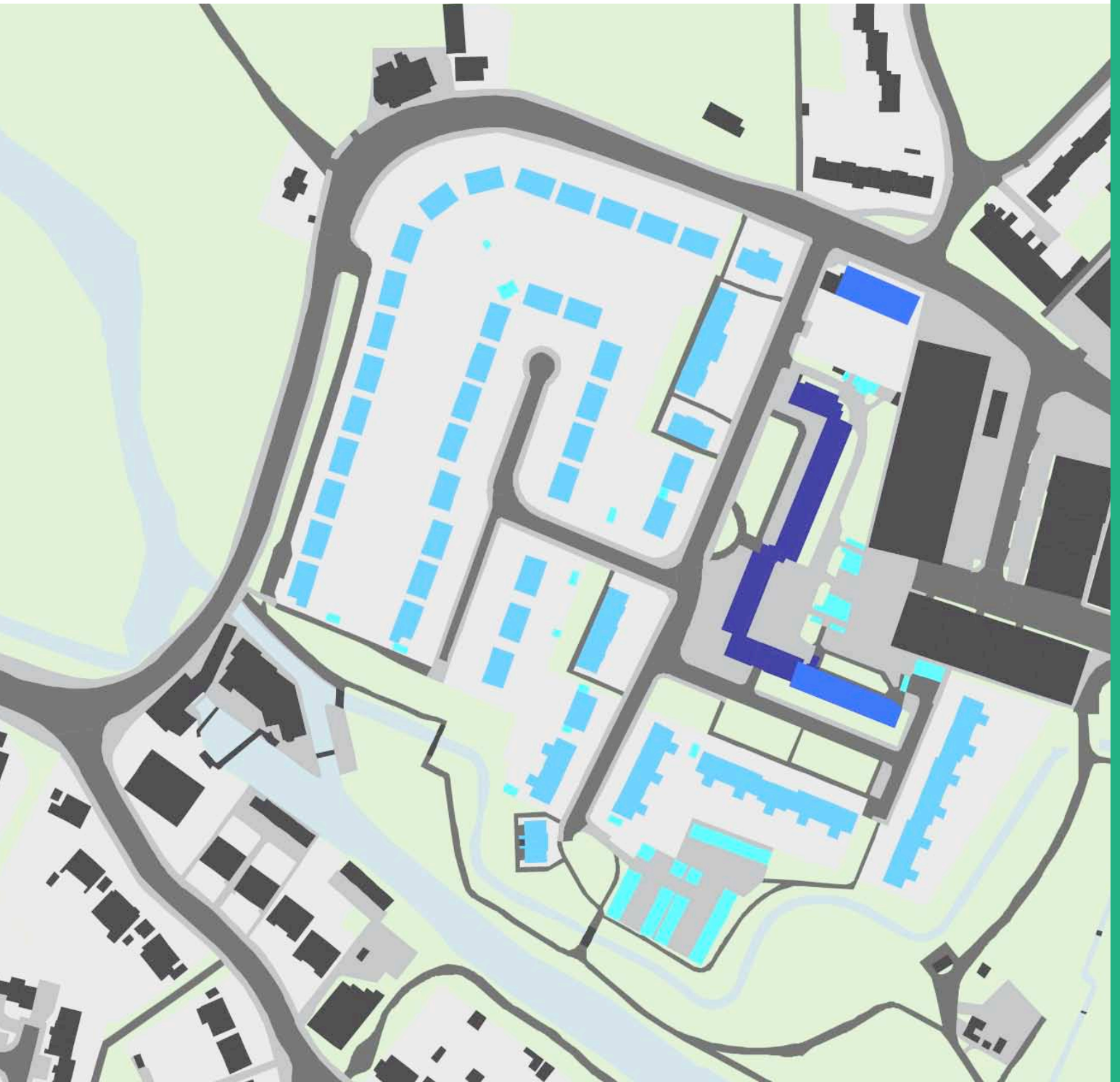
2-storey terraces of houses and flats

4-storey, L-shaped terrace of maisonettes

Apart from the concrete Orlit houses, a simple palette of brick and tile materials unifies the building types and groups.

Ravensbury currently has 192 homes in an area of 4.43 ha, giving a density of 43 dwellings per hectare (dph). This density is similar to the surrounding development of the same period but is low by modern standards, even in a suburban location. The homes are a mix of 1-bed flats, 2-bed maisonettes and 2- and 3-bed houses. Of the 192, 66 are in private ownership with the remaining 126 occupied by Circle Merton Priory tenants.

The development options are complex on this site, and will mainly be determined by ownership and building condition. However, there is clearly potential to increase density and building height through various permutations of retention and regeneration. For instance, the garage courts at the south-east corner of the site are little used yet they occupy the most valuable part of the site with river frontage. There is also potential to increase building height within the site and to create a stronger built edge to the section of Morden Road east of The Surrey Arms public house.



Key:



This sequence of images shows the range of building heights and types present on the estate. A simple palette of materials unifies the building types and groups within the estate.

1. Two-storey, semi-detached Orilt houses to the urban edge of Morden Road.
2. Orilts with slip-road to Morden Road. There is potential along both these frontages to increase building heights.
3. Four storey maisonettes. The building to building distance across Ravensbury Grove (pictured) and Henglo Gardens combined with landscape preserve the open feel of the estate.
4. Sub-areas within the estate defined by building height, type and landscape, as shown here in Henglo Gardens.
5. Short two-storey terraces of flats in Ravensbury Grove.
6. Two-storey terraced houses to Hengelo Gardens.





Streetscape: vehicular routes

- The road types are typical of this period of development, with standard widths and surface treatment of black-top carriageways and pavements with concrete kerbs. The exception is the narrower carriageway of Rutter Gardens.
- The simple, straight street layout provides an efficient edge for parking. This does not dominate the streetscape where carriageways are wide enough to park on street and where mature trees reduce visual impact, for instance on Ravensbury Grove and Hengelo Gardens.
- High levels of car ownership were apparent at the time of the survey – day time during a weekday. It is safe to assume that this gets more problematic in the evening and weekends. This is unsurprising in a suburban location with a PTAL rating of 2, 'poor'.
- At the moment a large proportion of the houses have on-plot parking with the rest being provided on street. The garage courts looked unused and are probably too small for modern cars.
- There is a significant amount of 'wheels up' parking in Hatfield Close and this is visually intrusive as well as blocking pavements for pedestrians. However, as the whole estate is in effect a cul-de-sac vehicle flows and speeds are generally low and it feels quite safe to walk in the carriageway. During the regeneration of the estate it would be positive to formalize this by introducing shared-surface streets.
- Should the regeneration option be taken and the number of dwellings increased significantly then car parking might become a serious problem. This will need careful design and management to prevent the streetscape of the new neighbourhood from being dominated by parked cars and also to prevent this becoming a source of friction between new and existing residents.



Key:

- Routes fully connected to the wider system
- Connected routes leading to dead ends
- Dead end routes



1. Morden Road is the only busy through route. Its standard highways design and treatment is softened by the mature trees on both sides of the road.
2. Ravensbury Grove is the main access for the estate. It has parking on both sides of the street.
3. Hatfield Close has on-plot parking in long front gardens but 'wheels-up' parking still happens.
4. Internal street behind Ravensbury Court.

Streetscape: pedestrian routes

Generally, pedestrians and drivers use the same street spaces to move around and these feel safe, legible and direct. There are very few pedestrian -only routes within the estate. The exceptions are the route that connects the southern end of Rutter Gardens with Morden Road and the paths at the south of Ravensbury Grove and Hengelo Gardens to the riverside. All of these routes could be improved.

- The long footpath from Rutter Gardens is narrow and unsurveilled and was the only place on the estate where litter was evident. This is the only existing pedestrian access from the west of the estate to Morden Road and the bus stop.
- Of the paths at the south of the estate, the route from Ravensbury Grove is the most important. This provides access not only to the stream edge but also across the stream onto the Wandle riverside pathway and to Ravensbury Park.
- The route from Hengelo Gardens is gated and evidently little used, giving access to an overgrown area by the stream and then passes behind the rear of the garage court.



Key:

---▶ Pedestrian routes



1. Footpath connecting Rutter Gardens to Morden Road.
2. Archway route connecting interior of Ravensbury Court to Ravensbury Grove.
3. Footbridge at the southern end of the estate giving access across the stream to the riverside walk.
4. Pedestrian routes giving access to entrances at the rear of flats.

Landscape

Ravensbury has a distinctive landscape and an open and green character. The whole estate is set within a significant area of high landscape value, with access to an extensive area of parkland and the green corridor of the River Wandle. Even its 'urban' northern and western boundaries with Morden Road face the woodland within Morden Hall Park.

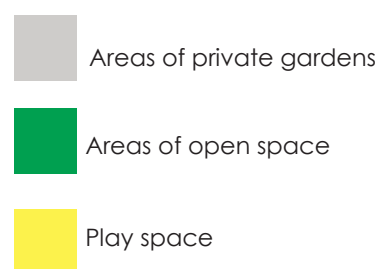
Internally, the estate maintains this green and open character. This is created by a combination of design features: wide building to building set backs; grassed communal spaces; mature trees; hedges on plot boundaries and other planting in large, private front gardens.

The height of the largest building on the estate, the 4-storey block of Ravensbury Court, is balanced by building to building set backs of approximately 30 metres, the communal open spaces and the tree-lined streets. The line of trees on Hengelo Gardens is particularly impressive and mirrors the height and enclosure of Ravensbury Court on the other side of the street.

All elements of the landscape are well-maintained, with the exception of the frontage to Morden Road between the junction with Ravensbury Grove and The Surrey Arms. Here the houses are set well back from the main road behind a row of mature pollarded trees that form an attractive feature along this stretch of busy road. However, the frontages to these properties are noticeably less well cared for than the rest of the estate. The Morden Road frontage facing Morden Hall Park is set behind a slip road that insulates houses from the main road. These homes are, by contrast, very well maintained. There is no obvious physical reason for this difference between the two Morden Road frontages and may reflect other social or economic factors.

The landscape setting, mature trees and other planting are the most significant features of the estate. Together they create a most attractive residential setting, offering quiet and secluded spaces within the estate as well as easy access to the network of green spaces that surround the estate.

As part of the green corridor of the River Wandle the trees have ecological value as well as their visual significance and role in well-being. No matter which option is selected for the future of Ravensbury, it will be important to protect mature trees and increase tree planting wherever possible.





Amenity and play spaces

The consultation process carried out at Ravensbury has indicated the value to residents of the open spaces, gardens and mature trees.

All the semi-detached houses have larger than average front and rear gardens. However, none of the maisonettes or flats have private amenity space but all are adjacent to communal open spaces. These communal spaces do not have any play equipment or seats and therefore appear to offer more of a visual amenity rather than being actively used. However, the survey was carried out in February and a very different picture of use might emerge in in summer.

The lack of play spaces within the estate would not appear to be a problem for residents. This is partly because of the number and size of private gardens but also because Ravensbury Park offers a very accessible, well-equipped play area. The parks and riverside paths also provide excellent opportunities for leisure and activity for all age groups.

The various open spaces within the estate are well-located in terms of intervisibility and surveillance, meaning that they are well overlooked from buildings and passers by even at distance. There is little or no evidence of graffiti, litter or antisocial behaviour within the estate and residents report a strong sense of community and communality. Physical evidence of this can be seen in the amount of personalisation of gardens and threshold spaces by doorways to the maisonettes and flats.



Quality of the external environment summary

The Ravensbury Estate has a distinctive identity, mainly by virtue of its secluded setting and landscape but also because of the formal arrangement and massing of building groups to define spaces within the estate. The development options are complex on this site, and will mainly be determined by ownership and building condition rather than urban design or landscape. However, there is clearly potential to increase density and building height through various permutations of retention and regeneration.

1. Ravensbury has three very different characters: The busy, urban edge to Morden Road; the green and 'rural' edge to the River Wandle; and the secluded communal and private spaces within the estate.
2. High levels car ownership were apparent at the time of the survey but this is unsurprising in a suburban location with a PTAL rating of 2, 'poor'.
3. Should the regeneration option be taken and the number of dwellings increased significantly then car parking might become a serious problem. This will need careful design and management to prevent the streetscape of the new neighbourhood from being dominated by parked cars and also to prevent this becoming a source of friction between new and existing residents.
4. Generally, pedestrians and drivers use the same street spaces to move around and routes feel safe, legible and direct. There are very few pedestrian -only routes within the estate but all could be improved.
5. Ravensbury Estate is set within a distinctive and significant area of high landscape value. Internally, the estate maintains this green and open character. This is created by a combination of design features: wide building to building set backs; grassed communal spaces; mature trees; hedges on plot boundaries and other planting in large, private front gardens.
6. The landscape setting, mature trees and other planting are the most significant features of the estate. Together they create a most attractive residential setting, offering quiet and secluded spaces within the estate as well as easy access to the network of green spaces that surround the estate.
7. The lack of formal play spaces within the estate would not appear to be a problem for residents. This is partly because of the number and size of private gardens but also because Ravensbury Park offers a very accessible, well-equipped play area. The parks and riverside paths also provide excellent opportunities for leisure and activity for all age groups.
8. There is little or no evidence of graffiti, litter or antisocial behaviour within the estate and residents report a strong sense of community and communality.



Review conclusions

Building for Life 12

Building for Life 12 is a tool kit that is aimed at assessing residential quality. It is a national initiative, endorsed by government for well-designed homes and neighbourhoods that local communities, local authorities and developers are encouraged to use to help stimulate conversations about creating good places to live.

It uses a series of 12 questions to interrogate a place and develop a picture of its likely performance against design best practice.

Each headline question is followed by a series of additional questions, and also provided are five recommendations in the form of 'design prompts'.

The 12 questions are broken into chapters, and there are four questions in each of the three chapters:

- Integrating into the neighbourhood
- Creating a place
- Street and home

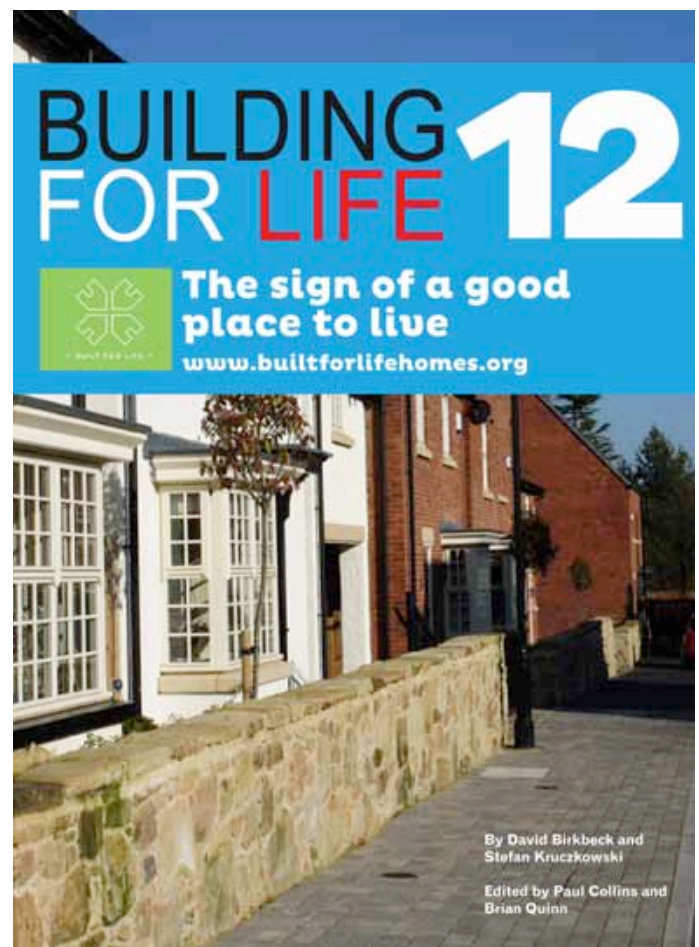
Based on a simple 'traffic light' system (red, amber and green) it is recommended that proposed new developments aim to:

- Secure as many 'greens' as possible,
- Minimise the number of 'ambers' and;
- Avoid 'reds'.

The more 'greens' that are achieved, the better a development will be.





A red light gives warning that a particular aspect of a proposed development needs to be reconsidered.

Here we use the BfL12 questions to compare existing Eastfields with current best practice to draw conclusions on how it performs.







Above: BfL12 (2015 edition)





Integrating into the neighbourhood

Question	Score	Commentary
<p>1 Connections</p> <p>Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones; whilst also respecting existing buildings and land uses along the boundaries of the development site?</p>		<p>The estate connects reasonably well to its surroundings given that it is surrounded by barriers to movement, with good connections to the water and to the shops along Morden Road.</p>
<p>2 Facilities and services</p> <p>Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?</p>		<p>Although the site is adjacent to a small parade of shops, it is relatively isolated from the wider district centre.</p>
<p>3 Public transport</p> <p>Does the scheme have good access to public transport to help reduce car dependency?</p>		<p>The site is well placed for access to train and bus connections.</p>
<p>4 Meeting local housing requirements</p> <p>Does the development have a mix of housing types and tenures that suit local requirements?</p>		<p>The current estate offers a range of dwellings sizes and tenures.</p>

Creating a place

Question	Score	Commentary
<p>5 Character</p> <p>Does the scheme create a place with a locally inspired or otherwise distinctive character?</p>		<p>The estate has a distinctive character, aided by the mature vegetation and feelings of openness.</p>
<p>6 Working with the site and its context</p> <p>Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?</p>		<p>Internally, the estate uses mature planting to good effect, but more could be made of its river and park-side location.</p>
<p>7 Creating well defined streets and spaces</p> <p>Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?</p>		<p>The streets are well-defined by buildings and boundaries.</p>
<p>8 Easy to find your way around</p> <p>Is the scheme designed to make it easy to find your way around?</p>		<p>The estate has a simple layout with good sight lines and this makes it easy to navigate.</p>

Street and home

Question	Score	Commentary
<p>9 Streets for all Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?</p>		Vehicle speeds on the streets are low, not necessarily by design, and the streets are well overlooked by adjacent properties.
<p>10 Car parking Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?</p>		There is a good range of parking solutions on offer, with most of it well-resolved. Lots of on-street wheels-up parking suggests an issue with overall levels of parking or car ownership.
<p>11 Public and private spaces Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?</p>		Much of the space on the estate is well-defined by clear boundaries, and is well overlooked by adjacent properties.
<p>12 External storage and amenity space Is there adequate external storage space for bins and recycling as well as vehicles and cycles?</p>		All of the dwellings have either dedicated bin storage or have access to front or rear gardens for bins and recycling etc. The bins stores for the flats could be more secure.

This summary shows that the Ravensbury estate performs quite well against the BfL12 questions, with eight 'greens' being awarded. This reflects the benefits of its location as well as the design solutions used on the estate.

In the areas where 'amber' scores are awarded, this should give pointers for any future design work on the estate, highlighting issues that could be compounded should they not be properly addressed.

Review summary

The Ravensbury Estate has a distinctive identity, mainly by virtue of its seclusion and landscape setting but also because of the formal arrangement and massing of building groups that define spaces within the estate. The development options are complex on this site, and are likely to be determined by ownership, viability and building condition rather than urban design or landscape.

1. The Ravensbury Estate is located in a relatively isolated part of the Borough, as reflected in its PTAL classification of 'poor' (2).
2. The extensive parks, riverside open spaces and other barriers surrounding the estate make it an enclave and there is relatively little that can be done to integrate Ravensbury better into its wider area.
3. This relative isolation creates, on the one hand, a quiet and secluded residential neighbourhood but, on the other hand, restricts movement options for residents and is likely to encourage more trips to be taken by car.
4. There is some scope to improve access on foot and cycle through the process of regeneration. However, it is important not to make the estate over-permeable as this will undermine seclusion for residents and disperse movement and activity without any real gains in wider connectivity.
5. Analysis of building facades reveals that the entire external and internal perimeters of the estate have active or passive frontages providing good levels of surveillance. Conversely, there is very little dead frontage with the exception of the edges to garage courts and the pedestrian paths that are not overlooked.
6. The density of the estate at 43 dwellings per hectare (dph) is similar to surrounding development of the same period. However, this is low by modern standards, even in a suburban location, and there is potential to increase density and building height through the various permutations of retention and regeneration.
7. Ravensbury Estate is set within an area of high landscape value. Internally, this green and open character is maintained by the presence of grassed communal areas, mature trees and other planting. Together they create a most attractive residential setting, offering quiet and secluded spaces within the estate as well as easy access to the network of green spaces that surround the estate.
8. It is important that mature trees and riparian landscape are protected and improved. This is most likely to be possible with masterplan options that combine retention and regeneration rather than complete redevelopment.
9. There is little or no evidence of graffiti, litter or antisocial behaviour within the estate and residents report a strong sense of community and communality.
10. High levels of car ownership were evident at the time of the survey.
11. Currently, a large proportion of the houses have on-plot parking with the rest being provided on street. However, car parking may become a serious problem should regeneration options significantly increase the number of dwellings on the site. This will need careful design and management.
12. The Building for Life 12 assessment for Ravensbury results in 8 'greens' out of the 12 questions.

Ravensbury Urban Design Review
Sue McGlynn Urban Design Ltd
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Christopher Holt,
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Development Control
Merton Council
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Morden SM4 5DX

Tel: 020 8545 3777
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Dated 21st June 2016

For the attention of Mr Shaun Hamilton, Case Officer

Dear Sir,

Reference: PLANNING APPLICATION : 16/P1968

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

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

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

Setting : Character and views along Ravensbury Grove:

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

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

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



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



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



View South from Ravensbury Court on Ravensbury Grove



Ravensbury Grove looking South



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

Relationship with the Wandle Valley

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



Views along Ravensbury Grove & Hengelo Gardens (Above)



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



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



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



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



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



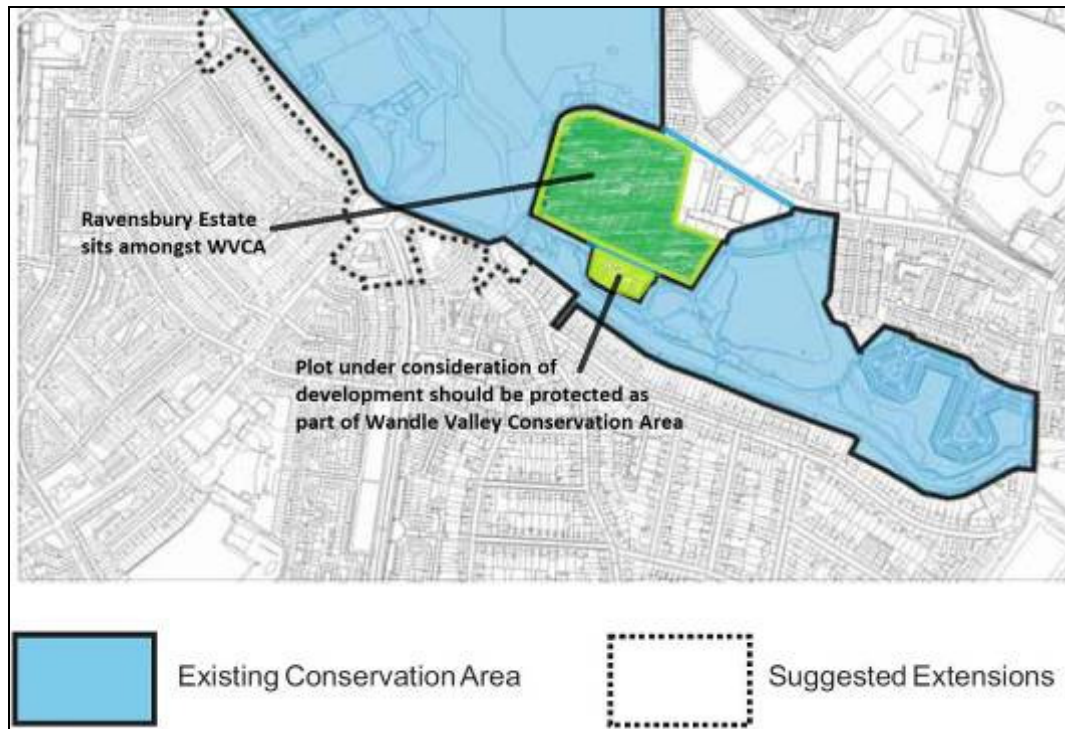
View from Ravensbury Park toward existing 64-70 Ravensbury Grove



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

The Wandle Valley Conservation Area (WVCA):

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



Wandle Valley Conservation Area Map



Merton's Sites and Policies Map

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

DM O1 Open space

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

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

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

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

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

SA/SEA implications:

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

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

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

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



Drainage drawing showing Levels proposed by the developers

Paragraph 5.10. states:

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

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

DM O2 Nature conservation, trees, hedges and landscape features

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

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

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

DM D1

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

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

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

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

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

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

Safety & Security (6.7)

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

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

Gated development (6.8)

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

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



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

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

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

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

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

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

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

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

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

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

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

Walking South down Ravensbury Grove

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

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



Approaching the Southern End of Ravensbury Grove

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

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



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



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

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

Boundary between Ravensbury Estate & Ravensbury Park

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



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

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

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

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

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

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



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

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

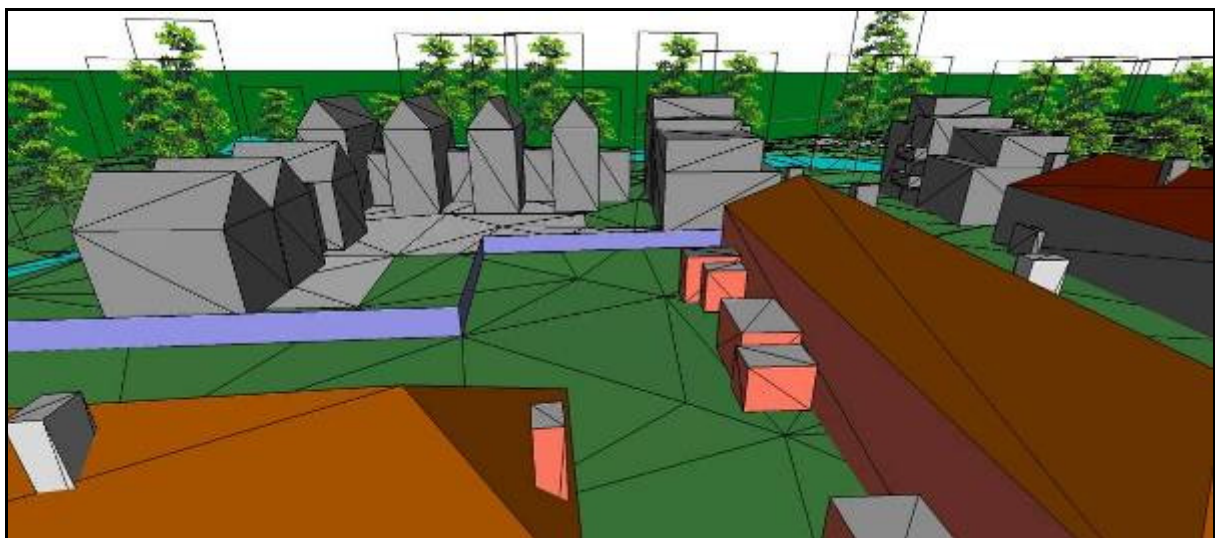
The images below demonstrate the impact of this development and loss of outlook for the homes along 1-10 Hengelo Gardens. The riverside houses block out much of the trees, whilst the mews houses encroach on the garden amenity that the residents currently enjoy.



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



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



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

Views from within Ravensbury Park

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

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

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



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



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

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

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

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

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

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

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

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

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

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

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

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

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



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

Site Levels:

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

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

The Developing Ravensbury Local Plan:

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

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

Flooding, The Sequential Test & Exception Test

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

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

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

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

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

Other notes:

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

Conclusion:

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

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

Yours faithfully,

Christopher Holt,

Chair, Ravensbury Residents Association

Appendix 1 : Photographs of Ravensbury Grove and associated areas.



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



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



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



Existing Street scene approaching southern end of Ravensbury Grove



View of Ravensbury Park seen from end of Ravensbury Grove.



Treeline seen from end of Ravensbury Grove



View across existing landscaping towards garages (March 2016)



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





Ravensbury Grove: Planted and landscaped area seen in May 2016



Ravensbury Grove: Planted and landscaped area in May 2016





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





View from Hengelo Garden to rear of Ravensbury Grove showing outlook



View from Hengelo Gardens & Ravensbury Court towards garages area.



View looking south down Ravensbury Grove towards the park



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





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



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



View from rear of Hengelo Gardens towards garages area

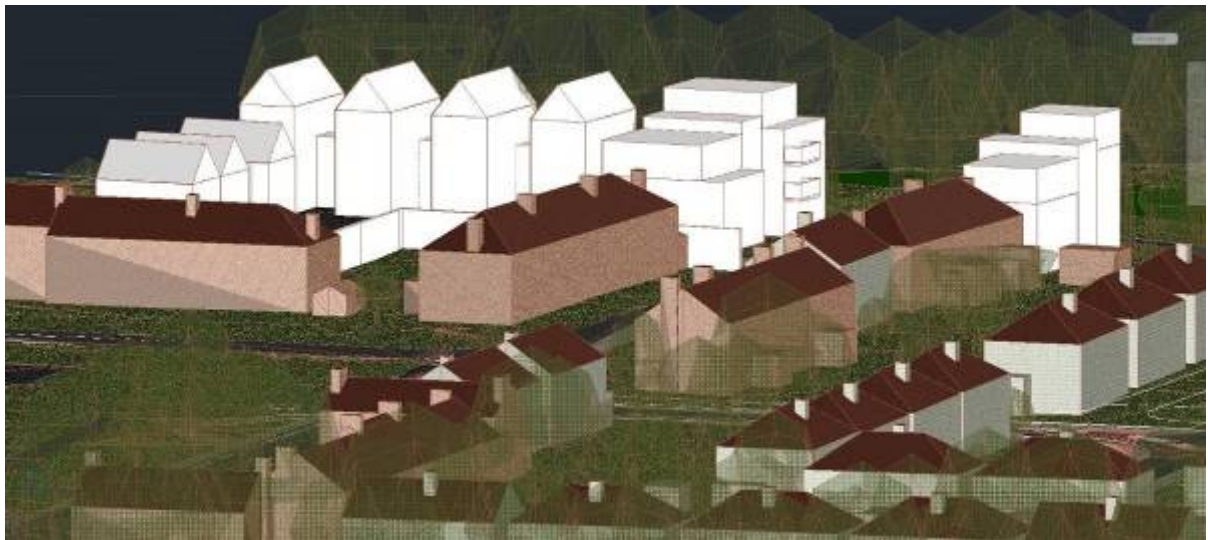


Artist's impression of Proposed housing on derelict garages site. (above and below)

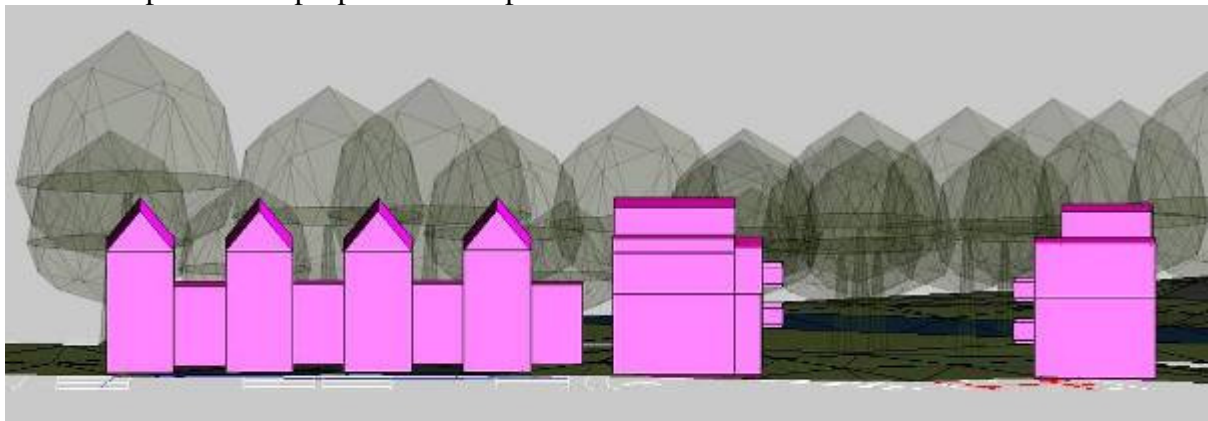


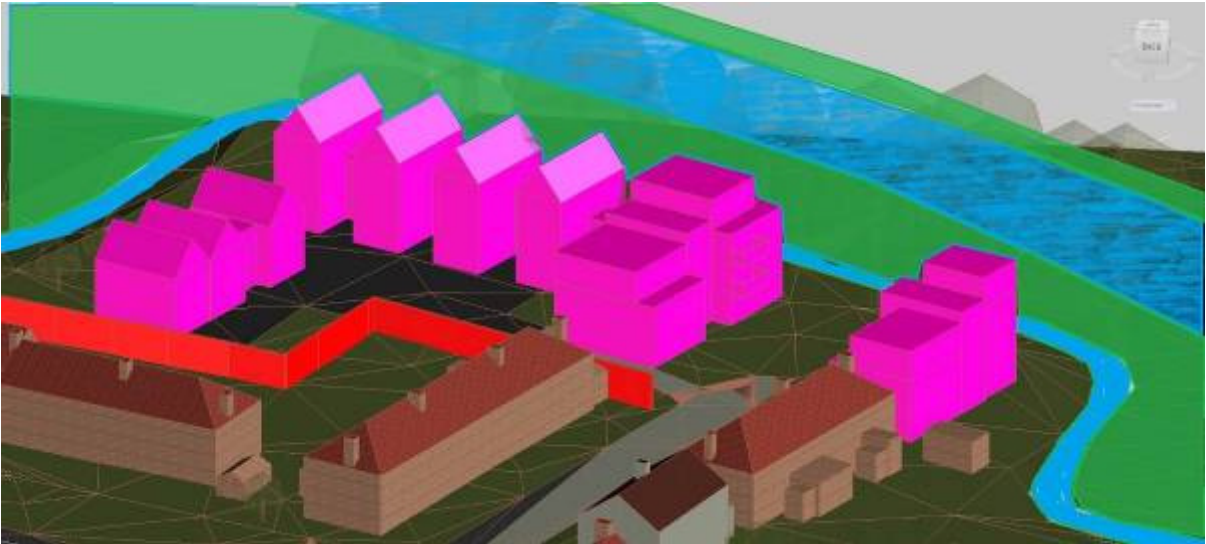


Artist's impression of Proposed housing on derelict garages site.

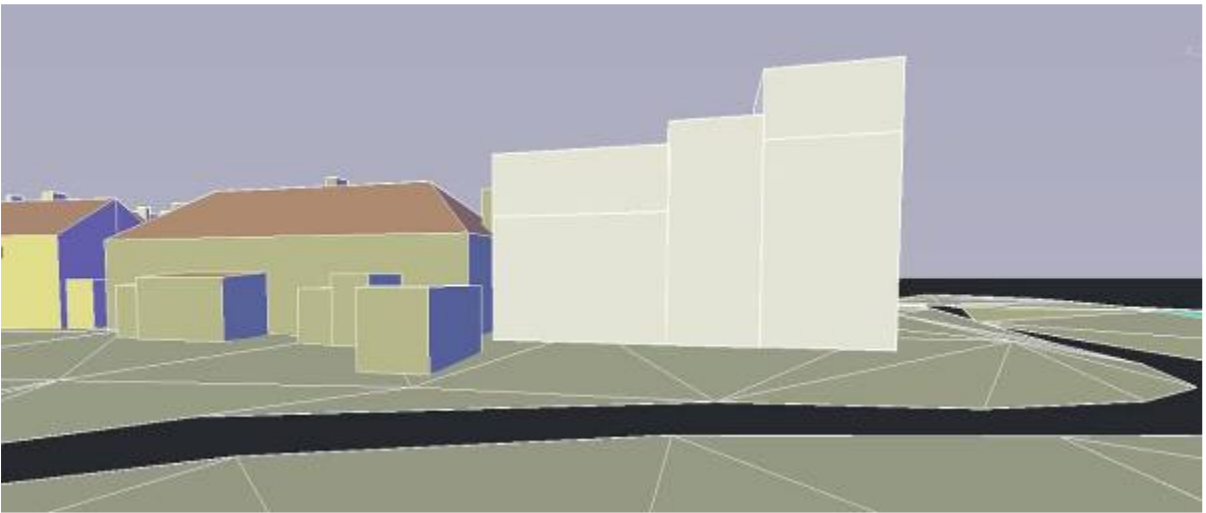


Artist's impression of proposed development site.





Artist's impression of proposed development site.



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



Extent of vegetation within derelict garages site.



Derelict garages site indicating existing scale



Derelict garages site showing extent of park now within boundary.



Appendix 2 : Aerial photographs



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



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



View showing proximity to Ravensbury Park



View showing boundary with Hengelo Gardens



View showing southern end of Ravensbury Grove



View showing southern end of Ravensbury Grove

Appendix 3: Shadow maps & 3d model simulations

January:



1st January @ 1200hrs



1st Jan @ 1500hrs

April:



1st April @ 0900hrs



1st April @ 1100hrs

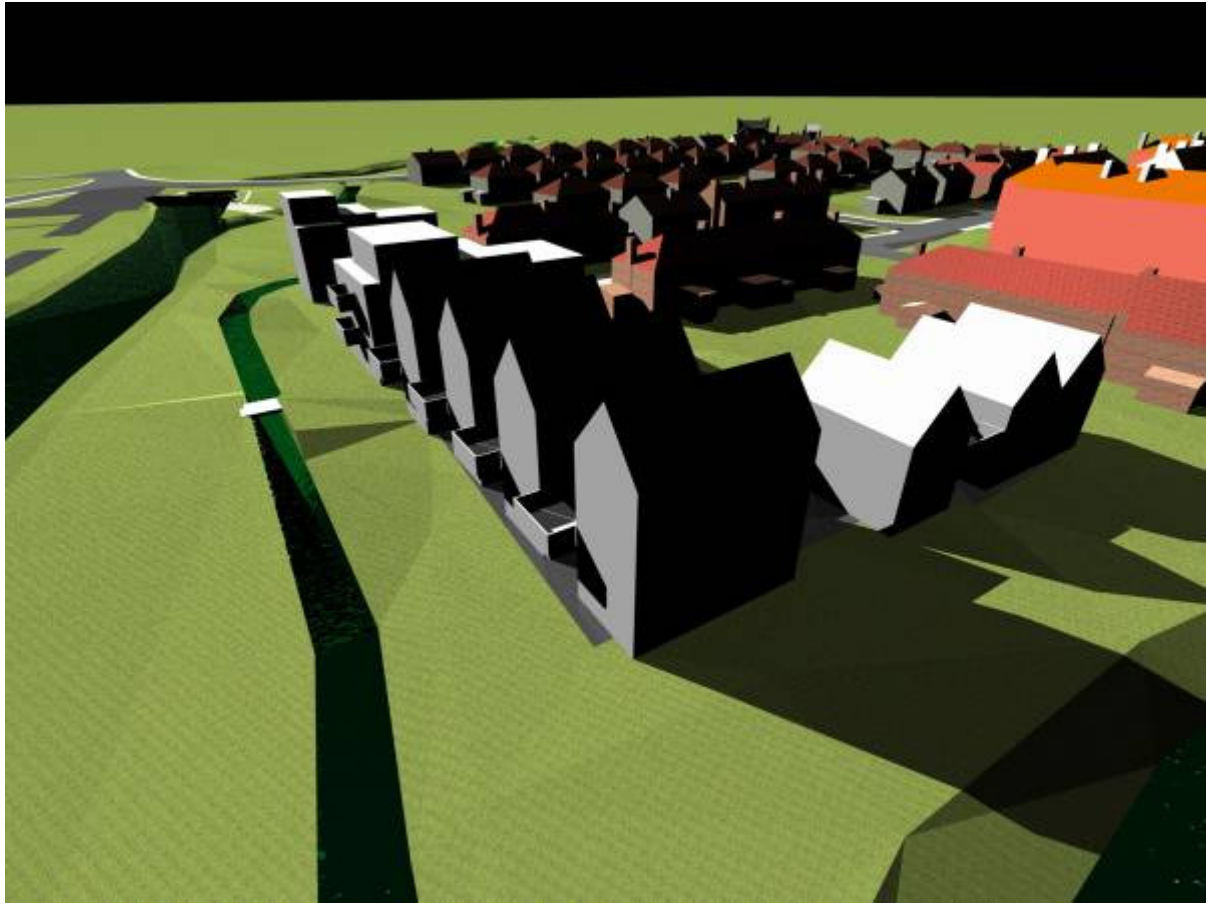
June:



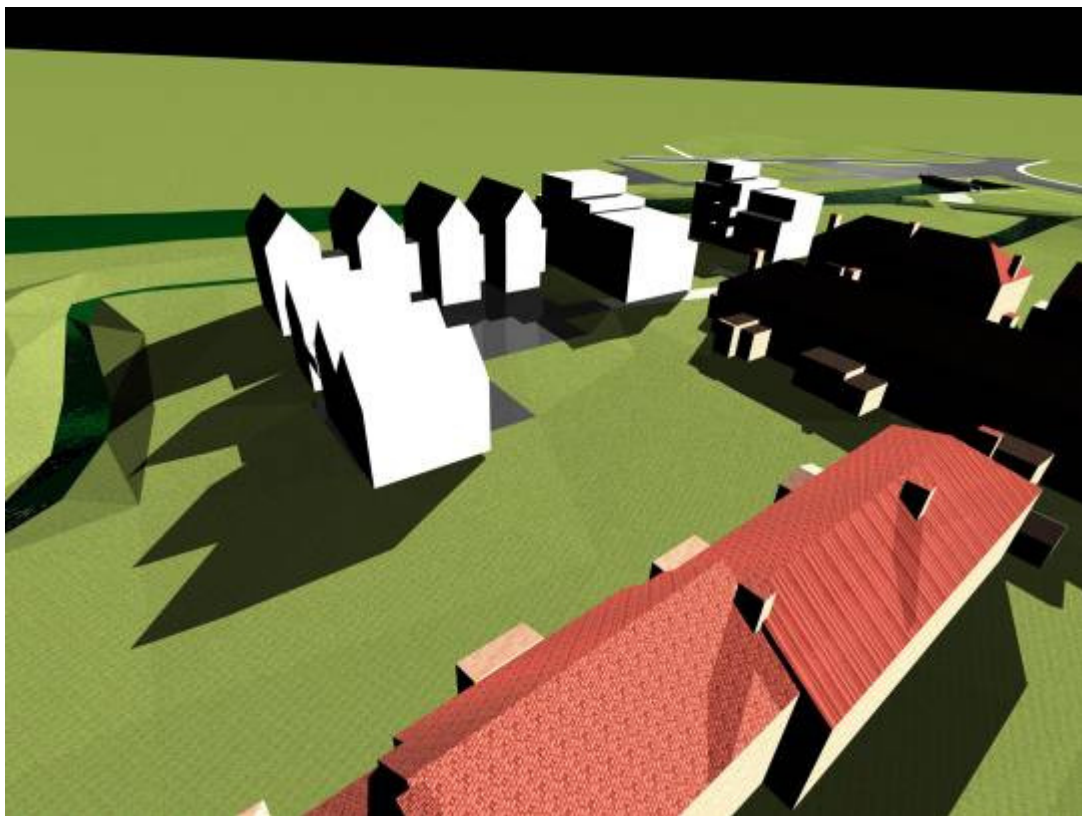
1st June @ 0700 hrs



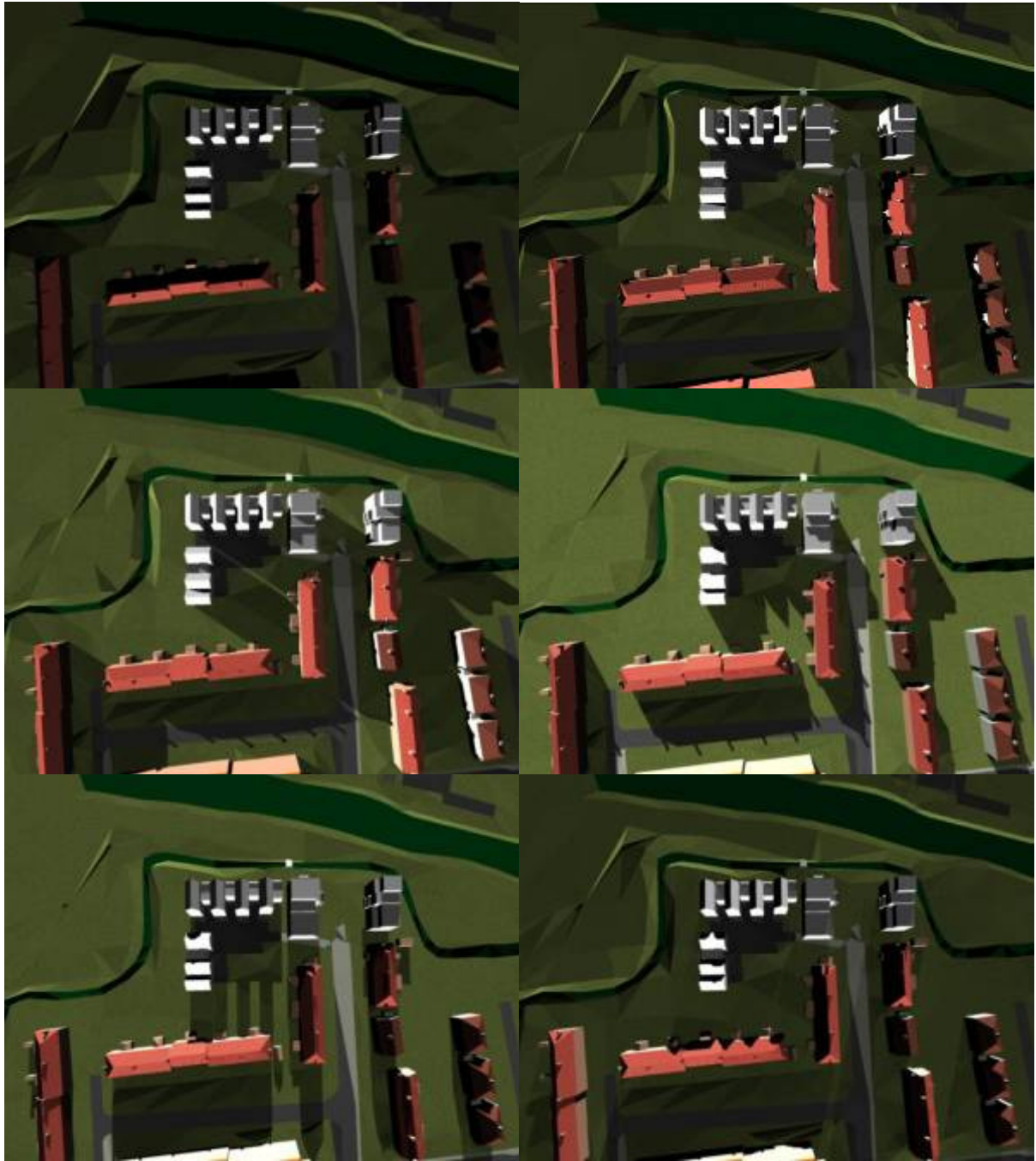
1st June @ 0800 hrs



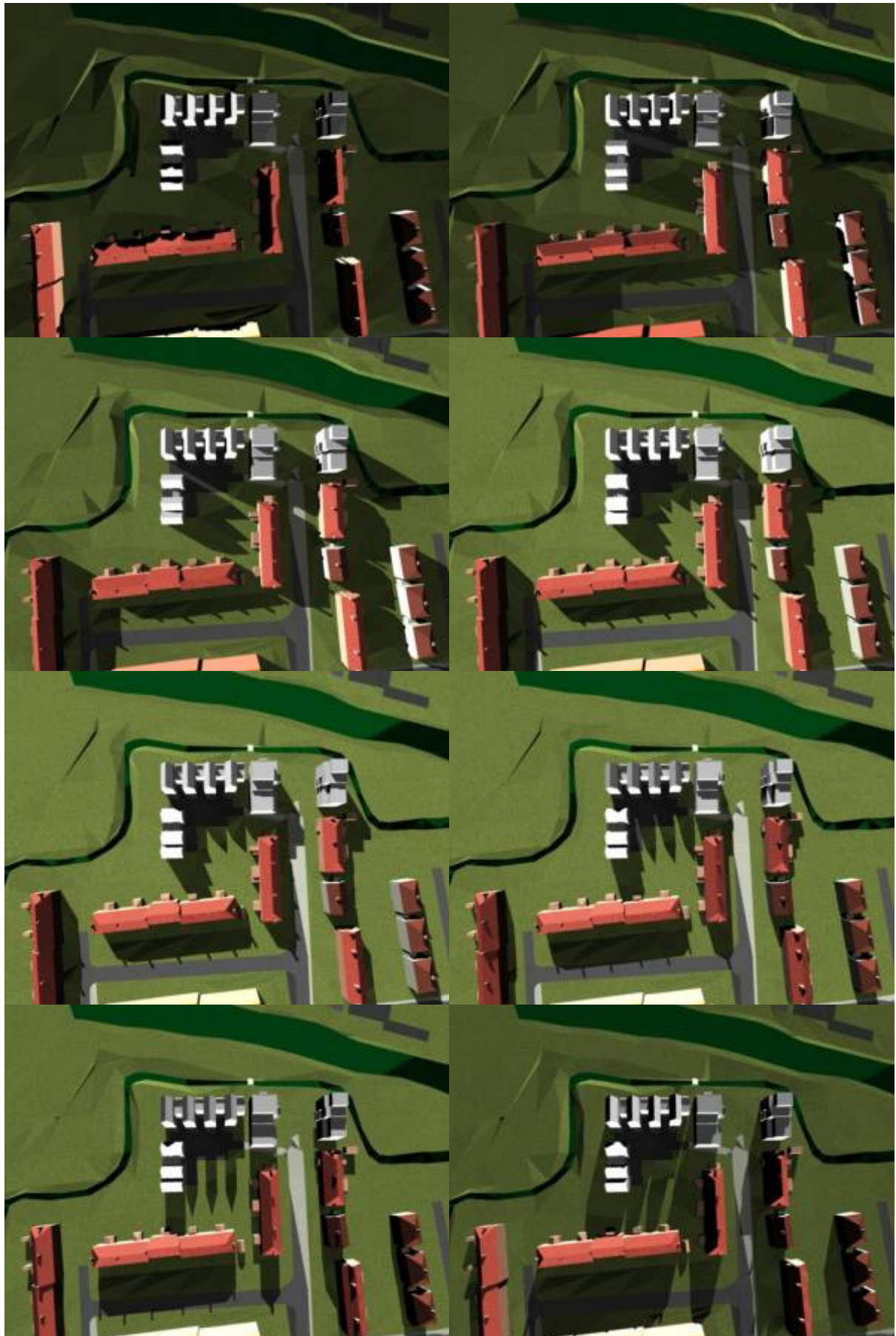
1st June @ 1630 hrs (above & below)



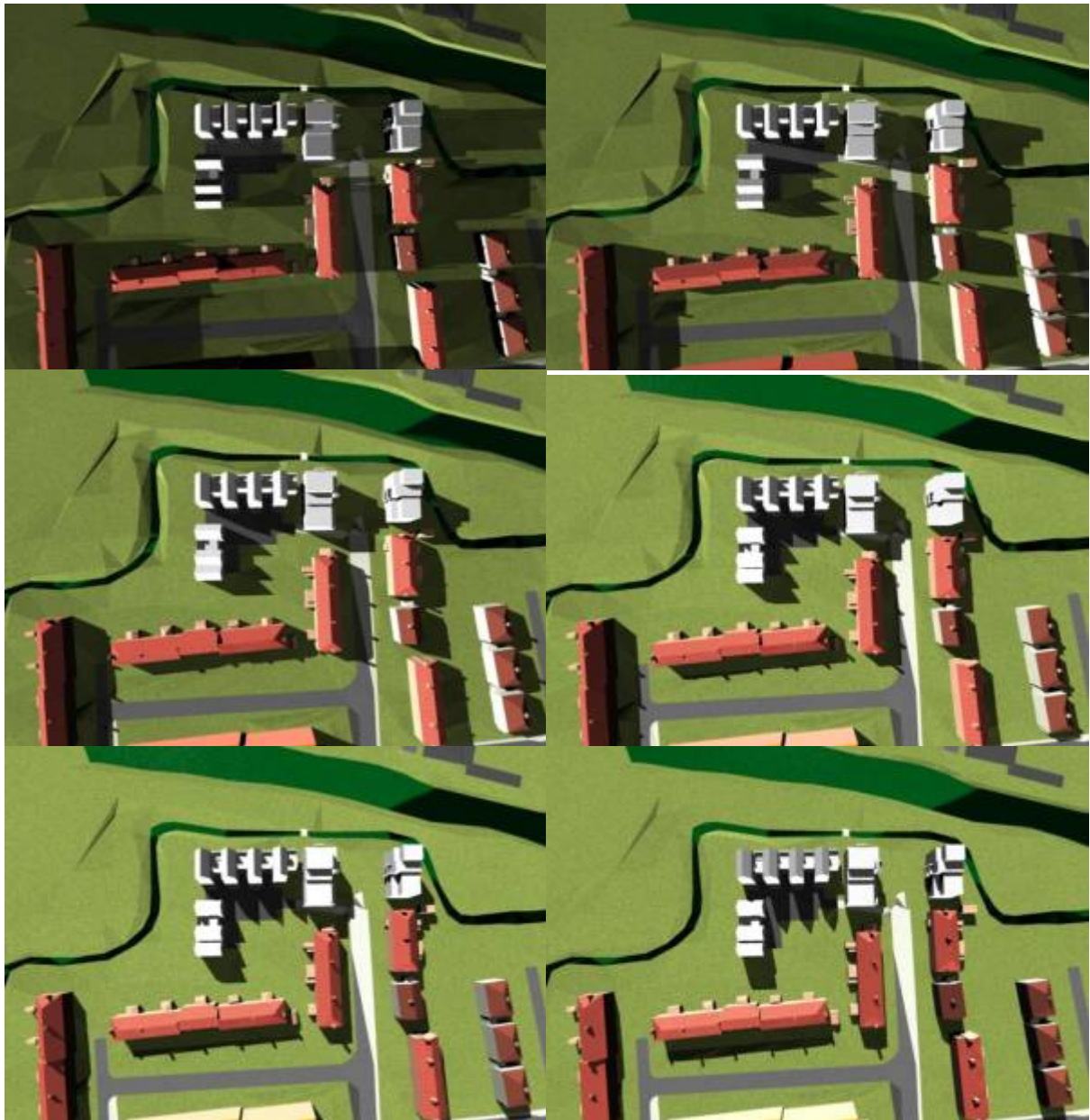
Shadow transitions on 1st January: @ 0900 to 1600 hrs

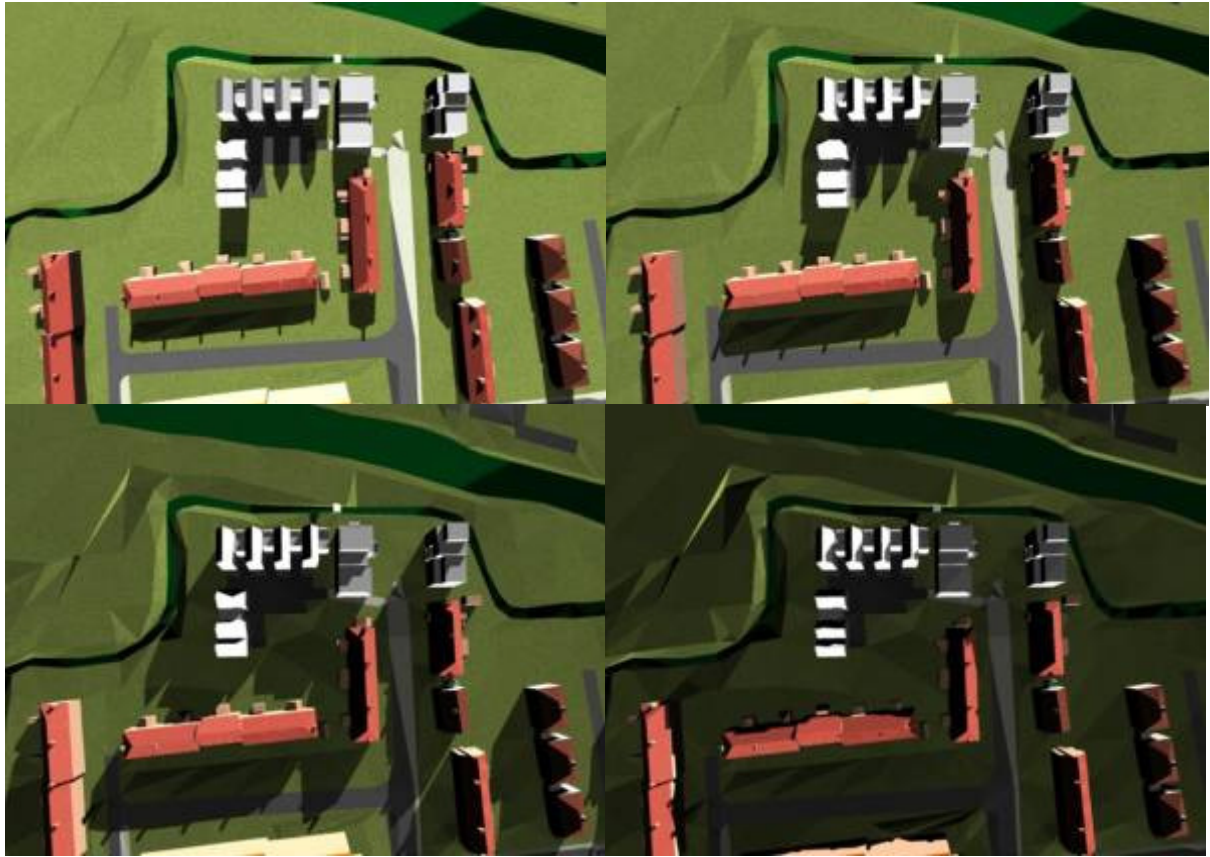


Shadow transitions on 1st February : @ 0900 to 1600 hrs

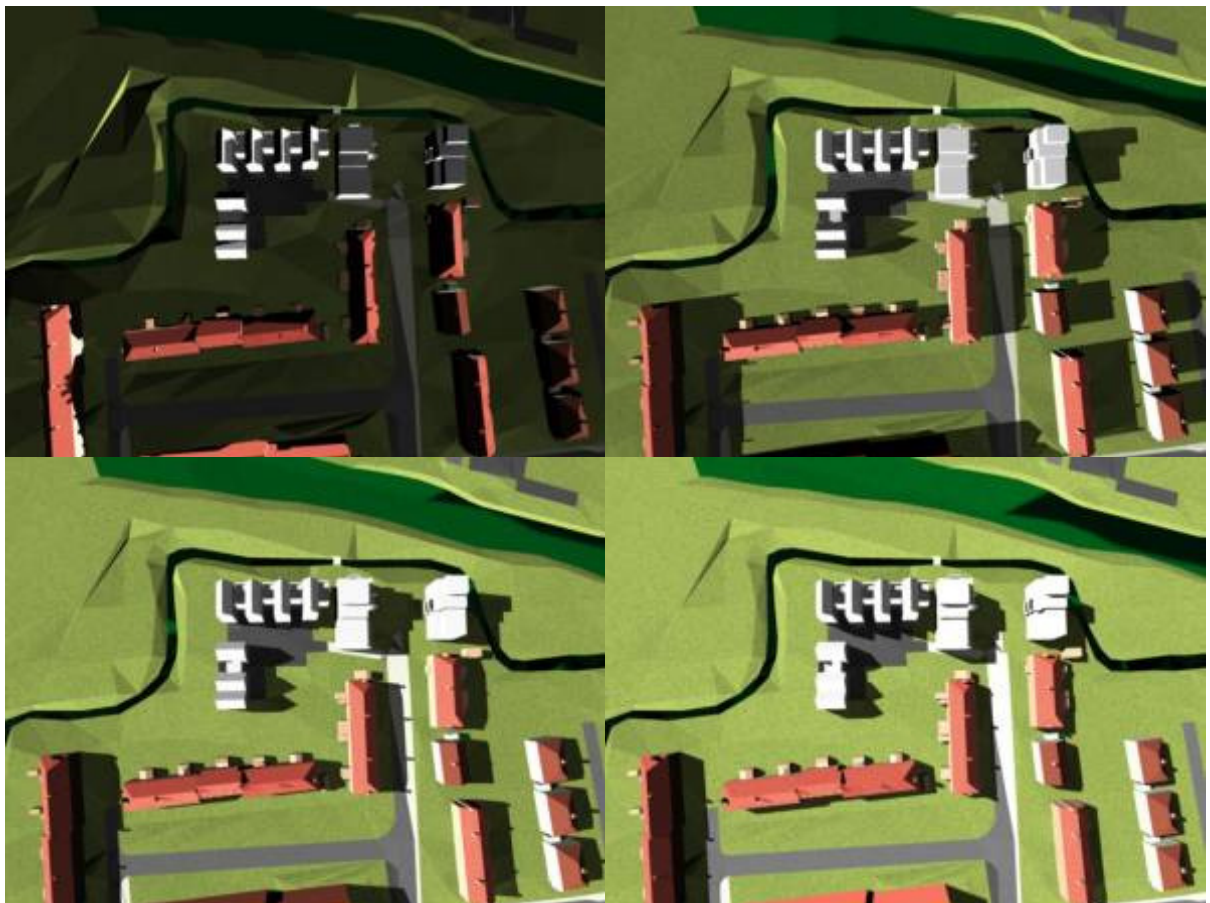


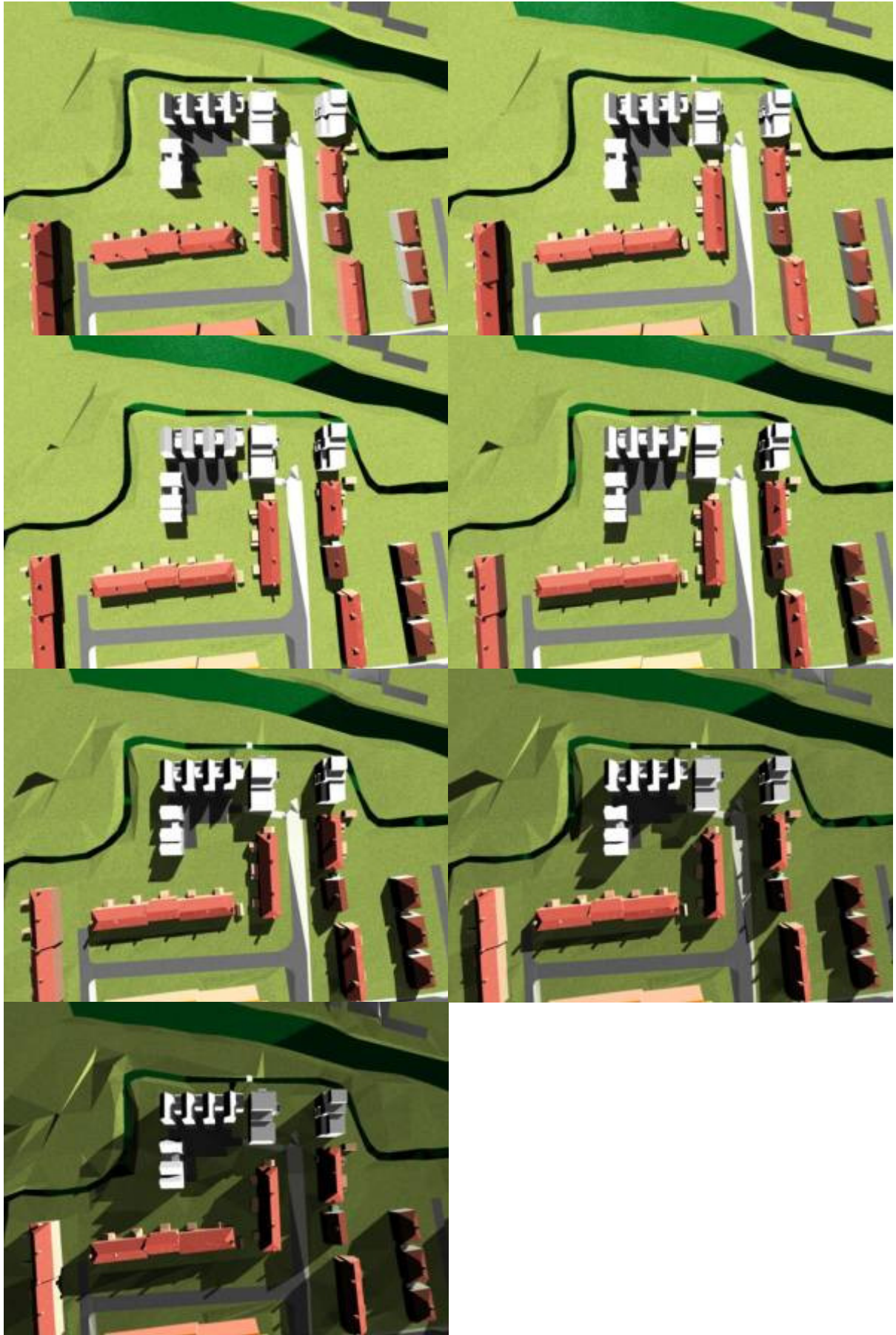
Shadow transitions on 1st March : @ 0800 to 1700 hrs



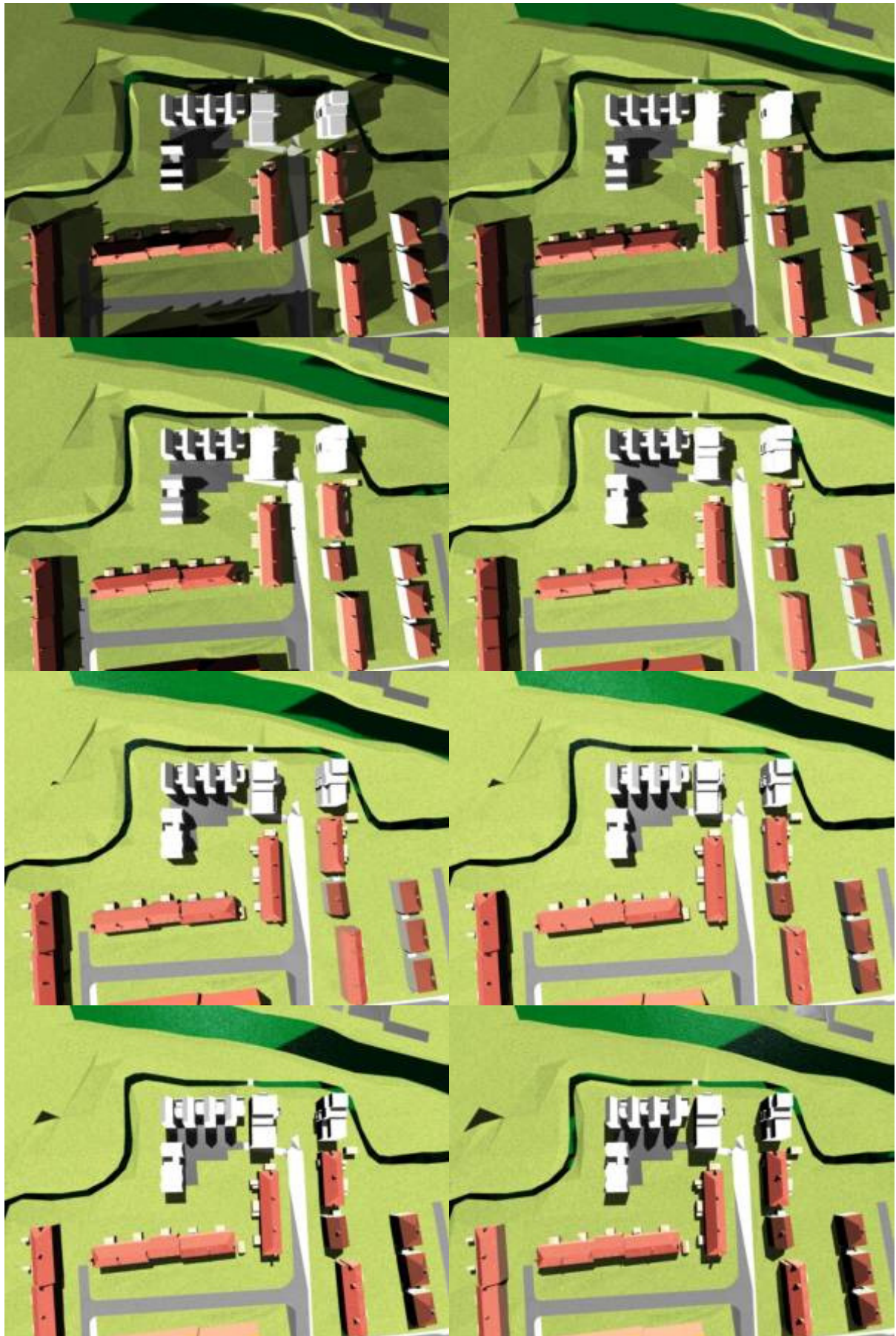


Shadow transitions on 1st April @ 0800 to 1800 hrs :



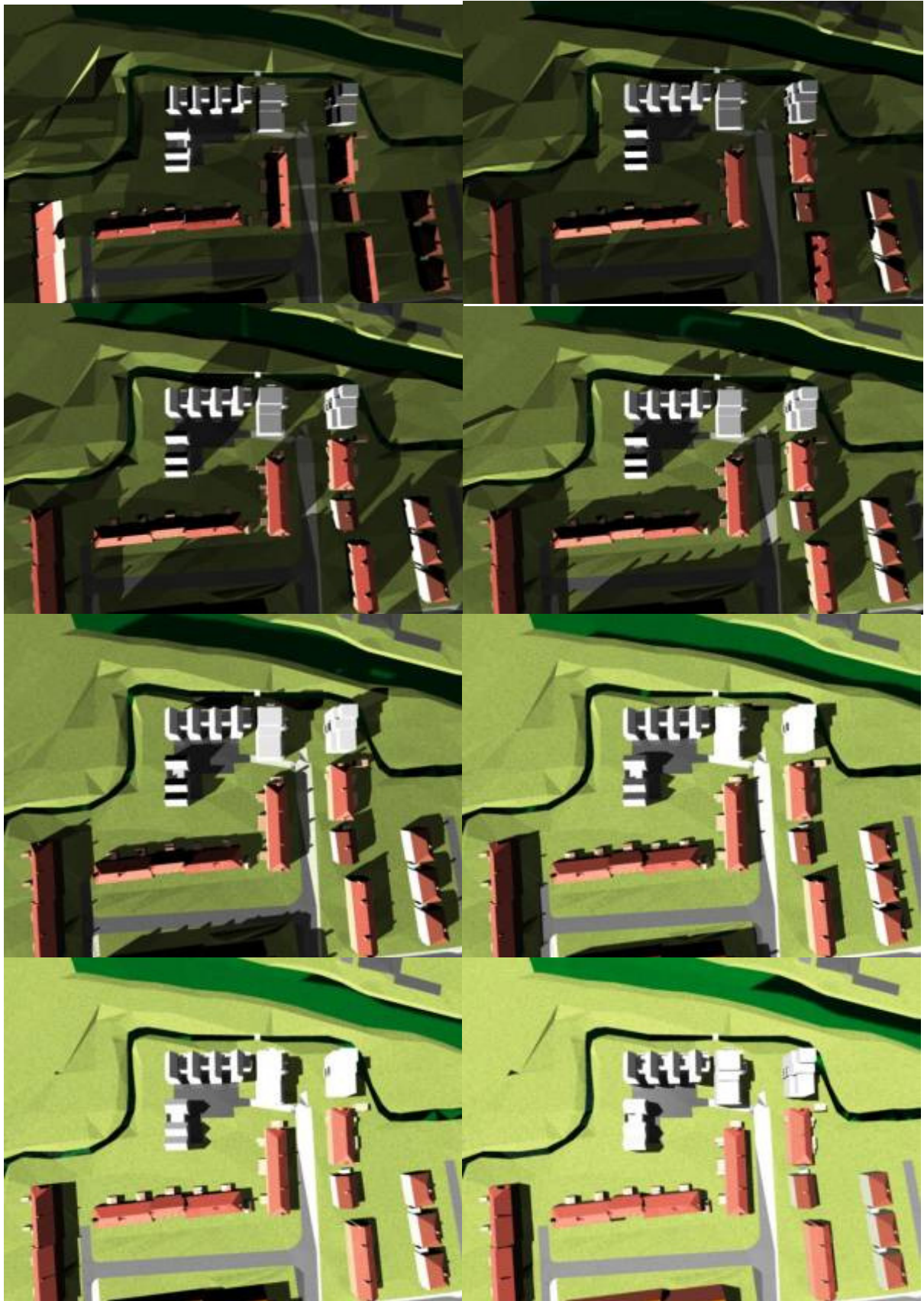


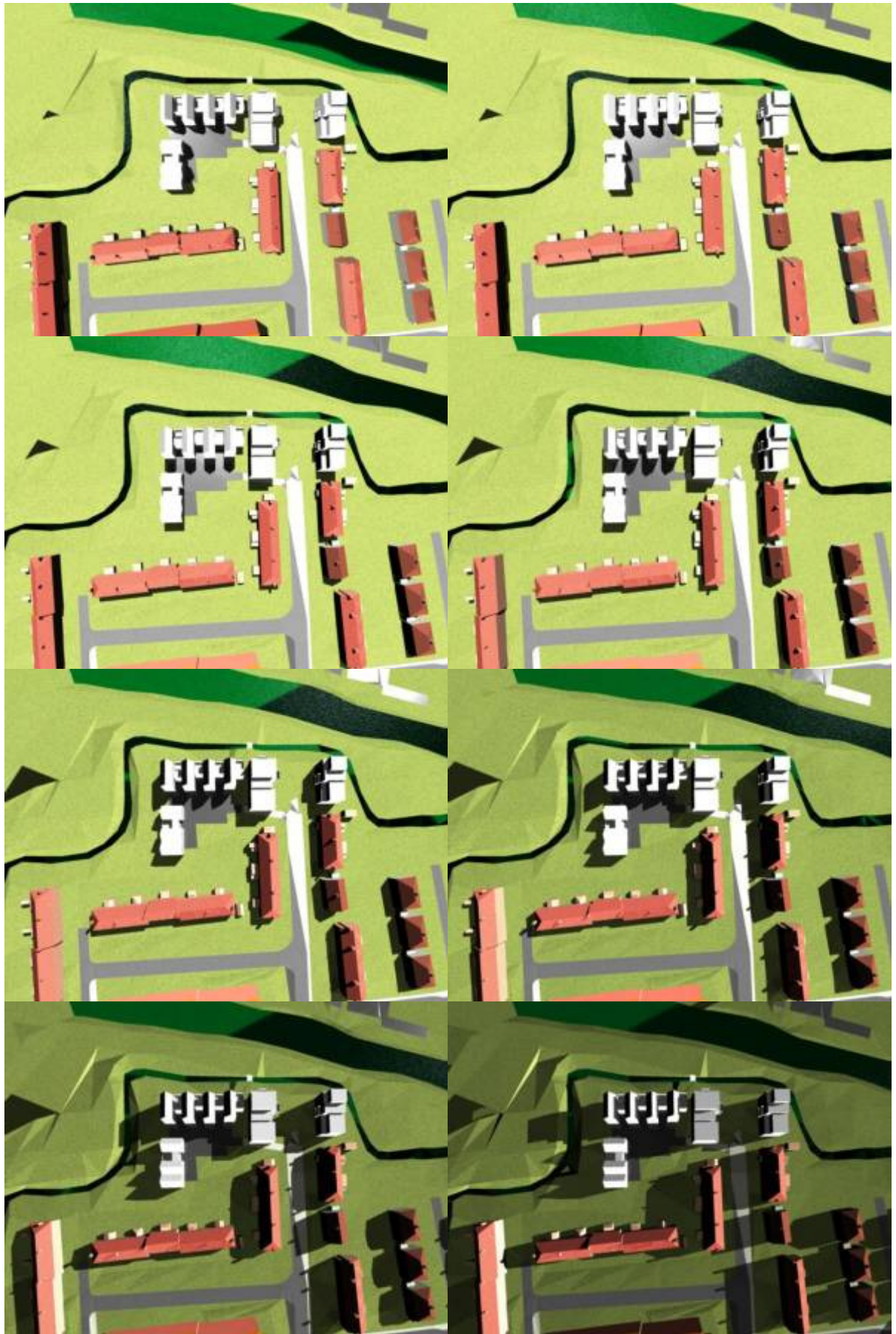
Shadow transitions on 1st May : @ 0700 to 1800 hrs



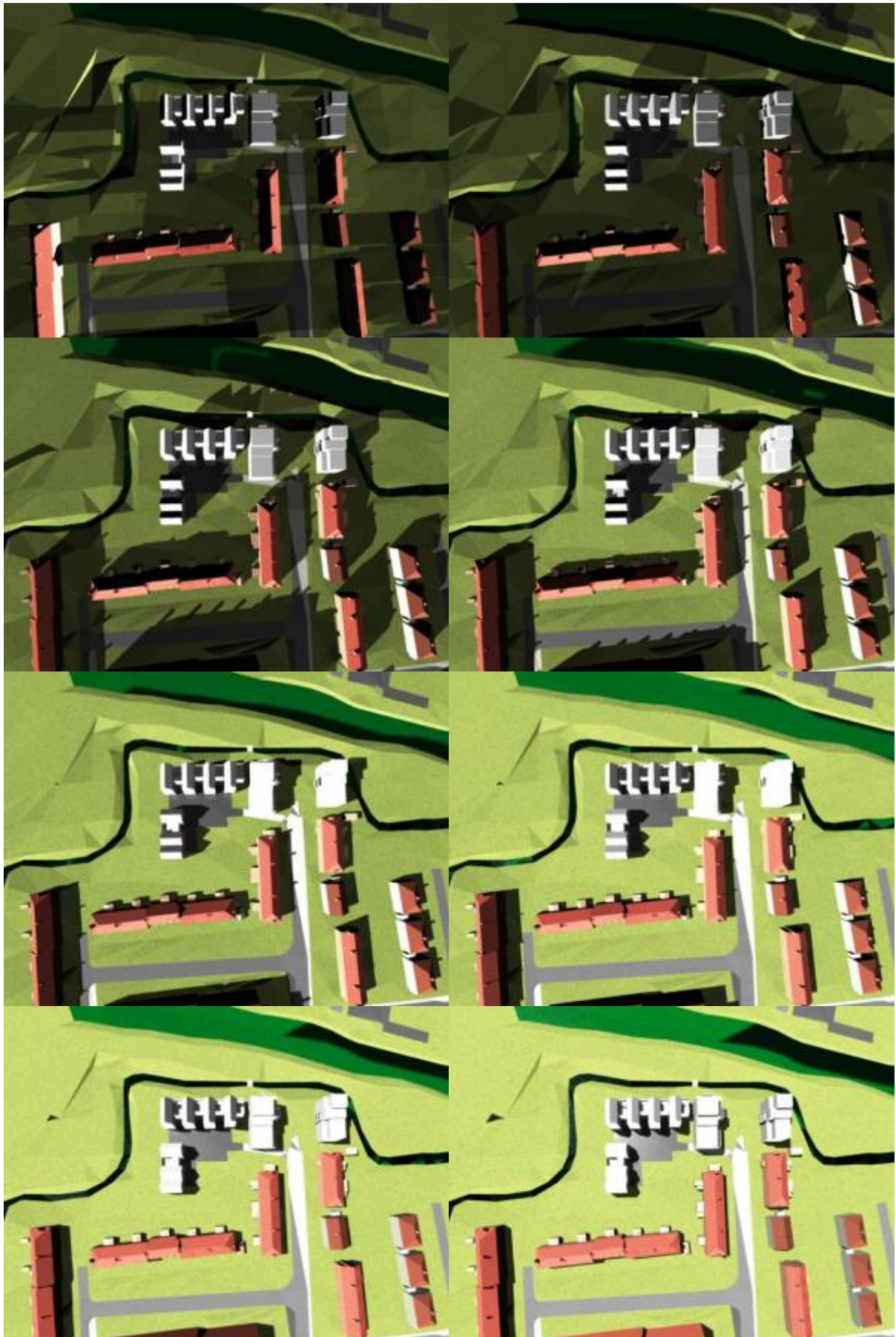


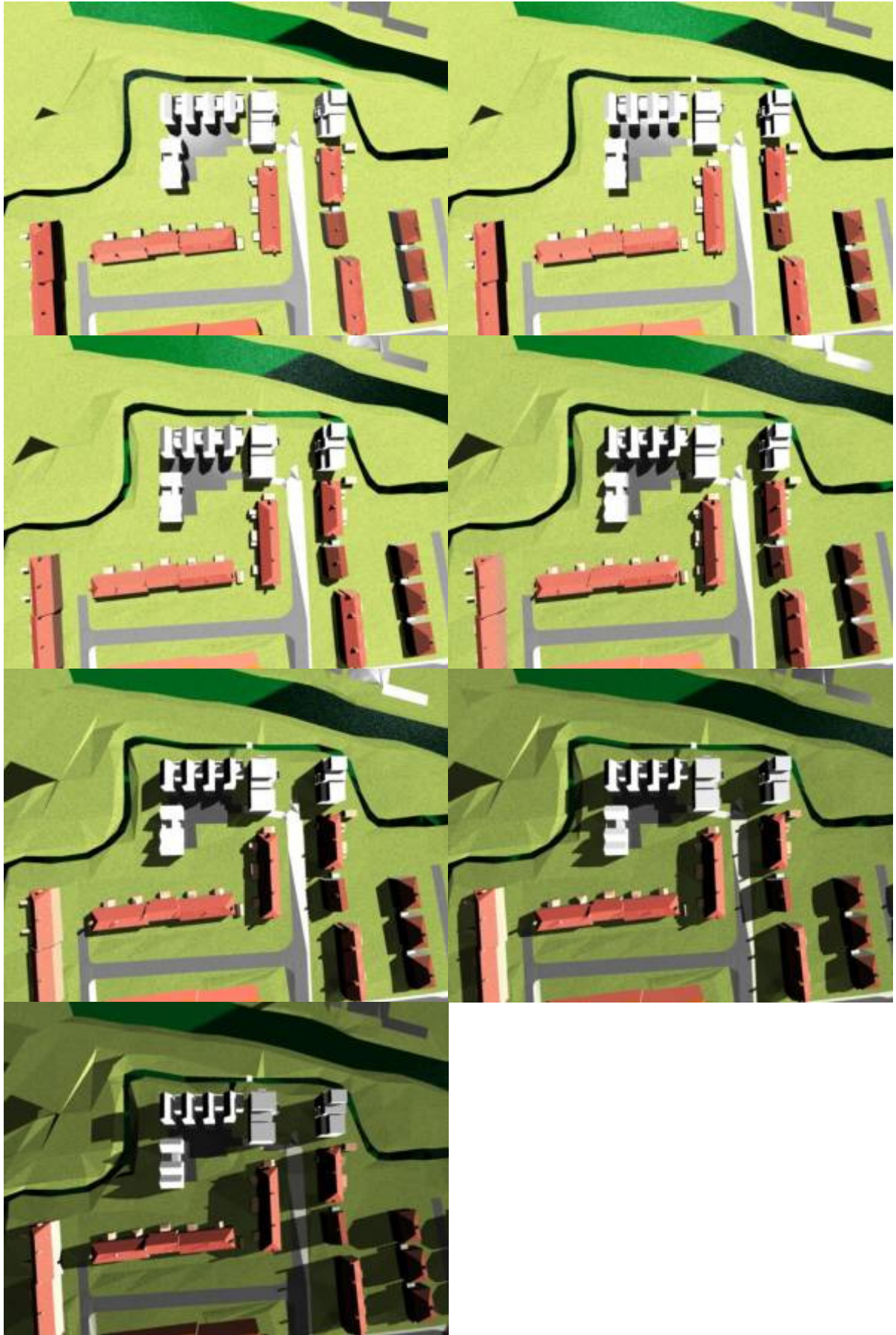
Shadow transitions on 1st June : @ 0500 to 1900 hrs





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





END.